

Sebia code of business conduct *and ethics*



sebia 

The new language of life



SOMMAIRE

1.	Code of Business Conduct and Ethics: what is it useful for and who is it for?	4
2.	Respect for fundamental rights	7
2.1.	Respect for human rights	8
2.1.1.	Child labour, forced labour, slavery	8
2.1.2.	Freedom of expression and opinion	8
2.2.	Compliance with occupational health and safety regulations	9
2.3.	Working time, remuneration and training	10
2.3.1.	Working time	10
2.3.2.	Remuneration	10
2.3.3.	Training	10
2.4.	Equity, Inclusion and Diversity	11
2.4.1.	Gender equality	11
2.4.2.	Inclusion of persons with disabilities and respect for diversity	12
2.5.	Combating all forms of discrimination	13
2.6.	Combating all forms of harassment	14
2.7.	Labour relations	15
3.	Business conduct	17
3.1.	Information confidentiality and data protection	18
3.1.1.	Confidentiality	18
3.1.2.	Protection of personal data	18
3.2.	Respect of industrial and intellectual property rights	19
3.3.	Transparency and benefits for healthcare professionals	20
3.4.	Anti-corruption, influence peddling, conflicts of interest, gifts and invitations	21
3.5.	Combating fraud & duty of vigilance	22
3.6.	Anti-competitive practices	22
3.7.	Prevention of money laundering and terrorist financing	23
3.8.	Responsible procurement management	23
4.	Implementation of the Code of Business Conduct and Ethics	25
4.1.	Governance	26
4.2.	Distribution	26
4.3.	The whistleblowing procedure	26
4.4.	Consequences of non-compliance with the Code	27

Sebia is a specialist in vitro diagnostics and the world's leading supplier of clinical protein electrophoresis equipment and reagents for screening and monitoring various diseases, primarily in the areas of oncology (multiple myeloma), diabetes, haemoglobinopathy and other rare pathologies.

Today, Sebia has nearly 1,300 employees and is present in more than 120 countries.

Because of its activity, its market position and its worldwide presence, Sebia must be an exemplary player, a company that unambiguously respects the fundamentals of professional ethics on a daily basis.

Sebia is indeed aware that ethics are the mainspring of sustainable value creation and wants its business and projects to reflect this responsible and respectful vision.

This Code of Business Conduct and Ethics formally sets out the commitments made by our company.

It is structured around two pillars that organise our current and future actions:

1. Respect for fundamental rights

2. Business ethics

These two principles underpin Sebia's activity and form the basis of common rules that everyone, employees and partners alike, must respect.

1. Code of Business Conduct and Ethics: what is it useful for and who is it for?

This Code of Business Conduct and Ethics (hereinafter the «Code») forms part of Sebia's CSR approach.

This approach seeks above all to have a positive impact on our stakeholders, who include our employees, customers, partners and shareholders.

However, Sebia cannot have a positive impact without respecting the fundamental rights of individuals and without conducting its business honestly and with integrity.

This Code has been translated into several languages and shared with all Sebia employees worldwide and is made public to all external stakeholders on the company's website www.Sebia.com.

Indeed, the Code not only conveys the values and principles that guide our business but also presents our expectations and requirements to anyone involved in the success of our business. Our external stakeholders are therefore invited to sign up to it.

Sebia's Code of Business Conduct and Ethics is in line with several national and international laws, the principles of which Sebia shares, including:

- the United Nations Global Compact, signed by Sebia in May 2024, and its Ten Principles and 17 Sustainable Development Goals;
- the 1948 Universal Declaration of Human Rights;
- the main Conventions of the International Labour Organization, in particular Conventions 29, 105, 138 and 182 (child labour and forced labour), 155 (health and safety of workers) and 111 (anti-discrimination);
- the OECD Guidelines for Multinational Enterprises;
- the French law known as «Sapin II» of 9 December 2016;
- EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing directive 95/46/EC («general data protection regulation» or «GDPR») of 25 May 2018;
- DMOS (various social measures) ordinance No. 2017-49 of 19 January 2017 relating to the benefits offered by persons manufacturing or marketing health products or services;
- the law of 11 February 2005 «on opportunities, participation and citizenship for people with disabilities.

In addition to these universal, national and international rules, our group complies with the laws in force in the countries where it operates.





RESPECT FOR FUNDAMENTAL *RIGHTS*

Sebia attaches great importance to respect for human beings within its sphere of influence.

Sebia focuses on skill and is not interested in origin, gender, morals, sexual orientation, gender identity, age, family or pregnancy status, membership or non-membership, real or supposed, to an ethnic group, nation or alleged race, political opinions, union or mutual benefit activities, religious beliefs, physical appearance, state of health, loss of autonomy or disability and the ability to express oneself in a language other than French.

In addition to Sebia's efforts to create an appropriate and safe environment so that everyone feels respected, it is important that everyone feels responsible for the principles set out below.

2.1

RESPECT FOR HUMAN RIGHTS

2.1.1 CHILD LABOUR, FORCED LABOUR, SLAVERY

Sebia prohibits child labour (ILO Conventions No. 138 and 182) and any involuntary or forced labour (ILO Conventions No. 29 and 105) and complies in particular with the United Nations Guiding Principles and the OECD Guiding Principles on the subject.

Sebia rejects any form of child labour up to the age of 18 years, except for legal exceptions, provided that they comply with the international standards set out and prohibits, in any case, work that would endanger the physical, mental or psychological health, safety or morals of a child.

Sebia ensures the free and informed consent of its employees in the performance of their duties by drafting employment contracts in the employee's mother tongue.

Sebia employees are free to move around and leave their jobs.

Sebia expects its partners to respect the same commitments and has the right to terminate any commercial relationship with a stakeholder who violates these principles and does not share our values.

2.1.2 FREEDOM OF EXPRESSION AND OPINION

Sebia is committed to respecting the freedom of expression and opinion of everyone.

Each employee has the freedom to take part, in a personal capacity, in activities or organisations, in particular of a political or religious nature, insofar as these are carried out outside working hours and do not involve any Sebia property or use its image.

Furthermore, as each employee is an ambassador for Sebia, it is important to act with discernment in accordance with the values

and interests of Sebia and to ensure that they explicitly differentiate between their opinions or personal interests and those of Sebia.

2.2

COMPLIANCE WITH OCCUPATIONAL HEALTH AND SAFETY REGULATIONS

Ensuring the health and safety of our employees and stakeholders is paramount.

In particular, Sebia takes the necessary measures to ensure that working conditions protect the health of employees and our partners, by providing them with a healthy and safe working environment, with comfortable premises and modern equipment.

Our company attaches great importance to internal health and safety information and training (fire, first-aid workers, road safety, etc.) and implements a number of actions to manage the various risks and eliminate the dangers related to its activity as an industrial manufacturer of in vitro diagnostic medical devices.

It shall also be the responsibility of each employee to take care, according to their training and to the extent possible, of their health and safety and those of other persons affected by their acts or omissions at work, by adopting appropriate behaviour.

Employees must immediately inform Sebia of any dangerous situation, any work situation they have reasonable grounds to believe presents a serious and imminent danger to their life or health, as well as any shortcomings they find in the protection systems.

2.3

WORKING TIME, REMUNERATION AND TRAINING

2.3.1 WORKING TIME

Sebia respects the legal working hours. In terms of the organisation of working time, there is stability in practices, both in terms of working hours and the proportion of part-time employees.

Sebia recalls that employees must comply with the daily and weekly statutory rest periods.

2.3.2 REMUNERATION

Sebia undertakes to comply with all the regulations to which it is subject relating to remuneration and benefits, in particular those relating to the minimum wage or remuneration for overtime.

The annual remuneration review rules reflect Sebia's commitment to offering a fair salary development based on objective criteria such as performance evaluation.

A remuneration policy has been put in place, the principle of which consists in determining a remuneration target by grade and by business line, corresponding to the remuneration of an employee who meets the exact requirements of the position, and then defining a range corresponding to the degree of mastery of the position or performance.

2.3.3 TRAINING

Sebia offers diversified career and development opportunities so that each employee, according to their wishes and changes in the business lines, can grow and develop.

Each year, as part of the annual interview, the employee discusses with their manager their wishes for career development and their personal development plan.



Our HR training and development team adapts training paths to operational needs and strives to make the training offer more accessible and flexible by offering some training courses in an e-learning format.

2.4 EQUITY, INCLUSION AND DIVERSITY

2.4.1 GENDER EQUALITY

Sebia believes in gender equality in the distribution of roles in the company and the place of each gender in all types of positions.

Sebia has put in place a tailor-made action plan on this issue, is constantly improving the corresponding index and reducing any pay gap that may exist for the same level of experience, responsibility or performance.

Our company also wishes to promote professional diversity and thus encourage and develop measures aimed at ensuring respect for equal opportunities between women and men, by empowering each player in the company through the implementation of measures relating to access to training, remuneration and recruitment.

Sebia is thus committed to targets and actions in each of the following five areas:

- Recruitment;
- Promotion and professional development;
- Training;
- Remuneration;
- Work-life balance.

2.4.2 INCLUSION OF PERSONS WITH DISABILITIES AND RESPECT FOR DIVERSITY

Sebia strives to promote equal opportunities, in particular for people with disabilities, as well as diversity.

Sebia has among its staff a Disability officer responsible for raising awareness and training employees about disability and promoting the recruitment, integration and retention in employment of persons with disabilities. The Disability Officer also organises the inclusion of disability situations in the company and supports the definition and implementation of a disability policy.

A Diversity Officer has also been appointed, responsible for promoting diversity, the prevention of discrimination and professional equality. The Diversity Officer implements



awareness-raising actions, practices and procedures promoting inclusion.

Partnerships with specialised recruitment sites/agencies make recruitment advertisements accessible and visible to people with disabilities and support Sebia in raising awareness among its employees. Sebia has also partnered with a company specialised in the field to raise awareness and train employees on various disability topics.

2.5 COMBATING ALL FORMS OF DISCRIMINATION

Sebia ensures compliance with the legal provisions on discrimination in recruitment and unequal treatment.

Sebia does not look at others differently and respects each person's personal lifestyle choices.

No one should be subjected, whether through words, actions or behaviours, to unfavourable treatment because of criteria that are unrelated to professional skills such as age, origin, religion, sexual orientation or health status. No employee may be discriminated against at work in terms of recruitment, training or salary.

It should be noted, however, that differences in treatment are provided for by law, such as schemes in favour of young people such as vocational training contracts, co-funded contracts or schemes reserved for people with disabilities.

Sebia expects its employees who witness or are alerted to alleged discriminatory behaviour to speak to their line manager and/or the Human Resources Department and/or the Work's Council and/or to use our whistleblowing system (see below).

We remind you that such behaviour cannot be accepted at Sebia and may give rise to internal disciplinary measures or even criminal penalties.

2.6

COMBATING ALL FORMS OF HARASSMENT

Sebia ensures compliance with the legal provisions relating to psychological harassment, sexual harassment or sexist behaviour.

Sebia has among its staff a Harassment Officer as well as members of the Work's Council appointed in this capacity. Sebia has informed its employees on the legal definition of the term and who to contact if necessary.

All employees are invited to show respect for their colleagues and business partners.

Behaviours and attitudes that are knowingly aimed at seeking to psychologically injure, offend, destabilise or intimidate an employee into making mistakes are prohibited.

Any form of humiliation and intimidation, as well as the physical and/or social isolation of a particular employee are also prohibited.

Likewise, unwanted or inappropriate physical contact, inappropriate gestures, requests and comments, written or verbal, of a sexual nature are strictly prohibited.

Harassment, both psychological and sexual, can affect both men and women and can occur inside and outside the company's premises.

We expect our employees who witness or are alerted to harassment to speak to the Harassment Officer and/or to use our whistleblowing system (see below).

Sebia considers the practices set out above as unacceptable, the company calls on its employees to be vigilant and undertakes to firmly penalise inappropriate behaviour.

It should be noted that such behaviour may be subject to internal disciplinary measures or even criminal penalties.

2.7

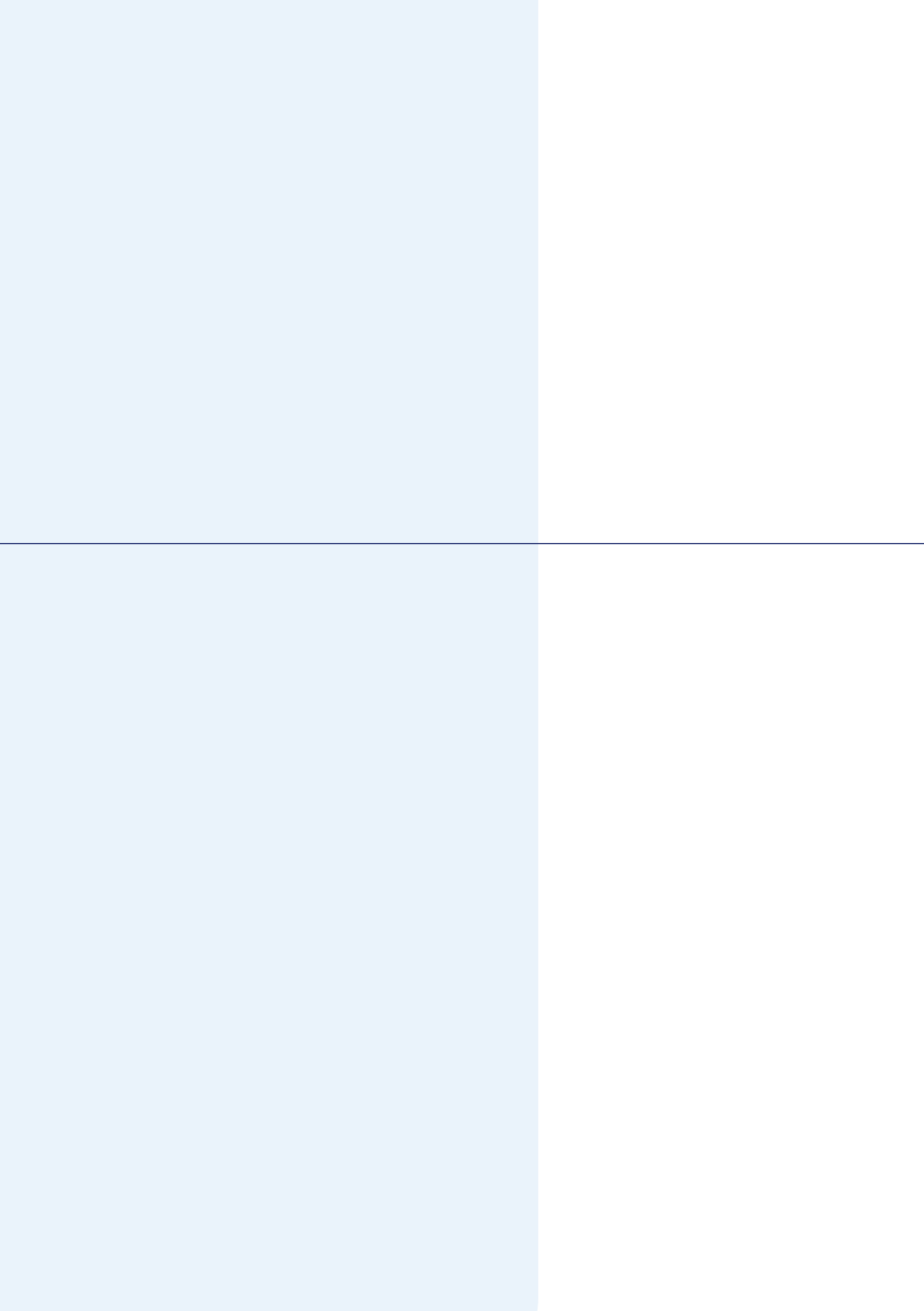
LABOUR RELATIONS



Sebia is committed to listening to the demands of its employees and respects the right to freely and voluntarily form and join groups for the promotion and defence of their occupational interests (ILO Convention No. 87).

Sebia employees benefit from collective agreements, charters and action plans.

Labour relations are conducted at Sebia through staff representatives invited, in accordance with the law, to monthly meetings to discuss their questions, individual or collective complaints, as well as to be informed or consulted by the Management.



BUSINESS
CONDUCT

3

3.1 INFORMATION CONFIDENTIALITY AND DATA PROTECTION

3.1.1 CONFIDENTIALITY

Respect for confidentiality guarantees Sebia's integrity and ensures the maintenance of trusted relationships with its various stakeholders.

Sebia undertakes to respect the confidentiality of information received from employees and stakeholders, and not to divert it from its initial use by appropriating it or making it available to a third party.

Sebia expects the same duty of confidentiality from its employees and partners.

It is therefore essential for each employee and partner to ensure that any information specific to Sebia remains strictly confidential and that any communication mentioning Sebia complies with the Group's External Communication Policy or has the consent of the parties.

The obligations incumbent on employees are set out in their employment contracts and in their relations with partners. They are invited to take all necessary measures to secure the company's sensitive information using, where appropriate, confidentiality agreements with the support of the Legal Department.

3.1.2 PROTECTION OF PERSONAL DATA

Sebia collects and stores certain personal information, both for its operational needs and to meet its legal obligations.

Respecting the privacy and ensuring adequate protection of the data of our employees and external stakeholders is a priority for us.

Sebia complies with the national provisions of each country where it is present as well as with Regulation (EU) 2016/679 of the European

Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC («General Data Protection Regulation» or «GDPR») of 25 May 2018.

Personal data may only be collected for legitimate purposes. It may only be used for the purposes for which it was originally collected and must not be kept beyond the time allowed by law.

Sebia has a personal data protection policy in place and training is provided annually to our employees.

Finally, Sebia has appointed a Data Protection Officer (DPO) to support Sebia in its efforts to protect personal data. The DPO can be contacted for any queries, questions or complaints at: dpo@Sebia.com

3.2 RESPECT OF INDUSTRIAL AND INTELLECTUAL PROPERTY RIGHTS

Sebia allocates significant financial and human resources to innovation and the creation of products that represent a high-value asset in order to maintain its position in the sector.

All documents or information relating to these innovations and creations are subject to intellectual, industrial and artistic property or know-how which is Sebia's strength.

Each of Sebia's employees must be committed to protecting them.

In addition, Sebia also respects the intellectual or industrial property rights and the know-how of its partners.

3.3

TRANSPARENCY AND BENEFITS FOR HEALTHCARE PROFESSIONALS

As a company manufacturing and marketing in vitro diagnostic medical devices, Sebia is subject to the regulations governing benefits granted to healthcare professionals (LEA).

Employees having a role in this matter are regularly trained internally on the rules relating to the granting of benefits to healthcare professionals and the amounts of the agreements entered into are declared biannually in full transparency as required by law.

The rules relating to gifts and benefits for healthcare professionals are also set out in the anti-corruption code of conduct (see below) accessible on our website www.Sebia.com.



3.4 ANTI-CORRUPTION, INFLUENCE PEDDLING, CONFLICTS OF INTEREST, GIFTS & INVITATIONS

Sebia has set up an anti-corruption program, built on the recommendations of the French Anti-Corruption Agency, including:

- A code of conduct, intended for employees of the group but also external partners.

The code sheds light on ethical practices in line with Sebia's values and the regulations in force with regard to:

1. Corruption
2. Influence peddling
3. Conflicts of interest
4. Gifts, benefits and invitations
5. Patronage and donations
6. Sponsoring
7. Relationships with health professionals

The code is available on our website www.Sebia.com.

- A training programme for all employees of the group. This raises awareness and equips everyone to deal with the risk of corruption.
- A procedure for assessing third parties in order to identify and assess corruption risks that may arise when entering into relationships with new partners.
- A whistleblowing system intended to collect reports relating to the existence of conduct or situations contrary to the code of conduct (see below).

Lastly, a corruption risk map is periodically drawn up, under the guidance of the Group Legal Director. This risk map is used to implement the resources for preventing and detecting corruption. It allows the implementation of concrete action plans to reduce the risk of corruption.

3.5 COMBATING FRAUD & DUTY OF VIGILANCE

Fraud is defined as any act or omission committed intentionally by one or more persons, natural or legal, in order to obtain an illegitimate, illicit or illegal advantage or benefit (e.g. misappropriation of goods and services; breach of trust; identity theft, etc.).

Sebia wishes to combat both internal and external fraud.

In case of suspicion, employees are invited to inform their line manager and the Group Legal Director as soon as possible.

The whistleblowing system (see below) can also be used to report any suspicion of fraud found by an employee or an external stakeholder.

Sebia is also prohibited from using undeclared workers in any way whatsoever, and undertakes to provide, at the request of its partners, a certificate of social security declarations and payment of social security contributions.

It expects the same diligence from its partners, which it subjects to a verification procedure as part of its duty of care.

3.6 ANTI-COMPETITIVE PRACTICES

Transparency, integrity and respect for fair competition are core values and essential pillars of Sebia's longevity and sustainable growth.

Sebia prohibits anti-competitive practices, whether they involve the exchange of inappropriate information or unlawful agreements with competitors, abuse of a dominant position or any behaviour likely to have an impact on competition.

Training on high-risk behaviours and best practices is provided to employees and is an essential step in raising

awareness among our internal stakeholders.

We recall that the violation of competition law puts the company and the persons who took part in it at risk of civil and criminal penalties.

3.7 PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

Money laundering is the use of the economic and financial system to transform income from illegal activities into licit resources.

Terrorist financing is the provision or collection of funds that may be used to commit a terrorist act or to finance an organisation.

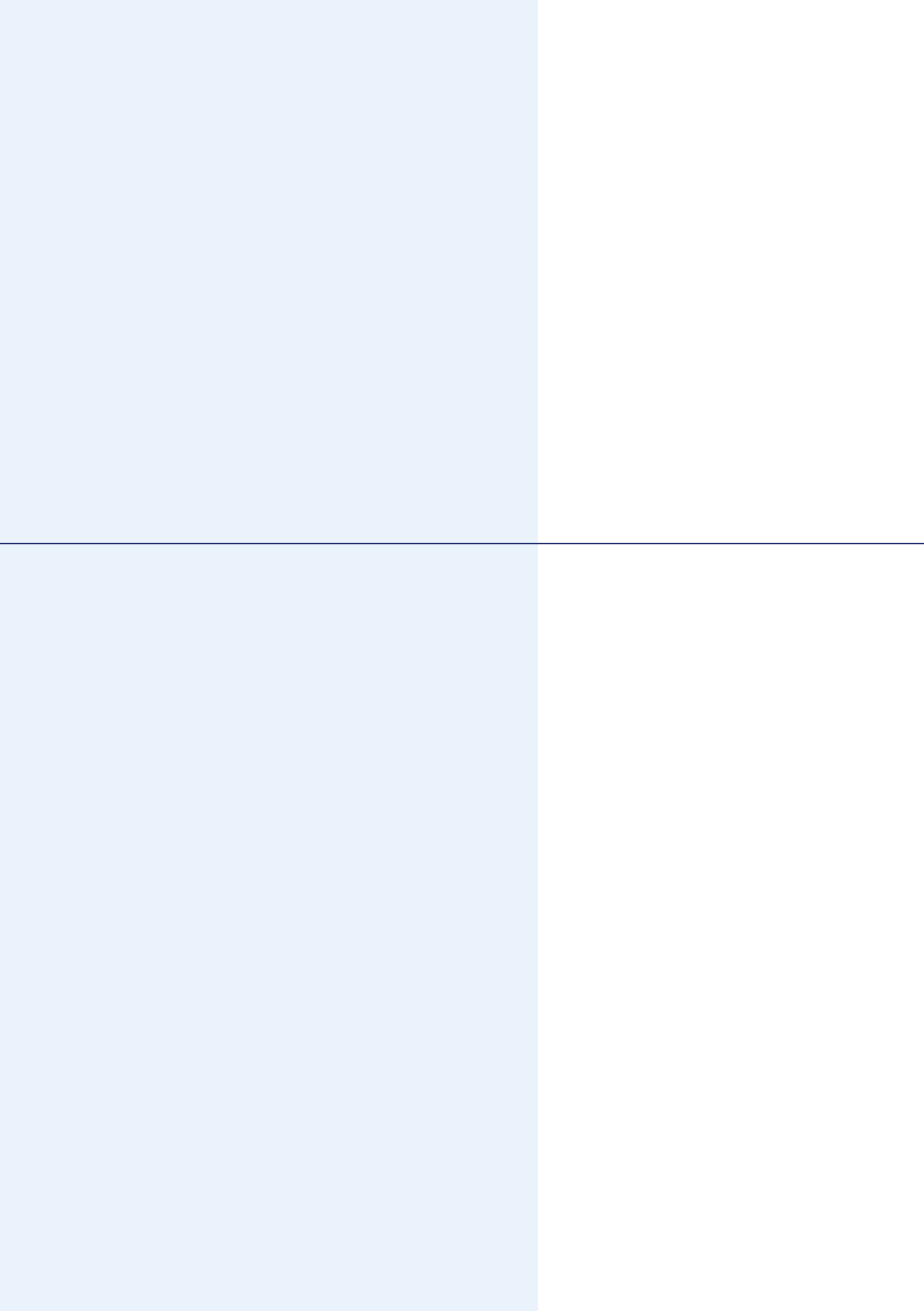
Sebia works to prevent money laundering and terrorist financing and only accepts, in return for its goods and services, acceptable and legal forms of payment.

3.8 RESPONSIBLE PROCUREMENT MANAGEMENT

Sebia ensures that its subcontractors and suppliers are committed to an ethical approach and requires them to respect the principles of this Code.

Sebia requires its suppliers and subcontractors to strictly comply with all legislative provisions relating to their activities and their professional environment.

Consequently, the choices of Sebia employees in terms of purchasing and partnerships must take into consideration the ethical behaviour of the co-contractors by carrying out an assessment of their integrity.





**IMPLEMENTATION
OF THE CODE**

*OF BUSINESS
CONDUCT AND
ETHICS*

4.1 GOVERNANCE

As topics related to business conduct and ethics are often complex, the implementation of the Code is supervised by the Group Legal Director, whose task is threefold:

1. Prevention through the Code and the various training provided to employees;
2. Consulting when an employee needs help to adopt the right behaviour in a situation that is likely to be contrary to the Code;
3. Investigation when an internal investigation is implemented after an alert is triggered.

4.2 DISTRIBUTION

A copy of the Code is sent electronically to each new Sebia employee and they can refer to it on the intranet throughout their career at the company.

It is also available to all stakeholders on the group's website: www.Sebia.com and is referred to in all contractual documents so that external stakeholders are aware of it and adhere to it.

4.3 THE WHISTLEBLOWING PROCEDURE

Sebia has set up a whistleblowing procedure to allow any employee or external stakeholder to report a situation that does not comply with the principles set out in this Code or contravenes the laws in force: www.ethicorp.com/Sebia.

The alert procedure is available in all languages of the group and guarantees the strict confidentiality of the reported facts, as well as of the personal data of the person making the report and of the person(s) implicated or mentioned in the alert.

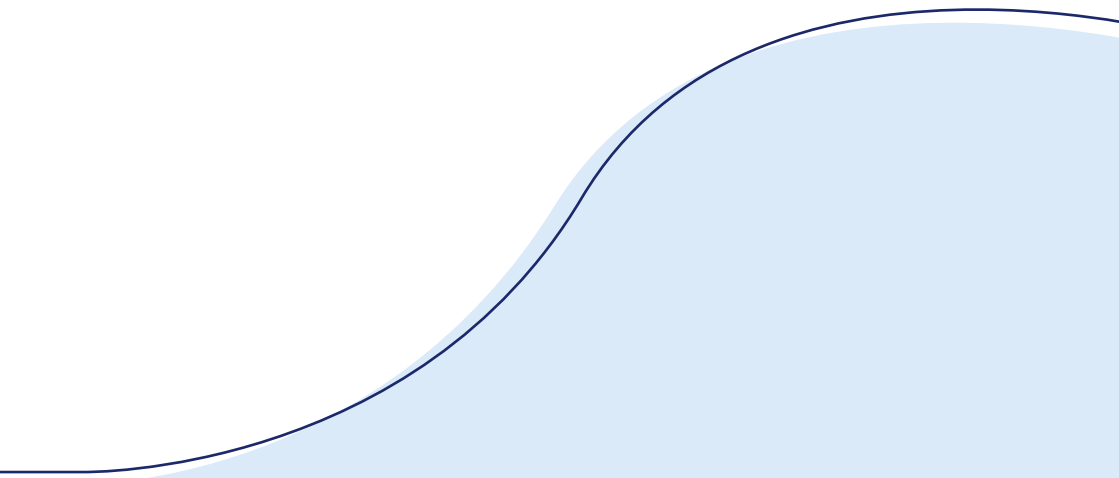
The use of this system is optional and employees can still refer the matter to their line manager or the Group Legal Director.

4.4 CONSEQUENCES OF NON-COMPLIANCE WITH THE CODE

Sebia relies on the vigilance and professionalism of everyone to ensure the application of this Code.

Any proven case of conduct contrary to this Code will be penalised by appropriate disciplinary measures, up to and including dismissal.

In the event of a violation of laws or regulations, those responsible, the perpetrators or accomplices, whether natural or legal persons, will be subject to legal proceedings and the penalties (civil or criminal) handed down by the competent authorities.



sebia 
The new language of life