

SOCOTEC

WHISTLEBLOWER HANDBOOK

How to file a whistleblower complaint in the SOCOTEC Group



WHISTLEBLOWER HANDBOOK

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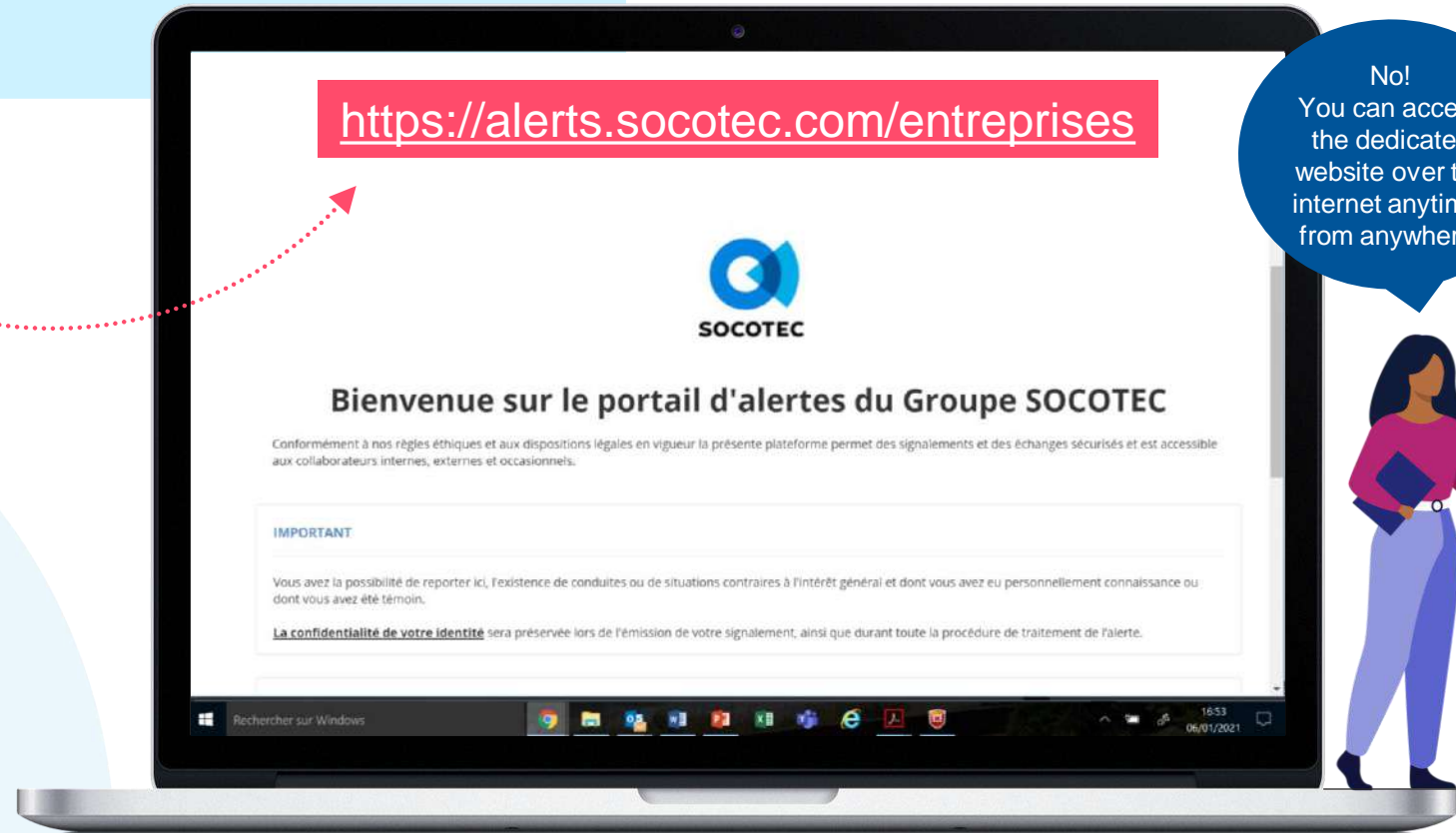
A person is shown from the side, wearing a blue button-down shirt over a white tank top, typing on a silver laptop. The laptop is on a wooden desk. The background is a bright, out-of-focus office space with a window. The text '1. How do I file a whistleblower complaint?' is overlaid in white on the left side of the image.

1. How do I file a whistleblower complaint?

DEDICATED WEBSITE

The SOCOTEC Group has a **dedicated website** available in **eight languages** through which you can file a complaint, no matter where you are.

You can access it
**through the
website**



<https://alerts.socotec.com/entreprises>



Bienvenue sur le portail d'alertes du Groupe SOCOTEC

Conformément à nos règles éthiques et aux dispositions légales en vigueur la présente plateforme permet des signalements et des échanges sécurisés et est accessible aux collaborateurs internes, externes et occasionnels.

IMPORTANT

Vous avez la possibilité de reporter ici, l'existence de conduites ou de situations contraires à l'intérêt général et dont vous avez eu personnellement connaissance ou dont vous avez été témoin.

La confidentialité de votre identité sera préservée lors de l'émission de votre signalement, ainsi que durant toute la procédure de traitement de l'alerte.

No!
You can access the dedicated website over the internet anytime, from anywhere!

Do I need to be at the office using the intranet to file a whistleblower complaint?

BEING A WHISTLEBLOWER

- Anyone may file a whistleblower complaint, **whether or not they are a Group employee.**
- After you send your complaint, you will receive a **number** you can use to track your complaint through the website.
- You may wish to **remain anonymous**, but since that might make it more complicated for the Ethics Committee to conduct its investigation, make sure to submit all the supporting documents.
- Whistleblowers are **protected** and will not be fired for filing a complaint (unless the complaint is proven to be false).

- As a whistleblower, you will be covered by the protection policies as long as you **meet the following criteria:**
 - you are a natural person,
 - the complaint is impartial and in good faith,
 - you are reporting acts of which you have personal knowledge
 - the complaint pertains to acts that are in contravention of the provisions of the Code of Ethics.

INITIALISER IDENTIFIER DECLIERE TRANSMETTRE

Nom*

Prénom*

Profession*

Email*

Téléphone

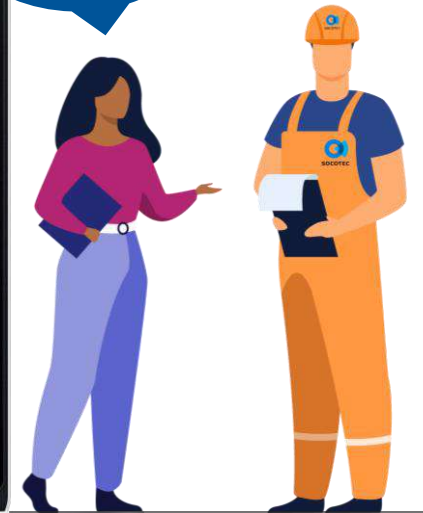
Je souhaite rester anonyme pour faire ce Signalement

Important !
Il est recommandé que le signalement soit anonyme, sachant que vos données sont traitées de façon confidentielle.
À titre exceptionnel, vous pouvez effectuer un signalement de manière anonyme si la grille des faits renseignés est double et que les éléments factuels transmis sont suffisamment détaillés.
Vous devez indiquer que si les faits renseignés ne sont pas suffisamment détaillés, ils ne seront l'objet d'aucun traitement en service annuellement. Vous devez également indiquer, dans le cas, le signalement sera traité comme plus long et moins efficace que l'inspection interne vous et la personne en charge du traitement sera plus complexe.
Lorsque vous cochez cette case, l'adresse électronique et le numéro de téléphone sont automatiquement masqués et les notifications des Producteurs de votre signalement.

Retour Suivant

Whistleblowers can be anonymous.

Got it!



DOCUMENTS TO SUBMIT



The complaint is **confidential**

- All complaints must be **valid** and based on **proven facts** that were personally experienced or ascertained by the whistleblower.
- Whenever possible, you **must provide evidence of the alleged facts**. You may do this by any means: written evidence, images, testimonials, etc.
- You may attach **supporting documents** to the complaint or send them later.

You must keep the acts you are reporting confidential, and the Ethics Committee guarantees the confidentiality of the whistleblower's identity, the identity of the person(s) involved and the acts that are the subject of the complaint. This requirement also applies to anyone questioned as part of the investigation, as well as the HR department, which may be asked to participate or implement the Ethics Committee's recommendations.

The complaint is also kept confidential from outside parties. It may be shared with the courts of competent jurisdiction only in rare serious cases.

Is my complaint admissible if I don't have any supporting documents?

Yes, as long as you're not making a false accusation or submitting a complaint with intent to cause harm, an ad hoc investigation will be launched.





2.

When
should I file a
whistleblower complaint?

SITUATIONS THAT CALL FOR A WHISTLEBLOWER COMPLAINT



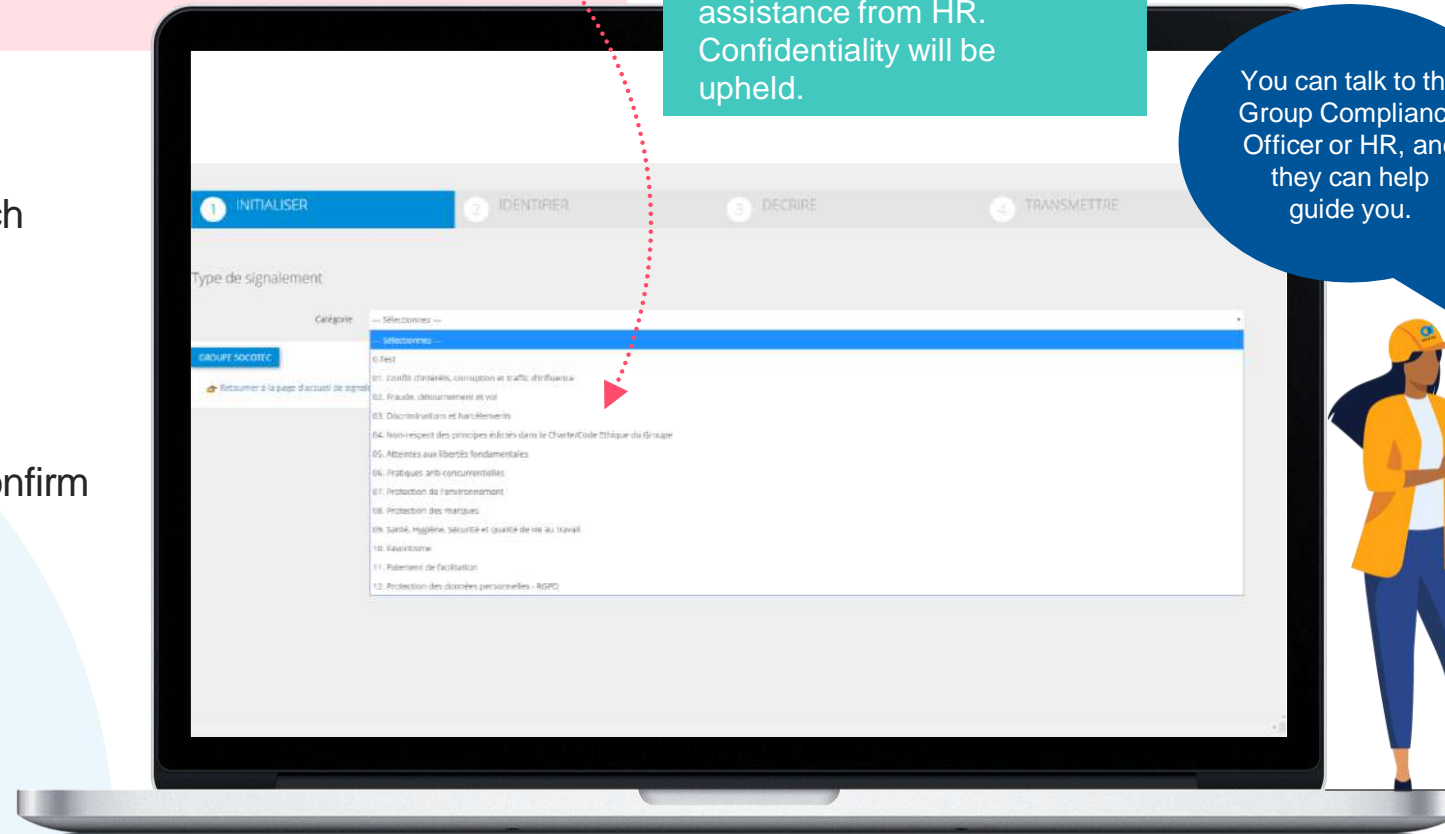
The website <https://alerts.socotec.com/entreprises> lists **different situations** in which a whistleblower complaint may be filed.

If you have any questions about a situation, you may ask the Group Compliance Officer for an opinion or get assistance from HR. Confidentiality will be upheld.

You can talk to the Group Compliance Officer or HR, and they can help guide you.

What if I'm not sure about a situation?

- Generally speaking, the cases being reported must be in breach of the provisions of the Group's Code of Ethics.
- When you select a situation, an example appears so you can confirm that it matches the events you experienced or witnessed.

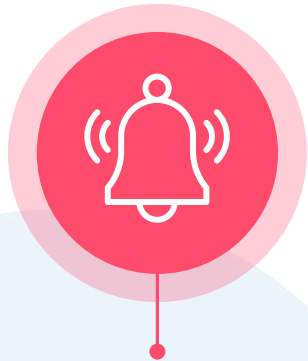


TIME FRAME AND PROCEDURES FOR PROCESSING A WHISTLEBLOWER COMPLAINT

Barring any unusual complications, deterioration in the overall situation or an occurrence of force majeure, it takes **two months** to process a complaint.

The Ethics Committee meets during that time to assess **the admissibility** of the complaint and to decide **how to proceed**.

You can track the progress of the complaint **in real time** through **the dedicated website**.



The members of the Ethics Committee **consider the complaint within five business days**.



An investigation is launched to interview the whistleblower and the person(s) involved, and to **verify the alleged facts**. If necessary, the Group Compliance Officer travels to conduct the investigation.



The Ethics Committee may contact any helpful person during the investigation – some people are even sought out as experts!

I've been contacted in connection with a complaint. Should I be concerned?



A group of four people, three men and one woman, are shown in profile, looking intently at a large computer monitor. The monitor displays lines of code, likely in a programming language like Python or JavaScript. The scene is dimly lit, with the primary light source being the screen, creating a focused and professional atmosphere. The people are dressed in casual business attire. The background is blurred, showing other office lights and equipment.

3.

Who
responds to the
complaint?

GROUP NETWORK



The members of the **Ethics Committee** are:

Bastien Soret

General Counsel, SOCOTEC Group

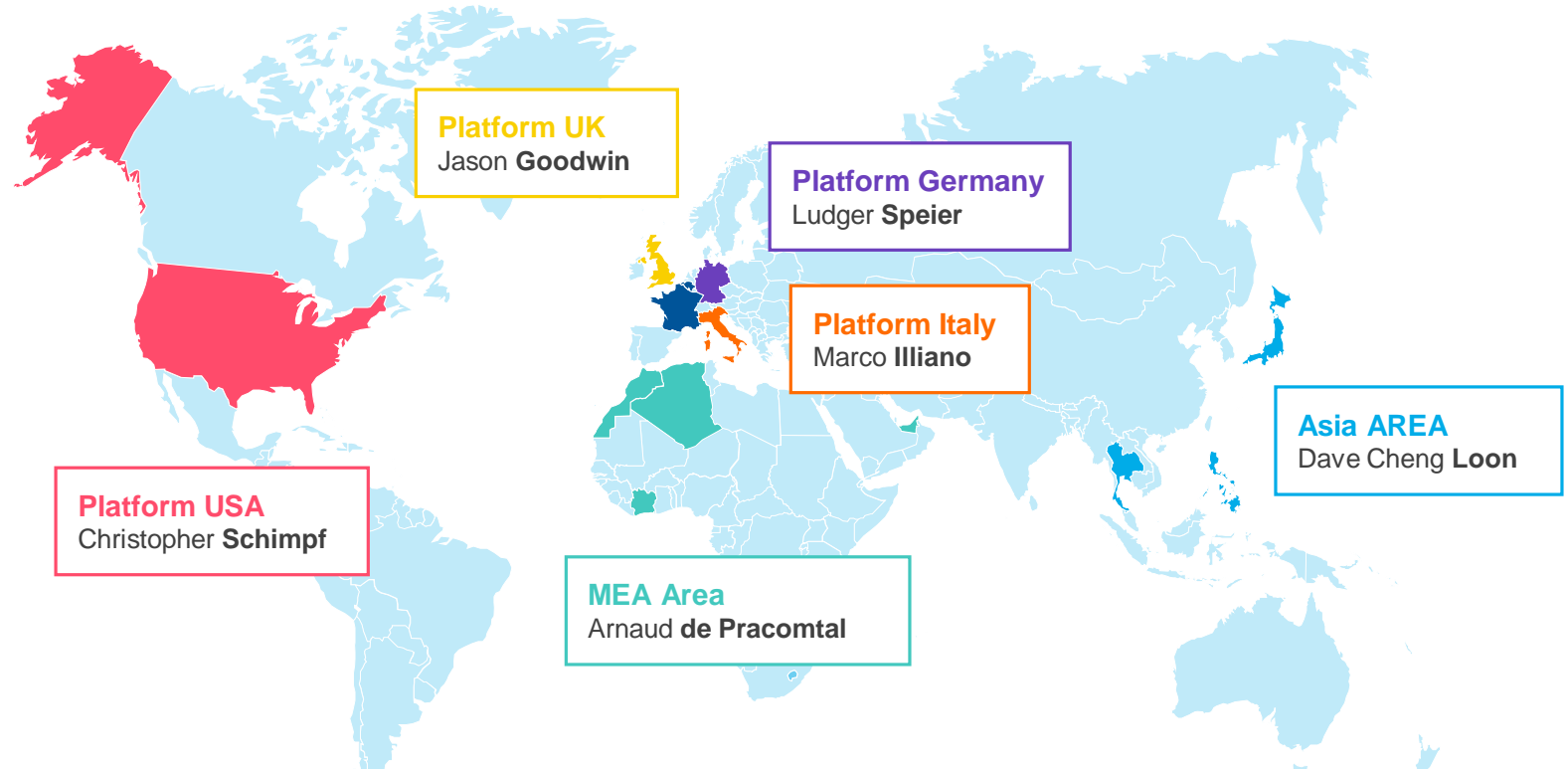
Sébastien Botin

HR Director, SOCOTEC Group

Clémence Cattelain

Compliance Officer, SOCOTEC Group

The Group has created a network of **local Compliance Officers**.



In some cases, during the course of the investigation, the Ethics Committee may call on the Local Compliance Officers to provide support or share their on-the-ground expertise.

You may also contact them if you have any questions about a situation.



SOCOTEC

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