



ALERTCYS

Alert management process



1 General principles	3
2 Definitions	4
3 The procedure for collecting the report	6
3.1 Methods of transmitting the alert	6
3.2 Treatment of the alert by the Mediator	6
3.2.1 Inadmissibility of the alert	7
3.2.2 Receivability of the alert	8
3.3 Processing of the alert file by the Organization	8



1 General principles

Alertcys.io is a professional alert processing service, a service allowing a person (employee, co-contractor, third party, etc.) to bring to the attention of their entity a situation, behavior or risk likely to characterize an offense or violation of ethical rules adopted by the entity in question, such as a breach of a charter or a code of conduct.

The cost of alerts is entirely borne by the company using Alertcys.io services, for an amount of €300 per alert processed by Alertcys. Filing an alert is free for the Whistleblower.

On the one hand, Alertcys.io can process alerts provided for by specific legislative or regulatory provisions, whether or not the Organization is legally subject to these provisions. These may include, in particular, the measures provided for by articles 8 and/or 17 of the law known as the “Sapin 2 law”, or implemented in application of the “law relating to the duty of vigilance”, whatever the size of the workforce, the legal nature or even the turnover of the organizations concerned.

In this first hypothesis, any report made in good faith and which reveals or reports a criminal offense, a serious and manifest violation of an international commitment regularly ratified or approved by France, or a unilateral act of an international organization taken on the basis of such a commitment, law or regulation, or a serious threat or harm to the general interest, when the facts in question are not covered by national defense secrecy, the medical confidentiality or the confidentiality of relations between a lawyer and his client.

On the other hand, Alertcys.io can also process ethics alerts, alerts which report behavior deemed incompatible with the ethical charter or the internal regulations of the entity.

In this second hypothesis, any report made in good faith and which reveals or reports a violation of ethical rules adopted by an organization or group constitutes an ethics alert, as long as the rules in question are codified in a written document (such as internal regulations, an ethical charter, etc.) which respects the entire existing legal framework (in particular labor legislation and all the fundamental rights and freedoms of the persons concerned), and whose existence and enforceable nature are first brought to the attention of all the people concerned.

Alertcys.io can allow you to report:

- professional alerts
 - a crime or misdemeanor;
 - a serious and manifest violation of an international commitment regularly ratified or approved by France;
 - a serious and manifest violation of a unilateral act of an international organization taken on the basis of a regularly ratified international commitment;



- a serious and manifest violation of the law or regulation;
- a serious threat or harm to the general interest, of which the issuer of the alert had personal knowledge.
- the existence of conduct or situations contrary to the company's code of conduct and likely to characterize acts of corruption or influence peddling.
- the existence or realization of risks of serious attacks on human rights and fundamental freedoms, the health and safety of people as well as the environment, resulting from the activities of the company and those of the companies it controls meaning of II of Article L. 233-16, directly or indirectly, as well as the activities of subcontractors or suppliers with whom an established commercial relationship is maintained, when these activities are attached to this relationship.
- ethical alerts:
 - an existing or realized risk of behavior or a situation contrary to an ethical charter of the Organization, regardless of the author of the alert or their link with the Organization.

Alertcys.io is a service made available by the company CONCORD (registered 838 808 525 in the trade and companies register).

The Alertcys.io Service relies in particular on:

- a network of bailiff mediators and their lawyers
- an online technological platform accessible at the URL address <https://alertcys.io> under the conditions defined below developed by the company CONCORD.

2 Definitions

“Alert file” : designates the description of the facts subject to the report and any associated document supporting the alert transmitted by the Whistleblower.

“Whistleblower” : designates the natural person who reveals or reports the facts. The Whistleblower may be a member of the Organization's staff, an external and occasional collaborator, or a third party.

“Mediator” : designates the legal professional, active bailiff, natural person responsible for collecting and processing the report transmitted by the Whistleblower via the Platform. The bailiff is also trained in mediation. The bailiff, a legal professional, has a dual mission within the framework of the Alertcys.io service:

- enforce the rules of law which apply to the processing of an alert: confidentiality of the alert and in particular of the identity of the Whistleblower, compliance with the



rules of admissibility of an alert, compliance with legal deadlines for processing an alert

- mediator mission: the bailiff has the role of independent and impartial mediator between the Whistleblower and the Organization, in particular by ensuring that the exchanges respect the interests of both parties. In this role of mediator, the bailiff never advises one of the parties.

“Mediation”: Mediation is a method of amicable resolution of disputes, by which the parties express their consent to present their dispute to a third party, the Mediator, who will assist the parties to help them reach an amicable resolution, without commenting on the facts or the law relating to the dispute. The exchanges between the Whistleblower and the representative of the Organization take the form of mediation.

“Jurists” : designates all natural persons responsible for assisting the Bailiff in his mission.

“Organization” : public or private entity having entered into a contract with the Concord Company for the use of its Alertcys.io service.

“Platform” : designates the technological tool allowing online management of alerts. The platform is available at the following URL: <https://alercys.io>

“Referent” : designates a natural or legal person designated by the Organization when registering for the Alertcys.io Service to receive the report issued by the Whistleblower. The Referent must have sufficient competence, authority and means to carry out his mission.

“Regulations applicable to the protection of personal data” : designates Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (the GDPR) , law n°78-17 of January 6, 1978 as amended, known as the “Informatique et Libertés” law, and any other applicable regulations including guidelines, recommendations, standards or codes of conduct adopted by the CNIL.

« Service » : designates the professional whistleblowing system made available to public or private organizations. The Service includes the human resources, technical (the Platform) and legal resources put in place.



3 The procedure for collecting the report

3.1 Methods of transmitting the alert

The Whistleblower can submit his file via two channels:

- By post by writing to

Alertcys.io Alert Service
73, Boulevard de Clichy
75009 PARIS

- By deposit on the alertcys.io online platform

For reasons of confidentiality and accountability, the service does not accept files sent by email or following telephone calls. However, the Whistleblower can usefully make contact by telephone or by electronic message by writing to contact@alertcys.io.

To file an alert by mail, it is advisable to remember to state your identity in your letter, to be precise about the facts described and to attach evidence.

3.2 Treatment of the alert by the Mediator

Upon receipt of the alert, an acknowledgment of receipt is automatically sent by email or post to the Whistleblower in order to inform them of the receipt and taking into account of their report by the Alertcys.io Service.

The lawyers carry out an initial analysis of the file and appoint a mediator competent in the area of the alert.

The Mediator becomes aware of the alert within less than 2 working days from the filing of the alert.

The Mediator in turn analyzes the file and verifies that it complies with the conditions of impartiality, independence and competence for handling the alert.

The Whistleblower is informed by email or post that the Mediator is examining the admissibility of the report within a reasonable time, which will not exceed one week (5 working days from the filing of the alert).). This period can be used to communicate with the Whistleblower if necessary.

To determine whether the alert is admissible or inadmissible and whether the Whistleblower is in good faith, the Mediator examines the description of the facts subject to the report and the documents transmitted and asks the questions that he considers necessary to examine the file.



At the end of the examination, the Mediator informs the Whistleblower of his decision regarding the follow-up to be given to the report. The report may be inadmissible (3.2.1) or admissible (3.2.2).

3.2.1 Inadmissibility of the alert

If the elements of the alert are covered by national defense secrecy, medical confidentiality or lawyer-client privilege, then the alert is automatically excluded from the reporting system and deleted by the Mediator. The Whistleblower is informed via the platform of the closure of the Alert File and the immediate deletion of the data or their archiving after anonymization.

If the facts subject to the report and the documents transmitted do not make it possible to establish the serious and well-founded nature of the alert and the good faith of the Whistleblower, the Mediator draws up a report of the verification operations transmitted to the Organization on the file forum and concludes that the alert is inadmissible.

The Whistleblower is informed by email or post of the inadmissible nature of the alert. The decision of inadmissibility must be motivated.

The assessment of the serious and well-founded nature of the alert or the good faith of the Whistleblower is a unilateral decision by the Mediator and is not subject to appeal to Concord.

If his report is inadmissible, the Whistleblower is informed that he can contact the Defender of Rights for a new examination of his request.

It is specified that all elements of the referral to the Defender of Rights must be inserted in a closed envelope (called the inner envelope) which will be inserted in a second envelope addressed to the Defender of Rights (called the outer envelope).

The following note will appear on the inner envelope: "Reporting an alert under the law of December 9, 2016 / carried out on (date of dispatch)".

The outer envelope will have the following shipping address:

Défenseur des Droits
Free response 77120
75342 PARIS CEDEX 07
FRANCE



3.2.2 Receivability of the alert

If the alert is considered serious and well-founded by the Mediator, if the Whistleblower appears to be in good faith, the Mediator transmits the Alert File by email to a Referent designated by the Organization. He transmits it to a competent Referent in the sector of the alert and not involved in the alert. If this is not possible, the Mediator will contact the legal representative of the Organization by any means.

The Whistleblower File is anonymized, so that the identity of the Whistleblower is not communicated to the Organization or the Referent. Only the Alertcys.io Service has access to the identity of the Whistleblower. The identity declared by the Whistleblower when submitting the file is never transmitted to the Organization.

3.3 Processing of the alert file by the Organization

The Referent analyzes the alert file.

The Whistleblower is informed via the Platform that whistleblowing is a voluntary process, the Mediator cannot therefore force either the Whistleblower or the Organization to take action or take measures.

If the Referent considers that the alert is unfounded and that there is no reason to follow up on it, the Whistleblower is informed of this decision via the Platform within 15 working days from the filing of the alert. The Mediator can contact the Organization again to invite it to re-examine the file if this seems necessary.

If the Referent considers that the alert is well-founded, the latter has a total period of (3) three months from receipt of the Alert File to find a solution.

If the Referent considers that for the purposes of processing the alert, it is necessary to know the identity of the Whistleblower, the Referent may request, in a justified manner, via the platform the revelation of his identity to the Whistleblower. alert. The Whistleblower has the free choice to disclose his or her identity or not. This free choice is reminded to him by the Mediator.

If the Referent needs additional information on the facts related to the alert, he requests this information through the platform and in particular the forum linked to the file. Requests must be motivated. The Mediator helps the parties to ensure that the information necessary for the Referent to process the alert is provided.

When a solution is found, the Organization or the Referent chooses the level of information it wishes to give to the Whistleblower. This information is communicated to the Whistleblower via the Platform. If the level of information seems insufficient to the Whistleblower, he can contact the Organization again to benefit from a better level of



information. The Mediator helps the parties to agree on the level of information to be provided by the Organization on the solution found.

To secure the procedure, the Organization or the Whistleblower may request that evidence of the handling of the alert be kept for evidentiary purposes. In this case, the Organization or the Whistleblower makes a request to Alertcys.io for a report from the bailiff. The bailiff's report is made available to both parties.