



ALERT PROCEDURE

Collection and processing





BRINGING THE GROUP TOGETHER AROUND A SHARED CULTURE AND ETHICAL STANDARDS

As part of its 2017-2022 Corporate Social Responsibility strategy, Bolloré is committed to unite its stakeholders around common ethical standards. This commitment is set out in a Code of conduct, binding upon its employees, business partners and everyone acting on behalf of the Group.

In the conduct of its business activities, the Group prohibits all forms of corruption and influence peddling, ensures compliance with competition laws and economic sanctions programs, prevent environmental damages and health and safety risks, violations of human rights and forbids discrimination and moral or sexual harassment.

Bolloré encourages its stakeholders, notably its employees and business partners, to report violations of the Code of conduct and applicable laws using this application.

The Group ensures a confidential processing of the alerts and the protection of whistleblowers acting in good faith against any form of retaliation.

Perpetrators of prohibited acts, conclusive proof of which has been established through an adversarial process, may face disciplinary sanctions and legal proceedings in accordance with applicable laws.

This procedure provides information on the purpose, conditions and guarantees of use of the whistleblowing system, the collection and processing of the alerts and the protection of personal data.

For more information: compliance@bollore.com

Cyrille Bolloré
Chairman and Chief Executive Officer

WHISTLEBLOWING Procedure for collection and processing of the alerts	Reference	v2019.EN.1.5
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HISTORY OF UPDATES	
VERSION	OBJECT
V2009.EN.1.0	Creation
V2012.EN.1.0	Update of the scope
V2014.EN.1.0	Implementation of automated processing via email address
V2019.EN.1.0	Automated collection and processing via web platform
V2019.EN.1.5	Modification of share capital

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1. PURPOSE, CONDITIONS AND GUARANTEES OF USE

1.1 The purpose of processing

This whistleblowing procedure enables any employee of the Bolloré Group or its business partners, and any individual whose interests may be affected by the Group's activities, to bring to its attention situations of which they have personal knowledge; that may constitute a felony or misdemeanour, a serious and material breach of the law or regulation, a threat to the general interest or violation of the Group's Code of Conduct.

Misconducts that may be reported include corruption and influence peddling, anti-competitive practices, failure to comply with economic sanction programmes; threats to the Environment and the health and safety of individuals, violations of human rights and fundamental freedoms; discrimination and moral or sexual harassment.

1.2 Conditions and guarantees of use

Alerts are admissible only where they fulfil the following conditions:

- **Authentication:** the use of this procedure is limited to the employees of the Bolloré Group or its business partners and individuals whose interests may be affected by the Group's activities, who must provide the information necessary to their identification. Anonymity is exceptionally accepted where the alert provides enough details to establish the seriousness of the case;
- **Good faith:** users of the system must act selflessly and in good faith; in this respect, the facts pertaining to the alert must be objectively reported and reflect their alleged nature.

In return, the user benefits from the guarantees corresponding to the status of whistleblower:

- **Confidentiality:** information that may lead to the identification of users are processed in a confidential manner and may only be disclosed with their consent, except to the judicial authority;
- **Protection:** this system is optional; no disciplinary action may be taken for not using the system or for using it in good faith.

However, individuals making improper use of the system may face disciplinary actions and legal proceedings.

2. COLLECTION AND PROCESSING OF THE ALERTS

Alleged misconducts reported via the system (2.1) are subject to an analysis of their suitability (2.2) and, where applicable, an inquiry (2.3) aimed at establishing in a timely manner the occurrence of reported misconducts and justifying disciplinary measures against the perpetrators and their accomplices (hereinafter “individuals allegedly involved”) in accordance with applicable laws.

2.1 Collection of the alerts

Behaviours allegedly contravening the laws, regulations or the Code of Conduct may be reported via the line management or, alternatively, using the alert platform accessible via the websites of the Bolloré Group and its subsidiaries or via any web browser at the following address:



Users of the platform are asked to identify themselves and fill in a form detailing in good faith – as objectively and exhaustively as possible – the alleged misconducts of which they have gained knowledge and the identity of individuals allegedly involved along with all supporting documentation.

Once the information has been collected (“submit the alert”), the system automatically generates a username and a password. This information is required to access the follow-up space where users can delete, amend their alert and track progress on its processing.

The alert is instantly sent to the representatives of the Group specially empowered to analyse the suitability of the alert and either conduct or coordinate any subsequent investigation (hereinafter “processing officers”).

2.2 Suitability Analysis

The processing officers acknowledge receipt of the alert in the timeliest manner.

These processing officers, limited in number, are specially trained to assess the suitability of an alert. They are bound by enhanced confidentiality clauses and entrusted the authority and resources necessary to the completion of their mission:

- **Compliance Department** regarding corruption, influence peddling, anti-competitive practices, and failure to comply with economic sanction programmes;
- **Human Resources Department** regarding threats to the health and safety of individuals, violations of human rights and fundamental freedoms, discrimination and moral or sexual harassment perpetrated by an employee of the Bolloré Group;
- **Corporate Social Responsibility Department** regarding threats to the Environment and the health and safety of individuals, violations of human rights and fundamental freedoms, discrimination and moral or sexual harassment perpetrated by a third party of the Bolloré Group.

Alerts that do not belong to the categories listed above (“other”) are processed by the **Compliance Department**.

To assess the suitability of the alert, the processing officers may ask for clarifications through the whistleblowing system: if the user self-disclosed his identity, he or she will receive a notification by email asking to log into their follow-up space; if the user decided to remain anonymous, he or she will be required to log in on a regular basis.

Processing officers may refer to the **Chairman of the CSR, Ethics and Compliance Committee** to rule on the suitability of an alert, particularly where it requires the adoption of measures to secure and safeguard related data (information systems, servers, software, networks, correspondence, emails) and the IT equipment (laptop, mobile phone, etc.) of the individuals allegedly involved.

At the end of the analysis process, the processing officers rule on the admissibility or inadmissibility of the alert. If inadmissible, the procedure is closed and data are immediately archived after anonymization. If admissible, the alert is subject to an investigation aimed at establishing the occurrence of reported misconducts.

2.3 Investigation

The processing officers carry out or coordinate the inquiry aimed at establishing the occurrence of reported misconducts and characterising the responsibility of the individuals allegedly involved.

This investigation may be conducted by the processing officers or by a third party (attorneys, experts, auditors) granting requisite protection of personal data.

For the duration of their mission (a priori, on-site and a posteriori), the officers or the authorised third parties are empowered to:

- **Collect** and process of any data (accounting, banking, IT, excluding data which are prohibited from collection) they deem relevant concerning the company or the individuals allegedly involved;
- **Conduct** the adversarial interviews during which the individuals allegedly involved can respond to the accusations levelled at them;
- **Question** any person to collect any useful information to verify the accuracy of the alleged misconducts.

Following the investigation, the processing officers disclose their observations and conclusions to the **Chairman of the CSR, Ethics and Compliance Committee**.

The **Chairman of the CSR, Ethics and Compliance Committee** approves the conclusions or convenes an extraordinary meeting of the committee aimed at ruling on the case.

2.4 Closure

At the end of the processing, alerts are closed for the following reasons:

- **Inadmissibility:** if the suitability analysis establishes that the alert does not meet purpose or conditions of use (particularly concerning anonymity) without establishing bad faith of its author, the alert is closed with no consequences;
- **Improper use of the procedure:** if either the suitability analysis or the subsequent investigation demonstrates the bad faith of the whistleblower, the procedure is closed and disciplinary actions and/or legal proceedings are initiated against the latter;
- **Inaccuracy or insufficiency:** if the investigation does not establish the occurrence of reported misconducts and the responsibility of the individuals allegedly involved, without establishing bad faith of its author, the alert is closed with no consequences;
- **Evidence of the misconduct:** if the investigation does establish the occurrence of reported misconducts and the responsibility of the perpetrators and accomplices, the alert is closed, and disciplinary actions and/or legal proceedings are initiated against them.

The closure of the processing is notified to both the individual submitting the alert and the individuals allegedly involved.

The use of the platform and the measures taken to prevent or remedy identified misconducts are on the agenda of ordinary and extraordinary meetings of the CSR, Ethics and Compliance Committee.

3. DATA PROTECTION AND RIGHTS OF DATA SUBJECTS

This platform is an automated processing of personal information in accordance with the applicable laws and regulations on the protection of personal data, including but not limited to the European General Data Protection Regulationⁱⁱ and the French law dated June 20, 2018ⁱⁱⁱ on the protection of personal data.

3.1 Purpose of the data collection

The personal data collected as part of the procedure will be used by the data controller to fulfil legal obligations. Data essential from a regulatory standpoint are specified as such during collection.

3.2 Data controller and recipients

The personal data listed in 3.3 (Personal data subject to or excluded from processing), collected as part of the procedure, are liable to be processed by Bolloré, a public limited company with a board of directors, with capital of EUR 470,007,292.48, registered in Quimper Register of Companies under number 055 804 124, headquartered at Odet, 29500 Ergué-Gabéric and having administrative offices at 31-32, quai de Dion-Bouton, 92811 Puteaux Cedex (+33 (0)1 46 96 44 33).

Data collected are intended to be used by Bolloré, its subsidiaries and affiliates and to be made accessible to third parties (attorneys, experts, auditors, technical service providers) solely for the needs of their assignment.

Data collected may be made accessible outside the European Union to the extent it is strictly necessary to the processing of an alert, including investigations aimed at establishing the occurrence of reported misconducts.

Bolloré ensures prior to any data transfer, notably through standard clauses on data protection, that persons accessing the data ensure a suitable level of protection.

3.3 Personal data subject to or excluded from processing

As part of the procedure, the categories of personal data listed below may be subject to processing:

- Identity (title, first name, last name), position and contact details (phone number, email address) of the whistleblower;
- Identity (title, first name, last name), position and contact details (phone number, email address) of the individuals allegedly involved.

The following categories of sensitive data cannot be processed and thus must not be mentioned as part of an alert (ground for inadmissibility), except if relevant considering the reported misconduct:

- Social insurance number;
- Offences, criminal convictions, security measures;
- Information on disciplinary proceedings;
- Assessments of the social difficulties of the persons;
- Origin;
- Political opinions;
- Religious or philosophical convictions;
- Union membership;
- Sexual life or orientation;
- Health information;
- Genetic data;
- Biometric identification data (fingerprints, written signature, etc.).

3.4 Duration of the use of personal data

The personal data collected as part of the procedure will be maintained for the following periods of time:

Inadmissible alert	Immediate
Closure due to inaccuracy or insufficiency	Two months
Closure due to improper use of the system or the materiality of the facts	Duration of the disciplinary action and/or legal proceedings

The data will be afterwards archived for a period of time not exceeding statutory periods of limitation or the applicable archiving obligations. Upon expiration of these periods all related data are destroyed.

Once archived, data are stored in a distinct and restricted-access information system.

3.5 Definition and exercise of rights relative to personal data

Whistleblowers, individuals allegedly involved, processing officers and third parties involved in the processing of alerts have the right to access and rectify errors related to their personal data and, where provided for by regulation, right to object and delete certain personal data, limit their use or request their portability with a view to transfer to a third party, and also (in France) to decide on the fate of their data after their death.

To exercise these rights, the individuals may simply e-mail ethicalert@bollore.net attaching any identification document along with the request. For any additional information or any problems regarding the use of personal data, they can be contacted the Data Protection Officer (DPO) at dpo@bollore.net. They can refer unresolved problems to the competent supervisory authority^{iv} (Commission Nationale Informatique et des Libertés in France).

3.6 Cookies Management policy

Cookies are small information files that a website or app may record on a device (computer, tablet, smartphone) and intended to ease the use of the website or app (for example, recording language preferences).

The cookies used as part of the procedure are described below:

Type of cookie	Holding period
Mandatory cookies	
<ul style="list-style-type: none"> • SERVERID: Load balancer session cookie • cookie_alertes_connect_id: Application session cookie • cookie_alertes_user_id: Application session cookie 	<ul style="list-style-type: none"> • Expiry on close of browser • Expiry after 4 hours • Expiry after 4 hours
Optional cookies	
<ul style="list-style-type: none"> • cookie_alertes_el1: Preference cookie (for admin. search) 	<ul style="list-style-type: none"> • Expiry after 365 days • Expiry after 365 days

<ul style="list-style-type: none"> • cookie_alertes_el2: Preference cookie (for admin. search) • cookie_alertes_mode: Preference cookie (for admin. search) • cookie_alertes_nav: Preference cookie (for all users nav bar opened/closed) 	<ul style="list-style-type: none"> • Expiry after 365 days
Analytics cookies	
The platform does not use this type of cookies.	
Social media tracking cookies	
The platform does not use this type of cookies.	

Most browsers are configured initially to accept cookies, but you may change your settings to refuse cookies or receive notifications when cookies are sent.

ⁱ Law no. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of the economy;

Law no. 2017-399 of 27 March 2017 on the duty of care of parent companies;

Ruling no. 2017-191 of 22 June 2017 of the French data protection commission, CNIL, amending Ruling no. 2005-305 of 8 December 2005 on the unique authorisation of the automated processing of personal data implemented as part of whistleblowing systems (AU-004).

ⁱⁱ Regulation (EU) 2016/679 of the European Parliament and the Council of Europe of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

ⁱⁱⁱ Law no. 2018-493 of 20 June 2018 on the protection of personal data.

^{iv} A list of the personal data protection authorities is accessible at the following address: <https://www.cnil.fr/fr/la-protection-des-donnees-dans-le-monde>



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