

CODE OF CONDUCT OF SUPPLIERS AND BUSINESS PARTNERS

V3 March 2025

The Echosens Group (Echosens SA and its subsidiaries) adheres to the highest standards in the conduct of its business and pays particular attention to respect for human rights, social rights and environmental protection.

Therefore, Echosens' social and societal responsibility includes a proactive policy aimed at protecting the environment, respecting human rights, particularly in responsible purchasing, promoting ethics in its business relations and fighting corruption.

Scope: In accordance with its principles of action, Echosens expects each of its suppliers, their parent companies, subsidiaries and affiliated entities, employees – temporary or otherwise – as well as the suppliers' subcontractors and own suppliers and any person having a business relationship with Echosens, hereinafter referred to as the "**Business Partners**", to comply with the principles set out in this "Suppliers and Business Partners Code of Conduct".

By expressly accepting this Code of Conduct, each Business Partner undertakes, in consultation with Echosens and their stakeholders:

1. To review the most appropriate means of applying these principles and to inform Echosens of the measures implemented;
2. To define precise, quantified target objectives (e.g. in terms of reducing greenhouse gas emissions, waste management, reducing work-related accidents, etc.), precise indicators for measuring the achievement of these objectives, and procedures for monitoring and implementing corrective measures;
3. To include in its contractual relations with Echosens and with its own suppliers and subcontractors similar contractual mechanisms in line with Echosens' objectives;
4. Ensure that the same approach is applied to their own suppliers;
5. Inform Echosens – within a timeframe to be defined with Echosens – of the progress and difficulties encountered, so that measures can be put in place with all stakeholders to achieve the agreed objectives.
6. Inform Echosens without delay of any practice contrary to the objectives of this Code and/or the relevant regulations and of the corrective measures put in place.

This Code of Conduct is regularly updated. The applicable version is dated from March 1st, 2025.

COMPLIANCE WITH LAWS AND REGULATIONS

Business Partners undertake to comply without restriction with all applicable laws, regulations and international conventions, as well as reference principles and standards, such as the OECD guidelines, concerning in particular:

- Human, labour and social rights (OECD, ILO standards, etc.)
- Respect for the environment
- Business ethics practices, contribute to the fight against corruption of any kind, compliance with competition law and international trade rules, in particular customs legislation
- Protecting natural resources
- Information and data protection.

HUMAN, LABOUR AND SOCIAL RIGHTS

In accordance with the principles of the United Nations Global Compact, the Declaration of Human Rights, the guidelines of the International Labour Organization and its own ethical principles, Echosens asks its Business Partners to:

- Promote and respect the protection of international human rights law;
- Not take part in any human rights abuses;
- Respect freedom of association and recognise the right to collective bargaining;
- Contribute to the elimination of all forms of forced and compulsory labour and human trafficking. Business Partners undertake to comply with all applicable regulations and to implement all necessary measures to prevent illegal, clandestine and undeclared work;
- Contribute to the effective abolition of child labour;
- To contribute to the elimination of all forms of discrimination in respect of employment and occupation. All workers are treated equally and fairly;
- Guarantee that all employees are treated with respect and dignity. They work in an environment free from any form of harassment;
- To commit to fair and equitable remuneration practices, and to comply with all applicable local laws and regulations regarding the working hours of its employees.

Health and safety in the workplace

Considering that all employees are entitled to a safe and healthy working environment, without risk of violation of their professional integrity, Business Partners undertake to apply the laws and rules relating to the protection of the health and safety of their employees, and to guarantee the safety of Echosens personnel on their sites.

Business Partners undertake to implement and maintain an occupational health and safety policy or, where applicable, a safety management system. Each Business Partner also agrees to monitor the number of work-related accidents and to take all necessary measures to reduce this number.

RESPECT FOR THE ENVIRONMENT

Echosens' Business Partners agree to conserve natural resources and biodiversity, and to structure both their activities and their supply chain in such a way as to avoid or minimise negative impacts on the environment (greenhouse gas and pollutant emissions, implementation

of repair, reuse, recycling, revalorisation processes, waste reduction, etc.) and to implement circular economy principles, while striving to continuously improve their products, processes and services to make them more environmentally friendly.

ETHICAL BUSINESS PRACTICES

Echosens' Business Partners undertake to comply with the principles described below and to ensure that their suppliers and subcontractors also comply with them. They agree to implement a compliance programme aimed at detecting and preventing corruption, including internal rules prohibiting and punishing corruption, an employee awareness campaign, third-party evaluations and appropriate control systems.

The fight against conflicts of interest

Echosens employees are required to avoid any situation that involves a conflict between their personal interests and the interests of Echosens. It may constitute a conflict of interest for an employee to work simultaneously for a client, a supplier or a competitor, as well as to hold a significant interest, directly or indirectly, in the latter. Echosens expects its Business Partners to comply with these principles in all respects when they are in contact with Echosens employees.

The fight against corruption

Echosens' Business Partners are prohibited from granting, offering or giving any undue advantage in any form (including money or anything of value) directly or through an intermediary, to a private individual, an employee, or a representative of a government entity of any country in order to obtain preferential treatment or an advantage in the conduct of business, or to influence the outcome of a negotiation in which Echosens has an interest.

Echosens expects its Business Partners to take appropriate measures to prevent, detect and punish any act that directly or indirectly involves corruption or trading in influence within the scope of their activities.

No Echosens employee shall offer or accept any form of payment or remuneration to or from a Business Partner. Only gifts, invitations or advantages granted to or received from Business Partners which have no other purpose than to reinforce their brand image and maintain good commercial relations may be accepted. Their value must remain symbolic and in line with commercial practice and must not contravene local laws or regulations. Where applicable, they must be accepted in full transparency, remain occasional, offered outside any period of negotiation or competitive tendering, in a professional context and without expectation of consideration.

Compliance with international trade rules

Echosens asks its Business Partners to comply with applicable international trade regulations, including export controls, embargoes and sanctions, and to disclose any restrictions that may be imposed on the export or re-export of their supplies of products or services. Echosens asks its Business Partners to identify any part of the delivery or service subject to export regulations at the time of signing a contract or receiving an order, to modify this information in the event of a change in export regulations or classifications, and to provide Echosens with all information concerning applicable export regulations.

Trade restrictions and international sanctions

Business Partners shall comply with all applicable international trade restrictions and sanctions, as well as applicable import and export control laws and regulations, taking into account any changes thereto.

Non-use of conflict minerals

To each Business Partner: “Unless you declare otherwise, Echosens believes that you are not using any “conflict minerals” as defined by the Dodd Frank Wall Street Reform and Consumer Protection Act of 2010”.

Compliance with competition law

Echosens requires all its Business Partners to comply strictly with the laws on fair trading practices and competition laws applicable in the countries in which they operate. As a general rule, agreements or manoeuvres likely to restrict or distort competition or trade are prohibited.

In particular, price-fixing, abuse of a dominant position, manipulation of tendering procedures, allocation of markets, territories or customers between competitors, and boycotts or unequal treatment of certain customers or suppliers without good reason are prohibited. In addition, the exchange or disclosure of commercially sensitive information concerning competitors, customers or suppliers is prohibited.

Product quality

Echosens' reputation is undeniably based on the quality of its products and services. Echosens is committed to maintaining a reliable and efficient quality system that complies with worldwide requirements. Its production site based in Créteil (94000), France, complies with quality system regulations and is ISO 13485 certified.

Business Partners guarantee the highest quality of their products. They agree to sign and comply with the Quality Agreement provided by Echosens.

Confidentiality

Business Partners undertake to take all necessary steps to guarantee the confidentiality of professional secrets and other non-public information communicated or accessible within the framework of their business relationship with Echosens.

Respect for privacy and protection of personal data

Business Partners must comply with all applicable laws and regulations relating to privacy and the protection of personal data.

Intellectual property

Business Partners shall take all necessary measures to respect and ensure respect for the rights relating to Echosens' resources and assets, in particular all patents, trademarks, copyrights, know-how and industrial secrets.

Transparency of information

Business Partners must provide clear and accurate information as to the methods and resources used, production sites and characteristics of the products or services supplied, and must refrain from making any misleading claims.

APPLICATION OF THIS CODE BY BUSINESS PARTNERS AND THEIR OWN SUPPLIERS

For the avoidance of doubt, Business Partners undertake to ensure that their own suppliers and subcontractors, as well as any person under their responsibility, comply with the principles set out in this Code of Conduct.

Echosens reserves the right to verify compliance with the rules set out in this Code with each Business Partner as it sees fit: by means of a questionnaire or an audit carried out by Echosens or a third party. Echosens asks its Business Partners to provide complete and accurate information, including access to their documentation.

If a Business Partner fails to comply with the conditions set out in this Code, Echosens reserves the right, at its sole discretion, to terminate any commercial relationship with the Business Partner.

If a Business Partner does not comply with the conditions set out in this Code, it must inform Echosens and undertake, in good faith, to define and apply the necessary measures to ensure compliance with the commitments of this Code and, where applicable, the contractual clauses specifying it.

In the absence of corrective action or persistent non-compliance with the principles of the Code, notwithstanding the application of contractual mechanisms ensuring the application of the said principles, Echosens reserves the right, at its sole discretion, to terminate any commercial relationship with the Business Partner and to report any violations observed.

REPORTING SYSTEM

Echosens listens to its employees, customers, suppliers, Business Partners and all other stakeholders, and invites them to report any behaviour, at any level of its value chain, that is contrary to the principles of this Code or applicable regulations. To this end, Echosens has set up a whistleblower protection system.

With a view to maintaining the highest ethical standards in its activities, Echosens encourages its stakeholders, and in this case its Business Partners, to report any concerns about potentially unethical conduct or illegal activity to its partner **Safecall**: www.safecall.co.uk/report

Safecall is an independent external reporting line where the Business Partner can raise concerns and be assured that they will be fully addressed. All calls are handled confidentially by Safecall's qualified staff who will summarise the content of the call and send a report to the dedicated ethics unit for processing in accordance with the principles set out in the Sapin 2 French law (no. 2016-1691 of 9 Dec. 2016). Safecall respects the right to anonymity if so desired.