The whistleblowing procedure

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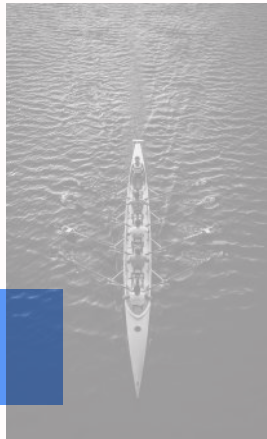

PURPOSE AND SCOPE

The prevention of corruption and influence peddling is a fundamental issue in Q Techna's objective of limiting the risks associated with breaches of probity. Q Techna undertakes to comply with the laws and regulations applicable in the territories in which it conducts its activities, as well as any changes in these laws and regulations.

Certain legislation has extraterritorial application, enabling the competent 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 Apave Group, of which Q Techna is a part, has established a procedure for receiving disclosures of actions, 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 Whistleblower Protection Act 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.

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

Apave ensures the confidentiality of reports at every step of the handling process. As a general rule, all such disclosures will be dealt with in accordance with of the GDPR, 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), and applicable legislation of the Republic of Slovenia.

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.
Anyone who abuses this system may be subject to disciplinary and judicial liability.

Apave's Audit and Compliance Committee, chaired by an independent person, is responsible for handling such disclosures. To this end, it has an email address independent from the Apave Group, hosted by a trusted third party to ensure the confidentiality of exchanges (compliance.1-apave@ethicattitude.com). 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 the collection by employees or related third parties of reports or complaints. Likewise, with the entry into force of the Slovenian Reporting Persons Protection Act 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.

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, a whistleblower is a natural person who reports or publicly discloses information about wrongdoing obtained in his or her work environment, and Numip accepts the definition of a whistleblower with a combination of the following characteristics:

- 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 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 facts reported may concern information on a crime, an offence, a threat or harm to the general interest, a violation or an attempt to conceal a violation of an international commitment duly ratified or approved by Slovenia or France, of a unilateral act of an international organisation taken on the basis of such a commitment, of European Union law, or of a law or regulation.

Only information that is unlawful or harmful to the public interest may be the subject of an alert or disclosure. Mere malfunctions in a public or private entity are not grounds for an alert.

The protection afforded to whistleblowers is as follows:

- no criminal liability for whistleblowers who meet the criteria set out in the applicable law, 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

As part of the Apave Group, Q Techna is committed to ethical and responsible business conduct.
The Apave Group has in place a procedure for receiving disclosures of any unethical conduct, which is available to all employees within the Group or related third parties, and enables them to report any information. The facts reported may concern information on a crime, an offence, a threat or harm to the general interest, a violation or an attempt to conceal a violation of an international commitment duly ratified or approved by Slovenia or France, of a unilateral act of an international organisation taken on the basis of such a commitment, of European Union law, or of a law or regulation.

They may also concern facts such as corruption, fraud, discrimination or anticompetitive behaviour involving an employee of the Apave Group or any person linked to the Group.

The procedure for handling whistleblowing reports by the Apave Group does not exclude handling by another group entity depending on where it is based, its nationality, its activity or the whistleblower's place of residence, in accordance with applicable laws and regulations.

The service is made available via a secure platform managed by a trusted third party responsible for the receipt of disclosures that will then be dealt with by the Committee, in order to ensure independent and effective handling of such disclosures.

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 Whistleblower Protection Act, to investigate and deal with the report of wrongdoing, by any of the following means:

E-mail: 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. However, if possible, it is recommended that you reveal your identity to the contact person at the disclosure receipt service, which is a trusted third party or by the organism in charge of the receipt of your disclosure, the Committee, or to its Chairman.

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, in accordance with the applicable provisions of the Slovenian Whistleblower Protection Act, the Personal Data Protection Act, and other applicable data protection laws and regulations.

This procedure is applicable to those persons enjoying the protected legal status of whistleblower as defined above and to any employee or related third party wishing to disclose a breach of the Numip Code of Ethics and Anti-Corruption Code.

You are witness to matters that you believe are in breach of the Code of Ethics or of the Anti-Corruption Code, or you are aware of information that could be reported as an alert: where do you report these facts?

You can choose to report either internally (to a trusted third party) or externally (to an institution designated by the legislation in force).

GROUP DISCLOSURE RECEIPT SERVICE

E-MAIL ADDRESS:- APAVE@ETHICATTITUDE.COM

TELEPHONE: +33788119006
SMS, WHATSAPP, VIBER

You can submit a disclosure if:

- You are an Apave Group employee or related third party
- And if you have personally witnessed the matters to be disclosed or the information was obtained in the course of your professional activity

What matters should be disclosed?

If you are an employee:

- Any breach of the Group Code of Ethics and Anti-Corruption Code
- In the days following your disclosure, the disclosure receipt service (a platform managed by a trusted third party) may contact you, seeking answers to specific questions

If you are an employee or a third party:

- Acts likely to constitute a crime, an offence, a threat or harm to the general interest, a violation or an attempt to conceal a violation of an international commitment duly ratified or approved by Slovenia or France, of a unilateral act of an international organisation taken on the basis of such a commitment, of European Union law, or of a law or regulation.

In the days following your disclosure, the disclosure receipt service (a platform managed by a trusted third party) may contact you, seeking answers to specific questions.

Once the service has all the necessary information, it transfers the case to the Group Audit & Compliance Committee.

You will always be informed when the investigation is closed.

24H

YOU WILL RECEIVE AN AUTOMATIC CONFIRMATION OF RECEIPT OF YOUR DISCLOSURE

INVESTIGATION OF THE AUDIT & COMPLIANCE

COMPLIANCE.1-APAVE.@ETHICATTITUDE.COM

The disclosure receipt service is under a strict obligation of the **confidentiality**, except with respect to the Audit & Compliance Committee carrying out the investigation. It also ensures the integrity of the data you communicate.

Any disclosure must be made in good faith

Any disclosure made in bad faith could render you liable to disciplinary measures and/or legal action

You have the right to rectify the information disclosed

Throughout the procedure, you have the right to access the information you have provided and to rectify and supplement it, using the same means of communication as provided for disclosure.

The disclosure is forwarded to the Apave Group Audit & Compliance Committee

The Audit & Compliance Committee takes further action on your disclosure.

THE AUDIT & COM-PLIANCE COMMIT-TEE WILL RECOM-MEND THE APPRO-PRIATE NECESSARY MEASURES TO APAVEGROUP SENIOR MANAGEMENT.

THE COMMITTEE MAY FORWARD THE DISCLOSURE TO THE ADMINISTRATIVE, PROFESSIONAL OR JUDICIAL AUTHORI-TIES WHEN THIS IS PROVIDED FOR IN LAW.

The Audit & Compliance Committee takes no further action on your disclosure

WITHIN TWO MONTHS: DESTRUCTION OF THE INFORMATION TRANSMITTED, IN PARTICULAR THE IDENTITIES OF THE WHISTLEBLOWER AND THE SUBJECT OF THE ALERT.

You are protected as a whistleblower if:

- You are a Group employee or related third party; and
- If you are reporting crimes, offences or serious breaches of the law; and
- If you have personally witnessed the matters to be disclosed;
- If you disclose them in good faith and in a disinterested manner.

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