



Haier Europe

Code of Ethics

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CODE OF ETHICS

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1. APPLICABILITY

The Code of Ethics (hereinafter referred to as the “**Code**”) is applicable to Haier and Candy legal entities directly and indirectly controlled by Haier Europe Appliances Holding B.V. (hereinafter jointly referred to as “**Haier Europe**”).

For sake of clarity, the Code is also applicable to all persons involved with Haier Europe, including its Board of Directors, auditors, shareholders, employees, contractors, consultants, advisors, any party doing business with its companies, such as distributors, suppliers, affiliates and commercial partners (hereinafter referred either as the “**Business**”, “**Company**” or “**Community**”).

The Community shall acknowledge, understand and agree to abide by the principles and content of this Code.

In addition, all our employees shall follow the Code of Conduct, policies, procedures and guidelines set out by the Companies, their own departments and applicable professional standards.

2. OUR CORE VALUES

At Haier Europe, we are firmly committed to ensuring that all recipients of the Code observe the highest standards of ethical behavior and conduct.

Our core values are honesty, integrity, commitment, dedication, initiative and responsibility, and we strive to create value for our Community, shareholders, employees and customers. This foundation defines the principles behind each section of the Code as defined below:

- **Honesty and integrity** serve as the basic foundation for achieving the highest work ethic;
- **Commitment and dedication** are the source of continuous entrepreneurial innovation and the bases for reaching new goals, meeting requirements of applicable law and the needs of stakeholders and clients;
- **Initiative and responsibility** are the internal core quality requirements for autonomous operation, and a driver of individual employee performance;
- **Striving to create value for users and customers** is the fundamental and sole reason for the existence of the organization and the goal of our employees.

Powered by the Rendanheyi model, Haier Europe is guided by Haier Attitude and its three main traits:

- Entrepreneurship & Innovation
- Zero Distance
- IoT & Ecosystem Thinking

3. PURPOSE

The Code serves as our compass, which guides our behavior as we carry out our day-to-day activities. We operate in a global environment and may face situations that require us to reflect upon the principles of the Code in order to make the right decisions. These principles are not exhaustive, but are intended to facilitate decisions that are consistent with Haier Europe values and business goals as well as its legal and policy obligations. Further and more detailed guidance can be found in the Company compliance programs, policies, procedures and guidance, which shall be aligned with this Code.

If you have any questions about the interpretation of the Code, or in the event that the Code should seem to conflict with any Company compliance programs, policies procedures and guidance for any reason, please refer to the Compliance team.

4. ETHICAL PRINCIPLES

4.1 PROFESSIONALISM

We base our behavior and work on the factual and objective understanding of the business and our dealings with fellow employees.

Excellent professional ethics are a fundamental quality that we must all possess, which also serves as an essential quality that we must have in undertaking our own job responsibilities.

Haier Europe seeks to scrupulously observe professional ethical principles, consciously abide by professional standards and operate while considering both the customer's interests and behaviors that reflect ownership of our own goals and work, to be implemented by borderless teamwork and active cooperation across departments.

4.2 ANTI-DISCRIMINATION, ANTI-HARASSMENT AND ANTI- SLAVERY

Haier Europe is committed to eliminate any discrimination from our conduct, and to respect differences in gender, age, ethnic origin, religion, political and union affiliation, sexual orientation, identity, language and disability. We offer equal opportunities to all persons, including employees at all levels, stakeholders, partners and third parties in the distribution and supply chain shall strictly comply with anti-discrimination and anti-harassment principles. With respect to recruitment, salary, welfare, career development, and reward/disciplinary measures, we shall make decisions based on objective facts, refrain from discriminating or treating anyone differently due to nationality, place of birth, gender, age, physical characteristics, interests and hobbies, religious faith, etc.

Haier Europe does not tolerate any act of slavery, humiliation, threat, hostility or discrimination. We shall respect others and avoid situations in which our behavior may be deemed inappropriate.

4.3 PRIVACY AND CONFIDENTIALITY

We shall protect all personal information, including names, contact information, employment information, property information, age, race or nationality, religious or philosophical belief, health or sexual orientation and other confidential information. We shall respect rights regarding the privacy of individuals (including employees, clients, users and suppliers), and strictly observe relevant laws and regulations.

4.4 CONFLICT OF INTEREST

Haier Europe respects the private life of our employees. All Haier Europe people shall avoid situations in which their own interests may conflict with the interests of the Business/Companies of the Group. In the event that a conflict of interest occurs, individuals shall disclose specific situations and activities in which they, their families or partners have interests that may conflict with the interests of Haier Europe.

4.5 HEALTH, SAFETY AND THE ENVIRONMENT

We believe that the protection of health, safety and the environment ("**HSE**") is an essential requirement for the development of Haier Europe, and is an important part of our production and operation activities. Proper protection of health, safety and the environment is important for creating a better workplace and facilitating outstanding performance.

We strive to achieve the HSE goal of zero injuries and deaths related to equipment, zero safety-related accidents, and zero hidden hazards. We devote ourselves to providing a healthy and safe working environment for everyone, to fulfill our corporate social responsibility and protect the environment.

The achievement of our HSE goal requires the participation and effort of everyone. Haier Europe shall observe HSE laws, regulations and internal rules, learn and understand HSE information related to our own position, and strengthen HSE awareness.

We shall endeavor to establish and maintain a healthy and safe workplace, and provide workplace safety and hygiene conditions that comply with legal provisions and applicable labor protection policies.

We believe in the sustainable development of production and we actively implement ESG

(Environment, Society and Governance) practices. We commit to control gas emissions, waste, toxic substances, and we promote social responsibilities and ESG values.

4.6 INTELLECTUAL PROPERTY

Haier Europe is aware of the importance of intellectual and industrial property, and respects and protects the content of all forms of its own property rights and those of others. As such, it is prohibited to use any protected intellectual property in any way or form, use industrial secrets belonging to others, or use industrial designs or models belonging to third parties for commercial purposes.

4.7 FINANCIAL INFORMATION AND OPERATIONAL DATA

Operational and financial information and data must be true, accurate, complete and provided in a timely manner. It is prohibited to conceal, forge or manipulate records, or create, provide or disclose false reports and relevant information.

All business data, including but not limited to business activity records, contracts, approval documents, financial instruments and financial records, must be kept properly to ensure the completeness and accuracy of business data. We shall systematically file and keep such business data according to Haier Europe's archive management rules, applicable laws and regulations.

4.8 COMPANY ASSETS

We shall exercise due care and take effective measures to protect Haier Europe assets (both tangible and intangible), use and dispose of the assets in a responsible manner such as to prevent waste, damage, loss, misuse, misappropriation or infringement.

Without the approval and authorization Haier Europe, we shall never sell, transfer, lend or otherwise dispose of assets at will, or make guarantees or demonstrations in the name of the company.

4.9 COMPANY SYSTEMS AND DATA PROTECTION

The Company is highly committed to data protection and cyber security. In this regard, we shall manage personal data over their entire life cycle as required by law, and implement cyber security measures to protect systems, networks, and programs from digital attacks.

IT systems are the backbone sustaining Haier Europe decision making processes and, as such, they play a key role in supporting business activities and – to a certain extent, our competitive advantage - and must be protected and properly used.

Regarding the use of the IT system on a daily basis, it is expressly prohibited to falsify

electronic documents, illegally access any information or telematics systems protected by security measures, intercept, obstruct and interrupt telematics communications or damage IT electronic information, including those used by Governments and Public Administration.

4.10 PRODUCT & MARKETING SUSTAINABILITY

Our products are characterized by their reliability, safety, excellent design, quality assistance and long life. In order to maintain these characteristics as promised to the users of our products, we are required to fully comply with consumer protection regulations and internal standards, designed to eliminate product defects.

Our products and services meet the highest quality standards, and we are proud to present their strengths to our customers. Marketing activities, which include advertisements, labelling, product descriptions or publishing studies and comparisons with other products, must clearly and honestly communicate and provide all information useful to be used in making an informed purchasing decision. Haier Europe shall strictly avoid any misleading or deceptive sales strategies. No one should boast of any characteristics of our products that have not been adequately proven.

5. RELATIONS WITH BUSINESS PARTNERS

5.1 ANTI-CORRUPTION AND ANTI-BRIBERY

Haier Europe prohibits all forms of corruption and bribery. The company strictly prohibits giving incentives to others in order to gain business opportunities or benefits.

We are also prohibited from receiving or soliciting advantages from others in business activities. Such incentives include, but are not limited to, cash, favors, negotiable securities, material objects, kickback, travel, entertainment, discounts, or use of a business unit's property without charge.

5.2 ENTERTAINMENT AND GIFTS

We shall not offer or accept gifts and business entertainment exceeding a reasonable limit and value, or which are inconsistent with normal business relations.

Acceptance of entertainment may prevent us from making objective decisions. Unless permissible by law and authorized by senior management, we shall not accept gifts, favors or entertainment of substantial value (i.e. not in line with common sense, expectations and acceptable business practice conventions) that may affect the impartial performance of business.

We shall reject any bribes and avoid acts that may be deemed as receiving bribes.

We (and our family members) shall also refrain from accepting any gifts that may affect our normal course of business with the Company.

We are strictly prohibited from directly or indirectly soliciting gifts, benefits or accepting any kickbacks, commissions, tips, etc.

If a gift may not be rejected due to unforeseen circumstances, this must be reported to the direct supervisor or local HR representative or in accordance with the procedures periodically issued, and declare details of the gift received for relevant review and approval.

5.3 REFERRAL FEES, COMMISSION AND REMUNERATION

At Haier Europe, a transparent and shared process must be followed when authorizing business relationships or recommendations for suppliers or partners to clients or other companies and organizations, such as Haier Europe appointed dealers, cooperative vendors, software companies or financial institutions. Unless transparent assessment procedures for authorization are followed, we shall not make such recommendations or engage such partners, and shall not receive referral fees, commissions or remunerations from such partners.

5.4 INTERNATIONAL TRADE CONTROL

In consideration of national security and diplomatic or humanitarian policies, many countries implement import and export control or trade sanction measures to limit transactions with certain countries, persons or entities, as well as the transactions of some end-use applications (such as the R&D of biological, chemical and nuclear weapons). The consequences of a violation against trade control include the loss of trade privileges and civil or criminal penalties. Whenever our business involves cross-border sales or transportation of products, technologies and services, we must understand and be guided by the most recent applicable trade control laws and sanctions.

5.5 FINANCIAL CRIMES, ANTI-MONEY LAUNDERING AND SANCTIONS

In daily business activities, we shall do our best to not engage in business dealings with criminal suspects or those involving proceeds of crime and sanctions.

If any potential money laundering is found, we shall suspend the transaction, make timely reports to the Group's Legal Department or such other department or person as may be nominated by the Group, and discontinue further transactions whilst the matter is being clarified and resolved.

6. RELATIONS WITH SUPPLIERS

We attract world-class supplier resources by establishing a globally open, transparent,

quick and efficient procurement platform. All the companies cooperating with us must follow relevant national laws and regulations.

With respect to the selection of suppliers, Haier Europe follows the principle of selecting first-class resources amongst available qualified resources. We enhance the users' value through foresight and assess all suppliers impartially through the open information bidding platform, in order to select the optimal suppliers in the Company's best interests, create better user value, and ultimately add brand value.

Employees are prohibited from exerting or trying to exert undue influence, or offer any forms of non-authorized preferential treatment to specific suppliers.

7. RELATIONS WITH COMPETITORS

In market competition, we shall not only create active and effective participation, but also strictly observe laws and business ethics, and demonstrate the products' quality, performance, after-sales service, etc. without misrepresentation, while never defaming or attacking competitors.

We shall rigidly comply with antitrust laws and avoid involvement in agreements (either formal or implicit) with sector companies that could affect free competition, the fixing of sales prices or production volumes, while agreeing on sales areas or customers to be served.

Our participation in trade associations, consortia, or other sector bodies is not aimed at influencing the market, and we should avoid any conduct which may give this erroneous impression.

8. RELATIONS WITH GOVERNMENTS AND PUBLIC ADMINISTRATION

Haier Europe's business activities may involve the public administration and their related offices. We place great importance on mutual support and cooperation with such bodies, observe the laws and regulations on transactions with them, and shall provide them with timely and accurate data and information.

In transactions (both with related businesses as well as in requesting authorizations and licenses) with the public administration (as well as with public servants), anyone participating in the project shall understand the terms and conditions and ensure the timely performance of obligations.

We are bound to conduct our duties with any public administrations, their related entities or personnel at arm's length and shall refrain from providing any benefits such as bribes, gifts or preferential treatment.

9. COMPANY REPUTATION

We are a dynamic company with a strong sense of mission and responsibility. We must actively safeguard the Company's reputation, image and interests.

10. CONFIDENTIAL AND PRIVILEGED INFORMATION

In general, when each Company of Haier Europe is involved, information shall be provided only if accurate and provided by authorized personnel.

Considering that the Haier Europe Group includes listed entities, confidential information may be considered “privileged” if known to the public. Therefore, no unauthorized communication shall be made to the media, investors or the public or disclose it, not even for advising others. Employees are not allowed to use any internal information for direct or indirect gain.

We must abide by the Company's information security policies and take effective measures to protect such confidential information and documents. No one can disclose the company's confidential information or use such information without a proper authorization by the Company or legislation.

While performing the tasks entrusted to them, all of Haier Europe’s personnel are required to properly manage privileged information, and know and comply with corporate procedures relating to market abuse. Insider trading and any behavior that may promote insider trading are expressly forbidden.

11. GOOD CITIZENSHIP IN OUR LOCAL COMMUNITIES

We promote the development and integration of the areas in which we operate, offering work and growth opportunities to local communities. We desire that citizens in areas in which our production facilities and offices are located acknowledge our openness for discussion, and to present our activities and their impact on the area. Where possible, we are committed to fostering not only the local communities' material requirements and needs, but also to sponsor projects for the collective wellbeing.

12. IMPLEMENTATION OF THE CODE

12.1 GOVERNANCE OF THE CODE AND INTERPRETATION

The Board of Directors of Haier Europe is responsible for the application, compliance with and respect of the ethical standards set out herein, as well as the implementation of sanctions for cases of more serious breaches.

Should you have any queries in relation the content of this Code, please contact the Legal

& Compliance team.

12.2 REPORTING VIOLATIONS OF THE CODE

Anyone may report violations of the Code to Haier Europe by the following whistleblowing channels:

- **Haier Global Compliance Hotline**
<https://secure.ethicspoint.eu/domain/media/en/gui/101937/index.html> available via the corporate website and intranet (reporting via this hotline can be anonymous).
- **Email** to 690legal@haier.com
- **Letter to the attention** of the European Internal Audit Department at Candy Hoover Group S.r.l. Via Privata Eden Fumagalli, 20861, Brugherio MB, Italy.

Haier Europe will promptly investigate any report of misconduct and wrongdoing received via the above channels.

The Company will not tolerate, under any circumstances, any form of retaliation against any person who has raised concerns in good faith, and in no case will take or threaten any adverse action or discrimination of any kind against those who report wrongdoings or express concerns regarding ethical issues.

12.3 DISCIPLINARY ACTIONS IN THE EVENT OF VIOLATIONS OF THE CODE

Compliance with the rules of the Code is an essential part of the contractual obligations of all of Haier Europe's personnel pursuant to and in accordance with applicable law.

Any violation of the Code may be deemed a violation of employment contract obligations or a disciplinary offence, and may imply legal consequences.