

VERALLIA'S VALUES OBJECTIVE

Verallia has a Code of Conduct reaffirming the les principles that have been guiding all its entities and teams for a long time.

All Verallia employees and partners must respect these values; they must know and comply with the Code as well as other Group Policies, including the Group's Compliance Program.

The entities of the Group apply the laws and regulations in force in the countries where they operate. They must not deliberately take advantage of local legal loopholes or deficiencies and deviate from Verallia's values.

In particular, every form of corruption is condemned.

In this context, the Group has implemented a **dedicated Whistleblowing System** to raise alerts. This System allows you to raise alerts in a **confidential** manner.

WHAT SHOULD BE REPORTED?

The Whistleblowing System refers to all the measures implemented in order to allow Verallia Employees and Partners to report facts relating to the violations of the Code of Conduct and Anti-Trading in Influence Policy, in particular acts of corruption or influence peddling, crimes or offences, as defined in the «Whistleblowing System » Policy¹.



As an example, alerts can be related to the following subjects: corruption, anti-competitive practices, fraud, discrimination, workplace harassment.

Alerts can lead to **investigations** and may thus **have an impact on other employees and/or on third parties.**

WHO CAN RAISE AN ALERT?

All Verallia Collaborators, regardless of their position (management or member of staff), such as an employee (fixed-term contract and permanent contract), a trainee, an intern;

All Verallia Partners, such as a shareholder, an associate, a holder of voting rights, a member of administrative, management or supervisory body, an external or occasional employee, or any person with an existing direct or subcontracted business relationship with (clients, suppliers, consultants, agents, intermediaries...).

The Whistleblower must have personal knowledge of the facts reported, act in good faith and in a disinterested manner.

Collaborators and Partners can choose in which language they raise an Alert.

Whistleblowers are advised to provide the facts, information and documents to support their Alert, regardless of their format. Reports can include:

- The reason for raising the Alert
- The identity of the persons subject to the Alert
- Each document considered necessary to support the Alert.

HOW TO RAISE AN ALERT?

Three channels for raising alerts are available.

- **The hierarchical channel:** The Alert can be reported (i) to the direct or indirect line manager, (ii) to the employing Verallia entity, or (iii) to the compliance correspondent appointed by it or (iv) by sending a letter to compliance@verallia.com or to : Verallia SA - Tour Carpe Diem – 31, Place des Corolles – 92400 Courbevoie (France) for the attention of the Group Compliance Officer.
- **The Platform:** The Alert can also be made by using the web tool (Whistleblowing Platform Convercent) available at the following link: <https://ethics.verallia.com/>
- **The Phone Line:** The Alert can also be made by phoning free of charge to a call centre whose contact details are available on the Platform's homepage.

VERALLIA'S 4 VALUES ARE:

- Care for Customers
- Respect people, laws and the environment
- Empowerment and accountability
- Teamwork

¹ This document is provided for illustrative purposes only. Please read the Whistleblowing System Policy available on the Intranet and on the Verallia.com web site – Compliance or from the Human Resources department.

Each Collaborators and Partners must feel free to discuss about the ways to raise an Alert as well as its content.

Any question related to the interpretation of the scope of the Whistleblowing System can be **discussed with the Head of Human Resources and/or the Compliance Officer of the Entity.**

CONFIDENTIALITY AND ANONYMITY

The identity of the Whistleblower and of the persons targeted by the Alert remains **confidential** throughout its treatment, in accordance with applicable laws and regulations.

Verallia encourages the Whistleblowers to disclose their identity. In any case, the identity will be treated in a strictly confidential manner.

By way of exception, if the seriousness of the facts is established and the facts are sufficiently detailed, Alerts can be made anonymously. However, anonymous reports are not encouraged and do not allow an efficient processing of the Alert.

PROTECTION AGAINST RETALIATION

Verallia is **committed to a non-retaliation policy**; as such, no retaliatory measures will be taken against a Whistleblower who raised an Alert in good faith. Verallia does not tolerate any form of retaliation against the Whistleblower, such as harassment. **Disciplinary measures or sanctions can be taken against the author(s) of retaliatory actions.**

MANAGEMENT OF ALERTS

Regardless of the channel used to raise an Alert (Platform, Phone Line or hierarchical channel), all Alerts are recorded on the Platform (tool Convercent).

Each Alert is subject to a preliminary analysis and treated in a confidential manner, to determine whether the Alert falls within the scope presented below (see section « What should be reported? »). If the Alert does not fall within the scope of this section, the Whistleblower will be notified and guided towards the appropriate channel.

PROTECTION OF PERSONAL DATA

Verallia is committed to only process data that are adequate, relevant and not excessive in relation to the purposes for which they have been collected.

Personal data are stored in accordance with applicable local regulations as well as Verallia's rules and procedures for the protection and retention of personal data.

Any person identified during the treatment of an Alert, whether the Whistleblower or a person subject to an Alert, has the right to access and rectify data concerning him/her, as well as the right to object on legitimate grounds to the processing of his/her data. However, if provisional measures are necessary to prevent the destruction of evidence related to the Alert, the person subject to the Alert is only informed after these measures have been taken.

It should however be noted that the person subject to an Alert can under no circumstances obtain information regarding the identity of the Whistleblower, based on the right to access personal data.

HOW TO USE THE WHISTLEBLOWING PLATFORM OR THE PHONE LINE?

The Alert can also be made by **all Verallia Collaborators and Partners using the Whistleblowing Platform** available at the following link:

<https://ethics.verallia.com/>

The contact details of the Freephone Line for each country can be found on the homepage of the Platform.

The Alert will be triggered once the content of the Alert has been validated.

