INTERNAL WHISTLEBLOWING POLICY

PAPREC
COMPLIANCE

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I. Introduction

The Paprec Group undertakes to comply with all applicable laws and regulations and to conduct its activities in accordance with the values and rules defined in its Code of Conduct, Ethics Charter and internal policies.

In accordance with applicable legislative provisions, in particular the French Sapin II Law, French Waserman Law, the provisions adopted as part of Directive (EU) 2019/1937 of 23 October 2019 and the duty of vigilance introduced by French Law no. 2017-399 of 27 March 2017, the Paprec Group has set up an ethical whistleblowing system enabling anyone to report facts, in confidence, which he or she believes to be contrary to the laws and regulations, the Code of Conduct, the Ethics Charter and the Group's internal policies and procedures. The Paprec Group reminds employees that any breach of this policy will result in disciplinary action.

This policy applies to all Group entities, regardless of their geographical location.

This policy is part of the compliance programme implemented by the Paprec Group Compliance Department. It describes the procedures for receiving and analysing whistleblowing reports received by the Paprec Group.

II. Scope of application

1 - AUTHOR OF THE REPORT

The following individuals can make a report:

- Paprec Group staff members who are currently employed by the Group or have been in the past;
- Applicants for a job at the Paprec Group;
- Business partners, service providers, clients and suppliers, as well as their subcontractors and permanent or casual employees;
- Shareholders, associates and holders of voting rights or any decision-making body of the Paprec Group;
- Members of the administrative, management or supervisory bodies.

For a report to be considered as whistleblowing, its author must act in good faith, without receiving or asking for any financial or equivalent compensation. He or she must also, at the time of reporting, have every reason to believe that the facts reported are true.

2 - PURPOSE OF THE REPORT

A report may be considered as whistleblowing when it involves or is likely to involve:

- Any incident in the following areas: human rights, fraud, protection of personal data, harassment, international sanctions and embargoes, health and safety, environment, discrimination and all crimes and offences.
- Offences involving corruption, influence peddling, unlawful acquisition of interest, misappropriation of public funds or favouritism, as well as any conduct or situation contrary to the Group's Code of Conduct.
- A threat or serious harm to public interest.

However, this policy does not apply to facts, information and documents whose revelation or disclosure is prohibited by national defence secrecy, medical secrecy, the secrecy of judicial deliberations, the secrecy of judicial enquiries or investigations, or the professional secrecy of lawyers.

Nor does this policy apply to events arising from everyday professional disagreements, unless they fall within the scope of a situation mentioned above.

3 - GEOGRAPHICAL SCOPE

This policy applies to all companies and subsidiaries controlled by the Paprec Group, regardless of their geographical location.

In this policy, the Paprec Group strives to adopt a group-wide approach that reflects the highest level of protection.

III. Definitions

Reporting channel: The system used to make a report. The reporting channel may be verbal or written, internal or external.

Internal whistleblowing system: The overall system for collecting and processing whistleblowing reports within the Paprec Group, including this policy and the reporting channels, in particular the platform for receiving reports.

Internal investigation: The procedure carried out, in confidence, following a report. It is part of the internal investigation policy. It is carried out after gathering a detailed presentation of the facts and information needed to understand the report.

Facilitator: A natural person or privately owned, not-for-profit legal entity that helps the whistleblower to make a report.

Retaliatory action: Any act whose effect is to dissuade an individual from making a report, including disciplinary action, dismissal and any direct or indirect discriminatory measures.

Whistleblower: Any natural person who makes a report in good faith and without any financial compensation. This person, whether an employee of the Group or not, benefits from the status established by law and regulations. Whistleblowers must not be subjected to any retaliation or threats of retaliation.

Reporting: All reports received as part of the internal whistleblowing system, no matter how they are received. This report can be anonymous.

Protected third party: Any natural person or legal entity that is associated with the whistleblower and who helped the whistleblower to formulate or send the report, or is owned or controlled by the whistleblower, or works with the whistleblower, or has a professional relationship with the whistleblower (such as a supplier, customer or partner).



IV. Reporting channels

Whistleblowers have the option of using internal reporting channels. A report can be made verbally or in writing.

1 - INTERNAL REPORTING

a. The channels

The Paprec Group provides a number of internal channels for receiving reports.

A report can be made by using:

- The central channel: via an online platform accessible on the Group's website at the following address: *www.paprec.com* or by scanning this QR code
- The local channel, i.e. verbally to any of the Group's line managers.

In all cases, the report remains confidential. If whistleblowers wish to remain anonymous, they must use the dedicated platform. However, even when a report is made through the managers, whistleblowers can request that their identity is not disclosed.

Any report made verbally to a manager must be transcribed in writing and sent to the Human Resources Department or the Compliance Department.

In order for the report to be admissible and an internal investigation to be opened, whistleblowers must be as factual and complete as possible in their report. Whistleblowers may provide any evidence in support of their report or at least make it known that they have such evidence.

b. Content of the report

The aim of reporting is to relate the facts, not rumours or false accusations. Any abuse may give rise to disciplinary action.

To ensure that the report is dealt with quickly, authors should ask themselves the following questions when drafting the report:

- What are the facts?
- When did they occur?
  Are they still ongoing?
- Who are the people involved?
- What is the level of urgency or seriousness?
- Who is affected?

c. Recipients of the report

Reports are received via the channels stated above. Every report is analysed for admissibility, to determine whether an internal investigation is warranted.

The report will be investigated by the relevant department depending on the subject matter, for example, by the Compliance Department or the Human Resources Department.

This means that the channel selected for filing a report is not necessarily the one that will handle the investigation. As a general rule, reports made at local level are investigated locally, while those sent via the central channel are dealt with at Group level.

A potential or actual conflict of interest arises when a situation is likely to affect the objectivity, independence or impartiality of an individual involved in receiving or dealing with a report. This risk exists in particular when the person implicated in the report is directly or indirectly affected by the reported facts, has, for example, a personal or hierarchical link with the author of the report, the persons targeted or any other interested party, and the person receiving the report is not the person who will be analysing and/or investigating.

When a risk of conflict of interest is identified, the person in charge of the report must inform his or her line manager without delay, so that the situation can be assessed and dealt with in accordance with internal rules.

2 - EXTERNAL REPORTING

Breaches can be reported to the competent national authorities. This report may be subject to specific conditions depending on the authority it is sent to. A list of authorities is available on the Compliance Department intranet.

The Paprec Group encourages individuals to use internal reporting channels first of all, as this is an effective way to stop and rectify the alleged breach.

Whistleblowers may make a public disclosure if the report has not been dealt with in the required timeframe, if there is a risk of retaliation, if the report has no chance of succeeding, or if there is serious and imminent danger.

They may also publicly disclose information obtained in a professional capacity where there is an urgent need to do so or a risk of irreversible harm to public interest.

V. Dealing with reports

1 - ACKNOWLEDGEMENT OF RECEIPT

Whistleblowers will receive an acknowledgement of receipt within seven working days of the date of receiving the report.

2 - REPORT ADMISSIBILITY

In order to determine whether the report falls within the scope of this policy, it will be subject to an admissibility analysis.

Additional documents or information to determine admissibility may be requested by the recipient via the same channel as that used for receipt of the report.

If the report does not fall within the scope of this policy, it will be declared inadmissible and its author may be asked to contact the relevant department, if necessary. All information relating to the report (e-mails, file details) that could be used to identify individuals will be archived.

Admissibility is assessed on the basis of the following criteria:

- Material scope: Does the report involve a type of breach falling within the scope of the policy?
- Accuracy and appropriateness of the facts: Are the details provided sufficiently detailed (dates, names, context, facts observed) to enable an investigation to be carried out?
- Use of documents supplied: Are any attachments relevant, legible and usable (official documents, dated items, objective evidence, etc.)?
- Good faith and impartiality of the author: Does the author appear to be acting in good faith, without malicious intent or improper personal interest?

If the report is declared admissible, the whistleblower will be informed and an internal investigation will be opened.

Reports are handled with rigour, impartiality and objectivity, in accordance with applicable laws, in particular, employment law and personal data protection law.

3 - INTERNAL INVESTIGATION

The internal investigation is conducted in accordance with the procedures set out in the Paprec Group's internal investigation policy.

Whistleblowers will be informed, within a maximum of three months from the date that the acknowledgement of receipt was sent, about measures taken with regard to the report, even if the investigation is still ongoing.





VI. Role of the Compliance Department

The Compliance Department is responsible for managing and supervising the internal whistleblowing system at Group level.

In order to ensure consistent and reliable management of whistleblowing, the Compliance Department is responsible for receiving all reports sent via the central channel. It also assists local teams in dealing with the whistleblowing reports they receive, providing methodological and operational support. When the nature of the report so requires, the Compliance Department immediately refers the report to the appropriate department, such as the Human Resources Department or any other authorised entity, in order to ensure that it is dealt with appropriately. It also ensures that information flows smoothly and that the responsibilities of all parties involved in the internal whistleblowing system are respected.

It constantly monitors the system to ensure it is being used properly, in particular, with regard to confidentiality of information, protection of whistleblowers against any form of retaliation, and security of data processed.

The Compliance Department organises internal and external communications relating to the whistleblowing system and ensures that all employees and parties involved are properly trained in their obligations and responsibilities. It also ensures that the internal whistleblowing policy and associated documents are updated and that they are distributed throughout the Group, in order to ensure that the system is continually up to date and compliant over the long term.

It regularly informs the Group's governing bodies about reports, related investigations and remedial action taken.

VII. Protection of whistleblowers

In order to benefit from the protection afforded by whistleblower status, the report made must overall meet the following criteria:

- Focus on events that fall within the scope of this policy
- Be made in good faith. The person making the report must have had reasonable grounds to believe that the information relating to the potential breach reported was true at the time the report was sent.
- Be without any direct or indirect financial compensation.

Reports based on rumours, unfounded accusations, the use of the system to denigrate or harm others, or the deliberate transmission of false information, do not qualify for whistleblower status and may result in disciplinary action.

Such acts may also give rise to prosecution under the law for slander/libel or public defamation. The status of whistleblower is also extended to the facilitator(s), i.e. any person(s) who helped the whistleblower to submit the report, to persons linked to the whistleblower (such as family members or colleagues) or legal entities owned or controlled by the whistleblower. They are considered to be 'protected third parties'.

Whistleblowers are protected against any form of retaliation. No retaliatory or discriminatory action may be taken against a person who, in good faith, has expressed a concern or reported facts in accordance with this policy, even if these facts do not ultimately lead to an internal investigation. Therefore, any person within Paprec, regardless of position, who takes action in retaliation against a whistleblower is liable to disciplinary action, even including dismissal.

VIII. Protection of personal data

As part of the receipt, analysis and handling of reports, the Paprec Group, in its capacity as data controller, processes personal data about the whistleblower, the persons concerned and, more generally, any person involved in the report. Access to personal data is restricted to authorised persons involved in dealing with the report.

Processing reports made under the internal whistleblowing system is based on legal obligations arising in particular from the Sapin II Law and the duty of vigilance. Its purpose is to ensure that reports covered by this policy are properly received and analysed, to determine the appropriate measures to be implemented following these reports and, if necessary, to enable the organisation to exercise or defend its rights in administrative or legal proceedings.

In accordance with the principle of data minimisation, only data that is strictly needed to deal with the report is collected.

Data subjects are informed that their personal data will be processed, except where such information is likely to compromise the investigation, interfere with the gathering of evidence or prevent the proper handling of the report. In these cases, information is deferred until the risk has disappeared.

The collection of so-called sensitive data (origin, opinions, beliefs, health, sexual orientation, etc.) is only authorised when it is essential to the analysis of the report, and is strictly limited to this requirement.

Data, including supporting documents, is stored confidentially, securely and with restricted access. Information relating to a report is kept confidential and secure.

Persons whose personal data has been collected during the processing of a report have the rights of access, rectification, restriction or erasure which they can exercise by contacting the Data Protection Officer of Paprec Group at the address:

donneespersonnelles@paprec.com

IX. Confidentiality

The Paprec Group undertakes to treat all reports confidentially and to protect the identity of the person making the report, the information leading directly or indirectly to his/her identification, the content of the report and the identity of the person or persons mentioned therein, unless a judicial authority needs to see the report or unless compelled to disclose it by a judicial authority.

The recipient of the report will take all necessary measures to protect the security and confidentiality of the report, data and associated documents (including collection, processing and storage).

Any unauthorised disclosure of such information may result in disciplinary action for the perpetrator.


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