

# The **WALT DISNEY** Company And Affiliated Companies

This policy provides details on how you can report unethical, improper, or illegal behavior or questionable activities regarding Disney's business, including where you might have concerns about an employee or Cast Member's conduct with respect to the business.

It sits alongside the Employee Policy Manual, Standards of Business Conduct, the Employee Data Protection Notice, which are applicable to you according to the Disney entity that employs you. The employing Disney entity is the data controller of your personal information regarding your employment – please contact your local Human Resources if you have any questions about your employing entity.

When you have a concern or a question, you can:

- Talk to your local Line Manager.
- Contact your local Human Resources.
- Contact the local Legal Department.
- Contact the local Compliance Committee, if appropriate.
- Contact the **Guideline**.

To contact the Guideline, please use the details listed for your country in the Appendix A to this policy.

## **WHAT IS THE GUIDELINE?**

The Guideline is a phone line that provides employees and Cast Members with a way to:

- Make the Company aware of any questionable activities regarding the Company's business. **Please refer to "What can be reported to the Guideline?", below, and the Appendix A to this policy for further information.**
- Ask for guidance on any business conduct related issues.

The Guideline is available 24 hours a day, 365 days a year.

## **WHAT CAN BE REPORTED TO THE GUIDELINE?**

What can be reported to the Guideline varies from country to country due to different national laws. This being the case, **it is important that you consult Appendix A to this policy** to determine what you can and cannot report.

The Guideline should not be used to report trivial or minor issues.

If you are unsure about what you can report to the Guideline, or wish to report something not covered by the Guideline, you should speak to your Line Manager, Human Resources and/ or the Legal Department as appropriate. Please note that such reports are not covered by this policy.

Abuse of the Guideline reporting system by making a report known to be false may result in disciplinary or legal action being taken against you.

### **HOW WILL MY INFORMATION BE USED BY THE GUIDELINE?**

We will use the information you provide to assess your concern and take action as necessary.

The details of your report will be kept confidential. However, where it is reasonably necessary and appropriate, we will share reports made to the Guideline and the results of investigations of such reports on a need-to-know basis with other persons whose assistance is required, (e.g., security department or Legal Department of your local organization or, in exceptional cases, with other affiliated companies, or outside counsel). The extent of sharing of your personal information in such circumstances will be proportionate to the need to share such information and will take into account the seriousness of the misconduct alleged and the legitimate interests of all concerned parties.

In addition to the details of your report, you are strongly encouraged to provide certain personal information, including your identity, to assist in our investigations and our compliance with law. Providing this information will enable us to investigate your concerns effectively. Where you provide your personal information as part of a report, your identity will remain confidential and will not be disclosed to persons about whose conduct a report is made, but may need to be disclosed to personnel of the organization involved in dealing with or investigating your concern, such personal is held to the strictest confidentiality and receives special training. In certain circumstances, including where we bring formal proceedings against a perpetrator, we may be compelled by applicable laws to disclose your personal information to the perpetrator, in which case we will first ensure that such disclosure is permitted by the national law and then inform you in advance of the identified disclosure. In any other case, we will disclose your personal information to a person about whose conduct a report is made only with your explicit consent.

For further information and guidance on how we process and handle your personal information, please refer to the policies linked above.

### **WHAT WILL HAPPEN AFTER I MAKE A REPORT?**

The Company strictly prohibits any form of retaliation against anyone who in good faith makes a complaint or reports any suspected wrongful conduct to the Company, including any disciplinary action, dismissal, transfer or change of role or refusal of promotion.

How the report is processed varies from country to country due to different national laws. This being the case, **it is important that you consult Appendix A to this policy** to understand how it is processed.

### **HOW LONG WILL WE RETAIN YOUR REPORT?**

If you report behavior or activities that are not covered by the scope of this policy, we will immediately delete, or anonymise and archive, the information you provided.

If, after investigation, no disciplinary or judicial actions are taken, we will delete, or anonymise and archive, the information provided in your report within two months of the end of the investigation.

Where any disciplinary or judicial actions are taken, we will keep the information provided in your report until the expiration of our records retention schedule for such information.

**Further details**

We ensure that all data processing systems (both automated and manual) used in connection with the Guideline provide for adequate technical and organizational precautions to preserve security and confidentiality of personal information and to avoid accidental or unlawful destruction or accidental loss and unauthorized disclosure to third parties, in accordance with applicable laws and regulations.

The Guideline is administered from the United States by NAVEX Global, Inc. in accordance with the instructions of your employing entity. The data will be transferred to the United States under the execution of the Disney Intra-Group Agreement for Transfers of Personal Data (May 2018) based on model clauses 2004/915 EC.

**Appendix A**  
**Scope of Guideline Reports**

Country	What types of issues can be reported?	About whom can reports be made?	Telephone numbers for the Guideline (See footnote for dialling instructions.) <sup>i</sup>
Austria	Questionable activities in the fields of accounting, internal accounting controls, auditing matters, corruption, banking, and financial crime including severe infringements of other rules and regulations (including the Company's code of conduct).	Senior staff or grave allegations concerning all staff.	AT&T: 0800-200-288  Guideline: 800-699-4870
Belgium	Any acts or issues which constitute (i) a serious breach of the law, or (ii) a serious threat to the Company's legitimate interests or to the sound structure of the Company which it is not possible to deal with through normal reporting channels (e.g. theft where it is not possible to report the matter through the normal reporting channels because the issue concerns the normal manager about whom report would be made or because it has been reported and not addressed properly). Such matters would include reports on questionable activities in the fields of accounting, internal accounting controls, auditing matters, corruption, banking, and financial crime. Matters may only be reported to the United States Guideline manager if they cannot be dealt with at a local or EU level or the impact exceeds the Belgian or EU organisation. See Appendix B for further details.	All Company staff.	Report to local HR.
Czech Republic	There are no restrictions on the subject matter of reports under Czech law.	There are no restrictions on the personnel about whom a report can be made under Czech law.	Direct Dial Guideline: 800-143-385
Denmark	Severe offences which may have an impact on the company as a whole or	Any person connected to the Company (i.e.	AT&T: 8001-0010

	<p>be imperative to a person's life or health, e.g. serious financial crime, bribery, fraud, forgery, environmental pollution, serious breach of the safety of workers, violence and sexual violations.</p> <p>Such offences would include reports on questionable activities in the fields of accounting, internal accounting controls, auditing matters, corruption, banking, and financial crime.</p> <p>Minor offences (such as thefts from stores) and sensitive personal information should not be processed through the Guideline.</p>	<p>employees, board members, suppliers, lawyers and accountants).</p>	<p>Guideline: 800-699-4870</p>
Dubai	<p>There are no restrictions on the subject matter of reports under UAE law.</p>	<p>There are no restrictions on the personnel about whom a report can be made under UAE law.</p>	<p>AT&amp;T: 8000-021</p> <p>Guideline: 800-699-4870</p>
Finland	<p>The subject matter of reports must relate to the Company's operations. Other than this, there are no restrictions on the subject matter of reports under Finnish law.</p>	<p>There are no restrictions on the personnel about whom a report can be made under Finnish law.</p>	<p>AT&amp;T: 0-8001-10015</p> <p>Guideline: 800-699-4870</p>
France	<p>Reports on:</p> <ul style="list-style-type: none"> <li>(i) a crime or offence;</li> <li>(ii) a manifest and serious infringement of any international commitment duly ratified or approved by France;</li> <li>(iii) a manifest and serious infringement of any unilateral act enacted by an international organisation adopted on the basis of an international commitment duly ratified or approved by France;</li> <li>(iv) a manifest and serious violation of laws and regulations;</li> <li>(v) a serious threat or damage to the public interest of which you have had personal knowledge; and</li> </ul>	<p>There are no restrictions on the personnel about whom a report can be made (e.g. employees, including ad-hoc consultants/agents).</p>	<p>Direct Dial Guideline: 0800-90-6152</p>

	<p>(vi) the existence of behaviors or situations contrary to the company's code of conduct, with respect to corruption or traffic of influence, as soon as the processing is implemented by the data controller to comply with any legal obligation or to pursue its legitimate interest.</p> <p>Reports must not relate to facts protected by national defence secrecy, medical secrecy or legal professional privilege.</p> <p>See Appendix C for further details.</p>		
Germany	<p>Reports relative to financial security in financial markets, internal accounting controls, auditing, bribery, banking and financial crime, prevention of fraud, insider trading, any acts against human dignity, the German Equal Treaty Act (<i>Allgemeines Gleichbehandlungsgesetz</i>), protection of the environment and acts affecting the Company's ethics rules.</p>	<p>Any person connected to the Company (i.e. employees, board members, suppliers, lawyers and accountants).</p>	<p>Direct Dial Guideline: 0800-180-7608</p>
Greece	<p>Questionable activities in the fields of accounting, internal accounting controls, auditing matters, corruption, banking, and financial crime. Reports may also concern violations of applicable law and internal policies.</p> <p>Reports cannot include sensitive data, namely, information in relation to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, social protection, sexual life, criminal prosecutions or criminal convictions.</p>	<p>There are no restrictions on the personnel about whom a report can be made under Greek law.</p>	<p>AT&amp;T: 00-800-1311</p> <p>Guideline: 800-699-4870</p>
Hungary	<p>Questionable activities in the fields of accounting, internal accounting controls, auditing matters, corruption, banking, and financial crime, and substantial offences in relation to violations of environmental protection rules and prevention of workplace accidents provided that</p>	<p>There are no restrictions on the personnel about whom a report can be made under Hungarian law.</p>	<p>Direct Dial Guideline: 06-800-20-140</p>

	<p>reports are in relation to material issues.</p> <p>Reports cannot include sensitive data, namely information in relation to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, social protection, sexual life, criminal prosecutions or criminal convictions. <b>See also Appendix C attached.</b></p>		
Ireland	<p>There are no restrictions on the subject matter of reports under Irish law.</p>	<p>There are no restrictions on the personnel about whom a report can be made under Irish law.</p>	<p>AT&amp;T: 1-800-550-000 Guideline: 353-800-699-4870</p>
Israel	<p>Violations of code of ethics, corporate policies, laws and regulations, and prevention of fraud and corruption.</p> <p>Such matters would include reports on questionable activities in the fields of accounting, internal accounting controls, auditing matters, corruption, banking, and financial crime.</p>	<p>Employees</p>	<p>Direct Dial Guideline: 180-941-9858</p>
Italy	<p>There are no restrictions on the subject matter of reports under Italian law.</p>	<p>There are no restrictions on the personnel about whom a report can be made under Italian law.</p>	<p>Direct Dial Guideline: 800-787634</p>
Luxembourg	<p>Questionable activities in the fields of accounting, internal accounting controls, auditing matters, corruption, banking, and financial crime (but also any other type of infringement if the Company's vital interest or the physical or moral wellbeing of the staff is threatened).</p> <p>Reports cannot include sensitive data, namely, information in relation to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, social protection, sexual life, criminal prosecutions or criminal convictions.</p>	<p>All company employees whose activities are related to the permissible issue types.</p>	<p>AT&amp;T: 800-2-0111-352  Guideline: 800-699-4870</p>

Netherlands	There are no restrictions on the subject matter of reports under Dutch law.	There are no restrictions on the personnel about whom a report can be made under Dutch law.	Guideline: 0800-4444-002
Norway	There are no restrictions on the subject matter of reports under Norwegian law.	There are no restrictions on the personnel about whom a report can be made under Norwegian law.	AT&T: 800-190-11  Guideline: 47-800-699-4870
Poland	There are no restrictions on the subject matter of reports under Polish law other than that reports must not relate to banking secrets, telecommunications secrets, trade secrets and issues covered by legal professional privilege.	There are no restrictions on the personnel about whom a report can be made under Polish law.	Direct Dial Guideline: 0-0-800-111-1986
Portugal	Questionable activities in the fields of bookkeeping, internal accounting controls, auditing matters, corruption, banking, and financial crime. <b>Note:</b> No anonymous reports allowed.	Employees in managerial positions and who are involved in decisions on bookkeeping, internal accounting controls, auditing matters, corruption, banking, and financial crime matters.	AT&T: 800-800-128  Guideline: 800-699-4870
Russia	Russian laws do not provide for any specific restrictions on the subject matter of reports to be made pursuant to this policy.	Russian laws do not provide for any specific restrictions on the personnel about whom a report can be made.	AT&T: 363-2400 (Moscow)  Guideline: 800-699-4870
South Africa	There are no restrictions on the subject matter of reports under South African law.	There are no restrictions on the personnel about whom a report can be made under South African law.	Direct Dial Guideline: 0800-99-9673
Spain	The commission of acts or conduct, either inside the Company or when engaging with third parties, that may be contrary to the general or sector specific legislation applicable to the Company. This includes, among	Employees and third parties engaging with the Company.	Direct Dial Guideline: 900-97-1014



	others, questionable activities in the fields of accounting, internal accounting controls, auditing matters, corruption, banking, and financial crime.		
Sweden	<p>Serious improprieties concerning accounting, internal accounting controls, auditing matters, bribery, banking and financial crime; or other serious improprieties concerning the vital interests of the organisation or the life and health of individuals, such as serious environmental crimes, major deficiencies as regards security in the workplace and very serious forms of discrimination or harassment.</p> <p>Except for criminal offences, no sensitive personal data may be reported. Under EU law (the GDPR), sensitive data are defined as information relating to race or ethnic origin, political opinions, religious or philosophical beliefs, membership of a trade union, health, sex life or sexual orientation, as well as genetic and biometric data.</p>	People in key or management positions within the Company or its group.	<p>AT&amp;T: 020-799-111</p> <p>Guideline: 800-699-4870</p>
Switzerland	Questionable activities in the fields of accounting, internal accounting controls, auditing matters, corruption, banking, and financial crime and any other Company-related activities that appear to violate law or company directives. No minor issues may be reported.	Employees, business partners, customers and other third parties.	<p>AT&amp;T: 0-800-890011</p> <p>Guideline: 800-699-4870</p>
Turkey	There are no restrictions on the subject matter of reports under Turkish law.	There are no restrictions on the personnel about whom a report can be made under Turkish law.	<p>AT&amp;T: 0811-288-0001</p> <p>Guideline: 800-699-4870</p>
UK	There are no restrictions on the subject matter of reports under UK law.	There are no restrictions on the personnel about whom a report can be made under UK law.	<p>Direct Dial Guideline: 0808-234-6062</p>

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<sup>i</sup> The dialling instructions contained in this footnote **do not apply** to the following countries because employees may reach the Guideline from these countries by dialling direct using only the listed Guideline telephone number: **Czech Republic, France, Hungary, Israel, Italy, Netherlands, Poland, South Africa, Sweden, Spain, and the U.K.**

**Dialling instructions for employees in countries other than those listed in the footnote**

**hereinabove:** The Disney Guideline telephone number is provisioned for toll-free international calling through AT&T's Direct Access Service. You must first dial the AT&T access number listed for your convenience which is specific to the country from which you are calling. This number will connect you to an AT&T center in the United States.

You will then hear a musical tone and an AT&T branding statement: "(bing) AT&T." After hearing this tone, you will dial the Guideline number listed, and AT&T will connect your call to Global Compliance in the United States.

## Appendix C

### **Once you have made your report**

Acknowledgement of safe receipt of your report will be given to you with the information on the reasonable and predictable time period required for the examination of admissibility, based on the reported facts. You will be also informed of the actions taken following the admissibility and of whether or not an investigation is necessary.

Within two months of the closure of the investigation, you will be informed if the file is closed without follow-up or if it is subject to disciplinary or judicial proceedings.

At the end of the disciplinary or judicial proceedings, only the results will be communicated to you.

Should no actions have been taken in examining the admissibility of the report within the prior communicated period of time, you can disclose the report with the judicial or administrative authority or the professional corporation. Should none of these authorities process the report within a three-month period, you can disclose it publicly. Exceptionally, in the event of a serious and imminent danger or the risk of irreversible damages, you can directly disclose your report to the above-mentioned authorities and to the public.

The Head of Legal Department of your employing entity will inform the person subject of the report at the time of the recording of the data, in order that he or she can object to the processing of his or her personal data. When protective measures are necessary, in particular to prevent destruction of evidence related to the report, this person will be informed after these measures have been taken.

Should the report not be followed by disciplinary or judicial proceedings against the person subject of the report, he or she will be informed that the reported facts have not been considered as established, within two months of the closure of the investigations. He or she will also be informed, as the case may be, that the report was abusive, and that judicial proceedings and/or other appropriate actions have been taken against the author of the report (whose identity will nonetheless not be disclosed).

Elements that might allow the author to be identified, cannot be disclosed, except to judicial authorities, without the author's consent. Elements that might allow the person subject of the report to be identified, cannot be disclosed, as long as the grounds of the report have not been established, except to the judicial authority.

The information collected within the framework of this system will be communicated solely to your employing entity, TWDC and the Guideline provider, Navex Global, Inc, located in Lake Oswego, Oregon, United States, for the purpose of managing and processing of the professional alerts. According to the provisions of French law n°78-17 of January 6, 1978 on Data Processing, Data Files and Individual Liberties, as amended, and the General Data Protection Regulation 2016/679, any person identified within the system has the right to access, correct and delete personal information relating to herself. You can exercise these rights by contacting directly your dedicated

point of contact in your employing entity (see the Employee Data Protection Notice of your employing entity).

For The Walt Disney Company France: Employees are directed to [DToolsHR.disney.com](https://DToolsHR.disney.com) to self-serve or contact HR on [TWDC.EMEA.GDPR.Enquiries@disney.com](mailto:TWDC.EMEA.GDPR.Enquiries@disney.com).

In addition: [EMEA.Data.Protection.Office@disney.co.uk](mailto:EMEA.Data.Protection.Office@disney.co.uk) is available for internal requests. [dataprotection@disney.co.uk](mailto:dataprotection@disney.co.uk) is available for external requests.

For Euro Disney Associés SAS: Employees are invited to use the following address: [dlp-donneesperso-cm@disney.com](mailto:dlp-donneesperso-cm@disney.com).

## Appendix C

### **Une fois que votre alerte est effectuée**

Un accusé réception de l'alerte vous sera délivré, indiquant le délai raisonnable et prévisible nécessaire à l'examen de sa recevabilité, qui sera fonction des faits signalés. Vous serez informé également des suites données quant à cette recevabilité et la nécessité de diligenter une opération de vérification.

Dans un délai de deux mois à compter de la clôture des opérations de vérifications, il vous sera précisé si le dossier est classé sans suite ou s'il fait l'objet d'une procédure disciplinaire ou judiciaire.

Au terme de la procédure disciplinaire ou judiciaire, seuls les résultats de celle-ci vous seront communiqués.

Ce n'est qu'en l'absence de diligences quant à l'examen de la recevabilité à l'issue du délai d'examen préalable communiqué, que vous pourrez adresser le signalement à l'autorité judiciaire ou administrative ou aux ordres professionnels. Ce n'est qu'à défaut de traitement par l'une de ces autorités dans un délai de trois mois que vous pourrez le rendre public. A titre exceptionnel, en cas de danger grave et imminent ou en présence d'un risque de dommages irréversibles, vous pourrez le porter directement à la connaissance de ces organismes et du public.

C'est le Responsable de la Direction Juridique de l'entité qui vous emploie qui informera la personne qui fait l'objet du signalement dès l'enregistrement de données la concernant afin de lui permettre de s'opposer au traitement de ses données. Lorsque des mesures conservatoires sont nécessaires, notamment pour prévenir la destruction de preuves relatives à l'alerte, l'information de cette personne intervient après l'adoption de ces mesures.

Dans le cas d'une alerte non suivie d'une procédure disciplinaire ou judiciaire à l'encontre de la personne ayant fait l'objet de l'alerte, celle-ci sera informée de ce que les faits dénoncés n'ont pas été avérés, dans un délai de deux mois à compter de la clôture des opérations de vérification. Elle sera également informée, le cas échéant, du caractère abusif de l'alerte dont elle a fait l'objet et de l'existence de poursuites judiciaires et/ou toutes autres mesures appropriées prises à l'encontre de l'auteur de l'alerte (sans toutefois révéler l'identité de ce dernier).

Les éléments permettant d'identifier l'auteur de l'alerte ne peuvent pas être divulgués, sauf à l'autorité judiciaire, sans le consentement de celui-ci. Les éléments permettant d'identifier la personne visée par l'alerte ne peuvent pas être divulgués, sauf à l'autorité judiciaire, sans que le caractère fondé de l'alerte ne soit établi.

Les informations recueillies dans le cadre de ce dispositif sont à destination uniquement de l'entité qui vous emploie, de TWDC et du prestataire fournissant la Guideline, Navex Global Inc., situé à Lake Oswego, Oregon, Etats-Unis, et sont collectées aux fins de gestion et de traitement des alertes professionnelles. Conformément aux dispositions de la loi n°78-17 du 6 janvier 1978 relative à

l'informatique, aux fichiers et aux libertés, telle que modifiée, et du Règlement Général sur la protection des données 2016/679, toute personne identifiée dans le dispositif dispose, le cas échéant, d'un droit d'accès, de rectification et de suppression des données personnelles la concernant. Ces droits s'exercent en contactant directement le point de contact dédié à l'entité qui vous emploie (voir le Employee Data Protection Notice de l'entité qui vous emploie).

- Pour The Walt Disney Company France : les employés sont dirigés vers [DToolsHR.disney.com](https://DToolsHR.disney.com) en libre-service ou peuvent contacter HR via l'adresse [TWDC.EMEA.GDPR.Enquiries@disney.com](mailto:TWDC.EMEA.GDPR.Enquiries@disney.com).  
Par ailleurs : [EMEA.Data.Protection.Office@disney.co.uk](mailto:EMEA.Data.Protection.Office@disney.co.uk) est disponible pour les requêtes internes. [dataprotection@disney.co.uk](mailto:dataprotection@disney.co.uk) est disponible pour les requêtes externes.
- Pour Euro Disney Associés SAS : les employés sont invités à utiliser l'adresse suivante : [dlp-donneesperso-cm@disney.com](mailto:dlp-donneesperso-cm@disney.com).

The **WALT DISNEY** Company  
And Affiliated Companies

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**FOR USE ONLY IN THE COUNTRIES LISTED BELOW IN APPENDIX A:**

If you have a question about, or become aware of, a possible violation of the Standards of Business Conduct, don't be afraid to speak up! When you have a concern or a question, you can:

- Talk to your supervisor.
- Contact your local Human Resources representative.
- Contact your local Legal department
- Contact the Guideline

The country-specific telephone numbers for the Guideline are listed in the attached Appendix A.

**What is the Guideline?**

The Guideline is a phone line that provides employees, Cast Members, vendors, suppliers, Guests and customers, and others with a way to:

- Make the Company aware of any suspected unethical or illegal conduct or standards violations.
- Ask for guidance on any business conduct related issues.
- Report questionable activity – including questionable accounting or auditing matters.
- Report complaints or concerns about accounting matters, internal accounting controls, or auditing matters.

The Guideline is available 24 hours a day, 365 days a year. The Company strictly prohibits any form of retaliation against anyone who in good faith makes a complaint or reports any suspected wrongful conduct to the Company. Reports may be made anonymously, and the confidentiality of all reports will be maintained to the extent possible.

**APPENDIX A**

<b>COUNTRY</b>	<b>GUIDELINE TELEPHONE NUMBER</b>
ARGENTINA	0800-666-1676
AUSTRALIA	1-800-20-8921 (OPTUS); 1-800-14-0796 (TELSTRA)
BRAZIL	0800-891-4137
CHILE	1230-020-2093
CHINA	10-800-711-0583 (CHINA NETCOM); 10-800-110-0561 (CHINA TELECOM SOUTH)
HONG KONG	800-90-1454
INDIA	DIAL AT&T DIRECT CODE: 000-117 AFTER HEARING A TONE, DIAL: 800-699-4870
JAPAN	00531-11-5136 (KDDI); 0066-33-830169 AND 0044-22-112725 (SOFTBANK); 0034-800-900267 (NTT)
KOREA	00798-1-1-005-8393 (KOREAN TELECOM); 00308-1-10492 (DACOM); 00368-11-0099 (ONSE)
MEXICO	001-800-620-1445
VENEZUELA	DIAL AT&T DIRECT CODE: 0 800 552 6288 AFTER HEARING A TONE, DIAL: 800-699-4870