

ACTIA provides its employees and all of the Group's stakeholders with an alert system.

This system meets the Group's obligations under anticorruption laws. It is also open to report other unethical facts.



ETHICS & ANTICORRUPTION WHISTLEBLOWING SYSTEM



SCOPE

THE ACTIA WHISTLEBLOWING SYSTEM IS OPEN TO ALL SERIOUS UNETHICAL FACTS.

According to the law, this covers:

- A felony or misdemeanor,
- A serious and manifest violation of a law or regulation,
- A serious and manifest violation of an international treaty in force,
- A serious threat or serious harm to the general interest.

The whistleblowing system covers the following areas:

- Corruption and influence peddling,
- Competition rules,
- Accounting, financial, banking,
- Social: discrimination, harassment,
- Health, hygiene and safety at work,
- And in general the areas for which ACTIA has an obligation to open a whistleblowing system.



DEFINITION OF THE WHISTLEBLOWER



Any person who, in good faith, that is to say, believing that their statement is complete and accurate, reports a potential violation of the anticorruption code of conduct, or other serious unethical facts.

Whistleblowers are protected from all forms of reprisal.



PARTIES CONCERNED

The whistleblowing system is open to:

- All Group employees,
- External and temporary employees,
- Commercial partners,
- Subcontractors,
- Suppliers,
- Customers.

This openness is in the interest of the ACTIA, as it allows the widest possible reporting of information.



ETHICS COMMITTEE

The Ethics Committee, whose members are appointed by the Board of Directors of ACTIA Group, has the main mission of handling alerts seriously, promptly and impartially.

It investigates the facts and recommends appropriate action to General Management.

It is bound by confidentiality.

The committee meets every time it receives a whistleblowing report and at least once a year to analyze all the reported facts and the follow-up given.

Whistleblowing report may be made through the following email address: [contact.integrity \[at\] actia.fr](mailto:contact.integrity@actia.fr)



NATURE OF THE REPORTED FACTS

The whistleblowing system applies to anyone who, within ACTIA:

- Find themselves faced with a risk of corruption,
- Believe in good faith that a violation of the Anticorruption code of conduct has been or is being or may be committed,
- Are faced with other unethical facts,
- Or discover that someone is experiencing reprisals after having submitted a report in good faith.

Whenever possible, precise and dated facts must be provided, with indication of the context and of any other witnesses.



REPORTING PROCEDURE

TWO POSSIBILITIES:

- **ACTIA's employees:** A whistleblowing report may be submitted internally (your line manager / HR Director / CFO / Chief Legal Officer / General Manager). The General Management of ACTIA companies ensures that managers provide you with all the help you need to apply the ACTIA Group's Code of Conduct.
- **ACTIA employees and external partners:** you can also send your report to the Ethics Committee at: [contact.integrity \[at\] actia.fr](mailto:contact.integrity@actia.fr). The Ethics Committee will acknowledge receipt of your report. Likewise, as soon as the file is closed, the Ethics Committee will confirm that the alert has been processed.

Whistleblowers must, in principle, identify themselves. This allows them to benefit from all the legal protections related to the status of whistleblower. Their identity will be treated confidentially.

Anonymous reports are however also accepted.

Finally, if ACTIA does not react within a reasonable time, the law provides that justice or the administration can also be seized, and if no action is taken within three months, the alert can then be made public.



PROTECTION AGAINST REPRISALS

The law protects whistleblowers when:

- They are natural persons,
- Who denounce serious facts with specific elements,
- And the alert is made in good faith.

Under these conditions, the whistleblower cannot be sanctioned, dismissed or discriminated against for having raised an alert.

An erroneous alert made in good faith will not result in disciplinary action. On the contrary, deliberately slanderous denunciations are punishable.

Besides, obstructing whistleblowing is a criminal offense.



CONFIDENTIALITY

The procedures implemented to collect alerts guarantee that all recipients of the report observe a strict confidentiality of the identity of the authors of the report, of the persons targeted and of the information collected.

Elements which could lead to identify the whistleblower may not be disclosed, except to the courts, without the person's consent.

Elements which could lead to identify a person implicated in an alert cannot be disclosed, except to the courts, until the well-founded nature of the alert has been established.



PROTECTION OF PERSONAL DATA

ACTIA implements data collection and processing in order to operate the whistleblowing system. Employees have been informed prior to the implementation of the system.

In accordance with the data protection regulations in most of the countries in which the Group operates and, in particular within the European Union, any persons identified in connection with a whistleblowing report, whether as the author or the subject of such a report, may contact the Ethics Committee to exercise their right to access the data concerning them by sending a request accompanied by a copy of their personal identity document to the following e-mail address: [contact.integrity \[at\] actia.fr](mailto:contact.integrity[at]actia.fr)

They may also ask for correction or deletion if the data is inaccurate, incomplete, equivocal or outdated in the same manner, by e-mail to the following e-mail address:

[contact.integrity \[at\] actia.fr](mailto:contact.integrity[at]actia.fr)

This professional whistleblowing system is subject to:

- Formalities with the French authority in charge of the protection of personal data, the CNIL (French Data Protection Authority),
- A consultation with the Works Council or other equivalent body of each Group Company where it is applicable,
- In France, prior individual notification to the employees under Article L. 1222-4 of the French labor Code and in application of the French Data Protection law.



CONTACT

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