

SAPIN II ACT WHISTLE-BLOWING PROCEDURE


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1. Purpose:

This procedure falls under French Act No. 2016-1691 known as the **“Sapin II Act” of 9 December 2016, relating to transparency, the fight against corruption and the modernisation of economic life** ⁽¹⁾ **amended by the Act of March 21, 2022**⁽²⁾. It specifies the rules and procedures for collecting, processing and following up on reports.

This procedure is complementary to the escalation of reports through line managers, as previously practised, and to the texts and arrangements already in place such as the internal rules or any other procedure in force.

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The first version of the procedure was the subject of an initial consultation of the CSE on December 1, 2020. **This procedure has been updated to take account of Law no. 2022-401 of March 21, 2022, known as the “Waserman Law”** (*link in point 2 of Appendix 2*), which aims to improve whistleblower protection.

This document can be consulted by employees on the France Médias Monde corporate website (<https://www.francemediasmonde.com>) and on the FMM intranet site (<https://francemm.sharepoint.com/sites/Sapin2>). It is also available on the whistle-blowing platform at the following address:

<https://alertefrancemm.integrityline.fr/>

The persons who may be the subject of a professional alert are all internal and external employees of France Médias Monde (*see details in point 2. Scope*).

It should be noted that the purpose of this document is to describe FMM's internal whistleblowing procedure, but that its use by employees is optional and that whistleblowers can choose between the “internal channel”, i.e. the present system, and the “external channel”.


In the latter case, the whistleblower may send an external alert, either after having made an internal alert under the conditions set out in the present system, or, directly, to one of the authorities referred to in paragraph II of Article 8 of the Law of December 9, 2016 as amended by the Law of March 21, 2022.

No penalty may be incurred in the event of non-use of the internal whistleblowing system.

This being said, it should be emphasized that the normal functioning of an organization must allow alerts relating to a malfunction, in any area whatsoever, to go up to management via the hierarchical channel or through open alert methods such as recourse to employee representative bodies. In this way, the system complements but does not replace the usual channels of communication within France Médias Monde.

With regard to **harassment alerts**, FMM has deployed a dedicated alert system. Although hosted on the same secure platform, it follows its own procedure administered by the Human Resources Department. However, harassment incidents originating from foreign subsidiaries can be reported as a Sapin II alert.

Author: Audit and Internal control unit	
Application date: 27/09/2021	

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2. Scope:

The whistle-blowing procedure applies to **all companies of the France Médias Monde group established in France and abroad, with the exception of CFI**, which has its own procedure.

It concerns the submission of reports under:

- Article 17 of Law n°2016-1691 of December 9, 2016: relating to conduct or situations contrary to the Code of Conduct insofar as these would be likely to characterize offenses including acts of corruption or influence peddling.

The nature of these reports is open to FMM Group employees only.

- Articles 6 to 15 of Law n°2016-1691 of December 9, 2016 relating to:

- ✓ a crime or misdemeanor;
- ✓ a threat or harm to the general interest;
- ✓ a violation or attempted concealment of a violation of an international commitment regularly ratified or approved by France;
- ✓ a violation or an attempt to conceal a violation of a unilateral act of an international organization taken on the basis of a regularly ratified international commitment;
- ✓ a violation or attempted concealment of a violation of the law or regulations;
- ✓ a violation or attempted concealment of a violation of European Union law.

It should be noted that the law specifies that “the alert may not, however, relate to elements (facts, information or documents, whatever their form or medium) the revelation or disclosure of which is prohibited by provisions relating to national defense secrecy, medical secrecy, the secrecy of judicial deliberations, the secrecy of judicial investigations or investigations, or the professional secrecy of lawyers.”

These reports may be issued by: corporate officers, employees, external and occasional employees of FMM on assignment of at least 3 months on the company's premises, to co-contractors of the entity concerned, to their subcontractors or, in the case of legal entities, to members of the administrative, management or supervisory bodies of these co-contractors and subcontractors, as well as to members of their staff.

Author: Audit and Internal control unit	
Application date: 27/09/2021	

3. Roles and Responsibilities:

The whistle-blowing procedure, the operating plan of which is summarized in Appendix 1 of this procedure, consists of the following actors:

3.1 - The whistle-blower:

A whistleblower is a person who makes a report, acts in good faith and without direct financial consideration. This person must be a natural person. The whistle-blower may be an employee of France Médias Monde, or a person from outside the company listed in the previous point.

The Sapin 2 Act defines the whistle-blower as follows:

A whistleblower is a **natural person** who reports or discloses, **without direct financial consideration and in good faith**, information relating to a crime, an offence, a threat or harm to the general interest, a violation or an attempt to conceal a violation of an international commitment duly ratified or approved by France, a unilateral act of an international organisation taken on the basis of such a commitment, European Union law, the law or regulations. Where the information was not obtained in the course of the professional activities mentioned in I of Article 8 of the Sapin II Act of 9 December 2016, the whistleblower must have had personal knowledge of it.

Facts, information and documents, regardless of their form or medium, the revelation or disclosure of which is prohibited by the provisions relating to national defence secrecy, medical secrecy, the secrecy of judicial deliberations, the secrecy of judicial investigations or investigations or the professional secrecy of lawyers are excluded from the whistleblowing regime defined in this chapter.

Whistleblowers may choose to make anonymous reports. However, these will only be processed if the seriousness of the facts mentioned is established and the factual elements are sufficiently detailed.

All anonymous whistleblowers will be examined in advance by the Ethics Officer and the Analysis Unit to determine whether they should be dealt with under the system. The alert will only be taken into account if the elements communicated in support of the facts reported are sufficiently serious or conclusive to suggest their reality or existence. Otherwise, the anonymous alert will not be processed and will be destroyed immediately.

When a report or public disclosure has been made anonymously, the whistleblower enjoys the same protection. However, if the identity of the whistleblower is not known, protection will be more difficult to ensure.

Whistleblowing in bad faith may constitute slanderous denunciation, punishable under article 226-10 of the Criminal Code by up to 5 years' imprisonment and a fine of €45,000.

3.2 - The ethics contact:

The ethics contact performs the following tasks:

- Receiving and analysing reports of conduct or situations contrary to the law or the Code of Conduct of FMM and its subsidiaries which may be submitted to it directly by the whistle-blower or indirectly by the line managers;
- exercising due diligence to verify, within a reasonable time, the admissibility of the report, including:
 - if the person initiating the report meets the definition of a whistle-blower,
 - if the facts invoked fall within the scope of the ethical report within the meaning of the law.
- Anonymising the reports received before sending them to the analysis unit, internal or external experts;
- Informing the person making the report:
 - of the receipt of their report,
 - of the reasonable and foreseeable time period necessary for examining its admissibility,
 - follow-up to their report;
- Informing the person(s) covered by the report;
- Coordinating investigations conducted internally or with external assistance;
- Managing response times;

- Answering or coordinating the answers to any questions asked by the employees of the ethics contact;
- Informing the analysis unit regularly and at least once a year;
- Following up on reports to the analysis unit;
- Managing the technical procedure for receiving and processing reports;
- Presenting annual reports to the audit committee.

These tasks are entrusted to the heads of the Audit and Internal Control Unit:

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3.3 - The analysis unit:

The purpose of the analysis unit is to:

- ensure proper compliance by all employees, suppliers and partners with the requirements of the code of conduct;
- Judging, in support of the ethics contact, the admissibility of reports within a reasonable time period;
- responding, in support of the ethics contact, to their questions about the interpretation and/or application of the Group's Code of Conduct;
- addressing any questions related to the prevention and fight against corruption;
- deciding on the follow-up to be given to the reports and alerts that will be sent to it via the ethics contact.

The analysis unit may meet at any time, as often as necessary, to know and deal with any questions, reports or alerts that may be received by it.

It may request the support and/or presence of any employee or any person outside the company to enable them to inform or enlighten themselves.

In any event, it will meet at least once a year in the presence of the Chief Executive Officer, for a review of the activities of the past year.

In accordance with the French anti-corruption system, the analysis unit and each of its members undertake to exercise their prerogatives strictly confidentially.

The analysis unit consists of:

- the CEO
- the Director of Human Resources
- the Legal Director
- the Administrative and Financial Director
- the Director of Communication and Institutional Relations

When the report concerns a foreign subsidiary, the director of the subsidiary concerned will be associated with the analysis unit.

In the event of the absence of one of the members of the analysis unit, it cannot be represented or entrusted with assignments to another employee (except for a long-term absence). The quorum for decision-making by the analysis unit to be valid is 2 members.

If one of the members of the analysis unit is directly or indirectly implicated by the alert, he or she will not be asked to process the alert and will not have access to any information relating to this alert through the platform or by any other means.

The Managing Director is Chairman of the analysis unit without a casting vote. If there is no majority, the opinion of the Chief Executive Officer will be requested.

The analysis unit designates a case manager for each alert. The choice of the case manager is free (ethics referent, member of the analysis unit or other).

3.4 - The internal expert:

When a report is deemed admissible and it is necessary to conduct additional investigations, the analysis unit may use one or more internal experts within the different departments or subsidiaries of FMM.

The internal expert acts under the responsibility of the analysis unit and under the coordination of the ethics contact. Their line managers are informed that an assignment is entrusted to them without revealing the details of the assignment.

The internal expert's mission is to:

- investigate all or part of the facts through interviews, data collection;
- report the results of their investigation to the ethics contact and the analysis unit through interviews or written communications exclusively via the platform.

They are subject to a confidentiality obligation, in particular with regard to the facts reported and the persons called into question. They must ensure with the ethics contact, throughout their investigation, that the initiatives taken are not likely to compromise the confidentiality of the information.

In addition, if necessary and depending on the skills required for the proper conduct of investigations, the FMM Group may call on **external experts**, ensuring that the subcontractor complies strictly with all security measures designed to maintain the confidentiality of data and exchanges.

4. Process

4.1 - Collecting reports

a. Internal reporting:

Individuals who, during their professional activities, have obtained information relating to facts that have occurred in the entity concerned may report this information internally.

As mentioned above, before triggering an internal alert, and if the employee believes that the violation can be effectively remedied through this channel and that it does not expose him or her to a risk of reprisals, he or she is strongly encouraged to discuss the matter with his or her immediate superior or the latter's superior as a matter of priority.

The author of the alert shall endeavour to provide information that is as accurate and faithful as possible to the reality of the facts that he himself has witnessed. To enable rigorous analysis and effective handling of the alert, it is preferable that it be documented, particularly in terms of:

- background and history
- locations
- dates and times
- persons involved
- description and frequency of the facts observed

They must send their report to the dedicated platform.

Whenever possible, the report should be accompanied by material evidence (photos, files, etc.).

Documentation of the alert may also be added at a later date, either spontaneously or at the request of the Ethics Officer.

The person making the alert may contact the Ethics Officer directly.

In this case, the communication is made by connecting from the terminal of their choice (workstation computer, personal computer, tablet, smartphone, etc.) to the secure external platform linked below:

<https://alertefrancemm.integrityline.fr/>
This site is not listed in search engines. You must enter this address.

The form should preferably include the contact details of the sender of the professional alert. It is strongly recommended that the alert should not be anonymous. However, if the person making the alert wishes to remain anonymous, his or her alert will only be taken into account if the information provided in support of the facts reported is sufficiently serious or conclusive to suggest the reality or existence of the matter. Otherwise, the anonymous alert will not be processed and will be automatically destroyed.

The secure external platform offers the following functions:

- It receives every alert from employees,
- It enables secure exchanges between the various players (internal or external to FMM),
- It provides continuous monitoring of alert processing,
- It provides a secure workspace for storing and archiving files for use by the people in charge of the files.
- It enables regular reporting on alerts and the action taken,
- It enables alerts to be made anonymous, archived and deleted within the legal deadlines.

b. External reporting:

Any whistleblower may also send an external alert, either after having made an internal alert or directly:

- To one of the competent authorities designated by Decree no. 2022-1284 of 3 October 2022;
- To the "Défenseur des droits", who will direct the whistleblower to the authority or authorities best placed to deal with the matter;
- the judicial authority;
- To an institution, body, office or agency of the European Union competent to collect information on violations falling within the scope of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019.

In the case of an external alert, processing is carried out by the requested authority in accordance with the procedure for collecting and processing alerts defined in accordance with the provisions of Decree no. 2022-1284 of 3 October 2022.

c. Public disclosure:

The whistleblower may, under certain very strict conditions listed below, make a public disclosure.

- After having made an external report, whether or not preceded by an internal report, without any appropriate action having been taken in response to this report at the end of the feedback period or, where an authority has been seized, at the end of the period set by decree in the "Conseil d'Etat";
- In the event of serious and imminent danger;
- Or when referring the matter to one of the competent authorities would expose the person making the report to a risk of reprisals or would not enable the subject of the disclosure to be dealt with effectively, due to the particular circumstances of the case, in particular if evidence may be concealed or destroyed or if the person making the report has serious grounds for believing that the authority may have a conflict of interest, be in collusion with the person making the report or be implicated in it.

4.2 - Review and processing of reports

The whistle-blowing procedure guarantees confidentiality and respect for the rights of each person in the processing of the steps taken. Respect for the confidentiality and rights of everyone is binding on everyone involved in the process:

- In the analysis unit,
- and more generally, any person in charge of collecting, processing a professional alert or likely to provide information in the context of the investigations carried out.

Indeed, these persons undertake to respect a confidentiality obligation, not to use the data and information for misappropriated purposes, to respect their limited retention period and to destroy them, in accordance with these rules. Breach of this confidentiality constitutes an offence sanctioned by law ⁽²⁾.

When reviewing and processing the report, the ethics contact will ensure that only the data and information necessary for the verification and processing of the report is communicated.

Only the facts, data and information expressed in good faith and without self-interest shall be taken into account, that are directly related to the areas falling within the scope of the alert procedure, and strictly necessary for verification operations.

Discussions with the whistle-blower are conducted exclusively through the secure platform to ensure the confidentiality of the information.

▪ **Step 1: Acknowledgement of receipt**

On receipt of the report, and no later than within 7 working days, the ethics contact shall acknowledge receipt of the alert from the whistle-blower via the secure platform. **The acknowledgement of receipt does not mean the report is admissible.**

The acknowledgement of receipt summarises all the information and, where appropriate, the attachments sent as part of the report.

The ethics contact shall inform the whistle-blower of the foreseeable time required to examine its admissibility, which shall not exceed two months.

▪ **Step 2: Admissibility Review**

The ethics contact, in collaboration with the analysis unit, then conducts a preliminary assessment, treated confidentially, in order to determine, prior to any investigation, whether it falls within the scope of the procedure.

The preliminary assessment may lead to:

- a. Declaring the report inadmissible
 - b. Requesting additional information from the whistle-blower
 - c. Declaring the report admissible
-
- a. **If the alert is not admissible**, the referrer shall inform the whistle-blower and close the procedure. All data communicated shall be destroyed within 2 months of the close of the procedure unless it is necessary to demonstrate an abuse of the whistle-blower system. In the latter case, the ethics contact may decide to alert the line managers and/or authorities concerned.
 - b. **In case of doubt as to the admissibility** of the report, the ethics contact:
 - may ask the whistle-blower for additional information.
 - They may also contact the analysis unit either through the secure platform or by requesting a meeting.

In all cases, it shall inform the whistle-blower of the foreseeable time required to examine the admissibility of the report.

- c. **If the report is found to be admissible**, the case manager shall investigate the facts referred to in the report.

▪ **Step 3: Report processing**

Persons directly or indirectly affected by a report deemed admissible shall be informed by the ethics contact as soon as they are registered or as soon as the protective measures necessary, in particular to prevent the destruction of evidence, have been taken.

This information is made by registered letter.

The information provided to any relevant person ⁽³⁾ is:

- the alleged facts,
- the services informed of the report,
- the procedures for exercising their rights of access and rectification, as well as a copy of this procedure.

The persons covered by a report may access the recorded data and exercise their rights by sending their request to the ethics contact in the same forms as those provided for reports. On the other hand, they may not under any circumstances obtain, on the basis of their right of access, information concerning the identity of the whistle-blower.

The ethics contact carries out the necessary investigations and verifications of admissible reports or coordinates the work carried out when, with regard to the purpose of the report, an internal expert is required:

- jointly with the Chair of the analysis unit and, where applicable, the members of the analysis unit and the ethics referents if they are not themselves in charge of the file,
- with the assistance, if necessary, of any other company department or third party outside FMM. Those persons are then bound by the same obligations as the ethics contact.

The analysis unit shall ensure that appropriate investigations are carried out and decide on the follow-up to be taken concerning any deficiencies found, such as referral to the line managers to initiate disciplinary proceedings where necessary, or referral to the administrative or judicial authorities.

In carrying out their investigative duties, the ethics officer and the analysis unit guarantee:

- the confidentiality of all data and information received and used in the context of his investigative mission, except in cases where the handing over of information is required by law;
- the exhaustive analysis of all data, information or documents on the basis of which its action is required;
- the initiation of a procedure appropriate to the circumstances and always governed by independent action;
- no disciplinary action will be taken against the author of a professional alert made in good faith.

France Médias Monde guarantees the confidentiality of the information gathered in the context of the alert and undertakes to ensure that the alert is dealt with within a reasonable period of time.

Where necessary, France Médias Monde may outsource all or part of the alert processing procedures, strictly ensuring that the subcontractor complies with all security measures designed to preserve the confidentiality of data and exchanges.

Once the report has been processed, the ethics contact shall inform the person making the report and, where applicable, the persons covered by it, of the closure of the report without specifying the processing that has been carried out.

Guarantees offered to the subject of a professional alert

The person who is the subject of an admissible alert is informed by the Ethics Officer as soon as the data concerning him or her is recorded, so that he or she can, if necessary, object, on legitimate grounds, to the processing of this data.

Where precautionary measures are necessary, in particular to prevent the destruction of evidence relating to the alert, this person is informed after these measures have been taken.

The identity of the person who is the subject of a whistleblowing report is treated as **strictly confidential**.

Accordingly, information identifying the person who is the subject of a whistleblowing report may not be disclosed, except to the judicial authority, until it has been established that the report is well-founded.

4.3 - Follow-up on reports

The analysis unit shall be kept informed by the ethics contact of the reports, requests and questions at each of its meetings during the previous period, as well as the result of the investigations following such reports.

The Ethics Officer also informs the Audit Committee on an annual basis of the volume and nature of reports, in statistical terms and while maintaining the same confidentiality owed to the persons concerned, of requests and questions during the past year, without giving details.

The facts brought to the attention of the analysis unit and the Audit Committee are anonymised in order to ensure the confidentiality and protection of personal data while making it possible to update the mapping of the company's corruption risks.

4.4 - Submitting questions or requests

The whistle-blowing procedure also allows the persons concerned by the Code of Conduct to ask questions to the analysis unit or to the ethics contact or to submit any request concerning the interpretation of this document.

Under no circumstances must a request have the effect of directly or indirectly accusing a person. However, if that were the case, the request would be treated as a report.

The system for collecting questions and requests consists of two channels: the hierarchical channel reserved for the staff of France Médias Monde and its subsidiaries, and a direct channel to the ethics contact open to all the issuers of the request through the secure platform whose link is provided below:

<https://alertefrancemm.integrityline.fr/>

The choice of channel is at the discretion of the issuer of the request.

The ethics contact, possibly assisted by the analysis unit, shall ensure that a precise response is given to the requests communicated to them, providing, where appropriate, information on the behaviour to be taken by their issuer.

The data collected for a question or request are as follows:

- the identity, duties and contact details of the person making a request,
- the identity, functions and contact details of the persons involved in the collection or processing of the request,
- the request with, if possible, the identification of the parts of the Code of Conduct whose interpretation is requested and, where applicable, the description of the situation giving rise to the request and the period during which this situation is likely to continue,
- the follow-up on the request.

Although it does not have the legal protection afforded to the whistle-blower, the identity of the issuer of a request will be treated in a confidential manner by the ethics contact and the analysis unit.

5. Protecting the whistle-blower

No authority issues the whistle-blower status; however, **the whistle-blower protection regime will apply if they meet the following criteria:**

1. It is a **natural person**
2. The alert is made **without financial consideration and in good faith**
3. **Have personal knowledge of the facts** (when the information was not obtained in the course of professional activities)
4. The warning does not concern **elements** (facts, information or documents, whatever their form or medium) **'the revelation or disclosure of which is prohibited** by provisions relating to national defense secrecy, medical secrecy, the secrecy of judicial deliberations, the secrecy of judicial enquiries or investigations or the professional secrecy of lawyers'.
5. The report was made **in compliance with the reporting procedure** as defined by law.

When dealing with whistleblowers, the Company ensures that the identity of the person who issued the alert is kept strictly confidential.

Accordingly, information that could identify the sender of the professional alert may not be disclosed, except to the judicial authorities, without the sender's consent.

Author: Audit and Internal control unit	
Application date: 27/09/2021	

All persons with knowledge of alerts made using the System are required to maintain the strictest confidentiality with regard to all such information, in particular that relating to the identity of the Sender of the alert.

The authors of alerts or the senders of requests having used the alert system in good faith, including in cases where the outcome of the processing of the alert does not reveal any fault and/or offence or if the facts reported turn out to be inaccurate or erroneous, or if they result from information disseminated in bad faith by persons other than the author of the alert, but which the latter reports in good faith, may not be penalised or discriminated against.

Whistleblower protection also applies, where applicable, to:

- Facilitators (any natural person or any legal entity under private non-profit law who helps a whistleblower to make a report);
- Individuals in a relationship with a whistleblower (relatives, colleagues)
- Legal entities controlled by a whistleblower for whom he or she works or with whom he or she has a professional relationship.

The whistleblower is not criminally liable for violating secrets protected by law, provided that disclosure is necessary and proportionate to safeguard the interests in question.

The Whistleblower acting in good faith and in a disinterested manner may not be dismissed, penalised or discriminated against in any way whatsoever for having reported facts in compliance with this procedure, even if the facts subsequently prove to be inaccurate or do not give rise to any follow-up.

If the whistle-blower has acted in bad faith, they lose the protection available to the whistleblower. They then face disciplinary sanctions, as provided for in the sanction regime of the internal regulations of FMM and its subsidiaries, and, where applicable, to legal proceedings. This will be the case in particular in the event of ill-intentioned, vexatious or defamatory allegations or abusive reports.

These provisions are included in the Labour Code ⁽⁴⁾.

Defamation against a whistle-blower is sanctioned by law ⁽⁵⁾.

6. Processing of personal data

When a professional alert is received, the data is processed automatically. The System is managed by FMM as data controller.

In the event of a professional alert, only the following categories of data may be recorded:

- the identity, duties, and contact details of the person making the report,
- the identity, duties, and contact details of the persons that may be the subject of the report,
- the identity, duties, and contact details of the persons involved in the collection or processing of the alert,
- the facts reported,
- the evidence collected as part of the verification of the facts reported,
- the report of the verification operations,
- the follow-up to the report.

The security of personal data is ensured. Access to reporting and request data is protected. This data is protected by an individual username and password, which is changed regularly. Such access shall be recorded and their regularity checked.

Retention period for personal data

Data relating to a professional alert considered by the Ethics Officer as not falling within the scope of the System will be destroyed or archived without delay, after anonymisation.

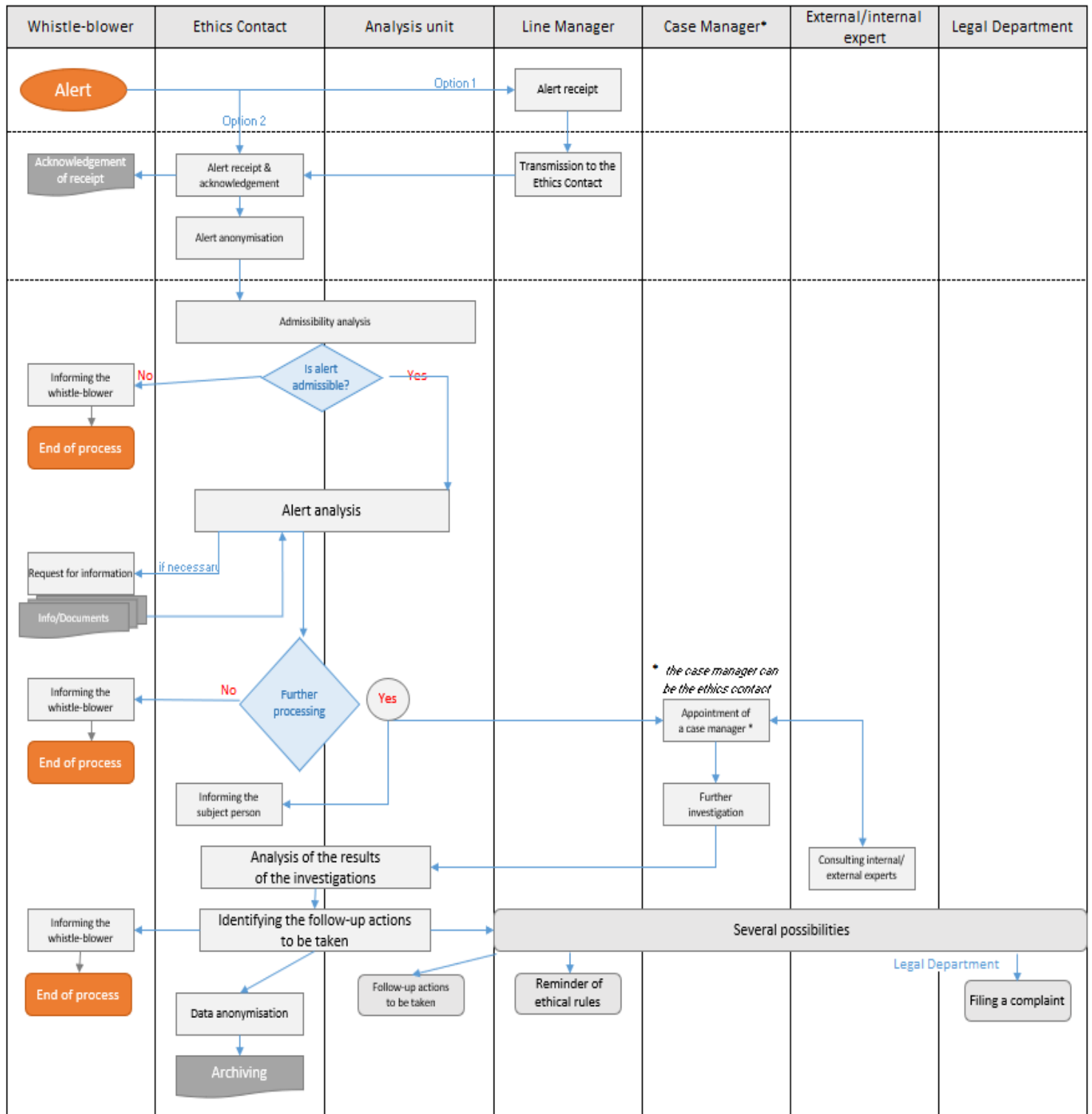
If the professional alert is not followed by disciplinary or legal proceedings after investigation, the data relating to this alert will be destroyed or archived, after anonymisation, by the Ethics Officer within two months of the completion of all verification operations.

The sender of the professional alert, as well as the persons concerned by it, will be informed of this closure.

When disciplinary proceedings or legal proceedings are initiated against the person implicated or the issuer of an abusive alert, the data relating to the professional alert is kept by the Ethics Officer until the end of the proceedings.

7. Appendices

Appendix 1: Scheme for the organisation of the whistle-blowing procedure



Appendix 2: Legal references:

⁽¹⁾ *FMM scrupulously monitors compliance with the provisions of Act No. 2016-1691 of 9 December 2016 on transparency, anti-corruption and modernisation of the economy, known as the Sapin II Act.*

<https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000033558528&categorieLien=id>

Decree No. 2017-564 of 19 April 2017 on the procedures for collecting reports issued by whistle-blowers within legal entities governed by public or private law or state administrations

<https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000034443268&categorieLien=id>

CNIL deliberation No. 2017-191 of 22 June 2017 amending deliberation No. 2005-305 of 8 December 2005 on the single authorisation of automated processing of personal data implemented as part of whistle-blowing systems

<https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000035268495&categorieLien=id>

⁽²⁾ **Act no. 2022-401 of 21 March 2022 to improve the protection of whistleblowers**

<https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000045388745>

Decree no. 2022-1284 of 3 October 2022 on procedures for collecting and processing whistleblower alerts and setting the list of external authorities established by Act no. 2022-401 of 21 March 2022 to improve the protection of whistleblowers

<https://www.legifrance.gouv.fr/loda/id/LEGIARTI000046357779/2022-10-05/>

⁽³⁾ **Article 9 of Act No. 2016-1691 known as Sapin II:** Disclosing confidential information of the report is punishable by two years' imprisonment and a €30,000 fine.

⁽⁴⁾ **Deliberation No. 2017-191 of 22 June 2017 of the CNIL.**

⁽⁵⁾ **Article L.1132-3-3 of the French Labour Code** as amended by Act No. 2016-1691 of 9 December 2016 - Art. 10

⁽⁶⁾ **Article 12 of Act No. 2016-1691 known as Sapin II:** an abusive complaint for defamation against a whistle-blower is punishable by a civil fine of €30,000.