



ETHICAL BUSINESS PRACTICES

ABL

AN INSTITUT MÉRIEUX COMPANY

OUR PARTNERS

“ WE MAKE A POINT OF MAINTAINING
RELATIONSHIPS WITH BUSINESS
PARTNERS WHO SHARE OUR
ETHICAL PRINCIPLES ”

At ABL, we value our responsibility to the local communities in which we operate and to the global community at large.

Our commitment to **high quality service and ethics** is a result of our **involvement** with these communities.

ABL's principles, policies and procedures adhere to the highest ethical standards. That's why we make it a point to maintain relationships with **business partners who share our ethical principles** and are committed to the same approach.



By "partners" we mean any person, public or private company, association, foundation or organization that supplies us with items (suppliers) or services (providers) or works on our behalf (subcontractors).

OUR EXPECTATIONS

Our primary goal is for you to make an unconditional commitment to comply with the laws and regulations in the countries where we operate. In addition to the legal framework, we expect you to be **fully committed to ethical and fair business practices.**

We are aware that all of these principles may come up against cultural diversity. Our expectations have therefore been established taking into account this **diversity factor** (laws, cultural habits...).

OUR KEY PRINCIPLES

1 BUSINESS ETHICS & MARKETPLACE FAIRNESS

All of your activities must be conducted away from the harmful influence of corruption and bribery. No bribery, illegal gifts, or any other type of improper payment will have any place in your partnership with ABL. Improper payments are defined as the offering of anything of value, directly or indirectly, to influence, fairly or unfairly, a business relationship. This includes bribery, bribes, inducements or gifts to a public official, customer or potential customer, supplier, contractor or any third party for the benefit of such persons.

It is essential that you comply with all applicable anti-bribery laws, including, but not limited to, the Sapin II Act, the Criminal Code, the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act (UKBA), as well as all other laws enacted under the Organisation for Economic Co-operation and Development (OECD) Anti-Corruption Convention.

Under no circumstances should you give, promise or offer payments or gifts (of any value) to any public officer or official or government official. This includes ministers, secretaries, legislators, judges, elected officials, candidates, and any official or agent of a public international organization and, in some countries where the hospital system is government-controlled, physicians and hospital employees.

You must not induce or permit others to offer or make improper payments as described in this section. Similarly, you may not solicit or receive improper payments or induce others to do so.

You must not offer benefits (free goods/services, business contracts...) to ABL employees (including alumni) in order **to facilitate business relationships** with the company.

You must not have any conflict of interest that would impair your ability to make business decisions with integrity.

Conflict of interest strictly refers to "any situation of interference between a public interest and public or private interests that is likely to influence or appear to influence the independent, impartial and objective exercise of a function" (Law 2013-907 of October 11, 2013).

A "conflict of interest" occurs when your private interests interfere in any way, or even appear to interfere, with the interests of your company. You must avoid, and ensure that your employees, suppliers and contractors avoid, any relationship, influence or activity that may interfere, or even appear to interfere, with your ability to make objective and fair decisions in the course of your work. A conflict of interest situation may arise when you perform a service, have had or have a business relationship or make a financial investment that makes it difficult for you to perform your job objectively and effectively for your company. Conflicts of interest may also arise when you or your colleagues or family members receive personal and undeserved benefits because of your position in your company in connection with the business relationship with ABL.

If this is the case, you should immediately report it to your company and to ABL in order to find a solution in line with the anti-bribery scheme.

You must adhere to and enforce the principles of **fair competition** and **comply with all applicable laws and industry codes.**

Your business dealings with us must be **honest** and **fair**. Do not manipulate or use tricks to gain an unfair advantage over our competitors.

It is your duty to maintain **accurate accounting records** and **consistent financial reporting**. You must also have **internal financial control reports**.

You must ensure compliance with international trade laws: the various authorizations required for the import, export or re-export of goods must be obtained before transferring a service or items from one country to another.

2

CONFIDENTIALITY & INFORMATION INTEGRITY

It is imperative that you protect all confidential information received from our company. You should never use it for personal gain.

You are required to comply with applicable local laws regarding the collection, storage, use, retention and disposal of personal information.

Any information you provide to us must be truthful and fair and must not be used for misleading purposes.

Do not use or share non-public materials or information about ABL for your personal benefit or the benefit of others.

3

FAIR WORK & RESPECT OF HUMAN RIGHTS

ABL strongly condemns any use of forced labor as well as the exploitation of children at work. We therefore require such a commitment from you as well as compliance with, in particular, the Devoir de Vigilance Act No. 2017-399 of March 27, 2017 and, more generally, with laws relating to slavery and human trafficking in all countries in which you do business. **It is also your responsibility to ensure that your suppliers and subcontractors comply with these laws.**

We expect you to put processes in place to ensure that:

You have never used forced labor, whether mandatory, required or involuntary in prison.

You never use child labor. Note that the employment of young workers under 18 years of age must be limited to work that is free of any danger, a condition that also applies to older workers

You provide a work environment free of harassment and discrimination (age, gender, color, religion, disability, ethnicity...).

You pay your employees in accordance with current legislation, including minimum wage, overtime and mandatory benefits.

The work environment is healthy and safe and respects the dignity and privacy of individuals. Employees are able to communicate easily with management about working conditions without the threat of retaliation, intimidation or harassment.

You respect the rights of workers by allowing them to join a union or the employees' committee.

You must not take part in any acts of violence, terrorism or sectarianism. It is your duty to ensure that no third party with whom you collaborate is involved in such activities.

4 RESPECT OF HEALTH & SAFETY

You must ensure **compliance with health laws and regulations** and thus respect the health and safety of your employees but also your suppliers and subcontractors and the surrounding communities.

All your employees must be made aware of and trained on possible health risks.

Suppliers shall:

- **Be proactive** in occupational health and safety by establishing a team/coordinator responsible for defining and implementing a Health & Safety policy and a management system including emergency response plans.
- **Provide protective equipment** to employees and ensure access to satisfactory medical assistance and facilities.
- **Establish internal systems for the early detection and assessment** of physical, chemical and biological hazards in the workplace and take all necessary measures to mitigate or eliminate these hazards as soon as possible.

5 RESPECT OF THE ENVIRONMENT & ANIMAL HEALTH

You must comply with all environmental laws and regulations (national and local).

Always strive to minimize your impact on the environment in a spirit of continuous improvement.

Identify and manage environmentally hazardous chemicals and ensure their safe handling, transportation, storage, recycling and disposal.

Suppliers and subcontractors must have internal systems for early detection and assessment of environmental risks and take all necessary measures to eliminate these risks or, failing that, to mitigate them.

Animals must be treated with dignity, including measures to reduce pain and stress. Animal testing must be abandoned when alternative solutions are deemed scientifically valid and acceptable by regulators.

ANTICORRUPTION GUIDE

CORRUPTION - understood in its strictest sense - refers to the fact that a person invested with a specific function (public or private) solicits or accepts **a gift or an advantage of any kind with a view to performing, or refraining from performing, an act within the scope of his functions.**

French criminal law distinguishes two kinds of corruption:

- **Passive** corruption (articles 432-11 and following of the Penal Code) when a person exercising a public or private function takes advantage of his or her function by soliciting or accepting gifts, promises or advantages in order to perform or refrain from performing an act of his or her function. This person is qualified as **corrupt**.
- **Active** bribery (articles 433-11, 445-1 et seq. of the Criminal Code) when a natural or legal person obtains or tries to obtain, in return for gifts, promises or advantages, from a person exercising a public or private function, that he or she performs, delays or refrains from performing an act of his or her function or an act facilitated by him or her. This person is qualified as a **briber**.

These two offences, although complementary, are **distinct and autonomous**. Their perpetrators can be prosecuted and judged separately.

Corruption is said to be "**public**" when the bribe taker is a public official and "**private**" when the bribe taker is a person working in the private sector.

HOW TO FIX IT?

Due to **increasingly strict international regulations** and the significant damage corruption causes to the public good, companies must focus on **internal controls** to counter any risk of corrupt practices. Thus, countering corruption begins with the commitment of every employee to respect these business practices and to demonstrate **zero tolerance** for any dishonest act.

SOME ADDITIONAL INFORMATION

Your employees and business partners should be aware of this Policy. ABL expects you to adhere to the principles in all your business dealings on behalf of and in the interest of our company.

We have the ability to evaluate the performance of our partners, either directly or through approved third parties, and to conduct surveys of our suppliers and subcontractors to validate the application of our principles.

ABL is entitled to separate from partners who do not respect the principles set out in this Charter and/or the laws and regulations applicable in the countries where they work.

REPORTING

If you become aware of any **non-compliance with our policies, laws or industry codes**, please report it to us as soon as possible at www.ableurope.alertcenter-ikarian.eu or to your contact at our company.

ABL will not tolerate retaliation against anyone who demonstrates good faith in reporting a suspected violation of this Policy.

The **General Data Protection Regulation**, as well as the **French Data Protection Act** in its latest version in force, offers you the possibility to consult your personal data (including photos, videos, name, first name, telephone number, e-mail address) and to delete your personal data present in our databases. You can also make a request for the "right to portability or deletion" or "right to consultation and rectification" by simple request to our Legal and Compliance Director at the following address: compliance@ableurope.com.

SANCTIONS FOR NON-COMPLIANCE

Always with a view to **zero tolerance of dishonest and fraudulent practices**, any deviation from this Charter may lead to the immediate termination of our order or contract, the payment of damages as well as the reporting of your actions to your management, notwithstanding the possible civil or criminal sanctions to which you may expose yourself and/or your company.

Your full adherence to these business practices is a prerequisite for entering into a contractual relationship with ABL.



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