

# WHISTLEBLOWING CHARTER

As part of its responsible business approach, the HTL Group is implementing various measures aimed at:

- Ensuring the health, safety, and well-being of its employees,
- Protecting the environment,
- Preventing the risk of non-conformity with the applicable laws and regulations.

By means of this Whistleblowing Charter, the HTL Group undertakes to:

- Maintain a corporate culture where all employees can express their concerns and talk in all confidence, in particular with their immediate superior and the HTL Group management
- Encourage each employee or third party to raise an alert concerning information about facts that have occurred or are very likely to occur, that are illegal or contrary to the HTL Group's Code of Ethics (e.g. discrimination or harassment in the workplace; fraud; any act of corruption or influence peddling; expenditure for illegal purposes; theft; violations of human rights and fundamental freedoms, etc.)
- Enable employees to exercise their right to alert and withdraw from work in the event of serious and imminent danger (work situation that may present a danger to the life or health of the employee)
- Enable employees to exercise their right to alert the public health and environment (products or manufacturing processes that may present a serious risk to the health of the population or the environment)
- Implement a professional alert system that allows employees and third-party partners of the HTL Group to report in complete confidentiality
- To create and maintain a procedure that can be consulted by all, which provides a framework for the alert system and specifies in particular the procedures for collecting and processing an alert
- Protect whistleblowers who act in good faith, in particular to ensure that they benefit from the protection provided by law
- Evaluate any alert received and take appropriate measures to remedy the negative consequences of non-compliance and inappropriate behavior

## Who can send in a report?

- All employees of the HTL group,
- **Within the framework of an ethics alert:** all staff members, corporate officers, and under certain conditions, former employees<sup>1</sup>, job applicants<sup>2</sup>, as well as external and occasional collaborators<sup>3</sup> of the HTL group.

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<sup>1</sup> **Former employees** : Where the information was obtained in the course of that employment relationship within the HTL Group.

<sup>2</sup> **Job applicants** : Where the information was obtained as part of the application for employment with the HTL Group.

<sup>3</sup> **External and occasional collaborators** : Refers to any natural person who does not have an employment contract with one of the companies in the HTL group and who, in the course of his or her duties, works on behalf of one of the companies in the HTL group (e.g., co-contractors (customers, suppliers, etc.), subcontractors, temporary employees, trainees, etc.).

## How can you send in an ethical report?

### By getting in touch with:

Your immediate superior, HTL Management, the Human Resources Department, or 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** (9 a.m. to 6 p.m. Monday to Friday)

By email: [htl@alert-online.fr](mailto:htl@alert-online.fr)

### By contacting externally:

The competent authority, Defender of Rights, the Judicial Authority, the competent institution, body or agency of the European Union in the case of a violation of a right of the European Union.

### In public disclosure:

Public disclosure is only possible in the following cases:

- In the absence of treatment following an external report within a certain period of time
- In case of serious and imminent danger
- In case of imminent or obvious danger to the public interest
- When the external alert puts the whistleblower at risk of reprisals
- When the external alert has no chance of success

## How to make a report on a serious and imminent danger and on public health and the environment?

### By getting\* in touch with:

Your direct or indirect supervisor; The employer; A member of the Works Council; The HSE department.

*\* In the case of an alert concerning public health and/or the environment, you can use the channels indicated in the ethical alert.*

To find out how the HTL Group manages reports, and in particular, the rights and obligations of each party, please read the document entitled “WHISTLEBLOWING PROCEDURE – HTL GROUP”, available on our website at <https://htlbiotech.com>

15 may 2023,  
François FOURNIER, President

