

Deployment of the internal alert system

Séché Environnement (the "Group") has opted to set up a single technical system for collecting alerts for general and anti-corruption alerts in compliance with the legal provisions for the protection of whistleblowers and the recommendations of the French Anti-Corruption Agency (AFA).

In order to support you in the application of the ethical principles defended by the Group, this alert system represents a channel that complements the direct exchange with your line manager.

Summary

1. Who can issue an alert?
2. What facts can be reported?
3. Whistleblower status
4. Under what guarantees should an alert be issued?
5. How should the alert be addressed?
6. How to issue an alert in three steps
7. How is the alert handled?
8. Retention of personal data

1. Who can issue an alert?

The Group's alert system is open to members of staff and to external and/or occasional employees: employees on permanent or fixed-term contracts, trainees, apprentices or work-study students, employees of a temporary employment agency working within or on behalf of a Group company, employees on secondment...

2. What facts can be reported?

Behavior contrary to the anti-corruption code of conduct to which the Group refers, as well as facts falling within the definition of a whistleblower (Article 6 of the law of December 9, 2016):

- a crime or misdemeanor;
- a serious and manifest violation of an international commitment ratified or approved by France;
- the violation of a unilateral act of an international organization taken on the basis of such a commitment;
- a serious and manifest violation of a law or regulation;
- threat or serious prejudice to the general interest.

The whistleblowing system thus enables Group employees to report serious facts in the following areas:

- Corruption, competition;
- Accounting, finance;
- Discrimination, harassment ;
- Health, hygiene and safety at work;
- Environmental protection.

The list is not exhaustive.

3. Whistleblower status

In order to benefit from the legal protection associated with whistleblower status, five conditions must be met:

- To be a natural person;
- To have personal knowledge of the facts;
- Act in a disinterested manner;
- Act in good faith;
- Reveal serious facts.

When these criteria are met, the whistleblower benefits, in application of the law, from guarantees:

- Immunity from prosecution under the conditions of article L. 122-9 of the Penal Code;
- Disclosure of information "is necessary and proportionate to safeguard the interests involved" and is made in accordance with the procedures for reporting alerts;
- Moreover, the person concerned may not be dismissed, sanctioned or discriminated against as a result of the alert.

In France, the law provides:

- A one year prison sentence and a fine of 15 000 € for any person obstructing in "any way whatsoever" the transmission of an internal report to the company or to the judicial or administrative authority or to a professional order;
- A whistleblower can also be prosecuted in the event of a false alert. The law provides for a civil fine of up to 30,000 euros.

The status will not be granted if the alert :

- Is outside the scope of the system;
- Is in bad faith;
- Is not serious in nature;
- Does not contain elements that are sufficiently precise and cannot be verified.

In the event of a deliberately slanderous denunciation, its author is liable to sanctions that may go as far as dismissal.

4. Under what guarantees should an alert be issued?

All data collected in the context of this alert system will be treated confidentially, be it :

- The identity of the person issuing the alert;
- The facts which are the subject of the alert;
- Or of the persons covered by the alert.

All useful precautions will be taken to preserve the security of these data.

- The persons in charge of collecting alerts or processing them are for this purpose subject to a reinforced obligation of confidentiality.
- The personal data collected in the context of this alert system are processed in accordance with the obligations of the General Data Protection Regulations (GDPR).

5. How should the alert be addressed?

You have doubts or questions about a particular situation:

Do not hesitate to inform and/or ask your line manager or the Group Chief Compliance Officer: these persons are your privileged interlocutors and are in a position to help and advise you on the attitude to adopt in order to comply with the Group's code of conduct or the present system.

If you are unable or do not wish to contact your hierarchical superior, you can use the ethics alert system available on seche.ethicspoint.com or contact the toll-free number (please see seche.ethicspoint.com) available 24 hours a day, 7 days a week. The alerts transmitted must be characterised by the good faith and disinterestedness of their author. This is optional.

The information to be communicated is as follows:

- Your surname, first name, position and place of work;
- The facts that you wish to communicate, in an objective and sufficiently precise manner, to allow verification of the alleged facts;
- You may also choose to remain anonymous.

6. How to issue an alert in three steps

The alert may be sent to the hierarchical superior or via this mechanism ;

If the alert has not been dealt with within a reasonable period of time, it may be addressed to the judicial or administrative authority or to the professional bodies ;

If not processed within three months by one of the above bodies, the alert may be made public.

7. How is the alert handled?

You will receive within a short and reasonable time, an acknowledgement of receipt of your report, to the email address you have used or the one you have indicated as being the chosen exchange address.

You will then be informed of the foreseeable time within which the Group will be able to examine the admissibility of the alert.

The Group Chief Compliance Officer and, where appropriate, his representatives will carry out the necessary investigations in order to find the elements necessary to prove or not the alleged facts within a reasonable period of time. They are subject to obligations of confidentiality, independence, impartiality and transparency.

If the report issued establishes that there has been a violation of the Anti-Corruption Code of Conduct or of the law, the conclusions will be forwarded to General Management and the Human Resources Department, which will take the appropriate corrective measures and/or sanctions.

8. Retention of personal data

Alerts which, falling within the scope of the system, do not result in any disciplinary or legal proceedings, will be closed without further action and all data collected will be destroyed or archived under the conditions and within the time limits provided for by the texts in force.

If disciplinary or legal proceedings are initiated following an alert, the data will be kept until the end of the proceedings and archived for a period of time in accordance with the deadlines provided for by the texts in force.

In summary :

- If you wish to obtain information, information or advice, you can contact :
 - your line manager;
 - your local compliance officer, if any;
 - the Group Chief Compliance Officer.
- You cannot or do not wish to contact your direct supervisor:
 - You can use the alert system available on seche.ethicspoint.com.

Annex

References

The Group's anti-corruption code of conduct, which is aimed at French companies with more than 500 employees and consolidated sales of more than 100 million euros, provides for an internal alert system³ that allows for the collection of reports of conduct or situations that are contrary to this code and that could constitute corruption.

However, in addition to the mechanism provided for in Article 17, 2° of II, the Sapin II Law introduces in III of Article 8 (Chapter II devoted to the protection of whistleblowers) an obligation for any company with at least 50 employees to set up "appropriate procedures for collecting alerts issued by members of their staff or by external and occasional collaborators".