



# CODE OF CONDUCT

# **C**ABL

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AN INSTITUT MÉRIEUX COMPANY



“ ABL IS COMMITTED TO  
HONEST, LEGAL AND ETHICAL  
PRACTICES ”

**Thierry Van Nieuwenhove**  
Chief Executive Officer

*ABL is proud to present its Code of Conduct.*

*As a key player in protecting patient health, ABL is committed to honest, legal and ethical practices and to conducting its business with integrity and reliability.*

*It is a society-wide goal that begins with each individual. We are all responsible for the decisions and actions we take.*

*This Code is an essential reference for all of us to help us make the right decisions, at the right time, in an increasingly complex business environment.*

*Failure to comply with the Code can have serious consequences for individuals and the Company as a whole.*

*Therefore, we ask all ABL employees to read this Code of Conduct carefully, to ask any questions related to it, and to commit to maintaining and fostering high standards of integrity, fairness and respect in our daily work.*

*We count on the commitment of each of you,*

*Your CEO*

# A COLLECTIVE COMMITMENT

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Convinced that the involvement of the management team is an essential factor in bringing ABL's ethics to scale, the entire management team is committed to embodying all of the principles and values set forth in this Code of Conduct.



**Thierry Van Nieuwenhove**  
CEO ABL Group



**Stéphanie Colloud**  
General Manager ABL Europe



**Christian Gubiani**  
Site Director - Strasbourg



**Nicolas Salavin**  
Chief Technology Officer



**Aymeric Canu**  
Chief Financial Officer



**Arnaud Martin**  
Business Development Director



**Béatrice Barbier**  
Legal & Compliance  
Director



**Justine Chabrol**  
Communication & CSR Director



**Estelle Azoulay**  
Human Resources Director

# PREAMBLE

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**Within the framework of Institut Mérieux, ABL and the Group's subsidiaries and affiliates are firmly committed to Public Health.**

ABL's solid reputation is based on **values** handed down from generation to generation.

Our position as a manufacturer of medicines and a player in the **protection and improvement of health**, our expertise in the **safety of medicines** and our **international activity** require us to **always act in compliance with legal requirements**, implementing **high principles of integrity and ethics**, and behaving as a **socially responsible company**.

The purpose of this Code is to set forth the compliance and ethical principles that apply to ABL and to each officer, director, employee, agent and contractor of the Company.

This Code of Conduct will also govern our relationships with our **customers, suppliers, business partners** and more generally all ABL stakeholders.

This Code does not create an actual or implied contract between any employee and ABL, or a guarantee of any working condition.

Failure to comply with the standards set forth in this Code may result in disciplinary action up to and including **termination of the relationship with ABL**.



# IMPLEMENTATION & CONTACTS

ABL fosters a **culture of openness** where employees feel comfortable raising concerns and asking questions about the Code of Conduct and its implementation.

If you notice any **non-compliance** with our principles or the laws in force, please let us know as soon as possible via our **ethics line** at the following address: [www.ableurope.alertcenter-ikarian.eu](http://www.ableurope.alertcenter-ikarian.eu).

ABL will promptly and thoroughly investigate any complaint and take appropriate action.

You may also ask any questions you may have regarding the use of your **personal data**, in accordance with the General Data Protection Regulation and the French Data Protection Act in its latest version, at the following address: [compliance@ableurope.com](mailto:compliance@ableurope.com).

**Any questions or information reported will be handled carefully by ABL management.**

We remind you that communications or complaints must always meet the criteria of **truthfulness**, **clarity** and **completeness**, and must not be used to achieve any purpose other than those set forth in the Code of Conduct. **No one who expresses a genuine concern will be subject to retaliation, punishment or any form of harassment.**

No employee at any level is authorized to impose such retaliation, sanctions or harassment against another employee for expressing a concern in good faith.

# DEFINITIONS

**Corruption** is the willingness to act dishonestly or fraudulently, directly or indirectly, in return for personal benefit.

A person in a position of authority who is **illegally paid** to make a decision that **favors the person making the payment** is guilty of Bribery, as is the person making the payment.

**Institut Mérieux** represents the duly registered **holding company** to which several companies belong.

**Money laundering** is the act of concealing the nature and source of money related to criminal activities (such as bribery, terrorism or drug trafficking) as legitimate business when the true source cannot be identified.

**Personal Data** means any information relating to a person that allows that person to be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to that person's physical, psychological, mental, economic, cultural or social identity.

**Subsidiaries** means any legal entity constituting a subsidiary owned directly or indirectly by ABL.

## OUR VALUES

**ABL's actions are in line with Institut Mérieux's historical ethical values** and it intends to perpetuate these values.

**ABL has defined three values which constitute its DNA** and which must guide our interactions in society and with our customers and partners:

**TRUST**

**CREATIVITY**

**HUMILITY**

# RULES OF CONDUCT

“ABL IS COMMITTED TO PROVIDING ITS SERVICES INDEPENDENTLY AND WITHOUT INTERFERENCE”

These rules of conduct apply to all **employees** and **affiliates**, **directors** and **officers** of ABL.

**Each employee is required to comply with the ABL Code of Conduct.** Each Group company is responsible for ensuring that the internal Code of Conduct is distributed to all employees.

Like Institut Mérieux, ABL also seeks to extend the rules to the company's **suppliers** and **customers**.

## 1 DEVELOP & PRODUCE HIGH-QUALITY SERVICES

We understand that the **quality** of our services is critical to our customers and **patient safety**. That's why ABL has created quality management systems and policies, and is committed to providing reliable, quality services through **optimal performance**, while complying with international regulations.

**At ABL, decisions are based on scientific results, analysis and value**, not on personal interests or relationships that could lead to unfair or unbiased business decisions.

To ensure and maintain the high degree of quality and trust with our clients, **ABL is committed to providing its services independently and without undue interference** from clients or third parties.

# 2 ABSENCE OF CONFLICTS OF INTEREST

Conflicts of interest and situations that reasonably present the appearance of a conflict shall be avoided.

As a general rule, we must **always act in the best interests of our clients**, using **common sense** and not allowing private interests to interfere, or appear to interfere, with client **safety**.

Receiving gifts of more than nominal value presents a potential conflict of interest for employees.

**Gifts received or given must scrupulously respect the following rules:**

- Be **of a reasonable amount and conform to the established rules** (*see Gifts & Invitations Procedure*)
- **Never be of a financial nature**: loan, cash or cash equivalent (e.g. voucher)
- **Not be subject to any compensation**
- **To be done in full transparency** towards the hierarchy
- **To be declared**, if necessary, on public sites and in particular in France the public database Transparency - Health

**If in doubt about the value or appropriateness of a gift, refer to your supervisor.**

In addition, you should not accept or remain in a situation in which personal investments, other than employment or consulting roles, business opportunities, or a relationship with friends or relatives, could affect your ability to exercise objective judgment.

**Conflicts must be disclosed and handled with openness and transparency.**



# 3 RELATIONS WITH BUSINESS PARTNERS

## RELIABLE FINANCIAL STATEMENTS

ABL is committed to maintaining accurate and honest financial records at all times.

We must ensure that our business transactions are properly recorded in accordance with applicable accounting standards and our internal financial policies and procedures.

## MONEY LAUNDERING PREVENTION

ABL is committed to complying with all anti-money laundering laws that prohibit companies from accepting or processing the proceeds of criminal activity.

The Company expressly prohibits participation in any activity or transaction designed to disguise the nature and source of funds related to criminal activity (such as bribery, terrorism or drug trafficking) as legitimate business when the true source of the funds cannot be identified.

## CORRUPTION PREVENTION

ABL is committed to conducting its business free from undue influence by any Corruption, and in accordance with the anti-corruption laws applicable wherever the Company operates.

You may not offer or make a bribe to any public official or entity, political party or candidate, employee, or business owned or controlled by a public body, for the purpose of influencing official action or inaction, or obtaining, retaining or directing business.

You shall not engage in any form of **Corruption** or **fraud**, including but not limited to **embezzlement, theft, concealment or misuse of ABL assets**, or **falsification** of records and reports.

## RESPECT OF FAIR COMPETITION

ABL promotes free competition as the best way to move forward for the benefit of customers and the public health.

The **fairness** of our relationships with our competitors encourages customer **confidence**.

We strive to collaborate with various companies, giving them the opportunity to present their products, services and expertise to ABL.

This includes **small businesses** and those owned by **women, minorities, veterans** and **people with disabilities**.

Suppliers are selected based on **price, quality, delivery, service, diversity** and **reputation**, as well as their commitment to **responsible environmental and ethical business practices**.

## COMPLIANCE WITH REGULATIONS ON INTERNATIONAL TRADE

ABL has **customers** and **business partners** all over the world.

**International trade laws** control where we can send products and services, or from where we can receive them.

Compliance with import, export, boycott, customs and embargo regulations is a priority to create sustainable international trade.

Raw materials (goods and materials), technology (technical data and know-how), and software all fall under these regulations.

# 4 RESPECT OF THE COMPANY'S ASSETS

## PROTECTION OF INTELLECTUAL PROPERTY RIGHTS

ABL's **intellectual property rights** (our trademarks, logos, copyrights, trade secrets, "know-how" and patents) are among our most valuable assets.

**Unauthorized use** of these may result in their **loss** or **serious loss of value**.

**You must respect all of the Company's intellectual property rights and never use the Company's logos, trademarks or other proprietary information or assets in any business or commercial venture without prior written consent.**

Likewise, respect the intellectual property rights of others.

**Improper use** of third party intellectual property may expose you and ABL to **criminal and civil penalties**.

## PRIVACY PROTECTION

Our company dedicates significant **human and financial resources** to create **innovative processes and ideas** in the technical, scientific, financial and commercial fields.

All this information represents **valuable assets** that must be protected with the utmost care.

**The confidentiality of the Company's trade secrets and confidential information must be protected.**

**Trade secrets** include information about systems development, processes, services, products, productivity models, performance indicators, financial plans, strategic and expansion plans, know-how and technology, and other confidential customer and operational information.

If it is necessary to disclose confidential information to external parties, the parties involved must sign a **Confidential Disclosure Agreement (CDA)** before any information is shared.

**CDAs do not relieve us of the responsibility to be careful when deciding what information to disclose.**

**Failure to document** information exchanges or any violation of the provisions of the CE may expose the Company to **loss of protection** of its information or to claims for **compensation**.

## USE OF THE COMPANY'S ASSETS

**ABL products and services are used only for ABL's legitimate business purposes**, not for personal benefit and never for illegal or unethical purposes.

**We must always strive to protect the Company's assets** from theft, loss, damage, neglect, waste and misuse.

**Personal use of the Company's information technology resources** (e-mail, Internet, telephones, etc.) shall not interfere with **job performance** and shall not expose the Company to **more than a nominal cost**.

# 5 PROFESSIONAL FILES

## — WRITE IT DOWN

The Company's commitment to **integrity** is reinforced by the creation, retention and proper disposal of **business records**.

These records are valuable assets that must be **carefully managed and protected**.

**Record keeping is an essential part of compliance.**

## — RETENTION & DESTRUCTION OF RECORDS

The **laws** of the countries in which we operate require the Company to retain certain **records** for **specified periods of time**.

Failure to comply with global and local rules could result in **financial penalties, sanctions** or **serious disadvantages** in future legal proceedings.

In addition, everyone should remember that **ABL is responsible for the records it holds**.

ABL must be able to defend any document created by its employees.

**Employees are required to follow ABL's record retention and destruction policies and related laws applicable in the countries where the Company operates.**

It is our policy **not to destroy or alter our records or documents in response to or in anticipation of a legal proceeding, request for information, or government investigation.**

**You may not alter, destroy, or conceal a record to interfere with its availability in an official proceeding.**

## **— CONTRACTS AND OTHER LEGAL DOCUMENTS**

**Valid and enforceable legal documents** greatly support the Company in achieving its business objectives and protect us from serious **business, legal and ethical risks.**

Without proper legal documentation, it can be difficult to enforce a **commercial agreement** in the event of a **dispute** or **litigation.**

It may also be difficult or impossible to **recognize revenue in accordance with accounting rules,** or to hold another party liable to ABL.

**Careful documentation of services provided to ABL by intermediaries such as consultants, advisors, agents, specialists or distributors is essential.**

Payments made to such parties shall be **carefully determined to accurately reflect the services provided** and shall be **appropriately captured in ABL's records.**

## **6 COMMITMENT TO ABL TEAMS**

As a public health company with a global presence, **we put people at the heart of our business.**

**ABL respects the fundamental Conventions of the United Nations.**



## HEALTHY & SAFE WORKING ENVIRONMENT

Employee safety is one of our top priorities.

All employees of the Company have **the right to a safe and healthy work environment**.

It is your responsibility to take **reasonable precautions** to prevent injury to persons by maintaining a **safe work environment**, including **compliance** with appropriate or local health, **safety** and **environmental** requirements.

**Any violence or threat of violence in the workplace, by or against an employee, is prohibited.**

**You may not bring a weapon or other potentially dangerous item or substance** into the workplace or work premises, except as required by law.

**ABL prohibits its employees from making threats or using violence** against co-workers or anyone doing business with the Company.

## DIVERSITY

We are committed to fostering an **inclusive environment** of **equal employment opportunity** and advancement for all qualified individuals, in which employees can achieve their **full potential**.

The **diversity** of our people is a **strength** that is encouraged and supported throughout ABL.

**Our commitment to diversity includes making reasonable accommodations to help people with disabilities and social needs.**

**ABL prohibits conduct that adversely targets an employee or group of employees because of their sex, age, ethnicity, national origin, religion, marital status, sexual orientation or identification, disability, illness, genetic information or other characteristics under applicable law.**

All aspects of the employment relationship, such as hiring, promotion, compensation, discipline and termination must be considered independently of these characteristics.

## **PREVENTION OF HARASSMENT, DISCRIMINATION & BULLYING**

**ABL supports and encourages a work environment free from harassment, discrimination and bullying in any form.**

**ABL will not tolerate offensive or abusive behavior** in the workplace, including unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a harassing or discriminatory nature.

## **DRUGS & ALCOHOL**

ABL is committed to maintaining a healthy, drug-free work environment.

**The possession or use of any substance (other than prescription drugs) that may create an unsafe condition is strictly prohibited in the workplace.**

**Illegal drugs are strictly prohibited** on our facilities or at sponsored events.

**Alcohol consumption is always subject to prior authorization.**

Use **common sense** and never drink in a way that affects your performance or engages in inappropriate behavior, endangers the safety of others or violates the law.

# 7 CORPORATE SOCIAL RESPONSIBILITY

## HUMAN RIGHTS

ABL promotes and supports international human rights law.

ABL condemns the use of forced labor and the exploitation of child labor.

We comply with all laws relating to slavery and human trafficking and expect our customers, suppliers and business partners to do the same.

## ENVIRONMENT PROTECTION

ABL is committed to ensuring the **sustainable development** of its activities in accordance with **environmental laws and regulations**, with **the intention of minimizing our environmental impact**.

**Internal operating systems** are in place and must be continuously monitored and improved to **identify, label and manage chemical and hazardous materials** that pose an environmental hazard to ensure that they can be **handled, moved, stored, recycled or reused safely**.

## SUPPORT OF PHILANTHROPY

Within the framework of **Institut Mérieux**, philanthropic activity within the **Public Health** area is at the heart of our action.

We prioritize initiatives that respond to requests from **organizations declared to be in the public interest**.

These donations are made **voluntarily**, reflecting our values, **with no expectation of favorable treatment in return** from the recipient.

**ABL never makes a contribution in exchange for a commercial favor or benefit.**



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