

Qualifyze

Code of conduct



INTRODUCTION

Qualifyze Values

1. Get It Done
2. Embrace Radical Honesty
3. Exceed Customer Expectations
4. Drive Pragmatic Excellence

The Scope Of The Qualifyze Code Of Conduct

Applicability of this Code of Conduct
The role of Qualifyze Leadership
The role of Qualifyze's employees and Stakeholder/s
Failure to comply with the Code

Making Good Decisions

Do the Right Thing
Stop and Think
Seek guidance and collaboration

Qualifyze Work Environment: Safeguarding Well-Being And Human Rights

Respectful and Safe Work Environment
Promoting equal opportunities, diversity and inclusion
Human Rights

Upholding Ethical Business Practices

Prevention of Corruption and Bribery, Anti-money laundering
Avoidance of Conflict of Interest
Practice of fair competition

Corporate Social Responsibility And Sustainable Development Qualifyze Audits Quality

Our commitment to providing the excellent third-party audit services
Integrity and impartiality policy

Qualifyze Data And Assets

Data protection and Cybersecurity
Intellectual and proprietary information
Confidentiality
Managing our external communication

Empowering Voices: Speaking Up And Reporting

Introduction

At Qualifyze, we are dedicated to building the trust layer for global supply chains, turning compliance into meaningful value with human relationships at its core.

Our vision is to lead and transform the pharmaceutical supply chain, setting unparalleled standards in efficiency, compliance, and innovation while conducting our business ethically and with the utmost respect to laws and regulations.

In order to uphold the principles that define Qualifyze, we present our Code of Conduct. This Code is not just a set of rules; it is a testament to our collective commitment to ethical business practices. It guides us in fostering an environment where trust, respect, and ethical behavior are not only encouraged but expected.

This Code is crucial for several reasons:

- **Ethical Business Practices:** it embodies our dedication to integrity and honesty in all our operations.
- **Trust and Confidence:** adherence to this Code reinforces the trust and confidence our clients and partners place in us.
- **Positive Workplace Culture:** it contributes to creating a workplace that values diversity, inclusivity, and continual improvement.
- **Legal and Regulatory Compliance:** we are committed to strict adherence to all relevant laws and regulations.

In essence, this Code of Conduct is a living document, reflective of our values and shared commitment to ethical business practices. By embracing this commitment, we contribute to the creation of a workplace that not only meets the highest standards but also fosters an environment where individuals and teams can flourish.

Together, let us embody the spirit of Qualifyze – driving innovation, setting industry standards, and building a future where the pharmaceutical supply chain stands resilient, transparent, and responsive to the needs of our rapidly evolving world.

Qualifyze Leadership

Qualifyze values

At Qualifyze, we believe in fostering a workplace culture that aligns with our core values, which serve as guiding principles for the company. These values not only define who we are but also shape our journey toward a better tomorrow.





Get It Done

You believe in ownership and following through on our commitments. You execute on what matters most for Qualifyze, asking yourself “How can we solve this?” - and then you make it happen.



Embrace Radical Honesty

You give and welcome direct, thoughtful feedback - early, clearly, and always with the intention to learn and grow. You challenge other colleagues respectfully and with care.



Exceed Customer Expectations

You always consider your internal or external customers' perspective and needs when you make decisions. You continue to power our own growth by anticipating what future customers need.



Drive Pragmatic Excellence

You deliver consistent, high quality work that creates measurable impact. You collaborate with others to intentionally balance speed, precision and efficiency for what you need to achieve. You don't compromise on standards, but you are also able to keep the balance between “done” and “perfect”.

The scope of the Qualifyze code of conduct

This [Code of Conduct](#) (“Code”) has been drafted with the intent of creating a [workplace where trust, respect, and ethical behavior are essential part of our daily work](#). It serves as a guide to align our actions with the values that define Qualifyze, fostering an environment where employees, collaborators, clients, business partners and other stakeholders can have confidence in the integrity of our organization.



In essence, this Code is not merely a set of rules; it's a [reflection of our collective commitment to ethical business](#). It is written in accordance with best practices specific to the industry in which Qualifyze operates. It is based on applicable legislation, [the OECD's Guidelines for Multinational Enterprises](#), and [the ten principles of the United Nation Global Compact \(UNGC\)](#).

By embracing these principles, together we are contributing to a workplace that thrives on empowerment, collaboration, simplification and the constant pursuit of excellence.

Applicability of this Code of Conduct

We extend this guidance to Qualifyze's employees and directors, auditors, clients, business partners, suppliers and any third party acting on behalf or collaborating with Qualifyze ("Stakeholder/s") in every country and jurisdiction where Stakeholder/s operate.

We encourage everyone representing our interests to act with integrity, ensuring that our behavior reflects the values detailed in our Code, fostering a collective commitment to ethical conduct across all aspects of our engagements.

The role of Qualifyze leadership

At Qualifyze, leadership plays a key role as the guardian of conducting ethical business. It is the responsibility of our leaders to ensure compliance with the Code of Conduct, fostering a workplace culture rooted in integrity and accountability.

Our leadership actively promotes the principles set out in the Code, establishing a leadership model that prioritises ethical considerations in all decision-making processes. Their commitment to leading by example is evidenced in their daily actions, setting a standard that resonates throughout the organisation.

In addition to enforcing and promoting ethical standards, the leadership is committed to continuous improvement. Our leaders are taking initiatives that adapt our ethical framework to changing circumstances, reinforcing Qualifyze's commitment to ethical business.

The role of Qualifyze's employees and Stakeholder/s

As stewards of Qualifyze's commitment to ethical business practices, each employee and Stakeholder/s is entrusted with crucial responsibilities that form the base of our organizational integrity. Compliance with this Code of Conduct is an integral part of everyone's job.

Here are the three core responsibilities:

1. Familiarize yourself with the Code

Understanding the foundations of ethical behavior starts with familiarizing oneself with our Code. This document serves as a compass, outlining the principles and values that guide our actions. We expect each employee and Stakeholder/s to invest time in exploring the Code, as it forms the basis for ethical decision-making within the Qualifyze community.

2. Adhere to the Code

Following the Code is not just a requirement; it is a fundamental responsibility. Each employee and Stakeholder/s is expected to integrate ethical considerations into their daily work, ensuring that their actions align with the values outlined in our Code. This adherence is a reflection of our collective commitment to maintaining the highest standards of integrity in every aspect of our professional lives.

3. Lead colleagues in promoting an Ethical Work Environment

Beyond individual responsibility, Qualifyze's employees are encouraged to take a leadership role in fostering an ethical work environment. Leading by example, promoting open communication, and encouraging ethical decision-making among colleagues are vital contributions to our shared commitment. Actively engaging in discussions and addressing concerns constructively contribute to the cultivation of a workplace culture defined by trust, respect, and integrity.

Failure to Comply with the Code

All Qualifyze's employees [must understand and adhere to this Code of Conduct](#) and all the applicable laws related to their position. [Qualifyze takes a zero-tolerance approach to non-compliance with this Code](#), therefore failure to comply with the Code shall result in appropriate disciplinary actions for Qualifyze's employees. Breaches shall be taken seriously, and consequences for non-compliance may include but are not limited to warnings, retraining, suspension, or, in severe cases, termination of employment.

[Non-compliance with the Code of Conduct by any of Stakeholder/s can result in loss of business opportunities](#), immediate termination of business relationships without the right to financial compensation, as well as potential legal consequences, if applicable.

These measures underscore our commitment to upholding the values and standards outlined in our Code, ensuring a workplace and business environment characterized by ethical conduct and mutual trust.



Making good decisions



Do the Right Thing

We emphasize the importance of “doing the right thing” when making business decisions. This principle goes beyond mere compliance with this Code or any applicable laws or rules; it calls for a commitment to actions that align with our values and reflect the ethical standards we identify with.



Stop and Think

In challenging situations, we advocate for the practice of “stop and think.” Before taking any action, Qualifyze’s employees are encouraged to pause and analyze their own actions as well as those of others. This allows for a thoughtful examination of potential consequences, ensuring that choices made align with our values and organizational culture.



Seek Guidance and Collaboration

Recognizing that ethical decision-making can be complex, we encourage our employees to seek guidance when in doubt. If uncertainties arise, employees are empowered to reach out to their work colleagues or managers. Our leadership team, People team and Legal team is always available to clarify any doubts about Qualifyze guidelines. Open and ongoing communication is fundamental in navigating ethical challenges.

Qualifyze work environment: safeguarding well-being and human rights

At Qualifyze, we are committed to fostering a [workplace culture that promotes respect, integrity and honesty](#), providing equal opportunities for all. Our dedication to creating a [diverse and inclusive environment](#) is fundamental to our values. We are an organization with people from many different cultures, backgrounds, and lifestyles, and we believe that every individual, regardless of their origin or identity, deserves to be treated with dignity and fairness.



Respectful and Safe Work Environment

We expect all Qualifyze's employees to contribute to a respectful work environment. This means treating colleagues, clients, and any other Stakeholder/s with courtesy, understanding, and consideration. Discrimination and harassment, or any form of disrespectful behavior, is not tolerated. We encourage open communication, active listening, and the valuing of diverse perspectives to create a harmonious workplace for everyone. We expect all Qualifyze's employees to respect the diversity of viewpoints and beliefs, so as to maintain understanding and empathy during discussions and express their opinions in a professional manner.

Ensuring employees' well being includes caring about the health of everybody in our organization. That is why we take the required measures to prevent work-related accidents and illnesses and create a safe and comfortable environment where employees are provided with optimal working conditions.

Promoting Equal Opportunities, Diversity and Inclusion

We believe in providing equal opportunities for all Qualifyze's employees, based on merit and qualifications. Our hiring, promotion, and development processes are designed to be free from bias and

discrimination. Qualifyze is dedicated to creating a workplace where individuals from diverse backgrounds can thrive and contribute their unique skills and perspectives. We celebrate the differences that make each individual unique and we are committed to creating an inclusive environment where everyone feels valued, heard, and respected.

Human Rights

Qualifyze is committed to upholding and respecting the fundamental human rights of our Qualifyze's employees and Stakeholder/s. Our commitment is based on internationally recognized standards and principles, in particular the United Nations (UN) Guiding Principles on Business and Human Rights, UN Convention on the Rights of the Child (1989) and the International Labour Organization Minimum Age Convention No. 138 (1973). We respect the freedom of association rights of our employees and the right to representation by trade unions, and we adhere to standards of employment and industrial relations, as well as local equality regulations in the countries where we operate.

This commitment extends to our clients and business partners. We expect them to act in accordance with the law and observe appropriate social and legal standards, particularly in the areas of human rights, child welfare, the treatment of employees, equal opportunity, the right of association, health and safety at work, as well as wages and social benefits.

Upholding ethical Business practices



Prevention of Corruption and Bribery, Anti-money laundering

At Qualifyze, we aim at [becoming a leading pharmaceutical supply chain](#), setting unparalleled standards in performance, compliance and innovation. To achieve this, we seek profitable business deals - [but not at any cost](#).

[We are committed to conducting business ethically and professionally in compliance with all applicable anti-corruption laws, rules and regulations.](#)

[We have zero tolerance for bribery and corruption.](#) We do not offer or accept improper payments and we do not tolerate improper payments by third parties working on our behalf.

In particular, Qualifyze's employees and Stakeholder/s are not allowed, directly or indirectly, to offer, promise, give, demand or receive bribes or other improper advantages to obtain or retain business or other improper advantages. Reciprocally, no Qualifyze's employee or Stakeholder/s is allowed to enter into business relationships where Qualifyze is likely to be solicited or expected to render

a bribe or other improper advantage.

This prohibition extends beyond providing improper advantages to representatives of private commercial companies with which we do business, and the public representatives and government officials, for example, civil servants, employees of public authorities, and politically involved persons.

While we discourage improper advantages, small and customary gifts, such as small promotional gifts, invitations to a business meal, or gifts on birthdays, are fully acceptable, as long as they do not involve cash or cash-equivalent gifts exceeding the amount of 50 euros. Furthermore, they shall not be associated with a business decision.

Any doubts or concerns related to bribery and corporate gifts can be consulted by Qualifyze's employees and Stakeholder/s at any time, through any of the company's communication channels available, including the [Whistleblowing Channel](#).

We do not finance terrorist and we do not engage in any way into money laundering. As an international company, we observe all relevant economic sanctions and comply with all restrictions imposed under foreign trade law. No employee of Qualifyze is permitted to do business with any individual, company, or organization associated with terrorism or drug trafficking or whose funds are derived from criminal activity.

Avoidance of Conflict of Interest

We are committed to maintaining a clear distinction between personal interests and those of the company. While conflicts of interest may arise, we prioritize transparency and resolution. In this respect, we expect our employees and Stakeholder/s to refrain from any activity that could conflict with their responsibilities to Qualifyze and may jeopardize impartial business decisions.

Conflicts of interest may arise if an employee or Stakeholder/s' actions or interests make it challenging to perform their work objectively. By way of illustration, some situations that could cause a conflict of interest include but are not limited to: having an investment in a company that competes with Qualifyze, providing similar services for direct competitors, or providing consulting services related to those provided to Qualifyze.

Conflicts can also occur if an employee or any family member receives inappropriate personal benefits due to their position or use of company information. Additionally, our employees should steer clear of relationships, investments, or opportunities that conflict with Qualifyze's best interests.

When such a situation occurs, our employees and Stakeholder/s are expected to abstain from influenced decisions and disclose the conflict of interest directly to their managers or by using Qualifyze's [Whistleblowing Channel](#).

Practice of Fair Competition

We promote effective competition as standard practice and adhere to national and international competition laws and regulations. Our commitment includes refraining from entering into agreements or arrangements with competitors that could hinder fair competition. Specifically, we avoid any involvement in price agreements, market sharing arrangements (such as dividing them by sales territory, customer, or products), or agreements related to other market practices and business strategies. We do not engage in unfair calls for boycotts and we are vigilant about avoiding discrimination against competitors, whether in the sale or purchase of goods and services.



Corporate social responsibility and sustainable development

As an online business, [our direct impact on the environment in terms of emissions or waste generation may not be significant](#), but we acknowledge our responsibility to contribute to a healthier, more sustainable world.

In minimizing our direct environmental impact, we actively integrate renewable energy sources into our operations, implement recycling initiatives, and strive to reduce the carbon footprint associated with corporate travels and activities.

Beyond environmental responsibility, we are committed to fostering social and economic sustainability. This includes promoting diversity, equity, and inclusion in our workplace, supporting fair labor practices throughout our value chain, and engaging in responsible sourcing.

We strive to contribute positively to the communities in which we operate and remain committed to identifying new ways to reduce our impact and enhance sustainability across our business activities.



Our Commitment to providing the Excellent Third-Party Audit Services

At Qualifyze, we are committed to providing our clients with excellent third-party audit services and to achieve this goal successfully we have implemented a Quality Management System (QMS) based on ISO 9001, which supports our services within the highly regulated sector in which we operate. Risk-based thinking is part of our DNA.

We ensure that all personnel of Qualifyze, as well as any third party acting on behalf of or collaborating with Qualifyze in providing audit-related services, are competent and possess sufficient training and experience in the QMS to proficiently carry out their assigned duties. Furthermore, we ensure continuous quality oversight of all our activities and are consistently seeking for improvements.

This allows us to constantly improve our overall performance, meet our customers' expectations and enhance their satisfaction.

Integrity and Impartiality Policy

We recognise that impartiality is the foundation of our audit services, essential to maintaining the integrity and credibility of our operations. Our commitment to impartiality is set out in



our annually reviewed policy, designed to ensure the objectivity of our audit processes and company operations, instilling confidence in the honesty and integrity of our services among all stakeholders.

Our audit activities are conducted with absolute impartiality, undertaking to the impartiality requirements of ISO17020:2012 and leaving no room for doubt about the objectivity of our judgements.

Decisions related to our audits, whether made internally or by qualified auditors, are strictly based on objective evidence. We are not subject to commercial constraints or external pressures.

We conduct regular risk assessments that cover both internal and external factors affecting our ability to provide impartial audit services. Our comprehensive assessment identifies organizations or individuals that pose a risk to our independence, impartiality and integrity.

We actively monitor and conduct regular reviews to identify and resolve conflicts that may arise, ensuring that we continually maintain our commitment to impartiality. This vigilance extends to any organization or individual that could potentially compromise our integrity.

In the pursuit of audit excellence,

auditors conducting Qualifyze's audits are duty-bound to maintain high standards of behavior marked by honesty and integrity. This commitment extends to their professional conduct and interactions with audited entities. They are expected to act with complete autonomy from any influences that could compromise their judgment, that encompasses avoiding financial interests, relationships or situations that could adversely affect their objectivity. In order to reinforce this commitment, all auditors conducting Qualifyze's audits are subject to specific rules contained in the Qualifyze Auditor Code of Conduct.



Qualifyze data and assets



Data protection and cybersecurity

We recognize the [importance of data protection laws](#) in preserving the personal rights of our customers, users, business partners, employees and collaborators. It is the responsibility of each of us to handle personal data responsibly, ensuring that there exists a legal basis for processing such information and minimizing the use of such data.

We transparently inform our users and customers as well as our employees about all relevant [information regarding data protection](#). We explain, in particular, [who is the controller for their data, why we collect their data and which legal basis we rely on](#), which kind of data we collect, who will be the recipients of their data, how we protect their data, and how they can control the data we have from them. This information is provided in our [Data Protection Declaration](#) available on our website.

In recognizing the critical role that cybersecurity plays in fostering trust among users, business partners, and employees, we acknowledge that the data we process holds substantial value and can be susceptible to various threats. Each individual at

Qualifyze is responsible for adopting security measures to shield this data against cyber threats, including destruction, theft, unauthorized access, unlawful disclosure, or other forms of misuse.

Additionally, our employees are vital in maintaining cybersecurity vigilance, by actively contributing to the prevention of misuse and improper use of our IT systems on a daily basis. This applies especially when working from home or teleworking. We therefore use secure passwords and other authentication factors. We take care to ensure the authenticity of email senders, other communication formats, and their content. Furthermore, we only use licensed software.

As a general rule, we use the company's hardware and software to achieve our business objectives and do not use them for inappropriate personal or illegal purposes.

To further demonstrate our commitment to information security, Qualifyze is SOC 2 Type II ISO 27001 certified, reflecting our adherence to internationally recognized standards for data protection and cybersecurity.

Intellectual and Proprietary Information

We [recognize the pivotal role of intellectual property rights](#) as valuable assets to our business. This encompasses trademarks, copyrights, and trade secrets, collectively contributing to our innovation and competitiveness in the market. All Qualifyze's employees and Stakeholder/s share the responsibility of safeguarding Qualifyze's intellectual property rights.

Qualifyze [respects the intellectual property and proprietary information of others](#) by providing necessary software under appropriate licensing agreements with vendors, allowing Qualifyze's employees and Stakeholder/s to perform their functions adequately.

We are aware of the importance of the intellectual data we process in connection with the audits we perform and reports we prepare, which is why we make the greatest efforts to ensure that this information is properly protected. We always make sure that the contracts entered into in the context of audits contain clauses regarding the protection of the auditees' intellectual property.

Confidentiality

Confidentiality is an integral part of our business. We [maintain stringent](#)

[confidentiality standards for the audit-related information](#), including proprietary details of the entities under examination. This encompasses refraining from divulging findings or business data to unauthorized parties. To ensure the secure handling of information, we employ proactive measures for both physical and digital record/keeping, limiting access exclusively to authorized personnel.

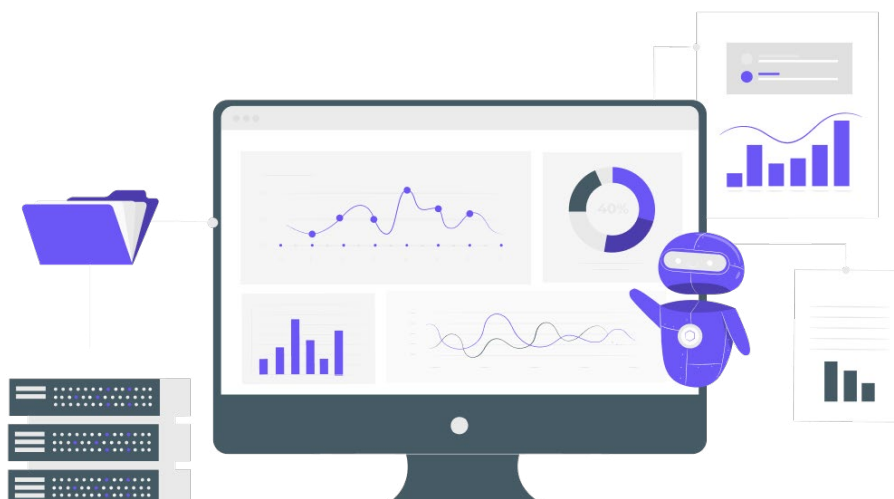
Our [commitment to protecting proprietary information](#) of examined companies extends beyond employment or collaboration termination, governed by relevant post-contractual clauses in our contracts.

Managing our External Communication

Our success is closely linked to the [trust of Stakeholder/s to provide clear, accurate and consistent information at all times](#). This commitment to responsible communication is a shared responsibility, and every person at Qualifyze plays a key role in maintaining these high standards. We emphasise the importance of recognising the impact of our own words and [respecting the privacy of colleagues and business partners](#).

Every Qualifyze's employee and Stakeholder/s has a responsibility to uphold the reputation of our organisation. As such, it is imperative to refrain from disclosing any confidential information when using social media and, in particular, to refrain from spreading offensive or defamatory content.

In essence, our communication strategy reflects a dedication to responsible and thoughtful interaction. This commitment ensures that Stakeholder/s consistently receive reliable and trustworthy information, [contributing to a transparent and positive business environment](#).



Empowering voices: speaking up and reporting misconduct

Every Qualifyze's employee and Stakeholder/s who have concerns related to application of this Code or suspect a potential violation of the Code or commitment of any other legal or compliance breaches, is [encouraged to speak up](#).

At Qualifyze, we firmly believe in [fostering a culture of open communication and continuous feedback](#), therefore, we strongly encourage our employees to contact their managers in the first place and report any doubts.

Apart from the direct reporting method Qualifyze's made available [Whistleblowing Channel](#). It enables any of Qualifyze's employees and Stakeholder/s or any third party that becomes aware of any misconduct or irregularity within the company, to [confidentially and anonymously report any suspected unethical behavior, legal violation, or an activity that may compromise the well-being of our workplace](#).

Reports are [received by our Case Managers](#) who have been entrusted by Qualifyze with providing insightful solutions to any compliance concerns, in an efficient manner.

We are committed to take no direct or indirect reprisals against anyone reporting an irregular action in good faith, while also [protecting the rights of the person subject to investigation](#). Any retaliatory actions taken shall be subject to disciplinary measures.

Our comprehensive guidelines for speaking up and addressing ethical concerns are thoroughly outlined in the [Whistleblowing Channel SOP](#).

Your willingness to speak up and dedication to uphold the reporting process provide Qualifyze with the opportunity to demonstrate our commitment to integrity and responsibility, as well as being able to promptly address issues as they arise.

Qualifyze

Code of **conduct**

September 2025