



Collecting and processing whistleblowing reports by the LOXAM Group



*If you have any questions about this document, you can contact the PAD Ethics Officer
and the Legal Department*

The Loxam Group wants to enhance its ethics commitments and give its employees and stakeholders the ability to **easily and confidentially report any failure to comply** with the Group's values, applicable laws or regulations **so that it may be resolved**.

This whistleblowing system **supplements the existing channels** within the Loxam Group such as the ability to reach out to your manager, your human resources manager or, for external stakeholders, their usual contact. It is an option provided to employees and stakeholders and **nobody is required to use this system**, nor may they be sanctioned for not using it.

The whistleblowing system gives everyone the opportunity to help prevent harm to other people or to the Loxam Group and to **help improve the policies and practices** within the Group.

This procedure describes the system and the **confidentiality and protection measures** to which whistleblowers and their entourage are entitled. It **replaces the previous procedure** in force within the Loxam Group.

1. Who can make a report?

Any:

- ✓ employee
- ✓ former employee
- ✓ applicant for a job
- ✓ external and occasional collaborator
- ✓ Customer, supplier and subcontractor

can submit a report.

- If the information disclosed by the whistleblower was obtained in the course of their **work**, the whistleblower is not required to have personal knowledge of it, so long as they believe in the truthfulness of the information given.
- However, if the information disclosed by the whistleblower was not obtained in the course of their work, the whistleblower must have **personal knowledge** of it.

The whistleblower must act in **good faith**.

The whistleblower must act **without expectation of direct financial compensation**.

2. What concerns can be raised in a report?

A report can be made about:

- ✓ a **crime** or **misdemeanour**
- ✓ a threat or harm to **public interest**
- ✓ a **violation** or attempt to conceal a violation:
 - of an international commitment duly ratified or approved
 - of a unilateral act made by an international organisation based on such a commitment
 - of European Union law
 - of a **law** or **regulation**
- ✓ a situation that **contravenes** the Loxam Group's **Ethics Charter**

For example, a report can be made about breaches of:

- accounting and financial rules
- anti-corruption rules
- personal safety rules
- competition law
- environmental law
- intellectual property law
- human rights and fundamental freedoms
- personal data protection rules
- the rights and protections of persons: discrimination, mental or physical harassment, forced labour, violation of trade union rights

NB: information covered by national security, **medical privacy**, confidentiality of judicial deliberations, **confidentiality of investigations or inquiries** or **lawyer-client** privilege cannot be disclosed.

The whistleblower must **objectively** report the facts providing, as far as possible, any information or document that supports their report.

3. How do you make a report?

All reports must be made via the independent online platform **LOXAM SPEAK UP** :

<https://loxamspeakup.integrityline.com>



Using this platform ensures a **high level of security and confidentiality** for the dialogue between the whistleblower and the PAD Ethics Officer.

Via this secure platform, the whistleblower **makes their report by filling out an online form** that, via a series of questions, enables them to **provide all the necessary information**, including any documents supporting their disclosure. You can make a report using any device (smartphone, tablet or PC).

The platform enables the whistleblower to make **anonymous reports if they so wish**.

The whistleblower can also **access all the information needed to follow-up on their report**. As such, an identification number is generated when the report is submitted. The whistleblower must keep this identification number and the password they choose. For security reasons, this information cannot be retrieved if it is lost and the whistleblower will have to submit a new report.

NB: **public disclosures**, especially to the press or via social media, are only possible **if the report is not processed within three months**, in the event of serious and imminent danger to public interest or if referral to the competent authority would lead to a risk of retaliation or if this referral would not remedy the concern raised in the report (e.g. in the event of conflict of interest).

4. What happens after you speak up?

The PAD Ethics Officer is automatically alerted as soon as a report is made on the platform. They then go to the platform to read the report.

Within seven days following the report, **the PAD Ethics Officer sends acknowledgement of receipt to the whistleblower.** They conduct a preliminary analysis to assess the report's admissibility and, as such, can ask the whistleblower for any additional information they need.

- If the report is not admissible because it falls outside the scope of this system, the PAD Ethics Officer informs the whistleblower and ensures the data related to this report is destroyed immediately.
- If the report is admissible **the PAD Ethics Officer investigates it, in collaboration with the Ethics Committee, taking all necessary action** (legal and technical analysis of the facts, collecting any information or documents of use to their analysis, discussions with the various stakeholders, expert examinations).

In this respect, the PAD Ethics Officer may call on an **assessment team made up of a limited number of people** selected from the competent Loxam Group departments depending on the severity of the facts disclosed and the people involved. All the members of this assessment team are bound by a **strict obligation of confidentiality**, impartiality and transparency.

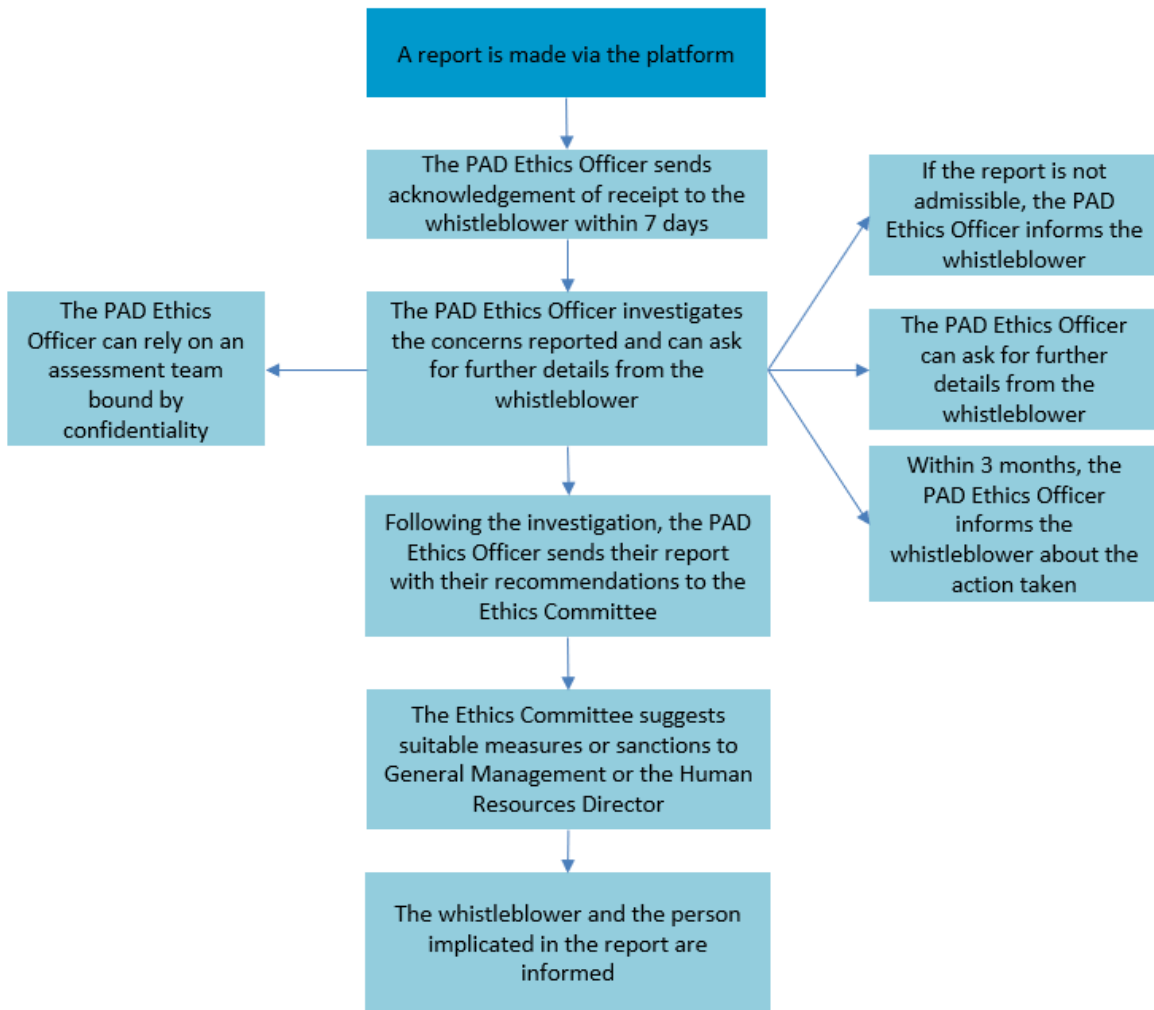
In the three months following the report, the PAD Ethics Officer **informs the whistleblower about the measures planned or taken** to assess the accuracy of the allegations and, where relevant, to resolve the subject of the report.

Once the investigation is complete, the PAD Ethics Officer closes the investigation and informs the whistleblower and the person(s) implicated in the report that it has been closed.

The PAD Ethics Officer establishes a report outlining their recommendations that they send to the Ethics Committee. The Committee rules on the information submitted for analysis and the recommendations and **suggests to General Management** or, depending on the case, to the Human Resources Director **measures it believes are appropriate and proportionate** to the failure observed. The whistleblower is informed.

Illustration of how an investigation is conducted

Once a report has been made on the online platform, the analysis and investigation procedure is as follows:



NB: For anonymous disclosures, the PAD Ethics Officer is not required to inform the whistleblower about the measures taken after they reported their concern.

5. How is the whistleblower and their entourage protected?

➤ **Non-retaliation**

Any whistleblower who reports a concern in line with this procedure **may not be sanctioned, fired, nor subject to a direct or indirect discriminatory measure**, in particular in terms of remuneration, training, promotion, working hours, performance appraisal, transfer or contract renewal.

If a report is submitted to the platform anonymously and the identity of the whistleblower is revealed later, they will benefit from all the protective measures described above.

The **whistleblower's entourage** also benefits from protection against retaliation. Their entourage is the following people:

- ✓ any **physical person, association or trade union that helps the whistleblower** with their report
- ✓ any physical person, in connection with the whistleblower, who could be subject to retaliation by their employer or customer
- ✓ the entities controlled by the whistleblower for which they work

If the information reported by the whistleblower is found to be inexact, the whistleblower **may not be prosecuted or sanctioned**.

NB: If the whistleblower acted in bad faith, making allegations that he or she knew were false or slanderous, they may be subject to disciplinary sanctions and potentially legal prosecution.

➤ Confidentiality and personal data protection

Specific measures are taken to protect the **confidentiality** and identity of the whistleblower and data security:

- **only authorized persons** (PAD Ethics Officer, assessment team if necessary, Ethics Committee) have access to data that can be used to identify the whistleblower
- under no circumstances is this data given to the person implicated in the report
- the data collected by the whistleblowing system can be shared, solely for the purposes of the investigation, with the appointed experts who are also contractually bound to confidentiality and legal authority

Regarding **data retention**:

- only information relevant and necessary to process the report is collected and/or retained in the whistleblowing system
- for reports that are not admissible, the data collected is destroyed or archived after being anonymised as soon as possible
- for **admissible reports**:
 - if no legal or disciplinary action is taken, the data about the whistleblower and any person implicated in the report is destroyed within **two months**
 - if legal or disciplinary action is taken, the data is retained until the statute of limitations expires

The whistleblower has the right to access, correct and delete their data by addressing the PAD Ethics Officer who will handle the request in collaboration with the Data Protection Officer (DPO).

Under no circumstances may the person implicated in the report **obtain information about the whistleblower's identity**, on the basis of their right to access their personal data.

Furthermore, information that would identify the person implicated in the report cannot be disclosed, except to legal authorities, until the accuracy of the report has been established.

*Employees and stakeholders who do not have IT tools or smartphones allowing them to access **Loxam Speak Up** can make a report by calling the PAD Ethics Officer on **(+44) 330.174.4451**.*