



SOCOTEC

# WHISTLEBLOWER HANDBOOK

How to file a whistleblower complaint in the SOCOTEC Group



## WHISTLEBLOWER HANDBOOK

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do I file a  
whistleblower complaint?

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A close-up, low-angle shot of a person's hands typing on a silver laptop keyboard. The person is wearing a blue button-down shirt over a white tank top. The laptop is on a wooden desk. The background is a bright, out-of-focus office space with a window showing a view of a building. The lighting is warm and natural, suggesting daytime. The text '1. How do I file a whistleblower complaint?' is overlaid in white on the left side of the image.

# 1. How do I file a whistleblower complaint?

# DEDICATED WEBSITE

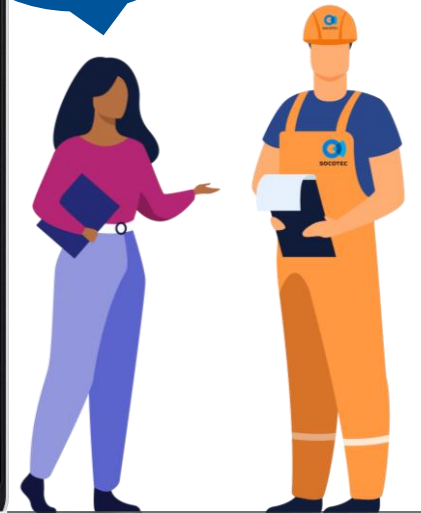
The SOCOTEC Group has a **dedicated website** available in **eight languages** through which you can file a complaint, no matter where you are.

You can access it  
**through the  
website**



No!  
You can access  
the dedicated  
website over the  
internet anytime,  
from anywhere!

Do I need to be  
at the office  
using the  
intranet to file a  
whistleblower  
complaint?



# BEING A WHISTLEBLOWER

- Anyone may file a whistleblower complaint, **whether or not they are a Group employee.**
- After you send your complaint, you will receive a **number** you can use to track your complaint through the website.
- You may wish to **remain anonymous**, but since that might make it more complicated for the Ethics Committee to conduct its investigation, make sure to submit all the supporting documents.
- Whistleblowers are **protected** and will not be fired for filing a complaint (unless the complaint is proven to be false).

- As a whistleblower, you will be covered by the protection policies as long as you **meet the following criteria:**
  - you are a natural person,
  - the complaint is impartial and in good faith,
  - you are reporting acts of which you have personal knowledge
  - the complaint pertains to acts that are in contravention of the provisions of the Code of Ethics.

1 INITIALISER 2 IDENTIFIER 3 DECRIRE 4 TRANSMETTRE

Nom\*

Prénom\*

Profession\*

E-mail\*

Téléphone

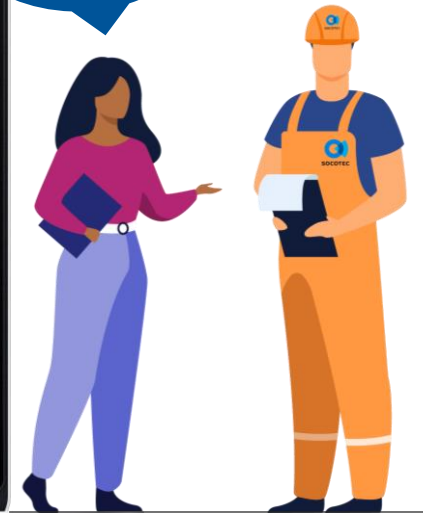
Je souhaite rester anonyme pour faire ce Signalement

**Important !**  
Il est recommandé que l'émetteur du signalement s'identifie, sachant que son identité sera traitée de façon confidentielle.  
À titre exceptionnel, vous pouvez effectuer un signalement de manière anonyme si la gravité des faits mentionnés est établie et que les éléments factuels transmis sont suffisamment détaillés.  
Vous êtes informé que si les faits mentionnés ne sont pas suffisamment graves ou suffisamment détaillés, ils ne feront l'objet d'aucun traitement et seront immédiatement rejetés. À l'inverse, si les faits sont suffisamment graves et détaillés, dans ce cas, le signalement sera traité mais l'instruction sera plus longue et moins efficace, car l'interaction entre vous et la personne en charge du traitement sera plus complexe.  
Lorsque vous cochez cette case « Garder l'anonymat », aucune donnée d'identification n'est requise, vous pouvez toutefois en fin de signalement renseigner votre email pour recevoir une copie et être notifié(e) des évolutions de votre signalement.

Retour > Suivant

Whistleblowers can be anonymous.

Got it!



# DOCUMENTS TO SUBMIT



## The complaint is **confidential**

- All complaints must be **valid** and based on **proven facts** that were personally experienced or ascertained by the whistleblower.
- Whenever possible, you **must provide evidence of the alleged facts**. You may do this by any means: written evidence, images, testimonials, etc.
- You may attach **supporting documents** to the complaint or send them later.

You must keep the acts you are reporting confidential, and the Ethics Committee guarantees the confidentiality of the whistleblower's identity, the identity of the person(s) involved and the acts that are the subject of the complaint. This requirement also applies to anyone questioned as part of the investigation, as well as the HR department, which may be asked to participate or implement the Ethics Committee's recommendations.


The complaint is also kept confidential from outside parties. It may be shared with the courts of competent jurisdiction only in rare serious cases.

Is my complaint admissible if I don't have any supporting documents?

Yes, as long as you're not making a false accusation or submitting a complaint with intent to cause harm, an ad hoc investigation will be launched.







2.

When  
should I file a  
whistleblower complaint?

# SITUATIONS THAT CALL FOR A WHISTLEBLOWER COMPLAINT



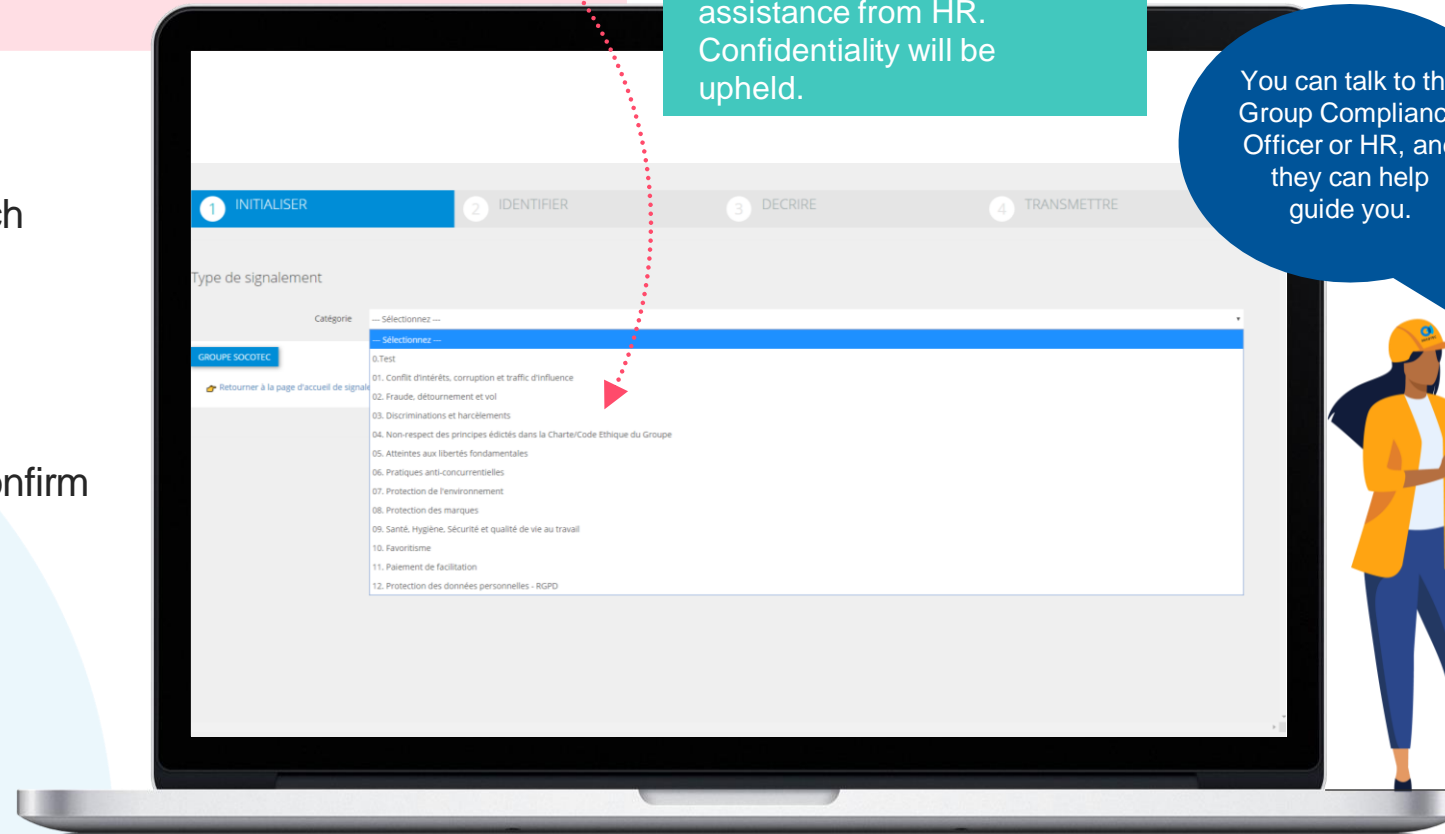
The website <https://alerts.socotec.com/entreprises> lists **different situations** in which a whistleblower complaint may be filed.

If you have any questions about a situation, you may ask the Group Compliance Officer for an opinion or get assistance from HR. Confidentiality will be upheld.

You can talk to the Group Compliance Officer or HR, and they can help guide you.

What if I'm not sure about a situation?

- Generally speaking, the cases being reported must be in breach of the provisions of the Group's Code of Ethics.
- When you select a situation, an example appears so you can confirm that it matches the events you experienced or witnessed.



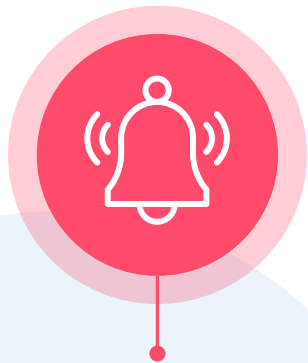


# TIME FRAME AND PROCEDURES FOR PROCESSING A WHISTLEBLOWER COMPLAINT

Barring any unusual complications, deterioration in the overall situation or an occurrence of force majeure, it takes **two months** to process a complaint.

**The Ethics Committee meets** during that time to assess **the admissibility** of the complaint and to decide **how to proceed**.

You can track the progress of the complaint **in real time** through **the dedicated website**.



The members of the Ethics Committee **consider the complaint within five business days**.



**An investigation is launched** to interview the whistleblower and the person(s) involved, and to **verify the alleged facts**. If necessary, the Group Compliance Officer travels to conduct the investigation.



The Ethics Committee may contact any helpful person during the investigation – some people are even sought out as experts!

I've been contacted in connection with a complaint. Should I be concerned?



A group of four people, three men and one woman, are looking at a large computer monitor in a server room. The monitor displays lines of code and data. The people are looking intently at the screen. The background is dark with some blurred lights.

3.

Who  
responds to the  
complaint?



# GROUP NETWORK



The members of the **Ethics Committee** are:

**Bastien Soret**

*General Counsel, SOCOTEC Group*

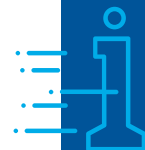
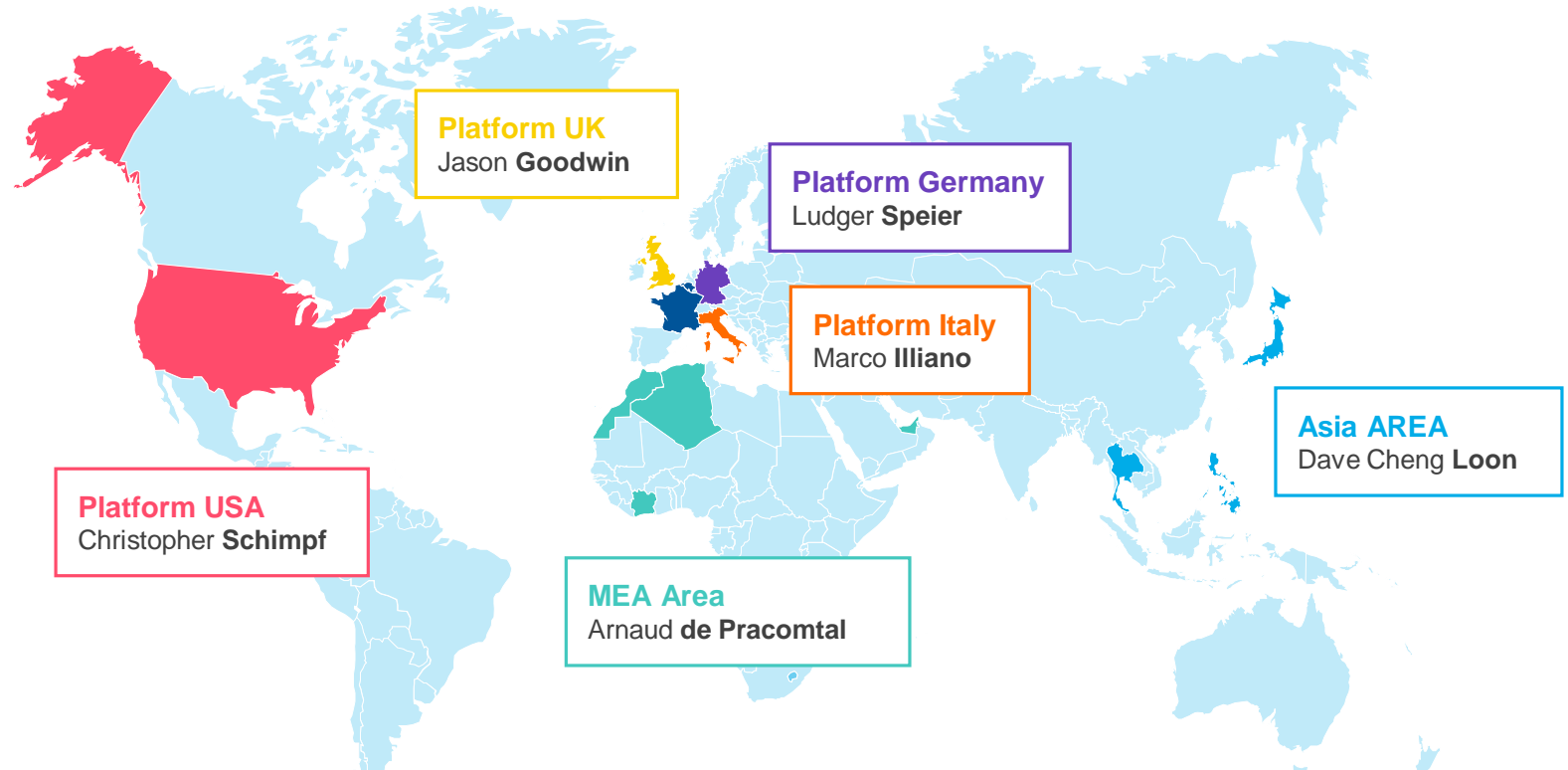
**Sébastien Botin**

*HR Director, SOCOTEC Group*

**Clémence Cattelain**

*Compliance Officer, SOCOTEC Group*

The Group has created a network of **local Compliance Officers**.



In some cases, during the course of the investigation, the Ethics Committee may call on the Local Compliance Officers to provide support or share their on-the-ground expertise.

You may also contact them if you have any questions about a situation.





**SOCOTEC**

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## **CONTACT**

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