

ALERT PROCEDURE

LAST UPDATED: 2018

The alert system set up by Covivio in 2011 is open to all its employees and stakeholders. Backed by our Ethics Charter, the alert system reflects Covivio's high level of commitment to Ethics, Compliance and the fight against all forms of corruption. The purpose of this procedure is to detail the process for reporting wrongdoing and to specify the guarantees of confidentiality and protection that we provide to whistleblowers.

What actions are involved?

In accordance with laws and regulations, there are many types of wrongdoing that may be subject to an alert. It could be:

- A crime or misdemeanor, a serious and manifest violation of a duly ratified or approved international commitment, a unilateral act of an international organization undertaken on the basis of such a commitment, law or regulation, or a threat or serious prejudice to the public interest
- Any other fraudulent, corrupt or influence-peddling behavior.
- Cases of discrimination or harassment
- In the event of serious and imminent danger to the life and health of an employee
- Any action contrary to Covivio's Ethical Charter.

Who is the recipient of the alert?

This is an internal collegial body composed of two people with no hierarchical link between them, including at least one member of Covivio's Executive Committee. The collegiate body is fully responsible for the strict confidentiality of the alerts it receives.

How do I make a report?

The report can be made by any means, in particular via a dedicated email address:

alerte@covivio.fr

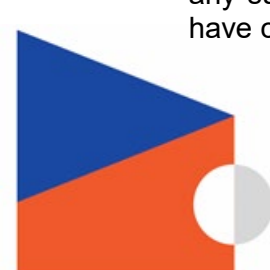
How alerts are handled

As soon as the alert is received, and within a period not exceeding 72 working hours, the Collegial Body shall contact:

- With the whistleblower
- With the accused person; in the event that a risk of destruction of evidence would make it necessary to put in place provisional measures, the Collegial Body may decide to withhold information from the latter.

The author of the alert will thus be informed that his alert will be taken into account, that an internal investigation may be opened, his rights, and the procedures for making his personal data anonymous following the investigations.

The person who is the subject of the alert will be able to contest this challenge and provide any supporting evidence. He cannot be accused of any wrongdoing until the investigations have confirmed the reprehensible nature of the actions.



Anonymous reports

Anonymous reports may be taken into account provided that the facts reported are sufficiently serious and detailed.

Need to act in good faith

Misuse of the alert device may expose its author to disciplinary sanctions and/or legal proceedings. However, the use of the system in good faith, even if the facts are revealed to be inaccurate or do not give rise to any action following the internal investigation, shall under no circumstances expose the whistleblower to sanctions.

Privacy

The collegiate body carries out investigations in the strictest confidentiality. Except in cases provided for by law involving disclosure to the judicial authority, the identity of the whistleblower may only be revealed with his or her consent. The identity of the person concerned and the facts against him or her shall be kept confidential in the same manner until the internal investigation leads, where appropriate, to legal and/or disciplinary proceedings.

Protection

Covivio guarantees the protection of the whistleblower in good faith against all forms of reprisals. In particular, Covivio will not take any disciplinary or discriminatory action against its employees who have made a report, even if the facts reported are not true.

Compliance with the 3 levels of reporting

The whistle-blower, in the absence of return from the Collegial Body within 72 working hours [1st level], may:

- refer directly to the competent authorities outside the company (judicial or administrative authorities or competent professional bodies) → [2nd level].
- As a last resort, in the absence of processing by the above-mentioned authorities within three months, the whistleblower has the option of making the facts public → [3rd level].

Any person may address his or her report to the Rights Defender in order to be directed to the appropriate body for the collection of the alert.

The whistleblower will benefit from the protection regime as defined by the law only insofar as he has respected the different levels of reporting.

In the event of a crime or misdemeanor, serious and imminent danger or where there is a risk of irreversible damage, the alert may be brought directly to the attention of the judicial or administrative authorities or professional bodies or may be made public.

