

At TOTEM, our commitment to integrity leads us to scrupulously respect the duty of honesty in the conduct of our business activities. This requirement calls for exemplarity, particularly from management, as well as the commitment to exemplarity we all make ourselves when going about our jobs.

If you see behavior that is unethical or contrary to our policies and procedures in your work environment, TOTEM encourages you to share your concerns with your manager or ask him or her for help or advice. If you are not in a position to do this or if you feel it would be inappropriate to approach your line management, you may ask for advice from your human resources manager, your legal department, your Compliance Officer, your ethics advisor or, if necessary, you can «blow the whistle» and file a whistleblowing report.

TOTEM has chosen to use Orange Group whistleblowing System, but with guaranteeing a perfect seal on messages, which will only be distributed and processed by players belonging to TOTEM. This tool is available for all TOTEM internal (employees) and external (counterparts, partners, customers, ...). You can reach it there : <https://orange.integrityline.org>

Why should I file a whistleblowing report?

The whistleblowing system is intended to support the TOTEM Ethics, Compliance and CSR approach: by filing a report, you help the company identifying problems and resolving them. By allowing TOTEM to operate in compliance with our anti-corruption policy, laws and regulations, you help sustaining our activity by reducing risks to our reputation and financial losses.

However, using the whistleblowing system is optional, and no disciplinary actions will be taken against any employee for not using it.

What is whistleblowing?

If you personally know about behaviors or situations contrary to our anti-corruption policy, our code of ethics, or to our policies and procedures related to accounting, internal control, audit, or serious and clear violations of laws or regulations, or serious violations of human rights and fundamental freedoms, health and safety of people or the environment, you can report this information in good faith and without personal interest using TOTEM whistleblowing system.

Facts covered by national defense secrecy, patient-doctor confidentiality or lawyer-client confidentiality are excluded from the whistleblowing system.

Likewise, the whistleblowing system is not intended for routine human resources matters such as queries about remuneration which should be addressed to local management and/or HR teams, or customer claims which should be directed to the local customer relations teams.

What is a whistleblower?

A whistleblower is an employee or casual or external employee who reports, selflessly and in good faith, a behavior or a situation that is contrary to the items identified in the preceding paragraphs and of which they have personal knowledge, using the whistleblowing system.

How are whistleblowers protected?

TOTEM commits to ensuring that no employee is sanctioned, dismissed or subject to any direct or indirect discriminatory measures for using the whistleblowing system selflessly and in good faith for events they have personally witnessed.

TOTEM also commits to ensuring that procedures put in place to collect the reports guarantee that the whistleblower's identity and the information collected through the whistleblowing system remain strictly confidential in compliance with applicable laws and regulations.

The use of the system in good faith, even if the facts subsequently prove to be incorrect or give rise to no further action, will not expose the whistleblower to the risk of disciplinary action. However, abusing this system can lead to disciplinary sanctions for the whistleblower, as well as legal proceedings.

Who guarantees my protection as a whistleblower?

TOTEM whistleblowing system is managed by TOTEM Compliance Officers for all reports (behaviors or situations contrary to our anti-corruption policy, our code of ethics, our politics and procedures related to accounting, internal control, audit, and serious and clear violations of laws or regulations, serious violations of human rights and fundamental freedoms, health and safety of people or the environment) in full compliance with all laws and regulations. TOTEM Group and affiliates Chief Compliance Officers

are responsible for guaranteeing the protection that TOTEM provides to employees who report an incident via the whistleblowing system. They report about this mission to TOTEM Ethics&Compliance Committee.

At least once a year, the TOTEM Chief Compliance Officers present the Ethics&Compliance committee an anonymous report of the whistleblowing reports filed and the subsequent actions taken.

Do I have to reveal my identity, or can I remain anonymous?

TOTEM encourages you to identify yourself when filing a report: it helps us to protect you, to ask you for additional information if needed, and to avoid false allegations.

An anonymous report will only be accepted and processed if it enables us to establish the seriousness of the events and if it provides enough factual details.

How do I file a whistleblowing report?

You can file your whistleblowing report using TOTEM whistleblowing system at the following URL: <https://orange.integrityline.org>. The tool is the same for all TOTEM entities (you will be able to choose your TOTEM entity : Spain, or France, or Group, at the beginning of the process).

What happens once I have submitted a report on <https://orange.integrityline.org>?

Reports are collected and followed up by the TOTEM Chief Compliance Officers of each entity, in collaboration with the HR director of the entity, except if they are directly concerned by the alert: in this case, it is transmitted directly to the entity CEO.

You then receive an acknowledgement of receipt for your alert as soon as possible, except if you have submitted a report that is clearly not serious or is based on unverifiable facts, which will be closed without further action. The person in charge of following up on the report will perform a preliminary assessment to ensure it is admissible.

The preliminary assessment involves, among other things, answering the following questions :

- does the report fall within the scope of the system ?
- is the content of the report based on objective information directly related to the scope of the system?
- do the facts, information or documents provided in the report support the claim?
- if the whistleblower is anonymous, is the seriousness of the facts established and are the factual elements adequately detailed?

If the relevance of the information appears to be inadequate, the person responsible for following it up asks the whistleblower for further information, and if this is not available, the report may be closed without further action.

If it appears that the report does not meet one or more of the criteria described above, it is declared inadmissible by the person responsible for following it up. This person then informs the whistleblower and, if necessary, may suggest another, more appropriate channel: for example customer services for sales claims, management or human resources for remuneration-related issues, etc.

In other cases, the report is declared admissible and is investigated to establish the facts. The whistleblower is informed within seven calendar days, via the platform's secure mailbox, about whether the report is admissible and on the opening of an investigation.

The investigation is conducted under the supervision of TOTEM Chief Compliance Officers. The investigation team, mainly made up of the Compliance officers of the entity concerned, is restricted, duly authorized and subject to an enhanced obligation of confidentiality. It conducts the investigation rigorously and professionally in compliance with laws and regulations.

The person(s) targeted by a report that has been declared admissible is be informed of the existence of the report, strictly respecting the confidentiality of the whistleblower's identity. Every effort is be made to avoid any prejudice to persons who are wrongly or slanderously accused by a report.

What happens once the investigation is over?

At the end of the investigation, a report detailing the findings is shared with the relevant people. Depending on the findings of the report and the seriousness of the facts established, further investigation may be requested, and proportionate disciplinary measures may be taken in accordance with the internal regulations and related procedures.

If necessary, the legal authorities take on the case. In addition, the necessary adaptations to procedures is be proposed to prevent similar behavior or incidents from occurring. The whistleblower is be informed of the conclusion of the procedures within a reasonable time following the end of the investigation and the implementation of any ensuing disciplinary or other measures.

How is the data related to a report processed?

The data and information processed within the whistleblowing system is only be used for the purposes described in this procedure. The processing also guarantees that the identity of the whistleblower, the identity of the person(s) targeted by the report, and the reports received remain strictly confidential. The report is processed in compliance will all applicable personal data processing rules.