

2025

APGAR.

Data for good reasons.

Ethics Charter

Message from the *founders*

Since its foundation in 2013, APGAR has been built on four fundamental values that define our culture: Commitment, Excellence, Partnership, and Ethics.

We, collectively and individually, defend these values. They form the basis of our code of conduct and are an integral part of the very essence of APGAR, shaping our daily actions and long-term strategy.

Our values are essential for affirming and recognizing APGAR as a responsible company, an expert in its field, and a model employer.

Our company operates in different countries worldwide, but we are one united team in our values. We firmly believe in diversity, inclusion, and equal opportunities. Every employee embodies and lives by these principles.

Jean-Yves FALQUE and Alaa HOBLOS



Jean-Yves FALQUE
Executive Chairman



Alaa HOBLOS
CEO

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Ethics for Good Reasons

Ethics Charter V2.0

Our Values, the foundation of our Ethics Charter

- **Commitment** for High-Quality Support
- Co-construction for a Sustainable **Partnership**
- Innovation in the service of **Excellence**
- **Ethics** for responsible behavior at all levels
 - Respect for People
 - Integrity in Business
 - Responsible use of Assets
 - Our Civic Responsibility

Our Values, the foundation of our Ethics Charter

Our **excellence**
Is recognized by

Gartner

We are certified
Great Place To Work®



With strong **values**



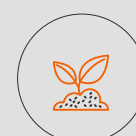
Commitment



Excellence



Partnership



Ethics

Chapter 1 – The Ethics Charter

What Does This Code of Ethics Entail?

APGAR has been founded on values that are part of its DNA.

Our Ethics Charter defines, explains, and formalizes the values, rules of conduct, behavior, and principles of action we expect from ourselves and that our relationships with our partners and service providers demand from us. It encourages each one of us to adopt an Ethical mindset and behavior in our daily professional activities.

Our Ethics Charter is a daily guide to help us understand what is expected of each member of the APGAR community and to identify issues that require special attention so that we can uphold our Ethics principles and commitments.

We actively seek and promote business partners who share our Ethics standards described in this Charter concerning human rights, working conditions, environmental protection, and business integrity. We are committed to supporting partners in adhering to these standards while having the courage, if necessary, to terminate relationships with those unwilling to comply.

The Ethics Charter applies to all APGAR employees. In the event of a violation, APGAR reserves the right to take appropriate measures according to the situation.

Who Is It Intended for?

Our Ethics Charter is for each and every one of us, including Directors, Managers, and Employees at all levels.

As an Employee, I must:

- Know and understand the Ethics Charter;
- Act by the Ethics Charter and seek advice from my Coach, Project Manager, or local HR Responsible in case of doubt.

As a Member of the Board, Manager, or Project Manager, I have additional responsibilities which require me to:

- Be able to advise and guide my team members on the issues they may raise;
- Lead by example, preserve, promote, and implement the Ethics Charter in all my daily actions;
- Ensure that members of my team adhere to the Ethics Charter;
- Identify risks related to situations of non-compliance and make the right decisions in cases falling within my area of responsibility.

Embracing Ethics in Daily Actions

To uphold the principles of our Ethics Charter and foster a culture of trust, APGAR has established a dedicated platform for raising alerts.

To uphold the principles of our Ethics Charter and foster a culture of trust, APGAR has established a dedicated platform for raising alerts. Each of us is encouraged to use this platform whenever we believe that a report is necessary.

APGAR is committed to addressing every report with utmost seriousness, impartiality, and respect for all concerned parties, in accordance with the internal procedure for reporting and managing alerts.

This procedure ensures the protection of whistleblowers against any form of retaliation, including any adverse or discriminatory measure taken against a whistleblower as a consequence of their report – whether such a measure is direct or indirect, explicit or disguised.

Document Review and Updates

Aware that this Ethics Charter is a living tool serving our values, APGAR is committed to regularly updating it so that it evolves in parallel with the company's growth, while remaining aligned with the requirements of its business activities, the expectations of its employees, and the values on which it is founded.

Each employee could contribute to this evolution by suggesting improvements or sharing reflections on ethical topics of their choice. The collection of proposals and facilitation of collective reflection are overseen by the local HR Responsible.

The final validation of any update lies with the Management, which ensures the Charter's consistency and compliance with our founding principles and commitments.

Chapter 2 – Respect for People

Diversity, Equality, and Inclusion

APGAR considers diversity as a fundamental characteristic. It is a profoundly multicultural organization that promotes creativity and innovation, while fostering an inclusive culture for the benefit of all.

This Ethics Charter aims to highlight our culture of diversity and integration, respecting individual differences such as origin, gender, sexual orientation, age, family situation, religious beliefs, trade union or mutual activities, political opinions, affiliation or non-affiliation, real or perceived, to an ethnicity, nation or community, surname, physical appearance, health status, and disability.

Everyone has the right to equal opportunities and fair treatment.

Harassment

We all should be treated with respect and courtesy, and we also have a duty to apply the same rules in our relationships with others.

This applies to respect in the workplace. APGAR is committed to creating a professional environment free from harassment, including all forms of intimidation, sexual advances, threats, or acts of violence, whether verbal or physical. In addition, APGAR adopts a zero-tolerance policy. No form of harassment, violence, or threatening behavior will be tolerated. It includes any attitude, situation, or behavior that can be classified as harassment. Failure to comply with these rules may result in disciplinary action in accordance with the applicable regulations, codes, or laws.

It is expected that no one makes remarks, jokes, or displays objects that could offend a person based on their social, cultural, ethnic, or national origins, religious beliefs or others, caste, gender, family situation, possible pregnancy, sexual orientation, disability, age, skin color, race, parental status, political ideology, or trade union activity if it can be classified as harassment.

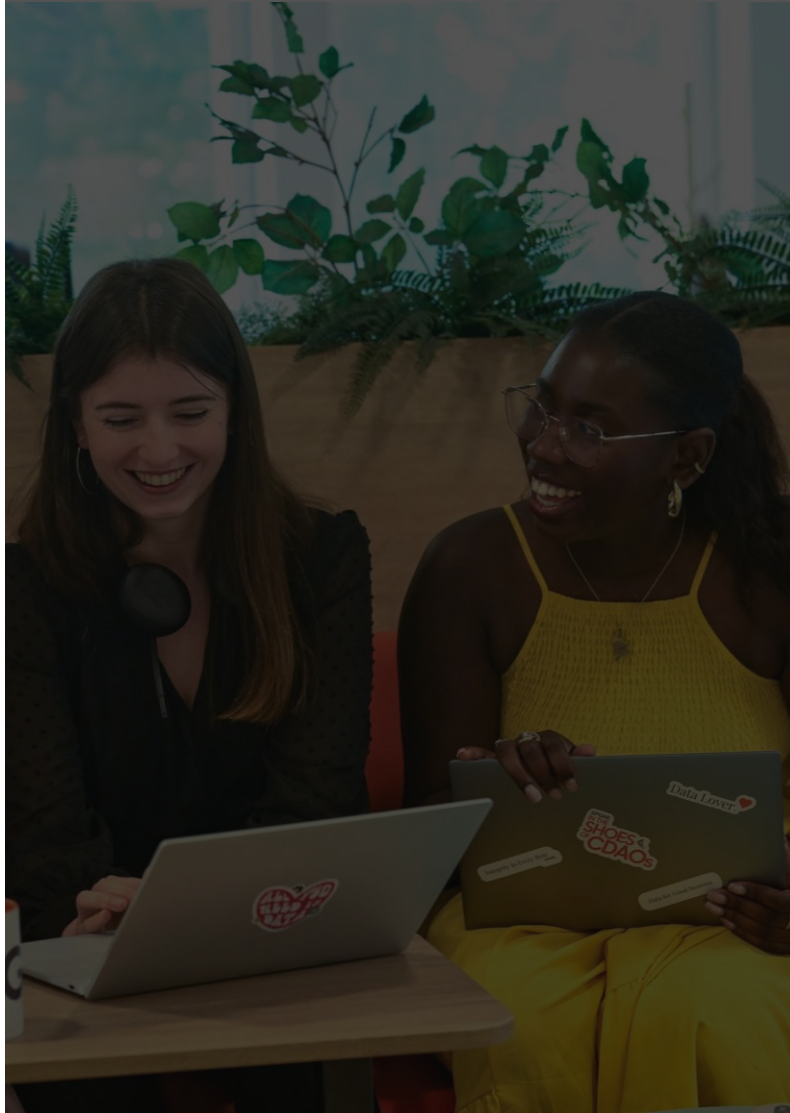
It is also essential that each of us refrain from any form of retaliation, revenge, or persecution against a person who claims to have been harassed. Such actions would be considered inappropriate behavior, or even harassment, and could therefore be subject to disciplinary action.

Behavior at Work and Work-Related Events

At professional events, we all are ambassadors of APGAR's image.

Our actions and behaviors in the course of our duties can have an impact on the company as well as on our professional reputation. It is essential to adhere to generally accepted rules of conduct in the workplace and on social media.

Respect for People.



We must also respect individual and cultural differences so that every team member can benefit from a pleasant work environment at professional events and in general. We must ensure that no feelings of exclusion, discrimination, or harassment occur.

During any professional event (exhibitions, forums, seminars, meetings), it is crucial that we exhibit professional, reasonable, and appropriate behavior without compromising the reputation of APGAR or our own.

We are expected to respect human Ethical values, to be aware of the impact of our behavior on others, as well as to act consistently and in line with our values.

Chapter 3 – Integrity in Business

Fair Competition

APGAR vigorously and fairly competes for every business opportunity. Most countries where we operate have competition laws and trade regulations to preserve competition.

APGAR is committed to complying with the laws and regulations applicable in the countries where we are established and operate.

Standing Vigilant Against Corruption

The ability of APGAR to win new business depends solely on the value we bring to our customers. APGAR is committed to preventing violations of anti-corruption laws in each of the countries where we are established and operate.

APGAR does not tolerate any form of corruption or acts that may be perceived as such. Tolerating corruption is unacceptable behavior for the company, anywhere in the world.

As part of our Business ethics, Anti-corruption sets out our rules for preventing and detecting corruption or influence peddling in all their forms, in strict compliance with regulations, the group's code of ethics, and applicable internal procedures.

• Why do we have such rules?

Acts of corruption distort the normal, fair, and loyal functioning of commercial relationships, such rules will:

- Prevent any behavior that could be considered corruption (e.g., embezzlement, bribery, favoritism, conflict of interest, improper gifts/invitations, etc.) or influence peddling against any stakeholder.
- Ensure fair business practices
- Maintain APGAR's reputation
- Respect the law

• Who is involved?

These rules apply to all internal employees, including any manager, or staff member, such as an employee (fixed-term or permanent contracts), an apprentice, an external and/or occasional employee (temporary worker, intern, or external consultant with an APGAR email address) of the APGAR Group, including when operating outside of the Group's sites.

• What is this all about?

Corruption can be defined as the act by which a person holding a specific public or private position solicits or accepts a gift, offer, or promise in order to perform, delay, or omit to perform an act that falls, directly or indirectly, within the scope of their duties.

Corruption remains an unacceptable practice and APGAR has a zero-tolerance policy in this area.



Direct or Indirect

It can be **direct** (carried out by a Group employee) or **indirect** (carried out by a third party within the Group on behalf of APGAR, for example, a business partner or intermediary).



Granted Benefits

Regarding **benefits granted/received**, these may include sums of money, gifts or invitations, promises of employment, donations or sponsorships, discounts/rebates, or any other preferential treatment (e.g., favorable prequalification rules, conflicts of interest favoring a close relative, etc.).



Methods

The **methods or mechanisms** that can be used may vary, through kickbacks, over-compensation, redistribution of a portion of variable compensation, expense reports, or other.

• How to behave as a Collaborator?

Gifts exchanged between business partners are courtesies intended to establish and maintain business relationships. As a matter of principle, the acceptance or granting of so-called "business" gifts, such as invitations to events and meals, is permitted by APGAR within very reasonable limits* (defined below) and must be proportionate to the intended business objective.

Each employee should consider whether a gift received or offered is likely to affect their impartiality or that of the other person. If the answer is yes, the gift should be politely declined or not offered at all. In case of doubt, the Management and the Compliance Department may be consulted.



Example 1

You are in the middle of a tender and the person in charge of the decision is asking for a dinner in a luxurious restaurant to award APGAR.

You should not accept and should mention it to your management.



Example 2

You are in a middle of a project with your customer, and you are having a business lunch with the project manager.

This is fine if the amount spent remains within a reasonable limit*.



Example 3

This is Christmas and the company is offering a chocolate box to its customers.

This is fine if the amount spent remains within a reasonable limit*.

*** For reference, here are examples of criteria used to assess business gifts or invitations that could be considered 'reasonable':**

- **Modest value:** gifts or invitations of low or moderate value.
- **Proportional to the professional context:** directly related to a professional relationship or event, and not excessive or flashy.
- **Limited frequency:** occasional occasions only.
- **Appropriate nature:** symbolic or promotional gifts; invitations to non-luxurious venues accessible to the general public.
- **No influence:** the gift or invitation must not affect professional decisions or impartiality, and nothing is expected in return.
- **Transparency:** may be accepted without discomfort and the invitation or gift should be reported to management.

Any gift offered to or received by third parties must be declared from the first euro and approved in advance by the local Director.

We must bear in mind that corruption is an offense subject to criminal and civil sanctions in most countries where we are established and operate.

Anti-corruption laws prohibit offering, promising, or giving anything of value to a public administration representative or any private person to obtain an undue advantage, such as encouraging them to act favorably or avoiding acting unfavorably toward APGAR or its clients.

Anticorruption laws broadly define the term "public administration representative." This includes employees of companies partially owned by a legal entity, as well as employees of political parties and candidates for political office.

It is also prohibited to ask a third party to make or allow such offers, promises, or payments. Finally, it is forbidden to receive anything of value from a person who could influence or be perceived as influencing APGAR and its clients.

Conflict of Interest

A conflict of interest is a situation that arises when the independent, impartial, and objective exercise of an employee's duties is likely to be influenced by another public or private interest other than the one they are required to defend in their duties.

Conflicts of interest can lead to acts of corruption when a person abuses their position to obtain or provide an advantage that is unfair, inappropriate or not justified.

We must avoid any action that may conflict with the interests of APGAR or tarnish its reputation.



We are bound by a duty of loyalty and the obligation to act in good faith. A potential conflict of interest arises whenever our personal or professional interests are in contradiction. Thus, when personal interests conflict with APGAR's interests, we risk failing in our duty of loyalty. This occurs whenever the possibility of personal gain, whether direct or indirect, influences or can influence a decision related to our professional activity. We must avoid putting ourselves in situations where our individual interests may conflict with those of APGAR.

Examples of conflicts of interest:

- Taking part in a decision involving a close person (such as a family member, friend, or partner).
- Personally benefiting, directly or indirectly, from a contract, deal, or partnership related to one's position.
- Using confidential information for personal purposes or for a third party's benefit.
- Giving preferential treatment to a company or organization run by a close person, even if the relationship is not public.
- Exerting influence over a decision in favor of a political leader or elected official with whom one has a personal, affiliated, or family relationship, even without a direct reporting relationship.

If in doubt, employees may consult General Management or the local HR responsible.

Business and Financial Information

APGAR is committed to treating and disseminating truthful and accurate information transparently and in a timely manner, in accordance with all applicable laws and regulations, and in connection with the General Data Protection Regulation (GDPR) and any other local regulations.

We all produce information about APGAR, its clients, employees, business partners, or suppliers. All collected data must be handled with the utmost care and only for the specific purpose for which it was entrusted.

Chapter 4 – Relations with Our Partners

Our Clients

APGAR collaborates with its clients in an Ethical manner.

We are transparent with our clients about the relationships we have with our suppliers and partners. Our clients should be informed of any business relationships related to the services we offer them. We do not enter into agreements with suppliers or partners that go against the client's interests or break the law. APGAR ensures that its clients are informed of any collaboration.

We work with law-abiding clients whose values and behavior align with our principles, especially regarding human rights, anti-corruption laws, and competition law.

Our Suppliers and Partners

APGAR collaborates with its suppliers and partners in an Ethical manner.

We work with law-abiding suppliers and partners whose values and behavior align with our principles, especially regarding human rights, anticorruption laws, as well as competition law.

APGAR selects its suppliers and partners fairly and bases its decisions on quality and price. Under no circumstances will APGAR engage with a supplier or partner to do anything that contradicts its Ethics principles.

Relations with Our Partners.



Intellectual Property

Intellectual property is one of APGAR's most valuable assets.

We must ensure the validity and integrity of all intellectual property rights, whether protected by copyright, patents, trademarks, trade secrets, or confidentiality.

We must respect the intellectual property rights of our clients, competitors, business partners, and suppliers.

This means that all intellectual property created by APGAR employees during their employment with APGAR becomes the property of APGAR or the concerned client, as per the terms of the contract. We must not endanger any intellectual property, whether legally protected or not, during our employment with APGAR and after leaving the company.

Protection of Personal and Confidential Data

Protecting data is paramount for APGAR. Disclosure of such information could not only harm our reputation but also affect the trust of our stakeholders.

We are committed to protecting the personal information as well as the confidential data of our employees, clients, business partners, and suppliers.

We take appropriate measures to strictly adhere to the confidentiality commitments made by APGAR to its employees, clients, business partners, and suppliers. When working for multiple clients, we take necessary protective measures to prevent the disclosure of one client's confidential information to another.

At the end of the employment contract, outgoing employees must return all confidential information in their possession and comply with our confidentiality obligations.

Use of Material Resources

Material resources are provided to all company employees to carry out their tasks under the best conditions. We are responsible for taking care of our equipment, whether it is provided by APGAR or any of its clients, to ensure operational performance.

APGAR guarantees the proper use of the company's material resources provided to its employees.

Each of us is responsible for reporting any loss, damage, theft, waste, or improper use of material resources. We respect APGAR's security practices and ensure the implementation of good cybersecurity practices in line with internal information security policies and related documentation.

Chapter 6 – Corporate Social Responsibility

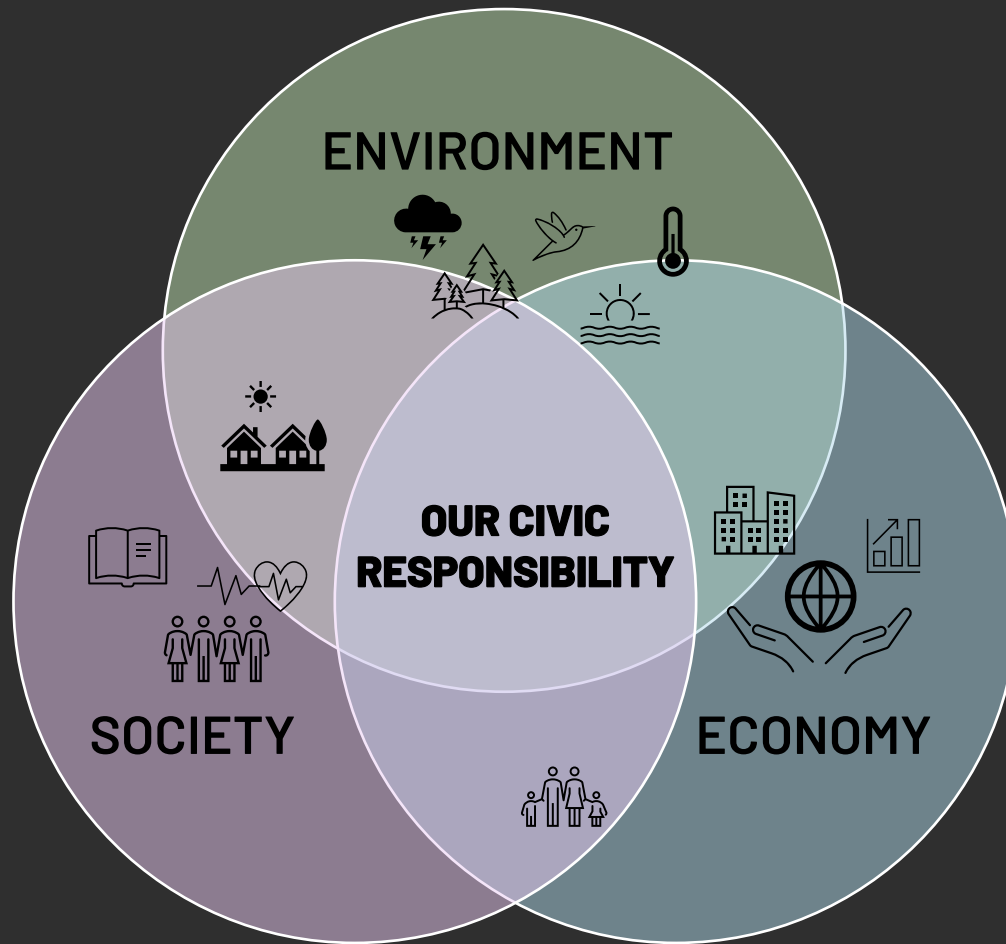
As a responsible company, APGAR is aware of the environmental impact of business activities and is committed to limiting it while respecting all legal obligations and other environmental requirements.

We seek to minimize our environmental impact as much as possible. We also innovate, adapt, and use our capabilities and expertise to help our clients reduce their environmental impact.

This includes making informed choices to minimize carbon emissions from professional travel, saving energy in our offices, seeking solutions to minimize the environmental impact of computer data processing, considering environmental impact in procurement decisions, reducing waste through recycling programs in our premises, avoiding single-use plastics, promoting green mobility by providing electric vehicle charging stations and contributing to other environmental initiatives.



Sustainability for Good Reasons



Sustainability Policy

APGAR recognizes its responsibility toward the environment, society, and the economy. We are committed to integrating sustainability principles in all our operations, while minimizing negative impacts, and maximizing benefits for our stakeholders.

By fostering a culture of sustainability, APGAR strives to be a responsible company that values both the environment and the communities it serves.

In line with our Sustainability Policy, CSR objectives focus on four key pillars:

- Carbon footprint reduction
- Efficient resource management
- Implementation of social commitments
- Sustainable innovation

We believe that sustainable development is essential for our long-term success as well as for the wellbeing of the planet and its inhabitants. We are committed to integrating these principles into all our actions and working together towards a more sustainable future.