VIRBAC SIGNAL: Whistleblowing report

Virbac Groupe - 2023.345

FAQ

How to report an incident or make a professional alert internally? Externally?

Internal employees of Virbac can make a report directly to one of the Group Alert Referents to receive and analyze alerts, or to a local Alert Referent if the organization has expressly designated one, or directly via our Virbac Signal platform accessible online. following address:

https://virbac.besignal.com

This method of collecting and reporting alerts is a complementary means, which is not intended to replace traditional internal communication channels specific to each country, such as hierarchical channels or employee representation bodies (work council).

Collaborators external to Virbac and all other stakeholders can make a report via our Virbac Signal reporting platform accessible via our Corporate website and at the following address https://virbac.besignal.com.

Any alert received will be recorded by nature, traced and will be the subject of central reporting to the Group legal compliance department.

Who can use the alert system https://virbac.besignal.com?

Anyone with whom Virbac interacts in the course of its business activities can use the Virbac Signal digital alert reporting system. These people may be our employees, occasional or external collaborators, managers, directors, shareholders, customers, suppliers, subcontractors, distributors, and agents for example.

The user of the Virbac Signal digital alert system is a natural person who must issue their report in good faith, not have received financial compensation for issuing the alert, have obtained the information within the framework of their professional activities or, if this is not the case, having personal knowledge of the reported facts and must not deliberately make false reports. Any person deliberately making false or misleading statements is liable and may be subject to legal action.

What kind of protection for the whistleblower?

Virbac is committed to creating a space where anyone can express themselves freely, without fear of reprisals. It is only on this condition that our culture of integrity and respect for human rights can grow.

Therefore, regardless of the means used to make a report, any stakeholder having issued a report in good faith, without intent to cause harm, in compliance with the alert procedure published on the Virbac Signal alert portal and this, even if the facts reported prove to be inaccurate, will be protected. Direct or indirect retaliation by an employee of the entity or by the entity itself towards such a person will not be tolerated and may give rise to disciplinary action or prosecution.

What type of reports can be issued via the alert system?

<u>Virbac Signal</u> may be used to report any suspected or potential violation of law, regulation, or the Virbac Code of Conduct. Virbac offers several ways to report issues, including options like our portal <u>Virbac Signal</u>, only allowing anonymity when legislation allows it.

The alert cannot, however, relate to elements covered by defense secrecy, the secrecy of relations between a lawyer and client or medical secrecy.

Furthermore, the alert system should not be used to signal imminent threats to life and/or property. This is not an emergency hotline or a substitute for contacting law enforcement.

What are the conditions for the admissibility of the alert?

Regardless of the channel chosen, the violation reported must be serious and the alert issued in good faith.



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The alert message must describe objectively and as precisely as possible the facts of which the whistleblower was personally a witness or victim, indicating in particular the dates, the entity concerned, and the names of the people concerned. The whistleblower of the alert provides information or documents likely to support the alert.

How to use the alert system?

For a new report:

- open the Virbac alert portal: Virbac Signal
- carefully read the information published on the platform as well as the alert procedure which describes how your alert will be processed
- click on "make a new report"
- complete the questions asked to you
- before "submit" your report
- a confidential and personal code will be sent to you to allow you to follow up on the report you have made and/or to communicate directly with the Alert Referent responsible for processing the report.

To monitor the status of an existing report that you initiated or provide additional information or documents to your report:

- open the Virbac alert portal: <u>Virbac Signal</u>
- click on "access an existing report"
- indicate the "*tracking code*" personal and confidential which was communicated to you after you submitted your report the first time and which you must keep confidential and secure.

Anonymity Virbac Signal

Reports may be made anonymously where permitted by law. But we encourage the author of a report to reveal their identity because it is difficult, and sometimes impossible, for us to investigate a report made anonymously by post mail for example, especially when the report is not precise and does not have any documentation supporting the alleged facts. Without additional information allowing the report sent by mail to be declared admissible to allow it to be processed according to the procedure to which you have access on the portal's home page, the report will be closed and deleted within the legal deadlines.

However, making an anonymous alert is possible and offered when you only use the Virbac Signal system, which allows you to exchange information with the Alert Referent, answer questions, and download documentation to support your alert. To do this, you must keep safe and secure the confidential and personal code sent to you by the Virbac Signal system. That's important. If you lose your code, you will be unable to communicate with us since you will no longer be able to access your alert. The only way will then be to send the same alert again to obtain a new personal code you must keep carefully.

Confidentiality

All reports are treated confidentially. This means that information regarding the report is only shared with a limited number of people and only to those who need to be informed (i.e. to the investigation team so that investigations can be carried out, sometimes external parties such as law firms, and to members of the Ethics Committee as mentioned in the alert procedure).

The identity of the author of the report will not be revealed to the persons identified in the report without the prior consent of the author of the report, unless this is required by a law or regulation in force. Confidentiality does not apply to reports made in bad faith.

For any further information, do not hesitate to refer to our procedure for processing alerts accessible on our alert portal <u>Virbac Signal</u> or to contact the <u>legal compliance department</u>.

