

Supplier Code of Conduct

Message from our General Manager

"Since its creation, Biocorp has placed innovation at the service of one objective: to improve patients' quality of life. This objective goes hand in hand with an adaptation to societal and environmental changes because we are convinced that meeting these challenges is an essential lever for pursuing our growth and building a sustainable future.

Our Corporate Social Responsibility (CSR) commitments are at the heart of our strategy. We cannot keep these commitments alone. We firmly believe that their efficiency is also based on the involvement of our partners, starting with our Suppliers. A common adherence to these principles forms the basis for a sustainable, balanced and mutually beneficial trading relationship.

Therefore, I invite you, as a future Supplier of Biocorp, to adhere to Biocorp's commitments by complying with this Code of Conduct. Built on our company's core values, this document embodies our expectations for fair practices and respect for human and environmental rights. It reflects our commitment to:

- *Ensure the respect and dignity of employees, their health, safety and privacy, as well as the protection of their personal data;*
- *Promote the rational use of natural resources and favour sustainable materials;*
- *Ensuring free and fair competition in the marketplace;*
- *Protect the intellectual property rights of our partners and competitors;*
- *Maintain exemplary integrity towards all stakeholders and strengthen Biocorp's image as a responsible player.*

The choice of our Suppliers is of strategic importance to Biocorp. Patients, our customers and our partners expect ethical and responsible behaviour from our company. This is why we ask that our Suppliers commit to respecting these principles from the first pre-contractual exchanges.

Biocorp undertakes to provide the necessary information and clarifications to ensure that the established principles are understood and implemented in accordance with the established principles.

We thank you for your collaboration, your support for our values and your contribution to a more positive social and environmental impact, as well as to building a responsible future."

Xavier JULIA
General Manager of Biocorp



Introduction

Based in France, Biocorp specialises in the development and manufacture of innovative medical devices and drug delivery systems. It is part of the Novo Nordisk group, a global leader in the field of healthcare and insulin.

As a member of SNITEM (the French National Association of Medical Technology Industry), Biocorp undertakes to comply with the organisation's Code of Ethics, which sets high standards of ethical practices and professional ethics. Furthermore, Biocorp's core values guide all of its actions, activities and undertakings to ensure fair practice, commitment to Corporate Social Responsibility (CSR) and duty of care.

INNOVATION

Putting innovation at the heart of its strategy allows Biocorp to anticipate market trends in a changing economic, social and environmental landscape. Identifying patients' future needs and designing sustainable solutions demonstrates Biocorp's ability to combine performance, responsibility and ethics.

FLEXIBILITY

Biocorp's strength lies in its employees' ability to adapt to ever-evolving techniques and constraints by exploring innovative approaches and adopting varied perspectives. This flexibility allows it to respond rapidly to the environmental and societal challenges associated with its activities.

QUALITY

Biocorp undertakes to ensure a high level of quality at every stage, whether it be project management, long-term relationships with its customers or the design, development and manufacture of its products. Biocorp's ISO 13485 certification demonstrates its expertise in the quality management of its traditional and connected medical devices. Biocorp prioritises the satisfaction and safety of its stakeholders while striving to reduce its environmental and societal impact.

**'A company,
women
and men,
3 values.'**

Biocorp's commitment to its Supplier

Biocorp fully complies with the principles set out and the commitments provided for in this Code of Conduct. Biocorp conducts its business in accordance with all applicable laws and regulations and expects its employees to meet these standards in the performance of their duties. They are reliable business contacts whom the Supplier can trust.

Biocorp's goal is to meet quality standards and to comply with commitments made regarding human rights and working conditions, sustainable development and business ethics, which it also requires of its Supplier. This Code of Conduct is in accordance with ISO 26000, as a key lever in addition to the CSR policy in place.

What Biocorp expects of its Supplier

The Supplier is chosen for its qualities and skills, know-how, expertise and ethics, which Biocorp shares. Compliance with the Code of Conduct is a prerequisite for any business

relationship with Biocorp, and helps strengthen the ethics culture within the company and its Supplier.

The Supplier is any entity that supplies products or services to Biocorp. This includes critical suppliers as well as subcontractors of Biocorp.

Thus, the provisions contained in the Code of Conduct apply without exception to all contractual and business relationships with Biocorp and its Supplier, as well as any person affiliated with the Supplier. However, because of its general scope, this Code is not tailored to each Supplier; therefore, any provision that is not applicable due to a Supplier's business will not be binding on that Supplier.

By undertaking to comply with this Code of Conduct, the Supplier states that it abides by the international standards, laws and regulations in force, as well as the principles set out herein. It also undertakes, wherever possible, to:

- ensure that its subcontractors and suppliers also comply with these;
- draw up its own Code of Conduct or guidelines to pass the principles on to its suppliers;
- raise awareness among its employees, carry out rigorous assessments of third parties and establish appropriate monitoring systems;
- develop and implement a training program for employees, subcontractors and suppliers affected by the issues covered in this Supplier Code of Conduct.

The Code of Conduct sets out the ethical standards with regard to human rights, employee working conditions, environmental protection and business integrity to which Biocorp adheres and with which the Supplier must comply throughout the business relationship.

Human, labour and social rights

Biocorp asks its Supplier to comply, and ensure that all of its subcontractors comply, with the fundamental conventions of the International Labour Organization (ILO). The Supplier therefore undertakes, on behalf of itself and everyone in its value chain, to respect the fundamental rights and freedoms of its employees, ensure their dignity and respect, and protect their health and safety in the workplace. It shall refuse or suspend any business relationship with a stakeholder that does not meet these requirements. It also guarantees that its whistleblowing system allows it to effectively collect and process reports of discrimination or behaviour that is contrary to these commitments.

Human rights and working conditions

The Supplier must not use forced labour or illegal or undeclared work. All employees must be free to choose their employer and terminate their contract, subject to the statutory notice period. The Supplier complies with applicable local child labour laws. It acknowledges that the minimum age for employment is 15, or 18 for work which is likely to harm the health, safety or morals of children.

The Supplier complies with the applicable daily and weekly working time limits and rest periods. It acknowledges that the maximum weekly working time is limited to 48 hours, including at least one weekly day of rest, unless provided otherwise in an applicable legal provision. It also guarantees that the wages paid to employees meet the legal thresholds and that overtime is properly paid.

The Supplier forbids any inhuman treatment, including corporal punishment, verbal abuse and harassment, as well as physical or mental coercion of any kind exercised on its employees. It does not tolerate any discrimination based on gender, age, ethnicity, origin, religion, disability or sexual orientation. It respects its employees' freedom of speech and freedom of association.

The Supplier also undertakes to promote diversity and inclusion in employment and professional development. It guarantees a working environment that promotes equal opportunities and ensures fairness. If required to do so, it undertakes to publish a gender equality index within its company.

Health and safety at work

The Supplier shall maintain high health and safety standards in all of its activities by ensuring a safe and healthy working environment, minimising as much as possible the risk of work-related illnesses and accidents. It is also required to identify and inform affected employees of workplace hazards, as well as the protection and prevention measures put in place.

The Supplier guarantees its employees decent working conditions that meet health and safety standards and are suitable for the kind of activities they carry out.

Environmental protection

The Supplier carries out all of its activities responsibly, keeping their environmental impact to a minimum. It takes all necessary measures to:

- eliminate or reduce sources of pollution and greenhouse gas emissions generated by its activities;
- preserve natural resources, especially those that are non-renewable and critical;
- minimise the use of hazardous substances;
- promote recycling or reuse of waste.

Decarbonisation

The Supplier undertakes to contribute to the transition to a low-carbon economy by aligning its efforts with international greenhouse gas emissions reduction targets. It is encouraged to carry out a carbon footprint to assess its emissions, set a path towards decarbonisation and formalise its commitments.

Resource management

The Supplier takes all the necessary actions to optimise and reduce as far as possible its consumption of energy, water and non-renewable natural resources in the course of its business. It strives to reduce the use of raw materials and to favour recycled, sustainable or renewable materials.

Sustainable innovation

The Supplier undertakes to integrate sustainable innovation practices into all stages of the life cycle of its products.

Waste management

The Supplier promotes the reduction and recycling of waste within its sphere of influence. The Supplier ensures that its waste, especially hazardous waste, is stored securely in appropriate conditions at all of its sites and that it is correctly disposed of in approved facilities.

The Supplier is required to provide Biocorp with Safety Data Sheets (SDS) for its products. Biocorp takes environmental considerations into account to provide products with as low an environmental impact as possible throughout their life cycle. Biocorp encourages its suppliers

to take similar measures, in particular not to obtain minerals from conflict or high-risk zones and to comply with their due diligence obligations with regard to their supply chain by keeping proper documentation.

The Supplier organises environmental awareness-raising activities for its employees, such as workshops, materials and events.

Fair practice

Fair practice refers to ethical conduct in relationships between an organisation and its suppliers, subcontractors, customers and competitors. It includes anti-corruption, responsible political involvement, fair competition, promotion of social responsibility in the value chain and respect for property rights.

The aim of fair practice in relationships is to achieve positive outcomes while behaving in an exemplary manner and encouraging social responsibility throughout the organisation's sphere of influence. Ethical behaviour is essential for building legitimate and productive relationships. To this end, Biocorp asks its Supplier to work with it to build and maintain a long-term relationship, based on trust, mutual respect, transparency in dealings and good business practices.

It is therefore vital that the Biocorp Supplier undertakes to comply with the principles set out below.

Anti-corruption

Corruption refers to the abuse of power or influence to obtain illegal benefits, generally in exchange for bribes, favours or preferential treatment. It can be passive or active and involve private or public stakeholders. Under the standards in force, a Supplier that is guilty of corruption will face significant reputational damage and be subject to civil and administrative penalties.

The Supplier must undertake not to commit any offence, by action or by omission, and in particular to actively combat corruption in all its forms through appropriate measures within its company, as well as among its suppliers and value chain.

Thus, it is the responsibility of the Biocorp Supplier to take the necessary preventive measures to:

- comply with all anti-corruption and influence-peddling regulations;
- introduce 'anti-gift' and healthcare transparency measures, or any equivalent system, governing interactions between companies and healthcare professionals by limiting gifts, benefits or incentives that may influence business or medical decisions. The Supplier must publicly declare any benefits to the competent authority, thereby ensuring full transparency on relationships in order to protect the trust of patients and industry stakeholders;
- introduce a whistleblowing system as provided for in the Sapin II law (Law no. 2016-1691 of 9 December 2016), or any equivalent system requiring companies to establish a whistleblowing system allowing employees to report any illegal practices, in particular with regard to corruption and conflict of interest. The Supplier must protect whistleblowers from any sanctions, retaliation or discrimination;
- enforce transparency rules on corporate sponsorship, tax deductibility rules and compensation restrictions;

- implement and maintain its own anti-corruption policies and procedures;
- provide any assistance required by Biocorp to respond to a request from a duly authorised anti-corruption authority.

The Supplier undertakes not to make any decision based on any kind of hidden benefit or hidden conflict of interest, but solely on performance and the quality of products or services.

Responsible political involvement

The Supplier may support public policy development in the public interest while prohibiting any abuse of authority and behaviour such as manipulation, intimidation or coercion, which risk undermining the integrity of the political process.

The Supplier must be transparent as to its political involvement and must ensure that this does not lead to an attempt to control a policymaker. It must prohibit disinformation, misrepresentation and threats. To this end, it is important to take the necessary measures to assess and identify the persons chosen to represent the Supplier, in accordance with the provisions of the Sapin II law or an equivalent standard.

Fair competition

Biocorp is committed to the principles of free and fair competition and prohibition of anti-competitive practices. Broad and fair competition drives innovation, reduces the cost of products and services, ensures equal opportunities for all companies in the market, and encourages the development of new products and improved processes.

Anti-competitive behaviour can damage an organisation's reputation with its stakeholders and lead to unlawfulness. The Supplier must refrain from all forms of unfair competition, in particular:

- price fixing, where the parties agree to increase their prices at the same time;
- collusion in public procurement, where the parties agree to bid rigging;
- predatory pricing, which involves selling a product or service at a very low price in order to drive competitors out of the market and impose unfair conditions on competitors.

By refusing to participate in such practices, the Supplier helps to ensure fair competition that benefits everyone. To this end, the Supplier must:

- comply with its confidentiality commitments;
- not disclose business secrets or know-how identified as such;
- ensure that it has a variety of suppliers;
- comply with national and international standards, laws and regulations on the protection of free competition on national, European and international markets;
- undertake to cooperate with the competent authorities in the event of an audit of its practices.

Promotion of social responsibility in the value chain

The Supplier may influence other organisations when making purchasing decisions. It may promote the adoption and support of principles and practices of social responsibility, as Biocorp has done herein.

The Supplier should consider the potential impact (even if unintentional) of its procurement decisions on other stakeholders, anticipating and mitigating as far as possible any adverse effects. The Supplier may also boost demand for more responsible products and services. However, these actions cannot replace the role of the authorities responsible for implementing and enforcing the regulations, or lead to anti-competitive behaviour.

All organisations in the value chain are responsible for complying with the applicable laws and regulations and for their own societal and environmental impacts, in accordance with their duty of care.

To confirm their commitments in terms of social and environmental responsibility, the Supplier's procurement policies and practices must include the following criteria:

- ethics, such as guaranteeing fair pay for goods and services purchased by taking into account actual costs, prohibiting all forms of corruption in business dealings and ensuring traceability of financial flows;
- social, such as checking that their suppliers comply with core labour standards like the ban on child or forced labour;
- environmental, such as favouring suppliers who adopt solutions to limit their greenhouse gas emissions, use environmentally friendly raw materials (as far as possible), recycle or recover waste and do not make misleading environmental claims ('greenwashing');
- health and safety, such as the application of high quality and safety standards during manufacture and distribution of their products to ensure the health and safety of consumers;
- gender equality, such as wage policies that promote equal opportunities in their recruitment and remuneration process and combating discrimination.

Respect for property rights

Property rights are universally recognised. Their protection by economic actors boosts investment, strengthens economic and physical security, and encourages creativity and innovation. This includes land rights, copyright, patents, moral rights and traditional knowledge, as well as employees' intellectual property rights.

The Supplier is responsible for ensuring that its activities fully respect property rights, without infringing on the fundamental rights of others. This means in particular:

- ensuring that all natural or legal persons can have full enjoyment of their property rights, including possession, use and the ability to assign property or assets, free of undue constraints;
- fair compensation if property is acquired from a third party;
- not forcing a weaker actor to sell its goods or property rights at an unfair price;
- using the tangible and intangible assets of third parties for the purposes provided for and under the conditions laid down or negotiated;
- obtaining express permission for any use of their partners' name or image for advertising purposes;
- in the event of an infringement of property rights, promptly informing the person affected to ensure transparent and effective management.

When the Supplier protects its own property rights, it must also respect basic principles such as the right to privacy and confidentiality. This includes putting in place rigorous measures to protect sensitive information entrusted to it, as well as confidential business secrets, technologies or know-how.

Protection of personal data

Biocorp undertakes to comply with the applicable data protection laws and regulations, whether with regard to its employees, Suppliers or customers, partners and prospective customers. In particular, Biocorp has stringent protective measures in place for sensitive data, such as health data. Biocorp asks its Supplier to meet the applicable cyber security requirements, as well as to ensure the integrity of data collected on behalf of Biocorp or in connection with their business relationship.

If the Supplier acts as a personal data processor, it must enter into a written agreement with Biocorp specifying its data processing obligations. The Supplier undertakes to process the personal data provided by Biocorp exclusively for the set purpose and to implement appropriate technical and organisational measures to ensure integrity, security and confidentiality, ensuring that it can only be accessed by persons duly authorised by virtue of their duties and with an appropriate confidentiality commitment.

The Supplier must inform Biocorp as soon as possible of any security incident leading to the accidental or unlawful destruction, loss, alteration, disclosure or unauthorised access of personal data provided by Biocorp. The Supplier undertakes to cooperate fully with Biocorp to respond to requests from data subjects.

Whistleblowing system

The Supplier and its employees who are aware of violations or risks of violation of this Code and/or applicable laws are asked to report them confidentially and securely at the following address:

sustainability@biocorp.fr

For its part, the Supplier also has a whistleblowing system or procedure allowing its employees and stakeholders, including Biocorp, to report a breach or raise a concerning issue without fear of retaliation or adverse consequences.