



wolf lingerie

# Internal Whistleblowing System Procedure for Collecting and Handling Reports

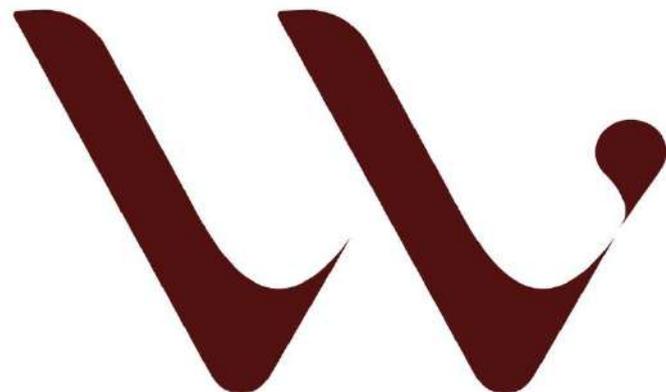
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## Informations

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## Objectives

As an extension of its ethical charter, vigilance policy, and in compliance with regulations (Sapin II Law, Wasserman Law and its implementing decree), Wolf Lingerie adopts this internal whistleblowing system detailed in this procedure for collecting and handling reports.

This system allows any Wolf Lingerie employee or partner to report in good faith any facts that may be contrary to legal obligations and/or Wolf Lingerie's ethical charter, under the conditions defined below. It also aims to guarantee whistleblower protection and ensure confidential, impartial, and prompt handling of alerts.

## Who Can Report?

This system is open to:

- a. employees, persons whose employment relationship has ended when the information was obtained during that relationship, and job applicants when the information was obtained during the application process;
- b. shareholders, partners, and holders of voting rights at the company's general meeting;
- c. members of the administrative, management, or supervisory body;
- d. external and occasional collaborators;
- e. the company's contractors, their subcontractors, or, in the case of legal entities, members of the administrative, management, or supervisory body of these contractors and subcontractors, as well as their staff members.

## What can be reported?

Reports may concern:

- Criminal offenses (corruption, fraud, etc.);
- Serious violations of the law or the ethical charter;
- Serious threats to the public interest (public health, environment, etc).

In case of doubt about the legality of a practice or behaviour, employees should consult their manager for guidance. If the manager is the author of the incriminated behaviour, the employee should contact HR or CSR management for advice.

## Conditions for Whistleblower Protection

To benefit from whistleblower protection, the following cumulative conditions must exist:

- a. Be a natural person;
- b. Report without seeking direct financial compensation;
- c. Act in good faith, reporting facts reasonably believed to be accurate and honest at the time of submission;
- d. Report information concerning a crime, offense, threat or harm to the public interest, a violation or attempt to conceal a violation of an international commitment ratified by France, an act of an international organization based on such commitment, EU law, national law or regulation, or a violation of the company's ethical charter;
- e. The information must be personally known or reported to the whistleblower.

## How to Submit a Report?

Reports can be submitted anonymously, with the possibility of maintaining anonymity throughout the process.

Reports should be sent by email to [alerte@wolf-sa.fr](mailto:alerte@wolf-sa.fr).

The whistleblower should attach any facts, information, or documents available, regardless of form or medium, to support the report.

Non-anonymous whistleblowers should also provide evidence that they meet the conditions for whistleblower protection.

## How Are Reports Handled?

### Acknowledgment of Receipt

The whistleblower will be informed in writing of receipt of the report within seven business days.

### Review and Admissibility

The internal whistleblowing officer reviews the admissibility of the report and may request additional information. Anonymous reports will be reviewed if the seriousness of the facts is established and factual details are sufficient. If the report and documents do not establish seriousness, the officer will draft a verification report and conclude inadmissibility with justification. The whistleblower will be informed of this decision and the option to use an external channel. The company may still decide to process the report. If the alert is deemed serious and well-founded, the officer proceeds with investigation.

### Information on Follow-Up

Within three months of acknowledgment, the officer will inform the whistleblower in writing of measures taken or planned to verify the allegations and, if possible, remediation measures.

### Closing the Procedure

The procedure closes when the report is deemed inadmissible or after processing an admissible report. The officer formalizes conclusions in a written report including facts, investigation methodology, collected elements, and recommendations.

## Responsible Parties

Report collection is the responsibility of CSR management.

Report handling is jointly managed by Finance, HR, and CSR departments to ensure transparent, fair, prompt, and consistent processing.

If the report concerns one or more of these officers, the whistleblower may address it to general management.

## Whistleblower Guarantees

### Confidentiality

The identity of the whistleblower, persons involved, and reported facts will be treated as strictly confidential.

Any breach of confidentiality may result in criminal (imprisonment, fines) and civil (damages) penalties.

## Personal Data Protection

Data protection will comply with GDPR, LIL, and CNIL guidelines.

Only the following data categories may be processed:

- identity, role, and contact details of the whistleblower;
- identity, role, and contact details of persons subject to the alert;
- identity, role, and contact details of persons involved in handling the alert;
- reported facts;
- elements collected during verification;
- verification report;
- follow-up actions.

The designated contact person and authorized personnel only have access to this data within the scope of their responsibilities and to the extent necessary for the performance of their duties. Data subject to archiving measures is stored, within a separate, restricted-access information system, for a period not exceeding the time limits for legal proceedings.

Data relating to a report will be retained, archived, and destroyed as follows:

- In the case of an inadmissible report, the data is archived for a maximum of two years and then destroyed.
- When the report does not lead to disciplinary or legal proceedings, the data is archived for a maximum of two years and then destroyed.
- When disciplinary proceedings or legal action are initiated against the person implicated or the author of a false report, the data is retained until the conclusion of the proceedings.

In accordance with applicable regulations, individuals identified within the framework of this system have the right to access, rectify, and object to the processing of their personal data.

## Protection Against Retaliation

No retaliatory measures may be taken against a whistleblower acting in good faith. Any attempt at retaliation may result in disciplinary and/or judicial sanctions.

## Useful Documents

(In French only)

[Guide du lanceur d'alerte](#) sur le site du défenseur des droits

[Guide Dispositif d'alerte interne](#), de l'Association Française des juristes d'entreprise (AFJE) et Cercle d'éthique des affaires (CEA)