

Partners Code of Conduct

This Partners Code of Conduct outlines the ethical, environmental, and business principles that Partners are expected to adhere when engaging in business activities with EXOSENS. By Partners, we mean customers suppliers, sub-contractors, distributors, agents, shareholders, or any other company with which any Exosens Group company contracts.

Playing a strategic role in our success, Partners must commit to these principles and contribute to the creation of a sustainable, responsible, and mutually beneficial business relationship.

The purpose of this Code of Conduct is to provide Exosens with a sustainable global competitive advantage focused on value creation, innovation, business partnerships and operational excellence.

1 Legal compliance

Partners must conduct their business with integrity, honesty and transparency, and thus comply with all applicable laws, regulations and industry standards in the countries where they operate. This includes, but is not limited to, labor, human rights, environmental protection, trade sanctions and anti-corruption laws such as fair and ethical treatment of employees, customers and other stakeholders, and compliance with foreign and domestic laws and regulations dealing with corruption and influence peddling in all circumstances.

When applicable, Partners must comply with applicable laws and regulations relating to the supply of conflict minerals. In order to support the request of our customers, Exosens is carrying out due diligence within its supply chain to ensure that tantalum, tin, tungsten and gold, that may be purchased have not originated in the identified high-risk areas by requesting a completed "Conflicting Minerals Template Form" from our applicable suppliers. A blank form will be sent to each relevant supplier.

When applicable, Partners must ensure that their business practices comply with applicable national laws, directives and regulations governing the importation and exportation of parts, components and technical data applicable in the Partner's country.

2 Corruption and bribery

In alignment with our steadfast commitment to integrity and ethical business practices, business Partners are expressly prohibited from engaging in any form of corruption and bribery.

This encompasses the solicitation, acceptance, or offering of gifts, promises, or advantages to individuals, whether directly or through intermediaries, with the intention of gaining undue influence or personal gain.

As explained in the chapter "Legal Compliance," this includes strict adherence to specific legislation such as the French law no. 2016-1691 of 9 December 2016, known as the "Sapin II law," the American law on corrupt practices abroad ("FCPA"), the UK Corruption Act 2010 ("UKBA"), and any other relevant anti-corruption and influence peddling laws and regulations. All interactions, including the exchange of gifts, must comply with applicable laws, organizational rules, and market practices, promoting transparency and ethical conduct.

2.1 Conflict of interests

Partners must actively contribute to the cultivation of ethical business practices by implementing policies designed to prevent any conflicts of interests or situations that may potentially lead to such conflicts. This

necessitates the establishment of policies that empower employees facing real or potential conflicts of interests to report them to their immediate superiors.

Within the framework of this Code, conflicts of interests encompass situations where there is a divergence between the professional activities of employees of Partners and their personal interests or those of their close relatives, friends, or associates.

It is incumbent upon Partners to furnish appropriate training to employees who may be exposed to the risk of conflicts of interests. Adherence to these principles ensures transparency and ethical conduct in all their business interactions.

2.2 Fraud

In the fight against fraud, Partners must stick to ethical behavior and avoid deceptive practices. This includes not seeking advantages through tricks, false claims, or any misuse of information or property. Partners, working with suppliers, should steer clear of deceptive actions that could harm the company, customers, or third parties. By sticking to these principles, we maintain the integrity of our operations and create an environment where trust and ethical behavior thrive.

3 Fair competition

Partners must strictly adhere to laws and regulations promoting fair competition and prohibiting anti-competitive practices. In upholding the principle of price freedom, Partners are obligated not to engage in agreements with competitors regarding pricing or bid manipulation. Market-sharing agreements with competitors are strictly forbidden. Furthermore, Partners must refrain from sharing sensitive competitive information, be it current, recent, or forecasted, including but not limited to pricing details. It is imperative that Partners abstain from participating in any cartel activities.

Partners in positions of dominance must exercise caution, avoiding the establishment of commercial terms deemed excessive, discriminatory, or constituting an abusive loyalty system that could be construed as an abuse of dominant position. Ensuring access to essential technologies and infrastructure is crucial for fostering fair competition. Upholding these principles is not only a legal obligation but also essential for promoting a transparent and competitive business environment. Partners must prioritize compliance with these guidelines to contribute to a marketplace that values fair competition and ethical business practices.

4 Labor Practices and Human Rights

Partners must defend fundamental labor rights, including the prohibition of child labor, forced labor, corporal punishment, harassment and discrimination. All employees must be treated with dignity and respect, with a minimum living wage and maximum working hours, safe and hygienic working conditions, in accordance with applicable laws and regulations.

5 Environment, Health and Safety

Partners are encouraged to implement an appropriate Environment, Health and Safety Management System (such as ISO 14001, ISO 45001, ISO 50001, etc.) and to promote it internally and externally. Also, as stipulated in the "Legal compliance" chapter of this Code of conduct, Partners are required to ensure that all their operations, including those conducted by their own supply chain, comply with all applicable environmental, health and safety laws and regulations.

5.1 Environmental responsibility

Partners are encouraged to minimize their environmental impact by adopting sustainable practices, reducing waste, and managing resources responsibly. Compliance with environmental laws and regulations is mandatory, and Partners are expected to work towards continuous improvement in their environmental performance.

They shall take appropriate measures to operate in such a way as to:

- Limit the environmental impact of their operations, particularly by reducing energy consumption and waste generation and improving the prevention and control of all other potential forms of pollution;
- Actively manage, prevent and reduce environmental and health and safety risks (to avoid, as far as possible, the use of (and exposure to) hazardous materials, limit risks related to storage conditions, manage potential reuse, recycling, transporting or disposing of waste, reducing radiation exposure, etc.);
- Preserve natural resources, promote the recovery and recycling of materials;
- Protect the environment in the territories where they operate and throughout their impact zone;
- Ensure that their goods, works or services do not have a negative/harmful impact on biodiversity;
- Develop a positive contribution to fight climate change; and more generally implement all protective measures to prevent a potential risk of harm to human or animal health and the environment.

5.2 Health and safety

Partners must prioritize the health and safety of their employees and stakeholders. Adequate measures should be in place to prevent accidents, injuries, and occupational health hazards. Safety protocols and training programs should be implemented to ensure a safe working environment.

They have to protect the health, safety and well-being of their employees, temporary employees, visitors, suppliers and any other persons who may be affected by their activities.

6 Confidentiality and Intellectual Property

Partners must respect and protect the confidentiality of Exosens' information and intellectual property. Any information shared during the course of the business relationship should be treated with the utmost confidentiality.

Partners along with their subcontractors and service providers, are mandated to uphold data protection standards. This includes compliance with the European Regulation No. 2016/679, commonly known as the General Data Protection Regulation (GDPR), and all laws, regulations, and international, federal, state, and provincial requirements pertaining to data protection. Partners must ensure the safeguarding of sensitive information, complying with applicable data privacy laws governing the collection, processing, and transfer of personal data.

Partners are expected to utilize sensitive information strictly for its intended business purpose, refraining from unauthorized use such as advertisement or publicity, unless prior authorization is obtained. The protection of sensitive, confidential, and proprietary information, including personal data, is paramount. Partners must implement adequate physical and electronic security measures to prevent unauthorized access, destruction, modification, and disclosure. In case of any suspected or actual data breach or security incident impacting the business relationship with Exosens, Partners must promptly report it to Exosens for immediate attention. Adherence to these directives is essential to maintain a robust and secure data protection framework.

7 Reporting and Compliance

Partners are expected to promptly report any violations of this Code of Conduct to Exosens on the whistleblowing platform publicly accessible on the website. Exosens reserves the right to conduct audits and assessments to ensure compliance with this Code of Conduct.

8 Continuous Improvement

Partners are encouraged to engage in continuous improvement efforts related to ethical, social, and environmental responsibility. Exosens is committed to working collaboratively with Partners to foster a culture of sustainability and responsibility.

By entering into a business relationship with Exosens, Partners acknowledge their commitment to this Partners Code of Conduct and agree to uphold the principles outlined herein. Failure to comply with this Code may result in the termination of the business relationship.

Exosens reserves the right to update and amend this Partners Code of Conduct as necessary. Partners will be notified of any changes, and their continued cooperation is expected.

Approved by Jérôme Cerisier, CEO Exosens Group

