

Ethics & Compliance Committee



Vantiva Ethics & Compliance Committee (effective sept 28th, 2022)

Reporting to the Audit Committee of the Board



ECC



Dan Zambrano
Chair



Cindy Williams
Internal Audit



Tom Sipher
CSR



Olga Damiron
People & Talent



Aline Bourcereau
Secretary



Anurag Sharma
CH and Asia
representative



Alejandro Monge
SCS and Mexico
representative



O Le Balle
CH and Europe
representative

GOVERNED BY THE ETHICS CHARTER PUBLISHED ON BOTH VANTIVA EXTERNAL AND INTERNAL WEBSITE

NAMES AND PICTURES DISPLAYED ON BOTH VANTIVA EXTERNAL AND INTERNAL WEBSITE

MONTHLY MEETINGS (3H MAX)

REPORT TWICE A YEAR TO THE AUDIT COMMITTEE AND TO THE CEO

NB: NATHALIE GIRARD WILL PROVIDE ADMIN SUPPORT TO THE SECRETARY

Scope of work



- ENSURES THAT VANTIVA'S CODE OF ETHICS AND WHISTLEBLOWER POLICY ARE CIRCULATED AND AVAILABLE TO ALL EMPLOYEES, AND IMPLEMENTS ANY AMENDMENTS IT CONSIDERS NECESSARY OR APPROPRIATE;
- ENSURES THAT ALL EMPLOYEES ARE AWARE OF AND FAMILIAR WITH THE CODE OF ETHICS, WHISTLEBLOWER POLICY AND RELATED POLICIES;
- DESIGNS, WITH THE SUPPORT OF LEGAL AND PEOPLE & TALENT, THE TRAINING PLAN ON THE CODE OF ETHICS, WHISTLEBLOWER POLICY, AND RELATED POLICIES, AND OVERSEES THE IMPLEMENTATION THEREOF BY LEGAL AND PEOPLE & TALENT;
- INVESTIGATES PROMPTLY EACH AND EVERY REPORT AND TAKES APPROPRIATE ACTION IF A VIOLATION IS FOUND, UP TO AND INCLUDING TERMINATION OF EMPLOYMENT AND CRIMINAL CHARGES ACCORDING TO APPLICABLE LAWS;
- DECIDES TO USE ANY NECESSARY MEANS, SUCH AS INTERNAL AUDIT OR THIRD PARTIES, IN ORDER TO PERFORM ITS INVESTIGATIONS;
- REPLIES IN THE STRICTEST CONFIDENCE TO ANY QUESTIONS EMPLOYEES MAY HAVE CONCERNING APPLICATION OR COMPLIANCE WITH THE CODE OF ETHICS AND WHISTLEBLOWER POLICY IN SPECIFIC CIRCUMSTANCES;
- RESPONDS TO ALL CONFLICT OF INTEREST'S WAIVER REQUESTS SUBMITTED;
- DEVELOPS, AS NEEDED, APPROPRIATE POLICIES AND PROCEDURES TO FURTHER GOVERN THE COMMITTEE AND ITS ACTIVITIES CONSISTENT WITH THIS CHARTER, THE CODE OF ETHICS, AND THE WHISTLEBLOWER POLICY;
- ASSISTS THE TEAMS UPON REQUEST IN PREPARING AND AUTHORIZING ANY SPECIFIC CODE OF CONDUCT THAT MAY BE NECESSARY FOR A PARTICULAR SUBSIDIARY, BUSINESS DIVISION, DEPARTMENT, OR CORPORATE FUNCTION; AND
- PREPARES, WITH THE BUSINESS UNITS CONCERNED AND WITH CORPORATE COMMUNICATIONS, ANY VERBAL OR WRITTEN COMMUNICATION RELATING TO ETHICS AT VANTIVA AND ANY CONTACTS IN RELATION TO ETHICS, IN PARTICULAR WITH INTERNATIONAL, EUROPEAN UNION, GOVERNMENTAL AND NONGOVERNMENTAL ORGANIZATIONS.

For any question or concern



IF YOU HAVE ANY QUESTION OR CONCERN REGARDING ANY ETHICAL ISSUE, PLEASE CONTACT THE ETHICS COMPLIANCE COMMITTEE AT

ECC@VANTIVA.COM

OR THE CHIEF COMPLIANCE OFFICER AT

CCO@VANTIVA.COM

YOU CAN ALSO SUBMIT A REPORT USING THE DEDICATED WHISTLEBLOWING PLATFORM ETHICSPPOINT AT

VANTIVA.ETHICSPPOINT.COM