

# Whistleblowing New Zealand Procedure

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## 2 PURPOSE & SCOPE

Every employee of JCDecaux New Zealand, as well as every third party or external partner (such as vendors or subcontractors), has the opportunity to follow this whistleblowing procedure, with respect to the criteria and conditions stated in either:

- the Protected Disclosures (Protection of Whistleblowers) Act 2022; or
- the French law n°2016-1691 of 09/12/2016 called « Sapin II » (regarding transparency, the fight against corruption and the modernisation of economic life)

This whistleblowing procedure also concerns any situation of infringement of the Fundamental Ethical Rule set forth by the Code of Ethics of the JCDecaux Group regarding allegations of corruption or influence peddling.

The purpose of this Procedure is to:

- Set out the processes put in place by JCDecaux New Zealand relating to reporting of suspected serious wrongdoing; and
- Protect employees who make such disclosures within the safeguards of the relevant legislation.

It allows reporting, depending on the nature of the subject and on the geographical location of the whistle-blower, firstly to an officer or senior manager of a JCDecaux group company, then, secondly, the Group's Ethic Committee.

## 3 DEFINITIONS

**Whistleblower Law** means Protected Disclosures (Protection of Whistleblowers) Act 2022.

**Discloser** - Under the Whistleblower Law, "discloser", in relation to an organisation, means an individual who is (or was formerly):

- an employee;
- a homemaker;
- a secondee to the organisation;
- engaged or contracted under a contract for services to do work for the organisation;
- concerned in the management of the organisation (including a person who is a member of the board or governing body of the organisation);
- a volunteer working for the organisation without reward or expectation of reward for that work.

**Protected Disclosure** – For the purposes of this Procedure, "protected disclosure" has the same meaning as set out in the Whistleblower Law A disclosure of information is a protected disclosure if the discloser:

- believes on reasonable grounds that there is, or has been, serious wrongdoing in or by JCDecaux; and
- discloses information about that in accordance with the Whistleblower Law; and
- does not disclose it in bad faith.

**Serious wrongdoing** - The definition of serious wrongdoing set out in the Whistleblower Law includes any act, omission, or course of conduct in or by JCDecaux that is 1 or more of the following:

- an offence;
- a serious risk to:
  - public health; or
  - public safety; or
  - the health or safety of an individual; or
  - the environment;
- a serious risk to the maintenance of law, including:

- i. the prevention, investigation, and detection of offences; or
  - ii. the right to a fair trial;
- (d) an unlawful, corrupt, or irregular use of funds or public resources; or

**Appropriate Authority** - For the purposes of this Procedure, “appropriate authority” has the same meaning as set out in the Whistleblower Law. It includes the head of any public sector organisation, any officer of Parliament, Commissioner of Police and the Director of the Serious Fraud Office. It does not include Members of Parliament or a Minister.

## 4 PROCEDURE

### 4.1 Legal Protections available to Disclosers in New Zealand

The relevant safeguards are provided under:

- the Whistleblower Law, which can be viewed here:  
<https://legislation.govt.nz/act/public/2022/0020/latest/whole.html>
- the Human Rights Act 1993, which can be viewed here:  
<http://www.legislation.govt.nz/act/public/1993/0082/latest/DLM304212.html>.
- the Employment Relations Act 2000, which can be viewed here:  
<https://www.legislation.govt.nz/act/public/2000/0024/latest/whole.html#DLM58317>

With effect from 1 July 2022, updated laws protecting disclosers come into effect in New Zealand, replacing the previous legislation *Protected Disclosures Act 2000*.

The new Whistleblower Law applies to disclosures made on or after 1 July 2022, however they may refer to matters that occur or have occurred at any time, either before or after 1 July 2022.

#### 4.1.1 Who is covered by the Protected Disclosures Act?

Section 4.2 of this Procedure sets out who the Whistleblower Law applies to.

#### 4.1.2 To whom can a disclosure be made?

Section 4.3 of this Procedure sets out to whom a disclosure can be made for the purpose of the Whistleblower Law.

#### 4.1.3 What matters must a disclosure relate to in order to be protected?

The Whistleblower Law (and as set out in Section 3) defines what amounts to a protected disclosure.

#### 4.1.4 What matters are not protected?

Disclosures will not be protected under the Whistleblower Law to the extent that the information disclosed:

- concerns a personal work-related grievance of the discloser;
- there are no reasonable grounds to believe that the disclosure amounts to serious wrongdoing;
- the disclosure is not disclosed in accordance with the Whistleblower Law; or
- the disclosure is disclosed in bad faith.

Information disclosed concerns a **personal work-related grievance** of the discloser if:

- the information concerns a grievance about any matter in relation to the discloser’s employment, or former employment, having (or tending to have) implications for the discloser personally; and
- the information:
  - does not have significant implications for the JCDecaux group company to which it relates, or another

- JCDecaux group company, that do not relate to the discloser; and
- does not concern conduct, or alleged conduct, of a kind for which disclosures are protected, as set out in section 3 above.

Examples of grievances that may be personal work-related grievances (but subject to the qualifications above) are as follows:

- an interpersonal conflict between the discloser and another employee; or
- a decision relating to the engagement, transfer or promotion of the discloser; or
- a decision relating to the terms and conditions of engagement of the discloser; or
- a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

#### 4.1.5 Protections afforded to disclosers: Confidentiality

Every person to whom a protected disclosure is made or referred (including JCDecaux) must use his or her best endeavours not to disclose information that might identify the discloser.

However, the Whistleblower Law does allow JCDecaux to make disclosures if:

- (a) the discloser consents to the release of the identifying information; or
- (b) there are reasonable grounds to believe that the release of the identifying information is essential:
  - (i) for the effective investigation of the disclosure; or
  - (ii) to prevent serious risk to public health, public safety, the health or safety of any individual, or the environment; or
  - (iii) to comply with the principles of natural justice; or
  - (iv) an investigation by law enforcement or regulatory agency for the purpose of law enforcement.

Before releasing the identifying information:

- if the release is for Section 4.1.5(a)(i) or 4.1.5(a)(iii), JCDecaux must consult the discloser about the release; or
- if the release is for Section 4.1.5(a)(ii) or 4.1.5(a)(iv), JCDecaux must, if practicable, consult the discloser about the release.

In the event JCDecaux releases the identity of the discloser breaching this section 4.1.5, the discloser has additional rights under the Privacy Act 2020, which includes but is not limited to, the right to make a complaint to the Privacy Commissioner.<sup>1</sup>

Anyone may seek information and guidance from an Ombudsman about the duty of confidentiality in this section 4.1.5.

#### 4.1.6 Protections afforded to disclosers: Immunity to civil, criminal and disciplinary proceedings

If a person makes a protected disclosure under the Whistleblower Law or refers a protected disclosure of information to JCDecaux or an Appropriate Authority for investigation, the person or the receiver who refers a protected disclosure under Section 4.5.2, will not be liable to any civil, criminal or disciplinary proceedings because of making or referring the disclosure.

It is important to note that, with some limited exceptions, the protection afforded above relates to the fact that the person has made a disclosure. A person may still be subject to civil, criminal or administrative liability for their own prior conduct which may be revealed by the disclosure.

<sup>1</sup> Refer to section 18 of the Whistleblower Law for further information.

#### 4.1.7 Protections afforded to disclosers: No Victimisation

It is unlawful for any person (including JCDecaux) to treat or to threaten to treat a person less favourably than he or she would treat other persons in the same or substantially similar circumstances because:

- (a) that person, or any relative or associate of that person:
  - (i) intends to make, or has made, a protected disclosure under the Whistleblower Law; or
  - (ii) has encouraged another person to make a protected disclosure; or
  - (iii) has given information in support of, or relating to, a protected disclosure ; or
- (b) he or she believes or suspects that that person, or any relative or associate of that person, has done, or intends to do, any of those things described in Section 4.1.7(a).

#### 4.1.8 Protections afforded to disclosers: No Retaliation by JCDecaux

It is an offence for JCDecaux to retaliate, or threaten to retaliate, against an employee because the employee intends to make or has made a protected disclosure.

If JCDecaux retaliates, or threatens to retaliate, against an employee, the employee has a “personal grievance” under the Employment Relations Act 2000.

“Employee”, “employer” and “retaliate” have the same meanings given to it under the Employment Relations Act 2000.

#### 4.1.9 Extent of Protection

A discloser is entitled to protection even if:

- (a) they are mistaken and there is no serious wrongdoing; or
- (b) they do not refer to the name of the Whistleblower Act when making the disclosure; or
- (c) they technically fail to comply with Section 4.3 (as long as they have substantially complied); or
- (d) they also make the disclosure to another person, as long as they do so:
  - (i) on a confidential basis; and
  - (ii) for the purposes of seeking advice about whether or how to make a protected disclosure in accordance with the Whistleblower Law.

#### 4.1.10 Requirement to act in good faith

The protections offered by the Whistleblower Law and this Procedure do not apply where the discloser makes a disclosure he or she knows to be false or otherwise acts in bad faith. Allegations made maliciously or in bad faith may result in disciplinary action.

#### 4.1.11 Availability of the Procedure

The Whistleblower Law requires that this procedure contain information about how the procedure is to be made available to officers and employees of the company.

JCDecaux will make this Procedure available on its internal intranet, as well as on its public website at [www.jcdcecaux.co.nz](http://www.jcdcecaux.co.nz).

Where employees or contractors do not have access to the intranet, JCDecaux will display hard-copy information regarding this Procedure, or a summary version of the Procedure, at applicable locations or premises.

JCDecaux also conducts training to inform employees and management of their rights and obligations under the Whistleblower Law.

## 4.2 Does the Whistleblowing Procedure and Whistleblower Law apply to you?

Employee	You can use this procedure if you are faced with a situation: <ul style="list-style-type: none"> <li>o contrary to the Fundamental Ethical Rules (corruption/influence peddling, free competition, financial infringements) set forth by the Code of Ethics<sup>1</sup> of the JCDecaux Group; or</li> <li>o a situation which constitutes a 'protected disclosure', as defined in Section 3 of this Procedure<sup>2</sup></li> </ul>
Third Party Supplier or Contractor <sup>3</sup>	You can use this procedure if you are faced with a situation which constitutes a protected disclosure as defined in Section 3 of this Procedure <sup>2</sup> .

(1) Available on the intranet and public website of JCDecaux New Zealand.

(2) And as per the Whistleblower Law.

(3) third party subcontractors or vendor, associates, intermediaries, interns, consultants, service providers and employees of external partners.

## 4.3 Whom can I send my report to?

Employee, Third Party Supplier or Contractor	<p>A. <u>Reporting Process</u></p> <p>In order to claim the protections described in section 4.1 above, information about serious wrongdoing should be reported to:</p> <ul style="list-style-type: none"> <li>• A senior manager of any JCDecaux Group company. For the purpose of any company in the JCDecaux Australia and New Zealand Group, "senior manager" is any person who is part of the Executive Leadership Team or the Senior Leadership Group.</li> <li>• The Secretary of the JCDecaux Group's Ethics Committee by email at <a href="mailto:comite.ethique@jcdecaux.com">comite.ethique@jcdecaux.com</a>.</li> </ul> <p>You may use the Whistleblowing Reporting Form available on the Intranet or external website to report; however, it is not mandatory to use the form.</p> <p>Any disclosure to any of the above recipients (other than the secretary of the JCDecaux Group's Ethics Committee) should be notified to the JCDecaux Group's Ethics Committee by providing them with a copy of such disclosure.</p> <p>B. <u>Disclosures to the head of JCDecaux</u></p> <p>In order to claim the protections described in section 4.1 above, a disclosure of information can also be made to either the Country Head New Zealand or the Chief Executive Officer Australia &amp; New Zealand.</p> <p>C. <u>Disclosure to an Appropriate Authority</u></p> <p>In order to claim the protections described in section 4.1 above, a disclosure of information can also be made to an Appropriate Authority.</p> <p>D. <u>Disclosure to a Minister</u></p> <p>If the discloser believes on reasonable grounds that the person receiving the protected disclosure has not been dealt in accordance with section 4.4 or in a manner so as to address the serious wrongdoing, the discloser is entitled to protection for a disclosure made to a Minister.</p>
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### For Managers:

Any disclosure to you as a senior manager must be notified to the JCDecaux Group's Ethics Committee by providing them with a copy of such disclosure at the email address referred to above.

### Note:

If you do not have the ability to complete and send the form electronically and confidentially, you can leave your report on the voicemail provided by the Secretary of the Group's Ethics Committee (+33(0)1 30 79 79 11).

## 4.4 The Content of your Report

Specific and Impartial Facts	<ul style="list-style-type: none"> <li>o The information submitted via the framework of this whistleblowing procedure should be submitted without self-interest and in good faith, be articulated impartially and be sufficiently specific in order to be able to verify the allegations.</li> <li>o Only the information necessary to the review of the appropriateness of the report must be submitted and the forms used to describe the nature of the facts reported must show their presumed nature.</li> <li>o If the discloser has any personal interest or involvement in the matter, this should be declared at the outset.</li> </ul>
Facts Personally Known	<ul style="list-style-type: none"> <li>o The discloser should have personal knowledge of the matters disclosed.</li> </ul>
Your Identity	<ul style="list-style-type: none"> <li>o We encourage the discloser to identify him or herself while using the alert procedure so that he or she may be contacted to provide additional information.</li> <li>o As an exception, an anonymous report may be processed if the claims mentioned are sufficiently serious and the report is supported by sufficient detailed information.</li> </ul>
Contact Information	<ul style="list-style-type: none"> <li>o The discloser should provide information so that he or she may be contacted during the investigation if additional information is needed.</li> </ul>

### Warning: False Reports are sanctionable:

Any person abusing this procedure or reporting claims in bad faith, with intention to harm or knowing their untruthful nature, may be subject to disciplinary sanctions according to the internal rules applicable within the JCDcaux entity concerned, as well as legal proceedings.

## 4.5 Processing and Investigation of your Report

### 4.5.1 Receipt and processing of the report

- The discloser will be informed of the receipt of his or her report as soon as practicable and the time needed to examine its admissibility by means of a written and dated acknowledgement of receipt. The acknowledgement of receipt does not mean that the report is admissible.
- If, as an employee of the JCDcaux Group, the discloser has reported to his or her immediate supervisor, the report shall be processed by the latter, who shall give it the appropriate evaluation (processing, closing incident without further action or transfer to the Secretary of the Group's Ethics Committee, which may send it back to the Operational Management or to the Legal Department, in order to investigate the allegations and process the report).
- If the discloser has directly reported to the Secretary of the Group's Ethics Committee, the latter will directly process the report within the framework of its responsibilities. The Secretary may send it back to the discloser's immediate supervisor and/or to the Operational Management and/or to the Legal Department, in order to investigate the allegations and process the report.
- The report will then be considered and a decision will be made in respect of the type of investigation to be undertaken (if any). If deemed necessary, JCDcaux may appoint an appropriate external investigator to undertake an investigation into suspected serious wrongdoing.
- JCDcaux will check with the discloser whether the disclosure has been made elsewhere (and the outcome of that disclosure).
- The discloser will be informed within 20 working days of the high-level investigation plans and the timeframe required to complete the investigation.
- In any case, the investigation will commence as soon as practicably possible after the discloser's disclosure. The



JCDecaux Group will fully and fairly investigate the matters the subject of any legitimate complaint, having regard to the principles of natural justice, including:

- > remaining unbiased and impartial;
  - > applying procedural fairness;
  - > making a decision only once all parties involved (or alleged to be involved) in the alleged serious wrongdoing have been given the opportunity to be heard;
  - > giving all parties involved (or alleged to be involved) in the alleged serious wrongdoing reasonable notice of any interview;
  - > advising all parties involved (or alleged to be involved) in the alleged serious wrongdoing that they may be represented at any interview;
  - > giving all parties involved (or alleged to be involved) in the alleged serious wrongdoing a reasonable opportunity and period of time to respond to the allegation.
- JCDecaux may seek additional information from you as reasonably necessary to investigate any disclosure.
  - JCDecaux will recommend that persons mentioned in a report obtain independent legal advice and will afford them the opportunity to do so. JCDecaux may seek additional information from the discloser as reasonably necessary to investigate any disclosure.
  - JCDecaux will seek legal advice in relation to any disclosed matter as it deems appropriate. JCDecaux will comply with any and all laws pertaining to any verified matters legitimately disclosed in a report.
  - JCDecaux will deal with the matter by doing 1 or more of the following:
    - Investigate the disclosure
    - Address any serious wrongdoing by acting or recommending action
    - Refer the disclosure to an Appropriate Authority in accordance with the Whistleblower Law
    - Decide that no action is required in accordance with the Whistleblower Law
  - JCDecaux will keep the discloser informed of the progress and outcome of its investigation, noting that the time required for a full and thorough investigation may vary significantly depending on the subject matter of the disclosure.

The following parts of this section (4.5.3 to 4.5.6) are only applicable to the extent that personal information in connection with a report under this procedure is transferred to a company in the JCDecaux Group in France, for example where information is provided to the Group's ethics committee.

#### 4.5.2 Receiver may refer disclosure

If a person makes a protected disclosure under the Whistleblower Law to JCDecaux or an appropriate authority for investigation:

- JCDecaux may refer the protected disclosure to an appropriate authority
- The appropriate authority may refer the protected disclosure to JCDecaux or another appropriate authority.

Before a protected disclosure is referred, the receiver must consult the discloser and the intended recipient of a referral. The recipient becomes a receiver of the disclosure under the Whistleblower Law.

#### 4.5.3 Data processing

- The whistleblowing procedure set forth herein is implemented by JCDecaux SA in its role as Data Processor (as defined under the GDPR).

- The whistleblowing procedure implies a personal data processing, which purpose is the evaluation and processing of the report which has been transmitted in accordance with the procedure set forth herein.
- Only the following categories of data shall be processed within the framework of the whistleblowing procedure:
  - identity, professional duties and contact details of the author of the report;
  - identity, professional duties and contact details of the persons targeted by the report;
  - identity, professional duties and contact details of the persons participating in the investigation or the processing of the report;
  - facts reported;
  - information collected within the framework of the verification of the reported facts;
  - debriefing of the conclusions of the investigation;
  - continuation decided for the report.

#### 4.5.4 Retention period

- Any data relating to a report that is determined to be considered as out of the scope of the discloser alert procedure described below will be destroyed or filed immediately after having been anonymised.
- When the report is not followed by a disciplinary or judicial procedure, the data relating to such report will be destroyed or filed, having been anonymised, within a period of two months from the closing of the investigation.
- When a disciplinary or judicial procedure is engaged against the person concerned or the author of an abusive report, the data relating to the report will be kept until the end of the judicial procedure.
- The archives are kept according to the applicable regulation.

#### 4.5.5 Data transfers

- In the framework of the processing of the reports, some personal data relating to the authors of the reports or to the persons targeted by these alerts may be transferred outside the European Economic Area.
- JCDecaux SA commits to ensure a relevant level of protection for the data transferred within this framework, in particular by generalising Standard Contractual Clauses approved by the European Commission (to which it is possible to access by sending an e-mail to: dpo\_f@jcdecaux.com) or agreeing to the Privacy Shield (human resources data included) for the recipients of data located in the United-States.

#### 4.5.6 Rights of individuals

- In accordance with the regulations applicable to personal data protection in most of the countries in which the Group is present and, in particular inside the European Union, any person identified in the framework of an alert procedure, whether this person is the discloser or the target of the report, may contact the Secretary of the Group's Ethics Committee in order to exert the following rights:
  - the right to be informed: you have the right to be informed concisely, transparently, clearly and in a manner easily accessible about how your personal data is processed;
  - the right of access: you have the right to obtain (i) the confirmation that your personal data is /is not processed and, when they are, to obtain (ii) access to such data and a copy of the later ones.
  - the right to correct: you have the right to correct any inaccurate personal data about you which is inaccurate; you have the right as well to ensure that incomplete personal data is completed, by providing additional information;
  - the right to delete: in certain cases, you have the right to obtain the deletion of your personal data; however, this is not an absolute right and JCDecaux may have legal or legitimate reasons to keep such data;
  - the right to limit the processing: in certain cases, you have the right to limit the processing of your personal data;

- the right to introduce a claim with a control authority;
- the right to give directives concerning the use of data post-death: you have the right to give directives to JCDecaux concerning the use of personal data after your-death.
- You can send your request together with the copy of an identity document to the following e-mail address hereafter:
  - [comite.ethique@jcdecaux.com](mailto:comite.ethique@jcdecaux.com), or
  - you can leave a message on the voicemail dedicated of the Secretary of the Secretary of the Group's Ethics Committee (33(0)1 30 79 79 11).
- The person targeted by an alert will be informed by the Secretary of the Group's Ethics Committee from the date of registration of data concerning this person, in order to allow this person to respond to the processing of such data. When additional measures are necessary, in particular to prevent the destruction of evidence relating to an alert, the notification to this person will occur after the implementation of such measures.
- This person may also request, under the same conditions as above, to exert his/her rights.
- JCDecaux SA has as well designated a Data Protection Representative reachable through [dpo\\_f@jcdecaux.com](mailto:dpo_f@jcdecaux.com).

## 4.6 Submit your Report as an Employee of the JCDecaux Group Reporting Form

You may use the Whistleblowing Reporting Form available on the Intranet or external website to report, however it is not mandatory to use the form.

Any disclosure (other than to the secretary of the JCDecaux Group's Ethics Committee) should be notified to the JCDecaux Group's Ethics Committee by providing them with a copy of such disclosure to [comite.ethique@jcdecaux.com](mailto:comite.ethique@jcdecaux.com).

## 5 REFERENCES

[JCDecaux Code of Ethics](#)

[F100074 Whistleblowing Reporting Form – Employee](#)

## WHISTLEBLOWING REPORTING FORM

Submit this form as an employee of the JCDecaux group.

To submit the alert, please complete the form below.

Complete at least the mandatory fields marked with a \*

☐ I am an employee of JCDecaux.

Name/First name *	
Company * (subsidiary of the JCDecaux Group)	
Email address *	

Name/First name of your immediate supervisor *	
Department	

Report anticorruption/ethic (select the area/s)	<input type="checkbox"/> Corruption/influence peddling/misconduct/improper state of affairs or circumstances <input type="checkbox"/> Free competition <input type="checkbox"/> Financial infringement <input type="checkbox"/> Crime or offence <input type="checkbox"/> Clear and serious violation of an international commitment duly ratified or agreed by France, of a unilateral act by an international organisation pursuant to such commitment or of laws or regulations <input type="checkbox"/> Danger, threat or serious risk to the public or financial system
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Facts reported *	
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Submit  
to your executive or senior manager

OR

Submit  
to the Secretary of the Group's Ethic Committee

## WHISTLEBLOWING REPORTING FORM

Submit this form as a third-party subcontractor/vendor of the JCDecaux group.

To submit the alert, please complete the form below.

Complete at least the mandatory fields marked with a \*

☐ I am a third-party subcontractor/vendor of the JCDecaux Group.

Name/First name *	
Company/country *	
Email address *	

<b>Report anticorruption/ethic</b> <i>(select the area/s)</i>	<input type="checkbox"/> Corruption/influence peddling/misconduct/improper state of affairs or circumstances <input type="checkbox"/> Free competition <input type="checkbox"/> Financial infringement <input type="checkbox"/> Crime or offence <input type="checkbox"/> Clear and serious violation of an international commitment duly ratified or agreed by France, of a unilateral act by an international organisation pursuant to such commitment or of laws or regulations <input type="checkbox"/> Danger, threat or serious risk to the public or financial system
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<b>Facts reported *</b>	
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Submit  
to your executive or senior manager

OR

Submit  
to the Secretary of the Group's Ethic Committee