

**Presentation of the deployment of the internal  
report system  
Keyrus SpeakUp Line**

## I Who can raise the report ?

Members of the staff and the board of directors, external and/or occasional employees, co-contractors and subcontractors.

Staff members whose employment relationship ended when the information was gathered in the course of that relationship.

In order to deal with the alerts that will be reported as part of this system, Absys Cyborg has set up a Group Ethics Committee composed of three members, whose respective functions are:

- QUELIN Nathalie / Director of Human Resources Absys Cyborg,
- BERQUEZ Célia / Senior Legal Council Absys Cyborg,
- LEFEBURE Laurent / Chief Financial Officer.

## II What facts can be the subject of an alert?

Facts **that have occurred or are very likely to occur** and that fall within the definition of a whistleblower:

- Any violation of the law, of an international commitment,
- Any attempt to conceal such violation,
- A threat or public interest damage.

The whistleblowing system makes it possible to report facts, in particular but not limited to, in the following areas:

- Any violation of any Group Charter or Code of Conduct,
- Corruption, competition, money laundering,
- Accounting, Finance, Banking,
- Discrimination, harassment,
- Occupational Health, Hygiene and Safety,
- Protection of public health,
- Environmental protection,
- Protection of privacy, personal data and security of information systems,
- Consumer Protection, Product Safety and Compliance,
- Other.

### III Whistleblower status

To be able to file an alert, five conditions must be met:

**1 Be a natural person:**

**2 Have obtained the information in a professional setting:**

If the information was known outside the professional context, the person must have had personal knowledge of the facts and cannot, in this case, simply recall the facts observed by someone else.

**3 Acting without direct financial compensation:**

The person must not receive a financial benefit that would result directly from their report.

**4 Act in good faith:**

The person is satisfied that the reported alert relates to real events.

**5 Reveal facts referred to in condition 2**

The whistleblower can rely on one or more trusted persons. The latter benefit from the protection afforded by the whistleblower status and the rights that go with it.

The following are considered to be protected third parties:

- a. A facilitator: i.e. a non-profit natural or legal person who assists the whistleblower in reporting or disclosing information,
- b. A natural person linked to a whistleblower and who is at risk of retaliation,
- c. An organisation owned by or for which the whistleblower works, or linked to the whistleblower by an employment relationship.

The person concerned may request that the protective status of whistleblower be certified by the Defender of Rights<sup>1</sup>.

In the event of wilful slanderous denunciation or misuse of the device, the author is liable to disciplinary sanctions. The person may also be subject to criminal and/or civil prosecution.

When these criteria are met, the whistleblower benefits, in accordance with the law, from guarantees:

- Criminal immunity in the event of the disclosure of a secret protected by law.

There is, however, an exclusion for secrets relating to: national defence secrecy, medical secrecy, secrecy of judicial deliberations, secrecy of judicial investigation or investigation or lawyer-client privilege;

- Criminal immunity in the event misappropriation or concealment of documents or any medium containing information of which he has knowledge and which he discloses.
- Civil immunity, in particular, for the person who has publicly disclosed information. It will not be held accountable for the damage caused.

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<sup>1</sup> Public administration certifying the protective status of whistleblower.

- They cannot be dismissed, disciplined, discriminated against, or suffer reprisals as a result of the whistleblowing.

The law provides:

- A sentence of one year in prison and a fine of €15,000 for any person who in any way obstructs the transmission of an internal report to the company or to the judicial, administrative or professional authority.
- A fine of €60,000 against any person (natural or legal) who implements a delaying or abusive procedure against a whistleblower. During the proceedings, the whistleblower may be paid subsidies if his or her economic situation has seriously deteriorated. The person who initiated the action will also be ordered to pay damages. The sentencing decision may be posted or disseminated.
- A sentence of two years in prison and a fine of 30,000 euros against any person (legal or natural) who discloses a confidential element relating to the whistleblower.
- A sentence of three years' imprisonment and a fine of €45,000 against any person who aims to discriminate against a whistleblower, his facilitators or a person related to the whistleblower.
- The possibility for the judge to impose an obligation to top up the whistleblower employee's professional training account.

**Any employee of the company who is guilty of one of these offences may be subject to disciplinary action and official reporting to the competent authorities.**

#### **IV Under what guarantees should an alert be issued ?**

All data collected as part of this whistleblowing system will be treated confidentially, whether it is:

- The identity of the person making the report.
- The facts, which are the subject of the report.
- Witnesses who are the subject of the report.
- Or the people involved in the report.

All necessary precautions will be taken to preserve the security of this data:

- The persons in charge of collecting reports or processing them are subject to an enhanced obligation of confidentiality and act in accordance with the Ethics Charter of the Absys Cyborg Ethics Committee.
- The personal data collected as part of this whistleblowing system is processed in accordance with the obligations of the General Data Protection Regulation (GDPR).

## V How do I send the report?

There are several choices:

### I. You have doubts or questions about a particular situation

You can write and/or ask your questions to:

- Your supervisor, your superior's superior,
- To the Human Resources Manager,
- to the Compliance Officer,
- To the Executive Director/President.

They will be required to forward your disclosures to the Absys Cyborg Ethics Committee for handling the alert. If you have any questions, please do not hesitate to ask them to the Group Director in charge of these issues within the parent company Keyrus SA via the following dedicated email address:

[Keyrus.RiskCompliance@keyrus.com](mailto:Keyrus.RiskCompliance@keyrus.com)

### II. You can't or don't want to talk to these people

**You have the choice to:**

#### V.2.1 1st Alternative

**If you believe that the breach can be effectively remedied internally, you can report:**

- **To the Absys Cyborg Ethics Committee via the following dedicated email address [ComiteEthique@Absyscyborg.com](mailto:ComiteEthique@Absyscyborg.com)**
- **Or via the alert site at the following link <https://absyscyborg.integrityline.app/>**

The information to be provided is as follows:

- Your surname, first name, position and place of work:

**You can choose to remain anonymous when reporting on the dedicated platform.**

However, the company's obligation to provide feedback does not apply in the case of anonymous reporting.

It should be noted that a report on the dedicated e-mail address **cannot be anonymous.**

- The facts that you wish to communicate, **in an objective and sufficiently precise manner**, to allow the alleged facts to be verified.
- The e-mail address, if any, at which you would like to be informed about the processing of the alert if it is different from the one used for the initial report.

## V.2.2 2<sup>nd</sup> Alternative

### You do not wish to speak directly to the subsidiary or group

#### **At first:**

You may find yourself in two situations:

First, you believe that your report will not remedy the situation internally:

- You can refer the matter directly to the judicial authority, the competent administrative authority (list in the appendix) or the Defender of Rights so that he can direct you to the competent authority.

The entire administration is subject to an obligation to transmit. Thus, if you do not refer the matter to an authority mentioned in the appendix, it will forward your report to the competent authority.

- You can contact this authority in parallel with your internal report.

It is possible for you to mention the parallel referral to a competent authority during your internal report.

Secondly, following a report through the internal channel that has not been returned within 3 months of the acknowledgement of receipt or has failed, you can refer the matter to the administrative or judicial authority or to the Defender of Rights.

#### **Secondly:**

You can reveal the facts publicly:

- If you have made an external report, and possibly an internal one, and no appropriate action has been taken within the time limit (3 months in the case of an internal report, 6 months in the case of an external report).
- In the event of an imminent and manifest danger to the public interest, in particular when there is an emergency situation or a risk of irreversible damage.

In any case, you can ask the Defender of Rights to certify your status as a whistleblower.

## VI How is the alert handled ?

- You will receive an acknowledgment of receipt of your report within 7 days, at the email address you have used or the one indicated as the chosen exchange address.
- You will then be informed of the foreseeable time frame within which the ethics committee will be able to examine the admissibility of the report.
- The Ethics Committee shall carry out the necessary investigations to find the elements that may or may not prove the alleged facts within a reasonable time. In this case, they may call on an external service provider.
- You will be informed of the progress of the procedure, i.e. the measures envisaged or taken to assess the accuracy of the facts within 3 months.

- If the report issued establishes that there has been a violation of the law, the ethics committee will take corrective and remedial measures to avoid a recurrence of the facts by dealing with the cause.
- You will be notified in writing that the file has been closed.

## VII Retention of personal data

- The data relating to an alert may be kept in an active database until the final decision is taken on the action to be taken on the alert. This decision must be made within a reasonable period of time from receipt of the report.
- After the final decision has been taken on the follow-up to be given to the alert, the data may be kept in the form of intermediate archives, "for the time strictly proportionate to their processing and to the protection of their authors, the persons they target and the third parties they mention, taking into account the time limits for any additional investigations".
- The data may be kept for a longer period of time, for intermediate archiving, if the data controller is legally obliged to do so (for example, to meet accounting, social or tax obligations), or for evidentiary purposes with a view to a possible control or litigation, or for the purpose of carrying out quality audits of the processes for handling reports.
- When disciplinary or contentious proceedings are initiated against a defendant or the author of an abusive whistleblower, the data relating to the whistleblowing may be kept by the organisation responsible for managing the whistleblowing until the end of the procedure or the limitation period for appeals against the decision taken.

## VIII General information for users of the device

This procedure is available on the website of Absys Cyborg [www.absyscyborg.com](http://www.absyscyborg.com) and, where applicable, those of the subsidiaries concerned by this procedure.

This procedure is given to all employees of Absys Cyborg and the subsidiaries concerned by it.

These proceedings are based on the internal regulations of Absys Cyborg and the subsidiaries concerned by it.

## Appendix: List of Competent Authorities

### 1. Procurement:

- French Anti-Corruption Agency (AFA), for breaches of probity.
- Directorate-General for Competition, Consumer Affairs and Fraud Control (DGCCRF), for anti-competitive practices. (France)
- Concurrency Authorities, for anti-competitive practices.

### 2. Financial Services, Products and Markets and the Prevention of Money Laundering and Terrorist Financing:

- « Autorité des marchés financiers » (AMF), for investment services and market infrastructure providers (France).
- « Autorité de Contrôle Prudentiel et de Résolution » (ACPR), for credit institutions and insurance organizations. (France)

### 3. Product Safety & Compliance:

- Directorate-General for Competition, Consumer Affairs and Fraud Control (DGCCRF). (France)
- Central Service for Weapons and Explosives (SCAE). (France)

### 4. Transportation Safety:

- Directorate General of Civil Aviation (DGAC), for air transport safety. (France)
- Land Transport Accident Investigation Bureau (BEA-TT), for the safety of land transport (road and rail). (France)
- Directorate-General for Maritime Affairs, Fisheries and Aquaculture (DGAMPA), for maritime transport safety. (France)

### 5. Environmental Protection:

- General Inspectorate of Environment and Sustainable Development (IGEDD). (France)

### 6. Radiation protection and nuclear safety:

- Nuclear Safety Authority (ASN). (France)

### 7. Food Safety:

- General Council for Food, Agriculture and Rural Areas (CGAAER). (France)
- National Agency for Food, Environmental and Occupational Health and Safety (ANSES). (France)

## 8. Public health:

- National Agency for Food, Environmental and Occupational Health and Safety (ANSES). (France)
- National Public Health Agency (Santé publique France, SpF). (France)
- High Authority for Health (HAS). (France)
- Biomedicine Agency.
- French Blood Establishment (EFS). (France)
- Committee for the Compensation of Victims of Nuclear Tests (CIVEN). (France)
- General Inspectorate of Social Affairs (IGAS). (France)
- National Institute of Health and Medical Research (INSERM). (France)
- National Council of the Order of Physicians, for the practice of the medical profession. (France)
- National Council of the Order of Physiotherapists, for the exercise of the profession of physiotherapist.
- National Council of the Order of Midwives, for the practice of the midwifery profession.
- National Council of the Order of Pharmacists, for the practice of the profession of pharmacist.
- National Council of the Order of Nurses, for the practice of the nursing profession.
- National Council of the Order of Dental Surgeons, for the practice of the profession of dental surgeon.
- National Council of the Order of Chiropodists, for the practice of the profession of chiropodist.
- National Council of the Order of Veterinarians, for the practice of the veterinary profession.

## 9. Consumer Protection:

- Directorate-General for Competition, Consumer Affairs and Fraud Control (DGCCRF). (France)

## 10. Protection of privacy and personal data, security of networks and information systems :

- National Commission for Information Technology and Civil Liberties (CNIL). (France)
- National Agency for the Security of Information Systems (ANSSI). (France)

## 11. Violations affecting the financial interests of the European Union:

- French Anti-Corruption Agency (AFA), for breaches of probity.
- Directorate-General for Public Finances (DGFiP), for value-added tax fraud. (France)
- Directorate General of Customs and Indirect Taxes (DGDDI), for fraud in customs duties, anti-dumping duties and similar duties. (France)

## 12. Infringements relating to the internal market:

- Directorate-General for Competition, Consumer Affairs and Fraud Control (DGCCRF), for anti-competitive practices. (France)
- Competition Authority, for anti-competitive practices and state aid.
- Directorate-General for Public Finances (DGFIP), for corporate tax fraud. (France)

## 13. Activities carried out by the Ministry of Defence:

- General Control of the Armed Forces (CGA). (France)
- College of Inspectors General of the Armed Forces.

## 14. Official statistics:

- Official Statistics Authority (ASP). (France)

## 15. Agriculture:

- General Council for Food, Agriculture and Rural Areas (CGAAER). (France)

## 16. National Education and Higher Education:

- Mediator for National Education and Higher Education.

## 17. Individual and collective labour relations, working conditions :

- Directorate-General for Labour (DGT). (France)

## 18. Employment and vocational training:

- General Delegation for Employment and Vocational Training (DGEFP). (France)

## 19. Culture:

- National Council of the Order of Architects, for the practice of the profession of architect.
- Auction house counsel for public auctions.

## 20. Rights and freedoms in the context of relations with State administrations, local authorities, public institutions and bodies entrusted with a public service mission:

- Defender of Rights.

## 21. Best interests and rights of the child:

- Defender of Rights.

## 22. Discrimination:

- Defender of Rights.

## 23. Ethics of persons carrying out security activities:

- Defender of Rights.