



Scenarios for handling issues and alerts

I. A member of staff wonders:

1. About the anti-corruption code of conduct or the whistleblowing mechanism

They can refer their questions in confidence:

- to their direct report
- or to one of the two ethics officers (by e-mail)

Depending on the nature of the query, the direct report or ethics officer:

- provides an immediate response
- recommends referring the matter to the Ethics Committee

2. On facts and behaviours witnessed

Employee can report their questions to the Ethics Committee (by e-mail), confidentially.

II. Response further to referral to the Ethics Committee

1. The Ethics Committee acknowledges receipt of the alert.

It has three months to "process" the alert.

The Ethics Committee meets freely in accordance with the Ethics Committee Charter signed by its members.

2. The Ethics Committee checks:

- the admissibility of the alert;
- whether the alert meets the criteria for whistleblower protection, which is open to external and occasional employees (Article 6)

2.1 If it does not fall within the scope of Article 6:

It can be dealt with by any means appropriate to the situation;

2.2 If it falls within the scope of Article 6:

The entire process should be conducted with due regard to protecting the confidentiality of:

- the whistleblower's identity,
- the facts contained in the alert,
- those targeted by the alert.

The employee (whistleblower) is informed.
The person targeted by the alert can be informed.

3. The Ethics Committee studies the factual elements contained in the alert mechanism.

At this stage, the Ethics Committee has several options:

3.1 Check the nature of the alert:

In the event of deliberately slanderous denunciation, the perpetrator is liable to sanctions, including dismissal;

The Ethics Committee sends the file to the management of the entity concerned, which follows it up.

3.2 No further action:

- He/she informs the employee and destroys the data in the file
- and fills in the anonymised dashboard for the audit committee.

3.3 Ask the employee to provide additional documentation to substantiate the facts.

3.4 Identifies a need for further information, and investigation with, for example:

- the group's Financial Controller,
- administrative management,
- an outside agency,
- others

3.5 The Ethics Committee analyses the elements reported by the enquiry and decides on the severity and nature of the facts reported:

3.5.1 It informs the employee of the action taken on their alert.

3.5.2 It chooses whether or not to inform the person targeted.

3.5.3 It refers the case to the relevant departments: informing General Management, imposing sanctions on the individual involved (administrative department), reorganising posts, communicating on the case or not, etc.

3.5.4 If an executive is involved in the criminal acts or if it is a complex matter, it can refer the matter to the governance bodies: Chairman of the Board of Directors.

3.5.5 It provides anonymised reporting to the audit committee.

(Article 6): "A whistleblower is a natural person who discloses or reports, in a selfless manner and in good faith, a crime or offence, a serious and manifest breach of an international commitment duly ratified or approved by France, of a unilateral act of an international organisation taken on the basis of such a commitment, of the law or regulations, or a serious threat or harm to the general interest, of which he or she has personal knowledge. Facts, information or documents, whatever their format or medium, covered by national defence secrecy, medical secrecy or lawyer-client confidentiality are excluded from the whistleblowing regime defined in this chapter.