BETTER WAYS

CMA CGM Speak Up & Non-Retaliation Policy

CMA CGM Speak Up & Non-Retaliation Policy

N° VERSION	2

RESPONSIBLE ADMINISTRATOR

GROUP ETHICS AND BUSINESS INTEGRITY DEPARTMENT

CONTACT FOR ANY QUESTION ON THIS PROCEDURE:

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THE GROUP'S COMMITMENTS

Through this policy, the CMA CGM Group wants to reaffirm its commitment to conducting its activities with ethics and integrity, thereby ensuring the protection of its interests and reputation, as well as those of its employees and external stakeholders.

OBJECTIVES

The CMA CGM Group aims to strengthen the commitments outlined in its Code of Ethics and promote a culture of open communication, enabling everyone to be an active participant in upholding ethics at CMA CGM and contributing to the Group's pursuit of exemplarity.

Each Report may lead to the conduct of an Internal Investigation to determine a potential legal violation, ethical breach, or any other inappropriate behavior that could result in Corrective Actions.

Through this policy, the CMA CGM Group also wishes to reiterate its zero-tolerance policy towards Retaliation against anyone who makes a Report.

It is important to emphasize that Reporting mechanisms cannot in any way replace emergency services (police, firefighters, emergency medical care, etc.) in the presence of a serious or imminent danger.

SCOPE OF APPLICATION

This procedure applies worldwide to all employees, associates, and stakeholders of the CMA CGM Group, i.e., CMA CGM S.A. and each of its controlled subsidiaries ("CMA CGM" or "CMA CGM Group"), excluding CEVA Logistics (including its controlled subsidiaries), which has its own mechanism for collecting and managing Reports.

WHAT CAN BE REPORTED?

Several types of incidents may be subject to a Report. Specifically, this includes any information regarding:

a) a crime,
b) an offense,
c) a threat or harm to the public interest,
d) a violation or an attempt to cover up a violation of an international commitment that has been regularly ratified or approved by France, a unilateral act of an international organization based on such a commitment, European Union law, or national law or regulation.

It may also include information about actions violating the Group's internal processes and policies:

e) violations of the Group's anti-corruption code of conduct,

f) fraudulent practices such as embezzlement, manipulation of financial statements, procurement fraud, expense report fraud, payroll manipulation, data theft, or disclosure of confidential information, etc.
g) any practice contrary to business integrity: conflicts of interest, inappropriate gifts and invitations, unsuitable donations and sponsorships, mismanagement of personal data, etc., in violation of the Group's applicable rules.
h) any behavior contrary to ethical standards.

Non-exhaustive examples:

- Theft (equipment and supplies)
- Embezzlement of funds
- Breach of trust, misuse of company assets
- Tax fraud, accounting irregularities
- Forgery and use of forged documents
- Corruption and influence peddling, bribery, facilitation payments, or any other illegal payment
- Illegal activity by a contracting or supplier third party
- Public procurement (favoritism, conflict of interest in public contracts)
- Gifts and hospitality that constitute a criminal offense
- Unfair, illegal, or deceptive business practices
- Any violation of CMA CGM Group's Procedures or Policies
- Anti-competitive practices
- Breach of confidentiality, violation of intellectual property rights
- Unauthorized use of personal data
- Breach of digital security
- Customs violations, violations of import-export policies
- Discrimination
- Sexual assault
- Harassment
- Retaliation
- Use of illicit substances in the workplace
- Working conditions / human rights
- Conflict of interest
- Compliance with environmental and health regulations

Depending on the jurisdiction, the definition or application of the types of incidents listed above may vary. For any questions on this matter, it is advisable to contact the local legal teams or submit a question through the Ethics & Compliance Helpline.

Any ethical questions: Beyond reporting the incidents listed above, individuals covered by this policy are strongly encouraged to reach out to the Ethics & Compliance department to ask any questions related to professional ethics.

WHO CAN REPORT?

The following individuals may file a Report:

- Full-time or part-time employees, consultants and independent contractors, temporary employees, interim workers, volunteers, interns, employee representative bodies, directors and shareholders,
- Candidates and future employees, as well as employees who have recently left the company, provided they became aware of the incidents reported during their employment contract or recruitment process,
- Third parties to the company: customers, suppliers, intermediaries, and any individual in a commercial relationship with the CMA CGM Group.

To benefit from the protections provided in this document, the Reporting Party must:

- Be a natural person,
- Act in good faith[1],
- Act without direct financial compensation (except in jurisdictions that allow it),
- If the Report concerns incidents not encountered in the course of their professional activities, the Reporting Party must have personally become aware of them. This condition does not need to be met if the Report concerns incidents that were discovered in the course of their professional activities,
- Follow the procedure described below.

The protections provided by the reporting system are extended to:

- Facilitators (any non-profit private individual or legal entity who assists the Reporting Party in making a Report),
- Individuals connected to the Reporting Party (anyone who could face retaliation in the course of their professional activities from the employer, their client, or the recipient of their services), and
- Legal entities controlled by the Reporting Party (for which they work or with which they have a professional relationship).

REPORTING CHANNELS

All Reports made to the CMA CGM Group, regardless of the channel used, are forwarded to the Ethics and Compliance team, which is responsible for their proper administration and ensures they are handled by the Investigations Teams.

[1] The good faith is defined in the section "Admissibility of the Report."

Ethics & Compliance Helpline

Any Report can be made directly via the Ethics & Compliance Helpline, which is accessible 24/7. This system is provided by an external service provider who offers a secure channel for collecting all Reports and ensures their optimal handling and analysis.

Link : https://app.convercent.com/en-US/LandingPage/e1dc6210-ea8d-ed11-a995-000d3ab9f296

If you are an employee of the CMA CGM Group, you can also access the Ethics & Compliance Helpline from the MyHUB intranet page by clicking on the Ethics and Compliance section, then on Ethics & Compliance Helpline.

Reports submitted via the Ethics & Compliance Helpline can be made through an "open format" online form where you can attach supporting documents, or by phone to an operator from our external service provider, who is responsible for collecting your statements (country-specific contact numbers are available on the home page of the Ethics & Compliance Helpline at the link mentioned above). It should be noted that the operator is not a CMA CGM Group employee. Their role is solely to collect your Report.

Anonymous Reports: Unlike other reporting channels detailed below, the Ethics & Compliance Helpline allows for anonymous reporting in countries where this option is permitted. This means you are not required to provide your identity or contact details when making a Report, unless local laws stipulate otherwise. However, you may choose to provide your email address to our external service provider in an encrypted manner to be notified in case of any communication from our teams via the secure communication channel. Neither our external service provider nor CMA CGM teams will be able to access this email address. If you choose not to provide an email address, it is important to regularly log into your secure space to check for any communications from the Investigations Team. Access to your space is available via the Ethics & Compliance Helpline home page under the "Check Status" section.

By Email

Although we encourage the use of the Ethics & Compliance Helpline, you can also contact your designated point of contact for these matters at the local or regional level. Their contact details are available through our internal communication tools or in the directory accessible on the intranet.

In case of technical difficulty to access the Ethics & Compliance Helpline, you can write to the following e-mail addresses:

Seafarers: ho.seafarercomplaints@cmaships.com

Other employees: ho.ethicsalert@cma-cgm.com

All reports sent to these addresses are centralized with the Ethics & Compliance team and internally redirected to the appropriate contact person.

In person, by phone, or via videoconference

You can directly contact employees from the Ethics & Compliance or Human Resources departments, the Fraud team, or your direct supervisor, hereafter referred to as "authorized persons”. Should the Reporter of a Report submitted orally request a physical or a video conference meeting, it will be organized within twenty (20) business days of receiving the request. Any Report submitted orally will be systematically transcribed in writing and signed by its Reporter to ensure rigorous and complete traceability. The Report will be recorded by the authorized person in the centralized reporting management platform.

If you have difficulty identifying your contact person, feel free to ask a question via the Ethics & Compliance Helpline.

Reports outside of designated channels

The Group makes every effort to ensure that any Report made outside the designated channels is taken into account, where possible, and processed in accordance with this policy. However, we would like to draw your attention to the fact that it may be difficult to ensure that your contact person properly records your Report in accordance with the Group's rules if they are not one of the designated contacts mentioned above. Only these individuals are informed of the procedure to follow for recording a report and entering it into the dedicated platform.

External reports

Although we encourage you to use the channels provided by the Group for submitting your Reports, in some countries, legislation allows you to make your Report directly or simultaneously to an external authority.

For countries within the European Union, the list of the relevant countries and their contact details are provided in Annex 2 of this policy.

ACKNOWLEDGEMENT OF RECEIPT

Acknowledgment of receipt of a Report is made within seven (7) business days following its receipt by the authorized person responsible for collecting the Report. However, the acknowledgment of receipt does not imply the admissibility of the Report (see the section below).

REPORT ADMISSIBILITY

The examination of a Report and the assessment of its Admissibility are conducted within seven (7) business days following the sending of the acknowledgment of receipt. However, the

Admissibility of a Report can only be determined if the Reporting Party has provided sufficient information for its analysis.

If the Ethics & Compliance team requests additional information, the assessment of Admissibility will be carried out as soon as possible following the receipt of the supplementary information, without exceeding seven (7) business days.

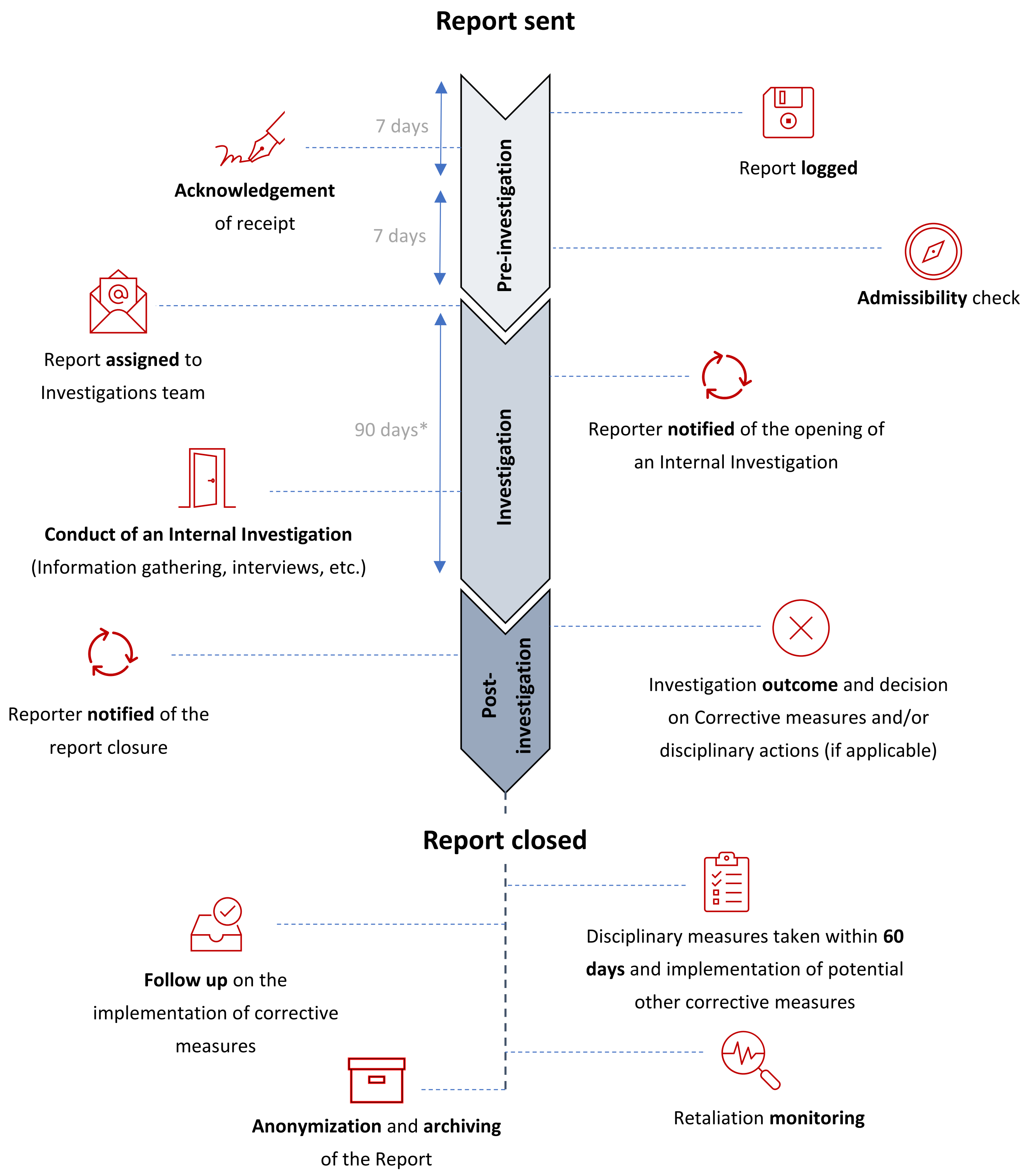
To be considered admissible, a Report must be made in good faith, without direct compensation, and meet the conditions listed in the subsection "What incidents to report?"

A Report made "in good faith" is defined as a statement made by a person who sincerely and reasonably believes that the information they are communicating is true at the time they report it. This belief must be based on honest facts and observations, even if the information later turns out to be incorrect.

Any Report made in bad faith, with the deliberate intent to harm the CMA CGM Group and/or an employee, may be subject to appropriate disciplinary action as per the company's internal rules, including legal proceedings.

REPORT MANAGEMENT

The management of a Report is a collaborative process involving several stakeholders at different stages of the Report's lifecycle (see workflow below).



*Up to 180 days for complex investigations

ROLES AND RESPONSABILITIES

The Ethics & Compliance team is responsible for ensuring that the Reporting process complies with applicable laws and regulations, operates effectively, is communicated appropriately to various stakeholders, and is reviewed periodically.

The Investigations Team is responsible for the proper implementation of the Investigation process arising from the submission of a Report.

The Internal Investigation process is a data collection process designed to validate or invalidate one or more Allegations related to illegal, unauthorized, or unethical practices contrary to the CMA CGM Ethics Charter. The process applies from the assignment of the Report to the Investigation Team until its archiving.

The Business Teams are responsible for implementing any Corrective Actions and disciplinary measures resulting from the Internal Investigation process. Decision-making occurs, when applicable, with the support of the Investigations Teams and/or the Ethics & Compliance team and/or the Human Resources team.

External parties: If the analysis of the Report cannot be managed exclusively internally, an external firm or support may be engaged, subject to the same confidentiality rules and reporting procedures. The decision to outsource the management of a Report rests with the Investigations Team, which will consider criteria such as: the required expertise, available resources, the nature of the Report, and any other relevant criteria deemed appropriate.

INTERNAL INVESTIGATION

<u>Applicable standards</u>: The conduct of Internal Investigations within the CMA CGM Group is defined in an internal process based on applicable international standards.

<u>Business expertise</u>: Our Internal Investigation process relies on in-depth business expertise, ensuring a rigorous and accurate analysis of each situation. Our Investigation Teams are composed of qualified and experienced professionals with a thorough understanding of the specifics of our industry. This know-how allows us to ensure the compliance of our practices, maintain high standards of quality, and strengthen the trust of all our stakeholders.

<u>Duration:</u> Our Internal Investigation process is structured to guarantee optimal efficiency and speed. However, the time required to process a Report may fluctuate depending on the complexity of the facts to be investigated.

The Group strives, whenever possible, to complete an Internal Investigation within a maximum of 90 days, except in complex cases where it may be extended to 180 days. This rigor in timelines allows us to address each situation with the necessary diligence while maintaining a high level of quality in our Internal Investigations.

Guiding Principles: In the context of our Internal Investigations, we are committed to adhering to five guiding principles that ensure the effectiveness and integrity of our processes:

1. Confidentiality: Information collected during our Internal Investigations is shared only with individuals involved in the management process of a Report. The goal is to protect the parties involved and preserve the integrity of the Internal Investigation.
2. Independence: Our Internal Investigations are conducted independently, without external influence. This guarantees that Internal Investigations are carried out objectively, without bias, based solely on the available facts and evidence.
3. Impartiality: We are committed to treating all parties involved fairly and impartially. Each Report is examined equitably, disregarding any biases that could affect the judgment of the Investigations Team.
4. Integrity: Integrity is at the heart of our Internal Investigation process. We adhere to the highest ethical standards and commit to acting honestly throughout the Internal Investigation while demonstrating transparency as much as possible.
5. Proficiency: Our Internal Investigations are conducted by qualified professionals possessing the necessary expertise to handle complex situations. We ensure that our Investigation Teams are trained and have the required skills to conduct thorough and rigorous Internal Investigations.

By adhering to these guiding principles, we ensure that our Internal Investigations are conducted in a professional, reliable manner and in compliance with industry best practices.

DISCIPLINARY SANCTIONS AND CORRECTIVE MEASURES

Any disciplinary sanctions resulting from the Internal Investigation process must be implemented within 60 days from the closure of a Report.

Any Corrective Actions resulting from the Internal Investigation process must also be implemented, except in exceptional cases, within 60 days from the closure of a Report.

THE RIGHTS AND OBLIGATIONS OF THE REPORTING PARTY

The submission of a Report is an involved process for the Reporter and the various stakeholders. Therefore, it is important to ensure that one understands the rights and obligations associated with it to ensure a secure, respectful, and integrity-driven approach.

Rights

The Reporter benefits from several important rights.

First, the confidentiality of the Internal Investigation is assured, guaranteeing that shared information will be treated with the highest level of discretion and only as necessary.

In this regard, identifying information about the Reporter can only be disclosed with their consent. However, this information may be communicated to the judicial authority only when the individuals responsible for collecting or processing the reports are required to report the facts to them. The Reporter will be informed unless such information risks compromising the judicial procedure.

Protection of anonymity is also guaranteed when local regulations allow. It is the responsibility of the Reporter not to provide any information that may lead to their identification. However, if the Reporter communicates identifying elements, their consent will be required before disclosing these elements to a third party. An exception will be made for Reports that, due to their nature, must be communicated to a judicial authority. The Reporter will be informed unless such information compromises the judicial procedure.

Furthermore, Reporters are protected against Retaliation as detailed in the *Non-Retaliation Policy* section. They are assured that they will not suffer any negative consequences for making the Report.

The right to modify and delete their personal data is as mentioned in Annex 1.

Subject to applicable local legislation or the approval of the Investigation Team, support from a third party is possible during the Internal Investigation process. The support person can be a staff representative, a union representative, a counselor, psychological support, or a trusted third party. However, the support person must commit not to interfere with or obstruct the proper conduct of the Internal Investigation process.

Obligations

At the same time, Reporters are required to adhere to certain obligations to guarantee the integrity of the Internal Investigation.

They must fully cooperate with the process by providing all necessary information and collaboration for conducting the Internal Investigation.

Reporters are also required to maintain integrity and honesty in the information provided, ensuring the reliability and impartiality of the process.

Non-disclosure of information learned during the Investigation is essential to preserve the confidentiality and effectiveness of it. Therefore, the Reporter commits to not communicate any information disclosed to them during the Internal Investigation to anyone outside the Investigation Team.

Finally, they must adhere to the provisions of this policy by strictly following the established rules and procedures.

This policy is implemented to create a safe and transparent work environment, where everyone feels free to express themselves and report issues without fear of repercussions.

NON-RETALIATION POLICY

CMA CGM does not tolerate any form of Retaliation against anyone who, in good faith, raises a concern or reports unethical or illegal behavior, cooperates with an Internal Investigation, or refuses to engage in actions that violate our Code of ethics, our internal policies, or the law.

Individuals who engage in Retaliation will face disciplinary measures from CMA CGM, which may include termination. Actions of Retaliation that violate the law could also expose the individual to legal action.

It is important to note that this policy will not protect you from potential disciplinary measures if you, as the Reporter, are also involved in or connected to inappropriate conduct or illegal activities that are the subject of a Report.

The policy also protects "Whistleblower Facilitators," referring to individuals or entities that assist the Reporter in making a Report to CMA CGM, as well as individuals related to the whistleblower in a professional context and controlled entities (see the section "What can be reported?").

Retaliation can take many forms, and it can sometimes be difficult to identify. The following scenarios are examples of potential signs of Retaliation:

- Suspension, layoff, termination, non-renewal, or early termination of a temporary employment contract;
- Demotion or refusal of promotion or training;
- Modification of duties, change of workplace, salary reduction, modification of work hours;
- Negative performance evaluation or unfavorable recommendation;
- Disciplinary measures, reprimands, or other sanctions, including financial penalties;
- Intimidation, harassment, discrimination;
- Refusal to convert a temporary employment contract into a permanent contract when the worker had legitimate expectations of obtaining permanent employment;
- Harm, including damage to the person’s reputation, particularly on social media, or financial loss, including loss of business and income;
- Limiting the ability to find another job, for example, through blacklisting based on an informal or formal agreement within an industry, indicating that the person will not be employed in the industry in the future.

If you believe you are experiencing Retaliation after speaking out, you must inform the Investigation Team or your Ethics & Compliance team to allow for appropriate action to be taken.

GROUP REPORT COMMITTEE

The Reporting Committee is composed of the Group Chief Legal Officer, the Group Chief Compliance Officer, the Group Vice-President in charge of the Risk, Internal Control, Internal Audit and Investigations Team, the Group Vice-President Human Resources and the Human Resources Compliance Director.

The Reporting Committee may, on a case-by-case basis, and only if strictly necessary for the purpose of confidentiality, invite other individuals. In no case shall information regarding the identity of the Reporter or the individuals involved be disclosed within the framework of this Committee.

The Reporting Committee meets regularly to ensure the proper handling of closed Reports and to monitor the evolution of key performance indicators. In particular, indicators related to the percentage of Reports for which acknowledgment was made within seven (7) working days, as well as the percentage of Internal Investigations closed within 90 days following the acknowledgment of the Report, are monitored.

ADMINISTRATION, CONTROLS, AND REVIEW

The Group Chief Compliance Officer is responsible for the administration and review of this policy.

This policy will be periodically revised based on legislative and regulatory developments by the Group's Chief Compliance Officer.

Controls will be carried out periodically, in accordance with the internal control framework defined by the Ethics & Compliance department, to ensure the proper functioning of the professional reporting management process.

CONTACTS

In case of doubt regarding the application of this policy, any questions can be addressed to the Ethics & Compliance Department of the CMA CGM Group at the address ho.ethicsalert@cma-cgm.com, to the Group Chief Compliance Officer or to the Responsible for the Speak-Up Program.

The list of contacts for the Ethics & Compliance team is accessible at the following link:

https://cmacgmgroup.sharepoint.com/sites/CMA-EthicandCompliance/Ethics-%26-Business-Integrity/SitePages/Our-team.aspx.

KEY TERMS

Terms	Definition
Admissibility	Designates the process for validating the compliance of a Report with the provisions of this policy.
Allegation(s)	A statement or declaration that a person or organization has exhibited behavior contrary to one of the elements specified in the section "What facts to report?" All allegations constitute a report.
Applicable regulation	Together, Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, concerning the protection of individuals with regard to the processing of personal data and the free movement of such data (General Data Protection Regulation or GDPR), and Law No. 78-17 of January 6, 1978, relating to information technology, files, and freedoms in its latest version in force.
Business teams	Refers to the employees of the CMA CGM Group responsible for a team or department and who possess the competence and authority to implement Corrective Actions resulting from an Internal Investigation.
Corrective measures	A set of remedial measures taken following an Internal Investigation involving, in particular, the imposition of disciplinary sanctions, the updating of internal processes or policies, and any training, communication, or other actions.
Ethics & Compliance Helpline	System used by the CMA CGM Group for collecting Reports, possibly anonymously, and also for gathering questions of an ethical nature.
Facilitators	Understood as any individual or any non-profit legal entity that assists a whistleblower in making a report or disclosure in accordance with the admissibility conditions detailed above.
Internal Investigation(s)	Process of collecting information to corroborate or invalidate one or more Allegations communicated to the CMA CGM Group as part of a Report.
Investigations teams	Designates all employees of the CMA CGM group authorized to implement the Internal Investigation process following the receipt of a report and the confirmation of its admissibility.
Report(s)	Set of Allegations brought to the attention of the CMA CGM Group indicating facts contrary to one of the elements specified in the section "What facts to report?".
Reporter(s)	Designates the individual responsible for communicating a report to the CMA CGM Group.
Retaliation	Punitive or discriminatory act(s) intended to cause direct or indirect harm to the Reporter and to other individuals listed in the "Non-Retaliation Policy" section.

Annexes

ANNEX 1 - PROTECTION OF PERSONAL DATA

This annex explains how the CMA CGM Group uses and shares the personal data it collects under this policy. This includes all personal data related to the Reporter, as well as data concerning individuals named in the Report or involved in the Internal Investigation process.

CMA CGM SA is the data controller of your personal data (i.e., the entity that determines the purposes and means of processing your personal data) in order to manage the received reports.

Rights of Data Subjects

In accordance with the Applicable Regulation, CMA CGM Group recognizes and respects the rights of data subjects regarding the processing of their personal data. These rights include:

Right of Access: Individuals have the right to obtain confirmation of whether personal data concerning them is being processed, and, if so, access to that personal data and a copy of it. Exercising this right must not adversely affect the rights and freedoms of others.

Right to Rectification: Individuals have the right to request the correction of inaccurate personal data concerning them, as well as the completion of incomplete data, including by providing a supplementary statement. However, this right does not allow the data subject to retroactively modify elements contained in the Report or collected during its processing.

Right to Erasure: Individuals have the right to request the deletion of their personal data in certain circumstances, such as when the data is no longer necessary for the purposes for which it was collected. However, this right is not absolute, and CMA CGM Group may have legal or legitimate reasons to retain such data.

Right to Restrict Processing: Individuals have the right to request the restriction of the processing of their personal data in specific cases, for example, if they contest the accuracy of the data or oppose its processing.

Right to Give Post-Mortem Directives: Individuals have the right to give CMA CGM Group prior directives regarding the use of their personal data after their death.

Right to Object: Individuals have the right to object, for reasons related to their particular situation, to the processing of their personal data, especially in cases where the processing is based on the legitimate interests of CMA CGM Group (see the section "Purposes of Processing Personal Data" below). When the processing is carried out to enable CMA CGM Group to comply with a legal obligation, the right to object does not apply (see the section "Purposes of Processing Personal Data" below). When this right can be exercised, it is not absolute, and CMA CGM Group may refuse to comply if there are compelling legitimate grounds for continuing the processing or if the processing is necessary for the establishment, exercise, or defense of legal claims.

Right to Lodge a Complaint: Any individual who believes that the processing of their personal data constitutes a violation of the Applicable Regulation has the right to lodge a complaint with a supervisory authority, particularly in the member state where they reside, work, or where the violation occurred. In France, you have the right to lodge a complaint with the *Commission Nationale de l'Informatique et des Libertés* (CNIL). Our company fully supports and respects this right, and no individual will face retaliation for exercising their rights under the GDPR or for filing a complaint with a supervisory authority.

You can also contact the Data Protection Officer of CMA CGM Group by email at: ho.dpo@cma-cgm.com or by mail addressed to the Data Protection Officer, 4 quai d'Arenc, 13002 Marseille, France.

Your request should provide sufficient details to allow us to understand, assess, and respond appropriately.

Type of Personal data collected

The data that CMA CGM Group may collect in the context of a report includes:

- Identity, position, and contact details:
    - Of the reporter (unless the report is anonymous),
    - Of the individuals subject to the report,
    - Of individuals involved, consulted, or heard during the collection or processing of the report,
    - Of whistleblowing facilitators and individuals connected to the reporter.
- Any relevant and necessary data related to the subject of the report, specifically the report (the reported facts), the information collected during the verification of the reported facts, the records of verification operations, and the follow-up actions taken on the report.

Some of the data collected may be considered sensitive, such as data revealing or concerning health, racial or ethnic origin, religion, sexual orientation, political opinions, and/or union membership. CMA CGM Group will only process this data if it is necessary to establish, exercise, or defend legal rights.

CMA CGM Group is committed to collecting only the data that is useful for the internal investigation process of a report. Any data collected that is not directly related to the subject of the report will be immediately deleted by the Investigation Team. In case of doubt about the relevance of the collected data, the Investigations Team will retain it until it can assess its relevance.

Purposes for processing this personal data

CMA CGM Group collects data for the following purposes:

- To implement the reporting management process and determine whether a specific rule has been violated,
- To establish the internal investigation process and carry out the necessary verifications, inquiries, and analyses,
- To ensure the proper implementation of corrective actions to remedy such a violation and/or prevent its recurrence,
- To protect the individuals involved,
- To exercise or defend rights in legal proceedings.

Legal Ground for processing personal data

The processing of personal data in relation to the reporting of alerts by CMA CGM Group is based on the applicable legal grounds in the jurisdictions where CMA CGM Group operates and on CMA CGM's legitimate interest in preventing and detecting wrongful acts.

Recipients of Personal Data

The personal data collected for the aforementioned purposes will be shared on a limited basis with CMA CGM Group employees involved in its processing, as well as with our external provider CONVERCENT, which administers the Ethics & Compliance Helpline, under the direction and control of the CMA CGM Group. In some cases, we may also engage an external law firm or consultant to access your personal information to assist in conducting internal investigations.

When we share personal information with these third parties, CMA CGM Group requires them to use this personal data solely within the scope of their mission and in a manner consistent with the CMA CGM Group's Global Privacy and Data Protection Policy and the Applicable Regulations. In this regard, these third parties are subject to a strict confidentiality obligation, which they commit to respect in writing.

The processing of relevant personal data is carried out securely and responsibly. Additionally, personal data collected in the context of the reporting management process will not be disclosed to any other party unless our company is required to disclose or share your personal data to comply with a legal obligation or when it is necessary to report criminal offenses. This may include law firms or consulting firms.

Cross-Border Transfers

Reports may involve the transfer of personal data when stakeholders are located in third countries, as the alert procedure covers multiple jurisdictions. CMA CGM SA Group committed to implementing all necessary means to comply with Applicable Regulations.

The transfer of personal data as part of a Report to a third country (for example, to a subsidiary of the CMA CGM Group) is only carried out when necessary and in accordance with strict security rules to protect the integrity of the data transferred.

Specifically, your personal data may be transferred to countries that do not have an adequacy decision from the European Commission, including the following countries:

- The country where the person implicated in the Report is located (i.e., the countries where CMA CGM Group entities are established),
- The country where a Regional Ethics & Compliance, Fraud, or HR Officer of the CMA CGM Group is located, namely Singapore, the United States or Brazil.

When your personal data is transferred to one of these countries, CMA CGM SA is committed to ensuring an adequate level of protection for your personal data through the measures outlined in the Binding Corporate Rules ("BCRs").

You can consult the BCRs on our website (available here) or obtain a copy of these BCRs at any time by contacting CMA CGM at the addresses and using the methods specified in the "Rights of Data Subjects" section above.

Data Retention Periods

Reports are retained and archived according to strict rules of confidentiality and security.

Data related to a report may be kept in active storage until a final decision is made regarding its follow-up. This decision must be made within a maximum period of two (2) months following the closure of the report.

After the internal investigation phase, reports are maintained in "intermediate archive" for a strictly proportional period to their processing and to the protection of their authors, the individuals they target, and the third parties they mention, taking into account the timelines for any additional internal investigations and until the expiration of any potential litigation, without exceeding a period of six (6) years from the closure of the report. Access to the report will be restricted to system administrators for a period of one (1) year after the closure of the report to ensure the proper implementation of corrective actions.

An annual audit of reports in intermediate archive will be conducted by the Ethics & Compliance department to ensure the anonymization and final archiving of the reports concerned.

Finally, after the expiration of the intermediate archiving period, the data will undergo "final archiving." In this context, it will be irreversibly anonymized and retained solely for reporting purposes to ensure the protection of the rights and freedoms of the individuals concerned.

ANNEX 2: SPECIAL MEASURES APPLICABLE IN CERTAIN COUNTRIES

European Union

This annex applies to all legal entities of the CMA CGM Group located in the European Union to which Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019, on the protection of people who report breaches of Union law applies.

Reporting Channels and Local Investigation Teams

Depending on the legal entity to which the Reporter is affiliated, they may have the option to report to a dedicated person based in the same country as the person being reported (local report).

If this option is applicable to the legal entity of the Reporter, it will be suggested in the online form or during the call to the Ethics & Compliance Helpline to indicate the entity to which the report should be forwarded. It will be directly transmitted to a local team responsible for processing it. If the report needs to be communicated to the head office due to its nature or because it cannot be processed solely at the local level (for example: if the reported employee holds a position within a different legal entity than where the report was made), the Reporter will be asked for permission to transfer their report to the concerned legal entity, which will have the option to give its consent or refuse it, in which case the report will be closed.

If the concerned entity has more than 250 employees, the internal investigation may be conducted by a local investigation team trained in conducting internal investigations. Otherwise, a regional investigation team or one attached to the head office may intervene in the processing of the report.

In all cases, the CMA CGM Group takes all measures to ensure that the same standards are applied regardless of the reporting channel selected.

List of External Authorities to Which You Can Address Your Report

The Member States of the European Union have designated, in addition to the option of reporting to an institution, an organ, or a competent body of the European Union, one or more competent local authorities responsible for receiving and examining reports and retaliation complaints. The list of these authorities is provided below.

Country	Authority
Germany	https://www.bundesjustizamt.de/EN/TheFederalOffice/TheFederalOffice_node.html https://www.bafin.de/EN/Homepage/homepage_node.html
Belgium	https://www.fsma.be/en/faq/whistleblowers-point-contact
Spain	https://www.antifraucv.es/en/whats-the-agencia-valenciana-antifraude/ https://www.antifrau.cat/en/mailbox/report-corruption
Estonia	Determination of authorities in progress
France	(i) (i) The Defender of Rights, (ii) (ii) A judicial authority, (iii) (iii) One of the competent authorities listed in the annex of decree no. 2022-1284 of October 3, 2022, concerning the procedures for collecting and processing reports made by whistleblowers and establishing the list of external authorities set up by law no. 2022-401 of March 21, 2022, aimed at improving the protection of whistleblowers (https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000046357368), (iv) (iv) An institution, a body, or an agency of the European Union competent to collect information on violations covered by the scope of Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019.
Greece	https://aead.gr/en
Italy	https://www.anticorruzione.it/en/home
Netherlands	https://www.huisvoorklokkenluiders.nl/english
Poland	https://bip.brpo.gov.pl/en
Portugal	https://diariodarepublica.pt/dr/en/general/links-interest
Romania	https://integritate.eu/
Slovakia	https://www.bojprotikorupcii.gov.sk/kontakty/?csrt=3344253411942595657 https://www.employment.gov.sk/en/
Sweden	https://www.av.se/en/about-us/contact-us/