



WHISTLEBLOWER'S GUIDE

This document is available
in the following languages
on cnim.com: German, English,
Arabic, Chinese, French.

<https://cnim.com/>

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▲ Here are some examples of facts that may be reported via this system*:

- / Discrimination, harassment (sexual or psychological) or sexist behaviour in the workplace;
- / Corruption, conflict of interest or anti-competitive practices;
- / Disclosure of confidential information, including in connection with CNIM Group intellectual property rights;
- / Falsification of accounting, invoicing, audits or internal financial controls;
- / Inappropriate gift, entertainment or sponsorship practices;
- / Insider dealing or any behaviour in violation of the laws on financial instruments (shares, bonds, etc.);
- / Serious breach of the principle of protection of the environment, health or public safety;
- / Violation of fundamental human rights;
- / And more generally, any illegal or fraudulent behaviour.

Note: facts, information or documents covered by the secret de la défense nationale [French Official Secrets Act], medical secrecy or the confidentiality of relations between a lawyer and his/her client may not be the subject of whistleblowing via this system.

* non-exhaustive list



WHAT IS A WHISTLEBLOWER?

- ▲ Under the terms of the “Sapin II” law, a whistleblower must:
 - / **be a natural person;**
 - / **be personally aware of the facts** that he/she thinks must be reported;
 - / **be disinterested:** he/she must not benefit, in particular financially, from making the report;
 - / **be acting in good faith:** he/she must have reasonable grounds to believe that the facts reported are true.

HOW IS THE WHISTLEBLOWER LEGALLY PROTECTED?

If I comply with the CNIM Group whistleblowing alert collection and processing procedure and meet the criteria defined by law, I am criminally protected.

- / No disciplinary, discriminatory or retaliatory measures may be taken against me, **even if the reported facts prove to be unfounded**, provided that I acted in good faith.
- / If such a measure is taken against me (e.g. disciplinary action, refusal of promotion or pay increase, etc.), the company must demonstrate that the measure was taken for a reason other than my whistleblowing.

WHAT FACTS CAN BE REPORTED BY A WHISTLEBLOWER?

- ▲ **The facts reported must seem to me to be:**
 - / **contrary to the CNIM Group’s Ethics Charter** and to any code of conduct mentioned in this charter, in particular the **CNIM Group’s anti-corruption Code of Conduct;**
 - / **contrary to internal regulations** to which I am subject;
 - / a **crime** or an **offence;**
 - / a **serious and manifest breach of the law**, or an international commitment ratified or approved by France (e.g. the European Convention on Human Rights);
 - / a **threat or serious harm** to the public interest.

WILL MY WHISTLEBLOWING REMAIN CONFIDENTIAL?

- ▲ The CNIM Group undertakes to take all necessary measures to protect my identity, the facts reported and the identity of the person(s) concerned by the alert.
- ▲ No information about my identity may be disclosed without my consent, unless the CNIM Group is legally obliged to do so.

AM I SUBJECT TO A CONFIDENTIALITY OBLIGATION?

- ▲ Yes, I must not make public the facts or the identity of the people and organisations that are the subject of my whistleblowing (see the scale diagram opposite). **Non-compliance with this rule** could result in criminal proceedings against me, notably for defamation and **make me lose the protective status of whistleblower.**

I WANT TO ISSUE AN ALERT; HOW CAN I DO THIS?

- ▲ The law provides for a three-step scale, which I must respect to benefit from the status of whistleblower.

STEP 1 Alert internally

I send my alert to the CNIM Group Ethics Commission **via alerte@cnim.com**, or to a direct or indirect line manager, or the Human Resources Manager who is responsible for me.

STEP 2 Alert the competent authority

If the alert has not been processed within a "reasonable" period during step 1, I can send it to a judicial or administrative authority (French Anti-corruption Agency, etc.).

STEP 3 Alert publicly

If the alert has not been processed within three months during step 2, I can make it public (media, associations, unions, NGOs, etc.).

In the event of serious and imminent danger, the whistleblower can go directly to **stages 2 or 3.**



WHISTLEBLOWING ALERT COLLECTION AND PROCESSING PROCEDURE

I AM

Employee

External employee or occasional employee of one of the companies that are in the CNIM Group
(temporary worker, trainee, service provider, employee of a subcontracting company, etc.)

A stakeholder internal or external to the Group
(employee of a customer, supplier, etc.)

I must issue my alert internally, in accordance with the Group procedure for collecting and processing alerts.

If I do not comply with this procedure, I cannot benefit from the protective status of whistleblower provided for by the "Sapin II" law.

I WANT TO ISSUE AN ALERT; HOW CAN I DO THIS?

I fill in the whistleblowing report form available in French and English on the [cnim.com](https://cnim.com/groupe/deontologie-ethique-engagements-RSE) website.
<https://cnim.com/groupe/deontologie-ethique-engagements-RSE>

I write an open email and send it to alerte@cnim.com.
I can remain anonymous: in this case, I must use an email address preserving my identity.

I contact my direct or indirect line manager, or the Human Resources Manager who is responsible for me, who will send it to the CNIM Group Ethics Commission via email alerte@cnim.com.

I will receive an acknowledgement of receipt of my alert within seven days.

The CNIM Group Ethics Committee, composed of the Human Resources Director, the Legal Director and the Group Data Protection Officer, will ensure that it has the necessary information, or will contact me if this is not the case, then decide on the admissibility of the alert. Deadline: 20 working days maximum.

IF THE ALERT IS ADMISSIBLE,
it is processed within a so-called "reasonable" period, which varies depending on the investigations to be carried out.

IF THE ALERT IS NOT ADMISSIBLE,
I am informed accordingly.

I am informed of the steps of the procedure at any time.

I AM A MANAGER AND AN EMPLOYEE SENDS ME AN ALERT...

I will send it to the Ethics Committee as soon as possible via alerte@cnim.com



WHERE CAN I GET MORE INFORMATION?

- ▲ At any time, I can contact my direct or indirect line manager, my company's Human Resources Manager or one of the members of the Ethics Commission, who will guide and advise me.
- ▲ The Group's Ethics Charter as well as all of the Group's codes of ethics, whistleblowing procedure and alert form are available online at **cnim.com**, in the **Ethical rules/Ethics section**.

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