

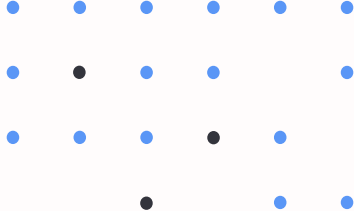


# The whistleblowing procedure



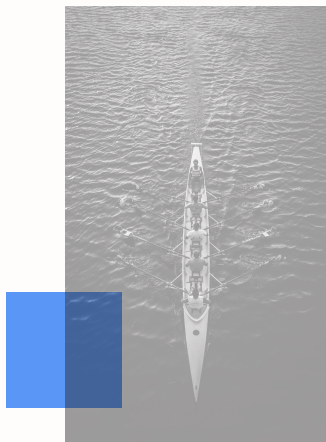
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## PURPOSE AND SCOPE

The Apave Group, of which Q Techna is a part, has established a procedure for receiving disclosures, conduct and situations that violate the Code of Ethics and Anti-Corruption. Q Techna, alongside the procedures adopted, also follows the conditions for the protection of persons defined by the Reporting Persons Protection Act (ZZPri) and, in this respect, the reporting of information on misconduct in the work environment.

The procedure has been specifically chosen as a means to expose such acts, practices and situations, to apply the necessary sanctions and to ensure that such breaches are not repeated. The system has been established in accordance with the rules relating to the protection of whistleblowing - the protection of the whistleblower, also defined in this Act as "whistleblowing" (defined below), for the benefit of those who wish to use the system and who are protected by the system.

This procedure applies to persons protected under the legal status of whistleblower as defined below (in the case of a serious breach of the law) and to all employees and related third parties who wish to disclose breaches of the Code of Ethics and Anti-Corruption Code.



# PROCEDURE FOR DISCLOSING SERIOUS BREACHES OF THE LAW OR BREACHES OF THE CODE OF ETHICS AND ANTI- CORRUPTION CODE

As a general rule, all such disclosures will be treated in accordance with Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of whistleblowers, the Reporting Persons Protection Act (ZZPri), the Single Authorisation for the processing of personal data, which is part of the "AU-004 professional alert" mechanisms of the French Data Protection Agency (CNIL), and the by-laws of the Republic of Slovenia. Anyone who abuses this system may be subject to disciplinary and judicial liability. No disciplinary action will be taken against anyone who uses this system in good faith, even if the facts are later found to be inaccurate or do not lead to further action.

Apave's Audit and Compliance Committee (hereinafter the Committee), chaired by an independent person, is responsible for handling such disclosures. The Committee will carefully process and record only objective information that is strictly necessary and directly relevant to the investigation of the disclosure. The retention of information obtained in the context of an investigation shall be governed in accordance with applicable laws and regulations.



## Your Protection As A Whistleblower


With the entry into force of the French Anti-Corruption Law of 9 December 2016, the whistleblower is protected by the introduction of a procedure for receiving disclosures from employees or related third parties. Likewise, with the entry into force of the Slovenian Reporting Persons Protection Act (ZZPri) of 27 January 2023, the whistleblower is protected when a whistleblowing procedure is initiated.

A disclosure initiated by a person who qualifies as a whistleblower and wishes to remain anonymous may be investigated if the seriousness of the facts alleged is established and the factual elements are sufficiently detailed.

Special precautions, such as a prior review, should be taken when dealing with such a disclosure. Any whistleblower who discloses his/her identity is guaranteed confidentiality.

Under the Reporting Persons Protection Act (ZZPri), a whistleblower is a natural person who reports or publicly discloses information about wrongdoing obtained in his or her work environment, and Q Techna accepts the definition of a whistleblower with a combination of six characteristics as defined by the French Anti-Corruption Commission (AFA):

- the whistleblower is a natural person: a legal person (e.g. an association, professional body, etc.) cannot be considered a whistleblower and is not covered by the provisions of the Law of 9 December 2016;
- the whistleblower has personal knowledge of the matters disclosed: the whistleblower does not report on someone else's findings, but on his/her own findings which could reasonably be suspected of being corrupt. Disclosures by proxy are therefore excluded;
- the whistleblower is impartial: there will be no benefit or reward for disclosure. The support (e.g. from a trade union) that a whistleblower might seek if he or she feels threatened does not undermine the impartiality of his or her actions;

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- the whistleblower acts in good faith: at the time the whistleblower discloses the facts, they must have the appearance of corruption, so that the whistleblower cannot later be accused of having intended to harm others.
  - a person who states facts that he knows to be false cannot be considered to be acting "in good faith" and be liable to prosecution for perjury under Article 283 of the Slovenian Criminal Code or Article 226-10 of the French Criminal Code, if he would have committed the offense in the territory of the Republic of France or if French law would have applied.
  - the matters disclosed are serious: this applies to all corruption offenses relating to the AFA's jurisdiction.

The protection afforded to whistleblowers is as follows:

- no criminal liability for whistleblowers who meet the criteria set out in the Whistleblower Protection Act or Law 2016-1691 of 9 December 2016, provided that the disclosure is "necessary and proportionate for the protection of the interests at stake and that the disclosure complies with the disclosure procedures".
- whistleblowers employed in the private sector or serving as public, civil, or military personnel cannot be dismissed, penalized, or in any way discriminated against for disclosure in accordance with the procedure defined in the legislation of the Republic of Slovenia or the Republic of France, as the case may be.



# Q Techna's Whistleblowing Procedure

Q Techna is committed to ethical and responsible business conduct.

As part of the Apave Group, Q Techna has put in place a procedure for receiving disclosures of any unethical conduct, which is available to all employees within the Apave Group or related third parties, and enables them to disclose any unethical conduct, including corruption, fraud, discrimination, and any other form of competitively harmful conduct, by an employee of the Apave Group or anyone else associated with the Group.

## How the disclosure mechanism works

### DISCLOSURE

The disclosure may be initiated by an employee or a third party associated with the Apave Group.

The subject of the disclosure may be any criminal offense or misdemeanor, serious violation of the law, or violation of an ethics or anti-corruption code.

#### **Any disclosure must be made in good faith.**


You may be liable to disciplinary or criminal action for any disclosure made in bad faith.

If you have personal knowledge of a fact or practice that you believe should be disclosed, please contact Apave's Disclosure Department, which acts as a fiduciary for the purposes of the Reporting Persons Protection Act (ZZPri), to investigate and deal with the report of wrongdoing, by any of the following means:

**E-mail: [apave@ethicattitude.com](mailto:apave@ethicattitude.com)**

**Telephone: +33788119006 (SMS, WhatsApp, Viber)**

**Communication in Slovenian is possible through all channels.**



**The Disclosure Service is under a strict obligation to respect the confidentiality of your identity, the facts disclosed and the persons named in the disclosure, except in relation to the Committee, which is responsible for investigating disclosures.**

You can remain anonymous if you feel that disclosing your identity could put you at serious risk. Disclosure by a person who wishes to remain anonymous may be investigated if the seriousness of the matters stated is confirmed and if the factual elements are sufficiently detailed. However, if possible, it is recommended that you disclose your identity to a contact person in the Disclosure Service who is a trusted third party.

## **INVESTIGATION FOLLOWING DISCLOSURE**

Regardless of the means of communication you choose, you will receive an automatic acknowledgment of receipt of your disclosure. The Disclosure Receiving Service will process disclosures received within 24 hours. If necessary, the Service will contact you via the means of communication you specify to supplement your disclosure with additional questions to ensure full clarity and understanding of the matters or conduct disclosed.

The information thus collected is forwarded through the Disclosure Receiving Service to the Committee, which is chaired by an independent person who will examine the facts disclosed and, if necessary, make recommendations to the Group's management.

## **RIGHT TO RECTIFICATION**

You have the right to access, correct, or amend the information you have provided during the procedure, using the same means of communication as for disclosure, to report on the matter, and/or to provide additional information or documents, regardless of the form or medium used to justify the disclosure.



## DESTRUCTION OF INFORMATION

If, after the necessary checks have been carried out, no further action is taken in relation to your disclosure, any parts of the file that could identify you or the persons named will be destroyed by the Disclosure Receiving Service within two months.

You will be informed that the case is closed.

The Disclosure Service is subject to automatic processing of the disclosed data, which is carried out under the authorization of the French Data Protection Agency (CNIL) in accordance with the applicable provisions of French law and the Slovenian Reporting Persons Protection Act (ZZPri) and the Personal Data Protection Act (ZVOP-2).



The whistleblowing procedure was approved by:  
Andrej Lešnjak PhD  
General Manager