

Quality, health, safety and environment policy - Code of conduct

April 2, 2024 – revision 11 – ERM432_10 (the French version prevails over any other version)

GROUPEMECA

SHAPING EXCELLENCE

GROUPEMECA.COM

Table of contents

GROUPEMECA Quality, Health, Safety and Environment Policy	3
GROUPEMECA Code of conduct	4
Introduction	4
Purpose, scope, laws and regulations	4
Ethical standards and internal policies	4
Environmental norms	5
Corporate social responsibility	5
Prohibition of child labour	5
Prohibition of forced labour	5
Prohibition of illegal, clandestine and undeclared labour	5
Prohibition of harassment and abuse	5
Prohibition of discrimination	6
Salaries and benefits	6
Working hours and holidays	6
Health and safety	6
Professional integrity requirements	7
Prohibition of all forms of corruption	7
Prevention of conflicts of interest	7
Prohibition of money laundering	8
Competition compliance	8
Communication and confidentiality	8
Customs authorities, trade restrictions and international sanctions	9
Donations	9
Quality	10
Questions and concerns	11
Reporting system	11
Code of conduct - Contact form for informants	12
Lode of Conduct - Contact form for informatics	12
Code of conduct - Rules of confidentiality	13
Code of conduct - Nadcap requirements	14
Fraud - Contact form for informants	15
- CCC CONTEGE TOTAL TOTAL MILITIALITY	13
GROUPEMECA - Our companies	16

GROUPEMECA Quality, Health, Safety and Environment Policy

Within GROUPEMECA, there are three essential pillars to achieving our mission: guaranteeing the safety and well-being of our staff, visitors and subcontractors; minimising the impact of our activities on the environment; and maintaining the quality of our products and services, solutions we offer to our customers.

This policy does not only exist to **fulfil our legal obligations**, **requirements or voluntary commitments**, it aims to encourage everyone in the company to act responsibly and ethically within our community, to respect each other's integrity and to contribute to the protection of our planet. GROUPEMECA also wishes to protect the company's assets, including human capital, products, physical and virtual property, financial assets, intellectual property and confidential information. To achieve this, the company uses dynamic loss prevention, asset preservation and risk management and transfer methods.

The trust placed in GROUPEMECA by its customers, employees and business partners is a priority. To further strengthen this trust, the organisation has adopted a **code of professional conduct** which sets out the company's **fundamental values and ethical rules**. The code of conduct forms the basis for all business decisions and regulates working relationships with all business partners.

GROUPEMECA has put in place a system to enable employees, customers and business partners to bring to GROUPEMECA's attention any criminal wrongdoing or any other serious criminal offence in a confidential manner. In order to implement this Integrated Policy, we have communicated to all persons working at or on behalf of GROUPEMECA, as well as to any other interested party, the periodically reviewed objectives and indicators which allow us to monitor performance and continuously improve our integrated management systems. These various steps, aimed at continuous improvement, are based on individual responsibility and on the mobilization of all personnel, at all levels.

The aim of this Integrated Management Policy is to enable our site to develop continuously on the basis of the best available technologies without incurring excessive costs. This privileged point of view has enabled us to set up an organisation and define preventive analysis methods for all our sectors of activity in order to:

- → Protect the health, safety and well-being of all our employees;
- → Minimise the consumption of natural resources and limit our impact on the environment;
- → Prevent accidental situations (pollution, industrial accidents, safety incidents, etc.) and any drop in quality through continuous improvement;
- → Respect all current local laws and regulations as well as GROUPEMECA's international requirements, or any other requirement that GROUPEMECA has undertaken to respect;
- → Continuously **satisfy our customers**' needs in terms of **quality, deadlines and service**;
- → To increase the company's economic performance and guarantee a return on investment;
- → **Ensure the continuous improvement** of the company's products, services, processes and systems;
- → Provide staff with the necessary training to ensure the **development of the skills** required to guarantee the sustainability of GROUPEMECA's performance and growth.

GROUPEMECA's Management Committee is unanimously committed to supporting this policy and its values.

JULIEN PAPART

COO GROUPEMECA

GROUPF**MECA**

PIERRE SCHA

CEO GROUPEMEC

VERONIQUE BAURANT

CQO GROUPEMECA

gunant

GROUPEMECA Code of conduct

Introduction

A company's reputation is one of its greatest assets, establishing **trust with employees**, **customers and business partners**. Wherever the organisation operates, it is of the utmost importance that we comply with all applicable laws and regulations and rigorously **uphold our own ethical standards**.

Every GROUPEMECA employee is required to observe the principles set out in this code. Your actions not only affect your reputation and image; failure to comply with these rules may also cause other serious damage and a loss of trust among employees, customers, and business partners.

GROUPEMECA attaches great importance to its companies and their partners respecting a common set of principles in terms of ethics, social responsibility, and environmental protection. GROUPEMECA therefore asks its suppliers to comply with the principles mentioned in this Code of Conduct and to ensure that they are respected by their own suppliers and subcontractors.

Purpose, scope, laws and regulations

This Code of Professional Conduct sets out GROUPEMECA's commitments to its three main stakeholders:

- → Employees;
- → Customers;
- → Business partners.

It forms the basis of all GROUPEMECA's business activities. It must be read in conjunction with the company's various policies and directives. The rules defined in this document apply to all GROUPEMECA employees. Managers have a particular responsibility to ensure that these rules are communicated to their teams and that they respect them.

All GROUPEMECA's activities and the professional conduct of all its employees must comply with the laws and regulations in force and with the relevant internal policies, directives and standards. **Any violation of these rules** may lead to the imposition of **disciplinary measures**, including the dismissal of the employees concerned.

Ethical standards and internal policies

Regardless of any specific applicable legislation, GROUPEMECA adheres to certain ethical standards:

- → Supports and respects international human rights;
- → Respects freedom of association and recognises the right to collective bargaining;
- → Implements a zero tolerance policy with regard to the prohibition of forced and compulsory labour as well as child labour;
- → Respects diversity such as race or origin, gender, religion, age or sexual orientation;
- → Promotes environmental responsibility and aims to reduce the environmental impact of its business activities;
- → Has a zero-tolerance policy on corruption in all its forms.

All employees are expected to respect these ethical standards. Anyone who **witnesses or suspects a breach** of these standards is encouraged to report their concerns via the following email addresses: p.schaaps@groupemeca.com; j.papart@groupemeca.com



Environmental norms

GROUPEMECA is committed to respecting the values of sustainability and **environmental protection**. The organisation has drawn on its environmental management system, set up and certified in accordance with the ISO 26000 ECOVADIS standard, to introduce processes designed to reduce the environmental impact of its commercial activities, both in terms of its purchasing and operational activities.

GROUPEMECA requires its suppliers to comply with local and international environmental regulations and standards, to obtain the required environmental authorisations and to implement the necessary measures to meet the following requirements:

- → Implementation of a system guaranteeing the traceability and regulatory compliance of raw materials and substances used;
- → Implementation of an environmental management system;
- → Improving the environmental performance of their sites and production facilities, in particular by treating waste appropriately, eliminating air, water and soil pollution, reducing greenhouse gas emissions (by promoting the use of renewable energies and improving the proportion of recyclable materials), reducing their water and energy consumption, and managing hazardous chemicals appropriately;
- → Ensure that staff whose activities have a direct impact on the environment are trained, competent and have the resources they need to carry out their duties effectively.

Corporate social responsibility

GROUPEMECA takes its social responsibility towards the communities in which it operates seriously. As within its own companies, GROUPEMECA expects its partners to behave irreproachably in terms of social responsibility. This includes:

• Prohibition of child labour

The employment of children under the age of 16 is strictly prohibited. In countries where local legislation provides for a higher age for work, or extends compulsory schooling beyond the age of 16, the higher age applies. Any type of work that is likely to compromise the health, safety or morals of children must not be carried out by anyone under the age of 18.

• Prohibition of forced labour

The use of forced labour, slavery, servitude or human trafficking, as well as the withholding of identity papers or work permits, the demand for any security deposit from workers, or the use of any other form of coercion, are strictly prohibited. All workers have the right to accept or leave a job freely. Suppliers may not oblige workers to work in order to repay a debt owed to them or to a third party.

• Prohibition of illegal, clandestine and undeclared labour

Our partners must comply with all applicable regulations to prevent illegal, clandestine and undeclared work.

Prohibition of harassment and abuse

Our partners are expected to treat their workers with respect and dignity. Our suppliers may not accept or practise any form of corporal punishment, physical, sexual, verbal or psychological harassment, or any other form of abuse.

• Prohibition of discrimination

GROUPEMECA respects and appreciates the cultural diversity of its staff, customers and business partners. Each of our employees has a personal responsibility to treat colleagues, business partners and customers with dignity and respect. No discrimination based on gender, race or origin, ethnic origin, nationality, religion, cult, age, political or trade union activities, disability, sexual orientation or any other characteristic protected by law will be tolerated. We expect our partners to treat all their employees equally and fairly. Our suppliers may not discriminate in any way - particularly in relation to pay, recruitment, access to training, promotion, maternity protection, or dismissal - on the basis of the above criteria.

Salaries and benefits

Our suppliers must, as a minimum, pay a regular and at least monthly salary, pay overtime at the legal rate, and comply with all legal requirements regarding social benefits. Where there is no legal minimum wage or overtime rate in the country concerned, the supplier must ensure that wages are at least equal to the average minimum in the relevant industry sector, and that overtime pay is at least equal to the usual hourly rate. No wage deductions should be made for disciplinary reasons. We expect our suppliers to guarantee all workers the benefits provided for in any collective agreement, company agreement and any other applicable individual or collective agreement.

• Working hours and time off

Our suppliers must comply with applicable local laws and regulations, which may under no circumstances exceed the maximums set by internationally recognised standards such as those of the International Labour Organisation. Our suppliers may not impose excessive overtime. The total number of hours worked per week, including overtime, may not exceed legal limits.

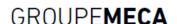
In Belgium, provision is made for overtime to be worked (see the Act of March, 5 2017 on feasible and manageable work) in order to cope with an extraordinary increase in workload or a case of force majeure. This overtime gives rise to the payment of extra pay and compensatory time off in order to comply with the average length of working time. So-called "voluntary overtime" enables employees to work a quota of overtime hours at their request, thereby supplementing their pay. The employee must first sign a written agreement with his/her employer. The employee may then work overtime, which will give rise to payment of the usual additional salary, but not to compensatory time off.

There are many circumstances in private life that allow time off work: when you become a parent (maternity leave, birth leave, parental leave, adoption leave, etc.), when you hold a political office, to take care of a relative, or for training purposes. GROUPEMERCA follows the legislation in force concerning these periods of leave. Its employees are also entitled to at least the minimum number of days off established by the applicable legislation.

Health and safety

GROUPEMECA is committed to **providing a safe working environment** and guarantees compliance with all necessary safety standards and legal requirements. Our employees are required to **comply strictly with all health and safety at work regulations**, to report without delay any observation of a fault and to promote compliance with these standards, including towards our business partners.

Our suppliers are expected to provide their workers with a safe and healthy working environment in order to avoid accidents or personal injury that could be caused by, associated with, or resulting from their work, including during the handling of equipment or during work-related travels. Suppliers must establish procedures and training to detect, avoid and mitigate, as far as possible, any hazards that may represent a risk to the health, hygiene and safety of personnel. They must comply with all applicable local and international laws and regulations in this respect. The same principles apply to accommodation provided by suppliers.



<u>Professional integrity requirements</u>

GROUPEMECA requires its suppliers to act in full compliance with the applicable local, national, and international legislation in the conduct of their business. This concerns in particular:

• Prohibition of all forms of corruption

GROUPEMECA applies a **zero tolerance policy** with regard to corruption and influence peddling. We expect our suppliers to comply with all applicable laws relating to corruption and to take appropriate measures to prevent, detect and punish any act that could be construed, directly or indirectly, as corruption or influence trafficking within the scope of their activities.

Gifts and invitations may be acceptable courtesies in an established business relationship if they are limited in reach and value, are offered openly and transparently, are permitted by local law or custom, are intended to reflect consideration and recognition, and are not offered with the expectation of something in return. In some cases, such practices may fall within the scope of specific anti-corruption provisions or other legal rules, which should therefore be known and complied with. Gifts, invitations and other benefits received from a business partner may exert inappropriate influence on the recipient.

Each GROUPEMECA employee who is responsible for selecting commercial partners likely to act on behalf of the organisation must therefore:

- → Strictly comply with the business partner selection processes in force;
- → Ensure that appropriate information and guidance is provided to relevant business partners;
- → Adequately observe and monitor their professional conduct and take appropriate action to remedy any apparent deviation from expected standards.

Employees may not offer or grant unjustified personal benefits, either directly or indirectly, in exchange for or in anticipation of inappropriate behaviour or benefits. The rules, value thresholds and approval processes defined in GROUPEMECA's guidelines on gifts and invitations must be strictly observed at all times.

GROUPEMECA also does not tolerate consultants, agents, commercial representatives, or any other commercial partner acting on behalf of the company offering or granting such inappropriate advantages during their business relations on behalf of GROUPEMECA.

• Prevention of conflicts of interest

The professional conduct of all GROUPEMECA employees and representatives must always be determined in accordance with the interests of the organisation. Business decisions or actions may not be unduly influenced by the personal interests of the employee concerned. GROUPEMECA employees may therefore only accept gifts, invitations or other personal benefits that comply with the rules, value thresholds and approval processes defined in the organisation's directives relating to gifts and invitations, and provided that the benefit is not or does not have the appearance of having been granted in exchange for or in anticipation of an inappropriate act or an advantage in favour of the business partner.

Each GROUPEMECA employee must therefore strictly observe the rules of the organisation's competition law policy. In particular, they must never:

- → Seek to obtain commercially sensitive information illegally;
- → Exchange commercially sensitive information with competitors;
- → Enter into anti-competitive or other prohibited agreements with competitors, customers or any other business partner;
- → Nor participate in professional associations, lobbying groups or external benchmarking activities without prior approval from the relevant Management and having obtained instructions from the Compliance Officer or the Legal Department.

We require our suppliers to comply with all applicable legislation on conflicts of interest, and to endeavour to prevent the occurrence of situations creating a conflict of interest in the context of their collaboration with GROUPEMECA.

Prohibition of money laundering

Money laundering is the introduction of financial assets resulting from corruption or other illegitimate sources into the legal economy. GROUPEMECA intends to associate only with customers and other business partners whose commercial and financial activities comply with the laws in force and takes appropriate measures to prevent its business processes from being used indirectly for money laundering.

Money laundering can occur when action is taken to conceal the true origin of sums or assets linked to criminal activities. We expect our suppliers to commit to taking all appropriate measures to prevent their operations being used as a vehicle for money laundering.

All GROUPEMECA employees must comply with current money laundering regulations. In particular, the organisation's employees must:

- → Comply with the accounting principles in force for cash operations and other transactions;
- → Report to the Mnagement Committee any suspicious behaviour by customers or any other partner;
- → Adhere to all resource-saving processes and those that limit the environmental impact of our activities.

All accounting entries must be accurate and reflect the true nature of the transactions carried out. Unless explicitly stated otherwise, all GROUPEMECA funds and property are used solely for purposes consistent with the company.

• Competition compliance

The rules of competition law are designed to ensure fair competition in the marketplace. Any breach of these rules can result in heavy fines and serious damage to a company's reputation. GROUPEMECA's position on this issue is clear: we adhere strictly to the rules in force without exception. We expect our suppliers to undertake to comply with the competition laws applicable in the countries in which they operate. This covers the prohibition of abuse of dominant position, collusive practices or illicit agreements between competitors.

Communication and confidentiality

Intellectual property rights (patents, models, trademarks) and the protection of their confidentiality are essential to preserve the group's technological lead. Intellectual property also protects holders of industrial property rights (including, but not limited to, trademarks and patents). Infringement of an intellectual property right includes, but is not limited to, the unauthorised dissemination, distribution or representation of a protected work, brand or patent, as well as the creation and distribution of unauthorised copies of protected intellectual property. GROUPEMECA ensures the protection of innovations by applying and respecting the specific legislation of each country when registering patents.

All GROUPEMECA internal information that is not explicitly defined as public must be treated as confidential. Responsibility for the company's commercial communication with the media and the general public lies with the sales department. In the course of their business dealings on behalf of GROUPEMECA, employees may have access to non-public information concerning the company. The staff commits not to divulge the confidentiality of products and customer projects under development, including information relating to the product. GROUPEMECA employees are prohibited from using such non-public information in their own commercial or financial interests, or in the interests of third parties.

GROUPEMECA collects, processes and uses personal data to provide its logistics services. When processing personal data, the company strictly complies with all applicable laws and regulations. Employees handling personal data must comply with all relevant internal directives.

All information collected and/or processed as part of GROUPEMECA's activities must be protected against misuse or unauthorised access. Employees are obliged to comply with internal rules relating to IT security which provides continuous protection to the confidentiality and ownership of information.

Employees who communicate privately on matters concerning the company are required to explain that they are speaking on their own behalf, to remain courteous during any discussion and not to conceal their connection with the company.

Our suppliers must commit to taking all necessary measures to guarantee the confidentiality of professional secrets and other non-public information communicated within the framework of their business relationship with GROUPEMECA. We also require that they comply with the laws and regulations applicable to the protection of personal data, in particular those applicable to the GDPR regulation.

Customs authorities, trade restrictions and international sanctions

We require our suppliers to comply with all applicable customs legislation, including regulations regarding imports and the prohibition of transshipment of goods into the importing country.

A number of countries and international organisations impose sanctions, i.e. restrictions on the supply of certain goods, services, financial resources and/or knowledge, on specific individuals, organisations or countries, in particular when they are suspected of supporting terrorist activities. GROUPEMECA complies with all the regulations in force on sanctions and has put in place technical processes to ensure the **identification** of the entities and individuals concerned.

We require our suppliers to comply with international trade restrictions and sanctions, as they evolve, as well as export control laws and regulations.

Donations

As a responsible member of civil society, GROUPEMECA supports charitable causes through donations. All GROUPEMECA employees are encouraged to propose ideas to support this initiative. In particular, the following points must be respected with regard to any donation:

- → Donations can only be addressed to charitable causes whose objectives are in line with the company's culture and values;
- → Donations to political organizations are not permitted;
- → Donations cannot be made in exchange for a commercial advantage;
- → All donations must be approved in writing in accordance with the requirements of GROUPEMECA's guidelines on gifts and invitations;
- → Any impression to illicitly influence an employee, client, or business partner of GROUPEMECA must be rigorously avoided;
- → Gifts, invitations, or other material or immaterial benefits to employees, clients, or business partners are therefore generally prohibited;
- → Any exception requires prior written approval from the Management Committee.

Quality

The satisfaction of its customers is the main priority of GROUPEMECA, which prioritizes customer orientation in all its operational processes. In their relationships with customers, all employees are required to:

- ightarrow provide quick and appropriate solutions;
- → demonstrate involvement and remain courteous in their interactions.

In accordance with this commitment, all employees of GROUPEMECA are required to:

- → observe all defined quality standards;
- → ensure that business partners adhere to all established standards;
- → prefer preventive actions to corrective measures whenever necessary.

The Management Committee acknowledges that the competence and dedication of its employees are the foundation of its success. It has established a set of common rules and procedures to ensure a positive work environment.

GROUPEMECA's commitment to quality is central to its activities. The group is proud to be among the leaders in Europe. In a quest for excellence, GROUPEMECA consistently works to improve its processes for the benefit of its shareholders, employees, clients, business partners, and other stakeholders.

In order to provide its services, GROUPEMECA relies on a wide range of **business partners** such as suppliers, subcontractors, and other collaborators. GROUPEMECA appreciates their importance for its operations and values their contribution to its success. To enable effective long-term cooperation, it is essential that all GROUPEMECA employees treat the organization's business partners with respect and integrity, and adhere to all internal and external rules governing their relationships with them.

In return, GROUPEMECA should be entitled to expect from its partners that they adopt the same attitude in their behavior towards the organization and in the services they perform on behalf of GROUPEMECA. Therefore, GROUPEMECA's policy is to only associate with business partners who have requirements at a comparable level to its own regarding compliance and business practices.

GROUPEMECA is bound by strict procedures regarding quality and business practices. Working with business partners who do not adhere to the same high standards can damage our reputation and may jeopardize GROUPEMECA's responsibility due to their misconduct.

All GROUPEMECA employees must therefore make their business decisions based on objective criteria, such as price and quality, rather than personal relationships or interests. They must also proactively inform their hierarchical superiors of any circumstances that may impair their ability to impartially make decisions or take business actions on behalf of GROUPEMECA.

Quality and performance are at the core of our customers' satisfaction. That's why GROUPEMECA expects its suppliers to adhere to the specifications provided in the form of:

- → Orders;
- → Execution plans and/or associated normative documents;
- → Specific requirements documents and/or characteristics to which the product must conform;
- ightarrow And/or any other specific indications.

The supplier must notify in case of any changes to the products, processes, and/or manufacturing site, in order for these changes to be qualified. Any modification must be submitted for approval in advance.

Questions and concerns

All employees of GROUPEMECA are encouraged to turn to their hierarchical superior for any questions they may have regarding the above-mentioned rules, as well as for questions related to potential violations of applicable law, this code of professional conduct, or other internal rules. Concerns regarding criminal offenses or other serious incidents such as anti-competitive practices, corruption, discrimination or harassment, financial misconduct, or practices that may expose individuals or the environment to **risks** can also be reported to the email addresses below:

p.schaaps@groupemeca.com

j.papart@ groupemeca.com

The organization ensures its employees the opportunity to **report any concerns** confidentially. All reports are taken very seriously and will be investigated. Retaliation measures, in any form, against employees who have made such a report are strictly prohibited. All employees with relevant responsibilities must:

- → Ensure that reference data regarding all parties involved is recorded correctly and completely to enable appropriate screening;
- → Never attempt to circumvent regulations on economic and financial sanctions;
- → Inform the Management Committee if they suspect a violation by a customer or another business partner of the regulations in force on economic and financial sanctions.

Reporting system

GROUPEMECA has established a reporting system (see contact form for informants) allowing employees, business partners, and third parties to confidentially report any suspicion of wrongdoing or offense of a comparable level of severity. On all these matters, employees, clients, business partners, and third parties can contact:

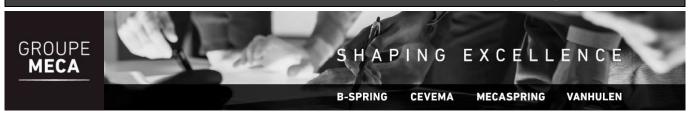
p.schaaps@groupemeca.com

j.papart@ groupemeca.com

All complaints will be handled with complete confidentiality.

Code of conduct - Contact form for informants GROUPE **MECA** SHAPING EXCELLENCE **B-SPRING** MECASPRING **VANHULEN CEVEMA** Subject About me Company Title (Mr. – Mrs. – other) First Name Last Name Email Address (optional) City (optional) Phone number (optional) My message I would like to schedule a **meeting** for a personal discussion: Yes 🗆 $No \square$ Others (optional)

Code of conduct - Rules of confidentiality



Dear Visitor(s),

I would like to remind you of some rules of good conduct regarding confidentiality.

As the CEO of GROUPEMECA, I am personally and contractually obligated within the framework of protecting client and partner data, to take all appropriate technical and organizational measures to prevent third-party access to the documented and confidential information entrusted to our various entities, regardless of the medium.

Confidential Information includes, but is not limited to:

- \rightarrow The strategy, costs, prices, information on customers and suppliers, contractual terms relating to the Company's customers and suppliers;
- → All drawings, formulas, quotations, books, software, instruction manuals, periodic reports, meeting minutes, logs and accounts, activities, trade and manufacturing secrets, oral or written data regarding or not the activities, methods, technical procedures, or equipment of the Company and/or any other company within the group to which the Company belongs;
- → The identity of current and potential clients, suppliers, distributors, and service providers of the Company and/or any other company within the group to which the Company belongs, and any other information related to these clients, suppliers, distributors, and service providers;
- → Any element of any nature whatsoever (organizational, technical, functional, visual, textual, graphic, strategic, commercial, economic, or otherwise).

It is our responsibility towards our clients and partners to secure all this data, which is the property of GROUPEMECA.

For the above stated reasons, I commit to taking all necessary legal corrective measures against anyone who violates these rules of good conduct regarding the confidentiality.

Thank you,

Herstal, August, 21 2023

Pierre Schaaps CEO GROUPEMECA Ref: PS351023

For agreement, The Visitor(s):

Company represented:

Code of conduct – Fraudulent activities Nadcap requirements – CEVEMA site

The reputation of a company is one of its greatest assets as it establishes trust with employees, clients, and business partners. Wherever the organization operates, it is of the utmost importance that we comply with all applicable laws and regulations and strictly adhere to Nadcap requirements regarding fraudulent activities.

Every employee of GROUPEMECA is required to adhere to the principles outlined in this code, including entities that do not currently have Nadcap accreditation, namely: Mecaspring, Vanhulen High Precision Springs, and B-Spring. Your actions not only affect your reputation and image; non-compliance with these rules can also lead to further serious damages and loss of trust from our employees, clients, and business partners.

In accordance with the requirement, fraudulent activity is defined as deception, cheating, specialized practice, breach of trust, intentionally perpetrated to gain an unfair or dishonest advantage. This includes but is not limited to falsification of information, intentional omission, false pretenses, and deliberate misuse of qualified resources or certifications/qualifications/authorizations.

Nadcap makes a distinction between fraudulent activity and unethical behavior.

Fraudulent activity can occur at any level of the organisation:

- → Management;
- → Initiated by a worker.

Examples of fraudulent activities:

- → Intentional misrepresentation of test results;
- → Intentional omission of a production step;
- \rightarrow Use of a personal visa by an unauthorised person.

Examples of activities considered not to be fraudulent:

- → Accidentally transpose figures when declaring data;
- → Isolated incident of accidental omission of a process step.

Reasons why the organisation might commit fraud:

- \rightarrow The company may be under pressure to increase production and reduce costs;
- → It can also be associated with a lack of moral responsibility or work ethic;
- → Or perhaps individuals or companies do not fully understand the impact of fraudulent behaviour.

Consequently, as GROUPEMECA employees, it is our responsibility to report any suspicion or observation of fraud. To do this, the organisation has set up a reporting system (see contact form for informants).

On all these subjects, employees, customers, business partners and third parties can contact:

p.schaaps@groupemeca.com

j.papart@ groupemeca.com

All suspicions or reports of fraud will be treated in the strictest confidence.



Fraud - Contact form for informants GROUPE **MECA** EXCELLENCE **B-SPRING** MECASPRING **VANHULEN CEVEMA** Subject About me Company Title (Mr. – Mrs. – other) First Name Last Name Email Address (optional) City (optional) Phone number (optional) My message I would like to schedule a **meeting** for a personal discussion: Yes 🗆 $No \square$ Others (optional)



B-SPRING

Begovača b.b. 80101 Livno (Bosnia and Herzegovina) +387 34 242 074

CEVEMA

Dellestraat 26 3560 Lummen (Belgium) +32 13 530 680

MECASPRING

Prolongement de l'Abbaye 86 4040 Herstal (Belgium) +32 4 240 55 70

VANHULEN

Rue Haute Claire 3 4040 Herstal (Belgium) +32 4 289 99 99

www.groupemeca.com