

DANONE ETHICS LINE PRIVACY STATEMENT

At Danone we want to know immediately about any breach or potential breach of our Code of Business Conduct, the Integrity Policy, any of our other Compliance Policies or any non-ethical conduct. We also want to hear about any unlawful behavior, financial malpractice and any activity which poses or is likely to pose a danger to the environment or to anyone working for Danone.

Concerns can be made by several channels. Employees and external stakeholders are always encouraged to discuss any concerns they may have directly with the relevant point of contact in Danone (such as a Line Manager, HR Manager, Finance Manager, Compliance Manager or Customer Relationship Manager).

However, should employees or our other stakeholders prefer to report a concern confidentially through another channel we also have a dedicated reporting tool available called DANONE ETHICS LINE - www.danoneethicsline.com ("DEL").

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 Danone SA and/or its subsidiaries ("Danone" or "we").

Danone SA is a company established under the laws of France, with head offices located at 17 Boulevard Haussmann, 75009 Paris, France.

For more information about Danone subsidiaries please visit the following link [[Autres Sites - Danone](#)]

For any questions you may have about this Privacy Statement, please contact us at dpo.group@danone.com.

1. WHAT ACTIVITIES ARE COVERED BY THIS POLICY?

At Danone we are committed to protecting the right to privacy. We aim to protect any personal data we hold, to manage personal data in a responsible way and to be transparent in our practices.

This Privacy Statement (the "**Statement**") describes how we collect and use personal data when a concern is received regardless the channel used, and it covers any concern raised by an employee or a third party regarding an event that may pertain to, including but not limited to, the following subjects:

- (a) A crime or an offence;
- (b) A failure to comply with any legal or regulatory obligations;
- (c) A threat or serious damage to the public interest;
- (d) A breach of Danone's Integrity Policy, including those situations likely to characterize acts of bribery, corruption, influence peddling or fraud; A risk of serious violation of human rights and fundamental freedoms, the health and safety of individuals and the environment resulting from the activities of Danone, its subsidiaries and/or the activities of subcontractors or suppliers with which Danone has an established business relationship, when these activities are related to this relationship.;
- (e) A breach of, any other Compliance Policies, internal rules or any non-ethical conduct.

Facts, information, or documents covered by national security, confidential medical information or confidential relations between lawyers and their clients (attorney-client privilege) should not be the subject of an alert under this scheme.

Concerns must be made in good faith and in accordance with applicable laws. Raising a concern in good faith will not expose the person who raised it (the “**Reporter**”) to any retaliatory action, even if it is unsubstantiated, inaccurate or not further processed. Any concern raised in bad faith may result in disciplinary actions as per the Danone Disciplinary Code for Business Conduct Breach.

Any person who raises a concern is invited to review the [DANONE ETHICS LINE WHISTLEBLOWING STATEMENT](#) which describes in detail what happens when a concern is received and how it is managed by Danone.

2. PURPOSE OF THE DATA PROCESSING AND LEGAL BASIS

The personal data collected in the receipt, management and investigation of a concern is processed by Danone to ensure its proper management, and in particular to (i) determine whether or not a Wrongdoing has occurred, (ii) determine the relevant sanctions and any mitigating measures to put in place to prevent future Wrongdoings, and (iii) perform statistics and reporting.

The processing mentioned above is based on Danone’s legal obligation to comply with the French Law no. 2016-1691 (known as the “*Sapin II*” law) and the Law no. 2017-399 (known as “Law on the duty of care”), as well as on Danone’s legitimate interest to ensure safety and compliance with our ethical rules.

3. NATURE OF THE PERSONAL DATA COLLECTED

Danone upholds the strictest protection of personal data collected and is committed to, in all cases, comply with the data protection principles, including but not limited to, the data minimization principle as well with the data protection laws and regulations of the countries in which we operate.

When receiving a concern, Danone may collect some personal data from a Reporter such his/her name and/or e-mail address if Reporters choose to voluntarily disclose this information.

If permitted under applicable local laws, Reporters may choose to remain anonymous (regardless of the channel used to raise the concern), although this is not encouraged as it makes it difficult to conduct a thorough investigation. Notwithstanding, it is possible to open an anonymous line of communication in the DEL.

In those countries' where national laws require the disclosure of the Reporter’s name as a condition for reporting on specific topics via the DEL, Reporters unwilling to disclose their identity will be unable to use the DEL.

For the analysis and management of the concern, the following information may be processed:

- Identity, functions and contact details of the Reporter (unless he/she wishes to remain anonymous, provided this is permitted under applicable law);
- 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 and any documents or data voluntarily provided by the Reporter;
- Information obtained in the course of the investigation of the facts reported;
- Record/summary of the investigation process;
- Actions taken following the investigation.

Depending on the nature of the concern, the Reporter may also provide personal data that could be considered as sensitive personal information, such as data that reveal or relate to medical/health status, ethnic origin, religion, sexual orientation, political opinions and/or trade union membership. If the Reporter provides such sensitive personal data, Danone will process it as necessary for carrying out its legal obligations or establishing, exercising or defending legal claims.

In all cases, the Reporter must ensure that all the information he/she provides is factual and directly related to the subject matter of his/her concern.

4. RECIPIENTS OF THE PERSONAL DATA

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

In all cases, only a very limited number of Danone employees have access to the data communicated or collected for the management of a concern (i.e. only the members of the corporate and/or local compliance or human resources teams that are directly responsible for investigating the concern and the members of the Danone Ethics Line Committee and, if applicable, those senior business leaders directly involved in making a decision on the actions to be taken), and all information is always treated with the strictest confidentiality.

Danone may provide (or otherwise make available) data related to a reported concern or investigation to trusted third parties on its behalf (e.g. companies owned and operated, directly or indirectly by Danone, external consultants, auditors). Danone only communicates data to the extent necessary for these third parties to handle the reported concern, investigation or to take appropriate measures. These persons are bound by a strict confidentiality obligation.

When so required by law or by a legal order, Danone may also disclose the data to public authorities or competent jurisdictions to comply with applicable laws and regulations.

Throughout the investigation process, Danone 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 shared without the Reporter's consent and the identity of the person targeted by the concern will only be shared 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 legal obligations or legal authorities, Danone may share the identity of the Reporter without his/her consent as well as the identity of any persons targeted by the concern.

Additionally, the personal data described in this Privacy Statement may be processed on behalf of Danone by the trusted third-party service providers who assist us and help us provide IT services such as platform providers (e.g. DEL), hosting services, maintenance and technical support services for our software and applications.

5. DATA TRANSFERS

Danone operates internationally. The personal data relating to a concern could therefore be transferred internationally in the countries where Danone entities or delegated third parties are established and/or operate

Danone will take all appropriate measures to ensure that recipients protect personal data adequately, such as:

- a) ensuring that there is an adequacy decision by the European Commission in the case of transfers out of the EEA or by the UK Government in the case of transfers out of the UK;
- b) having in place standard model contractual arrangements with the recipient which have been approved by the European Commission (or the UK Government for transfers out of the UK in due course);
- c) any other safeguarding mechanism permitted by law.

6. DATA RETENTION PERIOD

We keep your personal data for no longer than necessary for the purposes for which the personal data is processed. The length of time for which we retain personal data depends on the purposes for which we collect and use it, for the duration of your contractual relation with us and/or as required to comply with applicable laws and regulations as well as to establish, exercise or defend our legal rights.

For example, personal data relating to a concern that is considered as not falling within the scope of subjects included in Section 1. above (for example a product inquiry) will be destroyed or anonymized for statistical purposes without delay.

7. DATA SUBJECTS' RIGHTS

Where we process your personal data, you are entitled to a number of rights under the relevant applicable laws and you can exercise these rights at any point. We have provided an overview of these rights below.

We will consider all such requests and, in accordance with the applicable laws, will provide our response within a reasonable period, or within the period prescribed by law. Please note, however, that we may rely on certain exemptions to complying with your requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims. If an exemption applies, we will tell you this when responding to your request.

We may request you to provide us with information necessary to confirm your identity before responding to any request you make.

- **The right of access:** You have the right to obtain (i) confirmation as to whether personal data concerning you is processed or not and, if processed, to obtain (ii) access to such data and a copy thereof. However, the exercise of this right must not infringe, among others, the rights and freedoms of third parties (including trade secrets, proprietary information or intellectual property). The person who is targeted by an alert may under no circumstances obtain from Danone, on the basis of his or her right of access, information concerning the identity of the Reporter or of any other person involved in the investigation.
- **The right to rectification:** You have the right to obtain the rectification of inaccurate personal data concerning you. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement. This right should not, however, allow the data subject to retroactively modify elements contained in the alert or collected during its investigation.
- **The right to erasure:** In some cases, you have the right to obtain the erasure of personal data concerning you. However, this is not an absolute right and Danone SA may have legal or legitimate grounds for keeping such data.
- **The right to restrict processing:** In some cases, you have the right to obtain restriction of the processing of your personal data.
- **The right to object to processing:** You have the right to object, at any time, to processing of personal data concerning you when such processing is based on the legitimate interest of Danone SA (see section 2 above). Danone SA may, however, invoke compelling legitimate grounds for continued processing.
- **The right to lodge a complaint with the competent supervisory authority:** You have the right to contact your supervisory authority (e.g. the CNIL in France) to complain about Danone SA's personal data protection practices.
- **A right to give instructions concerning the use of their data after death:** You have the right to give Danone SA instructions concerning the use of your personal data after death.

To exercise these rights, the data subjects can contact the Danone DPO at dpo.group@danone.com.

8. COOKIES

When using the DEL, a text file (called "session cookie") is saved on Reporter's computer. It contains only the number of Reporter's session.

This cookie is a "session cookie" and is necessary for technical reasons to establish the connection to a security-certified server. It does not damage the Reporter's computer, it does not access the Reporter's data, and it has no relation to the content of a report. When Reporters close all browser windows after submitting their report, this "session cookie" will expire and will be automatically deleted.