

## Alert system procedure Edition 2023

Please note that the terms "Bonduelle", "Bonduelle Group", "Employee(s)" and "Stakeholder(s)" have the same meaning as in the Bonduelle Group Ethics Charter.

This procedure is based on the values shared by the Bonduelle Group's employees and its stakeholders, which are expressed through behaviors that call on each and every one of us to use common sense, discernment, exemplarity and responsibility. It's up to us to respect and promote it.

1

### WHAT IS AN ALERT?



#### Definition

An alert involves reporting or disclosing information about :

- a crime (e.g. murder, rape) ;
- a misdemeanour (e.g. corruption or harassment);
- a threat or prejudice to the general interest (e.g.: actions likely to endanger health);
- a violation or attempted concealment of a violation of international or European Union law, statute or regulation (e.g. violation of the European Data Protection Regulation).



#### The field of alert at Bonduelle

- Corruption or attempted corruption or conflict of interest
- A serious problem or risk relating to the health, integrity, equality and safety of individuals
- Any problem relating to the safety, authenticity, legality or quality of products
- A serious problem or risk relating to the environment
- A serious problem or risk relating to human rights and fundamental freedoms
- An anti-competitive or unfair practice
- An act or attempted act threatening economic or financial interests
- Retaliation for whistle-blowing
- Other violation of internal ethical principles
- Other crime or misdemeanor



Simple malfunctions are not sufficient grounds for an alert. In this case, contact your HR department, your manager, your Bonduelle contact if you are a stakeholder, or via the dedicated online form if you are a customer.

The facts may result from Bonduelle's direct or indirect activities.

## 2

### WHEN AM I CONSIDERED A WHISTLE-BLOWER?



To launch an alert, you must:

- Be an employee or stakeholder of the Bonduelle Group;
- Be an individual;
- **Not receive any direct financial compensation** for raising an alert. If you have received remuneration for making the alert, you will not benefit from whistleblower protection;
- **Be acting in good faith**, i.e. have reasonable grounds for believing that the facts reported are true, in the light of the information available to you.



Before issuing an alert: Make sure you have concrete evidence of the information you wish to disclose.



If you are acting outside a professional capacity, make sure you have personal knowledge of the facts.

## 3

### WHAT PROTECTION DO I HAVE?

Bonduelle takes all **necessary measures** to guarantee the **integrity** and **confidentiality** of the identity of the whistleblower, of the persons concerned by the whistleblowing, and of the information gathered.



Feel safe and confident!

- **No unfavorable decision** will be taken against you in connection with the alert. That would constitute retaliation, and you are protected against that!
- You are also **protected** from **civil and criminal liability**.
- If you **use the system in good faith**, even if the facts turn out to be inaccurate, you will not be penalized in any way.

This **protection** also extends to **protected third parties**, i.e. :

- **facilitators**: any person (individual or legal person under private non-profit law) who helps you to make an alert. For example, a colleague who helps you is considered a facilitator;
- individual or legal persons in a relationship with you who are at risk of reprisals as a result of the alert.



# 4

## HOW DO I RAISE AN ALERT?



### Traditional channels

The use of the platform is optional, you can launch an alert, and benefit from the protection status, by using the **traditional channels** (HR contact, manager, ...).

For Employees and Stakeholders of the "Bonduelle Fresh Americas" Business Unit, you can launch an alert via the dedicated automated telephone line: +1 415 856 9553, which will transcribe your alert directly.

You can also contact an external authority, in accordance with local laws.



### External, secure platform

Bonduelle has set up an **external platform** accessible to all its employees and stakeholders:

[bonduelle.whisppli.com/alert](https://bonduelle.whisppli.com/alert)



It allows you to remain anonymous, if you wish, and meets the **requirements of security, integrity, confidentiality and protection of personal data.**

**If you wish to remain anonymous**, Bonduelle has no way of identifying you, and **your anonymity will be preserved for as long as you wish.**

**In all cases, confidentiality is respected and you are protected!**



The alert can only be made public under strict conditions, laid down by local laws, which are binding on you.

# 5

## HOW IS THE ALERT HANDLED?



### Delays

Regardless of the means used to launch your alert, you will be informed of its **receipt** within **7 days** via the channel used.

You will receive an initial response, and we will inform you of the **actions planned** and/or already taken to assess the accuracy of the facts and remedy the situation reported within **3 months**.

If the situation is **complex**, this period may be extended to **6 months**, in which case you will be informed and may be asked to provide further information.



### Alert handlers

A **collegial governance** structure has been set up, comprising **expert and impartial** members of Group management.

They are responsible for :

- collecting alerts ;
- setting up investigation committees according to the type of alert;
- ensuring that the investigation runs smoothly;
- taking part in deciding what action to take and closing the investigation.

**Each person involved** in handling the alert is bound by a **strict obligation of confidentiality**, to which he or she is contractually committed.

Bonduelle guarantees that **no one who is not authorized** to know about the alert **will have access to it.**

The role of the Ethics Committee is not to receive alerts. It only ensures that alerts are handled correctly.

If you have not received a reply and/or feel that your alert is not being handled, you can contact the Ethics Committee. [ethics\\_committee@bonduelle.com](mailto:ethics_committee@bonduelle.com)





## The investigation process

When an alert is received, **an initial analysis** is carried out to ensure that it is indeed an alert and that it is **admissible**.

If the **conditions** for filing an alert **are not met**, if the facts are inaccurate or unfounded, or if the alert has become irrelevant, the alert is **closed** and the whistleblower is **informed in writing**.

On the other hand, **if the facts appear to be true**, Bonduelle **does everything in its power to remedy the situation**.



## The person involved

When an alert is launched, the person implicated is **presumed innocent** and to have acted in accordance with the Ethics Charter, the Guide to Preventing Corruption and Influence-Peddling, and applicable laws and regulations.

Bonduelle will take all **necessary measures** to **protect the identity** of the **persons concerned**. This information is confidential and will not be divulged.

After the investigation, **if the facts are proven**, the **person concerned** may be **sanctioned**:

- If the person is an employee, disciplinary action may be taken;
- If the person is a Stakeholder, relations may be terminated immediately.

Legal action may be taken against the person implicated.

# 6

## HOW IS MY DATA PROTECTED?

The Bonduelle Group companies are responsible for processing alerts from their employees and stakeholders.

The legal basis for the processing is compliance with the legal obligations incumbent on Bonduelle Group companies, namely:

- Articles 8 and 17 of French law no. 2016-1691 of December 9, 2016; Article L. 225-102-4 of the French Commercial Code;
- Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019;
- French law n°2022-401 of March 21, 2022.



### Personal data processed

The **following data** may be processed as part of the whistle-blowing system:

- Identity, function and contact details of the whistle-blower;
- Identity, function and contact details of persons who are the subject of an alert;
- Identity, function and contact details of persons involved in the collection and processing of the alert;
- Facts reported ;
- Information gathered as part of the investigation to verify the facts reported;
- Report on the investigation carried out;
- Action taken on the alert.



### Alert recipients

The persons in charge of handling a professional alert within the Bonduelle Group **receive the alert for verification and processing.**

Certain people may be asked to **investigate** to verify the facts. These persons are persons of trust and are bound by an obligation of confidentiality.

Thus, **information** that could identify the whistle-blower **can only be disclosed, except to the judicial authorities, with the person's consent.**

Similarly, information that could identify the **person implicated** by an alert **may only be disclosed, except to the judicial authority, once the alert has been established as well-founded.**



### Transfer of data to a third country

When an alert is processed, personal data may be transferred from Bonduelle's head office in France to the persons in charge of processing the alert in the entities concerned, in order to enable alerts to be processed.



### Data retention period

Data relating to an alert considered by the data controller to **fall outside the scope** of the system are **destroyed** or **archived** without delay, **after anonymization.**

When the **alert is not followed by disciplinary or legal proceedings**, the data relating to the alert is **destroyed** or **made anonymous within two months** of the end of the verification operations.

When **disciplinary or legal proceedings** are initiated against the person implicated or the author of an abusive alert, the data relating to the alert is kept **until the end of the proceedings** or the **time limit for appeals** against the decision.



### Respect for individual rights

You have the right to **access, rectify, limit and delete your personal data.**

You can send an e-mail to [dpo\\_france@bonduelle.com](mailto:dpo_france@bonduelle.com).

If, after contacting us, you feel that your rights have not been respected, you may lodge a complaint with the supervisory authority in your country.