

Whistleblowing Policy: Reporting and Investigation Procedure

Prodware intends to conduct its activities with integrity and ethics and wishes to ensure that all its employees and partners have the opportunity to report any breach or irregularity in accordance with the provisions described below.

This document defines the procedure for implementing the system and handling reports in accordance with the applicable legal provisions.

1. What is a whistleblowing system?

It enables the persons referred to in section 3 to report, in good faith and without direct financial consideration, facts or information concerning:

- A threat or harm to the public interest;
- A breach of a law, regulation or European Union law, and any attempt to conceal that breach. It may also involve a breach of an international commitment, such as an international convention;
- A crime or offence.

The system therefore makes it possible to report serious matters arising, specifically, in the following areas:

- Corruption and competition;
- Health, hygiene and safety at work;
- Environmental protection;
- Protection of privacy, personal data and information systems security...

This list is not exhaustive.

Note: The internal whistleblowing system is optional, not mandatory.

It is not intended to replace the usual internal communication channels, in particular management reporting lines, Human Resources departments and employee representative bodies.

These people are your preferred points of contact and are able to help and advise you on the appropriate course of action if a situation raises concerns.

2. What matters are covered?

To be admissible, a report must be made by a natural person acting in good faith and without direct financial consideration.

It must concern serious matters that have occurred or for which there is a strong likelihood that they will occur.

3. Who can be a whistleblower?

The system is open to:

- Members of staff and people who have applied for employment; External and/or occasional workers (trainees, temporary workers, etc.);
- Contracting parties and subcontractors, etc.

Reports may be made in the whistleblower's name or anonymously. To facilitate the analysis and handling of reports, named reporting is preferred.

4. Protection of the whistleblower

When these criteria are met, the whistleblower benefits from safeguards:

- They may not be dismissed, sanctioned, discriminated against or subjected to retaliation as a result of the report.
- Under certain conditions, they benefit from immunity from criminal and civil liability and will not be required to answer for any harm caused. This protection may be extended to third-party facilitators.

Conversely, a whistleblower may also be prosecuted for making a false report or for knowingly making a malicious accusation.

5. What safeguards apply when making a report?

All data collected under this whistleblowing system will be treated confidentially, including:

- The identity of the person making the report;
- The facts that are the subject of the report;
- The identity of the persons named in the report.

6. How can a report be submitted internally?

You may choose from several options:

- Contact your usual internal points of contact: your line manager, the Human Resources Manager or the Managing Director.
These people are your preferred points of contact and are able to help and advise you on the course of action to take in order to comply with the Group Code of Conduct or this procedure.
- If you are unable or do not wish to contact these people, you may:
 - **Contact the Group Ethics Officer directly:** Cyrille Duvivier, Group Compliance Officer, using the dedicated email address: compliance@prodwaregroup.com
 - Or use the secure Whistleblower Software platform: **Prodware Group Reporting System** [Prodware Group Dispositif de signalement | Accueil](#)

Whistleblower is a secure, multilingual reporting system supplied by an external service provider. It enables the Ethics Committee to be informed of potential breaches so that it can process reports, investigate and bring any breaches to an end.

Whistleblower Software by Formalize is specialised software hosted in the EU that meets the security requirements imposed by regulations. The platform guarantees the strict confidentiality of your identity, the facts reported and the identity of the persons concerned. You may also choose to remain anonymous.

You will be informed that your report has been received and of the stages in its handling. For this purpose, you will receive a reference number that will also allow you to communicate through the platform.

7. How is the report handled?

Reports will be received only by the designated Officers and the Ethics Committee, which consists of three members. The process can be summarised as follows:

- Acknowledgement of receipt within 7 days;
- Admissibility assessment;
- Internal investigation and collection of factual evidence;
- Conclusion, corrective measures and disciplinary action where appropriate;
- Information provided to the whistleblower within a reasonable period not exceeding 3 months from the acknowledgement of receipt. This period may be extended slightly in complex cases, in which case the whistleblower will be informed;
- Closure and secure archiving of the information.

8. Retention of personal data

Reports of Whistleblowing that fall within the scope of the system but do not result in disciplinary or legal proceedings will be closed without further action, and all data collected will be archived anonymously.

If disciplinary or legal proceedings are initiated following a report, the data will be retained until the proceedings have ended and will then be archived anonymously for a period consistent with the retention periods established by the applicable legislation.

9. General information for whistleblowers

This procedure is available on the Group's website. In addition to the internal channel, the whistleblower may use the external channels authorised by law in their country.