

# ALERT PROCEDURE USER GUIDE

## 1 WHAT IS THE ALERT PROCEDURE?

Our Code of **Conduct**<sup>1</sup> establishes an alert procedure which enables **Safran T4D** employees to (a) responsibly report any illegal or behavior by other employees or third parties (such as sales rep, customers, suppliers, etc.), and (b) play an active role in ethics violations and prevention.

The alert procedure guides **Safran T4D** employees if they have reason to suspect a violation of the Code of **Conduct** or **Safran T4D**'s rules and policies.

## 2 SCOPE: WHAT FALLS UNDER THE ETHICS ALERT PROCEDURE

The alert procedure applies when an employee reasonably believes one of the following has happened, is happening, or is likely to happen:

- *A criminal offense, including fraud*
- *Disregard for the law, or any legislation*
- *Malpractice or ill treatment of an employee, customer or supplier*
- *Any disregard of **Safran** Code of **Conduct** or rules and policies, including conflict of interest, bribery, disclosure of confidential information, etc)*
- *Safety violation or safety hazard identified*
- *Any other serious irregularity*
- *Deliberate concealment of any of the above*

The alert procedure is to be used in compliance with **Safran T4D**'s policies, applicable laws and rules in the country in which the employee lives or works.

It should not be used to raise malicious or unfounded allegations: only those who use this policy in good faith will be protected under it.

<sup>1</sup><https://safran-navigation-timing.com/document/alert-procedure-en/>

## 3 HOW TO RAISE AN ALERT

Any concerns should be reported first to line management. However, if the employee believes that informing his/her line manager could present difficulties, or that such concerns may not be followed up appropriately, the following persons or committees can be contacted directly (in the order shown):

- *Safran T4D Compliance Officer*
- *The local HR representative*
- *Safran T4D VP of HR*
- *Safran T4D CEO*

Concerns may also be reported to [safran@alertethic.com](mailto:safran@alertethic.com).

### ALERTS ARE NOT ANONYMOUS

However, the identity of the employee having raised the alert may be kept confidential to the Compliance team and, if applicable, to the person listed above who first received the alert.

## 4 WHAT HAPPENS AFTER AN ALERT

### IS RAISED

The Compliance department receives each ethics alert, and examines it personally. The Compliance department is responsible for following up on the alert per the Alert Procedure, including any needed investigation. If the Compliance department deems it necessary, an interview will be arranged with the employee who raised the alert. Confidentiality is maintained to the greatest possible degree, but is not guaranteed. Alerts may be communicated to members of the **Safran** team who have knowledge relevant to the subject. All alerts are examined in accordance with the rules applicable to the handling of personal data.

## 5 CONSEQUENCES OF THE ALERT

Disciplinary action will not be taken without an investigation. The employee who raised the alert may request to be informed of the outcome of the investigation. If the investigation determines that unethical conduct has occurred, that determination is forwarded to the Compliance department and to **Safran T4D**'s VP of HR who will initiate disciplinary action as and if relevant. **Safran T4D** may be required by law to report certain illegal activities to the proper enforcement agencies.

## 6 NO RETALIATION

Any retaliation in any way against an employee for raising or participating in the investigation of any alert is absolutely prohibited. **Safran T4D** shall not discharge, demote, suspend, threaten, harass or in any manner discriminate against an employee with respect to a good faith alert or participation in a related investigation. Any employee who engages in retaliation is subject to disciplinary action up to and including termination. Should an employee believe that he/she is the subject of such retaliation, the employee should report the retaliation to the **ST4D Compliance Officer**, the local HR representative, **Safran T4D** VP of HR, or **Safran T4D** CEO.

## 7 VIOLATIONS

Any employee who violates the Alert Procedure may be subject to disciplinary action up to and including termination.

COMPLIANCE OFFICER  
**ISABELLE MELODY**

[isabelle.melody@nav-timing.safrangroup.com](mailto:isabelle.melody@nav-timing.safrangroup.com)  
tel: (1) 585.321.5816 mobile: (1) 585.404.8242

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