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# Whistleblowing System

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## Legislation

This **whistleblowing system** complies with **Law no. 2016-1691** of 9 December 2016, known as 'Sapin II', as well as **Law no. 2017-399** of 27 March 2017 on corporate duty of vigilance.

It applies to all Samsic Group employees, as well as third parties.

## Reasons for whistleblowing

Whistleblowing refers to raising concerns about:

- a crime or offence,
- a violation or attempted violation of an international commitment, a law or a regulation,
- a threat or serious harm to the general public interest,
- a behaviour which goes against the Samsic Group code of conduct.

## Examples

Forced labour

Discrimination

Corruption

Fraud

Environment

## How to report ?

- **Having concerns about a particular risk situation or a wrongdoing?**

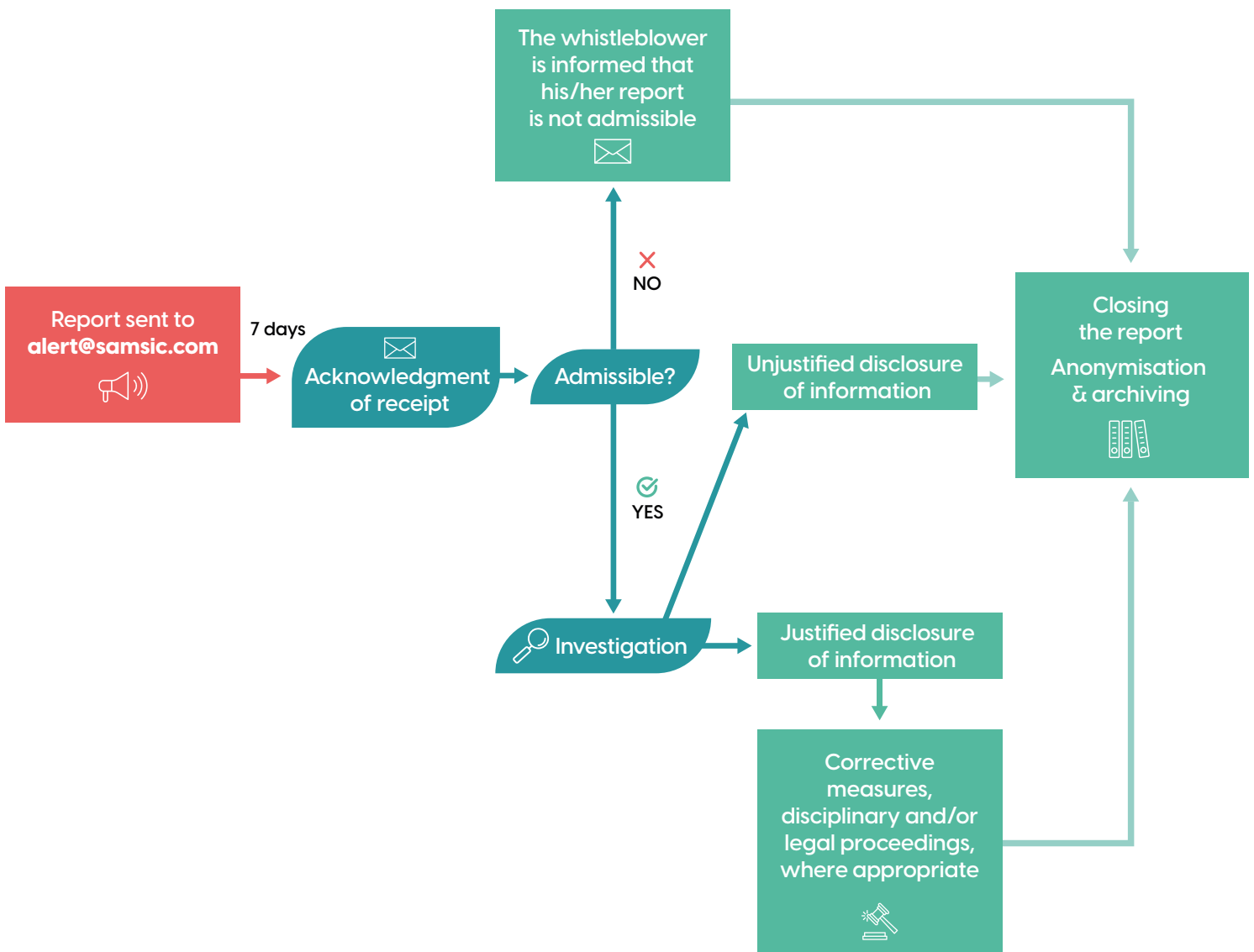
Please inform your line manager or Human Resources manager first.

- **Having legitimate reasons for wanting to use the whistleblowing system?**

Please fill in the whistleblowing report form, which can be downloaded [here](#), then email it to **alert@samsic.com**

## How are whistleblowing reports handled?

### WHISTLEBLOWING PROCEDURE



## Whistleblower status & protection

The whistleblower benefits from a special status if the following 4 criteria are met :

- be a natural person
- act without financial consideration
- act in good faith
- disclose serious facts

The whistleblower shall not be subject to reprisals.

## Admissibility

The whistleblower's statement is considered admissible if :

- it falls within the scope of the whistleblowing procedure
- the reporter of the disclosure meets the definition of a whistleblower
- the whistleblowing form is fully completed





## Investigation

Depending on the nature of the whistleblowing (related to human relations, business ethics or the environment), the investigation is carried out by the appropriate department: Human Resources, Legal Compliance or CSR. Specialist third parties may also be called in. Everyone involved is bound by an **obligation of confidentiality**.

If the complaint is well-founded, the Compliance Officer will forward his or her conclusions to the HR Department and, if necessary, to General Management, in order to decide on the corrective measures to be taken.

The whistleblower is kept informed of the progress of the investigation.

## Confidentiality

All data collected as part of the whistleblowing system is managed in the strictest confidence.

## Data archiving and destruction

The data collected as part of the whistleblowing procedure is kept, archived and destroyed in compliance with the legal and regulatory requirements.