

Whistleblower protection policy



Summary

I. What is a whistleblower ?

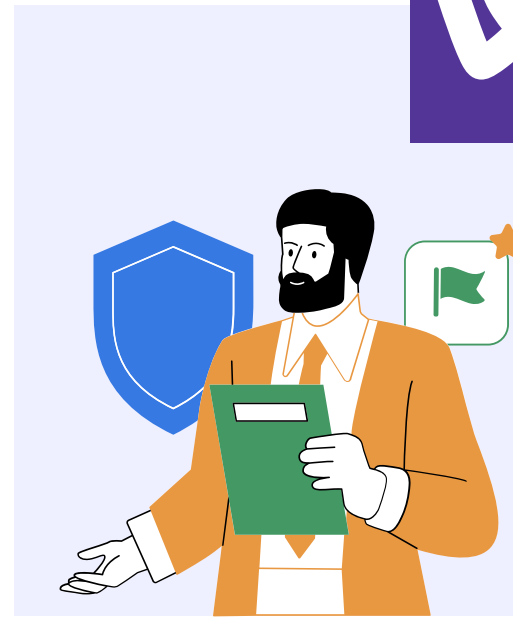
II. Who can be a whistleblower ?

III. What facts can be alerted ?

IV. What is the scope of protection ?

V. What is the procedure?

VI. Applicable laws



I. What is a whistleblower ?



A whistleblower is a natural person who reports or discloses, without direct financial compensation and in good faith, information concerning a crime, an offence, a threat or a prejudice to the general interest.

It may also concern a violation (or an attempt to conceal such a violation) of an international commitment by France.



II. Who can be a whistleblower ??



In a company, the status of whistleblower may concern an employee but also former employees, job applicants, managers, shareholders or partners, co-contractors or subcontractors of the company.



III. What facts can be alerted ?

The information must relate to facts that have occurred or for which there is a strong probability that they will occur. This could include, for example, acts of moral or sexual harassment or corruption.





IV. What is the scope of protection ?

The protection concerns the whistleblower, but also any natural person (colleagues, relatives) or legal entity (e.g. trade union) who assists the whistleblower in making the report or disclosure.

Confidentiality

Whistleblowers are protected by the confidentiality of their alert. In this sense, the procedure is entirely anonymous.

Civil irresponsibility

Whistleblowers enjoy civil immunity from civil liability for damages caused by their reporting or disclosure.



Criminal irresponsibility

Whistleblowers enjoy enhanced immunity in the event of the removal, misappropriation or concealment of documents, or any medium containing the information that is the subject of the whistleblowing.

Protection against reprisals

Whistleblowers are protected from any "baïllon" measures such as disciplinary sanctions (dismissal, lay-off), threats or intimidation, discrimination.

V. What is the procedure?

1. Internal reporting procedure

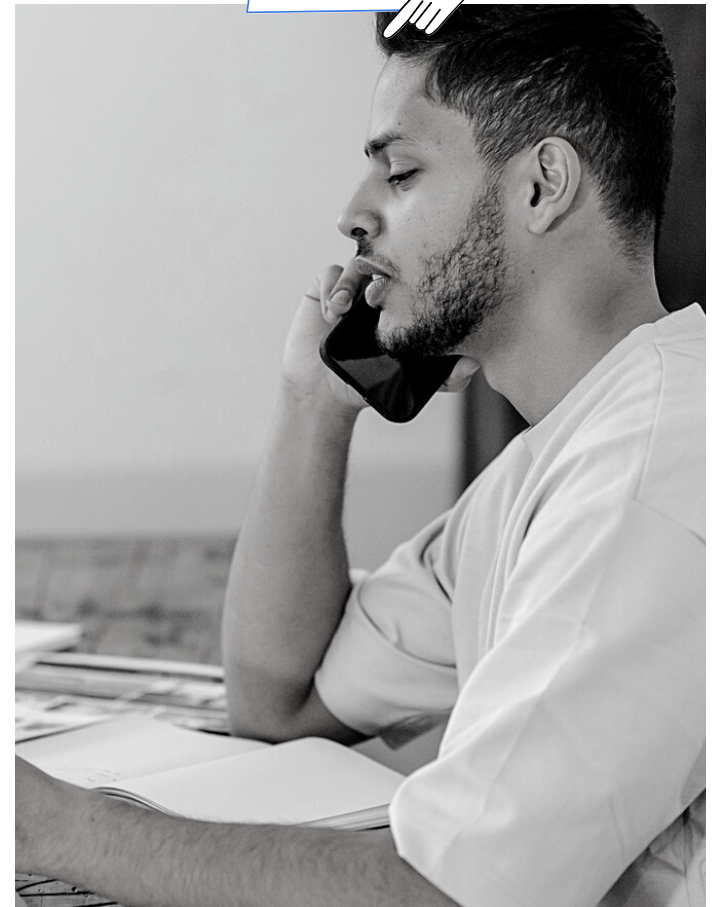
When an employee has information that proves unethical and illegal behaviour, there are several ways to report it internally, either through their manager or directly to one of the members of the Ethics Committee.

It is also possible to send an email to the address below and ask to remain anonymous:

lanceur.alerte@anywr-group.com

The author of the alert shall be informed in writing of its receipt within 7 working days.

He/she shall also be informed in writing and within a reasonable time of the measures envisaged or taken within a maximum of 2 months and 7 working days.





2. External reporting procedure

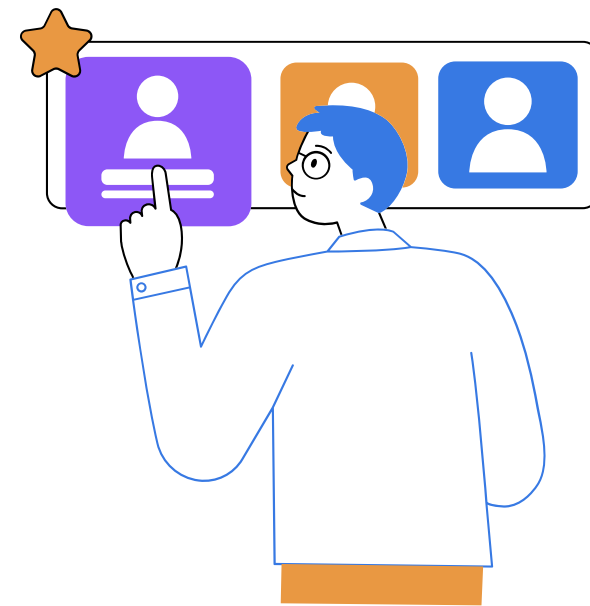
After resorting to internal whistleblowing or failing to do so, the whistleblower may notify one of the following authorities :

- DGCCRF : the Directorate-General for Competition, Consumer Affairs and Fraud Control
- HAS : the High Authority for Health
- Cnil : the national commission for information technology and liberties
- DGT: the Directorate-General for Labour
- DGEFP: the General Delegation for Employment and Vocational Training
- The "défenseur des droits"
- The judicial authority
- The European Union (EU) institution, body or agency responsible for a breach of EU law.

3. Public disclosure

Public disclosure is permitted in certain situations.

- If **no appropriate action has been taken by the alerted authority and after a certain period of time**: *contact the legal department for more information*;
- In case of **serious and imminent danger** ;
- In case of **imminent or obvious danger to the public interest** ;
- If **external reporting puts the whistleblower at risk of retaliation**;
- If **external reporting has no chance of success**.





La loi Sapin II

"LOI n° 2016-1691 du 9 décembre 2016 relative à la transparence, à la lutte contre la corruption et à la modernisation de la vie économique."

La loi Wasserman

"LOI n° 2022-401 du 21 mars 2022 visant à améliorer la protection des lanceurs d'alerte."

VI. Applicable laws

