



WHISTLEBLOWER CHARTER



Updated 29/01/2025

As part of its commitment to responsible business practices, the HTL Group has implemented various measures aimed at:

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

Through this Whistleblower Charter, the HTL Group commits to:

- Maintaining a corporate culture where all employees can express their concerns and engage in open dialogue, particularly with their direct supervisor and the HTL Group management,
- Encouraging every employee or third party to report information regarding events that have occurred or are highly likely to occur, which are illegal or contrary to the HTL Group's Code of Ethics (for example, discrimination or harassment at work; fraud; any acts of corruption or influence peddling; illegal spending; theft; violations of human rights and fundamental freedoms, etc.),
- Allowing employees to exercise their right to alert and withdraw in case of serious and imminent danger (a potentially life or health-threatening work situation for the employee),
- Allowing employees to exercise their public health and environmental alert rights (products or manufacturing processes that may pose a serious risk to public health or the environment),
- Implementing a professional alert system that allows employees and third-party partners of the HTL Group to report confidentially,
- Creating and maintaining a procedure accessible to all, that regulates the alert system and specifies the procedures for collecting and handling alerts,
- Protecting the whistleblower who acts in good faith, particularly by granting them the protection provided by law,
- Evaluating any alert received and taking appropriate measures to address the negative consequences of non-compliance and inappropriate behavior.

Who can make a report?

- All HTL Group employees .
- In the event of an ethic alert : all employees, corporate officers and, under conditions , former employee¹, job applicants², as well as external and occasional collaborators of the HTL Group³

How to make an ethical report?

Whistleblower portal : <https://htl.integrityline.com/>

By email to the dedicated address : ethique@htlbiotech.com

By contacting external authorities: The competent authority, the Defender of Rights, the judicial authority, the institution, or the body of the European Union competent for a violation of EU law.

Public disclosure: Public disclosure is only possible in the following cases :

- If no action has been taken following an external report within a certain period,
- In the event of serious and imminent danger,
- En cas de danger imminent ou manifeste pour l'intérêt général
- When the external report exposes the whistleblower to the risk of retaliation,
- When the external report is unlikely to lead to any outcome.

¹**Former employee:** when the information was obtained as part of the employment relationship within the HTL group

²**Job applicants :** when the information was obtained as part of this application within the HTL group

³**External and occasional collaborators :** designates any natural person who is not a holder of an employment contract with one of the companies in the HTL group, but who, as part of the performance of his mission(s), acts on behalf of one of the companies in the HTL group (e.g., co-contractors (clients, suppliers...), subcontractors, temporary workers, interns, etc.).

How to report serious and imminent danger, public health, and environmental risks?

By contacting internally: : Your direct or indirect manager ; The employer ; A member of CSE ; 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 section.*

To learn about the procedures implemented by the HTL Group for handling alerts, particularly the rights and duties of everyone involved, please refer to the document "HTL GROUP ALERT PROCEDURE," available on our website. <https://htlbiotech.com>

January, 29th 2025

François FOURNIER

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