



Ethics and anti- corruption Code



Your Health is our Priority

Preamble

All the employees and managers of Bastide Groupe share a common sense of service, help and empathy to help the weakest, the most vulnerable or those who suffer from illness.

Carrying out this mission implies respecting strong ethical principles and acting with integrity at all times, well beyond the obligations set by Laws or Regulations. The company was built on the trust of our partners, and it is on that same trust that we must build our competitiveness for the future.

It is in this sense that this Code recalls the Guidelines that each of us has to follow at any time of our activity within Groupe Bastide, to ensure that we always make the best choice. Nevertheless, such a document cannot deal exhaustively with the cases of unethical behaviour, corruption or trading in influence that are likely to occur in the course of day-to-day professional activities; it is therefore the duty of each of us to exercise our own judgement and use common sense. Should you are in any doubt about what to do, please check to the online training courses available on the SYNAPSE intranet or contact your designated "Ethics & Compliance Manager".

Although the values presented and set out in this Code of ethics is not a guarantee against Data Breach within Groupe Bastide, each of us need to work to prevent them and, if necessary, report them so that corrective measures can be taken as soon as possible.

This Code of Ethics is appended to the company's internal regulations. It is based on the Middennext code and refers to the United Nations Convention against Corruption and is designed to combat all forms of corruption.

Vincent Bastide
Chairman and Chief Executive Officer

1. FRAMEWORK AND SCOPE OF APPLICATION

This Code of Ethics applies to all entities (including subsidiaries) and contributors of Bastide Groupe. All employees are expected to behave in an exemplary manner within their company and not to do anything that contravenes the legislation and rules of conduct set out in this Code.

If we believe that any of the principles set out in this Code may not be applicable, you should contact your Ethics & Compliance Manager to seek for further advice.

If you identify, in good faith, what you suspect to be an issue or a breach of a law or rule in force, you must report this by using the means you consider most appropriate.

Please send your queries or complaints to:

compliance@bastide-medical.fr

or by post to :

BASTIDE GROUPE

Legal & compliance department

12, av. de la Dame

30 132 CAISSARGUES, FR

2. RESPECT AND PROTECTION OF INDIVIDUALS

Our Group is committed to prohibiting any behaviour that might undermine an individual's dignity. To this end, we cannot tolerate discrimination or harassment based on gender, sexual identity, age, origin, religion, physical appearance, health or disability.

In order to guarantee equality and diversity, we reaffirm that only skills, experience and personal attitudes should be used as a determining factor for recruitment or career development.

Our commitments (Global Compact, Responsible Purchasing Charter, etc.) place respect for the fundamental principles of the International Labour Organisation (child labour, forced labour, working hours, non-discrimination, etc.) at the heart of our relations with our stakeholders.

Protecting the health of our employees must remain a priority for everyone: it is the duty of each of us to comply with safety, health and environmental regulations. This includes in particular, compliance with instructions relating to the control of biological risks and prohibition of drugs, alcohol and smoking in the workplace.

Preventing risks and accidents in the workplace is everyone's responsibility within our Group: safety instructions must be respected, regular prevention training must be followed assiduously by every individual, and dangerous practices must be banned.

3. ENVIRONMENTAL CARE AND PROTECTION

Bastide Groupe is committed to promoting an attitude and approaches that favour environmental protection.

May it concern the relations with stakeholders or the performance of our duties, we need to favour solutions that minimise the impact on our environment and help to preserve biodiversity at all times.

4. CORRUPTION AND ILLICIT ACTS

Employees of the Groupe Bastide shall refrain from giving, promising to give or offering more to any individual in order to obtain that person to perform any act or take any decision. This rule is of general application and applies, in particular, to relations we may build with healthcare professionals or state officials.

These limitations are also extended to acts of the same nature that may be carried out by authorised intermediaries acting in the name and on behalf of Groupe Bastide.

Facilitation payments are implicitly considered as a corrupt practice and are systematically prohibited within Groupe Bastide.

To this end, we highly recommend all our employees worldwide :

- to comply with the Laws and Regulations on the prevention of corruption and illicit payments in force in each country we operate in;
- in case of doubt, to assess the situations or third parties with whom we should enter into an agreement by contacting your " Ethics and Compliance " Manager.

EXCEPTIONAL CASES OF GIFTS AND INVITATIONS

Gifts are benefits of any kind, given by an individual as a sign of gratitude or friendship, without expecting anything in return. Offering, or being offered, meals, accommodation and entertainment is considered as an invitation.

Gifts and invitations may be of similar nature or be perceived as acts of active or passive corruption, therefore care must be taken when it comes to gifts, signs of courtesy and hospitality (received or given) and invitations to entertainment, which contribute to establish good relationships, but can be considered as a means of influencing a decision or favouring a company or an individual.

Care must be taken to ensure that these gifts and invitations do not consist in prohibited advantages or have the effect of influencing a decision. In this respect, only gifts or invitations of reasonable value are acceptable.

The Group calls its employee to exercise the utmost vigilance with regard to Groupe BASTIDE's business sector and the relations that may be established with health professionals.

EXCEPTIONAL CASES OF DONATIONS TO CHARITABLE OR POLITICAL ORGANISATIONS

Requests for gifts, donations or contributions must be carefully considered, particularly those from individuals in a position to influence the company's activities or who could derive a personal benefit from the gift granted, where applicable.

Requests for donations must be approved by the highest level of management of the legal entity making the donation, and if necessary, in case of doubt, after consulting the "Ethics & Compliance" Manager in charge.

SPECIFIC CASES OF PATRONAGE AND SPONSORING

They must be carried out without conferring a specific advantage on the beneficiary other than promoting the company's brand image.

Brand image, sponsorship and sponsorship partnerships must be approved by the highest level of management of the legal entity granting the partnership, and if necessary, in cases of doubt, after consulting the responsible Ethics & Compliance Manager.

5. CONFLICTS OF INTEREST

Conflicts of interest arise from any situation in which employees' personal interests conflict or may conflict with their duties or responsibilities.

If circumstances give rise to a potential or actual conflict of interest, the employees concerned must report it to the Ethics & Compliance Manager.

Increased vigilance is particularly encouraged in the following cases:

- The offer of remuneration or work by a Group supplier;
- Holding or establishing a financial interest with a competitor, customer or supplier of the Group;
- Holding or acquiring a property with a view to selling it or renting it out against its interest, to the Group ;
- Soliciting personal benefits from a third party in a business relation ;
- Accepting a gift from a third party when the purpose of the manoeuvre is to facilitate business relations with the Group (see section on corruption).

We invite employees potentially affected by these conflicts of interest, or where such a conflict is identified, to contact the Group's designated ethics & compliance officer.

6. PROTECTION OF THE GROUP BRAND IMAGE

Protecting the Group Brand Image and reputation is a key concern for building trust with our stakeholders.

The scope of actions, including private actions, can be assimilated to a position of responsibility of the Group. All employees must :

- Use social media responsibly and measure private / public reach of what he had to say;
- Refrain from posting any comment or discussing any unfavourable activities or events relating to the Group ;

7. PROTECTION OF SENSITIVE INFORMATION AND CONFIDENTIALITY

Our Group works with patients and individuals whose data is particularly sensitive in terms of their personal and medical characteristics. Improper protection, misuse or disclosure of this data can seriously harm not only the individual concerned, but also the company.

It is therefore the duty of all of us to commit to :

- Protect personal data in accordance with the laws and regulations in force ;
- Make best efforts to store personal data only for a specific, legitimate and necessary purpose;
- Keep data within the time limits prescribed by the Law and Regulations;
- Use the most appropriate techniques available to the company to ensure the protection, safety and reliability of the personal data collected;
- Report any violations observed to the "Ethics & Compliance" Manager.

In addition, the Group handles confidential data used solely for internal purposes (finance, marketing, sales, etc.) whose disclosure shall be limited. Thus, every employee undertakes:

- To comply with the Group's confidentiality policy and to disclose the information in accordance with the IT Charter;
- To treat the information as strictly confidential and as such, to handle it with care and discretion (discussions, public places, etc.);
- to report any suspected data leakage, disappearance of information (paper or computer) or illegitimate investigation (unusual request for information from a third party, solicitation of an

unidentified or unqualified third party, etc.) to the Management and the Group IT Department without delay.

8. PREVENTION OF INSIDER TRADING

Insider dealing occurs when an individual carries out transactions on the publicly traded company's stock, whose subject or underlying asset includes shares of a company with which he / she has significant non-public information (material information), the implementation of which may have an impact on the value of these securities or derivatives.

Groupe Bastide defines an insider as any person who has confidential information which makes it possible to assess whether acting on the financial markets proves appropriate. Buying or selling shares or derivatives prior to the public announcement of information leading to an anticipated rise or fall in value shall constitute an Offence.

Groupe Bastide enforces the following measures :

- Compliance with the insider trading legal and regulatory provisions must be observed by all employees, whatever their function;
- Limited disclosure of confidential information only to the individuals who need to be educated;
- Confidentiality agreements or ethical undertakings aimed at guaranteeing the confidentiality of any insider information that may be disclosed only for those matters which require to do so;
- Referring to the "Ethics & Compliance" Manager in case of doubt;

9. SCOPE OF APPLICATION

COMMUNICATION AND TRAINING

Employees are required to become familiar with this Code; widely publicised by electronic means, and to take part in training sessions organised by the company to raise their awareness of the Anti-Corruption Policy. New employees are made aware of this Code as soon upon taking up their duties.

REPORTING CODE INFRINGEMENTS AND WHISTLEBLOWER PROTECTION

By following the procedure defined by the company, all employees can raise their doubts and/or questions to their line manager and/or the referent:

- If faced with a risk of corruption ;
- If it believes in good faith that a breach of the Code has been, is being or may be committed, it will be liable to prosecution.
be committed ;
- If it discovers that someone is suffering reprisals for having made a report in good faith.

Any employee who reports any violation or risk of violation of the Code to his /her Managers or to the Compliance Manage in good faith and in a disinterested manner, i.e. believing that this report is true and accurate to the best of his/her knowledge, shall be protected against all forms of reprisal. His/her identity and the facts shall be treated as strictly confidential pursuant to the legislation in force.

Furthermore, while a mistake made in good faith does not result in any disciplinary action, there are offences relating to speak up in case the report reveals deliberately abusive or malicious.
In case of emergency, you should notify compliance@bastide-medical.fr

PROFESSIONAL WHISTLEBLOWING AND PERSONAL DATA PROTECTION

In accordance with the regulations applicable to the protection of personal data in most countries in which the company operates in, and in particular within the European Union, any person identified in the framework of a Professional Whistleblowing Mechanism may exercise the right of access to data relating to him/her, no matter if he / she initiated the whistleblowing or is the subject of the whistleblowing process.

You may also request that your personal data be corrected or deleted if it is inaccurate, incomplete, ambiguous or out of date, by using the same procedures.

PENALTIES APPLICABLE FOR INFRINGEMENT OF THIS CODE

Employees who fail to comply with the rules will be held personally responsible and may be subject to penalties, including criminal penalties, in accordance with the applicable legislation.

The Company undertakes to :

- Consider any and all declarations ;
- Investigate alerts in a diligent manner;

- Assess the facts objectively and impartially;
- Take appropriate corrective action and disciplinary measures if necessary.

IMPLEMENTATION: RESPONSIBILITY AND MONITORING

It is the responsibility of every employee to contribute to the implementation of this Code within the scope of his/her own job duties.

The Company shall carry out periodic inspections to ensure compliance with the practices set out in this Code, and the results thereof be examined by the Group's governance bodies, as well as whistleblowing, as reported and investigated by the Chief Compliance Officer.