PROFESSIONAL WHISTLEBLOWING SYSTEM

REPORT

When confronted with a problem of ethics, any collaborator should inform his/her direct or indirect superior or business unit manager where he/she carries out his/her activity so that the latter may be able to advise them or take the appropriate decision by consulting Trigano’s general management if need be.

Trigano also provides all collaborators with a professional whistleblowing system to selflessly and in good faith report facts that they have personally been made aware of concerning a crime or misdemeanor, a gross and patent violation of law or regulation, a grave menace or prejudice to the public interest, especially concerning:

- corruption and influence peddling (in particular all behaviors or situations contrary to the rules presented in its code of conduct in the fight against corruption or its ethical charter)
- accounting irregularities
- irregularities in stock market matters (insider trading)
- risks related to serious infringements against human rights and fundamental rights, health and safety of the people as well as the environment resulting from the company’s activities or those of its subcontractors or suppliers.

This professional whistleblowing system is open:

- to any Trigano collaborator or subsidiary and is reserved to them for the reporting of existing behaviors and situations contrary to the anti-corruption code of conduct,
- as well as to any outside and occasional collaborator (temporary staff, interns, subcontractor’s personnel or provider).

The whistleblowing system shall be used with respect to applicable laws and regulations. An employee’s failure to resort to the whistleblowing system is not a breach. No sanction may be taken against a collaborator who has reported selflessly and in good faith a breach against Trigano’s values which are stated in the code of conduct in the fight against corruption, the ethical charter, company bylaws or their equivalent. A proper use of the
system, even though the facts later prove to be inexact, shall not lead to a discriminatory sanction or measure of any kind against the whistleblower.

However, the abusive use of this system shall expose them to disciplinary sanctions and legal action where appropriate: criminal sanctions as provided for at article 226-10 of the French penal code in case of false allegations and article R 625-8 of the French penal code for defamation.

WHISTLEBLOWING REPORT’S RECIPIENT

The data and information are transmitted to Trigano’s Ethics Controller who is held to an obligation of reinforced confidentiality:

Mrs. Francine GUILLONNEAU
Email: alerte-ethique-trigano@mailfence.com
Address: 100 rue Petit 75019 Paris
Phone: +33(0)1 44 52 16 32

RIGHTS OF THE PEOPLE NAMED IN A REPORT

Any person targeted by an alert is informed of the data concerning them in any form by the Ethics Controller as soon as the report is filed. He/she may access this data and request their rectification or deletion should they be inexact, ambiguous or obsolete.

Where appropriate, the person targeted by the report may only be informed once necessary provisional steps have been taken to prevent the destruction of the proofs pertaining to the report.

The following information is given to any person named in a whistleblowing report:

- a copy of the rules governing the whistleblowing report procedures and legal provisions regarding the report system detailed in the Guide to Whistleblowing Reports Collection and Processing,

- the facts that are being held against them,

- the list of the report’s recipients,

- the conditions for implementing his rights to access and rectification.

The person targeted by a whistleblowing report may not access the identity of the whistleblower whose strict confidentiality must be guaranteed.