

Procedure for Collecting & Processing Reports of JCDecaux Group

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1.

ARE YOU CONCERNED BY THE WHISTLEBLOWING SYSTEM ?

This whistleblowing procedure is intended for :

- **Employees, former employees** (when the information was obtained during their employment), **and job applicants** (when the information was obtained during the application process);
- **Shareholders, partners, and voting rights holders** at the entity/s general;
- **Members of the governance bodies;**
- **External¹ and occasional² collaborators;**
- **Contractors of the concerned entity**, their subcontractors, or, in the case of legal entities, the members of the administrative, management, or supervisory bodies of these contractors and subcontractors, as well as their staff members;
- **Any other external person** to the Group who was identified one or more breaches referred to in Section 2 of this procedure.

¹ « **External collaborator** » refers to a person who, although employed by an entity other than the one for or on behalf of which they perform their duties, has an in-depth knowledge of its operations (example : a consultant, a subcontractor, a supplier, or a temporary worker).

² « **Occasional collaborator** » refers to a person who, in the exercise of their duties within the entity, has an in-depth knowledge of its operations (example : an intern).

2.

IN WHAT CASES CAN YOU MAKE A REPORT ?

You can use this Whistleblowing procedure if :

- ▶ You are facing, in France or in a country where JCDecaux Group is present, a situation:
 - **contrary to the Fundamental Ethical Rules** (anti-corruption & influence trafficking, free competition, financial & accounting transparency), as stated by [Ethical charter](#) of JCDecaux Group **(1)**.
- ▶ You are facing, in France or in a country where JCDecaux Group is present, a situation **(2)**:
 - of **crime or offense**;
 - of **violation or attempted concealment of a violation of an international commitment** regularly ratified or approved by France, of a **unilateral act of an international organization** based on such commitment, of the law or regulation, of European Union law; or
 - of **threat or harm to the public interest**.
- ▶ You are facing, in France or in a country where JCDecaux Group is present, of:
 - a **serious violation of human rights and fundamental freedoms and/or the health and safety of individuals and/or the environment**, resulting from the activities of the company and/or its subsidiaries, and/or the activities of subcontractors or suppliers **(3)** being **punishable by law or regulation** in France, and may also be **contrary to the principles of the International Charter of Fundamental Social Values** of the JCDecaux Group in the areas of human rights, fundamental freedoms, health/safety, and/or the environment, and/or **to principles No. 7, 8, and 9 of the United Nations Global Compact (1)**.

Important !

Facts, information, or documents covered by national defense secrecy, medical confidentiality, attorney-client privilege, the secrecy of investigation and judicial inquiry, and the secrecy of judicial deliberations cannot legally be the subject of a report within the framework of this Whistleblowing system.

(1) Available on Website & intranet Of JCDecaux Group

(2) « Sapin II » law, No. 2016-1691 dated 09/12/2016

(3) law on the Duty of Vigilance No. 2017-399 dated 27/03/2017

3.

TO WHOM SHOULD YOU ADDRESS YOUR REPORT?

The JCDecaux Group has implemented a secure and encrypted reporting tool, available through an external secure platform, accessible 24/7 to all employees and stakeholders from any type of device, in the 17 languages used within the Group.

➔ Alert **the Compliance Referent** responsible for locally handling reports.

By accessing the secure platform below:

▶ [Click here](#) ◀

➔ Then choose **your language** and **the relevant country**, available on the homepage and the reporting form.

➔ Once the **secure inbox** has been created, allowing confidential communication with the person responsible for handling your report, and **the reporting form** has been duly completed by you, simply click "submit" to send it.

Note

You still have the option to report directly to your immediate supervisor as an employee of the JCDecaux Group. Your supervisor will review your report in strict confidence, except for a report they will prepare for the Compliance Referent. You will then be asked to formalize your report through the secure platform for processing.

Note

Depending on the applicable regulations in your country, the option to report via a dedicated voicemail system may be available. The conversation will then be recorded on a durable and retrievable medium, and the corresponding data will be stored under the security and confidentiality conditions outlined in this procedure.

Important !

Alternatively to reporting via JCDecaux's internal Whistleblowing system and in accordance with European regulation, you have the option to make an external report by directly contacting (i) the competent authority³, (ii) the defender of rights, (iii) the judicial authority, or (iv) an institution, body, or agency of the European Union competent to collect information on violations of European Union law.

³ List of Competent External Authorities for France Detailed in [Decree No. 2022-1284 of October 3, 2022, Regarding Procedures for Collecting and Handling Reports Issued by Whistleblowers and Establishing the List of External Authorities Instituted by Law No. 2022-401 of March 21, 2022, Aiming to Improve the Protection of Whistleblowers:](#)

4.

THE CONTENT
OF YOUR REPORTSpecific
& objective
facts

- ▶ The information provided within this Whistleblowing system must be in **good faith** and **without direct financial compensation, be formulated objectively, and be sufficiently precise** to allow for the verification of the alleged facts
- ▶ **Only data necessary for the examination of the validity** of the alert should be disclosed, and the wordings used to describe the nature of the reported facts should indicate their presumed nature.
- ▶ **The information must include at a minimum** the date(s) of the incident(s), the name(s) of the person(s) involved, and any evidence necessary for verifying the alleged facts.

Facts
personally
witnessed

- ▶ You must have observed the facts subject to your report **within the framework of your professional activities or have personally become aware of them** (as listed in point 2 of this procedure).

Your identity

- ▶ **Your report can be anonymous, although this is not encouraged.** Non-anonymous reports are easier to process, and communication with you will be facilitated.

Important ! This alert engages you

Any alert made in good faith and without direct financial compensation cannot lead to any sanction or retaliation against its author, even if the reported facts are ultimately found to be inaccurate or compliant with the regulations in force. The use of the reporting system remains optional and at the discretion of the employee.

Conversely, any employee of a company within the JCDecaux Group who misuses the system or reports facts in bad faith, with the intention of causing harm or with knowledge of their falsity, may be subject to disciplinary action in accordance with the Internal Regulations (or any comparable provision), depending on the applicable local legislation in the respective JCDecaux entity.

Non-employee collaborators of a company within the JCDecaux Group may also face legal action for the bad faith use of this reporting system or with the intention to cause harm.

5.

THE PROCESSING
OF YOUR ALERTAdmissibility
& processing
of the report

- ▶ You will be **promptly** notified, and at the latest within a period of 7 Business days, of the receipt of your report through a dated and signed acknowledgment of receipt. The acknowledgment does not imply the admissibility of the report. A report is deemed inadmissible when it clearly falls outside the scope of the alert system (see points 2 & 4 above). If the report is deemed inadmissible, you will be informed of the reasons justifying this inadmissibility.
- ▶ All actions taken in the processing of your alert, especially in the case of a thorough internal investigation, will be conducted **in accordance with the JCDecaux Group's Internal Investigation Procedure, according to modalities and guarantees compliant with the legal framework.**
- ▶ Within a **maximum period of 3 months from the date of sending the acknowledgment of receipt**, depending on the seriousness of the reported facts and the conclusions of the internal investigation, provided that the report is not anonymous and is deemed admissible, you will be informed of the measures envisaged or taken to remedy the situation and of the closure of your file.

Respect the
Confidentiality
of the report

- ▶ In accordance with the regulations in force, this Whistleblowing system ensures **strict confidentiality** of both **your identity as the author of the report, the identity(ies) of the person(s) targeted by your alert**, any person mentioned therein, the facts subject to the report, and, generally, **all information** disclosed.
- ▶ **Any individual with access to** information within the scope of this alert procedure, its processing, and related investigations, is bound **by a strict obligation of confidentiality.**
- ▶ **The elements that could identify you as the whistleblower** cannot be disclosed without your consent, except if the person responsible for collecting and processing reports is required to report the facts to the judicial authority. In this case, you will be informed in writing, unless such information is likely to compromise the judicial procedure. Similarly, **the elements that could identify the person(s) targeted by your report cannot be disclosed** until the validity of the alert is established.
- ▶ Persons disclosing confidential information are liable to legal action, with **penalties determined by the specific** local laws applicable to the subsidiary **and/or disciplinary sanctions.**

Obstruction
of a report

- ▶ Any person who obstructs, in any way, the transmission of a report is liable to legal action, with **penalties determined by the specific** local laws applicable to the subsidiary **and/or disciplinary sanction.**

Absence of retaliation following a report

- ▶ The Group will not exercise, nor tolerate, **any sanction, dismissal, or discriminatory measure**, whether direct or indirect, against a whistleblower acting in good faith within the scope of this procedure, even if the reported facts subsequently prove to be inaccurate or do not lead to any further action.
- ▶ Likewise, an individual **cannot be excluded from a recruitment process, access to an internship, or a period of professional training**, due to a report made within the scope of this procedure.
- ▶ **Are protected also (i) facilitators**, meaning any natural or legal person of private law with a non-profit purpose who undertakes to assist the whistleblower in making their report, **(ii) individuals associated with the author of the report** (i.e., those who might be subject to retaliation in the course of their professional activities, clients, or recipients of their services), **and legal entities controlled by the author of the report**, for which the latter works or with which they are associated in a professional context.

The processing of personal data

For more information regarding how JCDecaux handles personal data in the context of collecting and processing reports, as well as the duration of conservation and archiving, please refer [the Professional Whistleblowing System Privacy Policy](#)

Activity report

- ▶ **An annual report** is prepared by the Group Compliance Department. This report covers all reports received and processed during the previous year.
- ▶ This report **includes a quantitative and qualitative analysis** of the data, including : the types of themes reported, the acceptance rates of reports, and the types of measures taken in response.
- ▶ **It is submitted annually to the Ethics & CSR Committee** as well as to the Group's management body.