



Group Policy

Whistleblowing Privacy Policy

POLICY REGARDING THE PROCESSING OF PERSONAL DATA, PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 ("GDPR") DERIVED FROM THE SYSTEM ADOPTED BY THE COMPANY TO COLLECT REPORTS OF UNLAWFUL CONDUCT.

GENERAL PROVISIONS

In accordance with the applicable laws on the protection of personal data, including Regulation (EU) 2016/679 ("GDPR"), personal data (such as name, surname, telephone number, e-mail address, function, etc.), that may be provided directly by the Whistleblower and which could also include special categories of personal data (such as racial or ethnic origin, political or religious opinions, etc.) - collectively referred to as "Data" - are collected for providing the services requested by the Whistleblower. The Data may also belong to third parties, including the people who are the subject of the report ("Accused person"). Data and reports will be treated confidentially and conscientiously. The Whistleblower may decide to submit a report anonymously or may choose to let us know their identity. In the event that the Whistleblower opts for an anonymous report, the confidentiality of the user will be guaranteed for the entire procedure and even after its closure. When the Whistleblower submit a report, they are invited to indicate precise facts and to provide objective and detailed elements that allow the validity and truthfulness of the possible violation to be ascertained. Data are processed by Ariston Holding N.V ("Ariston")¹ through personnel duly instructed to do so. For anything else not expressly mentioned here, reference is made to the "Ariston Whistleblowing Procedure" available on the Corporate Web site and company intranet. The terms "personal data", "processing", "data controller", "third party", "supervisory authority" have the same meaning as in Article 4 of the GDPR.

DATA CONTROLLER:

Ariston Holding N.V., with main registered office in Amsterdam (NL) and secondary place of business in Viale Broletto 44, 20121 Milan, VAT number 01527100422 (hereinafter "**Company**").

DATA PROTECTION OFFICER ("DPO"): the DPO can be reached at the following mail address:
DPO.AristonGroup@ariston.com

DATI PERSONALI TRATTATI

Ariston allows to report in a written or orally way through the Whistleblowing digital platform². The Whistleblowing is the reporting or disclosure of information concerning 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 violations of business ethics as outlined in the Code of Ethics or discriminatory behaviour towards employees or third parties ('Unethical Behaviour', could include):

- **Protecting People**
 - Harassment and discrimination
 - Rights and protection of individuals
 - Violation of human rights
 - Serious environmental damage
- **Business Conduct Violation**
 - Bribery and Corruption
 - Conflict of interest
 - International trade controls
 - Competition Law

¹ With the exception of Russia and China. Please refer to the Ariston Whistleblowing Procedure.

² With the exception of Russia and China, managed thought an alternative channels.

- Other breaches of the code of conduct
- **Managing Asset or Information**
 - Manipulation of Group Data
 - Financial Crime
 - Fraud
 - Product safety and quality issues
- **Other**
 - Failure to comply with a legal obligation, regulations or statutes in terms of Unethical behaviour reported in the other categories.
 - Other

Reports can be either nominal or anonymous:

- in the case of anonymous reports, the company's systems will not be able to identify the whistleblower from the portal access point (IP address);
- in the case of written or verbal and nominal reports, upon the choice of the whistleblower, their personal data will be associated to the report. Within the form, made available in the "whistleblowing platform", the whistleblower will be able to indicate their personal data, in the case of nominal reports (and, specifically, personal data and contact details), information pertaining to the relationship with the Controller, the circumstances and description of the fact that is the subject of the report as well as personal data of the accused person and/or any third parties (hereinafter the "Data").

Moreover, the "whistleblowing platform" provides the whistleblower with the possibility, on a completely optional basis, to make reports by voice recording, upon express consent, in which case the Data collected will also include the voice of the whistleblower himself. The "whistleblowing platform" also allows, at the request of the whistleblower, to schedule a direct meeting with the company appointed and expressly authorized departments to process and which have received appropriate operating instructions. The meeting, subject to the consent of the whistleblower, will be documented.

Any whistleblower data indicated are provided directly by the whistleblower; the data of the accused person and/or third parties are provided by the whistleblower.

Any special categories of data (e.g., data pertaining to health status) are not requested by the Data Controller. If they are shared by the whistleblower, they will be processed only if one of the conditions set forth in Article 9 GDPR as indicated below is met; in the absence of such conditions, they will be immediately deleted. The same considerations apply to any judicial data (e.g., data relating to alleged crimes) that you may provide and, therefore, the same will not be considered or will be processed only where required by law pursuant Art. 10 GDPR.

PURPOSE OF PROCESSING

1. Management of detailed reports on unethical conducts or violations, submitted in written or oral form, including investigative activities aimed at verifying the grounds of the reported facts and the adoption of consequent measures as provided for by current disciplinary systems, and/or irregularities within pre-contractual, contractual, or probationary relationships with the Data Controller, or subsequent to the termination of the legal relationship if information on the violations has been acquired during the same legal relationship as required by current legislation. LEGAL BASIS OF PROCESSING: The Data are processed to fulfill a legal obligation to which the Data Controller is subject (Art. 6(1)(c) of the GDPR).
The processing, if any, of special categories of data is based on the fulfillment of obligations and the exercise of specific rights of the Data Controller and the data subject labor law matters, according to Art. 9(2)(b) of the GDPR.

Any data relating to criminal convictions and offenses will be processed only in cases provided for by law, as per Art. 10 of the GDPR.

With regard solely to the reporting through voice recording, the recording will be processed with the express consent of the data subject.

DATA RETENTION PERIOD: The Data is kept as long as necessary for the processing of the report and in any case no longer than 10 years from the date of communication of the final outcome of the reporting procedure, in compliance with confidentiality obligations and the principle set forth in Article 5(1)(e) of the GDPR.

If the report leads to the initiation of a litigation or a disciplinary procedure against the accused person or the whistleblower, the Data will be kept for the entire duration of the litigation or the extrajudicial procedure until the expiration of the terms for appeal actions.

Reports whose content is completely unrelated to the intended use of the whistleblowing channel (for example, complaints, insults, suggestions) are an exception to the aforementioned ten-year retention period and will be deleted within two months from the completion of the analysis, documenting the reasons why they were not considered relevant.

2. If necessary, to ascertain, exercise, or defend the rights of the Data Controller in legal proceedings.

LEGAL BASIS OF PROCESSING: Legitimate interest of the Data Controller pursuant to Art. 6(1)(f) of the GDPR.

Any special categories of data will be processed to ascertain, exercise, or defend a right in court, as provided for in Art. 9(2)(f) of the GDPR.

The processing of data relating to criminal convictions and offenses, if provided, will be carried out only in cases provided for by law pursuant to Art. 10 of the GDPR.

DATA RETENTION PERIOD: The Data will be retained for the entire duration of the judicial proceedings or until the expiration of the terms for appeal actions.

After the aforementioned retention periods have expired, the Data will be destroyed, deleted, or anonymized, in accordance with the technical procedures for deletion, backup, and the Data Controller's accountability.

PROCESSING METHODS

The processing of the Data, with regard to both written and oral reports, will be carried out using paper, electronic, or automated tools ("Whistleblowing platform") with logics related to the aforementioned purposes and in any case in a manner that ensures the security and confidentiality of the Data. Specific security measures are observed to prevent the loss of Data, unlawful or incorrect use, and unauthorized access. In cases where a direct meeting is required, the meeting will be documented, with the prior consent of the data subject, by the personnel in charge through a written report.

MANDATORY OR OPTIONAL NATURE OF DATA PROVISION

The provision of the Data is optional.

In particular, in the case of non-provision of the identifying data of the whistleblower, the report will be made anonymously. The information provided in the report (e.g., circumstances and description of the reported facts regarding the accused person and/or third parties) is necessary to allow the Data Controller to acquire, manage, and initiate any investigative phase.

Special categories of data and/or judicial data are not required by the Data Controller and may be processed, if provided by the whistleblower, only if the above conditions are met. In the absence of these conditions, they will be immediately deleted.

RECIPIENTS OF THE DATA

The Data may be communicated to subjects acting as Data Controllers, such as, for example, judicial authorities and other public entities legitimated to request them, as well as individuals, companies (including those belonging to the Ariston Group), associations, or professional firms providing assistance and consultancy services.

The Data will also be processed, on behalf of the Data Controller, by the provider managing the "Whistleblowing platform" (including the storage of information and Data contained therein) and the provider managing the reports, to whom appropriate operational instructions are given and who are specifically appointed as Data Processors pursuant to Art. 28 of the GDPR.

In exceptional cases, if the Companies initiate a disciplinary procedure against the accused person based solely on the report, the Data of the whistleblower may be disclosed to the accused person exclusively to exercise the latter's right of defense, in compliance with the applicable confidentiality obligations.

PERSONNEL AUTHORIZED TO PROCESS THE DATA

The Data may be processed by members of the Internal Whistleblowing Committee, as well as by personnel, members of the Supervisory Body, Compliance Committee, and Audit Committee, and Internal or external Case Managers within the Ariston Group involved in the management of reports, acting on the basis of specific instructions regarding the purposes and methods of processing and being involved only in strictly necessary cases, while ensuring the absolute confidentiality of the data subjects.

TRANSFER OF PERSONAL DATA

The Data may be disclosed to third parties to comply with legal obligations, to comply with orders from public authorities or to exercise a right in court within the European Economic Area ("EEA") and / or in countries outside the EEA. In the event that, in the context of Ariston contractual relationships, the Data have to be transferred outside the EEA, including by inserting the same in databases managed by third-party companies operating on behalf of Ariston, every suitable and necessary contractual measure will be adopted to guarantee an adequate level of data protection, including - among others - agreements based on standard contractual clauses for the transfer of data outside the EEA, approved by the European Commission. The Data will not otherwise be disclosed and / or transmitted improperly.

RIGHTS OF THE DATA SUBJECT - COMPLAINT TO THE SUPERVISORY AUTHORITY

Through the Platform, the data subject can verify the status of their report. In the case of anonymous reports, it is not possible to exercise the rights set forth in this paragraph since the exercise of these rights requires the identification of the data subject to follow up.

In the case of nominal reports, by contacting the Companies via email at DPO.AristonGroup@ariston.com, data subjects can ask the Data Controller the access to their data, their erasure in cases provided for by Article 17 of the GDPR, the rectification of inaccurate data, the completion of incomplete data, the limitation of processing in cases provided for by Article 18 of the GDPR, as well as the objection to processing for reasons related to their particular situation in cases of legitimate interest of the Data Controller.

In the case of a direct meeting, at the request of the whistleblower, the minutes (drawn up with the prior whistleblower's consent) may be verified, corrected, and confirmed by the reporting party's signature. In the case of an oral report, express consent of the whistleblower will be required, and in the case of transcription of the oral report, it will be possible to verify, correct, or confirm the content of the transcription by the whistleblower's signature.

Data subjects have the right to lodge a complaint with the competent supervisory authority in the Member State where they habitually reside or work or the State where the alleged violation occurred.

In accordance with applicable regulations, the rights set forth in Articles 15 to 22 of the GDPR cannot be exercised if exercising these rights may result in actual and concrete harm to the confidentiality of the identity of the whistleblower reporting an illegal conduct of which they have become aware by virtue of their office.