

COR-GRC-PROC 1-R1 EN

SOMFY PROCEDURE

WHISTLEBLOWING SYSTEM

SOMFY^s

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1. INTRODUCTION

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1.

INTRODUCTION



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Somfy group has a strategic vision focused on the well-being of people in their homes. True to this vision and its values of integrity, the Group has set up a general whistleblowing system, to enable anyone to report any action of serious concern or conduct contrary to our Ethics Charter. The Group guarantees that these reports will be considered and handled in accordance with current legal and regulatory provisions.

1.

INTRODUCTION



What is the object of this document?

The objectives of the present document is to set out:

- the Somfy group's whistleblowing system,
- the conditions for its use,
- the rights of whistleblowers.

In particular, it falls under the requirements of the French Act on transparency, combating corruption and modernising the economy of 2016, the so-called Sapin 2 Act, amended by the Act of 21 March 2022 (Waserman transposition).



Who is concerned?

This document applies to all Somfy group entities.

It may be locally adapted, according to current law. Contact the Group Ethics and Compliance Division, if applicable.

1.

INTRODUCTION

The Ethics Committee has submitted the whistleblowing system with a view to its implementation to the Social and Economic Committee for the French entities concerned, and to the union organisations of any foreign entities requiring it.

The present procedure is available and accessible:



- on the Somfy group intranet (SharePoint / SGMS doc / "Leading" process);
- via display boards on Group premises;
- via the employer, for external and occasional workers (1).

Further details



- [Ethics charter](#)
- [Ethics memo](#)
- [Anti-corruption code of conduct](#)

1 The term "External and occasional worker" designates in particular interim workers, seconded personnel, service providers' employees, subcontractors' employees, consultants, etc.



2. WHAT IS THE ROLE OF THE SYSTEM?

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2.

WHAT IS THE ROLE OF THE SYSTEM?

Identify the situations concerned



Employees, external or occasional workers, and also Somfy group co-contractors or subcontractors may use the whistleblowing system to report:

- a crime or offence,
- a serious threat or harm to the general interest,
- a breach of or attempted concealment of a breach of:
 - an international commitment duly ratified or approved by the French state,
 - a unilateral act by an international organisation based on such a commitment, European Union law, an Act or Regulation
- a situation contrary to the principles of the Ethics Charter, the Group's Anti-corruption code of conduct or internal regulations.



Actions covered by the following shall be excluded from the scope of the

- national security,
- medical secrecy, or
- confidentiality between a lawyer and client.

2.

WHAT IS THE ROLE OF THE SYSTEM?

Choose the appropriate reporting channel



If you have any questions on how to behave in terms of ethics, you can ask:

- your colleagues,
- your line manager,
- your human resources manager,
- the Ethics and Compliance Division



If these solutions do not seem satisfactory, Somfy group has also set up an Ethics Committee and *an online whistleblowing platform* – accessible by scanning the QR Code, or at compliance.somfy.com/somfy/alert – to enable you to express and report unethical actions, or simply ask questions, *securely and confidentially*.

2.

WHAT IS THE ROLE OF THE SYSTEM?

Uphold confidentiality

The Ethics Committee members shall guarantee the confidentiality of:

- the whistleblower's identity;
- the identity of the person(s) accused by the report;
- the information gathered.

However, it is possible to reveal the identity of:

- the whistleblower, with their consent;
- the person(s) accused, if the report is well-founded.



Any disclosure, outside of the options specified above, may be subject to criminal penalties.

2.

WHAT IS THE ROLE OF THE SYSTEM?

Protect whistleblowers

The report source shall be entitled to whistleblower status if it is made in good faith, there is no direct financial consideration, and if the report falls within the scope of this procedure.



The whistleblower may not be subjected to any reprisals. Hence it is prohibited to:

- remove them from a recruitment procedure, or from accessing any kind of professional training course;
- sanction or fire them;
- take any direct or indirect discriminatory measure against them, in particular in terms of wages, profit sharing or shareholding schemes, grade adjustments, qualification, professional promotion, transfers, or contract renewal.



Any malicious whistleblowing may be penalised. The applicable law varies between countries.



3. WHAT IS THE REPORTING PROCEDURE?

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WHAT IS THE REPORTING PROCEDURE?

How to make a report?

Reports may be made in any official languages of the countries where Somfy group is based, via the following dedicated channel:



INTERNET

By scanning this QR code:



Or at

compliance.somfy.com/somfy/alert

In case of technical difficulties online, you can use:



BY POST

Addressed to:

SOMFY Group Ethics Director

PO Box 230

1215 Geneva, Switzerland

with the word "Confidential"
on the back of the envelope

3.

WHAT IS THE REPORTING PROCEDURE?

How to make a report?

To be eligible for consideration, the report must specify:

- your identity, functions and contact details;
- the factual information required for its processing, avoiding any subjective appraisal;
- the identity and if possible the professional contact details of the person(s) accused.

Can I make an anonymous report?



You can opt to remain anonymous when making a report. However, not revealing your identity may make the Ethics Committee's inquiry more complex, or even compromise it.

So we encourage you to opt out of anonymity, to facilitate the examination of your report. Rest assured that your identity will remain strictly confidential. As a whistleblower, you will also have a protected status, guarding you against any form of reprisals.



If your report concerns a member of the Ethics Committee:

You can send your report to the Managing Director of Somfy group (pierre.ribeiro@somfy.com)

3.

WHAT IS THE REPORTING PROCEDURE?

How are reports processed and examined?



Reports are processed in accordance with the personal data protection rules. Only individuals authorised to manage your report have access to the documents and e-mails stored on the digital whistleblowing platform.

When you submit a report (see *appended diagram*):

- **D+5 at the latest:** the Ethics Committee
 - will acknowledge receipt of your report via your chosen channel;
 - will inform you of your rights, in particular in terms of personal data protection;
- **D+30 at the latest:** the Ethics Committee will inform you of the foreseeable and reasonable time frame required to examine the admissibility of the report. It will tell you whether you need to provide any additional information for the examination of the report, specifying the time you have to provide it. If you do not provide this information within the allotted time, the report will be deemed unusable, and will not be processed. However, you can issue a new report once you have gathered all the information.
- **D+60 at the latest:** it will inform you of whether the report is admissible, and if applicable, tell you the foreseeable and reasonable time frame required to investigate the dossier.

3.

WHAT IS THE REPORTING PROCEDURE?

How are reports processed and examined?

After this time, the Ethics Committee will tell you:

- the next steps in processing your report and the dossier; or
- whether the investigation needs to be extended, and state the foreseeable length of this extension.

Once the report has been deemed admissible, the Ethics Committee will inform the person(s) accused by the report, as well as any other person(s) implicated. It will tell them:

- the name and contact details of the Ethics Director;
- the name and contact details of the individual assigned to processing the report;
- the actions for which they are being accused, or in which they are implicated,
- their rights, in particular in terms of personal data protection.

The identity of the whistleblower will remain confidential, except with the consent thereof.



The Ethics Committee may adopt measures to prevent destruction of evidence. In this case, notification of the person(s) accused by the report or implicated in it will be deferred.

3.

WHAT IS THE REPORTING PROCEDURE?

How are inquiries conducted?

The Ethics Committee will research and verify the reported actions and conduct, while ensuring the necessary confidentiality conditions. To this end, it may:

- hold any interviews it deems relevant, in particular of the person(s) accused,
- authorise the Group's internal audit team to conduct an investigation,
- call on local internal contacts, according to the report type,
- employ service providers to conduct external inquiries.

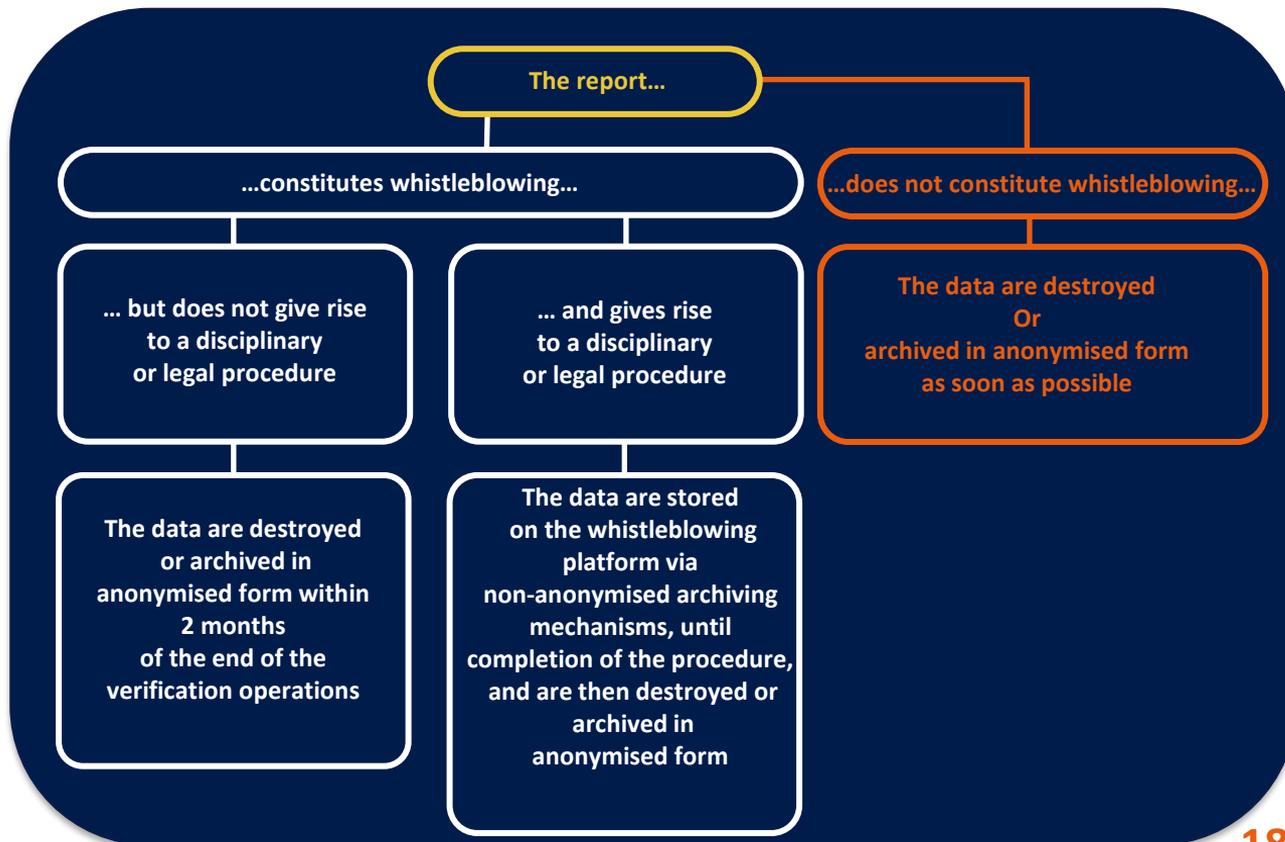


The whistleblower and persons accused will then be informed of the closure of the dossier.

3.

WHAT IS THE REPORTING PROCEDURE?

How are data processed and stored?



3.

WHAT IS THE REPORTING PROCEDURE?

How are data processed and stored?

The Ethics Director upholds the Acts and regulations on personal data protection. Hence anyone identified in the whistleblowing system has the right to:

- access the data about them;
- request correction or deletion thereof, if they are inaccurate, incomplete, erroneous or out-of-date;
- oppose or restrict the processing thereof, without prejudice to compliance with the SOMFY group's legal obligations;
- define instructions regarding the fate of their personal data after their death.

To find out more about how your data are protected under this whistleblowing procedure, please consult the information guide [HERE](#).



The Ethics Director will never share with the person accused in a report information about its source.



4. APPENDICES

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**External or occasional worker**

Designates, among others, interim workers, seconded personnel, service providers' employees, subcontractors' employees and consultants.

Company

Any company belonging to Somfy Group.

Group

The Somfy group, comprising all the companies, French or foreign, controlled by Somfy SA.

Whistleblower

The Somfy employee, or exterior or temporary personnel, issuing an report within the scope set out by the present procedure, if it is made in good faith and there is no direct financial consideration.

Ethics Director

The Group employee overseeing:

- the deployment and monitoring of the anti-corruption compliance programme;
- the Group's ethics policy;
- the whistleblowing system.

Company employee

Any company employee, including:

- those holding a permanent work contract;
- those holding a fixed-term contract;
- part-time employees;
- apprentices;
- trainees.

4.

APPENDICES

Composition of the Ethics Committee

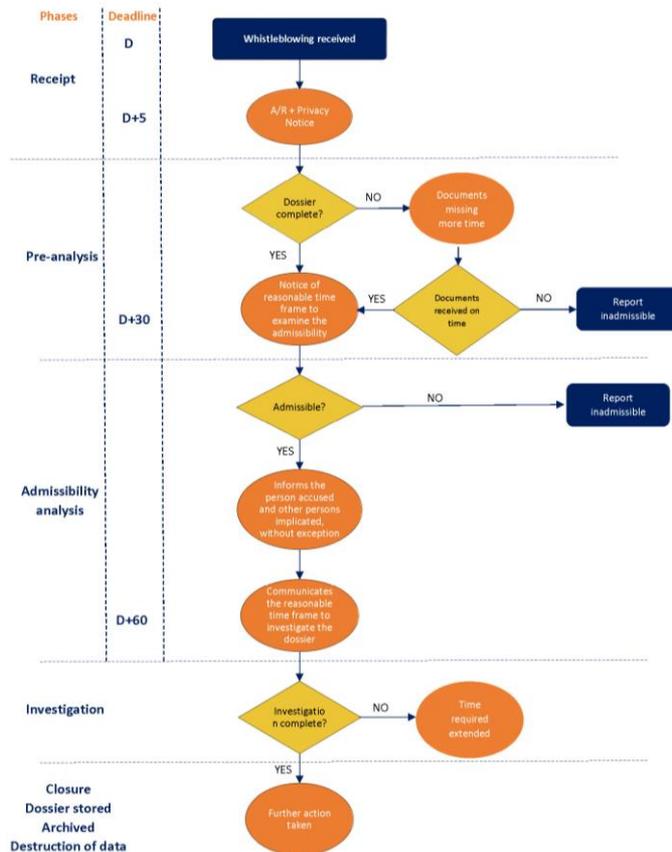
The Somfy Ethics Committee comprises the Ethics Director and permanent members. They have been chosen for their integrity and knowledge of ethical issues.

- **Yann Barou**, **Business**: yann.barou@somfy.com
- **Séverine Dangel**, **Ethics Director**: severine.dangel@dsgsomfy.com
- **Valérie Dixmier**, **Human Resources**: valerie.dixmier@somfy.com
- **Delphine Martin**, **Legal**: delphine.martin@somfy.com

4.

APPENDICES

Ethics report processing times





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Ethics Committee



Thank you