Code of Ethics

March 2025

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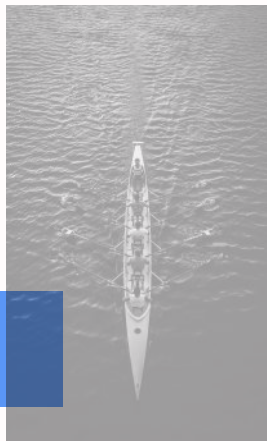

PURPOSE AND SCOPE

The prevention of corruption and influence peddling is a one of the fundamental concerns in Q Techna's objective of limiting the risks associated with ethical misconduct. Q Techna is committed to complying with the laws and regulations applicable in the territories in which we conduct our activities, as well as any changes in these laws and regulations.

Certain legislation has extraterritorial application, enabling the relevant authorities to pursue acts of corruption or influence peddling outside their borders. This is notably the case in the United States ("Foreign Corrupt Practices Act"), the United Kingdom ("United Kingdom Bribery Act") and France ("Sapin II" law).

As well as complying with applicable regulations, Q Techna is also committed to the defense and promotion of a transversal ethical culture within the company and among its partners, through the publication of a code of ethics, an anti-corruption code and a whistleblower procedure.

The purpose of the Code of Ethics is to promote the development of business ethics and etiquette in interpersonal relationships, to establish understandable standards of behaviour, to inspire and support employees in their actions, and to draw a clear line between good and bad practices, actions, and behaviours.

DESCRIPTION OF THE PROCEDURE

Q Techna is committed to the following values:

INTEGRITY AND INDEPENDENCE
Without exception, we are always open and honest with our customers, partners, and employees, no matter who they are, where they come from, or what their background is.

AUTHORITY AND RESPONSIBILITY
The services we offer are fully tailored to the contracts we enter into with our clients, based on the proven expertise of our employees and respect for confidentiality. This is the basis for the reputation we have built and the trust we have earned.

RESPECT FOR THE LAW AND FOR INDIVIDUALS
We fully comply with the laws and regulations that apply wherever we do business. We do this by being respectful of others, transparent, tolerant, willing to listen, and by delivering on our commitments.

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY
In all our actions, we are committed to respecting human dignity, social rules and the environment.

Ethical And Operational Rules

In our work, whether commercial, technical, administrative, or otherwise, we must ensure that we meet the criteria of independence, impartiality, integrity, and confidentiality that are central to building trusted relationships with our customers, suppliers, and partners. This obligation applies to all employees, but especially at the manager level, who must integrate these criteria into their day-to-day management practices.

FOLLOWING THESE RULES WILL HELP US TO:

- Managing risks related to conflicts of interest.
- Promoting conditions for fair competition with both our suppliers and our customers.
- Ensuring that the findings, reports, etc., that come to light in the course of our work are not subject to any commercial, financial, or other pressure from outside individuals or organizations.
- Maintaining strict independence from the influence of clients, suppliers, subcontractors, users, etc.
- Ensuring the confidentiality of the information to which we have access, and in particular respect for intellectual property rights.
- Fostering a spirit of cooperation and consultation, which is essential for the smooth running of the company, especially in the interests of our customers and partners.
- To ensure compliance with this Code of Ethics: any employee may report any violation or deficiency of which he or she is aware within time frames that allow for an effective response and may encourage that this information be verified.

ALL EMPLOYEES OF THE COMPANY, WHOEVER THEY ARE AND WHATEVER THEIR CIRCUMSTANCES, HAVE A DUTY TO:

Promote fair competition by:

- not engaging in any relationship with our competitors that requires "quid pro quo" in relation to specific offers, prices, market sharing, business or geographic sectors, except in cases where this practice is lawful.
- not obtaining information about our competitors in an illegal or unfair way, and not spreading false information about them in order to defame them.
- not exerting any pressure on anyone that might compromise their integrity.
- not participating or involving Q Techna in activities that are incompatible with their freedom of opinion and integrity.
- not getting involved, personally or in direct connection with the supervision, as a collaborator or for remuneration, in any activity as a planner, performer, supplier or user of the matter under supervision.
- refusing to carry out any inspection incompatible with their impartiality.
- reporting any conflicts of interest arising from their personal relationships.
- avoiding any favouritism in relation to a particular manufacturer, supplier or service provider, in particular in the context of the services we provide to our customers in the course of our business.
- treating all customers without discrimination, regardless of their organisation or the size of their business with the Group.
- not exerting pressure on another employee of the company who is responsible for the provision of the service in a way that could affect their impartiality, in particular because of personal interests in the matter of the service.
- refraining from disclosing any findings, results, documents or information obtained from clients to an external party outside the company without their formal consent, unless requested to do so by a competent authority or a court of law.

- not answering questions from the press or giving interviews in the course of their profession, unless expressly authorised to do so by the company's management. establishing the identity of the contact, in particular on the spot or by telephone, before disclosing to him any results or information about Numip for which the Company may be held liable and promptly confirm in writing those points for which the Company may be held legally liable.

- in the event of any conflict situation while working at a client's, partner's or other's site (e.g. aggressiveness, derogatory remarks, business or physical threats, etc.), avoiding making statements that could exacerbate the situation, point out the Company's objectives and immediately report the incident to the Company's management.

- not entrusting third parties who are not employees of the company:
  - its equipment, online and documentary resources, except in the context of a contractual agreement,
  - your safety and personal protective equipment, except in the event of force majeure.

Encourage respectful working relations within the company:

- rejecting all forms of racism and any form of discrimination based on gender, ethnicity, opinion or any other social or leisure group.

- evaluating and treating their subordinates solely on the basis of their competence, behaviour and achievements.

- categorically prohibiting harassment or bullying of any kind.

- rejecting any violation of human dignity, including slavery, forced labour, trafficking in human beings, and in particular the exploitation of children, by individuals or organisations.

Implementation Of The Code And Action To Be Taken When Irregularities Are Detected

The Apave Group, of which Q Techna is a part, senior management has set up an Audit & Compliance Committee (hereinafter the Committee) chaired by an independent figure chosen by the Group's Chairman. The role of the committee is to oversee the proper implementation of the Code of Ethics throughout the Group by means of evaluations and audits, relying on an internal network of ethics correspondents.

The Chief Executive Officer is responsible for the effectiveness of the missions given to the Committee.

The Apave Group has also put in place a procedure for collecting reports or complaints about potential breaches of the Code of Ethics.

These reports will be processed by the Committee by the procedures set out in a common procedure for reporting breaches of the Code of Ethics and the Anti-Corruption Code (The whistleblowing procedure).

The conduct principles set out in this code apply to all Numip employees. Failure to comply with the Code's rules will be considered as a breach and may be sanctioned, in accordance with the regulations, as follows:

FOR EMPLOYEES:

- reminder;
- public reprimand;
- withdrawal of ratings or a fine;
- written warning before cancellation;
- ordinary dismissal for unfair dismissal;
- extraordinary dismissal.

FOR EXTERNAL COLLABORATORS:
o termination of existing cooperation agreements.

Certain principles set out in this Code are subject to specific procedures, which staff members must familiarise themselves with when it comes to their duties.

In the event of any doubt or uncertainty as to the application of the above principles, the employee should contact his/her manager who may inform the Committee. In the event that referral to a manager may prove sensitive, the staff member should inform the Committee directly.

This Code of Ethics was approved by:
Andrej Lešnjak PhD
General Manager

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