

## WHISTLEBLOWING POLICY

### Introduction

For EVERAXIS, **respect of ethics**, laws and regulation, or internal rules are essential principles in the conduct of its businesses.

The main principles on which the Group bases its action are written in the **Code of Ethics**.

### Purpose

The goal of this policy is to ensure that all people working for EVERAXIS understand that they can **speak up, at any time, including anonymously**, any fact that is contrary to our **Code of Ethics**.

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

- The Human Rights Charter of United Nation
- The French Sapin II Law of du 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

### Scope

All employees, whatever their position, as well as any person working for EVERAXIS, are bound by this policy worldwide.

#### **1) The commitment of the CEO and the Management**

**Dominique MALLET, CEO**, is personally committed to respect of integrity, which is one of the FIVE core values of EVERAXIS' Group, and encourages everyone in his daily mission to watch and apply this principle and be kind to colleagues.

All managers of the Group are also committed to apply this principle.

#### **2) Ethics Agents**

EVERAXIS has set up a network of Ethics Agents on each site in order for people wishing to speak up a fact that seem contrary to the Ethics, to do it trustfully, with local colleagues. Ethics Agents are bound by a confidentiality undertaking.

Each site has at least two Ethics Agents. Their name is available on usual information boards.

#### **3) Types of facts that contrary to Ethics**

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

- A breach to people health and safety of their working conditions,
- A case of harassment, discrimination
- A case of conflict of interest,
- A case of bribery, money laundering or influence peddling,
- A case of misuse of company assets, a fraudulent or financial fraud,

- A breach to Export control laws and regulation,
- The non-respect of an embargo or economic sanctions,
- A breach of personal data protection laws

Generally, **any fact contrary to principles described in our Code of Ethics**. This list may evolve over the time and is not exhaustive.

#### **4) Protection for whistleblowers**

**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, he/she must inform either the Legal Department, the HR department and/ or local a Ethics Agent. Retaliation against whistleblowers is strictly prohibited by law.

#### **5) How to report an alert**

There are 2 means available to report a fact contrary to Ethics:

##### **"Standard" Non digital means**

- Sending a postal mail to the Legal Department 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, in order to ensure the confidentiality of the alert. Addresses of each site are indicated at the end of this document under **Useful Information**.
- Informing one of the Ethics Agent,
- Informing one's manager,
- Informing the HR Department,
- Informing the Legal Department & Compliance,
- Informing the EH&S Manager.

##### **The digital platform INTEGRITY LINE**

EVERAXIS' whistleblowing digital platform <https://everaxis.integrityline.com> is available in each country where EVERAXIS operates in the local language(s), from a **smartphone**, a **PC** or a **tablet**.

The platform is open to people working for EVERAXIS (including temporary and interim employees) and is available in several languages. It will be open to others stakeholder at a later stage.

**Anonymity:** you can elect to stay anonymous and cooperate to the inquiry by providing details and therefore contribute to make the illegal or inappropriate behavior cease.

Any alert notified via the platform will be received by the Head of Legal & Compliance and the Group HR Director who, after checking any conflict of interest, will transfer the case to local Ethics Agents, except if the nature of the case justifies that they manage it directly.

The first step of an inquiry is to run a preliminary conflict of interest check in order to ensure impartiality of each member of the investigation team. Any person suspected of conflict of interest will not be involved.

#### **6) Conduct of an investigation**

The second step is to check the admissibility of the alert.

**Admissibility:** an alert must be issued **in good faith**, in case of occurrence of facts mentioned in point 2 above. It is not necessary that the person issuing the alert has personal and direct knowledge of the facts, or that she/he is the direct witness or the victim. However, an alert cannot be issued maliciously or done with the intent to harm or to cause offense.

The platform is independent of EVERAXIS' IT system and offers the possibility to create a **secure inbox** and share with the team in charge of the investigation. The email address created via the platform will not be tracked.

**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 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 liaising with Legal or HR teams. 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 admissible or not evidenced, the investigation will be closed,
  - If the facts are evidenced, depending their severity, sanctions will be applied in accordance with applicable law.

The role of Ethics Agents involved in the conduct of the investigation is to collect information and 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.

## **7) Sanctions**

Sanctions depend on the facts and their severity.

Facts contrary to ethics in the conduct of business can have serious consequences for the Group's reputation and hinder its development.

Any breach can lead to disciplinary sanctions from simple accountability up to a decision of exclusion of the company in case of serious breach. In case of criminal offense, such as bribery for instance, the Group may be exposed to criminal sanction, and people involved in the case, be subject to prosecution and condemned to fine or even jail.

**ETHICS IS EVERYONE BUSINESS!**

**DO NOT HESITATE TO USE INTEGRILTY LINE IF YOU WITNESS, OR ARE A VICTIM OF, OR SUSPECT A FACT CONTRARY TO ETHICS**

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## **Useful Information**

### **FRANCE**

#### ***EVERAXIS Aerospace & Defence***

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

The List of Ethics Agents is available on usual information boards.

#### ***EVERAXIS Industries***

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

The List of Ethics Agents is available on usual information boards.

### **SWEDEN**

#### ***EVERAXIS AB***

Torshamnsagatan 30F,  
164 40 Kista

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

### **USA**

#### ***EVERAXIS USA, Inc.***

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

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