



Whistleblowing Guidelines



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1 Why use a whistleblowing hotline?

1.1 Objectives

The Group has decided to implement a whistleblowing hotline available to all the Group's employees as well as occasional external employees, as defined hereafter.

Specified in Group's Code of Ethics, this whistleblowing hotline is an additional channel of expression given to employees.

The whistleblowing hotline thus enables employees to report anomalies or wrongdoings related to the topics listed in the scope below.

Implementing the whistleblowing hotline implies that each employee shows responsibility as the hotline can only be effective if the data are communicated in good faith and in a disinterested manner.

The employees' use of the whistleblowing hotline is optional, it does not aim to replace the other existing reporting channels, notably:

- Management,
 - Human Resources,
 - Employee representatives,
- who remain the preferred contacts.

Therefore, employees cannot be blamed for not using the whistleblowing hotline.

The hotline can be used notably when reporting a case to direct management seems difficult or when the anomaly reported is likely not to be appropriately investigated.

Group's Human Resources Department is in charge of the whistleblowing hotline and its monitoring.

1.2 Who can use the reporting hotline?

All employees of the Group can use the reporting hotline.

The hotline is also available to occasional external employees of the Group (temporary employees, trainees, and service providers).

1.3 Whistleblowing Scope

The reporting hotline enables employees of the Group, when they have personal knowledge of it, to raise genuine concerns or report:

- Potential or actual breaches of:
 - Group's Code of Ethics,
 - Group's anti-bribery and corruption policy,
 - Any domestic and international regulation in force, including any crime or offence,
- Any threat or serious harm to the public interest.

For example, the facts which may be reported can deal with:

- Anti-Competitive Practices.
- Environmental Protection.
- Fight Against Discrimination and Harassment at Work.
- Financial, Accounting, Banking & Anti-Corruption.
- Health, Hygiene and Safety at Work.

Reports cannot deal with classified elements related to national defence, doctor-patient confidentiality, or secrecy of the relationship between a lawyer and his/her client.

The whistleblowing hotline complies with the Law and the rules applicable in the countries where the Group operates.

2 How to use the whistleblowing hotline?

2.1 How to report a case?

The Group has chosen to resort to an independent external service provider, the company NAVEX, in order for the employee reports to be collected in a fair manner.

NAVEX ensures that the data collected are adequate, accurate, and not excessive in accordance with the reasons why they are collected.

The whistleblower has two options to report a case.

By phone

- In France, calling at 0-800-99-0011. At the English prompt, dial 833-558-1933.
- In Poland, calling at 0-0-800-111-1111. At the English prompt, dial 833-558-1933.
- Service available 24h, 7 days a week.

As NAVEX is an international company, the telephone call may take place between three persons, i.e. the employee, NAVEX's English-speaking call handler and an interpreter, the last two having signed a confidentiality agreement.

Questions are issued to the employee in English by NAVEX's call handler and then translated by the interpreter.

Once the conversation is over, NAVEX provides the employee with a file number and a password so that the employee can contact NAVEX and be contacted by NAVEX to bring additional information on the reported case or be informed of his/her report processing.

On the web

Via the following web site: <https://secure.ethicspoint.eu/domain/media/fr/gui/106732/index.html>

To report a case, the employee answers a questionnaire online and the report is sent to NAVEX.

Once the questionnaire has been filled in, NAVEX provides the employee with a file number which enables the employee to connect again to the web site in case he/she wishes to bring additional information or be informed of his/her report processing.

Whatever the means used, once the case has been reported, NAVEX informs the Group.

2.2 How is a case dealt with?

Scenario #1: the reported case is included in the scope of the whistleblowing hotline

The reported case is dealt with by one of the three entitled managers hereafter designated, each one being subject to reinforced confidentiality obligations:

- The Head of Group Human Resources Department,
- The Head of Group Legal Department,
- The Head of Group Audit and Internal Control Department.

The case is dealt with in a secured manner. The data provided can be accessed only by an individual login and password.

The identity of the whistleblower is preserved and kept confidential.

If necessary, the case can be investigated within the framework of an ethics committee. This committee will include a limited number of persons skilled to deal with the subject.

Scenario #2: the reported case is not included in the scope of the whistleblowing hotline

First, each reported case is reviewed in a confidential manner by the external service provider NAVEX in order to ascertain whether it is included in the scope of the hotline.

Any case which does not deal with any domain of the hotline scope, which is reported in bad faith, which constitutes a slanderous or false denunciation, or which relies on unverifiable facts will be destroyed immediately and the three entitled managers as well as the whistleblower will be informed.

2.3 Whistleblower's Identification

The employee who wishes to report a case is free to identify himself/herself or keep anonymous to the external service provider NAVEX. In the first case, his/her identity will however be kept confidential.

Therefore, employees using the whistleblowing hotline should be aware that all precautions will be taken in order to guarantee that their identity is held strictly confidential at each step of the case analysis and management.

Their identity will not be communicated to any person who is likely to be involved or face an internal investigation, even if this person wishes to know them.

An anonymously reported case of an employee with insufficient factual pieces of information to identify the involved persons may not be dealt with.

2.4 Whistleblower's Protection

Reports are to be made in a disinterested manner and in good faith, i.e. the employee needs to be convinced that his/her report is accurate.

The whistleblower will be protected from potential sanctions.

Finally, an error in good faith will not result in any disciplinary action.

However, wilfully abusive denunciations or denunciations intending to cause harm will be subject to sanctions.

2.5 Communicating towards the persons involved

The person targeted in the report whose case is included in the scope of the whistleblowing hotline is contacted by one of the three entitled managers as soon as the data regarding this very person have been registered, in order to keep him/her informed and, if needed, enable him/her, on legitimate grounds, to disagree with these data's management or correct them.

However, when precautionary measures are necessary, notably to prevent that pieces of evidence related to the case are deleted, the person will be informed only after these measures have been taken.

2.6 Conservation of the data collected

The data related to reported cases will be destroyed, kept or archived according to the current regulations.

As soon as data are collected, those data related to a case which is not included in the scope of the whistleblowing hotline will be immediately destroyed.

When the report is not followed by disciplinary or legal proceedings taken by the employer, the reported data are destroyed or archived for two months starting from the day when investigation operations have been closed.

When disciplinary or legal proceedings are taken by the employer against the person targeted or the author of improper reporting, the reported data are retained until the end of the proceedings.