



**TYPHOON**

# ETHICAL CHARTER

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A group's subsidiary



ALLIANCE  
MARINE

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# TABLE OF CONTENTS

<b>FOREWORD</b>	<b>3</b>
<b>1. OUR ETHICAL PRINCIPLES IN THE CONDUCT OF BUSINESS</b>	<b>4</b>
<b>2. RESPECT FOR EMPLOYEES AND HUMAN RIGHTS</b>	<b>5</b>
2.1 GENERAL PRINCIPLES	5
2.2 DIVERSITY AND EQUAL OPPORTUNITIES	5
2.3 PROHIBITION OF UNDECLARED OR FORCED LABOUR	6
2.4 RESPECT IN THE WORKPLACE	6
2.5 HEALTH AND SAFETY IN THE WORKPLACE	7
2.6 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING	7
2.7 CONFIDENTIALITY OF PERSONAL DATA	7
<b>3. RESPECT FOR THE LAW AND FAIR PRACTICE</b>	<b>8</b>
3.1 GENERAL PRINCIPLES	8
3.2 CONFLICTS OF INTEREST	8
3.3 CORRUPTION	8
3.4 LOYALTY IN RELATIONS WITH COMPETITORS	8
3.5 INSIDER TRADING	9
3.6 GIFTS AND VARIOUS SOLICITATIONS	9
<b>4. RESPECT FOR THE ENVIRONMENT AND BIODIVERSITY</b>	<b>10</b>
<b>5. OUR SUPPLY CHAIN</b>	<b>11</b>
5.1 VIGILANCE IN THE RESPECT OF OUR PRINCIPLES BY SUPPLIERS	11
<b>6. COMMUNICATION AND MONITORING OF THE APPLICATION OF THE CODE OF BUSINESS CONDUCT</b>	<b>12</b>
6.1 COMMUNICATION OF THE CODE	12
6.2 WHISTLEBLOWING MANAGEMENT	12
<b>APPENDIX</b>	<b>13</b>
FOUNDING TEXTS	13
A. THE TEN PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT	13
B. THE 8 FUNDAMENTAL CONVENTIONS OF THE ILO	13
SUPPLIER CHARTER	14
THE LEGEND OF THE HUMMINGBIRD	14
PROCEDURE FOR WHISTLEBLOWING COLLECTION	16

# FOREWORD

Respect, Professionalism, and Transparency are at the heart of the ALLIANCE MARINE Group's daily action. We attach particular importance to bringing these values to life in our relations with our employees, suppliers, customers, partners, and shareholders. We bring them to all the stakeholders of our activities in all the countries where we are established.

Our Code of Business Conduct aims to reaffirm these fundamental principles that should govern each of us's behavior in our professional environment, both individually and collectively.

By formalising the Group's commitments in this way, we want to guarantee the Company's long-term growth and develop its employees' sense of pride and belonging.

In all Group's entities, it is up to each of us to defend these principles in which we believe. They will enable us to maintain, in the long term, the relationship of trust on which the ALLIANCE MARINE Group relies in its daily life with its employees, suppliers, customers, partners, and shareholders.

I am therefore counting on each of you to bring them to life in the performance of your duties.

*Jean-Paul ROCHE, CEO*

A handwritten signature in white ink, appearing to be 'JP Roche', is positioned below the name of the CEO. The signature is fluid and cursive, with a prominent initial 'J' and 'P'.

# 1

## OUR ETHICAL PRINCIPLES IN THE CONDUCT OF BUSINESS

The Group strives to behave responsibly and with integrity.

Having an ethical approach to business in all circumstances is a guarantee of sustainability. Our success and sustainable development in our markets depend on our customers, colleagues, shareholders, and business and social partners' trust.

This trust is built over time and must be earned every day. Ethics in professional life take on various aspects, sometimes seemingly contradictory, but it can be ordered around a few shared, simple and strong principles.

The principles shared by our employees are:

### Respect:

- Respect for customers and the commitments we make
- Respect for our employees, collaborators, colleagues in their diversity
- Respect for suppliers and the commitments we make
- Compliance with the law
- Respect for the environment

### Professionalism:

- Professionalism to learn every day, be demanding with oneself, and serve customers (internal and external) with seriousness and attention
- Professionalism to listen to your needs and strengthen your skills to improve the image and quality of the Company continuously
- Professionalism to work in a team for the satisfaction of each individual
- Professionalism to know that the requirement is not opposed to benevolence (and vice versa)

### Transparency:

- Transparency so that everyone understands the meaning of our decisions and actions
- Transparency so that quality information circulates within the teams
- Transparency so that internal and external negotiations are built on a sound basis
- *Transparency does not exclude the confidentiality of commercial, marketing, and strategic information. In case of doubt, the employee must listen attentively to his or her superior to determine the right level of confidentiality.*

**This charter serves as an ethical guide and applies to all the Group's activities.**

# 2

## RESPECT FOR EMPLOYEES AND HUMAN RIGHTS



### 2.1 GENERAL PRINCIPLE

Our employees are our most valuable asset. We are committed to providing inclusive, healthy, and safe working environments where all employees are respected and valued.

A day without a smile is a lost day. We attach the utmost importance to our employees' well-being and the general good humour of our teams. We make sure that each of our employees can speak freely and calmly to all levels of the hierarchy that make up our Group.

### 2.2 DIVERSITY AND EQUAL OPPORTUNITIES

No discrimination shall be tolerated on the grounds of sex, age, religion, birth, social origin, sexual orientation, family status, disability, ethnic origin, nationality, membership of workers' organisations including trade unions, political membership or opinion, or any other condition which could give rise to discrimination.



## 2.3 THE PROHIBITION OF UNDECLARED OR FORCED LABOUR

Concealed work is the failure to declare a person working in the Company officially. Forced labour is defined as work that is performed under duress or threat. Not declaring an employee is tantamount to depriving them of their rights and depriving the community of the social security contributions associated with their work.

Attentive to its employees' rights and intending to contribute to the economic and social life of the countries where it is present, our Group is committed to not resorting to undeclared work. Forcing a person to work undermines their freedom and dignity. If the Group became aware that one of its suppliers and service providers was using employees working under duress or threat, it would immediately refuse or cease all relations with that supplier or service provider. The same will apply if the Group learns that one of its suppliers and service providers does not respect children's rights or makes them work.

## 2.4 RESPECT IN THE WORKPLACE

The Group is committed to treating its employees fairly, ethically, respectfully, and with dignity. The Group ensures compliance with regulations applicable to working hours, rest periods, and local pay and the allocation of a minimum wage that meets basic needs.

The Group is committed to protecting its employees from harassment, intimidation, and victimisation, including all forms of sexual, physical, and psychological abuse.



## 2.5 HEALTH AND SAFETY IN THE WORKPLACE

The Group is committed to complying with the laws, regulations, and standards applicable to health and safety in its sectors and countries of activity.

The Group is committed to providing a safe and healthy working environment and taking the necessary precautions to prevent accidents and injuries that may affect its employees' health. Explicit health and safety regulations and procedures must be established and followed, particularly concerning the provision and use of personal protective equipment.

## 2.6 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The Group is committed to respecting the principles of freedom of association, protecting the right to organise and collective bargaining of ILO Convention C87, in compliance with local legislation.

## 2.7 THE CONFIDENTIALITY OF PERSONAL DATA

The Group undertakes to comply with the European Parliament's law on 27 April 2016, applicable since 28 May 2018, the General Data Protection Regulation (GDPR), and other regulations relating to data confidentiality. The Group, therefore, ensures that data relating to its employees, customers, suppliers, and all other stakeholders is handled appropriately and protected from disclosure.



# 3

## RESPECT FOR THE LAW AND FAIR PRACTICE

### 3.1 GENERAL PRINCIPLES

We comply with all applicable laws and regulations wherever we operate and do not tolerate non-compliance.

### 3.2 CONFLICTS OF INTEREST

A conflict of interest arises from a situation in which personal and corporate interests compete with each other.

A conflict of interest exists when an employee or one of their relatives or allies is likely to benefit personally from a transaction carried out on behalf of a Group company, particularly with its customers or suppliers. The same applies if an employee attempts to retain or have retained, in particular as a supplier, a company in which he or a close relative or ally has, directly or indirectly, material or moral interest.

Employees are invited to avoid any situation that would suggest that they might put their interests, or those of their loved ones, ahead of the Company's interests. If such a situation should arise despite themselves, they are invited to immediately and, without reservation, inform their superiors.

### 3.3 CORRUPTION

Bribery is the act of permitting, proposing or offering, soliciting or receiving, directly or indirectly, any undue advantage, monetary or otherwise, to or from a third party so that the third party, in breach of its obligations, act or refrain from acting to obtain or retain business or any other undue advantage in the conduct of business.

Our Group does not tolerate this type of behaviour within the Group or its relations with third parties.

### 3.4 LOYALTY IN RELATIONS WITH COMPETITORS

We believe in free, open, and fair competition, a factor of economic and social progress, which affects both prices and the offer's quality and the extent to the consumer and end customer. Anti-competitive practices aim to reduce or eliminate the principle of fair competition between companies in the same sector. We intend to comply strictly with applicable competition regulations in the European Union and in each market where the Group operates.



## 3.5 INSIDER TRADING

Trading in the securities of a company while in possession of confidential information or documents about that Company is a violation of Company Policy and the law. Employees who have material, confidential information are not permitted to disclose such information to other persons, including friends and family members. We keep this information strictly secret until it is publicly released so that the public can react.

## 3.6 VARIOUS GIFTS AND SOLICITATIONS

Our companies strive to maintain professional relationships with their suppliers, franchisees, contractors, and other business partners. These relationships contribute to success and must be based on sound professional judgment, mutual trust, and fair treatment. Nevertheless, gifts or entertainment offered to Employees by an actual or potential supplier may impair the objectivity of judgments when dealing with the person or Company making such gifts. Transparency and business purpose should be the guiding principles when accepting gifts of value from a supplier.

- We do not accept gifts or entertainment from a supplier, wholesaler, or any other person or Company doing or wishing to do business with the Company in exchange for favours or circumstances that may give rise to suspicion of improper behaviour or influence.
- We do not ask our suppliers for compensation in the form of gifts or entertainment.
- We do not accept or distribute cash or other in-kind equivalents such as vouchers.

If employees accept a gift or favour, they must report it and the gift price following the local policy on business gifts and entertainment. A gift should never be accepted if it influences judgement or contravenes the law.

# 4

## RESPECT FOR THE ENVIRONMENT AND BIODIVERSITY



**The environmental stakes are no longer to be demonstrated. Scientific reports underline the need to reduce the negative consequences of human activity as quickly as possible.**

The Alliance Marine Group does not envisage its development outside the rules and laws dictated by the states and must, whenever reasonably possible, anticipate and apply better-disposing rules. The Group considers the challenges of climate change and the national and European objectives for reducing greenhouse gas emissions. It guides its real estate, industrial and commercial choices, adapts its organisations, and changes its operating methods according to this objective.

As in the hummingbird legend (see appendix), every employee must, do his or her part daily and contribute to the ongoing reduction of the Group's overall carbon footprint.

**The Alliance Marine Group, therefore, expects each employee to do his or her part:**

- Respects all environmental rules and procedures.
- Feels responsible by actively contributing to improving and reducing the environmental impact of its day-to-day activities.
- Reports any malfunction that may pose a risk to the environment, informing his or her hierarchy or any other person authorised to deal with the problem.
- Participates with suppliers and partners in the promotion of the importance of respecting environmental protection rules.

# 5 OUR SUPPLY CHAIN

**The Group's suppliers and subcontractors must share our requirements or get on board to build a regular and profitable collaboration with them.**

## 5.1 VIGILANCE IN THE RESPECT OF OUR PRINCIPLES BY SUPPLIERS

The Group undertakes to implement the following actions to maintain a responsible approach towards its suppliers and subcontractors:

Establishing a fair and trusting relationship with our suppliers and subcontractors

- Respecting the confidentiality of information
- Treating our suppliers fairly

To undertake to pay our suppliers within the payment deadlines following the law in force in their countries of activity.

Comply with the founding texts (see appendix)

- Human rights and working conditions
- Law concerning the security of persons, information, and the protection of personal data
- Discrimination
- Harassment
- Combating forced and child labour

Ensure the participation of its suppliers and subcontractors in this process through the appended Supplier Charter.

# 6

## COMMUNICATION AND MONITORING OF THE APPLICATION OF THE CODE OF BUSINESS CONDUCT

### 6.1 COMMUNICATION OF THE CODE

This Code of Business Conduct is intended for each of the Group's employees.

It can be downloaded online from the intranet sites of the Group's various subsidiaries.

At the same time as this Code was distributed, a Group Ethics Committee was set up with the task of carrying out three tasks:

- Monitor the proper dissemination and application of the Code of Business Conduct and the principles it upholds.
- Respond to any request transmitted by Group employees or third parties, whether it is a request for clarification or a question concerning the interpretation of the Code and its application, or a request addressed for alleged non-compliance with one of the Group's ethical principles.
- To be a driving force behind proposals to develop the Group's policy and actions in terms of ethics and Corporate Social Responsibility (CSR).

### 6.2 WHISTLEBLOWING MANAGEMENT

Any employee or a third party may report non-compliance with the rules of conduct set out in the Group's Code of Business Conduct. To this end, any employee or third party may exercise his or her right to alert in a disinterested manner and good faith by letter or e-mail, **following the appendix entitled «procedure for whistleblowing collection».**

The procedures put in place by the Group for the whistleblowing collection and processing guarantee strict confidentiality of the identity of the whistleblower, of the persons concerned by the whistleblowing, and of the information collected by all the recipients of the whistleblowing.

The Group also undertakes to ensure that no employee is subjected to any form of discrimination, harassment, or other reprisals as a result of exercising the whistleblowing right.

The primary contact person for whistleblowing management is:

**Anne-Laure GIANNESINI**

[annelauregiannesini@alliancemarine.fr](mailto:annelauregiannesini@alliancemarine.fr)

# APPENDIX

## FOUNDING TEXTS

### A. THE TEN PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT

The Ten Principles are drawn from the following instruments:

- Universal Declaration of Human Rights;
- International Labour Organization Declaration on Fundamental Principles and Rights at Work;
- Rio Declaration on Environment and Development;
- United Nations Convention against Corruption.

The principles are as follows:

#### Human rights

1. Businesses should promote and respect the protection of international human rights law within their sphere of influence; and
2. Ensure that their own companies are not complicit in human rights abuses.

#### Labour law

3. Companies are called upon to respect freedom of association and to recognise the right to collective bargaining;
4. The elimination of all forms of forced or compulsory labour;
5. The effective abolition of child labour; and
6. The elimination of discrimination in employment and occupation.

#### Environment

7. Businesses are encouraged to apply the precautionary approach to environmental problems;
8. Undertake initiatives to promote greater environmental responsibility;
9. To promote the development and dissemination of environmentally friendly technologies.
10. Businesses are urged to act against corruption in all its forms, including extortion and bribery.

### B. THE 8 FUNDAMENTAL CONVENTIONS OF THE ILO

The 8 ILO Fundamental Conventions are as follows:

- Forced Labour Convention No. 29 of 1930, ratified in 1939
- The Freedom of Association and Protection of the Right to Organise Convention No. 87 of 1948, ratified in 1951
- The Right to Organise and Collective Bargaining Convention No. 98 of 1949, ratified in 1951
- The Equal Remuneration Convention No. 100 of 1951, ratified in 1953
- The Abolition of Forced Labour Convention No. 105 of 1957, ratified in 1969
- Discrimination Convention No. 111 of 1958, ratified in 1981
- Convention No. 138 on the Minimum Age for Admission to Employment, 1973, ratified in 1990
- The Worst Forms of Child Labour Convention No. 182 of 1999, ratified in 2001.



# SUPPLIER CHARTER

## 1. Child labour

The employment of children under age 15 is prohibited under ILO principles, the UN Convention, and national laws. The rights of young workers must be respected. If a young person under age 18 is hired, they must not be assigned to dangerous or arduous work, and they must not work at night or overtime.

## 2. Discrimination

No discrimination shall be tolerated on the grounds of sex, age, religion, race, caste, birth, social origin, sexual orientation, family responsibilities, marital status, disability, ethnic and national origin, nationality, membership of workers' organisations, including trade unions, political membership or opinion, or any other condition which could give rise to discrimination.

## THE LEGEND OF THE HUMMINGBIRD

One day, says the legend, there was a vast forest fire. All the terrified animals, dismayed, watched helplessly the disaster. Only the little hummingbird was active, fetching a few drops with its beak and throwing them on the fire. After a moment, the armadillo, annoyed by this derisory agitation, said to him: «Hummingbird! Aren't you crazy? It is not with these drops of water that you are going to put out the fire!»

And the hummingbird said: «I know that, but I'm doing my part.»

## 3. Forced labour

No form of forced labour can be tolerated in the same way as slavery, which violates fundamental human rights. The employer shall not withhold any part of the wages, profits, property, or documents such as identity papers from its employees to force them to continue working in the enterprise.

## 4. Working time

The employer must comply with applicable national laws and industry standards on working time and public holidays. Workers are entitled to at least one day of rest per week and all other leaves provided for by national law and collective agreements.



The employer must pay employees a wage at least equal to the minimum wage required by local legislation and is strongly encouraged to pay the industry standard wage following the applicable collective agreements. Where the legal minimum wage does not cover all living expenses, the employer is encouraged to provide additional compensation to meet these needs.

The employer should ensure that wages and various compensations and social or tax deductions are itemized for employees, including on their payslips; that they are paid accordingly to all applicable laws and collective agreements and in a way that is convenient for employees.

Overtime shall be increased at the rate required by the law of the country and paid on time. Disciplinary measures such as fines or other deductions from wages are prohibited.

### **5. Freedom of association**

Employees should be free to join organisations of their choice. Employers must recognise and respect the right of employees to freedom of association and collective bargaining.

### **6. Health and safety of workers**

The employer must provide a safe and healthy working environment and take the necessary precautions to prevent accidents and injuries that may affect workers' health. Explicit health and safety regulations and procedures must be established and followed, including providing personal protective equipment and access to drinking water.

### **7. Environment**

Plants must use products tolerated by international standards and display their safety data sheets. Waste and pollution prevention procedures and management (waste treatment, handling and disposal of chemicals and other hazardous substances, treatment of emissions and effluents) meet or exceed the minimum requirements prescribed by legislation. Besides, plants must progressively strive to minimise their impact on the environment.

### **8. Subcontractors and traceability**

The Company is invited to communicate the Code of conduct to its subcontractors involved in the final manufacturing stages carried out on behalf of Alliance Marine. Our objective is that progressively all the actors in the supply chain comply with this Code of conduct.

### **9. Management system**

The Company must define and implement a social responsibility policy, which ensures that the Code of conduct requirements can be met. This policy aims to place clear written procedures for each of the points and document all actions taken.

# PROCEDURE FOR WHISTLEBLOWING COLLECTION

Article 5.2 of this charter states that «any employee or third party may report non-compliance with the rules of conduct set out in the group's code of business conduct».

In application of this provision, this document has been drawn up to describe the whistleblowing procedure, with a view to encouraging and supervising the reporting by employees and external or occasional collaborators of illicit, dangerous or contrary to the code of conduct facts occurring in the company.

## ARTICLE 1 - What facts can be the subject of an internal whistleblowing?

The purpose of the procedure for collecting internal whistleblowing is to encourage and supervise the reporting of facts likely to constitute:

- a crime or misdemeanour;
- a serious and manifest violation of the law or regulation;
- a threat or serious harm to the public interest;
- facts relating to conduct or behaviour contrary to those set out in the ethical charter.

## ARTICLE 2 - Who can be a whistleblower?

The author of a report under this whistleblowing procedure may be an employee of the company or a casual employee.

The whistleblower must:

- be a natural person;
- have personal knowledge of the facts he is reporting;
- act in good faith and therefore do not raise an abusive whistleblow to harm others;
- act in a disinterested manner, i.e., without benefiting from any advantage or remuneration in return for his whistleblowing;
- disclose in a manner necessary and proportionate to safeguard the interests involved.

## ARTICLE 3 - How to raise an alert?

Except in cases of severe and imminent danger or risk of irreversible damage, a professional alert must first be reported internally.

The internal alert can be sent to one of the following recipients:

- **Anne-Laure GIANNESINI**  
[annelauregiannesini@alliancemarine.fr](mailto:annelauregiannesini@alliancemarine.fr)  
Group Legal and HR Manager
- **Francisca ANDRÉANI**  
[franciscaandreani@alliancemarine.fr](mailto:franciscaandreani@alliancemarine.fr)  
Project Manager Alliance Marine
- **Jean-Paul ROCHE**  
[jeanpaulroche@alliancemarine.fr](mailto:jeanpaulroche@alliancemarine.fr)  
CEO
- **James SAUNDERS**  
[jsaunders@typhoon-int.co.uk](mailto:jsaunders@typhoon-int.co.uk)  
Operational Director

The alert can be raised by any means (mail, e-mail, telephone call, etc.).

If the report is made by telephone or in a private meeting, it must be confirmed in writing.

The letter or e-mail must indicate in the subject line that it is a report of an alert.

The alert should include the following elements:

- the identity, function, and contact details of the whistleblower;
- the identities, functions, and contact details of the person(s) who are the subject of the alert;
- the description, and any evidence of the facts reported.

As soon as an internal alert is received by one of the recipients mentioned above, the whistleblower shall be informed in writing without delay of the alert receipt, of the reasonable period needed to examine the alert admissibility and of the arrangements for informing the author of the action taken on the alert.

## **ARTICLE 4 - Handling of the internal alert**

### **ARTICLE 4-1 - Examination of the alert admissibility**

Each alert shall be examined in advance to check whether it is admissible in the light of the conditions set out in Articles 1 to 3.

In particular, the alert must fall within the scope of the whistleblowing system, be presented objectively, without malice, and relate to facts directly observed by the whistleblower and which can be materially verified.

In principle, alerts made anonymously are inadmissible. They cannot be processed unless the seriousness of the facts mentioned is established and the factual elements are sufficiently detailed, and only after a prior examination by the first addressee of the alert to decide on the appropriateness of the follow-up.

The whistleblower is informed of the admissibility of his or her alert within a maximum of two months. If the alert is not accepted, all the data communicated is destroyed without delay.

### **ARTICLE 4-2 - Recording the alert**

Only the following data may be recorded and processed:

- identity, function, and contact details of the whistleblower;
- identities, functions, and contact details of the persons concerned by an alert;
- identities, functions, and contact details of persons involved in the collection or handling the alert;
- reported facts and any evidence gathered in the course of verifying the reported facts;
- report on verification operations;
- follow-up to the alert.

### **ARTICLE 4-3 - Investigation**

The analysis of alerts and the investigation shall be carried out by the Ethics Committee referred to in Article 3 of this procedure.

All recorded information is checked for accuracy. Additional information may be requested from the whistleblower.

An investigation is carried out to determine the reality and materiality of the facts reported. If the facts justify it, third parties specialised in specific areas beneficial to the investigation (notably IT, finance, accounting) may be called in.

In this case, these third parties shall contractually undertake not to use the data of which they become aware for purposes other than those necessary for the investigation, to ensure the confidentiality of such data, to respect the period of retention of such data, and to destroy or return all personal data media at the end of their service.

### **ARTICLE 4-4 - Information to the whistleblower and the person concerned**

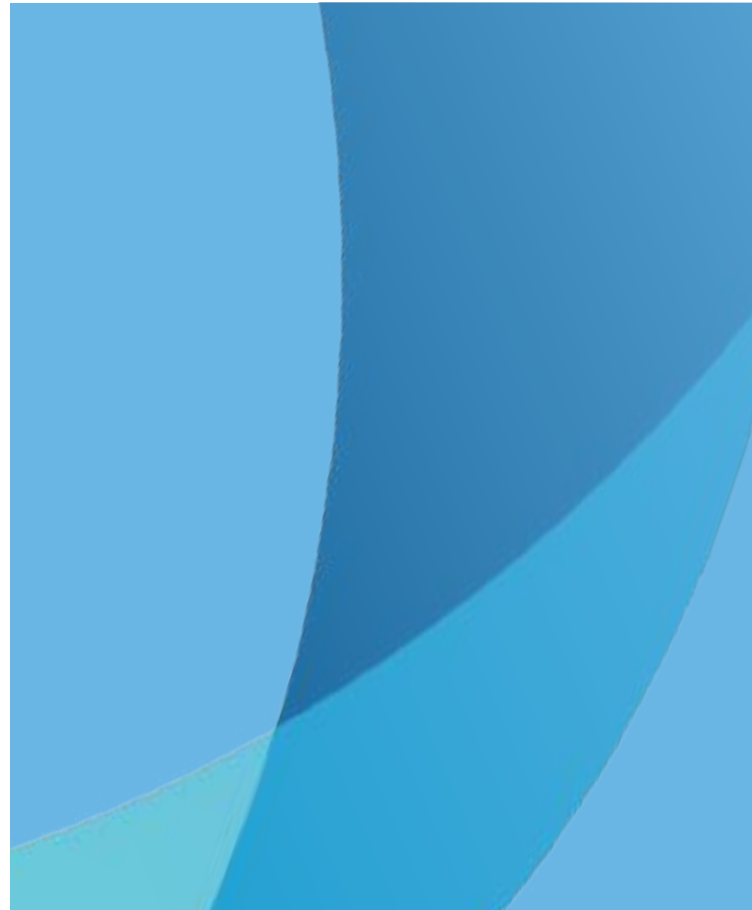
The whistleblower is informed about the follow-up of the alert and the progress of any ongoing investigations.

At the end of the investigation, the decision must be motivated, formalised, and communicated to the whistleblower by one of the ethics committee members.

Any person concerned by an alert shall be informed, as soon as the alert is registered, by the person responsible for the processing:

- of the facts of which he is accused to be able to exercise his rights of defence;
- how to exercise their rights of access and rectification of their data.

If the controller has reliable and materially verifiable evidence, it may take all precautionary measures to prevent the destruction of any material relating to the alert before informing the person concerned by the alert.



### **ARTICLE 5 - Confidentiality of data, right of access and storage**

#### **ARTICLE 5-1 - Confidentiality safeguards**

The company undertakes to take all necessary measures to guarantee strict confidentiality, in particular by persons having knowledge of alerts, of the identity of the whistleblower, the identity of the person(s) concerned by the alert, and the nature of the facts reported, throughout the processing of this alert.

In all cases, the whistleblower identity will only be communicated to the persons in charge of the alert processing and will never be transmitted to the person concerned by the alert, except with the express agreement of the whistleblower, even if the person concerned is a person authorised to collect alerts.

#### **ARTICLE 5-2 - Right of access to data**

The whistleblower (or the person(s) concerned by the alert) may access, upon request to the person in charge of the processing of the alert, the data concerning them and ask for the rectification or deletion of such data if it is inaccurate, incomplete, ambiguous or outdated.

### **ARTICLE 5-3 - Data retention and security measures**

The person in charge of processing the alert shall take all necessary measures to preserve the security of the data throughout the processing and storage of the data.

Personal data recorded in connection with a warning not followed by disciplinary or judicial proceedings shall be destroyed or archived, after anonymisation, within two months of the closure of the verification operations.

Where disciplinary proceedings or legal proceedings are initiated against the person who is the subject of the alert or the perpetrator of an unlawful alert, the data relating to the alert shall be kept until the proceedings or legal proceedings have been completed.

### **ARTICLE 6 - Whistleblower protection**

The whistleblower may not be sanctioned, dismissed, or discriminated against in any way, directly or indirectly, for having raised an internal alert in good faith and compliance with this procedure.

Thus, no disciplinary or discriminatory measures may be taken against a whistleblower who has acted in good faith, even if the facts reported turn out to be unfounded.



In case of disclosure of a legally protected secret, the whistleblower is not criminally liable.

Disclosure of the whistleblower's identity without his or her consent is punishable by two years imprisonment and a fine of €15,000.

Any person who obstructs the raising of an alert, in any way whatsoever, is liable to one year's imprisonment and a fine of 15,000 euros.

The author of a complaint for defamation against a whistleblower may be sentenced to a civil fine of up to 30,000 euros if his or her civil action is abusive or dilatory.

### **ARTICLE 7 - Communication of the scheme**

This scheme is distributed by e-mail to all employees and given to each new employee on recruitment.



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**TYPHOON**

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