

Protection of personal data within the scope of the Whistleblowing system of Verallia Group

Prior information for users of the Convercent Platform

Terms beginning with a capital letter are defined in the Verallia Whistleblowing system Policy - or in the Whistleblowing system User Guide.

In accordance with our values of **respect for people, laws and the environment**, and as part of the implementation of initiatives supporting our Code of Conduct and Anti-Corruption and Anti-Trading in Influence Policy, Verallia has put in place a Whistleblowing System, complying with Article 8, paragraph III and Article 17 of the law No. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of the Economy (“Loi Sapin 2”) and with the decree No. 2017-564 of April 19, 2017 on the procedures to receive Alerts from Whistleblowers within legal entities governed by public or private law or government administrations.

The Whistleblowing System enables every Verallia Collaborators and Partners to report in a disinterested manner and in good faith actions of which they have personal knowledge that potentially contradict the legal obligations or the Code of Conduct, or the Group's Anti-Corruption and Anti-Trading in Influence Policy of the Group, under the conditions defined by the Whistleblowing Policy.

Within this scope and in order to comply with its legal obligations, Verallia S.A. collects and processes, as Controller, the information needed to analyze and act on Alerts concerning:

- Violations of Verallia Code of Conduct and Anti-Corruption and Anti- Trading in Influence Policy involving incidences of corruption or influence trafficking;
- Crimes or offences;
- Clear and manifest violations of international commitment duly ratified or approved by The French government;
- Serious and manifest violations of unilateral act of an international organization based on such a commitment;
- Serious and manifest violations of laws or regulations;
- Or serious threats or harm to the public interest, that the Whistleblower has personal knowledge.

In general, and subject to locally applicable regulations, the Alert may be made anonymously or not.

However, provided that it is not prohibited under locally applicable regulations, Verallia encourages the Whistleblower to disclose his/her identity. In any case, the identity will be protected and 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.

Whistleblowers are advised to provide the facts, information and documents to support their Alert (reason for raising the Alert, identity of individuals concerned, any document deemed necessary to

substantiate the Alert). **Verallia draws the attention of whistleblowers to the fact that reports must remain factual and have a direct link with the subject of the report.**

The inappropriate use of the Whistleblowing System can lead to disciplinary sanctions or judicial proceedings against their author. However, using the Whistleblowing System in good faith, even if the reported information turns out to be inaccurate or does not lead to further proceedings, will not expose the author to a disciplinary sanction.

Verallia is committed to only process data which is adequate, relevant and not excessive in relation to the objectives for which it is being collected. Only the following categories of data can be processed:

- Identity, functions and contact information of the Whistleblower;
- Identity, functions and contact information of the persons subject to an Alert;
- Identity, functions and contact information of the persons involved in the reception or treatment of the Alert;
- The facts that are being reported;
- Elements of information collected during the verification of the reported fact;
- Summary report of the verification processes;
- Follow-up actions related to the Alert.

Alerts are processed by:

- The internal departments of Verallia which need to know them, namely:
 - the Triage Committee, composed by the Group General Manager, the Group Legal Director and the Group Human Resources Director;
 - the Investigative Committee, comprising the Head of Investigations and the investigation team, if appointed.
 - the Group Compliance Committee (to the extent strictly necessary and proportionate with regard to the justification for supplying the information).
- The group entity to which the facts relate and/or to any internal and/or external experts (human resources department, lawyers, chartered accountant, analysts, etc.) that Verallia may call on to process the Alert.
- In case of disciplinary proceedings, the Human Resources Department of the Company which is the employer of the employee subject to these proceedings has to be involved.
- The service provider(s) responsible for supplying and operating the Platform and the Phone Line.

Where applicable, data may be sent to the judicial authority, being specified that:

- Any elements that may identify the Whistleblower can only be disclosed to the judicial authorities with the consent of the Whistleblower;
- Any elements that may identify the person implicated by an Alert can only be disclosed if the Alert is followed by a legal action.

Personal data are hosted within the Platform in Europe. However, they can be transferred (i) by Verallia to other entities of the Verallia Group or third parties registered in countries within or outside of the European Economic Area (EEA) for the purposes of processing of the Alert or (ii) by the service provider responsible for the Platform and Phone Line for the purposes of support and maintenance. This includes countries which do not have the same level of protection of personal data as in the EEA. Verallia ensures that such transfers by Verallia are carried out in compliance with applicable local data protection regulation and will be secured through adequate data privacy safeguards such as the conclusion of standard contractual clauses adopted by the EU Commission.

Verallia S.A. takes all the necessary precautions to preserve the security of the data both during their collection and their communication or storage.

Within the Whistleblowing System, personal data is kept in compliance with applicable local legislation as well as Verallia rules and procedures regarding data protection and retention. In this regard, personal information is retained in the following ways:

- When an Alert does not fall within the scope of the Whistleblowing System the related data will be without delay deleted or anonymized and archived;
- When no action is taken following an Alert, the related data will be deleted or anonymized and archived, after the enquiries are completed according to applicable laws and;
- When the Alert is followed by disciplinary or judicial proceedings, data is kept until the end of the proceedings or until the lodging of any appeals against the decision;

The data may be stored for a longer period, in temporary storage, if Verallia has a legal obligation to do so (for example, to meet accounting, social security or tax obligations).

Any person whose data are processed within the scope of the Whistleblowing system, has the right to access his/her personal data. Any identified person may also request the rectification or erasure of their data under the conditions and limits provided for by the applicable regulations. They may also object to the processing or request its limitation. These rights may be exercised by writing to the following address: donnees.personnelles@verallia.com.

For more information regarding the Whistleblowing System, please see the Verallia Whistleblowing System Policy or the Whistleblowing system User Guide.

If, after contacting Verallia, the data subject considers that their rights are not respected or that the processing does not comply with the data protection rules, they may lodge a complaint to the competent supervisory authority (the French Data Protection Authority (CNIL) for France).