

# JCDecaux Group's Ethic Alert Procedure

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- AS AN EMPLOYEE OF THE JCDECAUX GROUP

- AS AN EXTERNAL/CASUAL COLLABORATOR

## Preliminary information

- ▶ **Every employee** of the JCDecaux Group, as well as **every external or occasional contractor of the Group**, is entitled to action this alert procedure, in accordance with the criteria and conditions set forth the law n°2016-1691 of 09/12/2016 named « Sapin II » (regarding the transparency, the fight against corruption and the modernisation of economic life).
- ▶ This alert procedure also relates to any situation of **infringement of the Fundamental Ethical Rule** set forth by the Code of Ethics of the JCDecaux Group regarding facts of corruption or influence peddling.
- ▶ Such procedure allows to seize, depending on the nature of the subject and on the geographical provenance of the whistle-blower, firstly the immediate supervisor then, secondly, the **Group's Ethic Committee**.
- ▶ For the avoidance of doubt, this alert procedure is **not mandatory**: employees who would choose not to use it would not be exposed to any sanction.

1.

## ARE YOU CONCERNED BY THE ALERT PROCEDURE?

you are an  
**employee** of a company  
of the Group JCDecaux  
**in France or in the world**

### You can use this alert procedure if:

You face, in France or in any other country where the group JCDecaux has a presence, a **situation contrary to the Fundamental Ethical Rules** (corruption/influence peddling), free competition, financial infringements) set forth by **the Code of Ethics (1)** of the Group JCDecaux.

You face, in France, a **situation (2)**:

- > of crime or offence;
- > of clear and significant violation of an international commitment duly approved or agreed by France, of an unilateral act of an international organisation taken on the basis of such commitment, of the law or regulation; or
- > of threat or significant prejudice to the general interest.

linked to the Group JCDecaux's activity.

you are an  
**external or occasional contractor (3)**  
of a company of the Group  
JCDecaux **in France**

### You can use this alert procedure if:

You are faced with, in France, a **situation (2)**:

- > of crime or offence;
- > of clear and significant violation of an international commitment duly approved or agreed by France, of an unilateral act of an international organisation taken on the basis of such commitment, of the law or regulation; or
- > of threat or significant prejudice to the general interest.

linked to the Group JCDecaux's activity.

(3) *external or occasional contractor*: intermediaries, interns, consultants, services providers and employees of subcontracting companies

(1) available on the intranet and extranet of the site of JCDecaux

(2) law « Sapin II » n° 2016-1691 of the 09/12/2016

### **Important!**

The facts, information or documents covered by national defence secret, medical secrecy and attorney-client privilege cannot be subject of a reporting in the framework of the present alert procedure.

2.

## WHOM CAN I SEND MY ALERT TO?

you are an **employee** of a company of the Group JCDecaux in France or in the world

→ Report to your **immediate supervisor**, who is in charge of guiding and advising you, and transmit your request, if necessary, to the Secretariat of the Group's Ethics Committee.

by filing the form hereafter

→ If your immediate supervisor is the author or is linked to the situation you wish to report, you may alert the **Secretariat of the Group's Ethics Committee**

you are an **external or occasional contractor** (3) of a company of the Group JCDecaux in France

→ Report to the **Secretariat of the Group's Ethics Committee**

by filing the form hereafter

### Note

If you don't have the possibility to complete and send electronically and confidentially the form hereafter, you can leave your report on the voicemail provided by the Secretariat of the Group's Ethics Committee (33(0)1 30 79 79 11).

### Important!

Without answer from the recipient of your report, it shall be sent to the judicial authority, the administrative authority or the professional associations. As last resort, if none of this organism has processed this report in a period of three months, the report shall be made public.

## 3.

## THE CONTENT OF YOUR ALERT

### specific and impartial facts

- ▶ The information submitted in the framework of this alert procedure must be **submitted selflessly and in good faith**, be articulated **impartially** and be **sufficiently specific** in order to be able to verify the alleged facts.
- ▶ Only the data necessary to the review of the appropriateness of the alert must be submitted and the forms used to describe the nature of the facts reported must show their presumed nature.

### facts personally observed

The facts must have been **personally observed** by the author of the report and are limited to the area listed in the form hereunder (see point 5).

### Your identity

- ▶ **You are encouraged to identify yourself** while using the alert procedure.
- ▶ **As an exception**, an anonymous report may be processed if the facts mentioned are sufficiently serious and that the report is supported by detailed factual elements.

### The elements allowing a dialogue

You must as well provide elements allowing if need be, a **dialogue with the recipient of the report**.

### **Caution!: this alert is binding**

Any person abusively using this procedure or reporting facts in bad faith, with intention to harm or knowing their untruthful nature, may be subject to **disciplinary sanctions** according to the Internal Rules applicable within the JCDecaux entity concerned, as well as to **legal proceedings**.

## 4.

THE PROCESSING  
OF YOUR ALERTrecevability  
and processing  
of the report

- ▶ You will be immediately informed of the **receipt** of your report and with the **reasonable and foreseeable delay** necessary to its review, by means of a written and dated acknowledgement of receipt. The acknowledgement of receipt does not equal receivability of the report.
- ▶ If, as employee for the group JCDecaux, you have **seized your immediate supervisor**, your report shall be processed by the later, who shall give it the appropriate continuation (processing, closing incident without further action or transfer to the Secretariat of the Group's Ethics Committee, which may send it back to the Operational Management or to the Legal Department in charge, for the needs of verification only and the processing of the alert).
- ▶ **If you have directly seized the Secretariat of the Group's Ethics Committee**, the later will directly process your report within the framework of its responsibilities. It may send it back to your immediate supervisor and/or to the Operational Management and/or to the Legal Department concerned for the needs of verification only and the processing of the alert.
- ▶ **The reasonable and foreseeable delay necessary to review** the recevability of a report and the modalities on the possible continuation will be announced to you in a reasonable from the receipt of such report.

If no continuation is decided, you will be informed of the closing of your file. In this case, the elements of the file of report will be destroyed or filed after having been anonymised in the applicable delays according to the local regulation.

Protection of the  
confidentiality  
of the report

- ▶ In accordance to the applicable regulation this alert procedure ensure a **strict confidentiality of your identity** as whistle-blower, **of the identity of the persons affected** by your report of the facts subject of the report and, generally, of any **information** provided.
- ▶ **Any person having access to information** within the framework of this alert procedure, its processing and the investigations that may occur, is bound by a **strict obligation of confidentiality**.
- ▶ Apart from the judicial authority, the elements likely to identify you as the whistle-blower cannot be disclosed without **your consent**. Equally, the elements likely to identify the person(s) targeted by your report cannot be disclosed before the appropriateness of the alert is set out.
- ▶ The persons disclosing confidential information may face **legal proceedings** and/or **disciplinary sanctions**.

## obstacle to a report

Any person acting as obstacle, in any way, to the transmission of a report may face **legal proceedings** and/or **disciplinary sanctions**.

## no retaliatory measures following a report

- ▶ The Group will not impose nor tolerate **any sanction, any threat, sanction, change of status, harassment, or retaliation of any kind**, towards a whistleblower of good faith in the framework of this procedure, even if the facts turn out to be inaccurate or do not go further.
- ▶ Similarly, a person **cannot be rejected from a recruitment process, from accessing an internship or a professional training period**, because of the initiation of an alert in the framework of this procedure.

## Data processing

- ▶ The alert procedure is implemented by JCDecaux SA in its quality of **responsible of the processing**.
- ▶ This alert procedure implies the personal data processing which purpose is the report and the processing of the alerts issued within the framework of the present procedure and which has been authorised **by the French authority in charge of the personal data protection**, the C.N.I.L. (*Commission Nationale de l'Informatique et des Libertés* - National Commission on Informatics and Liberties). This processing is based on the respect of the legal obligations imposed to JCDecaux SA pursuant to the law n° 2016-1691 of the 09/12/2016 regarding the transparency, the fight against corruption and the modernisation of economic life (law called « Sapin II »).
- ▶ Only the following categories of data shall be processed within the framework of the alert procedure:
  - identity, professional duties and contact details of the author of the report;
  - identity, professional duties and contact details of the persons targeted by the report;
  - identity, professional duties and contact details of the persons participating in the collect or the processing of the report;
  - facts reported;
  - elements collected within the framework of the verification of the reported facts;
  - debriefing of the operations of verification ;
  - continuation decided for the report.

## conservation period

- ▶ Any data relating to a report that will be considered as **out of the scope of the ethic alert procedure** described below will be destroyed or filed immediately after having been anonymised.
- ▶ When the report isn't **followed by a disciplinary or judicial procedure**, the data relating to such report are destroyed or filed, having been anonymised, in a period of two months from the closing of the verification operations.
- ▶ When a **disciplinary or judicial procedures** is engaged against the person affected or the author of an abusive report, the data relating to the report are kept until the end of the judicial procedure.
- ▶ The archives are kept according to the **applicable regulation**, for a period not exceeding the duration of the contentious procedures.

## Data Transfers

- ▶ In the framework of the processing of the reports, some personal data relating to the authors of the reports or to the persons targeted by these alerts can be **transferred outside the European Economic Area**.
- ▶ JCDecaux SA undertakes to ensure a **relevant level of protection for the data transferred** within this framework, in particular by generalising Standard Contractual Clauses approved by the European Commission (to which it is possible to access by sending an e-mail to: [dpo\\_f@jcdecaux.com](mailto:dpo_f@jcdecaux.com)) or agreeing to the Privacy Shield (human resources data included) for the recipients of data located in the United-States.



## Right of persons

▶ In accordance with the regulation applicable to the personal data protection in most of the countries in which the Group has a presence and, in particular inside the European Union, any person identified in the framework of an alert procedure, whether this person is at the origin or the target of the report, may **contact the Secretariat of the Group's Ethic Committee** in order to exert the following rights:

- the right to be informed: you have the right to be informed concisely, transparently, clearly and in a manner easily accessible about how your personal data are processed;
- the right of access: you have the right to obtain (i) the confirmation that these personal data about you are/are not processed and, when they are, to obtain (ii) access to such data and a copy of the later ones.
- the right to modify: you have the right to obtain the modification of the personal data about you which are inaccurate; you have the right as well to obtain that the incomplete personal data are completed, also by providing an additional declaration;
- the right to delete: in certain cases, you have the right to obtain the deletion of your personal data; however this is not an absolute right and JCDecaux may have legal or legitimate reasons to keep such data;
- the right of limitation of the processing: in certain cases, you have the right to obtain the limitation of the processing of your personal data;
- the right to introduce a claim with a control authority: you have the right to the C.N.I.L. in order to introduce a claim about the practices relating to the personal data protection operated by JCDecaux ;
- the right to give directives concerning the use of data post-death: you have the right to give directives to JCDecaux concerning the use of personal data after your-death.

You can send your request together with the copy of an identity document to the following e-mail address hereafter:

- [comite.ethique@jcdecaux.com](mailto:comite.ethique@jcdecaux.com), or
- you can leave a message on the dedicated voicemail of the Secretariat of the Secretariat of the Group's Ethics Committee (33(0)1 30 79 79 11).

▶ The person targeted by an alert is informed by the Secretariat of the Group's Ethics Committee from the date of registration of data concerning this person, in order to **allow this person to react to the processing of such data**. When provisional measures are necessary, in particular to prevent the destruction of proofs relating to an alert, the information of this person occurs after the implementation of such measures.

▶ This person may as well request, under the same conditions as above, to exert his/her rights.

▶ JCDecaux SA has as well designated a Data Protection Representative reachable

# 5. TRIGGER YOUR ALERT AS EMPLOYEE OF THE GROUP JCDECAUX REPORTING FORM

▼ To trigger the alert, please file in the form below ▼  
[file at least the mandatory fields marked with a (\*)]

**NAME/First name (\*)**  
.....

**Company (subsidiary of the Group JCDecaux) (\*)**  
.....

**E-mail address (\*)** .....

I am an employee of JCDecaux  
NAME/First name of the immediate supervisor (\*)  
.....  
Service / Operational Management  
.....

**Alert anticorruption/ethic**  
(select the area(s) below)

- corruption/influence peddling
- free competition
- financial infringement
- crime or offence
- clear and significant violation of an international commitment duly approved or agreed by France, of an unilateral act of an international organisation taken on the basis of such commitment, of the law or regulation
- threat or significant prejudice to the general interest

**Facts reported (\*)**  
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▶ submit ◀  
to your immediate supervisor

or ▶ submit ◀  
to the Secretariat of the Group's Ethic Committee

**5. TRIGGER YOUR ALERT AS EXTERNAL / OCCASIONAL CONTRACTOR OF THE GROUP JCDECAUX**

## REPORTING FORM

▼ To trigger the alert, please file in the form below ▼  
[file at least the mandatory fields marked with a (\*)]

**NAME/First name (\*)**

I am an external / occasional contractor of the group JCDecaux

**Company / country (\*)**  
 .....

**E-mail address (\*)** .....

**Alert anticorruption/ethic**  
 (select the area(s) below)

- crime or offence
- clear and significant violation of an international commitment duly approved or agreed by France, of an unilateral act of an international organisation taken on the basis of such commitment, of the law or regulation
- threat or significant prejudice to the general interest

**Facts reported (\*)**

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▶ submit ◀  
 to the Secretariat of the Group's Ethic Committee