



November 16, 2023

ALTICE INTERNATIONAL & ALTICE FRANCE (SFR)

As communicated previously, in mid-July of this year, Altice Portugal – a subsidiary of Altice International – learned that the Public Prosecutor’s Office in Portugal was investigating allegations of harmful practices and misconduct of certain individuals and entities affecting Altice Portugal and its subsidiaries.

Internal investigation and remedial actions

At that time, Altice International, Altice France and their affiliates took immediate remedial actions, including enhancing internal control procedures and controls, strengthening the oversight of procurement processes and suspending certain employees that had potential connections to the misconduct under investigation.

Moreover, Altice International and Altice France immediately undertook to transition away from all suppliers potentially implicated in the Portuguese authorities’ investigation. To date, Altice International and Altice France have both substantially completed these transitions according to plan and will have completed the transition plan in full by the end of 2023. As previously noted, Altice International and Altice France confirm that these potentially implicated suppliers accounted for approximately (i) less than 2% of Altice France’s total expenditures and (ii) less than 6% of Altice International’s total expenditures (mainly in Portugal).

In parallel, an internal investigation in Portugal and across other jurisdictions under the direction of a global investigation committee was launched to perform a thorough risk assessment in key jurisdictions. External legal counsels Ropes & Gray and DLA Piper France were appointed as global counsel, with the support of local external counsels in each jurisdiction. They are also being assisted by forensic experts (Ernst & Young and Accuracy) in conducting this review and root cause analysis of the alleged conduct.

The investigative work initially scoped has been substantially completed and no material impact is expected on Altice International’s or Altice France’s financial statements.

Importantly, following the Public Prosecutor Office’s public statement on July 14, 2023 identifying Altice Portugal as a victim in this case, Altice Portugal’s status as a victim has been further confirmed with its designation as an assistant to the prosecution led by the Public Prosecutor’s Office in Portugal, as publicly reported on October 26, 2023. As such, given the Portuguese authorities’ ongoing investigation, Altice International and Altice France will continue to take account of all available facts and circumstances in determining further investigative steps and making internal and external decisions necessary to protecting their rights in each geography in which they operate.

Enhanced processes, policies and procedures going forward

Although there were already robust control mechanisms in place in both companies, Altice International and Altice France have proactively initiated actions to enhance and strengthen several internal control processes, policies and procedures to effectively prevent, detect and mitigate the risk of any future potential individual misconduct and have appointed external advisors to support them in the implementation of such actions. This includes further strengthening the compliance team of each operating company under the leadership of the local general counsels. The whistleblowing procedures will be enhanced and made even more accessible to allow all employees and other



relevant parties to feel comfortable using the various speak-up channels. A particular emphasis has been put on all policies and procedures related to: (i) conflict of interest; (ii) procurement; (iii) third-party due diligence, onboarding and ongoing monitoring; (iv) conduct of real estate transactions, and (v) accounting controls, as well as more general policies such as the Code of Ethics. Specifically on the procurement process, each operating company will be responsible for its own purchase orders independent of the other operating entities, while a coordination committee including all head of procurement departments will be set up in order to allow the operating entities to continue to benefit from economies of scale.

Altice International and Altice France uphold the highest standards of ethics and compliance and do not tolerate inappropriate behavior of any kind.

Altice International and Altice France are fully committed to supporting the authorities in their review.

Altice International, Altice France and their affiliates will continue to take all necessary steps to protect their interests and rights in all jurisdictions.