

# BLOW THE WHISTLE

# INTERNAL NOTIFICATION PROCEDURE

We must all respect these provisions 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”**:

- Par By email to the following address: [compliance@groupe-beumanoir.com](mailto:compliance@groupe-beumanoir.com)
- By post to: Groupe BEUMANOIR (**Direction Ethique**) – 10 impasse du Grand Jardin – ZAC La Moinerie – 35418 SAINT- MALO, France.

The purpose of this whistleblowing system is to provide a secure resource that can be anonymous, to report confidentially and in good faith any situations that are contrary to the principles of the Ethics Charter.

It is open not only to Group employees but also to former employees, prospective employees, external and occasional employees, contractors and subcontractors.

This system is also available for all those who need help or advice regarding the content of the Charter and the modalities for its implementation, and for those who

did not get answers from their superior or from Human Resources.

## **Scope of the whistleblowing system**

Reports made under the whistleblowing system bring to the attention of the Ethics Committee information concerning:

- facts relating to the existence of conduct or situations contrary to the Ethics Charter, in particular any fraud or attempted fraud or corruption, any breach of ethics or conflict of interest
  - a crime or an offence\*
  - a threat or harm to the public interest\*
  - more broadly, any alleged violation or attempt to conceal a violation of an international commitment, a unilateral act of an international organisation taken on the basis of such a commitment, of European Union law, of the law or regulations\*

*\*In relation to the Beaumanoir Group's area of responsibility*

These may be facts that have occurred or are likely to occur.

Where the information was not obtained in the course of their professional activities, the whistleblower must have had personal knowledge of it.

The information provided must be factual and directly related to the subject of the alert.

Facts, information or documents, whatever their form or medium, covered by secrecy laws or regulations (national defence, judicial secrecy, medical secrecy, lawyer-client relations) are not admissible.

Reports must be made in good faith and without direct financial consideration. The facts and information transmitted must be

serious and not misleading.

Misuse of the system as a delaying tactic or for defamatory purposes exposes the perpetrator to disciplinary sanctions and legal proceedings.

### **Principle of confidentiality**

People who wish to make a report are advised to identify themselves, as their identity will be treated confidentially. However, the report may be anonymous (for example, by using an email address that does not allow the author of the report to be identified).

The Group's whistleblowing procedure guarantees the strict confidentiality of the facts reported, as well as the personal data of the whistleblower, the person(s) implicated or concerned by the report and any third party mentioned in the report.

This confidentiality applies without prejudice to the possibility for the Beaumanoir Group to implement disciplinary and/or contentious procedures relating to the facts reported, as soon as the investigations carried out as part of the processing of the report allow the facts to be established.

### **Processing of reports**

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 Director
- Labour Lawyer

It is recalled that the Ethics Committee is subject to a strict obligation of confidentiality.

Once the report has been received, the Ethics Committee will **examine its admissibility.** To this end, the author of the report may be asked to provide additional information.

If the report is declared inadmissible, the file is closed as inadmissible and the information collected is immediately destroyed/archived.

If the report is admissible, an internal investigation will be carried out to verify the validity of the facts.

During this **investigation phase**, the Ethics Committee orders and carries out all necessary investigations to examine the merits of the Report. Where appropriate, it may entrust the investigations to the Group department best placed to identify, characterise and deal with the facts reported.

The persons concerned by the report will be informed that accusations have been made against them and will be given the opportunity to be heard. 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.

In order to guarantee the confidentiality of the investigation, confidential data (identity of the whistleblower, alleged facts, persons concerned and any other

information resulting from the investigation) will only be communicated to legitimate persons who are authorised and empowered to process whistleblower reports as part of the investigation, so that they can follow up on them and take informed decisions following their conclusion (transmission to the judicial or administrative authorities, disciplinary sanctions, filing without further action).

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.

The author of the report will be informed of the outcome of the processing of the report within a reasonable period following the end of the investigation and the implementation of any resulting disciplinary or other measures.

### Protection of the whistleblower

It should be noted that no person acting in "**good faith**" and receiving no direct financial compensation will or may be otherwise be sanctioned or suffer reprisals for having made a report in accordance with the whistleblowing 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 of 9 December 2016 as amended by Law 2022-401 of 21 March 2022 aimed at improving the protection of whistleblowers).

This protection also applies to:

- facilitators, defined as any natural person or any legal entity under private law with a non-profit purpose who helps a whistleblower to make a Report or disclosure in compliance with the law;
- individuals connected to the whistleblower who are at risk of reprisals in the course of their professional activities by their employer, their client or the recipient of their services;
- legal entities controlled by a whistleblower, for which he or she works or with which he or she has a professional relationship

### Personal data

The whistleblowing system complies with regulations on the protection of personal data.

Personal data collected as part of the system is processed only by duly authorised persons specifically responsible for managing the system.

In addition, the Group undertakes to collect and use only personal data that is appropriate, relevant and limited to what is necessary for the purposes for which it is processed in the context of the report.

Reports are only kept for the time strictly necessary and proportionate to their processing and the protection of their authors, the persons they concern and the third parties they mention, taking into account the time required for any further investigations. However, data relating to reports may be kept beyond this period, provided that the individuals concerned are neither identified nor identifiable.

## 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 of 9 December 2016 as amended by Law 2022-401 of 21 March 2022 aimed at improving the protection of whistleblowers).

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. A practical guide for whistleblowers can be consulted on the Défenseur des droits website to inform those who wish to make a report about their rights and obligations in this area.

Whistleblowers may also choose the **hierarchical route** by reporting their concerns to their direct or indirect superior. The latter's role will then be to advise and guide the whistleblower towards the procedure best suited to their situation.

Last, a **public disclosure** (by any means: press, blog, social networks, etc.) is possible only in some situations:

- Either after having made an external report (preceded or not by an internal report) and that no "appropriate" action has been taken within 6 months of the acknowledgement of receipt of the report or, failing acknowledgement of receipt, 6 months from a period of 7 working days following the report,
- Or if an external report exposes the whistleblower to reprisals or is certain to be ineffective, in particular if evidence can be concealed or destroyed or if the person reporting has serious grounds to believe that the authority may be in a conflict of interest, in collusion with the perpetrator or implicated in the facts,
- Or in the event of imminent or evident danger to the public interest, in particular where there is an emergency situation or a risk of irreversible harm.

When it is likely to harm the interests of national defence and security, public disclosure is only possible in the first case (lack of appropriate response from the external authority).

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