

# Carrefour

Procedure for gathering and processing  
whistleblowing data

## WHISTLEBLOWING SYSTEM



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## 1. Preamble

1. Carrefour has set up the Carrefour Ethics Line, an online and telephone system to alert the Group to breaches of its Principles of Ethics and its Policy against corruption and influence-peddling. This system complies with each country local regulations.
2. This system is available to the Group's employees, external and occasional staff and allows them, in defined areas, to report actual, potential or presumed problems of which they have personal knowledge and which could seriously affect the Group's business and reputation and/or engage the Group's liability.
3. Although the right to raise an alert is a means of expression available to everyone in accordance with the ethical commitments of the Carrefour Group, it implies a high level of accountability from the whistleblowers.
4. The Carrefour Ethics Line is an alternative to the existing channels and using it is entirely at the discretion of the employees, as well as the Group's external and occasional staff, suppliers and service providers. Its use is therefore optional.
5. This system is managed under the responsibility of the Risks & Compliance Department of the Carrefour Group, which receives and processes alerts.

## 2. Purpose

6. This procedure defines the whistleblowing system implemented by the Carrefour Group. It regulates the receipt, analysis and processing of alerts raised, based on the principle of confidentiality and individual rights.

## 3. Scope of the whistleblowing system

### 3.1 Geographic scope

7. This procedure is common to all companies in the Carrefour Group, wherever they are based. The system is adapted for each country to ensure it complies with local regulations.

### 3.2 Legal scope

8. The whistleblowing system is available to employees and external and occasional staff who have personal knowledge of proven or suspected facts that may constitute:
  - a crime or offence (*in particular corruption, breach of competition law, harassment, discrimination or accounting and financial concerns*);
  - a serious and manifest breach of laws or regulations;
  - a threat or serious damage to the general interest (*i.e. health, safety or public welfare*);
  - conduct or a situation contrary to "Our Principles of Ethics";
  - Potential or actual serious violation relating to human rights and fundamental freedom
  - Potential or actual serious violation relating to human health and safety
  - Potential or actual serious violation relating to the environment

- deliberate concealment of such acts;
- Retaliation against a person for having raised an alert or having been involved in processing an alert.

9. However, no alerts in any format may relate to facts that are covered by national defence security, medical secrecy or legal privilege between lawyer and client.

### 3.3 Scope of persons concerned

10. The Carrefour Ethics Line is open to the following persons:

- any employee of a Carrefour Group company: employees, interns, etc.
- any external and occasional employee, namely a third party providing professional assistance to a Carrefour Group entity, such as temps, service providers, suppliers, agents, consultants.

## 4. Definition

11. The following terms have the following meaning in the context of this procedure:

- "alert": information provided by the whistleblower via the whistleblowing system.
- "external employee": a person who although employed by an entity other than the one at which or on whose behalf they work, has extensive knowledge of the latter's operation.
- "occasional employee": person who acquires an extensive knowledge of the company's operation in the course of their work (intern, etc.).
- "whistleblower": any person raising an alert.
- "subject of the alert": person who is the subject of the alert or targeted in the alert.
- "persons who need to know the content of the alert": persons authorised by Carrefour to know about alerts, and who are subject to non-disclosure agreement.
- "POC (point of contact)": Xavier Guizot, Carrefour Group's Director Risks & Compliance.

## 5. General principles of the whistleblowing system

### 5.1 Subsidiary nature

12. The Carrefour Ethics Line is an alternative to the existing preferred internal channels: manager, Human Resources Department, Legal Department or Ethics Committee. Use of the Carrefour Ethics Line is voluntary, and is entirely at the discretion of the employees, as well as external and occasional employees.

## **5.2 Optional, except in Spain for incidents classified as "criminal offences", where raising an alert is mandatory**

13. Use of the Carrefour Ethics Line is not compulsory, which means that employees cannot be sanctioned for not using it.

## **5.3 Security and confidentiality**

14. Confidentiality of information is guaranteed at each stage of the whistleblowing process, whether gathering, communicating or storing information.

15. Only a limited number of people are assigned to process alerts. They are subject to a non-disclosure agreement. They have received instruction on the processing of personal data.

## **5.4 Protection of the whistleblower and non-abuse**

16. The whistleblower may not under any circumstances be subject to retaliations, sanctions or pressures of any kind whatsoever for having raised an alert in good faith, even if the facts subsequently prove incorrect, incomplete or are not followed up.

17. If abuse occurs, the whistleblower should report it immediately to the POC, who will take all appropriate measures to protect the whistleblower in such circumstances and ensure that this treatment ceases.

18. The perpetrators of such behaviours or retaliations will be liable to sanctions.

19. The whistleblower cannot be barred from a recruitment procedure or access to a professional training course.

20. The whistleblower cannot be sanctioned, dismissed or subjected to direct or indirect discriminatory measures for reasons linked to the alert.

21. However, knowingly disclosing false or misleading information will not be tolerated. Any whistleblower raising an alert in bad faith, for example by providing false information about someone with the intention of damaging or infringing their reputation, may be liable to disciplinary measures, or even criminal sanctions depending on the regulations in the country concerned.

# **6. Details of the alert process**

## **6.1 Procedures for raising an alert**

21. The Carrefour Ethics Line can be activated in two ways:

- online via a dedicated website;
- or by phone;

using the following procedure.

### 6.1.1 Online alert

22. A whistleblower who wishes to raise an alert can use the form available on the following 4 URLs, which link to a page where they can select their language according to their country of residence:

- [Ethique.carrefour.com](https://ethique.carrefour.com)
- [Ethics.carrefour.com](https://ethics.carrefour.com)
- [Etica.carrefour.com](https://etica.carrefour.com)
- [Etyka.carrefour.com](https://etyka.carrefour.com)

23. The whistleblower will then be asked to follow the steps listed below:

- select the country from which he/she are emailing;
- select the country in which the incident occurred;
- choose the relevant Carrefour Group Business Unit;
- choose a typology;
- select its relationship with Carrefour;
- state the facts underlying the alert;
- choose whether or not to remain anonymous and, if applicable, input its particular.

24. Following receipt of the alert, notification will be sent to the POC so that he can examine the details of the alert securely.

25. After the alert has been submitted, a notification will be sent to the whistleblower, informing him/her:

- that the alert has been duly noted;
- of a reasonable provisional timescale for examination of admissibility, given that the maximum period for this process is 45 days after receipt of the alert;
- that he/she may, if necessary, be contacted to obtain any further information required for the investigation phase;
- that he/she can provide any further information they might possess;
- of the procedures for notifying them of the follow-up action on the alert (inadmissible, admissible, need for further details).

26. Once the whistleblower has posted its alert online, he/she will be asked to set a password. After submitting their alert, he/she will receive a report number.

27. Using these personal identifiers (report number and password), the whistleblower can go back online at a later date to:

- track the status of their alert;
- make any changes;
- answer requests for additional information.

## 6.1.2 Telephone alert

28. The whistleblower may also submit its alert by calling the hotline for their country of residence:

Country	Phone Step 1	Phone Step 2
Argentina	0800 444 4744	
Belgium	0 800 100 10	855 409 0182
Brasil	0800 892 0708	
China	4006013652	
France	0800 90 8562	
Italy	800 783210	
Poland	00 800 151 0163	
Roumania	800 400 836	
Spain	900 814 793	
Taiwan	00 801 102 880	855 409 0182
Cambodia	1800209354	
Hong Kong	800 96 1764	
India	000 117	855-409-0182
Turkey	0811 288 0001	855-409-0182
Vietnam	1 228 0288 ou 1 201 0288	855-409-0182

29. The whistleblower will then be asked to follow the steps listed below:

- connect to a telephone operator;
- provide information on its country of residence;
- provide information on the country in which the incident occurred;
- choose the relevant Carrefour Group Business Unit;
- choose the allegation category;
- provide information on its relationship with Carrefour;
- state the facts underlying the alert;
- choose whether or not to remain anonymous, and provide its particular, if applicable.

30. Once these steps have been completed, the whistleblower will set a password and receive a report number.

31. Using these personal identifiers (report number and password), the whistleblower can phone again at a later date in order to:

- track the status of their alert;
- make any changes;
- answer requests for additional information.

## 6.2 Methods of communicating facts, information and documents

32. The whistleblower should provide all the facts, information and documentation to support their alert in any form or medium.

33. The whistleblower can send the facts, information and documentation regarding the alert, using the specified alert transmission procedures.

34. For all other communication with the whistleblower, the persons who need to know about the alert will use the channels referred to in the clause "Exchanges between the whistleblower and the recipients of the alert".

35. The whistleblower will also use these channels when they wish to communicate.

36. The whistleblower's attention is drawn accordingly to the importance of following these procedures in order to keep the alert and their identity confidential.

### **6.3 Exchanges between the whistleblower and the recipients of the alert**

37. All exchanges between the whistleblower and the recipients authorised to know about alerts and vice versa will take place:

- directly via the website, using the report number and password;
- or by telephone after verification of the whistleblower's identity.

38. To maintain the confidentiality of the exchanges between the whistleblower and the recipients authorised to know about the alert, the dedicated communication systems must be used.

## **7. Alert classification**

### **7.1 Data quality**

39. A whistleblower who decides to use the whistleblowing system must do so only if they have adequate and objective reasons to believe that irregular or inappropriate incidents or behaviours might pose a serious risk to Carrefour Group.

40. The wording used in all alerts must be objective, relevant and appropriate and must be directly related to the scope of the whistleblowing system.

41. Value judgements or subjective comments on the behaviours of individuals will be disregarded. Such information must not be included in the alert.

42. The facts must be set out clearly, succinctly and exhaustively and must be strictly necessary for verification of the alleged incidents.

43. The terms used to describe the nature of the facts reported must clearly indicate their presumed nature.

### **7.2 Type of data processed**

44. The whistleblower may only mention the following categories of data in the alert form:

- identity, position/entity and particulars of the whistleblower;
- country of residence;
- identity, positions and particulars of the persons who are the subjects of the alert;
- the reported facts.



45. The POC and persons who need to know about the alert may only process the following categories of data:

- information provided by the whistleblower;
- information gathered in the course of verifying the reported facts;
- identity, positions and particulars of the persons involved in gathering information on or processing the alert;
- report or summary of verification procedures;
- follow-up action on the alert.

## 8. Processing an alert

### 8.1 Identity of the whistleblower

46. Potential whistleblowers may issue an alert anonymously or otherwise.

47. Raising an alert and disclosing one's identity:

- empowers the users of the system and limits the risks of whistleblowing slip-ups, denunciation and false accusations;
- mitigates any retaliation against the whistleblower;
- makes it easier to process the alert by asking the whistleblower for additional details.

48. The identity of the whistleblower will be kept confidential at every stage in all cases, from receipt to processing of the reported situation, and shall not be disclosed unless otherwise stipulated by law or regulations. Information that can identify the whistleblower may not be disclosed, except to judicial authorities, without the whistleblower's consent.

### 8.2 Persons in charge of alert processing

49. In the context of the whistleblowing system, whistleblowing data is gathered and processed by:

- the POC of Carrefour Group, Xavier Guizot (Director Risks & Compliance);
- the members of the Ethics Committees;
- persons who may be involved in completing the investigations.

### 8.3 Verifying the admissibility of the alert

50. Once the alert has been sent to the POC, he will carry out an impartial and objective examination of its admissibility, to decide whether the alert falls within the scope of the system, in compliance with the laws in force in each country.

51. If the alert is outside the scope of the system, the whistleblower will be notified accordingly and directed to other channels: manager, HRD, the Legal Department or the Ethics Committee in their country of residence.

52. If the alert falls within the scope of the system, the POC will assess the relevance of the alleged facts and examine the alert using the procedures specified below.

## 8.4 Alert processing procedure

53. After verifying the admissibility of the alert, the POC will either:

- declare the alert inadmissible if the relevant facts are outside the scope of the alert procedure, and direct the whistleblower to the normal internal communication channels (line manager, employee representatives, HR, etc.).
- classify the alert as "no action required", in particular if the relevant facts:
  - are reported by a whistleblower who has manifestly provided a false identity;
  - are irrelevant;
  - are non-circumstantial;
  - are clearly unfounded and/or reported in bad faith;
  - have already been investigated and classified as "no action required", when checks fail to show any new information that justifies further checks;
  - are circumstantial and verifiable, but given the results of checks, it is not considered necessary to activate further investigation.
- announce further investigation. Depending on the type of alert, the relevant departments may be involved in this procedure. In addition, any person with the relevant expertise on the facts described in the alert may also assist. These persons will be subject to an enhanced non-disclosure agreement to protect the identity both of the whistleblower and the subjects of the alert.

## 9. Data storage period

54. Data gathered in relation to a given alert and:

- which are outside the scope of the alert system;
- which are not followed by checks;

will be destroyed or archived immediately, after anonymization.

55. Gathered data on which checks are carried out will be anonymised and then destroyed or archived:

- within 2 months after the completion of checks, when the alert is not followed by disciplinary or legal procedure;
- on completion of the procedure and at the end of the limitation period when disciplinary or legal procedures are initiated against the person targeted in the alert or a person raising a false alert.

56. Personal data entered in the database will be deleted at the end of these storage periods, and only information required to generate statistical analysis reports will be retained.

## 10. Confidentiality

57. Carrefour Group has adopted the necessary measures to ensure that the identity of the whistleblower, the persons targeted by the latter and the information gathered by all the recipients of the alert remain strictly confidential.

58. This confidentiality is guaranteed when the alert is raised and communicated, during exchanges after the alert has been raised and during processing of the alert by the POC and the persons who need to know about the alert.

### **10.1 Confidentiality and protection of the whistleblower**

59. The identity of the whistleblower is kept confidential when the alert is raised, during subsequent exchanges and during processing of the alert by the POC and the persons who need to know about the alert. Their identity may only be disclosed if required by the law or regulations.

60. The whistleblower's consent is required to disclose information that can identify the whistleblower to persons other than those who need to know, the POC and the judicial authorities.

61. When exercising their rights under GDPR (*General Data Protection Regulation*), the person targeted in the alert may not under any circumstances gain access to information on the identity of the whistleblower.

62. To ensure that the confidentiality measures implemented by Carrefour Group are effective, the whistleblower is advised to be extremely vigilant when using communication channels, and as far as possible to prioritise use of the dedicated ethics line.

### **10.2 Confidentiality of persons targeted in the alert**

63. Respect the confidentiality of the data relating to the person implicated in an alert. Apart from the persons who need to know this information, it may only be disclosed to the judicial authorities, after it has been established that the alert is justified;

64. After recording the data on the person targeted in the alert, the POC will notify them of the facts of which they stand accused, the departments or persons receiving notice of the alert, and their rights.

65. Notification of the person targeted in the alert will not be provided however until the necessary protective measures have been implemented, notably to prevent the destruction of evidence crucial to processing the alert.

### **10.3 Confidentiality of content of the alert**

66. Confidentiality of information is guaranteed at each stage of the whistleblowing process: information gathering, communication and storage.

67. Access to the content of the alert is done using an identifier and a password, regularly renewed with a traceability of connections.

68. The whistleblower raising the alert undertakes to keep confidential all information and documentation relating to the alert and the facts stated therein.

69. The identifiers provided to the whistleblower are strictly confidential. It is therefore the responsibility of the whistleblower to take all the necessary steps to keep their identifiers fully secure.

70. The POC may only make the content of an alert known to persons whose involvement is strictly necessary for the purposes of processing said alert.

71. The persons informed are, in turn, subject to a strict non-disclosure agreement in relation to the information received by them in connection with the processing of the alert.

72. The following security and confidentiality measures will be implemented when processing alerts:

- a regularly changed personal identifier and password, or any other means of authentication;
- data encryption;
- non-disclosure agreements signed by data recipients.

## 11. Personal data protection

73. Carrefour Management, the data controller, processes personal data for the purpose of managing and monitoring the whistleblowing system.

74. For the purposes of this processing, Carrefour Management has committed to comply with Decision no. 2017-191 of 22 June 2017 on single authorisation of the automated processing of personal data in the context of whistleblowing systems (AU-004).

75. Data gathering is limited to information that is strictly necessary for effective use of the whistleblowing system. This information is mandatory and no action can be taken on the alert unless it has been provided.

76. This data is intended for authorised persons in Carrefour Group, subject to their authorisations, and the Group's sub-contractors and service providers, if any.

77. When processing an alert, personal data may be transferred from France to a country outside the European Union to persons assigned to process the alert. Transfers to countries outside the European Union that have not received an adequacy decision from the European authorities will be made under personal data transfer agreements containing European Commission standard contractual clauses.

78. Data will be stored for the periods and in accordance with the terms and conditions specified above.

79. The legal basis for processing is compliance with the statutory obligations binding Carrefour Group, and in particular Law no. 2016-1691 of 9 December 2016 on Transparency, the Fight against Corruption and the Modernisation of Economic Life.

80. As data subjects, both the whistleblower and the person targeted in the alert have a right to question, access, correct, erase, limit and object to all their personal data in the context of this processing. They also have the right to issue general or specific instructions on the retention, deletion and communication of their data post-mortem. These rights may be exercised by emailing the website [carrefourethicsline@carrefour.com](mailto:carrefourethicsline@carrefour.com), attaching a copy of an identity document.

81. You also have a right to complain to the national data protection authority.