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VERSION 06	Update – Incorporation of whistleblowing platform – Role of the Ethics Committee and Sponsor Committee – Clear wording	31/12/2024			
VERSION 05	New Logo – “Sexual harassment and sexist behaviour” officer - Title	31/10/2022	AFU	ELD	LGH
VERSION 04	Update - Updates to paragraphs	16/09/2022			
VERSION 03	Update to the role of the Group's Ethics & Compliance Manager and Director of Legal Affairs, Ethics & Compliance	30/11/2020			
VERSION 02	Update to the terms of the “Ethics & Compliance Manager”	19/11/2020			
			BY	CHECKED	APPROVED


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The GTT Group is committed to promoting honest individual and collective behaviour, consistent with its values and the stipulations of its Ethics Charter.

The GTT Group encourages the reporting of behaviour contrary to the Ethics Charter and this within the applicable regulatory framework, in particular Law no. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life (known as the ‘Sapin II Law’), as amended by Law no. 2022-217 of 21 February 2022 aimed at improving the protection of whistleblowers (known as the ‘Waserman Law’), and Decree no. 2022-1284 of 3 October 2022 on the procedures for collecting and processing whistleblower reports.

This procedure defines the system for collecting and handling whistleblowing reports (the “**System**”) within GTT and the entities it controls (the “**Group**”).

Specific local regulations may apply within the Group's subsidiaries or entities located outside France. In these subsidiaries or entities, the System remains applicable, taking into account local legal specificities. These are detailed in Appendix 1 (for China) and 2 (for Korea).

For any questions regarding the specificities applicable to a particular jurisdiction, you can contact the Compliance correspondent of your subsidiary or entity or the Group Compliance Officer.

1. Purpose of the whistleblowing system


The purpose of this System is to enable Group employees and all external partners and other stakeholders, regardless of their geographical location, to report any event or information involving a breach of applicable laws and regulations, the standards and principles set out in the Group’s Ethics Charter, and/or any of the Group’s internal procedures.

The System is part of the Group’s approach to ethics. It provides an additional channel of expression for Group employees and other stakeholders, so that everyone can play their role in ethics and risk prevention. It ensures that any whistleblowing is dealt with impartially and diligently.

Its use is optional. No penalty may be imposed on an employee for failing to use the System.

To encourage whistleblowing, this System is based on the following key principles:

- Protecting the **confidentiality** of the identity of the whistleblower;
- Protecting the **presumption of innocence** of the subject of the whistleblowing report;
- Keeping the whistleblower **informed**;
- **Protecting** a whistleblower who acts in good faith and meets the conditions set out in Article 6 of the Sapin II Law, against any form of retaliation, reprisal or threat of reprisal on the part of the Group, even if it subsequently turns out that the whistleblowing report was unfounded;
- The perpetrator of any form of retaliation, reprisal or threat of reprisal, or any malicious, defamatory or slanderous disclosure will be liable **to disciplinary action** up to and including dismissal, in accordance with applicable law;
- Protecting **personal data**.

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2. Beneficiaries of the System

2.1. Identified beneficiaries

The System is open to all Group employees as well as to its business partners, whether individuals or legal entities (external employees, service providers, subcontractors, suppliers, etc.), or more generally any Group stakeholder, in particular:

- current or former employees of the Group, where the information was obtained in the context of that past employment relationship,
- candidates for recruitment, where the information was obtained in the context of this application,
- external or occasional employees of the Group (paid or unpaid trainees, work-study students, consultants, etc.),
- shareholders or associates and holders of voting rights at the GTT General Meeting,
- members of GTT's administrative, management or supervisory bodies,
- GTT's co-contractors, sub-contractors or, in the case of legal entities, members of their administrative, management or supervisory bodies and members of their staff,

who have obtained the reported information in the course of their professional activities.

2.2. Cases of anonymous reports

Whistleblowers may decide not to disclose their identity and to submit an anonymous report. However, this anonymity could make it impossible to carry out an investigation, and the whistleblower will be notified accordingly. (see section 7). The conditions governing the admissibility of an anonymous report are set out below (see section 4).

The Group encourages whistleblowers to identify themselves in order to facilitate exchanges while guaranteeing the confidentiality of information, as set out below (see section 3). In addition, by law, anonymous whistleblowers who wish to reveal their identity after the fact benefit from the same guarantees of confidentiality and legal protection as any whistleblower.


To submit an anonymous report, see section 6.

3. Confidentiality and protection of the whistleblower

The whistleblower benefits from the guarantees and protection measures associated with whistleblower status under the applicable regulations, as set out below.

These guarantees and protection measures also apply to:

- to facilitators, i.e. any natural or legal person under private non-profit law who helps a whistleblower to make a report or disclosure;
- natural persons who have a relationship with the whistleblower and who are at risk of reprisals in the course of their professional activities, such as colleagues or relatives of whistleblowers;
- to legal entities controlled by the whistleblower or for which he or she works, or with which he or she has a professional relationship.

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Confidentiality: The procedure guarantees the strict confidentiality of the identity of the whistleblower, of the persons concerned by the report and of any third party mentioned in the report, as well as of the information gathered by the addressee of the report. Information that could identify the person who issued the report may only be disclosed with that person's consent. It may, however, be communicated to the judicial authorities in cases where the Group would be obliged to report the facts to them. The whistleblower is then notified, with written explanations, unless there is a risk that this information could compromise the legal proceedings.

Information identifying the person who is the subject of a report may only be disclosed, except to the judicial authorities, once it has been established that the report is well-founded.

Members of the Ethics Committee and of the Sponsor Committee, as well as any person involved or consulted in the processing of a report, are bound by this obligation of strict confidentiality. To this end, the members of the Committees and any person involved or consulted in the processing of a report sign an enhanced confidentiality agreement. Violation of this confidentiality obligation may result in criminal penalties.

Any person involved or consulted when handling a whistleblowing report will be bound by an obligation of strict confidentiality with regard to the identity of the whistleblower, the facts mentioned in the report, the identity of those targeted by the report, and the information gathered by all recipients of the report. A breach of this confidentiality requirement may result in criminal penalties.

Protection: No disciplinary or retaliatory action may be taken against the whistleblower as a result of disinterested use of the System in good faith. In particular, the whistleblower may not be subjected to the following measures¹: suspension, lay-off, dismissal or equivalent measures; demotion; transfer of duties, change of workplace, reduction in salary, change in working hours; coercion, intimidation, harassment or ostracism; non-conversion of a fixed-term employment contract or a temporary contract into a permanent contract when the employee could legitimately expect to be offered a permanent job; non-renewal or early termination of a fixed-term employment contract or a temporary contract.

However, misuse of the System (false allegations, intention to harm the person who is the subject of a report) may expose the perpetrator to disciplinary sanctions, up to and including dismissal in accordance with applicable law, as well as legal proceedings.

4. Admissibility of whistleblowing reports


To be admissible, whistleblowing reports must meet the following conditions:

Whistleblower status: the report must come from a whistleblower as defined in Article 6 of the Sapin II Law. Under the terms of this law, a **whistleblower** is any natural person who reports or discloses, **without direct financial consideration and in good faith**, information relating to a crime, an offence, a threat or harm to the general interest, a violation or an attempt to conceal a legal or regulatory violation applicable to the Group.

Authentication: use of the System is reserved for the Beneficiaries identified in section 2. Users must be in a position to provide information that enables them to be identified and to ensure that they fall within the categories of Beneficiaries. By way of exception, an anonymous report is permitted if the whistleblowing report provides sufficient details to establish the seriousness of the acts in question.

¹ Exhaustive listing of measures available in article 10-1 of the Sapin II Law.

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Good faith: users of the System must act without direct financial consideration and in good faith. They must have reasonable grounds for believing that the information revealed about breaches was true at the time they took place. As such, the facts reported must be presented objectively and precisely, and substantiated as far as possible.

4.1. Issues that can be reported

The report may relate to facts likely to constitute a crime or an offence, a violation or an attempt to conceal a violation of an international commitment duly ratified by France, an unilateral act of an international organisation taken on the basis of such a commitment, the European Union law, the law or regulations and/or, more generally, of the Ethics Charter or of an internal Group procedure. This includes in particular:


- corruption and influence peddling;
- conflicts of interest;
- anti-competitive practices,
- human rights;
- business relations;
- management practices (harassment, discrimination, exploitation, etc.);
- environmental protection;
- money laundering and financing of terrorism;
- protection of intellectual property;
- privacy and data security breaches;
- non-compliance with international economic sanctions and export control regulations.

Where the information was not obtained in the course of professional duties, the whistleblower must have had personal knowledge of it.

Only the facts and circumstances explicitly mentioned in the whistleblowing report can be dealt with.

4.2. Issues excluded from the whistleblowing procedure

Facts, information or documents, regardless of their form or medium, where their revelation or disclosure is prohibited by provisions relating to national defence secrecy, medical secrecy, the secrecy of judicial deliberations, the secrecy of investigations or judicial enquiries, or the secrecy of lawyer-client relations, may not be the subject of a whistleblowing report.

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5. Subject(s) of a whistleblowing report

Anyone who is the subject of a whistleblowing report is presumed innocent until the facts have been established by a court decision.

To guarantee the rights of subjects of whistleblowing reports, the Ethics Committee will ensure that subjects of whistleblowing reports are notified as soon as possible. By way of exception, and in view of the specific nature of the System, the persons implicated by a whistleblowing report may not have access to the identity of the author of a report.

Where precautionary measures are necessary, in particular to avoid possible destruction of evidence relating to the whistleblowing report, the subject of the report may be notified after a delay.

6. Submission of a whistleblowing report

The Group invites whistleblowers to contact the Ethics Committee directly, preferably in writing, using one of the following ways:

- Submit a confidential whistleblowing report online using the platform managed by the external service provider EQS Integrity Line, available at the following address: <https://gtt.integrityline.fr/?lang=en>
- Send a letter marked “confidential” to the Group Compliance Officer, Chair of the Ethics Committee, who will act as contact person on behalf of the Ethics Committee:

GTT
À l’attention du Group Compliance Officer, Président du Comité d’Ethique
1, route de Versailles
78470 Saint-Rémy-lès-Chevreuse
France

- Send an email marked “confidential” to the Ethics Committee at the following email address: ethics@gtt.fr


All of these channels are secure and guarantee the strict confidentiality of the whistleblowing report, the facts it mentions, the people it targets, and the data collected by its recipients.

To enable the Ethics Committee to deal with reports diligently and effectively, whistleblowers are asked to provide the most objective and detailed description of the facts that they can. This may be accompanied by supporting documents, in any form or medium, to back up the report if available.

To deal with the report, it is preferable for whistleblowers to make themselves known to the Ethics Committee, bearing in mind that their identity will be kept strictly confidential (see section 3). In this case, the Ethics Committee may, where appropriate, keep whistleblowers informed of progress in dealing with the report and, with their agreement and if it proves useful, involve them in the audit process.

In the event of an anonymous report, it is recommended to use the EQS Integrity Line platform, which provides a messaging system enabling the whistleblower to communicate with the Ethics Committee in complete confidentiality and anonymity.

To ensure that reports are handled more effectively, it is preferable to use the EQS Integrity Line platform.

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7. Handling whistleblowing reports

The System is implemented and monitored at Group level by two committees:

The **Ethics Committee** is responsible for the proper application of this procedure. It receives whistleblowing reports (see section 6) and is the administrator of the outsourced platform for reception and handling of whistleblowing reports. It is made up of four permanent members who are not members of the Executive Committee: one representative from the Human Resources, one representative from Finance and one representative from the Legal department and the Group Compliance Officer, who chairs the committee. In this capacity, each of its member is independent.

The role of the **Sponsor Committee** is to validate the action plans and recommendations made by the Ethics Committee and, where appropriate, to bring them to the attention of General Management, the Executive Committee and/or the Board of Directors, depending on the nature of the facts reported and the potential impact on the Group. It has three permanent members, all of whom sit on the Executive Committee: General Secretariat, Finance and Human Resources. In this capacity, each of its member is independent.

Committee members carry out their duties impartially and have the necessary skills, authority and resources to receive and process reports and carry out checks.

Committee members are bound by an obligation of strict confidentiality.

Each year, they sign an undertaking to declare any situation of conflict of interest and to refrain from dealing with reports that could place them in a situation of conflict of interest, in order to guarantee the impartiality of the processing of reports.

7.1.Receipt of the whistleblowing report


All whistleblowing reports, regardless of the channel used, are sent to and dealt with by the Ethics Committee, under the supervision of the Sponsor Committee.

If contact details of the whistleblower are known, the Ethics Committee will acknowledge receipt of the whistleblowing report within seven (7) days, via the dedicated EQS platform, by email or by personal letter to the whistleblower. The personalised acknowledgement of receipt also specifies the reasonable and foreseeable time needed to deal with the report. It does not mean that the whistleblowing report is admissible.

The Ethics Committee designates one of its members to deal with the whistleblowing report, maintain communication with the whistleblower and, if necessary, request further information from them and inform them of the follow-up to the report.

Within a reasonable time of receiving the whistleblowing report, the Ethics Committee must:

- Analyse the report and decide whether or not it is admissible on the basis of the information provided;
- Decide whether it is necessary to inform the Sponsor Committee, in view of the nature of the facts reported and the potential impact on the Group;
- Decide on the action to be taken as part of the audit to be carried out with regard to the facts reported, where appropriate in consultation with the Sponsor Committee;
- Decide on the appropriate time to inform the person(s) implicated;

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Within three months of acknowledging receipt of the report, the Ethics Committee shall inform the whistleblower in writing of the action taken in response to his report.

7.2. Admissibility review

All whistleblowing reports received are subject to an admissibility review. This involves checking whether the report meets the definition of whistleblowing in terms of the legal provisions and the System (see section 4). During this phase, additional information may be requested from the whistleblower.

Anonymous reports are admissible provided that they relate to one of the above-mentioned subjects (see section 4.1) and that they contain facts/information that are sufficiently serious and detailed to trigger internal audits. If necessary and possible, the whistleblower will be contacted. If it is not possible to gather the missing information required to continue the audit, the whistleblowing report will be deemed inadmissible and will be closed.

If precautionary measures are necessary to prevent the destruction of evidence, or if preliminary checks are necessary, or measures to protect the whistleblower are required, the whistleblower will be informed of the decision on the admissibility of the report once these measures have been taken.

If, after the preliminary assessment, the Ethics Committee concludes that the whistleblowing report is admissible, it notifies the whistleblower of this within the timeframe and under the conditions described in paragraph 7.1. The whistleblower is also informed of the possibility of communicating with those in charge of the audit and the procedures for communicating with them. The Ethics Committee takes all necessary steps to ensure that the report is dealt with promptly and impartially, in particular by initiating internal audits if necessary.


If the Ethics Committee concludes that the whistleblowing report is inadmissible because it does not comply with the legal conditions set out above, it will notify the whistleblower in writing, stating the reasons for the inadmissibility.

7.3. Internal audit

The Ethics Committee carries out or coordinates internal audits aimed at establishing the existence of alleged breaches and the possible liability of the perpetrators (the "persons implicated").

The person(s) named in the whistleblowing report as witness(es), victims(s) or alleged perpetrator(s) will be notified within a reasonable period of time, which may not exceed one (1) month from submission of the whistleblowing report. However, if informing the persons implicated is likely to hinder internal audits or compromise the gathering of evidence, notification should be delayed and only made once the evidence has been safeguarded or the necessary audits have been carried out. Under no circumstances may the identity of the whistleblower, or any information that could identify them, be communicated to the persons implicated.

The Ethics Committee appoints the persons responsible for conducting internal audits. The internal audits are supervised by a designated member of the Ethics Committee, but other Group employees or external third parties (lawyers, experts, auditors) may be involved, with appropriate guarantees of confidentiality and protection of personal data in each case. The persons in charge of internal audits must be free of any conflict of interest with the persons implicated or the whistleblower. Depending on the nature and potential impact of the whistleblowing report, the Ethics Committee may involve other people (from within or outside the Group) in an audit.

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As part of their audits, the teams or appointed third parties are authorised to:

- Collect and process any data (accounting, banking, IT) that they deem relevant (excluding data for which collection is prohibited) concerning the company or the implicated persons;
- Conduct interviews to enable the persons implicated to respond to the accusations made against them;
- Question any person in order to gather any information needed to verify the accuracy of the alleged facts.

Internal audits are carried out in accordance with the laws in force, in particular those protecting the confidentiality and privacy of the whistleblower, as well as the presumption of innocence.

All necessary checks are thus carried out in strict confidentiality with regard to the whistleblower, the facts reported and the persons concerned. This confidentiality also applies in the event of communication to third parties, where this is necessary solely for the purposes of verifying or dealing with the whistleblowing report.

In the case of reports of sexual harassment and/or sexist behaviour, the Officers appointed by General Management will be notified and involved in the audits.

7.4. Decision on follow-up

On completion of the checks, the persons appointed by the Ethics Committee to carry them out shall present their findings and conclusions to the Ethics Committee.

The Ethics Committee draws up recommendations for consideration by the Sponsor Committee on any follow-up to any breaches, including the following measures in particular:

- Further necessary checks,
- Remedial measures to put an end to the breach,
- Referral to Human Resources and/or line management for disciplinary action if necessary,
- Referral to administrative or judicial authorities, or
- Request for assistance (psychological support, occupational health doctor, labour inspector, etc.).


The Ethics Committee informs the whistleblower in writing of the action taken, at the latest within three (3) months of acknowledgement of receipt of the whistleblowing report.

In addition, and if necessary, the Group will refer the matter to the competent public authorities and/or initiate any proceedings it deems appropriate.

7.5. Case closure and data retention

The Ethics Committee closes a whistleblowing report after archiving the file in accordance with the rules in force:

- Data relating to a whistleblowing report that has been declared inadmissible shall be archived without delay;
- When a report is declared admissible but no action is taken, the data shall be archived within two (2) years of the end of the audit;

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- When disciplinary or legal proceedings are initiated against the person(s) implicated or against an abusive whistleblower, the associated data may be retained until the end of the proceedings or until the time limit for appeals against the disciplinary or legal decision has expired.

The whistleblower and the persons implicated will be notified of the closure of the case by e-mail or by the post.

8. Personal data protection

Personal information and data is collected and processed under this system in accordance with the applicable personal data protection regulations.

8.1. Data subjects and personal data

a. Data subjects

- Employees of the entity concerned, regardless of their legal employment status. Employees include all salaried staff, agents, temporary staff, trainees, employees seconded by a third party, volunteers, etc.;
- Employees, customers and suppliers external to the entity, when they are natural persons with a direct contractual link with the entity (consultants, agents, advisers, subcontractors who are natural persons with self-employed status, etc.);
- The workforce (employees, partners, managers, etc.) of legal entities that have a contractual link with the entity concerned;
- Anyone whose personal data is actually processed as part of the System.

b. Personal data


The categories of personal data listed below may be processed as part of the System:

- For natural persons (whistleblower, persons implicated, people dealing with the report): Identity (title, full name), job position and contact details (phone number, email address);
- Reported facts;
- Information gathered as part of the audit into the reported facts;
- Audit reports of operations;
- Follow-up to the whistleblowing report.

Sensitive data is not processed and can only be mentioned if it is unrelated to the facts contained in a whistleblowing report, except in exceptional cases specified in the applicable regulations of each country.

8.2. Data recipients and subcontractor

The recipients of data relating to the whistleblowing procedure are the Group Ethics Committee and the Group departments or entities concerned by the whistleblowing procedure, including those located outside the European Union.

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The procedure for collecting and handling whistleblowing reports is based on an external platform, managed by a subcontractor (<https://www.eqs.com/fr/a-propos-deqs/protection-des-donnees/>) for the Group as a whole, bound by the same obligations to guarantee the integrity and confidentiality of the information collected in a report.

8.3. Security of personal data and exercise of rights

The security of personal data collected under the System is ensured by the segmentation of databases on dedicated servers and by encryption.

Anyone whose personal data is collected and processed as part of the System has the right to access, rectify and object to the processing of their data, for reasons relating to their particular situation and insofar as processing is not required by law.

These rights may be exercised by contacting the Data Protection Officer:

- By post:
A l'attention du Data Protection Officer
1, route de Versailles
78470 Saint-Rémy-lès-Chevreuse
France
- By email: dpo@gtt.fr

You can then lodge a complaint online with your national data protection authority (e.g. the CNIL in France).


9. System implementation procedure

This procedure will come into force after consultation with the employee representative bodies and will be recorded in the Data Processing Register, together with an impact analysis in accordance with the French Data Protection Act and the recommendations of the CNIL, where applicable.

10. Whistleblowing to a judicial or administrative authority

The whistleblower is free to choose the channel for internal or external reporting to the appropriate judicial or administrative authorities. For any question regarding these authorities, you can contact the Group Compliance Officer.

The Group encourages its employees and other external stakeholders to use internal reporting channels so that corrective measures can be implemented quickly and effectively, while maintaining strict confidentiality.

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Appendix 1 – Jurisdiction specific – People’s Republic of China

As far as data subjects within the territory of PRC and/or GTT entities in China are concerned, the below shall be noted regarding how personal information will be dealt with pursuant to the *PRC Personal Information Protection Law* (“PIPL”).

I. Key principles and definitions


- (a) “Personal Information” (“PI”) is the term used by PRC laws instead of personal data. PI under PIPL means all kinds of information recorded by electronic or otherwise that relates to an identified or identifiable natural person, excluding anonymized information. Typical examples of PI include but are not limited to natural persons’ names, occupation, title, workplace, work experience, dates of birth, ID number, biometric information, residence and telephone numbers, email, health information, and tracking information.
- (b) “Sensitive PI” under PIPL refers to PI that, if leaked or illegally used, could easily result in infringement of a natural person’s dignity or endangering of personal/proprietary security, including but not limited to biometric information, religious belief, special identity, medical and health information, financial account, tracking and whereabouts, information of minors below the age of 14.
- (c) “Important Data” under the PRC laws regime refers to the data that, if tampered with, destroyed, leaked, or illegally obtained or used, may directly endanger national security, economic operations, social stability, public health, and safety.
- (d) There is no concept of data controller under PIPL. With the wide definition of processing, this generally means all legal obligation under PIPL will fall upon the shoulder of a data processor while there is no differentiation between obligations of a data controller and a data processor.
- (e) “Processing” is defined by PIPL to include actions such as collection, storing, use, refinery, transmission, provision, publishing and deletion.

II. Retention period

Despite the terms specified under article 7.5 above in the WHISTLEBLOWING RECEPTION AND HANDLING PROCEDURE (“**Main Policy**”) regarding data retention, the PI of data subjects in PRC will be stored only for the shortest necessary period of time to handle the reported matter.

III. Export/processing of PI and legal basis

According to article 6 of the Main Policy, regardless of whether the whistleblowing reports are made through third-party platforms (i.e. EQS Integrity Line via <https://gtt.integrityline.fr/?lang=en>), letter, or email, the whistleblowing reports will be encrypted and transmitted for processing (including storage) outside of China. **Therefore, if the whistleblowers decide to report via the aforementioned channels, it shall be deemed that they have clearly understood and irrevocably consented to the consequences of reporting via such channels, which will result in (a) data (including PI) contained in the whistleblowing reports being exported abroad (outside of PRC); and (b) such exported PI will then be processed by overseas recipients in accordance with the purposes and methods provided in article 7 of the Main Policy.** In the event of transferring the exported PI to third parties, please refer to section V below for details.

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If the PI of any third parties is essential and indispensable to the facts being reported under the System and the whistleblowers wish to include such PI of third parties into the whistleblowing reports, such PI shall be anonymized by the whistleblowers for further assessment by the Ethics Committee in accordance with applicable PRC laws and regulations. No PI of third parties shall be disclosed under the System until the Ethics Committee has informed the whistleblowers with an appropriate measure to further investigate the reported issue pursuant to the PIPL and other relevant laws and regulations of the PRC laws.

IV. Exclusion of data

- Sensitive PI: as processing of Sensitive PI is only allowed for specific purpose with sufficient necessity and shall be subject to strict security measures under PRC laws, the Sensitive PI of neither the whistleblowers themselves nor any third parties (e.g. the subjects of the whistleblowing reports) shall be provided under the System.
- Important Data: the whistleblowers shall not provide any Important Data or data that is prohibited or restricted from being transferred overseas by applicable PRC laws and regulations, including but not limited to the *Cybersecurity Law*, the *Data Security Law*, and the national standard *GB/T 43697-2024 "Data Security Technology – Rules for Data Classification and Grading"*. However, if the important data (if any) is essential and indispensable to the facts being reported under the System, the whistleblowers shall, without disclosing the important data itself, indicate the existence of such important data in the whistleblowing reports to be further assessed by the Ethics Committee in accordance with applicable PRC laws and regulations.

V. Intended third party transfer

As far as PRC is concerned where the Ethics Committee needs to transmit PI to others (e.g. external third parties such as lawyers, experts, auditors), notably in order to conduct verifications on the allegations mentioned in the report, the data subjects will be informed about

- name and contact of the recipient,
- purpose of processing,
- method of processing, and
- categories of PI to be transmitted.

A separate consent to this effect shall be secured from the data subjects. The recipient shall be obliged to process the received PI within the scope and in the way as disclosed above. Any change of the above disclosed processing purpose or method of processing shall require a new consent from the data subjects.


VI. Existing rights of the data subjects

PIPL grants extensive rights to data subjects to control and oversee the use of their PI, including but not limited to:


- right to be informed, to decide, to restrict and to decline (art. 44);
- right of access and data portability (art. 45);
- right to rectification and supplementation (art. 46);
- right to erasure (art. 47);
- right for explanation of privacy rules (art. 48);
- right related to automated decision making (art. 24);
- right to withdraw consent at any time (art. 15); and
- right to lodge a complaint with a supervisory authority (art. 65).

VII. Confidentiality

All information in a whistleblowing report, including the identity of the whistleblowers or the identity of other persons involved in an inquiry or investigation, shall only be disclosed to those functions within the Group (e.g. members of the Ethics Committee and of the Sponsor Committee) or outside the Group (e.g. forensic auditors

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and external legal counsels) on a strict need-to-know-basis. This means that information in a whistleblowing report will only be shared with those who require this information in order to ensure compliance under the System and with legal or regulatory obligations, or as input for subsequent judicial proceedings. Depending on the purpose of sharing, the Ethics Committee may (further) anonymize the information prior to sharing it. During an investigation, the Group will comply with the privacy rules and applicable PRC laws and regulations, including PIPL to the extent an investigation includes processing of personal data.

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Appendix 2 – Jurisdiction specific – Korea

I. Application of Korean Laws

In cases where Korean regulations are applicable, the Whistleblowing Reception and Handling Procedure (this “**Procedure**”) applies only within the scope that does not violate Korean laws, such as the Public Interest Reporter Protection Act (the “**Whistleblower Act**”). In cases where any provision of this Procedure violates Korean laws, such as the Whistleblower Act, Labor Standards Act, and Act on Gender Equal Opportunity and Support for Work-Family Balance, Korean laws shall take precedence.

II. Issues that can be reported

The reports subject to this Procedure include violations of the public interest under the Whistleblower Act. Any violation of the public interest refers to violations of the 491 laws and regulations specified by the Whistleblower Act (this may change due to amendments to the Whistleblower Act), which infringe upon the health and safety of the public, the environment, consumer interests, fair competition, or other similar public interests, such as :

- Fair Transactions in Franchise Businesses Act,
- Security Services Industry Act,
- Traffic Safety Act,
- Sexual Violence Prevention and Victims Protection Act,
- Special Cases Concerning the Punishment, etc. of Sexual Crimes Act,
- Labor Standard Act,
- Personal Information Protection Act.

III. Confidentiality and protection of the Whistleblower, etc.

No one shall disclose, report, or make public the following information to others without the consent of (i) the whistleblower or (ii) anyone (other than whistleblower) who has made a statement, testimony, or provided materials during the investigation, audit, or lawsuit regarding the public interest violation report or protective measures for whistleblower (hereinafter referred to as “Whistleblower, etc.”):

- Personal information of the Whistleblower, etc. such as their name, photo, resident registration number, phone number, address, workplace, etc.
- Any information that could lead to the identification of a person as a Whistleblower, etc.

The details of the report as well as the personal information of the person subject of a report, must not be disclosed until a public interest violation is found as a result of the investigation or audit.


IV. Prohibition of retaliation or disadvantageous action

No one shall impose any disadvantageous measures on a Whistleblower, etc., for the reason that they have made a public interest report or have provided a statement, testimony, or materials during the investigation, audit, or lawsuit regarding the public interest violation report or protection measures for whistleblower.

No one shall obstruct a Whistleblower, etc. from making a report or providing a statement, testimony, or materials, or coerce them into revoking their report, statement, testimony, or provision of materials during the investigation, audit, or lawsuit regarding the public interest violation report or protection measures for whistleblower.

V. Special provisions on workplace harassment reporting

If any person becomes aware of the fact that workplace harassment has occurred, he/she may report the fact. When the Group receives a report or becomes aware of allegations that workplace harassment has occurred, the Group shall immediately conduct an objective investigation to verify whether workplace harassment has occurred.

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During the investigation, if necessary to protect an employee who suffered workplace harassment or who alleges that he/she suffered such harassment (a **“harassed employee, etc.”**), the Group shall take adequate measures such as change of workplace or paid leave, but not against the will of the harassed employee, etc.

If the investigation finds that workplace harassment has occurred, upon the request of the harassed employee, the Group shall take appropriate protective measures such as change of workplace, role change, or paid leave.

If the investigation finds that workplace harassment has occurred, the Group shall immediately take necessary measures against the person who has committed workplace harassment, such as disciplinary action or assigning the perpetrator to another workplace. In such cases, before taking action, the Group should listen to the opinion of the harassed employee regarding measures such as disciplinary action.

The Group should not dismiss or impose any disadvantageous treatment on an employee who reports the occurrence of workplace harassment, or a harassed employee, etc., on the basis of his/her report of workplace harassment.

A person who has investigated a workplace harassment report, a person who has been informed of such investigation and any other person who participates in such investigation process shall not disclose the confidential information obtained during such investigation to others against the wishes of the harassed employee, etc.; provided that this shall not apply to cases where the matters relating to the investigation is being reported to the Group or necessary information is being provided at the request of a relevant official authorities.


VI. Special provisions on workplace sexual harassment reporting

If any person becomes aware of the fact that sexual harassment has occurred in the workplace, he/she may report the fact to the Group. When the Group receives a report or becomes aware of the fact that sexual harassment has occurred in the workplace, the Group shall immediately conduct an investigation to verify whether sexual harassment has occurred in the workplace. In such cases, the Group shall ensure that the employee who suffered sexual harassment in the workplace or the employee who alleges that he/she suffered such harassment (a **“sexually harassed employee, etc.”**) does not feel humiliated or offended in the course of any investigation.

During the investigation, if necessary to protect the sexually harassed employee, etc., the Group shall take adequate measures such as a change of workplace or paid leave, but not against the will of the sexually harassed employee, etc.

If the investigation finds that sexual harassment has occurred in the workplace, upon the request of the sexually harassed employee, the Group shall take appropriate protective measures such as change of workplace, role change, or paid leave. If the investigation finds that sexual harassment has occurred in the workplace, the Group shall immediately take necessary measures against the person who has committed sexual harassment at the workplace, such as disciplinary action or changing the place where the perpetrator works. In such cases, the Group shall listen to the opinion of the sexually harassed employee beforehand on measures such as disciplinary action.

The Group should not dismiss or impose any disadvantageous treatment on an employee who reports the occurrence of workplace sexual harassment, or a sexually harassed employee, etc., on the basis of his/her report of workplace harassment.

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A person who has investigated a workplace sexual harassment report, a person who has been informed of such investigation and any other person who participates in such investigation process shall not disclose the confidential information obtained during such investigation to others against the wishes of the sexually harassed employee, etc.; provided that this shall not apply to cases where the matters relating to the investigation is being reported to the Group or necessary information is being provided at the request of a relevant official authorities.

VII. Data privacy

Matters related to personal information are subject to the application of the Personal Information Protection Act ("PIPA").

When a whistleblower submits a report, including personal information of themselves and the reported party, the personal data will be directly collected by the GTT Group through the system. The GTT Group will collect the personal data of the reporter and the reported party based on the consent of the data subject (Article 15 (1), item 1 of the PIPA) or base on the principle of the legitimate interest of the Group (Article 15 (1) item 6 of the PIPA). The Group does not process any sensitive personal information of Korean data subjects through the system.