



# Ethics charter

Edition 2024







## ETHICS CHARTER

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# ARESIA ETHICS CHARTER

This charter (hereinafter referred to as the «Ethics Charter») outlines the ethical commitments and responsibilities in conducting business and activities by staff members of the various ARESIA companies, whether they are employees, managers, or collaborators of any kind.

Relationships within ARESIA and with stakeholders are extremely important. These are either public or private parties, French or foreign, individuals, groups, companies, or institutions. They have all kinds of contacts with ARESIA and/or have interests in its activities. ARESIA conducts its activities within the framework of the rules and principles of the market economy, upon which fair competition is based.

## FOREWORD

Respect for the laws in force, and the spirit of trust and cooperation, are the ethical principles followed by ARESIA and from which ARESIA draws its inspiration in order to position itself as an effective and loyal competitor in the market. The objective is to improve client satisfaction, provide added value to shareholders, develop employee skills, and promote professional development. Being convinced that one is acting in the interest of ARESIA should not justify behaviour that is contrary to these principles. Consequently, everyone who works for ARESIA, without distinction or exception, undertakes to respect these principles and to ensure that they are respected, within the scope of their own duties and responsibilities. By virtue of this commitment, all parties maintaining contractual relations with ARESIA must act towards the company according to rules and policies based on the same values.

ARESIA feels it is appropriate and necessary to adopt and publish an ethical charter describing the values to which all managers, employees, and collaborators at all levels must adhere, accepting the legal consequences in the event of a violation of these values. It emphasises behaviour and ethical standards requiring each individual to act with the utmost integrity and to avoid any situation of conflict of interest.

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**These principles are directly complementary to the Group's values:**

**Trust - Respect - Commitment - Exemplarity - Responsibility**

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It is also the management's responsibility to amend, harmonise, and update the Code of Ethics, in particular to ensure that it remains in line with current laws and commonly accepted principles in the aviation industry.

# ARESIA ETHICS CHARTER

## 1. GENERAL PRINCIPLES

### COMPLIANCE WITH LAWS AND REGULATIONS

ARESIA operates in full compliance with the laws and regulations in force in the countries in which it operates, in accordance with the principles established by the ethical charter and the procedures set out in internal memoranda. This also includes compliance with the rules of competition in national and international markets.

All persons working for ARESIA shall act in an exemplary manner as an inherent attribute of conducting the business of their company. Relations between the authorities and those working for ARESIA shall be based on absolute impartiality, transparency, and cooperation, in full compliance with all applicable laws and regulations, and in accordance with their institutional roles.

### RULES OF CONDUCT

All activities of those working for ARESIA must be carried out with due professionalism, respect, and managerial impartiality in order to uphold ARESIA's image.

The behaviour and relationships of all persons working for ARESIA, irrespective of their title, inside or outside the company, shall be guided by impartiality and mutual respect. In this context, managers must be the first to set an example for all ARESIA staff by complying with the principles of the ethical charter, the procedures and rules of the company when carrying out their responsibilities, communicating them to employees and encouraging them to propose updates whenever necessary.

The management team strives to propose and execute the projects, investments, and industrial, commercial, and managerial actions deemed necessary to preserve and strengthen the Group's economic, technological, and professional assets.

With regard to its actions and choices, ARESIA also guarantees to the audit and internal control bodies, as well as to the supervisory authorities, to carry out the most complete and effective control procedures possible.

## 2. HUMAN RESOURCES AND RECRUITMENT POLICY

### MAIN REQUIREMENTS

Human Resources are key to ARESIA and to its competitiveness in the market. For this reason, ARESIA requires its managers, employees, and collaborators to demonstrate trust, respect, responsibility, professionalism, exemplarity, and commitment, all of which are key conditions for achieving its objectives.

### RECRUITMENT POLICIES

In order to contribute to achieving ARESIA's development objectives and ensuring that these objectives are pursued by each individual in accordance with the principles and values that drive it, ARESIA's policy is to select each future employee, consultant,

## ARESIA ETHICS CHARTER

or collaborator of any kind taking into account the values and characteristics mentioned above. Adherence to the Group's operating principles, in particular this Code of Ethics, is a prerequisite to all recruitment. During the selection process, carried out in accordance with the principle of equal access to employment and without discrimination of any kind, such as gender, sexual preference, politics, among others, and respect for the private life and opinions of the candidate, ARESIA will ensure that it hires people for the positions it actually needs, excluding any form of favouritism.

### CAREER DEVELOPMENT

As part of the development of the relationship between the employer and the employee, ARESIA is committed to providing and maintaining the conditions necessary for improving the skills and knowledge of each employee in accordance with the values mentioned. To this end, the policy focuses on acknowledging merit and equal opportunities, establishing programmes for continuous training and the acquisition of new skills. Employees are therefore encouraged to develop and improve their skills, as well as acquiring new abilities and knowledge.

## 3. COMPANY REPRESENTATION

Only those persons authorised by General Management may speak on behalf of ARESIA. The behaviour of each employee: personal ethics, integrity, professionalism, and commitment are essential to the effectiveness and reputation of ARESIA.

Accordingly, each employee must:

- Act with the interests of ARESIA in mind;
- Reflect its values in their professional behaviour;
- Not speak or write on behalf of ARESIA without permission;
- Ensure that there is no confusion between the employee's personal views or interests and those of ARESIA. For example, employees should never use company letterhead to express personal views, deal with personal matters, or in the same way via the company email account.

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## 4. FINANCIAL AND CORPORATE DOCUMENTS

In accordance with their duties, employees have an obligation to ensure that all information contained in ARESIA's financial and other documents is accurate. This is one of the keys to ARESIA's success, essential to the honest, lawful, and efficient conduct of our business. It is particularly paramount to provide our shareholders with transparent, accurate, and reliable information. Hence, each employee.

- Contributes to ensuring all information contained in financial and business documents is accurate at all times;
- Maintains these documents in a safe place and complies with archiving guidelines;
- Cooperates with the duly appointed internal and external auditors and operates within their scope.

## 5. USE OF COMPANY ASSETS

Material resources are designed to enable employees to achieve ARESIA's business objectives. Misuse or waste of such resources, including working time, is detrimental to ARESIA's operational and financial performance.

Employees:

- Must make use of ARESIA's resources for business purposes and not for personal use;
- Preserve and protect the company's resources preventing them from being lost, damaged, misused, wasted, loaned, transferred, or otherwise disposed of without authorization;
- Must not appropriate material and immaterial resources belonging to ARESIA, such as documents or computer files, regardless of the medium.

## 6. CONFIDENTIALITY

ARESIA's know-how forms its most valuable asset. The unauthorised disclosure of confidential information can be detrimental to ARESIA. Employees must ensure that any information that is not public remains strictly confidential. They must therefore protect it against any disclosure. The same applies to all those having access to confidential information relating to business partners.

In addition, each employee would be held personally criminally liable, in accordance with Articles 121-2, 411-1 to 411-11, 413-9 to 413-12, 414-7 to 414-9 of the French Criminal Code, in the event of compromise or risk of compromise of information relating to national defence secrets.



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Each employee should:

- Strictly limit the disclosure of confidential or sensitive information to only those individuals having a legitimate need to know, including internally, and this in their own interest;
- Keep securely all confidential client and supplier data, whether in paper or electronic format;
- Prevent any disclosure of confidential information to persons outside ARESIA, including family members of employees;
- Avoid discussing or working on confidential information in public places where conversations can be overheard and data security compromised;
- Return all confidential information, including any copies, upon departure from the company.

### 7. GIFTS AND INVITATIONS

Exchanging gifts or invitations can be part of a cultural tradition contributing to mutual understanding and improving business relations, although this can also generate conflicts between personal interests and professional obligations.

If employees receive gifts or invitations, they should observe the following principles:

- Strictly refuse to receive or give monetary gifts;
- Refuse any invitation or disproportionate gift from a partner, except in special circumstances such as during the holiday season;
- Ensure that gifts and entertainment offered are appropriate and consistent with ARESIA's values;
- When establishing a new business relationship, ensure that the parties are aware of ARESIA's policy on gifts and entertainment. Similarly, it is important to be familiar with the other party's policy in this area.
- Inform your line manager of any gift or invitation related to your professional activity
- Absence of consideration

### 8. FIGHT AGAINST CORRUPTION AND INFLUENCE PEDDLING

Corruption and influence peddling are prohibited and are incompatible with ARESIA's values of respect for laws and regulations. They represent a reputational and image risk vis-à-vis clients, suppliers, employees, and other stakeholders. Commissions or amounts paid without contractual and/or legal justification are a form of corruption. They are illegal, especially if public officials are involved. Most countries also prohibit «facilitation payments». These are payments made to third parties in order to carry out or expedite certain administrative formalities such as permit applications or customs clearance.

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Each employee is required to:

- Never make, offer, or promise cash payments or services to civil servants, public officials, or persons in a position to influence them;
- Never knowingly make such payments through third parties;
- Ensure that your line manager is informed immediately in the event that such payments are solicited and that the request is fully documented and that an alert is made in accordance with the procedure for the handling alerts and whistleblowing.

## 9. CONFLICTS OF INTEREST

Employees must avoid situations in which their personal interests could conflict with those of ARESIA. The mere appearance of a conflict of interest could damage ARESIA's reputation as well as that of its employees. In the event of a potential conflict of interest, all employees are obliged to:

- To disclose the situation in order to enable a thorough analysis of the matter, and to reveal all the facts which ARESIA will be free to assess and draw the appropriate conclusions from;
- To inform their superiors in the event of a potential conflict of interest that gives or may give the impression of influencing their judgement and actions - for example, if a relative works for a supplier;
- Not hold a position, office, or financial interest in any competitor organisation, client, supplier, or business partner of the company insofar as the employee's duties within ARESIA enable them to have an influence on the relationship.

## 10. ENVIRONMENTAL ACCOUNTABILITY

ARESIA has a high respect for the environment and strives to minimise its ecological impact. Many of the activities involved in the production of our products can have a direct effect on the environment. It is everyone's responsibility to try to reduce this impact where possible. In this area, everyone's behaviour makes a difference.

Each employee must:

- Contribute to ARESIA's environmental initiatives;
- Encourage the use of recyclable material and the development of biodegradable packaging;
- Reduce the number of business trips to the strict minimum;
- Save energy and water, reduce waste production, and ensure that all material is either recycled or disposed of in a responsible manner;
- Take all necessary measures to ensure compliance with ARESIA's environmental guidelines and to comply with the regulations in force;
- Immediately report any incidents to your line manager, such as unusual spills or emissions into the water or air, pollution, and the like.

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## 11. SAFETY OF INDIVIDUALS

ARESIA pays particular attention to strictly limiting the risks to personal safety. It is everyone's responsibility to try to reduce them further, where possible. In this area, everyone's behaviour makes a difference. Each employee must:

- Contribute to ARESIA's safety initiatives;
- Promote the use of personal safety protections during operations;
- Take all necessary measures to ensure compliance with ARESIA's safety guidelines and to comply with the regulations in force;
- Immediately inform your line manager of any accident.

## 12. PRODUCT SAFETY AND QUALITY

Product safety and quality have long been of paramount importance to ARESIA. The high performance, quality, and safety of the products are proof of ARESIA's commitment and respect for its clients. This enables ARESIA to gain the trust of its customers, build brand awareness, and ensure leadership in its field.

The ARESIA Group companies are committed to marketing products that have demonstrated their effectiveness and reliability, guaranteed by rigorous testing. Each ARESIA employee must pursue the goal of achieving total product quality, from design to distribution, even after the product has been put on the market.

Employees involved in product development, marketing, manufacturing, sales, and service activities must:

- Comply with all laws, regulations, and procedures relating to the development of new products;
- Encourage free and open dialogue on issues related to the product safety for its users, so that none of these issues are overlooked;
- Ensure that the highest standards of quality control are implemented at every stage of the production process;
- Ensure that all client complaints are passed on to the relevant departments and followed up;
- Quickly address any potential issues regarding product safety, reliability, and quality control.
- Follow the quality procedures that are relevant to the activity being carried out.

The goods and services offered by ARESIA are produced, supplied, and maintained in accordance with the criteria of excellence of its own sector of activity and in accordance with the rules, laws, and regulations in force with regard to quality, work, health protection, employee safety, and environmental protection.

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## 13. IMPARTIAL SELECTION AND TREATMENT OF SUPPLIERS

Through this charter, ARESIA intends to share its commitment with its suppliers and subcontractors, major players in its success, and to encourage their involvement in sustainable development.

ARESIA's relationships with its suppliers go beyond the simple purchase of goods and services. They are essential to its long-term success. ARESIA is also assessed according to the quality of its relationships with its suppliers. In particular, ARESIA is closely monitored in terms of its selection criteria and the commitment of its suppliers to conduct their business in a responsible manner.

ARESIA favours supplier relations centred on:

- Quality, the overall performance of the products or services provided, and the ability to ensure continuous improvement;
- The deployment of developments and innovations that enhance the quality of ARESIA's operations or client offerings;
- Long-term relationships, leading, where appropriate, to establishing genuine partnerships;
- Financial fairness, management of risks that could be detrimental to the interests of the parties, such as excessive dependence of a supplier on ARESIA or vice versa on a technical or technological level.

ARESIA guarantees all suppliers:

- Sincerity and fairness of the information provided to suppliers;
- The information given to suppliers not selected, specifying the reasons for turning down their bids, taking care not to violate the rules of confidentiality;
- Honouring contracts, promises, and commitments, including payment deadlines;
- Respect for independence and individual identity; the Group will not abuse its position in the market to obtain preferential treatment;

The companies of the ARESIA Group, likely to supply the goods or services sought, shall be consulted. In the common interest of the Group and at the request of General Management, purchasing within the Group may be preferred or even imposed.

All employees in contact with suppliers should:

- Encourage supplier selection on the basis of tenders and, for suppliers not selected, provide them with sensitive and objective feedback;
- Ensuring that the company's general terms & conditions of purchase and payment, including our ethical standards, are understood and adhered to by all our suppliers, wherever they may be located;
- Helping suppliers meet our expectations, while having the fortitude to terminate a relationship with a supplier that repeatedly fails to meet such standards;
- Protecting suppliers' confidential information as if it were the company's own, in particular ensuring their copyright and intellectual property rights are respected.

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## 14. COMPETITION

ARESIA is respectful of all stakeholders in its business environment, including its competitors.

Each employee should:

- Avoid all contact with competitors regarding confidential matters;
- Refrain from establishing exclusivity agreements that require a company to sell to or buy from Group companies only, before consulting legal counsel on whether there is a risk of abuse of dominance;
- Refrain from disparaging competitors - in particular, misrepresenting their products or services;
- Promptly inform your management if you receive or inadvertently use confidential or proprietary information about competitors of which you or third parties are the rightful owners;

Only obtain information on competitors by legal means, always clearly identifying yourself as an ARESIA employee.

## 15. DISSEMINATION OF AND COMPLIANCE WITH THE ETHICS CHARTER - WHISTLEBLOWING RIGHTS

ARESIA undertakes to ensure that all managers, employees, collaborators of any kind, commercial and financial partners, consultants, and suppliers are aware of the ethical charter, the internal memos, and their updated versions, and are fully acquainted with them. Failure to comply with them may result in disciplinary measures or contractual penalties.

ARESIA also favours and encourages the contribution of employees in ensuring the respect, knowledge, and implementation of the ethical charter. Each employee contributes to this within the limits of their skills and tasks and exercises, if necessary, their right to blow the whistle, in compliance with the regulations and procedures in force.

Signed in Villeneuve La Garenne, on

Bruno BERTHET, President



# ARESIA ETHICS CHARTER

## ANNEX 1

### SPECIFIC PROVISIONS FOR HUMAN RESOURCE STAFF

Each staff member in the Human Resources Department may have access to individual personal data of employees such as marital status, addresses, and so on, as well as professional personal data including salary, disciplinary records, and the like.

This data is by nature confidential. Each employee requiring access to it for human resources management purposes must keep this information strictly confidential and only disclose it to a third party if the person needs to know the content for a proven legal or management purpose.

## ANNEX 2

### SPECIFIC PROVISIONS FOR PROCUREMENT STAFF

Every employee involved in the purchasing process and in contact with a supplier must adhere to these standards:

#### FAIRNESS, TRANSPARENCY

The purchasing function requires the active participation of various departments within the company along with a strong coordination of the purchasing departments within the Group according to the following principles:

- Active and loyal participation of the various stakeholders during the preparation and implementation phases of the purchasing policy;
- Respect for the various levels of the organisation, entities, BUs, and the Group, for the work of the buyers, thus avoiding redundancy and loss of synergies.

#### RESPONSIBILITY, PROFESSIONALISM

All employees are bound by a permanent obligation to act in a reserved manner. They must show restraint in public, it being understood that in their purchasing activities they represent the Group.

Consequently, all persons involved in the purchasing process must:

- Avoid situations involving conflicts of interest and be totally impervious to any attempt at manipulation by suppliers or candidates for a call for tenders;
- Be impartial, objective, and independent;
- Be able to talk frankly with colleagues and supervisors about the appropriate course of action.

# ARESIA ETHICS CHARTER

## ANNEX 3

### CORRUPTION RISKS - EXAMPLES OF SITUATIONS

In the course of their work, ARESIA employees may encounter instances of corruption. Examples of situations in which corruption may occur are listed below. They take into account the risks that may arise in relation to ARESIA's activities. Other examples are presented during training sessions held for ARESIA employees. Employees should contact their line manager and/or the ARESIA Compliance Committee and not be left alone to deal with these types of situations.

#### **EXAMPLE 1: Gifts and invitations**

*A colleague would like to send a case of vintage wine to a client at a time when one of the Group's companies is being consulted in the context of a call for tenders. Would this be allowed?*

No. A case of vintage wine is too expensive a gift. This type of gift should be avoided, especially during a call for tenders. In addition to gifts at the time of or during a tender or other type of negotiation, gifts with the aim of obtaining an undue advantage, gifts of an insulting nature, contrary to human dignity, unlawful or contrary to the customs of the countries or organisation concerned, as well as gifts in the form of cash are prohibited.

#### **THE PROPER BEHAVIOUR TO BE ADOPTED**

Maximum transparency is required. Any proposal for gifts and/or invitations involving anything other than small amounts, whether from a Group employee or a third party, and especially for the benefit of public officials, must be submitted to one's line manager and/or the Compliance Committee.

#### **EXAMPLE 2: The client relationship via a public or private contract:**

*A major client of the Group informs a subcontractor of the Group that if the Group pays a certain amount of money, the Group will be awarded the contract. The subcontractor offers to pay the amount to the Client instead of the Group. Is this an acceptable practice?*

This type of payment, which is intended to improperly influence a decision (the award of the contract), is an outright bribe. Payments of this kind are illegal. In addition to the payment of an amount of money, gifts, a promise of employment, and patronage actions in particular can be qualified as an «undue advantage», insofar as they seek to promote the winning of a contract and obtain favours from a client. The promise of an undue advantage may be made via a contract whose subject matter is in itself lawful. This is the case, for example, for a commercial assistance contract, a subcontracting contract, or a contract for the provision of services where the services are typically overpriced. The fact that a subcontractor is involved does not change

\* The Group Compliance Committee is composed of the Chairman, the General Manager, the Head of Human Resources, and the Group General Counsel. Its mission is to ensure the promotion of a culture of integrity, to oversee the implementation of measures to prevent and combat corruption, and to make sure that the Group's employees are properly supported in their projects.



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the illegality of such a payment. Be aware that the beneficiary of the advantage may be the client's representative, but also a relative, a shell company, and the like.

It should be noted that if the promise or payment is made and one of the Group's representatives is only merely aware of it, the relevant Group entity and its manager may also be held liable.

### THE PROPER BEHAVIOUR TO BE ADOPTED

- Point out and explain the Group's rules;
- Request that the Group Ethics Charter be annexed to contracts and insert a «prevention of and fight against corruption» clause in contracts;
- Obtain information on the rules applicable to third parties, co-contractors, subcontractors, and clients;
- Note the risks of sanctions, including criminal charges, that may be incurred by the individuals and companies concerned;
- Ask the person proposing the undue advantage for a written document signed by their superior; this should discourage them;
- Inform your line manager and/or the Compliance Committee;

### EXAMPLE 3: Engaging a service provider

*A colleague advises hiring a local «consultant» to help the Group clear some of the equipment to be shipped through customs. The consultant asks for a large advance payment, explaining that this money should «give the green light» for the shipment. Is this method allowed?*

No, this type of payment could be considered a bribe in disguise. It is not allowed. The Group maintains a very strict due diligence procedure with regard to recruiting consultants. This includes monitoring their activities to ensure that no improper payments are made on behalf of the Group by persons working for the Group.

The services rendered must be legal, legitimate, correspond to a real need, comply with internal rules, and be at a market price consistent with the services provided. Excessive remuneration or overpriced invoices should always raise the suspicion of a hidden commission.

### THE PROPER BEHAVIOUR TO BE ADOPTED

The integrity and reputation of the service provider should always be checked and the contract should be well drafted:

- Detail the services expected, including deliverables, and performance obligations;
- Specify clear payment terms;
- Annex the ARESIA Ethics Charter to the contract;
- Monitor the services;
- Include an «audit» clause to enable the services to be audited;

Increased vigilance is required when dealing with intermediaries (consultants). These contracts must systematically be validated by General Management and the Compliance Committee.

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### EXAMPLE 4: Facilitation payments

*A customs officer in a foreign country where corruption is rife demands payment of a so-called «special fee» to obtain a faster clearance. Should this tax be paid?*

Unless a staff member's freedom of movement or security is jeopardised, such payments, although common in some countries, are prohibited.

### THE PROPER BEHAVIOUR TO BE ADOPTED

- The content of the Ethics Charter and the illegality of the request should be pointed out and explained;
- Ask them to put their request in writing and sign it (this should discourage them), also signed by an authorised representative on official letterhead.
- Contact your line manager and/or the Compliance Committee

### EXAMPLE 5: Conflicts of interest

*An employee's brother has a shareholding in a company that is a supplier to the Group. Should this relationship be reported?*

Yes, this relationship could give an appearance of a conflict of interest. Even if there is no direct conflict, the appearance of a conflict may still cause problems for the employee concerned and the Group.

A conflict of interest arises if the personal interest of a member of staff conflicts with the interest of the Group. This is the case, for example, when selecting suppliers, or being involved in a hiring or promotion decision concerning a close relative.

### THE PROPER BEHAVIOUR TO BE ADOPTED

The Purchasing Department, Human Resources, and the employee's line manager should be informed of the existence of this relationship and complete the appropriate form.

### EXAMPLE 6: Political contributions, patronage, and sponsoring

*A client asks you to sponsor their daughter's football team. Is this type of sponsorship allowed?*

Such sponsorship would seem suspicious. No contribution can be considered if the Group is in the process of concluding a contract with the applicant's company, for example. The purpose of the offer or request for a donation, sponsorship, or patronage must be legitimate.

### THE PROPER BEHAVIOUR TO BE ADOPTED

The request should systematically be submitted to General Management and the Compliance Committee. The use of the contribution must be specified in the agreement, as well as the beneficiary, and be recorded in the company accounts.

## ANNEX 4

### PROCEDURE FOR HANDLING WHISTLEBLOWER ALERTS

#### Whistleblower protection regime

Any individual who reports or discloses, **without direct financial consideration and in good faith**, information concerning a crime, an offence, a threat or harm to the general interest, a violation or an attempt to conceal a violation of an international commitment regularly ratified or approved by France, of a unilateral act of an international organisation taken on the basis of such a commitment, of European Union law, of the law or of the regulations shall benefit from the system of protection of whistleblowers against any sanction, dismissal, or discrimination and they shall benefit from the system of protection provided for by the law.

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The report must be submitted to the Compliance Committee, by email to the following address: [cc@aresia.com](mailto:cc@aresia.com) using the form attached in Annex 5

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#### How the procedure works

The whistleblower must send the facts, information, and documents by email in order to substantiate their alert and complete the attached form. The Group Compliance Committee will then send the whistleblower an acknowledgement of receipt email indicating the date on which they will be informed of the action taken on their alert.

The Group Compliance Committee must investigate the whistleblower's case as soon as it receives the alert. An «ad hoc» committee made up of a limited number of people having expertise on the subject to be dealt with may have to be created to facilitate the enquiry.

Each member of the Group Compliance Committee signs a strict confidentiality agreement. They undertake not to reveal to anyone, during the investigations, any information relating to the facts reported, documents submitted, information and identities of the whistleblower, and of the persons referred to in the alert.

It is recalled that such data is processed in compliance with the Group's rules applicable to the processing of personal data.

**Whistleblowers must identify themselves using the form below. In return, their identity is kept strictly confidential in accordance with the law in force.**

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Each alert gives rise to a preliminary assessment that is treated confidentially by the members of the Group Compliance Committee. This is in order to determine before the start of the investigation whether it falls within the scope of the procedure. This would not be the case if the alert was not of a serious nature, constituted an abusive or slanderous denunciation, was made in bad faith, or with the intention of causing harm, etc.

Any alert falling outside the scope of application of the system will be discarded. The originator of the alert will then be notified in writing.

If, on the other hand, the facts reported fall within the scope of the alert procedure, the alert is dealt with immediately. An investigation will be opened by the Group Compliance Committee, which will inform the persons concerned. The Group Compliance Committee may need to interview the whistleblower to obtain their perspective and to review the facts of the alert. The Group Compliance Committee will also interview the persons concerned by the alert to ascertain their points of view.

After analysis, the Group Compliance Committee will conclude the case and inform the persons concerned of the follow-up.

**In the event of a finding of unethical behaviour and/or non-compliance with the laws and regulations in force, disciplinary and/or legal proceedings may have to be initiated.**

The processed data that is the subject of the alert shall be either destroyed, retained, or archived in accordance with the General Data Protection Regulation. As follows:

- Immediate destruction if the data does not fall within the scope of this procedure;
- Destruction within two months of receipt of the alert, if the alert is not subject to a procedural or judicial follow-up;
- Retention until the end of the procedure if proceedings are initiated, whether disciplinary or judicial, against the person targeted by the alert or the whistleblower themselves in the case of an «abusive» alert.

Whistleblowers may also address their alert either to the judicial authority (public prosecutor), the administrative authority (prefect), professional bodies, or the Human Rights Defender. Follow-up to the alert may be given as indicated here, in particular in the event of disagreement with the employer on the merits of the alert transmitted or in the absence of follow-up.

[Whistleblower protection in companies | service-public.fr](#)

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## ANNEX 5

### FORM TO BE COMPLETED BY THE WHISTLEBLOWER

and recorded in the register kept at the disposal of staff representatives

CONTACT DETAILS OF THE WHISTLEBLOWER*
LAST NAME AND FIRST NAME:
ADDRESS:
EMAIL:
PHONE NO:
POSITION:
CONTACT DETAILS OF LINE MANAGER*

\*The above contact details are intended to enable the alert to be processed

PRELIMINARY DECLARATION OF THE WHISTLEBLOWER	YES	NO
I certify having read and understood the Group Ethics Charter		
I certify that I previously contacted my line manager to inform them of my alert without success*		
I certify that I have personal knowledge of the facts reported below.		
I certify that I have no personal relationship with the person concerned by the alert**		
DESCRIPTION OF THE FACTS UNDERLYING THE ALERT/REPORT		
Be precise when indicating the places, dates, names, and surnames of the persons mentioned, and specify the possible consequences and any other information useful for assessing the alert.		

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I certify on my honour that the information provided on this form is accurate and that I am acting in good faith and in a spirit of disinterest.

Date:

Place:

Signature

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TO BE COMPLETED BY THE GROUP COMPLIANCE COMMITTEE:

RECEPTION DATE OF THE ALERT		
ADMISSIBILITY OF THE ALERT	YES/NON	
REPORT OF THE INTERVIEW WITH WHISTLEBLOWER	Attachment	
REPORT OF THE INTERVIEW OF THE SUSPECTED PERSON	Attachment	
REPORT OF THE WITNESS INTERVIEW	Attachment	
FOLLOW-UP (delete as appropriate)	UNFAVORABLE/ CLOSED WIT- HOUT ACTION	FAVOURABLE/ PROCEEDING
COMMENTS		

\*NB: if your line manager is the subject of the alert, you can escalate your alert to their line manager.

\*\*If you have a personal relationship with this person, please specify.





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