

# SYMATESE ANTI-CORRUPTION POLICY

POLICY AND  
GOOD PRACTICES  
RELATING TO  
THE FIGHT AGAINST  
CORRUPTION.





## **ANTI-CORRUPTION POLICY** BY OUR GENERAL MANAGER JEAN-PAUL GÉRARDIN

### **ISSUES**

The SYMATESE Group attaches great importance to **transparency and ethics** in the relations between all the players who work on its business project.

The **French law** of December 9, 2016 requires companies to fight corruption and influence peddling, which leads us to implement a self-protection system at the level of all our subsidiaries.

We see this requirement as an opportunity to describe **the ethics expected of everyone in their business dealings.**

In this way, we want everyone, in the performance of their duties, to preserve **the integrity and good reputation of the group.**



## OUR ANTI-CORRUPTION POLICY

### IN THE FIGHT AGAINST CORRUPTION

- Respect and ensure that all Group employees respect this Policy on the **fight against corruption** in France and abroad;
- Ensure that our partners, customers, service providers, intermediaries and suppliers comply with our requirements.

### POLICY GUIDELINES

- Identify and assess **corruption risks**;
- Define and enforce the **attitudes expected** to avoid corruption;
- **To train and inform** employees and partners of the group's policy on the fight against corruption;
- **To allow employees and partners to alert us** to any conduct or situation that is contrary to our policy;
- **Establish procedures for evaluating** customers, first-tier suppliers and intermediaries;
- Regularly **evaluate the effectiveness** of the anti-corruption prevention system.



# GOOD PRACTICES IN THE FIGHT AGAINST CORRUPTION

## SCOPE OF THE ANTI-CORRUPTION POLICY

The SYMATESE Group's anti-corruption policy applies to all employees, as well as to external and occasional partners, in France and abroad.

It is part of all relationships with customers, suppliers and, more generally, all the group's partners.

It is applicable wherever the SYMATESE Group operates through a subsidiary or otherwise. In any case, local laws that are stricter than the SYMATESE Policy must be respected.

## GENERAL RULE

In general, active corruption (bribing) consists of attempting to influence or influence the action or decision of a private or public person by means of a gift or the promise of a gift (gift, money, meal, trip, service, sponsorship, etc.), in particular with the aim of obtaining special favors or advantages.

Passive bribery (being bribed) is accepting a promise or gift, or receiving a gift in return for an influence, action or decision.

Influence peddling refers to the fact that a person monetizes his or her position or authority, real or assumed, to influence a decision that will be made

by a third party. It involves three actors: the beneficiary (the one who provides advantages or gifts), the intermediary (the one who uses the credit he or she has because of his or her position) and the target person who has the power of decision (authority or public official, magistrate, expert...).

Active or passive corruption and influence peddling engage the personal responsibility of the employee and expose him or her to disciplinary sanctions imposed by the company, but also to criminal sanctions (fines and imprisonment) according to the applicable legislation.





The company may also be heavily sanctioned with fines or a ban on doing business.

**Expected attitude:**

One should be very careful about these practices and ask the following questions:

- Are the laws and regulations respected?
- Is this in line with the SYMATESE Policy and the interests of the group?
- Is it devoid of personal interest?
- Would I be embarrassed if my decision was made public?
- Have I acted transparently?

If an employee has any questions, misunderstandings or doubts about a situation or practice that may be considered corrupt, he or she should immediately seek advice from his or her supervisor and/or internal audit on what to do.



## SPECIFIC RULES

Gifts, courtesy signs, hospitality invitations and entertainment:

### Definitions:

Gifts are benefits given by someone as a sign of appreciation or friendship, without expecting anything in return.

Hospitality invitations usually include the cost of refreshments, meals, travel or lodging.

Entertainment includes attending shows, concerts and sporting events.

- They must not be subject to any consideration;
- In times of tender or contract renegotiation, they must be systematically refused;
- They must be made in full transparency with his hierarchy.

### Expected attitude:

Particular care should be taken with gifts, courtesies, invitations and hospitality, and entertainment, whether received or given, because although they can be a means of fostering good relations, they can also be a means of influencing a decision, of favoring a company or a person.

The following rules should be observed for gifts received:

- They must remain rare and not become a habit;
- Amounts must be reasonable;
- They must be shared with other non-decision makers;
- They should never be financial in nature: loans, cash or cash equivalents (e.g. vouchers);

### For donated gifts:

- They must remain rare and not become a habit;
- The amounts must be reasonable in relation to the context of the country where the gift is offered (e.g. box of chocolates, flowers);
- They should never be financial in nature: loans, cash or cash equivalents (e.g. vouchers);
- They must not be subject to any consideration;
- They are not allowed during a tender or contract renegotiation period;
- They must be made in full transparency with his hierarchy;
- They must be traceable in the company's accounts.



## RELATIONSHIP WITH HEALTH PROFESSIONALS

Since October 1, 2020, the implementation of a new decree has reinforced the so-called «anti-gift» law (Order No. 2017-49 of January 19, 2017), a law that aims to prohibit the provision of any cash or in-kind benefit to a healthcare professional except in a few exceptional cases.

The exceptions requiring declaration or authorization to the competent College are :

- Collaboration agreements for research activities, the valorization of research work, scientific evaluations, consulting missions, services or commercial promotion.
- Payment of hospitality expenses for participation in professional, scientific or promotional events.
- The financing of professional training or CPD (Continuing Professional Development).
- Donations to fund research.

**Please note** that amounts under 2000 euros for a convention as a whole require a declaration to the competent order. On the other hand, above this amount, a request for prior authorization is necessary for a convention as a whole with a limit of 150€ night for lodging expenses, 50€ meal and 15€ snack. In the case of an «impromptu» meal the maximum amount of the meal is limited to 30 euros per person (drinks included).

In accordance with the Public Health Code, companies producing or marketing health or cosmetic products must **make public** on the **Transparency Health database** the **agreements, remunerations** and **benefits** granted to the various actors involved in the health field, in particular to health professionals.

The information contained in the public Transparency - Health database is the responsibility of the companies. The declarations are updated twice a year and remain accessible to the public for a period of five years from the date they are put online.

For each type of report, at a minimum, the following information is published:

- **For agreements:** identity of the parties involved, date of signature of the agreement, start date and amount provided for in the agreement.
- **For remuneration:** identity of the parties, date of payment, amount if greater than or equal to 10 euros.
- **For direct or indirect benefits in kind and in cash:** identity of the parties involved, amount, nature and date of each benefit when the amount of each benefit is greater than or equal to 10 euros including tax.



## RELATIONS WITH PUBLIC OFFICIALS

### Definitions:

The term «public official» means:  
Any elected or appointed official, representative or employee of a government or ministry, a government agency, a public international organization or a company owned, even partially, by a government (ministers, members of parliament, elected officials, judges, civil servants including doctors in public hospitals, drug agency...), as well as politicians and candidates for public office.

### Expected attitude:

Any relationship with a public official must comply with the regulations. It is strictly forbidden to give any advantage to a public official.

In all cases, SYMATESE employees must:

- Act honestly and transparently, informing their supervisor beforehand;
- Never offer anything to a public official,
- Not to make facilitation payments, i.e. unofficial payments (as opposed to official duties and taxes) made to facilitate or accelerate any formalities, particularly administrative formalities such as applications for marketing authorizations for our products, customs clearance, permits, visas, etc., except in cases of force majeure upon the decision of the Group's General Management,
- Go to interviews with public officials in pairs (minimum).





## DONATIONS TO CHARITABLE OR POLITICAL ORGANIZATIONS OR ASSOCIATIONS

### Definitions:

Gifts and donations to organizations or associations, parties or political leaders are benefits given in the form of money and/or contributions in kind. They are allocated for a specific purpose: research, education, environment, charitable, humanitarian and political purposes.

Political contributions - monetary or otherwise - are intended to support political parties, officials or initiatives. These are strictly prohibited. The political involvement of SYMATESE employees must be in the private sphere only.

### Expected Attitudes:

In all cases, SYMATESE employees must:

- Obtain prior authorization from the group's General Management if the donation is made on behalf of SYMATESE,
- Donations must be tracked in the company's accounts and be subject to a contract that specifies the purpose of the donation and its expected use,
- The donation must be for charitable purposes only and must not give rise to any consideration,
- Donations to political parties or officials from SYMATESE resources are not permitted. Employees must use their own financial resources and assets exclusively for their own political involvement. They must take care not to damage SYMATESE's reputation and be vigilant as to the perception that any third party might have of your political actions.



## PATRONAGE, SPONSORSHIP

### Definition:

Through patronage or sponsorship, the company wishes to provide financial or material support to a work, a social, cultural or sports action in order to communicate and promote its values.

### Expected attitude:

In all cases, SYMATESE employees must:

- Obtain prior authorization from the Group's General Management,
- Do not seek direct benefits from the recipient (other than promoting the company's image),
- The actions of patronage or sponsoring must be traceable in the accounts of the company or at the level of the endowment fund.

## CONFLICTS OF INTEREST

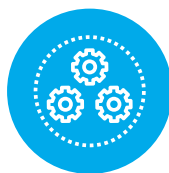
### Definition:

Conflicts of interest arise from any situation in which the personal activities or interests of employees conflict with their professional duties or responsibilities.

### Expected attitude:

If circumstances arise that give rise to a potential or actual conflict of interest, employees must:

- Be transparent and report to their supervisor;
- Ensure that the decision is not influenced or determined by an interest other than the company's interest.



# IMPLEMENTATION

## TRAINING - INFORMATION

Employees are required to read the SYMATESE Policy on the fight against corruption and to participate in the

training and awareness sessions that will be organized.

## REPORTING NON-COMPLIANT PRACTICES

Any employee who reports in good faith and in a disinterested manner on a potential violation of the SYMATESE Anti-Corruption Policy will be protected from any form of retaliation.

Each employee must share his or her doubts and/or ask questions:

- If confronted with a potential case of corruption;
- If it believes in good faith that a violation of the SYMATESE Policy and/or regulations has been, is being, or will be committed;
- If they discover that someone is being retaliated against for raising an issue in good faith.

An honest mistake will not result in disciplinary action. On the other hand, abusive or malicious disclosures may be subject to disciplinary or even criminal sanctions.



## WHISTLEBLOWING AND PERSONAL DATA PROTECTION

In accordance with the regulations applicable to data protection in most of the countries in which the company operates, and in particular within the European Union, any person identified in the context of an ethical alert procedure, whether he or she is the sender of the alert or the subject of the alert, may exercise his or her right of

access to data concerning him or her by using the procedure defined by the company.

Everyone can also request the correction or deletion of data if they are inaccurate, incomplete, ambiguous or outdated in the same way.

## COMMITMENTS OF THE SYMATESE GROUP

The group is fully committed to :

- Take all statements seriously;
  - Evaluate the facts objectively and impartially;
  - Take appropriate corrective action and disciplinary action, up to and including termination of employment.
- The various cases and examples cited in the SYMATESE Policy on the fight

against corruption are not exhaustive. Indeed, the group will sanction any case of proven corruption, even if it has not been described in the Policy.

Similarly, any corruption of which the Group becomes aware outside the reporting procedure described above will be sanctioned.





SYMATEse

