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| Group Ethics Alert System | | |

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1. PRESENTATION OF THE ALERT SYSTEM

The Legrand Group (the "Legrand Group") promotes compliance with applicable laws and regulations, in particular through its Guide to Good Business Practices and its Charter of Fundamental Principles. The purpose of the whistleblowing system is to support the Legrand Group's Compliance and Ethics policy by enabling everyone to play a part in risk prevention.

In this context, the Legrand Group has set up a specific reporting system called "Signal'Ethic".

The **Signal'Ethic** platform is accessible at the following address: legrand.signalement.net.

This address is indicated in particular:

- on the Group intranet dedicated to Compliance: Dialeq Compliance ;
- in the Guide to Best Business Practices ;
- on the legrandgroup.com website;

- in Legrand's universal registration document.

The alerts filed on the Signal'Ethic platform are accessible by a limited number of people, depending on the subject of the alert:

- the Director of Human Resources and the Internal Controller of Human Resources for matters concerning respect for human rights in the workplace, including health, hygiene and safety at work and discrimination and harassment at work.
- the Head of Internal Audit for fraud alerts.
- the Group Compliance Officer for all other types of reports.

These first recipients of the report are the Signal Ethic **referents** (the "Referent(s)").

To ensure that these alerts are handled objectively and effectively, the Compliance Officer may also call on the assistance of the **ethics committee**. Depending on the circumstances, this committee is made up of one or more members of management and, where internal control or financial impact is at stake, of the Director of Group Management Control and Internal Audit; hereinafter the "Ethics Committee".

Signal'Ethic is accessible to employees and all stakeholders (customers, suppliers, consultants, etc.) of the Group.

2. EXERCISING THE RIGHT TO ALERT

The **use of** Signal'Ethic is **optional**. The use of the platform is only a complementary tool offered to the Group's employees and stakeholders and is **not intended to replace other existing channels**.

Employees and stakeholders can also contact :

- Management, which can guide and advise employees (except when it is itself the target of the alert, in which case the whistleblower can choose one of the alternatives presented in this procedure);
- Human Resources Department;
- Compliance officers;
- Group Internal Audit ;
- Group Management Control.

3. AREAS OF INTEREST

The facts reported must relate to the following cases:

- **a felony or misdemeanor;**
- **a violation or attempted concealment of a violation of law, international law or European Union law;**
- **a threat or harm to the public interest;** or
- **the existence of conduct or situations contrary to the Charter of Fundamentals and the Guide to Best Business Practices.**

Alerts may include the following areas:

Compliance in business relationships with our stakeholders:

- Compliance with competition rules ;
- Fight against corruption and influence peddling ;
- Compliance with embargoes, international sanctions and prevention of money laundering;

- Fight against fraud.

Respect for Human Rights at Work:

- Fight against child labor;
- Fight against forced labor ;
- Guarantee of freedom of association and trade union freedoms ;
- Respect for decent working conditions;
- Fight against discrimination and harassment in the workplace ;
- Guarantee of health, hygiene and safety at work.

Serious environmental damage

This may include the discharge or pollution of soil, air and water, illegal dumping of waste, etc...

Failure to comply with laws, regulations or the public interest

On the other hand, alerts may not concern **elements covered by national defense secrecy, medical secrecy, the secrecy of judicial deliberations, the secrecy of judicial investigations or the secrecy of relations between a lawyer and his client.**

4. AUTHOR OF THE REPORT AND CONFIDENTIALITY

Reporters are encouraged to identify themselves in order to facilitate the processing of the alert.

A report from a person who wishes to remain anonymous may be processed, by way of exception, provided that such a report contains sufficiently serious and detailed facts to enable the Legrand Group to carry out the necessary checks for its processing.

The author of the report is assured of the confidentiality of his report:

- His/her identity and personal data will be kept strictly confidential, especially with regard to the person involved in the alert;
- The Referent may only bring the contents of an alert to the attention of persons outside the Ethics Committee if their involvement is strictly necessary for the handling of the alert in question. In this case, these persons are also required to respect the strict confidentiality of the information they receive in connection with the processing of the alert, by [signing a specific confidentiality agreement](#).

With the exception of the judicial authority, the elements likely to identify the author of the alert may only be disclosed with the consent of that person.

5. WHISTLEBLOWER PROTECTION

The legal regime for whistleblowers applies as soon as the author of the report meets the following conditions:

- be in good faith;
- act without direct financial consideration;
- have personal knowledge of the facts when the information was not obtained in the course of professional activities.

Thus, it benefits from a broad protection:

- **criminal immunity** in the event of a breach of a secret protected by law, provided that the alert issued meets the criteria defined in the Sapin II Act of December 9, 2016, on transparency, the fight against corruption and the modernization of economic life, that the disclosure is necessary and proportionate to the safeguarding of the interests in question and that it takes place in compliance with the reporting procedures provided for ;
- **the confidentiality of the data concerning him/her** and in particular of his/her identity, except in the event of injunction of the authorities within the framework of lawsuits ;
- **the prohibition of any dismissal, sanction, discrimination** and, more generally, of any reprisal for having reported facts in compliance with the procedure for reporting alerts. In this case, the burden of proof is reduced. The employee only needs to provide evidence that suggests the existence of retaliation following his or her alert, and the employer must demonstrate that the disputed measure was taken for a reason unrelated to the alert.

In accordance with legal provisions, and as specified in the Charter of Fundamental Principles and the Guide to Best Business Practices, the Legrand Group provides protection against retaliation for whistleblowing. Thus, no one will be subject to any action or threat of retaliation for having made a report in good faith. Any person who believes that he or she has been subject to retaliation, or has been threatened or harassed, should report it immediately, either to his or her direct supervisor, the Group Human Resources Department or the Group Compliance Officer.

This protection of the whistleblower is extended to persons related to him/her:

- Facilitators, understood as any natural person or any legal entity under private law with a non-profit purpose (association, trade union, etc.) who helps a whistleblower to make a report or disclosure
- Individuals who are related to a whistleblower and who are at risk of retaliation in the course of their professional activities by their employer, their client or the recipient of their services;
- Legal entities controlled, within the meaning of the French Commercial Code, by a whistleblower for whom he or she works or with whom he or she is in contact in a professional context.

The author of the alert may also, in accordance with the French Sapin II law, send his or her alert to the Human Rights Defender, in order to be directed to the appropriate body for the collection of the alert.

Finally, any person who obstructs, in any way whatsoever, the transmission of an alert may be punished by one year's imprisonment and a €15,000 fine.

In proceedings against a whistleblower for information reported or disclosed, the amount of the civil fine that can be imposed for abusive or dilatory action is increased to 60,000 euros.

Any person who knowingly makes false statements, discloses misleading information, or acts in bad faith or in an abusive manner may be subject to disciplinary action or prosecution in accordance with applicable laws and regulations.

On the other hand, **the use of the system in good faith**, even if the facts are subsequently proven to be inaccurate or do not give rise to any follow-up, **cannot lead to any disciplinary sanction against the author of the alert.**

6. INFORMATION TO THE PERSON CONCERNED BY THE ALERT

This person will be informed that he or she is the subject of an alert by the persons in charge of processing the alert as soon as the data concerning him or her is recorded, except in special circumstances and with the agreement of the Ethics Committee or the Reporting Officer, in particular when protective measures are necessary, for example to prevent the destruction of evidence relating to the alert. In this case, the information to this person may be deferred.

The person implicated by the alert will also be informed of the facts of which he or she is accused, of the services that may be the recipients of the alert, and of the procedures for exercising his or her rights of access and rectification of personal data. It is important to specify that a person implicated by an alert is presumed not to have committed the said breach, throughout the procedure and until proven otherwise.

7. RECEIVING THE ALERT

As soon as the alert is received, the author of the alert **is informed in writing and without delay of the receipt of the alert**, as well as of the reasonable and foreseeable period of time required to examine its admissibility and of the procedures for informing the author of the alert of the action taken.

Acknowledgment of receipt does not constitute admissibility of the report.

8. TREATMENT OF THE ALERT

Each alert will give rise to a **preliminary assessment** treated confidentially by the Referent in order to determine, prior to any investigation, whether it falls within the scope of the alert procedure. Any alert that is clearly outside the scope of the procedure, that is not serious, that is made in bad faith or that constitutes an abusive or slanderous denunciation, as well as any alert concerning unverifiable facts, will be destroyed without delay; the author will then be informed.

In the event that the alert is admissible, the author will be informed.

The Referent will take all necessary measures to deal with the alert, in particular by initiating an investigation if necessary, in order to determine the reality and the materiality of the facts reported.

The investigation is entrusted to any person designated by the Referent or any person designated by the Group Compliance Officer and may be followed, when circumstances require, by the Ethics Committee, whose composition may change according to the subject and the geography concerned. The Compliance Officer may, if necessary, benefit from the support of specialized service providers subject to the same rules of confidentiality.

The author of the alert may be involved in the investigation process to verify the facts he or she has reported and to provide new information or documents.

The course of the investigation, its content and the resulting report are strictly confidential, including with regard to the author of the alert.

9. CLOSURE OF PROCESSING OPERATIONS

A confidential report may be made to the **Ethics Committee** if the situation so requires.

If corrective measures are necessary, the Ethics Committee or the Referent may approach the local management line concerned to propose an action plan. The measures must be notified to the Group Compliance Officer.

Disciplinary measures or legal action may be taken in accordance with the applicable legal provisions.

Finally, the author of the alert and the persons concerned by it will be informed of the closure of the investigation.

10. STATISTICAL FOLLOW-UP OF ALERTS

Statistical monitoring of Legrand Group alerts will be carried out by the Group Compliance Committee in order to help improve the accessibility and effectiveness of the alert system.

11. PERSONAL DATA

11.1 Processing of personal data

Personal data relating to an alert is processed, on the basis of the legal obligation, in accordance with the requirements of the Sapin II law and the Duty of Vigilance law of March 27, 2017 relating to the duty of vigilance of parent companies and ordering companies.

The content of messages and attachments sent by the sender of the alert may contain personal data.

The following categories of data will be processed in accordance with the personal data legislation in force:

- identity, duties and contact information of the alert issuer ;
- identity, functions and contact information of persons subject to an alert ;
- identity, functions and contact information of the persons involved in the collection or processing of the alert ;
- facts reported ;
- elements collected as part of the verification of the reported facts ;
- report of the audit operations ;
- follow-up to the alert.

This data is stored on the computer platform of the service provider signalement.net, hosted on the servers of the company OVH in France. The data controller is Legrand France.

11.2 *Duration of personal data retention*

The retention period in the active database of these data depends on their treatment:

- The data related to an alert considered as inadmissible upon receipt will be immediately deleted.
- When an alert is considered admissible, the data related to this alert will be kept in the active database:
 - a maximum of two months from the end of the processing of the alert, if no action is taken on the alert;
 - until the end of the procedure or the limitation period for appeals against the decision, if disciplinary proceedings or legal proceedings are initiated against the respondent or the author of an abusive alert.

After deletion from the active database, personal data will be archived in an intermediate archive for a period of six years, unless otherwise required by the legislation of another country. Archiving operations are managed by the Group Compliance Officer.

11.3 *Right of access and modification*

Any person identified on the Signal'Ethic platform has a right of access, rectification, opposition, deletion and limitation of the data concerning him/her, in particular when these data are inaccurate or obsolete, in accordance with the applicable regulation in France as regards protection of personal data.

The person who is the subject of an alert may not, under any circumstances, obtain information concerning the identity of the author of the alert on the basis of his/her right of access.

The request must be sent by mail to the data controller: Legrand, Group Compliance Officer, 5 rue Jean Nicot - 93500 Pantin, or via the internal messaging system of the reporting platform accessible at legrand.signalement.net.

This data may, if necessary, be made available to other Group entities and/or service providers acting as subcontractors, subject to a confidentiality undertaking.

In the event that data is transferred to a country outside the European Union, this transfer will be carried out in accordance with the applicable provisions relating to international transfers of personal data. At the request of the author of the alert, the terms of this possible transfer and the guarantees governing it may be communicated to him/her.

12.COMMUNICATION OF THE PROCEDURE

The procedure is available on the Legrand Group [intranet](#) for all employees.

It is also available on [the legrandgroup.com website](http://the.legrandgroup.com) in the "Business Ethics" section.

APPENDIX - CONFIDENTIALITY COMMITMENT

I, the undersigned Mr/Mrs _____, performing the duties of _____ within the company _____ (hereinafter referred to as the "Company"), being in this capacity required to access confidential and personal data necessary for the processing of ethics alerts and accessible on the digital platform legrand.signalement.net (referred to hereinafter as the "Platform"), hereby declare that I acknowledge and guarantee the confidentiality of said data.

I therefore undertake, in accordance with Article 4 of the amended French Act of 6 January 1978 on Data Processing, Data Files and Individual Liberties and Articles 32 to 35 of the General Data Protection Regulation of 27 April 2016, to take all precautions in accordance with customary practice and the state of the art within the scope of my duties in order to protect the confidentiality of the data to which I have access and, in particular, to prevent them from being communicated to persons not expressly authorized to receive them.

In particular, I agree to:

- not to use the data to which I have access for purposes other than those for which I am responsible;
- to disclose such data only to persons duly authorized, by virtue of their functions, to receive such data, whether they are private, public, natural or legal persons;
- not remove any of this data from the Platform, except when ordered to do so by the competent authorities;
- not to make any copies of this data except as necessary for the performance of my duties;
- to take all measures in accordance with the practices and the state of the art within the framework of my attributions in order to avoid the diverted or fraudulent use of these data;
- take all precautions in accordance with the practices and the state of the art to preserve the physical and logical security of these data;
- ensure, within the limits of my authority, that only secure means of communication are used to transfer such data;
- in the event of termination of my duties, to return in full the data, computer files and any information support relating to these data.

This confidentiality undertaking, which is in force throughout the duration of my duties, will remain in effect after I cease to hold office, regardless of the cause, insofar as this undertaking concerns the use and communication of confidential data, whether or not of a personal nature.

I have been informed that any violation of the present commitment exposes me to disciplinary and penal sanctions in accordance with the regulations in force, particularly with regard to articles 226-16 to 226-24 of the penal code.

Done at _____, on dd/mm/yyyy, in two (2) copies

Name:

Signature: