



THE GROUP ANTI-HARASSMENT POLICY STATEMENT

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I | Context and scope of application

The Group Anti-Harassment Policy of JCDecaux applies to **all employees of JCDecaux SE and subsidiaries that are controlled by the Group**. Each Business Unit has the responsibility to implement its own Policy in line with the below mentioned commitments and local challenges.

The associates, companies under significant influence and accounted for using the equity method under IFRS, are excluded. For the joint controlled entities accounted for using the equity method under IFRS, the implementation of the Policy should be subject to the validation of the country managing director, the regional managing director (if any) and the member of the Executive Board in charge, in agreement with the partner company.

By all employees, it is meant employees in **permanent contracts, fixed-term contracts, and work-study contracts**¹. External workers working for JCDecaux also undertake to comply with this policy via the signature of the JCDecaux Suppliers' Code of conduct by their company.

¹ This includes students/interns/trainees.



II Purpose of the policy, ambition & necessary terminology

According to the ILO², harassment and violence in the workplace can have serious consequences for victims including mental health issues, physical disorders, reduced self-esteem and damage to their professional lives. However, the effects of harassment and violence in the workplace extend beyond the individual concerned. It can affect witnesses, colleagues, sub-contractors, clients and other stakeholders as well as family members, friends, organisations and society as a whole.

As People and Society are at the heart of the Triple virtuous Business model of the Group³, and are the cornerstone of its responsible activities, JCDecaux has renewed its ambitions first described in its International Charter of fundamental social values (CIVSF)⁴ as early as 2012. With this new **Group Anti-Harassment policy** (the “**Policy**”), the Group is consolidating its global workplace values and culture.

2.1 Purpose of the policy

The purpose of this policy is to prevent and deter any behaviour that is unwanted, unreasonable, demeaning or that harasses others at work. The policy strives for zero harassment and violence in the Group. It is also to promote a safe physical and emotional environment where everyone may engage and collaborate in a culture of mutual respect and trust.

This Policy aims at providing the necessary information to identify, to prevent, to manage incidents of violence and harassment at work and reduce their consequences.

By this policy, JCDecaux recognizes everyone’s responsibility:

- to promote a violence and **harassment-free workplace** and,
- to **speak-up when directly (or indirectly)⁵ witnessing** any type of unacceptable behaviour **without fear of retaliation** and,
- to do so **in good faith** and in a **respectful manner**.

² I.L.O. or International Labor Organization, “Safe and healthy environments free from violence and harassment”.

³ The JCDecaux Business model is recognized virtuous in 3 different ways: 1° **economically** with nearly 50% of the Group resources redistributed to landlords, cities, communities and local authorities; 2° **socioeconomically** with 10 indirect jobs created in the Global economy for every single direct job in the Group; 3° **environmentally** with nearly 50% of the Group revenues aligned with the EU Taxonomy legislation, meaning that JCDecaux’s major business lines promote **eco-friendly mobility** worldwide with bus-shelters, self-service bicycles, land transport.

⁴ International Charter of Fundamental Social Values - *Charte internationale des valeurs sociales fondamentales*

⁵ Indirectly witnessing, when, for example, a colleague speaks about a harassment situation.

2.2 Ambition

As a **Responsible Employer**, JCDECAUX aims to be a company where employees are personally valued, physically and emotionally safe and may contribute to the best of their ability. Our company aims to provide the same opportunities for success to everyone across the world as well as a safe and thriving workplace where people can work together and collaborate.

We believe that only a culture of **mutual respect and trust**, free from bullying, harassment and any kind of violence, where people may speak-up without retaliation is the path forward to inclusion, to enriching our lives and our perspectives and that of our employees and stakeholders.

2.3 Necessary terminology

Workplace

Situations at the workplace comprise those occurring at work, in the course of work and/or because (as a result) of work. For example, situations may occur on the company premises, or in public or private spaces. This may include times when employees are taking a break or having lunch, using the toilets or changing rooms. The same applies to work-related travel, events, social gatherings, training activities or commute. It can also include work-related communication using channels such as emails, phone, video-conferencing, social media. It can arise when conducting business with third parties such as clients, partners and other stakeholders including investors.

NOTE: The definitions of what the workplace consists of, may vary according to local applicable laws.

Employees

By all employees, it is meant employees in permanent contracts, fixed-terms contracts and work-study contracts. External workers working for JCDecaux also undertake to comply with this policy.

Harassment at the workplace

As stated by the ILO Convention C190, "...the term "violence and harassment" in the world of work refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment...".

Harassment behaviour has the effect and/or purpose of breaking someone's dignity, and/or creating a degrading, humiliating and/or an offensive/hostile work environment and/or the effect/ of unreasonably interfering with an individual's work performance and/or negatively impacting the person's employment opportunities. Harassment may impact mental health.

Violence and harassment in the line of work at JCDecaux are not tolerated.

Please refer to the different types of harassment described below.

NOTE: The definitions of harassment, sexual harassment, and discrimination may vary according to local applicable laws.

What harassment is not

Before explaining what harassment may consist in, it is important to note what harassment is not. Harassment may by no means be equated to regular or normal tension management, misunderstandings resolution or “conflict” management which occurs every day between people in an organisation.

For example, tension between people in an organization may occur when:

- A tight deadline is to be met inducing a high level of stress between two people, or between a group of persons involved in the management of a project or in between Departments when a shared project management goes out of schedule.
- Instructions have been provided unevenly to/between the team members who as a result, have a hard time coordinating the task or project.
- The objectives of a task or the phases of a project have not been well designed/anticipated.
- Etc.

How to best solve tensions

Internal organisational tensions that take place between individuals, Departments, etc...are best resolved with **respect** among individuals when:

- role(s) & responsibilities are clear,
- communication across all levels of the organisation is clear, transparent, regular and easy to understand.
- a climate of confidence is established allowing staff to speak-up and express their view without retaliation,
- tensions are dealt with together (vs. unilaterally or top-down only).

NOTE: Teamworking activities, time management programmes, stress coping programmes...may be organised.



² I.L.O. or International Labor Organization, “Safe and healthy environments free from violence and harassment”.

³ The JCDecaux Business model is recognized virtuous in 3 different ways: 1° **economically** with nearly 50% of the Group resources redistributed to landlords, cities, communities and local authorities; 2° **socioeconomically** with 10 indirect jobs created in the Global economy for every single direct job in the Group; 3° **environmentally** with nearly 50% of the Group revenues aligned with the EU Taxinomy legislation, meaning that JCDecaux’s major business lines promote **eco-friendly mobility** worldwide with bus-shelters, self-service bicycles, land transport.

⁴ International Charter of Fundamental Social Values - Charte internationale des valeurs sociales fondamentales

⁵ Indirectly witnessing, when, for example, a colleague speaks about a harassment situation.



III Different types of harassment & how to recognize them

Workplace violence and harassment may take place:

- horizontally – between co-workers,
- vertically – between managers and people in the team,
- or even potentially with a 3rd party involved such as clients, suppliers, partners, bystanders...

In addition to the general definition of harassment outlined above, more specific forms may also arise, and unfortunately sometimes in combination.

As a Responsible Employer, JCDecaux has established a Group Anti-Harassment Policy and tolerates none of what follows.

NOTE: The description of the various types or forms of harassment in this Policy shall not be considered as legal definitions. For legal definitions, the victim shall refer to the applicable country laws, to the HR Director and/or to the employees' representatives when/where applicable. In some countries, harassment may also require the intervention of public authorities.

3.1 Sexual harassment

Sexual harassment is any unwelcome, uninvited, or non-consensual behaviour of a sexual nature that could offend, demean or humiliate an individual. It also occurs when acceptance or rejection of such behaviour is used—explicitly or implicitly—as a basis for decisions that affect a **person's job**, or when it creates an intimidating, **hostile, or humiliating work environment**.

Sexual and gender-based harassment may be **physical, verbal, written, or visual, and may occur as a single incident or repeatedly over time**.

3.2 Gender-based harassment

Gender-based harassment differs from sexual harassment in that it is not typically motivated by sexual interest or intent. Instead, it reinforces sex stereotyping, gender roles, and gender expression⁶. For example, a male colleague asking female colleagues for hugs in the workplace is considered gender-based harassment.

Like sexual harassment, gender-based harassment can be physical, verbal, written, or visual, and may occur as a single incident or repeatedly over time.

3.3 Discriminatory harassment

Discrimination occurs when a person or a group is denied equal treatment in the workplace and relates to terms, conditions or privileges of employment based on one (or more) personal characteristics such as gender, race, religion, age, disability, gender identity, sexual orientation, or any others protected by law. Unfair treatment might relate to any phase of an employee's life cycle such as hiring, promotion, training, scheduling, pay or termination.

Discrimination may be direct (when someone is treated unequally because of personal characteristics that are protected by law) or indirect (when workplace rules, practices, or conditions affect the chances of an individual or a group being treated equally).

How to differentiate between harassment & discriminatory harassment?

Harassment represents a malicious attack and aims at affecting the dignity or health of a person vs. **discrimination** which is the result of unequal treatment based on **personal characteristics** (i.e. gender, race, religion, age, disability, gender identity, sexual orientation, or any others protected by law).

3.4 Bullying (one person vs. another) or mobbing (two people or more vs. one person)

Bullying is a form of aggressive behaviour that is **repetitive, unreasonable** which intends to intimidate and/or psychologically harm or create a risk to the health and safety of a person and where an **imbalance of power** is involved. Power does not always mean being in a position of authority but can also include both personal strength and the power to coerce through fear and intimidation.

Bullying may be **physical, verbal, relational** and may occur remotely through **cyberbullying**. Therefore, bullying might be highly visible (i.e. slapping someone) but also be subtle and/or invisible when **emotional abuse** is exerted such as threatening, intimidating and/or humiliating and/or even talking about someone behind their back. Bullying takes place over repeated actions and/or threats.

When conducted by a group targeting an individual, this kind of harassment is called **mobbing**. Mobbing may occur for example in the case of discrimination, in the case of cultural and language differences, in the case of a group of workers perceived as more vulnerable than others, etc.

3.5 Physical harassment (otherwise called “violence”)

Physical harassment consists of assault, humiliation and/or physical threat in situations relating to work that may unfortunately, occur at the workplace. Examples of physical violence may include hitting, kicking, slapping, pushing, biting, throwing objects, etc.

Despite the Group's best efforts, it is possible that a physical attack could happen to work colleagues. The situation might be one of **urgent nature**. Therefore, the Group wants to ensure that support is readily available if such a situation should occur. If an employee should have any physical harassment or violence concerns, please **immediately** reach out to the HR team or an appropriate manager.

3.6 Psychological harassment

Psychological harassment in the line of work consists of repeated words, actions or behaviours that are **hostile** that are **intentional** and that may **undermine the dignity** or **psychological integrity** of any person.

It occurs over a period, in a **systematic** or **repetitive** fashion (i.e. exclusion or isolation of a person, microaggressions, damaging a person's reputation, slandering and ridiculing, verbal abuse, mobbing, bullying and cyberbullying etc.).

⁶ University of Illinois, Chicago definition of gender-based harassment.

3.7 Verbal harassment

Verbal harassment may consist of threatening, insulting or swearing at an individual in public or in private.

In some circumstances, the tone that is used or the way that something is said (for example, yelling) can be as humiliating or degrading as the words themselves.



IV | Rights and responsibilities

4.1. Aiming at a “no harassment” culture

On the one hand, future and current **employees** at JCDecaux:

- accept to comply to all rules, charters and values of the Group⁷,
- are recruited, compensated and promoted based on competencies and performance, and are provided with development opportunities,
- are treated fairly and equally in a safe work environment free of harassment,
- are able to share and be themselves at the workplace,
- are able to voice out concerns -and issues such as harassment and violence- as **proactive actors** of a “No Harassment” culture, in a professional manner, in good faith and thus, in a **non-abusive fashion** (see paragraph 4.2) through the available reporting channels.

On the other hand, as a **responsible employer**, the Group wishes to make sure that:

- this Policy is **available and known** to all everywhere including external employees to JCDecaux but working for JCDecaux and stakeholders so that the company’s values are known, recognized and implemented,
- this Policy is **enforceable and adapted** as per local legislation and constraints,
- employees are made aware through **training** and aligned with the Group core values and leadership expectations concerning the alignment of everyone in the organization to the policy,
- employees are **protected against retaliation** when reporting in **good faith**,
- employees who have been recognized as having harassed, are **sanctioned accordingly** as per their contract, internal rules and procedures and local legislation,
- employees feel **free to share** without fear and may voice their doubts or concerns -and in matters besides harassment -**share their ideas** so that all benefit.

⁷ Such as: “Règlement intérieur”/Employees’ Handbook, Group Code of Ethics , International Charter of Fundamental Social Values, Group Social Policy, the Group Personal Leave Policy, the Group Professional Equality Policy, Code of Conduct for Out-of-Home display, IT Charter etc.: See Group [Codes & Charters](#)

4.2 Responsibilities of employees

While carrying out their work duties, employees must behave in accordance with the Group values and behaviours, comply to the Charters and Policies and respect their own rights and those of their colleagues. The aim is to create an environment that is free of unacceptable behaviour such as violence and harassment.

The Group asks all employees to be **proactive participants** in a workplace free of violence and harassment and to **speak-up** of a potential situation – **whether as a recipient or witness** (direct or indirect) – even when they are not sure if there has been a breach of the policy.

To implement this commitment worldwide, JCDecaux is introducing the following clause in all work contracts as of January 1st, 2026:

Article X – Violence at work, moral/psychological, digital as well as sexual harassment and sexist behaviour.

“JCDecaux X is actively involved in the fight against moral/psychological, as well as sexual harassment, sexist comments and actions, discrimination based on gender or personal orientations, and more generally against any form of violence at work. As such, [First name] [Last name] undertakes to read, scrupulously comply with the rules set out in the JCDecaux Group's Anti-Harassment policy and to inform the company, where appropriate, of these prohibited behaviours that he/she may have observed or of which he/she has become personally aware. He/she will also be required to complete any training requested in relation to these topics.

Contravening these rules, and more generally the obligations and good practices derived from the Group Anti-Harassment Policy, may result in disciplinary sanctions and in potential legal action.”

NOTE: For Protection against retaliation and good faith reporting, see paragraph 5.4.

All employees will be trained accordingly on the Anti-Harassment policy and its implementation.

4.3 Responsibilities of HR Partners & Managers

In addition to the paragraph above, employees working in leadership, HR and management positions have an obligation to **role model** the appropriate Group Anti-Harassment behaviours as well as **act in line with the Group values**. They should do their utmost to prevent, to address and to manage unacceptable behaviour when/if encountered.

It is important that Managers and HR Partners **discourage unacceptable behaviour** and inform/train their teams and make their people aware of their responsibilities as outlined in this Policy. To meet these expectations, they must be trained so they can identify inappropriate behaviour, act fairly to resolve issues and take action in a timely fashion to report breaches – or potential breaches. They should be aware of how and when to seek further guidance (HR/ Legal & Compliance/Country Compliance Referent⁸) if/when needed as well as, implement or follow-up on corrective action in case of breach. They should also promote the use of the WHISPLI platform to report. The Group has planned a specific training for Managers worldwide, on how to implement the Group **Anti-Harassment policy**.

⁸ At JCDecaux, the local Compliance Director, Manager, Lead.



V | Complaints & reporting mechanisms

5.1 Speaking up

First and foremost, the **Group Anti-Harassment policy** calls for a **duty to speak-up**, as employees (and stakeholders) are also in the forefront of unacceptable behaviour. As of January 1st, 2026, a clause to this effect is introduced by the Group in every employee's work contract.

5.2 Channels of reporting

Multiple channels may be used to report, some more formal than others.

First, available to raise harassment and violence issues is the WHISPLI platform, an external services provider, ISO 27001 certified, that collects and processes reports from employees and stakeholders: [Whistleblowing Platform - Plateforme de signalement.url](https://whistleblowingplatform.com)

The platform is operational in 18 of the Group main languages and is accessible via the Compliance pages of the Group through the local intranet sites and websites. The JCDecaux's employees, candidates, shareholders etc. but also, external stakeholders such as co and sub-contractors, visitors, etc. have access to WHISPLI.

Via the WHISPLI platform, **the whistleblower may exercise either one of the following options: identify him/herself or make an anonymous report.**

Please note that if the report is made anonymously, the IP address remains confidential, whether the report is made on a work or personal device. JCDecaux cannot access this information.

For employees who do not have a personal JCDecaux email address or who cannot access a computer, a specific communication is being deployed for display in the Group business premises, with the ability to connect to the platform via a QR code from any personal electronic device.

When possible, a report should include details of the incident(s), name of the person(s) involved as well as of the (potential) witnesses(es). Please refer to the Procedure for Collecting & Processing Reports - [Procédure de Recueil et de Traitement des Signalements for further information.](#)

When possible, a report should include details of the incident(s), name of the person(s) involved as well as of the (potential) witnesses(es). Please refer to the Procedure for Collecting & Processing Reports - Procédure de Recueil et de Traitement des Signalements for further information.

If you wish to make a report, you may also speak to:

- an **HR partner**,
- a representative of the **Legal Team**,
- a **regional/country Compliance Referent**,
- a **trusted Manager**,
- as well as to an employee representative, where/if applicable

The report might be given orally, by mail, letter, telephone...If a statement is given **orally**, the employee may also be asked to fill out a **written statement** on WHISPLI during the investigation (see Note 1. below).

If the recipient of the statement assesses the complaint as potentially unacceptable behaviour, and it is confirmed, if necessary, by a legal analysis, the case is escalated to the investigation phase and processed accordingly. In any case, the recipient of the statement, has the duty to make the Regional or Country Compliance Referent aware of the complaint and a WHISPLI file is opened for investigation and reporting purposes.

Note 1.

You have the option to report directly to your immediate supervisor as an employee of the JCDecaux Group. Your supervisor will review your report in strict confidence, except for a report he/she will prepare for the Compliance Referent. You will then be asked to formalize your report through the WHISPLI secure platform for processing.

Note 2.

Depending on the applicable regulations in your country, the option to report via a dedicated telephone system may be available. The conversation will then be recorded on a durable and retrievable medium, and the corresponding data will be stored under the security and confidentiality conditions in this procedure.

Note 3.

Alternatively, to reporting via WHISPLI (the JCDecaux's Whistleblowing system) and in accordance with European regulation, you have the option to make an external report by directly contacting (i) the competent authority*, (ii) the defender of rights, (iii) the judicial authority, or (iv) an institution, body, or agency of the European Union competent to collect information on violations of European Union Law.

*List of Competent External Authorities for France Detailed in Decree No. 2022-1284 of October 3, 2022, Regarding Procedures for Collecting and Handling Reports Issued by Whistleblowers and Establishing the List of External Authorities Instituted by Law No. 2022-401 of March 21, 2022, Aiming to Improve the Protection of Whistleblowers

5.3 How is an allegation of harassment and/or violence handled?

The objective of the policy is to deter unwanted, unreasonable and demeaning behaviour. Hence, a submission is always taken very seriously, impartially, thoroughly and in respect of applicable (local) legislation whichever the reporting channel used.

The precise terms of access to the WHISPLI service, the rights and guarantees given as well as the conditions for processing and monitoring an alert are detailed in several procedure documents (see [Procedure for Collecting & Processing Reports - Procédure de Recueil et de Traitement des Signalements](#)) that are available on the home page of the WHISPLI platform as well as on the Group local intranet sites and Group compliance website, incorporating the specific requirements of local law when necessary.

Admissibility & processing of the report

- You will be promptly notified, and at the latest within a period of 7 Business days, of the receipt of your report through a dated and signed acknowledgement receipt. The acknowledgement does not imply the admissibility of the report. A report is deemed inadmissible when it clearly falls outside of the alert system criteria. If the report is deemed inadmissible, you will be informed of the reasons justifying this inadmissibility.
- All actions taken in the processing of your alert, especially in the case of a thorough internal investigation, will be conducted **in accordance with the JCDecaux Group's International Investigation Procedure, according to modalities and guarantees compliant with the legal framework.**
- Within a **maximum period of 3 months from the date of sending the acknowledgement of receipt**, depending on the seriousness of the reported facts and the conclusions of the internal investigation, provided that the report is not anonymous and is deemed admissible, you will be informed of the measures envisaged or taken to remedy the situation and of the closure of your file.

Respect the confidentiality of the report

- In accordance with the regulations in force, this Whistleblowing system ensures **strict confidentiality** of both **your identity as the author of the report, the identity(ies) of the person(s) targeted by your alert**, any person mentioned therein, the facts subject to the report, and, generally, **all information** disclosed.
- **Any individual with access to information within the scope of this alert procedure, its processing, and related investigations, is bound by a strict obligation of confidentiality.**
- **The elements that could identify you as the whistleblower cannot be disclosed without your consent, except if the person responsible for collecting and processing reports is required to report the facts to the judicial authority. In this case, you will be informed in writing, unless such information is likely to compromise the judicial procedure. Similarly, the elements that could identify the person(s) targeted by your report cannot be disclosed until the validity of the alert is established.**
- Persons disclosing confidential information are liable to legal action, **with penalties determined by the specific local laws applicable to the subsidiary and/or disciplinary sanctions.**

Obstruction of a report

- Any person who obstructs, in any way, the transmission of a report is liable to legal action, with **penalties determined by the specific** local laws applicable to the subsidiary **and/or disciplinary action**.

5.4 Protection for those reporting “in good faith”

Reporting of violence and harassment is a duty for all employees in the Group and must be carried out in **good faith** without **dishonesty, abusive or false reports**. In doing so, it is also important that **confidentiality is respected** and that no gossip takes place. **Slandering** - if the slander is **proven- is not acceptable** and will be sanctioned by the Group that may use corrective action, disciplinary and/or legal action up to termination.

5.5 Remediation measures (measures to protect the alleged victim)

In case of emergency and/or when an employee safety, health and/or capacity to perform is affected, the Group may offer if/when applicable:

- distancing measures,
- temporary accommodations,
- location change or flexi time arrangements,
- change of function/service/reporting line,
- psychological support...

This list is non exhaustive.



VI | Investigations & sanctions

Once a report is declared worth consideration and an allegation of “undesirable” behaviour is declared, a detailed investigation is launched. This is carried out by the designated investigation team following the Group’s internal enquiry process as detailed in Procedure for Collecting & Processing Reports - Procédure de Recueil et de Traitement des Signalements.

The process is similar to WHISPLI’s, regardless of the reporting channel. Each investigation team is led by the Compliance Referent for the relevant country/region and includes people from HR, Legal & Compliance and when necessary, external experts.

The investigation is carried out in an independent and objective manner.

The investigation team observes strict **confidentiality, impartiality** and respects the personal information as well as the rights of the person accused. **Employees solicited by the investigation team must cooperate** fully and maintain **strict confidentiality**. Witnesses are also fully protected from any kind of retaliation.

Where a case of violence and/or harassment is recognized, **measures** might be applied, as follows:

- **corrective action** (behavioural managerial development, training ...) and/or
- **disciplinary measures** (verbal or written warning, change of role, ...) and/or
- **legal action** up to and including termination.

This list is non exhaustive.

Sanctions are proportionate to the misconduct and may vary as they will be determined in accordance with the relevant local Labour laws.

The whistleblower is informed of the overall result of his/her report however, details of the case remain strictly confidential.



VII | Retaliation & confidentiality

Protection against retaliation

JCDecaux prohibits retaliation of any kind against anyone who reports an issue regarding this Policy in **good faith** and who participates in the investigation in **good faith** -even if the report is proven inconclusive- by the investigation team.

What follows is the illustration of the WHISPLI procedure:

Absence
of retaliation
following a
report

- The Group will not exercise, nor tolerate, any sanction, **dismissal or discriminatory measure**, whether direct or indirect, against a whistleblower acting in good faith within the scope of this procedure, even if the reported facts subsequently prove to be inaccurate or do not lead to any further action.
- Likewise, an individual **cannot be excluded from a recruitment process, access to an internship, or a period of professional training**, due to a report made within the scope of this procedure.
- **Are protected also (i) facilitators, meaning any natural or legal person of private law with non-profit purpose who undertakes to assist the whistleblower in making their report, (ii) individuals associated with the author of the report (i.e., those who might be subject to retaliation in the course of their professional activities, client, or recipients of their services), and legal entities controlled by the author of the report, for which the latter works or with which they are associated in a professional context.**

Confidentiality

All reports are handled confidentially, in line with the Group's whistleblowing policy and local rules as detailed here: [Privacy policy JCDecaux Group of Whistleblowing system - Politique de confidentialité du Groupe JCDecaux du système d'alerte](#). The processing of **personal data** is carefully handled. For example, if a report is made anonymously, **the IP address or any other personal information will remain inaccessible to the investigators handling the case.** (For further information see p.13 of this document).

As with other internal reporting channels, strict confidentiality is maintained throughout the investigation for the **alleged victim**, for the **witness** as well as for the **person accused**. **Witnesses must** cooperate with the investigation and maintain confidentiality regarding the facts and the people involved.





VIII | Deployment & performance monitoring of the policy

From 2026, the Group will enforce the **Group Anti-Harassment policy** and include a clause about the policy in all work contracts around the world. In addition, the Group will provide **mandatory training** for all employees on what constitutes harassment, how to prevent harassment and how to deal with harassment appropriately. Training will be tailored according to their level of exposure and level of responsibility and will take place both during on-boarding and/or as compulsory training.

In some subsidiaries, a **local** anti-harassment reglementary diagnosis is already implemented, an action plan derived and implemented and contributes to the Group's objectives described above.

The performance monitoring of the objectives of this policy is carried out as part of ESG reporting. Some of the tracked key indicators are reported internally as well as externally.



IX | Enforcement & governance of the policy

The governance of this Policy follows the same framework as established in the JCDecaux Group Social Policy. By all employees, this means employees described in the 1. Context and scope of application paragraph (PLS see above).

Where local regulations provide rules or practices that are **more favourable to employees or other stakeholders** than those contained in this Policy, the local regulations take precedence and will be applied by the relevant JCDecaux entity and jurisdiction. If a local practice is perceived as an issue due to local culture/mindset, local organisation or constraints or is not permissible due to a local law or regulation, the local entity shall inform the Group HR Department to deploy the commitment in a manner which is locally compatible and permissible.

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Professional Equality Policy statement

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