

VERALLIA VALUES

Verallia has a Code of Ethics that reaffirms the principles that have long guided all of its companies and teams.

All Verallia employees and partners must respect these values; they must know and comply with the Code and other Group policies, particularly the compliance program.

VERALLIA'S 4 VALUES ARE:

 #CUSTOMER CARE

 #RESPECT OF PEOPLE, LAWS AND THE ENVIRONMENT

 #EMPOWERMENT AND ACCOUNTABILITY

 #TEAMWORK

OBJECTIVE



Group companies apply the laws and regulations in force in the countries in which they operate and refrain from deliberately taking advantage of local legal loopholes or deficiencies to deviate from Verallia's values.

In particular, **all forms of corruption are rejected.**

In this context, the Group has set up a **dedicated Whistleblowing system.** This system allows you to report your Alerts **confidentially.** Use of the Device is **optional.** Failure to use the Device will not entail any consequences.

WHAT ALERTS SHOULD BE REPORTED?



The Whistleblowing System is the set of measures enabling any Verallia Employee and Partner

to report, under the conditions defined in the «**Whistleblowing System**» Policy¹, facts concerning violations of Verallia's Code of Ethics and Anti-Corruption and Anti-Influence Trading Policy, and in general, any information regarding a crime or misdemeanor, a threat or harm to the general interest, a violation or attempted violation of an international regulation to which Verallia is subject.

By way of illustration, Alerts may concern the following issues: **corruption, anti-competitive practices, fraud, discrimination and harassment in the workplace.** Alerts give rise to **investigations and may have an impact on other employees and/or third parties.**

WHO CAN ISSUE AN ALERT?



Any **Verallia employee**, i.e. any member of staff of a Verallia entity, in post or whose employment relationship has ended, such as an employee (fixed-term or permanent), apprentice, trainee or candidate;

Any **Verallia Partner**, i.e. any shareholder, associate, holder of voting rights, member of an administrative, management or supervisory body, external or occasional employee and any person having an existing direct or subcontracted business relationship with Verallia (customers, suppliers, consultants, agents, intermediaries, etc.).

The Whistleblower must (i) have obtained the information directly or indirectly in the course of his/her professional activities or, where this is not the case, have had personal knowledge of it, (ii) act without direct financial consideration and (iii) act in good faith.

Employees and Partners may use the language of their choice to report an Alert.

Whistleblowers are asked to provide facts, information and documents **directly related to the subject of the alert**, such as:

- the reason for raising the alert,
- the identity of the persons subject to the Alert,
- any element, whatever its form or medium, likely to support the alert.

The wording used must be **objective** and show the **presumed nature of the facts.**

HOW TO RAISE AN ALERT?



Three Alert reporting channels are available.

- **Hierarchical channel:** the Alert may be reported to (i) the direct or indirect line manager, (ii) the employer, (iii) the correspondent appointed by the employer or (iv) sent by post 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.
- **Platform:** the Alert can be reported using the web tool provided (Convercent) at the following address: <https://ethics.verallia.com/>
- **Phone Line:** the Alert can be raised by phoning a call centre free of charge, the contact details of which are available on the Platform's home page.

If an Alert is escalated through the **Hierarchical Channel**, the recipient of the Alert must **immediately enter the alert on the Platform.**

When an alert is received orally:

- additional information may be requested to verify that the alert falls within the scope of the System.
- The Whistleblower may request that a videoconference or a face-to-face meeting be organised.
- With the agreement of the Whistleblower, the alert is transcribed on the Platform and the Whistleblower may check, correct and approve the transcript.

Each Employee and Partner must feel free to discuss the procedures

for reporting their Alert, as well as its content.

Any question relating to the interpretation of the scope of the System may be **discussed with the Human Resources Manager and/or the Compliance Correspondent of their employing or co-contracting Entity.**

Subject to compliance with locally applicable mandatory rules, Whistleblowers also have the following reporting options:

- The Whistleblower may make an **external report** to an Authority, either directly or after having made an Alert to Verallia².
- The Whistleblower may make a **disclosure** in the public sphere only when certain conditions are met².

ALERT MANAGEMENT



The Alert will be triggered once its content has been validated.

Regardless of the means used to raise an Alert (Platform, Phone Line or hierarchical channel), **all reports are recorded in the Platform (Convercent tool).**

Each Alert gives rise to a preliminary analysis, which is treated confidentially, in order to determine whether the Alert falls within the scope of the System. If applicable, the Whistleblower will be informed and directed to the appropriate channel.

CONFIDENTIALITY AND ANONYMITY



The processing of Alerts respects the **integrity and confidentiality** of the information collected, in particular the identity of the Whistleblower, as well as that of the persons targeted by the Alert

and/or mentioned in accordance with applicable law.

Verallia encourages Whistleblowers to reveal their identity. The latter will, in any event, be treated confidentially. As an exception, when the seriousness of the facts is established and the facts are sufficiently detailed, the report may be made anonymously. However, anonymous reporting is not encouraged and does not enable the Alert to be handled efficiently. Nor does anonymity allow the Whistleblower to receive feedback on his Alert.

PROTECTION AGAINST RETALIATION



Verallia is committed to a policy of **non-retaliation**; as such, no retaliatory action will be taken against a Whistleblower who raises an Alert in good faith. Verallia does not tolerate any form of retaliation against the Whistleblower, such as harassment.

Disciplinary proceedings or sanctions may be taken against the perpetrator of the retaliation.

PROTECTION OF PERSONAL DATA



Verallia undertakes to process only data that are **adequate, relevant and not excessive** in relation to the purposes for which it was collected.

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

Any person identified in the context of this System, whether the Whistleblower or the person who has been the subject of an Alert, has the right to access the data

concerning him or her. Any person identified may also request, under the conditions and within the limits provided for by the applicable regulations, the rectification or deletion of his/her data or oppose the processing (provided that this right is applicable) or request the limitation of the processing.

The rights of rectification and deletion cannot allow the retroactive modification of the elements contained in an alert or collected during its investigation. These rights may only be exercised to rectify factual data whose material accuracy can be verified by Verallia on the basis of conclusive evidence and without erasing or replacing data, even erroneous data, collected initially.

These rights may be exercised at the following address:

donnees.personnelles@verallia.com

The person who is the subject of an Alert may under no circumstances obtain information concerning the identity of the Whistleblower.

If the person concerned, after contacting Verallia, considers that his/her rights have not been respected, he/she may submit a complaint to the competent supervisory authority (the CNIL in France).

ACCESSING THE PLATFORM OR THE PHONE LINE



The Platform is **accessible to all Verallia Employees and Partners** at the following address:

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

The contact details for the Phone Line can be found on the home page of the Platform.

(2) See the «Whistleblowing System» Policy for more information

