

ELECTRA

Whistleblowing Policy

Introduction

At ELECTRA, we are committed to maintaining an ethical, transparent, and compliant workplace. This Whistleblowing Policy is designed to provide a safe and confidential environment where employees and stakeholders can report unethical behavior, illegal activities, or violations of company policies without fear of retaliation. By fostering open communication, we aim to ensure the highest standard of integrity across all aspects of our organization.

Scope

The Whistleblowing Policy is a reference document intended for all Electra employees, directors and shareholders wherever located, or any other stakeholder.

Purpose and Commitment

The purpose of this Policy is to:

- Encourage employees to report concerns about misconduct or unethical behavior.
- Ensure that reports are treated seriously and investigated appropriately.
- Protect whistleblowers from retaliation and ensure their confidentiality.
- Comply with applicable laws and regulations, such as the EU Whistleblower Directive and relevant local laws.

Definition

“Whistleblowing” refers to the act of reporting concerns related to **illegal, unethical, or non-compliant behavior** within the organization.

Employees are encouraged to report any suspected wrongdoing, including but not limited to:

- Fraud, corruption, or financial misconduct.
- Violations of laws or regulations (e.g., health and safety, data protection).
- Discrimination, harassment, or workplace bullying.

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- Conflicts of interest or unethical behavior.
- Activities that endanger the environment or public health
- Breaches of Company policies.

Reporting Channels

Electra provides multiple confidential channels for employees and stakeholders to report concerns:

1. **Primary Reporting Channel:** Employees can report concerns via **Lucca**, Electra's designated whistleblowing platform for employees. For more information on how to use, please consult the detailed process [here](#).
2. **Alternative Reporting Methods:**
 - **Email:** Reports can be submitted confidentially to ethics@go-electra.com.
 - **Direct Contact:** Reports can also be made directly to an immediate manager or **Human Resources representative**, who will escalate the concern to the **Chief People Officer and Legal Department**.

Anonymous reporting is available through Lucca. Employees are however encouraged to provide their identity to facilitate a thorough investigation, but this is not mandatory.

Confidentiality & Data Protection

All reports will be received by our **Chief People Officer** (@Marie Lenail-Chouteau) and **VP Legal** (@Cécile Derenne). All reports will be treated with the utmost **confidentiality**. Information will only be shared with individuals directly involved in the investigation and resolution process.

Anonymous reporting is available, and no attempts will be made to identify whistleblowers who choose to remain anonymous.

Investigation Process

Each report will be assessed and investigated based on its nature and severity. The process includes:

1. **Acknowledgment of Report:** Whistleblowers (if identified) will receive confirmation of report receipt within 10 business days.
2. **Preliminary Assessment:** The **Chief People Officer or Legal Department** will evaluate the claim.

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3. **Investigation:** Internal or external experts may be appointed to conduct a thorough investigation. The employee and any relevant witnesses may be interviewed.
4. **Resolution & Action:** Appropriate corrective measures will be taken which may include disciplinary actions, mediation, or any other suitable measures. The whistleblower (if known) will be informed of the outcome.

Protection Against Retaliation

ELECTRA strictly prohibits retaliation against whistleblowers who report concerns in good faith. Any form of intimidation, harassment, or adverse action as a result of whistleblowing will not be tolerated. Retaliatory actions may lead to disciplinary measures, up to and including termination.

Good Faith Reporting & False Allegations

Whistleblowers must act in **good faith** and have reasonable grounds for believing that the information provided is accurate. **Malicious, false, or knowingly misleading reports** will be treated as a serious disciplinary offense.

Policy Review & Amendments

This Policy will be periodically reviewed and updated to ensure compliance with the **EU Whistleblower Directive** and relevant local laws.

Commitment

Our leadership is fully committed to ensuring a safe, transparent and ethical work environment for employees and stakeholders. We encourage all employees to speak up without fear and to use the whistleblowing channels provided to help us address and prevent misconduct. Together, we can uphold our shared values and maintain the trust of our employees, stakeholders, and the public.



Aurélien de Meaux,

President Electra