

IMQ Certification (UK) Ltd.

Code of Ethics

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1. PURPOSE AND SCOPE

The following functions are attributed to this Code of Ethics:

- of legitimacy: the Code of Ethics sets out the duties and responsibilities of IMQ Certification (UK) (hereinafter IMQ UK) towards all those who come into contact with the Company and vice versa;
- cognitive: the Code of Ethics makes it possible to recognize unethical behaviours and to indicate the correct procedures for exercising the functions and powers attributed to each one;
- of incentive: the Code of Ethics contributes to the development of an ethical awareness and strengthens the reputation of IMQ UK and the relationship of trust with those who relate with IMQ UK itself.

The principles and provisions of this Code of Ethics are addressed to and shall be known by all company representatives, namely directors, auditors, liquidators, managers and employees of IMQ UK (hereinafter " Recipients"), and by part of all those who, for whatever reason, have relations with IMQ UK (by way of example, but not limited to, consultants, external collaborators - even occasional ones -, suppliers, customers, etc., hereinafter referred to as " Third Parties").

Therefore, the Code of Ethics is disseminated to all Recipients and made known to Third Parties: all those (Recipients and Third Parties) who have relations with IMQ UK, accept the provisions of this Code of Ethics and undertake to respect it.

All Recipients are obliged to:

- know and disclose the principles and values contained in this Code of Ethics by reporting any significant violations of the Code of Ethics to the Directors;
- operate according to the ethical-behavioural rules identified by the Code of Ethics both in the exercise of their duties and in relations with the outside world, refraining from conduct contrary to them.
- Third parties are obliged to respect the canons of legality, correctness, and good faith in compliance with the ethical-behavioural rules of this Code of Ethics.
- Each Third Party, upon conclusion or renewal of the contractual relationship with IMQ UK, declares to have read and accepted the Company's Code of Ethics, accessible to all through publication on the official website www.imquk.com.

2. APPROVAL AND UPDATING OF THE CODE OF ETHICS

This Code of Ethics is approved by the Board of Directors and is subject to review and update by the same.



For any clarification regarding the interpretation or application of the Code of Ethics, all Recipients are invited to contact the Management systems manager (e-mail address: info@imquk.com).

3. ETHICAL - CONDUCT PRINCIPLES

All the work activities of those who work for IMQ UK shall be carried out with professional commitment, moral rigor, and fairness, also in order to protect the Company image.

All Recipients and Third Parties are required, in carrying out their activities, to comply with the following ethical-behavioural principles:

- Legality, or compliance with the laws, regulations, provisions in force in the UK legal system and / or in force in the foreign countries where IMQ UK operates;
- Equality, or uniformity of treatment towards Recipients and Third Parties, regardless of differences in age, sex, race, language, religion, political opinions, and personal, economic, and social conditions;
- Honesty and Correctness, or respect for the principles of moral integrity, justice, and righteousness, refraining from carrying out reprehensible actions, or which, according to the common sense of conscience, conflict with honesty;
- Impartiality, that is a way of operating and judging objective and equanimous, without favouritism for any of the parties involved, whether public or private, linked with the Recipients or Third Parties by relationships of friendship or enmity, kinship, or affinity;
- Transparency, that is, full traceability and easy identification of each activity in all its steps, so that all relationships are understandable and the respective acts justifiable;
- Confidentiality, or scrupulous abstention from the disclosure of any corporate data (be it of a technical, logistical, strategic, economic) and personal nature, in compliance with current legislation on privacy;
- Diligence, or carrying out one's duties assiduously, precisely, attentively, and accurately.
- Promotion of gender equality , i.e., commitment to enhance and protect diversity and equal opportunities, as well as support female empowerment through the supervision of all phases of the person's professional career, the development of a coherent and responsible communication process and prevention of all forms of physical, verbal, digital abuse (harassment) in the workplace.

4. ETHICAL - CONDUCT RULES

4.1. ENHANCEMENT AND PROTECTION OF THE PERSON



IMQ UK undertakes to enhance the abilities and skills of the Recipients, making suitable tools for training, updating and professional growth available to them.

IMQ UK ensures that the Recipients' selection, management, and training processes are based on assessments of professionalism and merit, prohibiting any form of discrimination, direct or indirect, based on sex, language, race, religion, political opinions and personal and social conditions.

The Company guarantees:

- the payment of salaries in compliance with national or territorial collective agreements stipulated by the most representative trade union organizations at national level, and in any case proportionate with respect to the quantity and quality of the work performed;
- compliance with the regulations relating to working hours, rest periods, weekly rest periods, compulsory leave, holidays;
- the commitment to pursue gender equality, enhance and protect diversity and equal opportunities, as well as support female *empowerment* by overseeing all phases of the person's career path (selection and hiring, career management, salary equity, parenting and care, work-life balance), the development of a coherent and responsible communication process and the prevention of all forms of physical, verbal, digital abuse (harassment) in the workplace.

Any type of activity that may involve the exploitation or enslavement of any individual, as well as any form of exploitation of child labour is prohibited.

IMQ UK condemns the hiring and consequent use of workers from foreign countries with an invalid, revoked, cancelled, or expired residence permit.

All Recipients are therefore required to comply with local and international legislation as regards human rights, labour, and trade union law.

4.2. PROTECTION OF HEALTH AND SAFETY

IMQ UK guarantees the best possible health and safety conditions in the workplace to protect the safety of all Recipients as well as Third Parties who frequent the company premises, conducting its business in compliance with the national legislation in force in the sector, recognizing the principles of protection of the person and of health and safety in the workplace, a pre-eminent role in the pursuit of the *Company Mission*.

For this purpose, IMQ UK disseminates and promotes the culture of health and safety among the Recipients and Third Parties, as well as Visitors and contractors, through training and information sessions, defines roles and competences and issues internal procedures for which it demands compliance.

Recipients are required to comply with the rules and obligations regarding prevention and protection at work, setting themselves objectives of excellence that go beyond the mere fulfilment of the law, in full awareness of the value represented by the protection of health, safety and wellbeing conditions. of the person.

4.3. ENVIRONMENTAL PROTECTION

IMQ UK implements an eco-responsible philosophy aimed at guaranteeing the best possible conditions of protection and respect for the environment, conducting its business in compliance with the national environmental legislation in force, recognizing a role to the principles of protection of the person and the environment preeminent in the pursuit of the *Company Mission*.

IMQ UK promotes respect for the environment among Recipients and Third Parties, as well as Visitors and contractors, as a primary asset and common resource to be safeguarded for the benefit of the community and future generations with a view to sustainable development, preventing all forms of pollution (e.g. environmental, acoustic, water, etc.), evaluating the environmental impacts of each production process, limiting the environmental impact of its activities also through the use of means and technologies that do not damage the environment and its biodiversity, as well as defining roles and competences and by issuing internal procedures which it expects to be respected.

The culture of respect for the environment also passes through the appropriate training of the personnel concerned as regards the treatment of all kinds of waste (from differentiation to the treatment of pollutants) and through the constant monitoring of activities with an environmental impact.

Recipients are required to comply with the rules and obligations regarding environmental protection, separate waste collection and recycling of reusable material, setting themselves objectives of excellence that go beyond mere compliance with the law, in full awareness of the value represented by the protection of environment.

4.4. ANTI-CORRUPTION POLICY

IMQ UK maintains and manages relations with public and private entities in compliance with current legislation, the principles set out in this Code of Ethics and internal procedures.

Contacts with public and private subjects shall be kept with fairness and transparency to avoid any behaviour aimed, even if only potentially, at influencing their decisions.

Donations, gifts, benefits (both direct and indirect), gifts, acts of courtesy and hospitality aimed at influencing the choices of others or agreeing to that effect or even just to sensitize Third Parties, public or private, in a certain sense.

Only gifts, gratuities, benefits (both direct and indirect), gifts, acts of courtesy and hospitality of modest value made occasionally in the context of normal courtesy relations and in the context of local or international customs are allowed, provided they embrace the double requirement of tenuousness (i.e., modest symbolic value) and equality (i.e., cost parity in the choice of the gift). In any case, gifts, presents and similar items of a value higher than, as an indication, £50.00 cannot be made.

In any case, any donation made on a personal initiative or by drawing from social funds not previously used for this purpose is prohibited: only the Company has the power to allocate the related finances.

Likewise, it is forbidden for the Recipients to receive (or accept the promise of) gifts, gratuities, benefits (both direct and indirect), gifts, acts of courtesy and hospitality aimed at influencing their choices or even just to sensitize them in a certain sense. Exceptions are the so-called customary gifts - meaning with the binomial those gifts that practice requires to be exchanged when particular holidays such as, for example, Christmas - and, more generally, gifts of modest value; in any case, gifts, presents and similar items of a value higher than £50.00 cannot be received.

IMQ UK refrains from making any contribution, direct or indirect, in any form, to political parties, movements, committees and political and trade union organizations, their representatives and candidates, except for what is admitted and envisaged by the laws and regulations in force. Sponsorships of events, exhibitions, *meetings*, and similar initiatives may be carried out only if they comply with the law and the principles of loyalty, correctness, transparency, and verifiability, as well as the internal procedures adopted by the Company.

IMQ UK can recognize contributions and donations in favour of subjects with social, moral, scientific, and cultural purposes, refraining if possible personal or corporate conflicts of interest are identified.

4.5. POLICY FOR THE FIGHT AGAINST ORGANIZED CRIMINALITY

IMQ UK strongly condemns any form of organized crime.

IMQ UK undertakes to verify the integrity and reliability requirements of commercial counterparties (suppliers, consultants, contractors, etc.) and customers.

In any case, no commercial relationship will be undertaken or continued, with commercial counterparties whose membership or contiguity with criminal organizations is even suspected, or who are suspected of facilitating in any form, even occasional, the activity of criminal organizations.

4.6. SAFEGUARDING OF IMPARTIALITY

IMQ UK is aware that impartiality represents one of the fundamental principles that shall be guaranteed by a Conformity Assessment Body, to develop an objective and fair action, without favouritism for any of the parties involved, whether public or private.

To this end, IMQ UK undertakes to comply with all the impartiality requirements defined by current legislation, as well as by Regulations or accreditation requirements applicable to conformity assessment activities.

In particular, the Company undertakes that all the assessment activities carried out are based on the principles of impartiality, independence, and objectivity and that the decisions taken are based on objective evidence of compliance (or non-compliance) and are not influenced by other interests or by other parties involved.

IMQ UK also undertakes to make public its impartiality policy and related specific objectives, including the commitment to:

- identify, analyse, evaluate, treat, monitor, and continuously document the risks to impartiality and proceed with their elimination or mitigation;
- have a mechanism for safeguarding impartiality, in which balanced representation of the significantly affected parties is guaranteed, without the prevalence of individual interests.

4.7. CONFLICT OF INTEREST

All Recipients and those working for IMQ UK shall refrain from any activity that could oppose a personal or third-party interest to those of the Company or that could interfere and hinder the ability to make, impartially and objectively, decisions in the IMQ UK's interest.

No Recipient may carry out activities in favour of competition, assume the qualification of consultant, member of the Board of Directors or of the Auditors of a competing company or perform their professional activity in favour of competition, unless expressly authorized by the Company itself.

No Recipient may exploit their position to achieve interests that conflict with those of IMQ UK or use - for their own benefit or that of Third Parties - information acquired in carrying out their work in contrast with the interests of IMQ UK.

Furthermore, no Recipient may use company assets at work or in their free time or provide services offered by the Company, without being previously authorized by the competent company function or by the hierarchical Manager; no one may carry out, during their working hours, other activities that are not congruent with their duties or organizational responsibilities, nor use company assets other than the aforementioned tasks.

4.8. DATA PROTECTION

Personal data means any information that identifies or makes identifiable, directly, or indirectly, a natural person or other information relating to his characteristics, habits, lifestyle, personal relationships, state of health, economic situation, etc.



IMQ UK protects the personal data of all Recipients and all those who come into contact with it, avoiding any improper use of such information and respecting the regulatory provisions on privacy (UK General Data Protection Regulation - UK GDPR - Data Protection Act 2018) and those required by internal company procedures.

IMQ UK informs the interested parties about the purposes and methods of the processing, ensuring that the same takes place only for the purposes - determined, explicit and legitimate - indicated in full compliance with the criteria of lawfulness and correctness of the processing.

Therefore:

- in compliance with the principle of relevance and non-excess of the data processed, IMQ UK guarantees the collection of data strictly necessary for the stated purpose ("data minimization");

- in compliance with the principle of confidentiality and data security, the Company implements adequate technical and organizational measures to guarantee a level of security appropriate to the risk.

In any case, the data of which IMQ UK becomes aware are kept only for the period of time strictly necessary for the purposes for which they were collected and / or subsequently processed and are kept by means of specific security measures suitable to minimize the risk of destruction, loss, unauthorized access, and treatment that is not permitted or does not comply with the purposes of the collection.

In particular, the personal data being processed are kept and controlled, also in relation to the knowledge acquired based on technical progress, the nature of the data and the specific characteristics of the processing, in order to minimize the risks of destruction or loss (even accidental) of the data itself, of unauthorized access or processing that is not permitted or does not comply with the purposes of the collection.

4.9. INTERNAL RELATIONS

All Recipients are required to cooperate fully with each other, to pursue the corporate Mission.

All Recipients are required to exercise the powers conferred on them in a balanced, fair, prudent, and non-discriminatory manner in compliance with their respective duties.

Top management shall not abuse their position and shall refrain from engaging in any vexatious and / or intimidating conduct towards employees.

Employees, for their part, are required to comply with the directives given to them by senior managers and to diligently execute them, provided that the orders themselves are not clearly in contrast with the laws in force and / or with the principles of this Code.

They shall also report any situations - which they might encounter - in contrast with the laws in force and / or with the principles of this Code.

4.10. RELATIONS WITH CUSTOMERS

IMQ UK's activity is oriented towards the satisfaction and protection of customers, both by ensuring a rapid response to any complaints, and by acknowledging all their suggestions, aimed at promoting an improvement in the quality of the commercial offer.

Approaching customers can only and exclusively take place through the advertising channels approved and promoted by IMQ UK. In particular:

- all ambiguous, incorrect, deceptive, or unfair practices, regardless of whether they violate specific laws and regulations, be they national or community or international;
- any form of customer hoarding that violates competition law and does not comply with the laws and regulations of the sector;
- any other surreptitious form of approaching customers that takes the form of illegal acts or acts contrary to the Code of Ethics, are forbidden.

Relations with customers shall be based on compliance with the principles of this Code of Ethics and all applicable laws and regulations.

4.11. RELATIONS WITH SUPPLIERS

The selection of suppliers shall take place according to the principles of this Code of Ethics and internal procedures, in compliance with the hierarchical structure and using the written form.

The selection of suppliers shall take place exclusively based on objective parameters such as quality, convenience, cost, capacity, efficiency, or locality.

4.12. INFRA-GROUP AND SERVICE RELATIONS

Intra-group relations mean all the factual and contractual relations between IMQ UK and the parent company IMQ Group S.r.l. and any of its subsidiaries and / or associates.

All intra-group relations shall be managed in full compliance with the national legislation on the subject, the regulations in force, as well as in compliance with the principles set out in this Code of Ethics.

On the issue date of this Code of Ethics, the Company benefits from a series of services by virtue of a specific service contract stipulated with IMQ Group S.r.l.

The management of the service relationships shall take place in compliance with the contractual provisions, the criteria imposed by the laws and regulations in force, as well as in compliance with the principles set out in this Code of Ethics.

In order to ensure compliance with the provisions of this Code of Ethics, it has been envisaged to insert a specific contractual clause in the service contracts with IMQ Group S.r.l. and in the various agreements between IMQ UK and the other companies of the IMQ GROUP, who have any commercial relations with the Company, in strict and punctual compliance with the principles contained in this Code of Ethics.

Relations between the companies shall be based on the principles of transparency and fairness, cohesion, and opportunity.

IMQ UK and IMQ Group:

- exchange the information necessary for the implementation of the GROUP's strategies;
- comply with the GROUP's strategy in terms of intra-company and extra-corporate relations, conforming to the GROUP's behavioural standards.

4.13. RELATIONS WITH PUBLIC INSTITUTIONS (P.I.)

The relationships that IMQ UK maintains with public officials or with persons in charge of a public service or of legislative bodies, European institutions, international organizations, with Accreditation bodies, with the Ministries, with the UK, European and international Standardization Committees and Organizations, with the Judiciary, with the Public Supervisory Authorities and with other independent Authorities, as well as with private partners concessionaires of a public service, shall be undertaken and managed in the absolute and rigorous compliance with the laws and regulations in force, the principles set out in this Code of Ethics and the internal procedures and protocols.

In particular, the Recipients are required to cooperate with the aforementioned Authorities actively and fully, avoiding any behaviour aimed at hindering the exercise of public functions or omitting the necessary communications.

With reference to operations relating to tenders, contracts, authorizations, licenses, concessions, requests and / or management and use of public funding (regional, national and / or community), management of orders, relations with supervisory authorities or other independent authorities, social security institutions, bodies responsible for the collection of taxes, bodies for bankruptcy, civil, criminal or administrative procedures and the like, any contact with third parties shall take place by the corporate bodies and subjects expressly delegated to do so, in line with corporate strategies and in writing. The subjects delegated to carry out the operations listed above shall report to the delegating subject in accordance with the law or the internal organizational procedures.

Except as specified below, donations, gratuities, benefits (both direct and indirect), gifts, acts of courtesy and hospitality aimed at influencing the choices of the P.I. (and comparable subjects mentioned above) or even just to sensitize the members, are prohibited.

It is agreed that the so-called free gifts do not fall under this prohibition - meaning with the combination those gifts that the practice requires to be exchanged on the occasion of particular holidays such as, for example, Christmas - and, more generally, gifts of modest value; in any case, gifts, presents and similar items of a value higher than £50.00, as an indication, cannot be made.

In any case, any gift made on a personal initiative or by drawing from own or social funds but not previously used for this purpose is prohibited: only the Company has the power to decide the corporate policy on the subject of gifts and allocate the related finances; it follows an essential duty of documentation of the expenses made and transparent reporting of the same.

4.14. DONATIONS, CHARITIES, AND SPONSORSHIPS

IMQ UK can recognize donations, contributions, and donations without compensation in favour of subjects with social, moral, scientific, and cultural purposes, in compliance with the system of thresholds, authorizations and technical checks provided for by the company procedures, refraining if they are deemed possible conflicts of interest, be they personal or corporate.

In order to avoid possible conflicts of interest and ensure standard conduct, these contributions shall be adequately documented in a truthful and transparent way, as well as the purpose, the recipient, and the feedback on the actual receipt of the charity itself.

IMQ UK refrains from making any contribution, direct or indirect, in any form, to political parties, movements, committees and political and trade union organizations, their representatives and candidates, except for what is admitted and envisaged by the laws and regulations in force. In particular, sponsorships of events, exhibitions, meetings, and similar initiatives may be carried out only if they comply with the law and the principles of loyalty, correctness, transparency, and verifiability, as well as the internal procedures adopted by the Company.

4.15. TRANSPARENCY OF DOCUMENTATION

IMQ UK undertakes to draw up and disseminate company documents in compliance with the principles of truthfulness, completeness, and transparency.

Any behaviour aimed at preventing or hindering the performance of all control or revision activities of company documentation is prohibited.

IMQ UK undertakes to keep the documentation relating to each operation carried out (corporate, accounting, etc.), to allow the operation to be reconstructed at any time and the identification of the subjects who authorized and performed it.

4.16. ANTI-MONEY LAUNDERING AND ACCOUNTING TRANSPARENCY

IMQ UK undertakes to respect and expects all Recipients to comply with the anti-money laundering legislation; in particular, any form of use of money, goods or benefits of illicit origin is prohibited.

All Recipients are required to verify information, including financial information, relating to commercial counterparties and suppliers, in order to ascertain their respectability and the legitimacy of their business before establishing business relationships with these, in order to avoid any implication in operations suitable, even potentially, to favour the laundering of money deriving from illegal or criminal activities.

All Recipients involved in accounting operations are required to make truthful and timely registrations. Each accounting operation shall be adequately recorded and documented in order to allow verification of the decision, authorization, and execution processes.

Any behaviour aimed at preventing or hindering the performance of all control or auditing activities is prohibited.

4.17. PROTECTION OF FREE COMPETITION

The Company recognizes fair competition as a fundamental element for its growth, for constant business improvement and for the protection of its reputation.

The Company expects compliance with the regulatory rules of the market, avoiding and prohibiting unfair practices such as to distort regular commercial competition.

IMQ UK ensures fair conduct based on good faith, censoring - by way of example and not limited to:

- boycott practices, underselling, transfer of employees, theft and use of others business secrets, unlawful interference with others' distribution systems, parasitic competition as well as any other agreement with competitors aimed at establishing or controlling prices or sales policies or to interfere in the free distribution of products;
- all ambiguous, incorrect, deceptive, or unfair practices, regardless of whether they violate the current legislation on the matter;
- any form of hoarding, approaching customers and concluding business in violation of sector regulations and this Code of Ethics.

4.18. PROTECTION OF INTELLECTUAL PROPERTY

All ideas, data, information generated by the Company, any patents, trademarks, and *copyrights* owned by IMQ UK are protected in compliance with current legislation.

All those who work in any capacity on behalf of IMQ UK are required to maintain the utmost confidentiality and secrecy and not to disclose or unduly request information on documents, knowhow, research projects, company operations and, in general, on all information learned, by reason of their job function.

On the other hand, the Company undertakes to respect (and bind the Recipients of this Code of Ethics in turn to respect) the intellectual property of all Third Parties that may have relations with it.

4.19. MANAGEMENT OF RELATIONS WITH THE MASS MEDIA AND CONFIDENTIAL INFORMATION

IMQ UK undertakes to ensure that communications to the outside take place in compliance with the principles of truth, correctness, and transparency.

The Company undertakes to manage relations with the press, the means of communication and information and, more generally, external interlocutors, in compliance with the internal operating procedures and identifying subjects authorized for this purpose.

Any request for news from the mass media received by IMQ UK personnel shall be communicated to the company / function expressly assigned to it, who will take care, where necessary, to disclose non-confidential information.

Any form of investment, direct or through intermediaries, which finds its source in confidential company news is strictly prohibited ⁽¹⁾.

¹⁾ Confidential or secret information constitutes those subject to specific laws or regulations (because they pertain, for example, to national security, military sectors, inventions, scientific discoveries, protected technologies, new industrial applications), as well as those contractually secreted relating, by way of example, technical information relating to products, plants or procedures, inventions, scientific discoveries, protected technologies and new industrial applications, marketing strategies and services. Furthermore, all information learned in carrying out the work activity whose dissemination and use could cause danger or damage to the company and / or undue gain to the employee or third parties are also reserved.

In any case, *insider trading* behaviours or the use of data, news or business opportunities learned in the exercise of the assignment or other behaviours that have as a consequence the depletion of company assets or are aimed at causing undue personal or third-party advantages, cannot be adopted.

The principles already expressed in the part dedicated to the conflict of interest and in the part dedicated to the protection of intellectual property are referred to as far as their competence is concerned.

5. VIOLATIONS OF THE CODE OF ETHICS AND REPORTS

The violation of the Code of Ethics constitutes a violation of the company provisions and, as such, entails the application of disciplinary sanctions against the transgressor.

By way of example and not limited to, the violation of the Code of Ethics may involve:

- individuals in top positions (Directors);
- employees and managers: application of sanctions provided for by the relevant legislation or even initiation of dismissal;
- for Third Parties: termination of the contractual relationship for just cause, exercise of the action for damages.

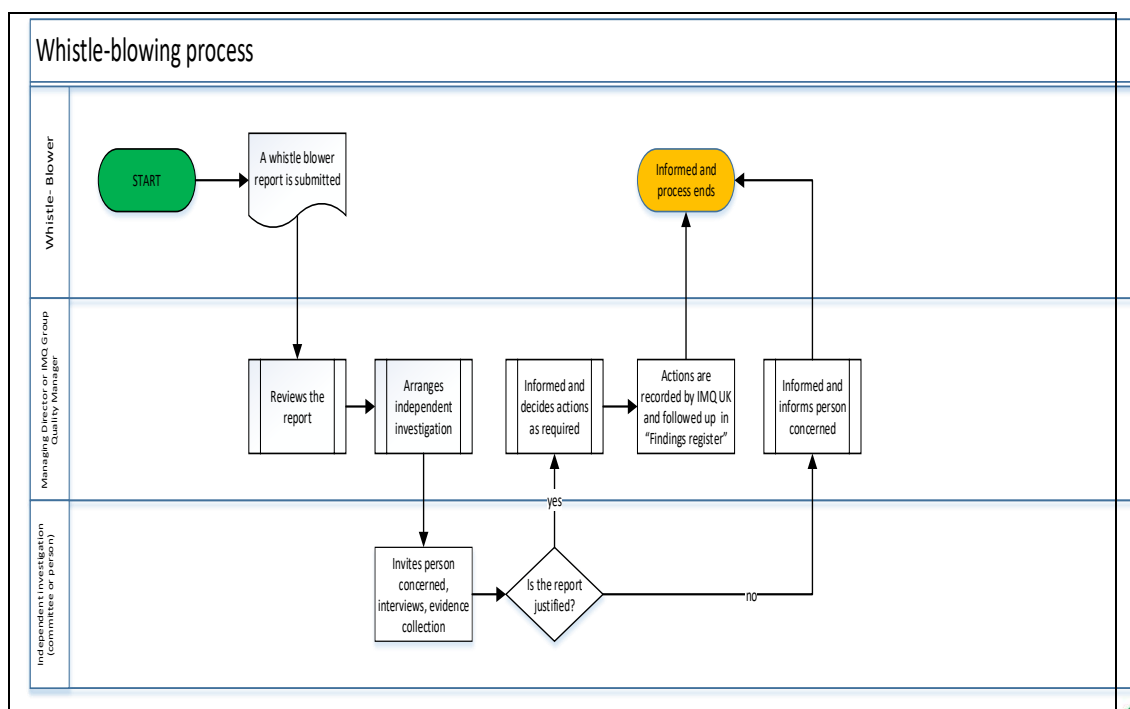
IMQ UK ensures all Recipients the availability of communication channels to report any violations of the Code of Ethics.

In this regard, IMQ UK encourages a reporting system (*whistleblowing*) that can be used whenever a risk is identified that could damage customers, employees, shareholders, the public or the Company's reputation. This reporting system guarantees the confidentiality of the identity of the whistle-blower in the management of the report by prohibiting retaliation or discriminatory acts, direct or indirect, against the whistle-blower for reasons connected, directly or indirectly, to the report. The system also provides for sanctions against those who violate the protection measures of the whistle-blower, as well as those who make reports with wilful misconduct or gross negligence that turn out to be unfounded.

The system includes:

- the reporting of related issues to IMQ UK Managing Director or in case the issues are related directly to the IMQ UK Managing Director, to IMQ Group Quality Manager;
- the initiation of an investigation by IMQ UK independent function or the assignment of the investigation to IMQ Group;
- the notification and adequate representation of the person(s) under investigation;
- the protection of the whistle-blower anonymity (during and after the process);
- the prohibition of any actions against the whistle-blower, for reasons connected to the specific subject or report;
- sanctions for those who repeatedly make reports with wilful misconduct or gross negligence, that turn out to be unfounded.

5.1. WHISTLEBLOWING PROCESS



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