

EVERAXIS Group Whistleblowing Policy

Introduction

At EVERAXIS, Integrity, Ethics, conformity to International, local laws as well as to Internal Group rules are essential principles for the conduct of its businesses.

Giving employees the opportunity to report any breach of the law or of our business Ethics is the best means to respect those principles.

This policy is based on the respect of fundamental laws and regulation such as:

- The Human Rights Charter of the United Nation
- The French Sapin II Law of 9 December 2016 and the French Law of 21 March 2022 on the protection of Whistleblowers
- The European Directive (UE) 2019/1937 of 23 October 2019 of the European Parliament
- The US Federal Whistleblower Protection Act of 1989
- The Swedish law...Lag (2021:890) om skydd för personer som rapporterar om missförhållanden

All companies forming the EVERAXIS Group are bound by this policy. Any report will be handled in compliance with its terms. This policy is part of our Code of Ethics and Business.

1) The Ethics Committee and the Ethics Agents

The EVERAXIS Group a set up an Ethics Committee which Chairman is Dominique MALLET, CEO.

The mission of the Ethics Committee is to ensure that business is conducted in compliance with the highest standard of Ethics.

The Committee is assisted by Ethics Agents at each site level in order to have a network of proximity and trust and enable the management of an alert locally and most efficiently.

Having several Ethics Agents on each site offers more confidence to people needing to report a concern but also permit to exclude one of them of an investigation in case of conflict of interest.

Each site has at least 2 Ethics Agents. To consult the list, please refer to **USEFUL INFORMATION** at the end of this policy.

2) Type of behavior (s) that can be subject to an alert

Subject to the admissibility of an alert, various types of behaviors can be reported including but not limited to:

- A breach to our Code of Ethics and Business,
- A breach to people health and safety of working conditions,
- A material breach to environment,
- A case of harassment, discrimination or conflict of interest,
- A violation of anti-bribery, money laundering laws or influence peddling,
- A embezzlement, a fraudulent or financial fraud or a criminal crime,
- A breach to Export control laws and regulation,
- The non-respect of an embargo or economic sanctions,
- A breach of personal data protection laws

This list may evolve over the time and is not exhaustive.

3) Protection for whistleblowers

Whistleblower (s) must be able to speak out without fearing any retaliation. EVERAXIS has a zero tolerance policy with retaliation. Therefore anyone can report any concern without fear. If however, a person is suspecting being subject to retaliation, the Group Compliance Officer and/ or local Ethics Agents should be informed immediately.

Local laws also confer protection to whistleblowers and prohibit any retaliation against whistleblowers. Companies may also be subject to criminal sanctions.

4) Available means to report an alert

A concern can be issued through several means.

The choice of reporting means remains at the discretion of the whistleblower depending on her/his/their level of trust or serenity to report an appropriate or illegal behavior and her/his/their willingness to identify themselves.

The management of an alert implies the conduct of an investigation and knowing the identity of the whistleblower may ease and accelerate the investigation.

In order to conciliate the investigation and a possible desire by the whistleblower to remain anonymous, a digital platform is also available.

Non digital means

- Sending a postal mail to the Compliance Officer or to one Ethics Agent: we recommend using a first envelop –closed- with the mention « reporting an alert» (for instance) that will be put in a second envelop which will be send to the Compliance Officer or to one Ethics Agent in order to ensure the confidentiality of the alert. Addresses of each site are indicated at the end of this document under ***USEFUL INFORMATION***
- Taking an appointment with one of the Ethics Agent,
- Informing a manager,
- Informing the HR Department,
- Informing the Group Compliance Officer (Head of Legal Department),
- Informing the EH&S Manager.

The whistleblowing digital platform (*)

The EVERAXIS whistleblowing digital platform has been developed by our partner EQS and is accessible from a smartphone, a PC or a tablet.

The platform is open to employees and is available in several languages. It will be open to others stakeholder at a later stage.

(*) The digital platform will be available in July 2022.

5) Processing an alert

➤ ***Receipt via an Ethics Agent***

If an Ethics Agent receives an alert, he/ she will inform the others Ethics Agents of the relevant site and the Group Compliance Officer. The Group Compliance Officer will inform the local General Manager.

An investigation team will be set up to investigate the case.

➤ ***Receipt via the Digital Platform***

If an alert is issued via the EQS platform, it will be received by the Group Compliance Officer and the Group HR Director who will allocate the case to 2 local Ethics Agents liaising with the local General Manager and one member of the Ethics Committee. An investigation can also be allocated to Ethics Agents of another site depending on the case.

No matter the means of receipt, the first step however will be to run a preliminary conflict of interest check in order to ensure impartiality of each member of the investigation team. Any member suspected of conflict of interest will be excluded from the investigation.

6) Conduct of an investigation

If there is no conflict of interest or once it is cleared, if any, the investigation team will then proceed with the second step and check the admissibility of the alert.

Admissibility: an alert must be issued *in good faith* for reasons figuring in this policy and which the person issuing the alert has personally and direct knowledge, either because she/he is the direct witness of the facts or because she/he is the victim.

An alert cannot be issued maliciously toward a person or done with the intent to harm or to cause offense.

Anonymity: thanks to the Platform, any whistleblower may stay anonymous but cooperate with the investigation and therefore contribute to stopping the illegal or inappropriate behavior.

To that effect, the platform offers the possibility to create a **secure inbox** and share with the Ethics Agents in charge of the investigation. The EQS Platform is independent of EVERAXIS IT system and an email address created via the platform will not be tracked.

As mentioned, self-identification is encouraged in order to facilitate the investigation and the understanding of the situation.

The steps to create an email box are describe on the platform.

Conduct of the investigation: if the alert is admissible, the investigation team will conduct the investigation:

- Ensuring the respect of the confidentiality which is essential to collect information, safeguarding anonymity and trust, and evidences of reported facts,
- Study the facts, review internal documents, interview person who can provide explanation on the facts, limiting the number of persons involved and informing them of the confidential nature of the investigation,
- Depending on the nature of the alert, the difficulty or the severity of the facts, Ethics Agents may request advice from external counsels in order to qualify a fact. They are bound by professional secrecy and confidentiality,
- Propose protective measures of the person, if needed,
- When all the information has been collected, the investigation team will :
 - Issue a report with their conclusion,
 - If the facts are not evidenced, the investigation will be closed,
 - If the facts are evidenced, depending their severity, sanctions will be applied in accordance with the applicable law.

The role of Ethics Agents involved in the conduct of the investigation is only to confirm whether the case is evidenced or not. In no event do they decide about the sanction, if any.

If a case reported is confirmed and subject to sanction, only the General Manager is empowered to decide about the sanction which will be discussed with the HR Department. An Ethics Agent also member of the HR department may however advise the General Manager on available sanctions under applicable law.

7) Sanctions

Sanctions depend on the facts and their severity.

It can be disciplinary sanctions from simple accountability up to a decision of exclusion of the company in cases that merit it, especially in case of financial crime exposing the company or the Group to criminal sanctions.

USEFUL INFORMATION

The Whistleblowing Policy is shared with all employees by each local HR department.

FRANCE

EVERAXIS Aerospace & Defence

5 Avenue Denis Papin, BP 36
F- 92 230 Le Plessis-Robinson

The List of Ethics Agents will be available on usual information boards.

EVERAXIS Industries

18 Allée Montréal
Ville-la- Grand
F- 74 108 Annemasse

The List of Ethics Agents will be available on usual information boards.

SWEDEN

EVERAXIS AB

Torshamnsagatan 30F,
164 40 Kista

The List of Ethics Agents will be available on the "intranät- ledningssystemet".

USA

EVERAXIS USA, Inc.

3030 S Horseshoe Drive Suite 300,
NAPLES, Florida, 34104

The List of Ethics Agents will be available on usual information boards and TV monitors in the production area.