



Whistleblower Policy

1. Application

Ethical and lawful business practices are the responsibility of everyone at Mirion. The procedures and requirements set forth in this Policy, therefore, apply to all officers, directors, managers, employees, temporary staff and contractors of Mirion. Line managers have a special responsibility to notify the Mirion Chief Compliance Officer of any concerns reported to those line managers by employees. Managers that ignore good faith reports, or discourage their subordinates from reporting good faith concerns, may face disciplinary action.

2. Reporting Suspected Violations and Concerns

2.1 Reporting. All Mirion employees and stakeholders are expected to report any suspected unlawful or unethical conduct or other compliance concerns as soon as they become aware of it. Employees and other stakeholders are reminded of Mirion's ongoing efforts to maintain an ethical workplace through its Code of Conduct, periodic training, and regular company-wide memos from the CEO. Reports may be made, at any time, on an anonymous basis, through any of the following channels:

- The Corporate Ethics Hotline via internet at <https://secure.ethicspoint.com/domain/media/en/gui/67521/index.html>
- Or via telephone (which will function in the relevant language) at

Belgium	0-800-100-10
Canada	877-516-3401
China	10-800-711-1176
Finland	0-800-11-0015
France	0800-91-3658
Germany	0800-188-8088
Japan	0120-907-324
United Kingdom	0808-234-0931
United States	1-877-516-3401
- The Employee's Line Manager
- The Mirion Chief Compliance Officer at compliance@mirion.com
- A Human Resources Manager or Director (especially reports of abusive workplace misconduct)
- The Chair of the Audit Committee of the Mirion Corporate Board of Directors (especially reports of concerns about senior management personnel)

2.2 Scope of Reports. Reports may be made anonymously (where permitted by applicable law), and Mirion will use its best efforts to maintain the confidentiality of the employee or other stakeholder making a confidential report, consistent with the Company's legal obligations. All reports of suspected misconduct must be made in good faith. Persons making reports in bad faith, without a factual basis, or for a malicious purpose, may be subject to disciplinary measures, including, in appropriate circumstances, termination of employment. An employee that makes a good faith, but mistaken, report of suspected misconduct is subject to the **No Retaliation Policy** described in Section 4.3 of this Policy.

Reports of suspected misconduct should include sufficient detail about the suspected violation of law or ethical breach in order to allow the Company to conduct a thorough investigation. A



report should, at a minimum, include: (i) details of the suspected misconduct; (ii) the date or dates of occurrence of the suspected misconduct; (iii) the basis of the reporter's knowledge of the suspected misconduct; and (iv) the person or persons engaged or involved in the suspected misconduct. If concerns or complaints require confidentiality, including keeping an identity anonymous, we will endeavor to protect this confidentiality, subject to applicable law, regulation or legal proceedings. All reports of suspected misconduct that are made in good faith will be investigated by the Company, in accordance with the procedures set forth in Section 5 of this Policy. It may not, however, be possible for the Company to conduct an investigation into the suspected misconduct if the information provided in the report is insufficient, and the reporter is unwilling or unable to furnish any additional information about that suspected misconduct.

2.3 No Retaliation. *Retaliation by any Mirion officer, director, manager or employee against any person who makes a good faith report of suspected misconduct in accordance with this Policy, either internally or to any governmental agency or entity or self-regulatory organization, will not be tolerated under any circumstances.*

Examples of impermissible retaliation may include one or more of the following acts, attempts or threats against the reporter in response to a good faith report:

- Suspension, lay-off, dismissal
- Demotion or withholding of promotion
- Reduction in wages or salary, or changes in working hours or conditions
- Negative performance reviews or employment references
- Imposition of any disciplinary measure, reprimand or penalty (including any financial penalty)
- Coercion, intimidation, harassment or ostracism
- Discrimination or unfair treatment

Acts of retaliation should be reported immediately, and any Mirion officer, director, manager or employee that engages in, or attempts or threatens any such retaliation against any employee or other stakeholder that submits a good faith report of suspected misconduct in accordance with this Policy will be subject to severe disciplinary action, including, in appropriate circumstances, termination of employment.

2.4 Complaints to Government Authorities. This Policy is not intended to prohibit or restrict any employee or other stakeholder from reporting suspected unlawful actions to competent government authorities in accordance with applicable law. Any employee or other stakeholder that makes such a report, in good faith, to competent government authorities will be subject to Mirion's No Retaliation policy, as set forth in Section 4.3 of this Policy. The Company does, however, encourage employees and other stakeholders to report any suspected misconduct or other concerns internally, through the channels identified in this Policy, so that the Company may properly consider and address those matters most efficiently and effectively.

3. Investigative Process

All reports are managed through a central case management system with appropriate functional and data protection access partitioning. Reports are monitored and managed by members of the Mirion Legal Department under the authority of the Chief Legal Officer ("CLO") who is also the Chief Compliance Officer ("CCO") through the Mirion Compliance, Conduct and Ethics ("CC&E") Committee, a cross-functional committee comprised of the CLO, the Chief Human Resources Officer ("CHRO"), the Chief Accounting Officer ("CAO"), the Senior



Director of Internal Audit, and the Compliance Director. The CC&E Committee reviews all reports on an ongoing basis and periodically reviews reports metrics and resolution progress. Upon receipt of any good faith report of suspected misconduct, the CLO/CCO will initiate an investigation into the suspected misconduct in accordance with the following steps.

3.1 Acknowledgement of Receipt. Except in the case of anonymous reports where no contact information is provided, the Company will provide the reporter with a written acknowledgement of receipt of the report. The Company will use its best efforts to provide that acknowledgement within 5 business days after receipt of the report. The acknowledgement will include: (i) a request for additional information, if required in order to initiate the investigation; (ii) a schedule for a confidential personal meeting with the reporter, if requested by the reporter; and (iii) the estimated timeline for conducting and completing the investigation. The acknowledgement will also include the steps being taken to protect the confidentiality of the reporter, if requested, and will include a reminder to the reporter of his/her duty to cooperate with the investigation, as provided in the Code of Ethics and Conduct.

3.2 Assignment of Investigative Team. Based on the information provided in the report, the CLO/CCO will determine the team to investigate the suspected misconduct. In the event of a possible conflict of interest affecting the CLO/CCO, the investigative team will be determined and constituted by the Chair of the Audit Committee.

Depending on the nature of the suspected misconduct, the investigative team may include Mirion personnel from the Legal Department, Compliance Department, Internal Audit, or Human Resources Department. The investigative team may also include outside specialists (e.g., attorneys, auditors, forensic accountants, etc.). All investigations will be conducted in accordance with the requirements of applicable law, and to that end, the CLO/CCO will consult with local legal advisors to address how local legal considerations (e.g., data privacy, cross-border data transfer, and employment laws) will affect the investigation. If any information or materials are not accessible by the investigative team due to local legal restrictions, those restrictions will be documented by the investigative team and that documentation will be retained as part of the investigation record.

3.3 Scope of the Investigation. The objective of any investigation will be to determine the relevant facts and circumstances of the suspected misconduct, the persons involved in the suspected misconduct, the root cause of the suspected misconduct, and the potential or actual consequences to the Company. To that end, the investigation may include review of relevant documents, including especially e-mail communications, and in-person interviews, where appropriate. The investigative team must be provided full access to all applicable records, materials and communications, and to all relevant Mirion personnel.

During the course of any investigation, the investigative team will provide periodic progress reports to the CLO/CCO, who in turn will report to the Audit Committee of the Company's Board of Directors, as appropriate or as requested by the Audit Committee Chair and in any event not less than on a quarterly basis.

3.4 Investigation Report. Upon completion of the investigation of any report of suspected misconduct under this Policy, the investigative team will provide its report to the Chief Compliance Officer and the Audit Committee of the Company's Board of Directors. The report will include the investigative teams' findings of fact and conclusions, including



information as to the root cause of the misconduct, if any, recommended corrective actions, as required, including, where appropriate, recommended disciplinary action. Depending on the nature of the suspected misconduct and the findings of the investigative team, the Chief Compliance Officer and the Chair of the Audit Committee will determine if notification of the misconduct to government agencies, including law enforcement agencies, is necessary or appropriate.

3.5 Close Out Report to Reporter. Upon conclusion of the investigation, the Chief Compliance Office will make a reasonable effort to provide a close out report to the Mirion employee or other stakeholder reporting the suspected misconduct. The Company's ability to provide such a close out report may, however, be restricted or prohibited by applicable law, including, but not limited to, confidentiality requirements, data privacy legislation, the requirements of law enforcement authorities, third party commitments and attorney-client privilege considerations.

3.6 Investigation Records. The Company will maintain complete records of each investigation undertaken under this Policy, including any findings of actual unlawful or unethical conduct, the root cause of that misconduct, and the corrective actions taken. Records of each investigation will be maintained in accordance with the Company's local records retention and disposal procedures. The Audit Committee of the Company's Board of Directors will have full access to the records of all investigations undertaken under this Policy, and the Audit Committee or the Chief Compliance Officer may, from time to time, direct an analysis of records of investigations, in order to determine: (i) if the misconduct identified, if any, is systemic in nature, or an isolated incident; (ii) if the root cause of the misconduct has been identified and addressed; and (iii) if all corrective measures recommended and approved by the Audit Committee or the Chief Compliance Officer have been adopted and fully implemented.

For additional information on specific requirements and prohibitions on internal investigations, see also Mirion's Internal Investigations Policy (CGX-PO-A89).

4. Violations and Disciplinary Action

Any Mirion officer, director, manager, employee or other stakeholder that engages in conduct contrary to this Policy and/or Mirion's ethical standards and principles, as set forth in the Code of Conduct and Ethics, will be subject to disciplinary action, carried out in accordance with Mirion Human Resources policies and applicable labor and employment laws, including, in appropriate circumstances, termination, upon a finding of:

- Violation of law
- Retaliation
- Failure to cooperate with any investigation undertaken under this Policy
- Providing by false or misleading information to an investigative team conducting an investigation into suspected misconduct hereunder
- Bad faith reporting for malicious or improper purposes