# WHISTLEBLOWING POLICY USER GUIDE

The Company has established a whistleblowing policy (referred to as "internal whistleblowing policy" or "whistleblowing right") in accordance with the provisions of French law No. 2016-1691 of December 9, 2016 on transparency, anti-corruption and the modernization of the economy (the "Sapin II law").

The whistleblowing right is a policy allowing the Company manager and employees to report **acts involving corruption and situations that constitute a violation of the Company's anti-corruption policy**. This system is not designed to replace other whistleblowing systems set up in accordance with applicable regulations in the Company, including reporting lines and staff representative bodies.

## 1. Scope of application

The whistleblowing policy enables any employee or manager of the Company to report the existence of conduct or situations that constitute a violation of the anti-corruption policy.

In case of doubt regarding the application of this policy, please contact management at the following address: <a href="mailto:legal@jacquetmetals.com">legal@jacquetmetals.com</a>.

## 2. Exercising the whistleblowing right

If an employee or manager of the Company becomes aware of suspected misconduct falling within the scope of application of the internal whistleblowing policy, he or she may exercise this right.

Suspected misconduct may be reported:

- either via the "Internal whistleblowing policy" section of the intranet site; these disclosures are received by the general management;
- or by writing to **the general management** at the following address: Jacquet Metal Service, 44 Quai Charles de Gaulle, 69006 Lyon, France.

Whistleblowers must provide a precise description of the facts of which they are aware and supply any information or documents they hold in support of their disclosure. They may attach their contact details to their disclosure to enable communication with the recipient (email address, telephone number, etc.).

## 3. Handling of disclosures

Unless the disclosure is made anonymously, the whistleblower will be notifed of:

- the receipt of the disclosure. If necessary, the Company will contact the whistleblower to obtain further information;

- the manner in which the disclosure has been handled and any corrective measures adopted;
- the closure of the verification procedure.

## 4. Confidentiality

The internal whistleblowing policy guarantees confidentiality and respect for the rights of each individual during the handling of the procedure.

Persons responsible for collecting and handling professional disclosures are also required to observe confidentiality.

## 5. Storage of documents

All data regarding unjustified disclosures will be promptly deleted. Data regarding justified disclosures will be deleted two months following closure of the verification procedure.