

#1 REFERRAL TO THE ETHICS COMMITTEE

Any employee, partner or customer may contact the Ethics Committee, in accordance with the law and the rules applicable in the country in which he/she resides or carries on his/her business, if he is aware of a violation of the provisions of this Code of Ethics.

Regarding employees, **referral to the Ethics Committee is intended in cases in which the employee considers that informing his/her manager may present difficulties**, or that the irregularity noted may not be appropriately followed up by the latter.

To contact the Ethics Committee, **you should send an email to the address comite-ethique@groupe-eram.com** the email must come from an identified person and may not be anonymous, otherwise it will not be processed. The Ethics Committee can also be contacted by registered letter with acknowledgement of receipt addressed to the Ethics Committee, **St Pierre Montlimart, 49111 MONTREVAULT SUR EVRE**.

All reports should, as far as possible, be clear and detailed. They must provide accurate and relevant information to enable a thorough investigation.

#2 SURVEY PROCEDURES

The Ethics Committee agrees to meet and consider the request within 15 days, which may be reduced in exceptional circumstances. The Committee will study the file and provide an opinion within a maximum of 2 months. It may be assisted by any expert, whether internal or external, relevant to the subject referred to in the report.

#3 COMPOSITION OF THE ETHICS COMMITTEE

The Ethics Committee comprises:

the Group HRD

the Group Legal Director

A recognized ethicist

**A member of the Group's
Management Committee**

(this position will be held on a rotating basis
by each member of the Management Committee,
changing every 6 months)

If one of the members is affected by the report, he will withdraw and be replaced by another person who will be appointed by the other members of the Ethics Committee.

The Ethics Committee may, if it deems it necessary in the course of the investigation, request the participation of a staff representative.

#4 CONFIDENTIALITY

The identity of the person making the referral to the Committee, as well as that of the employee, partner or other entity named in the referral, **will remain confidential**. The **ERAM Group** also undertakes to ensure that no employee shall suffer any form of discrimination, change of status, harassment or otherwise, due to the use of the Ethics Committee or the provision of information in good faith within the framework of an investigation conducted by said committee.

Except in exceptional cases, **the persons implicated by a report will be informed of the breaches they are accused of when the report is received**. The Ethics Committee may nevertheless decide to take precautionary measures, in particular to prevent the destruction of evidence, before informing the persons concerned.

The identity of the person implicated may not be disclosed, unless legally required, until the merit of the report has been established.

Data identifying the person making the referral and the person named in the referral will be destroyed within a maximum of two months following the opinion given by the Ethics Committee.

#5 «LANCEUR D'ALERTE»

The Ethics Committee is designated as the competent authority, within the Eram Group, to handle reports made by «lanceur d'alerte», in compliance with the provisions of french Organic Law No. 2016-1690 of 9 December 2016. Referral to the Ethics Committee constitutes the first level in the graduated procedure defined by this text.

No authority grants the status of «lanceur d'alerte». This status is attributed from the moment that a certain number of objective criteria are met:

- the «lanceur d'alerte» is a natural person who has personal knowledge of facts that he/she believes should be divulged or reported.
- the «lanceur d'alerte» has no interest, that is to say that he/she must not derive any benefit, including financial, from the report and must be acting in good faith; that is to say, he/she must have reasonable grounds to believe in the veracity of the reported violations.
- the facts reported must appear to constitute a crime, a misdemeanor or a serious and manifest violation of the law, or of a regulation, or of an international commitment duly ratified or approved by France, or a threat or serious prejudice to the public interest.
- The facts reported may not include information covered by the official secrets act, by medical confidentiality or by lawyer/client privilege.

If these criteria are met, **the «lanceur d'alerte» will benefit from additional legal protection** to prevent him/her from being held liable.

Conversely, an employee who, knowingly or through negligence, makes allegations or communicates information that he/she knows to be inaccurate, in bad faith or in which he/she has an interest, in any way whatsoever, will not benefit from said status and may be subject to 'disciplinary sanctions up to and including dismissal or, if applicable, prosecution for making slanderous accusations.

The procedure applicable to «lanceur d'alerte» is the same as that described above when reporting breaches of the provisions of the Code of Ethics.

To learn more about the status of «lanceur d'alerte»:

<https://www.defenseurdesdroits.fr/sites/default/files/atoms/files/guide-lanceuralerte-num-v3.pdf>

#6 CONSEQUENCES OF A BREACH OF THE PROVISIONS OF THE CODE OF ETHICS.

In the event of a proven breach, after investigation, of the provisions of this Code of Ethics, the employee responsible may, depending on the severity of the breach, be subject to disciplinary sanctions ranging from a warning to dismissal, in addition to any eventual claims filed against him/her.