



WHISTLEBLOWER CHARTER



RÉMY COINTREAU

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01

PURPOSE OF THE ETHICS LINE

While conducting business or performing your duties, you may encounter situations that raise questions related to ethics and integrity, or you may observe questionable conduct.

In fostering a culture that is open to reporting, Rémy Cointreau aims to prevent conduct that does not comply with applicable laws or Group procedures. To accomplish this, we have created an **Ethics Line** to encourage employees and business partners **to report any violations, breaches or dangers they observe or that they may be aware of.**

The Ethics Line supplements the existing channels for reporting information to line managers or the Human Resources department. It is an additional reporting method, and employees who do not use it will not be sanctioned.

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WHO CAN LAUNCH AN ALERT?

WHAT IS A WHISTLEBLOWER?

A **whistleblower** is an individual who impartially and in good faith exposes or reports a crime or offense, a serious, obvious violation of a code, charter, procedure, law or regulations, or a serious threat or harm to public interest, of which he or she had personal knowledge.



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WHISTLEBLOWING CASES

Whistleblowing cases or observed violations can apply to a wide variety of situations. For illustrative purposes and for guidance, we have provided some examples below:

a crime or offense, any violation of the law or regulations

e.g. a theft, slanderous or defamatory statements

risks to human health and safety

e.g. defective electrical equipment

environmental damage

e.g. pollution

unauthorised use of Company funds

e.g. spending for illegal purposes

inappropriate or improper behaviour

e.g. abuse of power, harassment

a serious breach of professional standards

a violation of the Group's Code of Ethics

all forms of discrimination

e.g. based on race, colour, faith, ethnic background, disability, age, gender, sexual orientation, marital status or social class

a violation of the Group's Anti-Bribery Code of Conduct

any conduct that violates our internal policies

actual or suspected corruption, influence peddling or fraud

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HOW CAN I LAUNCH AN ALERT?

— YOU CAN LAUNCH AN ALERT THROUGH THE ETHICS LINE



BY SENDING AN EMAIL

to : ethics.alert@remy-cointreau.com ;

or



BY FILLING OUT THE FORM

on the Rémy Cointreau Group's website at

<https://www.remy-cointreau.com/en/home/contact-us/speak-up/>

The Rémy Cointreau Group's Compliance department receives all the information conveyed through the Ethics Line.

You can also launch an alert through your **line manager** or the **Human Resources department**.

If no action is taken within a reasonable time, the whistleblower may refer the matter to the appropriate **legal or administrative authority or to professional organisations**.

As a last resort, if Rémy Cointreau or the relevant authorities fail to respond to the concerns raised **within three months, the whistleblower may publicly disclose the alert**.

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RECEIVING AND DEALING WITH THE ALERT



The way the alert is handled depends on the nature of the facts reported.

In all cases, **the Group** will always:

- record the alert and acknowledge receipt promptly;
- check that the alert is admissible and take the appropriate measures within days of the alert being recorded;
- respect the confidentiality;
- protect personal data (see Annex 1);
- notify the whistleblower of the outcome of the investigation.

Depending on the nature of the facts reported, **Rémy Cointreau** may:

- request more information from the whistleblower;
- launch an internal or independent investigation;
- take disciplinary action;
- refer the matter to the relevant legal authorities.

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PROTECTION AND CONFIDENTIALITY

FOR THE WHISTLEBLOWER

Rémy Cointreau commits to handling the whistleblower's alert with the **UTMOST CONFIDENTIALITY**.

The **Ethics Line** guarantees the confidentiality of the whistleblower's identity, that of the individuals targeted in the alert and that of the information received.

CAN I LAUNCH AN ALERT ANONYMOUSLY THROUGH THE ETHICS LINE?

We encourage employees not to launch an alert anonymously because that will hinder our ability to confirm and investigate the alert. However, if a whistleblower insists on remaining anonymous, the alert will be accepted provided that the seriousness of the facts in question is established.

HOW IS A WHISTLEBLOWER PROTECTED?

As long as whistleblowers use the Ethics Line in **good faith**, they will not risk **any disciplinary action**, even if the facts later turn out to be **incorrect** or **no action is taken on them**.

We prohibit any retaliation against employees who raise their concerns in good faith regarding suspected violations or dangers in the workplace.

Thus no individual may be excluded from a recruitment procedure, and no employee may be sanctioned, dismissed or subject to any discriminatory measure – particularly with regard to compensation or promotion – for having lawfully launched an alert.

HOWEVER, whistleblowers who use the Ethics Line wrongfully, maliciously or in bad faith may put themselves at risk of penalties or legal action.

The whistleblower may be held **personally liable** under civil law, or face **criminal liability** for false allegations or defamation.

06 PROTECTION AND CONFIDENTIALITY

_ FOR THE INDIVIDUALS CONCERNED BY THE ALERT



If we receive an alert **THAT CONCERNS YOU**, you will be notified **within a reasonable time**.



YOU MAY ACCESS THE INFORMATION THAT CONCERNS YOU as part of the whistleblowing procedure. Only the information that concerns you may be disclosed to you. Other information on the identity of the whistleblower or of third parties will remain **confidential**.

ANNEX 1

PERSONAL DATA PROTECTION

DATA CONTROLLER AND PURPOSES OF THE PROCESSING

CLS Rémy Cointreau is the data controller for whistleblower alerts launched through the Ethics Line.

Data are processed to comply with a legal obligation (notably, the Sapin II law with regard to reporting a crime, offense, or serious, obvious violation of the law, or fighting corruption and influence peddling) and in the legitimate interest of the recipient of the alert for other processing purposes (e.g. violation of the Code of Ethics).

PERSONAL DATA COLLECTED

During the examination phase of an alert, the facts reported are investigated and we ensure that only the information that is relevant and necessary for the purposes of the processing is collected and/or stored in connection with the Ethics Line. This applies to the following categories:

- the whistleblower's identity, duties and contact details;
- the identity, duties and contact details of the individuals subject to the alert;
- the identity, duties and contact details of the individuals receiving or processing the alert;
- the facts reported;
- information gathered during the process of verifying the facts reported;
- reports on the verification procedures;
- action taken on the alert.

RECIPIENTS OF THE DATA

A limited number of individuals will be informed of the alerts launched through the Ethics Line and will have access to the information contained in the alerts. All individuals involved in an investigation will be bound by an obligation of confidentiality.

The Rémy Cointreau Group's Compliance department receives all the information conveyed through the Ethics Line. Only as strictly necessary, the Compliance department may call on one or more additional in-house individuals and/or outside consultants to help examine the alert. The courts and authorities responsible for law enforcement may also be the recipients of an alert. In addition, if it is necessary to expand the investigation of a violation, the whistleblower alert may be transferred to the corresponding department and employees in the Rémy Cointreau subsidiary allegedly concerned by the reported violation.

Information that identifies the whistleblower may be disclosed only with the individual's consent, except when being disclosed to the judicial authority. Similarly, information that identifies the individual targeted in a whistleblowing alert may be disclosed only after the alert is determined to be valid, except when being disclosed to the judicial authority.

To ensure the continuity of personal data protection, the transfer of these data outside the European Union is subject to specific rules. As such, any transfer of data outside the EU is governed by data protection clauses.

DATA STORAGE PERIODS

Personal data are stored in a form enabling the identification of individuals only for the period of time strictly necessary to accomplish the purposes:

- data relating to a whistleblowing alert deemed to be outside the scope of the process are **destroyed immediately or anonymised;**
- when no action is taken on an alert that falls within the scope of the process, the data relating to this alert are **destroyed or anonymised within two months of the conclusion of the verification procedures;**
- when disciplinary or legal action is taken against an implicated individual or the individual who launched an abusive alert, the data relating to the alert may be stored **until the end of the proceedings or statute of limitations on appeals against the decision.**

Except for situations where no action is taken on the alert, the data controller may store the data in the form of temporary archives to ensure that the whistleblower is protected or to help as certain ongoing infractions.

YOUR RIGHTS

You are entitled to access your personal data, have them rectified or erased, and to limit their processing. In certain cases you may also have the right to object to the processing. In addition, you are entitled to file a complaint with your data protection authority. If you would like to learn more about how we process your personal data or to exercise your rights, please write to the Data Protection Officer at:

privacy@remy-cointreau.com.



RÉMY COINTREAU

Des terroirs, des hommes et du temps