



# Policy for collecting and processing internal alerts

ATALIAN GLOBAL SERVICES

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Approval: General Secretary

Effective date : March 2024

In accordance with the provisions of the Sapin II law, the Wasserman law and its implementing decree, ATALIAN Group has an ethical whistleblowing system that is common to all of the Group entities. It enables any person to report a breach of the Code of Conduct or applicable laws and regulations.

The Group Compliance department has developed a robust compliance programme, which it is responsible for rolling out with the support of all top management.

Relays of this organisation are designated within each subsidiary. These are:

- Firstly, directors of Group subsidiaries, acting within the framework of their delegation as guarantors of compliance with the ATALIAN Group Code of Conduct in their countries, in compliance with local laws;
- Secondly, local Compliance Officers in each country and in France, responsible at the level of their entity for the local operational deployment of the compliance programme. The list of compliance officers is available on Atalink in the "Compliance" section.

The local Compliance Officers support the operational team by answering any questions relating to business ethics and compliance. Upon receiving an alert, they immediately inform through the use of the One Trust platform, the Group Compliance Department, which assesses its admissibility and decides how to handle the alert, which can be done internally or externally.

All ATALIAN employees can report possible violations and other concerns regarding the ATALIAN Group Code of Conduct and ask for advice if in doubt as to the appropriate conduct.

This document describes the Policy for receiving and processing ethics alerts received internally via the ATALIAN Group's ethics alert system or via the various persons designated for this purpose.

## PERIMETER

The whistleblowing system covers alerts relating to the following breaches and infringements:

Breaches relating to the violation of the Code of Conduct that may be described as acts of corruption or influence peddling, or that constitute:

- A crime or misdemeanour;
- A serious and obvious violation of an international commitment duly ratified or approved by France;
- A serious and obvious violation of a unilateral act of an international organisation taken on the basis of a duly ratified international commitment;
- A serious and obvious violation of the law or regulations;

A threat or serious harm to the public interest.

### 1. How do I raise an alert?

Alerts can be submitted by logging on to the dedicated website accessible at <https://en.ethicslineatalian.com>.

Any whistleblower can choose to remain anonymous when submitting the alert.

Your alert can also be sent to one of these people who will contact the Group Compliance Department:

- Your line manager;
- Your Local Compliance Officer (in your country or in France);
- Your Human Resources department.

The oral alert will then be transcribed in writing either at a meeting organised within 20 working days from the date of launch of the local alert or through the link mentioned above.

This transcript must describe the alleged facts as well as any documents or data, whatever their form or medium, that could potentially support the reported facts.

Whatever channel is used, the confidentiality of your alert is guaranteed. The alert cannot give rise to any remuneration or gratuity: it is strictly disinterested.

## 2. Who can raise an alert?

Any current or former employee of the ATALIAN Group can use the whistleblowing system.

This right of alert is also open to:

- External, permanent or occasional employees (for example, temporary staff, interns, the personnel of a subcontracting company or service provider), former employees of the ATALIAN Group, when the information was obtained in connection with this relationship;
- Candidates for employment within the ATALIAN Group, when the information has been obtained in connection with this application;
- Any other ATALIAN Group stakeholder such as its co-contractors, subcontractors, etc.

It is not necessary to have had personal knowledge of the facts reported in the alert if you came to learn of them in the course of your professional activity.

Any issued alert must be factual and as complete as possible. The whistleblower can rely on the following questions:

- What happened?
- When did it happen?
- Who is or has been involved?
- Are the facts continuing?
- What is the degree of risk or urgency of the situation?
- How did the whistleblower become aware of the facts?
- Are there any witnesses or others involved in the situation?

If the whistleblower has documents or any other evidence, he/she must make this known and upload this information to the platform.

### 3. Who receives the alert?

Whichever channel - or person - you have chosen for submitting your alert, it is sent to the Group Compliance Department for a decision with regard to how it will be handled.

### 4. How is your alert handled?

#### Acknowledgement of receipt

An acknowledgement of receipt is sent within seven working days of receipt of your alert.

The acknowledgement of receipt confirms that the alert has been received. Additional documents or items for the handling of your alert may be requested.

This acknowledgement of receipt marks the start of the three-month period for examining an alert's admissibility and, if found to be admissible, its substance.

#### Handling of your alert

If your alert falls within the scope defined by law, it is handled with rigour, impartiality, objectivity and in compliance with applicable laws, notably labour law and the protection of personal data (see Appendix "Protection of Personal Data"). It is followed by a thorough analysis to determine whether the facts alleged in the ethics alert can be established and proven.

This phase involves interviews with the persons involved or anyone who may have information, collection of documents and information and, if necessary, the conduct of an internal investigation.

This may be carried out, in whole or in part, internally or with the support of external service providers under the strictest conditions of confidentiality. Its purpose is to establish the materiality of the facts alleged by the ethics alert.

The Group Compliance Department may notably involve the hierarchy (if it is not the subject of the alert) or any knowledgeable person, internal or external, whose intervention seems necessary in the context of the verification or handling of the alert, in strict compliance with confidentiality obligations.

During the internal investigation, personal data may be collected directly or indirectly from data subjects.

Upon completion of the internal investigation, an internal investigation report is drafted which can either conclude that:

- the alleged facts are proven; or
- that the facts alleged are inaccurate; or
- that it has not been possible to verify them (for example, due to lack of physical evidence).

The governing body is kept informed of the results of internal investigations. Disciplinary measures may be applied, up to and including dismissal. Any dismissal decision is validated by the Group HR Department according to the applicable HR procedures, and the Group Compliance Department is informed.

When alerts involve employees in the countries in which the ATALIAN Group is established, the Group Compliance Department is informed by the local Compliance Officer of the disciplinary sanctions pronounced locally and keeps track of the application of these sanctions.

The alert is then closed. The whistleblower is kept informed of this closure.

When the alleged facts are proven, the Secretary General and the Group HR Department decide on possible consequences, such as disciplinary sanctions against the persons who committed or participated in the unlawful acts, as well as, if necessary, referral to the administrative or judicial authorities. The collected personal data are retained in an intermediate archive until the end of the contentious procedures and the expiry of any legal remedies.

When the alleged facts are not proven or have been impossible to verify, the personal data allowing the identification of the whistleblower and the targeted person(s) are destroyed within two months from the closure of the alert.

#### Confidentiality guarantee

Throughout the alert handling stages, the recipient of the alert takes all necessary measures to preserve the security and confidentiality of the data, during their collection, processing and storage.

The data and elements provided by the whistleblower are kept on the One Trust platform.

Reports are collected and processed (notably as part of the collection of documents and the conduct of interviews) in such a way as to guarantee strict confidentiality:

- of the identity of the whistleblower;
- of the identity of the persons referred to in the report;

- of the information collected as part of the report.

Elements that could possibly identify the whistleblower may not be disclosed, except to judicial authorities, without this person's consent.

#### Whistleblower protection

Protection only applies to the whistleblower who has acted in good faith and without direct financial compensation, on the basis of the information on the scope described above.

ATALIAN Group prohibits any form of retaliation or discrimination against an employee who has, in good faith, expressed concern about a potential violation and reported facts in accordance with the Policy, even if the facts subsequently prove to be inaccurate or do not give rise to any action.

Anyone, regardless of their position within the Group, who retaliates against a whistleblower may be subject to disciplinary sanctions up to and including dismissal.

Under penalty of sanctions, the whistleblowing system may not be misused by a whistleblower for the purpose of personal denigration.

It is expressly prohibited for any ATALIAN Group employee to dismiss, demote, lay off, threaten, harass, or otherwise discriminate against any person for making a report in good faith or participating in the investigation of such a report.

Any person who has taken retaliatory action against a person who has made a report or participated in good faith in an investigation may be subject to disciplinary measures up to and including dismissal.

ATALIAN Group reserves the right to take disciplinary measures against any person who violates this Policy by knowingly making a false or malicious statement against another person with the intention of deceiving or bringing about the opening of an unwarranted investigation.

Any report that, after investigation by the persons in charge of compliance at ATALIAN Group, is found to have been made in bad faith or with intent to harm, or to have been intentionally false, constitutes serious misconduct and may result in disciplinary measures up to and including dismissal, without prejudice to any legal action that may be initiated.

#### Confidentiality

Any report made under this Policy remains confidential and limited to the whistleblowing system. The identity of the whistleblower, the persons concerned by the alert as well as any document received in connection with the said alert are disclosed only to those persons who need to know them in order to conduct an effective investigation, after signing a confidentiality agreement.

Every effort must be made to strictly limit the number of people who are aware of this information. All persons involved in the investigation will be informed of the importance of the confidential nature of the procedure.

Unauthorised disclosure of the said information may result in disciplinary sanctions. ATALIAN reserves the right to disclose the identity of a whistleblower if the circumstances surrounding a report must be conveyed to an authority.

## 5. As a manager

Employees must be actively encouraged to report their concerns in order to allow reporting and to put an end to any breach of the ATALIAN Group principles and values.

If an employee turns to you with a concern or problem, you should:

- listen to him/her with respect and consider his/her words seriously, even if you disagree or think that the report is inaccurate or exaggerated.
- ensure the confidentiality of the identity of the person reporting the issue.
- take special care to ensure that the employee does not suffer any retaliation for having made a report.
- promptly inform the Group Compliance Department of the report and do not attempt to carry out the investigation yourself, as this requires specific skills.

*Do you have questions or need information about this Policy? Contact your manager, the General Secretariat or the Group Compliance Department. They are there to assist and guide you.*

## APPENDIX 1 - Processing of personal data by the whistleblowing system

As a data controller, the ATALIAN Group may be required to process personal data in connection with the handling of ethics alerts received internally through one of the available channels described in this Policy, and when conducting internal investigations.

The legal basis for this processing is the performance of the ATALIAN Group's legal obligation under the Sapin II law.

The processing is carried out in order to:

- Collect and handle ethics alerts as defined by applicable law and regulations, and by this Policy;
- Perform the necessary verifications, investigations and analyses;
- Decide on the follow-up to be given to the ethics alert;
- Ensure the protection of data subjects;
- Exercise or defend legal rights.

Persons whose personal data are collected directly or indirectly in connection with the handling of an ethics alert are informed of the processing of their data, unless there is a risk of evidence being lost. They will then not receive the information until this risk disappears.

The processing of special categories of personal data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, which concern the health, sexual life or sexual orientation of a natural person or biometric data is permitted in the context of the processing of an ethics alert, in strict compliance with the principles of minimization and relevance.

Only the persons responsible for processing the alert and verifying the alleged facts have access to the personal data collected directly or indirectly.

When the ethics alert is found to be inadmissible, the personal data collected on this occasion are deleted without delay so as to prevent the identification of the whistleblower or the targeted person.

When the ethics alert is found to be admissible but the internal investigation concludes that the alleged facts are not proven or that it is not possible to verify them with certainty, the alert is closed and the data collected on this occasion are destroyed after a period of 2 months from the closure of the alert.

When the internal investigation has made it possible to establish the substance of the alleged facts, with a judicial or disciplinary action then being envisaged, the collected and processed personal data are retained in an intermediate archiving database for the duration of the limitation period of the envisaged actions and the remedies against them.

Individuals whose personal data have been collected during the processing of an ethics alert have rights of access, rectification, limitation or deletion that they can exercise by contacting the ATALIAN Group Data Protection Officer at [dpo@atalianworld.com](mailto:dpo@atalianworld.com).



## APPENDIX 2 - Alert Line Access Telephone Numbers

Country		Telephone number:
	Poland	00.800.141.0213
	Bosnia	08.008.3038
	Croatia	(0800)-806-520
	Hungary	+36212111440
	Romania	0.800.360.228
	Czech Republic	800.701.383
	Serbia	0800-190-167
	Slovakia	0.800.002.487
	Turkey	850 390 2109
	Luxembourg	800 27 311 352 20 20 24 08
	Netherlands	+31 0.800.022.0441
	Belgium	080 026 039
	Russia	8.800.100.9615
	Belarus	8-820-0011-0404
	Mauritius	802 049 0005
	Lebanon	(01-426-801) 855-8659-450
	France	0805-080339