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Whistleblower policy	January 2022	V1	ADIT Group's employees	

ADIT GROUP

WHISTLEBLOWER POLICY

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Preamble

As part of the implementation of its ethical commitments, the ADIT Group has decided to set up a professional alert system as a new tool available to employees, **in addition to traditional communication channels** and in accordance with new legal provisions, to report any breaches of the rules set out in the Ethics Charter and to manage the reports.

Law No.2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life, known as the "Sapin 2" law, requires the implementation of an internal whistleblowing system.

The implementation of this system within the ADIT Group guarantees its compliance with French and European regulatory requirements and, more particularly, with European Regulation EU 2016/679 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 (GDPR – General Data Protection Regulation) and with Law no. 78-17 of 6 January 1978 on data processing, data files and individual liberties - in its most recent version in force, and with the recommendations and decisions of the *Commission Nationale de l'Informatique et des Libertés* (CNIL - French Data Protection Authority).

This procedure describes the scope of the system, how it operates and the guarantees it provides to employees.

I. The scope of application of the alert system

1. Purpose of the procedure

The ADIT Group provides all of its employees with a system for receiving alerts, enabling them to report confidentially and without fear of reprisal any doubts or concerns regarding the application of the law or the principles set out in the Ethics Charter.

This alert system is optional, complementary, and not compulsory.

It is not intended to replace other existing alert channels, in particular **the hierarchical and managerial channels**. Lastly, its use must remain exceptional in view of its scope, as set out below.

This procedure applies to all of the Group's entities and all the companies they control.

Entities of the ADIT Group established in a country other than France must determine whether this procedure must be adapted to comply with their national legislation.

2. The scope of application pertaining to employees

Any employees of the ADIT Group, including external and occasional employees¹, may use the ADIT Group's whistleblowing system.

Alerts relating to breaches of the ADIT Group Ethics Charter are reserved for Group employees only.

In order to benefit from the protection provided for whistleblowers by the law, the whistleblower must:

- report without expecting any direct financial compensation;
- submit alerts in good faith.

Good faith is understood to mean that an alert is made without malice or any expectation of personal gain. Good faith presupposes that the employee can establish or produce data that is formulated in an objective manner, directly related to the scope of the whistleblowing procedure, and strictly necessary to verify the alleged facts.

In this respect, it should be noted that the author of allegations, who knows that the submitted claims are false, cannot be considered to be acting in "good faith" and is liable to prosecution under the law for slanderous accusations (article 222-10 of the French Penal Code).

In contrast, an employee acting in good faith will not be subject to any disciplinary action or prosecution if the alleged facts prove to be inaccurate or do not give rise to any follow-up.

¹ External and occasional employees include trainees and staff on secondment (such as consultants, temporary staff or subcontractors).

3. The material scope of application

Subject to the admissibility conditions, the system is strictly limited to information relating to:

- a crime or misdemeanour (harassment, corruption, discrimination, etc.) ;
- a violation or attempted concealment of a violation of international or European Union law, statute or regulation;
- a serious threat or prejudice to the general interest ;
- a breach of the provisions of the ADIT Group's Ethics Charter.

In accordance with legal provisions, this procedure does not apply to facts, information or documents, whatever their form or medium, covered by (i) national defense confidentiality, (ii) medical confidentiality, (iii) investigative confidentiality or (iv) lawyer-client confidentiality.

4. The communication modalities of the present procedure

This procedure can be consulted:

- On the ADIT Group website;
- Through the Representative appointed by the ADIT Group.

It should also be noted that this procedure:

- Was sent by e-mail to all Group employees in post when the ethics alert system was launched;
- Is included in the file given to all newcomers.

II. Issuance of alerts

1. The issuance modalities of the alerts

Alerts are sent to the following e-mail address: adit@alertethic.com

Alerts are sent in French or English.

This channel remains a complementary and alternative means of reporting and does not replace the traditional hierarchical channel.

2. The receipt of the alerts

An acknowledgement of receipt will be sent to the author of the alert within 72 hours.

Acknowledgement of receipt does not mean that the alert is admissible.

Under the whistleblowing procedure, the author is informed:

- That the alert has been properly received in the form of an acknowledgement of receipt;
- Of the reasonable and foreseeable time required to examine the admissibility of the alert;
- Of the terms and conditions under which the employee will be informed of the action taken in response to the alert (no further action taken, internal investigation, disciplinary action if appropriate);
- Of the time limit for storing the information in relation to the alert;
- Of the confidentiality guarantees implemented to protect the identity of persons submitting an alert.

3. The content of the alerts

The sender of the alert must provide all the facts, information and documents supporting the alert, such as:

- the context, background and reason for the alert;
- the names, dates, places and other useful information;
- any document likely to support the alert.

The issuer of the alert shall provide any information or documents, in whatever form or medium, to support the alert.

It should be noted that only the following data will be taken into account under this whistleblowing system:

- factual, with a direct link to the subject of the alert;

- formulated objectively;
- strictly necessary for the sole purpose of verifying the alleged facts or processing the alert and proportionate to the protection of the interests in question.

4. The protection measures for whistleblowers

The ADIT Group commits to take all necessary measures to protect the identity of the people reporting an alert.

The alert is, in all cases, strictly confidential. The identity and the facts reported, as well as the identity of the persons referred to in the alert, are confidential.

No information concerning the identity of the author of the alert may be disclosed unless the Group is legally required to do so.

The authors of an alert are encouraged to disclose their identity in order to facilitate the processing of the alert.

In accordance with the CNIL guidelines on professional alert systems (DAP), by way of exception, an alert from a person who wishes to remain anonymous will only be processed if the seriousness of the facts mentioned has been established and the factual elements are sufficiently detailed to enable the Group to carry out the necessary verifications for the alert to be processed.

All anonymous reports may be discussed with the person making the report in order to facilitate the verification of the reported facts.

Any retaliation, whether direct or indirect, will not be tolerated and will result in disciplinary action, up to the termination of the employment contract, in accordance with the applicable law.

III. Management process of the alerts

1. The alerts' recipients

The data and information are transmitted by the sender of the alert to the Referent appointed by the ADIT Group, Alexandra HAZIZA, at the following e-mail address: adit@alertethic.com

To this end, the Reporting Officer is bound by a strict obligation of confidentiality.

While maintaining the confidentiality of the identity of the sender of the alert, the Compliance Officer will ensure that, when handling the alert, only the data and information necessary for verifying and handling the alert are communicated.

2. Analysis and processing

Alerts will be handled independently and confidentially, subject to any obligations arising from the law or applicable legal proceedings.

To guarantee the independence and collegiality of decisions pertaining to the management of alerts, the ADIT Group has set up an Ethics Committee comprising the Compliance Officer, the Company Secretary and the Head of Human Resources of the ADIT Group.

The analysis and investigation of the alert will follow a collegial procedure in two stages:

- An initial assessment – The Ethics Committee will carry out a preliminary assessment to determine whether the report falls within the scope of this procedure.

The admissibility of the alert is based on the following criteria:

- Compliance with the principles defined in the scope of application of the alert system defined in points I.2 and I.3 of this procedure;
 - The likelihood of the facts reported;
 - The detailed nature of the facts reported or the evidence provided.
- An investigation – At the end of the admissibility process, and in the event of a positive conclusion, the Ethics Committee would launch an analysis of the facts and takes all the necessary steps to investigate the alerts received.

If necessary, external experts (e.g. lawyers or accountants) may be engaged to assist the Committee in the investigation. They will work in strict confidence.

The whistleblower will only be involved in the investigation process to verify the facts they have reported. The progress of the investigation, its content, its outcome and the resulting report are strictly confidential, including to the whistleblower.

The Committee is also empowered to take any precautionary measures to prevent the destruction or alteration of information that may be useful in carrying out its work.

At the end of the analysis, the Ethics Committee submits a report to the ADIT Group's General Management, which is responsible for determining whether the alert should be closed or, if it is well-founded, what the sanctions and consequences of the alert should be.

Once the alert has been dealt with, the Ethics Officer informs the sender of the alert and, where applicable, the persons concerned, of the closure of the alert.

Any disciplinary measures or legal action will be taken in accordance with the applicable legal provisions.

3. Notification of the targeted people

Every precaution is taken by the ADIT Group to guarantee the strict confidentiality of information likely to identify the persons concerned by an alert (identity, functions, and contact details).

It should be noted that the identity of the person implicated by an alert may only be disclosed, with the exception of the judicial authorities, once its merit has been established.

When recourse to third parties is necessary in order to deal with the alert, the Referent will only disclose information that is strictly necessary and will ensure that the third parties in question commit to strict confidentiality with regard to the information mentioned above.

In order to enable any person concerned by an alert to be informed of the processing of their personal data and to exercise their rights (see point below), the Referent must inform them, within a reasonable period of time not exceeding one month following the issue of the alert, of the facts of which they are accused.

When precautionary measures are necessary, in particular to prevent the destruction of evidence relating to the alert, the person concerned is informed after these measures have been taken.

Under no circumstances the person who is the subject of an alert may obtain, on the basis of their right of access, information concerning the identity of the issuer of the alert.

4. Data retention

In accordance with article 5-1-e) of the RGPD and the CNIL's reference framework for professional alert systems (DAP):

- Data relating to an alert considered out-of-scope is destroyed immediately or made anonymous.
- When no follow-up action is undertaken regarding an alert that falls within the scope of the whistleblowing system, the data relating to the alert is destroyed or made anonymous within two months of the end of the verification operations.

- When disciplinary or litigation proceedings are initiated against a targeted person or against the perpetrator of an abusive alert, the data relating to the alert may be kept until the end of the proceedings, until the statute of limitations has expired (six years) or until all avenues of appeal have been exhausted.

5. Data processing

The data collected via the ADIT Group's alert system is processed² for the purpose of collecting and managing alerts in the aforementioned areas.

The content of the alerts and the documents provided by the author of the alert may contain personal data. Only the following categories of data may be processed:

- identity, duties and contact details of the person making the professional alert;
- the identity, functions and contact details of the persons who are the subject of the alert;
- the identity, functions and contact details of the persons involved in receiving or handling the alert;
- facts reported;
- information gathered in the course of verifying the facts reported;
- report on investigation operations;
- action taken on the alert.

In accordance with the amended French Data Protection Act of 6 January 1978 and European Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 "on the protection of individuals with regard to the processing of personal data and on the free movement of such data" (GDPR), any person may exercise their rights to information, access, rectification, deletion and opposition to the processing of their personal data by contacting the ADIT Group Compliance Officer or the DPO of the entity concerned.

² Processing means any operation or set of operations, whether or not carried out using automated processes and applied to personal data or sets of personal data.

IV. Control of the alert system

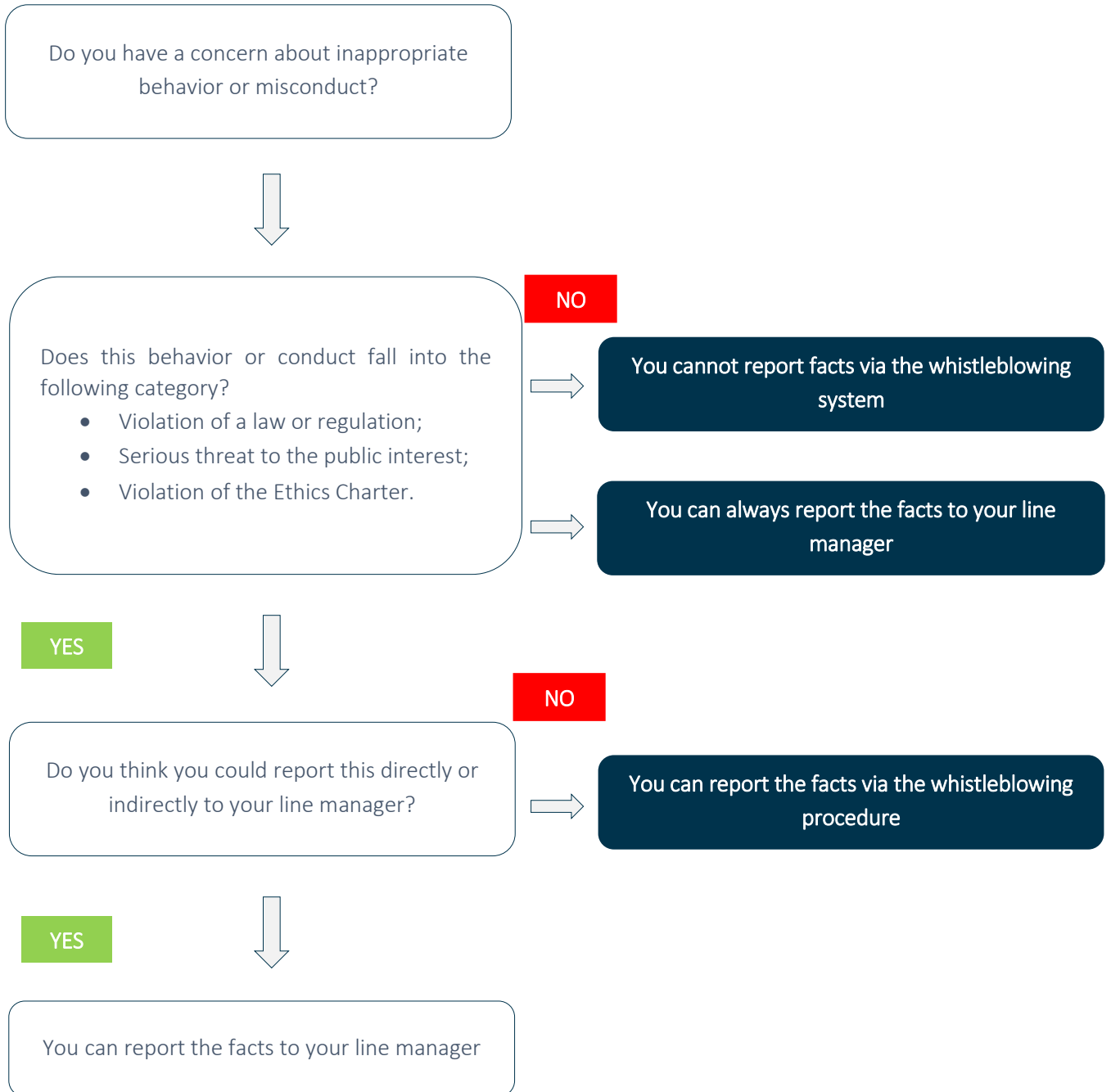
In accordance with the recommendations of the French Anti-Corruption Agency, various checks are carried out to monitor the whistleblowing system:

- A first-level control is carried out by the Compliance Officer to ensure that the whistleblowing system is working properly;
- A second-level control at Group entity level, which aims to suggest the adoption of corrective measures to adapt or improve the existing system (updating the risk mapping, updating a procedure, rolling-out new training, etc.);
- Third-level control, by integrating the alert system into the Group's internal audit control plan.

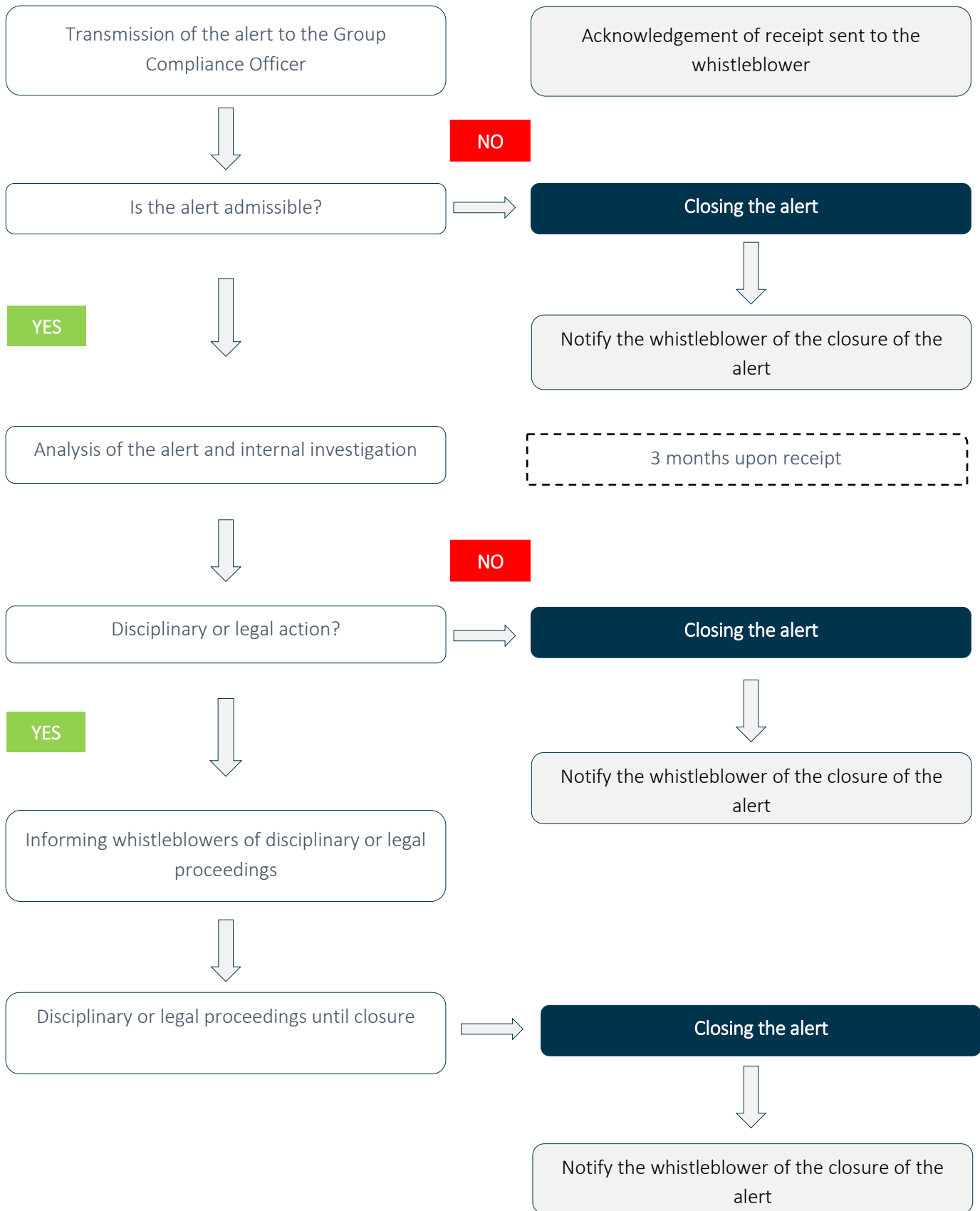
In addition, the Ethics Committee will submit an annual statistical report to the ADIT Group's management bodies (number of alerts received, closed without action or dealt with, processing times, issues raised, etc.) in order to assess the quality and effectiveness of the alert system.

Annex

Summary diagram: Issuance of the alert



Summary diagram: Processing of the alert



REDUCE UNCERTAINTY WORLDWIDE

EUROPEAN LEADER IN STRATEGIC INTELLIGENCE



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