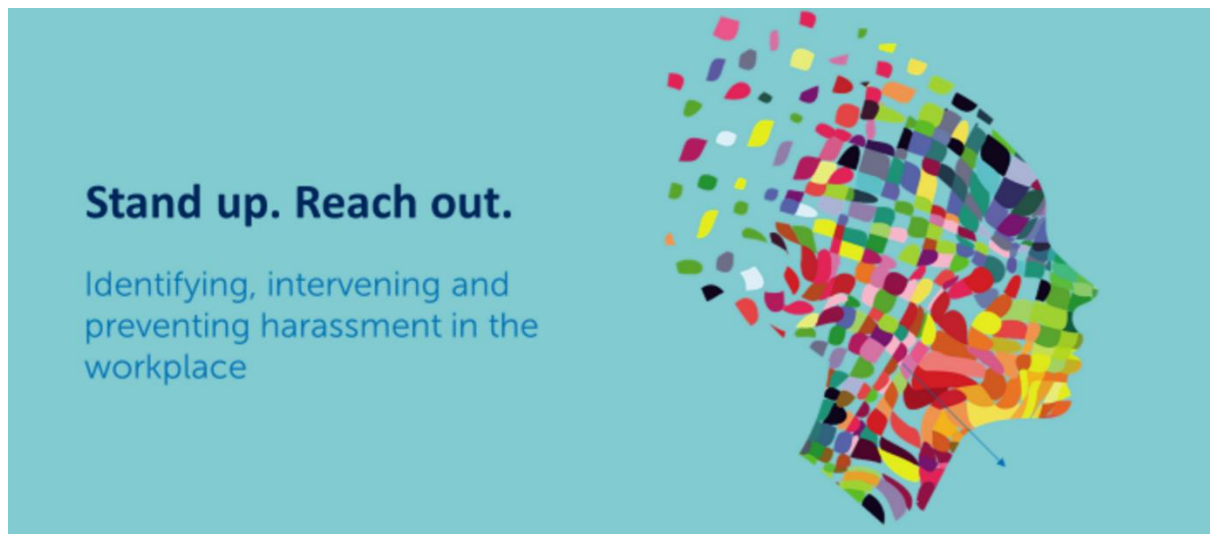


Policy for the Prevention of Harassment



Contents

I. OUR COMPANY'S POLICY	2
II. INDIVIDUALS COVERED BY THIS POLICY	2
III. DEFINITION OF HARASSMENT	2
IV. DISSEMINATING THE POLICY	3
V. COMPLAINT PROCEDURE.....	3
A. Notify the appropriate staff.....	3
B. Describe the Misconduct	4
C. Your Timeframe for reporting a complaint.....	4
VI. RESOLVING THE COMPLAINT	4
Sanctions	4
Which information should be included in the complain?.....	5
VII. FORMAL LEGAL PROCEEDINGS	5
VIII. CONCLUSION.....	5

I. OUR COMPANY'S POLICY

ESI GROUP hereby commits itself to the ideal of a collegial work environment in which all individuals are treated with respect, courtesy and dignity. You have the right to work in a professional atmosphere that promotes equal opportunity and prohibit discriminatory practices, including harassment. At ESI Group, any form of harassment, whether verbal, physical, or nonverbal, is unacceptable and will not be tolerated.

II. INDIVIDUALS COVERED BY THIS POLICY

This policy covers all workers which include: employees, interns and independent contractors and consultants who provide services to the Company. ESI GROUP will not tolerate, condone, or allow harassment by or of any worker. To the extent that we can influence or control such behavior, neither will we tolerate, condone, or allow harassment by outside customers or other non-employees who conduct business with ESI GROUP. We encourage you to report all incidents of harassment, regardless of who the offender may be, or of the offender's relationship to the company.

III. DEFINITION OF HARASSMENT

All workers are prohibited from any unwelcome conduct that might reasonably be expected or be perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Harassment includes all inappropriate behaviour linked to the race, the sex, the religion, the national origin, age and disability:

- **Race:** Race-based harassment includes telling racial jokes, using inappropriate epithets, or posting racially offensive pictures or images. Race includes personal characteristics.
- **Sex:** Sexual harassment includes jokes, hazing, or other harassing actions that are based on sex, sexual orientation, gender stereotypes, pregnancy, gender identity, or that are sexual in nature. All individuals can be victims of sexual harassment, including transgender individuals.
- **Religion:** Religious harassment includes jokes, derogatory comments, or offensive pictures that are based on an employee's belief system or lack of one.
- **National origin:** National origin harassment occurs when an employee is subjected to harassing behavior because they are from a particular country or part of the world, because of their ethnic ancestry or traits linked to ethnicity, such as accent or

cultural identity, or because they appear to be of a certain ethnic background (even if they are not).

- **Age:** Age harassment occurs when an individual 40 years or older is subjected to offensive comments, jokes, or stereotypes on the basis of their age.
- **Disability:** Disability harassment occurs when a disabled person is put in a less favorable setting more frequently than other people doing the same job or when they are subjected to name-calling or teasing because of his or her disability.

IV. DISSEMINATING THE POLICY

ESI GROUP will announce and distribute this policy to all workers and publish it via the Metacompliance. We will hold all managers responsible for knowing the substance of the policy, and for implementing it. HR Team, VP HR and the VP General Secretary & Governance will be available to answer all questions about the policy and its implementation.

V. COMPLAINT PROCEDURE

While ESI GROUP encourages individuals who believe they are being harassed to firmly and promptly notify the offender that his or her behavior is unwelcome, we also recognize that power and status disparities between an alleged harasser and someone targeted for harassment, or other circumstances may make such a confrontation inadvisable, impracticable, or even dangerous. In the event that such informal direct communication between individuals is ill-advised or proves ineffective, you should take the following steps:

A. Notify the appropriate staff

- If you believe you have been harassed, or are witnessed of any such conduct, report the incident to any HR member. In India, you can also contact member of the Posh committee or via email POSH-India@esi-group.com
- You also may report harassment to your manager. A manager who resolves the complaint informally and to your satisfaction must file a confidential report with HR team member. The report should detail the complaint and its resolution, so that ESI GROUP will be aware of any pattern of harassment by a particular individual and also will be aware of all complaints of harassment within the organization. A manager who does not successfully resolve the complaint informally must file a written report with one of the HR team member.
- If the person to whom you would normally report harassment, or who is charged with investigating harassment is the harasser, report the harassment to the Ethics Committee members (ethics@esi-group.com). We regard this as an especially serious abuse of power, and will create an alternative investigatory panel to deal with it appropriately.

Ethics Committee will take decisions link to Harassment at ESI

The role of this committee is:

- To follow the application of the harassment policy: update of the policy, follow up of the trainings, guarantee an easy access to the information by employees
- Analyze harassment notification and decide of convenient action plans linked

B. Describe the Misconduct

ESI GROUP needs an accurate record of objectionable behavior in order to resolve a formal complaint of harassment. Verbal reports of harassment must be reduced to writing by either the complainant or the person(s) designated to receive complaints, and must be signed by the complainant.

C. Your Timeframe for reporting a complaint

ESI GROUP encourages you to report complaints promptly so that we may respond rapidly and take appropriate action. This policy not only aids the complainant, but also helps us maintain an environment free from harassment and discrimination for all employees. You should also be aware of the time limits imposed by local, state, and national government agencies for filing complaints of harassment or discrimination.

VI. RESOLVING THE COMPLAINT

- ESI GROUP will complete the investigation of a harassment complaint and will communicate its findings and intended actions to the complainant and alleged harasser as expeditiously as possible.
- If the investigator finds that harassment occurred, the harasser will be subject to appropriate instructive and/or disciplinary procedures. The complainant will be informed of the action taken, and the finding and action taken will be made part of the record of the investigation.
- If the investigator cannot determine whether or not harassment has occurred, this finding will be communicated to the complainant and the alleged harasser and made part of the record of the investigation. Both the complainant and the alleged harasser will be informed again of the procedures set forth in this harassment policy, including the appeal process below.

Sanctions

- ESI GROUP will sanction individuals found to have engaged in misconduct constituting harassment commensurate with the severity of the harassment. The Ethics Committee will determine the appropriate sanction, but our response at a minimum will include reprimanding the offender and preparing a written record. Additional action may include additional education or training, referral to mediation or counseling, withholding of a promotion, reassignment, temporary suspension without pay, financial penalties, or termination.

- This policy is designed to protect all employees from harassment, in any way associated with the workplace or work environment, no matter who is the harasser.
- Our ability to discipline a nonemployee harasser (e.g., customer, service provider, etc.) may be limited by the degree of control, if any, that we have over the alleged harasser, and our legal obligations. However, any employee who has been subjected to sexual harassment should file a complaint and be assured that action will be taken. Such action may include instruction or mediation, if appropriate, closing business with a customer, reporting a customer contact to her or his employer, reporting a public official to an appropriate agency, or any other appropriate action.
- Any sanction we may impose internally is independent of sanctions which other appropriate bodies may impose.

Which information should be included in the complain?

The more information the report contains, the more it will help to analyze the situation and to adjust on a better way the actions needed.

- When does the fact begin to appear?
- Who is the harasser?
- Who is aware of the situation?
- Description of the facts
- Are these facts still on going?
- How often did it happen?

VII. FORMAL LEGAL PROCEEDINGS

The procedures above apply to internal complaints of harassment. Different procedures apply after a formal governmental administrative charge or civil lawsuit is filed. If you receive such a charge or complaint, deliver it to one member of the HR Team. ESI GROUP strictly prohibits retaliation against any person who files either an informal/internal complaint or a formal charge or complaint of harassment. Such retaliation exposes you to disciplinary action, up to and including dismissal.

VIII. CONCLUSION

ESI GROUP has developed this policy to ensure that all its employees and partners can work in an environment free from harassment. We will make every effort to ensure that all personnel know the policy, and that we will investigate thoroughly, and resolve appropriately, any complaint we receive. We welcome your questions, comments, and suggestions about how to improve this policy.

At Bagneux, April 8th, 2024

Corinne Romefort Regnier
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