

CODE OF CONDUCT

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Vers.	Status	Date	Author	Description	Verified by	Approved by
01	C	15/01/2021	CSa	Approved	CD	CD

A = Published for comments - B = Published for approval - C = Approved

Table of contents

PREFACE 3

1. INTRODUCTION 4

2. DEFINITIONS 4

3. APPLICABILITY OF THIS CODE OF CONDUCT 4

4. MANAGEMENT OF THE PRINCIPLES OF ETHICS 4

 4.1 Chief Executive Officer (CEO)4

 4.2 Group Compliance Officer4

 4.3 Compliance Officers of the Related Entities of the Group5

 4.4 Reporting, control and audits6

5. RESPONSIBILITIES 6

6. DEFINITIONS AND ILLUSTRATIONS OF CORRUPTION AND INFLUENCE PEDDLING 6

 6.1 Definitions:6

 6.2 Illustrations:7

7. GIFTS AND INVITATIONS, FACILITATION PAYMENTS, CONFLICTS OF INTEREST, PATRONAGE, SPONSORSHIP AND LOBBYING 7

 7.1 Accepting gifts or rewards7

 7.2 Offering gifts or rewards8

 7.3 Facilitation payments9

 7.4 Conflicts of interest10

 7.5 Corporate sponsorship, patronage and philanthropy11

 7.6 Lobbying11

8. PENALTIES – DISCIPLINARY REGIME 11

9. COMMUNICATION REGARDING ETHICS 11

 9.1 Documents11

 9.2 Ethics training11

 9.3 Asking for advice11

 9.4 Whistleblowing system12

PREFACE

According to Article 17 of French law no. 2016-1691 of 9 December 2016 (known in France as “Loi Sapin II”), the CEOs and/or Managing Directors of companies of the size of DORIS (i.e. employing a certain minimum number of employees and generating a certain turnover) must implement internal procedures to prevent and detect any act of corruption and influence peddling in France or abroad.

The DORIS Ethics Charter reflects DORIS' commitment to these values.

Integrity is the very foundation of the financial health and stability of any business over the long term. Conscious of this fact, DORIS seeks to apply, within the framework of its activity, the highest standards of ethics. Respect for the values of honesty and fair competition is a key factor in DORIS' culture and success.

This Code of Conduct, which reflects DORIS' commitment to fighting corruption and influence peddling, was designed to help all our Employees (as defined below) understand the risks associated with certain actions, to identify the circumstances that could lead to this type of action and to respond appropriately to these situations with the help of colleagues and Management.

The document “Professional ethics: some key notions” reflects DORIS' other commitments to ethics and professional conduct, and each employee is requested to read it.

Every Employee of DORIS has an important role to play in upholding the rules of ethics.

We would like to emphasise that our ethics policy has no tolerance for any deviations in terms of corruption and influence peddling and that I have confidence in the support of all employees in this regard.



Christophe Debouvry
Chairman & Chief Executive Officer

1. INTRODUCTION

Present on the international scene since 1965, awarded *Distinguished Achievement Award* in 2006 at the Offshore Technology Conference (“OTC”), DORIS is recognised as a leading international player in the field of engineering services for the oil industry.

The purpose of this Code of Conduct is to ensure that DORIS’ principles of conduct against corruption and influence peddling are sustainable over time.

2. DEFINITIONS

Related Entity any entity (including subsidiaries and participations) controlled or managed by DORIS Group, as parent company.

Employee any DORIS staff member or worker (permanent or temporary).

DORIS DORIS Group and its Related Entities.

Compliance Management System consists of the following documents:

Ethics Charter the document 110-0004-19-POL-0245-EN

Code of Conduct the document 110-0004-19-DOC-0246-EN

Ethics Notice Report the document 110-0004-19-REP-0247-EN

Key Notions Document the document 110-0004-19-DOC-0248-EN

Due Diligence the document 110-0004-19-DOC-0249-EN

3. APPLICABILITY OF THIS CODE OF CONDUCT

This Code of Conduct applies to all activities carried out by DORIS Group and the Related Entities and concerns all Employees, without prejudice to the application of more stringent local codes of conduct and anti-corruption provisions where applicable. Each entity of DORIS applies the same ethical precepts by adapting them under the principle of subsidiarity, in accordance with local laws, certain aspects of the local culture and the policies established by the entity’s Management, as long as these provisions are compatible with or more stringent than the Sapin II law in preventing and combating corruption and influence peddling.

4. MANAGEMENT OF THE PRINCIPLES OF ETHICS

4.1 Chief Executive Officer (CEO)

The Chief Executive Officer of DORIS Group (or Chairman and CEO, as the case may be), the group’s parent company, is ultimately responsible for defining DORIS’ principles of ethics and for ensuring that they are properly implemented, using the Compliance Management System in place and through the teams presented in the following paragraphs.

4.2 Group Compliance Officer

At the Group level, the Chief Compliance Officer is appointed by the Chief Executive Officer, to whom he reports.

He ensures the proper application of DORIS’ principles of ethics and compliance within the different Related Entities. With this in mind, he is responsible for:

- Promoting an ethical culture at DORIS;
- Communicating on the various aspects and precisely identifying responsibilities in matters of ethics within each Group entity;
- Working in synergy with the Compliance Officer of each Related Entity;
- Managing the ethics statistics relating to the performance of each Related Entity of the DORIS group, in particular with regard to the activities subcontracted during the implementation of projects;
- Drafting and presenting DORIS' annual ethics report to the Chairman and Chief Executive Officer, the Management Committee and the Board of Directors.

The Chief Compliance Officer is required to maintain strict confidentiality regarding the information obtained for the performance of his duties.

4.3 Compliance Officers of the Related Entities of the Group

Every Related Entity has an appointed Compliance Officer who is responsible for implementing and ensuring compliance with DORIS' principles of ethics within that entity.

In this respect, the main components of his function are:

- To promote the ethical culture of the entity;
- To communicate and, if necessary, explain the charters, codes or directives on which DORIS' ethical commitments are based, to the Employees, in close collaboration with the Management of the entity;
- To identify the ethical risks faced by the entity;
- To conceive or supervise the preparation of ethics documents specific to the geographic area or the activity of the entity in question;
- To ensure the application of the principles of ethics in the preparation of development strategies of the entity and its activity;
- To organise awareness, training and communication initiatives;
- To conduct internal audits and inspections for the analysis and monitoring of ethics performance within the entity;
- To implement the necessary corrective actions following the audit results, for effective continuous improvement of the system, within the entity;
- To manage the "Ethics Notification Report" system implemented to record, analyse, correct and monitor incidents or near-misses occurring within the entity;
- To monitor the application of the principles of ethics used to draft the entity's annual compliance report to be forwarded to the Chief Compliance Officer;
- To maintain performance statistics of the entity and those for activities subcontractor for projects.
- To inform, communicate and act in synergy with the Chief Compliance Officer.

In all circumstances, the Compliance Officers are required to strictly respect the confidentiality of the information communicated to them. A Compliance Officer must not, under any circumstances, reveal the name of a person accused of a violation or an informant without express written authorisation.

4.4 Reporting, control and audits

In each Related Entity, Compliance Officers are required to conduct regular internal audits and inspections. They must also prepare an annual progress report concerning ethics and compliance organisation within their respective entities, as well as measures and initiatives implemented within the entity with respect to ethics.

All the information contained in these reports is included in the DORIS Annual Ethics Report prepared by the Group Compliance Officer.

The Chief Compliance Officer then submits the Annual Report to the Chairman and Chief Executive Officer, the Management Committee and the Board of Directors.

5. RESPONSIBILITIES

In their daily conduct and their way of working as well as in their relations with third parties, all Employees must:

- Apply the principles of ethics contained in the Code of Conduct

AND

- Promptly report any irregularities found, so as to avoid financial losses and protect the good reputation of DORIS.

Every Employee must read the Code of Conduct in full and comply with its principles. The line managers must ensure that each Employee working under their responsibility is able to raise questions and receive appropriate guidance and responses.

The Code of Conduct is given to every employee of DORIS Group and is available on the DORIS intranet. No employee can claim not to have knowledge thereof.

6. DEFINITIONS AND ILLUSTRATIONS OF CORRUPTION AND INFLUENCE PEDDLING

6.1 Definitions:

Corruption: Corruption is the act by which a person in a particular public or private office solicits/proposes or agrees/assigns a gift, an offer or a promise, with a view to performing, delaying or failing to perform an act, directly or indirectly, within the scope of his duties.

Corruption is deemed active for persons who reward favours and passive for those who accept the benefit.

Influence peddling: Influence peddling is the act of a person (public or court official, individual, international public or international justice official), of soliciting or approving, without any right, at any moment, directly or indirectly, offers, promises, gifts, presents or any benefits for himself or for others to abuse or have abused his real or supposed influence in order to obtain preferential treatment, jobs, contracts or any other favourable decision from an authority or a public administration.

Influence peddling is deemed active for persons who reward the use of influence by the official concerned and passive for those who use their influence.

6.2 Illustrations:

Corruption is prohibited in all its forms, whatever the moment or place and in all circumstances.

The following examples illustrate situations in which an employee is likely to face an act of **corruption**:

- Offering a vacation to the decision-making person within the client's organisation in order to obtain a favourable decision
- Accepting a gift from a supplier in exchange for a favourable intervention for an order
- Accepting a gift from another employee seeking to alter the recording of certain transactions or have some data deleted
- Major discounts granted in order to obtain a favourable decision/intervention
- Performing services for free or for less than the market price for the benefit of third parties

The following examples illustrate situations in which an employee is likely to face an act of **influence peddling**:

- Offering a gift to a relative of a public official in order to use his influence with the latter to obtain a favourable decision
- Granting a job to a family member of a public official to obtain a favourable decision from the latter
- Hiring a public official as a consultant to help obtain a favourable administrative decision through the influence of the person concerned on the decision-maker within the administration concerned.

7. GIFTS AND INVITATIONS, FACILITATION PAYMENTS, CONFLICTS OF INTEREST, PATRONAGE, SPONSORSHIP AND LOBBYING

7.1 Accepting gifts or rewards

DORIS strictly limits the acceptance of rewards from clients, suppliers or other persons who may seek to influence the company's actions. No Employee has the right to accept any reward, regardless of its value, which may influence, attempt to influence or give the impression of being able to influence his judgment.

The following acts are unacceptable under any circumstances:

- Accepting cash donations, regardless of the donor;
- Accepting any rewards for services provided (Employees may accept a gift if it is not cash, if it is spontaneous, of small value and if it has not been offered for receiving favourable treatment for obtaining a contract);
- Direct or indirect solicitation of gifts from clients or suppliers;
- Accepting payments, loans, bribes or kickbacks from anyone;
- Accepting gifts from suppliers who participate in a tendering process.

As a general rule, DORIS forbids accepting any proposal from clients or suppliers, which seeks to cover expenses for travel, meals or accommodation as part of seminars, conferences or other events. This also applies to tickets for sports events or other public events.

In the event that it is considered beneficial for the company that an employee attends an event to which he has been invited by a client, the expenses related to this event will be borne by DORIS. There are, however, exceptions to this general rule, for example, if the Chairman and CEO, the Chairmen concerned, or the CEOs directly reporting to the Chairman and CEO give their approval.

The Employees of DORIS may accept meals, drinks or other discrete forms of hospitality or entertainment from clients or suppliers as a courtesy, in the normal course of their business, provided that:

- These offers are not made for the purpose of receiving favourable treatment in connection with obtaining a contract;
- These offers cannot be interpreted as an attempt to influence our actions;
- This practice is not widespread and recurrent;
- The value and frequency of these offers are not excessive.

However, even in these circumstances, these hospitality offers must be reported to the manager. If a client or a supplier offers entertainment considered more than “modest”, Employees must obtain permission from their supervisor before accepting the invitation.

If an Employee refuses a gift, he must explain to the person offering it to him that DORIS's policies prohibit him from accepting it.

If they have questions or suspect violations of these conditions, employees must consult with their supervisor or the Compliance Officer.

7.2 Offering gifts or rewards

This chapter discusses the policies for gifts, meals, and entertainment offered to clients, including Public Officials.

DORIS does not buy contracts and bases its success on the quality of its products and services as well as on its commitment to satisfy its clients.

The Employees of DORIS must resist any offer of benefits such as gifts, meals, entertainment or other personal benefits. They are not authorised to offer gifts or any benefits mentioned above in exchange for a contract with a client or any undue advantage.

Gifts

Practices related to gifts vary by country. Gifts are generally offered in a spirit of goodwill, while in some parts of the world, refusing to accept a gift is considered an insult by the person offering it. Conversely, accepting a gift can generate a conflict of interest. In addition, gifts offered or accepted for the purpose of obtaining a contract or competitive advantage may be considered bribes or kickbacks.

Offering low value items to promote, explain or provide a demonstration of the products or services marketed by DORIS is permitted. This includes pens, coffee cups and other items, provided they are:

- Offered out of courtesy, as a sign of respect or gratitude, or to thank someone for their hospitality, according to the customs of the country;
- Unambiguously appropriate in form and value,
- Offered occasionally;
- Duly recorded (as gifts) in DORIS' accounting books.

The following items or services must not be offered to a client under any circumstances:

- Cash;
- Watches and jewellery;
- Mobile phones;
- Computers, tablets and other electronic equipment;
- Clothing;
- Sports equipment;
- Shares or other securities;
- Gift certificates;
- Air tickets or other types of transportation;
- Job offers;
- Scholarships;

and other similar items or services.

Meals and entertainment

DORIS may offer a customer modest and customary meals or other forms of entertainment as a courtesy in the normal course of business.

Recurring, excessive or extravagant business meals or forms of entertainment are prohibited as they may give the impression or suggest that favours are expected in return.

The number of DORIS Employees attending an event must be similar to the number of participants from the client side, and at least one Employee must always be present.

Another example of appropriate behaviour regarding invitations (as long as they are allowed by local laws) is "reciprocity": never invite a client to a place where they would not be able to reciprocate the invitation.

If they have questions or suspect violations of these conditions, Employees must consult with their supervisor or the Compliance Officer.

7.3 Facilitation payments

Definition:

Facilitation payments or "baksheesh" are low-value payments designed to obtain, usually from public officials, routine services that DORIS would normally not be qualified to receive. This may involve obtaining permits, telephone or electrical connections or the customs clearance of equipment.

DORIS does not distinguish between facilitation payments and bribes:

- Facilitation payments are prohibited except in cases involving threats to physical integrity or property damage (as shown below);
- It is also prohibited to make facilitation payments on behalf of DORIS.

Any request regarding any type of payment, loan, gift, favour, financial benefit or any other valuable item from anyone must be immediately reported to the Management and/or the Compliance Officer.

7.4 Conflicts of interest

Definition:

A **conflict of interest** is a situation in which the judgment of a person acting in a professional capacity may be influenced by a secondary interest, distinct from that of the company he represents.

All Employees must avoid commercial, financial and family relationships that could place them in a position of conflict between their own interests and those of DORIS. Should this occur, the Employee concerned must immediately inform his supervisor and/or the Compliance Officer.

In case of doubt, the Employees are advised to check if there is a conflict of interest by contacting their supervisors and/or the Compliance Officer.

The following situations may reveal a conflict of interest:

- When, in the performance of his duties, a person is currently or has been in the last 12 months, in relation with a family member, friend or relative who is employed or works for a client, a third party or a competitor of DORIS, and that person may influence or have influenced professional decisions.
- When the person is involved or seeking to be involved as an employee, owner, consultant, or representative of an entity that operates in the same field as DORIS or that counts DORIS among its clients or suppliers.
- When the person is currently involved or has been involved in the last 12 months, in the governance of a commercial or non-profit organisation, and who is a client, partner or competitor of DORIS.
- When a person, his family members, close relatives or friends have a substantial financial interest or have a substantial holding in a company that is a client, supplier, partner or competitor of DORIS.

7.5 Corporate sponsorship, patronage and philanthropy

Initiatives of corporate sponsorship, patronage and philanthropy are authorised under the DORIS policies. They reflect our citizen-oriented and socially responsible approach. Only persons authorised by the Chairman and Chief Executive Officer or Chief Executive Officer may order and set up such operations.

7.6 Lobbying

Definition:

Lobbying refers to the promotion of the interests of DORIS through the communication of objective, economic and technical data about the company to opinion leaders and/or leaders of communities in which the entities are based. The purpose of lobbying is to improve the reputation of DORIS, to promote its image, values, activities and services and to defend its interests.

Lobbying can only be carried out at the initiative of the Chairman and Chief Executive Officer or Chief Executive Officer of the Entity.

8. PENALTIES – DISCIPLINARY REGIME

In case of infringement of this Code of Conduct by DORIS Group Employees, sanctions and disciplinary procedures shall be taken in accordance with the French “Code du Travail”. For Related Entities; local laws shall apply.

9. COMMUNICATION REGARDING ETHICS

9.1 Documents

All ethics-related documents must be accessible, within each Related Entity, in paper form or on the entity's Intranet.

9.2 Ethics training

Each Related Entity of DORIS will be required to provide training on all topics covered in the Code of Conduct. Training sessions can be organised both on-site and online.

9.3 Asking for advice

The variety and diversity of possible situations do not allow us to plan for all potentially existing cases. Therefore, to find a solution in accordance with the principles of ethics, it is sometimes necessary to seek advice.

Depending on the nature of the questions he intends to ask, any Employee may approach a Colleague, the Management – starting with his direct supervisor (or his department head)

– or any other person in charge having the competence needed to answer the question (human resources, safety, legal etc.) and, of course, a Compliance Officer.

9.4 Whistleblowing system

In order to encourage an irreproachable professional ethic and preserve the trust of its clients and partners, DORIS has set up a whistleblowing system.

This allows its external and occasional collaborators and employees to report problems and possible violations of the group's code of conduct concerning corruption or influence peddling and, more generally, of the treaties, laws and regulations in force, which they are personally aware of in the context of their activity.

The use of the alert system is optional, and DORIS will not take any action with regard to external and occasional collaborators and employees who do not use it. However, this system is complementary to the traditional means of reporting and does not relieve from their responsibility those persons who would be required to make certain mandatory notifications in the specific cases in which the French criminal law so provides.

Such a reporting system implies that personal data are processed by the DORIS entity that employs or works with you (this entity is to be treated as the controller). The national data protection authority has authorised the implementation of this reporting system.

The processing of personal data implemented in this respect is based on compliance with the obligations of DORIS under Law no. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of the economy.

The operating procedures of the alert system and the terms for the processing of personal data collected using this system are presented below.

9.4.1 Breaches that are likely to be reported

What can be reported?

The following may be reported (hereinafter the “Alert(s)”):

- by DORIS employees:
 - o any conduct or situation contrary to the group's code of conduct vis-à-vis corruption or influence peddling;
- by external and occasional employees and collaborators of DORIS Group:
 - o crimes or offences;
 - o serious and evident violations of an international commitment duly ratified or approved by France, a unilateral act of an international organisation taken on the basis of such a commitment, the law or regulations; or
 - o serious threats or harm to the public interest.

These Alerts must be made in an impartial manner and in good faith for acts that are personally known to the persons raising the Alert.

Facts, information or documents covered by the national defence secrecy, medical confidentiality and lawyer-client confidentiality cannot be the subject of an alert in the context of this system.

9.4.2 Procedure for raising an Alert

Why do we need to report these issues?

Because it helps institutionalise and reinforce DORIS' ethics-based culture and allows you to take the necessary steps to put an end to potential irregularities that could affect the reputation of DORIS and Related Entities.

Who should we alert?

Any external and occasional employee or collaborator who has direct and personal knowledge, whether as a victim or as a witness, of illegal or unethical practices falling within the aforementioned scope must contact the Compliance Officer of his own entity or the Chief Compliance Officer.

How should one proceed?

Any serious and sensitive concerns must be reported by completing an "Ethics Notification Report" ("ENR") and handing it over or sending by email to the Chief Compliance Officer and/or the Compliance Officer of your own entity. The email addresses are given on the ENR sheet.

Subsequently, the Chief Compliance Officer and/or the Compliance Officer of the entity concerned will take and coordinate the actions required to remedy the situation.

A template of an "Ethics Notification Report", can be obtained in paper form and/or on the intranet of each entity.

The identity of the person issuing an Alert and all the information collected will remain strictly confidential. For his part, the person issuing an Alert also undertakes to keep strictly confidential the issues that have been reported.

Each entity of DORIS Group provides its external and occasional employees and collaborators with a dedicated email address to contact the Chief Compliance Officer or the Compliance Officer of the entity concerned in case of any doubt about the procedure to be followed or to report violations of the rules of ethics and compliance.

The person who issues the Alert is called the "Whistleblower". The person receiving the Alert (i.e. the Chief Compliance Officer and/or the Compliance Officer of the entity concerned) is called the "Alert Recipient".

9.4.3 Good Alert Practices

When reporting a breach, it is important to accurately describe the situation by indicating the objective facts, the dates on which they were committed, the names of the persons involved, and to present the available evidence necessary to verify the allegations (reports, documents, letters, etc.) so that a thorough investigation can be carried out.

The wording used to describe the nature of the facts reported must reveal their presumed nature. Only the data necessary for the examination of the merits of the Alert must be communicated.

The Whistleblower must strictly preserve the confidentiality of this information and is released from this obligation only in the absence of due diligence on the part of the Alert Recipient.

The Whistleblower also provides the elements allowing, if necessary, an exchange with the Alert Recipient.

9.4.4 Anonymous alerts and data confidentiality

Anonymous Alerts are not encouraged as they make it difficult to conduct an in-depth investigation to establish the facts and protect the whistleblower.

The Alert Recipient as well as the relevant internal teams that need to know about the alert take all the necessary precautions to preserve the confidentiality of the data communicated or kept in the context of the whistleblowing system, including data relating to the identity of the Whistleblower, the facts included in the Alert and the identity of the persons concerned by the Alert. In particular, data processing is accessed by an individual login ID and password, which is regularly renewed, and the identity of the Whistleblower is considered confidential so that he does not suffer any consequences as a result of his action.

DORIS Group undertakes to keep strictly confidential the identity of the persons who issue Alerts. In particular, the identity of the Whistleblower will not be communicated to the persons potentially implicated, even in the event that they exercise their right of access.

DORIS Group will disclose the identity of the Whistleblower only with the consent of that person and the identity of the person in question only after the Alert has been substantiated.

However, the following may still be disclosed to the judicial authority if they so request:

- the identity of the Whistleblower;
- the identity of the person implicated by the Whistleblower.

Anonymous Alerts will be processed only if the seriousness of the facts mentioned is established and the Alert is supported by sufficiently detailed factual information. A Whistleblower who wishes to remain anonymous is also requested to provide the Alert Recipient with the means to contact him in order to facilitate the investigation of the facts giving rise to the Alert.

9.4.5 Use of the whistleblowing system and prohibition of penalties and discriminatory measures

The use of the alert system in good faith and in an impartial manner shall not expose the Whistleblower to any penalty whatsoever, even if the facts subsequently prove to be inaccurate or give rise to no further action. In particular, these persons will not be excluded

from any recruitment procedure, or from access to training or internships, and will not be discriminated against, directly or indirectly, in terms of remuneration, profit-sharing, promotion or contract renewal, for reporting irregularities.

Conversely, any misuse of the system may expose the Whistleblower to disciplinary penalties as well as to legal proceedings.

As noted above, the use of the alert system is optional and DORIS will not impose any penalty or take any adverse action against a person who decides not to issue an Alert.

9.4.6 Procedure in the absence of due diligence on the part of the Alert Recipient

In the absence of due diligence on the part of the Alert Recipient to verify the admissibility of the Alert within a reasonable time, it may be addressed to the judicial authority, administrative authority or professional bodies.

In case any of the above-mentioned bodies fail to process the Alert within three months, the Alert may be made public.

In case of serious and imminent danger or in case of a risk of irreversible damage, the Alert may be brought directly to the attention of the judicial authority, administrative authority or professional bodies. It may be made public.

9.4.7 Terms of processing of the Alerts

The Alerts will be analysed with the utmost care and will result in investigations and actions deemed necessary, in compliance with applicable regulations.

The data collected in the context of the Alerts may be communicated to the persons in charge of the management of professional alerts within the group for the sole purpose of verifying or processing said Alerts.

Acknowledgment of receipt and processing time of the Alerts and

The Whistleblower will be promptly notified, by means of a written and dated acknowledgment of receipt, about the receipt of his Alert and a reasonable and foreseeable duration required to examine the admissibility thereof. The acknowledgment of receipt does not, however, constitute the admissibility of the Alert, and an Alert is inadmissible when it is manifestly outside the scope of the alert system.

The Whistleblower will also be informed about the terms according to which he will be notified of the outcome of his Alert.

Once the information sent has been verified, the Alert Recipient will inform the Whistleblower by email about the outcome of his Alert. If the reported facts are proven, the Alert Recipient will forward it to the management of DORIS, which will take appropriate action, including disciplinary measures.

Categories of data that can be considered as part of the processing of the Alert

As part of this whistleblowing system, DORIS will only collect personal data relating to:

- the identity, functions and contact details of the Whistleblowers;
- the identity, functions and contact details of the persons implicated;
- the identity, functions and contact details of the persons involved in the collection and processing of the Alerts;
- the reported facts;
- the information collected as part of the verification of the reported facts;
- the records of verification operations; and
- the outcome of the Alerts.

9.4.8 Data retention period

Any data relating to an Alert that will be considered as not falling within the scope of the whistleblowing system described above will either be promptly destroyed or archived after anonymization.

When the Alert is not followed by disciplinary or judicial proceedings, the data relating to this Alert are either destroyed or archived, after anonymization, within two months from the closure of the verification operations. The Whistleblower and the persons concerned by the Alert are informed about this closure.

When disciplinary proceedings or legal proceedings are brought against the implicated person or the Whistleblower misusing the system, the data relating to the Alert shall be retained until the end of the judicial proceedings.

As far as the archives are concerned, they will be retained in accordance with DORIS Group's general archives retention policy, for a duration not exceeding, in all cases, the duration of the litigation proceedings.

9.4.9 Transfer of personal data

In the context of the processing of Alerts, certain personal data relating to the Whistleblowers or the persons involved in the Alerts may be transferred outside the European Economic Area, namely to the countries of the Related Entities of the DORIS Group. DORIS undertakes to ensure an adequate level of protection for the data transferred in this context, particularly by signing Standard Contractual Clauses approved by the European Commission (which can be accessed by sending an email to dpo@doriseng.com) or by being a member of the Privacy Shield (including human resources data) for data recipients located in the United States.

9.4.10 Rights of individuals to their personal data

Anyone subject to an Alert will be informed about it as soon as his data is recorded, electronically or otherwise, to allow him to object to the processing of such data. When

precautionary measures are necessary, in particular to prevent the destruction of evidence relating to the Alert, the data subject will be informed only after these measures are adopted.

In accordance with the applicable laws on the protection of personal data, persons identified as part of the whistleblowing system have the right to access, rectify and delete personal data concerning them. They may also request the limitation of the processing of their data and define guidelines concerning the fate of their data in case of death. These rights are exercised with DORIS Group by a letter to Mrs Claire Litchman or by email to litchman.c@doriseng.com. The persons identified as part of the whistleblowing system may also contact the DORIS Data Protection Officer at dpo@doriseng.com. If the data subjects feel that, after having contacted DORIS, their rights to their data are not respected, they may submit a complaint to the competent data protection authority.