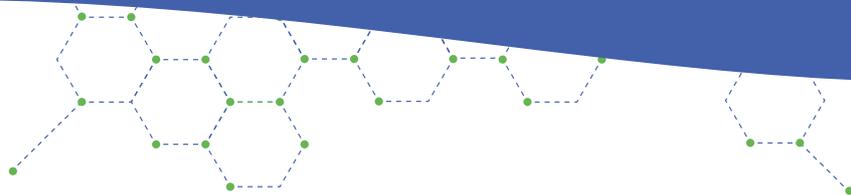


# WHISTLEBLOWING PROCEDURE

HTL GROUP

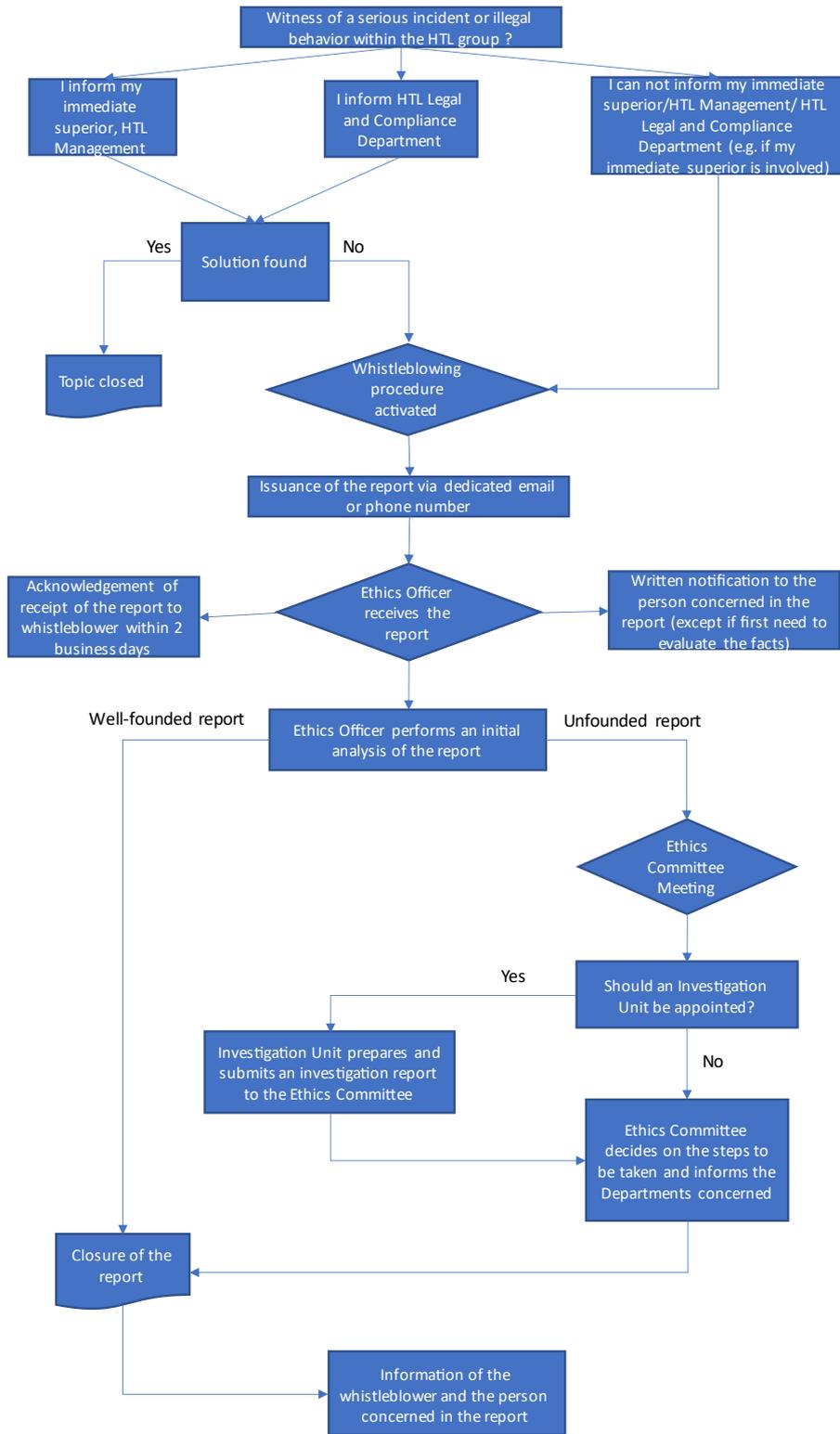


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***If you have any questions about this process or the HTL Group’s whistleblowing procedures, please do not hesitate to contact the HTL Group Ethics Officer by emailing: [ethique@htlbiotech.com](mailto:ethique@htlbiotech.com)***

# 1. SYNTHESIS – HTL WHISTLEBLOWING PROCEDURE



## 2. SCOPE OF APPLICATION

### 1) What is the whistleblowing procedure for?

- To allow each employee of the HTL Group to blow the whistle on a serious action or behaviour that is illegal or contrary to the HTL Group's Code of Conduct and Ethics, if internal dialogue is not possible, has not produced results, or has been broken off
- To allow third-party partners of the HTL Group to blow the whistle on a serious action or behaviour that is illegal or contrary to the HTL Group's Code of Conduct and Ethics
- To protect the whistleblower when acting in good faith, in accordance with the requirements of the French Sapin II law (2016)
- To assess any whistleblowing report received and take the appropriate action to avoid the negative consequences of non-compliance and inappropriate behaviour

### 2) Who can be a whistleblower?

- All HTL Group employees (internal or external, temporary or occasional)
- All parties involved in a business relationship (e.g. suppliers and clients of the HTL Group)

### 3) On what actions can you blow the whistle?

Any activity or behaviour that appears to be in breach of applicable laws and regulations and/or the HTL Group's Code of Conduct and Ethics can be the subject of a whistleblowing report, including:

- Any abuse of basic human rights
- Any illegal or fraudulent behaviour  
*E.g. theft*
- Any kind of corruption or influence peddling  
*E.g. awarding a contract to a supplier in exchange for a gift*
- Any serious damage to public health or the environment  
*E.g. concealed contamination*
- Any falsification of accounting or invoicing, and tampering with audits or internal financial controls
- Any misuse of the Group's assets  
*E.g. expenditure for illegal purposes*
- Any anti-competitive practices
- Any kind of discrimination, harassment (whether sexual or moral) in the workplace, gender bias, or any other kind of inappropriate behaviour in the workplace
- Any ill-intentioned disclosure of confidential information

## 4) What protection does the whistleblower have?

The whistleblower must:

- Be a natural person,
- Act in good faith,
- Report the action without trying to obtain direct compensation,
- Identify a serious action of which they have personal knowledge.

If these conditions are met, the whistleblower will be granted:

### Confidentiality

Guaranteed strict confidentiality of the identity of the whistleblower, the persons concerned, and the information gathered. The whistleblower may remain anonymous if they so wish. Reports that are not anonymous, however, are generally considered more reliable and facilitate the follow-up of reported allegations.

The number of people who receive and process reports is limited and they are under a strict obligation of confidentiality.

### Criminal protection

The personal details of the whistleblower remain confidential and must not be disclosed on pain of criminal sanctions.

Any person who attempts to prevent the whistleblower from making a report is liable to a criminal sanction for obstructing the transmission of a report.

### Protection under labour law, in particular against possible reprisals

The whistleblower may not be subject to disciplinary measures or legal proceedings in relation to the whistleblowing. The HTL Group undertakes to protect the whistleblower against any retaliation or reprisals by employees of the HTL Group. If the whistleblower believes that they are subject to any such retaliation or reprisal, they must report it to the HTL Group Ethics Officer or to their immediate superior, Management, the HR Manager, or the Legal and Compliance Department as soon as possible.

***Important: HTL relies on the responsibility of each individual when using this whistleblowing procedure. Conversely, any malicious use of the system, in particular the reporting of accusations that the reporter knows to be false, can result in criminal proceedings.***

### 3. RECEIPT AND PROCESSING OF THE WHISTLEBLOWING REPORT

This section identifies the people involved in the receipt and processing of a whistleblowing report and describes the different stages of the receipt and processing process.

#### 1) Who receives and processes the alert?

##### The Ethics officer

- Receives ethics reports and ensures that they are processed in an ethical and confidential manner;
- Contacts the whistleblower(s) and the persons involved;
- Centralises contact with HTL.

##### The Ethics Committee

- Steers the investigation of admissible reports;
- Decides on the measures to be taken and the investigations to be carried out;
- Liaises with the departments concerned.
- The committee consists of: The Ethics Officer, their deputy, and the President of the Group (or their deputy, the Chief Executive Officer of HTL or the Deputy Chief Executive Officer of HTL).

##### The Investigation Unit

- Appointed if necessary by the Ethics Committee on a case-by-case basis;
- Carries out the necessary investigations to deal with reports, with the support, if necessary, of the following departments: Human Resources, IT, Finance, Quality, HSE, etc.
- Issues the investigation report;
- Liaises with the Ethics Officer.

***NB: The people mentioned above take part in the procedure provided that they are not concerned in the report themselves. If any of these people are concerned in the report, they will be replaced by another HTL Group employee with the same or similar qualifications and/or position.***

## 2) Blowing the whistle

### By getting in touch with:

- Your immediate superior;
- HTL Management;
- The Human Resources Manager;
- The Legal and Compliance Department.

### By getting in touch with the HTL Group Ethics Officer:

- By email: [ethique@htlbiotech.com](mailto:ethique@htlbiotech.com)

### By getting in touch with our external provider:

- By telephone: **+33 9 73 79 55 10** (local call rate)  
From 9 a.m. to 6 p.m. Monday to Friday (answering machine when closed)
- By email: [htl@alert-online.fr](mailto:htl@alert-online.fr)

We encourage you to provide your name when you make a report in order to facilitate processing and the follow-up on the reported allegations; if however, you wish to remain anonymous, the Ethics Officer will not reveal your identity.

## 3) Receipt of the report

The Ethics Officer or the third-party service provider will acknowledge receipt of the report within two (2) working days by sending a personalised email to the whistleblower.

The Ethics Officer will also notify, in writing, the person concerned in the report of the information and data therein which concerns them. However, a certain amount of time may elapse between the receipt of the report and this notification. This time is necessary to assess the legitimacy of the report and the accuracy of the facts reported.

Following this notification, anyone concerned has the right to contact the Ethics Officer and access the information related to them.

## 4) Preliminary instructions for whistleblowing

The Ethics Officer carries out an initial analysis of the report in order to assess its level of seriousness:

- If, after this initial analysis, the report appears to be unfounded, the Ethics Officer will send an email in reply to the whistleblower in order to close the subject;
- If the report appears to be well-founded, the Ethics Officer will convene the Ethics Committee to decide on what action(s) to take.

## 5) Conducting investigations

The Ethics Committee will meet without delay to decide on the action(s) to be taken and launch the investigation.

The report will be handled by the Investigation Unit, which:

- Analyses the report and defines the terms of the investigation;
- Involves, if necessary, the experts concerned (HSE, HR, etc.);
- Carries out the investigation;
- Gathers evidence in order to determine the extent, mode, and causes of the alleged facts;
- Identifies the perpetrators;
- Draws up an investigation report and submits it to the Ethics Committee;
- Makes recommendations based on the experts' advice.

## 6) Decision on the steps to be taken

After analysing the investigation report issued by the Investigation Unit, the Ethics Committee will decide on the steps to be taken and notify the President of the HTL Group or their deputy, the Chief Executive Officer or the Deputy Chief Executive Officer, and the departments concerned:

- Further investigation;
- Disciplinary measures;
- Presenting a case to the Public Prosecutor;
- HR measures (professional conciliation, geographical or functional mobility, etc.);
- Request for assistance (psychological support, occupational physician, labour inspector, etc.).

## 7) Closing the report

The Ethics Officer will close the report after destroying or filing the dossier in accordance with the rules in force:

- If the truth of the facts is shown, the data gathered is kept until the end of the legal proceedings, and then filed in compliance with the applicable legal rulings;
- If the truth of the facts is not shown or if the initiation of disciplinary or legal proceedings is decided against, all the elements gathered must be destroyed within two (2) months from the end of the investigation.

The Ethics Officer will inform the whistleblower and the person concerned of the closure of the report..

## 8) Biannual review

The Ethics Officer presents a report on the incidents received and dealt with to the HTL Group CSR Committee every six (6) months.

## 4. PERSONAL DATA

The information gathered in the context of this whistleblowing procedure is processed for the purpose of gathering and processing reports in the areas mentioned above. In accordance with the amended Data Protection Act dated 6 January 1978 and the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation), you may exercise your rights to information, access, rectification, deletion or to restriction of the processing of your personal data by sending an email to: [ethique@htlbiotech.com](mailto:ethique@htlbiotech.com)

The whistleblowing system only records the personal data received from the whistleblower or necessary for the processing of the whistleblower's report, which is generally as follows:

- The identity, contact details, and position of the whistleblower(s);
- The identity, position, and contact details of the subject of the report;
- The identity, position, and contact details of the people involved in the receipt or management of the report, where necessary;
- The facts reported;
- Elements gathered in the context of the verification of the facts reported;
- The details of the verification operations after the report is received.

The HTL Group guarantees the confidential treatment of all information received through this system.

In particular, all personal data relating to the identity of the whistleblower, the details of the report, and any evidence provided are kept in encrypted files.

The identity of the whistleblower(s) is disclosed within the company, if necessary, only to those persons who need to know it for the purposes of verifying or dealing with the whistleblowing and its consequences, and only after they have signed a specific confidentiality agreement. The identity of the whistleblower(s) is never disclosed to the person(s) mentioned in the report.

Apart from the cases mentioned above, information identifying the whistleblower may not be disclosed without the consent of the person in question, except to the judicial authority or to comply with a legal requirement. Similarly, information identifying the person who is the subject of the report may only be disclosed once the validity of the report has been established, except to the judicial authority or to comply with a legal requirement.

The data gathered will be kept only for the time necessary to deal with the case in question. It will be destroyed as soon as keeping it no longer appears necessary from a legal point of view (in particular, depending on the duration of a litigation procedure) or, where technically possible, kept anonymously (i.e. by neutralising the personal data within the data retained). The personal data gathered within the framework of this whistleblowing procedure will be:

- **Deleted within two (2) months** after the end of the investigation, the truth of the facts is not shown or if the initiation of disciplinary or legal proceedings is decided against, **or**
- **Kept until the end of the legal proceedings, and then filed** in compliance with the applicable legal rulings, if the facts are shown to be true.