

ACCENTURE BUSINESS ETHICS HELPLINE

DATA PRIVACY NOTICE

Your privacy is important to us when you use the Accenture Business Ethics Helpline (“**Helpline**”). This Data Privacy Notice (“**Notice**”) explains what personal data we collect from you when you use the Helpline and how we use it.

The Helpline is provided by Accenture LLP, 161 N. Clark Street, Chicago, IL 60601 (“**Accenture**”). The website and telephone lines through which you may report an incident as well as the database in which the reports are stored, are operated by Navex, 6000 Meadows Road, Suite 200, Lake Oswego, Oregon 97034, USA (“**Navex**”), Accenture’s independent service provider of the Helpline.

The Helpline is a voluntary and confidential online reporting system which allows people to report suspected violations of company policy or local laws and regulations. You are encouraged to report possible violations directly to your HR representative or the Legal Department, depending on the nature of the possible violation. If you feel that you are unable to do so, you may use the Helpline to make your report. In certain countries, Accenture may only accept reports through the Helpline that relate to financial, accounting, auditing or bribery matters. If your concern pertains to a matter that, under local law, may not be accepted by Accenture, you will need to contact your local HR representative or the Legal departments to report the matter.

What information is collected? We may collect the following information through the Helpline: your name, job function and contact details; the name and other data about individuals that are named in your report; a description of the conduct at issue in your report including time, date and location, as well as other pertinent information; and any questions you may have. We may also collect information from others during any subsequent investigation.

The information provided by you will be treated confidentially. We therefore encourage you to identify yourself.

How will the information be used? Accenture’s Corporate Investigations team responsible for the Helpline will evaluate the information you provide and may conduct an investigation. Your cooperation and assistance in that investigation may be necessary. Following an investigation, Accenture may take such action as it determines to be appropriate under the circumstances. We may process the information mentioned above because we have to either comply with a legal obligation imposed on Accenture, or we have a legitimate interest to investigate the report that you submitted to us, or you may have provided your consent.

Who will receive reports within Accenture? Depending on the nature of the matter, Corporate Investigations may communicate the report and related documentation to appropriate personnel at Accenture who may need to be informed, such as Employee Relations, Local Legal Leads, and/or the Auditing departments, for further investigation and resolution. Where necessary, Corporate Investigations may also need to notify members of Human Resources or Accenture management of any finding of violation for purposes of determining any disciplinary action, together with equivalent representatives of the relevant Accenture affiliate or subsidiary. The information may also be shared with Accenture’s external advisers (such as lawyers, auditors or accountants).

Due to applicable laws, individuals you identify may be informed about the fact that a report has been made. Where reasonably possible, Accenture will not reveal your name or identity. All individuals you identify will have the right to respond to or correct information you report.

Are there other reporting considerations I should be aware of? Please note that the information you supply may result in decisions that affect other Accenture employees or third parties involved in the relevant incident. We, therefore, ask you to provide only information that, to the best of your knowledge, is accurate and relevant to the report. You will not be subject to retaliation from Accenture for any report of a suspected br-39179 legal or compliance violation that is made in good faith, even if it later turns out to be incorrect. However, knowingly providing inaccurate or misleading information will not be tolerated and may result in disciplinary actions or even

civil or criminal liability. The information you submit will be treated confidentially and we encourage you to identify yourself in order for us to follow up with questions we may have.

Where are reports stored and are there any transfers of the data to other countries? Any personal information that you provide to us will be stored in the database of the Helpline. The database is hosted and operated on behalf of Accenture by NAVEX, an independent service provider located in the United States. NAVEX will protect the confidentiality and security of your personal information, and will only use your personal information for the provision of the Helpline. Beyond NAVEX, other transfers of personal information may take place to countries that have different data protection rules than are found in your country of residence, including to other Accenture affiliates or vendors, as required to investigate the report and administer the Helpline. Note in this regard that some of the non-EEA countries are recognized by the European Commission as providing an adequate level of protection according to EEA standards (the full list of these countries is available [here](#)). With regard to transfers to other countries, we have put in place adequate measures, and you may obtain a copy of these measures by contacting dataprivacy@accenture.com.

How long will Accenture retain my personal information? Accenture will retain the information you report in accordance with Accenture's Corporate Records and Information Management guidelines as outlined in [Accenture's Global Policy 1413](#), which may be updated from time to time to reflect local law requirements and legitimate business needs.

Any information you submit that is not needed to answer your question or for the investigation of any incident may be deleted or archived, as permitted by local law. In addition, once we have responded to your question or completed any investigation, all information you submitted will be deleted or archived as required by local law. Accenture will take appropriate technical, organizational, and legal steps to secure the information you provide.

How will Accenture protect my personal information and what are my rights? Accenture has taken appropriate steps to maintain the security of your personal information collected via the Helpline, including requiring certain security protocols with all of its service providers (See the NAVEX, Inc. Privacy Policy for additional information: <https://www.navex.com/en-us/privacy-statement/>). [Accenture's Global Data Privacy Policy 90](#) governs how Accenture protects and uses your personal information, and explains your rights to request to review, correct, update, suppress/restrict, transfer or delete personal information that you have provided to us. Subject to exemptions provided in data privacy laws, you have all the rights provided in applicable data privacy laws and [Policy 90](#). You can make inquiries about and/or exercise those rights by contacting your local Accenture Data Privacy Officer, or by email at dataprivacy@accenture.com. Questions about the Helpline also may be directed to the above address. You also have the right at all times to lodge a complaint with a supervisory authority competent for your country or region.

What happens if my report falls within the scope of the EU Whistleblowing Directive? If your report falls within the scope of the EU Whistleblowing Directive or its local implementing legislation, by choosing to report to the Helpline you are agreeing that the report is made to Accenture and can (if appropriate, given the nature and seriousness of your report) be investigated and fed back not only by your local employing entity but also by other authorized, specialist resources that may be part of other group entities (being the Corporate Investigations team) under the supervision of our most senior global Leadership. By choosing to report to the Helpline you are therefore agreeing that your identity and all relevant information of your report may be shared with the mentioned group resources on a need-to-know basis. If you do not wish to have your report handled in this way, then please refer to the EU Supplement to Policy 1000 for alternative ways to raise your concern.