

Whistleblowing Policy

Sonepar has established a whistleblowing policy to provide a way for those who are aware of circumstances or behaviours which they believe, in good faith, could represent violations of Sonepar's Code of Conduct, Supplier Code of Conduct, Policies and Procedures and/or applicable laws and regulations, to identify and share those concerns.

How to raise a concern?

For associates, referring the matter to his/her manager is the preferred option.

If an associate is uncomfortable sharing concerns with his/her line manager, an associate can contact Sonepar's Human Resources Department (either at headquarter or local level) or the Group General Counsel's Office.

If an associate does not wish to interact with Sonepar's personnel, or if the person wishing to report is outside of Sonepar, a confidential whistleblower reporting system is available. It is provided by an independent third-party provider selected by Sonepar. Reports can be made at any time, 24 hours a day, in 20 different languages.

The platform can be accessed via the following link: <https://sonepar.integrityline.com/>

The reporting process is encrypted and password protected. Communication with the whistleblower takes place on this secured platform.

What can be reported?

Violations or possible violations may relate, without limitation, to the following areas:

- Human rights;
- Fraud;
- Corruption;
- Influence peddling;
- Data privacy;
- Harassment;
- International sanctions and embargoes;
- Health and safety;

- Environment;
- Discrimination;
- Any crimes or offences.

What information should be provided?

All reports should be as factual and complete as possible. Although the whistleblower's opinion may be requested during the process, speculation should be avoided.

Reports should contain information answering the following questions:

1. What happened?
2. When did it happen?
3. Who was or is involved?
4. Are the circumstances ongoing?
5. What is the risk or urgency of the situation?
6. How does the whistleblower know about these circumstances?
7. Are there witnesses or any other people affected by the situation?

If a whistleblower has documentation or other supporting evidence, he/she should make that known and available on the platform.

Confidentiality

The identity of the whistleblower, of those affected by the alert and any document shared in connection therewith, will be kept strictly confidential, unless Sonepar has a duty to report all or part of the information to an authority.

No Retaliation

Sonepar, its business partners and their associates shall take no action in retaliation against any person for making a good faith report or participating in an investigation.

Any person found to have retaliated against another for making a report or participating in good faith in an investigation will be subject to discipline, up to and including termination of employment.

Sonepar reserves the right to take disciplinary action against an associate who violates this policy by knowingly making false and/or malicious statements against another with the intent of misleading or wrongfully initiating an investigation.

Protection of Personal Data

Data collected through the Sonepar's whistleblowing system is processed in accordance with the requirements of the European General Data Protection Regulation (GDPR).

All necessary precautions are adopted to preserve the security of the data during collection, communication or retention. You have the right to access, modify and rectify your personal data.