

ETHICS ALERT PROCESS

Update: 22/01/2025

PRINCIPLES OF THE ETHICS ALERT PROCESS

SYSTRA has an Ethics Alert Process to report any dysfunction about matters relating to ethics or to the “duty of care”. The Group Compliance Officer is in charge of this process

This process has four main features:

1) It is optional

The use of the Ethics Alert Process is by no means an obligation for the persons concerned. Any potential user remains free to use, or not to use, this option. It is offered as a tool should any person consider it to be the most appropriate way to address any dysfunction about a matter regarding ethics or the “duty of care”.

This process is not intended to replace the employee’s normal management chain (direct supervisors, human resources) or employee representative bodies who can direct and advise you.

In addition, depending on the applicable law, the alert may be reported through external channels.

2) It is limited to specific types of situations

Facts reported must fall into one of the following categories:

- Conduct or a situation contrary to the Code of Ethics or the Anti-corruption Code of Conduct,
- A serious adverse impact – or a risk of serious adverse impact - on human rights and fundamental freedoms, health and safety of individuals or the environment, resulting from the activities of the SYSTRA Group or the activities of its subcontractors or suppliers,
- A crime or offence, such as corruption, influence peddling, fraud, coercive practices, collusion, discrimination, harassment...,
- A violation, or an attempt to conceal a violation:
 - of an international commitment,
 - of a unilateral act of an international organization,
 - of European Union law,
 - of a law or regulation,
- A threat or prejudice to the public interest.

The facts – or risks – reported must have occurred – or be likely to occur – within the SYSTRA Group or in connection with its activities.

3) Its territorial scope is unlimited

The Ethics Alert Process is intended to be applied to all SYSTRA Group’s activities, including those of its French and foreign subsidiaries, regardless of the location of the facts reported. Each alert will be analyzed according to the applicable law.

4) It is governed by rules on the protection of personal data

The receipt and processing of alerts are governed by technical and organizational measures designed to ensure the integrity and confidentiality of the information collected, in particular the identity of the reporting person, the persons concerned by the alert and any third party mentioned in the alert.

It complies with the conditions required by the data protection law, which include:

- The processing of the collected facts and their recipients,
- The retention period of personal data,
- Security measures and information for employees on this process,
- The rights of the persons whose data are processed in the context of the alert: they have the right to access their personal data and to rectify them in case of inaccuracy. In the cases provided for by law, they also have the right to erasure, the right to data portability, the right to object and the right to restriction of processing. For more information or to exercise your rights, please contact SYSTRA's DPO: personaldata@systra.com. You also have the right to file a complaint with the competent supervisory authority (see https://edpb.europa.eu/about-edpb/board/members_en).

USE OF THE ETHICS ALERT PROCESS

Who can use the Ethics Alert Process?

- Any employee of the SYSTRA Group, whatever the nature of their employment, including: apprentices, work experience students, consultants, temporary workers and, more generally, any external and occasional employee. This also includes former employees of the Group as well as candidates for a position within the Group, when the information contained in the alert has been collected in the course of their work or their application for a position with SYSTRA,
- SYSTRA's shareholders, management and supervisory board members,
- Employees and managers of the SYSTRA Group's business partners, i.e. clients, consortium partners, subcontractors, suppliers and their own subcontractors,
- Regarding reports of serious adverse impact - or risks of serious adverse impact - on human rights and fundamental freedoms, health and safety of individuals or the environment, resulting from the activities of the SYSTRA Group or the activities of its subcontractors or suppliers:
 - individuals or legal entities affected or having reasonable cause to believe that they may be affected by such adverse impact, and the legitimate representatives of such persons acting on their behalf;
 - trade unions and other workers' representatives representing individuals working in the business chain;
 - civil society organizations which are active and have experience in the areas concerned when the report concerns environmental damage.

Who can benefit from whistleblower status?

In order to benefit from whistleblower status, individuals using the Ethics Alert Process must meet all of the following conditions:

- Be an individual, except in the case of an alert concerning a serious adverse impact on human rights and fundamental freedoms, health and safety of individuals or the environment,

- Acting without direct financial compensation and in good faith.

How to set it in motion?

Alerts may be transmitted in any language to the Group Compliance Officer:

- By email to: ethics@systra.com
- In writing to: SYSTRA, Déontologue Groupe, 72 rue Henry Farman, 75015 Paris, France (it is recommended to write the word "confidential" in capital letters on the envelope)
- Through external digital channels, the links to which are available on the internet and intranet sites of the countries where these channels are set up.

To facilitate the processing of the alert, the reporting person should provide a contact method (e.g. email address) and appropriate details on the alleged facts, including any available relevant professional documents (e.g. letters, emails, SMS, accounting or financial documents, contracts, invoices, reports, written testimonials, certificates...), that may be used in the investigation.

Alerts can be sent anonymously. To allow the continuation of the exchanges during the processing of the alert, the reporting person can provide an email address which does not allow to identify themselves or any other means of communication.

In the case of an anonymous alert for which the reporting person has not provided a means of contact, the reporting person must be aware, on the one hand, that the alert may not be processed if it does not meet the conditions of admissibility listed below insofar as no additional information may be requested from them and, on the other hand, that they will not be able to exercise their rights relating to their personal data, nor to be informed of the follow-up given to their alert.

What must the alert contain to be admissible?

In assessing the admissibility of the alert, the following aspects will notably be considered:

- the detailed description of the facts (or risks identified), and their date if known, or the period of time concerned,
- the circumstances in which the reporting person became aware of them,
- the identity of the persons involved or the information allowing them to be identified (e.g. mention of a position) if known, and
- the country and activities concerned.

HOW ARE ALERTS PROCESSED?

Depending on the circumstances and the nature of the allegations, the Ethics Department may transfer the alert for processing to a local compliance officer or to any relevant department, in particular the Human Resources Department, the 3S Department or the Sustainability Department.

The reporting person receives an acknowledgement of receipt of the alert within 7 working days of its receipt. The admissibility of the alert is then analyzed. If the alert is not admissible, the reporting person is informed and redirected, as far as possible, to the appropriate department. If the alert is admissible, an investigation is carried out in accordance with the "Investigation Protocol" applicable within SYSTRA.

The reporting person will be informed in writing, within a maximum of 3 months from the acknowledgement of receipt of the alert, of the measures contemplated or taken to evaluate the accuracy of the allegations and, if necessary, to remedy the reported facts. The identity of any person named in the investigation will not be disclosed to the reporting person as part of this information.

When the investigation establishes that the allegations contained in the alert are inaccurate or unfounded, or when the alert has become irrelevant, the reporting person is informed in writing that the file has been closed.

WHAT GUARANTEES DOES THE WHISTLEBLOWER BENEFIT FROM?

When they meet the conditions of this status, whistleblowers benefit from guarantees:

1) Confidentiality of identity

The identity of the whistleblower will be protected. In particular, the identity of the whistleblower will not be communicated to persons who may be involved in the alert (even if they specifically request access to or communication of the identity of the whistleblower), except where such communication appears necessary for the processing of the alert. In the latter case, and in exceptional cases where it may be necessary to lift confidentiality, the person in charge of processing the alert must give prior notice to the whistleblower, explain the reasons for doing so and ask his or her permission to disclose his or her identity.

It is specified that this confidentiality will not apply in case of specific requests from public authorities, provided that they are authorized by law to access this information.

2) Protection against potential retaliation

A whistleblower who issues an alert as part of SYSTRA's Ethics Alert Process must under no circumstances be subject to retaliations for having issued the alert, even if the allegations contained in the alert are unfounded, in particular:

- Be sanctioned or dismissed,
- Be subject to discrimination directly or indirectly, for instance regarding remuneration, training, reclassification, assignment, qualification, professional promotion, transfer or contract renewal.

In the event of duly established unfavorable treatment, the Group Compliance Officer will take all necessary measures to restore the rights of the whistleblower, regardless of the penalties likely to be incurred by the author of such retaliations.

SANCTIONS INCURRED IN CASE OF UNTRUTHFUL ALERT

When the alert is issued with the intention of intentionally providing false information, the reporting person may, if established, be subject to disciplinary sanctions as well as legal proceedings in accordance with the applicable law.