

WHISTLEBLOWER CHARTER

ELIOR GROUP

What is the purpose of the whistleblowing hotline?

Elior Group has implemented an outsourced reporting system that enables reports to be submitted confidentially through a tool managed by an independent external provider (Whispli).

Where reports fall within the scope defined in the Charter below, they are forwarded to a Case Manager who is responsible for handling them.

Committed to fostering a culture of open dialogue, the Group encourages all employees to read this Charter and to use the reporting system to submit any report.

Can I report a concern?

Any person who has been directly affected by, witnessed, or become aware of facts in a professional context may bring a report to the attention of Elior Group (hereinafter referred to as the "Reporting Author"). This includes:

- Employees (including staff members, shareholders, corporate officers, and agents), including external and temporary workers (such as temporary agency workers, apprentices, and interns);
- Individuals whose employment relationship with Elior Group has ended, provided that the information was obtained during that relationship;
- Individuals applying for a position within Elior Group, provided that the information was obtained during the recruitment process;
- Elior Group's contractors and their subcontractors;
- Elior Group shareholders;
- Customers and any other concerned external stakeholders.

What can I report ?

The reporting system may be used to report the following matters:

- Breaches of competition rules (e.g., exchange of confidential information, price-fixing agreements).
- Corruption (e.g., offering or receiving an undue advantage in exchange for the award of a contract).
- Influence peddling (e.g., paying a third party to obtain an undue advantage through their influence over a public authority or administration).
- Conflicts of interest (e.g., favouring a supplier with whom there is a personal or family relationship).
- Money laundering / terrorist financing.
- Fraud.
- Moral and/or sexual harassment and discrimination.
- Threats to the physical integrity of individuals.
- Data breaches / GDPR violations.
- Breaches of hygiene and/or quality standards.
- Environmental harm or adverse impacts on human rights and fundamental freedoms.
- Breaches of occupational health and safety rules or indecent working conditions.
- Any other violation of a law, regulation, or breach of Elior Group internal rules (e.g., the Ethics Principles or the Integrity Guide).

Is it possible to report inappropriate behavior (repeated jokes with a sexual connotation) on behalf of a colleague who does not feel comfortable talking about it?

Repeated jokes with a sexual connotation can be considered as sexual harassment. As such, this type of behavior can be reported through the whistleblowing hotline.

An employee may file a complaint regarding facts that have been reported to him or her in a **professional context**, even if he or she is not directly affected, as long as the interests in question are legitimate (in particular , if they fall within the scope of this Charter).

How can I file a report?

A report may be submitted through any of the reporting channels described below. The Reporting Author may provide, through these channels, any information or evidence that may support the reported facts, regardless of its form or medium.

Reporting can be done:

Through the Whispli reporting platform, accessible via the Integrity & Compliance page of the Elior Group website, on OnePlace, or by scanning the QR Code below:

The platform is available in all Group languages, including:

By telephone (available in Spain and Italy only), 24 hours a day, 7 days a week, using the following numbers:

- **Spain:** +34 900 933 290
- **Italy:** +39 800 934 362

The report will be collected by an AI operator, in English, Spanish or Italian, according to your preference.

By email:
chiefcomplianceofficer@eliorgroup.com

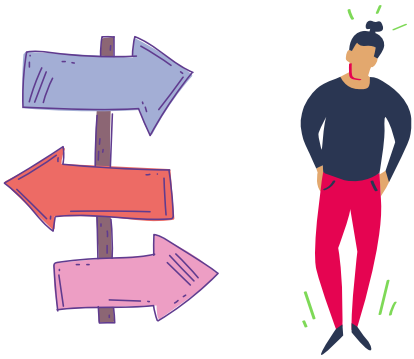
Friendly reminder

Anonymous reports are handled in the same way as all other reports. However, where such reports are submitted through a channel other than the reporting platform, it may not always be possible to inform the Reporting Author of the outcome of their report due to the practical constraints associated with maintaining their anonymity.

In addition, the absence of dialogue with the Case Manager may limit the quality and effectiveness of the investigation conducted as part of the report-handling process.

To facilitate the monitoring of your case and enable secure communication with the Case Manager, you are strongly encouraged to use the reporting platform, create a Whispli account and/or download the mobile application.

A report will only be considered after an initial review has been conducted to ensure that the reported facts are sufficiently consistent and substantiated.



Do I have to go through the whistleblowing hotline to make a report?

No. The dedicated reporting system is not intended to replace other reporting channels but rather to provide reporting authors with an additional reporting tool that offers enhanced confidentiality. The choice of reporting channel always remains at their discretion.

Accordingly, a report may be submitted directly to a trusted internal contact, such as a line manager, a Compliance representative (via the Contact section of the Elior Group website), the Legal Department, the Human Resources Department, or an employee representative.

It is also possible to submit a report directly to the competent external authorities listed in the appendix to Decree No. 2022-1284 of 3 October 2022 on procedures for receiving and processing reports submitted by reporting authors, as well as in Decree No. 2026-311 of 24 April 2026, if the reporting author does not feel comfortable using the internal reporting channels made available.

What follow-up will be given to my report?

An acknowledgement of receipt (indicating the date and time the report was received) will be sent to the reporting author by the Case Manager within seven working days of the report being submitted. The Case Manager will verify that the reported facts fall within the scope of the reporting system and that they are sufficiently substantiated to warrant further review.

No later than three months after the acknowledgement of receipt of the report, the reporting author will be informed by the Case Manager of the decision regarding the follow-up to be given to the report:

- The report may be closed if it is deemed inadmissible. The notification will specify the reasons for the closure (e.g., the report falls outside the scope of the reporting system or is insufficiently documented). Where appropriate, the reporting author will be directed to the relevant internal contact.

- A decision may be made not to initiate an investigation where the report is admissible, but the available information is sufficient to confirm or refute the allegations without the need for further inquiries. Where appropriate, suitable remediation measures will be implemented.

- Or an investigation may be opened where the report is admissible and further inquiries are required to verify the allegations and, where appropriate, determine the suitable remediation measures to be implemented.

How am I protected in the event of a report?

In accordance with the law, no retaliatory measure against a whistleblower shall be tolerated.

Whistleblowers benefit from a protected status designed to safeguard them against any adverse consequences resulting from a report, provided that the report was made in good faith and that the whistleblower had reasonable grounds to believe that the report was necessary to protect the interests at stake (such as the health and safety of employees, customers, the protection of Elior Group's integrity and reputation, etc.).

Accordingly, Elior Group prohibits any form of retaliation, threat of retaliation, or attempted retaliation, including but not limited to the following:

- Suspension, temporary lay-off, dismissal, or equivalent measures;
- Demotion or denial of promotion;
- Transfer of duties, change of workplace, salary reduction, or changes to working hours;
- Suspension of training opportunities;
- Negative performance evaluations or employment references;
- Disciplinary measures imposed or administered, reprimands, or any other sanction, including financial penalties;
- Coercion, intimidation, harassment, or ostracism;
- Discrimination, unfavourable treatment, or unfair treatment;
- Failure to convert an employment relationship into a permanent contract where the individual had a legitimate expectation that such conversion would be offered;
- Non-renewal or early termination of a fixed-term employment contract or temporary employment contract;
- Harm, including damage to a person's reputation, particularly on online communication platforms, or financial losses, including loss of business and loss of income;
- Blacklisting within a sector or industry;
- Early termination or cancellation of a contract for goods or services;
- Revocation of a licence or permit;
- Improper referral for psychiatric or medical treatment.

Important: facilitators (third parties who aid the whistleblower to make a report, such as unions or NGOs) and the **relatives** and **colleagues** of the whisleblower are also protected under this Charter and are entitled to the same level of protection as the whistleblower.

As part of a call for tenders organized by the Group, the company belonging to the brother of your manager wins the contract even though its offer was less advantageous than those of other competitors. You hesitate to report this situation because you are afraid of suffering retaliation. You also fear being penalized if your report turns out to be unfounded or inaccurate.

Any form of retaliation against a whistleblower will not be tolerated within the Group. Moreover, filing a report that is later proven to be inaccurate or unfounded does not warrant disciplinary action, provided the whistleblower was in good faith.

Nevertheless, any report made in bad faith with the intention to harm individuals or the Group or whose content was known to be false at the time of the report can be subjected to disciplinary or even criminal action.

How is my confidentiality protected?

Elior Group guarantees the confidential handling of all information collected through the reporting system, which records only the personal data provided by the whistleblower or required for the processing of the report, including all or part of the following information (depending on the data submitted):

- The identity, contact details and position of the whistleblower;
- The identity, position and contact details of any individuals who assisted in submitting the report, where applicable;
- The identity, position, and contact details of the persons concerned by a report;
- The identity, position, and contact details of persons interviewed as part of the report handling process, where necessary;
- The identity, position, and contact details of persons involved in the receipt or processing of the report, where necessary;
- The reported facts;
- The information collected during the verification of the reported facts;
- The report on the verification activities carried out and the follow-up actions taken in response to the report.

Data collected within the European Economic Area will not be transferred to a country outside the European Economic Area unless there is an adequacy decision in place.

The identity of the whistleblower is disclosed within the company, where necessary, only to those individuals who need to know it for the purposes of verifying or handling the report and any resulting actions, and solely after they have signed a specific confidentiality undertaking. Likewise, the whistleblower's identity is under no circumstances disclosed to the individuals concerned by the report.

Except in the circumstances described above, any information that could identify the whistleblower may not be disclosed without their consent, unless disclosure is required by a judicial authority or to comply with a legal obligation.

Similarly, any information that could identify a person named in a report may not be disclosed, except to a judicial authority or to comply with a legal obligation, until the well-founded nature of the report has been established.

How are my data stored and what are my right of access / to rectification?

The data is collected and stored within a restricted-access tool hosted by the external service provider. Access is limited to the relevant licensed Case Managers, who can log in using a username and password.

If a report is submitted through a trusted internal contact, that person will be able to answer any questions relating to data retention arrangements and, more generally, to any matters concerning the collection of personal data.

The data collected will be retained only for as long as is necessary to process the case under review.

The data will be deleted as soon as its retention is no longer required for legal purposes (for example, for the duration of legal proceedings where such proceedings have been initiated) or, where possible, retained in an anonymised form (i.e., with personal data removed or irreversibly neutralised within the retained information).

Furthermore, in accordance with the General Data Protection Regulation ("GDPR"), any individual identified within the reporting system may access the personal data concerning them and, where applicable, request that such data be corrected or deleted.

They may also object to the processing of their personal data, but only within the limits set by Article 21 of the GDPR (meaning that legitimate and compelling grounds may override the interests, rights, and freedoms of the data subject).

However, under the right of access, they may not obtain information relating to third parties, and in particular the identity of the whistleblower.

For any information or to exercise rights relating to the protection of personal data, the whistleblower or any other data subject may contact:
gdpr-contact@eliorgroup.com.

How is the person implicated by the alert informed?

In accordance with the GDPR, the Case Manager shall inform the person concerned by a report within a reasonable period of time, which should in principle not exceed one month. The person concerned shall be informed of the allegations made against them, as well as of the procedures for exercising their rights of access and rectification.

However, information may only be provided to the person concerned after the implementation of any necessary protective measures, where such measures are essential, in particular to prevent the destruction of evidence required for the processing of the report. Furthermore, the information provided to the person concerned shall not contain any details relating to the identity of the whistleblower or of any third parties.

Elior Group also undertakes to apply the principle of proportionality in the event that sanctions are imposed following the confirmation of the reported facts.