

Procedure for collecting alerts

Objective and scope:

The LISI Group complies with French law (Appendix 1): this document describes, in accordance with the law and decrees in force, the procedure for collecting and processing alerts. The alerting system is open to internal employees, occasional and external employees of the LISI Group. It applies to all subsidiaries of the LISI group.

The use of the alerting system must be in compliance with the law and the rules applicable in the country where the author of the alert resides or carries out his activities.

A – Who is the author of the alert ?

A whistleblower:

- is a natural person
- does not have to be an employee of LISI
- is disinterested and of good faith, that is to say that the whistleblower acts without any desire for personal gain, and may legitimately believe in the truth of the facts,
- was in direct contact with the facts,
- is a person who reports or reveals a crime (e.g. aggravated robbery) or an offense (e.g. bribery), a violation of the law or, more generally, a serious threat or harm to the public interest (e.g. the environment).

The implementation of the right of alert imposes strong empowerment of each and everyone. Abuse of the system may result in disciplinary, civil and/or criminal penalties.

B – What kind of alert ?

The alert may deal with facts related to bribery or influence peddling, trust, the violation of labor law or human rights, the breach of environmental law, tax evasion.

The alert system cannot be used for events presenting an immediate threat to life or property. If such cases arise, to respond to the urgency, it is advisable to refer to your direct hierarchy, emergency services or if necessary local authorities.

C – A gradual, three-stage procedure

The collection system is developed with gradual, secure alerting channels.

Tier 1 - It is necessary to use the internal channel first (any direct or indirect hierarchical superior, the employer or a member of the Compliance Committee). In addition to the traditional channels, the LISI Group has a secure system described in the following section "How to address the alert ?".

Tier 2 - If the alert has not been processed internally within approximately 2 months, it can be sent to the judicial or administrative authority.

Tier 3 - If the alert has not been processed by the authorities within 3 months, it can be made public.

D – How to address the alert ?

Reporting of an alert is brought to the attention of the LISI Group Compliance Committee via a secure system posted on the LISI Group website. A link to access this system can be found in the "Ethics" section of the website. The Compliance Committee is composed of three people whose functions are: the Group Legal Manager, the Group Human Resources Manager and the Internal Audit Manager. It is chaired by the Group's Chief Operating Officer.

Declaration of alerts can be made in the language desired by the whistleblower.

E – Can the author of the alert be anonymous ?

Anonymous reporting is not part of the LISI culture. For these reasons, LISI has opted for a non-anonymous alert system. When you issue an alert, you must fill in your name, your first name and a valid email address.

F – What protection and confidentiality are put in place for the author of the alert ?

The author of the alert is assured of being protected from direct or indirect reprisals. If he is an employee of the LISI Group, for example, he cannot be dismissed, sanctioned or discriminated in any way for having reported facts in accordance with the procedure for reporting alerts. The internal system offers a strict guarantee of confidentiality. No disciplinary or discriminatory measure in relation to the alert will be exercised against the author of the alert provided that the person acted in good faith.

The LISI Group undertakes to take all the necessary steps to protect the identity of persons issuing an alert as determined by law. The identity of the author of an alert cannot be revealed to the person(s) referred to by the alert without the prior written consent of the latter.

The alert will be treated confidentially, as well as subsequent investigations and reports, subject to any legal or procedural requirements.

In order to benefit from this protection scheme, the author of the alert must comply with the gradual three-step procedure described in paragraph C. In order to be guided in his approach, the author of the alert has the possibility to turn to the rights defender.

The LISI Group guarantees strict confidentiality of the author of the alert, the facts reported and the persons concerned. For this purpose, the Compliance Committee is authorized to disclose this information only to those who have a strict need to know it, who themselves are bound by an obligation of confidentiality, for the purpose of evaluating and processing the request, in terms of the hierarchical decision to be taken on the follow-up of the affair, the persons to consult to carry out the necessary checks, within the limits reasonably necessary for compliance with the legal obligation of alert confidentiality.

G – What protection is granted to the person(s) targeted by an alert ?

Any LISI Group employee who is the subject of an alert is presumed innocent until the allegations issued against him have been established.

He will be informed, after preliminary examination of the report, of the facts with which he is charged, in order to make use of his rights. The information, delivered in a secure manner through the internal system put in place by the LISI Group, will specify the following elements: the facts with which he is charged, the manner in which he exercises his rights of access and rectification and opposition of his personal data.

The data likely to identify the person implicated by an alert may be disclosed, except to the judicial authority, once the merits of the alert have been established.

These commitments apply even in the case of disclosure to third parties where this is necessary for the sole purpose of verifying or processing the report.

H – How are the reports processed ?

The author of the alert, once the identification form completed, will receive a file code and a password allowing him to transfer the details of the report confidentially and securely. This secure connection will then serve as a place of exchange between the author of the alert and the Compliance Committee for the duration of the investigation procedure. The author of the alert provides all the facts, information or documents, regardless of their form or medium, likely to support his report when he has such data. He provides the elements allowing, where appropriate, an exchange with the recipient of the report.

An e-mail will be sent to the author of the alert within 24 hours (working days) confirming receipt of the report.

The Compliance Committee will carry out an admissibility check and a review of the alert follow-up. If the report is non-admissible or unverifiable, then the relevant record will be destroyed without delay and the author will then be notified.

At the end of the investigation, and regardless of the outcome, a formalized and reasoned decision will be sent to the issuer of the alert by the Compliance Committee, including for the closure of all admissibility or verification transactions.



Details of the use of the system are available in Appendix 2 of this procedure.

I – Follow-up and archiving policies adopted

The data relating to the alerts will be kept, archived and destroyed in accordance with the legal and regulatory provisions in force.

When a disciplinary or legal procedure is initiated by the Compliance Committee or more broadly by the LISI Group against the accused person or the author of an abusive report, the data relating to the report will be kept until the end of the procedure.

J – Publication of the procedure

The LISI Group publishes the procedure for collecting alerts that it has established through its website, but also as an appendix to internal regulations if they exist within its French and foreign subsidiaries.

APPENDIX 1 – Excerpts from the texts of the Sapin 2 Law

LAW Nr. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life (1)

NOR: ECFM1605542L

ELI:<https://www.legifrance.gouv.fr/eli/loi/2016/12/9/ECFM1605542L/jo/texte>

Alias: <https://www.legifrance.gouv.fr/eli/loi/2016/12/9/2016-1691/jo/texte>

Chapter II: Protection of whistleblowers

Article 6 - A whistleblower is a natural person who discloses or reports, disinterestedly and in good faith, a crime or offense, a serious and manifest violation of an international undertaking duly ratified or approved by France, a unilateral act of an international organization taken on the basis of such an undertaking, law or regulation, or a serious threat or harm to the general interest, of which he has been personally aware.

Facts, information or documents, regardless of their form or medium, covered by national defense secrecy, medical confidentiality or the secrecy of relations between a lawyer and his client are excluded from the alert system defined by this chapter.

Article 7 - Chapter II of Title II of Book I of the Criminal Code is supplemented by Article 122-9 as follows: "Art. 122-9.-A person who infringes a secret protected by law is not criminally liable, provided that such disclosure is necessary and proportionate to the safeguarding of the interests in question, that it intervenes in accordance with the procedures defined by law and that the person meets the criteria for defining the whistleblower provided for in Article 6 of Law No. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life. "

Article 8 - I. - The report of an alert is brought to the attention of the direct or indirect superior, the employer or a designated representative. In the absence of due diligence by the person to whom the alert referred to in the first paragraph of this article is addressed to verify, within a reasonable time, the admissibility of the alert, it shall be sent to the judicial authority, to the administrative authority or to the professional orders. As a last resort, in the absence of processing by one of the bodies mentioned in the second paragraph of this article within three months, the report may be made public.

II. - In case of serious and imminent danger or in the presence of a risk of irreversible damage, the report may be brought directly to the attention of the bodies mentioned in the second paragraph of I. It can be made public.

III. - Appropriate procedures for the collection of alerts issued by members of their staff or by outside and casual collaborators are drawn up by public or private law legal entities of at least 50 employees, state administrations, communities of more than 10,000 inhabitants as well as the public institutions of intercommunal cooperation with own taxation of which they are members, the departments and the regions, under conditions set by decree by the Council of State.

IV. - Anyone can send their report to the Rights Defender in order to be referred to the appropriate organization to collect the alert.

Article 9 - I. - The procedures used to collect the alerts, under the conditions mentioned in Article 8, guarantee strict confidentiality of the identity of the authors of the report, the persons targeted by it and the information collected by all recipients of the report. The elements identifying the whistleblower can only be disclosed to the judicial authority with the consent of the latter. The elements likely to identify the person implicated by an alert can only be disclosed to the judicial authority, once the merits of the alert have been established. II. - Disclosing the confidential elements defined in I is punishable by two years' imprisonment and a EUR 30,000 fine.

Article 10 - I.- Article L. 1132-3-3 of the Labor Code is amended as follows: 1° After the first paragraph, a paragraph is inserted as follows: "No person may be excluded from a recruitment procedure or from access to an internship or a period of professional training; no employee may be penalized, dismissed or discriminated against, directly or indirectly, in particular as regards remuneration, within the meaning of Article L. 3221-3, profit-sharing or share distribution, training, reclassification, assignment, qualification, classification, professional promotion, transfer or renewal of contract, for having reported an alert in compliance with Articles 6 to 8 of Law Nr. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life. "; 2° The first sentence of the second paragraph reads as follows: "In the event of a dispute relating to the application of the first and second paragraphs, provided that the person submits facts which enable to presume that he has recounted or testified in good faith of facts constituting an offense or of a crime, or that he has reported an alert in accordance with Articles 6 to 8 of the aforementioned Law Nr. 2016-1691 of December 9, 2016, it is the defendant's responsibility, in the light of the evidence, to prove that his decision is justified by objective factors unrelated to the statement or testimony of the person concerned. "

II.- Article 6 ter A of Law Nr. 83-634 of July 13, 1983, on the rights and obligations of officials, is hereby amended as follows: 1° After the first paragraph, a paragraph is inserted as follows: "No official may be sanctioned or discriminated against, directly or indirectly, for having reported an alert in accordance with Articles 6 to 8 of Law Nr. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life. "; 2° The first sentence of the penultimate paragraph is amended as follows: a) The word: "three" is replaced by the word: "four"; b) The words: "or a conflict of interest situation" are replaced by the words: ", a conflict of interest situation or a report constituting an alert within the meaning of Article 6 of the aforementioned Law No. 2016-1691 of December 9, 2016"; 3° The last paragraph reads as follows: "An employee who reports or testifies to facts relating to a conflict of interest situation in bad faith or any act likely to result in disciplinary action, with intent to harm or with at least partial knowledge of the inaccuracy of facts made public or disseminated shall be punishable by the penalties provided for in the first paragraph of article 226-10 of the Criminal Code. "

Article 11 - After Article L. 911-1 of the code of administrative justice, an article L. 911-1-1 is inserted as follows: "Art. L. 911-1-1.-When applying Article L. 911-1, the court may prescribe to reinstate any person who has been the subject of a dismissal, a non-renewal of his contract or a dismissal in breach of the second paragraph of Article L. 4122-4 of the Defense Code, the second paragraph of Article L. 1132-3-3 of the Labor Code or the second paragraph of Article 6ter A of Law NR. 83-634 of July 13, 1983 on the rights and obligations of civil servants, including when that person was bound by a fixed term relationship with the legal person governed by public law or the body governed by private law responsible for the management of a public service. "

Article 12 - In the event of termination of the employment contract following the notification of an alert within the meaning of Article 6, the employee may appeal to the Labor Court as provided for in Chapter V of Title V of Book IV of the first part of the Labor Code.

Article 13 - I. - Any person who obstructs, in any way whatsoever, the transmission of an alert to the persons and bodies mentioned in the first two paragraphs of I of Article 8 is punishable by one year's imprisonment and a EUR 15,000 fine.

II. - When a complaint for defamation against a whistleblower is lodged with the investigating judge or the investigating chamber, the amount of the civil fine that can be pronounced under the conditions provided for in articles 177-2 and 212-2 of the Code of Criminal Procedure is increased to EUR 30,000.

Article 14 - [Provisions declared non-compliant with the Constitution by decision of the Constitutional Council Nr. 2016-741 DC of December 8, 2016.]

Article 15 -

- I. After the first paragraph of Article L. 4122-4 of the Defense Code, a paragraph is inserted as follows: "No soldier may be penalized or discriminated against, directly or indirectly, for having reported an alert in accordance with Articles 6 and 7 and I of Article 8 of Law Nr. 2016- 1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life. "
- I. Articles L. 1351-1 and L. 5312-4-2 of the Public Health Code are repealed.
- II. Articles L. 1161-1 and L. 4133-5 of the Labor Code are repealed.
- III. Article 1, paragraphs 3° and 4° of Article 2 and article 12 of the Law Nr. 2013-316 of April 16, 2013 on the independence of expertise in health and environment and the protection of whistleblowers are repealed.
- IV. Article 25 of Law Nr. 2013-907 of October 11, 2013 on the transparency of public life is repealed.
- V. [Provisions declared non-compliant with the Constitution by Constitutional Council Decision Nr. 2016-741 DC of December 8, 2016.]

Article 16 - Title III of Book VI of the Monetary and Financial Code is supplemented by Chapter IV as follows: "Chapter IV "Reporting professional misconduct to the competent supervisory authorities and protection of whistleblowers "Art. L. 634-1.- The AMF (Financial Markets Authority) and the Prudential Supervisory and Resolution Authority shall put in place procedures enabling them to be notified of any failure to comply with the obligations laid down by the European Regulations and by this Code or the AMF's General Regulation and supervised by one or the other of these authorities. "The AMF's General Regulation, as regards this authority, and an order of the Minister of the Economy, as regards the Prudential Supervisory and Resolution Authority, lay down the implementing rules of this chapter.

"Art. L. 634-2.-Put in place appropriate internal procedures allowing their staff to report any breach mentioned in Article L. 634-1: "1° The persons mentioned in paragraphs 1° to 8° and 10° to 17° of II of Article L. 621-9; "2. The persons mentioned in Article L. 612-2, when carrying out activities subject to the obligations laid down in the regulations referred to in Article L. 634-1. "Art. L. 634-3.-Individuals who have reported in good faith to the AMF or the Prudential Supervisory and Resolution Authority, facts likely to characterize one or more of the breaches mentioned in Article L. 634-1 cannot be the subject, for this reason, of a dismissal, a sanction, a discriminatory measure, direct or indirect, in particular as regards remuneration or professional development, or any other unfavorable measure. "Any decision taken in breach of the first paragraph of this article is void by operation of law. "In the event of a dispute relating to the application of the first two paragraphs, where the author of the alert establishes facts which make it possible to presume that he acted in good faith, it is the defendant's responsibility, in view of these facts, to prove that his decision is justified by objective elements unrelated to the alert. The judge may order any useful investigatory measure. "Art. L. 634-4.-The natural persons implicated by a report addressed to the AMF or to the Prudential Supervisory and Resolution Authority in respect of a breach mentioned in Article L. 634-1 may not be the subject, for the sole reason that they have been the subject of such a report, of a measure mentioned in the first paragraph of Article L. 634-3. "Any decision taken in breach of the first paragraph of this article is void by operation of law. "

Chapter III: Other anti-corruption measures and various breaches of probity

Article 17

I. - Chairmen, general managers and managers of a company employing at least 500 employees or belonging to a group of companies whose parent company is headquartered in France and whose workforce includes at least 500 employees, and whose turnover or consolidated turnover is greater than EUR 100 million, are required to take measures intended to prevent and detect, in France or abroad, any acts of corruption or influence peddling in accordance with the conditions laid down in II.

This obligation is also imposed:

1° On the chairmen and managing directors of public establishments of an industrial and commercial nature employing at least 500 employees, or belonging to a public group whose workforce includes at least 500 employees, and whose turnover or consolidated turnover is greater than EUR 100 million;

2° Depending on their duties, on the members of the executive board of public limited companies governed by Article L. 225-57 of the Commercial Code and employing at least 500 employees, or belonging to a group of companies whose workforce includes at least 500 employees, and whose turnover or consolidated turnover is greater than EUR 100 million.

When the company draws up consolidated accounts, the obligations defined in this article concern the company itself as well as all its subsidiaries within the meaning of Article L. 233-1 of the Commercial Code, or companies it controls, within the meaning of Article L. 233-3 of the same code. Subsidiaries or controlled companies that exceed the thresholds mentioned in this I are deemed to fulfill the obligations provided for in this article if the company that controls them, within the meaning of the same article L. 233-3, implements the measures and procedures provided for in II of this article and when these measures and procedures apply to all subsidiaries or companies it controls.

II. - The persons mentioned in I implement the following measures and procedures:

1° A code of conduct defining and illustrating the different types of behavior to be prohibited as they are likely to characterize corruption or influence peddling. This code of conduct is incorporated into the company's internal regulations and is therefore the subject of the consultation procedure with the staff representatives provided for in Article L. 1321-4 of the Labor Code;

2° An internal alert system to allow the collection of reports from employees and relating to the existence of conduct or situations contrary to the company's code of conduct;

3° A risk map in the form of regularly updated documentation designed to identify, analyze and prioritize the risks of exposure of the company to external solicitations for the purpose of corruption, in particular according to the sectors of activity and geographical areas in which the company operates;

4° Procedures for assessing the situation of customers, first-tier suppliers and intermediaries with regard to risk mapping;

5° Accounting procedures, internal or external, designed to ensure that books, records and accounts are not used to conceal corruption or influence peddling. These controls may be carried out either by the accounting and financial control departments specific to the company, or by having recourse to an external auditor during the completion of the accounts certification audits provided for in Article L. 823-9 of the Commercial Code;

6° A training system for executives and staff most exposed to the risks of corruption and influence peddling;

7° A disciplinary regime that sanctions the employees of the company in case of violation of the company's code of conduct;

8° A system of internal control and evaluation of the measures implemented.

Notwithstanding the liability of the persons mentioned in I of this article, the company is also liable as a legal person in the event of a breach of the obligations provided for in this II.

III. - The French Anti-corruption Agency monitors compliance with the measures and procedures mentioned in II of this article.

The control shall be carried out in accordance with the conditions laid down in Article 4. It gives rise to the drawing up of a report sent to the authority which requested the control and to the representatives of the controlled company. The report contains the Agency's observations on the quality of the corruption prevention and detection system put in place within the controlled company as well as, where appropriate, recommendations for the improvement of existing procedures.

IV. - In the event of a breach, and after having given the person concerned the opportunity to submit his observations, the magistrate who heads the agency may issue a warning to the company's representatives.

He may refer to the Sanctions Committee to require the company and its representatives to adapt the internal compliance procedures intended for the prevention and detection of corruption or influence peddling.

He may also refer to the Sanctions Committee for the imposition of a financial penalty. In this case, he informs the natural person in question and, in the case of a legal person, its legal representative, of the relevant allegations.

V. - The Sanctions Committee may order the company and its representatives to adapt the company's internal compliance procedures for preventing and detecting corruption or influence peddling, in accordance with the recommendations it makes for that purpose, within a time limit which it sets and which may not exceed three years.

The Sanctions Committee may impose a financial penalty, the amount of which may not exceed EUR 200,000 for natural persons and EUR 1 million for legal persons.

The amount of the financial penalty imposed shall be proportionate to the seriousness of the breaches found and the financial situation of the sanctioned natural or legal person.

The Sanctions Committee may order the publication, dissemination or posting of the injunction or financial penalty decision or of an extract from it, in accordance with the procedures it specifies. The costs are borne by the sanctioned natural or legal person.

The Sanctions Committee makes a reasoned decision. No sanction or injunction may be pronounced unless the person concerned or his representative has been heard or, failing that, duly summoned.

The financial penalties are paid to the National Treasury and recovered as claims of the State foreign to the tax and the estate.

A decree in Council of State specifies the conditions of operation of the committee, in particular the conditions of challenge of its members.

VI. - The action of the French Anti-Corruption Agency is barred by statute of limitations if, three years from the date on which the breach was established, no action has been taken to sanction the breach.

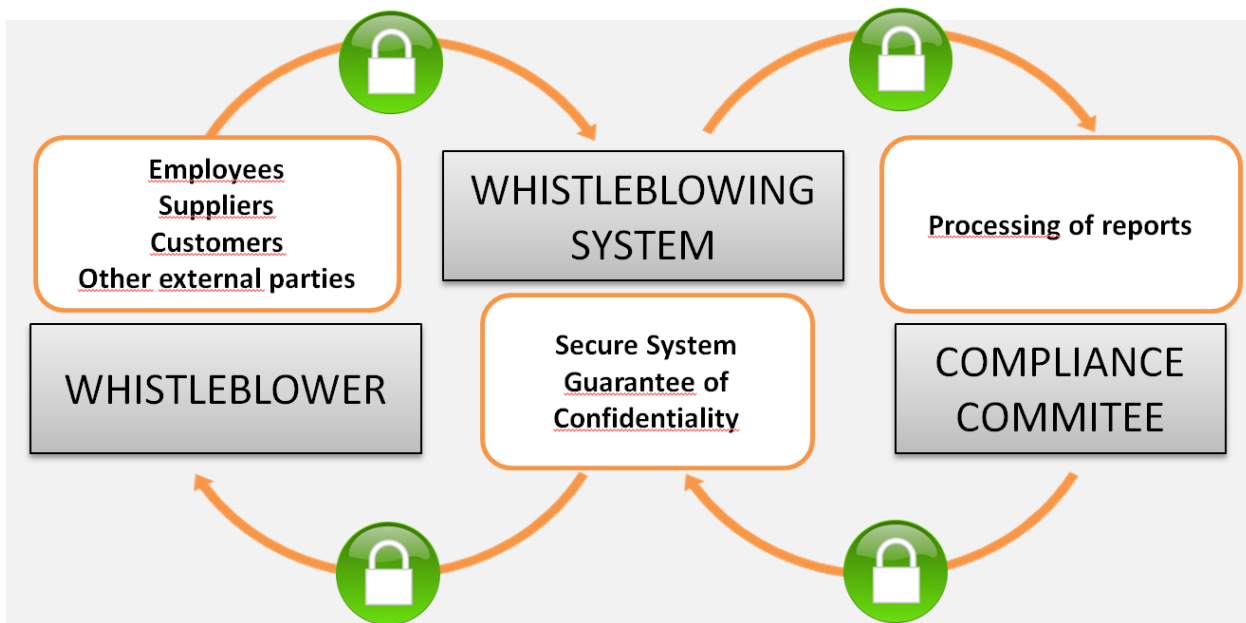
VII. - Appeals against the decisions of the Sanctions Committee are remedies of full jurisdiction.

VIII. - This section comes into force on the first day of the sixth month following the promulgation of this law.

APPENDIX 2 - Illustrated detail of the internal reporting system of the LISI group

LISI Group's internal reporting system is accessible via the LISI website under "Ethics". It is translated into 9 languages: French, English, German, Spanish, Polish, Turkish, Czech, Arab and Chinese.

The diagram below describes in a synthetic way the functioning of the device:



The author of a report must initiate his request by completing an identification form:

Whistleblowing Form - Identification

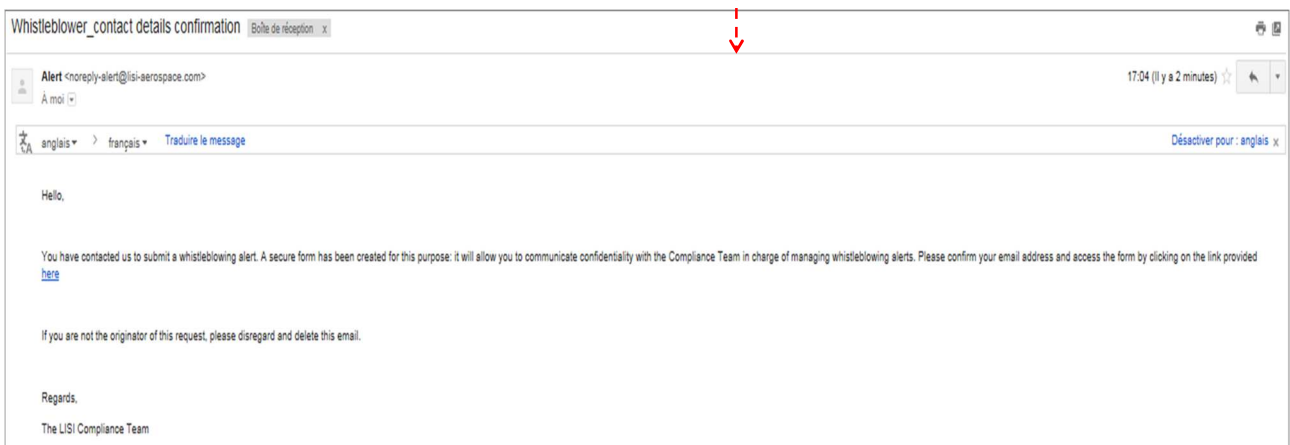
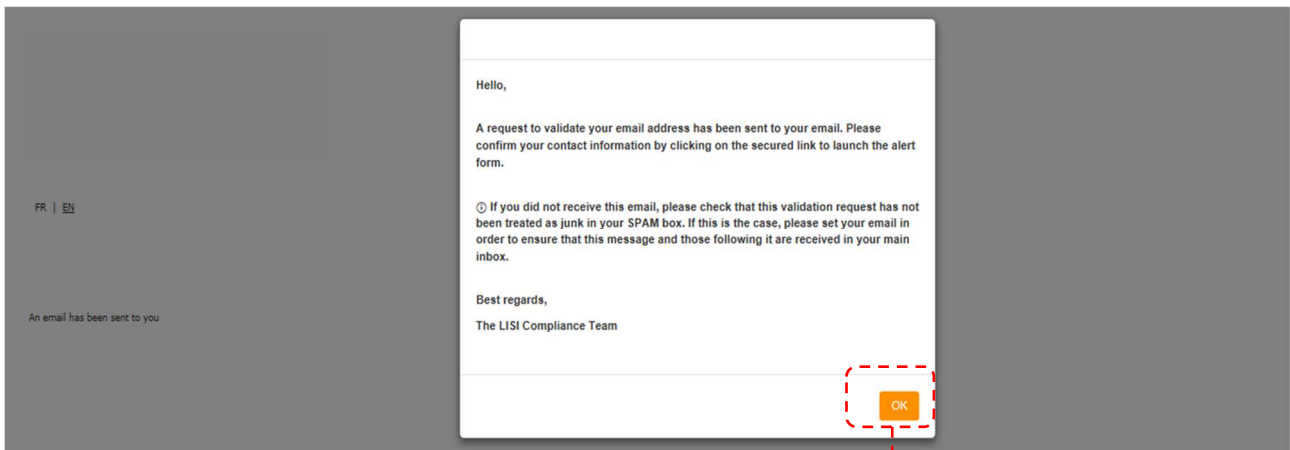
FR

<p>Name</p> <p>Firstname</p> <p>Email</p> <p>Phone number</p>	<p>whistle</p> <p>blower</p> <p>whistleblowinglisi@gmail.com</p> <p></p>	<p>Next step</p>
---	--	------------------

✓ Je ne suis pas un robot reCAPTCHA

You must validate the captcha

A message is sent automatically to the author of the report in order to verify his email address.



After this verification step, the author of the report can access the second part of the form in which he can detail the facts and other elements constituting the record of the report.

Secure Whistleblowing Form

Name	whistle
Firstname	blower
Email	whistleblowinglisi@gmail.com
Phone number	
What is your role in relation with LISI?	role in relation with LISI role in relation with LISI role in relation with LISI role in relation with LISI
Specify the persons involved in the acts	persons involved in the acts persons involved in the acts persons involved in the acts persons involved in the acts
Where did the acts giving rise to the alert occur?	Where did the acts giving rise to the alert occur. Where did the acts giving rise to the alert occur. Where did the acts giving rise to the alert occur. Where did the acts giving rise to the alert occur.
Period of occurrence of the acts giving rise to the alert(month/year)	Period of occurrence of the acts Period of occurrence of the acts Period of occurrence of the acts Period of occurrence of the acts
Description of the acts	the acts Description of the acts Description of the acts Description of the acts Description of the acts Description of the acts Description of the acts Description of the acts

Attached files :

- D:\Users\labernard\Desktop\SAPIN2\attached file 1.pdf
- D:\Users\labernard\Desktop\SAPIN2\attached file 2.pdf

Submit

Once the report is submitted, the author of the report will automatically receive, in a first email, a folder code assigned randomly and in a second e mail, a password: this is for him to communicate with the Compliance Committee confidentially and securely.

