

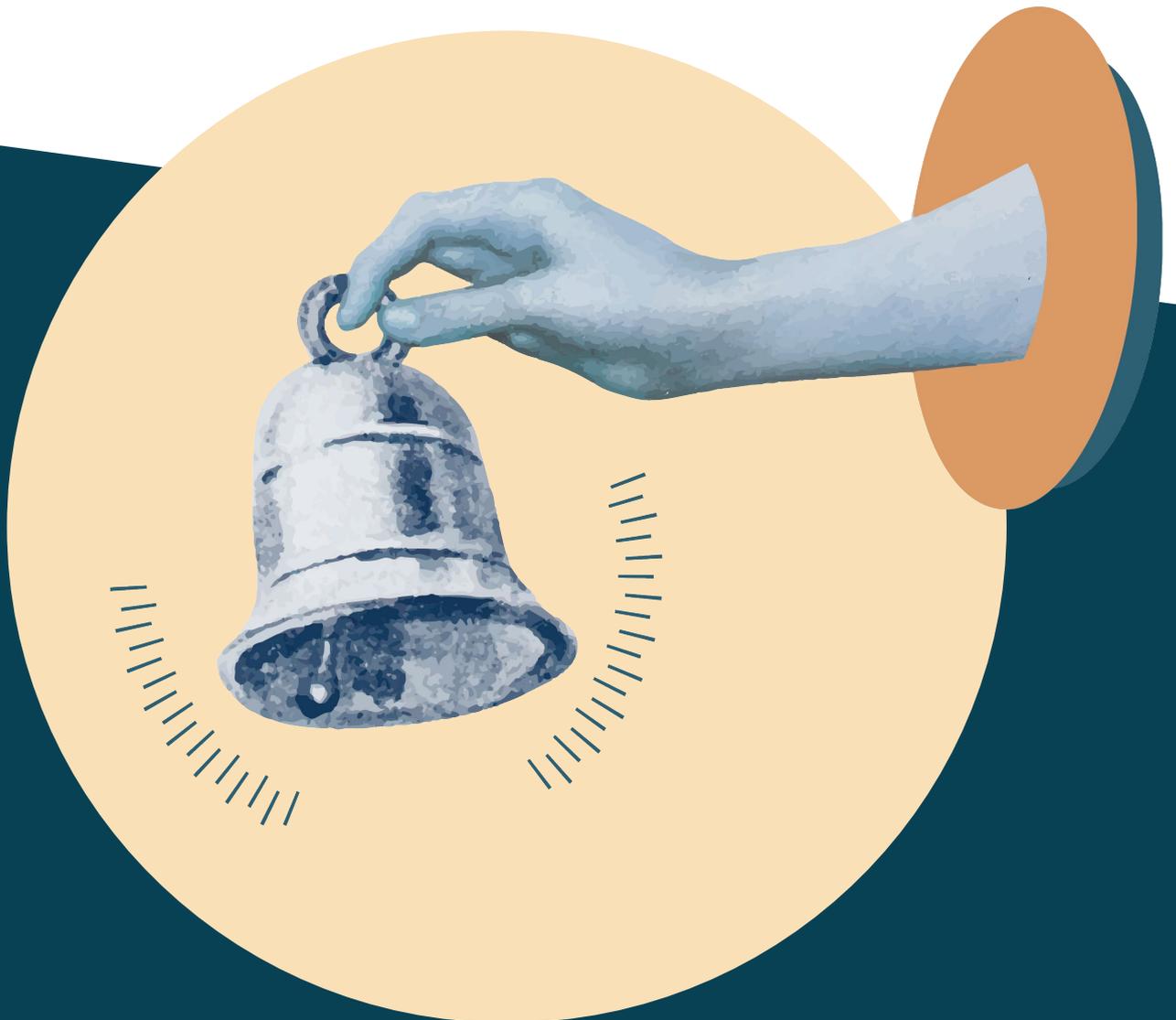
Groupe

**Pierre & Vacances**  
*CenterParcs*

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# WHISTLEBLOWER CHARTER

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# PREAMBLE

The Pierre & Vacances-Center Parcs Group is committed to developing a culture where everyone can legitimately and safely question what is happening within the Group.

One of the aims of our Whistleblowers' Charter is to enable Group employees to express their concerns in complete confidence and without fear of reprisals. We recognise that employees are often the first to identify inappropriate behaviour or actions within the Group. We therefore want them to feel confident and free to express any concerns.

All employees of the PVCP Group are invited to communicate directly with their line manager, the Group Compliance Officer or their Human Resources Department, by whatever means they consider most appropriate: a personal interview, letter, e-mail or telephone call.

However, if employees feel that it is not possible or efficient to use the above-mentioned contacts, they can also report a serious incident via an online platform managed by an external service provider.

The use of the internal alert system covered by the Charter remains optional and the absence of an alert will therefore have no particular consequences for the employee.

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# SCOPE OF APPLICATION OF THE WARNING SYSTEM

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In practice, such reports may relate to corruption, influence peddling, discrimination, harassment, anti-competitive practices, stock market, financial and accounting offences, etc.

The purpose of the PVCP internal alert system is to receive reports on :

- conduct or situations contrary to the company's **code of conduct** <sup>1</sup> ;
- a **felony** or **misdemeanour** ;
- a violation or attempted concealment of a violation of the law or regulations ;
- a violation or attempted concealment of a violation of an international commitment duly ratified or approved by France ;
- a violation or attempted concealment of a violation of a unilateral act of an international organisation taken on the basis of an international commitment duly ratified or approved by France ;
- a threat or **harm to the general interest** ;
- serious infringements (or risks of serious infringements) of human rights and fundamental freedoms, **the health and safety of individuals** and the environment that may result from the activity of the PVCP Group or **of suppliers or subcontractors** of the PVCP Group in the context of their relations.

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Reports relating to any other subject, such as conflicts or personal claims, will not be taken into account by the people in charge of handling alerts, who will ask the employee to contact the appropriate people within the company.

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<sup>1</sup> Code of Conduct means the March 2019 Code of Ethics and any code of conduct subsequently adopted by the Company on the prevention of corruption.

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# WHO CAN ISSUE AN ALERT?

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**Only a natural person acting in good faith can issue an alert.**

The internal whistleblowing system is **open to all** regular or occasional **employees** of the PVCP Group, whatever **their status or hierarchical level: employees** on permanent or fixed-term contracts, apprentices, trainees, temporary staff, former employees and job applicants when the information was obtained in the context of a former employment relationship or job application.

**The internal alert platform is also open to employees** of suppliers, partners and stakeholders, shareholders, associates and holders of voting rights at general meetings of the entity concerned and members of administrative, management or supervisory bodies.



## IDENTITY OF THE WHISTLEBLOWER & CONFIDENTIALITY

People who use the whistleblower system are strongly encouraged to identify themselves. The identity of the whistleblower is treated **confidentially** by the organisation or persons responsible for alert management.

By way of exception, an alert from a person who wishes to remain anonymous will be processed under the following conditions:

- **the seriousness of the acts mentioned** is established (for example, acts of corruption, influence peddling or harassment would meet this seriousness criterion);
- the **factual elements** are sufficiently **detailed**;
- a **prior examination** by the first addressee, who considers that it is appropriate for the alert to be disseminated within the framework of the system.

The author of an anonymous alert who has used the alert platform will be notified of the progress of the processing of his alert via the platform under the same conditions as an author who has disclosed his identity.

# HOW TO SEND AN ALERT?

## YOU CAN SEND AN ALERT:



by contacting your **line manager**, your **HR manager** or your **Group Compliance Officer**



by filing an alert on the **internal alert platform**:  
<https://pvcp.whispli.com/fr/alerte>



by contacting the Human Rights Defender  
<https://defenseurdesdroits.fr/>  
or the judicial authority



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# PROTECTION OF WHISTLEBLOWERS

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The pitcher's protective status is guaranteed if the following conditions are met:



the whistleblower is a natural person



the alert is made without direct financial consideration and in good faith<sup>1</sup>



the whistleblower reports or discloses a fact falling within the scope of whistleblowing as defined above

In addition to the whistleblower, the status of whistleblower will also be extended to facilitators (any natural person or any legal entity under private non-profit law who helps a whistleblower to make an internal or external report or a public disclosure), natural persons in contact with a whistleblower who could suffer reprisals or sanctions as a result of the whistleblowing (relatives or colleagues of the whistleblower).

The PVCP Group will not take any reprisals (such as discrimination, change of status, harassment or other) against whistleblowers who meet these conditions, even if the facts subsequently prove to be inaccurate or do not give rise to any further action.

Conversely, a person who makes allegations that he knows to be false cannot be considered to be acting in "good faith". In such cases, they may be subject to disciplinary sanctions and incur the penalties provided by law for slanderous accusations.

<sup>1</sup> The author of the alert has a reasonable belief that the facts are true at the time they are stated.

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# COLLECTION AND PROCESSING OF THE ALERT

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In all cases, the person in charge of managing the alert :



**informs** the author of the alert within **72 hours** that the alert has been received



**assesses the admissibility of the alert** and, if the alert is deemed inadmissible, informs the author of the alert of the reasons why the entity considers that the alert is inadmissible and the action that will be taken.



**provides feedback** to the whistleblower on the handling of his/her alert within a reasonable period of time not exceeding 3 months from the acknowledgement of receipt of the alert or, failing this, 3 months from the expiry of a period of 7 working days following the alert.

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## CONFIDENTIALITY

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The PVCP Group undertakes to implement procedures guaranteeing the **strict confidentiality** of the **identity of the author of the report**, the **facts covered by the report** and the **identity of the persons concerned**, including in the event of communication to third parties.

Indeed, as part of the internal investigation carried out following the alert, if the case so requires, the person in charge of alert management is likely to call on experts, for example lawyers, who will act as subcontractors and with whom guarantees in terms of personal data protection and confidentiality will be taken.

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# PROTECTION OF PERSONAL DATA

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The management of professional alerts is a personal data processing operation implemented by GIE PV-CP Holding Services acting as data controller and which is based on a legal obligation (article 8 III and 17.1 and 17.2 of the SAPIN II law and article L.225-102-4 of the French Commercial Code resulting from the law on duty of care).

## ↘ **A Categories of personal data collected**

Only the following personal data will be processed as part of the management of professional alerts:

- identity, position and contact details of the whistleblower ;
- identity, position and contact details of persons subject to an alert ;
- identity, position and contact details of persons involved in receiving or handling the alert ;
- facts reported by the alert ;
- information gathered in verifying the facts reported ;
- audit report ;
- follow-up to the alert.

Certain sensitive data may also be processed where this is necessary for the establishment, exercise or defence of legal claims.

## ↘ **B Data recipients**

The PVCP Group uses a subcontractor, Whispli, to manage the alerts issued via the alert platform.

The persons specifically responsible for managing alerts will be the Group Compliance Officer and the HR Director/HRD of the Data Controller, whose contact details appear on the Group's intranet. Depending on the nature of the alert, data may also be sent to the Chief Executive Officer, the Chief Financial Officer, the General Counsel or any other employee who needs access to this data as part of an investigation. Access to alert data is forbidden to members of staff who are not authorised to know about it (i.e. people who have not been designated to collect and/or process the alert). When an alert is received by another person or department, it will be forwarded without delay to the persons or departments responsible for managing alerts.



## **C Informing the person who is the subject of an alert**

The persons in charge of alert management will inform the person who is the subject of an alert (for example, as a witness, victim or alleged perpetrator) within a reasonable period of time, which may not exceed one month, following the issue of an alert. They will then inform the person of the allegations made against him or her, but not of the identity of the whistleblower or of any information that would make it possible to identify him or her, as well as the procedures for exercising his or her rights.

However, this information may be withheld if it is likely to "seriously compromise the achievement of the purposes of the processing operation". This could, for example, be the case where disclosure of this information to the person concerned would seriously compromise the needs of the investigation, for example where there is a risk of destroying evidence.



## **D Data retention period**

Data relating to an alert considered by the data controller to fall outside the scope of the system is destroyed immediately or made anonymous.

Data relating to an alert falling within the scope of the system will only be kept for as long as is necessary to deal with the situation in question, and will then be destroyed as soon as it is no longer legally necessary to keep them, and at the latest within two months of the end of the verification operations, except in the case of legal or disciplinary proceedings.

When disciplinary or litigation proceedings are initiated against a person implicated or the perpetrator of an abusive alert, the data relating to the alert may be kept by the organisation responsible for managing alerts until the end of the proceedings or the limitation period for appeals against the decision.



## **E Safety measures implemented**

We guarantee the implementation of the following security measures:

- confidentiality agreement signed by each member of the survey team, data stored on servers located in France;
- https security for exchanges on the Whispli platform;
- ISO 27001 certification for Whispli ;
- Whispli undertakes not to use the data for purposes other than alert management and to return or destroy the personal data at the end of the contract.

In addition, the security and compliance of the internal whistleblowing system with regulations on the protection of personal data were audited by an external service provider.



## F Rights of the persons concerned

Any person whose personal data is being or has been processed in the context of a professional alert (whistleblower, presumed victims of the facts, persons targeted by the alert, witnesses and persons heard during the investigation, etc.), has the right to access it in accordance with the provisions of art. 15 of the RGPD. Exercising this right must not enable the person exercising it to access personal data relating to other natural persons, in particular the identity of the person making the alert.

Data subjects have the following rights:

- right to object to the processing of their data, subject to the conditions for exercising this right in accordance with the provisions of Article 21 of the RGPD ;
- right of access, rectification and deletion of data concerning them<sup>1</sup> ;
- the right to restrict processing.

For example, if an individual disputes the accuracy of their data, they can ask the organisation to temporarily freeze the processing of their data while it carries out the necessary checks.

### To exercise your rights or if you have any questions about the processing of your data under this scheme, you can :

CONTACT THE  
PVCP GROUP  
DATA  
PROTECTION  
OFFICER (**DPO**)



[data.privacy@groupepvcp.com](mailto:data.privacy@groupepvcp.com)



PIERRE & VACANCES Group - CENTER PARCS  
Espace Pont de Flandre  
11 rue de Cambrai - 75019 PARIS

LODGING A  
COMPLAINT WITH  
**CNIL**



[www.cnil.fr/fr/plaintes](http://www.cnil.fr/fr/plaintes)



CNIL - Complaints Department  
3 Place de Fontenoy  
TSA 80715 75334 PARIS CEDEX 07

<sup>1</sup> A request for the deletion of data cannot be met until the investigation in progress has been completed or in the event of legal or disciplinary proceedings being initiated.

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# EXAMPLES

# PRACTICES

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*I'm a management controller and I discover that my company's financial director is committing fraud. I don't know if the managing director is aware of this fraud and I don't know who to contact.*

In this type of situation, we encourage you to use the Whispli online platform to file an alert. An investigation will be carried out to gather all the information on this situation.



*I'm a maintenance manager on a Center Parcs estate and I've been made redundant. I have challenged my dismissal before the Labour Court and have also asked for my overtime to be paid. I would like to issue an alert to protest against this situation.*

As this is a human resources issue that does not fall within the scope of the alert, your alert would not be admissible.



*I'm an employee of a catering subcontractor of the PVCP Group and a buyer has asked me to renew our subcontract by paying him a percentage of the turnover generated by a consulting company he has set up.*

It is extremely important to inform the Group of any solicitation of corruption from one of our employees. We therefore invite you to file an alert on the Whispli platform and an investigation will be carried out as soon as possible.

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