



## Group Policy

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### Whistleblowing Policy

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**Scope:**

This Policy applies to Ariston Holding N.V. and its subsidiaries (collectively, "Ariston Group" or the "Company") and the directors, officers and employees of such entities as well as those acting for or on behalf of such entities (collectively, "Covered Persons").

**Purpose:**

The Company has established multiple channels of communication by which whistleblowers can report potential unethical behavior. This Policy describes those channels of communication and through this document, the Company affirms its commitment to protect confidentiality of Whistleblowing reporting, as well as to protect the Whistleblower from any retaliatory or discriminatory act.

Retaliation of any type against a person who reports an unethical behavior will not be tolerated.

**Definitions for the purpose of this Policy:***What is a whistleblower?*

A whistleblower is a person who informs and shares his/her knowledge on any unethical behavior, which he/she thinks, is involving the Company or its representatives.

A whistleblower can be a Company stakeholder, directors, officers, employee, a former employee, a candidate for employment, a supplier, a consultant, a customer, consumer, business partners and third parties etc..

*What is an unethical behavior?*

Whistleblowing concerns severe or extensive acts or omissions that do not exclusively concern personal interests and form part of a pattern or are of a structural nature and concern suspected or alleged (i) violations of business ethics as outlined in the Code of Ethics, (ii) breach of any policy of the Group, (iii) Breach of Law, (iv) misconduct that forms a risk for public interest, (v) financial and accounting fraud, and/or (vi) (sexual) harassment, intimidation, aggression or discriminatory behavior towards employees or third parties.

*What is a Retaliation?*

Any of the following actions taken against the Whistleblowers, directly or indirectly, connected to their reporting activity. Retaliation could be, without limitation to:

- discharge or suspension;
- demotion;
- withholding a promotion;
- a negative assessment;
- a written reprimand;
- transfer to a different office; or location
- discrimination

*What does good faith mean?*

It means that the Whistleblowers should have reasonable grounds to believe, in light of the circumstances and the information available to them at the time of reporting, that the matters reported by them are true (even if the report results inaccurate or not true, at the conclusion of preliminary or final investigation).

**Policy:***Principles*

The Company is committed to high ethical standards and compliance with all applicable laws in all of the jurisdictions in which it operates. Ariston Group encourages the reporting of unethical behavior. This allows the Company to investigate the matter and take corrective actions. Such actions allow the Company to reduce the risk or damage, which could effect on people, the Company, or the communities in which we operate.

Anyone who is aware of any unethical behavior has a duty to report the matter.

People who do not comply with this duty are held liable of breaching the transparency principles of Ariston Group's Code of Conduct, which is a binding document for all of us.

Whistleblowers should feel comfortable in reporting issues of unethical behavior.

Retaliation of any type against a person who, in good faith, brings forward a concern will not be tolerated.

Anyone who attempts to retaliate against a person for speaking up will face disciplinary measures, which may include termination. If a Whistleblower suspects retaliation against himself/herself or any Company employee or other person for speaking up in good faith, he/she should report it.

In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes intentional malicious or vexatious allegations (bad faith), and particularly if she/he persists with making them, Disciplinary Action may be taken against that individual.

#### *Reporting a case*

Ariston Group has established different ways for (a) the confidential reporting, including anonymous ones where allowed by law and (b) the receipt, retention and investigation those reports.

Indeed, reports of possible unethical behavior can be made in the following manners:

- i. In writing through (a) the official Group web site: [www.aristongroup.com/en/governance/whistleblowing](http://www.aristongroup.com/en/governance/whistleblowing) and (b) the dedicated whistleblowing platform: <https://aristongroup.integrityline.com/?lang=en>
- ii. Orally via telephone or any alternative voice-messaging systems (e.g. our whistleblowing platform allows the voice recording, <https://aristongroup.integrityline.com/?lang=en>); and
- iii. If so requested by the Whistleblower, by means of a conversation in person, within a reasonable time after the request has been submitted.

In addition to the Whistleblowing Platform, Company managers, Legal & Compliance personnel and Human Resources representatives have an “open door” policy for reporting compliance concerns and raising questions. Every manager who receives a report is expected to treat the concern or allegation with discretion, and to treat the employee who brought the concern forward with respect. Additionally, if managers need assistance in responding to a reported concern or are unsure about how to handle the report, they are encouraged to contact the Internal Audit Department.

The Company will conduct a comprehensive investigation where the report provides sufficient and objective information.

In connection with all such investigations, confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

A Whistleblowing Internal Committee has been appointed with the responsibility to oversee the Company investigations to ensure they are thorough and accurate, findings are communicated to appropriate parties for consideration of whether corrective action and/or discipline is warranted. Material cases are also reported to the Compliance Committee under the confidentiality and whistleblowers protection principles.

#### **External Reporting:**

Please consider that the applicable law and legislation regarding whistleblowing reporting may be different from Country to Country. In some jurisdiction, the whistleblower may report any unethical behavior externally to the competent Authorities.

Some Countries allows the external reporting under certain pre-conditions some other do not.

Whistleblowers have the responsibilities to refer to local legislation regarding reporting channel, method and competent authorities to which address the report.

The Group assures that no retaliation will take place towards the Whistleblower in relation to the public disclosure of unethical behavior in accordance with local legislation.

#### **References and Guidelines:**

Please consider that the present Policy and related principles are inspired Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of people.