



# WHISTLEBLOWER POLICY

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Vantiva’s Code of Ethics (the “**Code**”) requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Vantiva, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

In non-consolidated companies or groups in which Vantiva has minority interests (up to 50%), the Employees representing Vantiva must encourage the application of rules similar to those set out in this Policy.

## REPORTING RESPONSIBILITY

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It is the responsibility of all directors, officers, and employees to comply with the Code.

This Whistleblower Policy applies to all directors, officers, and employees, as well as to third parties, and is intended to enable directors, officers, employees, and any third party with relevant information to report suspected violations, including in the supply chain and within the suppliers of Vantiva, of applicable regulations or of the Code such as **financial, accounting, banking, tax, antitrust and anti-bribery violations, suspected hygiene, health, safety and environment protection violations**, or in relation to the following areas, the list of which being non exhaustive : discrimination and harassment at work, protection of human rights, financial services, products and markets, prevention of money laundering and terrorist financing, product safety and compliance, transport safety, protection of the environment, radiation protection and nuclear safety, food and feed safety, animal health and welfare, public health, consumer protection, protection of privacy and personal data, and security of network and information systems, business relationships with government entities (public procurement), in accordance with this Whistleblower Policy.

For clarity, this Policy does not create any obligation to report any suspected violation.

## NO RETALIATION

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Vantiva will not tolerate retaliation against anyone who has made good faith reports or complaints of violations of the Code. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment according to applicable law.

This Whistleblower Policy is intended to enable employees and any third party to raise serious concerns within Vantiva regarding suspected violations of rules as set forth above in the “**Reporting Responsibility**” section.

## REPORTING VIOLATIONS

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The Code addresses Vantiva’s open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly.

In most cases, an employee’s manager or its Human Resources manager is in the best position to address an area of concern. However, if you are not comfortable speaking with your manager or Human Resources manager, or you are not satisfied with your manager or Human Resources manager’s response, you may contact the Ethics Compliance Committee, which has specific and exclusive responsibility to investigate any and all reported violations. You may also contact the Chairman of the Audit Committee of the Board of Vantiva SA.

If you wish to submit a report, you may also submit a report through EthicsPoint.

EthicsPoint’s telephony- and web-based hotline solution enables employees to easily and confidentially report alleged violations of the Code. EthicsPoint is an independent third party that specializes in providing the tools and information necessary to receive, investigate, analyze and resolve such reports. While Vantiva requests that you disclose your identity when reporting a suspected violation, you may submit a report anonymously if the alleged violation you wish to report is serious and supported by facts. The identity of the individual reporting as well as the report itself will be kept confidential to the fullest extent possible, consistent with the need to conduct an adequate investigation.

You may contact the Ethics Compliance Committee via email at [ecc@vantiva.net](mailto:ecc@vantiva.net).

You may also submit reports to the following address:

**Vantiva**  
**Ethics Compliance Committee**  
**8-10 rue du Renard, 75004 Paris, France**

You can also submit a report using EthicsPoint from a computer or a mobile phone at [www.vantiva.ethicspoint.com](http://www.vantiva.ethicspoint.com) or by phone **+1(866)-492-3362**. Local telephone numbers are available on [www.vantiva.ethicspoint.com](http://www.vantiva.ethicspoint.com).

# INTERNAL CONTROLS IN FINANCIAL, ACCOUNTING, BANKING, AND ANTI-BRIBERY

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As detailed in the Code, the Ethics Compliance Committee is responsible for investigating and resolving all reported complaints and allegations regarding possible violations of rules as set forth above in the “**Reporting Responsibility**” section. The Ethics Compliance Committee shall report to the Audit Committee of the Board of Vantiva SA.

## ACTING IN GOOD FAITH

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Anyone filing a complaint under this Policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code or of applicable regulations. Any allegations that prove not to be reasonably substantiated and which prove to have been made maliciously or to be knowingly false will be viewed as a serious disciplinary offense and may subject the reporter to disciplinary action, up to and including termination of employment, at Vantiva’s sole discretion and according to applicable law.

## HANDLING OF REPORTED VIOLATIONS

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The Ethics Compliance Committee will notify the sender and acknowledge receipt of the reported suspected violation within five (5) business days.

To the extent possible, the identity of the accuser and the report itself will not be disclosed.

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. A feedback will be made to the sender as appropriate, together with a reminder of his/her/their rights of access, rectification, erasure, and objection under applicable privacy regulations.