

# DORIS GROUP PROFESSIONAL WHISTLEBLOWING SYSTEM

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## 1. THE PROFESSIONAL WHISTLEBLOWING SYSTEM

In order to encourage irreproachable professional ethics and preserve the trust of its clients and partners, DORIS Group (hereinafter referred to as "**DORIS**") has set up a Professional Whistleblowing System (the "**System**") on behalf of all its subsidiaries and entities.

This allows employees as well as external and occasional collaborators (hereinafter indifferently referred to as the "**Collaborator(s)**") to report problems and possible breaches of the ethical principles defined within the Group's Code of Conduct, concerning corruption or influence peddling, and more generally offenses to the treaties, laws and regulations in force, of which they have personal knowledge within the framework of their activity.

The System is complementary to traditional communication channels that allows for any routine exchange within organisations and with the hierarchy, and does not exempt from their responsibility those persons who would be required to make certain mandatory reports in the specific cases where criminal law so provides.

The operating procedures of the System and the conditions for processing personal data collected as a result of the System are presented below.

## 2. BREACHES THAT MAY BE THE SUBJECT OF A REPORT

### What may be reported?

The following may be the subject of a report (hereinafter the "**Report(s)**"):

- the existence of conduct or situations contrary to the ethical principles defined within the Group's Code of Conduct concerning corruption or influence peddling;
- crimes or offenses ;
- serious and manifest violations of an international commitment regularly ratified or approved; of a unilateral act of an international organisation taken on the basis of such a commitment, of the law or regulations; or
- serious threats or harm to the public interest.

**Such Report must be made selflessly and in good faith in respect of facts of which the persons making the Report have personal knowledge.**

Facts, information or documents covered by national defence secrecy, medical secrecy and the secrecy of relations between a lawyer and his or her client may not be the subject of a Report under this System.

As examples, a Report could be about:

- the violation of :
  - anti-bribery laws ;
  - competition law ;
  - banking and accounting law ;

- facts likely to constitute :
  - an internal or external fraud ;
  - a situation of moral or sexual harassment ;
  - a security risk.

### 3. PROCEDURES FOR ISSUING REPORTS

By decision of the Chairman and CEO of the DORIS Group:

- The person functionally designated to collect Reports within the company is the Group Compliance Officer (hereinafter the “**Referent**”).
- The structure in charge of processing Reports is an ad-hoc committee (hereinafter the **Whistleblowing Committee**) made up at group level of:
  - the Group Compliance Officer,
  - the Group Finance Manager,
  - the Head of Compliance of the region or country concerned by the facts reported.

This Whistleblowing Committee ensures that collegial decisions are made to define and undertake the follow-up actions. It takes into consideration the local jurisdictional context of the entity in which the events took place. Its members are subject to reinforced confidentiality obligations.

#### **How can we report ?**

The Collaborator who decides to use the System to issue a Report can contact the Referent, using an " Ethical Incident Form" available on the DORIS institutional website [www.dorisgroup.com](http://www.dorisgroup.com), or by writing an explanatory message which can be sent:

- by electronic to the following e-mail address: [compliance.incident@dorisgroup.com](mailto:compliance.incident@dorisgroup.com);

- or by post by writing to: DORIS Group SA - Direction de la Conformité - 58A rue du Dessous des Berges - 75013 Paris, mentioning "CONFIDENTIEL" on the envelope.

A model " Ethical Incident Form " can be obtained on paper or on the group or entity intranet.

The identity of the person issuing a Report (hereinafter the “**Author**”) and all the information collected will remain strictly confidential. For his part, the Author also undertakes to keep the questions, data and information that were the subject of the Report strictly confidential.

## 4. GOOD REPORTING PRACTICES

In order to enable the processing of the Report, it is important to describe the situation precisely, indicating the objective facts, the dates on which they were committed, the names of the persons involved, and to present the available evidence necessary to verify the alleged facts (reports, documents, letters, etc.).

The wording used to describe the nature of the facts reported should reflect their alleged nature. Only the data supporting the rationale of the Report should be communicated.

**The Author must keep this information strictly confidential** and will only be released from this obligation if the Referent fails to take due care (refer to chapter 7).

The Author shall also provide all contact details allowing, if necessary, an exchange with the Referent.

## 5. ANONYMOUS REPORTS AND DATA CONFIDENTIALITY

Anonymous reports are not encouraged insofar as they make it difficult to carry out a thorough investigation to establish the facts and organise protection for the perpetrator.

**The Referent and the Whistleblowing Committee shall take all necessary precautions to preserve the confidentiality of the data communicated** or stored within the framework of the System, including data relating to the identity of the Author, the facts that are the subject of the Report and the identity of the persons concerned by the Report. In particular, access to the data processing is carried out by an individual identifier and password, which are regularly renewed, and the identity of the Author is treated confidentially so that he/she does not suffer any prejudice as a result of his/her action.

DORIS undertakes to keep the identity of the persons who make Reports strictly confidential. In particular, the identity of the Author will not be communicated to the persons who may be implicated, even in the context of the exercise by them of their right of access.

DORIS will only disclose the identity of the Author with the consent of this person and the identity of the persons implicated once the validity of the Report has been established.

However, the following may always be disclosed to the judicial authority if it so requests

- the identity of the Author;
- the identity of the persons implicated by the Author.

Anonymous Reports will only be treated if the seriousness of the facts mentioned is established and the Report is supported by sufficiently detailed factual elements. The Author who wishes to remain anonymous is also invited to give the Referent the means to exchange with him/her in order to facilitate the investigation of the reported alleged facts.

## 6. PROHIBITION OF DISCRIMINATORY SANCTIONS AND MEASURES

**The use of the System in good faith and in a selfless manner shall not expose the Authors to any sanction whatsoever, even if the facts subsequently prove to be inaccurate or do not give rise to any follow-up.** In particular, the Author shall not be excluded from any recruitment procedure, nor from access to training or internships and shall not be subject to any discrimination, direct or indirect, in terms of remuneration, profit-sharing, promotion or renewal of contract, for having reported irregularities. DORIS will not take any sanction or adverse action against a person who decides not to report in the System.

On the other hand, misuse of the System may expose the Author to disciplinary sanctions and legal proceedings.

## 7. PROCEDURE IN CASE OF LACK OF DILIGENCE ON THE PART OF THE REFERENT

If the Referent fails to verify the admissibility of the Report within two [2] month, the Author may sent the later to the judicial authority, the administrative authority or the professional associations.

If one of the above-mentioned bodies fails to deal with the alert within three [3] months, it may be made public.

In the event of serious and imminent danger or where there is a risk of irreversible damage, the warning may be brought directly to the attention of the judicial authority, the administrative authority or the professional bodies. It may also be made public.

## 8. PROCEDURES FOR HANDLING REPORTS

The Reports will be analysed with the utmost care by the Committee and will give rise to the investigations and actions deemed necessary, in compliance with the applicable regulations.

The data collected in the context of the Reports may be communicated to the Committee for the sole purpose of verifying or processing the aforesaid Reports.

### **Acknowledgement and processing time for Reports**

The Author shall be informed without delay, by means of a written and dated acknowledgement, of the receipt of his or her Report and of the reasonable and foreseeable time required to examine its admissibility. However, the acknowledgement of receipt does not mean that the Report is admissible, and a Report is inadmissible when it is clearly not within the scope of the System.

The Author will also be informed of the way in which he/she will be informed of the follow-up given to his/her Report.

Once the information transmitted has been verified, the Referent will inform the Author of the action taken. If the facts reported are proven, the Referent will inform DORIS management who will have to take the appropriate measures, including disciplinary measures.

### **Categories of data that may be processed in the context of the investigation of the Report**

In the context of the System, DORIS will only collect personal data relating to:

- the identities, functions and contact details of the Authors;
- the identities, functions and contact details of the persons implicated;
- the identities, functions and contact details of persons involved in the collection and processing of Reports;
- the facts reported;
- the elements collected in the context of the verification of reported facts;
- the reports on verification operations; and
- the follow-up actions taken as consequences of the Report.

## **9. DATA RETENTION PERIOD**

Any data relating to a Report which is considered not to fall within the scope of the System described above will either be destroyed or archived without delay after anonymisation.

Where the Report is not followed by disciplinary or judicial proceedings, the data relating to the Report shall be archived, after anonymisation, within two months of the closure of the verification operations. The Author and the persons concerned by the Report shall be informed of this closure.

When disciplinary proceedings or legal proceedings are initiated against the respondent or the abusive Author, the data relating to the Report are kept until the end of the legal proceedings.

As far as archives are concerned, they will be kept in accordance with the general archive retention policy applied within DORIS, for a period not exceeding, in any case, the time limits of litigation proceedings.

## **10. TRANSFERS OF PERSONAL DATA**

In the context of the processing of Reports, certain personal data relating to the Authors or persons named in the Reports may be transferred outside the European Economic Area, namely to the countries of DORIS Entities.

DORIS undertakes to ensure an adequate level of protection of the data transferred in this context, in accordance with the laws and regulations applicable to all DORIS entities and at least in accordance with the European General Data Protection Regulation (GDPR), in particular by signing Standard Contractual Clauses or by adhering to the Privacy Shield (including human resources data) for data recipients located in the United States.

## **11. RIGHTS OF INDIVIDUALS OVER THEIR PERSONAL DATA**

In accordance with the applicable legislation on the protection of personal data, persons identified in the context of the System have a right of access, rectification and deletion of personal data concerning them. They also have the possibility of requesting the limitation of the processing of their data and of defining directives concerning the fate of their data in the event of death. The persons identified in the context of the System may also contact the Data Protection Officer of their entity. If these persons believe, after having contacted DORIS, that their data rights are not being respected, they may lodge a complaint with the relevant data protection authority.

Any person who is a subject of a Report shall be informed should personal data relating to him or her is recorded, whether or not by computer, so that he or she can object to the processing of such personal data. Where precautionary measures are necessary, in particular to prevent the destruction of evidence relating to the Report, the person will be informed only after such measures have been taken.



## ANNEX 1

## ETHICS NOTIFICATION REPORT

For ethical irregularities within DORIS Group and its subsidiaries

1. REPORT IDENTIFICATION & DISTRIBUTION			
Report No.:	ENR-xxx	Revision :	00
First issue		Date: xx/xx/2017	
Issued by:		Position:	
Distribution:	Email : <a href="mailto:compliance.incident@dorisgroup.com">compliance.incident@dorisgroup.com</a> (à l'adresse du Responsable de la Conformité du <b>groupe DORIS</b> )		
	Destinataire : Chief Compliance Officer		
	CONFIDENTIEL		
2. EVENT CLASSIFICATION & STATUS (To be completed by company)			
Incident location & Classification	Event location		Field of Application (refer * Below)
	<ul style="list-style-type: none"> <li>- At work, inside premises <input type="checkbox"/></li> <li>- At work, outside premises <input type="checkbox"/></li> </ul>		<ul style="list-style-type: none"> <li>- "Group" sphere <input type="checkbox"/></li> <li>- "Market" sphere <input type="checkbox"/></li> <li>- "Community &amp; Environment" sphere <input type="checkbox"/></li> </ul>
- Incident to be counted in DORIS ethical statistics?			Yes <input type="checkbox"/> No <input type="checkbox"/>
Incident notification report status	Open: <input type="checkbox"/> Closed: <input type="checkbox"/>	Actions pending:	Ref.
3. DESCRIPTION OF EVENT			
Person(s) involved & position in Company			
Incident timing & location details			
Event witness(es)			
Event description			
Immediate actions taken			

4. EVENT ANALYSIS <span style="float: right;">(Several causes may apply)</span>			
4.1 - Event cause, according to you.	<i>(narrative on the root cause of the incident)</i>		
4.2 - According to you, event highlighting a lack of completeness of DORIS Code of Conduct?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Comments			
4.3 - According to you, event highlighting a non-conformity or non-respect of DORIS Code of Conduct?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Comments			
4.4 - According to you, event resulting from an activity of the employee outside his or her normal duties?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Comments			
4.5 - According to you, event resulting from other causes?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Comments			

**\* Field of Application**

In practice, the principles of ethics apply to three spheres in which DORIS operates:

- The sphere of the “**Group**”, i.e. its Employees, its Related Entities and its shareholders;
- The sphere of the “**Market**”, i.e. its clients, suppliers, partners, sub-contractors and competitors;
- The sphere of the “**Community and Environment**” in all the countries of the world in which DORIS operates