

BLOW THE WHISTLE

INTERNAL NOTIFICATION PROCEDURE

We must all respect the provisions set out in our Ethics Charter, and especially those pertaining to the **obligation to protect the integrity and offer respect to the values and ethical principles upheld** by the company. We must not only, first and foremost, respect the Charter, but we must also be its guardians.

Therefore, the company expects that all of us commits to:

- Take action when facing a situation that goes against the Charter.
- Notify the events that may have been witnessed.
However, one cannot be penalised for not having implemented this notification procedure.

Even though it is possible to raise an alert by contacting a line manager or the Human Resources department, the Beaumanoir Group has implemented an **internal alert** system that makes it possible to contact the "**Ethics Committee**":

- By email to the following address: compliance@groupe-beaumanoir.com
- By post to: Groupe BEAUMANOIR (**Direction Ethique**) – 10 impasse du Grand Jardin – ZAC La Moinerie – 35418 SAINT- MALO, FRANCE.

This system is also available for all those who need help or advice regarding the content of the Ethics Charter and the modalities for its implementation, and for those who did not get answers from their superior or from Human Resources.

After receiving a notification, the Ethics Committee will be in charge of addressing the signal as soon as possible (maximum period of **48 hours** to take charge of it and one month to process it), with respect to **confidentiality, impartiality and**

presumption of innocence.

The Ethics Committee is made up of:

- Group General Manager
- Group Delegate General Manager
- Group Delegate General Manager of support and service
- Group Director of Human Resources, Communication, CSR and Chief Compliance Officer
- Group Sourcing Director
- Group Financial and Administrative Director
- Group Legal Director
- Group Sustainable Sourcing Manager

Once the Ethics Committee has received the notification, they will address it:

- By making sure that the events that are the object of notification fall under the umbrella of the Beaumanoir Group's **Ethics Charter**
- By entrusting investigations to the department in the Group that is best qualified for identifying and addressing the notified facts.

Next is the **investigation** phase, during which applicable laws, regulations and norms will be respected.

People referred to in the alert will be notified that charges have been brought against them. However, it may not be instantaneous if the investigation team needs to analyse the veracity of some elements, protect evidence, or notify the relevant authorities.

Besides, during the investigation, each interrogated person must be honest, cooperative and communicate all information and documents she/he has when requested.

4. Blow the whistle

In order to guarantee the confidentiality of the investigation, confidential data (whistleblower's identity, facts reported, accused person(s), and any other information coming from the investigation) will only be communicated to the legitimate, empowered and authorised persons to process the alerts during the investigation, so that they can ensure its follow-up and make informed decisions when the investigation ends.

Once the investigation is done, the team in charge of the investigations will give a report to the Ethics Committee, which will then rule over the decisions to make to end to problem, sanction the events and prevent any risks.

Whenever possible, if it complies with laws and confidentiality, the results of the investigations will be communicated to the whistleblower.

It should also be known that no individual who comes forward in "**good faith**" and does not benefit from any direct financial gain will be sanctioned or retaliated for having notified the committee of any event related to true or potential

corruption, influence peddling, unfairness, conflict of interest or discrimination, with respect to this notification procedure.

Someone of good faith is someone who, when using this procedure, provided complete and honest information, even if after the investigation it turns out to be erroneous.

Anyone who believes being retaliated against after raising an alert (dismissal, harassment, demotion, intimidation, reputational damage, or any other sanction / discrimination) must immediately notify the committee following this procedure, because he/she can benefit from a **legal protection** if the procedure is complied with (French law n°2016-1691).

Plus, any physical or legal person who helps the whistleblower to raise an alert also benefits from a legal protection against retaliation.

However, any **dishonest or slanderous notification** with a purpose that goes against neutrality, fairness and respect may be **sanctioned**.

OTHER NOTIFICATION CHANNELS

Even though making an internal notification is encouraged in the first place, other whistleblowing channels can be used to report a fact (French law n°2016-1691)

First, it is also possible to make an **external notification** to justice, competent national authorities, or the French "Défenseur des droits".

Besides, the "Défenseur des droits" can guide whistleblowers to the appropriate body to receive their report and can support them in their procedure.

Last, a **public disclosure** is possible only in some situations:

- If after raising an alert externally (preceded by an internal alert or not) there is no processing after a certain period.
- If making an external notification exposes the whistleblower to retaliation or there is no chance the alert is processed (for instance, risk of conflict of interests)
- If there is an imminent and clear danger for the general interest

These conditions are necessary if the whistleblower wants to benefit from a legal protection as per French Law.