

ELECTROLUX PROFESSIONAL GROUP ETHICSPPOINT PROCEDURE

1. About this document

This document (the “**Procedure**”) outlines the purpose of the internal whistleblowing system so called EthicsPoint. The Procedure defines the rules for how EthicsPoint should be managed in terms of roles and responsibilities, the scope of the use of EthicsPoint and procedures relating to the management of reported complaints.

2. Introduction

The Electrolux Professional Group Code of Conduct (the “Code of Conduct”) provides an overview of expected conduct at Electrolux Professional Group (the “Company”) and is a guide to the Electrolux Professional way of doing business.

The Company expects all of its employees and all other representatives acting on behalf of the Company, including permanent and temporary employees, consultants, contractors, suppliers, senior management and board members of Electrolux Professional Group companies (“Other Representatives”), to adhere to the principals set forth in the Code of Conduct at all times.

EthicsPoint has been established as an additional mechanism for employees and all Other Representatives (together called “Whistleblowers”) to report certain alleged violations by the Company or its employees. EthicsPoint is not intended to replace the Company’s regular information and reporting channels.

A Code of Conduct Steering Committee (the “**CoC Steering Committee**”) led by a Chairperson (Head of Industrial Relations), has been established primarily for the purpose of overseeing and evaluating the effectiveness of EthicsPoint. The CoC Steering Committee is composed of Head of HR, Head of Legal and Head of Group Internal Audit. A designated coordinator appointed by the Head of HR (the “System Administrator”), is responsible for managing and administering the EthicsPoint on a day-to-day basis and for forwarding reports for adequate handling as needed.

3. Scope

Through EthicsPoint, Whistleblowers (as below defined) can report serious incidents on non-compliance pertaining to potential violations of laws including European law, regulations or Company policies concerning, but not limited to: Accounting and Internal Control, Conflict of interest, Corruption and bribery, Discrimination and harassment Fraud and theft, violation of policy, breaches of European law according to EU Whistleblowing Directive.

People who can make a report (“Whistleblowers”) can be, but not limited to, employees, self-employed employees, shareholders and persons belonging to the administrative, management or supervisory body of a company; any persons working under the supervision and direction of contractors, subcontractors and suppliers, third persons who are connected with the reporting persons and who could suffer retaliation in a work-related context, such as colleagues or relatives of the reporting persons.

It should be noted that in some countries a more limited scope for EthicsPoint will apply due to restrictions in local legislation.

There will be no retaliations or other negative consequences for Whistleblowers reporting incidents in good faith. Making reports through EthicsPoint is voluntary, and not reporting complaints or alleged violations will therefore not be sanctioned.

4. Procedure

4.1 Reporting through EthicsPoint

The report can be submitted accessing to the following webpage:
<http://electroluxprofessional.ethicspoint.com/>

The report should include all information necessary to verify the complaint or alleged violation.

A report may be submitted by Whistleblowers openly or anonymously. However, it should be noted that in some countries anonymous reporting is not permitted.

If the Whistleblower wants to remain anonymous please note that the complaint or alleged violation may not be fully investigated.

When a Whistleblower files a report through EthicsPoint, the following procedures will apply:

- (a) information in relation to the report, including the identity of the Whistleblower, will only be provided to those persons within the Company who have a need to know such information to execute tasks under or in relation to this Procedure, to perform the investigation and any action taken in consequence of the report;
- (b) information in relation to the report will be provided in such a manner as to safeguard as much as possible the confidentiality of the identity of the Whistleblower;
- (c) the identity of the Whistleblower will not be disclosed (in particular not to the reported person and to the direct supervisor and other line management of the Whistleblower), unless it is necessary for the investigation of the complaint or alleged violation or subsequent legal proceedings, if such is required by applicable law or an important public interest, if it is required for court proceedings or if the report has been submitted in bad faith.

Within 7 (seven) days from the receipt of the report, the Company will provide Whistleblower with acknowledgment of its receipt.

The CoC Steering Committee will then initiate an investigation of the complaint or alleged violation and may appoint an officer to lead the investigation.

Whistleblower is allowed to check the status of the report and to review any follow-up questions or to submit more information about this incident.

Within a reasonable timeframe, not exceeding three months from the acknowledgment of receipt of the report, Company will provide feedback on the case to Whistleblower.

4.2 Informing the reported person

The CoC Steering Committee or officer appointed will inform the reported person as soon as practicably possible after receipt of the report, unless there is substantial risk that notification of the reported person would jeopardize the ability of the Company to effectively investigate the complaint or alleged violation or gather the necessary evidence.

In the event the reported person cannot be informed immediately because of the risk set out above, the Company will inform him or her as soon as such risk ceases to exist and in any event no later than required by applicable law. The CoC Steering Committee or officer appointed will in any event assess the possibility to inform the reported person. This evaluation will take into account other measures that can take away the objections against informing the reported person immediately, including, but not limited to, technical and organizational measures that can be taken to prevent the destruction of evidence.

After the reported person has been informed of a report he or she will be interviewed to enable the reported person to give his view on the facts on which the report is based.

After the investigation has been concluded, the Company will determine what actions will be taken. Once such decision is made, the reported person will be informed if and what action will be taken as a consequence of the report.

4.3 Sanctions

Any misuse of EthicsPoint, including but not limited to the reporting of violations in bad faith, may result in disciplinary action or criminal proceedings against the employee/s who misused EthicsPoint.

The use of EthicsPoint in good faith, even if the facts later turn out to be inaccurate or do not trigger any particular further action, shall not expose the reporting employee to sanctions and shall further not affect his position in any way.

5. Adoption of and changes to the Procedure

This Procedure has been adopted by the CoC Steering Committee on behalf of the Company on April 28th 2020 in order to prevent, detect and correct complaints and violations of laws, regulations and company policy and have been implemented by the Company.

This Procedure has been changed on March, 14, 2022 due to enforcement of EU Whistleblowing Directive.

The Company may change this Procedure from time to time without notice. The most current version of this Procedure will always be available on the Company's intranet site.

Annex 1 – Personal data management

Annex 2 – Process flow

Annex 1

Personal Data management

Data Controller

Company is the data controller within the meaning of the applicable data protection legislation for the processing of personal data under this Procedure.

Additional Electrolux Professional Group companies may be data controllers concerning personal data relating to Whistleblowers processed within EthicsPoint. Where required under applicable law, the processing of personal data has been notified to or authorized by the competent data protection authorities.

Company will only process personal data for the purpose of reporting complaints and/or alleged violations of laws, regulations or company policies.

The processed personal data shall be limited to the identity, functions and contact details of the Whistleblowers, the reported person and all persons participating in the investigation and handling of the report, the reported facts, the information gathered during the investigation, the results of the investigation and the actions that will be taken following the investigation.

Data Processor

Navex acts on behalf of Company as a data processor within the meaning of the data protection laws. For this purpose, Company has, for itself and on behalf of the Electrolux Professional Group companies, entered into a data processing agreement with Navex.

Navex is located in the United States and the EthicsPoint database is physically located in the UK. The personal data processed by Navex may however be transferred to the United States. For this purpose, Navex and Electrolux Professional Group entered into a processing agreement which includes the Standard Contractual Clauses issued by the European Commission. These Standard Contractual Clauses provide for adequate safeguards for the protection of personal data and provide a valid legal basis for the transfers of personal data to Navex in the United States.

Security

The Company will take the necessary technical and organizational measures to adequately safeguard the personal data against loss or unauthorized access. The Company has instructed Navex to do the same. Such measures will include authentication processes and other means necessary to protect the Whistleblowers' identity, passwords and personal identifiers and logging access to data. All persons participating in the investigation and handling of the report will be bound by specific reinforced security and confidentiality obligations. The personal data may be collected by any data processing means, whether electronic or not. These means shall in all events be solely dedicated to EthicsPoint as set up under this Procedure, i.e. the personal data will in all cases be processed separately from other employee information systems or employee files.

Storage and removal

Personal data relating to reports that have been found unsubstantiated or concern an incident or a complaint outside the scope of EthicsPoint will be removed immediately. Personal data relating to reports will be removed within two (2) months after the verification work is completed, unless disciplinary action is taken or court proceedings are filed against the reported person or if the Whistleblowers filed a report in bad faith, in which events the data will be removed within two (2)

months after the disciplinary action or any court proceedings, including any appeal, have been completed. “Remove” means destruction of the personal data or adaptation of the personal data in such a way that identification of the reported person and the Whistleblowers are no longer possible.

Transparency

Without prejudice to the other information requirements under this Procedure:

- (a) where appropriate or required by law, this Procedure shall be translated in one or more of the local official languages,
- (b) this Procedure will be made available on intranet website and EthicsPoint portal or by other means which allow Whistleblowers to easily access its content, and
- (c) Whistleblowers will be informed as to:
 - (i) the existence, purposes and functioning of this Procedure,
 - (ii) the recipients of reports,
 - (iii) the rights of a person to access, correct and remove personal data relating to him or her,
 - (iv) any export of their personal data, insofar as required under applicable law,
 - (v) the right of a person to object to the processing of personal data relating to him,
 - (vi) the fact that the identity of the Whistleblowers will remain confidential, except if disclosing the identity is indispensable for the investigation of the complaint or alleged violation or subsequent legal proceedings, if such is required by applicable law or an important public interest or if the report has been submitted in bad faith,
 - (vii) the fact that abuse of EthicsPoint set up by this Procedure may be sanctioned, and
 - (viii) the fact that reporting in good faith shall not be sanctioned.

Rights of access/correction/removal

Any employees may, at all times, request to the Company whether or not a complaint or violation has been reported about him or her. If so, he or she will be provided with a written overview of the personal data available about him or her unless this would:

- (a) seriously hinder the investigation, in which case a written overview will be provided, once the evidence has been protected, or
- (b) compromise the interests of the Whistleblowers or the rights and freedoms of others, in which case the written overview will only include personal data that does not compromise such interests or rights.

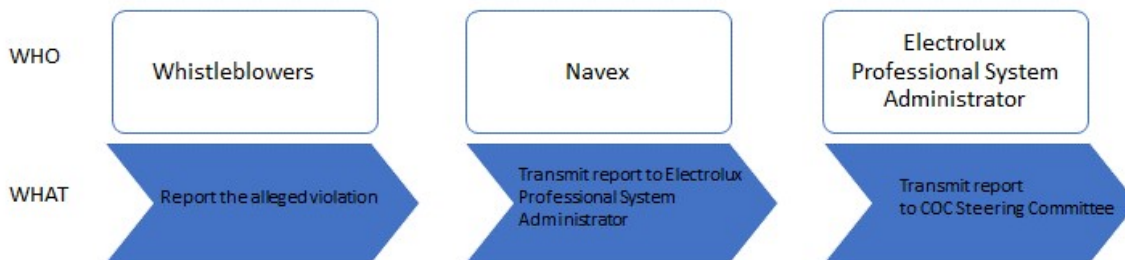
The written overview will not include details of the Whistleblower that submitted the report.

If the registered personal data provided proves to be incorrect or irrelevant, the reported person can request correction or removal of such information. The reported person also has a right to object to the processing of personal data in relation to a report on compelling legitimate grounds relating to his or her particular situation, unless the legitimacy of the processing is based on a legal obligation.

Requests mentioned under this section will be answered as soon as reasonably practicable. A request whether or not a complaint or violation has been reported about him or her will normally be answered within one (1) month (but in no event later than within four (4) months) following receipt and a request for correction or removal will be answered within ten (10) days following receipt. Any refusal will be in writing and will mention the reasons therefore.

**Annex 2
Process flow**

**ETHICSPPOINT PROCESS WORKFLOW
Report filing**



**ETHICSPPOINT PROCESS WORKFLOW
Investigation phase**

