

Alert and whistleblowing procedure

This procedure provides a framework and guidelines for reports of wrongdoing or misconduct that may be made by employees, service providers, trainees or work students of, or persons procured by, EasyVista and its affiliated companies.

Procedures for transmitting and processing alerts on any wrongdoing is the following:

Reporting channel: the report may be written or verbal.

Written notification takes the form of an e-mail to the following address: ethics@easyvista.com

Verbal notice may be made by telephone, by any voice messaging system or, at the employee's choice, during a videoconference or a physical meeting organised no later than 20 working days after receipt of the request.

The recipients of the alert are :

- The Chief Compliance Officer
- The Head of Legal

An acknowledgement of receipt is sent within seven working days, indicating the reasonable and foreseeable timeframe within which the admissibility of the alert will be examined, as well as the arrangements for informing the author of the action taken on the alert.

If the alert is not sufficiently substantiated to enable the addressee to assess its admissibility, the addressee may ask the whistleblower for the necessary additional information. In this case, the processing time indicated in the acknowledgement of receipt will not begin until these documents have been received. The alert will be processed within a maximum of three months from the acknowledgement of receipt of the alert or, in the absence of an acknowledgement of receipt, three months from the expiry of a period of seven working days following the alert.

If the recipient of the alert fails to verify the admissibility of the alert within a reasonable time, it may be sent to the judicial authorities.

Whistleblowers may not be subject to direct or indirect disciplinary or discriminatory measures for having made a report in good faith. They shall not be held criminally liable for breaching a secret protected by applicable law.

The recipient of the alert assesses the admissibility of the alert and carries out all operations to verify the serious nature of the facts reported, then determines the action to be taken.

This information may result in disciplinary proceedings being taken or the competent authorities being notified. The author of the alert must also be informed in writing, where appropriate, of the closure of the alert. This occurs when the allegations are inaccurate or unfounded or when the alert has become irrelevant.

The recipient of the alert is subject to the obligations of confidentiality and respect for the integrity of the information. He may communicate information relating to the alert only if such communication is necessary for the purposes of verifying or processing the information reported. These third parties are then subject to the same obligations.

The identity of the author of the alert and that of the persons concerned shall be treated as confidential by the recipient. Information identifying the whistleblower may only be disclosed with the whistleblower's consent, except to the judicial authority. Information likely to identify the person implicated by an alert may only be disclosed, except to the judicial authority, once the serious nature of the alert has been established.

The data relating to the alert shall be destroyed by the addressee within two months of the completion of all the admissibility or verification operations if no action is taken on the alert, or at the end of the disciplinary proceedings or legal proceedings when such action is taken against the accused person or the perpetrator of an abusive alert.

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