

# XDS CODE OF ETHICS

In line with industry requirements, the Code of Ethics outlines the values, principles, and rules applicable to all members of the XDS community. This code has been integral to XDS's growth and the development of trustworthy relationships with clients, business partners, and employees.

XDS customers, in particular, expect the company to demonstrate exemplary integrity in the delivery of its services. Integrity, impartiality, and independence are paramount concerns for all XDS employees and have become key selling points contributing to the company's reputation.

Every XDS employee plays a vital role in upholding the Code of Ethics, actively embracing and championing its values, principles, and rules. Compliance with the code is integral to our business processes and future success, aiming to preserve and enhance XDS' reputation as a socially responsible company.

Adherence to the Code of Ethics is mandatory for all XDS employees, including business partners such as subcontractors, contractors, and suppliers, who must also act in accordance with our ethical standards when representing or dealing with XDS.

It is essential to recognize that any violation of the Code of Ethics carries significant consequences, potentially harming individuals or the entire XDS organization and tarnishing its reputation. XDS managers are held to the same strict standards as all employees, emphasizing the importance of unwavering adherence to the Code of Ethics.

Each employee is expected to:

- Thoroughly read, comprehend, and implement the values, principles, and rules outlined in the Code of Ethics in their daily activities.
- Promptly seek guidance from their direct manager or Quality Manager in case of any concerns or questions regarding the application of the Code of Ethics

# XDS CODE OF ETHICS

## OUR FOUR CORE VALUES:

These values are fundamental to XDS, guiding our conduct:

### 1. INTEGRITY AND ETHICS

- Acting with honesty, fairness, and good faith.
- Fulfilling commitments made.
- Conducting services based on clear contracts and defined actions.
- Adhering to company policies and procedures.
- Respecting the confidentiality of business and personal information.
- Upholding local and international ethical and professional standards.
- Providing necessary information, instruction, and training for health and safety.
- Fulfilling health and safety duties and responsibilities at work.

### 2. IMPARTIALITY AND INDEPENDENCE

- Providing professional and unbiased advice.
- Producing accurate reports that reflect findings in line with best practices.

### 3. RESPECT FOR ALL INDIVIDUALS

- Treating others with respect and consideration.
- Considering the impact of actions on others.
- Recognizing and valuing individual contributions, providing feedback on performance.
- Respecting differences and avoiding discrimination based on nationality, ethnicity, age, gender, or religious/political beliefs.

### 4. SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

- Upholding social responsibility by balancing profitability and accountability.
- Respecting the community, people, and environment in which we operate.
- Considering the impact of actions on the community, people, and environment.

## OUR KEY PRINCIPLES

### 1. Adhere Strictly to Our Code of Ethics

- Our company's growth and progress rely on our fundamental principles, which apply universally to all XDS employees, business partners, subcontractors, agents, and suppliers.
- Implementing our Code of Ethics ensures the proper conduct of our daily operations. It is imperative that every employee understands and upholds our Code of Ethics.

### 2. Uphold Transparency, Honesty, and Fairness

- In situations where laws or regulations are absent, the principles of transparency, honesty, and fairness should guide our actions.
- No employee should act in a manner that contradicts our values, principles, or rules outlined in our Code of Ethics, even if it seems to benefit XDS.
- Performance objectives should not be pursued if they require compromising laws or regulations.

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## 3. Full Compliance with Laws and Regulations:

- We are dedicated to fully complying with the laws and regulations of the countries in which we operate. XDS's integrity is established on our adherence to these legal requirements.
- It is the personal responsibility of each XDS employee to adhere to the laws and regulations of the countries where they provide services.
- Any activities that could involve XDS in unlawful practices are strictly prohibited. Compliance with our Code of Ethics extends beyond mere legal compliance. However, if following our Code of Ethics conflicts with local laws and regulations, the latter must be prioritized and followed.

## 4. Combatting Bribery and Corruption:

- XDS is fully committed to combating bribery and corruption in all countries of operation.
- No XDS employee shall promise, offer, or pay any bribe, directly or indirectly, to procure orders or obtain benefits for XDS.
- Likewise, no employee shall solicit or accept bribes, directly or indirectly, in the course of their duties.
- Any involvement in bribery constitutes a violation and may result in disciplinary action, including termination of employment.

## APPLICABLE RULES

### 1. Integrity of our services

We must avoid situations in which our professionalism, independence or impartiality may be compromised. We are committed to examining and

dealing with such situations openly and transparently.

Our work shall be carried out honestly in a professional, independent and impartial manner, with no influence tolerated with respect to any deviation from either our own approved methods and procedures or the reporting of accurate results or findings. We must not bow to any pressure or influence to change our results or findings.

Data, test results and material facts shall be reported in good faith. Our reports, test results and certificates must accurately state the actual findings, professional opinion or results obtained.

Through our processes and controls, we ensure the integrity of our services.

### 2. Integrity of documents and information supplied

Each XDS employee is personally responsible for all the information he or she provides and for all the documents he or she produces, such as, but not limited, to reports, test results and certificates.

All XDS employees must ensure that such information and documents communicated by them, including through IT systems, internally, or, externally to customers, contain reliable, truthful and complete information.

This also applies, among other things, to information and documents in respect of human resources, finance, legal and documents submitted to governmental or regulatory authorities.

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## 3. Integrity of financial and accounting documents

All financial and accounting information must be duly and correctly recorded in XDS books and accounts and should, in no case, be the subject of incomplete, erroneous or fraudulent treatment. All entries must be justified by the appropriate items of proof, in good faith.

All documents must be stored in accordance with the applicable laws and XDS procedures.

## 4. Internal control of financial and accounting information

Internal control objectives are to ensure the quality and reliability of the financial and accounting information supplied.

Each XDS business unit or department manager is responsible for internal control in conformity with XDS procedures.

XDS managers must ensure that data recorded in the reporting system at half year and for the end of year closure, are in line with the information due to be published, with the results of the period and with the financial position at the end of the period.

## 5. Fighting bribery and corruption

- We ensure all XDS employees have knowledge that it is prohibited to solicit, accept offer or give directly or indirectly a bribe in the course of the performance of their duties.
- We prohibit certain operations such as facilitation payments or kickbacks.

- We submit to prior approval all political contributions, charitable donations and sponsorships.
- We maintain accurate books and records which properly and fairly document all financial transactions.

It violates XDS policy, and applicable laws may make it a criminal offence, for any XDS employee to solicit or accept, directly or indirectly, a bribe in any form (money, gifts, services or other benefit) to induce such employee to do something he or she should not do, or, to induce such employee not to do something he or she should do, in the course of the performance of their duties within XDS.

All XDS employees must strictly comply with this code of ethics policy.

XDS is fully committed to fighting all forms of bribery and corruption in every country in which it operates and to apply relevant local and international anti-bribery and anti-corruption laws in all jurisdictions within which XDS is established or performs services.

## 6. Dealing with Business partners

- We monitor the selection and the ethical behavior of our business partners: subcontractors, agents, main suppliers.
- We require that our business partners comply strictly with national and international anti-bribery and anti-corruption laws and regulations and we seek to ensure that improper payments are not being channeled through intermediaries, joint venture partners, subcontractors, agents or suppliers.
- We conduct our procurement practices in a fair and transparent manner.

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## 7. Conflicts of interest

A conflict of interest is a situation in which XDS interests differ from personal interests, with those of close family or of persons with whom we are involved in a personal or business relationship.

You should avoid such situations, which may influence your judgment even if you think your judgment is not influenced.

It is vital for you to be independent and to report any commitment or link which may create a potential conflict of interest.

We regulate all situations which may generate such conflicts. This includes outright prohibition in certain cases, and prior verification, notification or authorization in other cases.

Examples of situations which we regulate:

- To offer or to influence an offer of a job to a family member or to a person with whom you have a close personal relationship, without first having obtained approval of the person to whom you report.
- To have a family or a close personal relationship with a person who is in your reporting line without having informed in writing your Direct Manager or Quality Manager.
- To have a family or close personal relationship with a person in a subcontractor, supplier or client of XDS with which you are directly involved, without having informed in writing your direct Manager or Quality Manager.
- To have a family or close personal relationship with a person in Competitor employed in the

same area of business with which you are directly involved, without having informed in writing your Direct Manager and Quality Assurance Manager.

- To solicit directly or indirectly a personal gain granted to you as XDS employee.
- To accept appointments while being or remaining an Employee of XDS outside of XDS, without first having obtained approval of the person to whom you report.
- To acquire directly or through relatives, friends or intermediaries an interest in a competitor, supplier or client, except as set forth in XDS internal procedures.
- To use goods or resources of the company which employs you, for your own personal use.
- In case of doubt, stop and raise your concern with your direct manager or Quality Manager.
- All declarations will be kept confidential and treated with discretion and respect.

## 8. Fair competition

We are committed to competing fairly and in compliance with antitrust and all other applicable laws. Competition or anti-trust laws typically prohibit agreements among competitors as to pricing or other competitive terms, or, as to the division of markets or business. Severe civil and criminal sanctions can be imposed if competition or antitrust laws are infringed by companies and/or their employees. All XDS employees must strictly comply with all applicable competition or antitrust laws. When in doubt, any employee should seek advice from the direct manager or Quality Manager.

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We shall present XDS in a fair and reasonable manner and ensure that information supplied is accurate and unequivocal.

We must encourage total transparency when drafting commercial documents and promote the strengths of XDS rather than highlighting the shortcomings or failings of our competitors.

We must not intentionally denigrate, libel or slander our competitors when discussing with clients, nor commit ourselves to providing a service which we are unable to supply, or claim that XDS is accredited for a given service without checking first.

## 9. Observance of confidentiality rules

All information received in the course of the provision of our services must be treated as, and must remain, strictly confidential, subject to authorized release.

All XDS employees are personally committed to protect the information in their possession, and to ensure that it is kept confidential by employees working under their control, either by providing for specific contractual provisions in their employment agreements, or by the signature of confidentiality agreements, or by any other legally appropriate means. XDS employees remain bound by these confidentiality obligations after leaving their jobs.

Everyone should ensure that the protection of such confidential information is secured by implementing locally adequate security measures, ensuring that access is restricted to authorized persons only, and that the documents are stored in designated secure areas and disposed in a secured manner. In case of doubt, you should seek advice from your Direct manager Quality Manager.

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## 10. XDS Intellectual property rights and trademarks

Technical, commercial and financial information, software, methodologies, trade secrets, databases, inventions, know-how developed or acquired by XDS and information governed by non-disclosure agreements must be treated as (and must remain) strictly confidential. The use of such information must be restricted to permitted professional purposes, to the exclusion of personal purposes and should be shared with or given to authorized persons only.

## 11. Communication with the media

We develop active communications to reinforce XDS image towards its customers and to the public, however such communications with the media may affect XDS image.

Great care must therefore be taken to examine and verify it. All statements to the media or responses to inquiries from the media shall be either handled through this department or coordinated by it.

## IMPLEMENTATION OF THE CODE OF ETHICS

The following documentation shall apply to all XDS employees:

- This Code of Ethics,
- Declaration of No Conflict of Interest
- Any other internal local or technical rules relating to ethics matters.

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## 1. Scope of implementation

The Code of Ethics applies to all XDS employees who are expected to comply with it, together with our business partners (i.e., subcontractors, agents and suppliers), who must adhere to this Code of Ethics in all their dealings with or on behalf of any XDS company.

We must ensure that they are aware of the contents of this Code of Ethics and comply with it.

## 2. Ethics organization

Each manager is responsible to ensure that all employees are familiar with and apply the Code of Ethics policy, notably by providing his or her employees with a copy of the Code of Ethics, by training them, by informing them of their duties resulting from the Code of Ethics in simple, practical and concrete terms, and by ensuring that they understand that any violation of this Code of Ethics would constitute a serious violation of the employee's duties.

## 3. Compliance with the Code of Ethics principles and rules

Compliance with the Code of Ethics principles and rules is included in the annual evaluation of each XDS employee. Each XDS employee shall have the opportunity to provide input on the development of the Code of Ethics at performance evaluations, staff training sessions or review meetings.

Any XDS employee who fails to comply with the Code of Ethics shall be subject to disciplinary measures which may include the termination of his or her contract of employment. In all cases, the author of any violation shall in any case have the right to be heard and to defend himself or herself before a disciplinary measure is imposed.

If an XDS employee believes in good faith that a rule or one of the principles laid down in the Code of Ethics has been or is about to be violated, he or she should inform his or her direct manager or Quality Manager.

For any questions or concerns regarding the implementation or interpretation of the Code of Ethics, any employee is free to contact immediate direct line manager or Quality Assurance Manager.

Upon request, the question must be handled with confidentiality and anonymity shall be preserved as far as it is reasonably practicable.