

Procedure for collecting and processing of alerts



LISI GRC

Purpose and scope:

In accordance with the applicable laws and regulations to which the LISI Group is subject¹, this document sets out the procedure for receiving and processing reports. The reporting mechanism is open to all the Group's stakeholders and applies to each of the Group's subsidiaries.

However, the use of the reporting system must comply with the law and applicable regulations in the country where the person making the report resides or carries out their activities.

A. Who can make a report?

A whistleblower:

- is a natural person
- is not necessarily an employee of the LISI Group
- acts in good faith and without personal interest: the whistleblower therefore acts without any intention of personal gain or reward, and believes the facts they are reporting to be true,
- provides information of which they have become aware in a professional context,
- reports or discloses any act contrary to the LISI Code of Conduct, regardless of the nature of that act (see below for further details).

Exercising the right to report requires a high degree of personal responsibility from everyone. Misuse of the system may result in disciplinary, civil and/or criminal sanctions.

B. What types of reports are covered?

LISI aims to record all acts that contravene the LISI Code of Conduct. A report may therefore relate to:

- A crime or offence;
- A threat to or harm caused to the public interest;
- A breach or an attempt to conceal a breach of an international commitment duly ratified or approved by France, of a unilateral act by an international organisation taken on the basis of such a commitment, of the law, of regulations or of European Union law;

¹ Act No. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life & Act No. 2022-401 of 21 March 2022 aimed at improving the protection of whistleblowers

- Any other matters falling within the scope of such a whistleblowing mechanism under the national law in force in the country where the report is made.

These may include, for example, reports of crimes or offences relating to the following areas: human rights violations, corruption and/or influence peddling, harassment or discrimination, violence, threats and other serious offences against persons, financial malpractice and/or accounting fraud, quality fraud and/or concealment of quality risks, environmental offences, damage to property, fraud, and risks to information security and/or information systems.

Reports that do not fall within the categories described above will not be processed and will be deleted after the whistleblower has been informed.

The reporting system must not be used for incidents posing an immediate threat to life or property, as reports submitted may not receive an immediate response. Should such cases arise, to address the urgency of the situation, LISI asks you to refer the matter to your line manager, the emergency services, the relevant authorities or, if necessary, to make a public disclosure.

C. A procedure of the whistleblower's choice:

To report any breach of the LISI Code of Conduct, the whistleblower may make use of the following internal resources:

1. Their line manager (N+1)
2. The N+2
3. The site/plant manager and/or the site HR manager
4. The senior management of the Business Group or central function division
5. The A-SMS (Aviation Safety Management System) Manager (LISI AEROSPACE Division)
6. Division senior management
7. The Group's holding company

It is recommended that the above internal resources be consulted in the order in which they are listed. However, if there is a reason not to use a specific resource – for example, for reasons of confidentiality or if the line manager or director is involved – the whistleblower may bypass one or more of these resources.

The whistleblower also has the option, if they so wish or deem it appropriate, to make a report immediately via the LISI whistleblowing system described below.

The whistleblower may also refer the matter directly to the relevant authorities if they wish (in France, for example: the Defender of Rights, the French Anti-Corruption Agency, or the judicial authorities).

D. How do I submit a report?

LISI has set up a secure system for receiving and processing reports, available on its website (under 'Ethics & AI') and its intranet ('LISI Ethic-Line', under 'Governance, Risk and Compliance'), using the services of a third-party company specialising in the collection and processing of reports. This system allows reports to be submitted:

- **in writing:** the whistleblower may provide details of their report, specifying the entity concerned, the individuals involved, the date of the events described, the duration of the incident, any witnesses, etc. The whistleblower may choose to remain anonymous or not; they may provide an email address to enable them to follow the progress of the investigation, even if they have chosen to remain anonymous (this address will therefore not be disclosed to members of the Ethics Committee). This platform also facilitates written communication with members of the Ethics Committee in the whistleblower's own language.
- **Verbally:** the whistleblower is put in touch with an operator from the third-party company who speaks their language and can then raise a concern following a standard interview guided by a form similar to that used for the written procedure. They may also request anonymity and, if they wish, provide details enabling contact with a member of the Ethics Committee. If anonymity is requested, all communications between the whistleblower and the member of the Ethics Committee are conducted anonymously for both the whistleblower and the member of the Ethics Committee.

The Ethics Committee comprises the Group Secretary General, the Group Human Resources Director and the Group CSR, Risk and Compliance Director.

The reporting system allows reports to be made in each of the languages of the countries where the Group operates.

E. Can the person making the report remain anonymous?

Anonymous reporting is not part of the LISI Group's culture and is not encouraged. It remains possible, however, if the reporter so chooses. It may also be offered from the outset if required by local legislation. It should be noted, however, that anonymous reporting makes it more difficult to understand and investigate the facts reported.

F. What protection and confidentiality measures are in place for the person making the report?

LISI has a no-retaliation policy and does not tolerate any form of reprisal against a person who has reported a breach of its Code of Conduct in good faith.

The person making a report in good faith is therefore assured of protection against any direct or indirect reprisals. If they are an employee of the LISI Group, for example, they may not be dismissed, disciplined or discriminated against in any way for reporting facts in accordance

with the whistleblowing procedure. The internal system offers a strict guarantee of confidentiality. No disciplinary action relating to the report will be taken against the person making the report, provided that they acted in good faith.

The LISI Group undertakes to take all necessary measures to protect the identity of persons making a report, as required by law. The identity of the person making a report may not be disclosed to the person or persons concerned by the report without their prior written consent.

The report will be treated in strict confidence, as will any subsequent investigations and reports, subject to obligations arising from the law or applicable legal proceedings.

The LISI Group guarantees the strict confidentiality of the person making the report, the facts forming the subject of the report and the persons concerned. To this end, the Ethics Committee is authorised to disclose this information only to those with a strict need to know, who are themselves bound by a duty of confidentiality, for the purposes of assessing and handling the report, in particular with regard to decisions to be taken by management on the action to be taken and the persons to be consulted in order to carry out the necessary checks, within the limits reasonably necessary to comply with the legal obligation of confidentiality regarding the report.

This non-retaliation policy extends to facilitators and those close to the whistleblower, in accordance with applicable local legislation or French law²

G. What protection is afforded to the person or persons named in a report?

Any LISI Group employee who is the subject of a report is presumed innocent until the allegations made against them have been substantiated.

Following a preliminary review of the report, they will be informed of the allegations against them so that they may exercise their rights. This information, provided securely via the internal system set up by the LISI Group, will specify the following: the allegations against them, and the procedures for exercising their rights of access, rectification and objection regarding their personal data.

Any information capable of identifying the person implicated in a report may not be disclosed, except to the judicial authorities, until the validity of the report has been established.

These commitments apply even in the event of disclosure to third parties, provided that such disclosure is necessary solely for the purposes of verifying or processing the report.

H. How are reports processed?

The final stage of the reporting process involves the reporter setting a password that allows them to track the progress of their report, as well as any correspondence with the Ethics

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Committee. At this stage, they are also provided with a report reference number, which corresponds to the case's tracking number. This report reference number and the password set allow the reporter to access the reporting platform, which serves as a channel for communication between the reporter and the Compliance Committee throughout the investigation process. The whistleblower may then provide any facts, information or documents, regardless of their form or medium, that may support their report, where such evidence is available.

An email is sent to the whistleblower within a maximum of 24 hours (working days) confirming receipt of the report; this email also appears as a message on the reporting platform, which includes a messaging-style platform for written communication.

The Ethics Committee first assesses the admissibility of the report in accordance with the criteria set out in paragraph B of this document and considers the appropriate action to be taken in response to the report. If the report is deemed inadmissible or unverifiable, the whistleblower is informed and the report file is destroyed without delay.

At the end of the investigation, whatever the outcome, a formal, reasoned decision is sent to the whistleblower by the Ethics Committee, including in the event of the closure of all admissibility or verification proceedings.

In accordance with Decree 2022-1284, the whistleblower shall be informed of the measures envisaged or taken within a maximum of three months from the date of acknowledgement of receipt of their report, even if the investigation continues beyond this period."

I. Monitoring and archiving policies adopted:

Data relating to reports is retained, archived and destroyed in accordance with the legal and regulatory provisions in force.

Where disciplinary or legal proceedings are brought against the person concerned or the author of a frivolous report, the data relating to the report is retained until the proceedings have concluded.

J. Method of disseminating the procedure:

This procedure is published on the LISI Group's website and intranet.