

Whistleblowing procedure

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From : Marjorie HELMBACHER

Verified by : Ethics & Compliance Committee

To :

All permanent or casual employee of SOCOMEC Group companies

All directors and legal representatives of SOCOMEC Group companies

All business partners of SOCOMEC Groupe

Preamble

As part of our commitment to maintaining the highest standards of compliance and ethics throughout the SOCOMEC Group, we undertook a review of our whistleblowing (or "reporting") process in 2024. Through this initiative, SOCOMEC has implemented a process better suited to the size and linguistic diversity of the Group. In order to enhance the reliability, transparency, and confidentiality of our whistleblowing process, we have decided to collaborate with an independent third-party organization (the company EQS).

This platform allows employees and other stakeholders to report unethical practices, ensuring the anonymity of whistleblowers (when they wish to and where local regulations allow), and maintaining the confidentiality of the information provided. This platform, designed to be easily accessible to all Group members, is available 24/7, in all the languages spoken by the employees and partners of the SOCOMEC Group, thus promoting active and unhindered participation by all employees in strict compliance with the requirements of the General Data Protection Regulation (GDPR).

The personal data of users is protected and processed securely, thereby strengthening the trust and integrity of our whistleblowing process.

1. Who can raise an alert about what?

Our ethics and compliance whistleblowing process allows all **employees, suppliers, partners, etc.**, of the SOCOMEC Group to report or disclose a situation or event that could impact the operations, safety, reputation, or integrity of the SOCOMEC Group, such as:

- Violations of Group policies
 - Code of Conduct (internal and/or external)
 - Human Rights Policy
 - Internal policies or employee handbooks
- Potential violations of national and international regulations
- And/or behaviors that threaten the public interest.

It is important for SOCOMEC to be aware of potentially non-compliant behaviors that pose a risk to an employee and/or the company. By reporting conduct that you suspect to be inappropriate, you allow us to take action to address it promptly and prevent potential harm. This contributes to the long-term success of our company.

2. What are the conditions for an alert to be admissible?

For an alert to be admissible, meaning that it can lead to an investigation, it is important that the whistleblower:

- Be a **natural person** (and not a legal entity)
- Must not derive **any direct financial benefit** from the report
- Act in **good faith** (i.e., they have reasonable grounds to believe that the reported facts are true based on the information available to them).

The following cannot be considered a good faith report:

- Using the process to report facts with the intent to intentionally harm the SOCOMEC Group or one or more of its employees;
- Using the process with at least partial knowledge of the inaccuracy of the reported facts.

Such abusive uses of the whistleblowing process or false accusations may result in disciplinary action as well as legal proceedings.

If the information was obtained **not acquired through work**, the whistleblower must have **personally been aware of it**.

The alert can be submitted anonymously to enhance the confidentiality of the whistleblower, and in any case, sensitive information related to the incident will be treated confidentially.

In accordance with applicable laws and regulations, the whistleblower is legally protected, and no punitive measures will be taken against them as a result of their report.

3. What are the different channels for submitting a report?

Employees, as well as third parties and stakeholders with whom SOCOMEC interacts, may have concerns or questions about certain practices and may need assistance or advice.

Employees can reach out to their direct or indirect supervisor or a member of the Ethics & Compliance Committee.

Third parties and other stakeholders can contact the Ethics & Compliance Committee.

First and foremost, to benefit from the legal protective status granted by law, the whistleblower is encouraged to submit their report through one of the following channels:

- The online platform "EQS Integrity Line" → <https://socomecgroup.integrityline.com>
The online reporting form is available in 16 languages.
- An automated messaging service with a toll-free number available for the following countries:

Country	Phone Number
Canada	+1 289 401 91 98
China	+86 10 8003 200 116
United-States	+1 213 279 1015
France	+33 1 87 21 22 91
India	+91 117 181 6583
Italy	+39 02 81480081
Tunisia	+216 31 36 59 23

Company Access Pin (CAP) : **9714**

Reports made via the platform or by phone are conducted within a secure and protected communication framework.

When reporting by phone, the caller's anonymity is also preserved through **voice modification**. The call is handled with the utmost confidentiality, and the caller's phone number is not disclosed to SOCOMEC.

The whistleblowing procedure is free of charge for the person submitting the report.

4. Procedure for Whistleblowing:

a) Recipient of the Report :

Any report received via the EQS Integrity Line platform or the automated telephone messaging service will be reviewed (listened to) and handled by one or more of the following individuals:

- The Group Human Resources Director
- The Group Chief Financial Officer.

These individuals are designated as "Group Ethics & Compliance Referents."

The Group Ethics & Compliance Referent, if applicable, informs the whistleblower of the receipt of the report within no more than seven (7) days.

The whistleblower will be informed about the admissibility of their report, and the investigation will be conducted within a reasonable timeframe not exceeding thirty (30) days. They will receive an initial response outlining the actions being considered or already taken to address the reported issue.

If the investigation cannot be completed within this timeframe due to its nature or complexity, SOCOMEC will notify the whistleblower of the reasons for the delay and the measures taken up to that point.

Depending on the circumstances and if necessary, the Group Ethics & Compliance Referent may, for the purposes of the investigation, disclose all or part of the information in their possession to:

- The Group Legal Director, when the report pertains to **business ethics and compliance**.
- A Local Ethics & Compliance Referent when the report concerns **workplace relations and other misconduct**, and if the country from which the alert originates has more than 250 employees.

b) Investigation process:

The investigation is conducted in compliance with applicable local laws and regulations and is carried out fairly.

Initially, investigations are managed internally by the recipient of the report. The recipient reviews the information collected and may request additional information from the whistleblower. Any information communicated can only be shared with individuals who have a legitimate need to know to ensure proper handling of the alert.

In more complex cases, investigations may be conducted jointly by the recipient of the report and other members of the Ethics & Compliance Committee, possibly excluding one of its members during the investigation to ensure impartiality. The recipient may also seek external support, such as a lawyer or auditor, with the approval of the Ethics & Compliance Committee, provided that this support is subject to the same confidentiality rules and is necessary for the verification or handling of the report.

Any person accused in the context of an alert will be informed of the nature of the allegations against them. However, this information may not be immediate if it is necessary, for example, to verify facts or preserve evidence.

c) Process Duration

SOCOMECE prioritizes the handling of reports and strives to complete the process as swiftly as possible. The processing time may vary depending on the complexity of the case.

d) Handling of Personal Data

The whistleblowing process complies with the regulatory framework established by the GDPR (General Data Protection Regulation) and is included in the SOCOMEC Group's processing register.

Only personal data, or data that can be linked to individuals and that is necessary for handling the whistleblowing procedure, will be processed and recorded.

After closure of the procedure and upon the expiry of the retention periods, the personal data records will be either anonymized or deleted.

5. Confidentiality of the Report

Provided that the whistleblower follows the established reporting procedure, they benefit from legal protective provisions.

The SOCOMEC whistleblowing process ensures strict confidentiality:

- **The identity of the Whistleblower:** The identity of the whistleblower cannot be disclosed to anyone without their consent, except in cases where information is transmitted to judicial authorities.
- **The identity of the person(s) targeted by the report.**
- **The information collected** by the recipients of the report.

For individuals, revealing identifying details about the persons and information mentioned to anyone outside the investigation process may, depending on local regulations, result in imprisonment and fines. Therefore, the recipient of the internal alert and all individuals who have access to the report are bound by this strict confidentiality obligation. This obligation also extends to the whistleblower; failure to comply may result in losing legal protections and committing a breach of confidentiality.

6. Legal Protection and Protection Against Retaliation

The whistleblower will receive legal protection in the form of exemption from criminal and civil liability, as long as they acted in good faith and in accordance with legal procedures. SOCOMEC ensures protection for the whistleblower against discrimination and retaliation that might result from their report. This means that SOCOMEC will not tolerate any form of discrimination, intimidation, or other harmful measures against the whistleblower.

Furthermore, in the case of a whistleblower who is an employee of the SOCOMEC Group, they cannot be dismissed, sanctioned, or subjected to any disciplinary measure in any way for having reported facts in accordance with the whistleblowing procedure. They are therefore protected from being sidelined, sanctioned, reassigned, transferred, dismissed, or subjected to any other discriminatory measures by their employer, particularly regarding remuneration, training, etc.

It is important to note that the whistleblower, like any employee, remains subject to sanctions for behaviors or actions unrelated to the content of the report.

7. Guarantee of Handling and Destruction of Identifying Information in Case of Non-Follow-Up

The whistleblower is assured that their report will be considered and handled, with information being transmitted to the appropriate individuals for action (internally within the company or to judicial or administrative authorities).

Any person obstructing the transmission of a report to these individuals and authorities may face imprisonment and/or fines according to local legislation.

In cases where no further action is taken, identifying information related to the whistleblower and the individuals targeted by the report will be destroyed. Information that does not identify individuals will be archived confidentially by the SOCOMEC Group with restricted access for a period not exceeding the duration of potential legal proceedings. Destruction of this information will occur no later than 2 months after the completion of all admissibility checks or the investigation.

In cases where the investigation leads to legal proceedings, the case files are duly preserved for the necessary period. The whistleblower and the individuals targeted by the report will be informed of the case's closure.

8. Summary Diagram of the Reporting Process:

