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VUSION

# Ethical Alert Policy

SES-imagotag

Last Update: October 2021

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**This policy sets out how  
SES-imagotag will support you  
so that you can safely express  
your concerns, know who to  
contact, how to make a report  
and how protected you are as a  
whistleblower**



I/

## Introduction

At SES-imagotag, we are committed to the highest **levels of ethics and integrity** in the way that we do business. We understand that this is crucial to our continued success and reputation.

SES-imagotag Values and principles of our Code of Ethics guide our everyday conduct.

We have a professional responsibility to speak up and report unethical behaviour.

This Policy will be a key to **detect corruption, illegal or other unethical behaviour and manage any situation of infringement of our Code of Ethics.**

SES-imagotag strongly encourages you to speak up if you suspect or witness any suspicious activity or unethical behaviour.

**Every employee of the SES-Imagotag Group, as well as every external or occasional contractor of the Group,** is entitled to use this alert, and is viewed as a positive act that can make a valuable contribution to the company's efficiency and long-term success.

This Policy that has been drafted in accordance with the law n°2016-1691 of December 09<sup>th</sup>, 2016 named « Sapin II Law ».



## II/ Purpose of the Ethical Alert

Protect the interests of the SES-imagotag Group;

Manage unethical situations in a confidential and equitable way;

Control the respect of rules and processes implemented;

Reprimand the violation of a law/regulation that may result in serious harm to the public interest;

Protect the whistleblower.



## III/ Who can report an unethical situation?

You can use this alert procedure and be considered as a whistleblower if you are a current or former partner, director, officer, company secretary, employee, supplier an external or occasional contractor and consultant or a volunteer or you are linked to the SES-imagotag Group activity and you're facing a situation:

- contrary to the rules as set forth in SES-imagotag's Code of Ethics or
- that threatens or prejudices the general interest



## IV/

# Where to send your alert?

### **If you are an employee of a company of the SES-imagotag Group:**

- Report through the dashboard “Ethics” on MyLily or;
- Send an email to: [ethics@ses-imagotag.com](mailto:ethics@ses-imagotag.com).

**If you are an external or occasional contractor** of a company of the group SES-imagotag you can write to us at [ethics@ses-imagotag.com](mailto:ethics@ses-imagotag.com)



## V/

# Content of your alert

These might relate to:

- conduct which is an offence or a breach of the law; or
- racial, sexual, disability or other discrimination; or
- health and safety issue for the public and/or other employees; or
- unauthorised use of funds or other assets; or
- possible fraud and corruption; or
- neglect or abuse of clients.

This list is not exhaustive.

### **Facts personally observed**

The facts must have been personally observed

If your concern relates to your own treatment as an employee, please contact directly the HR Department

### **Your identity**

The ethical alert available on MyLily has been specifically designed so that you can choose to remain anonymous.

The information submitted must be submitted selflessly and in good faith, be articulated impartially and be sufficiently specific to be checked;

You can report any serious concerns that you have about service provision or the conduct of people acting on behalf of SES-imagotag that:

- make you feel uncomfortable in terms of known standards;
- are not in keeping with the Code of Ethics and policies;
- fall below established standards of practice;
- are improper behaviour.



## VI/ Management of your alert

### **Receivability and processing of the report:**

- Your alert will be first transmitted to Marianne Noël, Head of Human Resources and Pascale Dubreuil, Secretary General.
- They shall then decide to transfer it to the relevant department for analysis and investigation;
- You will be informed of the reception of your alert (but acknowledgement of receipt does not equal receivability of the report) If you choose anonymity, please note a feedback is technically impossible.
- We will provide you with feedback, as appropriate on the progress and expected timeframe of the investigation; If you choose anonymity, please note a feedback is technically impossible
- SES-imagotag will notify you once an investigation has been completed but please be aware that SES-imagotag may be unable to disclose particular details or the outcome of the investigation. If you choose anonymity, please note a feedback is technically impossible.

### **In case of no continuation:**

- If no continuation is decided, you will be informed of the closing of your file.
- In this case, the elements of the file of report will be destroyed or filed after having been anonymised in the applicable delays according to the local regulation.



## VIII/ Protection of the whistleblower



### Confidentiality of the report

In accordance to the French Sapin II Law; this alert procedure ensure a strict confidentiality of

- your identity as whistleblower
- the identity of the persons affected by your report and, generally, of any information provided.

Any person having access to information within the framework of this alert procedure, its processing and the investigations that may occur, is bound by a strict obligation of confidentiality.

Apart from the judicial authority, the elements likely to identify you as the whistleblower cannot be disclosed without your consent. Equally, the elements likely to identify the person(s) targeted by your report cannot be disclosed before the appropriateness of the alert is set out.

The persons disclosing confidential information may face legal proceedings and/or disciplinary sanctions.



### No reprisal measures following a report

SES-imagotag will not impose nor tolerate any sanction, any threat to sanction, change of status, harassment, or retaliation of any kind, towards a whistleblower acting in good faith in the framework of this procedure, even if the facts turn out to be inaccurate or do not go further.

Similarly, a person cannot be rejected from a recruitment process, from accessing an internship or a professional training period, because of the initiation of an alert in the framework of this procedure.



### GDPR & Rights of individuals

In accordance with the regulations applicable to personal data protection in most of the countries in which the Group is present and, in particular inside the European Union, any person identified in the framework of an alert procedure, whether this person is the whistleblower or the target of the report may contact: [ethics@ses-imagotag.com](mailto:ethics@ses-imagotag.com), in order to exert the your right of information, access, correction or deletion and of limitation of the processing of your personal data.



### Obstacle to a report:

Any person acting as obstacle, in any way, to the transmission of a report may face legal proceedings and/or disciplinary sanctions.



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