Whistleblowing Policy

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1. Introduction

Our company is committed to conducting business with integrity, transparency, and respect for applicable laws and internal standards. Speaking up when something does not seem right is a key part of maintaining this commitment.

This Whistleblowing Policy provides a safe and structured way for employees and external stakeholders to report concerns about potential misconduct, unethical behavior, or violations of laws and company policies. Such concerns may relate to issues including fraud, corruption, (sexual) harassment, conflicts of interest, antitrust breaches, data privacy violations, or other serious irregularities.

We encourage all individuals to raise concerns in good faith and as early as possible. Reports can be made through designated channels, including confidential and anonymous reporting options. All reports will be taken seriously, handled promptly, and investigated with appropriate care and independence.

The company strictly prohibits any form of retaliation against individuals who raise concerns in good faith. Protecting those who speak up is fundamental to fostering a culture of trust and accountability.

By promoting openness and responsibility, this policy supports our shared commitment to doing business the right way—every day, in every market where we operate.

2. Objectives and Scope

The objective of this Whistleblowing policy ("WB 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") employees (internal stakeholders) and third parties (external stakeholders).

The WB policy covers all legal entities that collectively form Haier Europe and is relevant to all individuals that have a business relationship with Haier Europe, be it internal or external.

3. Responsibility

3.1 Process Owner

The owner of this policy is the head of the Haier Europe Internal Audit department.

3.2 Involved Functions

The main functions involved are:

- Chief Executive Officer
- Chief Financial Officer
- Head of Human Resources.
- Head of Legal
- Head of Internal Control
- Surveillance Board as appointed under Italian Law 231
- Haier Smart Home Anti-fraud department

4. Haier Europe's Whistleblowing policy: a brief introduction to how it works

The purpose of the WB is:

- Creating a clear path on how to act as whistleblower (or reporter).
- Ensuring the confidentiality of the identity of the whistleblower and the alleged perpetrator of the violation (or reported person);
- Adequately protecting the bona fide whistleblower against any form of retaliation, discrimination or penalization for reasons related, directly or indirectly, to the reporting;
- Initiate necessary action against anyone who makes untruthful reports or reports in bad faith;
- Initiate actions to end identified misconduct or wrongdoings, and initiate remediation actions, as far as possible.
- For any doubts or need for clarification regarding the reporting process, please contact the Haier Europe Internal Audit department, or the local HR business partner.

4.1 Whistleblowing reports

A whistleblowing report is a report of suspected misconduct, unethical behavior, or violations of laws, regulations, or company policies, submitted through a designated reporting channel by a person acting in good faith.

4.1.1 What are genuine whistleblowing reports?

Below is a list of examples or situations that qualify for genuine whistle blowing reports. Please mind below list is not exhaustive:

- Code of Ethics violations, including but not limited to violations of the Haier attitudes, the core ethical values and the Haier Europe Principles (including all types of harassment)
- Substantial intentional breaches of company policies and operating procedures;
- Non-compliance of criminal and civil regulations applicable to the Haier Europe;
- Administrative, civil, or criminal accounting offenses;
- Misconducts relevant under Legislative Decree 231/01 or violations 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.

4.1.2 What are 'bad faith' whistleblowing reports

Whistle blowing reports submitted with malicious intent or in bad faith are strictly prohibited. Examples of such misuse include:

- Knowingly making false allegations;
- Deliberately omitting or distorting key facts to mislead an investigation, submitting reports with the primary purpose of harming a colleague's reputation or career;
- Using the whistleblowing channel to pursue personal grievances unrelated to misconduct.
- Repeated submission of unfounded allegations after prior investigation;
- Reporting matters that the reporter knows to be untrue may also be considered bad faith.

Reporting ‘bad faith’ whistleblowing reports would constitute a breach of the Company’s Code of Ethics and may result in disciplinary action.

4.2 How to make a whistleblowing report

Any whistleblowing report should include as a minumum:

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

You can submit a whistleblowing report using different channels, see for more details chapter 6. Haier offers you a reporting channel through the **Haier Compliance Hotline EthicsPoint** system (see section 6 Reporting procedure), which allows the following reporting options:

- **Anonymous**: The whistleblower remains totally anonymous;
- **Confidential**: The whistleblower remains anonymous within the Haier Group, but provides details to the EthicsPoint service provider;
- **Open**: The whistleblower provides full details about him/herself 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.

Haier Europe encourages open or confidential whistleblowing reports submitted through the Haier Compliance Hotline EthicsPoint, as (i) these facilitate related case management and subsequent communications with Whistleblowers and (ii) under this WB policy, whistleblowers are fully protected by the Group.

However, Haier will still consider also genuine reports submitted through other channels as whistleblowing reports and will treat them with identical care. In case you like to make an external whistleblowing report, please refer to section 4.5 ‘Management of external reports’.

4.3 Protection of whistleblowers

Haier guarantees the protection of the confidentiality and identity of the whistleblower, in relation to the whistleblowing report and the data contained therein. It prohibits any retaliatory acts against those who make whistleblowing reports in good faith, even if the report should subsequently prove to be erroneous or unfounded. Such retaliatory acts may lead to disciplinary actions to the person guilty of retaliation.

Protection against acts of retaliation is provided to all whistleblowers and/or to individuals or entities related to the person of the whistleblower.

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.

4.4 Confidentiality and protection of the reported person

Haier adopts the same forms of protection to guarantee the confidentiality of the identity of the whistleblower for the person allegedly responsible for the misconduct or violation.

Haier guarantees the reported person the right to be informed (within a reasonable period) about the allegations and any disciplinary measures against him or her, as well as the right to defense.

4.5 Management of external reports

Various countries have national channels to facilitate whistleblowing reporting. If you prefer making your report via one of such channels, and your report is in line with the general principles described in section 4.1, Haier Europe will treat such report as a whistleblowing report under this policy with identical care and protection.

For your information, we have highlighted a few relevant external channels.

4.5.1 Italy

The National Anticorruption Authority (ANAC) in Italy has activated an external reporting channel that ensures, including by encryption tools, the confidentiality of the identity of the whistleblower and the persons 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.

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.

The conditions for making external reporting are:

1. the internal reporting channel as described in this policy, is not active or, even if activated, does not comply with the provisions of Article 4 of the Whistleblowing Decree in Italy;
2. the whistleblower has already made an internal report under Article 4 and the report has not been followed up;
3. the whistleblower 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;
4. the whistleblower has reasonable grounds to believe that the violation may pose an imminent or obvious danger to the public interest.

4.5.2 UK

In the UK several authorities exist where whistleblowing reports could be filed. Whistleblowers are protected under the relevant legislation and safeguards provided by those authorities For example, you could report it to the Financial Conduct Authority, the Health and Safety Executive or the Serious Fraud Office, depending on the nature of the concern.

4.5.3 Turkey

In Turkey, some specific attention points are relevant. These are reflected in the appendix of this policy, and also available in Turkish.

4.6 Public disclosures of reports

A whistleblower 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:

1. the whistleblower 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;
2. the whistleblower has reasonable grounds to believe that the violation may pose an imminent or obvious danger to the public interest;
3. the whistleblower 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 case, such as those where evidence may be concealed or destroyed or where there is a well-founded fear that the reported person may be colluding.

4.7 Investigation activities based on Whistleblowing reports

Investigation activities regarding the substantiation of the circumstances represented in the WB report are the responsibility of the Haier Europe 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.

The whistleblower will be informed that an investigation has been started and will be informed when the investigation has been completed. But no details or conclusion of this investigation will be shared with the whistleblower.

In case individuals are being accused of misconduct or other violations, these will be informed on the whistleblowing investigation, with strict adherence to the confidentiality provisions as described earlier in this policy. In case the whistleblowing investigation does not reveal any misconduct or violation, no information will be shared with the accused person on the investigation or the whistleblowing report.

During WB investigations, the Haier Europe Internal Audit department may avail itself of the support of external specialists specialized in the field of the report received, ensuring the confidentiality and anonymization of any personal data contained in the report. Language support may explicitly be included in such external support, in case internal language support would impair objectivity.

Upon the outcome of the investigation, the Haier Europe Internal Audit department prepares a report summarizing the investigations carried out and the evidence that has emerged (so-called "Report"), and shares this with the core members of the Risk & Compliance Committee (the CEO, CFO and the heads of Legal, HR and IC). This committee will design all the actions necessary and will decide on 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 investigation reveal no misconduct or violations, then the WB report will be dismissed, together with the relevant reasons.

The Haier Europe Internal Audit department reports periodically on the types of reports received and the outcome of audit activities to the Haier Smart Home Anti-fraud department, which manages also the Haier Compliance Hotline EthicsPoint system and which is tasked to oversee the proper functioning of the whistleblowing process across the Haier Group.

5. RACI Matrix

Activity	Whistleblower	Reported person	HEIA	Key RCC members (CEO, CFO, CHRO, CLO)	Surveillance Board	HSH Anti-fraud team
Conduct WB investigation	C	I*	A/R	I	I*	I
Decide on improvement or mitigating actions	-	-	C	A/R	I*	I
Decide on disciplinary actions	I**	I**	C	A/R	I*	I

* As far as relevant and/or required
** Only if applicable towards the individual him/herself

6. Reporting procedure

Haier offers four ways to make a whistleblowing report.

6.1 Haier Compliance Hotline (preferred way)

This is a cloud-based digital platform, active 7 days a week, 24 hours a day, accessible from any device via web. It can be reached in both English and Italian via the following link: https://secure.ethicspoint.eu/domain/media/it/gui/101937/index.html.

Although the platform's user interface only supports English or Italian language, reports can be made in any language**.**

Anyone who files a report through the Haier Compliance Hotline will receive a report identification number. At the reporter's discretion, none of his or her personal information will be recorded. After receiving the report, the system will automatically inform Haier Group's Antifraud platform to allocate the report to the correct department for further analysis. In case the WB report is relevant for Haier Europe, the Haier Europe Internal Audit department will be informed to investigate the case.

The Haier Compliance Hotline is managed by NAVEX Global, an independent third party appointed by the Haier Group in Qingdao, China.

6.2 E-mail to 690legal@haier.com

This e-mail box is managed by Haier Group's Anti-fraud platform. Any report submitted through this e-mail box will be processed in the manner described in the box above under 1.

6.3 Telephone service (Italy only)

If you are based in Italy, you can also report via a browser-based call with a human operator, which is available in both English and Italian. Please go to the below link, select 'File a report by phone', select 'Italy' and click the green Connect button.

https://secure.ethicspoint.eu/domain/media/it/gui/101937/index.html.

6.4 Face-to-face meeting with the Haier Europe Internal Audit department

You can request a face-to-face meeting with a member of the Haier Europe Internal Audit department. This meeting can be set within a reasonable time, but - depending on your location - in principle within two weeks**.** Such a meeting can be requested by sending an email to internal.audit@haier-europe.com.

It is advised to use only one of the above channels to ensure your report will be processed timely and in line with the provisions of this policy.

7. Investigation procedure

All reports will be taken seriously by Haier Europe**.** After receiving a WB report, the Haier Europe Internal Audit team will:

- provide the whistleblower with an acknowledgement of report's receipt, within seven days from the receiving date;
- keeps in contact with the reporter and may request additional information from him/her, if necessary;
- give feedback to the whistleblower by notifying him/her of the measures taken to follow up the Report, together with the underlying reasons, in any case within a maximum period of three months from the date of receipt of the Report.

In case the whistleblowing report concerns violations relevant under the Legislative Decree no. 231/2001 (e.g., Violation of Models 231 or risk-offenses pertinent to 231 prerequisite cases) and refers to Candy Hoover Group S.r.l., Elba Italy S.p.A. or Candy S.p.A., Haier Europe Internal Audit will promptly inform the Supervisory Board, appointed pursuant to Legislative Decree No. 231/2001 of the corresponding company.

In case the whistle blowing report concerns violations of the Antitrust Law as well as the Haier Europe Antitrust Compliance Program, the Antitrust Compliance Officer will be promptly informed, who will initiate the necessary investigations and investigation activities.

8. Potential Conflict of interest

The procedure ensures WB report handling 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 Haier Europe Internal Audit department or the Supervisory Board (pursuant to Legislative Decree no. 231/2001), these individuals concerned will be denied access to the report. In case of an involvement of a member of the Haier Europe Internal Audit department, the report will be directly addressed by the Haier Group Anti-fraud team to Haier Europe's CEO, who will manage it following this policy's criteria.

These provisions will also apply if a conflict of interest arises after the report reception, causing people involved to be replaced in the respective roles according to the above rules. All conflict-of-interest situations will be disclosed without hesitation.

9. Processing of Personal Data

Haier confirms that the personal data of the whistle blower and of other persons who may be involved, acquired in connection with the 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 PolicyData retention

Details of the whistle blowing report and the potential connecting investigation will be stored for 10 years, unless relevant jurisdictions prescribe differently.

10. Policy issuance and revision

This WB policy is issued by the Haier Europe Internal Audit department, published, and made available to all employees.

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.

11. Governing Law and Jurisdiction

This WB policy covers all jurisdictions in which Haier Europe operates. The rights and obligations of individual employees under this policy, and in particular any employment-related consequences of a whistleblowing report (including any disciplinary actions, dismissal or retaliation claims), shall be governed by the law of the jurisdiction in which the employee is employed**.**

Where a conflict arises between this global policy and mandatory provisions of the applicable local law, the mandatory local law provisions shall prevail.

12. Changes History

Rev. #	***Revision Date (dd mmm yy)***	***Effective Date (dd mmm yy)***	***Description of Change***	***Created by / Changed by***
A	ALL	30/06/21	First version	Senior Legal and Compliance Specialist
B	5	09/03/22	Second version incorporates regulatory changes introduced by 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:	Senior Legal and Compliance Specialist

			i. Confirmation of reporting within 7 days ii. Reporting by the reporter to the supervisor	
C	ALL	14/06/24	Third version released due to new Business Ethics & Integrity documents references (e.g., ESG Business Code of Conduct) included, DMS encoding due to the new Quality Documents System Management enforcement, Attachment A, B provided.	Senior Legal and Compliance Specialist
D (Rev 2.0 on DMS)	25-Jun-2026	1-Jul-2026	Fully rewritten to improve readability, remove doublures and update for organizational changes, and updated for UK specifics	Head of HEIA

ANNEX A

Turkey Local Protocol

Supplementary Provisions to the Haier Europe Whistleblowing Policy

Pursuant to Turkish Labour Act No. 4857, KVKK No. 6698 and Jurisprudence

This Annex B (Turkey Local Protocol) forms an integral part of the Haier Europe Whistleblowing Policy (HE_P_LEG_02) (the "Policy") and supplements it with provisions specific to employees employed in Turkey. It is issued in accordance with the general principle set out in the Policy that, where mandatory local law requirements differ from or are stricter than the global framework, local law shall prevail.

This Annex gives effect to the requirements of Turkish law -in particular the Labour Act No. 4857 (İş Kanunu), the Law on the Protection of Personal Data No. 6698 (KVKK), and the jurisprudence of the Turkish Court of Cassation on the right of public interest disclosure - and shall be read alongside and not in substitution of the Policy.

This Annex applies to all employees whose employment contract is governed by Turkish law, regardless of their location or the nature of their role within the Haier group.

1. Internal Reporting Priority and the Right of Direct External Disclosure

1.1 Haier encourages employees to make use of internal reporting channels as a first step. However, for employees employed in Turkey, the obligation to exhaust internal channels before making an external report is not absolute.

1.2 An employee may report directly to an external authority without first using internal channels where any of the following conditions is met:

(a) the internal reporting channel is not operational or does not meet the requirements of applicable Turkish law;

(b) the employee has reasonable grounds to believe that an internal report would not be effectively followed up;

(c) the employee has reasonable grounds to fear retaliation as a result of making an internal report; or

(d) the employee has reasonable grounds to believe that the violation poses an imminent or obvious danger to the public interest.

1.3 This principle reflects the jurisprudence of the Turkish Court of Cassation , which has confirmed that the requirement to exhaust internal channels is not a prerequisite for protected external disclosure in every case, and that direct external reporting may be both permissible and necessary depending on the circumstances.

1.4 The relevant external authorities for Turkey are identified in section 4.5.3 of the Policy.

1.5 Relevant External Authorities. In accordance with section 4.5.3 of the Policy and Turkish Court of Cassation jurisprudence, employees in Turkey may file whistleblowing reports directly with the following external authorities, depending on the nature of the concern:

(a) The Personal Data Protection Authority for concerns relating to personal data processing violations under KVKK No. 6698, including unlawful cross-border data transfers.

(b) The Ministry of Labour and Social Security and its inspectorate for concerns relating to labour law violations under the Labour Act No. 4857.

(c) The Public Prosecutors' Office for concerns involving potential criminal conduct.

2. Duty of Loyalty and the Right of Disclosure - Balancing Criteria

2.1 Under Turkish law, an employment contract gives rise to a duty of loyalty on the part of the employee, which requires the employee to protect the legitimate interests of the employer and to refrain from conduct that could cause economic, commercial or reputational harm to the employer. Nothing in this Annex shall be interpreted as permitting the disclosure of information beyond what is reasonably necessary for the reporting of the concern.

2.2 This duty of loyalty does not, however, override the employee's right to report unlawful conduct or serious irregularities to competent authorities where the public interest in disclosure is paramount.

2.3 In assessing whether a whistleblowing report constitutes a protected disclosure or a breach of the duty of loyalty, the following criteria shall be applied:

(a) whether the employee acted in good faith and on the basis of a reasonable belief that the reported conduct constituted a violation;

(b) whether the disclosure was proportionate to the nature and gravity of the reported violation;

(c) whether the public interest served by the disclosure outweighs the employer's interest in confidentiality; and

(d) whether the employee's primary purpose was to remedy a wrong or serve the public interest, rather than to cause harm to the employer.

2.4 Where all of the criteria in Article 2.3 are met, the report shall be treated as a protected disclosure under this Annex and the Policy, regardless of the outcome of any subsequent investigation.

3. Protection of Good-Faith Reports that Prove Unsubstantiated

3.1 A whistleblowing report made by an employee employed in Turkey shall be protected under this Annex and the Policy even if the reported facts subsequently prove to be unsubstantiated or incorrect, provided that the report was made in good faith and on the basis of a reasonable - even if mistaken - belief that the reported conduct constituted a violation.

3.2 The fact that an investigation concludes that no misconduct or violation occurred shall not, by itself, constitute grounds for disciplinary action or termination of employment in respect of the reporting employee.

3.3 Disciplinary action on account of the content of a whistleblowing report shall only be permissible where it is established that the employee:

(a) knowingly reported false information; or

(b) acted with the deliberate intent to cause harm to the employer or to a colleague (bad faith report within the meaning of section 4.1.2 of the Policy).

3.4 This principle is consistent with Turkish Court of Cassation jurisprudence, which has held that an unsubstantiated report does not automatically constitute just cause for termination under Article 25 of the Labour Act No. 4857, and that the absence of substantiation is not equivalent to bad faith.

4. Termination Classification and Statutory Entitlements (Exit Code)

4.1 Where the employment of an employee in Turkey is terminated following a whistleblowing report made by that employee, the classification of the termination and the exit code assigned under the applicable social security and employment regulations shall accurately reflect the legal basis of the termination.

4.2 In particular:

(a) A termination that does not meet the threshold for just cause under Article 25 of the Labour Act No. 4857 shall not be assigned exit code Kod 29 (just cause dismissal).

(b) Where the termination lacks a valid reason or sufficient justification, it shall be treated as a termination without just cause, entitling the employee to severance pay and notice pay (ihbar tazminatı) as applicable under Turkish law.

(c) Where the termination is found by a court or labour arbitrator to constitute retaliatory dismissal following a protected disclosure, the employee shall additionally be entitled to reinstatement or compensation in accordance with Articles 18-21 of the Labour Act No. 4857.

4.3 Haier shall ensure that the exit code assigned upon termination of any employee who has made a whistleblowing report is not influenced by the fact that the employee made such a report, and that the code accurately reflects the legal basis of the termination. The Head of Human Resources in Turkey shall confirm this in writing prior to the registration of the exit code.

5. Scope of the Prohibition on Retaliation (Including Covert Measures)

5.1 For the purposes of this Annex, retaliation shall include not only direct termination of employment, but any adverse employment measure causally linked — directly or indirectly — to the employee's whistleblowing report.

5.2 Without limitation, the following shall constitute retaliation for the purposes of this Annex:

(a) demotion or reduction in grade, title or responsibilities;

(b) reduction of salary, bonus, commission or any other element of remuneration;

(c) exclusion from training, promotion or career development opportunities;

(d) transfer to a different role, location or shift without objective justification;

(e) imposition of unwarranted disciplinary measures or unjustifiably negative performance assessments;

(f) systematic exclusion from workplace communications or decision-making processes; and

(g) any other conduct that creates a hostile, intimidating or materially disadvantageous working environment for the reporting employee.

5.3 The prohibition on retaliation shall apply from the moment a whistleblowing report is made and shall continue to apply following the conclusion of any investigation. The temporal proximity

between a report and an adverse measure shall be taken into account in assessing whether the measure constitutes retaliation.

6. Burden of Proof

6.1 In any internal disciplinary or termination proceeding involving an employee in Turkey who has made a whistleblowing report, where that employee alleges that the disciplinary measure or termination is causally linked to the report, Where a whistleblower establishes facts giving rise to a reasonable inference of retaliation, Haier shall bear the burden of demonstrating that the challenged measure was based on legitimate grounds unrelated to the disclosure.

6.2 This allocation of the burden of proof is consistent with the protections afforded to employees under the Labour Act No. 4857 in cases of dismissal without just cause, and with the principle that the employer - as the party in control of the relevant information and the decision-making process- is best placed to adduce evidence as to the reasons for its actions.

6.3 This provision shall be communicated to all members of the Risk & Compliance Committee and to all members of the Haier Europe Internal Audit department who are involved in the handling of whistleblowing reports relating to employees in Turkey. Documentation of the decision-making process shall be retained for the applicable statutory period.

7. Data Protection and Cross-Border Data Transfers (KVKK)

7.1 **Compliance Framework.** For employees and operations based in Turkey, personal data processed within the scope of this Policy shall be handled in strict compliance with the Law on the Protection of Personal Data No. 6698 (“KVKK”) and the secondary regulations issued thereunder by the Personal Data Protection Authority (“PDPA”). Where the requirements of KVKK are stricter than or differ from the General Data Protection Regulation (GDPR) framework, KVKK shall prevail.

7.2 **Cross-Border Data Transfers.** Any cross-border transfer of personal data collected in Turkey to recipients outside Turkey (including Haier group entities) requires either an adequacy decision by the PDPA or the data subject’s explicit consent. The lawfulness and legal basis of such cross-border transfers must be verified and fully documented prior to processing.

8. Data Retention and Workplace Representation

8.1 **Data Retention Periods.** The retention and storage periods for personal data related to whistleblowing reports in Turkey are governed by KVKK and the PDPA sectoral guidelines:

(a) Where Turkish law prescribes a statutory retention period that is shorter than the standard 10-year period, the shorter period shall strictly apply.

(b) The storage of personal data beyond the statutory period is prohibited unless a specific, documented legal basis is established under KVKK.

(c) Upon expiry of the applicable retention period, personal data shall be erased, destroyed, or anonymised in accordance with the KVKK Regulation on Erasure, Destruction or Anonymisation of Personal Data.

8.2 **Workplace and Trade Union Communication.** For operations in Turkey, this Policy and this Annex shall additionally be shared with the relevant trade union representatives and workplace employee representatives, as required under the Labour Act No. 4857 and the Trade Unions and Collective Labour Agreements Act No. 6356.

9. Final Provisions

This Annex forms part of the Policy and shall be read and applied together with it. In the event of a conflict between this Annex and the Policy, this Annex shall prevail in respect of employees employed in Turkey.

Nothing in this Annex limits any right conferred on an employee by mandatory provisions of Turkish law that cannot be excluded or waived by contract.

This Annex shall be reviewed annually and updated as necessary to reflect changes in Turkish legislation, Cour of Cassaciation jurisprudence, or KVKK regulatory guidance.

This Annex is issued in English. A Turkish translation shall be made available to all employees employed in Turkey. In the event of any inconsistency between the English and Turkish versions, the English version shall prevail unless mandatory local law requires otherwise.