

# Ethics & Compliance

by Pernod Ricard

Speak  
 up

## Data Privacy Information Policy

*October 2024*

# Preamble



In accordance with legal and regulatory provisions, **PERNOD RICARD**<sup>1</sup> (hereinafter, the "**Company**") has set up a specific whistleblowing ethics line called "**Speak Up Line**" enabling its employees and external stakeholders to report a certain number of malfunctions that could affect the Company's activity or reputation and/or that could seriously engage the Company's liability.

Although the use of this Speak Up Line does not preclude other traditional internal channels from being used (Manager, HR, Legal or Ethics & Compliance teams), it is in everyone's interest that you do not hesitate to report any concern via this Speak Up Line, so that the Company can be in a position to draw the appropriate conclusions. The failure to use this Line may not result in sanction against an employee.

The Speak Up Line preserves strict confidentiality both as regards the identity of the person who reports a concern (the "**Reporter**"), the persons targeted by it and the information collected by the recipients of the concern, as detailed below.

Please refer to our dedicated [Speak Up Policy](#) before reporting any concern.

<sup>1</sup> The term « PERNOD RICARD » or the "Company" refers to both PERNOD RICARD SA and its affiliated entities.

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# What can be reported through the Speak up Line?



## What can be reported through the Speak up Line?

- Any improper behaviour or situation contrary to our Code of Business Conduct, or our internal policies and standards;
- A violation of the law or regulations;
- A threat or serious prejudice to the public interest.

An indicative list of issues, covering matters that can be reported on Speak Up, can be found in Appendix 1 of the Speak Up Policy.

Any concern sent via the Speak Up Line which would not meet the requirements of the rules set forth in the Speak Up Policy may not be taken into consideration.

# Nature of the personal data collected and purpose of processing

Personal data collected in this context will be processed exclusively in accordance with the Speak Up Policy, and to enable the Company to verify the facts reported in the concern and determine the actions to be taken. The term “action” refers to any decision made by the Company to draw consequences from the concern.

The processing of personal data in this context is based on the applicable legal obligations, in particular pursuant to the Law Sapin II and the French Law on duty of care, or as the case may be, the legitimate interest to ensure compliance with the Pernod Ricard group Code of Business Conduct (“COBC”).

The following personal data may be processed in this context:

- Identity, functions and contact details of the Reporter;
- Identity, functions and contact details of the persons implicated by the concern;
- Identity, functions and contact details of the persons involved in receiving or handling the concern;
- The facts reported;
- Information obtained in the course of the investigation of the facts reported;
- Record/summary of the investigation process;
- Actions taken following the investigation.

If permitted under applicable local laws, the Reporter may choose to remain anonymous (regardless of the channel used to raise the concern), although this is not encouraged as it makes it more difficult to conduct a thorough investigation.

In all cases, the Reporter must ensure that all the information he/she provides is factual, relevant and directly linked to the concern.

# Rights of the Reporter and the person implicated by the concern

The Company will keep the identity of the Reporter, the facts reported, and the identity of any persons targeted by the concern strictly confidential.

The Reporter's identity will not be disclosed without the Reporter's consent and the identity of the person(s) targeted by the concern will only be disclosed if the concern is substantiated, but always on a strict need to know basis and subject to the strictest confidentiality obligations.

However, exceptionally if required by local law, the Company may disclose the identity of the Reporter without his/her consent, as well as the identity of any persons targeted by the concern, to the judicial authorities.



## 3.a. The Reporter's protection

The Reporter may not be dismissed, sanctioned or discriminated against in any way for having reported facts in accordance with the Speak Up Policy.

Pernod Ricard has zero-tolerance towards retaliation against anyone who has reported an allegation or supported an investigation in good faith. Any form of retaliation will be treated very seriously and may result in disciplinary sanctions, even in case of malicious report (which may result in disciplinary actions and prosecution too).



### **3.b. Information to be provided to the person targeted by the concern**

The person targeted by the concern will be informed of the existence of the concern against him as soon as possible. The information communicated does not contain any information relating to the identity of the Reporter or third parties.

However, where it appears necessary to implement precautionary measures in order to prevent the destruction of evidence relating to the concern, this person shall be informed after the adoption of such measures with the following information:

- if they have not previously benefited from it, clear and complete information on the Speak Up Line;
- the identity of the controller for the collection and processing of the concern;
- the facts reported in the concern;
- the potential recipients of the concern, the department designated to carry out verifications and possible investigations;
- the procedures for exercising their rights of access and rectification of their personal data.

# Treatment and retention of data collected

## 4.a. Security measures

All precautions have been taken to store the information relating to a concern in a secure environment.

Access to data processing is by a personal ID and password, regularly renewed, or by any other means of authentication. These accesses will be recorded, and their regularity controlled.

## 4.b. Conservation period for the data collected

The Personal Data relating to an alert may be kept until a final decision has been taken on the action to be taken. This decision must be taken within a reasonable time of receipt of the alert.

Once the final decision has been taken on the action to be taken on the alert, the Personal Data may be kept (with limited access) for the time strictly proportionate to their processing and to the protection of their authors, the persons they concern and the third parties they mention, taking into account the time required for any further investigations.

When disciplinary or litigation proceedings are launched against a person implicated or the author of an abusive alert, the Personal Data relating to the alert may be kept until the end of the proceedings or the limitation period for appeals against the decision taken.

Personal Data will be kept for longer periods (with limited access) if Pernod Ricard is legally obliged to do so (e.g., to meet accounting, social or tax obligations), or for evidentiary purposes with a view to a possible control or dispute, or for the purposes of carrying out quality audits of the alert handling processes.

The duration of the data conservation may vary from country to country, depending on the applicable law at the local level, and may be subject to legal or regulatory obligations.



## 4.c. Transfer of data collected to a non-EU Member State

Personal data collected by the Company as part of the report process are transferred to a country that is not a member of the European Economic Area, in particular in the following countries: Australia and in particular all countries in which the group of companies to which the Company belongs (to the extent such transfer is necessary for the investigation management).

In this respect, the Company has entered into an agreement with Whispli providing with adequate safeguards (included the conclusion of standard contractual clauses issued by the European Commission) and meeting the requirements of French and European regulations.

With regard to transfer flows within the group of companies to which the Company belongs, these are covered by a mechanism that adequately guarantees data protection.

You have the right to obtain information about the transfer mechanism by which your Personal Data is transferred outside the European Economic Area and the country to which it is transferred by contacting [groupdpo@pernod-ricard.com](mailto:groupdpo@pernod-ricard.com).

# Recipients of the data collected

Depending on the circumstances and the needs to manage the concern, data collected for the management of such concerns may be communicated to the Company and/or the concerned company within the Group of companies to which the Company belongs, more specifically the members of the Company's Integrity Committee or members of the local Ethics & Compliance or HR teams that are directly responsible for investigating the concern.

This data may also be communicated to their service providers mandated for this purpose (such as law firms of any other provider of assistance in conducting investigations or analysing and storing data) and to external auditors and counsels when needed.

The companies within the group of companies to which the Company belongs remain data controller of the information they obtain about a concern and which they will use on their own behalf (to conduct internal investigations).

When so required by law or by a legal order, such data may also be disclosed to the judicial authorities to comply with applicable laws and regulations.

In any case, the service provider designated to collect or to process concerns, the persons responsible for this mission within the Company and/or the concerned company shall have access to all or part of the data referred to in Section 2 only within the limits of their respective powers and only to the extent necessary for the accomplishment of their tasks.

# Rights of involved individuals

Subject to the conditions set out by the applicable, users of the Speak Up Line, as well as any person identified within the process, have a right of access, rectification, and deletion of their data, and a right of restriction and objection to the processing of their data.

The person who is targeted by a concern may under no circumstances obtain communication by the controller, on the basis of his or her right of access, of information concerning the identity of the individual who reports the concern.

Persons whose personal data are collected and processed in the context of a concern, including related internal investigations, may lay down general or specific guidelines for the storage, deletion and communication of their personal data after their death where the law of the State in which the controller is established so permits.

To the extent that any processing of personal data is based on the person's consent (as may be the case for the Reporter's identity disclosure), the person has the right to withdraw their consent at any time, without affecting the lawfulness of processing prior to such withdrawal.

These rights can be exercised by contacting [groupdpo@pernod-ricard.com](mailto:groupdpo@pernod-ricard.com).

You also have the right to file a complaint with your local data protection supervisory authority. In France, it is the CNIL 3 Place de Fontenoy, 75007 Paris.

The Company has a Data Protection Officer who can be contacted at the following address: [groupdpo@pernod-ricard.com](mailto:groupdpo@pernod-ricard.com).

## Who is in charge of this processing?

Regardless of the channel used, the receipt and analysis of a concern, as well as any investigation carried out, will include the processing of personal data by the Company and/or companies in the group of companies to which the Company belongs.

The Company acts as a data controller in the context of the implementation and management of the whistleblowing system and internal investigations, its storage, protection, and use, as well as the persons having access to it and for what purposes.

However, in the event that the concern is sent to the concerned company in the group of companies to which the Company belongs, or if the Reporter chooses local management of the concern by the concerned company (where available), this company is the data controller of the information transmitted to it and which it will then use on its own behalf, in particular to conduct internal investigations, in accordance with the applicable law and provisions.

## Contact

**For functional support,  
please contact:**

**@Affiliate:**

*Your Local Compliance Officer*

**@HQ:**

*Ethics & Compliance Team*

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**For technical support,  
please contact:**

Your Local Pernod Ricard IT Bar