

As part of the French Anti-corruption Law and the Anti-corruption code of conduct adopted by the Group, the decision has been made to provide all Group stakeholders with an anti-corruption whistleblowing internal system, described in this document, which everyone is required to comply with.

Anti-corruption Whistleblowing Internal System



Definitions

ACT OF CORRUPTION

Corruption is any behaviour whereby a person proposes, requests or accepts, directly or through an intermediary, any donation, offer or promise, gift or benefit in return for performing, delaying or failing to perform an act which directly or indirectly falls within his/her duties in order to obtain or maintain a commercial or financial advantage or to influence a decision (see Anti-corruption Code of Conduct).

WHISTLEBLOWER

Any employee who, in good faith, that is to say, firmly believing that his/her statement is full and accurate, reports a potential violation of the anti-corruption code of conduct, will be 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 Group because it ensures the widest possible reporting of information.

Ethics committee

It is composed of:

- Two members from the Management Board;
- One member from the Legal Affairs Department;
- One member from the Quality Department;
- One member from the International Department;
- One member from the Human Resources Department;

His/her role is to analyse all whistleblowing reports submitted in the Group, as and when they are made.

After examining the gravity of the reported facts and the accuracy of the information provided, the Ethics Committee determines the appropriateness of processing each whistleblowing report and implements, if required,

the necessary measures to investigate the reported facts.

Any whistleblowing report may be referred to it at the following email address: contact.integrity@actia.fr

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



Nature of the reported fact

Employees may express their concerns and/or address their questions to their management (your line manager / HR Director / CFO / Chief Legal Officer) and/or to the Ethics Committee:

- If they find themselves faced with a risk of corruption within the Group;
- If they believe in good faith that a violation of the Anti-Corruption code of conduct has been or is being or may be committed within the Group;
- If they discover that someone is experiencing reprisals after having submitted a report in good faith within the Group.

Authors of whistleblowing reports must, as a matter of principle, identify themselves. Their identity will be treated confidentially and their anonymity will be respected. After examining the gravity of the reported facts and the accuracy of the information provided, the Ethics Committee will determine the appropriateness of processing this whistleblowing report; it reserves the right to not investigate allegations made in bad faith and/or allegations devoid of sufficiently precise information.

Whenever possible, you must provide precise, dated facts, and indicate the context, and any other witnesses to the reported incident.

Stage-by-stage reporting procedure

In the case of an individual action, the author of the report must meet the criteria set out in the definition of whistleblowers (see above) and follow the stage-by-stage reporting procedure below to enjoy immunity from criminal liability:

OR

- A whistleblowing report may first be submitted internally (your line manager / HR Director / CFO / Chief Legal Officer);
- If no follow-up is made within a reasonable time, or immediately if the context requires it, you must submit your report to the Ethics Committee at the following address: contact.integrity@actia.fr

The Ethics Committee will send you an Acknowledgement of receipt as soon as your report is taken into account.

Similarly, as soon as the file is closed, the Ethics Committee will confirm that the report has been processed successfully.

Your line manager / Human Resources Director / Chief Financial Officer / Chief Legal Officer are the right contacts for you to express your concerns and/or ask questions and you may contact them at any time.

The General Management of the ACTIA Group companies ensures that the managers you contact will give you all the help and advice you need to comply with the ACTIA Group's Code of Conduct.



Protection against reprisals

Whistleblowers may not be subject to reprisals; no person may be excluded from a recruitment procedure or an internship or a training program; no employee may be sanctioned, dismissed or be subject to a direct or indirect discriminatory measure, in particular as regards compensation, training, relocation, assignment, qualification, outplacement, professional promotion, transfer or contract renewal, as well as measures of profit-sharing and allocation of shares, for submitting a whistleblowing report.

In the event of termination of the employment contract following a whistleblowing report, the author of the report may appeal to the Labour Court.

In addition, an error in good faith will not result in any disciplinary action. ON the other hand, a person who deliberately makes false accusations is subject to penalties.

Applicable penalties

in the event of violation of this Anti-corruption code of conduct

Any accused employee is presumed to have acted in accordance with the Group's Anti-corruption code of conduct until the evidence gathered during the investigation reasonably demonstrates that the Anti-corruption code of conduct has not been complied with.

Non-compliance with the rules entails the personal liability of the employee and exposes him/her to criminal penalties, according to the applicable legislation.

The ACTIA Group fully commits to:

- Take all allegations seriously;
- Investigate allegations effectively and on time;
- Assess the facts objectively and impartially;
- Take appropriate corrective and disciplinary measures (up to and including termination of employment) when an allegation claim is substantiated.



Confidentiality

In order to protect the author of the whistleblowing report against possible reprisals, the ACTIA Group guarantees the strict confidentiality of his/her identity. Confidentiality is not limited to the identity of the author of the whistleblowing report, but also covers the persons implicated and the information collected by all the recipients of the whistleblowing report.

Protection of personal data

The whistleblowing system is implemented by the ACTIA Group in its capacity as controller. The 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@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@actia.fr

This professional whistleblowing system has been subject to:

- Formalities with the French authority in charge of the protection of personal data, the CNIL (French Data Protection Authority) by the single authorisation no. AU-004,
- A consultation with the Works Council, or any other equivalent body, of each Group Company,
- Prior individual notification to the employees under Article L. 1222-4 of the French Labour Code and in application of the French Data Protection law.



Addresses & Useful links

Access to the e-mail address: contact.integrity@actia.fr

Sample questions and answers based on real-life cases can help you make your decision.

Queries may be submitted to the global address: contact.integrity@actia.fr

Group anti-corruption code of conduct: The Group Anti-corruption code of conduct is available on the website www.actia.com under "Group / Commitments".

INTERNAL WHISTLEBLOWING SYSTEM

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