

DATA HANDLING NOTICE

2020

This information notice aims at informing on the conditions under which concerns may be raised, processed and further addressed in the framework of the Alstom Alert Procedure. Alstom is particularly attentive to laws and regulations concerning privacy and protection of information concerning individuals regardless of their location. The Group does not communicate personal information to third parties, except to the extent necessary and permitted by applicable laws or regulations.

1. Purpose and scope of the Alert Procedure. Any person has the possibility to report a concern about misconduct – either actual or potential – as set forth in the Alstom Alert Procedure and in accordance with local legal requirements. Any alert that would fall outside of the scope of the matters mentioned above will not be considered under the Alstom Alert Procedure. Only data which is relevant, adequate and directly linked to the scope of the Alert Procedure as well as strictly necessary for investigating the alleged facts will be taken into account. In those countries where such notification is necessary, the implementation of the Alert Procedure has been filed with relevant local Data Protection Authorities.

2. Optional nature of the Alert Procedure. The Alert Procedure does not aim to replace usual internal information channel mechanisms. The use of the Alert Procedure is not mandatory, and no employee may be sanctioned for not using this Procedure.

3. Data processed in the framework of the Alert Procedure. A report submitted through the web portal may contain personal data about the reporter and about persons on whom the report is made. Data processed in the framework of the Alert Procedure may cover: - the name, function and contact details of the reporting person, - the name, function, and contact details of persons on whom the report is made, - reported facts – i.e. a factual description of the misconduct as well as a description of the circumstance of the incident, (e.g. time and place of the incident, the affected Alstom entity, and whether management has knowledge of the incident), - information gathered in the course of the investigation process and summary of investigation operations, - information concerning the follow-up to the alert.

4. Confidentiality. Alstom has taken all measures and guarantees to secure the communication of data under the Alstom Alert Procedure. All information and data processed in the framework of the Alert Procedure will be kept confidential, unless their disclosure appears necessary to governmental or judicial bodies in the course of the investigation. Persons in charge of handling alerts are bound by a duty of strict confidentiality with respect to the information that they receive when processing the alerts. The identity of the author of an alert shall never be disclosed to the person on whom the report is made.

5. Recipients of reports and data processed under the Alert Procedure. Data processed under the Alert Procedure will be communicated to a restricted number of persons within Alstom that are specially entrusted with handling the reports in accordance with the approved internal routing procedure. In addition, for the purpose of implementing the

Alert Procedure, data will be communicated to NAVEX Global which has been contracted as the operator of the web portal, comprising the web portal pages, the hotline through which you may report an incident, as well as the database in which the personal data and information that you report are stored. NAVEX Global has undertaken strict contractual obligations regarding Data Protection and Privacy which are designed to ensure an adequate level of protection to the processing of transferred data in accordance with European data protection law. NAVEX Global processes the reports in accordance with pre-defined instructions of Alstom and does not use any report data for its own purposes.

6. Retention period of reports and data processed under the Alert Procedure. When the investigation process do not lead to disciplinary or legal action, reports and data processed under the Alert Procedure will be destroyed or archived within two months from the end of the investigation process or after the end of any judicial proceedings relating to the report. Reports and data which are either out of the scope of the Alert Procedure or which do not give rise to an investigation will be immediately deleted or archived.

7. Use of the Alert Procedure in Good Faith. An employee using the system in good faith will not be subject to disciplinary measures for reporting a concern, even though the reported facts eventually appear inaccurate or do not give rise to any proceedings. However, any voluntary misuse of the system by an employee may subject the employee to disciplinary measures or to legal action.

8. Rights of access, rectification, erasure, restriction and objection to the processing of data under the Alert Procedure. As a data subject, any employee in the European Union – either the author of an alert or the person on whom the report is made – has a right to access, rectify, or erase his/her personal data and the right to Alstom Alert Procedure – Data Privacy Statement restrict or object to the processing of his/her personal data – provided that this is based on legitimate grounds. These rights may be exercised by contacting: data.privacy@alstom.com. The identity of the author of an alert shall never be disclosed to the person on whom the report is made on the grounds of rights of access of individuals.

9. Information notice rights of the person on whom the report is made. Upon receipt of a report, the person on whom the report is made will be informed that an alert concerning him/her was received, unless steps must be taken beforehand to prevent a potential destruction of evidence. When such steps appear necessary, the information notice will be provided after these steps are implemented. To allow the person on whom a report is made to express his/her views and be able to access his data, the person will be given an information notice with the following elements:

- The identity of the data controller,
- The identity of persons in charge of the internal investigation,
- Alleged facts,
- Possible recipients of the alert,
- Conditions for exercising the rights of access, rectification, erasure, restriction and objection to the processing of his/her data.