



Whistleblower platform

[FAQ](#)

FAQ ROGER

OVHcloud whistleblower platform

This « frequently asked questions (FAQ) » is intended to help you to have a better understanding of OVHcloud whistleblower platform.

1. Why do we need ROGER platform?

Under article 17 of the French law against corruption (frequently called SAPIN II), the implementation of a whistle blowing system is a legal obligation: to collect reports from any stakeholders about any misconduct or situations that would violate OVHcloud code of ethics. This regulation applies to any French company with more than 50 employees.

2. ROGER, what is it?

R.O.G.E.R. stands for “Respect OVHcloud Guidelines & Ethical Rules”. It is OVHcloud whistleblower platform that anyone can use to report a violation of OVHcloud code of conduct, OVHcloud values and that can concern the following topics: fraud; embezzlement / theft; environmental damages; health, hygiene and safety; discrimination or harassment; violation of any law or regulation that applies to OVHcloud, potential situations of conflicts of interest, corruption or bribery.

3. How can I access ROGER?

You can connect to ROGER platform any time and with any device: computer, tablet or smartphone. To report something, simply connect to <https://ovhcloud-public.signalement.net/> and follow the instructions.

Last precision, this link points to the url of our external solution adopting the https protocol in order to allow you to consult the ROGER platform in complete security, whatever its content.

4. Who can use ROGER ?

ROGER is available to anyone who, in the context of his/her working relationship within OVHcloud or in the context of his/her relationship with the OVHcloud group, wishes to report a factual situation highlighting behaviour that does not respect the values and rules of our code of ethics. This reporter is called a whistleblower*.

5. *What is a whistleblower?

According to French law, a whistleblower is someone who reveals or reports, in a disinterested manner and in good faith, a crime or offence, a serious and manifest violation of an international commitment duly ratified or approved by France, a law or regulation, or a threat or serious prejudice to the general interest, of which he or she has personal knowledge.

We decided to open this definition to anyone wishing to report inappropriate behaviour or a fact contrary to the company's values.

Whistle blowers cannot be personally liable for their reports if:

- ▶ They are personally aware of the reported facts
- ▶ They are acting with good faith
- ▶ They do not get any personal profit or income for their report
- ▶ They do not aim to harm anyone with their report

The whistle blower cannot be fired, sanctioned or discriminated for his reporting.

6. What are the security and confidentiality criteria of the system?

The limited number of people having access to the information provided via ROGER are subject to a reinforced obligation of confidentiality and may not use this information for any other purpose. These persons, known as "referents", have signed a strong confidentiality undertaking. They would incur criminal liability if they breached this undertaking.

The platform is hosted by an external service provider, outside of OVHcloud's IT systems.

7. What is the process for reporting on ROGER?

The declaration is carried out in 4 steps. First, you need to log on to the ROGER platform. On this page, simply click on "Make a new report", choose the category of the report, fill in the contact information (if it's not an anonymous report) and then describe the facts and finalize it by validating and transmitting the report.

The whistleblower will receive a confidential and personal code allowing him/her to access his report from the ROGER page and to exchange private and confidential messages with the referents. [Heading "Access to an existing alert"]]

NB: For more information, you can find the complete process on the general page of the ROGER platform.

8. Can I remain anonymous when making my report?

Yes. Just tick the "Remain anonymous" box, so no identification data is required. In the case of an anonymous report, we may encounter difficulties in processing your report and may ask you (through the ROGER messaging system) for additional information during our investigations.

9. Are anonymous reports treated differently?

No, each report is treated in the same way by following the same process for collecting and processing a report. (See Question 10).

10. What happens after I declare my report?

First, the referents acknowledge receipt of the report. The alert then goes through 3 key steps:

- ▶ Admissibility of the report [maximum duration of 2 weeks],
- ▶ The processing of the report [maximum duration of 2 months].
- ▶ If the violation is proven, the referrers will enter the last phase of deployment of the action plan.

NB: For more information, you can find the complete process on the general page of the ROGER platform.

11. What are my protective measures if I become a whistleblower? Am I protected from retaliation?

No disciplinary or discriminatory action may be taken against employees who report an alert, even if the facts reported prove to be unfounded, provided that the employees acted in good faith.

OVHcloud refrains from taking direct or indirect reprisals against an employee who has reported a report.

12. Will the person(s) about whom I have issued a report be informed of the charges against him/her?

Yes, the principles of the adversarial process and the presumption of innocence must be respected and therefore each party identified in your report will be informed of the investigation. This information is transmitted following the conclusions of the investigation and at the appropriate time by the referents.

13. Will I be kept informed of the findings of the investigation?

Yes, each whistleblower receives a summary feedback of the conclusions of the report via the referents, through the Roger messaging system. It is therefore important to go there regularly to keep up to date with the progress of the report.

14. What is the retention period of the information?

The information is kept for 100 days after the report has been closed.

15. What happens in the event of false declarations?

If it appears at the end of the investigations that the report made by the whistleblower was made in bad faith or to damage someone's reputation, such behaviour may be subject to disciplinary action or legal proceedings by the person concerned by these false allegations.

16. What happens if I share a concern with you in good faith, but it later turns out that I was wrong?

If at the time you gave the information you thought it was honest, sincere and accurate, there will be no negative repercussions. Of course, if you realize after having expressed your concern that you were mistaken, please inform the referents immediately via Roger's messaging system.