



CONDUCT AND ETHICS

SECOURS CATHOLIQUE-CARITS FRANCE ALERT SYSTEM PROTECTION OF PEOPLE AND PROPERTY

→ SCOPE OF THE ALERT SYSTEM

The purpose of this alert system, which is based on the Code of Conduct and Ethics, is to enable the SCCF to collect and process reports of conduct or situations that may constitute a breach of the rules applicable in all its entities.

The main aim is to protect the actors and stakeholders of the SCCF and, if necessary, the victims by facilitating the referral of cases to internal and external bodies, depending on the facts in question.

The alert system thus allows :

- ▶ to report violations of the SCCF Code of Conduct and Ethics;
- ▶ to report illegal or fraudulent acts in the accounting, financial or banking fields, or on issues related to the fight against corruption; and, more broadly, to guarantee the reporting of all illegal acts to the Alert Committee.
- ▶ to report discrimination, harassment or serious incidents of non-compliance with health, hygiene and safety and environmental protection legislation;
- ▶ to report any facts constituting a threat or serious prejudice to the public interest.

This warning system is complementary to the other existing systems at Secours Catholique (employees' right to warn and withdraw, child protection procedure, conflict management within a delegation office, HR procedure to prevent harassment, etc.). **It must not in any way hinder the reporting of illegal acts to the judicial or police authorities**, especially when such reporting is a legal obligation - it is therefore never a compulsory prerequisite for the actors who can always refer the matter directly to the judicial or police authorities.

Although the SCCF's Code of Conduct and Ethics covers broader issues than those covered by the Sapin II law, the procedure put in place respects this law in order to ensure that the whistleblower has the status of whistleblower (and the related protection).



→ EXERCISE OF THE RIGHT TO ALERT

1. Who?

Anyone can report on any of the areas covered by the Code of Conduct and Ethics, i.e. volunteers, employees, consultants, donors, partners, beneficiaries and other stakeholders.

The report must be made in good faith. Any abuse may be sanctioned.

2. How?

The report is made to the person directly or indirectly responsible: member of the office, the employee's line manager (n+1, or n+2, or n+3...) or functional manager, team manager, territorial or thematic volunteer referent, etc.

When the circumstances do not allow for a report to be made to the person directly or indirectly responsible, the whistleblower can contact the Alert Committee directly by sending an e-mail to alerte@secours-catholique.org or a letter, marked confidential, to [Secours Catholique, Comité d'alerte, 106 rue du Bac, 75007 PARIS, FRANCE](#).

The Alert Committee is composed of four people appointed by the SCCF national office, recognized for their capacity of judgment and analysis and for their integrity (morality, independence and impartiality); it is independent of the governance of the SCCF, which cannot issue any directives.

Any player who receives a direct alert must immediately inform the Alert Committee. The Alert Committee may also be called upon to answer any questions on the interpretation and scope of the Code of Conduct and Ethics.

All recipients of an alert are subject to an obligation of strict confidentiality regarding the identity of the sender of the alert, the facts that are the subject of the alert and the persons to whom the alert refers.

3. Content of the alert ?

The alert should, in principle, be sent by confidential marked mail or by secure email to the attention of the recipient of the alert. If the report is made by telephone or during an interview, it must subsequently be confirmed in writing. The facts must be stated in a precise and objective manner. Any document that could support the alert must be transmitted.

Anonymous alerts are also admissible, provided that there is sufficiently precise and serious information to deal with them.



Alerts that fall within the scope and conditions of the alert procedure must be issued in good faith and in a disinterested manner. The recipients are responsible for verifying the authenticity of the alert. Any alert that is clearly outside the scope of the procedure, that is not serious and that is made in bad faith or that constitutes an abusive or slanderous denunciation, may give rise to sanctions (disciplinary, criminal, etc.).

→ ALERT HANDLING

An acknowledgement of receipt is sent within 48 hours of receipt of the alert. Thereafter, the alert is subject to a preliminary assessment, which is treated confidentially by the recipient (or by the Alert Committee when the matter is referred to it), in order to determine, prior to any investigation, whether the alert falls within the scope of the procedure.

In accordance with the Sapin II law on whistleblowers, the latter will be informed of the receipt of their alert and of the follow-up of its treatment by the recipient, with a first return at the latest within 2 months following the receipt of the alert. If not, he/she is invited to refer the matter to the competent administrative authority, the judge and/or the professional order. If one of these bodies does not deal with the alert within three months, it may be made public.

In the event of serious and imminent danger or risk of irreversible damage, the issuer may refer the matter directly to the judge or to civil society - this is particularly the case when there is a risk of personal injury.

→ PROTECTION OF THE PERSONS CONCERNED BY THE ALERT: SENDER AND TARGET

Every precaution is taken to ensure the strict confidentiality of the identity of the person who issued the alert, at all stages of the study and processing of the situation, subject to the requirements of the investigation.

The same confidentiality is guaranteed with regard to the persons concerned by the alert and the facts reported.

Regardless of the recipient, all alerts falling within the scope of the system and any follow-up action taken are recorded in a secure database, the strict confidentiality of which is ensured (encryption, anonymization) in compliance with the provisions of national laws and in particular the French Data Protection Act and the General Regulation on the Protection of Personal Data (RGPD) (see below).

The sender of the alert may not be sanctioned, dismissed or subjected to any direct or indirect discriminatory measure for having reported an alert.

Any person who obstructs, in any way whatsoever, the transmission of an alert shall be liable to sanctions.



→ COLLECTION AND RETENTION OF DATA COLLECTED IN COMPLIANCE WITH RGPD

The data collected and stored are within the legitimate framework of the application of the Code of Conduct and Ethics and in compliance with legal obligations (Sapin II Law, Labour Code).

It will be necessary to collect information on the identity of the actors, allegations and factual elements in order to conduct the investigation.

These data will be kept until the end of the procedure and the expiry of the appeal procedures. They are then destroyed or may be archived within a period of two months and kept beyond that period after **having been made anonymous**. Where the alert is not followed by disciplinary or judicial proceedings, the data relating to that alert are destroyed or archived, after being rendered anonymous, within two months of the closure of the investigation.