

EUROBIO SCIENTIFIC GROUP ETHICS CHARTER

Preamble

Since its creation Eurobio Scientific has focused on providing patients with the best diagnostics created and produced by our employees and/or our partners, and to put the patient at the heart of our concerns as underlined by our purpose of the current Eurobio Scientific Group:

“Improve patients’ quality of life through Specialty Diagnostics.”

Objective of Eurobio Scientific’s Group Ethic Charter

The purpose of the ‘Ethics and business conduct’ is to deter wrongdoing and to promote, among other things, honest and ethical conduct and to ensure to the greatest possible extent that the EBS’s business is conducted in a consistently legal and ethical manner.

Ethics in the conduct of our business is a priority. Our commitment to ethics is essential for our success because it reflects and impacts every aspect of our business with our clients, suppliers and subcontractors, the communication with regulators and shareholders, and interactions among the employees in our workplace.

Eurobio Scientific’s Ethics Charter describes the responsibilities and commitments that employees and management are required to adhere to at the Eurobio Scientific Group, including all of its subsidiaries throughout the world (hereinafter collectively referred to as “EBS”).

1. Ethical principles, the core values of EBS

• WELLBEING

We recognize that our employees' wellbeing is positively impacting the company's success.

We strongly believe that our employees are key contributors to this success, and we will value their unique contribution.

We will promote an entrepreneurial mindset and stimulate our employees' passion for innovation, collaborationve work & and creativity.

We will foster equal opportunities for all.

• COMMITMENT

We aim to meet healthcare needs by providing high-performance solutions.

We are quality driven.

We believe in long-term partnerships.

• RESPONSIBILITY

We care about patients.

We put our customers first.

We act responsibly for the environment.

• LEADERSHIP

We aim to be a frontrunner in innovative diagnostic tools and life sciences.

We act with integrity.

• SHARING

We believe in sharing information, knowledge and experience.

2. Compliance with Laws and Applicability of the Code Ethic Charter

All provisions of the Code apply to all EBS employees and subcontractors, to whom they will systematically and fairly be applied.

Respecting the Code means complying with applicable laws, rules and regulations. Our commitment to integrity begins with complying with laws, rules, and regulations. We understand and comply with the legal requirements, commercial practices of lawful business, and International Labor Organization standards.

We condemn all forms of illegal, unfair, unethical labor practice that exploits workforce, destroys social security or serves as tax evasion, including but not limited to undeclared and 'grey' work or holding back wages.

We conduct EBS business with full acknowledgment and enforcement of our ethical responsibilities. Where local laws are less restrictive than this Code, the latter must be respected, even if forbidden behaviors and actions would otherwise comply with applicable laws. If the law is more restrictive than the Code, compliance with the law prevails.

3. Respect of fairness in Hhuman Rresources management

All EBS employees are responsible for maintaining a professional environment which at all times :

- Merits the trust of our customers, partners, colleagues and shareholders;
- Enables excellence in execution;
- Cultivates creativity and innovation;
- Promotes integrity and respect;
- Encourages teamwork among colleagues and partners

EBS does not allow or tolerate discrimination against, or harassment towards any person, whether she/he be an employee, client or other business relation, by reason of his/her national origin, skin color, religion, marital status, gender, sexual orientation, age, physical or mental disability, pregnancy, political affiliation, or any other case provided for by law. All employees are required to comply at all times, with the terms and the spirit of this policy of non-discrimination and non-harassment.

EBS policy is to maintain a non-discriminatory workplace environment in which employees, clients and other business relations are treated with dignity and respect. We shall not, in any way, cause or contribute to the violation of human rights.

This is in line with the UN's internationally recognized Universal Declaration of Human Rights, in particular Article 2.

Subsequently, managers supervising employees or projects are specifically required to :

- Make all Human Resources decisions based on professional qualifications and performance;
- Providing equal opportunities in Human Resources management;
- Maintain a workplace that is free of discrimination, moral harassment, sexual harassment, bullying, intimidation and/or physical violence;
- Respect the privacy of employees, particularly in the context of transmission of personal information and in the processing of confidential personal documents.

4. Privacy, personal data protection

We respect people's privacy and we acknowledge customers, employees, and other natural persons' need to feel confident that their personal data is processed appropriately and for a legitimate business purpose. EBS is GDPR compliant, and our Privacy Policy is accessible to everyone and published on the website. The SOP's regarding the GDPR are included in our Quality Management System.

5. Business Behavior

All EBS employees are required to work honestly and fairly with other EBS employees, its suppliers, its business partners and its customers. All EBS commercial business and negotiations involving our sales staff must be conducted ethically, lawfully, and in accordance with market conditions. All commercial decisions must be based only on objective criteria.

EBS does not tolerate manipulation, concealment, abuse of confidential information, distortion of material facts or any other behavior that would negatively impact its reputation. EBS specifically prohibits bribes, fraud, extortion and corruption in the course of its business.

We neither permit the misuse of position, nor the facilitation (or grease) payments in order to secure or speed up routine actions.

6. Anti-corruption and bribery

EBS firmly condemns all forms of corruption and -bribery. We permit neither the misuse of position, nor the facilitation (or grease) payments in order to secure or speed up routine actions.

7. Fair competition and business conduct

EBS is dedicated to ethical and fair competition. We will make independent pricing and marketing decisions, and will not improperly cooperate or coordinate our activities with our competitors. Our relationships with business partners are built upon trust and mutual benefits, compliant with competition law. We commit to comply with all applicable trade controls, restrictions, sanctions, and import-export embargos.

Gifts, souvenirs and/or entertainment that are presented to employees are deemed as offers to EBS. However, an employee should decline an offer of advantage if acceptance could affect her/his objectivity, induce him to act against the interest of EBS, or will likely lead to perception or allegation of impropriety.

8. Gifts and Gratuities

EBS recognizes that reasonable gifts and gratuities between itself (including its employees) and its customers, suppliers and business partners contribute to building stronger relationships, recognizing particular efforts, and reflecting common social and commercial customs in the countries in which EBS operates. However, inappropriate or excessive gifts and gratuities may be contrary to ethics, laws and regulations, and such laws and regulations may also be violated if a gift or gratuity is perceived as an incentive to obtain preferential treatment or elicit a preferential behavior.

EBS therefore requires the following:

- Gifts, souvenirs and/or entertainment that are presented to employees are deemed as offers to EBS. However, an employee should decline an offer of advantage if acceptance could affect her/his objectivity, induce him to act against the interest of EBS, or will likely lead to perception or allegation of impropriety;
- EBS employees are prohibited from receiving any gift or gratuity. Gifts or gratuity do not include loans granted by financial institutions under normal market conditions, goods and services of a nominal value commonly used for promotions or business meals;
- EBS employees are prohibited from giving any gift or gratuity, as defined above, which aggregate value over a 12-month period is greater than €500, to an existing or potential customer, business partner, vendor, or potential supplier;
- All "gifts" with an aggregate value greater than €250 over a 12-month period shall be reported to the direct supervisor of the giver or receiver;
- Exceptions to the 12-month period €500 limit may be granted with the prior written approval of EBS' CEO. These exceptions will be considered on the basis of the particularly critical nature of the operations and success of EBS as long as such gifts remain in compliance with applicable laws. Gifts worth more than €500 from business partners and suppliers are likely to be perceived as potential attempts to influence EBS decisions, and cannot be accepted without the prior written approval of EBS' CEO.

In the context of employees relations with governments and public servants, EBS principles as well as relevant laws are more restrictive than those applicable for the private sector. EBS general policy is therefore not to give any valuable gift to individuals working for governmental administrations and institutions.

9. Political and governmental activities

In order to avoid any legal problems and problems related to its reputation, EBS requires that:

- While engaging in political, religious or social advocacy activities, EBS employees will not speak or act as if on behalf of EBS, and will never mention the name of EBS;
- Employees contemplating entering a government office or accepting a government position or mandate should inform EBS ExCo member;
- Employees wishing to participate in political activities should refrain from doing so during working hours or using EBS funds or resources, unless specifically agreed by EBS Board of Directors in the form of a letter written and signed by EBS' CEO.

10. Donations to political parties

EBS does not donate to political parties. No EBS employee is authorized to donate in cash or in any other form (including loans) to political parties or to affiliated organizations in the name of EBS. This obligation includes donations to political parties, to people affiliated to political parties, and to non-profit organizations involved in politics or in governmental administration.

11. Child labor

We do not resort to child labor in our activities. No individual below the legal minimum working age and/or wage can be employed at EBS.

12. Sustainability: people, profit and our planet

We are committed to meet business requirements without compromising the needs of future generations. To achieve this, we combine economic, environmental and social factors in our operations and our business decisions. We continually develop processes to better control environmental impacts and risks related to our activities. We strive to reduce these impacts and promote environment-friendly policies. The areas covered include the environmental impact of:

- Elimination of waste;
- Efficient use of limited or scarce resources such as energy, water and raw materials;
- Protection of biodiversity;
- Reduction of CO₂, methane and other gases and factors that have an impact on climate change;
- Reduction of environmental impacts such as noise pollution and pollution of water and of soil.

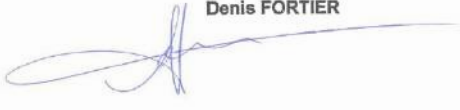
13. Direct communication

All entities of the EBS Group have a Confidential Advisor & Complaints Committee Undesirable Behavior.

EBS set up a confidential mailbox specifically dedicated to this Code. If an EBS employee has any question related to the Code, or wants to alert or report on any event or behavior that does not comply with the Code and/or applicable laws, she/he can send a message to ALERT@EUROBIO-SCIENTIFIC.COM. Anonymous messages are not acceptable and will be discarded.

France, Les Ulis, september 4, 2023

Denis FORTIER
CEO



Denis FORTIER

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