



Code of Ethics an Compliance in Business

Disclaimer

In this document, the reference to **the Agency** means, depending on the context, THE Q AGENCY and the companies that make it up, as well as any entity over which it has direct or indirect control, including the following entities: divisions, units, local or regional offices, subsidiaries as well as any partnerships, joint ventures, concessions and infrastructure consortia. This Code is an integral part of the contracts of the workers and collaborating partners of **the Agency** and is used exclusively in the internal environment of the Agency.

In developing the Code, the ethics and compliance material of a large international company, public material not subject to copyright, was used. Online publication or sale in any form of this document is prohibited.

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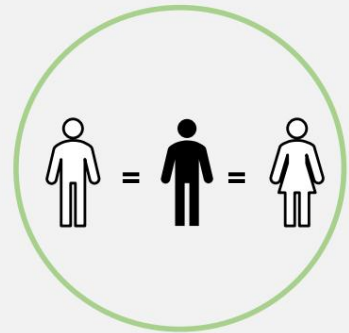
Agency Code – overview



1

application

The Agency Code applies to all its members



2

Discrimination

Discrimination and harassment are strictly prohibited



3

Violence

Strictly prohibited inside and outside the Agency



4

Prohibited substances

Alcohol and drugs are strictly prohibited



5

Environment

All members will apply environmentally sustainable practices



6

Bribes and "cautions"

Giving or receiving bribes is strictly prohibited for members of the Agency



7

Facilitation payments

Strictly prohibited by all
Agency members



8

Gifts and hospitality

Never accept or offer
money



9

Personal relationships

Strictly prohibited
between subordinates



10

Agency assets

It is strictly forbidden
to use the assets of the
Agency for personal purposes



11

Information protection

Personal information of
Agency members is
secured and protected



12

External communication

Members' opinions are
personal and should not
implicate the Agency

VALUES OF OUR AGENCY

Our values keep us constantly pro-active and determined to follow the best path. These values correspond to how we conduct our business activities, how we express ourselves as a group of companies and how we engage with all stakeholders so that we always inspire their trust.



RESPONSIBILITY AND SECURITY

We are responsible to any person who comes into contact with the Agency and therefore we have an obligation to protect them so that they always feel safe with us.

ETHICS AND CONFORMITY

We are permanently engaged in a substantial process of improving business ethics and conduct in our domestic, European and international market sector.

MAIN FOCUS ON OUR CLIENTS

We constantly evaluate the needs and desires of our customers in order to correctly understand what they want and offer them products and services that add value to them.

SUPERIOR PERFORMANCE FOR INVESTORS

The huge potential of the cognitive business sector in which we operate gives us the opportunity to reward investors' trust by delivering competitive returns.

EXCELLENCE IN THE ENVIRONMENT OUR BUSINESS

We are visionary, creative and innovative, competent, cooperative. For us teamwork means the power to deliver excellence in everything we do for others.

RESPECT UL IS CORE VALUE

In any circumstance, we show the proof of the respect we have to all those who work with us, those who collaborate with us or are our customers.

THE MESSAGE OF THE INVESTMENT AND DEVELOPMENT COUNCIL AND THE PRESIDENT OF THE Q AGENCY



Dear colleagues,

Thank you for taking the time to read THE Q AGENCY's Code of Business Ethics and Conduct.

Recently, we have made intensive efforts to develop an Ethics and Compliance Program whose standards correspond to current international requirements.

In a rapidly developing digital economy and a cognitive age that humanity has already entered, we want you, our colleagues, our customers and all other stakeholders to benefit and appreciate our program as the best in the business segment in which we operate.

As a business organization we focus on continuous improvement of performance, our Ethics and Compliance Program through its permanent evolution is no exception in this regard.

We are motivated by our values, we are motivated by the development of a business culture that stimulates transparency and that provides our employees, collaborating partners and clients with all the necessary tools to prevent, detect and respond to all issues that are related to ethics.

Our Code of Ethics and Business Conduct is one of the many tools we have created to develop and strengthen the Agency.

This code is designed to meet your requirements and needs and to ensure a professional and pleasant working environment in which to do your work.

Even though most of the decisions you make about ethics are based on your own judgment, sometimes there may be situations when the elements of a decision are unclear.

That's why the Agency Code provides clear answers for those more difficult decisions. And if, after consulting the code, the answer

still not clear ask your line manager or compliance officer who works for you.

The responsibility for adherence to this code and the exact application of its provisions rests with all members of the Agency, regardless of their position or status in the company.

We all have a duty to report in good faith all issues that arise in relation to ethics and conduct within and outside the Agency.

You, employees or collaborating partners, represent the voice of the values we have in the Agency and therefore we ask you to take the time to deepen and especially understand the Agency Code.

We are proud of the work we do to become ethics and compliance leaders in the domestic and international business sector in which we operate.

I thank you on behalf of the Strategic Council of the Agency's Founders but also personally for your commitment to operate with the highest qualitative ethical standards and for the desire to stimulate a work environment based on human integrity, transparency and ways of correct thing.

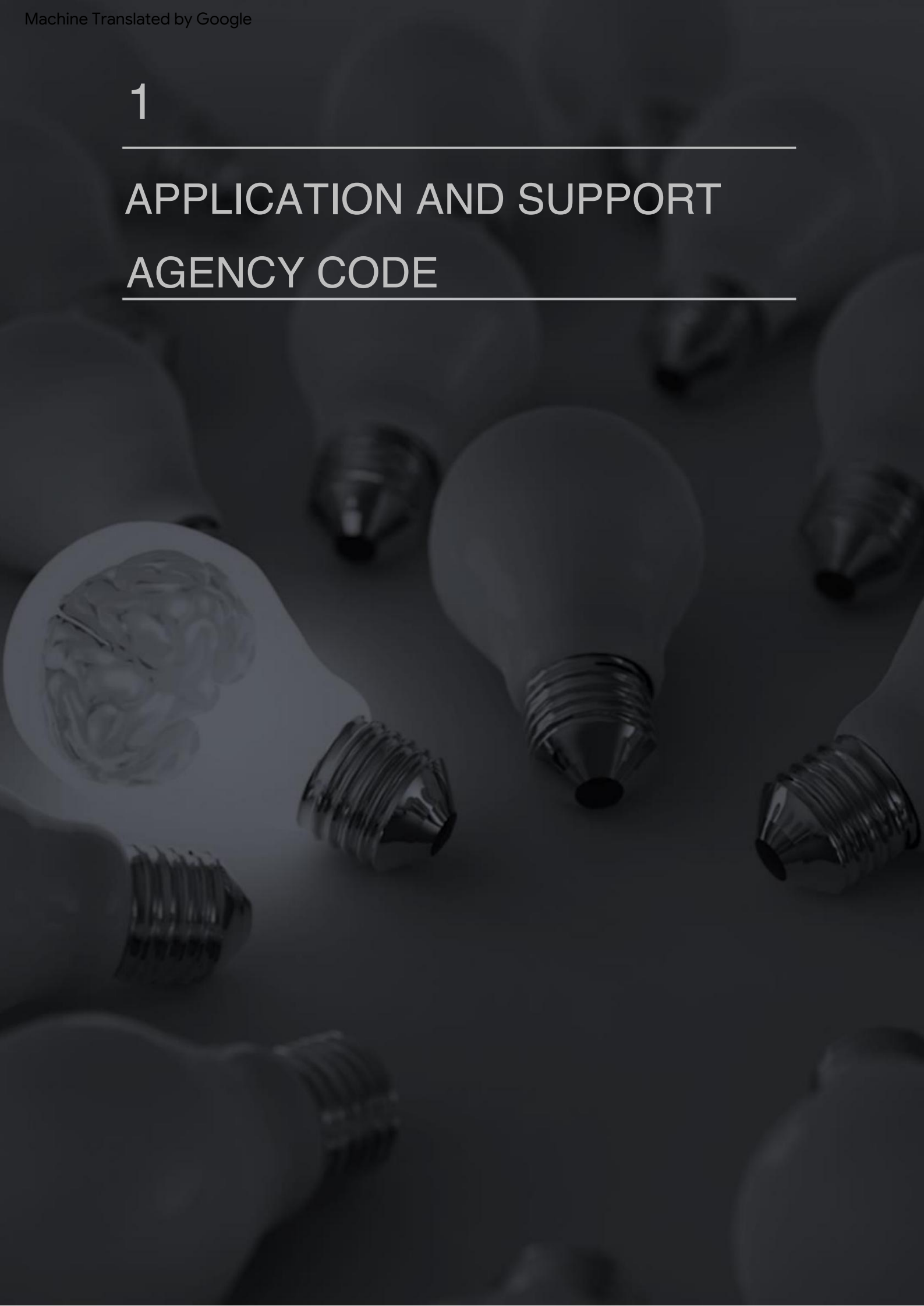
Thank you,

DANIEL DINU PhD

PRESIDENT AND GENERAL DIRECTOR

1

APPLICATION AND SUPPORT AGENCY CODE



1.1

The Agency Code involves us all

THE Q AGENCY Code of Ethics and Business Conduct promotes integrity and transparency in the work we do within the Agency and in our relationships with others outside of it.

Our Code applies to all Agency employees (permanent, casual, temporary, contract, full-time or part-time), consultants, leased staff, members of management and members of the Founders' Strategic Council (even if they are not in executive positions).

In this Code when we use the expressions "*our people*" or "*we*" we refer to all those who work in THE Q AGENCY.

As the Code is intended to be read by each member of the Agency in private some of the messages we send through this document will be addressed to you and therefore we will use the 1st person singular so that you can understand more Easy.

It is good to know that one of the necessary conditions for association in any form with THE Q AGENCY is the understanding and compliance with this Code, its fundamental policies and procedures.

It is included in the annex to the contract you will conclude with THE Q AGENCY or with any of the group companies.

Also, the application and compliance with the provisions of the Code is a very important criterion in the Agency for promotion to higher management positions when we talk about career.

The weight of compliance with the Code in the promotion decision that makes you eligible for occupying and maintaining a management position is **50%** business ethics and conduct and **50%** personal performance.

At the end of each year we will do an **assessment and certification process** together to ensure that this Code is understood and correctly applied in the daily work that each of us carries out within the Agency.

Obtaining inappropriate scores on the criterion of ethics and business conduct may lead to the termination of the collaboration contract regardless of the value of the performances you obtain in the current activity, considering that the reputation of the Agency and implicitly of its members takes precedence over the financial values obtained.

We also expect any third party with whom we do business to share our values and high standards of ethical conduct. We will use reasonable efforts to inform you of our expectations under this Code and to encourage you to adopt principles and practices comparable to ours.

Even though we have not collected all the rules and covered every possible situation with this Code, it has been created to help you use your own judgment and common sense, like all of us in the Agency, to make decisions. correct.

If you have doubts about a certain issue, please ask your direct manager or the Ethics and Compliance structure within the Agency for advice on that issue.

Our Code will be regularly updated and/or improved to reflect changes in laws and policies as well as best practices.

In case of updates and/or improvements we will always publish the latest version on our web pages. At the same time, we will also update the evaluation and certification process of THE Q AGENCY members.

After reading and understanding the Agency Code, you will be able to make one of two decisions:

- a) **accepting** and applying the Code, which also means signing the collaboration contract or
- b) **refusal** to apply the provisions of the code which means that there will be no contract and no commitment between us and you.

The acceptance of this Code of Ethics and Business Conduct is materialized by the signing on their own responsibility by each member of the Agency of a Declaration of Acceptance and Application that will be attached to the contract concluded with the Agency.

The Agency Code also applies to **natural persons** who perform **independent** activities and to **legal entities**, whose services are hired for a specific project or mandate and who issue invoices for services rendered to the Agency.

1.2

The legal provisions are respected with priority

The international activities that the Agency carries out create an obligation for THE Q AGENCY members to comply with the laws and regulations of the various jurisdictions in which we do business as a matter of priority.

The Agency's business will be conducted in accordance with all specific laws and regulations in force in the jurisdictions in which we conduct our business.

Any criminal behavior is strictly prohibited and will be punished accordingly.

Agency members will also take care to respect the customs, traditions or customs of the place where they carry out their business activities.

If in certain areas the laws and legal regulations in force allow certain behavior that does not comply with the provisions of the Code of Ethics and Business Conduct of the Agency the Agency Code shall prevail.

If there are any uncertainties regarding the application or interpretation of a law, a regulation or any other issue of an international legal nature, the members of the Agency have the obligation to consult

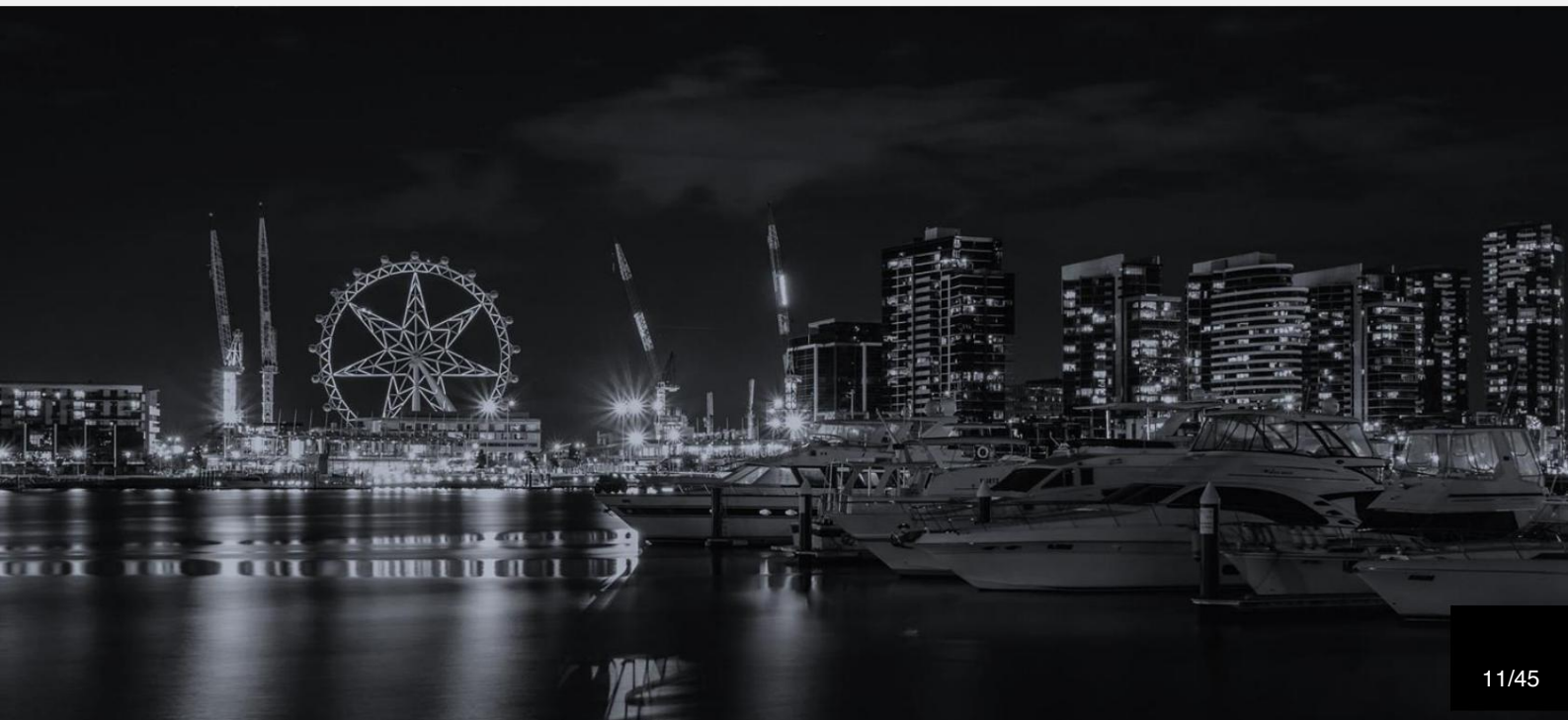
the legal department expeditiously before making a decision or initiating any action.

A member of the Agency who is seconded or relocated to another jurisdiction of a state must know the language, specific business customs, local customs and area.

Before going on a trip, it is necessary to contact the ethics and compliance structure, which will provide the necessary materials for information and preparation.

In the situation where the Agency member will be accompanied by family members, the ethics and compliance structure will take measures to inform and prepare the family members who will make the trip.

The purpose of information and preparation is to eliminate as much as possible the possible vulnerabilities that could hinder business activity and performance.



1.3

Violation of the Code of Ethics and Conduct

Failure to comply with the Code or its fundamental policies and procedures may result in disciplinary action up to and including termination of a director's contract or removal from the Board.

In any situation where the violation of the Agency's Business Ethics and Compliance Code is done by violating the law, the matter will be submitted to the competent authorities, who may subject the persons involved in the violation of the law to civil and/or criminal sanctions.

THE Q AGENCY reserves the right to take further action, including legal action, against

to the people who were involved and/or who benefited from illegal activities or contrary to the provisions stipulated in the Agency Code in order to recover any material, financial or moral damages caused to the Agency and any amounts or benefits that were incorrectly paid or received by the perpetrators .

1.4

The Responsibilities We Assume

Each member of the Agency, starting with the members of the Council and up to the newest employee, collaborator or partner, will assume the responsibility to comply with the provisions of this Code.

Our code is first and foremost a contract based on honor and responsibility. Because:

• we are all responsible for complying with the provisions of the Code and the annual process assessment and certification

• we are all responsible for being aware of the laws and legal provisions in the jurisdiction in which we work

• we are all responsible for ensuring that we understand and apply the policies and procedures relevant to the areas of activity in which the Agency operates

• we are all responsible for asking for advice or help from the resources available in the Agency whenever we are unclear.

• we are all responsible for reporting any violation, even potential, of the Agency's Code and/or its fundamental policies and procedures to higher levels.

• we are all responsible to cooperate fully and in good faith in the case of internal investigations carried out by the authorized persons of the Agency as a result of possible violations of the Code

• we are all responsible to act in all circumstances with integrity to maintain and promote, both personally and for the Agency, an excellent reputation in all activities carried out regardless of where we operate

• we are all responsible in giving due respect and help to other colleagues contributing to the enrichment of their experience but understanding at the same time that each of us can also enrich our experience through the respect received and with their help.

• we are all responsible for respecting human dignity which is the most important value of our Agency and which we must keep intact.

1.5

The expectations we have of managers

Our managers are responsible for applying inquiry-based leadership, promoting a culture of respect and dignity in a work environment that must always be positive.

These goals of additional responsibility that Agency managers have can be achieved by:

- the power of personal example and respect Agency Code at any time
- helping members of the teams they lead to understand and adhere to the standards, policies and practices stipulated in the Agency Code. Managers must also facilitate and monitor the participation of team members in training and certification sessions related to the application of the Code to ensure that they correctly understand the requirements.
- supporting and protecting people who, in good faith, raise concerns

or report potential unfair behavior even if doing so would remove those individuals from the chain of command. It is strictly prohibited to take or allow any repressive action against a person who, in good faith, reports certain problems.

- carrying out checks in case managers hear or have suspicions about the occurrence of disciplinary violations. Managers should never ignore issues of professional conduct.

1.6

THE Q AGENCY commitment

The Agency actively promotes integrity and the highest ethical standards in all aspects of its business activities and among all its employees, collaborators and partners.

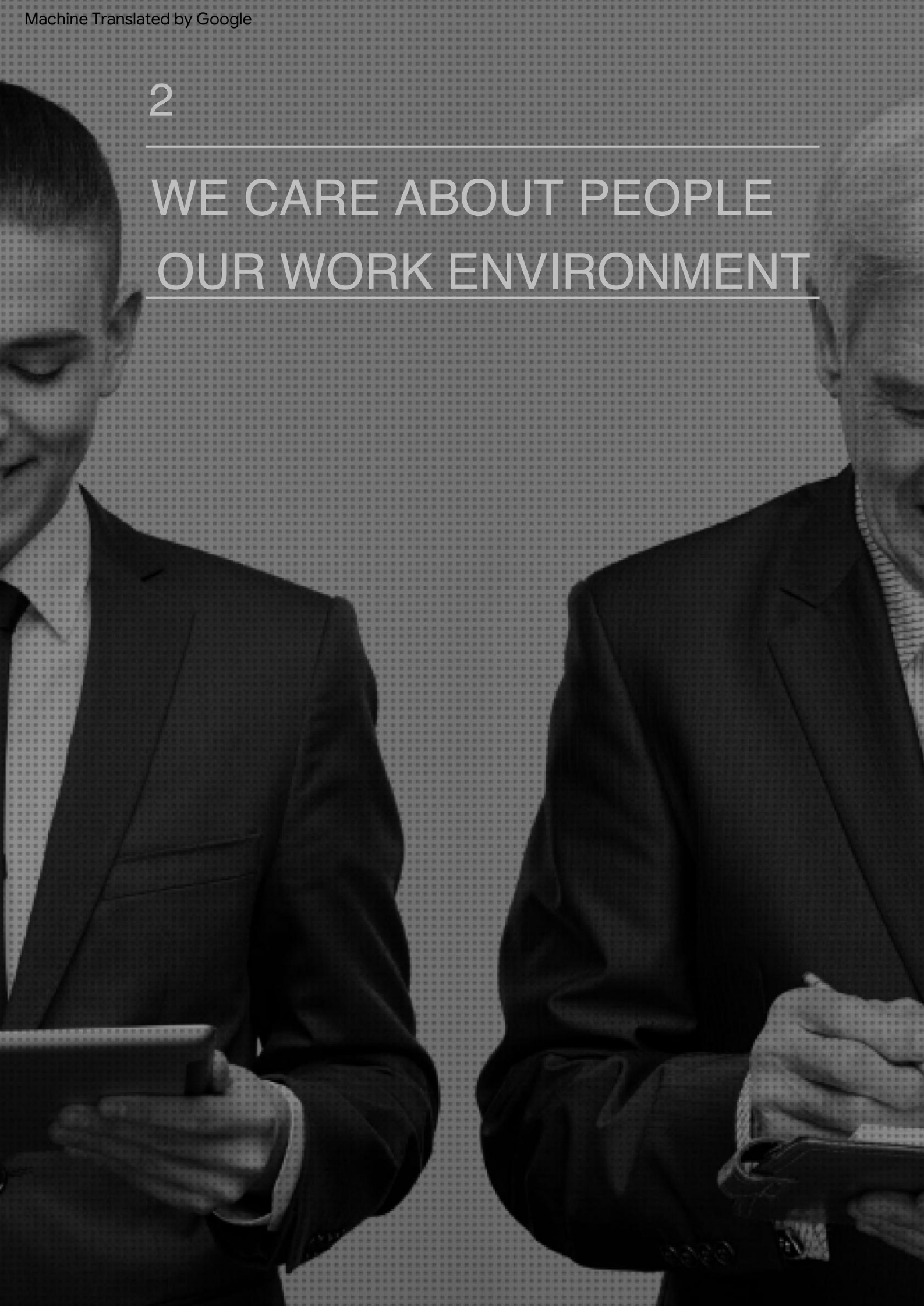
To ensure that we live up to our values and comply with the obligations set out in

The Q Code of Business Ethics and Compliance
The Agency undertakes:

- to build and promote a corporate culture of integrity
- to create an adequate knowledge of the Code Agency at all hierarchical levels
- to create a framework of measures to prevent, detect and respond to any inappropriate behavior or that does not comply with the provisions of this Code.
- to offer all its members a service effective assistance, information and guidance that can help enforce the provisions Agency Code
- to periodically ensure special sessions of training related to the application of the provisions of this Code and the annual certifications.
- to improve continuously corporate governance standards

2

WE CARE ABOUT PEOPLE OUR WORK ENVIRONMENT



2.1

Mutual respect in THE Q AGENCY

All of us must permanently demonstrate the respect we have for others in the Agency as well as for all interested parties in our activity.

In the course of our activities, we interact with people of different ethnicities, cultures, political beliefs, ages, genders and/or sexual orientations or with people who have disabilities. We must treat all these people with respect.

We all have the right to respect for human dignity, confidentiality, privacy and other personal rights.

As a business organization with values to which we are loyal, we respect others and absolutely prohibit any behavior and/or action that may lead to discriminatory behavior, aggression of any kind or violence.

DISCRIMINATION

Discrimination exists where a person or group of persons is treated differently or negatively because of personal characteristics, beliefs, convictions or on any other grounds prohibited by law, which include nationality or ethnic origin, culture, religion, political beliefs, age, mental or physical disabilities, gender or sexual orientation.

Discrimination **is not tolerated** and is sanctioned by termination of employment with the Agency.

HARASSMENT AND BULLYING

Harassment, regardless of whether it is sexual, psychological or of any other kind, exists when the behavior towards another person is shocking or offensive, affects the dignity of the person or their psychological or physical comfort or causes the creation of a hostile work environment.

Harassment determines the creation of an intimidating, hostile, degrading, disturbing or offensive work environment for the person in question and can be presented in the form of hostile or unwanted behavior, verbal comments, actions or gestures of a repeated or singularly serious nature. This includes intimidation.

Harassment **is not tolerated** and is sanctioned by termination of employment with the Agency.

VIOLENCE

Violence is the use of physical force that causes or may cause physical harm, or actions, behaviors or statements that can reasonably be perceived as a threat to a person's safety or security.

Violence **is not tolerated** and is sanctioned by termination of employment with the Agency.

2.2

Health and Safety in the Agency

The safety of our staff is the most important element in everything we do. We are committed to ensuring a safe and healthy working environment in all offices and workplaces.

THE Q AGENCY will ensure that the laws in force relating to health and safety at work constitute the minimum standard observed in all areas where we operate.



Our aim is to ensure that the health, safety and physical condition of our staff and those who come into contact with the Agency are protected through hazard recognition, risk assessment and the elimination of workplace hazards. Thus, we will be able to work in an accident-free environment. We must act together to reduce the frequency and severity of incidents

and accidents by identifying, reporting and eliminating unsafe and dangerous conditions in the workplace. We are all responsible for health and safety at work.

For further information, please see our health and safety policies and procedures.

2.3

Drugs and alcohol

People whose work capacity is diminished by the effect of drug or alcohol consumption negatively influence performance, the work environment and the safety of staff, third parties and the public.

We must not be under the influence of alcoholic beverages or drugs at work. In addition, the consumption, sale, purchase and possession of illegal drugs in the workplace are strictly prohibited.

Moreover, except in cases authorized by a member of the Strategic Management Council and always respecting the local laws in force, consumption, sale, purchase or

the serving of alcoholic beverages in all premises where the Agency's staff work.

Clear instructions on this subject are included in our health and safety policies and procedures.



2.4

security

We are committed to protecting personnel, assets and information regardless of where they carry out the respective activity.

Our aim is to ensure that security risks are identified and mitigated to ensure the safety and security of staff at work.

We must be alert to potential security threats and respond in accordance with applicable security plans, protocols or procedures. We will not willingly engage in

potential business activities that involve the assumption of security risks that cannot be properly and reasonably mitigated.

Nor will we do business with security service providers who do not adhere to our security and human rights principles.

We are responsible for complying with the security provisions of THE Q AGENCY.

2.5

Personal information

THE Q AGENCY is committed to respecting individual rights to privacy and has taken the necessary protective measures to ensure correct registration and data security.

We must take special care and use personal information with discretion. In general, THE Q AGENCY will ensure that consent is obtained before making such disclosures of personal information.

Any personal information disclosed or collected by the Agency in the course of business activities may only be used in the manner and for the purpose for which it was disclosed or collected (for example, The Q Agency may disclose to its clients personal information from an employee's Curriculum Vitae for the purpose of participating in an auction or in the case of drawing up a proposal).

There may also be other situations where disclosure of information to third parties is required or otherwise permitted by law.

Disclosure may also be necessary for the purpose of administering a program by a third-party provider (for example, in the case of an insurance program administered by a third-party provider).

In these cases, THE Q AGENCY will request the third party to comply with the same rules.

Personal information may also be shared with third parties for audit purposes or with local authorities, if permitted by law.



3

AVOIDING CONFLICTS BY INTERESTS IN OUR BUSINESS





During the whole period of carrying out activities in THE Q AGENCY, we must ensure that we act in its interest.

In the performance of our professional duties, we must avoid real or potential conflicts of interest, even suspected ones.

A **conflict of interest** exists, in fact, if a situation arises that affects the evaluation, objectivity or independence of a person due to a possible conflict between the personal interests of that person and the professional or public interest.

A **potential** conflict of interest exists if there is a possibility of a conflict of interest occurring in the future.

A **suspected** conflict of interest exists where an observer can reasonably conclude that a conflict of interest exists, even though it does not exist.

We must immediately report any activities that represent actual, potential or suspected conflicts of interest by completing **the form** [Disclosure of conflict of interest](#).

This form can be obtained from the compliance officer responsible for the structure in which you operate.

The assessment to determine whether the disclosed situation represents a real, potential or suspected conflict of interest is done by the manager and the compliance officer and if necessary, specialists from the Ethics and Compliance Department will be called upon.

If such a real, potential or suspected conflict of interest is deemed to exist, management will describe the steps to be taken to remedy this situation.

The information disclosed will be treated as confidential and will be disclosed only to those persons who are directly involved in the conflict of interest assessment.

Some examples of conflicts of interest are presented in the subsections below. However, we must always be prepared and have the ability to identify situations where we could be in a position of potential, real or suspected conflict of interest.

If you are unsure whether an actual, potential or suspected conflict of interest may exist, please consult with your compliance officer.

3.1

A second job and incompatibilities

We must report any current or potential secondary employment relationship with another company or holding any administrative position in another organization regardless of its type.

The members of the Boards of Directors and those of the Strategic Management Council must inform the Vice President of the Agency regarding administrative functions or other important activities that are not related to THE Q AGENCY. In conclusion, we must not involve ourselves or be involved in activities incompatible with the activity we carry out within THE Q AGENCY.

Below are some examples of actual, potential or suspected conflicts of interest associated with a second job and the activities that create conflicting or incompatible situations:

- performing activities or tasks that conflict and are incompatible with another activity carried out within THE Q AGENCY (for example, the person who purchases goods and services is also the person who approves the respective transaction);
- employment at a second job limits our ability to fulfill our duties in the Agency;
- accepting a position as an administrator of a third-party organization without disclosing and obtaining the consent of the direct manager and the Human Resources department or, as the case may be, the Vice-President;
- holding (directly or indirectly or through intermediaries) a significant financial interest in an external company, which has or tries to do business with or is a competitor of the Agency;
- participation (directly or indirectly or through intermediaries) in foreign business or in financial activities that compete or may compete with THE Q AGENCY;
- participation (directly or indirectly or through intermediaries) in an external business that provides services or does business with THE Q AGENCY. This is particularly important where there is the possibility of preferential treatment by virtue of your position in the Agency;
- conducting business activities in THE Q AGENCY name with a family member or a business organization in which a person or a member of his family is associated, if such business interests have not been disclosed to the line manager or compliance officer or, if applicable, the Vice President before of the conclusion of any commitment. In such cases, a clear decision will be issued specifying the fact that there are no objections.

3.2

Personal relationships at work

THE Q AGENCY allows hiring people who are part of the same family or employees who have personal relationships with another person working in the Agency, provided there are no conflicts of interest.

In this context, we present some examples of situations that represent real, potential or suspected conflicts of interest:

- direct or indirect reporting to a family member or to a person with whom you have a personal relationship;
- the role of direct or indirect supervisor of a family member or a person with whom you have a personal relationship;
- exercising some influences on another people who work at THE Q AGENCY for the benefit or detriment of a family member or a person with whom you have a personal relationship;
- using your position to influence the situation of a family member or a person with whom you have a personal relationship.

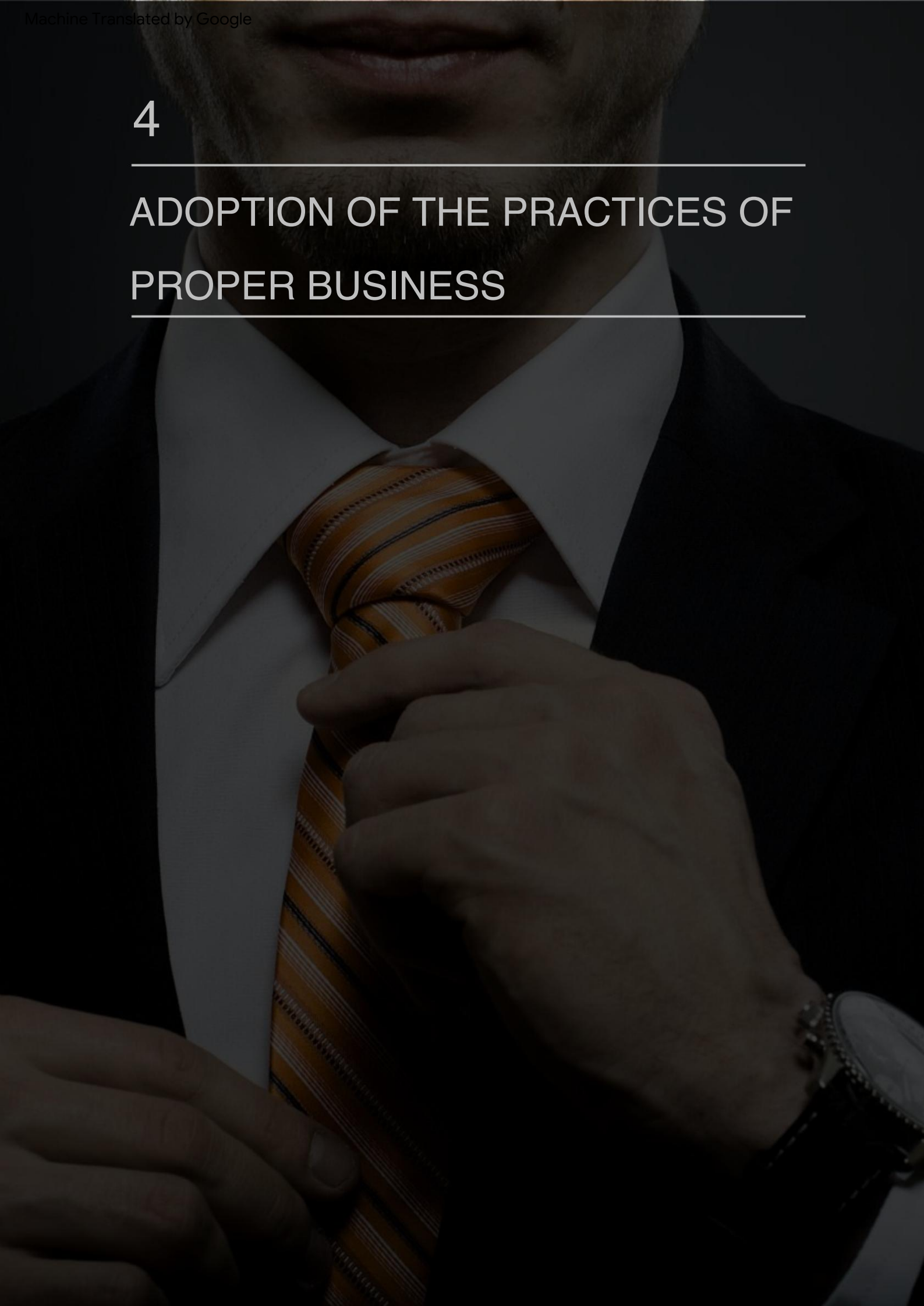
We recognize that the development of THE Q AGENCY also resulted from family and personal relationships. We are aware that family or personal relationships in such an innovative and disruptive business can cause real, potential or suspected conflicts of interest that we, the management of THE Q AGENCY, are committed to diligently reducing. New situations of conflicts of interest that may arise from family or personal relationships will not be tolerated.

If you are in doubt as to whether your relationship with another person working in the Agency may represent an actual, potential or suspected conflict of interest, you should contact the Ethics and Compliance Officer for further information.

If your family or personal relationships may cause real, potential or suspected conflicts of interest, we have a responsibility to declare these conflicts. Self-disclosure of personal relationships to the Ethics and Compliance Department will be treated with the utmost discretion and confidentiality.

4

ADOPTION OF THE PRACTICES OF PROPER BUSINESS



Because we are highly competitive in all of our markets, all of our business activities must be conducted fairly and in compliance with all applicable laws and regulations.

Any criminal behavior is strictly prohibited. If you are in doubt as to the interpretation of any law or regulation, or are in a situation that may constitute a violation of such law or raise doubts about the appropriate legal or ethical action, consult the Ethics and Compliance Department or the Legal Office for additional information.

4.1

Anti-trust laws and competitive practices

In THE Q AGENCY we must commit to complying with good business practices by complying with all anti-trust and anti-competition legislation in force in the jurisdictions in which we operate.

Although these laws and regulations may differ by jurisdiction, they are generally designed to maintain free and open competition in the marketplace.

In accordance with these legal provisions, discussions, understandings or agreements concluded with competitors are prohibited, among others, to:

- fix or control prices, terms or conditions;

- limit competition or relationships with suppliers and customers;

- divide or allocate customers, markets or territories between THE Q AGENCY and our competitors;

- influence the resale prices collected by our purchasers of products or services; or

- do not participate in an auction, withdraw an auction or send a false bid in order to make the bidder with whom we have an agreement win the bid. However, teaming up or joint venture with potential competitors to bid on a project is usually not an understanding or prohibited conduct unless it is intended to lessen competition.

We must not engage in activities that may be considered anti-competitive, abusive or unfair.

We must not attempt to obtain information about competitors using illegal practices (industrial espionage, corruption, theft, electronic interception systems, etc.) and we must refrain from making false or misleading statements about competitors or their services.

4.2

The fight against bribery and corruption

THE Q AGENCY is committed to carrying out its activity with transparency and integrity, prohibiting corruption and bribery in any form.

We must not ask, offer, promise, grant or authorize, directly or indirectly or through intermediaries, the receipt of any kind of bribe, reward, payment or any other attempts to offer attention (gifts, banquets, employment, contracts or advantages of any kind) to third parties to influence or give the impression of influencing certain actions, non-actions or decisions with the aim of unfairly obtaining an advantage, retaining a business interest or gaining influence improperly on the actions of those third parties.

We are all responsible and must educate ourselves to be able to recognize corrupt activities and to ensure that we are not involved in such activities, directly or indirectly.

For additional information or clarifications regarding the avoidance of bribery and corruption, please contact the compliance officer or specialists in the Agency's Ethics and Compliance Department.

4.2.1

Facilitation payments

Facilitation payments are unofficial payments (compared to legal and official taxes and fees) made to a person for the purpose of obtaining or expediting the performance of routine government services or activities that the paying person or company is already entitled to receive .

The use of any facilitation payments is **strictly prohibited**.

If, however, we have no other option and we must provide a payment to protect ourselves against an imminent and serious threat to our health, safety or well-being, that payment will not be considered a facilitation payment.

This will be considered blackmail and thus will be allowed under this type of duress.

All payments of this type, made under exceptional conditions, must be correctly reported

the manager, the compliance officer to whom you belong or the specialists in the Ethics and Compliance Department to ensure that correct records are made and the competent authorities are informed.

For additional information, contact the Ethics and Compliance Department and/or the Legal Office.

4.2.2

Gifts and hospitality

It is not prohibited to offer or accept occasional gifts, meals or invitations to unsolicited events, of a reasonable value and in accordance with applicable law, the provisions of this Code of Ethics, and fundamental policies and procedures.

However, we are not allowed to offer, accept or exchange gifts, meals or invitations to events if:

- these are made in the form of payments in cash or cash equivalents, such as gift certificates, coupons, vouchers, loans, shares or stock options, etc.;
- are exaggerated or extravagant;
- are offensive, in bad taste or otherwise violate our commitment to mutual respect;
- violates a law, a regulation or a rule or the standards of the organization or the policy of the organization of which the person who receives the respective attention is a member;
- otherwise, they can be interpreted as a way to influence an ongoing acquisition process or affect the business decision being negotiated;
- can be considered as a bribe or reward;
- they are part of an agreement (formal or assumed) to do or receive something in exchange;

• can be interpreted, reasonably, as a reward for preferential treatment, real or suspected, or create obligations for the other party;

• can influence the recipient or the organization of which the recipient belongs in any business activities;

• are frequent.

We must pay attention to business etiquette, especially when giving a gift to a government official, as they must follow much stricter rules, regulations and laws.

For details, see section 4.3.2 – Government officials.

We must not use our own assets, including funds or per diems, to provide gifts, meals or event invitations to third parties if the use of Agency resources is prohibited.

All gifts and hospitality provided to third parties by our staff must be fully and accurately recorded in THE Q AGENCY books and records.

In any case, we must consult our gifts and hospitality policies and procedures before giving or receiving gifts, meals or invitations to events.

For additional information, contact the Ethics and Compliance Department or your compliance officer.



4.3

Third parties

A "third party" is a person or organization with whom we may come into contact in the conduct of our work or business.

The third parties with whom we interact in the activity we carry out within THE Q AGENCY are generally:

• customers;

• competitors;

• suppliers;

• government officials;

• business partners (for information see section 4.3.1 – Business partners).

Within THE Q AGENCY, we strive to have transparent and fair partnerships with third parties. We want to collaborate with third parties who share the same values and who have a higher level of cultivating integrity.



Therefore, we expect third parties to adopt and implement practices similar to those of Our code and to:

• respects all laws and regulations in force;

• avoid offering bribes, rewards or other forms of corruption;

• does not engage in money laundering or financial terrorism activities;

• assumes responsibility for the health and safety of employees;

• respects the human rights of its own employees;

• promotes sustainable local development;

• tries to ensure that their activities of business is conducted in an environmentally responsible manner;

• promote and copy our commitment to the quality of work provided.

We may terminate any business relationship with a third party that we believe is acting inconsistently with our values and practices.

For additional information and instructions, contact the Compliance Officer and/or the Agency's Ethics and Compliance Department.

Business partners

4.3.1

THE Q AGENCY defines "business partner" as a third party who, depending on the context, acts on behalf of or in partnership with THE Q AGENCY for the purpose of fulfilling a specific task or business objective.

Actions taken by others to assist us in our business activities directly affect us.

We are responsible under the law for the actions that our business partners take on our behalf, as if they were done by us.

Accordingly, we must ensure that the persons or organizations acting on our behalf behave as we should behave.

It is our obligation to ensure, for each partner with whom we have business relations, a **compatibility assessment** is carried out and to ensure that the respective assessment has been approved.

One of our **first** obligations is to carefully select business partners to ensure that their businesses are based on the same values and principles.

During the business relationship, we must continuously and correctly monitor our business partners to avoid any problems.

For additional information, please review our policies and procedures regarding business partners and consult the Agency's Ethics and Compliance Department.

4.3.2

Government officials and the relationship with the state

Due to the cross-disciplinary nature of our business, there is an opportunity to regularly interact with government officials in the country or the whole world, directly or indirectly.

A "government official" is the senior official or their employees or any person who represents or acts:

- at any governmental level (international, national, provincial, municipal or other level);
- in political parties, party officials and candidates for political positions; • in entities owned or controlled in whole or in part by any governmental level; • in public or inter-governmental organizations; • or a person holding a legislative, administrative, legal or military position.

"Government-Owned and Controlled Entity" means a legal entity that is created by a government (federal, provincial, municipal or otherwise) and in which that government exercises control, generally by appointing its own Directors and Administrators.

A state-owned and controlled entity may be wholly or partly owned by a government and should not be confused with companies in which shares are held in an amount that does not confer any right of control by a government body.

Examples of state owned and controlled entities: public transport companies, public utility companies, national airlines, broadcasting companies, universities, hospitals, national agencies, national oil companies, state corporations, etc.

When we come into contact with government officials, we have a responsibility to know and strictly comply with the laws, rules and regulations that apply to government officials or government contracting entities.

In any case, you must:

- we interact honestly, correctly and transparent with government officials;
- we never offer anything for the benefit personally to a government official if this is not permitted under applicable laws and regulations and to fully comply with the provisions of our Code and fundamental policies and procedures; • we refrain from offering

valuable goods to individuals, if we have reason to believe that it will be offered to a government official; • **never make offers of employment** to former or current government officials or an immediate family member of him/her without consulting the Ethics and Compliance Department.

Activities that may be acceptable in the case of employees of a private sector company may be inappropriate or illegal in the case of government officials.

Therefore, **we must act with great caution when we come** into contact with government officials.

4.4

Political contributions

It is prohibited to offer political contributions on behalf of THE Q AGENCY in favor of political candidates, parties, organizations or other political entities, or any government department.

We may engage in personal political activities, using our own capabilities, without using the name, time, funds, properties, resources or list of employees, partners and collaborators of THE Q AGENCY and without soliciting political contributions from any person working in Agency.

For additional information, please consult the compliance officer or specialists in the Ethics and Compliance Department.

4.5

lobby

Although it is a legal method of access to legislative, governmental and municipal institutions, in many jurisdictions laws have been passed which require certain levels of disclosure of lobbying activities.

Due to the nature of its activity, there is a possibility that THE Q AGENCY may engage in lobbying activities, by telephone, written communications or by organizing meetings with persons holding public positions.

Because lobbying rules may differ from one jurisdiction to another, we need to know the applicable rules and ensure compliance with them.

Being involved in communications with a government or legislative official,

this may in some cases be considered **"engagement in a lobbying activity"**.

Accordingly, we must ensure that we fully comply with all registration or notification requirements and promptly inform the Vice President of the Agency that we have met all such obligations.

For additional information, contact the Ethics and Compliance Department and/or the Legal Office.



4.6

Money laundering

Method by which money obtained or generated from illegal activities (eg drug trafficking, smuggling, copyright infringement, piracy and corruption) is laundered by being introduced into the legal financial and business circuit to hide the origin of the money.

Money laundering is a global problem with devastating economic and social consequences.

We must comply with anti-money laundering laws and regulations.

We must act carefully to prevent the Agency from being involved or used in money laundering or other criminal activities.

Therefore, we must use a **certain level of due diligence** before entering into a relationship with a customer or other third party.

We must also recognize and monitor potential warning signals that may help detect unusual and suspicious activity.

We must **promptly report to the compliance officer** any suspicious activity that may involve money laundering or other criminal activities.

For additional information, contact the Ethics and Compliance Department and/or the Legal Office.

4.7

Trade compliance and anti-boycott

It is extremely important that all activities conducted by THE Q AGENCY fully comply with the trade sanctions, export control, customs and anti-boycott laws and regulations of all jurisdictions in which we operate.

Export control legislation restricts the transfer of goods, services, hardware, software or technology across certain national borders without the possession of permits in accordance with applicable export control regulations.

In addition, we must ensure that we comply with applicable restrictions on persons or countries where economic sanctions have been imposed.

The legislation governing business activities is complex and if not complied with, we risk being fined by the relevant authorities and/or banned from doing business in certain countries.

An example of an item controlled by host country law that may require an export license or re-export license is **software** that contains certain encryption or performance standards or training programs for products restricted in certain states.

We must also **avoid including in contracts** any clause that could affect the illegal boycott of trade with a country.

Any request to include such a clause must be reported to the Legal Office department even if THE Q AGENCY does not bid on the project or conclude the contract.

THE Q AGENCY and the third parties it collaborates with may be subject to serious penalties if they violate these laws and regulations.

The consequences include significant fines and the withdrawal of the right to use simplified import and export procedures in certain countries where we will operate.

For additional information, contact the Ethics and Compliance Department and/or the Legal Office.

4.8

Use of inside information

During the relationship with the Agency, we may have access to "inside information" related to a fact or physical change, which is not public and which, if made public, could have an impact on the price of THE's securities Q AGENCY, of clients, suppliers or partners in joint ventures, listed on the securities markets.

Privileged information may include confidential financial information, sales and performance figures, plans for changing dividends or new financing, acquisitions or entering into important new contracts or other financial matters, claims and legal assistance, etc.

In the near future THE Q AGENCY plans to transform into a joint-stock company and issue securities.

Dealing in shares or other securities belonging to THE Q AGENCY or any clients, suppliers or joint venture partners, or recommending such deals to others, while possessing privileged information regarding these companies is not only prohibited by the Agency Code, but is also illegal and may constitute a serious crime.

Executive Directors within THE Q AGENCY have additional responsibilities under the law regarding collateral transactions.

We also cannot buy assets or securities belonging to a company that

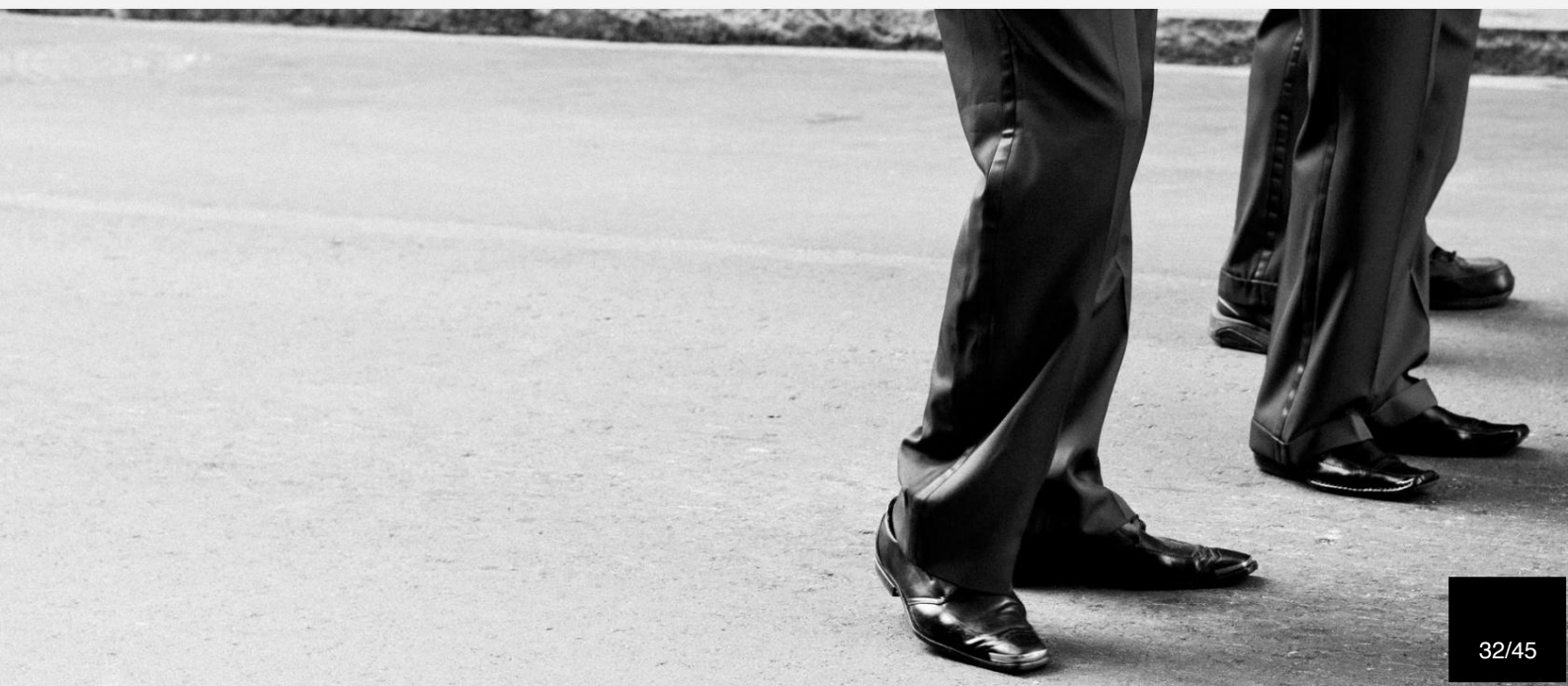
we know that it is the subject of a possible acquisition by THE Q AGENCY.

Moreover, if we are in possession of such privileged information, we cannot use this information to purchase any nearby property for the purpose of speculating or investing, without the prior approval of the Vice President and the Head of the Bureau Legal.

We all have a role in protecting privileged information from being disclosed to any third party, including clients, consultants, family, friends, financial analysts and journalists.

This type of information must be kept within THE Q AGENCY and may only be disclosed to persons specifically authorized in this sense.

For instructions on the appropriate procedures to be used in the case of privileged information, please contact the Vice President or Head of the Legal Office or the Head of the Ethics and Compliance Department.



4.9

Accounting methods and record keeping

Keeping correct, complete and secure records is essential for running the business because they form the basis of decisions and strategic planning.

This information forms the basis of the financial reports and is necessary to fulfill the obligations that THE Q AGENCY has towards investors, interested parties and regulatory authorities to provide them with complete and correct information.

Each of us must make the following commitments in relation to our books and records, regardless of the purpose for which the information is used:

- commercial documents, expense reports, invoices, receipts, payrolls, employee records and other reports are prepared with care and honesty and on time;
- all transactions are carried out at the level of authority established by our policies and procedures and in accordance with applicable laws, rules, standards and regulations;
- all transactions are based on appropriate documentation;
- transactions are recorded based on a logical reasoning and a correct record;
- no transaction, property, liability, alleged liability claim, potential claim, legal assistance or other financial information must be hidden from the management, the Legal or Financial Office of the company, or from the internal and external auditors of the Agency;
- every effort is made to resolve problems and misunderstandings arising in internal and external audit reports;
- any unregistered amounts or assets, suspicious, false or artificial accounting entries made in our books or records will be reported **immediately** _____ Ethics and Compliance Department;

Accordingly, all of our records must be complete, accurate and secure, and must be prepared in accordance with applicable laws and regulations, as well as with The Q Agency's accounting and internal reporting policies and procedures.

- all inconsistencies, mistakes or known omissions will be disclosed to the respective interested parties and will be promptly corrected through credits, refinancing or other mutually accepted methods;
- all issued and signed documents are, to the best of our knowledge, correct and true;
- no funds are established or kept secret or unrecorded cash or other assets for other purposes;
- access to **sensitive information** or confidential information is limited to ensure that it is not accidentally or intentionally disclosed, altered, misused, or destroyed.

The use of THE Q AGENCY funds or other assets for illegal or inappropriate purposes is strictly prohibited, as is the making of false or erroneous registrations or the failure to register any bank accounts, created for any purpose, regardless of whether they concern sales, purchases or other activities, as well as incorrect or atypical financial arrangements made with third parties (eg over-invoicing or under-invoicing).

Managers and members of management, as well as persons responsible for accounting and record keeping, must be careful not only to ensure the application of this prohibition, but also to supervise the correct use of The Q Agency's assets.

For more information, see the Office Financial.

4.10

Corporate social responsibility

Human rights

4.10.1

We believe that all human beings must be treated with dignity, objectivity and respect. THE Q AGENCY is committed to supporting the protection and respect of human rights in all domestic and international operations and to ensure that it is not complicit in activities that violate human rights.

We will not engage in activities that encourage human rights violations or human trafficking or the use of child labor and forced labor.

In addition, we will **never do business** with subcontractors, business partners, suppliers or third parties who do not adhere to our human rights principles

Community involvement

4.10.2

THE Q AGENCY is committed to maximizing the sustainable benefits of all the local communities in which we work and live.

By listening to the needs and expectations of the community and by respecting the unique character of each community, we build a strong and sustainable relationship.

We collaborate with local non-governmental organizations and private sector partners to develop and implement sustainable programs around our projects.

Through professional training, mentoring and knowledge-building programs, we offer workers, companies and local communities the opportunity to take on valuable experience and implement initiatives to increase employment and procurement opportunities within the project.

Donations and sponsorships

4.10.3

THE Q AGENCY prioritizes requests for donations or sponsorships that respect its corporate values and its role as a good corporate citizen and that reflect THE Q AGENCY's commitment to creating an ethical business environment.

A **donation** represents a financial or in-kind aid offered by THE Q AGENCY to a charity or non-profit organization for the benefit of a society or a community.

A **sponsorship** is a business contract whereby THE Q AGENCY provides a contribution to an organization in exchange for receiving negotiated rights to promote the Agency and its business (eg advertising, brand visibility, etc.).

THE Q AGENCY is engaged in corporate social responsibility activities using different sponsorship methods as well as through donations offered to various organizations, carefully selected from areas where we can really make a difference.

We need to make donations or sponsorships only if they respect the priorities and strategy adopted by THE Q AGENCY and are in full accordance with the provisions of our Code and fundamental policies and procedures.

We must always be aware that donations and sponsorships may present risks of corruption and may be interpreted as related to the obtaining of abusive advantages.

If you have any doubts about the appropriateness of the donation or sponsorship in question, you should contact the Ethics Department and Agency compliance

Environment protection

4.10.4

THE Q AGENCY is committed to protecting the environment and conducting business in an environmentally responsible manner.

Such goals can only be achieved with the support and participation of our entire staff and require effective leadership from our managers.

We must comply with and respect both the laws in force and the environmental protection standards and practices adopted by THE Q AGENCY.



5

PROTECTION OF ASSETS

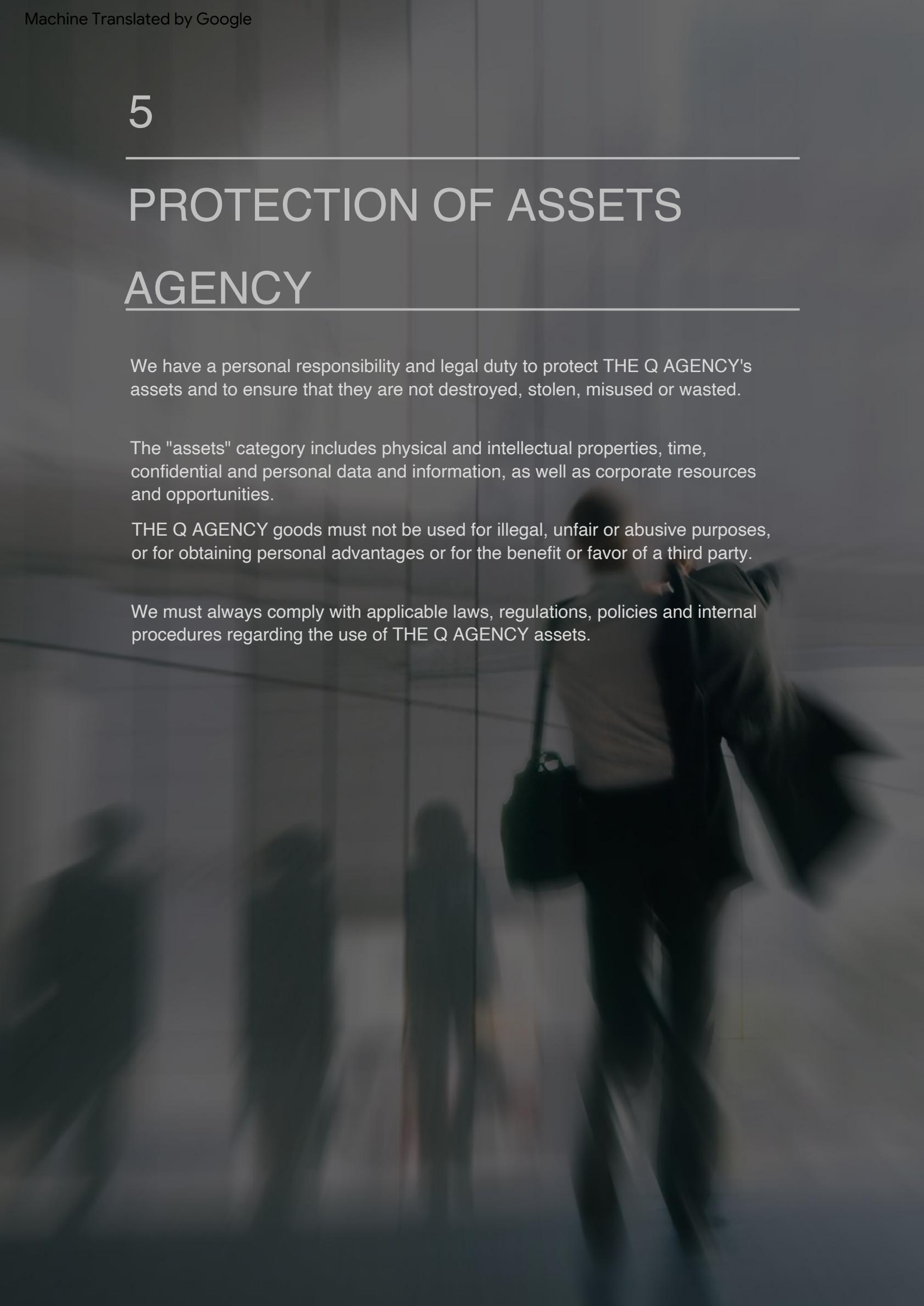
AGENCY

We have a personal responsibility and legal duty to protect THE Q AGENCY's assets and to ensure that they are not destroyed, stolen, misused or wasted.

The "assets" category includes physical and intellectual properties, time, confidential and personal data and information, as well as corporate resources and opportunities.

THE Q AGENCY goods must not be used for illegal, unfair or abusive purposes, or for obtaining personal advantages or for the benefit or favor of a third party.

We must always comply with applicable laws, regulations, policies and internal procedures regarding the use of THE Q AGENCY assets.



5.1

Electronic resources

The agency provides the electronic resources necessary to carry out the activity. "Electronic resources" include, for example, e-mail addresses, information systems and electronic equipment, software programs, Internet and network access.

All electronic communications related to the work activity must be carried out through the e-mail address provided by the Agency.

The use of private or personal e-mail addresses for work is strictly prohibited.

While personal use of THE Q AGENCY's electronic resources is permitted if it does not interfere with job duties, abuse of this privilege falls within the category of disciplinary misconduct.

The electronic resources made available by THE Q AGENCY are the exclusive property of the Agency and must be used responsibly, appropriately and fairly.

The electronic resources of THE Q AGENCY must not be used to change, store or process content that:

- are illegal (for example downloading illegal materials protected by copyright laws);
- promotes and encourages harassment;
- may be perceived as racist, defamatory, discriminatory, violent, atrocious, sexist or pornographic;
- or may negatively affect the reputation of THE Q AGENCY.

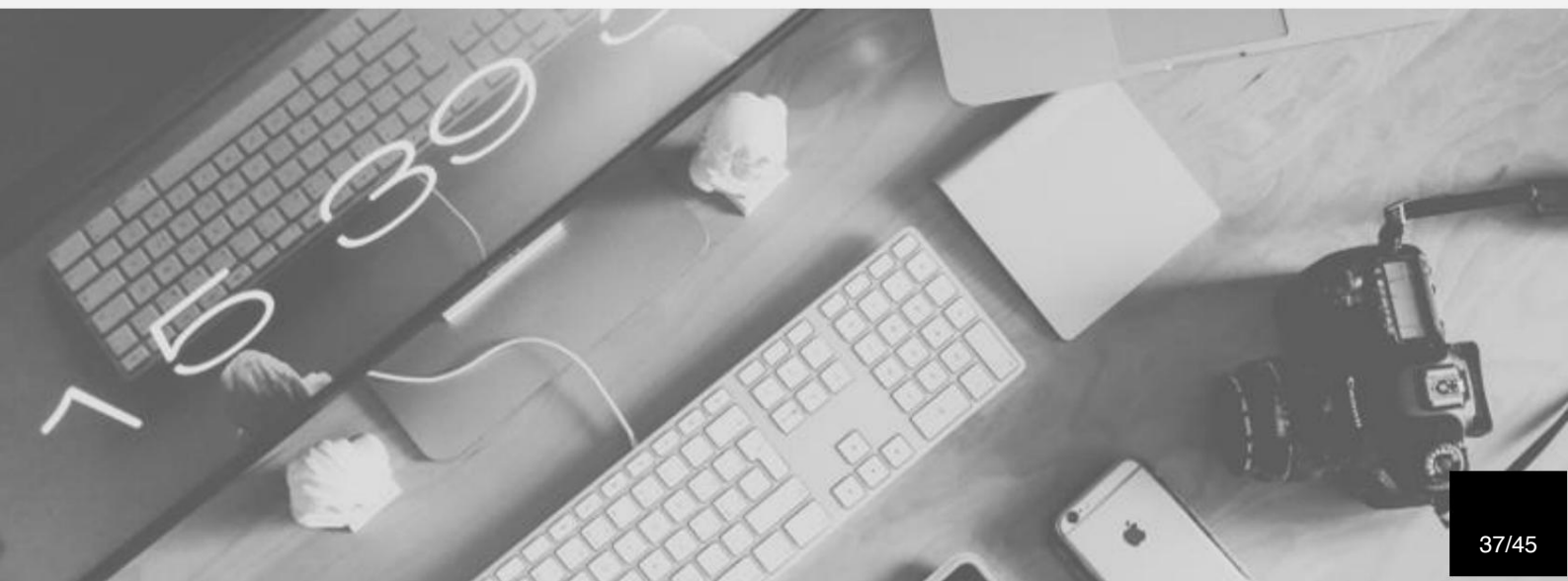
However, when using electronic resources, we must take appropriate precautions to avoid compromising the integrity of THE Q AGENCY equipment or systems or disclosing private or confidential information.

THE Q AGENCY may exercise its right of surveillance associated with the use of its electronic resources and reserves the right to monitor and analyze any content changed, stored or processed using THE Q AGENCY's electronic resources, within the limits permitted by law.

Therefore, it is understood that, throughout the period in which we work or carry out our business activities with THE Q AGENCY and to the extent permitted by law, we waive any right of confidentiality to the information exchanged, stored or processed using the electronic resources of THE Q AGENCY.

We understand that this information may be disclosed to competent law enforcement authorities.

For additional information about the permitted use of THE Q AGENCY's electronic resources, please consult your compliance officer.



5.2

Confidentiality of information

During the period in which we work or carry out our business activities with THE Q AGENCY, we may have access to information that may be considered confidential.

Confidential non-disclosure information belonging to THE Q AGENCY includes, but is not limited to:

- details about the organization, customers, suppliers, prices, markets, equipment, sales, profits, figures from internal reports and other topics related to the Agency's business;
- any kind of information regarding research and development activities carried out by **Research structures, Technical Development and Business Development** of THE Q AGENCY;
- technical information about our products, services and processes;
- information about the strategies of marketing and services; details of mergers, acquisitions, or sales or acquisitions of current and potential assets;
- and information regarding employees and human resources.

We must prevent improper or unauthorized access or disclosure of any such secret or confidential information belonging to THE Q AGENCY or entrusted to us by third parties.

Our obligation to protect the confidentiality of information applies both during the period in which we work or carry out our business activities with THE Q AGENCY, and after it ends.

These obligations remain in force even after the termination of the employment or collaboration contract concluded with the Agency.

Similarly, we must not access or use confidential information belonging to customers, competitors, business partners, etc., in order to gain an unfair advantage.



5.3

Intellectual property

Copyrights, trademarks, designs, names, logos, inventions, improvements, photographs, video recordings, discoveries and any other forms of intellectual property (such as protocols, procedures, technical processes, research methods, offers, etc.) created or modified during the period of our work or business relationship with THE Q AGENCY remain the exclusive property of THE Q AGENCY.

In addition, intellectual property developed outside of the relationship with THE Q AGENCY belongs to THE Q AGENCY if such development occurred as a result of the use of confidential information obtained in the course of our employment or business with THE Q AGENCY.

Our people have a duty to protect THE Q AGENCY's intellectual property, just as THE Q AGENCY must respect that of others.

It is not allowed to copy, appropriate or destroy any intellectual property belonging to THE Q AGENCY upon termination of the relationship with THE Q AGENCY.

Although we may have the impression that we contributed to the realization of some works during the period in which we were employed and we want to benefit from them, the works are the exclusive property of THE Q AGENCY and we must not use them for other purposes or for the benefit of another employer.

In addition, THE Q AGENCY strictly prohibits the unauthorized use, theft or appropriation of intellectual property belonging to third parties, including information collected from the Internet if it is protected.



5.4

External communications

Opinions or information requested from persons working in THE Q AGENCY or referring to business activities requested by external groups or organizations must be directed to the head of Corporate Communications for resolution.

The Office of Corporate Communications is the official contact for any member of the media who wants an interview, an opinion, or any comment about the company or any topic that may affect our business.

If we receive a request from a media representative, even if it was framed as a request for comment or personal opinion, we must forward it to the Corporate Communications office.

Unless requested or coordinated directly by the Corporate Communications office, any contact with media representatives must be made as a private person.

Any participation, through which THE Q AGENCY is represented, as a speaker at a conference, round table or any form of media –

television, radio, online, social media, print media, etc., must be authorized by the direct supervisor and notification must be sent in advance, if possible, to the Corporate Communications office.

If such participation occurs without any planning, the Corporate Communications office must be informed immediately.

Even if we express our opinions about external interests, unrelated to THE Q AGENCY business, we must exercise caution and ensure that all our comments are strictly personal in nature and do not engage, compromise or implicate in no way THE Q AGENCY.

THE Q AGENCY encourages us to be the company's ambassadors on social media, although when using social media or other means of communication we must not disclose confidential information we are involved in and must always remember to comply with the Code of Ethics.

For additional information about external communications, contact the Communications office corporation



6

REPORTING OF VIOLATIONS AND COMPLAINTS



6.1

Duty to report

It is the responsibility of each of us and we must all ensure that we respect the values of THE Q AGENCY and this Code

We have a duty and responsibility to report in good faith any known or potential violations of our Code and fundamental policies and procedures, as well as any violations of applicable laws, rules and regulations, or any instances of misconduct or use of pressure to compromise the company's ethical standards.

Depending on how the local legislation is applied, the violation of the reporting obligation may result in the application of disciplinary measures, including termination of the contract.

If we are involved in a situation or have information about a problem that is or may be a violation of our Code and its fundamental policies, we must report the problem using one of the resources below:

• hotline for compliance and ethics issues (see the Contacts section);

• the direct manager; the person in charge of compliance; Human resources department;

• Financial and Internal Audit Department;

• Legal Department; or the Center of consulting on compliance issues.

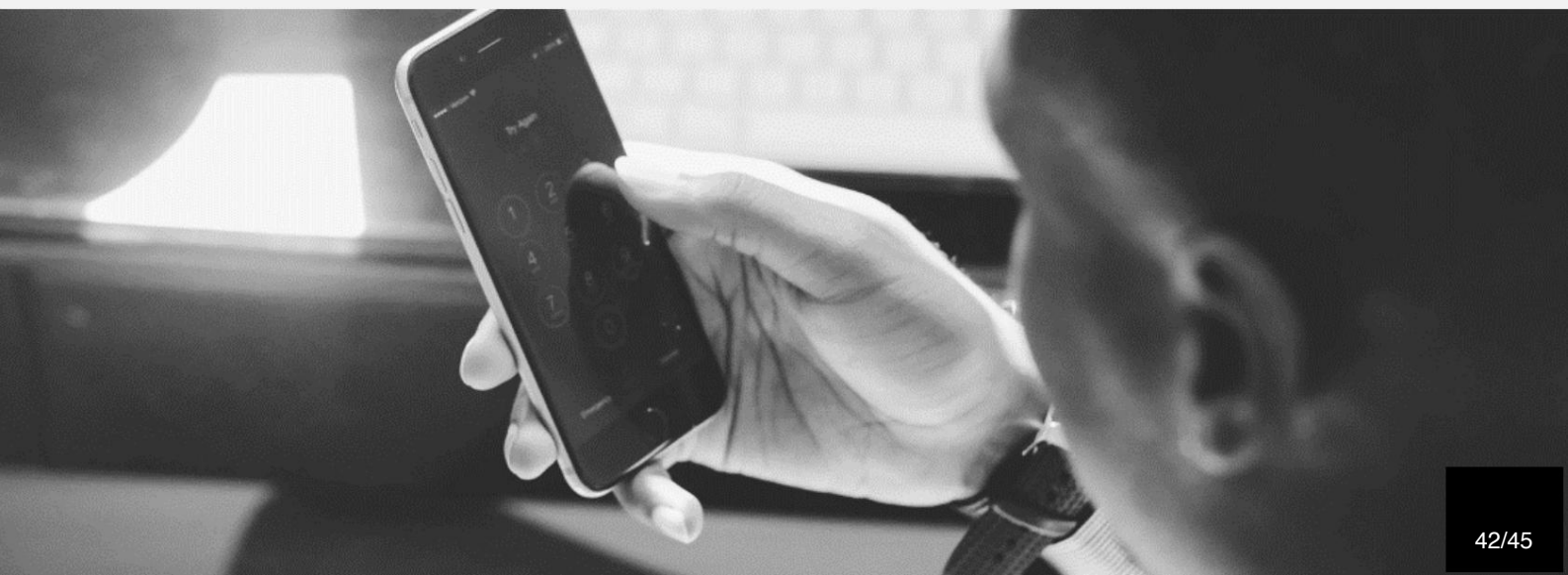
Any problems that arise or any reports submitted will be treated with the utmost confidentiality, and the person who reported the problem in good faith will be protected from any form of retaliation, discrimination or retaliation.

THE Q AGENCY is committed to creating a work environment where any person affected by our Code feels free to report activities or incidents that may violate the provisions of the Code or its fundamental policies and procedures, or to inquire whether a particular activity or incident is a violation.

THE Q AGENCY strictly prohibits any type of retaliation against an individual who, in good faith, reports a violation of our Code and fundamental policies and procedures, as well as a violation of applicable laws, rules and regulations.

If you believe you have been subject to retaliation, it should be reported like any other violation.

If you are unclear about the duty to report and/or about retaliation, contact the Ethics and Compliance Department.



6.2

Internal investigations

We take seriously all reports of misconduct and which assume that all issues submitted are made in good faith and are real and legitimate.

The investigation of allegations regarding possible unfair or illegal behavior will be carried out exclusively by the investigation specialists from Ethics and Compliance Department using different investigative approaches and techniques in accordance with internal procedures and protocols.

This ensures that the quality and integrity of the investigation process is maintained. Investigations will be conducted with respect, discretion and protection of privacy and confidentiality, in accordance with THE Q AGENCY's needs to fully investigate the matter to the extent permitted by applicable laws.

We must also maintain the confidentiality of our conversations with the investigators working on the case.

If the investigators from the Department of Ethics and Compliance discovers criminal or illegal activities, THE Q AGENCY may report such activities to the authorities

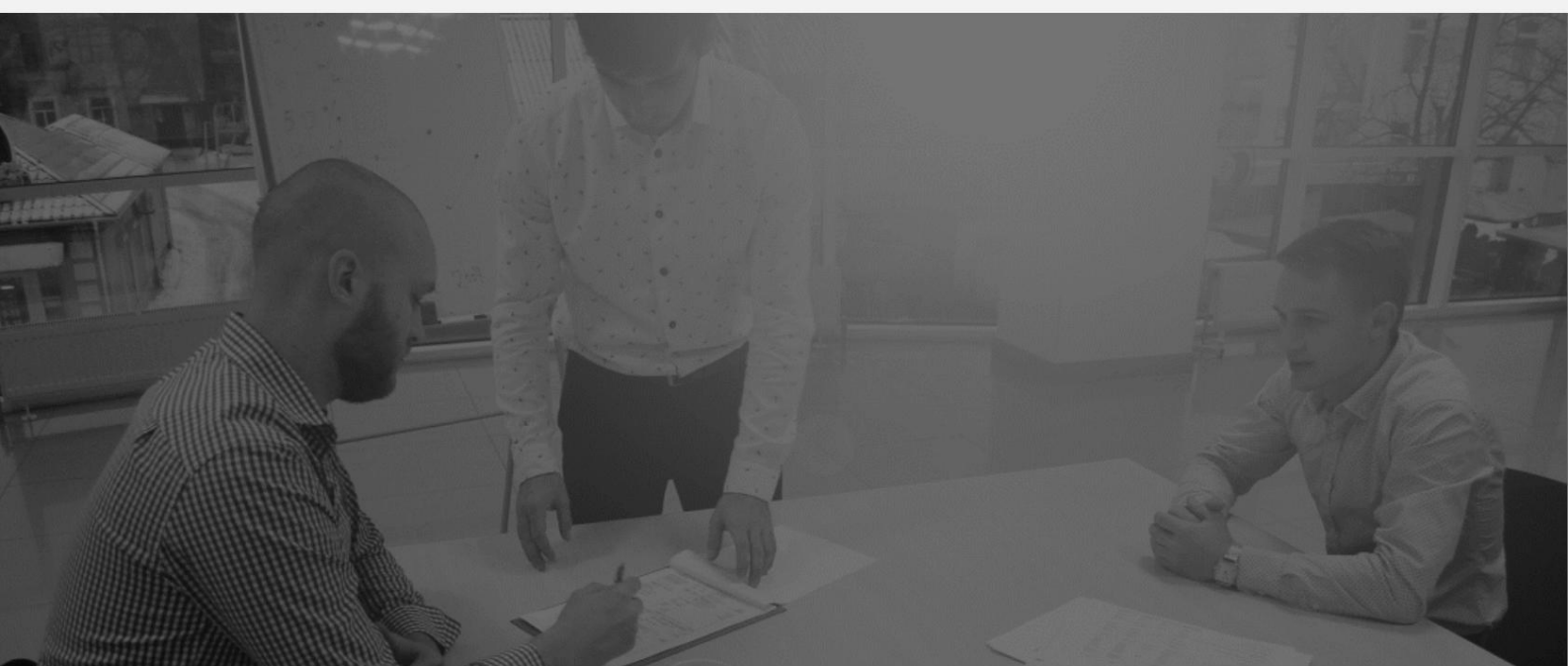
competent governmental, law enforcement or regulatory authorities.

We must cooperate fully, honestly and transparently with the investigators from the Department of Ethics and Compliance by making all documents and information available to them necessary.

We must not obstruct in any way or prevent or delay any internal investigation.

Lack of cooperation with investigators may result in disciplinary measures, including termination of the employee's employment or collaboration contract. that person.

Anyone charged is always presumed innocent unless facts undiscovered during the investigation prove otherwise.





Making the right decision

Certain decisions are easy to make. However, if you are unsure about actions or decisions that relate to your work, you should ask yourself the following questions:

- Is what I am doing legal?
- Does it respect THE Q AGENCY values, our Code and fundamental policies and procedures?
- Is what I am doing correct, ethical and morally acceptable?
- What do I think about this?
- How would I feel if this appeared in the news or on another forum public?
- Could my reputation or that of the Agency be negatively affected?
- It is possible that one could consider this to be a conflict of interests?
- Can the action (or lack of action) adversely affect the health, safety or well-being of a person?

If the answer to one of these questions is not clear or obvious, or if your answer does not seem right to you, you should ask for advice from someone in the list of resources available in the Contacts section.



Contact persons

When you have questions or uncertainties, you should always start by consulting with the person who best understands your work and responsibilities: **your direct manager.**

You can also communicate with the pre-set contact persons in the department or unit where you work. A detailed list of contact persons can be obtained from our website in the Ethics and Compliance section or via Q-Info.

[THE Q AGENCY/Q-Info](#)

In certain situations it is preferable to ask, discuss the problem or report a problem, complaint or suspected violation of provisions to someone outside your work environment. In these cases, THE Q AGENCY offers different communication channels to anyone who needs assistance:

COMPLIANCE CONSULTING CENTER

Our Compliance Specialists can provide information or advice to individuals who have questions or concerns about how to report ethics and corruption issues that may arise in the course of business and are responsible for ensuring compliance with the Code and fundamental policies and procedures.

compliance@theqagency.com

INTERNAL PAGE FOR ETHICS AND COMPLIANCE

The page gives you access to various resources on ethics and compliance issues, such as:

- 📄 Code of Ethics and Business Conduct,
- 📄 Fundamental Policies and Procedures,
- 📄 List of Compliance Officers and respective contact persons, 📄 Materials used in staff training and presentations, 📄 Answers to Frequently Asked Questions (FAQ), 📄 BPC Tool (the program for assessing the compatibility of business partners), 📄 The consulting center on compliance issues

[Compliance-Zone](#)

ETHICS AND COMPLIANCE HOTLINE

It is a secure online reporting system, operated through an independent and secure third party system, used to clear up any confusion associated with a decision or action that is not, or does not appear to be, carried out in accordance with our Code or policies and procedures its fundamentals.

Allows anonymous reporting

Access the system online at _____



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