



What guarantees are offered to the issuer?

IT IS IMPORTANT TO PROTECT / SUPPORT ANY GOOD FAITH ISSUER OF AN ALERT, WHICH IS WHY 3 GUARANTEES ARE FORESEEN:

1) Confidentiality of identity

The Compliance Officer will work to ensure the privacy of the issuer's identity and to the full extent possible, the information and documents that have been provided remain confidential. In practice, the issuer's identity is not revealed to those possibly implicated in a breach of Ethics (even if they specifically ask to consult, or obtain disclosure of, the issuer of the ALERT). Exception being for specific requests received from recognized external authorities (i.e.: judicial, administrative ...) who hold a legal right to have access to such information.

In an exceptional case, where it could become necessary to lift confidentiality, the Compliance Officer will issue a written notification to the issuer, and explain the need to lift confidentiality. Should the issuer continue to insist on confidentiality, the issuer's identity will remain confidential, and the Compliance Officer will inform/consult with members of the Ethics Committee to determine if the investigation is to continue, and if so, the best method of proceeding with the analysis of the Alert. In such a case, the issuer will be advised of the related decision.

2) Information related to the alert

Where an employee, in good faith, alerts on practices considered suspicious, he/she exerts a fundamental public freedom: freedom of expression. Therefore, the issuer is entitled to know the results of this exercise of that freedom. Therefore, the "Issuer" may request the Compliance Officer to provide a restitution (which at the discretion of the Compliance Officer, may be oral or written) of the findings related to the ALERT. However, the specific identity of any other individuals that may be eventually named in the analysis typically will not be disclosed to the "Issuer" during any such restitution.

Any documents and information, regardless of medium, obtained in connection with an alert are typically destroyed in accordance with applicable retention rules/directives. Should an Alert not be followed by the initiation of a disciplinary, or legal, procedure, within two months of the Compliance Officer's Closing Report; the related information will be destroyed within the electronic Alert system or removed to a free-standing archive, which has an access specifically limited to the Compliance Officer or the Compliance Manager. Should an Alert be followed by the initiation of a disciplinary, or legal, procedure, related information will be retained until such procedure is formally closed by the appropriate authorities. The related information will then be removed to the free-standing archive, which has an access specifically limited to the Compliance Officer or the Compliance Manager.

The issuer, up until the time that the Alert is closed by the Compliance Officer, has a right to access and correct the documents/information that he/she has provided. This right can be exercised by sending an email to ethics@systra.com.



3) Protection against potential retaliation

Un lanceur d'alerte qui, de bonne foi, émet une alerte dans le cadre An issuer, who in good faith, raises an ALERT within the SYSTRA Ethics Alert Process is not to be:

- Harassed, punished or dismissed for the act of raising an ALERT, nor be;
- Subjected to discrimination directly or indirectly, particularly with regard to; remuneration, training, reclassification, assignment, qualification, professional promotion, transfer or contract renewal, in retaliation for such an ALERT.

This protection is formalized by:

- A systematic notation on the reports provided by the Compliance Officer, which states a formal prohibition to implement, in any way, retaliation against good faith whistleblowers;
- A systematic reminder, to the Management of the entity in which the whistleblower works, that no retaliation will be tolerated as long as the Alert was launched in good faith;
- Intervention of the Compliance Officer, should facts of an unfavorable treatment be duly established, who will take all possible measures to restore the rights of the issuer, regardless of the sanctions that could be incurred by the perpetrator(s) of such a retaliation.

ARE PENALTIES INCURRED FOR MALICIOUS ALERTS?

A bad faith issuer, should this be established, may be punished for potentially causing extensive damage to both the individuals potentially affected by the alert, and to SYSTRA itself.

Therefore it should be emphasized that the raising of a bad faith Alert, such as, for example:

- here the Alert is raised with the intent to unduly harm the reputation of a natural or legal person,
- in a case where an Alert is raised to intentionally provide misleading information

will expose the issuer to potential disciplinary sanctions on the basis of false accusations.



Ethics Alert Process



REFERENCE : PR-01708 EN
version 1



Principles of the Ethics Alert Process

SYSTRA makes available to all employees of SYSTRA Group (SYSTRA and its subsidiaries) throughout the World, an Ethics Alert Process to use for expressing doubt / concern that they may have on an ethical matter.

The Compliance Officer is in charge of this process and remains at the disposal of employees for any related question.

THIS PROCESS HAS FOUR MAIN FEATURES

1) It is optional

The use of the Ethics Alert Process is by no means an obligation for employees. Any potential user remains free to use, or not to use, this option. It is offered as an aid/tool should an employee consider it to be the most appropriate way to address their doubt or concern on an ethical matter.

This Process is not intended to replace the employee's normal management chain (direct supervisors, human resources) or the employees' representative bodies.

2) It is limited to specific types of situations:

- Corruption and influence peddling;
- Conflicts of interest;
- Inappropriate free market competition;
- Accounting and financial fraud (i.e. incorrect recording of expenses, sales, customer payments, etc...);
- Internal or external fraud (theft, deception, breach of trust,...);
- Infringements of intangible heritage (trademarks, patents, copyrights,...);
- Discrimination and harassment.

3) Its territorial scope is unlimited

The Ethics Alert Process is available to all SYSTRA Group employees wherever located. Each Alert will be analyzed on the basis of the applicable law.

4) It is framed by the french based «Commission nationale informatique et libertés» (CNIL)

The Ethics Alert Process respects conditions imposed by the CNIL, which include:

- Confidentiality is provided for the issuer's identity and the documents and information disclosed/provided;
- The treatment of the facts collected and any subsequent distribution;
- The shelf life of personal data;
- Security measures over employee information found within an electronic Alert ;
- The right to access, and modify the personal information collected.



Operation of the ethics alert process

Who can use the Ethics Alert Process?

Any employee of the SYSTRA Group, whatever the nature of their employment, including; apprentices, consultants, and contract or temporary workers.

How to set it in motion?

ALERTS can be sent to the Compliance Officer, as the recipient of Ethics Alerts. In case the Compliance Officer would be missing, the alerts can be transmitted to the compliance manager at the legal department.

Alerts can be transmitted:

- By an email, which is electronically transmitted to : ethics@systra.com;
- Written communication sent to : SYSTRA Compliance Officer, 72 rue Henry Farman, 75513 Paris Cedex, France (it is recommended to add in capital letters the word «Confidential» on the envelope);
- Direct call placed to the Compliance Officer at SYSTRA Group office in Paris, telephone number: 01 4016 6211. In this case, the caller will be asked for his/her contact information (either professional, or personal) as well as an appropriate time to hold any further discussions needed. Typically, further discussions involve obtaining additional information during the analysis of the ALERT, or to provide the "Issuer" with feedback on the findings generated by the ALERT;
- ALERT LINE, electronic transmission within the SYSTRA IT system.

To facilitate treatment, the ALERT should provide appropriate details on the alleged breach of ethics, including any available relevant documents (i.e.: letters, emails, SMS, accounting or financial documents, contracts, invoices, reports, written testimonials, certificates, ...).

The issuer shall refrain, in all circumstances, from revealing to others the nature of the allegations and the identity of any natural, or legal persons, targeted in the ALERT. Exception being the case where this information would be formally required by any police, court, administrative authority or a «Human Rights Protector».



How does the compliance officer process the alert?

As a general practice, «Anonymous» alerts will not be responded to by the Compliance Officer

By way of exception, an anonymous Alert could be treated if the following requirements are met:

- That the seriousness of the facts is established and factual elements provided are sufficiently detailed, and;
- The treatment of this Alert is surrounded by special precautions, such as a preliminary examination, by the Compliance Officer, of the advisability of analysis within the framework of this Alert process.

When an ALERT is received by the Compliance Officer, an acknowledgement is given (may be verbal or written) along with an opinion on the "merit" of the ALERT.

- Should the Compliance Officer find lack of merit, the issuer will be requested to provide additional information, or to pursue the matter through other channels (i.e. SYSTRA Human Resources, 3S Director...);
- Where merit is found, the Compliance Officer undertakes analysis and, depending on the circumstances, can advise the Group Ethics Committee, and/or the compliance manager at the legal department. The type analysis performed (i.e.: interviews, data research, consultations with experts ...) will depend on the context/ subject matter of the ALERT. During analysis, the Compliance Officer will typically have contact with various individuals (i.e.: SYSTRA employees, Clients, Suppliers ...) in order to obtain pertinent information as well as appropriate data / documentation. Where deemed necessary, the Compliance Officer may also rely on support assistance from appropriate internal/external resources (Legal, Human Resources ...);
- Individuals directly affected by an ALERT will be appropriately informed (either by the Compliance Officer or their Line Management) that an ethical matter has been raised (the name of the issuer remains confidential). They will be able to exercise their rights with regard to the French «Loi Informatique et Libertés» law. Should provisional measures be necessary to prevent the risk of destruction of evidence, the appropriate individuals will be given clear instructions on the data/documents that must be retained, and the time periods involved;
- For discrimination and harassment matters, the Compliance Officer will refer the matter to the SYSTRA Group HR Officer for treatment, who is charged to offer the same «Guarantees» as described below.

As soon as practical, the Compliance Office will close the ALERT by issuance of a finding (may be written or verbal) to the «Issuer» and SYSTRA Management that has been involved (to include the Ethics Committee). This finding will pronounce on the merit of the alert, and provide any recommendation, as needed, to correct/prevent reoccurrence of the matter raised.