

Practical guide to whistleblowing

2020 version



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1. WHAT IS A WHISTLEBLOWER ?

What is the definition of a whistleblower?

A whistleblower is someone who has become personally aware of events that appear to constitute a breach of the rules applicable to the entity concerned and who reports these events in accordance with the internal procedure provided for that purpose.

What are the conditions for benefiting from protection as a whistleblower ?

CONDITIONS RELATING TO THE WHISTLEBLOWER:

- An individual
- Acting in good faith
- Direct witness of the events reported
- Disinterested (acting in the collective interest and drawing no personal gain from the alert)

CONDITIONS RELATING TO THE EVENTS REPORTED:

The events must fall within the scope of the alert system:

- Crimes or offences
- Serious and manifest breach of a regulation or an international commitment
- Serious threat or damage to the public interest
- Risk of damage to or serious violation of human rights, fundamental freedoms or personal health or safety
- Situations in breach of Covéa's anti-corruption code of conduct*

**Document appended to Covéa's internal regulations*

➔ The person will not benefit from whistleblower protection unless all these conditions are met



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MORE SPECIFICALLY, WHAT TYPES OF SITUATION CAN BE REPORTED ?

Economic and financial

- Fraud, theft, swindling, misappropriation of company assets
- Money laundering, tax fraud
- Insider trading
- Breach of the anti-corruption code of conduct: bribery, influence peddling, violation of gift and invitation rules

Personal security, health, safety and the environment

- Serious violation of human rights or security: discrimination, psychological or physical harassment, forced labour, infringement of freedom of association
- Serious breaches of personal data protection: large-scale data leaks
- Serious environmental damage giving rise to a major risk or serious harm: pollution

HOW IS A WHISTLEBLOWER PROTECTED ?

Whistleblowers are protected by the strict confidentiality of their identity, which will not be disclosed. The content of their alert is secure, as are subsequent conversations on the platform with the Covéa Alert Officer.

They may not be held criminally liable for disclosing confidential information (e.g. medical information) protected by law provided that such disclosure is necessary and commensurate with safeguarding the interests in question.

Whistleblowers are protected against any discrimination or disciplinary action by their employer in connection with the alert.



2. WHAT IS THE PROCEDURE TO FOLLOW ?

WHO SHOULD YOU CONTACT IF YOU WITNESS UNETHICAL SITUATIONS OR BEHAVIOUR?

Employees can inform their usual contacts (managers, HHR, etc.) but if the events are serious and fall within the scope of the alert procedure, it is preferable that they use the alert system, which ensures that their identity remains confidential.

WHAT PROCEDURES MUST BE FOLLOWED?

French law provides for a three-stage procedure:

- 1** The alert must be filed internally with the **Alert Officer**
- 2** If no internal response is received within the time limit set in the procedure, the matter may be referred to the **competent authorities** (judicial or administrative)
- 3** If a response is then still not forthcoming, the matter can be made **public**

To benefit from whistleblower protection, you must follow the Covéa Group's whistleblowing procedure and the step-by-step procedure above.



WHAT DEFINES A RESPONSIBLE ALERT ?

A *bona fide* whistleblower who complies with the Covéa procedure will not suffer any consequences linked to the alert (no retaliatory measures or reprisals, notably by the employer).

However, if you misuse the alert system to cause harm (false allegations or slanderous accusations), you run the risk of disciplinary sanctions (if you are a Covéa employee) or even legal action.

WHAT ARE THE PRACTICAL ARRANGEMENTS FOR WHISTLEBLOWING AT COVEA ?

In March 2018, the Covéa Group put in place the following whistleblowing system:

<p>An external online platform</p> <p>For employees : https://report.whistleb.com/en/covea</p> <p>For third parties : https://report.whistleb.com/en/covea-vigilance</p>	<p>enables highly secure and confidential exchange between the whistleblower and the Alert Officer</p>
<p>An Alert Officer* (Chief Compliance Officer)</p>	<p>is responsible for collecting and processing alerts</p>
<p>An Ethics Committee*</p>	<p>is responsible for helping the Alert Officer to process alerts.</p> <p>It is made up of:</p> <ul style="list-style-type: none"> • the Chief Compliance Officer, who chairs it • the Head of Permanent Internal Control • the Head of Internal Audit <p>If so, depending on the object and context of the alert :</p> <ul style="list-style-type: none"> • the Head of Human Resources • the Head of Legal • the Head of Corporate Societal Commitment
<p>An Investigation Unit*</p>	<p>is responsible for investigating alerts to check the veracity of reported events</p>

** Under an obligation of strict confidentiality*



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What happens once the alert has been sent to the platform?

- The whistleblower receives an automatic acknowledgement of receipt.
- A message is then posted within 30 days on the WhistleB/Cov ea platform stating whether or not the alert is admissible.
- If the alert is admissible, the whistleblower is informed within three months of the action that the Alert Officer has taken in response to the alert, again on the secure platform.

What should you do if no response is made to the internal alert?

- ➔ If no response is made to the alert within three months, its author is legally entitled to forward it to the competent authorities while continuing to benefit from protection as a whistleblower.



3. WHAT ARE THE DATA PROTECTION RIGHTS OF USERS OF THE WHISTLEBLOWING PLATFORM?

The WhistleB/Covéa whistleblowing platform is used to collect and process alerts. Use of the Covéa alert system is optional, so you cannot be penalised for not using it.

Events reported must relate to breaches of Covéa's anti-corruption code of conduct or to any other serious risk or situation, as defined above.

Specific security measures are taken to ensure that the whistleblower's identity remains confidential, and the related data secure.

Data concerning the whistleblower is intended for the authorised persons (Alert Officer, Ethics Committee and Investigation Unit) responsible for managing alerts within the Covéa Group.

In no event will it be disclosed to the person targeted by the alert, even if they exercise their personal data access rights.

The data collected by the whistleblowing system may be disclosed, solely for the purposes of the investigation, to appointed experts who themselves are bound by a contractual obligation of confidentiality.

The whistleblower has a right to access, change and delete their data by using the secure platform to contact the Alert Officer, who will process any such request in liaison with the Data Protection Officer (DPO).



Covéa's Practical guide to whistleblowing is available on the Covéa intranet and the www.covea.eu website

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