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## 1. Glossary

For the purposes of this Procedure:

- **Anonymous report:** Report in which the personal details of the Whistleblower are not made explicit nor are they uniquely identifiable;
- **De'Longhi Group Personnel:** company top management and members of the corporate bodies, all employees (persons bound by an employment relationship, including managers), collaborators (including interns), including temporary ones;
- **External reporting:** the communication, written or oral, of information on violations carried out by the Whistleblower through the external reporting channel activated by the Italian National Anti-Corruption Authority (ANAC). Pursuant to art. 6, Paragraph 1, of Legislative Decree no. 24/2023, the Whistleblower may make an external Report if one of the following conditions occurs: i) the mandatory activation of the internal reporting channel is not foreseen within their work context or this, even if mandatory, is not active or, even if activated, is not compliant; ii) they have already made an internal Report and it has not been followed up; iii) they have reasonable grounds to believe that, if they made an internal report, it would not be followed up effectively or would lead to retaliatory conduct; iv) have reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest;
- **Facilitator:** the natural person who assists the Whistleblower in the Reporting process and who operates in the same working context and whose assistance must be kept confidential;
- **Information on violations:** information, adequately detailed, including well-founded suspicions, regarding violations resulting from behaviors, acts or omissions committed or which, on the basis of concrete elements, could be committed as well as elements regarding conduct, including omissions, aimed at concealing such violations. This also includes information on violations acquired in the context of a legal relationship that has not yet begun or has ended in the meantime, if such information has been acquired within the working context, including the probationary period, or in the selective or pre-contractual phase;
- **Internal reporting:** the communication, written or oral, of information on violations carried out by the Whistleblower via the internal channel;
- **Organizational Model 231:** the organization, management and control model adopted by De'Longhi Group and its controlled companies pursuant to Legislative Decree no. 231/2001;

- **Person involved:** the natural or legal person mentioned in the Report made through the internal or external channel, complaint, public disclosure, as the subject to whom the violation is attributed or in any case referable;
- **Public disclosure:** placing information on violations in the public domain through the press or electronic means or in any case through means of dissemination capable of reaching a large number of people. Pursuant to art. 15, Paragraph 1, of Legislative Decree no. 24/2023, the Whistleblower may make a public disclosure if one of the following conditions is met: i) they have already made both an internal and external Report, or they have directly made an external Report and no response has been given within the established deadlines regarding the measures envisaged or adopted to follow up on the Reports; ii) they have reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest; iii) they have reasonable grounds to believe that the external Report may involve the risk of retaliation or may not be effectively followed up due to the specific circumstances of the specific case, such as those in which evidence may be hidden or destroyed or in which there is a well-founded fear that the person who received the Report may be colluding with the author of the violation or involved in the violation itself;
- **Report:** all the information provided by the Whistleblower through the reporting channels made available regarding Illegitimate Behavior;
- **Third parties:** natural or legal persons, other than De'Longhi personnel, who have, in various capacities, employment, collaboration or business relationships with De'Longhi and/or with its controlled companies, including - non-exhaustive - customers, partners, suppliers (also under contract/subcontract), self-employed workers or holders of collaborative relationships, freelancers, consultants, agents and intermediaries, volunteers and trainees (paid or unpaid), or anyone who is a legitimate bearer of interest in the corporate activity of the De'Longhi Group.
- **Whistleblower:** the person who reports illicit or non-compliant behavior that occurs within the De'Longhi Group;
- **Work context:** the work or professional activities, present or past, carried out by De'Longhi Personnel or by Third Parties within the legal relationships established by them with De'Longhi Group (hereinafter De'Longhi) and/or with the controlled companies.

## 2. Introduction and purpose

The De'Longhi Group promotes and considers fundamental values, in carrying out its activities, the principles contained in the Group Code of Ethics.

The Group Code of Ethics requires that employees, managers and top management comply with all applicable laws and regulations and carry out their duties with honesty and integrity.

In line with and in addition to the provisions of the Code of Ethics, through this Whistleblowing Procedure, the De'Longhi Group intends to promote and maintain an adequate internal control system with the aim of managing and verifying the methods of carrying out business activities at in order to ensure compliance with national and EU laws as well as company regulatory instruments and spread, at all levels, a culture based on transparency and awareness of the existence of controls as well as on the adoption of a mentality oriented towards conscious and voluntary exercise of the controls themselves.

The De'Longhi Group specifies that this Procedure does not prejudice or limit, in any way, the obligations of reporting to the competent judicial or accounting authorities, nor those of reporting to the control bodies established within the De'Longhi Group.

This procedure (hereinafter Procedure) has the purpose of regulating the process of transmission, reception, analysis and management of Reports (so-called Whistleblowing) - even anonymous - on information, adequately detailed, referable to De'Longhi Group Personnel as an instrument to protect the integrity of the Organization. The recipients of this Procedure may report conduct that is unlawful or does not comply with the Code of Ethics, the internal procedures, the laws and regulations in force, the Organization, Management and Control Model (Organizational Model 231) for the Group companies that have adopted it.

The Procedure is aimed at implementing Legislative Decree 10 March 2023 n. 24, published in the Official Gazette. on 15.03.2023, containing the transposition of Directive (EU) 2019/1937 concerning "the protection of people who report violations of Union law (so-called Whistleblowing discipline)".

This regulation provides, in summary:

- a protection regime for Whistleblowers who provide information, acquired in the work context, relating to violations of national or European Union regulatory provisions that harm the public interest or the integrity of the Organization;

- protection measures, including the prohibition of retaliation, to protect the Whistleblower as well as the Facilitators, colleagues and relatives of the Whistleblower and legal entities connected to the Whistleblower;
- the establishment of internal reporting channels within the Organization (one of which is IT-based) for the transmission of Reports which guarantee, also through the use of encryption tools, the protection of the confidentiality of the identity of the Whistleblower, of the Person involved and/or in any case mentioned in the Report, the content of the Report and the related documentation;
- the right to lodge a complaint with the judicial or accounting authority;
- the possibility (if one of the conditions provided for in art. 6, Paragraph 1, of Legislative Decree no. 24/2023 occurs) to make external reports via the channel managed by the National Anti-Corruption Authority (hereinafter ANAC);
- the possibility of making public disclosures (if one of the conditions provided for in art. 15, Paragraph 1, of Legislative Decree no. 24/2023 occurs), via the press or electronic or dissemination means capable of reaching a large number of people;
- the adoption of disciplinary measures as well as administrative pecuniary sanctions imposed by ANAC.

### **3. Recipients of the Procedure**

The recipients of this Procedure (the "Whistleblowers" or "Recipients") are the subjects connected in the broad sense to De'Longhi Group, and to the Group companies for which it applies, who can make the Report pursuant to the legislation and this Procedure. In particular:

- company top management and members of the corporate bodies;
- people with administrative, management, control, supervisory or representation functions, even if these functions are exercised on a purely de facto basis;
- shareholders (natural persons);
- all employees (people bound by an employment relationship, including managers), collaborators (including interns), even temporary ones;
- self-employed workers, collaborators, freelancers and consultants;
- suppliers;
- clients;

- contractors and other collaborators, i.e. subjects who act in the name and/or on behalf of companies of the De'Longhi Group on the basis of a mandate or other contractual relationship.

The Report can also be made:

- after the termination of the relationship (if the information was acquired during the employment relationship);
- if the legal relationship has not yet begun (if the information was acquired during the selection process or in other pre-contractual phases);
- during the trial period.

The provisions of this document also apply to anonymous Reports, provided they are adequately substantiated, as defined in this Procedure.

The protection against acts of retaliation granted to Whistleblowers pursuant to Paragraph 7 of this Procedure is also extended to:

- facilitators (i.e. the natural persons who provide assistance to the Whistleblower in the reporting process and operate within the work context of the Whistleblower and whose assistance must remain confidential);
- people belonging to the same working context as the Whistleblower bound to them by a stable emotional or family tie within the fourth degree;
- the Whistleblower's work colleagues linked to them by a usual and current relationship.

## **4. Scope**

This Procedure applies to both Italian and foreign companies of the De'Longhi Group.

As regards the details of each individual company for the management of Reports, please refer to the relevant subsection in Paragraph 6.

## **5. Object and content of the Report, exclusions**

The Reports must concern illegitimate behavior (to be understood as any action or omission which occurs in the performance of work activities or which has an impact on the same) which

causes or may cause damage or prejudice to the Group and/or its Employees and /or to public interests - relating to the following areas:

- violations of the Code of Ethics;
- violations of the Organizational Model 231 (for Italian companies that adopt it);
- violations of legislative and regulatory provisions, national and UE, detrimental to a public interest;
- violations of internal procedures.

With regard to the concept of "illegitimate conduct", it is intended, in particular:

a) significant illicit conduct pursuant to Legislative Decree 8 June 2001, n. 231 for Italian companies that have adopted the Management and Control Organization Model (predicate crimes such as, by way of example: undue receipt of grants, fraud to the detriment of the State, a public body or the European Union to obtain public grants, computer fraud to the detriment of the State or a public body and fraud in public supplies, crimes against industry and commerce, corporate crimes, market abuse crimes, fencing, laundering and use of money, goods or benefits of illicit origin, as well as self-laundering, crimes relating to copyright, smuggling crimes, corruption crimes between private individuals, tax crimes, environmental crimes, manslaughter crimes and serious or very serious negligent injuries, committed in violation of accident prevention and hygiene regulations and health at work) or violation of Organizational Model 231;

b) offenses that fall within the scope of application of the European Union or national acts indicated in the annex to Legislative Decree no. 24/2023, or the national acts that constitute the implementation of the European Union acts indicated in the annex of the EU Directive 2019/1937, relating to the following sectors:

- public procurement;
- environmental protection;
- food and feed security and animal safety and welfare;
- public health;
- financial services, products and markets and prevention of money laundering and
- terrorist financing;
- product security and compliance;
- transport security;
- radiation protection and nuclear security;
- consumer protection;

- protection of privacy and protection of personal data and security of networks and information systems;
- c) acts or omissions detrimental to the financial interests of the European Union referred to in Article 325 of the Treaty on the Functioning of the European Union (“TFEU”);
- d) acts or omissions concerning the internal market, referred to in Article 26, Paragraph 2, of the TFEU, concerning the movement of goods, persons, services and capital in the internal market, including violations of the relevant European Union rules competition, State aid, corporate taxes;
- e) acts or behaviors that nullify the object or purpose of the EU provisions referred to in the three previous points (the violations referred to in points b), c), d) and e) considered as "Violation of EU Law").

The Report may also concern:

- well-founded suspicions of commission of the violations indicated above;
- illicit activities not yet carried out which the Whistleblower reasonably believes could be committed on the basis of concrete, precise and consistent elements;
- behavior aimed at concealing the violations indicated above.

The Report must be as precise and accurate as possible, therefore, the Whistleblower, where known, must provide:

- a detailed description of the events that occurred and how they became known;
- date and place where the event occurred;
- names and roles of the people involved or elements that may allow their identification;
- names of any other subjects who can report on the facts being reported;
- reference and attachment of any documents that can confirm the validity of the facts reported.

This Procedure does not apply to Reports relating to violations:

- which do not harm the public interest or the integrity of the Group companies;
- of which you became aware outside the work context;
- regarding a personal interest of the Whistleblower which relate exclusively to their individual work relationships;



- governed by special laws, or regulated by European Union regulations or directives already transposed;
- of national security and defense, as well as procurement in the defense and national security sector.

## **6. Description of the process and responsibilities**

### **6.1 Reporting methods**

The Recipients of this Procedure who detect or otherwise become aware of possible violations reportable pursuant to this Procedure are required to activate this Procedure by immediately reporting the facts, events and circumstances that they believe, in good faith and on the basis of reasonable factual elements, to have determined such violations.

Reports may also be made anonymously but must always be documented and detailed, in order to provide useful and appropriate elements to allow appropriate investigative activity to verify the validity of the facts reported.

The reporting channels that can be used are indicated below:

#### **a) INTERNAL REPORTING CHANNEL**

The Reporter will send the Reports according to the methods described below:

1. In written form, with a voice messaging system or by personal meeting via the protected IT platform, made available in the web available online on the website [www.delonghigroup.com](http://www.delonghigroup.com) provided by the company EQS Group AG (hereinafter "Platform"), for the creation of the Report and the conservation of the same and the related attached documentation, as well as for the conservation and tracking of the management activities carried out (in order to offer the maximum level of confidentiality the reporting channel is managed and guaranteed by an external manager and third party). There is a special FAQ (*Frequently Asked Questions*) section on the Platform which contains the most frequently asked questions. The Whistleblower can also attach supporting documentation to the Report which remains archived in the relevant Report file. The Platform attributes to each Report a

unique identification code and a password generated by the Whistleblower which allows them to access to verify the processing status of the Report.

The Report can be in Italian, English or one of the other languages allowed by the Platform.

The Platform used for Reports complies with Regulation (EU) 2016/679 regarding the protection of personal data ("GDPR") and all data exchanged through this tool will only be available in encrypted form. The encryption and security architecture guarantee the confidentiality and anonymity of the Reports and that no third party, not even EQS Group, has access to the data.

Reports sent using this reporting channel will be managed as indicated in the following Paragraph 6.2.

The choice of the reporting channel is not left to the discretion of the Reporter as, as a priority, the use of the internal channel referred to in this Paragraph is favored and, only when one of the conditions indicated below occurs is it possible to make a Report through the external channel.

In the event that the Whistleblower intends to make a Report through a personal meeting, the person responsible for managing Whistleblowing reports must arrange this meeting within a reasonable time (maximum fifteen days). The meeting, with the consent of the Reporter, may be recorded using devices suitable for storage and listening. In the event that it is not possible to proceed with the registration (for example, because the Reporter has not given consent or because IT tools suitable for recording are not available) it is necessary to write a Report which must also be signed by the Reporter (who will receive a copy of this report), as well as from the person who received the declaration.

If the internal Report is presented, by mistake, with a different method (e.g. PEC) to a person other than the one identified and authorized by the De'Longhi Group for the management of Whistleblowing Reports, and where the Whistleblower expressly declares that they wish to benefit from the protections regarding whistleblowing or this desire can be deduced from the report, the Report is considered a "whistleblowing report" and must be transmitted within 7 (seven) days of its receipt to the Reports manager, giving simultaneous notice of the transmission to the Whistleblower.

If the internal Report is submitted, by mistake, with a method different from the internal reporting channel implemented (e.g. PEC), but to the person identified and authorized by the De'Longhi Group for the management of Whistleblowing Reports, the latter will upload such Report on the designated Platform and will communicate to the Reporter the relevant

identification code of the Report generated by the Platform for the management of communications relating to it.

**b) EXTERNAL REPORTING CHANNEL**

As an alternative to the above, the Whistleblower can make an external Report to the National Anti-Corruption Authority (ANAC), to report the violation of EU law and national transposition legislation, if one of the following conditions occurs:

- the internal communication channel referred to in the previous Paragraph is not active or, even if activated, does not comply with the provisions of national regulations;
- the Whistleblower has already made a Report through the internal channel and it has not been followed up;
- the Whistleblower has reasonable grounds to believe that, if they made a Report through the internal channel, it would not be followed up effectively or that the same Report could lead to the risk of retaliation;
- the Whistleblower has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

The ANAC has activated an external reporting channel, which guarantees, also through the use of encryption tools, the confidentiality of the identity of the Reporter, the person involved and the person mentioned in the Report, as well as the content of the Report and the related documentation.

External Reporting can be done:

- in written form via IT platform;
- in oral form, through telephone lines or voice messaging systems;
- at the request of the Whistleblower, through a direct meeting set within a reasonable time;

as better reflected in the guidelines adopted by the ANAC and published on its website, which also define the procedures for managing external Reports.

The Report forwarded to a person other than the ANAC must in any case be sent to the competent authority within 7 (seven) days of its receipt.

**c) PUBLIC DISCLOSURE**

The Whistleblower can make a Report through public disclosure (i.e. making information on violations public domain), to report the violation of EU law and national transposing legislation, through the press or other means of dissemination capable of reaching a large number of people (such as media and social media), if one of the following conditions applies:

- they have previously made an internal and external Report or have directly made an external Report, and no response has been given;
- they have reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest;
- they have reasonable grounds to believe that the external Report may involve the risk of retaliation or may not have an effective follow-up due to the specific circumstances of the specific case.

**d) REPORT TO THE JUDICIAL OR ACCOUNTING AUTHORITY**

The provisions of this Procedure and in particular the protection measures provided for therein also apply in the event that the Reporting of a violation of EU law and of the national transposition legislation is made by means of a Report to the judicial or accounting authority.

**6.2 Management of Reports****a) All companies of the Group, both Italian and foreign (excluding De'Longhi Appliances S.r.l. and De'Longhi Romania S.R.L.)**

For all companies in the Group, both Italian and foreign (with the exception of De'Longhi Appliances S.r.l. and De'Longhi Romania S.R.L.), the management method is as follows.

The Report, as prescribed in this Procedure, can be made in written form, with a voice messaging system or by personal meeting via the Platform, made available in the web available online on

the website [www.delonghigroup.com](http://www.delonghigroup.com), in which the Whistleblower has the possibility of submitting Reports relating to the following Group companies:

<b>Legal entity name</b>
De'Longhi S.p.A.
E-Services S.r.l.
De'Longhi Braun Household GmbH
De'Longhi Deutschland GmbH
De'Longhi Benelux S.A.
De'Longhi Electrodomésticos España S.L.U.
De'Longhi France S A S
De'Longhi Capital Services S.r.l.
De'Longhi Polska Sp Zo.o
De'Longhi - Kenwood GmbH (Austria)
De'Longhi Kenwood (Hellas) S.A.
De'Longhi Praga SRL
De'Longhi Portugal Unipessoal Lda
De'Longhi Hungary
De'Longhi Hrvatska D.o.o.
De'Longhi America Inc.
De'Longhi Australia Pty Ltd.

De'Longhi Canada Inc.
De'Longhi Japan Corp.
De'Longhi Mexico SA DE CV
De'Longhi New Zealand LTD
De'Longhi Kenwood Korea Ltd.
Capital Brands Holdings Inc.
De'Longhi Scandinavia AB
De'Longhi Appliances Technology Services (Shenzen) Co. Ltd
De'Longhi Kenwood A.P.A. Ltd (Hong Kong)
DL Trading Shanghai Company Ltd
De'Longhi-Kenwood Appliances (DONGGUAN) Co. Ltd.
On Shiu (Zhongshan) Electrical Appliance Company Limited
De'Longhi Kenwood MEIA FZE (UAE)
Kenwood Appliances (Malaysia) SDN.BHD.
Kenwood Appliances Singapore Pte Ltd
De'Longhi South Africa Proprietary Limited
Kenwood Limited
Kenwood Swiss AG
De'Longhi Ukraine LLC
Eversys S.A.

De'Longhi LLC
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The person responsible for receiving and examining Reports for the companies listed in the table is:

- The Whistleblowing Committee (also called “WBC”) made up of personnel belonging to the following functions:
  - Group Internal Audit Management;
  - Group Human Resources Management;
  - Group Legal Affairs Management.

The Whistleblowing Committee has the role of guaranteeing and supervising the integrity, independence and effectiveness of the whistleblowing processes and procedures of the relevant company and holds an adequate role of independence within the Group, being able to access all information and personal data relating to the Reports received.

In relation to Reports of violations relating to Legislative Decree no. 231/2001 (for Group companies that adopt the 231 Organizational Model) the WBC will inform the Supervisory Body for the consequent obligations.

Cases of conflict of interest that arise will be handled as follows:

- if the Report involves one of the members of the WBC, then it will be managed by the other members of the WBC in compliance with the timing, operational methods and principles of confidentiality referred to in this procedure and according to the methods provided on the Platform (the interested member will be prevented from accessing the Report with appropriate settings on the Platform).

The WBC operates by ensuring the maintenance of the necessary conditions of independence and due objectivity, competence, professional diligence and confidentiality towards all parties involved in the Report.

The operational management of the investigative activities resulting from the Reports is attributed to the Whistleblowing Committee.

At an operational level, once a Report has been received, the WBC will have to:

- issue the Whistleblower with a notice of receipt of the Report within 7 (seven) days from the date of receipt;
- maintain discussions with the Whistleblower during the investigation;
- follow up correctly on the Report received, through the collection of any further information/documentation useful for the appropriate assessments, involving, if necessary, the various company functions involved;
- evaluate the information/documentation collected following the Report in order to take the consequent decisions;
- provide feedback to the Whistleblower within 3 (three) months from the date of acknowledgment of receipt or, in the absence of such notice, within 3 (three) months from the expiry of the deadline of 7 (seven) days from the submission of the Report;
- respect, during the management of the investigation activity, the confidentiality of the Whistleblower, of the person reported and of the information in the Report.

The WBC will:

1. preliminarily evaluate the Report (verification of the presence of sufficiently detailed data and information useful for an initial evaluation that excludes the evident unfoundedness of the Report) and, if the Report is not adequately detailed, to request further information from the Whistleblower by means of a specific message inserted on the Platform that the Whistleblower will be able to see using the unique identification code attributed by the Platform itself to the Report;
2. archive the Report if the analysis referred to in the previous point reveals the absence of sufficient elements, the unfoundedness of the Report, or if it appears to have been made in bad faith. The archiving will be accompanied by the relevant reasons;
3. initiate in-depth and investigative activities if sufficient elements emerge or can be deduced from the analysis referred to in the previous point 1 to not consider the Report unfounded.

If sufficient elements emerge or can be deduced not to consider the Report unfounded, the WBC, in carrying out operational investigative activities in compliance with confidentiality, will obtain information, details, documentation from the various corporate functions involved as well as from the reported subject, who may request to be heard regarding the statements made and the evidence provided on the fact which is the subject of the investigation itself.



If, following the outcome of the verification activity, the commission of the event which is the subject of the Report is confirmed, a summary report of the checks carried out and the evidence that emerged is written, in order to share with the governing body (hereinafter, "Governing Body") the adoption of any consequent action (e.g. sanctioning and/or corrective actions). The Governing Body will also evaluate the adoption of actions to protect the Group companies, including in court (e.g. suspension, cancellation of the supplier, judicial actions, disciplinary measures against employees, etc.).

In carrying out these analyses/activities the WBC will be able to:

- inform, depending on the subject matter of the Report, one or more managers of the following functions within the Group:
  - the President of the Control and Risk, Corporate Governance and Sustainability Committee (or an equivalent body);
  - any other person appointed for this purpose by the competent Corporate Bodies;
  - the President of the Supervisory Body, in the event that the company is subject to Legislative Decree no. 231/2001 and the reporting concerns the commission of predicate crimes or violations of the adopted organizational Model;
- make use of other company functions or contact external consultants;
- communicate to the Governing Body the assessment regarding the need to initiate disciplinary proceedings against the Whistleblower in the event of Reports made in bad faith or with defamatory intent.

All the activities as described above and any documentation acquired relating to the Reports are recorded and stored on the Platform, where all the information relating to the Report itself, the investigation conducted and the reports produced are reported in summary form.

## **b) De'Longhi Appliances S.r.l.**

For De'Longhi Appliances S.r.l. the management method is as follows.

The Report, as prescribed in this Procedure, can be made in written form, with a voice messaging system or by personal meeting via the Platform, made available in the web available online on the website [www.delonghigroup.com](http://www.delonghigroup.com), in which the Whistleblower has the possibility of submitting Reports relating to the company De'Longhi Appliances S.r.l..

The person responsible for receiving and examining Reports for De'Longhi Appliances S.r.l. is:

- The Whistleblowing Working Group (also called “WBWG”) made up of:
  - Whistleblowing Committee (also called “WBC”) made up of personnel belonging to the following functions:
    - ❖ Group Internal Audit Management;
    - ❖ Group Human Resources Management;
    - ❖ Group Legal Affairs Management.
  - Whistleblowing Focal Point (also called “Local Focal Point”) identified in an employee of De'Longhi Appliances S.r.l. with a level of knowledge and skills suitable for the role.

The Local Focal Point has the role of guaranteeing and supervising the integrity, independence and effectiveness of the whistleblowing processes and procedures of the relevant company and holds an adequate role of independence within the company, being able to access all information and personal data relating to the reports received.

In relation to Reports of violations relating to Legislative Decree no. 231/2001 (for Group companies that adopt the 231 Organizational Model) the WBC will inform the Supervisory Body for the consequent obligations.

Cases of conflict of interest that arise will be handled as follows:

- if the Report involves the Local Focal Point, then it will be managed by the WBC in compliance with the timing, operating methods and confidentiality principles set out in this Procedure;
- if the Report involves one of the members of the WBC, then it will be managed by the other members of the WBC and the Local Focal Point in compliance with the timing, operational methods and principles of confidentiality referred to in this procedure and according to the methods provided on the Platform (the interested member will be prevented from accessing the Report with appropriate settings on the Platform).

The WBWG operates by ensuring the maintenance of the necessary conditions of independence and due objectivity, competence, professional diligence and confidentiality towards all parties involved in the Report.

The operational management of the investigative activities resulting from the Reports is attributed to the WBWG.

At an operational level, once a Report has been received, the WBWG will have to:

- issue the Whistleblower with a notice of receipt of the Report within 7 (seven) days from the date of receipt;
- maintain discussions with the Whistleblower during the investigation;
- follow up correctly on the Report received, through the collection of any further information/documentation useful for the appropriate assessments, involving, if necessary, the various company functions involved;
- evaluate the information/documentation collected following the Report in order to take the consequent decisions;
- provide feedback to the Whistleblower within 3 (three) months from the date of acknowledgment of receipt or, in the absence of such notice, within 3 (three) months from the expiry of the deadline of 7 (seven) days from the submission of the Report;
- respect, during the management of the investigation activity, the confidentiality of the Whistleblower, of the person reported and of the information in the Report.

The WBWG will:

1. preliminarily evaluate the Report (verification of the presence of sufficiently detailed data and information useful for an initial evaluation that excludes the evident unfoundedness of the Report) and, if the Report is not adequately detailed, to request further information from the Whistleblower by means of a specific message inserted on the Platform that the Whistleblower will be able to see using the unique identification code attributed by the Platform itself to the Report;
2. archive the Report if the analysis referred to in the previous point reveals the absence of sufficient elements, the unfoundedness of the Report, or if it appears to have been made in bad faith. The archiving will be accompanied by the relevant reasons;
3. initiate in-depth and investigative activities if sufficient elements emerge or can be deduced from the analysis referred to in the previous point 1 to not consider the Report unfounded.

If sufficient elements emerge or can be deduced not to consider the Report unfounded, the WBWG, in carrying out operational investigative activities in compliance with confidentiality,

will obtain information, details, documentation from the various corporate functions involved as well as from the reported subject, who may request to be heard regarding the statements made and the evidence provided on the fact which is the subject of the investigation itself.

If, following the outcome of the verification activity, the commission of the event which is the subject of the Report is confirmed, a summary Report of the checks carried out and the evidence that emerged is written, in order to share with the governing body (hereinafter, "Governing Body") the adoption of any consequent action (e.g. sanctioning and/or corrective actions). The Governing Body will also evaluate the adoption of actions to protect De'Longhi Appliances S.r.l., including in court (e.g. suspension, cancellation of the supplier, judicial actions, disciplinary measures against De'Longhi Appliances S.r.l. employees, etc.).

In carrying out these analyses/activities the WBWG will be able to:

- inform, depending on the subject matter of the Report, one or more managers of the following functions within the Group:
  - the President of the Control and Risk, Corporate Governance and Sustainability Committee (or an equivalent body);
  - any other person appointed for this purpose by the competent Corporate Bodies;
  - the President of the Supervisory Body, in the event that the company is subject to Legislative Decree no. 231/2001 and the reporting concerns the commission of predicate crimes or violations of the adopted organizational Model;
- make use of other company functions or contact external consultants
- communicate to the Governing Body the assessment regarding the need to initiate disciplinary proceedings against the Whistleblower in the event of Reports made in bad faith or with defamatory intent.

All the activities as described above and any documentation acquired relating to the Reports are recorded and stored on the Platform, where all the information relating to the Report itself, the investigation conducted and the reports produced are reported in summary form.

### **c) De'Longhi Romania S.R.L.**

For De'Longhi Romania S.R.L. the management method is as follows.

The Report, as prescribed in this Procedure, can be made in written form, with a voice messaging system or by personal meeting via the Platform, made available in the web available online on the website [www.delonghigroup.com](http://www.delonghigroup.com), in which the Whistleblower has the possibility of submitting Reports relating to the company De'Longhi Romania S.R.L..

The person responsible for receiving and examining Reports for De'Longhi Romania S.R.L. is:

- The Whistleblowing Working Group (also called “WBWG”) made up of:
  - Whistleblowing Committee (also called “WBC”) made up of personnel belonging to the following functions:
    - ❖ Group Internal Audit Management;
    - ❖ Group Human Resources Management;
    - ❖ Group Legal Affairs Management.
  - Whistleblowing Focal Point (also called “Local Focal Point”) identified in an employee of De'Longhi Romania S.R.L. with a level of knowledge and skills suitable for the role.

The Local Focal Point has the role of guaranteeing and supervising the integrity, independence and effectiveness of the whistleblowing processes and procedures of the relevant company and holds an adequate role of independence within the company, being able to access all information and personal data relating to the reports received.

In relation to Reports of violations relating to Legislative Decree no. 231/2001 the WBC will inform the Supervisory Body for the consequent obligations.

Cases of conflict of interest that arise will be handled as follows:

- if the Report involves the Local Focal Point, then it will be managed by the WBC in compliance with the timing, operating methods and confidentiality principles set out in this Procedure.
- if the Report involves one of the members of the WBC, then it will be managed by the other members of the WBC and the Local Focal Point in compliance with the timing, operational methods and principles of confidentiality referred to in this procedure and according to the methods provided on the Platform (the interested member will be prevented from accessing the Report with appropriate settings on the Platform).

The WBWG operates by ensuring the maintenance of the necessary conditions of independence and due objectivity, competence, professional diligence and confidentiality towards all parties involved in the Report.

The operational management of the investigative activities resulting from the Reports is attributed to the WBWG.

At an operational level, once a Report has been received, the WBWG will have to:

- issue the Whistleblower with a notice of receipt of the Report within 7 (seven) days from the date of receipt;
- maintain discussions with the Whistleblower during the investigation;
- follow up correctly on the Report received, through the collection of any further information/documentation useful for the appropriate assessments, involving, if necessary, the various company functions involved;
- evaluate the information/documentation collected following the Report in order to take the consequent decisions;
- provide feedback to the Whistleblower within 3 (three) months from the date of acknowledgment of receipt or, in the absence of such notice, within 3 (three) months from the expiry of the deadline of 7 (seven) days from the submission of the Report;
- respect, during the management of the investigation activity, the confidentiality of the Whistleblower, of the person reported and of the information in the Report.

The WBWG will:

1. preliminarily evaluate the Report (verification of the presence of sufficiently detailed data and information useful for an initial evaluation that excludes the evident unfoundedness of the Report) and, if the Report is not adequately detailed, to request further information from the Whistleblower by means of a specific message inserted on the Platform that the Whistleblower will be able to see using the unique identification code attributed by the Platform itself to the Report;
2. archive the Report if the analysis referred to in the previous point reveals the absence of sufficient elements, the unfoundedness of the Report, or if it appears to have been made in bad faith. The archiving will be accompanied by the relevant reasons;

3. initiate in-depth and investigative activities if sufficient elements emerge or can be deduced from the analysis referred to in the previous point 1 to not consider the Report unfounded.

If sufficient elements emerge or can be deduced not to consider the Report unfounded, the WBWG, in carrying out operational investigative activities in compliance with confidentiality, will obtain information, details, documentation from the various corporate functions involved as well as from the reported subject, who may request to be heard regarding the statements made and the evidence provided on the fact which is the subject of the investigation itself.

If, following the outcome of the verification activity, the commission of the event which is the subject of the Report is confirmed, a summary Report of the checks carried out and the evidence that emerged is written, in order to share with the governing body (hereinafter, "Governing Body") the adoption of any consequent action (e.g. sanctioning and/or corrective actions). The Governing Body will also evaluate the adoption of actions to protect De'Longhi Romania S.R.L., including in court (e.g. suspension, cancellation of the supplier, judicial actions, disciplinary measures against De'Longhi Romania S.R.L. employees, etc.).

In carrying out these analyses/activities the WBWG will be able to:

- inform, depending on the subject matter of the Report, one or more managers of the following functions within the Group:
  - the President of the Control and Risk, Corporate Governance and Sustainability Committee (or an equivalent body);
  - any other person appointed for this purpose by the competent Corporate Bodies;
  - the President of the Supervisory Body, in the event that the company is subject to Legislative Decree no. 231/2001 and the reporting concerns the commission of predicate crimes or violations of the adopted organizational Model;
- make use of other company functions or contact external consultants
- communicate to the Governing Body the assessment regarding the need to initiate disciplinary proceedings against the Whistleblower in the event of Reports made in bad faith or with defamatory intent.

All the activities as described above and any documentation acquired relating to the Reports are recorded and stored on the Platform, where all the information relating to the Report itself, the investigation conducted and the reports produced are reported in summary form.

## **7. Prohibition of retaliation - protection of Whistleblowers and subjects other than Whistleblowers, conditions for benefiting from the protections governed by this Procedure**

The Whistleblower will not suffer any discrimination or retaliation (even attempted or threatened) as a result of the Report and any conduct towards the Whistleblower because of their Report will not be tolerated.

In detail, discrimination or retaliation refers to, by way of example but not exhaustively:

- dismissal, suspension or equivalent measures;
- demotion or failure to promote;
- change of functions, change of place of work, reduction of salary, modification of working hours;
- suspension of training or any restriction of access to it, demerit notes or negative references;
- adoption of disciplinary measures or other sanctions, including pecuniary ones;
- coercion, intimidation, harassment or ostracism;
- discrimination or otherwise unfavorable treatment;
- failure to convert a fixed-term employment contract into a permanent employment contract;
- failure to renew or early termination of a fixed-term employment contract;
- damage, including to the person's reputation, particularly on social media, or economic or financial prejudice;
- improper listing on the basis of a formal or informal sectoral or industry agreement;
- early termination or cancellation of the contract for the supply of goods or services;
- cancellation of a license or permit;
- request to undergo psychiatric or medical tests.



Any act of retaliation is void. The burden of proving that such conduct is motivated by reasons unrelated to the Report lies with the companies of the De'Longhi Group.

Whistleblowers who believe they have suffered retaliation can communicate the circumstance to the ANAC, which can instruct the Italian Labor Inspectorate to carry out the relevant investigations and checks.

The adoption of discriminatory measures against the Whistleblower can also be reported to the HR function, to the Italian National Labor Inspectorate, for the measures within its competence, not only by the Whistleblower, but also to the trade union (if applicable) organization indicated by the same.

The protection of the identity of the Whistleblower, the content of the Report and the related documentation and the confidentiality of the information within the limits of the law are guaranteed.

The identity of the Reported Party will be kept confidential at all stages of the Report verification procedure. In particular, it will not be disclosed to the Whistleblower Manager, to the Reported Party or to third parties.

Confidentiality, in addition to the identity of the Whistleblower, is also guaranteed to any other information or element of the Report from the disclosure of which the identity of the Whistleblower can be deduced directly or indirectly. Furthermore, confidentiality is also guaranteed in the case of Reports - internal or external - made via voice messaging systems or, at the request of the Whistleblower, through a direct meeting with the person handling the Report.

The confidentiality of the Whistleblower is protected even when the Report reaches personnel other than those authorized and competent to manage the Reports, to whom, in any case, they must be sent without delay.

In particular, the identity of the Whistleblower and any other information from which such identity can be deduced, directly or indirectly, can only be revealed with the express consent of the same:

- within the disciplinary proceedings, if the dispute is based, in whole or in part, on the Report and knowledge of the identity of the Whistleblower is essential for the defense of the accused party;

- as part of the proceedings established following internal or external Reports, if the disclosure of the identity of the Whistleblower or of any other information from which such identity can be deduced, directly or indirectly, is also indispensable for the purposes of the defense of the Person involved.

Confidentiality is also guaranteed on the identity of the Persons involved and/or mentioned in the Report, as well as on the identity and assistance provided by the Facilitators, with the same guarantees provided for the Whistleblower.

The disclosure (even indirect) of the identity of the Whistleblower, outside of the hypotheses set out above, is to be considered a violation of this Procedure punishable by disciplinary sanction.

The Whistleblower benefits from protection if:

- at the time of the Report they have reasonable grounds to believe that the information on the reported violations is true and falls within the objective scope of this Procedure;
- the Report is made based on the provisions of this Procedure.

The reasons that led the Whistleblower to make the Report are irrelevant for the purposes of their protection.

The Whistleblower is not punishable if, through their Report, reveals or disseminates information:

- on violations covered by secrecy (other than professional, medical or forensic secrecy);
- relating to the protection of copyright or the protection of personal data; or which offend the reputation of the person reported when at the time of the disclosure or dissemination there were reasonable reasons to believe that the disclosure or dissemination of the information was necessary to reveal the violation and the Report was made in the manner established by this Procedure.

When the above hypotheses apply, any further liability, even of a civil or administrative nature, is also excluded.

Unless the fact constitutes a crime, the Whistleblower does not incur any liability, even of a civil or administrative nature, for acquiring information on violations or for accessing them.

The Group reserves the right to take appropriate action against anyone who carries out, or threatens to carry out, acts of retaliation against Whistleblowers or other recipients of this Procedure.

The list of third sector bodies that provide support measures to Whistleblowers is established at the ANAC.

## **8. Record keeping**

The documentation relating to the Reports is confidential and is stored securely and in compliance with the regulations in force within the Group on the classification and processing of information and in compliance with local legislation and regulations. This documentation is archived on the Platform and is accessible only to the members of the Whistleblowing Committee and the Local Focal Points for reports relating to the Group companies they deal with based on their involvement according to the reporting management methods previously described.

The documents will be kept for a period of five (5) years starting from the date of communication of the final outcome of the reporting procedure, or as long as it is necessary by law in the event of judicial proceedings.

In the event that a registered voice messaging system is used for the Report as well as for Reports carried out by personal meeting, the Report, with the prior consent of the reporting person, is documented by those responsible for managing the Reports by recording on a suitable device for preservation and listening or by full transcription into a specific documentary report. The Whistleblower must confirm the contents of the transcript by signing.

## **9. Periodic communications/ Information flaws**

The Whistleblowing Working Group (for De' Longhi Appliances S.r.l. and De'Longhi Romania SRL) and the Whistleblowing Committee (for all other Italian and foreign Group companies) will prepare a quarterly report summarizing the Reports received (also including the investigations that led to the possible archiving of the Report) which they will send to:

- Control and Risk, Corporate Governance and Sustainability Committee;
- Board of statutory auditors for companies based in Italy;
- Supervisory Board of companies with a Supervisory Body for reporting the predicate crimes envisaged by Legislative Decree no. 231/2001.

In addition to the above, whenever the need arises, the Whistleblowing Report managers will be able to Report the cases they deem appropriate to the above-mentioned subjects.

## **10. Disciplinary system**

In light of what has already been indicated in the previous Paragraphs, the De'Longhi Group will evaluate appropriate disciplinary measures against employees who have engaged in unlawful conduct.

Similarly, disciplinary measures will be taken against Whistleblowers employed by the Group who have intentionally or grossly negligently made Reports which turn out to be unfounded.

Sanctions are also foreseen against those who violate the Whistleblower's protection measures.

The disciplinary measures referred to above will be adopted in accordance with existing company procedures.

The Group may initiate any legal proceedings if the reasons for doing so exist.

## **11. Confidentiality and protection of personal data**

The information and any other personal data acquired are processed, also in the context of the Reports Management Platform, in compliance with the GDPR. In particular, the De'Longhi Group guarantees that the processing of personal data is carried out in compliance with fundamental rights and freedoms, as well as the dignity of the interested parties, with particular reference to confidentiality and data security.

The De'Longhi Group, in encouraging Whistleblowers to promptly Report possible violations, guarantees, also through the use of the Platform, the confidentiality of the identity and/or

anonymity of the Whistleblower, of the person involved or mentioned in the Report, as well as the content of the Report and the related documentation.

Reports may not be used beyond what is necessary to follow up on them.

The identity of the Whistleblower and any other information from which such identity can be deduced, directly or indirectly, cannot be revealed, without the express consent of the Whistleblower, to persons other than those competent to receive or follow up on the Reports, and in any case in compliance with the applicable legislation on the protection of personal data.

The identity of the Whistleblower is also protected in criminal, accounting and disciplinary proceedings until the deadline indicated in Legislative Decree no. 24/2023. The identity of the facilitator, the reported person (so-called person involved) and the person(s) mentioned in the Report is also protected until the conclusion of the proceedings initiated due to the Report in compliance with the same guarantees provided in favor of the Whistleblower.

Pursuant to Legislative Decree no. 24/2023, it is permitted to reveal the identity of the Whistleblower following written communication of the reasons underlying the disclosure of the data relating to their identity and with the express consent of the Whistleblower themselves.

This is allowed:

- where in the context of disciplinary proceedings initiated against the alleged perpetrator of the reported conduct, the identity of the Whistleblower is indispensable for the defense of the person to whom the disciplinary charge has been contested;
- in the event that in the management of internal and external reporting procedures the disclosure of the identity of the Whistleblower is also essential for the purposes of the defense of the person involved.

Without prejudice to the confidentiality obligations, in the internal and external reporting procedures referred to in this Procedure, the person involved may be heard, or, upon their request, is heard, also through a paper procedure through the acquisition of written observations and documents.

The De'Longhi Group informs that the personal data of Whistleblowers and other subjects possibly involved, acquired during the management of Reports, will be processed in full compliance with the provisions of the current regulations on the processing of personal data.

Personal data that is clearly not useful for processing a specific Report are not collected or, if collected accidentally, is deleted immediately.

The processing of personal data is carried out for the sole purpose of implementing the procedures established in this Policy and, therefore, for the correct management of the Reports received, as well as for the fulfillment of legal or regulatory obligations in full respect of confidentiality, fundamental rights and freedoms, as well as the dignity of the interested parties.

The personal data contained in the Reports may be communicated by the Whistleblowing Committee, by the Local Focal Point or, depending on the violation, to the corporate bodies, to the internal functions that may be competent from time to time as well as to the Judicial Authority, for the purposes of activating the procedures necessary to guarantee, as a consequence of the Report, suitable judicial and/or disciplinary protection towards the reported subject(s), where the validity of the reported circumstances emerges from the elements collected and the investigations carried out. In some cases, the data may also be communicated, during the investigation phase, to specialized external parties, as described in the previous Paragraph 6.2.

During the activities aimed at verifying the validity of the Report, all necessary measures are adopted to protect the data from accidental or illicit destruction, loss and unauthorized disclosure.

## **12. Sanctions**

In case of violation of the provisions of this Procedure, without prejudice to the other aspects of responsibility, ANAC applies the following administrative pecuniary sanctions to the person responsible:

- from 10,000 to 50,000 euros when it ascertains that retaliation has been committed or when it ascertains that the Report has been hindered or that an attempt has been made to hinder it or that the confidentiality obligation referred to in Paragraphs 7 and 11 of this Procedure has been violated;
- from 10,000 to 50,000 euros when it ascertains that no reporting channels have been established, that procedures for making and managing reports have not been adopted or that the adoption of such procedures does not comply with those referred to in Articles 5 (

relating to the internal reporting channel) and 6, as well as when it ascertains that the verification and analysis of the reports received has not been carried out;

- from 500 to 2,500 euros, when it is ascertained that the Whistleblower has made a Report with malice or gross negligence, unless the Whistleblower has already been convicted, even in first degree, for the crimes of defamation or slander or in any case for the same crimes committed with the Report to the judicial or accounting authority.

### **13. Personnel training**

The De'Longhi Group is committed to providing all employees with mandatory and up-to-date Whistleblowing training, which illustrates the procedures to be followed and the potential consequences in the event of misconduct.

### **14. Publicity of this Procedure**

This Procedure is available on the De'Longhi Group website, on the company Intranet ("GPM") and integrates the provisions of the Code of Ethics.

On the institutional website of the De'Longhi Group there is a page called "Whistleblowing" which contains the useful link for accessing and using the internal channel constituted by the Platform.

The De'Longhi Group reserves the right to modify and revise the content of this Procedure at any time, in compliance with applicable legislation.

This Procedure was approved by the Chief Executive Officer of De'Longhi S.p.A. on July 10<sup>th</sup>, 2024.