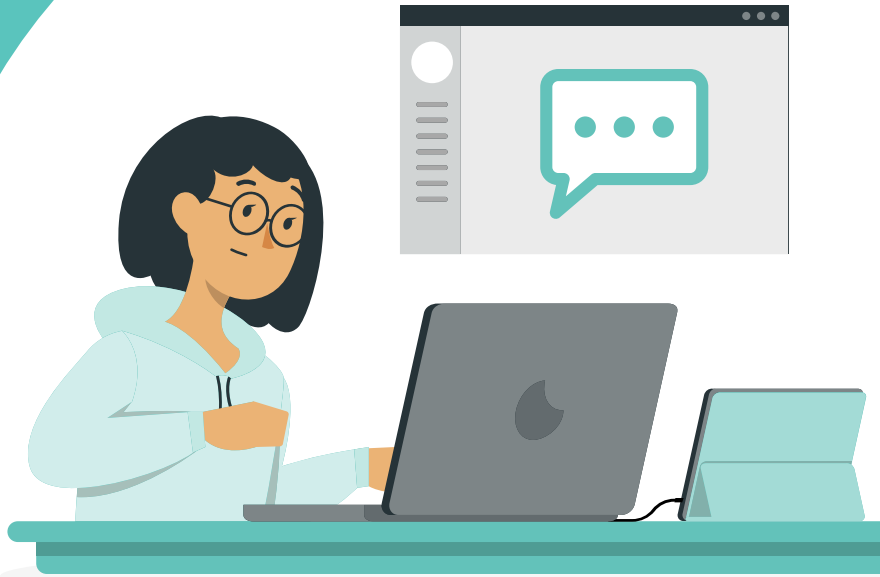


Whistleblower policy

RATP DEV USA



1. WHEN ISSUING AN ALERT?

Whistleblowing is the disclosure of information that appears to be a wrongdoing or abuse in the workplace. You could use the whistleblowing system:

if you are a victim

OR

a witness to facts/events that you believe to be contrary to/in violation to the regulations or to the principles set forth in the Code of Ethics and/or the Code of Business Conduct and Prevention of Corruption.

The whistleblowing system is optional. It is an alternative offered to employees and workers in addition to the usual communication methods and channels used by employees (direct or indirect supervisor, Human Resources Department, management representatives, etc.). The use of these usual channels should be preferred.

The use of the whistleblowing system may be particularly appropriate if the use of the communication channels referred to above presents difficulties or if the issuer of the alert considers that the alert reported may not give rise to an appropriate follow-up.

This guide is not a grievance procedure. An employee who has a concern principally about the way they are being treated as an individual at work should follow the grievance procedure instead.

2. ACT THAT CAN BE THE SUBJECT OF AN ALERT

The whistleblowing system set up by RATP Dev allows you to issue an alert relating to:

- a crime or criminal offence,
- a breach or attempts to conceal a breach of any applicable laws and regulations,
- a threat or prejudice to public interest,
- a serious breach of human rights and fundamental freedoms, the health and safety of persons or the environment resulting from the activity of RATP Développement and the companies its controls, as well as from the activity of subcontractors or suppliers where such activity is linked to their commercial relationship with RATP Dev,
- a breach of the Code of Ethics and/or the Code of Business Conduct and Prevention of Corruption.

For example, the following acts fall within the scope of the whistleblowing system:

- breaches of financial, accounting, banking or anti-corruption regulations,
- anti-competitive practices,
- conflicts of interest,
- discrimination, harassment at work,
- serious breaches of health, hygiene and safety regulations at work,
- serious environmental damages,
- a manager demanding sex from an employee,
- a manager taking his family out to dinner using company funds,
- an Employee selling parts and reporting the parts as stolen,
- employees concealing a fuel spill,
- a manager making racist or sexist comments,
- a manager concealing unethical behavior such as falsifying government reporting.

This list is not exhaustive.

Under no circumstances can an alert relate to acts covered by professional secrecy (national defence secrecy, medical secrecy, investigation secrecy or judicial proceedings and solicitor/client privilege).

3. HOW TO ISSUE AN ALERT?

Reporting through the usual channels

You can issue an alert through the usual communication and reporting channels (direct or indirect supervisor, Human Resources Department, management representatives, etc.).

OR

Alerting via the digital platform

You can issue an alert through the whistleblowing system (digital platform) accessible from this QR code and this URL:

The alert issuer will then be informed of the action taken through the digital platform.



<https://ratpdev.whispli.com/alert>

The alerts issued through the whistleblowing system (digital platform) are received by the RATP Dev's Compliance and Ethics Committee (hereafter the "CEC") which is comprised of the following*:

- RATP Dev's Human Resources Director,
- RATP Dev's Legal and Compliance Director,
- RATP Dev's Strategy and HR Projects Director,
- RATP Dev's Compliance Manager.

The CEC will then decide on the most appropriate level of the alert management (at the company level or at the holding company level).

When using the whistleblowing system, you are encouraged to identify yourself by mentioning your full name, employing company and country of employment.

This information may facilitate the management of your alert and will be processed with the utmost confidentiality. **You can however remain anonymous.**

You must also provide factual information in sufficient detail to enable the processing of an alert. We ask that you:

- present materially verifiable facts including any information relating to the identity of the individuals subject of the alert and any document/evidence,
- refer only to relevant and adequate information that is strictly necessary to verify the acts reported,
- describe the acts reported in an objective manner.

* If an alert relates to a member of the above Committee, or a member of RATP Dev Management bodies, the alert can be sent to RATP group using the following email address: ethique.conformite@ratp.fr

4. WHAT GUARANTEES WILL THERE BE WHEN USING THE WHISTLEBLOWING SYSTEM?

Protection of identity



The whistleblowing system put in place guarantees strict confidentiality of the identity of the whistleblower and of any person involved in the processing of the alert.

The person subject to an alert cannot obtain the identity of the issuer without this person's consent.

Protection from retaliation



The issuer of the alert and any person involved in the processing of the alert will be protected against any retaliatory measures relating to the issuing of the alert, if the whistleblowing system is used to report or disclose information about acts that falls under this guide or forbidden by applicable regulations or relate to attempts to conceal breaches about these same acts.

To benefit from this protection:

- you must have reasonable grounds to believe, in light of the circumstances and the information available to you at the time of the reporting, that the matters reported are true.
- you must not derive any personal benefit from the alert and must not expect any counterpart from the alert (including financial counterpart) other than the cessation of the reported act.

As such, you and any person involved in the alert cannot:

- **be excluded** from a recruitment procedure or access to an internship or professional training period,
- **be sanctioned, dismissed or subject to any direct or indirect discriminatory measure**, in particular with regard to remuneration, working hours, performance assessment, incentive measures or the distribution of shares, training, reclassification, assignment, qualification, classification, professional promotion, transfer or contract renewal, and also harm to the person's reputation.

On the other hand, misuse of the whistleblowing system may leave the issuer of the alert open to disciplinary action, as well as legal proceedings. The same applies to an employee who has retaliated against a staff member in relation to an alert or investigation.

For more information:

- Code of Ethics,
- Code of Business Conduct and Prevention of Corruption,
- Whistleblowing System User Guide.

These documents are displayed on the notice board and available either on the whistleblowing platform or from the management.