



Whistleblower protection policy

1 Document owner and version history

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History :

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2 Introduction

The Gantrex Group (HF Holding and affiliated companies, hereinafter referred to as "the company") offers anyone who is aware of or has reasonable grounds to suspect a violation in the context of the company's activities the opportunity to report it confidentially and anonymously.

This policy defines and informs employees (salaried staff, volunteers, candidates and trainees) and all other potential and actual stakeholders (consultants, subcontractors, partners, suppliers, shareholders, directors, etc.), hereinafter referred to as "whistleblowers", about the management of internal whistleblowing within the company, the internal whistleblowing tools available and the rules for protecting whistleblowers.

This policy is adopted in application of Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and in application of laws made at national level on this subject.

This policy has been adopted following consultation with the relevant bodies within the company.

3 Role and responsibility

Several people have been authorised and designated to receive, monitor and manage internal whistleblowing, hereinafter referred to as the "Whistleblower Officer". Whistleblower Officers are employees of the Gantrex Group, but are not considered to be part of the company's top management in order to avoid any conflict of interest.

Whistleblower Officers handle alerts impartially and in strict independence, with no right of review by line management.

Whistleblowers Officers and all those involved in the investigation and follow-up actions are bound by an obligation of confidentiality.

4 Scope

This policy applies to reports of potential breaches in the following areas:

- Criminal offence
- public contracts;
- financial services, products and markets and the prevention of money laundering and terrorist financing;
- product safety and conformity;
- road safety and transport safety (road, rail, sea, air, etc.);
- environmental protection;
- radiation protection and nuclear safety;
- public health;
- consumer protection;

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- tax fraud ;
- social fraud ;
- financial interest of the European Union, internal market (including competition and state aid infringements).

The Gantrex Group extends the possibility of internal reporting to the following subjects:

- violation of the Code of Conduct and Policies issued by the company

If you wish to report a breach of privacy, personal data protection or network and information systems security, please refer to the Privacy policies and procedures issued by Gantrex.

If there is any doubt as to whether an alert falls within the scope of this policy, it is recommended that the alert is nevertheless handled internally, following the procedure outlined in point 6. All alerts will be subject to an initial assessment to ensure that they fall within the scope described in point 4. The whistleblower will be informed of the outcome of this initial assessment. If the alert is not covered by this policy and if the whistleblower does not object within 7 days of receiving the informative e-mail, the alert will be not further investigated.

5 Whistleblower protection

5.1 Conditions to be met by the whistleblower

The Whistleblowers benefit from the protection offered by law provided that :

1. They had reasonable grounds to believe that the information reported on the violations was true at the time of reporting, and
2. They had communicated information that falls within the scope of this policy (point 4);
3. They had reported the matter in accordance with the procedure set out in point 6 or any other procedure provided for by law.

5.2 Protection provided by the company

The following protection measures have been put in place:

- ✓ Confidential identity or anonymity of the whistleblower ;
- ✓ The absence of reprisals against the whistleblower and those associated with him or her;
- ✓ Support measures.

Confidentiality and anonymity

In accordance with legal provisions, the identity of the whistleblower will be treated as confidential throughout the procedure, i.e. it will not be disclosed to persons other than those authorised and listed in point 3, unless required by law or with the whistleblower's consent.

As well as being protected by confidentiality, whistleblowers have the option of making an anonymous report and not disclosing their identity throughout the procedure.

Despite carrying out a scrupulous and reasonable analysis of the company, it may happen that the choice of anonymity when reporting limits the investigation and the actions to be taken.

No retaliation

The whistleblower and those close to him or her (carer, family, etc.) may not be subjected to retaliation as a result of the report.

Unless they are duly justified, acts of retaliation, for example, constitute :

- a dismissal ;
- a suspension ;
- a reduction in salary ;
- a refusal to renew a contract ;

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- demotion or refusal to promote ;
- a change in working hours or place of work ;
- a transfer of functions ;
- suspension of training ;
- unfavourable assessments ;
- refusal to grant leave ;
- creating an uncomfortable environment;
- disciplinary measures, reprimands or any other sanctions ;
- harassment ;
- discrimination ;
- intimidation ;
- damage to reputation ;
- assaults intended to punish or deter further cooperation with an ongoing investigation, audit or other form of enquiry;
- early termination of a contract for the supply of goods or services;
- etc.

Support measures

The following support measures may, where appropriate, be put in place by the company:

- technical advice to any authority concerned by whistleblower protection;
- technical, psychological, social or media support measures.

6 Internal notification procedure

6.1 Entering a notification

Whistleblowers who are aware of or have reasonable grounds to suspect a violation in the context of the company's activities are invited to report it directly via the internal whistleblowing notification platform accessible via the following link: <https://gantrex.notificationchannel.eu/>

Whistleblowers use the form provided on the internal whistleblowing platform to communicate facts, information and useful documents, in any form or on any medium whatsoever.

It is advisable to give as many details as possible (the company(ies) concerned, dates and attachments) to facilitate the investigation.

The platform ensures anonymity, but whistleblowers may, if they wish, disclose their identity by entering it in the "description" section of the form.

The identity of the whistleblower and any information likely to identify him or her will be treated in the strictest confidence.

The whistleblower must act in good faith and the whistleblowing must be based on reasonable grounds. In the event of improper or bad faith whistleblowing (e.g. defamation or harm caused to others), the whistleblower may be subject to disciplinary and/or criminal sanctions.

It is forbidden to obstruct a report under penalty of disciplinary and/or criminal sanctions.

6.2 Notification follow-up

Once the notification has been entered, the whistleblower will receive a **16-digit tracking number, which must be kept** and re-entered each time the whistleblower logs on to the platform, so that the whistleblower can check the status of his or her request and talk to the Whistleblower Officer in charge of managing the alert. If this tracking number is forgotten, it cannot be recovered. It is therefore important that whistleblowers note down or remember this tracking number.

The whistleblower is not notified by e-mail. **All follow-up is carried out via the internal reporting platform.** Whistleblowers are therefore invited to consult the internal whistleblowing platform on a regular basis, using their tracking number, in order to be informed of the action taken on their report.

Once the report has been sent to the appropriate person, the following procedure will be followed:

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- An acknowledgement of receipt of the alert is sent to the whistleblower, via the platform, within 7 days of receipt of the alert.
- Whistleblower Officer assesses the admissibility of the alert as described in point 4.
- If the report is admissible, i.e. if it falls within the scope of this policy, the Whistleblower Officer will conduct an independent investigation. He has the widest powers of access to information. In the event of a conflict of interest or in complex cases, the Whistleblower Officer may outsource the management of the alert to any competent person.
- At the end of the investigation, a report is sent to the Executive Board so that appropriate action can be taken. In the event of a conflict of interest at Executive Management level, the matter is referred to the Board of Directors. In the event of a conflict of interest at board level, the next step in the investigation is determined by the Whistleblower Officer, assisted by an external legal advisor.
- Whistleblowers receive a follow-up via the platform informing them of the final outcome of the investigation carried out, the measures decided and taken by the competent body and the reasons for the final decision. The follow-up is carried out within 3 months of the acknowledgement of receipt at the latest (or within 6 months in duly justified cases).

6.3 Archiving alerts

Alerts and any related information will be kept in a specific file on the company's server (with limited and secure access) in compliance with confidentiality requirements.

7 External reporting and public disclosure

In addition to the possibility of reporting internally as set out in point 6, the whistleblower also has the option of reporting via an external channel or by public disclosure.

The company encourages whistleblowers to first follow the internal whistleblowing procedure in place before resorting to external whistleblowing, in order to encourage the adoption of solutions within the company itself.

To make an external report, whistleblowers must contact the relevant authorities, depending on the country:

Belgium:

- to the Federal Ombudsman via the following link:
<https://www.federaalombudsman.be/fr/lanceurs-dalerte/signalez-une-atteinte-a-lintegrite-ou-une-violation-de-la-legislation> ;
- to the authorities declared competent by Royal Decree, in accordance with the procedure established by each authority. Further information is available on the website of each competent authority.

France:

- to the authorities declared competent by decree no. 2022-1284, in accordance with the procedure established by each authority. Further information is available on the website of each competent authority.

Spain:

- Autoridad Independiente de Protección del Informante, A.A.I.

Germany:

- Externen Meldestelle des Bundes via the following link:
<https://formulare.bfj.bund.de/ffw/form/display.do?%24context=6890B5D90D91D3C45CBD> ;
- to the authorities declared competent under the Gesetz für einen besseren Schutz hinweisgebender Personen (Hinweisgeberschutzgesetz - HinSchG) and in accordance with the procedure established by each authority. Further information is available on the website of each of the competent authorities.

8 Data processing

Any processing of personal data following a report will be carried out in accordance with the confidentiality policies established by the company.

Gantrex Policies are available in the Teams > All Company > Policies & Procedures group.

9 Policy updates

The company reserves the right to amend this policy unilaterally and at any time. The most recent version of the whistleblowing policy will always be available on the Teams > All Company > Policies & Procedures group, as well as on the internal whistleblowing platform and on the company website.

10 Assistance

If you have any questions about this policy, please contact the author of the document.