

CHARTER FOR THE PROCESSING OF ETHICS AND COMPLIANCE-RELATED ALERTS




Access to this document

PUBLIC DOCUMENT

The document is accessible to any staff member of Groupe ADP from the Group's whistleblowing platform.

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Preamble

The whistleblowing system is part of the Ethics and Compliance program introduced by the Aéroports de Paris Group and described in the Aéroports de Paris Internal Rules. The notions of Ethics and Compliance require the adoption of behaviour compliant with the different laws, regulations, internal rules, and more generally the values of the Group.

This system helps protect staff members and the company alike against human, financial, legal, and reputation-related risks while working together to defend the common good.

Its purpose is to receive alerts submitted by any staff members of the Aéroports de Paris Group and also from the Group's suppliers and service providers.

These alerts may concern violations of the law or a failure to observe the provisions of the internal rules of companies in the Group or their equivalent and, more generally, any failings vis-a-vis fundamental freedoms and human rights, the environment, or occupational safety.

The whistleblowing system was introduced based on the following regulations:

- French laws, including in particular law number 2016-1691 of 9 December 2016 concerning transparency, the fight against corruption, and the modernization of economic life, also known as the "Sapin II Law" (which defines the status of the whistleblower) and law number 2017-399 of 27 March 2017 concerning the duty of care on the part of parent companies and client companies.
- All laws of the countries in which the system will be deployed.


In addition to accessibility, trust and confidence are also prerequisites for the whistleblowing system to be effective and for it to be used by staff. For this, it relies on 4 pillars:

- Protecting the person who sent the alert if they acted in good faith;
- Presumption of innocence of anyone targeted by an alert;
- The good conduct of the parties involved in the reception and processing of the alert;
- Respecting the confidentiality of persons and facts.

Any attempt to hinder or prevent someone from exercising their right to launch an alert is a criminal offense (which can result in up to a year's imprisonment and a fine of €15,000).

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It should be remembered that in the application of the Sapin II law, should the person receiving the alert fail to verify the admissibility of the said alert within a reasonable period, it may then be submitted to the judicial authorities, the administrative authorities, or the relevant professional bodies. As a last resort, should the alert not be processed by these organizations for a period of three months, it may then be made public.

The alert may also be directly made public or sent to the judicial authorities in the event of serious and imminent danger or the risk of irreversible harm or damage.

The level of trust and confidence in the system will be measured at least every year by means of a *Baromètre du Climat Éthique* (Ethical Climate Survey).

This charter describes the system, the protection, and the processing deployed from the moment an alert is received.

1) How should the whistleblowing system be used?

a. Defining the whistleblowing system

The whistleblowing system introduced in response to the above **provides an additional channel for expression** alongside the dialogue with managers and the appointed contacts in the Ethics and Compliance program within the subsidiaries (see Appendix 1).

It is available to all staff, suppliers, and service providers of Groupe ADP, enabling them to:


- Submit a request or question concerning Ethics or Compliance or receive help when questions arise or concerning a delicate situation,
- Report any facts concerning one of the fields falling within its scope (see below) ("alert").

b. Persons involved in the whistleblowing system

The system is underpinned by the Group Ethics Division, i.e. the Group Ethics Director and her deputy.

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If necessary, they can draw on specially designated persons (details of Contact persons can be found in Appendix 1) to address Ethical & Compliance issues for the area concerning them:

- ⇒ An internal investigator is attached to the Group Audit Division to guarantee its independence.
- ⇒ ADP Ingénierie: 1 Ethics and Compliance Contact
- ⇒ HUBONE: 1 Ethics and Compliance Contact
- ⇒ AIG: 1 Ethics and Compliance Contact
- ⇒ TAV: 1 Ethics and Compliance Contact

Finally, an ad hoc Processing Committee (see section 5) will be set up for each alert by the Ethics Division. It will bring together a limited number of people considered as having the skills and expertise necessary for the subject to be addressed (finance, legal, HR, etc.).

b. Using the whistleblowing system

The use of the whistleblowing system is **a right that the people concerned may exercise freely**. The decision not to use the system cannot lead to any sanction.

Various channels exist to contact the people responsible for Ethical and Compliance issues: direct contact, telephone, post, whistleblowing platform (<https://alert.groupeadp.fr>). Irrespective of the channel used, the request must be formalized by the Ethics Division via the dedicated whistleblowing platform. This should be the preferred channel, with the aim of protecting both the whistleblower and the confidential nature of the information conveyed.


It is a channel of last resort: as a priority, the employee should contact their line manager or manager, or their HR manager when the situation permits.

In summary:

- ⇒ To deal with a difficult situation when possible:
 - Line manager or manager,
 - HR manager.
- ⇒ To submit a request or receive help when the first channel is not possible:
 - The Groupe ADP Ethics Director and her deputy,
 - The Ethics and Compliance Contacts at the level of each of the subsidiaries (see Appendix 1).

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⇒ To issue an alert:

- A platform is accessible 24/7(<https://alert.groupeadp.fr>) in the local language of the country in which the Aéroports de Paris Group operates.

Only the Ethics Director and her deputy are authorized to access all the alerts on the whistleblowing platform. In certain cases and at their initiative, they may give certain access to Ethics and Compliance Contacts for the scope concerning them, the Groupe ADP investigator, and/or members of the processing committee (see section 5). The Ethics Division is supported by a service provider who has signed a confidentiality undertaking in certain screenings of alerts and the systematic and anonymization of documents at the end of the processing of the alert.


d. The whistleblowing system's scope

Alerts may concern:

- A crime (for example aggravated theft, rape, terrorism) or another offense (tax fraud, falsification of accounts, corruption, misuse of company assets, breach of trust, illegal acquisition of interests, influence-peddling, malicious phone calls, or sending malicious messages, threats, sexual harassment or workplace bullying, discrimination of any kind, extortion, blackmail, fraud, illegal use of public funds),
- A violation of an international commitment,
- A violation of a law or regulation,
- A failure to comply with the Ethics and Compliance Code (including only obligations aimed at prohibiting any act contrary to legal obligations and acts of corruption or influence-peddling) appended to the Internal Rules or its equivalent in the subsidiaries whose key principles are reiterated below:
 - Compliance with laws and regulations
 - Combating fraudulent behavior
 - Prevention of corruption
 - Prevention of influence-peddling
 - Gifts, invitations, and other benefits
 - Conflicts of interest

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- Respecting the principles of loyalty, fairness, and integrity
- Protection of information and personal data
- Compliance with environmental protection measures

These principles

- Threats to or serious risks for the general good. For example, serious violations of human rights and fundamental freedoms, and serious harm to the health and safety of persons and the environment.

2) Commitments of persons involved in the whistleblowing system

For the implementation of the whistleblowing system, the Ethics Division, the Ethics and Compliance Contacts, the internal investigator, and the members of the Processing Committee will observe the following commitments when performing their duties:

- Act **efficiently**, ensuring that they display **neutrality and impartiality** at all times,
- **Give careful consideration to all alerts or requests** falling within the scope of the whistleblowing system,
- **Be responsive** when it comes to acknowledging the alert and processing it,
- **Inform** the person submitting the alert of the state of progress with its processing while also ensuring strict compliance with confidentiality rules,
- **Protect** the parties involved, following the rules described below, **and in particular protect the confidential nature of the whistleblower's identity and the information concerned**.


They all sign a confidentiality undertaking reminding them of their obligations and the associated sanctions. The processing committee (see section 5) consists only of the persons strictly necessary to process the alert. The processing committee does not have access to the whistleblower's identity, except where required for the processing, for example, in certain HR cases.

3) Protecting the parties involved: rights and obligations

a. General protection rules

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- Nobody may be prosecuted, sanctioned, dismissed, or be subjected to discrimination, either directly or indirectly, for instance concerning remuneration, training, redeployment, assignment, qualification, classification, professional promotion, transfer, or, contract renewal, for having exercised their right to report a matter in good faith (even if the facts reported subsequently prove to be inaccurate or give rise to no further action).
- The person issuing the alert agrees to inform the Ethics and Compliance team or the Contacts if any other person or body is processing or has processed this same request.
- To avoid abuses of the system, the requests may not be anonymous, and the submitter's name must be clearly shown. Only a single exception applies when the factual information is sufficiently detailed and the serious nature of the facts has been established. In this case, the alert will be processed in a conventional manner. Apart from this one exception, anonymous requests will be ruled inadmissible.
- To benefit from the protection accorded to whistleblowers, the person submitting the alert must:
 - **Be acting selflessly** (in contrast to a paid informer or someone motivated by vengeance or personal gain),
 - **Be acting in good faith** (they must reasonably believe that the facts reported are true at the time they report them),
 - **And have personal knowledge of the facts:** have been the witness of actions, recipient of information, etc., as opposed to mere rumors,
 - **Preserve the confidential nature of the alert submitted using this system.**
- Any abusive use of the whistleblowing system (for example: for malicious accusations or defamation) will result in action and disciplinary proceedings being taken against the offender.

b. Protection for whistleblowers

All necessary precautions are taken by persons involved in the whistleblowing system to ensure that any information likely to identify whistleblowers either when receiving

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the alert or processing it remains strictly private and confidential. This information includes among others the identity of the person initiating the alert, their job, or their contact details.

It must be remembered that the whistleblower's identity may only be supplied to the judicial authorities with his consent.

When it becomes necessary to involve third parties in the processing of the alert, the Ethics Division must ensure that these third parties are bound by stringent confidentiality obligations concerning the above-mentioned information.

The whistleblower may contact the Ethics Division via the platform if he or she feels themselves to be the victim of reprisals, to report this.

Any confidentiality breach (identity, information, etc.) by persons involved in the whistleblowing system or any person authorized to process the alert may result in disciplinary and criminal proceedings (under the Sapin II law), this being punishable by 2 years imprisonment and a fine of €30,000. As a reminder, these persons have signed a deed of commitment.

c. Protection for the persons targeted by an alert

All necessary precautions are also taken by persons involved in the whistleblowing system to ensure that any information likely to identify the persons targeted by an alert (identity, job, contact details) remains strictly private and confidential.

It should be remembered that the identity of the person accused by an alert may only be disclosed to the judicial authorities once it has been established that the alert is justified.


When it becomes necessary to involve third parties in the processing of the alert, the Ethics Division will only supply the information strictly necessary and must ensure that these third parties are bound by stringent confidentiality obligations concerning the above-mentioned information.

To enable any person targeted by an alert to be informed of the processing of their personal data and to be able to exercise their rights (see point below), the Ethics Division or internal investigator must inform them of the facts alleged against them, within a reasonable period that cannot exceed one month following the issue of the alert.

However, if such information is likely to seriously compromise the investigation process (for example, in the presence of a risk that proof will be destroyed), then this

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information may be deferred and will only be provided once any risk has been removed. If precautionary measures must be taken, the processing committee (see section 5) will decide on the proportionality and the need for such measures.

In all cases, any information like identifying the whistleblower must never be supplied.

d. Processing of personal data

The system for reporting and processing work-related alerts described in this charter involves personal data processing operations for which Aéroports de Paris SA acts as a data controller.

- Purpose and legal basis

The purpose of these processing operations is to enable the reception and management of questions and alerts received.

They are based on legal obligations imposed on Aéroports de Paris SA.

The data collected and retained are stored in a secure manner in accordance with the GDPR and the whistleblowing system is recorded in Groupe ADP's register of processing activities.

- Data collected and processed

Whistleblowers are reminded that they must only communicate factual information having a direct link with the subject of their alert in the whistleblowing system.


The following personal data are processed concerning the whistleblowing system:

- The whistleblower's identity, job and contact details,
- The identity, job, and contact details of the person targeted by the alert,
- The identity, job, and contact details of the persons involved in the reception and processing of the alert, notably witnesses,
- Facts reported,
- Information collected concerning the verification of facts reported,
- Reports of investigation/verification operations,
- Further action on alerts.

- Data retention period

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When the alert is declared inadmissible (see below), this data will immediately be deleted or archived after anonymization under the responsibility of the Ethics Division.

When the alert is admissible but no further action is taken, the personal data collected related to this alert are destroyed or archived after anonymization on the whistleblowing platform for statistical analysis purposes under the responsibility of the Ethics Division (stéphanie.SCOUPPE@adp.fr or Isabelle.CHIESA@adp.fr) after a maximum period of 2 months from the closure of the dossier.

When disciplinary or legal proceedings are initiated against the accused person or against the initiator of a malicious alert, the data concerning the alert will be stored by the Ethics Division until the end of the proceedings (see point 5.d) and the limitation period for appeals against the decision, via the whistleblowing platform. If the failures relate to a law having a limitation period then the material from the investigation will be archived to be able to respond to the authorities in the event of an investigation.

If required by the regulations or when this is necessary to protect the whistleblower or prevent litigation, the data may be archived for a longer period in a secure separate storage location from the whistleblowing platform in compliance with the legal retention periods. Only the Ethics Division (stéphanie.SCOUPPE@adp.fr or Isabelle.CHIESA@adp.fr) and the investigation team in charge of the dossier have access to data stored in a secure location.

- Recipients and data transfers

Personal data may be communicated to third-party service providers when necessary for the processing of the alert (reception of alerts, screening, investigation, legal expertise). These service providers sign contracts with Aéroports de Paris SA in which they undertake to take sufficient guarantees concerning the processing and security of data entrusted to them.


Personal data are likely to be transferred outside the European Economic Area. In this case, Aéroports de Paris SA puts in place guarantees to ensure a sufficient level of data protection, notably through the signature of the European Commission's standard contractual clauses (a copy of which is available on request at informatique.libertes@adp.fr).

- Rights of individuals

As indicated previously, any person who is the subject of an alert will be informed within a reasonable period, except when such information is likely to compromise the

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needs of the investigation. In this case, the information will be deferred and issued as soon as the risk for the investigation has been removed.


In accordance with applicable legislation in terms of personal data protection, persons identified with regard to the whistleblowing system have a number of rights concerning the collection and processing of their personal data, i.e.:

- Right of access: individuals have the right to obtain (i) confirmation that personal data concerning them have or have not been processed and, when they have been processed, to obtain (ii) access to the said data and a copy of these data. However, exercising this right must not violate the rights and freedoms of third parties or prevent the smooth operation of the investigation.
- Right of objection: When processing is carried out to enable Aéroports de Paris SA to comply with a legal obligation (for example, the Sapin II Law) then the right to object is not applicable.
- Right of rectification: individuals have the right to obtain the rectification of inaccurate personal data concerning them. They also have the right to have incomplete personal data completed, including by providing a supplementary statement. However, this right must not enable the person concerned to retroactively modify the information contained in the alert or collected during its investigation.
- Right to erasure: in certain cases, individuals have the right to have their personal data erased. However, this is not an absolute right and Aéroports de Paris SA may have legal or legitimate reasons to retain the said data.
- Right to restrict processing: in certain cases, individuals have the right to restrict the processing of their personal data.
- The right to transmit instructions concerning the use of data after death: individuals may give Aéroports de Paris SA instructions concerning the use of their personal data after their death.

These rights may be exercised by contacting the Ethics Division (isabelle.chiesa@adp.fr or stephanie.scouppe@adp.fr) or the Data Protection Officer:

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- By e-mail: informatique.libertes@adp.fr
- By post: Délégué à la protection des données (data protection officer)

1 rue de France

BP 81007

95931 Roissy Charles de Gaulle Cedex

If, after contacting the Data Protection Officer, the persons concerned consider that their rights have not been respected, they may make a complaint to the data protection authority.

4) Alert reception procedure

a. Acknowledging receipt of an alert by e-mail or via the platform

An acknowledgment of receipt (see Appendix 2) makes it possible to inform the whistleblower that the alert has been received by the Ethics Division.

It is sent within **a maximum of 48 hours** by the Ethics Division via the whistleblowing platform or by e-mail and informs the whistleblower that its admissibility will now be examined using the procedure described below.

b. Examining the admissibility of an alert

The admissibility of each alert will be assessed by the Ethics Division which may, if necessary, refer to the service provider selected to handle the screening of the alerts.


The whistleblower must be a staff member (permanent or non-permanent, on a fixed-term or open-ended contract, a temp or an intern) or an external or occasional collaborator (service provider or direct subcontractor of Groupe ADP).

The admissibility of the alert is also based on the following criteria:

- The plausibility of the facts reported,
- The detailed nature of the facts reported, or the items of proof provided,

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- Compliance with the principles contained in:
 - The scope of the whistleblowing system as defined in Article 1.d);
 - The criteria defined in Article 3. a.

Within a period of **one month** from the sending of the acknowledgment of receipt of the alert, the Ethics Division will inform the whistleblower of the admissibility of the alert with regard to the alert procedure as described in this charter (see Appendix 3). If it has not been possible to establish the admissibility of the alert within a period of one month, the Ethics Division informs the whistleblower that the alert is still being examined. The response regarding the admissibility of the alert cannot exceed a total of two months.

When it is clear that the alert does not fall within the scope of this system, this information may be stated directly in the acknowledgment of receipt.

5) Alert processing procedure

a. Creation of an *ad hoc* committee by the Ethics Division

The first stage of processing relies on the Ethics Division which analyses the information collected and requests additional information from the whistleblower if necessary:

- Identification of any previous or parallel processing of the matter. For example, measures already implemented by the HR network with regard to discontent in the workplace,
- A detailed description of the facts,
- The identification of any possible risks.

After this first stage, the Ethics Division will set up an *ad hoc* Processing Committee bringing together a limited number of people considered as having the skills and expertise necessary for the subject to be addressed (finance, legal, HR, etc.), which will investigate the facts, subject of the alert.


The Committee meets as often as necessary to approve the processing strategy, oversee the investigation process and share any difficulties.

If the Committee conducts an investigation, it will share its first report which will constitute the investigation team's assignment order comprising the allegations, questions, details of the alert, scope of the investigation, etc.

As a guide, the following could participate in the processing committee:

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	Ethics Division supported by the Ethics and Compliance Contact of the entity if necessary	Representative of the Human Resources Division	Legal Affairs Director Or Corporate Lawyer	HR Lawyer	E&C Investigator	DHA Representative
Corruption	X		X		X	X
Psychological harassment Malaise	X	X	X	X	X	
Conflict of interest	X	X		X	X	

b. Investigating the facts concerned by the alert

According to the nature and seriousness of the facts reported by the whistleblower, the ad hoc Processing Committee may decide that:

- The alert requires an internal investigation performed by persons designated internally to be conducted:
 - For “simple” verifications: Ethics Division, Ethics, and Compliance Contact,
 - For investigations: Groupe ADP’s internal investigator,
 - For facts requiring independence of particular expertise: external service provider (law firm, forensic firm, etc.).

At the end of the investigation, the Ethics Division may issue a recommendation based on the conclusions of the investigation. These recommendations may relate to the case or the operation.


- The alert requires the implementation of precautionary measures.
- The alert requires the performance of an internal or external audit.

The investigations, whether conducted internally or externally, are subject to the rules contained in the document relating to the ethics of the internal investigation (see Appendix 4) and to the following three fundamental principles:

- Professionalism,
- Respect for confidentiality,
- Objectivity.

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In addition, if the alert presents confirmed or anticipated **psychosocial risks**, the Ethics Division alerts the relevant bodies in the Group (company doctor, the manager responsible for the quality work lifeline, etc.) to ensure that this risk is dealt with while continuing with the processing of the alert received.

In all circumstances, all of the people involved in the investigation of the alert are bound by heightened confidentiality obligations.

In all cases:

The **Ethics Division remains responsible for the processing of the alert and maintains a privileged relationship with the whistleblower.**

Although the investigations and audits performed following an alert may have serious professional or personal implications for the persons accused **they may not under any circumstances be considered equivalent to a judicial inquiry or criminal investigation.** Upon completion of the investigation, the ad hoc committee may forward the case to the judicial authorities for them to pursue it, in the event that the alert has demonstrated the existence of a criminal offense.

c. Particular case of professional malaise/harassment

Alerts reporting cases of malaise or harassment are processed in the same way as other alerts. However, certain precautions are taken given the substantial psychosocial risks that may result.


The following principles apply:

- As a precautionary measure, the Ethics Division may defer providing information to the manager and the employee accused by the alert in accordance with the opinion of the processing committee.
- The Ethics Division may take the necessary precautionary measures, (without presuming the responsibility of each of the parties) in collaboration with the HR Division in order to protect the whistleblower and/or the person targeted by the alert.

d. c. Closure of the alert processing procedure

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The decision to end all operations relating to the processing of the alert will be taken **by the ad hoc processing committee.**

The whistleblower and the person targeted by the whistleblower are informed by the Ethics Division that the alert processing procedure has ended.

At the end of the processing, the Ethics Division may issue a recommendation which, based on the conclusions of the investigation, may relate to:

- The case processed,
- The operation (organization, process, etc.).


The recommendation is issued to the relevant persons having to take decisions pertaining to this recommendation in accordance with the opinion of the processing committee. The transmission of this recommendation represents the end of the investigation and therefore the closure of the procedure.

d. Activity report concerning alerts

Each year, the Ethics Division produces a report on the actions implemented, by the Audit Committee, and on the risks, for the Board of Directors and the Executive Committee. In doing so, they review the whistleblowing system via a statistical monitoring table containing anonymized information without personal data. The Ethics Division completes the monitoring table concerning the state of progress with the cases in order to identify any ethical matters requiring the introduction of preventive or corrective measures.

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APPENDICES

Appendix 1: The Ethics and Compliance network at Groupe ADP

At the Groupe ADP level and at Aéroports de Paris SA:

Stéphanie Scoupe Ethics Director	E-mail: stephanie.scoupe@adp.fr
Isabelle Chiesa, Deputy Ethics Director	E-mail: isabelle.chiesa@adp.fr
Loïc Aubouin Legal Affairs Director	E-mail: loic.aubouin@adp.fr

At Airport International Group (AIG) - Amman - Jordan Airport:

Hazem Khirfan Legal and compliance director/Directeur Juridique et Compliance AIG	E-mail: Hazem.Khirfan@aig.aero
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At TAV Airports:


Can Alptekin Head of Audit	E-mail: Can.Alptekin@tav.aero
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At Hub One:

Olivier Mellina-Gottardo, Secretary-General/Compliance Officer	E-mail: olivier.mellina-gottardo@hubone.fr
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Appendix 2: Standard acknowledgment of receipt of the request/alert (with the 10 rules) containing no information regarding its admissibility

Dear Sir or Madam,

I acknowledge receipt of your request/alert and I would be grateful if you could let me know if you have already contacted another person concerning this same matter or used another procedure.

The admissibility of your request/alert with regard to the criteria defined in Article 4. b of the Charter on the processing of ethics and compliance alerts ([available on the website https://www.parisaeroport.fr/groupe/rse/ethique-et-compliance/systeme-alerte](https://www.parisaeroport.fr/groupe/rse/ethique-et-compliance/systeme-alerte)) will be examined. The whistleblowing system is mentioned in the Code of Ethics attached as an appendix to the ADP SA Internal Rules and in the Code of Conduct. Additionally, I would like to invite you to familiarise yourself with the 10 rules applicable to this system (please see below).


You will be notified of the results of this examination via the whistleblowing platform or by e-mail within a period of one month from the date of this acknowledgment of receipt.

If your alert is not admissible, you will be informed at the end of this examination. Where the alert is considered admissible, you will be informed of the action taken upon completion of the alert process.

[Formal letter ending]

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10 rules that apply to the whistleblowing system

- 1) The whistleblowing system was set up in accordance with laws and regulations and is provided for in the Code of Ethics in an appendix to the internal rules of ADP SA, as well as the International code of conduct and worldwide compliance program of ADP;
- 2) The use of the whistleblowing system is not an obligation. It is a right that the people concerned may exercise freely;
- 3) Alerts cannot be treated anonymously unless the facts reported are sufficiently detailed and their severity has been established.
- 4) A specific organizational system has been set up to receive and process alerts. The Ethics and Compliance Contacts in charge of the system are subject to a strict duty of confidentiality with regard to the information they receive. Any breach of confidentiality will be subject to criminal prosecution (up to 2 years imprisonment and a EUR 30,000 fine).
- 5) The Ethics and Compliance Contacts in charge of processing the alert will acknowledge receipt within two days of receiving it and will decide on its admissibility within one month;
- 6) The person who sent the alert will not be exposed to any sanction for using the system in good faith, and the information they give will remain confidential throughout the process, except for express prior agreement to the contrary.
- 7) Nobody may be prosecuted, sanctioned, dismissed, or be subjected to discrimination, either directly or indirectly, for instance with regard to remuneration, training, redeployment, assignment, qualification, classification, professional promotion, transfer, or contract renewal, for having exercised their right to report a matter in good faith;
- 8) An intentionally false alert or an alert that reveals a collusion between the person issuing the alert and the person in question, maybe sanctioned in accordance with internal rules;
- 9) The whistleblowing system complies with laws and regulations and with the French data protection law of 6 January 1978 as well as Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, the General Data Protection Regulation (GDPR).
- 10) Users of the system and any person targeted by the system benefit, within the limits of the applicable legislation, from several rights regarding their personal data (right to access, modify, erase, right to object, restrict processing and right with regard to the transmission of post-mortem instructions) that they may exercise by contacting the Ethics Division (isabelle.chiesa@adp.fr or stephanie.scoupe@adp.fr) or the Data Protection Officer:
 - by e-mail: informatique.libertes@adp.fr
 - by post: 1 rue de France BP 81007 95931 Roissy Charles de Gaulle Cedex

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Appendix 3: Information on the admissibility of alerts

Dear Sir or Madam,

I have carefully studied your alert. According to the criteria defined in Article 4.d of the Charter for the processing of ethics and compliance alerts that is available on http://portail/sites/ethique_et_compliance_and_the_website_and_international_site, I hereby inform you that your alert:

- Is admissible and will be processed as quickly as possible. You will be kept updated on the processing of your alert via the platform or by e-mail. You will be informed of the follow-up on your alert once the process has been completed.

Or


- Cannot be processed within the scope of this whistleblowing system. The data collected on the occasion of your report will be deleted as soon as possible or will be rendered anonymous to archive, in accordance with Article 3.d of the aforementioned Charter.

Your alert will be treated as strictly confidential.

[Formal letter ending]

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Appendix 4: Ethics of the internal investigation

In accordance with Article 5.b. of the Charter on the processing of ethics and compliance alerts, the ad hoc Processing Committee set up by the Ethics Division may decide to conduct an internal investigation to investigate the alert received with regard to the system put in place by Groupe ADP.

The purpose of this document is to specify the general principles governing internal investigations and applicable to the persons designated by the ad hoc Processing Committee to perform them, as well as to describe how these investigations are conducted.

The rules contained in this document will also apply to the third-party auditors or investigators appointed by the Ethics Division after consulting the Processing Committee.

General principles governing internal investigations

Article I

The internal investigation performed in order to investigate an alert must not be considered as being equivalent to a criminal investigation.

The people in charge of the internal investigation act in strict compliance with the applicable laws and regulations and with the company's rules, with which they must ensure that they are fully familiar at all times.

Article II

The internal investigation focuses on criminal acts or those presumed as such or a violation of the internal rules, or equivalent, or the codes of conduct revealed by the alert, and not on people.


Its purpose is to verify the reality of the facts concerned by the alert, where necessary, to identify the presumed perpetrators, and to collect the information required to initiate disciplinary and possibly legal proceedings.

Article III

During their investigations and when reporting back on their work, the persons in charge of the internal investigation must observe the following principles: integrity, objectivity, impartiality, confidentiality, and professionalism.

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When necessary, the persons in charge of the internal investigation must withdraw from it when they consider that a conflict of interest exists due to their particular relationship with one of the people concerned by the investigation, or their involvement in the project concerned.

Article IV

The privacy and rights of individuals are respected throughout the internal investigation.

The investigator will not use or divulge any information gathered during his activities, directly or indirectly, on his own behalf or for the benefit of a third party.

The internal investigation will not seek to discover or divulge information concerning the personal, family, or medical circumstances of a staff member.

It respects the declaration of this processing in the Group's register of processing activities.

Conducting an internal investigation

Article V

The internal investigation will be conducted impartially, examining all incriminating and exonerating facts, by at least two people, in strict compliance with the presumption of innocence of the persons concerned.

The investigations are carried out based on factual and objective proof, disregarding any convictions, personal impressions or rumors, and any value judgments.

Article VI

The persons in charge of the internal investigation must notify the people they meet and/or interview of this fact (see below).


In application of the heightened confidentiality obligations incumbent upon them during the processing of the alert, they are not required to provide any clarification or other information concerning the circumstances of their requests.

Article VII

The people in charge of the internal investigation have access to Groupe ADP's sites and entities, and to any information or information system which they need to consult in order to perform the mission assigned to them, except for information covered by national defense secrecy obligations.

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For access to the information systems, the procedure and referral conditions established by the audit division must be strictly respected.

They may demand a copy of any documents considered useful to the investigation.

Article VIII

When required, the persons in charge of the internal investigation may interview people (witnesses, people targeted by the alert, or any other person considered useful) to obtain their explanations for the facts concerned by the alert.

During these interviews, no pressure, threats, or intimidation may be used against the interviewees.

The interviews are conducted by two people and will always result in an interview report drafted by the persons participating in the interview.

Article IX

All actions performed during the internal investigation resulting in the gathering of proof must comply with strict rules intended to ensure the protection of the persons concerned by the investigation (including in particular the anonymization of appointments in diaries and the use of a safe to store the items and information collected).

Notification of findings

Article X


The findings from the internal investigation will be the subject of a report which should be drafted in such a way as to ensure that it does not contain any information likely to identify the whistleblower.

This report must be approved by the ad hoc Processing Committee set up by the Ethics and Compliance team. It may be circulated to any person considered necessary by the ad hoc committee in view of the subsequent action to be taken regarding the alert.

If the results of the internal investigation have made it possible to refute the facts stated in the alerts, all of the information and data collected must be deleted in compliance with Article 5.c. of the Charter for the processing of ethics and compliance-related alerts.

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Appendix 5: Instructions for controlling information system used in the event of concerns regarding compliance with ethical rules and good information security practices

Please refer to the internal procedure shown on the intranet site: http://portail/sites/ethique_et_compliance or available upon request from the Group Ethics Division (stephanie.scouppe@adp.fr).

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