



SEAFRIGO GROUP

ALERT MANAGEMENT AT SEAFRIGO GROUP

MARCH 2026

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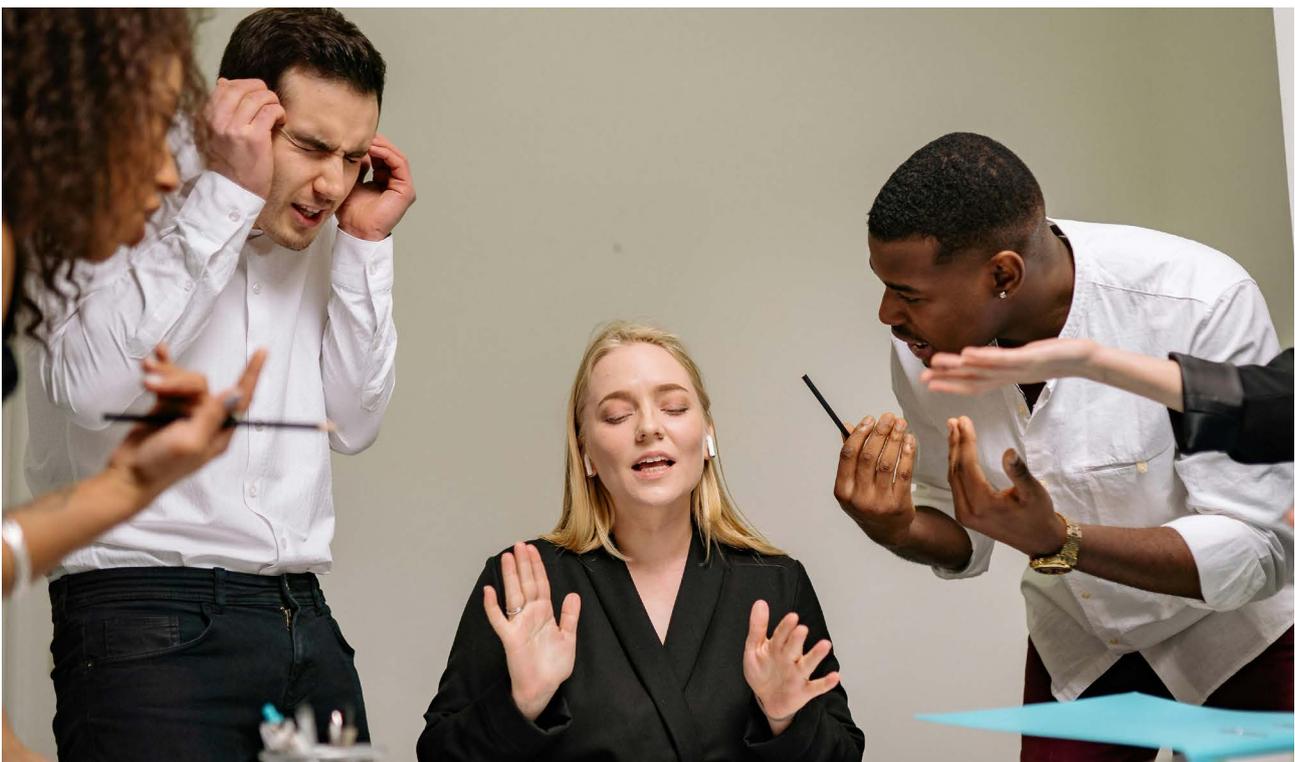
Purpose

The Seafriigo Group's internal whistleblowing system is based on the principles and obligations set out in the French extraterritorial Sapin II law, which establishes a system for protecting whistleblowers.

This protection has been further strengthened by the Wasserman law of March 21, 2022, and its implementing decree, which include the following main changes:

- The possibility for any internal or external stakeholder to report concerns to the company (e.g., job applicants, former employees, subcontractors, suppliers, customers, etc.);
- The possibility of reporting directly to the competent authority;
- Strengthened protection for whistleblowers, particularly against retaliatory measures, as well as new protection for those who assist them;
- The possibility of reporting facts that the person may not necessarily have personal knowledge of, if the information was obtained in a professional context.

This alert procedure incorporates these regulatory changes.



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Scope of application

This procedure applies to all Seafrigo Group employees, as well as to external stakeholders wishing to report a serious incident or behavior that violates the laws, regulations, Code of Conduct, or internal policies of the Seafrigo Group.

It is open in particular to:

- Seafrigo Group employees, regardless of their status;
- External or temporary employees;
- Former employees and job applicants;
- Members of the Seafrigo Group's governing bodies;
- Seafrigo Group co-contractors and their subcontractors;
- Internal or external stakeholders for breaches of the duty of care in connection with the activities of the Seafrigo Group and those of its subcontractors and suppliers.

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Definition of psychological harassment

Psychological harassment means any improper conduct that takes place over a period, is repetitive or systematic and involves physical behaviour, spoken or written language, gestures or other acts that are intentional and that may undermine the personality, dignity or physical or psychological integrity of any person.

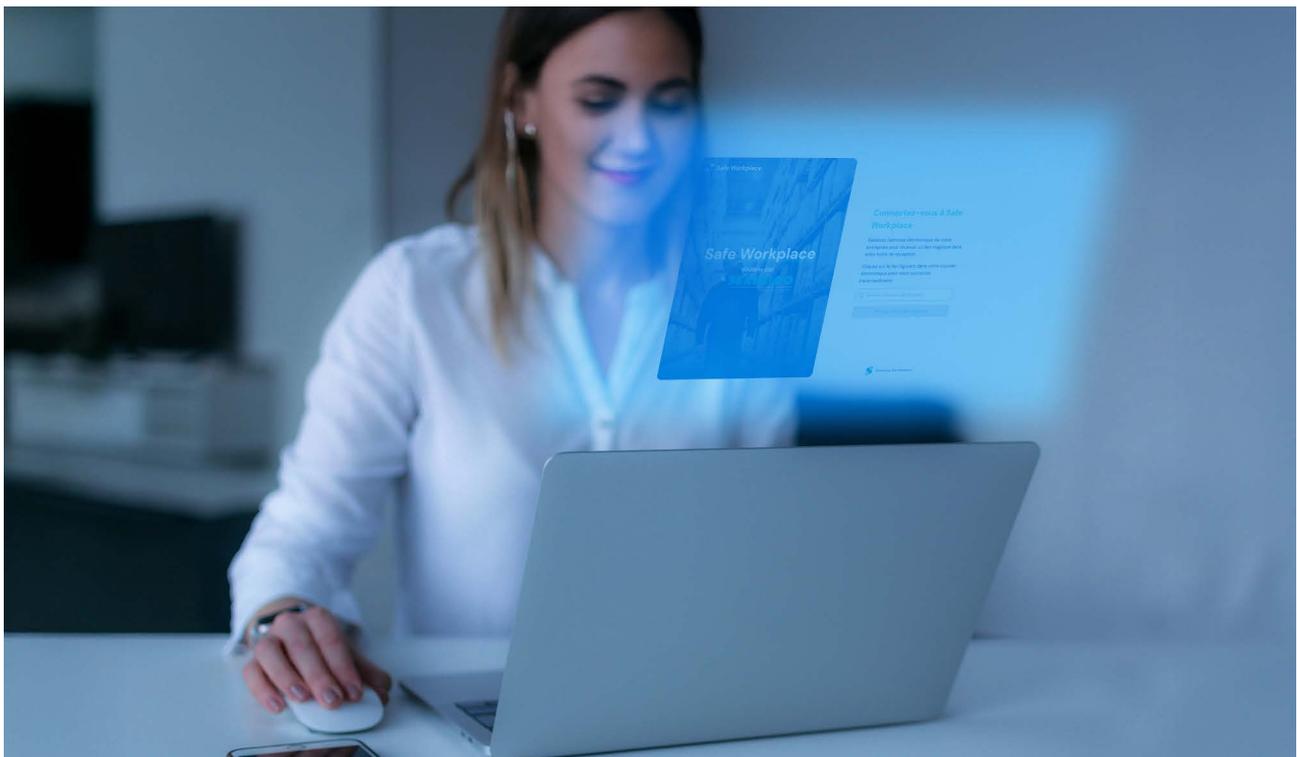
The perpetrator can be: an employer, a colleague of the victim, regardless of their position in the hierarchy...

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Definition of an alert

An alert is a report, made in good faith, **without malicious intent** and without direct financial compensation, concerning:

- A crime or offense,
- A threat or harm to the general interest of the Seafrigo Group,
- A violation or attempted concealment of a violation of national, European, or international laws and regulations,
- Breaches or situations contrary to the Seafrigo Group's Anti-Corruption Code of Conduct, whether involving corruption, fraud, discrimination, harassment, or conflicts of interest,
- Serious risks related to the Seafrigo Group's activities concerning human rights, fundamental freedoms, the health and safety of individuals, and the environment,
- Acts of corruption, fraud, discrimination, harassment, or conflicts of interest,
- Any breach of the Group's internal rules.



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Reception channels

Alerts can be transmitted via:

- The Seafrigo Group's secure alert platform, SAFEWORK PLACE
<https://seafrigo.safework.place/login> (accessible on line 24/7)



- In writing to the company's postal address, marked for the attention of the Ethics Officers, in a confidential envelope.

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Responsibilities

- Ethics officers: receive and assess alerts, oversee their handling, and report to General Management and the Works Council.
- Business line officers (HR, GDR, Legal, etc.): may be called upon for support as needed.



Processing procedure

The processing phase of reports begins with the receipt of the report as specified in Article 4. It ends with a decision on how to proceed with the report and with the notification of the author and the persons concerned by the facts.

7.1. Receipt and acknowledgment of receipt

- The alert may be received via several dedicated channels (see Article 5),
- The report may be made in writing or orally,
- The alert may be anonymous or not,
- Any alert received by the HR department will be handled by that same department unless the alert concerns a member of its team,
- A confirmation of receipt is sent to the author of the alert within seven business days, unless this is technically impossible or the alert is anonymous.

7.2. Admissibility analysis

Reports are subject to an admissibility analysis conducted by the Ethics Officers to determine whether they fall within the scope of the internal whistleblowing system and comply with the conditions set out by law.

This analysis, which may require some preliminary investigation, is carried out by the Ethics Officers.

During this phase, additional information or clarification may be requested via secure messaging.

In this case, the author of the report will receive a notification (by email or on the application) inviting them to log in to the platform. If they have not enabled notifications, they will need to log in to the platform regularly.

- The alert is analyzed within 15 days to assess its admissibility, based in particular on the criteria of relevance, seriousness, legal framework, and good faith,
- If the alert is inadmissible: the case will be closed with reasons given and a response will be sent to the author if possible,
- Any person implicated must be informed within 30 days of receipt of the alert,

- In all cases, the whistleblower will receive a response within three months of receipt of the alert by the Seafrigo Group.

The conclusions of the analysis of the report's admissibility are presented to the Ethics Committee for validation.

7.3. Internal investigation

The Ethics Committee rules on the admissibility of the report and decides on the action to be taken:

- If the report **is not admissible**, a message informs the author of the report that it has been closed and the reasons for this.
- If the report **is admissible**, the Ethics Officers appoint the persons responsible for conducting the investigation based on the area covered by the report. An investigation is opened: collection of evidence, hearings, analysis of the facts.

In the case of anonymous reports, the Ethics Officers shall take special precautions when handling such reports, particularly during the preliminary admissibility review, ensuring that the facts reported are sufficiently credible, serious, and detailed.

This step shall comply with the principles of confidentiality, presumption of innocence, and the rights of the persons involved.

Anonymous reports deemed admissible will be treated in the same way as others, provided that the author responds to requests for additional information during the investigation within a reasonable time frame.

If the report was made anonymously and the author did not provide an email address to receive notifications, they must log in to the SAFEWORKPLACE platform regularly to check their messages and respond to requests for additional information.

Failing this, and if their report does not contain sufficient detail to enable investigations to be carried out to establish the accuracy of the facts, it will be closed without further action.

If the alert is valid, depending on the results of the investigation, appropriate corrective measures are taken, such as disciplinary action, procedural changes, or organizational adjustments.

7.4. Closure of the investigation

- The alert gives rise to a documented decision (corrective measures, possible sanctions, closure without further action).
- The process is closed after the corrective measures have been implemented.

- The person who made the report is always told in writing when the report is closed and what decision was made after looking into it, no matter what the outcome is. A response is sent to them within a maximum of three months from the date of acknowledgment of receipt, within the limits of the information that can be disclosed.
- If an employee is implicated at the end of the investigation, the Human Resources Department informs them in accordance with the existing procedure.

Follow-up will be carried out to ensure the effectiveness of the actions taken.

Personal data is stored and then anonymized or deleted in accordance with the personal data protection policy detailed below.

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Confidentiality and protection

In general, the procedure implemented by the Seafriigo Group to collect reports guarantees strict and total confidentiality regarding the identity of the author, the persons targeted by the report, and the information collected by all recipients of the report.

Thus, information that could identify the whistleblower may only be disclosed with their consent.

Furthermore, information that could identify the person implicated in a report may only be disclosed once the validity of the alert has been established.

Any reprisals or intimidation against a whistleblower are prohibited and punishable by law.

Thus:

1. The content of reports made online on the SAFEWORKPLACE platform is encrypted from end to end.
2. All exchanges are conducted via secure messaging hosted on the SAFEWORKPLACE alert platform and remain confidential.
3. Only a limited number of individuals are authorized to collect and process reports, and they are subject to a specific confidentiality obligation.
4. Where applicable, experts appointed to conduct investigations are contractually bound to ensure the confidentiality of data related to the report and to delete it at the end of their assignment.

5. Information that could identify the whistleblower is never disclosed to the persons targeted by the report: alleged perpetrator(s) of the reported acts, victim(s) or witness(es).
6. When a report is made anonymously, the platform guarantees that all subsequent exchanges will also remain anonymous. No process will be implemented to enable the identification of the author of the report.
7. Any reprisal or intimidation against a whistleblower is prohibited and punishable by law.



Right of access

Any person who has reported an internal alert will have a right of access to find out what information has been collected and processed in connection with that alert, in accordance with the rules of the General Data Protection Regulation (GDPR).

This includes, for example, the possibility of requesting what data has been collected about them and checking its accuracy.

However, exercising this right does not allow access to information relating to third parties involved in the alert, such as the identity of the whistleblower, which is strictly protected.

Any person whose personal data is or has been processed in the context of an internal alert (whistleblower, alleged victims of the acts, persons targeted by the alert, witnesses and persons interviewed during the investigation, etc.) has the right to access it in accordance with the provisions of Article 15 of the General Data Protection Regulation (GDPR).

The exercise of this right must not infringe on the rights and freedoms of others, including business secrecy or intellectual property. However, this limitation may not result in the data subject being denied access to all the information referred to in Article 15.1 of the GDPR (for further details, see the EDPS Guidelines No. 01/2022 on the right of access).

This limitation is specific to the rules on the protection of personal data and does not prevent the application, where applicable, of the rules of procedural law and fundamental freedoms (in particular the adversarial principle).

All individuals also have the right to rectify, erase, and restrict their data.

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Archiving

All documents in the file are kept in a secure location for a period not exceeding five years, unless otherwise required by law. Beyond these retention periods, the data is anonymized or deleted. A register of alerts is kept up to date (anonymized) by the Ethics Officers.

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Monitoring and reporting

- The Ethics Officers prepare an annual report on the monitoring of alerts for senior management and, where applicable, the Ethics Committee.
- This report may be used to inform compliance reviews and preventive measures.

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Documentary references

- Law No. 2016-1691 known as Sapin II
- Article L1152-1 of the Labor Code
- Directive (EU) 2019/1937 on the protection of whistleblowers
- Seafrigo Group Code of Conduct
- Seafrigo Group Compliance Policy

For more information

Contact us at compliance@seafrigo.com with any questions or project submissions.

Login to **SAFE WORKPLACE**
by scanning the QR Code below:



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