



WHISTLEBLOWER CHARTER



RÉMY COINTREAU

# 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 a Whistleblowing system (the “**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; employees who choose not use it will not be sanctioned.

# 02 - WHO CAN LAUNCH AN ALERT?

## WHAT IS A WHISTLEBLOWER ?

A whistleblower (the **Whistleblower**) is an individual who exposes or reports without direct financial compensation and in good faith a crime or offense, a violation or an attempt to hide a violation of a law, regulation, code, charter, procedure or a threat or harm to public interest, of which he or she has knowledge.



# 03 - 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 <i>e.g. a theft, slanderous or defamatory statements</i>	All forms of discrimination <i>e.g. based on race, colour, faith, ethnic background, disability, age, gender, sexual orientation, marital status or social class</i>
Risks to human health and safety <i>e.g. defective electrical equipment</i>	A violation of the Group's Code of Conduct
Environmental damage <i>e.g. pollution</i>	Any conduct that violates our internal policies
Unauthorised use of company funds <i>e.g. spending for illegal purposes</i>	Actual or suspected corruption, influence peddling or fraud
Inappropriate or improper behaviour <i>e.g. abuse of power, harassment</i>	A serious breach of professional standards



# 04 - 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](mailto:ethics.alert@remy-cointreau.com) ;

ou



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.



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You can also request an on-site or a videoconference meeting from the Group's Compliance Department to launch the alert orally. You can also launch an internal alert through your line manager or the Human Resources Department.

The Whistleblower may refer the matter to the appropriate authorities as permitted by local law.

# 05 - 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** (in writing) **within 7 working days** from its receipt;
- Check that the alert is admissible and take the appropriate measures within days of the alert being recorded;
- Reserve the right to reject an alert that does not meet legal requirements, and to inform the Whistleblower about this decision and the reasons behind this decision;
- Respect the integrity and confidentiality of the information collected and protect personal data (see Annex 1);
- **On request**, commit to receive within **20 working days** a Whistleblower requesting to **launch an alert orally** (on-site or videoconference meeting);
- Communicate information (**in writing**) to the Whistleblower about the proposed or **taken measures** to determine the accuracy of the allegations and, where appropriate, to remedy the subject and the grounds of the alert **within 3 months** as of the date of the alert acknowledgement,
- Notify the Whistleblower (in writing) of the **closure of the alert**.
- Ensure that the management is aware of the alert in an impartial way.

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

- Request more information from the Whistleblower, including necessary document(s);
- Launch an internal or independent investigation;
- Take disciplinary action(s);
- Refer the matter to the relevant legal authorities.

# 06 - CONFIDENTIALITY AND PROTECTION

## 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 as well as the confidentiality of the individuals targeted in the alert, individuals mentioned in the alert and 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 facts in question are 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, including threats and attempt to retaliate, against employees who raise their concerns in good faith.

We are committed to ensuring that 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 and/or legal action.

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

## FOR THE INDIVIDUALS ASSISTING THE WHISTLEBLOWER (FACILITATORS)

A Facilitator is a natural person, or a nonprofit legal person governed by private law who assists the Whistleblower to launch an alert or to make a disclosure.

Facilitators receive a protection equivalent to the Whistleblower's protection when the alert is launched in good faith and complies with legal requirements. As for Whistleblowers, Facilitators are protected against retaliation, including threats and attempt to retaliate.

The Ethics Line guarantees the confidentiality of information collected from the Facilitator and protects his/her personal data (Annex 1). Elements enabling identification of the Facilitator may be disclosed only with the Facilitator's consent or at the request of the judicial authority.

## ANNEX 1 - PERSONAL DATA PROTECTION

### Data controller and purposes of the processing

CLS Rémy Cointreau located 21 rue Balzac 75008, 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 (and the Facilitator as the case may be);

The identity, duties and contact details of individuals subject to the alert;

The identity, duties and contact details of 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 and the Facilitator 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 ascertain 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**.