



## QUANTEAM UK CODE OF CONDUCT

### Acting Responsible along the Supply Chain

Our Core values are the essence of our Company's identity.

It's not a simple marketing slogan, Quanteam UK's values are reflected in the daily behavior of the company's staff, its business and human practices and approach to clients.

### VALUES THAT GUIDE US ARE

**E**xcellence

**T**eam

**H**uman

**I**nnovation

**C**hallenge

**S**uccess

Quanteam UK promotes integrity and therefore the highest ethical standards in all aspects of its business. We would like to work with employees, associate consultants and business partners who share our values and culture of integrity particularly in respect of human rights, labour, and anti-corruption practices.

We expect them as well as anyone working for them or acting on their behalf to adhere and share the principles expressed in this code of conduct. You are key collaborator to us, and your commitment is paramount to our shared success.

Thank you for your engagement and we look forward to continuing to work together.

## Introduction

In alignment with our business model and as a part of our ongoing sustainability efforts we have developed this Code of conduct to ensure that all of our Employees, Associate Consultants, business partners (including Umbrella companies, Vendors, or any third party suppliers) meet our basic expectations of doing business related to legal requirements, ethical practices, and human rights. These standards are based on well-respected and recognized international standards, including the International Labour Organization, United Nations Universal Declaration of Human Rights, and industry best practices.

Quanteam UK is committed to those values and principles and we always seek to develop and strengthen relationships based on a shared commitment of transparency, collaboration and mutual respect.

We do recognize that our suppliers and business partners are independent businesses and the exclusive employers of their workers. However, our Code of Conduct is affecting not only our reputation but the level of trust we have established with all our stakeholders. Hence, and even if some of our partners are operating in different countries, cultures, and legal environments we are expecting them to comply with this code and hope they will strive to exceed these standards.

For the purpose of this Code of Conduct, Employees means Quanteam UK's employees, Associate Consultants means Personnel supplied by our Partners which includes umbrella companies and Limited Companies we work with. Suppliers will include any Quanteam UK's Suppliers, vendors, third party service providers including staff and any sub-contractor or sub-supplier they may have.

This code sets out the key social, and ethical values that we want you to abide by.

The code defines the non-negotiable minimum standards that we ask you to respect and adhere to. Compliance with the standards is a mandatory requirement when starting a relationship with Quanteam UK and at any time after. Non-compliance with this code may result in termination of our relationship.

## Ethics

### 1. Business Integrity

Our success or our failure in the industry is grounded in the quality of our services and the perception that our Services provide value to our clients. This value is created collectively with our employees, Associate Consultants, Partners, and Suppliers and therefore we must act collectively and adhere to the same principles.

Doing the right thing all the time is a core part of our culture. We have a zero-tolerance policy for anyone found in breach of the below principles:

- Anti-Bribery & Fighting Corruption

Corruption destroys trust, which is the basis of the economy and community life. Corrupt and bribery practices and the resulting court cases and scandals cause considerable damages to the reputation of the companies and individuals involved. More specifically, we are requiring you:

- Not to offer or make any bribe, unusual or unauthorized payment or inducement of any kind to anyone during business dealings
- Not to use Quanteam UK funds or assets for any unlawful or unethical purpose

- To reject all solicitations and do not make any proposals that could be construed as attempts at bribery
- Gifting

Quanteam UK has a no-gift policy. Gift offered by Vendors, suppliers, customers, potential employees or vendors and suppliers to an employee will not be accepted. This rule is intended to prevent employees from making decisions based on criteria other than performance, quality and competitiveness.

Independent Businesses we work with may have a gift policy in place. Gifts must not be offered or accepted in exchange of any favor and must be reasonable. You are required to always practice equal treatment and adopt an unbiased professionalism.

- Rejecting fraud

Fraud is when you deliberately deceive people to secure unfair or unlawful gain or to avoid fulfilling a legal obligation. Fraudulent practices cannot be justified however we recognize that everyone has the right to make a mistake as long as not deliberate. Therefore, we always encourage you to communicate with us as soon as a doubtful situation arises. We are committed to investigate, correct the situation if it was not intended and find a solution together.

- Conflict of Interest

We are expected to ensure that our employees or any individual working on our behalf are acting freely and with their own independent judgement and in accordance with our general principle's guidelines. To prevent a conflict of interest situation, we always request our employees and Associate Consultants to declare any outside of business interests they may have to assess and mitigate the risk of these interests to have an impact on Quanteam UK or its clients.

As Partners or Suppliers, you should have similar procedures in place to prevent such situation to arise.

## 2. Good faith

Adopting an honest behavior and communicate clearly create trust. "Do what we say and say what we do" is how we like to make business. We always prefer to have written commitment rather than oral communication or "gentleman's agreements". Having a written commitment is proof of integrity and determination to fulfill our obligations and commitment in a good faith.

Employees, Associate Consultants, Partners and Suppliers are requested to always act in a good faith and fulfill their obligations.

## 3. Intellectual Property

Quanteam UK respects the intellectual property rights of others and expects you to respect its intellectual property right. Any Transfer, use, downloading, copying or reproduction of our technology, patents, images, audio or any copyrighted information without prior consent is prohibited and subject to contract termination and legal procedures.

We are committed to protect intellectual property by physical means such as passwords for encrypting electronic data, locked storerooms for paper documents, careful processing of emails and paper

correspondences in compliance with relevant laws. You must ensure you are respecting Intellectual Property Rights and Relevant Laws all the time.

#### 4. Data privacy

All data and information created, stored and provided by Quanteam UK is strictly confidential. Employees and Associate Consultants are required to protect this information from unauthorized disclosure, safeguarding it from improper destruction or alteration. Each Employees and Associate Consultant accepts that its obligation of confidentiality does not have a time limitation and shall continue even if the relationship is ended.

Quanteam UK is committed to safeguarding the privacy of individuals we work with. This can include Customers, Suppliers, Business Contacts, Employees, Associate Consultants, and other people the organization has a relationship with or may need to contact. We have a data policy in place which summarizes what type of data we are processing and the reasons for processing. This policy is made available to anyone upon request. We do not hold any unnecessary data. We also have a data breach policy with strict procedures to report any suspected breach.

Partners and Suppliers are expected to respect the privacy rights of the individuals whenever Quanteam UK or Partners and Suppliers gather private information or implements worker monitoring practices.

You should also have a documented Data policy in place and make it available to all worker. This policy should give individual the ability to exercise their rights at any time.

#### 5. Whistleblowing and protection of identity.

We expect you to raise any concerns about our business conduct, or a potential breach of this Code of conduct. More generally, we encourage everyone to report issues of concern that may threaten Quanteam UK finances, operations or reputation. This also includes violations of any of our ethical commitments as regards to Human and labor rights, Equality and Diversity, Health and safety, business ethics... Example of concern:

- Suspicion of fraud, corruption, and accounting offenses
- Error reporting or manipulation of information
- Harassment or bullying, discrimination and racism
- Poor working conditions
- Labor rights

Concerns can be raised through our whistleblowing channels as set out below:

- Website: <https://www.quanteam.co.uk/whistleblower-channel>
- Email: [Whistleblowerchannel@quanteam.co.uk](mailto:Whistleblowerchannel@quanteam.co.uk)

Please include as much relevant information as possible.

Information we receive from Whistleblowing channel will be fully and objectively investigated, regardless of whether it has been received anonymously or not. All documentation will be kept confidential to the extent permitted by law.

You are expected to provide reasonable cooperation with any verification activity linked to this Code of conduct and during reported concern investigation.

Quanteam UK will make sure whistleblower are protected against retaliation. Their identity shall not be disclosed to anyone unless permission in writing is given to us.

Handling reports of concerns will be done in accordance with the Data Protection Act 2018.

## 6. Labor conditions and human rights

### *a. Workers are treated with dignity, respect, and fairness*

We are committed to provide a workplace environment where employees are treated with dignity, respect, and fairness without any sort of discrimination. Our working conditions framework has been designed to protect our Employees and Associate Consultants from bullying, harassment and more generally from any degrading treatment. We have policies and procedures in place which are communicated in a format and language understood by everyone and regularly updated. They also have access to a mechanism to report concerns, complaints, or potential violation of their rights through our Whistleblowing Channel.

### *b. Recruitment Practices are Ethical, Legal, Voluntary, and free from Discrimination*

As an employer, we want to ensure we recruit the right person for the role but at the same time we want our recruitment process to be fair. Our talent Acquisition team is regularly trained to ensure fairness in that process.

- Legality and voluntariness:
  - o Job applicants can always change their mind and choose not to continue a recruitment process they started with us. They just need to inform us of their choice. Once contractually engaged with us, they still have the freedom to say “No” at any time of our relationship if they wish by giving us reasonable notice. Every contract of employment we sign defines a probationary period. During that period, notice of termination may be given by either party without reason. When working with Associate Consultants, notice can also be given at any time by respecting a reasonable notice period to give us time to find a replacement and ensure continuity of the services provided to the clients.
  - o Trust between employers and employees is very important to ensure a good relation. We always seek individual permission to run background screening checks on prospective Employees or Associate Consultants.
  - o We always process data as per the UK Data Protection Act 2018, and Employees (Prospective or not) Associate Consultants (Prospective or not) and job applicants, as data subjects may exercise their rights at any time.
- Nondiscrimination: Quanteam UK is committed to eliminating unlawful discrimination and promoting equality and diversity in its own policies, practices, and procedures.

### *c. Workers are free from forced, trafficked and child labour*

The International Labor Organization has explained that forced labour is determined by the nature of the relationship between a person and an ‘employer’ and not by the type of work performed or the

legality of the work. In its guidance, “Indicators of Forced Labour” the ILO categorizes eleven indicators:



With the above indicators in mind, we are always improving our practices. We are committed to ensure fairness in the recruitment and onboarding processes. When a new employee chooses to work with us, a regular follow up is put in place at specific dates. We are meeting every new employee on a three months basis minimum and importantly we are available anytime our employee needs us for any reason. When the probationary period review meeting takes place, employees are required to fill-in a questionnaire to evaluate if the work they do corresponds to what has been presented during the recruitment process, if they are happy with what they do and if any adjustments needs to be made. If any concern is raised, it will be addressed by the HR Team without any delay.

We consider that an employee who is fairly recruited, who has regular meetings with his employer who is awarded for its work and who is free to leave at any time helps us to mitigate the risk of forced labour.

Quanteam UK does not and will not engage in or support the use of child labour. If Quanteam UK wishes to employ young worker, it will use a robust system for age verification purpose and will make sure to clearly define the non-hazardous activities the worker can undertake.

Partners and Suppliers are expected to follow the same guideline.

#### *d. Freedom to Change Employment Is Respected*

Employees are free to end their work relationship with Quanteam UK and terminate their contract provided that they give reasonable notice in accordance with national laws and contract. When a work relationship ends, we do not retain any personal documentation or unnecessary information that could prevent Employees or Associate Consultants from leaving their job. We are also keen to provide reference to any future employers upon worker’s request.

*e. Freedom of association and collective bargaining*

As per the Human Right Act 1998 - Everyone has the right to freedom of peaceful assembly and to freedom of association with others, including the right to form and to join trade unions for the protection of his interests.

This right applies to every workplace whether a union has been recognized or not. Quanteam UK does not formally recognize a trade union or a collective representative body, however we recognize and respect the right of our employees to freely associate with any organizations which exists to further and defend their interests in the workplace.

Employees shall not be dismissed or otherwise prejudiced for reason of membership of such an employee organization or because of participation in that organization outside of working hours, or with consent of their line manager, within working hours. Quanteam UK will respect its nondiscriminatory principle with this regard.

Partners and Suppliers are expected to follow the same guideline for our Associate Consultants.

*f. Health and safety at the workplace*

We believe, providing a safe and healthy work environment is of fundamental importance. We are committed to provide and maintain a healthy and safe working environment for all staff.

We take all reasonable steps to provide safe and healthy working conditions and to ensure compliance with all relevant health and safety legislation. Each Employee and Associate Consultant is expected to contribute to the safety of the workplace by being alert and aware of the rules, policies and procedures and by reporting any unsafe condition. We also encourage our clients, Partners and Suppliers to do the same.

*g. Wages and Benefits agreements are respected*

Wages are in line with the industry practices as well as in compliance with relevant laws and regulations. Contracts of employment clearly define wages and benefits and include details about salary calculation, date of payment, authorized deductions and extra work.

Salaries are based on industry standards and Quanteam skills-based salary scale. This help us to ensure equal remuneration for equal work.

Payroll is always prepared in advance to ensure payment on 28<sup>th</sup> each month the latest. Payments are made by bank transfer and payslips automatically sent to the Employee. If any deduction has been made, it's clearly communicated to the Employee in advance.

Partners and Suppliers providing personnel to us, our standard terms of payment are 30 days from invoice date but we are always keen to find better arrangements if reasonably requested. Upon receipt of invoice, payment date is confirmed by email.

Partners and Suppliers are expected to follow the same guideline and ensure prompt payment to the Associate Consultants.

*h. Integrity in the workplace: Inclusion, Diversity and Non-discrimination*

Equality of opportunity and treatment is a fundamental principle. We are conscient that our principal asset is our workforce, which is composed of employees with a wide range of characteristics, visible



or not. Reasonable adjustments might be needed by some of our employees as regards to their family responsibilities for dependents, religious requirements, temporary or permanent disability or any other cause. On a case by case basis, we are keen to make such adjustments and to help our people to fulfill their potential. We understand that happiness has a very positive impact on performance, and we are keen to provide any special support upon request.

At Quanteam UK, we believe that diversity drives innovation, so we're building a culture where difference is valued and where everyone can freely talk and give its opinions. At Quanteam UK, everyone is welcome.

Discrimination based on the following grounds is unlawful and therefore strictly prohibited:

- age (in respect of employment matters only)
- race, racial group, colour, ethnic or national origins
- gender, pregnancy, or marital status
- disability
- sexual orientation
- religion or belief

In addition, no worker should be subject to any physical, sexual, psychological, verbal harassment, abuse or other form of intimidation.

We are committed to complying in both letter and spirit with all anti-discrimination legislation and associated codes of practice in force either now or in the future. We have a zero-tolerance policy at this regard.

Partners and Suppliers are expected to treat their employees fairly and not discriminate against any group in their employment practices. They may also have a documented Inclusion and Diversity statement or non-discrimination policy.

### Non-compliance

Quanteam UK will ensure this Code of Conduct is given and understood by every Employees. Non-compliance from our employee will lead to Disciplinary and Grievance Procedures, consequences may ultimately include dismissals.

As Partners and Suppliers, it is your responsibility to ensure your own employees are informed about this code. In case of non-compliance, you will be required, following a written notice from Quanteam UK, implement appropriate measures to restore compliance.

In summary, we expect you to share the aims and commitments described in this Code and to comply with the obligations and responsibilities in it.

Thank you for being engaged in our values and in fostering a culture of integrity.