



# GLOBAL CODE OF CONDUCT



PIONEERING DIAGNOSTICS



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## FOREWORD BY EXECUTIVE COMMITTEE & CEO

A world leader in *in vitro* diagnostics for more than 60 years, bioMérieux is committed to serving public health, in the fight against infectious diseases and antimicrobial resistance. Achieving this objective in the right way is also paramount to us.

bioMérieux requires all employees, including all members of management, to maintain high standards of integrity and to act with fairness and respect in all types of activities. The Global Code of Conduct provides the baseline expectations for working with others and illustrates our corporate values. Corrupt or unethical behavior is not tolerated at bioMérieux.

This document is an indispensable reference for each and every one of us, to help make the right decisions, at the right time, in an increasingly complex professional environment. Respecting this commitment to ethics and integrity is vital to carry out our work and continuously serve public health, our customers, the patients and all of our stakeholders.

We count on the engagement of all employees to safeguard our Company's core values and culture.

If you have any questions, your management, your Human Resources partner, the Legal Department and your Compliance Officer are available to assist you.



# 1/ OUR CODE OF CONDUCT: ORIGINS AND OBJECTIVES

## HOW WE WORK

Our Company has a strong reputation, based on values handed down through generations. These roots allow us to continue to grow as leaders in our field.

In order to maintain our leadership position, we must conduct our business activities in accordance with our ethical principles and in compliance with existing laws and regulations.

We understand that our expertise in infectious diseases and our international presence gives us an obligation to act as a responsible corporate citizen, serving the patients, the medical community, our customers, shareholders and all stakeholders of bioMérieux.

Through our commitment to the Code, we act on that responsibility in a tangible way.

### **The Code applies to everyone at bioMérieux**

The Code applies to all employees, subsidiaries, affiliates, officers and directors of bioMérieux. We also seek to apply the same principles expressed in the Code to our suppliers, customers, distributors and third parties.

### **Using the Global Code of Conduct**

The Global Code of Conduct is meant to guide our actions and help us integrate the Group's values into our daily professional lives. Our Code is publically available in several languages. We must all read the Code thoroughly to understand the Company's expectations and refer to it each time we have questions or concerns.

### **What if the rules in my country are different from what is written in the Code?**

Where local laws require a higher or additional standard, the local laws must be applied. If, by contrast, this Code provides for a higher standard, then the Code will prevail. However, if there is a conflict between local laws and this Code, please notify the Ethics & Compliance Department as defined in the "Reaching Out" section.

### **Violations of the Code**

This Code is more than words on paper - it must guide our actions as representatives of bioMérieux. Unethical or illegal behavior is not tolerated. Each employee in the organization is expected to strictly adhere to this Code. Any employee who violates this Code, or encourages, or authorizes such violation, will be subject to disciplinary action, up to and including termination of employment.

# OUR RESPONSIBILITY FOR THE CODE OF CONDUCT

## Ethics & Compliance is the responsibility of everyone

Through our Ethics & Compliance Program, we emphasize that our actions must be based on our core values. By following this Code, together with the Ethics & Compliance Program, we can avoid the potentially damaging consequences of non-compliance. Following this Code is the responsibility of everyone at bioMérieux. Our actions at work every day have a direct influence on the Company.

The Ethics & Compliance Department provides online and in-person mandatory training courses on topics that apply to you in the scope of your work at bioMérieux. This training is necessary to ensure that you know how to identify and avoid risks that could hurt bioMérieux or its employees. If you are a manager, you are responsible for making sure that your direct reports complete all assigned training.

Illegal or unethical behavior on the part of even one employee can cause significant damage. In many areas, the impact of non-compliance could result in costly fines, criminal prosecutions and destroy one of bioMérieux's most valuable assets: its reputation.

## Managers have special responsibility for the Code

A culture of ethics must start from the top. Managers should first and foremost model the values of the Code through exemplary personal leadership and ethical behavior. Managers are encouraged to promote the importance of compliance by making it a key consideration in decision-making.

All managers are responsible for the organization and supervision of the employees who report to them. Managers must ensure that their employees are aware of the Code and help answer any questions their employees may have. If there are serious concerns about the Code or behavior that may violate the Code, managers are expected to escalate those concerns to their management or to the Ethics & Compliance Department.

The managers' responsibilities do not relieve employees of their own responsibilities, but help to ensure that key messages of compliance are delivered, respected, and followed throughout their organizations.

## Local Compliance Team have responsibility for implementing the Global Code of Conduct in bioMérieux's affiliates

Our ethical principles extend to every place we operate. For this reason, we have established Local Compliance Team in each site that are responsible for supporting the development of ethics and compliance. These teams help ensure that corporate policies, as well as local laws and procedures, are understood and applied, and must escalate serious compliance concerns to the Ethics & Compliance Department. Additionally, we have a network of data privacy representatives covering all sites. The Code is meant to guide our actions and help us integrate the Group's values into our daily professional lives.

# REACHING OUT

bioMérieux encourages a culture of openness where employees can feel comfortable raising concerns. This openness is essential for an effective Compliance Program. Without it, problems go unreported and uncorrected and may trigger negative consequences. We are counting on you to help us maintain the best ethics and compliance program possible. You are "on the ground" and in the best position to prevent actions that are inconsistent with this Code. By expressing your questions and concerns when a potential issue arises, we can help you resolve problems.

## How do I contact Ethics & Compliance?

You are encouraged to reach out to your **Regional Compliance Officer** directly or contact Ethics & Compliance through [Compliance\\_Officer@biomerieux.com](mailto:Compliance_Officer@biomerieux.com). The Global Data Privacy Officer can be reached at [PrivacyOfficer@biomerieux.com](mailto:PrivacyOfficer@biomerieux.com).

## Who should I tell if I have a serious concern?

When you observe a behavior that you believe violates our Code, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of your management team, who will escalate the concerns to the proper channels. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. You can always seek help from the **Ethics & Compliance Department** directly or report your concerns through the **EthicsLine**. We encourage you to report confidentially rather than keep the information to yourself.

## What is the EthicsLine and how do I make a report?

The EthicsLine is a confidential reporting tool to assist management and employees in working together to address corruption, fraud, or other serious misconduct in the workplace. The subject matter that can be reported through the EthicsLine varies by country, depending on local laws.

In most countries, you may express your concerns confidentially in your own language through our EthicsLine. Reports may be made online or by phone. For more information on the EthicsLine and frequently asked questions, visit the Ethics & Compliance page on the intranet under “Expressing Concerns.”

## Will I get in trouble for reporting something?

Employees who express a genuine concern will not be subjected to retaliation, retribution, or any form of harassment. No employee at any level is permitted to engage in such retaliation, retribution, or harassment against any other employee for expressing a concern in good faith. Managers may not in any way discourage employees from taking concerns or complaints to the proper channels, including Ethics & Compliance, Human Resources and Legal.



2/

# WE PRODUCE AND SELL QUALITY PRODUCTS TO IMPROVE PUBLIC HEALTH

## TARGETING QUALITY AND SAFETY

When it comes to healthcare, accuracy and attention to detail are not only important, they can mean the difference between life and death. Preventing misdiagnoses or mistreatment is at the heart of what we do.

We produce high-quality products that are essential to the health of those who depend on them. In all of our functions, we have a special responsibility to ensure that safety and quality are clear priorities.

### THINK FIRST

- Comply with legal and regulatory requirements, as well as internal policies and procedures.
- Ensure that high-quality standards are applied at each stage of the manufacturing process.
- Immediately report any concerns related to product non-conformity.
- Immediately report customer complaints related to our medical products to the local Customer Services and Quality function/department.

## INTERACTING WITH HEALTHCARE PROFESSIONALS

The ultimate purpose of bioMérieux's interactions with healthcare professionals (HCPs) is to enhance the quality of patient care and improve public health. HCPs are critical to our mission and provide valuable assistance in developing our products, executing clinical trials, and helping patients with our products.

We must never offer or provide anything to an HCP with the intention of inappropriately influencing him or her to prescribe, recommend, purchase or supply our products. There must be a legitimate business reason for all of our interactions with HCPs. Remember that the healthcare industry is highly regulated: what might be considered acceptable business practices or courtesies in other sectors may not be appropriate when interacting with HCPs. We must follow the Corruption Prevention Manual, local rules and policies, and industry codes of conduct (such as AdvaMed and MedTech) for guidance on areas such as gifts, hospitality, and meals.

Under the laws of several countries, any transfer of value from our Company to an HCP must be recorded and reported to the government. These transparency laws can require us to report, among other things: gifts, meals, consulting fees, research agreements, and travel expenses. We are responsible for accurately recording and reporting any such payment through the relevant process.

### THINK FIRST

- Never offer or provide anything to an HCP with the intention of inappropriately influencing an HCP to prescribe, recommend, purchase or supply our products.
- Ensure that we follow local laws and regulations on promoting and marketing to HCPs, transparency laws, industry codes of conduct (such as AdvaMed and MedTech), and the Corruption Prevention Manual.
- Document the business justification for our interactions with HCPs and record payments in accordance with financial policies and procedures.

## PROMOTING AND MARKETING

Our products provide significant benefits to our customers and their patients. Being informed about our products and services helps our clinical customers to meet the needs of their patients. Providing this information in an accurate, transparent, and fair way is essential to put our products in the hands of those who need them.

Many regulations exist to protect patients from inaccurate or unfair marketing practices that could ultimately damage their health. In providing information about our products, you must be sure to respect all applicable laws, regulations, industry codes and our internal processes and standards.

### THINK FIRST

- Use only promotional or educational materials that have been approved.
- Never create your own promotional materials or alter approved materials without authorization and approval.
- Promote products only for their locally approved uses, as determined by local regulations.



## 3/ WE TRADE IN ACCORDANCE WITH THE RULES

### INTERNATIONAL TRADE

bioMérieux has customers and business partners all over the world. In international trade, the laws of one country may apply to transactions that occur in another country. Employees involved in international trade must be familiar and compliant with all applicable laws, regulations and restrictions relating to import, export, boycotts, customs and embargoes. Failure to follow these restrictions can lead to civil and criminal penalties, as well as the loss of import or export privileges.

#### Export controls

The transfer of items from one country to another is subject to laws and regulations referred to as "export controls". Commodities (goods and materials), technology (technical data and know-how) and software are all covered by these rules. Export controls also restrict the re-export of items from one country to another. The laws of a country from which an item originates or is produced may restrict or prohibit exports or re-exports to certain sanctioned countries.

Most countries have laws and regulations that restrict or prohibit exports to certain countries, organizations, and individuals. These restrictions are intended to prevent these parties from obtaining knowledge, materials, or technology that might be used to harm people or the environment. Many countries publish lists of "denied parties" that include, for example, identified terrorist organizations or narcotics traffickers. bioMérieux must respect these lists by ensuring that it does not do business with denied parties.

#### Import and customs laws

Any tangible or intangible item that is brought into one country from another country is an import and is subject to importation and customs rules. As an importer, we are required to exercise reasonable care in determining the correct classification, value and country of origin for all imports.

#### THINK FIRST

- Understand the Company's policies and procedures on exports and imports, as well as the relevant trade restrictions.
- Have all necessary licenses and permissions prior to transferring anything from one country to another.
- Ensure that any information, such as import and export documentation, provided to governments is truthful, complete, and timely.
- Consult designated company experts if there are any questions or errors to address.

### INTERACTING WITH OUR BUSINESS PARTNERS WITH INTEGRITY

Our global network of suppliers and business partners is a critical asset for bioMérieux. Maintaining strong, mutually beneficial relationships with responsible suppliers and business partners is integral to serving our customers around the world.

#### Ethical expectations of suppliers and business partners

We strive to build business relationships with suppliers and business partners who share our commitment to ethical business practices. We expect any parties that we do business with to comply with bioMérieux's Charter for Responsible Purchasing.



This includes expectations that suppliers and business partners will:

- Comply with all laws and regulations in the countries where they operate;
- Refuse to participate in corruption in any way;
- Avoid and eliminate anti-competitive practices;
- Follow international trade laws;
- Take responsibility for the health and safety of their employees;
- Respect basic human rights, including the prohibition on child labor, human trafficking, and any other cruel, inhumane or demeaning practices;
- Comply with labor laws;
- Allow free association of employees; and
- Act in accordance with international standards and laws related to environmental protection.

### Supplier selection and fair treatment of business partners

We endeavor to partner with diverse businesses, allowing them the opportunity to present their products, services and expertise to bioMérieux. This includes small businesses and those owned by women, minorities, veterans and disabled persons. Suppliers should be selected based on price, quality, delivery, service, diversity and reputation, as well as their commitment to responsible environmental and ethical business practices.

#### THINK FIRST

- Conduct business fairly and honestly.
- Select business partners and suppliers on the basis of ability to meet Company interests, values and needs, free of personal conflicts of interest.
- Comply with Company policies and procedures on selection and management of suppliers and other business partners.
- Ensure that our suppliers understand our ethical expectations.
- Request remediation if we become aware of a compliance issue, up to and including the termination of contracts.

## RESPECTING FAIR COMPETITION

It is in our best interest to promote an industry where business practices are reputable. Most national and regional economic systems promote free competition as the best way to achieve progress that benefits consumers' lives. Fairness in our relationships with our competitors promotes trust from our consumers and makes our work easier.

Many business behaviors may be prohibited depending on the laws of the country where the conduct takes place.

#### THINK FIRST

We must refrain from conduct that violates antitrust and similar laws regulating competition. Some examples include but are not limited to:

- **Price Fixing:** Price setting among competitors, directly or indirectly, is a violation of anti-trust laws and is strictly prohibited.
- **Customer and Market Allocation:** It is illegal for competitors to agree that they will not compete for business, which includes agreements about how to divide up markets, whether by territory, product line or customers. Employees must never discuss or agree to a request or demand from a competitor or two or more distributors to divide up territories, products or customers.
- **Competitive Information:** While it is a common and permissible practice to gather information about competitors, it is strictly prohibited under competition laws and general business legal rules to procure competitive information through illegal, or unfair channels (e.g. stealing information or requesting information from competitor's former employees currently in bioMérieux employ). Further, no confidential information belonging to a third party should be obtained or kept in the absence of such third party's express acceptance (e.g. a signed confidentiality and nondisclosure agreement).
- **Unfair advertising:** It is illegal to use comparison of bioMérieux's products with similar competitors' goods in promotional or advertisement campaigns, if such comparison is not based on actual objective studies or data.

## NO TOLERANCE FOR CORRUPTION

Businesses like ours have an integral role in the global effort to stamp out corruption and influence peddling.

**Corruption is the willingness to act dishonestly or fraudulently, directly or indirectly, in return for personal gain.** A person in a position of power who is illegally paid to make a decision that favors the payer has participated in corruption - and so has the payer. Corruption increases the cost of doing business, creates unfair competition, damages innovation, and undermines social structures. In addition it delays, distorts and diverts economic growth and deepens poverty.

Influence peddling is a type of corruption that occurs when a person uses real or apparent influence over someone in a position of public authority to obtain undue favors or preferential treatment for someone else, in return for an advantage or payment.

bioMérieux is committed to conducting its activities free from the unfair influence of bribery and corruption, including influence peddling. No bribe or other improper advantage must ever be given, directly or indirectly, to obtain an unfair advantage. **We have zero tolerance for corruption at bioMérieux.** In addition, our business partners (such as distributors, contractors, or agents) should commit to the same ethical standards that we expect from our employees. Improper advantages can be anything of value, including bribes, kickbacks, illegal rebates, under-the-table payments, gifts, entertainment, or travel expenses.

### Relevant policies

We have adopted a Corruption Prevention Program which includes:

- A Corruption Prevention Manual;
- Principles of Business Conduct for Third Parties; and
- A process for selecting and working with intermediaries.

All employees are expected to carefully follow the Corruption Prevention Program for all business transactions.

### What about gifts, hospitality, and travel?

You may not provide any benefit (directly or indirectly), including gifts, hospitality or travel to a customer (actual or potential) or government official that is intended to, or might be perceived to, unfairly influence a business decision. In many countries, laws limit or ban the provision of meals, entertainment, or gifts to these individuals. The Corruption Prevention Manual provides you with detailed information on this topic and must be followed.

Keep in mind that perception matters. Something that you give could look like an improper payment regardless of your intention. You must avoid even the appearance of bribery.

#### THINK FIRST

- Refuse to participate in or authorize corruption, bribery or influence peddling of any kind.
- Follow all applicable laws and internal rules regarding interacting with the government and healthcare professionals, as outlined in the Corruption Prevention Manual.
- Ensure that our third parties are aware of and commit to our ethical standards with regards to corruption and bribery.
- Alert the Ethics & Compliance Department if there is a question or concern about potentially corrupt activity.

## ENSURING FINANCIAL INTEGRITY/ ANTI-MONEY LAUNDERING

Many people rely on bioMérieux to maintain accurate and honest financial records, including our employees, our shareholders, tax authorities, governments, and the public.

We must ensure that our business operations are properly recorded in accordance with applicable accounting standards. We have set up financial policies and procedures to ensure that we comply with those standards, as well as with laws and regulations.

bioMérieux prohibits any participation in money laundering. **Money laundering is the process of disguising the nature and source of money connected with criminal activities (such as corruption, terrorism, or drug trafficking) as legitimate commerce where the true source cannot be identified.** Any irregularity that is detected regarding the country of origin or the financial institution involved in a particular transaction should be investigated and reported to internal resources (such as Ethics & Compliance, Internal Audit, Export Control).

#### THINK FIRST

- Follow internal financial policies and procedures.
- Never make false, misleading or deceptive entries.
- Provide fair estimates, analysis, or information to appropriate representatives so that assets and liabilities can be properly valued.
- Ensure that we are working with legitimate business partners who do not participate in criminal activities.
- Cooperate with our internal and external auditors.
- To avoid external fraud schemes, always check that a request for sensitive information is valid by confirming the source of the request.

## RECORDS MANAGEMENT

Our commitment to integrity is bolstered by the proper creation, maintenance, and disposal of accurate business records. These records are valuable assets for bioMérieux and should be carefully managed and protected. Proper recordkeeping is an essential part of compliance.

### Contracts and other legal agreements

Valid and enforceable legal documentation strongly supports the Company in achieving its business objectives and protects it from serious business, legal, and ethical risks.

Without legal documentation, it can be difficult to enforce a business arrangement if there is a dispute or litigation. It can also be difficult or even impossible to recognize revenue in accordance with accounting standards, or hold another party accountable to our standards.

We must be particularly careful to document services provided to bioMérieux by intermediaries such as consultants, advisors, agents, specialists, or distributors. Payments to such parties should be carefully set to correspond fairly to the services provided and must be properly entered in the Company's books. Compliance and ethical obligations must be documented to ensure that the intermediaries are fully accountable to our Company's standards.

#### THINK FIRST

- Ensure all commitments between bioMérieux and third parties (individuals or companies) are documented in a written agreement, purchase order or other relevant appropriate legal document.
- Ensure the review, validation and final approval and signature of legal documents conform to Company processes and procedures.
- Ensure compliance and ethical obligations of both the Company and the relevant third parties are clearly stated.

### Record retention and destruction

We are required by the laws in the countries where we do business to maintain certain types of records for specified periods of time. Failing to comply with global and local rules could subject the Company to penalties, fines and other sanctions or put us at a serious disadvantage in any future legal proceedings (e.g. litigation, regulatory audits). In addition, we must remember that our records are our responsibility - we must be able to defend any documents that we create.

#### THINK FIRST

- Maintain and destroy documents according to the local legal requirements and internal record retention policy.
- Consider carefully whether a record is necessary (such as an email) before writing.
- Remember that we must take responsibility for any documents that we create.
- Record information that is factual and objective, not misleading or exaggerated.
- Think about the audience who may read a record, both intended and unintended (such as the media, the government, or shareholders).



## 4/ WE ENSURE THAT WE PROCESS DATA ETHICALLY

### RESPECT FOR PRIVACY AND PERSONAL DATA PROTECTION

Privacy is a fundamental right under Article 12 of the Universal Declaration of Human Rights of 1948 and bioMérieux is committed to maintaining the confidentiality of personal data. Many countries have stringent regulations that restrict the use of personal information. Such laws require that companies take adequate measures to ensure the confidentiality, integrity, and availability of personal information.

Any employee with access to personal information must agree to adhere to the personal data protection rules and collect, use and disclose personal information only in accordance with the internal bioMérieux rules and the local laws.

"Personal data" means any information relating to an identified or identifiable natural person; an identifiable person is an individual who can be directly or indirectly determined by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

#### THINK FIRST

Data must be :

- Processed lawfully, fairly and in a transparent manner in relation to the data subject (individual).
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('Data minimization').
- Accurate and, where necessary, kept up to date.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Processed in a manner that ensures appropriate security of the personal data.
- Transferred from one country to another only after seeking legal or compliance advice.

When required, data subjects must:

- Be informed of the existence and the purpose of any processing involving their personal data.
- Have the right to access, rectify, and object to his/her data.
- Promptly report to Global Data Privacy Officer any potential misuse or loss of personal data.

### BIOETHICS AND RESEARCH COMPLIANCE

**Bioethics is the study of ethical issues raised by advances in biology and medicine.** It provides pathways for resolving ethical questions that arise in all types of clinical situations. bioMérieux is committed to protecting the health of individuals and the public by actively considering bioethical implications whenever engaging in biomedical research.

## PATIENT DATA PROTECTION

As a healthcare company, bioMérieux has access to **personal data in a healthcare context, known as patient data** – which is very sensitive information. bioMérieux is committed to the protection of patient health information and compliance with applicable regulations concerning its use and disclosure. **Patient identifiers**, including but not limited to, name, social security number, telephone number, postal code or medical record number **are considered Protected Health Information (PHI)**. PHI must not be processed for purposes other than patient treatment, payment or healthcare operations. Disclosures of PHI must be limited to the minimum necessary to achieve the permitted purpose. Authorized employees must commit to maintain the privacy and the confidentiality of any patient data/PHI.

### THINK FIRST

- Ensure adherence to international bioethics standards.
- Provide accurate information to patients and volunteers regarding the use of their samples and data for research purposes.
- Maintain confidentiality regarding patients and volunteers. As an example, we must not use the names of individuals who take part in our research (notably via their samples or their data) as identification.
- Communicate results of research in accordance with international standards.
- Ensure our partners in research, such as biologists, physicians, and sample providers, share our values.



## 5/ WE CARE FOR THE WELL-BEING OF OUR STAFF

### COMMITMENT TO EMPLOYEES

Rooted in a forward-thinking, humanist tradition, bioMérieux seeks to attract and develop talent that is innovative and rich in professional and cultural diversity. We are committed to fostering an inclusive, safe work environment where employees can reach their full potential.

bioMérieux has made a commitment to the laws and several international conventions, including the Universal Declaration of Human Rights of 1948 and the United Nations Guiding Principles on Business and Human Rights of 2011. Since 2003, bioMérieux has been a member of the UN Global Compact, an international initiative under the auspices of the United Nations that aims to address the problems generated by globalization.

We also respect the Fundamental Conventions of the International Labor Organization (prohibition of child labor and forced labor, respect of the freedom of association), promotion of diversity, women's rights, respect for the rights of people to use their natural resources and the right to health.

## Maintaining a healthy and safe work environment

We all have a right to a healthy and safe working environment. Every employee has a responsibility to take reasonable precautions to prevent harm to people by maintaining a secure work environment, including being compliant with health, safety, and environmental requirements.

### Substance use and abuse

bioMérieux is committed to maintaining a healthy and drug-free work environment. Possession or use of a substance (other than prescribed medication) that could create a hazardous condition is strictly prohibited in the workplace. Impairment from drugs or alcohol will not be tolerated. Employees who are taking a prescription drug that may interfere with their workplace responsibilities should consult their local Human Resources contact for guidance.

Any employee who handles substances that have a potential for abuse or misuse, must comply with bioMérieux's policies and local regulations regarding the proper handling and storage of these substances to prevent diversion for illicit use.

### Prohibition on workplace violence

The safety of employees is a clear priority. bioMérieux strictly prohibits employees from making threats or engaging in violent acts against fellow employees or any individual conducting business with the Company. Any act or threat of violence in the workplace by or against an employee is forbidden.

Employees must not bring a weapon or any other potentially harmful item or substance into the workplace or onto the premises.

#### THINK FIRST

- Conduct our work in a safe manner.
- Consider our actions carefully, so that we are not putting ourselves or others at risk.
- Know and comply with the law and related company policies in areas that are subject to safety and environmental regulations.
- Strive to continually improve occupational health, safety and environmental performance.
- Ensure that any substances that can be abused or misused are properly handled.
- Report dangerous conditions, and other health, safety or environmental conditions immediately.

## RESPECTING HUMAN RIGHTS

### Diversity, non-discrimination and harassment

bioMérieux is committed to an environment of equal employment and advancement opportunity for all qualified individuals. The diversity of our employees is a strength that is promoted and supported throughout the Company. Our commitment to diversity includes making reasonable accommodations to assist those with disabilities and social needs.

bioMérieux prohibits behavior that singles out an employee or group of employees in a negative way because of their gender, age, race, ethnicity, national origin, religion, marital status, sexual orientation or identification, disability, illness, genetic information or any other characteristics protected under applicable laws. All aspects of the employment relationship, such as hiring, assignments, promotion, compensation, discipline and termination must be made without regard to these characteristics.

bioMérieux supports and promotes a work environment that is free of harassment in any form. bioMérieux will not tolerate offensive or abusive behavior in the workplace that creates an intimidating or hostile environment. The Company will not tolerate harassment of an individual for any reason. In particular, bioMérieux prohibits sexual harassment, including unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct that is sexually discriminatory.

### Human rights

As a Global Compact member, bioMérieux promotes and upholds international law on Human rights. bioMérieux condemns the use of forced labor and exploitative child labor. We comply with all laws regarding slavery and human trafficking.

#### THINK FIRST

- Support and promote bioMérieux's commitment to inclusivity and diversity.
- Never discriminate against or harass anyone.
- Never engage in any act or threat of violence against another employee.
- Ensure fundamental human rights and compliance with labor laws.

## AVOIDING CONFLICTS OF INTEREST

Doing what's right is very important at bioMérieux. We must all work together to ensure that we build a company that makes decisions based on the merits, not personal interest. **Any relationship or personal interest that could keep an employee from making a fair, impartial business decision is a conflict of interest** and must be avoided.

Employees must not use their position to gain any direct or indirect profits for themselves or for friends or relatives. This includes taking advantage of any opportunity offered to bioMérieux for the employee's own personal benefit.

Receiving gifts, gratuities, fees, commissions or payments of more than a nominal value presents a conflict of interest for bioMérieux employees. If you are offered anything from a supplier, customer or any other business partner that could keep you from making a fair, impartial business decision, you should not accept it.

Employees should not accept or remain in any situation in which a relationship with friends or relatives could impact his or her ability to make objective judgments.

The use of bioMérieux's property and services should be only for bioMérieux's legitimate business purposes, not for an employee's personal benefit and never for any illegal or unethical purposes. The personal use of Enterprise Information Technology resources (email, internet, phone, etc.) should not interfere with work productivity and not exceed a nominal cost to the Company. These tools are the property of bioMérieux. Use of these, for purposes that are not job related, other than infrequent incidental personal use or for purposes that would violate any of bioMérieux's policies, including the policy against harassment, is strictly prohibited.

Outside employment that could potentially affect the performance of an employee's work at bioMérieux should be avoided. An employee must not serve any organization which might supply goods or services to bioMérieux, buy goods or services from bioMérieux or compete with bioMérieux without prior approval from the Compliance Officer.

### THINK FIRST

- Understand and follow bioMérieux's Conflicts of Interest Policy.
- Avoid situation where our personal interests conflict with those of bioMérieux.
- Disclose any potential conflict of interest to your Manager and Ethics & Compliance Department.



## 6/ WE INTERACT THOUGHTFULLY WITH OUR COMMUNITY

## PROTECTING THE ENVIRONMENT

bioMérieux's dedication to sustainable development reinforces our social commitment. In addition to following environmental laws and regulations, we implement programs and initiatives to minimize our environmental impact.

### THINK FIRST

- Comply with all environmental laws and regulations, including proper permitting and registrations.
- Strive to continually develop and improve our environmental management system to minimize our environmental impact.
- Identify, label and manage chemicals and hazardous materials that present a danger to the environment to ensure their safe handling, movement, storage, recycling or reuse and disposal.
- Establish internal systems for the early detection and assessment of potential environmental risks and take measures to mitigate or eliminate such risks whenever possible.

## SUPPORTING PHILANTHROPY AND CORPORATE SOCIAL RESPONSIBILITY IN LINE WITH OUR VALUES

As a public health leader with a global presence, we place patients and, more broadly, people, at the heart of our activities. We uphold our corporate social responsibility through support of a variety of initiatives.

As part of the Institut Mérieux Group, bioMérieux is strongly committed to public health. Most of our philanthropic activity is dedicated to support the actions of the Fondation Mérieux and the Fondation Christophe et Rodolphe Mérieux.

bioMérieux also supports initiatives in the countries where we have sites and subsidiaries. We typically select projects related to:

- Our Company's business or fields of expertise: *in vitro* diagnostics, the fight against infectious diseases, antimicrobial resistance, cancers and cardiovascular diseases;
- Our Company's mission, improving public health and contributing to access to healthcare, especially in emerging countries.

We give priority to projects that enable bioMérieux to be a corporate citizen in the communities where its sites and subsidiaries are located and to requests from organizations with recognized public interest status.

These donations are given voluntarily, as reflections of our values, without any expectation of favorable treatment by the recipient in return. bioMérieux never makes a contribution in exchange for a business favor or business advantage. Always follow the guidance found in the Corruption Prevention Manual when determining if a charitable contribution is permitted.

### THINK FIRST

- Comply with the Code when representing bioMérieux in any outside activities.
- Never donate or promise to donate to a cause, either personally or on bioMérieux's behalf, with the intention of gaining a business advantage for bioMérieux.
- Remember that donations made at the request of healthcare professionals or government officials are subject to special scrutiny.
- Never obligate any employee or business partner to support a particular philanthropic initiative.



## 7/ WE COMMUNICATE CAREFULLY

### HANDLING CONFIDENTIAL INFORMATION

Employees must always strive to protect and preserve the assets of the Company against theft, loss, damage, carelessness, waste and misuse. This includes our confidential information, whether in oral, paper, or electronic form. Confidential information can include, among other things:

- All information related to the invention, patent application, development or manufacture of any product, including drawings, performance statistics, manufacturing processes and data, test data or specifications;
- All information about employees, including compensation or benefits, personnel file (employee records);
- Company policies, procedures, work instructions and standards;
- Schedules of product releases;
- Information about the market for our products, customers, prices, contract terms and sales or marketing strategies and tactics, as well as information concerning our suppliers and competitive activities;
- Non-public financial information about the Company; and
- Non-public information about Company transactions, including transactions with customers, financial providers and vendors, or mergers & acquisitions and divestitures.



If it is necessary to disclose confidential information to outside parties, the appropriate parties must sign a Confidential Disclosure Agreement (CDA) before sharing any information. CDAs do not relieve employees of the responsibility to use care in deciding what information to disclose.

When a CDA is in place, we must respect the provisions as the Company may lose protection of its information or be exposed to damage claims if exchanges of information are not documented or other lapses occur.

#### THINK FIRST

- Share confidential information only with internal employees who have a legitimate "need to know".
- Avoid discussing or displaying confidential information in areas where it may be obtained by individuals without a "need to know".
- Comply with all internal and external rules for security regarding information technology and site access.
- Properly handle such information and prevent any misuse or destruction of it.
- Ensure that CDAs are in place and followed if we need to discuss confidential information with third parties.
- Be aware that the data we create on the Company systems remains the property of bioMérieux except information protected by local privacy regulations.
- Immediately report any incident that may compromise the confidentiality of sensitive information.

## ENSURING APPROPRIATE USE OF THE INFORMATION SYSTEM

The bioMérieux Information System is part of bioMérieux's assets. Its growing importance makes it essential to support our daily activities and its protection is a key objective for everyone.

Each user of the Information System must be aware of the expected practices, mostly based on common sense, in order to be an active contributor to the security of the information system.

#### THINK FIRST

- Secure our Information Systems access codes, including passwords, cards, and tokens by never sharing them.
- Connect only bioMérieux information technology hardware to the bioMérieux corporate network, unless we have Information System authorization or are using preauthorized remote connections.
- Avoid the introduction of malicious, pirated or non-approved software into the bioMérieux Group Information Systems.
- Never participate in security breaches or disruptions of Information Systems components.
- Only send or store confidential information outside of the bioMérieux Group network if it complies with confidentiality rules.
- Never use bioMérieux Group Information Systems to actively engage in procuring or transmitting information or material that is in violation of countries' local regulations and laws.
- Never loan your laptop to anybody without physical presence and control.

## RESPECTING INTELLECTUAL PROPERTY RIGHTS

To remain a leader in in vitro diagnostics, bioMérieux dedicates significant human and financial resources to create innovative products, processes or ideas in the technical, scientific, financial or business fields. Such information represents valuable assets for bioMérieux that must be protected with utmost care, physically and legally.

Physical protection includes such measures as password protection and encryption for electronic data or locked storage for paper documentation, care of electronic or paper mail and refraining from discussing confidential information in public places.

Employees must maintain the confidentiality of bioMérieux trade secrets and confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology.

All bioMérieux employees are strictly prohibited from appropriating any information learned from a third party while conducting their professional activities when it can reasonably be considered as confidential, plagiarized, or as an infringement of any intellectual property rights (including patents, copyrights, trademarks, domain names or trade secrets) of a third party.

### THINK FIRST

- Protect bioMérieux's intellectual property rights.
- Respect the confidentiality and rights of third parties.

## INSIDER INFORMATION AND TRADING

Insider trading relates to using non-public information as a factor in making an investment decision. Because the information is not available to other investors, a person using such information may gain an unfair advantage over the rest of the market.

Employees are not restricted from making personal investments, including purchases of Company stock, which do not violate Company policies including our Code for Market Trading. However, we must all be aware that using price-sensitive, non-public information as a part of an investment decision is prohibited by securities and stock market laws and regulations.

**Inside information is any information directly or indirectly concerning bioMérieux, that has not yet been made public by bioMérieux in an official press release, and that if it were made public, would be likely to have an influence on the price of the bioMérieux share or on the price of financial instruments associated with it.**

### THINK FIRST

To comply with securities laws, we must not:

- Buy or sell shares based on any information that becomes known to us through our professional activities with bioMérieux and is not available to the public.
- Share such inside information with any person.



## DIAGNOSTICS IS POWER

The power to fight infectious diseases



#pioneeringdiagnostics

A world leader in the field of in vitro diagnostics for over 60 years, bioMérieux is present in 45 countries and serves more than 160 countries with the support of a large network of distributors. In 2022, revenues reached €3.6 billion, with 90% of sales outside of France.

bioMérieux provides diagnostic solutions (systems, reagents, software and services) which determine the source of disease and contamination to improve patient health and ensure consumer safety. Its products are mainly used for diagnosing infectious diseases. They are also used for detecting microorganisms in agri-food, pharmaceutical and cosmetic products.

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