



The whistleblowing system within Bel Group

Why a whistleblowing system?

At Bel, we conduct our business in compliance with applicable laws and regulations as well as steadfastly promoting our values and commitments. As early as 2012, we adopted a Code of Good Business Practices (the "Code"), which underlines the 7 key principles to be applied in conducting our business and is a core part of our ethics-first approach.

When employees, corporate representatives, partners or external stakeholders of the Group, are aware of or are the victim of a breach of the Code or of behavior that they consider inappropriate, they have the right to report such breaches internally (e.g., Ethics Referents, Managers, HR, etc.) and/or via a dedicated and confidential whistleblowing system, the Bel Ethics Line (BEL)

The whistleblowing system ensures that all reports are handled appropriately and impartially by the Bel Group, while respecting the principles of confidentiality and protection from which whistleblowers may benefit.

What can be reported?

The whistleblowing system can be used to report facts of which you have personal knowledge and/or which you have obtained during your professional activity, relating to:

- A crime, an offense, a violation of the law, regulations or an international commitment duly ratified or approved by France;
- A threat or harm to the public interest;
- A risk to human rights, the environment, health or safety;
- A breach of the Code of Good Business Practices or Bel Group Anti-Corruption Procedure.

For example, the whistleblowing system can be used in the following areas:

- Fighting corruption and fraud;
- Health, hygiene and safety in the workplace;
- Environmental protection;
- Harassment;
- Discrimination;
- Compliance with competition rules;
- Protection of human rights.



Reports may not concern elements covered by national defense secrecy, medical secrecy, the secrecy of judicial deliberations, the secrecy of judicial investigations, or the secrecy of lawyer-client relations.

Who can make a report?

The whistleblowing system is open to all internal and external stakeholders of the Bel Group.

For example, it is available to:

- our employees, interns, work-study students, temporary workers, job applicants and former employees;
- our managers, shareholders, members of the Board of Directors;
- our partners, suppliers, subcontractors, and customers.

How does the Bel Ethics Line (BEL) work?

The Bel Ethics Line is accessible:

- **Online:** <https://groupebel.speakup.report/speakupline>, Choose your language, then "New report". You will have the opportunity to make your report and attach any documents in your possession.
- **By telephone:** <https://www.groupe-bel.com/wp-content/uploads/2023/06/speakup-tool-phone-numbers.pdf> you will find here a list of numbers by country. You will be connected to a voice mail where you can leave a message in your language.
- **By a dedicated application:** after downloading the application, you can leave a written or voice message in your own language.

You will receive an acknowledgement of receipt of your report within 7 days of its receipt by the Bel Group (unless special circumstances justify a longer period). In the event of an oral report, you will have the option of requesting a videoconference or a physical meeting. Where possible, this will be arranged within twenty working days of receipt of the request.

Reports are handled by the Trust & Ethics Team. The Trust & Ethics Team is responsible for verifying the facts reported, and may, for example, ask you for further information, open an investigation or organize interviews to ensure that your report is handled correctly. Where necessary, it may also enlist the help of third parties, while respecting the principles of integrity and confidentiality of information (e.g., Ethics referents at head office or in subsidiaries). For sensitive reports, the Compliance & Ethics Committee will be notified and will ensure proper follow-up of the report.

All investigations are carried out in accordance with local law, in particular labor law. In addition, the Bel Group implements a number of measures to ensure the impartiality, independence and neutrality of the people responsible for handling the reports received. In this respect, a person



who is the subject of a report may never take part in the processing of a report concerning this person.

We will endeavor to inform you within three months regarding the processing of your report (except in special circumstances requiring a longer processing time) and when your report is closed. Please note that if a report does not comply with the rules set out in this procedure, or if the report cannot be processed (e.g., due to lack of information), you will also be informed.

What are the guarantees of the BEL whistleblowing system?

The Bel Group is committed to developing a genuine culture of dialogue and wishes to offer its employees and external stakeholders a secure and accessible whistleblowing system.

We therefore guarantee the strict confidentiality of the identity of the person making the report, in accordance with the legal framework. If you wish, you can also make your report completely anonymous, if local law permits. In practice, we restrict access to reports received to those authorized to receive them and ask them to respect a strict commitment to confidentiality. Reports received by other people must also be forwarded without delay to the Trust & Ethics team's referents.

We also protect whistleblowers against any reprisals they may suffer, in accordance with applicable laws. Thus, no report made in good faith may give rise to any prejudicial measures (e.g., dismissal, suspension, disciplinary measures, disadvantageous treatment, etc.), even if the facts subsequently prove to be inaccurate or do not give rise to any follow-up action. In certain cases, the protection afforded to the whistleblower may also be extended to persons in a relationship with the whistleblower (for example, the person who helps the whistleblower to make its report).

Where permitted by law and not prejudicial to the investigation, we may also inform the person concerned that he or she is the subject of a report, in order to preserve their rights. We will also inform them of the closure of the investigation when the report is not followed by proceedings, or of the implementation of disciplinary procedures or legal proceedings. However, the identity of the reporting person cannot be communicated to the person concerned under any circumstances.



Important information:

- The whistleblowing system is only one of several means of reporting, and failure to use it cannot result in any sanctions against staff members who report a breach through any other means. It is also possible to make a report to the external authorities designated by law.
- However, the Bel Group prohibits any misuse of the whistleblowing system. A report made in bad faith, for example to harm others, may expose its author to disciplinary sanctions and/ or legal proceedings.



- The personal data collected in the context of the report are processed by BEL SA, in its capacity as data controller, for the purpose of collecting and managing the reports. Your data are intended for the persons specifically responsible for the management of reports within the Bel Group. They will be kept for the entire duration necessary and proportionality for verification operations and protection of reporting persons, where applicable, until the end of the disciplinary or litigation proceedings initiated or the applicable statute of limitations. You have the right to access, rectify and, if necessary, delete your data in accordance with the applicable regulations on the protection of personal data. Under certain conditions, any person concerned also has the right to object and limit the processing of data. The above rights may be exercised at any time by contacting dpm@groupe-bel.com.

Do you have any questions about the whistleblowing system? Do not hesitate to contact the Trust & Ethics Department or your [Ethics Referent](#)!



How to access to the BEL whistleblowing system via phone

- I. Dial the phone number for the country that you are located in.
- II. The voice prompts will guide you through the following steps:
 - 1) Enter Bel organization Code which is **103 297**
 - 2) Select your language
 - 3) You will receive a unique "report number" (*write this down carefully as you will need it to be able to call back and hear a response to your report*)
 - 4) Choose a 4-digit PIN code (*remember it so that you can log back in later*)
 - 5) After the tone simply speak your message
 - 6) Once done press 1 or simply hang-up

Important information: your voice will never be heard by Bel. We will only receive a transcript of your voice recording.

** If you can't find your country in the list, it's because the whistleblowing system is currently only available online or via the Application.*



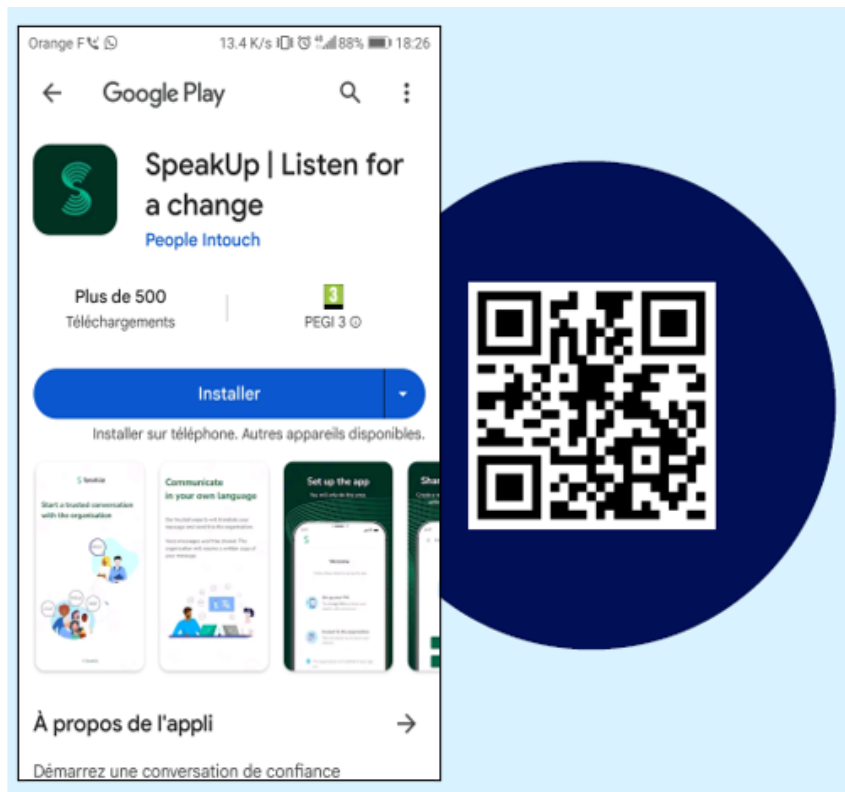
How to access the BEL whistleblowing system via the website

- 1) Connect to the BEL whistleblowing system web page via the following URL:
<https://groupebel.speakup.report/fr-FR/speakupline/home>
- 2) Click on “+ New report” to start a trusted conversation. If you already have a report open, select “Log in”.
- 3) Select the language in which you wish to write your message.
- 4) Write down your unique “report number” and create a password for your report.
- 5) Type your message. You can upload attachments using the clip icon in the top right-hand corner.
- 6) Click on “Send message” and your message and attachments will be processed.
- 7) You have the option of leaving your e-mail address if you wish to be notified in the event of a reply. Once you have added your e-mail address, you will be asked to enter the verification code sent to the e-mail address provided. In the event that you wish to remain anonymous and do not leave an e-mail address, you will have to log back into your report to view the response.



How to access the BEL whistleblowing system via the dedicated Application

- 1) Download the "SpeakUp by People Intouch" application from the App Store/Google Play or scan the following QR code



- 2) Open the App
- 3) Click on 'Set up your PIN' and enter a 6 digit code. You will need to enter this PIN each time you open the App. If you forget your PIN, you need to re-install the App and set up a new one. If so, you will lose access to your ongoing open reports.



4) The App will ask you to connect to Bel's whistleblowing system:

- By scanning the following QR code:



- Or by clicking on the 'Connect Manually' button on the bottom of the page and entering Bel code **103 297**

5) Press the "+ New report" button. You can then choose to leave a written or voice message.

6) You can choose to be informed by the application of any response made by the Group to your report. Otherwise, you will have to log in again to see the Group's response.