

# CODE OF ETHICS

JANUARY 2025



# APAVE RENEWS ITS COMMITMENT TO ITS FOUNDING VALUES

The prevention of corruption and influence peddling is a fundamental concern in the Apave Group's objective of limiting the risks associated with ethical misconduct. Each Apave Group entity 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 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, the Apave Group is also committed to the defense and promotion of a transversal ethical culture within the Group and among its partners, through the publication of a code of ethics, an anti-corruption code and a whistleblower procedure applicable to all Apave Group entities.

## INTEGRITY AND INDEPENDANCE

We are honest and fair in our conduct and actions, whether dealing with our customers and partners or our employees, without exception, whoever they may be and whatever their background and country of origin.

## COMPETENCE AND ACCOUNTABILITY

The services we offer are perfectly tailored to the contracts we enter into with our customers, founded on the proven knowhow of our staff, and on respect for confidentiality. They are the foundation for the reputation we have forged and the trust we have earned, both so vital to our role as a third party.

## RESPECT FOR THE LAW AND PEOPLE

We comply in full with the legislation and regulations in force wherever we operate, and we do so according to an overall and absolute principle of respect for others, transparency, tolerance, willingness to listen and living up to 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 all our work, whatever its nature, whether commercial, technical, administrative or other, we must be sure to meet the criteria of independence, impartiality, integrity and confidentiality that are central to the bonds of trust that link us to our customers, suppliers and partners. This obligation extends to all of us, and in particular to the various line managers, who must incorporate these criteria into their daily management practices.

## ABIDING BY THESE RULES WILL HELP US TO:

- Manage the risks associated with conflicts of interest.
- Promote the conditions for fair competition, as regards both our suppliers and our customers.
- Ensure that the findings, reports, etc. arrived at in the course of our assignments are
- not subject to any commercial, financial or other pressures emanating from external individuals or organisations.
- Maintain strict independence with regard to designers, suppliers, installers, users, etc.
- Guarantee the confidentiality of the information to which we have access and, in particular, respect for property rights.
- Encourage a spirit of teamwork and consultation, essential to the smooth running of the company, particularly in the interests of our customers and partners.
- Ensure compliance with this code of ethics: each of us can report any breach or failing that may come to our knowledge, within a time-frame that allows for an effective response, and can encourage the use of this information.

## ALL GROUP EMPLOYEES, WHOEVER THEY MAY BE AND WHATEVER THE CIRCUMSTANCES, ARE REQUIRED TO:

### ✔ Encourage fair competition

- By not engaging in any quid pro quo relationship with our competitors as regards specific offers, prices, sharing of markets, business or geographical sectors, except in cases where this practice is legal.
- By not seeking to obtain information on our competitors by illegal or unfair means, or to disseminate untruthful information regarding them for the purposes of denigration.
- By not placing any pressure on any individual that might influence their integrity.
- By not engaging personally, and not involving Apave, in an activity incompatible with their independence of opinion and their integrity.
- By not engaging, in a personal capacity and when directly associated with an inspection, as an associate or for consideration, in any activity as a designer, manufacturer, supplier, installer or user of the objects of the inspection.
- By refusing to carry out any inspection service incompatible with their impartiality.
- By reporting any conflict of interest arising from their personal relationships.
- By avoiding any favouritism with regard to a particular manufacturer, supplier or service provider, in particular as part of the services we provide to our customers.
- By treating all customers without discrimination regardless of their structure or volume of business transacted with the Group.
- By not bringing pressure to bear on another Group employee responsible for delivering a service, in such a way as to affect their impartiality, particularly as a result of personal interests in the object of the service.
- By refraining from disclosing to persons outside the company any findings, results, documents or information obtained from customers without their formal agreement, except when required to do so by a competent authority or court of law.
- By not giving interviews in their professional capacity or responding to questions from representatives of the media unless specifically authorised to do so by the senior management of the entity to which they belong.

- By ascertaining the identity of any contact, particularly on site or by telephone, before divulging any results or information for which the Apave organisation to which they belong may be held liable and by confirming rapidly in writing those points that could render us legally liable.
- In the event of any conflict situation, irrespective of its nature, during operations on the premises of a customer, lead, partner, etc. (aggression, disparaging remarks, commercial or physical threats, etc.), by avoiding making any statements that might aggravate the situation, by reminding our objectives and by reporting the situation to line management at the earliest opportunity.
- By not entrusting or lending to third parties not employed by the Group:
  - their equipment, IT and documentary resources, except under the terms of a contractual agreement.
  - their safety and personal protection equipment, except in the event of force majeure.

### ✔ Encourage respectful working relations within the company

- By rejecting racism of all kinds and any form of discrimination on the grounds of gender, nationality, opinions, or any union or non- professional commitments.
- By appraising and dealing with the employees under their responsibility solely on the basis of their professional skills, behaviour and results.
- By categorically forbidding harassment or intimidation in any form whatsoever.
- By rejecting any violation of human dignity including slavery, forced labour, people trafficking and, in particular, child exploitation, on the part of either individuals or organisations of any kind.

# IMPLEMENTATION AND DISCLOSURE MEASURES

The Apave Group senior management has set up an Audit & Compliance 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 Audit & Compliance Committee.

*Apave 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 Audit & Compliance Committee in accordance with the procedures set out in a common procedure for reporting breaches of the Code of Ethics and the Anti-Corruption Code.

The conduct principles set out in this code apply to all Group employees.

Failure to comply with the Code's rules will be considered as a breach and may be sanctioned, in accordance with the regulations of each country, as follows:

## FOR GROUP EMPLOYEES:

- reprimand,
- dismissal,
- transfer,
- demotion,
- termination for cause,
- termination for serious professional misconduct.

## FOR EXTERNAL COLLABORATORS:

- Termination of the contract(s) in force.

Certain principles set out in this code are subject to special procedures with which employees must familiarise themselves when their duties are concerned.

In the event of any doubt or uncertainty as to the application of the principles set out above, the employee should refer to their line manager, who may inform the Ethics Audit Committee; where referral to the line manager might prove a sensitive issue, the employee should bring the matter directly to the attention of the Audit & Compliance Committee.

## YOUR PERSONAL CONTACT

The Audit & Compliance Committee

✉ [compliance.1-apave@ethicattitude.com](mailto:compliance.1-apave@ethicattitude.com)

