

Whistleblowing Privacy Notice

This notice describes how and for what purposes DeLaval Holding AB and each entity directly or indirectly controlled by DeLaval Holding AB (the “DeLaval Group”), collect, use, and otherwise process personal data obtained about individuals in connection with a speak-up concern or any other ethics or compliance allegation (a “**Whistleblowing Report**”).

This notice should be read together with the privacy notice applicable to your relationship with DeLaval (for example, as an employee, customer, supplier, or candidate). The relevant privacy notice is available at delaval.com/legal or may otherwise be provided internally by the relevant DeLaval Group entity.

DeLaval uses the Tetra Laval Group Reporting Platform, which is hosted and operated by the external service provider Convercent Inc. Whistleblowing Reports and any related personal data submitted through the platform are stored within the platform. Additional information regarding the processing of personal data through the platform, including the role of Tetra Laval International SA in the whistleblowing process, is available within the platform.

In relation to a Whistleblowing Report, DeLaval International AB, Gustaf de Lavals Väg 15, 147 41 Tumba, Sweden (“**DLI**”), and the relevant DeLaval Group entity (“**DL Entity**”) may act in different data protection roles, depending on the circumstances:

- (a) as independent controllers, where DLI or a DL Entity reviews or investigates Whistleblowing Reports, particularly those submitted through its own local reporting channels (such as local HR, a manager, or legal counsel) and where the report relates solely to that entity, its personnel, its operations, or its business relationships;
- (b) as processor and controller, respectively, where DLI supports central reporting channels, such as the Tetra Laval Group Reporting Platform or the centrally managed whistleblowing email address (ethics@delaval.com), on behalf of a DL Entity. In such cases, DLI acts as a processor and may provide services such as case intake, case administration, and related operational support;
- (c) as processor and controller, respectively, where DLI assists a DL Entity in handling a Whistleblowing Report in accordance with the DL Entity's instructions. Such assistance may include collecting, reviewing, and organizing information, as well as supporting fact-finding activities;
- (d) as joint controllers, where DLI and one or more DL Entities jointly determine the purposes and essential means of handling the same Whistleblowing Report, including where the report concerns multiple entities, cross-border matters, issues requiring a coordinated investigation and response or where DL Entity does not have the competence to effectively resolve the problem.

Details of each DL Entity in the DeLaval Group are available at www.delaval.com/legal.

In connection with a Whistleblowing Report, DeLaval processes personal data of whistleblowers who do not remain anonymous, personal data included in the report, and any additional personal data collected as part of the assessment, investigation, and follow-up of the report, including, where appropriate, reporting the alleged wrongdoing to competent authorities.

The personal data collected in connection with the Whistleblowing Report will be used and disclosed only as follows:

- (a) For the purposes of receiving, assessing, investigating, and following up on a Whistleblowing Report, and subject to applicable law, personal data may be accessed only on a need-to-know basis by authorized and impartial DeLaval Group personnel designated to handle the Whistleblowing Report, including, where relevant, personnel from DeLaval Corporate Governance Council, DeLaval Compliance Officer, HR, Legal, Finance or Management.

- (b) When legally required, personal data and information you provide may also be disclosed to law enforcement or regulatory authorities.
- (c) Where employment-related measures are identified as an appropriate outcome of an investigation initiated in response to a Whistleblowing Report, personal data collected during the investigation may be used for that purpose. Such data may be disclosed to individuals who have a legitimate need to access the information to assess, implement, or manage those employment-related measures.
- (d) The legal bases for processing of personal data provided in the Whistleblowing Report will be to comply with a legal obligation of the controller, for the purpose of legitimate interest of the controller or third party, the establishment, exercise, or defense of legal claims (labor, civil, or criminal); or reasons of substantial public interest under applicable law.
- (e) Where necessary and permitted by applicable law and the relevant contractual arrangements, personal data may also be processed by service providers acting as processors and disclosed to professional advisers.
- (f) Whistleblowers or other individuals mentioned in the Whistleblowing report may be located in or outside of the country in which the Whistleblowing Report was submitted. If personal data have to be transferred outside the data subject's country of residence to a country that provides a different level of protection, the transfer is protected by appropriate safeguards, such as intra-company agreements, adequacy decisions, or other approved mechanisms.
- (g) Personal data are retained for a reasonable period after the conclusion of the case, unless the investigation leads to disciplinary or legal proceedings, in which case personal data may need to be retained until the conclusion of those proceedings and the period permitted under applicable law(s).
- (h) In accordance with applicable laws, DeLaval will notify any person who is the subject of a Whistleblowing Report of that status. Depending on the circumstances, informing the person against whom an allegation has been made at an early stage may be detrimental to the case. In that event, the provision of specific information might need to be deferred. Any deferral of information is decided on a case-by-case basis.

YOUR RIGHTS

Subject to restrictions under applicable law, data subjects have rights in relation to their personal data, which may include the right to request information about the processing of their personal data, access their personal data, and request its correction, completion, updating, restriction, or deletion. Subject to applicable data protection legislation, data subjects may also have the right to object, on legitimate grounds, to the processing of personal data relating to them.

If a data subject believes that the processing of their personal data infringes applicable law, they may also lodge a complaint with the relevant supervisory authority.

If you have any questions about this Privacy Notice or would like to exercise your data protection rights, please contact us at dataprivacy@delaval.com.