

# ALERT PROCEDURE

GROUPE HTL



MAJ 30/01/2025

# Table of contents

<b>Preamble</b>	<b>3</b>
<b>1. Summary – Warning and withdrawal procedure in the event of serious and imminent danger</b>	<b>3</b>
<b>2. Summary – Alert procedure</b>	<b>4</b>
<b>3. Scope of application</b>	<b>5</b>
3.1. What are warning systems for?	5
3.2. Who can issue an alert ?	5
3.3. For which facts can you issue an alert?	5
3.4. What protection exists for ethical whistleblowers and for public health and environmental alerts ?	6
<b>4. Collecting and processing ethical alerts</b>	<b>7</b>
4.1. Who collects and processes alerts?	7
4.2. Issuing an alert	8
4.3. Receiving the alert	9
4.4. Alert pre-instruction	9
4.5. Carrying out investigations	9
4.6. Decision on action to be taken	10
4.7. Closing the alert	10
4.8. Half-year report	10
<b>5. Collecting and handling alerts concerning serious and imminent danger, public health and the environment</b>	<b>10</b>
5.1. Who collects and processes alerts?	11
5.2. Issuing an alert	11
5.3. Receiving the alert	12
5.4. Carrying out the investigation	12
5.5. Decisions on further action	12
<b>6. PERSONAL DATA</b>	<b>12</b>
<b>7. APPENDICES – INSTRUCTIONS FOR USE</b>	<b>13</b>

# Preamble

The purpose of this document is to outline the various whistleblowing procedures in place within the HTL Group.

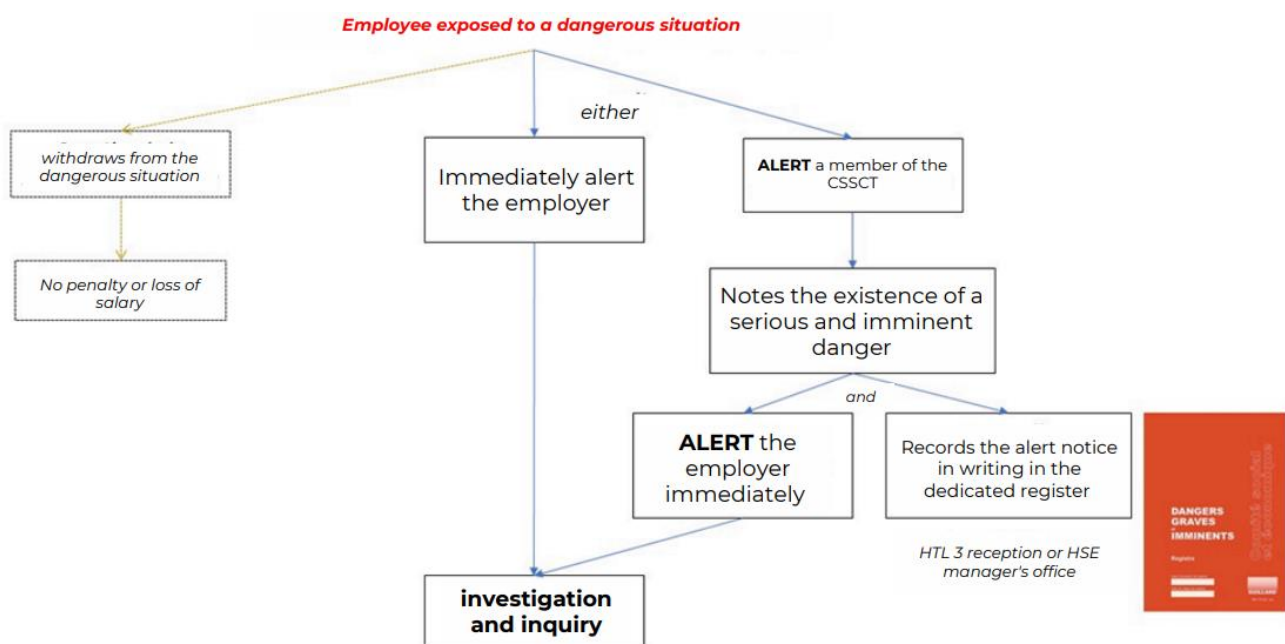
In accordance with the “SAPIN II” French law, an ethics alert system has been set up, but there are also other reporting systems, notably those set out in the French Labor Code:

- A right of warning and withdrawal in the event of serious and imminent danger,
- A right to alert on public health and environmental issues,

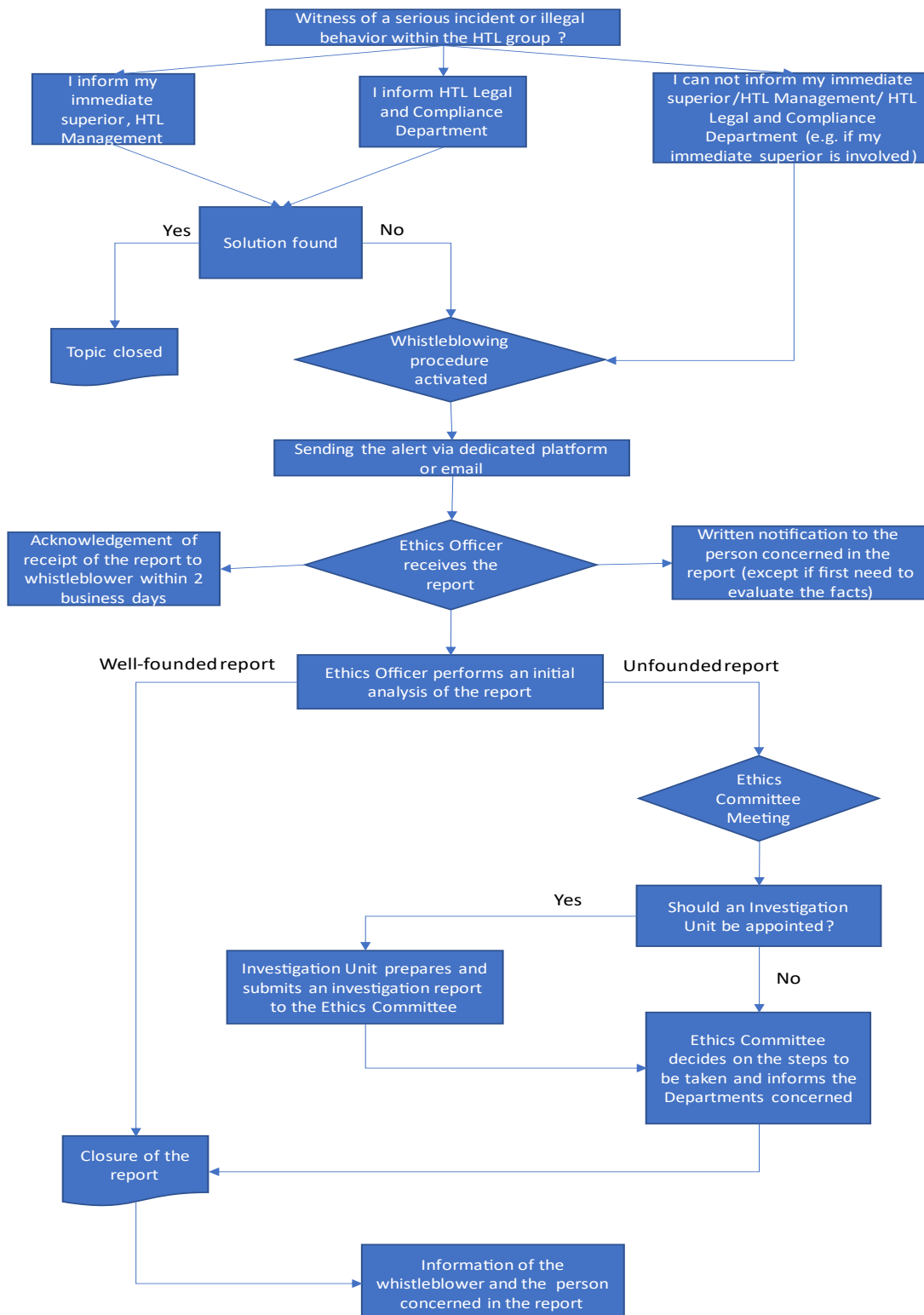
Public health and environmental whistleblowers have been given the same protection as ethical whistleblowers since law no. 2022-401 of March 21, 2022.

However, the right to alert and withdraw in the event of a serious and imminent danger only entitles employees to the specific protection provided for in article L4131-3 of the French Labor Code (i.e., protection against disciplinary sanctions and salary deductions for the period during which the employee has withdrawn from his or her post).

## 1. Summary – Warning and withdrawal procedure in the event of serious and imminent danger



## 2. Summary – Alert procedure



## 3. Scope of application

---

### 3.1. What are warning systems for?

---

- To enable any HTL Group employee to issue an alert concerning information on facts that have occurred or are very likely to occur, that are illegal or contrary to the HTL Group Code of Ethics or Code of conduct.
- Enable employees to exercise their right to alert and withdraw in the event of serious and imminent danger (a work situation that may present a danger to an employee's life or health).
- Protect whistleblowers who act in good faith, and without direct financial consideration, in line with the requirements of the French Sapin II law (2016) and the Wasserman laws (2022).
- Evaluate any alerts received and take appropriate action to avoid the negative consequences of non-compliance and inappropriate behavior.

### 3.2. Who can issue an alert ?

---

- All HTL Group employees .
- In the event of an ethics alert : all employees, corporate officers and, under conditions , former employee<sup>1</sup>, job applicants<sup>2</sup>, as well as external and occasional collaborators of the HTL Group<sup>3</sup> .

### 3.3. For which facts can you issue an alert?

---

#### 1. Ethics alert

Any activity or behavior that appears contrary to current laws and regulations and/or the HTL Group Code of Ethics may be the subject of an alert.:

- crime or misdemeanor,,  
*For example: a theft*
- A threat or harm to the general interest,
- A violation or attempted concealment of a violation of an international commitment duly ratified or approved by France,
- A violation or an attempt to conceal a violation of a unilateral act of an international organization taken on the basis of a regularly ratified international commitment, a violation or an attempt to conceal a violation of the law or regulations,
- The existence of conduct or situations contrary to the HTL Group's Code of Conduct and anti-corruption policy insofar as they are likely to constitute corruption or influence peddling.  
*For example : awarding a contract to a supplier in exchange for a gift, any falsification of accounting or invoicing, and any tampering with audits or internal financial controls, any*

---

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

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

<sup>3</sup>**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.).

*improper use of Group assets (expenditure for illegal purposes), any anti-competitive practice...*

The alert may not, however, relate to elements (facts, information and documents, whatever their form or medium) the revelation or disclosure of which is prohibited by provisions concerning national defense secrecy, medical secrecy, the secrecy of judicial deliberations, the secrecy of investigations or judicial inquiries, or the professional secrecy of lawyers.

## 2. Serious and imminent danger alert

- Situation characterizing a serious and imminent danger to the life or health of employees, as well as any defect observed in protection systems.

*For example: working on the edge of a roof without collective protection (lack of guardrail) or individual protection (lack of anchorage point to attach the harness), resulting in a risk of falling*

## 3. Public health and environment alert

- Any serious threat to public health or the environment

*For example : a case of concealed pollution*

## 3.4. What protection exists for ethical whistleblowers and for public health and environmental alerts ?

---

**This article 3.4 applies only to employees exercising their right to an ethics alert and/or their right to an alert concerning public health and the environment.**

### 1. Ethics alert

The author of the alert must:

- Be a natural person,
- Acting in good faith,
- Report without direct financial compensation,
- Report facts of which you have personal knowledge when the information was not obtained in the course of your professional activity, or in the case of serious facts that have been reported to you.

### 2. Public health and environment alert

The author of the public health and environmental alert must :

- Be an HTL Group employee,
- Acting in good faith,

If these conditions are met, the whistleblower benefits from the following protective guarantees :

## Confidentiality

Guarantee strict confidentiality of the identity of the author of the alert, the persons concerned and the information gathered. Thus, elements likely to identify the sender of the professional alert may only be disclosed, except to the judicial authority, with the sender's consent.

The author of an ethical alert may remain anonymous if he or she so wishes. Non-anonymous alerts, however, particularly those concerning serious or imminent danger, public health or the environment, are generally considered to be more reliable, and make it easier to follow up on the allegations reported.

The number of people who collect and process alerts is limited, and they are bound by a strict obligation of confidentiality with regard to all such information, particularly concerning the identity of the issuer of the alert.

## Civil protection - Criminal protection

When the reporting or public disclosure procedure is complied with, the beneficiaries of the protection cannot be ordered to pay damages for any harm caused by this reporting or public disclosure. The whistleblower must have had reasonable grounds for believing, when he or she did so, that this procedure was necessary to safeguard the interests threatened. Under these conditions, the whistleblower enjoys both civil and criminal immunity.

## Protection under labor law, particularly against retaliation

Whistleblowers acting in good faith and without direct financial consideration may not be subject to disciplinary measures or prosecution in connection with their whistleblowing. They may not be dismissed, punished or discriminated against in any way whatsoever for having reported facts in compliance with this procedure, even if the facts subsequently prove to be inaccurate or do not give rise to any further action. The HTL Group undertakes to protect the whistleblower against any retaliation or reprisals by an employee of the HTL Group. If the whistleblower believes that he or she is subject of such retaliation or reprisal, he or she must report it as soon as possible to [the HTL Group's Ethics Referent or to his or her line manager, Management, the Human Resources Department or the Legal and Compliance Department.](#)

***Important notice: HTL relies on the responsibility of each individual to use this alert procedure. On the other hand, abusive or malicious use of the system, in particular the communication of accusations that the author knows to be false, may give rise to legal proceedings.***

# 4. Collecting and processing ethical alerts

---

This section identifies the people involved in the collection and handling of an ethics alert, and describes the various stages in the process.

## 4.1. Who collects and processes alerts?

---

### The Ethics Referent

- Receives ethical alerts and ensures they are handled with respect for confidentiality and ethics ;
- Communicates with whistleblowers and respondents.

- Centralizes contacts with HTL.

## Ethics Committee

- Leads the investigation of alerts deemed admissible;
- Decides on the measures to be taken and the investigations to be carried out;
- Communicates with the relevant departments.
- It comprises : The Ethics Officer, his deputy, the Group Chairman (or his deputy, HTL's General Manager).

## The Investigation Unit

- Appointed, if necessary, by the Ethics Committee on a case-by-case basis;
- Carries out the investigations required to process alerts, with the support of the following departments if necessary: Human Resources, IT, Finance, Quality, HSE....
- Issues the investigation report;
- Communicates with the Ethics Referent.

**Note:** *The above-mentioned players are involved in the procedure provided that they are not themselves implicated by the alert. If one of these players is implicated by the alert, he or she will be replaced by another HTL Group employee with equivalent or similar qualifications and/or job level.*

## 4.2. Issuing an alert

---

### INTERNAL CHANNELS :

#### **Please contact :**

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

#### **Contact the HTL Group Ethics Officer**

- By e-mail to the dedicated address: [ethique@htlbiotech.com](mailto:ethique@htlbiotech.com)

### EXTERNAL CHANNELS :

#### **Please contact :**

- The competent authority (i.e., one of the authorities referred to in paragraph II of Article 8 of the Law of December 9, 2016 as amended by the Law of March 21, 2022),
- Human rights defender,
- Judicial authority,
- The European Union institution, body or agency responsible for dealing with an infringement of European Union law.

### PUBLIC DISCLOSURE

#### **Public disclosure is only possible in the following cases**

- In the absence of treatment following an external referral within a certain timeframe
- In the event of serious and imminent danger



- In the event of imminent or obvious danger to the public interest
- When external reporting puts the whistleblower at risk of reprisals
- When external reporting has no chance of success

We encourage you to state your name when making a report to facilitate its processing and the follow-up of reported allegations; if, however, you wish to remain anonymous, the Ethics Officer will protect your identity.

## 4.3. Receiving the alert

---

The Ethics Officer acknowledges receipt of the alert within seven (7) working days of its receipt, by sending a personalized e-mail to the whistle-blower. Acknowledgement of receipt does not constitute acceptance of the alert.

The Ethics Officer will also notify the person involved in the alert in writing of the information and data recorded concerning him or her. However, a certain amount of time may elapse between receipt of the alert and this notification. This is necessary to assess the legitimacy of the alert and the accuracy of the facts reported.

Following this notification, the person concerned has the right to contact the Ethics Officer and access information concerning him or her.

## 4.4. Alert pre-instruction

---

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

- If, after this initial analysis, the alert appears to be unfounded, the Ethics Officer sends an e-mail reply to the whistle-blower to close the matter;
- If the alert appears to be well-founded, the Ethics Officer convenes a meeting of the Ethics Committee to decide what action to take. Within a maximum of 3 months from acknowledgement of receipt of the alert, the author of the alert will be informed in writing of the measures planned or taken to assess the accuracy of the allegations and, where appropriate, to remedy the matter.

## 4.5. Carrying out investigations

---

The Ethics Committee meets immediately to decide on the action to be taken and launch investigations.

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

- Analyzes the request and defines the investigation procedures;
- Mandate, if necessary, the relevant experts (DSI, DRH...);
- Carry out the investigation ;
- Gather evidence to determine the extent, modalities and causes of the alleged facts;
- Identify the authors
- Drafts the investigation report and submits it to the Investigation Committee;
- Makes recommendations based on expert advice

## 4.6. Decision on action to be taken

---

After analyzing the Investigation Unit's report, the Ethics Committee decides on the action to be taken and communicates it to the Chairman of the HTL Group or his deputy, the Chief Executive Officer or the Deputy Chief Executive Officer, as well as to the departments concerned:

- Further investigations,
- Disciplinary measures,
- File a complaint with the public prosecutor,
- HR measures (work-life balance, geographical or functional mobility, etc.),
- Request for assistance (psychological support, occupational health physician, labor inspector, etc.).

## 4.7. Closing the alert

---

The Ethics Officer closes the alert after destroying or archiving the file in accordance with the rules in force:

- If the facts are proven to be true, the data collected is kept until the end of the required procedures, then archived in compliance with the applicable legal provisions;
- If the veracity of the facts is not proven, or if it is decided not to initiate disciplinary or legal proceedings, all the information collected is destroyed within 2 months of the end of the investigation.

The Ethics Officer informs the issuer and the respondent of the closure of the alert.

## 4.8. Half-year report

---

The Ethics Officer presents a report on the alerts received and processed to the HTL Group CSR Committee every 6 months.

# 5. Collecting and handling alerts concerning serious and imminent danger, public health and the environment

---

**Article L.4131-1** of the French Labor Code defines the right to alert. It specifies that “the worker shall immediately alert the employer to any work situation which he has reasonable cause to believe presents a serious and imminent danger to his life or health, as well as to any defect he observes in the protective systems.

**Article L4131-2** to 4 of the French Labor Code defines the right to warn of serious and imminent danger: a work situation which may present a danger to an employee's life or health.

**Article L4133-1** to 4 of the French Labor Code defines the right to alert for public health and the environment: products or manufacturing processes that pose a serious risk to public health or the environment.

## 5.1. Who collects and processes alerts?

---

### The employer

- The employer may be informed by an employee or by a representative on the CSE of the existence of a situation of serious and imminent danger, or of the use of products or manufacturing processes posing a serious risk to public health or the environment.

### Social and Economic Committee

- One or more CSE representatives observe, either themselves or through the intermediary of an employee, the existence of a situation involving serious and imminent danger, or the use of products or manufacturing processes posing a serious risk to public health or the environment.

### Special register

- The alert is recorded in a special register, the pages of which are numbered and authenticated by the committee's stamp (1 Serious and Imminent Dangers register and 1 Public Health and Environment alert register).
- To prevent falsification, the alert is dated, signed and authenticated by the committee's stamp :
- The workstations concerned by the cause of the observed hazard / or, where applicable, the products or manufacturing processes used or implemented by Groupe HTL that are the cause of the serious risk observed,
- The nature and cause of the hazard / or, if applicable, the potential consequences for public health or the environment of the risk identified,
- Names of exposed workers,
- The special register is kept under the employer's responsibility, and is available to staff representatives at the CSE, in the HSE manager's office or at the HTL3 reception desk.

### The Investigation Unit

- Composed of the employer and, where applicable, the representative(s) on the CSE.

## 5.2. Issuing an alert

---

### INTERNAL CHANNELS\* :

#### Please contact :

- Your direct or indirect manager ;
- The employer ;
- A member of the CSE;
- 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 on pages 8 and 9.

## 5.3. Receiving the alert

---

- An employee or representative(s) on the CSE who, themselves or through the intermediary of an employee, observes the existence of a situation involving serious and imminent danger, or the use of products or manufacturing processes that pose a serious risk to public health or the environment, immediately informs the employer.
- The alert is recorded in the special register provided for this purpose.
- There may be **disagreement** with the employer over the validity of the alert or the lack of follow-up within one month.
- If the alert is **validated**, the employer must carry out an investigation.

## 5.4. Carrying out the investigation

---

- If the report comes from a member of the CSE, the latter must be involved in the investigation. However, the presence of a member of the Works Council is recommended during the course of the investigation, regardless of the method used to report the serious and imminent danger in question, or the serious risk to public health or the environment arising from the use of products or manufacturing processes.
- The investigation unit immediately carries out an inquiry, after which a report is drawn up.
- . The employer, after discussions with the investigation unit, must then take measures to remedy the situation, presenting a serious and imminent danger.

## 5.5. Decisions on further action

---

After the Investigation Unit has analyzed the report, the employer decides what action to take on the serious and imminent danger alert:

- If agreement on the reality of the serious danger and its imminence: end of alert procedure and implementation of measures.
- If there is disagreement over the reality of the serious danger and its imminence: emergency meeting of the CSE within 24 hours, informing the labor inspectorate and CARSAT/CRAMIF of the meeting and the reason for it.
- Following the exceptional meeting of the CSE :
  - If there is agreement that the danger is real and imminent: end of alert procedure and implementation of measures.
  - If disagreement: the employer refers the matter to the Labour Inspectorate, who can draw up a report noting the company's infringements, implement a formal notice procedure or refer the matter to the court, since only the court can ultimately rule on the reality of the serious and imminent danger.

## 6. Personal Data

---

The information collected as part of this alert procedure is processed for the purpose of collecting and processing alerts in the above-mentioned areas. In accordance with the amended French Data

Protection Act of January 6, 1978 and European Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 “on the protection of individuals with regard to the processing of personal data and on the free movement of such data” (RGPD), you may exercise your rights to information, access, rectification, deletion and opposition to the processing of your personal data by sending an email to: [ethique@htlbiotech.com](mailto:ethique@htlbiotech.com)

The whistleblowing system records only the personal data received from the whistleblower or required to process the alert, which are generally as follows:

- Identity, contact details and function of the whistleblower(s),
- Identity, position and contact details of persons subject to an alert,
- Identity, job title and contact details of persons involved in receiving or handling the alert, where necessary.
- Facts reported,
- Elements collected as part of the verification of reported facts,
- Report on verification operations, follow-up to alert.

The HTL Group guarantees the confidential treatment of all information transmitted to it via this system

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

The identity of whistle-blowers is communicated, if necessary, within the company only to those persons who need to know it for the purposes of verifying or processing the alert and its consequences, and only after they have signed a specific confidentiality undertaking. The identity of whistle-blowers is never communicated to the persons concerned by the alert.

Except for the cases mentioned above, elements that could identify the whistleblower cannot be disclosed without the person's consent, unless required by judicial authorities or to meet a legal obligation. Similarly, elements that could identify the person implicated by a report cannot be disclosed, unless required by judicial authorities or to meet a legal obligation, only once the validity of the report has been established.

The collected data will be kept only for the duration necessary to process the case under review. They will be destroyed as soon as their retention is no longer legally required (in particular, depending on the duration of a disciplinary or legal procedure), or, when technically feasible, stored anonymously (i.e., by neutralizing personal data within the retained data). Personal data collected during this whistleblowing procedure will be:

- **Erased within 2 months** after the investigation is concluded, if the facts are not proven to be true or if it is decided not to initiate any disciplinary or legal action, or
- **Retained until the end of disciplinary or legal procedures, then archived** in compliance with applicable legal provisions, if the facts are proven to be true, or
- **Retained at the discretion of the HTL Group, for anonymized data.**

## 7. Appendix – Instructions for use

---

### To submit a new report :

1. **Go to the homepage** of the website.
2. **Click on the "Submit an alert"** button prominently displayed on the homepage.



3. You will be redirected to the report form. **Complete the required fields**, providing the requested information clearly and accurately.
4. Validate your report by clicking the "**Submit**" button to send it to the relevant team
5. Select the country where **the incident occurred**

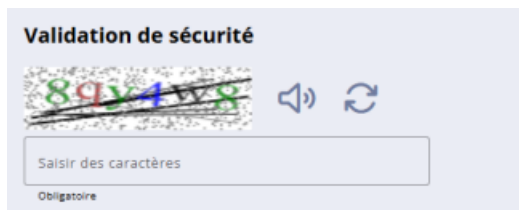
6. **Fill** out the questionnaire.
7. The Microphone icon allows the Whistleblower to **record their voice**, which will then be distorted by the platform. The Whistleblower cannot be identified, and their **anonymity is protected**.



8. The Paperclip icon allows the Whistleblower to attach documents. Any type of document can be attached, with a maximum file size of 100 MB per file. **The Whistleblower** can attach up to 5 files.



9. Only on mobile devices: The Camera icon allows the Whistleblower to take a photo.
10. In the "**Contact Information**" section, the Whistleblower can choose to remain anonymous or provide their name, phone number, and email address.
11. The secure mailbox must be created to allow safe and easy communication between the Whistleblower and the Case Manager. To create the secure mailbox, the Whistleblower must enter a password and check the box to accept the privacy policy. A case number will then be generated. **It is very important for the Whistleblower to remember their password and identification number to access their secure mailbox. If forgotten, the Whistleblower must submit a new report.**
12. A **security validation** (captcha) will appear. The Whistleblower must enter the characters (letters and numbers) displayed. If necessary, the captcha can be listened to or a new captcha can be generated.



13. The secure mailbox allows the Whistleblower to be in contact with the Case Manager and receive all necessary information for processing.

Boîte postale sécurisée