

Whistleblowing Policy

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0.1 Introduction

On Dec. 29, 2017, Law No. 179 on "Provisions for the protection of the authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship" (published in the Official Gazette, General Series No. 291, Dec. 14, 2017) came into force.

The structure of the measure distinguishes public sector regulations (Art. 1) from private sector regulations (Art. 2), and the provision on the obligation of official, business, professional, scientific and industrial secrecy (Art. 3) has been supplemented.

With regard to the private sector, Article 2 of Law No. 179/17 intervenes on Decree 231 and inserts in Article 6 ("Individuals in top positions and organizational models of the entity") a new provision that frames, within the framework of the Organizational Model under Legislative Decree 231/01, measures related to the submission and management of reports.

The law aims to incentivize worker cooperation to encourage the emergence of corrupt phenomena even within private entities, with the provision of systems that allow workers to safely report any wrongdoing of which they become aware.

In fact, the law regulates:

- The prohibition of retaliatory or discriminatory acts, whether direct or indirect, against the reporter for reasons directly or indirectly related to the report;
- the introduction of sanctions against those who violate whistleblower protection measures, as well as those who maliciously or grossly negligently make reports that turn out to be unfounded;
- the burden on the employer, in the event of disputes related to the imposition of disciplinary sanctions, or to demotions, dismissals, transfers, or subjecting the reporter to other organizational measures having direct or indirect adverse effects on working conditions, subsequent to the submission of the report, to prove that such measures are based on reasons unrelated to the report itself.

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The entry into force of Legislative Decree No. 24/2023-which recalls Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019 implementing Directive (EU) 2019/1937 on the protection of persons who report violations of Union law and contains provisions on the protection of persons who report violations of national regulatory provisions-has introduced significant innovations in the area of whistleblowing, both in the private and public sectors.

With reference to the private sector, the legislation extends the subjective perimeters (who can make a report), objective perimeters (what can be reported) as well as the procedure for overseeing the report under the previous legislation (specifically, in the private sector, Law No. 179/ 2017).

In addition to reports on the Company's internal channels, external reports can be made on the channels operated by ANAC (National Anti-Corruption Authority) under certain conditions, as well as, in specific and detailed cases, public disclosure of the report.

In general terms, there is a sanction system that provides for the possibility for ANAC to intervene in case of non-compliance related to the channels and procedures by which the report is acquired and how it is managed.

Specific identity protection tools, protective measures for the reporting party, and prohibitions against retaliation against the reporting party and those who "facilitate" the reporting are provided.

Haier Europe, in the spirit of giving concrete application to the relevant regulatory provisions in force, as introduced by Law 179/2017 and, subsequently, amended by Legislative Decree 24/2023 - also taking into account the "**Guidelines on the protection of persons who report violations of Union law and protection of persons who report violations of national regulatory provisions. Procedures for the submission and management of external reports,**" finally approved by ANAC, following public consultations, by **Resolution no. 311 of July 12, 2023** - issues this Policy (hereinafter the "**Policy**"), in order to establish the procedures through which to make a report of unlawful conduct, commission or omission, which constitutes

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or may constitute a violation, or inducement to a violation of laws and regulations, values and principles enshrined in the Code of Ethics of Haier Europe and its subsidiaries (hereinafter "Haier" or the "Group"), principles of internal control, Company Policies and standards, and/or which may cause, in the context of relations with one or more Group companies, damage of any kind (e.g. economic, environmental, on the safety of workers or third parties, or even only of image) to the same, as well as to customers, associates, business partners, third parties and, more generally, to the community (hereinafter "**Report**").

If there is definite information or reasonable suspicion based on precise and concordant facts, that any of the above conduct has occurred or may occur, a written or oral report may be made, either anonymously or identifiably, with absolute assurance of confidentiality and privacy at all stages of the proceedings, through any of the channels made available by Haier.

For further questions or concerns, it is suggested that you contact the Legal and Compliance Team.

Thank you for your commitment to compliance with the Policy.

The Legal and Compliance Department

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1. Objectives and Purpose

The purpose of this Whistleblowing Policy ("**Policy**") is to set out how suspected misconduct or wrongdoing may be reported, and how such reports will be processed by Haier Europe and its subsidiaries (hereafter, collectively, "Haier" or, simply, the "**Group**").

This Policy is intended to enable the Group's internal and external Stakeholders to raise concerns and disclose relevant information regarding misconduct or wrongdoing in order to contribute to a safe, healthy, law-abiding and ethical workplace.

Haier is committed to the highest standards of ethical conduct and behavior and encourages the disclosure of any type of misconduct or illegal behavior in violation of the Code of Ethics and Group Code of Conduct, applicable Policies, Procedures and Guidelines, and any regulations deemed applicable.

The objective is not only to prevent the realization of nonconformities or irregularities within the organization, but also to involve all Stakeholders in counteracting illegality through active and responsible participation.

Haier will comply with its obligations to protect the person making a report in accordance with applicable laws and regulations, including the Data Protection Act.

In the event that local laws and regulations are inconsistent with this Policy or impose a higher level of protection than the Policy, those local laws and regulations shall prevail.

2. Target audience

Recipients of this Policy (hereinafter referred to as "**Recipients**" and/or "**Reporting Parties**") are:

- a) members of corporate bodies, Group employees;

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- b) customers, suppliers, partners, consultants, associates and, more generally, the Group's Stakeholders (hereinafter, the "Stakeholders" or, more simply, the "**Third Parties**").

3. Responsibility

3.1. Process Owner

Head of Legal and Compliance.

3.2 Involved Functions

Head of Human Resources.

Internal Control Director.

4. Whistleblowing Policy

Haier is committed to maintaining the highest standards in terms of conduct, integrity and ethical behavior, as summarized in the Code of Ethics and other Group Policies.

The purpose of this Document is to:

- To help create a corporate culture based on transparency and trust;
- remove factors that may hinder or disincentivize reporting, such as doubts and uncertainties about the procedure to be followed and reporters' fears of retaliation or discrimination as a result of reporting;
- provide clear guidance about the channels of communication, the subject matter, and how to make reports, so that everyone knows them and can verify their correct application at any time, minimizing the risk of abuse.

This Policy is, likewise, aimed at creating conditions useful for:

- a) ensure the confidentiality of the identity of the reporter and the alleged perpetrator of the violation (so-called "reported"), without prejudice to the rules governing the

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- initiation of investigations or judicial proceedings, by national authorities, in relation to the facts that are the subject of the report or otherwise disciplinary proceedings initiated by the Company in the case of reports made in bad faith;
- b) adequately protect the bona fide reporting party against any form of retaliation, discrimination or penalization for reasons related, directly or indirectly, to the reporting;
 - c) Initiate necessary action against anyone who makes untruthful reports in bad faith.

This Policy applies to all Reports, internal, external, or public disclosures of reports.

For any doubts or need for clarification regarding the reporting process, please remember to contact the Compliance Officer or the Legal and Compliance Department HQ directly.

4.1 Whistleblowing Reports

4.1.1 Management of Internal Reporting

This Policy, regarding the handling of so-called "Whistleblowing" reports, aims to promote and reinforce Haier's ethical standards and, more generally, Haier's values, by establishing the rules to be applied within the Group in the event of reports of violations that could refer to:

- i. Code of Ethics;
- ii. Code of Conduct;
- iii. Regulations, Policies and internal procedures adopted by the Group;
- iv. Criminal and civil regulations applicable to the Group;
- v. Administrative, civil or criminal accounting offenses;
- vi. conduct relevant under Legislative Decree 231/01 or violation of the requirements of the Organization, Management and Control Models;
- vii. Crimes within the scope of relevant EU or national acts;
- viii. crimes in the areas of public procurement, services, products and financial markets, money laundering prevention, product safety and compliance, transportation safety, environmental protection, food and feed safety, animal health and welfare, public health, consumer protection (antitrust), protection of life and personal data, and network and information system security;

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- ix. Violations of competition and state aid laws;
- x. Violations of corporate tax laws.

Recipients who detect or otherwise become aware of possible unlawful conduct or irregularities put in place, in the performance of their work activities or having an impact on the same, by individuals who have dealings with one or more Group companies, are required to comply with this Policy by reporting, without delay, the facts, events and circumstances that they believe, in good faith and on the basis of serious, precise and concordant factual elements, to have led to such violations and/or conduct that does not comply with Group principles.

Haier encourages Whistleblowers to submit Reports made in good faith and based on facts they become aware of.

To support investigations and to facilitate an appropriate response, Reports should include:

- a) The precise description of the facts (including dates and place);
- b) The people involved in the violation as well as those who can provide information;
- c) supporting documentation.

It is strongly recommended that Reports be submitted through the **Haier Compliance Hotline EthicsPoint**, which allows the following reporting options:

- a) **Anonymous**: The Whistleblower remains totally anonymous;
- b) **Confidential**: the Whistleblower remains anonymous within the Group, but provides details to the EthicsPoint service provider;
- c) **Open**: The Whistleblower provides full details and allows the EthicsPoint service provider to disclose them to the Group. However, the identity of the whistleblower and any other information from which such identity may be inferred, directly or indirectly, may not be disclosed, without the express consent of the whistleblower, to persons other than those competent to receive or follow up on the reports expressly authorized to process such data pursuant to Articles 29 and 32(4) of Regulation (EU) 2016/679, Article 2-quaterdecies of the Code on the Protection of Personal Data under

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Legislative Decree No. 196 of June 30, 2003 (so-called "Designated Persons" or "Authorized" by the Data Controller).

The Group encourages Open or Confidential Reports submitted through the **Haier Compliance Hotline EthicsPoint**, as (i) these facilitate related case management and subsequent communications with Whistleblowers and (ii) under this Policy, Whistleblowers are fully protected by the Group.

However, according to this Policy, the Group will still consider Reports submitted through channels other than the **Haier Compliance Hotline EthicsPoint**, and regardless of whether they are:

- a) **Anonymous**: when the identity of the Whistleblower is neither stated nor otherwise uniquely identifiable;
- b) **Confidential**: when the Whistleblower is known or recognizable, but the Report is not made publicly;
- c) **Open**: when the Report is made through identifiable means, making accessible all details related to the subject of the report and the identity of the reporter, subject to the conditions of Article 12, Legislative Decree 24/2023.

It is the responsibility of the reporter, including anonymous ones, to make **reports in good faith**, and in line with the spirit of this Policy: **reports that are manifestly unfounded, opportunistic and/or made for the sole purpose of harming the** reported person or subjects otherwise affected by the report, **will not be taken into consideration and will be subject to sanctions and/or action before the competent Judicial Authority**.

4.1.1 Content of Reports

Reports should include the following key information:

- a) Place, date and time of the suspected misconduct;
- b) employee(s) involved;
- c) relationship between the reporter(s) and the employee(s) involved;
- d) description of events;
- e) How the Reporter became aware of the reported facts;

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- f) possible presence of witnesses;
- g) other relevant information needed to contextualize the reported event;
- h) attach available evidence to support the report.

4.1.1.2 Objective Profile of Reports

The objective scope of reporting is extensive and includes the following violations:

- Administrative, civil or criminal accounting offenses;
- conduct relevant under Legislative Decree 231/01 or violation of the requirements of the Organization, Management and Control Models;
- crimes within the scope of relevant EU or national acts;
- crimes in the areas of public procurement, services, products and financial markets, money laundering prevention, product safety and compliance, transportation safety, environmental protection, food and feed safety, animal health and welfare, public health, consumer protection (antitrust), protection of life and personal data, and network and information system security;
- violations of competition and state aid laws;
- violations of corporate tax laws.

Only those reports **involving facts or information found directly by the reporter** will be considered, **excluding "personal" complaints or claims.**

They may also not be the subject of reporting, public disclosure or denunciation:

- disputes, claims or demands related to an interest of a personal nature of the reporting person or the person making a complaint to the Judicial Authority that pertain exclusively to his or her individual labor or public employment relationships, or inherent in his or her labor or public employment relationships with hierarchically subordinate figures;
- reports of violations where they are already mandatorily regulated by the European Union or national acts specified in Part II of the Annex to the Decree or by national acts that constitute implementation of the European Union acts specified in Part II of the Annex to Directive (EU) 2019/1937, although not specified in Part II of the Annex to the Decree;

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- reports of national security breaches, as well as procurement related to defense or national security aspects, unless such aspects are covered by relevant EU secondary legislation.

Finally, **they are excluded from the scope of application of the regulations set forth in Legislative Decree 24/2023:**

- disputes, claims or demands related to an interest of a personal nature of the reporting person or the person making a complaint to the Judicial Authority that pertain exclusively to his or her individual labor or public employment relationships, or inherent in his or her labor or public employment relationships with hierarchically subordinate figures;
- reports of violations where they are already mandatorily regulated by the European Union or national acts specified in Part II of the Annex to the Decree or by national acts that constitute implementation of the European Union acts specified in Part II of the Annex to Directive (EU) 2019/1937, although not specified in Part II of the Annex to the Decree;
- reports of national security breaches, as well as procurement related to defense or national security aspects, unless such aspects are covered by relevant EU secondary legislation.

4.1.1.3 Subjective Profile of Reports

Haier, in encouraging Recipients to promptly report possible unlawful conduct or irregularities, guarantees the protection of the confidentiality and identity of the reporter, in relation to the Report and the data contained therein, establishes the prohibition of adopting any retaliatory acts against those who make Reports as well as preserves the anonymity of the reporter or whoever has sent the Report, even in the event that the same should subsequently prove to be erroneous or unfounded.

Protection against acts of retaliation is provided to individuals who are part of the organization and/or related to the person of the whistleblower, be they:

- self-employed workers, partnership holders, freelancers and consultants;
- volunteers and trainees, paid and unpaid;

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- shareholders and persons with functions of administration, department, control, supervision or representation, even if such functions are exercised on a de facto basis.

These measures to protect against acts of retaliation apply extensively to all parties connected, in a broad sense, to the reporting party's organization and/or person, be they:

- facilitators (the people who assist the reporter in the reporting process, operating within the same work environment and whose assistance must be kept confidential);
- persons belonging to the same work environment as the reporter to whom the reporter is related by a stable emotional or kinship link;
- Work colleagues of the reporter who are related to him by a usual and current relationship;
- entities owned by the whistleblower or for which the protected persons work, as well as entities that operate in the same work environment as the above-mentioned persons.

4.1.2 Confidentiality and protection of the reporter

Haier appreciates and encourages **open communication with whistleblowers** and invites them to provide their name and contact information, which allows an open and transparent dialogue to be set up that is useful in providing all the information needed to accurately assess the subject of the report.

The name and the report, including any insights and requests, will be treated **confidentially** and will only be shared with relevant parties if required by applicable local laws and regulations, subject to confidentiality obligations to protect the identity of the reporting person, which provide for the express consent of the same, to persons other than those competent to receive or follow up on the reports expressly authorized to process such data pursuant to Articles 29 and 32(4) of Regulation (EU) 2016/679 and Article 2-quaterdecies of the Personal Data Protection Code set forth in Legislative Decree No. 196 of June 30, 2003.

Confidentiality, in addition to the identity of the reporter, is also guaranteed to any other

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information or element of the report from the disclosure of which the identity of the reporter can be directly or indirectly inferred.

Confidentiality is also ensured in the case of reports - internal or external - made orally through telephone lines or, alternatively, voice messaging systems or, at the request of the reporting person, through a direct meeting with the person managing the report.

The confidentiality of the reporter is protected even when the report is received by personnel other than those authorized and competent to oversee reports, to whom, in any case, the reports should be forwarded without delay.

In two cases expressly provided for by law, in order to disclose the identity of the whistleblower, in addition to the whistleblower's express consent, written notice of the reasons for such disclosure is also required:

- a) in disciplinary proceedings where the disclosure of the identity of the whistleblower is essential for the defense of the person charged with the disciplinary offense;
- b) in proceedings instituted as a result of internal or external reports where such disclosure is also indispensable for the defense of the person involved.

Haier reserves the right to request the reporter's authorization to disclose his or her identity where it is essential for the initiation of disciplinary and/or judicial proceedings against the perpetrator of the reported conduct.

In particular, within the framework of criminal proceedings, the identity of the reporting person is covered by secrecy in the manner and within the limits provided for in Article 329 of the Code of Criminal Procedure; within the framework of proceedings before the Court of Auditors, the identity of the reporting person may not be revealed until the preliminary investigation phase is closed; within the framework of disciplinary proceedings, the identity of the reporting person may not be revealed, if the contestation of the disciplinary charge is based on separate and additional investigations to the report, even if consequent to it. If the charge is based, in whole or in part, on the report and the knowledge of the identity of the reporting person and is indispensable for the defense of

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the accused, the report will be usable for the purposes of disciplinary proceedings only if the reporting person expressly consents to the disclosure of his or her identity.

However, the possibility of **submitting the report in an anonymous form** is guaranteed, which has the same value as the identified one, since it too is marked by a system of so-called "encryption" that favors the "pseudonymization" of the person making the report, in order to ensure the protection of identity secrecy and confidentiality.

Anonymous reports, like identified reports, **must be thoroughly detailed** so that the disputed facts and situations are sufficient to be able to assess their merits and pursue the investigation.

In cases of **anonymous whistleblowing, reporting to judicial authorities, or public disclosure**, if the reporting person is **subsequently identified and retaliated against, retaliation protection measures apply**.

Any kind of threat, retaliation, sanction or discrimination against the Recipients of this Policy as well as expressly referred to in Legislative Decree 24/2023, identified in Section 4.1.1.3, will not be tolerated.

A Whistleblower who has made a report in good faith (*bona fide*) under this Policy is protected against dismissal without cause or unjustified disciplinary action, even if his or her concerns turn out to be unfounded.

Haier reserves the right to take appropriate disciplinary action against any person guilty of retaliating or threatening to retaliate against a Whistleblower, without prejudice to the right of the claimants to legal protection if criminal or civil liabilities related to the falsity of what was stated or reported have been found against the Whistleblower.

The Group may take appropriate disciplinary and/or legal measures to protect its rights, assets and image.

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4.1.3 Confidentiality and protection of the reported person

Haier adopts the same forms of protection provided to guarantee the confidentiality of the identity of the whistleblower even for the person allegedly responsible for the conduct or violation, without prejudice to any legal obligation to disclose the name of the Whistleblower (e.g., in response to requests from the National Judicial Authority).

Haier guarantees the Reported Person, only where such a right is provided for under the law, the right to be informed (within a reasonable period of time) about the allegations and any disciplinary measures against him or her, as well as the right to defense.

4.1.4 False Reports

The Whistleblower shall not report a report knowing that the information is false or misleading, nor shall or submit a report in bad faith. Any abuse of this rule may result in disciplinary action.

Haier reserves the right to proceed against anyone who, in bad faith, has made Reports that are false, unfounded, or opportunistic and/or for the sole purpose of slandering, defaming, or causing harm to the reported person or others named in the Report.

4.1.5 Management of External Reports

The National Anticorruption Authority (ANAC) activates an external reporting channel that ensures, including through the use of encryption tools, the confidentiality of the identity of the reporting person, the person involved, and the person mentioned in the report, as well as the content of the report and related documentation.

The same confidentiality is guaranteed even when the report is made through channels other than those indicated in the first period or reaches personnel other than those in charge of processing reports, to whom it is in any case forwarded without delay.

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External reports are made in written form through the computer platform prepared by ANAC and accessible at the following address: <https://www.anticorruzione.it/-/whistleblowing> or orally through telephone lines or voice messaging systems or, at the request of the reporting person, through a face-to-face meeting set within a reasonable time.

An external report submitted to a person other than ANAC shall be forwarded to ANAC, within seven days from the date of its receipt, giving simultaneous notice of the transmission to the reporting person.

The conditions for making external reporting, as stipulated under Article 6, Legislative Decree 24/2023, occur when:

- a) there is no provision within its work context for the mandatory activation of the internal reporting channel or this channel, even if mandatory, is not active or, even if activated, does not comply with the provisions of Article 4 of the Whistleblowing Decree;
- b) the reporting person has already made an internal report under Article 4 and the report has not been followed up;
- c) the reporting person has reasonable grounds to believe that, if he or she made an internal report, the report would not be effectively followed up or that the report itself might result in the risk of retaliation;
- d) the reporting person has reasonable grounds to believe that the violation may pose an imminent or obvious danger to the public interest.

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4.2 Public Disclosures of Reports

A reporting person who makes a public disclosure benefit from the protection provided by law if, at the time of the public disclosure, one of the following conditions is met:

- a) the reporting person has previously made an internal and external report, or has directly made an external report, under the conditions and in the manner prescribed by the relevant law, and feedback has not been given within the prescribed time limit and on the measures planned or taken to follow up the reports;
- b) the reporting person has reasonable grounds to believe that the violation may pose an imminent or obvious danger to the public interest;
- c) the reporting person has well-founded reason to believe that the external report may carry the risk of retaliation or may not be effectively followed up because of the specific circumstances of the particular case, such as those where evidence may be concealed or destroyed or where there is a well-founded fear that the reporting person may be colluding.

4.3 Verification Activities on the Basis of Reports

Verification activities regarding the substantiation of the circumstances represented in the Report are the responsibility, for the entire Group and subject to any specific local laws on the subject, of the EU Internal Audit Department, which is entrusted with a timely and thorough investigation, in accordance with the principles of impartiality, fairness and confidentiality with respect to all those involved.

In the course of the audits, the EU Internal Audit Department may avail itself of the initial support of the Compliance Officer HQ who, having carried out a *preliminary assessment* regarding the concrete and effective grounds for the report, based on the regulatory requirements, identified pursuant to Legislative Decree 24/2023, and the type and/or subject of the report, contributes to the involvement of the corporate functions from time to time competent and, where deemed appropriate, of external consultants specialized in the field of the report received and whose cooperation is functional to the ascertainment of the same, ensuring the confidentiality and anonymization of any personal data contained in the report.

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Upon the outcome of the verification phase, the EU Internal Audit Department prepares a report summarizing the investigations carried out and the evidence that has emerged (so-called "Report"), sharing it, based on the outcomes, with the Compliance Officer HQ and the corporate functions from time to time in charge, in order to define any intervention plans to be implemented and the actions to be taken to protect the Group, also communicating the results of the investigations and verifications carried out, with respect to each report, to the heads of the corporate functions affected by the contents of the report.

Otherwise, should the conclusion of the analysis reveal the absence of sufficiently circumstantial elements, or, in any case, the groundlessness of the facts referred to in the report, the report will be dismissed, together with the relevant reasons, by the EU Internal Audit Department.

The EU Internal Audit Department reports periodically on the types of reports received and the outcome of investigation activities to Haier's Audit, Risk, Sustainability Governance Committee and Legal and Compliance Department HQ.

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5. Reporting Procedure

The methods of reporting expressly provided for under Legislative Decree 24/2023 are as follows:

- i. In **written form, including computer-based methods** (online platform);
- ii. **orally, alternately through telephone lines, voice messaging systems or face-to-face meeting (upon request).**

If the reporter wishes to report suspected cases of misconduct or wrongdoing, either in an identified form or anonymously¹, **in writing**, he or she may do so through one of the following channels:

1) Haier Compliance Hotline Ethics Point (Corporate Whistleblowing Platform)

Cloud-based digital platform, active 7 days a week, h 24, accessible from any *device* via web.

The Site, which can be reached in both English and Italian, can be found at the following link: <https://secure.ethicspoint.eu/domain/media/it/gui/101937/index.html>.

Reports, made through a digital platform, can be submitted in either English or Italian.

Anyone can report cases of suspected misconduct or wrongdoing by accessing the Haier Compliance Hotline website.

The Haier Compliance Hotline is managed by NAVEX Global, an independent third party appointed by the Corporate Group level (HQD, headquarters).

Anyone who files a report, through the **Haier Compliance Hotline EthicsPoint**, will receive a report identification number. If the reporter so requests, none of his or her personal information will be recorded. After receiving the report, **NAVEX Global** (the Hotline's system) will automatically send an email respectively to the Corporate Legal and Compliance Department, based in Tsingtao, Shandong, China in the HQD and the Office responsible for monitoring and receiving complaints from the **Compliance Hotline**, which is currently the Global Audit & Risk Management ("**GARM**") Office, based in Singapore.

¹ Anonymous reporting may be restricted according to the local laws of the country to which the reporter belongs.

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GARM is:

- independent of individual business units or regional reporting lines and experienced in handling sensitive information and the investigation procedure.
- responsible for receiving and monitoring information from the Haier Compliance Hotline.

The GARM Office will review the report and, in the case of a complaint regarding HQ Italy, the GARM Office will meet with the Internal Audit Department ("EU IA") to arrange the appropriate investigation procedure.

2) E-mail to 690legal@haier.com

This e-mail box is managed by GARM with respect for confidentiality and privacy.

Any report submitted through this e-mail box will be processed in the manner described in the box above under 1).

If, on the other hand, the reporter wishes to report suspected cases of misconduct or wrongdoing, either in an identified form or anonymously, **orally**, he or she may do so through one of the following channels:

3) Telephone hotline, which can be reached from an outside line by dialing the following international toll-free number (ITFS) valid for Italy: 800-877861.

4) Voice messaging.

5) Face-to-face meeting with the Internal Audit Department ("EU IA") - set within a reasonable time - at the request of the reporter.

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In the event that the report, also forwarded anonymously and received through channels 1) 2) 3) and 4), concerns Candy Hoover Group S.r.l., Elba Italy S.p.A., Candy S.p.A.² or EuroPalTners Italia S.r.l.³ and concerns violations of the provisions of Legislative Decree no. 231/2001 (e.g., Violation of Models 231 or risk-offenses pertinent to 231 prerequisite cases) the EU Internal Audit Department will promptly inform the Supervisory Board, appointed pursuant to Legislative Decree No. 231/2001 of the corresponding Group Company, to which the report is referred, in order to coordinate the investigation activity, with the support of the Compliance Officer HQ⁴.

Decisions on such reports and subsequent verification activities, if any, to be activated are the responsibility of the EU Internal Audit Department, in consultation with the Supervisory Board.

² Reports concerning Candy S.p.A. will be handled through the internal channel, prepared in accordance with Legislative Decree 24/2023 and referred to in the Organization, Management and Control Model referred to in Article 6, paragraph 1, letter a) of Legislative Decree 231/2001, of Candy S.p.A. External reports or public disclosures will not be considered applicable.

³ Reports concerning EuroPalTners Italia S.r.l. will be handled through the internal channel, set up in accordance with Legislative Decree 24/2023, and referred to in Article 6, no.1, paragraph 2-bis, Legislative Decree 231/2001. External reports or public disclosures will not be considered applicable.

⁴ The Compliance Officer HQ, within the Legal and Compliance Department:

- **monitors** that the internal **reporting management system** is **correct** and compliant with **legal regulations**, monitoring any regulatory changes and the introduction/amendment of new obligations for the purpose of adapting the system;
- **performs a preliminary substantiation assessment about the report**, supporting the EU Internal Audit Department in handling the report received and coordinating with the Supervisory Board, if the subject and/or content of the report has 231 relevance;
- **supports the EU Internal Audit Department**, in the **handling and resolution of reports**, which is responsible for the completeness, integrity and archiving of the case.

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In the event that the report concerns all the other hypothetical violations mentioned in Section 4.1.1.2, the Internal Audit Department EU may inform the Compliance Officer HQ, in order to be supported in the investigation activity, also involving all other corporate functions concerned.

In the event that the reporter wishes to make the report to his or her direct supervisor or anyone else within the organization, the recipient **MUST** report the report immediately through the official channels mentioned above and without sharing the information with anyone within the organization. Sharing information through unofficial channels could affect the results of the investigation.

Regardless of the channel chosen, the report will be managed **promptly, confidentially, and professionally.**

For greater efficiency in the management procedure, **it is strongly recommended that reports be submitted through the digital platform "Haier Compliance Hotline EthicsPoint."**

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6. Investigation Procedure

All reports will be taken seriously by the Society.

As part of the management of internal reporting channels, the Internal Audit Department EU - promptly alerted by the GARM Office - with the support of the Compliance Officer HQ and the involvement of the Supervisory Board, if the report concerns violations relevant to Legislative Decree 231/2001, conducts the following activities:

- a) issues the reporting person with an acknowledgement of receipt of the report within seven days from the date of receipt;
- b) Maintains interlocutions with the reporting person and may request additions from the reporting person, if necessary;
- c) From diligent follow-up to the reports received;
- d) provides acknowledgement of the report, within three months from the date of the acknowledgement of receipt or, in the absence of such acknowledgement, within three months from the expiration of the seven-day period from the submission of the report;
- e) makes available clear information on the channel, procedures and preconditions for making internal reports as well as the channel, procedures and preconditions for making external reports.

The aforementioned information shall be displayed and made easily visible in workplaces, as well as accessible to persons who, while not attending workplaces, have a legal relationship with Haier.

Each report will be analyzed to assess whether or not an investigation is necessary.

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As indicated in the last paragraph of paragraph 5, in the event that the report concerns Candy Hoover Group S.r.l., **Elba Italy S.p.A.**, **Candy S.p.A.**⁵ or **EuroPalTners Italia S.r.l.**⁶ and **relates to violations of the provisions of Legislative Decree 231/2001 (e.g., Violation of Models 231 or crime risks pertinent to 231 prerequisite cases)**, the Supervisory Board will be promptly informed.

Decisions on these reports and subsequent verification activities, if any, to be activated are the responsibility of the EU Internal Audit Department, which, supported by the Compliance Officer HQ and coordinating with the SB, initiates the necessary investigations and any investigation activities.

In the event that the report concerns all the other cases of violations mentioned in Section 4.1.1.2, the Internal Audit Department EU may inform the Compliance Officer HQ, in order to be supported in the investigation activity, also involving all the other corporate functions concerned.

Reports involving violations of the Antitrust Law as well as the Antitrust Compliance Program will be promptly reported to the Antitrust Compliance Officer, who **will initiate the necessary investigations and investigation activities, supported by the Compliance Officer HQ and coordinated by the EU Internal Audit Department.**

Decisions on these reports and any subsequent verification activities to be activated are the responsibility of the EU Internal Audit Department.

⁵ Reports concerning Candy S.p.A. will be handled through the internal channel, prepared in accordance with Legislative Decree 24/2023 and referred to in the Organization, Management and Control Model referred to in Article 6, paragraph 1, letter a) of Legislative Decree 231/2001, of Candy S.p.A. External reports or public disclosures will not be considered applicable.

⁶ Reports concerning EuroPalTners Italia S.r.l. will be handled through the internal channel, set up in accordance with Legislative Decree 24/2023, and referred to in Article 6, no.1, paragraph 2-bis, Legislative Decree 231/2001. External reports or public disclosures will not be considered applicable.

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7. Conflict of Interest

The procedure ensures that the handling of reports is entrusted to individuals who do not have a conflict of interest.

If the report concerns an allegation of misconduct or wrongdoing referable to one or more of the members of the Internal Audit Department EU, Compliance Office HQ or the Supervisory Board (Legislative Decree 231/2001), the individuals concerned will be denied access to the report.

This control mechanism, aimed at preventing the mishandling of reports, is guaranteed by the GARM Office, which will avoid from the outset the involvement of those individuals in a position of conflict of interest.

In particular, the report relating to the EU Internal Audit Department or Compliance Office HQ will be addressed directly to the CEO, who will manage the report following the criteria of this Policy; the report relating to a member of the Supervisory Board will also be addressed to the attention CEO; in the case of a report relating to misconduct or wrongdoing referable to one or more members of the Board of Directors or the management body of a sister company, the GARM, with the support of the General Counsel, will manage the report by promptly notifying the CEO.

These provisions will also apply if a conflict of interest arises at a stage after the receipt of the report, with the replacement of persons involved in the respective roles according to the above rules.

All conflict-of-interest situations must be declared without hesitation.

8. Processing of Personal Data

Haier informs that the personal data (including any special categories of data, such as racial and ethnic origin, religious and philosophical beliefs, political opinions, membership of political parties, trade unions, as well as personal data apt to reveal the state of health and sexual orientation) of the Reporting Parties and of other persons who may be involved, acquired in connection with the

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management of the Reports, will be processed in full compliance with the provisions of the regulations in force on the protection of personal data and in any case in line with the provisions of the Haier Europe Data Privacy and Protection Policy of the Group, which can be consulted at the following address via SharePoint: ([Haier Europe Data Protection Policy](#)), of the Privacy Policy to the full consultation of which please refer to the Corporate Website, and limited to those strictly necessary to verify the validity of the Report and for the management of the same.

The processing of personal data will be carried out by the Internal Audit EU Department as authorized entities for processing (subject to any specific local regulations on the matter), for the sole purpose of implementing the procedures established in this Policy and, therefore, for the proper management of the

Reports received, in addition to fulfilling legal or regulatory obligations in the full

Respect for confidentiality, fundamental rights and freedoms, and the dignity of those concerned.

Processing operations will be entrusted, under the supervision of the EU Internal Audit Department, to employees duly appointed as "designated" or "authorized" persons and specifically trained in relation to the execution of whistleblowing procedures, with particular reference to security measures and the protection of the confidentiality of the persons involved and the information contained in the Reports.

The personal data contained in the Reports may be communicated by the Internal Audit EU Department to the corporate bodies and internal functions that may be competent from time to time, as well as to the Judicial Authority, for the purpose of activating the procedures necessary to guarantee, as a result of the Report, appropriate judicial and/or disciplinary protection against the reported subject(s), where the elements collected and the investigations carried out reveal the grounds for the circumstances initially reported. In some cases, the data may also be communicated to specialized external parties as described in Section 5.

During the activities aimed at verifying the validity of the Report, all necessary measures will be taken to protect the data from accidental or unlawful destruction, loss, and unauthorized

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disclosure. In addition, documents related to the Report will be retained, both in paper and electronic format, for a period no longer than necessary for the proper finalization of the procedures established in this Policy.

9. Issuance and revision of Policy

This Policy is issued by the Legal & Compliance Department, published and made available to all employees. The Legal & Compliance Department has the right to revise, replace and amend the Policy.

This Policy is also shared with the Company Trade Union Representatives referred to in Article 51 of Legislative Decree No. 81 of 2015, pursuant to Article 4 of Legislative Decree 24/2023.

If you have any questions about this Policy, please contact the Compliance Officer HQ or the Legal and Compliance Department.

10. Violations of the Policy

In the event that Haier Europe is made aware of any violations of this Policy or any event or circumstance that gives rise to an actual or suspected violation of any law relating to sanctions or business controls by any of its employees or business partners, it will initiate an internal investigation and involve law enforcement and other appropriate authorities as necessary.

All Employees are responsible for compliance with this Policy and any other documents designed to implement it.

Where a disciplinary offense is found to have been committed, in violation of this Policy, a penalty appropriate to the type of violation committed and the position held and/or the duties performed by the perpetrator will be imposed on the individual responsible.

The type and size of the penalty shall also be proportionate to the seriousness of the established fact and shall be determined considering:

- a) the manner of the conduct;

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- b) the harmful consequences and/or risks involved;
- c) the willful or negligent nature of the violation and the intensity or degree of the subjective element;
- d) the behavior following the violation;
- e) the responsible person's disciplinary record, if any;
- f) the possible commission of multiple violations with the same conduct;
- g) the possible complicity of more than one person in the commission of the violation.

Penalties applicable to directors

In the event that it is determined that one of the violations listed in Article 3 has been committed by a director of the Company, considering the seriousness of the act and the other criteria set forth in Article 5, one or more of the following sanctions will be imposed:

- i. the statement of censure recorded in the minutes of the board meetings;
- ii. the formal warning;
- iii. the revocation of any proxies given to the director;
- iv. the convening of a shareholders' meeting to adopt a resolution to remove a director from office, constituting, the violation established, just cause for removal from office.

In the event that the violation is ascertained against a director who is also linked to the Company by a subordinate employment relationship, in addition to the sanctions referred to in this Article 6, one or more of the sanctions referred to in Article 8 below may be imposed, if the conditions are met. In such a case, if a dismissal for just cause is adopted, a shareholders' meeting must be convened to adopt a resolution to dismiss the director for just cause.

Penalties applicable to mayors

In the event that it is ascertained that one of the violations listed in Article 3 has been committed by an auditor of the Company, considering the seriousness of the act and the other criteria set forth in Article 5, one of the following sanctions will be imposed:

- i. The statement of censure recorded in the minutes of the meetings of the board of auditors;
- ii. the formal warning;

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- iii. the convening of the shareholders' meeting to adopt a resolution to dismiss the office for cause, subject to the approval of the court constituting, the established violation, just cause for dismissal of the office.

Penalties applicable to managers

In the event that it is ascertained that a disciplinary offence has been committed by a manager of the Company, the sanction deemed most appropriate shall be imposed in accordance with the provisions of current legislation and the applicable National Collective Labor Agreement, considering the seriousness of the act and the other criteria set forth in Article 5.

In particular, if the disciplinary offense constitutes a crime or, in any case, is so serious as to irreparably damage the relationship of trust with the Company, the perpetrator will be subject to dismissal for just cause.

Penalties applicable to other employees

In the event that it is established that a cadre, employee or worker of the Company has committed a disciplinary offense, considering the seriousness of the act and the other criteria set forth in Article 5, one of the following sanctions shall be imposed:

- i. the oral warning;
- ii. the admonition;
- iii. a fine of not more than three hours' hourly pay calculated on the minimum wage scale;
- iv. suspension from work and pay up to a maximum of three days;
- v. dismissal, with or without notice.

The warning consists of a verbal dispute of the offense and a warning against repeating it.

Admonition consists of a written challenge and censure of the offense.

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Penalties applicable to Third Parties

In the event that it is ascertained that a violation among those indicated in Article 3 has been committed by Third Parties, a warning will be issued to prompt compliance with the Model, the Code of Ethics and other supplementary or implementing provisions, or the activation of the remedy provided for in the contracts that bind the Third Parties to the Company deemed most appropriate, taking into account the seriousness of the fact and the other criteria set forth in Article 5.

Remedies that may be provided in contracts that bind the Company to Third Parties include but are not limited to and in order of severity, warning, application of a penalty, suspension and early termination of the relationship.

Proceedings applicable against managers and other employees

The Company's Human Resources Department is the competent body to impose disciplinary sanctions against all employees, in accordance with the procedure set forth in Article 7 of the Workers' Statute and the applicable National Collective Agreement.

This procedure shall also apply where it is reported that a disciplinary offence has been committed by a director also linked to the Company by a contract of employment. If, as a result of the proceedings, the sanction of dismissal is imposed, the board of directors shall convene the shareholders' meeting without delay for the adoption of the revocation measure.

Proceedings applicable against directors and auditors

In the event of a violation under Article 3 by one or more directors not in an employment relationship with the Company and/or auditors, the supervisory body will inform the board of auditors and the board of directors.

Unless there are special reasons for urgency, within fifteen days of receiving the report from the supervisory body, the board of directors shall summon (by written notice) the alleged violator to appear at a board meeting. The summons must be in writing and signed by the chairperson of the board of directors or at least two directors not involved in the disciplinary proceedings. In the

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event that the alleged violator is the chairperson of the board of directors and/or there are not at least two directors not affected by the disciplinary proceedings, the board meeting will be convened by the chairperson of the board of auditors.

At the meeting, which the members of the board of auditors and the supervisory body are also invited to attend, the alleged perpetrator of the disciplinary offense will have the right to defend himself or herself orally and by submitting any written deductions.

The board of directors, even after further investigation as deemed appropriate, will rule either to dismiss or to apply a disciplinary sanction, giving reasons for the decision.

In case of proceedings against a director of the Company, the board of directors will deliberate with the abstention of the alleged perpetrator of the disciplinary offense.

A copy of the minutes of the meeting will be sent to the person concerned as well as to the supervisory body.

Procedure applicable against Third Parties

Disciplinary sanctions are imposed against Third Parties by the director of the organizational unit of the Company managing the contractual relationship concerned.

Specifically, within ten days of receipt of the report, the director of the organizational unit that manages the contractual relationship, in agreement with the legal function - after notifying the contractual counterparty and, if different, the alleged perpetrator of the disciplinary offense - activates the contractual remedies provided for in the contract that binds the Third Party to the Company deemed most appropriate.

The disciplinary measure

The measure by which the disciplinary sanction is applied must be adequately justified. It must in all cases be communicated to the supervisory body.

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Disciplinary measures are communicated by the personnel department to the person concerned.

Haier's HR Department HQ keeps track of sanctions imposed by establishing and updating the register of disciplinary sanctions imposed.

Filing of proceedings

Any filing must be justified and communicated to the supervisory body.

When the report of disciplinary infraction concerns a director of the Company, the decision to dismiss must be communicated to the Board of Auditors and the Shareholders' Meeting.

Retention of documentation

The Board of Directors shall ensure the preservation of all documentation regarding pending and concluded disciplinary proceedings, including archiving, ensuring its confidentiality pursuant to Regulation No. 2016/679 and Legislative Decree No. 196/2003 (as subsequently amended by Legislative Decree No. 101/2018).

Without prejudice to the above-mentioned liability profiles, ANAC shall apply the following administrative pecuniary sanctions to the person in charge:

- a) 10,000 to 50,000 euros when it determines that retaliation has been committed or when it determines that the report has been obstructed or attempted to be obstructed or that the duty of confidentiality under Article 12 has been violated;
- b) 10,000 to 50,000 euros when it determines that reporting channels have not been established, that procedures for making and handling reports have not been adopted, or that the adoption of such procedures is not in accordance with those referred to in Articles 4 and 5, and when it determines that the verification and analysis of the reports received has not been carried out;
- c) 500 to 2,500 euros, in the case referred to in Article 16, paragraph 3, unless the reporting person has been convicted, even at first instance, of the crimes of defamation or slander or otherwise of the same crimes committed with the report to the judicial or accounting authority.

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Entities in the private sector referred to in Article 2, paragraph 1, letter 1, number 3), shall provide in the disciplinary system adopted pursuant to Article 6, paragraph 2, letter e), of Decree No. 231 of 2001, sanctions against those they ascertain to be responsible for the offenses referred to in paragraph 1.

11. Entry into force

This Policy became effective on the date of its publication.
Notwithstanding this date, Recipients shall fully comply with this Policy.

12. Update

The Legal and Compliance Department has the right to update the Policy, in case of the entry into force of regulatory updates, changes in corporate organizational structures and organize training sessions on its content.

13. Table of revisions

Rev	Pages	Dates	Updates and/or Modifications Description
A	ALL	30/06/21	First version
B	5	09/03/22	Second version that incorporates the regulatory changes introduced by the entry into force of Law 179/2017, on "Provisions for the protection of the authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship," and introduces the following new features: (i) Confirmation of reporting within 7 days (ii) Reporting by the reporter to the supervisor

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C	ALL	12/07/2023	Third version that incorporates the regulatory changes introduced by the entry into force of Legislative Decree 24/2023, implementing the EU Directive 1937/2019 of the European Parliament and of the Council of October 23, 2019, on the "Protection of Persons Reporting Violations of Union Law", considering the ANAC Guidelines, issued by Resolution No. 311 of July 12, 2023.
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