

PROFESSIONAL WHISTLEBLOWING SYSTEM

REPORT

When confronted with a problem of ethics, any collaborator should inform his/her direct or indirect superior or business unit manager where he/she carries out his/her activity so that the latter may be able to advise them or take the appropriate decision by consulting Trigano's general management if need be.

INTERNAL REPORT

Trigano also provides all collaborators with a professional whistleblowing system to selflessly and in good faith report facts that they have personally been made aware of concerning a crime or misdemeanor, a grave menace or prejudice to the public interest, an infringement or an attempt to conceal an infringement of any international commitment ratified or approved by France, European Union law, or laws or regulations, of which the whistleblower would have been aware in the course of their professional activities, or any information relating to such facts of which the whistleblower would have been personally aware outside their professional activities, especially concerning:

- corruption and influence peddling (in particular all behaviors or situations contrary to the rules presented in its code of conduct in the fight against corruption or its ethical charter)
- accounting irregularities
- irregularities in stock market matters (insider trading)
- irregularities in public procurement,
- irregularities in the prevention of money laundering and terrorist financing,
- irregularities in product safety and conformity,
- irregularities in transport safety,
- irregularities in consumer protection,
- irregularities in the protection of privacy and personal data,
- irregularities in network and information system security,
- risk of harassment (sexual, psychological or cyber)
- risks related to serious infringements against human rights and fundamental rights, health and safety of the people, animal health and welfare, as well as the environment resulting from the company's activities or those of its subcontractors or suppliers.

This professional whistleblowing system is open:

- to any Trigano collaborator or subsidiary and is reserved to them for the reporting of existing behaviors and situations contrary to the anti-corruption code of conduct,
- to any ex-collaborator of Trigano and its subsidiaries, when the information reported was obtained during that relationship;

- to all people who have intended to stand for an employment with Trigano and its subsidiaries, when the information reported was obtained during that candidature,
- to any shareholder of Trigano and its subsidiaries,
- to any member of the administrative, executive or supervisory boards of Trigano and its subsidiaries,
- to any outside and occasional collaborator (temporary staff, interns, subcontractor's personnel or provider),
- to any co-contractor or subcontractor of Trigano and its subsidiaries, as well as to any member of the administrative, executive or supervisory boards of these co-contractors or subcontractors.

The whistleblowing system shall be used with respect to applicable laws and regulations. The report may be anonymous. An employee's failure to resort to the whistleblowing system is not a breach. No sanction may be taken against a collaborator who has reported selflessly and in good faith a breach against Trigano's values which are stated in the code of conduct in the fight against corruption, the ethical charter, company bylaws or their equivalent. A proper use of the system, even though the facts later prove to be inexact, shall not lead to a discriminatory sanction or measure of any kind against the whistleblower, the facilitators who helped the whistleblower to report, individuals connected to the whistleblower, or legal entities controlled by the whistleblower or with which he works or has a professional relationship.

However, the abusive use of this system shall expose them to disciplinary sanctions and legal action where appropriate: criminal sanctions as provided for at article 226-10 of the French penal code in case of false allegations and article R 625-8 of the French penal code for defamation.

EXTERNAL REPORT

Any whistleblower may also submit an external report, either after having made an internal report or directly:

- to one of the competent authorities listed in the appendix to Decree No. 2022-1284 of 3 October 2022, reproduced in the appendix to this whistleblowing system;
- to the Defender of Rights, who will refer them to the authority or authorities best placed to handle their report;
- to the judicial authority;
- any institution, authority or organisation of the European Union competent to collect information on infringements in the field of public procurement, services, products and financial markets, the prevention of money laundering and terrorist financing, product safety and conformity, transport safety, environmental protection, radioprotection and nuclear safety, the safety of food intended for human and animal consumption, public health, consumer protection, privacy and personal data protection, network and information system security, fraud affecting the financial interests of the European Union, free movement of goods, persons, services and capital, competition and State aid, and applicable corporate tax legislation.

WHISTLEBLOWING REPORT'S RECIPIENT

The data and information relating to the report may be transmitted to the Ethics Controllers either by post in an envelope marked "CONFIDENTIAL" or via the secure channel listed below:

Mrs. Sandrine VERMONT

Secure channel: [WhistleB, Whistleblowing Centre](#)

Address: 100 rue Petit 75019 Paris

Phone: +33(0)1 44 52 16 32

Mrs. Mélanie ALAJMO-GRANGEAUD

Secure channel: [WhistleB, Whistleblowing Centre](#)

Address: 100 rue Petit 75019 Paris

Phone: +33(0)1 44 52 16 54

RIGHTS OF THE PEOPLE NAMED IN A REPORT

Any person targeted by an alert is informed of the data concerning them in any form by the Ethics Controllers as soon as the report is filed. He/she may access this data and request their rectification or deletion should they be inexact, ambiguous or obsolete.

Where appropriate, the person targeted by the report may only be informed once necessary provisional steps have been taken to prevent the destruction of the proofs pertaining to the report.

The following information is given to any person named in a whistleblowing report:

- a copy of the rules governing the whistleblowing report procedures and legal provisions regarding the report system detailed in the Guide to Whistleblowing Reports Collection and Processing,
- the facts that are being held against them,
- the list of the report's recipients,
- the conditions for implementing his rights to access and rectification.

The person targeted by a whistleblowing report may not access the identity of the whistleblower whose strict confidentiality must be guaranteed.

APPENDIX: LIST OF FRENCH AUTHORITIES COMPETENT FOR EXTERNAL REPORTING

1. Public procurement:

- French Anti-Corruption Agency (AFA), for breaches of integrity;
- General Directorate for Competition, Consumer Affairs and Fraud Control (DGCCRF), for anti-competitive practices;
- Competition Authority, for anti-competitive practices;

2. Financial services, products and markets, and prevention of money laundering and terrorist financing:

- Financial Markets Authority (AMF), for investment service providers and market infrastructures;
- Prudential Control and Resolution Authority (ACPR), for credit institutions and insurance organisations;

3. Product safety and compliance:

- General Directorate for Competition, Consumer Affairs and Fraud Control (DGCCRF);
- Central Service for Arms and Explosives (SCAE);

4. Transport safety:

- Directorate General for Civil Aviation (DGAC), for aviation safety;
- Bureau of Investigation and Analysis for Land Transport Accidents (BEA-TT), for land transport safety (road and rail);
- Directorate-General for Maritime Affairs, Fisheries and Aquaculture (DGAMPA), for maritime transport safety;

5. Environmental protection:

- General Inspectorate for the Environment and Sustainable Development (IGEDD);

6. Radiation protection and nuclear safety:

- Nuclear Safety Authority (ASN);

7. Food safety:

- General Council for Food, Agriculture and Rural Areas (CGAAER);
- National Agency for Food, Environmental and Occupational Health Safety (ANSES);

8. Public health:

- National Agency for Food, Environmental and Occupational Health Safety (ANSES);
- National Public Health Agency (Santé publique France, SpF);
- High Authority for Health (HAS);
- Biomedicine Agency;
- French Blood Establishment (EFS);

- Compensation Committee for Victims of Nuclear Tests (CIVEN);
- General Inspectorate of Social Affairs (IGAS);
- National Institute of Health and Medical Research (INSERM);
- National Council of the Medical Association, for the practice of medicine;
- National Council of the Association of Physiotherapists, for the practice of physiotherapy;
- National Council of the Order of Midwives, for the practice of midwifery;
- National Council of the Order of Pharmacists, for the practice of pharmacy;
- National Council of the Order of Nurses, for the practice of nursing;
- National Council of the Order of Dental Surgeons, for the practice of the profession of dental surgeon;
- National Council of the Order of Chiropodists and Podiatrists, for the practice of the profession of chiropodist and podiatrist;
- National Council of the Order of Veterinarians, for the practice of the profession of veterinarian;

9. Consumer protection:

- Directorate-General for Competition, Consumer Affairs and Fraud Control (DGCCRF);

10. Protection of privacy and personal data, network and information system security:

- National Commission for Information Technology and Civil Liberties (CNIL);
- National Information Systems Security Agency (ANSSI);

11. Violations affecting the financial interests of the European Union:

- French Anti-Corruption Agency (AFA), for breaches of integrity;
- Directorate-General of Public Finances (DGFIP), for value added tax fraud;
- Directorate-General of Customs and Indirect Taxation (DGDDI), for customs duty, anti-dumping duty and similar fraud;

12. Infringements relating to the internal market:

- Directorate-General for Competition, Consumer Affairs and Fraud Control (DGCCRF), for anti-competitive practices;
- Competition Authority, for anti-competitive practices and state aid;
- Directorate-General of Public Finances (DGFIP), for corporate tax fraud;

13. Activities conducted by the Ministry of Defence:

- General Inspectorate of the Armed Forces (CGA);
- College of Inspector Generals of the Armed Forces;

14. Public statistics:

- Public Statistics Authority (ASP);

15. Agriculture:

- General Council for Food, Agriculture and Rural Areas (CGAAER);

16. National education and higher education:

- Mediator for National Education and Higher Education;

17. Individual and collective labour relations, working conditions:

- Directorate-General for Labour (DGT);

18. Employment and professional training:

- General Delegation for Employment and Professional Training (DGEFP);

19. Culture:

- National Council of the Order of Architects, for the practice of the profession of architect;
- Council of Auction Houses, for public auctions;

20. Rights and freedoms in relations with State administrations, local authorities, public institutions and bodies entrusted with a public service mission:

- Human Rights Defender;

21. Higher interests and rights of the child:

- Human Rights Defender;

22. Discrimination:

- Human Rights Defender;

23. Ethics of persons engaged in security activities:

- Human Rights Defender.