

Lagardère group Whistleblowing Procedure – Ethics Line

As part of its ethics and risk prevention strategy, the Lagardère group has set up the secure Ethics Line reporting channel.

This multilingual platform, operated by an external service provider, is accessible 24/7. It allows to report, in a confidential manner, activities or behaviors taking place as part of the Group's activities that are illegal or unethical.

This system is available to any of the Group's stakeholders - employees and third parties.

In the interest of efficiency, the Group encourages its stakeholders to first turn to the usual reporting channels, and in particular:

- for Group employees: managers, HR, staff representatives;
- for third parties: business partners, internal contact points for the Group.

The Ethics Line platform is an alternative to these usual reporting channels for stakeholders who do not wish, for reasons of their own, to turn to their usual interlocutors.

The disclosures are received by the external service provider appointed by the Group and by a limited number of qualified employees, subject to an obligation of enhanced confidentiality – the Ethics Line Officers.

The Lagardère group guarantees the platform users confidential treatment of their information and ensures to protect their interests as well as those of people whose behavior is the subject of a disclosure.

This procedure details the filing of a disclosure on the platform **(I)**, the processing of the disclosures received **(II)** and the protection offered by the reporting system to the users and to the persons targeted by a disclosure **(III)**.

It is applicable to all companies in the Group [1].

I. Filing a disclosure

• Who can file a disclosure?

The Ethics Line platform is open to all stakeholders of the Group, including:

- its employees (salaried staff, secondary and temporary staff, agents and directors, etc.);
- its service providers;
- its suppliers;
- its clients.

- **What can be reported?**

The disclosures may relate to any behavior or activity taking place within the framework of the Group's activities, perceived by the user as being unlawful or unethical, and presenting a certain level of seriousness.

The platform can collect disclosures in the following areas:

- Business secrecy – personal data breaches
- Cybercrime
- Human rights and fundamental freedoms violations
- Environment and natural resources
- Competition and unfair business practices
- Conflicts of interest
- Bribery and corruption
- Discrimination, harassment, sexism
- Health and safety of persons
- Tax, accounting and financial crimes – internal fraud, money laundering
- International economic sanctions and embargoes

Facts, information or documents, whatever their form or medium, covered by national defense secrecy, medical confidentiality or the secrecy of relations between a lawyer and his/her client, cannot be the subject of a disclosure on the Ethics Line platform.

- **How do you file a disclosure?**

Access the Ethics Line platform through this address: <http://ethicsline.lagardere.com>.

Click on “**Log a disclosure/suspicion**”.

Ethics Line

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Deloitte.

Welcome to the **Ethics Line** platform.

This secure system is part of the Lagardère group ethics and risk prevention strategy.

It is a reporting channel allowing all Group stakeholders to disclose any illicit or unethical activities of the Group's activities, which they are aware of or have been the victim of.

You can refer to Lagardère group's Whistleblowing Procedure describing in detail how to submit a disclosure, by clicking on the "Whistleblowing Procedure" tab on the left.

The Lagardère group guarantees the platform users confidential treatment of their personal interests as well as those of people whose behavior could be the subject of a disclosure.

Read the Information Notice and click on "Continue".

Choose the level of confidentiality that will be applied to the disclosure. The user of the platform who chooses to remain anonymous to the Group and / or its external service provider must be aware of the difficulties that this may pose regarding the processing of the disclosure.

Confidential

You accept that your personal information should be communicated to Lagardère and the external service provider

Partially anonymous

You prefer to remain anonymous to Lagardère and agree that your personal information should be communicated to the external service provider

Anonymous

You prefer to remain anonymous to Lagardère and the external service provider

Fill out the questionnaire

It is important at this stage to provide as much information as possible to facilitate the processing of the disclosure that will be conducted by the Group. The information should be as specific as possible and remain purely factual.

Digital documents may be attached to the questionnaire responses to support the allegations.

Create a password

This password and the "Disclosure Reference", which is communicated to the user once the disclosure is filed, allows the user to access his/her disclosure, (i) to complete it, (ii) to stay informed of the processing and (iii) to communicate securely with the Group.

The password and Disclosure Reference should be kept carefully as they cannot be returned to the user afterwards. If they are lost, the user can no longer access his/her disclosure. If the user wishes to complete his/her disclosure, he/she must submit a new one.

II. Processing of a disclosure

Upon the receipt of a disclosure, an acknowledgment of receipt is automatically sent and the external service provider conducts a first review. They then send a message to the Ethics Line Officers inviting them to connect to the platform to consult the user's case. The Ethics Line Officers:

- determine, within a reasonable time, the serious nature of the disclosure;
- inform the user *via* the platform;
- process the disclosure and decide on next steps.

The user is informed of the progress of the processing of his/her disclosure through messages that are accessible on the platform once having provided his/her access information. He/she may be contacted by the Group or its external service provider, through the platform, to provide additional information.

The Ethics Line Officers can give access to the user's case to one or more employees of the Group who are able to provide expert advice and/or react if necessary (Legal Department, Human Resources Department, etc.), as well as external advice. This access to the case is temporary and realized through the platform to ensure the same conditions of security and confidentiality as when the case is consulted by the Ethics Line Officers.

Once the disclosure has been processed, the user is informed of the closure of his/her case and, if applicable, the nature of the measures that have been taken by the Group.

Once closed, the user's file is archived and will only be accessible to a very limited number of employees from the Group Legal and Compliance Departments, for a maximum period of 10 years [2].

III. Protection of the user and the persons targeted in the disclosure

- **General**

The user of the platform is assured of being treated with respect, benevolence and discretion.

A bona fide user who complies with this procedure is not liable to disciplinary or discriminatory action, even if the reported facts prove to be inaccurate or do not need any follow-up measures. On the other hand, misuse of the platform (including the filing of a disclosure issued in bad faith, with the intention of harming or obtaining compensation) exposes the perpetrator to sanctions or prosecution.

Any employee who is the subject of a disclosure is presumed innocent until the allegations made against him or her are established. Lagardère group will confidentially inform the person (s) affected by the allegations, except when protective measures are required to prevent the destruction of evidence or for investigative purposes.

Any pressure to obstruct the filing of a disclosure constitutes an offense punishable by disciplinary and criminal penalties.

- **Confidentiality**

The identity of the whistleblower and the person(s) affected, the elements likely to identify them, the existence of an investigation and the content of the investigation remain strictly confidential, unless otherwise specified in the applicable law. Items identifying a user, or a person targeted in a disclosure, may not be disclosed, except, where appropriate, to the judicial authority or pursuant to a legal obligation.

The Ethics Line Officers carry out all the necessary diligences to preserve the security, the integrity and the strict confidentiality of the information of which they have knowledge, in accordance with the laws and regulations in force.

They are subject to an obligation of enhanced confidentiality, including with respect to their hierarchical superior.

- **Use of professional devices**

The user who accesses the platform from professional devices (computer, smartphone, Wi-Fi network, etc.) must be aware that these tools may be subject to monitoring systems, as described in his/her company's IT policy.

In this respect, and to guarantee enhanced confidentiality, the Group recommends that its employees do not use their professional devices to access the platform.

- **Protection of personal data**

The information collected from the Ethics Line platform is used for (i) the processing of disclosures received in accordance with this procedure and (ii) reporting.

This processing (collection, analysis and retention) is based on (i) the legitimate interest of the Group in detecting and preventing illegal or unethical behavior in the context of its activities and (ii) legal obligations that apply to it.

The recipients of the data are the external service provider operating the platform (Deloitte [3]) and a limited number of Lagardère group [4] employees (Ethics Line Officers and entities punctually and temporarily solicited to process a disclosure). The data may be forwarded to the Group's external advisors and service providers (lawyers, auditors, etc.) for handling the disclosure.

Data can be transferred outside the EU. Such transfers are supervised by the European Commission Standard Contractual Clauses (which you can get a copy from the Lagardère group Data Protection Officer whose address is indicated below).

Subject to the applicable legal limitations, the user has the rights of access, rectification, erasure, objection and processing restriction, as well as the ability to set guidelines on the fate of his/her data after his/her death. He/she can exercise his/her rights with the Lagardère group Data Protection Officer by following the procedure for filing a disclosure and selecting "I wish to exercise my rights over my data" in the "Disclosure Type" list [5]. In the event of litigation, he/she has the right to raise his/her claim before the *Commission Nationale de l'Informatique et des Libertés*.

Any question concerning personal data protection within the scope of Ethics Line can be addressed to the Lagardère group Data Protection Officer : delegueprotectiondonnees@lagardere.fr.

[1] The current procedure applies to the Lagardère group as a whole, subject to applicable provisions of the local law and regulations.

[2] The purpose of data retention is to enable the Group to meet its legal obligations or to comply with applicable limitation periods.

[3] Data processor under the applicable law, and particularly under the GDPR.

[4] Data controller under the applicable law, and particularly under the GDPR.

[5] In doing so, the user benefits from all the guarantees offered by Ethics Line, particularly in terms of confidentiality, which are not provided by sending a simple email.