

# EMPLOYEE CODE OF CONDUCT

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MOVING **SCIENCE** FORWARD





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## Message from GeoPost's Chief Executive Officer

Ethics is a key element of GeoPost/DPDgroup sustainable strategy and is fully part of our DNA.

At GeoPost/DPDgroup, we firmly believe that respecting people and the environment, conducting our business with integrity, and protecting our resources are paramount to our successful short- and long-term sustainable business development.

It is of the utmost importance to us to continue operating ethically to reach our international growth objectives and become a leader in sustainable delivery and e-services.

To achieve these objectives, there was a need to reinforce our Code of Conduct in line with the update of our Governance rules.

The previous version of the Geopost Code of Conduct was issued back in 2017. The new Geopost Code of Conduct is updated to reflect the best market practices and international standards.

In line with our Federator Model, this Code was elaborated in a collaborative manner with our Business Units.

This new Geopost Code of Conduct applies to all employees of GeoPost Business Units. In practical terms, it provides all our employees with tools to help identify the right and wrong things to do.

We thank each CEO for ensuring that all employees of their Business Unit:

- carefully read, understand and apply the principles set out in the new GeoPost Code of Conduct.
- use good judgment and common sense in any situation that may arise.

The adherence to and implementation of the new Code of Conduct by each of our Business Units will contribute to our sustainable development ambition.



## Message from Biocair's Chief Executive Officer

As a global GDP logistics specialist with over 35 years' experience in the pharmaceutical, biotechnology and life sciences sectors, Biocair has built a unique, client-centric approach assembling a team of best-in-class industry experts in quality, cold chain and regulatory compliance.

To maintain the trust and confidence of our customers, and to make the business even more successful, it is vital that we conduct our business with high standards of ethics and integrity. This doesn't mean just complying with both the spirit and the letter of the various laws and regulations that govern us. It also means leading by example in the way that we do business and in the way that we behave towards colleagues, customers, suppliers, and business partners.

This Code of Conduct sets out the standards of behavior by which all of us are bound. I expect everyone at Biocair to follow the Code, to advocate for others to do the same, and to feel empowered to speak up if you have questions or believe the Code is not being upheld.

Of course, the Code of Conduct cannot detail the specific behavior required in every situation, and so, the Code should be applied in conjunction with the various policies and standards we have in Biocair, as well as the employee handbook relevant to the country where you work. The Code serves as the code by which we can all judge what is right and proper. Not following the Code of Conduct may result in breaches of law and regulations and a loss of reputation for Biocair. For individuals it could also mean disciplinary action or dismissal. It is, therefore, essential you familiarize yourself with the Code of Conduct, and make following it a daily habit.

If you have any queries or concerns about what the Code of Conduct means or how you should behave in any situation, it is important that you seek guidance from your manager or email the Biocair Ethics Officer at [ethicsoffice@biocair.com](mailto:ethicsoffice@biocair.com).

I am relying on everyone in Biocair to play their part in ensuring that our business continues Moving Science Forward in an ethical, responsible and sustainable way, and remains a business we can all be proud to work in.



Vincent Howard, CEO Biocair

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# 1. Our Code of Conduct

## 1.1 What defines us as Biocair?

### Compliance with laws and regulations

We respect and comply with all applicable laws and regulations. We expect the same commitment from our Business Partners. In addition to complying with the various ethical standards set out in this Code of Conduct, we are committed to complying with all the regulations in force in the territories where we operate, especially the regulations that apply to our business, such as transport rules or customs requirements, which may affect the products we deliver. We comply with the highest level of applicable standards in relation to all these areas. To the extent that they do not violate applicable laws and regulations, we are committed to respecting customary practices and traditions of the countries in which we operate. When there is a conflict between applicable standards, we apply the strictest standard, unless it is considered illegal under local law.

### Serving our customers

We offer proven methods and excellent responsiveness to support the development of our customers. Close working relationships developed by our teams allow for greater flexibility and responsiveness, which are essential to the satisfaction of our customers.

### Respect for human rights

Every human being has general, inalienable and indivisible rights, without distinction of any kind, regardless of location, gender, religion, nationality, ethnic origin, or any other status.

As a signatory of the United Nations Global Compact<sup>1</sup>, through GeoPost, since 2016, and through our sustainable development strategy, Driving Change, we actively work to respect the 10 principles of the Global Compact relating to human rights, international labour standards, the environment and combating corruption.

We also apply, under all circumstances, the international labour and human rights principles as defined by the International Bill of Human Rights, the OECD Guidelines, the International Labour Organization Conventions, the United Nations Guiding Principles and the United Nations' Sustainable Development Goals.

### Working together

When our Employees succeed in bridging borders around the world, it is because they are open-minded and work without barriers. At Biocair, we value teamwork and encourage it by all appropriate means.

As such, all the principles outlined in this Code of Conduct should govern relationships between our team members just as they should guide how we conduct business.

We expect our Employees and Business Partners to treat each other with the respect and consideration they deserve.



<sup>1</sup> <https://www.unglobalcompact.org/what-is-gc/mission/principles>



## 1.2 How to read this Code of Conduct

All words identified with an initial capital letter have the meaning indicated in the Glossary presented in Annex 1.

## 1.3 Who is covered by this Code of Conduct?

All Biocair Employees are required to read and respect the rules stated in the Code of Conduct. Biocair Managers or Executives are required to enforce the rules in the Code of Conduct by demonstrating:

### **Tone at the Top**

Set an example of ethics and integrity every day through words and actions.

### **Promotion**

Ensure that team members are aware of and understand the Code of Conduct and channels to report an alert (including the Whistleblowing)

### **Encourage**

Encourage employees to behave with integrity and praise them when they do so.

### **Trust**

Maintain a climate of trust and careful listening among teams to encourage them to share their difficulties, ask questions and report any violations of the Code of Conduct.

### **Vigilance**

Be alert to any situations that may constitute a violation of the Code of Conduct so that it can be appropriately addressed as soon as possible.

Biocair's expectations relating to our Business Partners are presented in the Biocair Supplier Code of Conduct.

## 1.4 How to apply this Code of Conduct

### A. Use your judgement

Because ethical situations are endless, they cannot be covered exhaustively and precisely in the Code of Conduct.

Anyone confronted with a situation that raises an ethical dilemma shall use their best judgment if they cannot find the answer in this Code of Conduct. This involves asking the following questions:

- Does the action or decision I am about to take comply with the law?
- Does the action or decision I am about to take comply with Biocair policies and procedures?
- Could the action or decision I am about to take have a negative impact on Biocair?
- Would I place myself or Biocair in an uncomfortable position if the action or decision I am about to take were to be revealed internally or in the media?
- Would the action or decision I am about to take put me in a position where I owe something to a Biocair Business Partner?

### B. Ask for advice

If you still have questions, ask the right people for advice:

- Your Manager
- The Ethics Officer
- The People Team
- The Legal or Compliance Departments

### C. Report

All our Employees and external stakeholders can report any behavior that they suspect to be in breach of applicable laws, regulations, and/or provisions of this Code of Conduct.

#### How do I report something?

To allow you to voice your concerns in a way that is the most convenient, several channels are available. You can therefore:

**Speak directly** to a manager, and/or to the Biocair Ethics Officer or any person with whom you are in contact within Biocair.



**Use the Biocair Whistleblowing System** if you suspect any violation of applicable laws or regulations or the Code of Conduct.

[www.safecall.co.uk/clients/biocair](http://www.safecall.co.uk/clients/biocair)





### What guarantees?

- No Employees shall be disciplined for making a report if they have acted, in good faith, without financial compensation, and without intent to harm GeoPost, Biocair, their colleagues, and/or a third party.
- The identity of the Employees, whistleblowers, the subject of the whistleblowing alert and the information relating to such whistleblowing alerts are confidential and known only to the people dealing with the alert. Where permitted by applicable regulations, whistleblowing alerts may be anonymous.

### 1.5 What are the consequences of violating the Code of Conduct?

In the event of a breach of the Code of Conduct, Biocair may apply disciplinary measures to Employees up to dismissal, as provided by locally applicable legal provisions governing each Biocair location. Employees may be held liable in a court of law.

### 1.6 What are the controls to ensure the implementation of and compliance with the Code of Conduct?

Ethics Officer and the Audit, Internal Control, Risk Management, Security and Quality Department of GeoPost SA reserve the right to check on the implementation of and compliance with the Code of Conduct, particularly during audits.

## 2. Respect for People and the Environment

### 2.1 Promote human rights

#### What is it about?

Human rights are universal, indisputable, indivisible and indissociable rights that all human beings enjoy, without distinction of any kind, wherever they are, including gender, religion, nationality, culture, ethnic origin, or any other status.

These rights include, but are not limited to, respect for international standards for migrant workers, respect for fair, safe and satisfactory working conditions, combating forced labour including slavery, child labour or similar, equal opportunity and non-discrimination, and respect for international labour standards.

All organizations should respect human rights even when public authorities are unable to provide these protections. This means working proactively to ensure that the organization does not contribute, directly or indirectly, to the non-respect of rights, striving to prevent and mitigate risks, promoting human rights, exercising their duty of vigilance and remedying any violations.

#### What is Biocair doing in this area?

At Biocair, we protect the human rights of everyone working in our value chain and transport network, by prohibiting, for ourselves and our Business Partners, any form of illegal labour.

To this end, the duty of care compliance applicable within Biocair sets out measures to continuously (i) identify the adverse impacts arising from its activities and its supply chain; (ii) prevent and mitigate such impacts; and (iii) monitor and assess the controls in place.

#### Examples of the right things to do



- All employees should actively support and promote an inclusive workplace where all colleagues are treated fairly and without discrimination
- All employees should respect the rights of their colleagues, customers, and business partners by recognizing and upholding their dignity and freedom.
- All employees should oppose forced labor, child labor, and unsafe working conditions in their workplace and supply chain.
- All employees should act responsibly in business relationships, ensuring that partners and suppliers also uphold human rights standards, and promoting ethical sourcing, sustainability, and fair working conditions.
- All employees should embrace diversity by supporting policies that promote equal opportunities for all and by contributing to a culture of respect and inclusion.
- All employees should report any violations of human rights, such as unfair treatment, harassment, or exploitation, through the appropriate channels.

## Examples of the wrong things to do



- No employees should engage in discriminatory behavior or tolerate discrimination against colleagues, customers, or business partners.
- No employee should ignore any form of forced labor, slavery, or child labor in the workplace or supply chain, even indirectly through suppliers or partners.
- No employee should take any actions or decisions that compromise workplace safety, such as neglecting health and safety standards or ignoring unsafe practices by others.
- No employee should ignore or fail to report any observed violations of human rights, such as harassment, exploitation, or unfair labor practices, whether these occur within Biocair or in its supply chain.
- No employee should accept the working conditions of Business Partners that are not in line with the legal wage requirements and minimum social benefits of the countries in which we operate.

## 2.2. Ensure health and safety at work

### What is it about?

Our activities, whether office, transportation or delivery, can have an impact on health and safety at work. To ensure a good level of physical, psychological and social well-being for employees, teams should take appropriate measures and implement them effectively. It is about preventing the risks relating to their activity and their negative effects on health, such as, for example, musculoskeletal disorders (MSD), psychosocial risks (PSR), fire risks or road accidents. It is also about monitoring the consequences of the diversification of work methods, through the risks associated with hyper-connection and over-solicitation of Employees which are generated by the multiplication of digital tools in companies (laptops, smartphones, e-mails, internal messaging systems, etc.), and the development of remote working.

### What is Biocair doing in this area?

An active approach allows us to provide a safe and peaceful working environment to attract the best talent and partners, but also to reduce work-related accidents, combat absenteeism, increase the overall performance of our organization and preserve the health and physical integrity of our Employees. It is everyone's responsibility to respect the rules and recommendations implemented in this regard.

Biocair conducts its activities, undertaking all necessary preventive steps to ensure safety and protect the health of its work environment, including by complying with all applicable laws and regulations, by creating a work environment and providing work tools that meet the current standards, by being attentive or by training and informing on health and safety measures. Biocair also attaches the utmost importance to maintaining a work/life balance for its Employees. When it comes to health and safety at work, we all have a role to play, for ourselves and our colleagues.



### Examples of the right things to do



- All employees should know and strictly follow Biocair's health and safety rules, regulations, and policies, including wearing appropriate protective equipment, following safe practices, and reporting unsafe conditions.
- All employees should promptly report any potential hazards, unsafe practices, accidents, or near misses to ensure timely corrective action is taken.
- All employees should keep the workspace clean, tidy, and free of clutter to reduce risks of accidents and to create a safer working environment for everyone.
- All employees should actively participate in health and safety training to stay informed about best practices and how to handle emergencies or workplace risks effectively.
- All employees should be attentive to their mental health and that of their colleagues by promoting a supportive environment, recognizing signs of stress or burnout, and seeking or encouraging others to seek help when needed.
- All managers should ensure that we are caring and attentive to our teams, especially during difficult periods (such as during a health crisis).
- All managers should help sort out what is urgent and what can wait until the next business day to be addressed.

### Examples of the wrong things to do



- No employee should ignore health and safety protocols, such as not wearing appropriate protective equipment or bypassing established safety procedures.
- No employee should ignore or fail to report hazards, unsafe conditions, accidents, or near misses, as this could put others at risk.
- No employee should perform tasks recklessly, misuse equipment, or engage in horseplay that could lead to accidents or injuries. They should never work or come to work under the influence of any substance (alcohol, drugs etc.)
- No employee should ignore signs of stress, burnout, or other mental health issues in themselves or their colleagues.

- No employee should contribute to an unsafe work environment by cluttering shared spaces, ignoring health and safety training, or tolerating unsafe practices from colleagues.
- No manager should dismiss the importance of maintaining a work-life balance and pressure employees to prioritize productivity or deadlines over adhering to health and safety standards.
- No manager should ignore or dismiss safety concerns, hazards, or feedback raised by team members.



For more information on ESG SharePoint

- [BIOCAIR HEALTH & SAFETY STANDARDS](#)

## 2.3. Promote diversity, integrity and fairness

### What is it about?

Each human being is unique in their origins, culture, experiences, ideas, etc. This diversity is an asset for Biocair because it fosters the emergence of new ideas, innovation, the sharing of best practices and skills, and an environment conducive to collaboration. This allows us to meet the challenges of today and tomorrow more effectively, to create a unifying environment and to better serve our customers. It is for this reason that, at Biocair, we place significant emphasis on ensuring that diversity, integrity and fairness permeate all our relationships.

Diversity involves factors such as: age, disability, gender identity, sexual orientation, skin color, marital status, pregnancy status, political opinions, religious beliefs, union activities, ethnic, cultural or national origin, etc.

### What is Biocair doing in this area?

At Biocair, we do not tolerate any discrimination, direct or indirect, individual or collective, based on any of the criteria above. The recruitment, pay, and promotion of our team members depend solely on their qualifications, skills, and professional performance.

Whenever possible, Biocair provides specific accommodations for people with disabilities, to assist them with joining its teams.

In addition, Biocair takes the necessary steps to ensure that its Employees are trained in this area.

### Examples of the right things to do



- All employees should respect and value the unique backgrounds, perspectives, and experiences of their colleagues, fostering an inclusive and supportive work environment.
- All employees should actively challenge and report any discriminatory behavior, unfair treatment, or bias in the workplace, to ensure that everyone is treated equally and respectfully.
- All employees should actively seek input and collaboration from diverse team members, ensuring that everyone's voice is heard and respected in decision-making processes.
- All employees should act with honesty, transparency, and accountability in their interactions, maintaining fairness and ethical behavior in all workplace activities and relationships.
- All managers should create an inclusive work culture where all employees feel valued and respected, regardless of their background, identity, or personal characteristics.

- All managers should ensure that recruitment, promotions, and professional development opportunities are based on merit and qualifications, without any bias or favoritism.
- All managers should model ethical behavior, integrity, and respect for diversity in their own actions. They set the standard for the entire team.
- All managers should ensure that all employees have access to equal opportunities for growth, development, and advancement. Neglecting to promote fairness in career opportunities can hinder employee morale and overall organizational success.

### Examples of the wrong things to do



- No employee should engage in or tolerate any form of discriminatory behavior, such as making biased comments or excluding colleagues based on race, gender, age, or other personal characteristics.
- No employee should dismiss or undermine the opinions, ideas, or perspectives of colleagues.
- No employee should remain silent when witnessing discrimination, harassment, or unfair treatment in the workplace.
- No manager should engage in favoritism or allow personal biases to influence decisions related to hiring, promotions, or task assignments.
- No managers should overlook or dismiss reports of discrimination, harassment, or unfair treatment. Failing to act when such issues arise perpetuates inequality and creates a toxic work culture



For More information on People SharePoint

- REGIONAL EMPLOYEE HANDBOOKS

## 2.4. Combat harassment

### What is it about?

Harassment is a behavior that has the effect of being humiliating, abusive, aggressive and/or creating a hostile, intimidating, unstable or unpleasant working environment which undermines the dignity of the persons or group of persons who find themselves subject to such behavior.

There can be different kinds of harassment, such as moral or sexual harassment. Harassment can take several forms, such as:

- Verbal (inappropriate comments, unjustified reprimands, inappropriate jokes).
- In writing (inappropriate e-mails, text messages, unwarranted rebukes or reprimands) or images/videos of a suggestive nature.
- Visual (inappropriate staring).
- Physical (aggressive contact, unnecessary gestures or unwanted actions).

## What is Biocair doing in this area?

Biocair categorically and absolutely rejects any form of harassment, be it moral or sexual. Moreover, Biocair does not tolerate any behavior that might amount to harassment, such as toxic forms of management.

### Examples of the right things to do



- All employees should promptly report any instances of harassment (moral, sexual, or otherwise) they experience or witness within Biocair.
- All employees should support and stand up for colleagues who are being harassed, offering them assistance and helping them feel safe and valued.
- All employees should always behave professionally and respectfully towards others, ensuring that their actions and words do not create a hostile or uncomfortable work environment.
- All employees should actively participate in any anti-harassment training provided by Biocair to better understand how to prevent harassment and recognize inappropriate behaviors.
- All managers should respond swiftly and effectively to any reports of harassment, including investigating complaints, addressing the issue with the parties involved, and ensuring appropriate disciplinary action is taken if necessary.
- All managers should ensure that all employees are aware of the company's anti-harassment policies and enforce a zero-tolerance approach to any form of harassment.
- All managers should lead by example by demonstrating respectful and inclusive behavior, promoting open communication, and making sure that employees feel safe and supported in reporting harassment without fear of retaliation.

### Examples of the wrong things to do



- No employee should ignore or fail to report any harassment they experience or witness, whether it is moral, sexual, or any other form.
- No employee should make excuses for the harasser or turn a blind eye to harmful behavior.
- No employee should ever engage in, encourage, or participate in any form of harassment themselves, such as making inappropriate jokes or comments; making indecent gestures; inappropriate touching; engaging in humiliating, abusive, aggressive, or intimidating remarks of behavior.
- No employee should retaliate or mistreat colleagues who report harassment or stand up against it.
- No employee should minimize or dismiss complaints of harassment by suggesting that the victim is overreacting or that the behavior is harmless.
- No employees should ever continue with behavior or making remarks that have been reported as unwanted.
- No manager should ever ignore or dismiss reports of harassment
- No managers should ever retaliate or allow retaliation against employees who report harassment.



For More information on People SharePoint

- REGIONAL EMPLOYEE HANDBOOKS

## 2.5. Protect Personal Data

### What is it about?

Personal Data is any information relating to an identified or identifiable individual. It can be:

- Last name
- First name
- Photo
- Personal postal address
- Personal e-mail address
- Signature
- Personal bank account details
- Personal telephone number

### What is Biocair doing in this area?

By its very nature, Personal Data is a gateway to the private life of the person concerned. It is therefore essential to handle such data with the utmost care and confidentiality, in line with the applicable regulations.

Biocair processes this data with the utmost professionalism and in compliance with the most demanding legal and regulatory standards, especially those that concern the protection of Personal Data, information of collection, specification of the purpose, the exercise of employee rights.

Biocair undertakes to ensure the security and confidentiality of Personal Data. To do so:

- Biocair has technical processes in place to prevent any intrusions in our computer systems.
- Biocair has developed an authorization system to only allow accredited users to access certain data.
- Biocair has response systems in the event of a suspected cyberattack.
- Biocair restricts collecting, processing, storing and sharing Personal Data to the extent it is necessary.

### Examples of the right things to do



- All employees should respect employees' and Business Partners' privacy and ensure that personal data is kept confidential by not sharing it with unauthorized individuals, both within and outside Biocair.
- All employees should strictly follow Biocair data protection policies and procedures when handling, storing, processing or disposing of personal data.
- All employees should access and store personal data using secure systems, such as encrypted files and secure networks, and avoid using unsecured devices.
- All employees should promptly report any suspected data breaches, fraud or unauthorized access to personal data.
- All employees should only collect and process personal data that is necessary for the intended purpose, avoiding collecting unnecessary or excessive information.
- All employees should be mindful of the information they share on social media. They should share personal information only when necessary.
- All employees must use encryption tools for sensitive files and data and encrypt data stored on external devices and in the Cloud.

- All employees should complete all mandatory training on data protection, data privacy and data security.

### Examples of the wrong things to do



- No employee should share personal data with anyone who is not authorized, whether inside or outside the organization, and should ever interfere with teams' or Business Partners' privacy.
- No employee should bypass or ignore Biocair's data protection policies and procedures when handling, storing, processing, or disposing of personal data.
- No employee should access or store personal data on unsecured devices, networks, or platforms that are not protected with encryption or proper security measures.
- No employee should fail to report any suspicious data breaches, fraud, or unauthorized access to personal data.
- No employee should collect or process personal data that is unnecessary for the intended purpose, leading to excessive or irrelevant data collection.
- No employee should use Personal Data collected as part of our business activity for any purpose other than the purposes for which consent was given
- No employee should share Personal Data with third parties without the consent of the data subject or Biocair DPO.
- No employee should share personal details in public forums or with unknown contacts.



More information on ESG SharePoint

- [BIOCAIR DATA PRIVACY STANDARD](#)

## 2.6. Act to protect the environment

### What is it about?

Respecting and protecting the environment is crucial for the survival and prosperity of current and future generations because we are dependent on our ecosystem and the resources of our planet. The same is true for our activities, which can only develop sustainably if we consider daily our impact on the environment. As we all share the same address, we all have a responsibility to respect and protect our planet and work together to address the multiple environmental challenges such as combating air pollution, climate change, destruction of biodiversity, etc. We all have a role to play.

### What is Biocair doing in this area?

The sustainable development policy of Biocair is based on strong commitments, such as membership of the United Nations Global Compact, through GeoPost, since 2016 and support for its sustainable development goals. Biocair's sustainable development policy is an integral part of our corporate strategy and our annual action plans. It aims to reduce our environmental footprint in terms of greenhouse gas emissions, local air pollutants, resource conservation and promotion of a circular economy.

Known as, **Driving Change**, our program focuses on four priorities where we believe we can make the most difference for the environment:

- Decarbonization - Achieving Net Zero by 2040
- Biodiversity – Champion more diverse environment.
- Circularity – Enable more circular consumption
- Climate Actions – Reduce CO2 emissions in our operations

### Examples of the right things to do



- Follow Biocair's environmental policies and guidelines, ensuring all actions align with our goals to reduce environmental impact.
- Pay attention to energy consumption. Turn off lights, equipment, and electronics when not in use, and use energy-efficient devices to reduce energy consumption.
- Recycle paper, plastic, glass and any other recyclable materials and avoid unnecessary printing, striving for digital solutions wherever possible.
- Use resources like water, paper, and office supplies responsibly. Be mindful of overconsumption and aim to reduce waste and costs.
- Choose public transport, carpooling, or cycling to work (where possible) and consider remote working options when feasible to reduce the carbon footprint.
- Promote environmentally friendly practices within the workplace, such as using reusable coffee cups, reducing single-use plastics, and opting for digital files over paper.
- Report any environmental hazards or areas where improvements can be made, such as leaks, waste accumulation, or inefficient systems.
- Take part in, or support initiatives aimed at reducing Biocair's environmental footprint.
- Share knowledge about sustainability practices with colleagues and help create an awareness campaign for the environment within the workplace.
- Work with our suppliers and subcontractors to reduce their environmental impact.
- Complete training.

### Examples of the wrong things to do



- Not turning off lights, computers, or other electronics when not in use/needed. – it wastes energy and money.
- Printing excessively, using paper unnecessarily instead of opting for digital solutions, or only printing on one side.
- Frequently using disposable plastic items like cups, bottles, or cutlery instead of reusable alternatives.
- Disposing of recyclable materials in regular trash instead of recycling bins.
- Leaving taps/faucets running or using more water than necessary. This is wasteful.
- Using outdated equipment or appliances that consume more energy than necessary.
- Not participating in or supporting Biocair programs and initiatives aimed at reducing environmental impact.



For more information on ESG SharePoint

- BIOCAIR ENVIRONMENT STANDARD
- BIOCAIR BIODIVERSITY STANDARD
- BIOCAIR CARBON MANAGEMENT STANDARD
- BIOCAIR ENERGY MANAGEMENT STANDARD
- BIOCAIR RESPONSIBLE BUSINESS STANDARD



## 3. Integrity of Market and Business Activities

### 3.1. Prevent and combat corruption and influence peddling

#### What is it about?

#### CORRUPTION

Corruption consists mainly of a person (public or private), who, in the performance of their duties, accepts, solicits, or receives (passive corruption); or promises, offers or gives (active corruption):

An undue advantage (which can take different forms: money, services, property, travel, entertainment, advancement, hospitality, awards, agreements, contracts, titles, administrative approvals, privileges, kickbacks, etc.),

- for themselves or for others, or in favor of Biocair and/or GeoPost.
- in exchange for a favorable decision, action or abstention.
- in breach of their legal, contractual or professional obligations.

Intent is decisive in establishing the offence of corruption. This is why attempted corruption is a crime, even if the proposal is not followed up by any action or if no one benefits from it.

- The bribe-giver is the person who seeks to corrupt.
- The bribe-taker is the person who solicits or accepts an undue advantage

#### INFLUENCE PEDDLING

Influence peddling is an offence which consists of a person (public or private) who accepts, solicits or receives (passive influence peddling) or promises, offers or gives (active influence peddling):

- An undue advantage (which can take different forms: money, services, property, travel, entertainment, advancement, hospitality, awards, agreements, contracts, titles, administrative approvals, privileges, kickbacks, etc.), so that this person misuses their real or assumed influence to obtain, a favorable decision from a public authority or administration (awards, procurement contracts, employment, favorable decisions, etc.).

Like corruption, influence peddling is prohibited and reprehensible. These practices are illegal and punishable by heavy criminal sentences applicable to both the bribe-giver and the bribe-taker.

### What is Biocair doing in this area?

At Biocair, we comply with anti-corruption laws and oppose all forms of corruption by applying three key principles:

1. **Zero Tolerance:** We maintain an uncompromising stance against corruption, ensuring that any violation is met with strict consequences.
2. **Applies to Everyone:** Our commitment to anti-corruption extends to all employees, partners, and stakeholders, holding everyone to the same rigorous ethical standards.
3. **Everyone is Vigilant:** We foster a culture of vigilance, encouraging all members of Biocair to actively identify and report any suspicious activities or unethical behavior.

Biocair strives to prevent and detect risk in this area by providing a framework for the conduct of its Employees, by training them to detect irregularities and manage any difficulties, and by giving them the

### Examples of the right things to do



tools to implement, where appropriate, any corrective measures necessary.

- All employees should report immediately any suspected instances of corruption, bribery, or influence peddling, following Biocair's whistleblowing procedures.
- All employees should disclose any potential conflicts of interest that could influence decision-making or create the appearance of bias.
- All employees should refuse any offer of gifts, services, or favors that could be seen as attempts to influence decisions, especially if they are beyond what is considered normal business courtesies.
- All employees should follow all relevant laws, regulations, and Biocair's internal standards when making decisions that involve money, contracts, or relationships with external parties.
- All employees should ensure that all business transactions, especially with third parties, are transparent and documented, and can be reviewed if necessary.
- All employees should report the request to their manager or the Biocair Ethics Officer if asked to act in a way that seems to be aimed at influencing a decision unfairly.
- All employees should participate in Biocair's anti-corruption and anti-influence peddling training programs to better understand the risks and how to mitigate them.
- All employees should set a positive example by demonstrating honesty, fairness, and respect for Biocair's anti-corruption policies in all professional interactions.
- All employees should not engage in, support, or condone any form of bribery, corruption, or influence peddling, whether direct or indirect. It could result in termination or legal consequences.
- All employees should support internal audits and external investigations aimed at detecting and preventing corruption and influence peddling within Biocair.
- All employees should ask for advice from their manager or the Biocair Ethics Officer whenever they are in doubt or have any questions.

## Examples of the wrong things to do



- No employee should accept expensive gifts, entertainment, or favors from suppliers, customers, or business partners that could influence business decisions or create a perception of bias.
- No employee should offer, give, or receive bribes (such as money, gifts, or privileges) to gain an unfair advantage in business operations.
- No employee should choose not to report or investigate potential corruption or influence peddling, even when clear signs of wrongdoing are evident.
- No employee should circumvent Biocair's anti-corruption guidelines or procedures, such as approving undocumented transactions or neglecting due diligence.
- No employee should falsify records, such as manipulating financial documents, contracts, or transaction records to conceal improper payments or actions.
- No employee should promise kickbacks, facilitation payments or incentives to external parties, such as regulators or clients, to seek to obtain an undue advantage.
- No manager should discriminate against or punish employees who report corruption or unethical practices.
- No employee should agree to exchange favors, services, or contracts that benefit one party inappropriately in return for another party's cooperation.
- No employee should fail to complete mandatory anti-corruption training.

### CASE STUDY

#### Supplier Negotiations

Question - John, a Biocair employee, is negotiating a new contract with a supplier in a foreign country. During the discussions, the supplier offers John an all-expenses-paid trip to a luxury resort, suggesting that this could "help build trust and smooth the partnership process." What should John do?

Answer: - John should politely decline the offer and immediately report the incident to his manager or the Biocair Ethics Officer. Accepting such a gift could be perceived as bribery, potentially violating both Biocair's "Zero Tolerance" anti-corruption policy and local laws. Employees must ensure that all interactions are transparent, ethical, and free from undue influence, avoiding any behavior that could compromise Biocair's integrity or reputation.

### CASE STUDY

#### Gesture of Goodwill

Question - A regulatory inspector arrives at an office. Can I give him an excellent bottle of wine as a gesture of goodwill and show him that we welcome him with the respect he deserves?

Answer - In application of the Biocair Gifts and Hospitality Standard, you should never give anything of value to a third party, during a strategic period, which includes any situation in which Biocair is subject to a governmental audit or inspection. In addition, contrary to your initial objective, this could be perceived as a lack of respect by the inspector. Show your respect and cooperation by acceding to the inspector's requests and being courteous.



For more information on ESG SharePoint

- BIOCAIR ANTI-BRIBERY & CORRUPTION STANDARD

## Prohibit facilitation payments

### What is it about?

Facilitation payments are unofficial payments of small amounts intended to facilitate or fast-track the smooth running of simple procedures or administrative activities that the person paying is nonetheless entitled to expect. They are considered a form of corruption.

### What is Biocair doing in this area?

Biocair prohibits all facilitation payments, even in situations where local laws do not prohibit such payments. If an Employee's physical safety or integrity is threatened by a serious and imminent danger, Biocair may, as an absolute exception, tolerate such payments. In such situations, the Manager and/or the Ethics Officer shall be notified as soon as possible and any payments made shall be properly identified and recorded in the relevant accounting documents and records.

### Examples of the right things to do



- All employees must never pay or accept any unofficial or "under-the-table" payments to expedite official processes or services.
- All employees should immediately report it to their manager or Biocair's Ethics Officer if they are asked for a facilitation payment.
- All employees should always follow the formal processes and regulations to complete tasks or obtain approvals, without resorting to illegal or unethical shortcuts.
- All employees should familiarize themselves with Biocair's anti-bribery and corruption Standard to understand how to handle such situations and the consequences of such actions.
- All employees should support a culture of ethics and integrity by discouraging facilitation payments and encouraging colleagues to do the same.
- All employees should seek advice from their manager or the Biocair Ethics Officer before proceeding if they are unsure about a situation involving facilitation payments.
- All employees should never engage in, endorse, or support any kind of facilitation payment, whether made directly or through intermediaries.
- All employees should ensure that all actions taken are properly documented and in accordance with legal and Biocair requirements if there is a legitimate need for an expedited process.
- All employees should immediately report any instances where facilitation payments are suggested, offered, or demanded by government officials or business partners.
- All employees should conduct all business operations with the highest level of integrity and transparency, ensuring that no actions are taken that could be seen as attempting to bypass legal or

regulatory processes.

- If, because of personal safety considerations, a payment needs to be paid, before making a payment, always be mindful of the reasons for the payment and check that the amount requested is commensurate with the products and services provided; always ask for a receipt stating the reason for payment

### Examples of the wrong things to do



- No employee should make or accept any "under-the-table" payments to speed up official processes or services, unless their safety or physical integrity is threatened.
- No employee should ignore requests from government officials, suppliers, or any third party asking for facilitation payments. Such requests must be immediately reported.
- No employee should ever agree to offer, promise, or pay facilitation payments to expedite procedures or gain favors in business dealings.
- No employee should encourage, pressure, or coerce colleagues or external parties to make such payments.
- No employee should make payments to government or regulatory bodies or third parties in exchange for faster processing or decision-making, even if delays are inconvenient.
- No employee should justify making facilitation payments based on the idea that such payments are a common practice in certain regions.
- No employee should attempt to hide or misreport facilitation payments in Biocair accounts, invoices, or records.
- No employee should proceed with a facilitation payment when unsure. They should always seek advice from their manager or the Biocair Ethics Officer.

### CASE STUDY

#### **Expediting a License**

Question - Sarah, a Biocair employee, is applying for an import license critical to a client's shipment. A government official suggests the process could be expedited if Sarah pays a small cash fee 'under the table'. What should Sarah do?

Answer - Sarah should refuse to make the payment and report the incident to her manager or the Biocair Ethics Officer immediately. Facilitation payments are prohibited under Biocair's policies, even if they are common practice locally. Sarah should follow standard procedures to escalate the issue, ensuring the process remains transparent and in compliance with Biocair's commitment to ethical business practices.



For more information on ESG SharePoint

- BIOCAIR ANTI-BRIBERY & CORRUPTION STANDARD

## Giving and receiving Gifts and Hospitality

### What is it about?

The normal course of business sometimes requires offering or receiving Gifts and/or Hospitality. Depending on the value they represent, the circumstances in which they are offered or received, the identity of the people offering and/or receiving them, Gifts and Hospitality may be accepted. However, they should lead the recipient and/or giver to examine whether they are acceptable.

### What is Biocair doing in this area?

Biocair has defined a specific Gifts and Hospitality Standard with rules on offering and receiving Gifts and Hospitality so that they can be offered or accepted in a way that is appropriate, legitimate, transparent, and which would not present any risks of participating in the commission of an offence.

### Examples of the right things to do



- All employees should strictly follow Biocair's guidelines when offering or receiving gifts and hospitality to ensure that these actions are transparent, appropriate, and compliant with the Biocair Gifts and Hospitality Standard.
- All employees should only offer or accept gifts or hospitality that are modest in value, appropriate for the business context, and do not create any expectation of undue influence or favoritism.
- All employees should disclose to their manager or the Biocair Ethics Officer if they are offered a gift or hospitality that could potentially be seen as influencing a decision. Gifts or hospitality should be given or received with the intent of fostering positive business relationships, not as an attempt to influence business decisions or gain personal advantages.
- All employees should document any gift or hospitality given or received and report it using the Biocair Gifts and Hospitality Declaration Form following the procedure set out in the Biocair Gifts and Hospitality Standard.
- All employees should seek advice or approval from their manager or the Biocair Ethics Officer if they are unsure about whether a gift or hospitality is acceptable.
- All employees should not accept gifts that are excessive in value or lavish in nature, as this could be perceived as bribery or an attempt to influence business decisions.
- All employees should make it clear to business partners that any gifts or hospitality given or received must comply with Biocair's Gifts and Hospitality Standard.
- All employees should be aware of and respect the local laws and cultural norms regarding gifts and hospitality, ensuring that their actions are always in compliance with both the Biocair Gifts and Hospitality Standard and legal requirements.

## Examples of the wrong things to do



- No employee should accept gifts or hospitality that are too expensive or extravagant.
- No employee should offer gifts or hospitality with the intent of influencing business decisions or gaining any personal advantage.
- No employees should accept or offer gifts or hospitality without reporting them in accordance with Biocair's Gifts and Hospitality Standard.
- No employee should accept gifts or hospitality from third parties involved in contract negotiations or business deals.
- Employees should not offer or accept gifts during critical times such as before a major business decision or contract signing.
- Gifts intended for personal relationships should not be presented in a business context as it could cause a conflict of interest.
- Employees should not accept or offer gifts as a form of exchange for personal services or favors, especially if it creates a conflict of interest or appears unethical.

### CASE STUDY

#### **A Service Provider Offers Tickets to A Concert**

Question - As part of a competitive bidding process for IT services, Biocair starts contractual negotiations with the prospective service provider. On this occasion, the service provider invites Paul, Biocair's project manager, to a concert by a rock band that he is particularly fond of. What should Paul do?

Answer - This hospitality outside a business setting is even more inappropriate as it comes in the middle of negotiations. It should therefore be refused. Paul shall continue to be free to choose a service provider without undue influence.



For more information on ESG SharePoint

- [BIOCAIR GIFTS & HOSPITALITY STANDARD](#)



## Managing relationships with Business Partners

### What is it about?

Within the framework of its business relationships, Biocair may be in contact with various Business Partners, including Intermediaries.

An Intermediary is an individual or legal entity acting for and/or on behalf of GeoPost SA and/or Biocair (e.g. consultant, individual or legal entity involved in a commercial negotiation to enable or facilitate the conclusion of one or more contracts).

In certain circumstances, Biocair could be held liable for corrupt acts committed by its Business Partner. It is therefore necessary to supervise relationships with Business Partners to avoid this type of risk

### What is Biocair doing in this area?

The use of Business Partners requires undertaking strict precautions and conducting prior comprehensive analysis to ensure the reputation and integrity of Business Partners. Biocair is committed to assessing its Business Partners both upstream and during the business relationship.

### Examples of the right things to do



- All employees should ensure that they conduct comprehensive due diligence background checks on potential business partners to assess their reputation, financial stability, and integrity.
- All employees should adhere to Biocair's internal policies and ethical standards when selecting, engaging, and maintaining relationships with business partners. All dealings with business partners should be transparent and well-documented, with clear contracts and agreements that outline roles, responsibilities, expectations, and that include appropriate anti-corruption clauses.
- All employees should ensure that the agreed remuneration of the business partner is reasonable and commensurate with the services provided.
- All employees should disclose any potential conflicts of interest when engaging with business

partners and refrain from entering into relationships that could compromise their professional judgment.

- All employees should regularly monitor and evaluate business partners to ensure they comply with legal, regulatory, and ethical standards throughout the duration of the partnership.
- All employees should maintain open, honest, and respectful communication with business partners, addressing concerns and resolving disputes in a professional manner.
- All employees should clearly define the expectations, goals, and terms of the relationship with business partners from the outset, ensuring mutual understanding.
- All employees should set an example of integrity and professionalism in all interactions with business partners, fostering a culture of trust and ethical business practices. If they have any doubts or questions, they should seek advice from their manager and/or the Biocair Ethics Officer.
- All employees should report their concerns immediately if any unethical behavior or breaches of Biocair's policies are observed in dealings with business partners.
- All employees should aim to build lasting, mutually beneficial relationships with business partners,

### Examples of the wrong things to do



based on shared values of trust, fairness, and respect.

- No employee should skip the necessary due diligence background checks on potential business partners
- No employee should enter into partnerships without clear, written agreements and having followed the mandatory procurement process.
- No employee should agree to or neglect to include anti-corruption clauses in contracts with business partners. Not doing so could expose Biocair to legal and ethical violations. Because it is an intermediary that participates in a corruption scheme does not necessarily exonerate Biocair.
- No employee should attempt to influence business partners inappropriately or engage in negotiations that could be perceived as unethical - offering or accepting bribes or kickbacks.
- No employee should ever act unethically by engaging in business relationships that are based on personal gain, rather than the interests of Biocair.
- No employee should ignore or cover up any violations of Biocair's policies or unethical conduct by business partners.

#### CASE STUDY

##### **Arrangements Between Sales Representatives**

Question - A sales representative at a Biocair customer company suggests that Nicholas, the Biocair Sales Director, charges more than the value of the services provided to help him achieve his sales targets. In exchange, the contact asks Nicholas to hand over 3% of the amount he earns for Biocair. What should Nicholas do?

Answer - At Biocair, transparency and honesty are key. Here, the client's request implies that Nicholas pays them a sum of money in exchange for overcharging, which they would overlook. This is not transparent, not honest and not legal! It constitutes corruption and is punishable by criminal sanctions both for the sales representative making this suggestion (even if Nicholas does not accept) and for Nicholas, as soon as he gives in to the suggestion. Nicholas should therefore not accept this suggestion and inform the Biocair Ethics Officer.

#### CASE STUDY

### Sharing Gains from Theft

Question - While discussing a transport contract with a subcontractor, the subcontractor casually mentions to Carlos, the Transport Manager, that if goods are stolen during transport, they could “share the gains” by not reporting the theft. What should Carlos do?

Answer - Carlos should immediately reject the subcontractor's suggestion and report the incident to their manager and the Biocair Ethics Officer. Sharing in the gains from theft is illegal and unethical, and accepting such an offer would violate Biocair's Anti-bribery and Corruption Standard. Carlos should ensure that the incident is properly documented and take steps to terminate any further engagement with the subcontractor, as their actions could expose Biocair to significant legal and reputational risks.

#### CASE STUDY

### Appeals to Your Generosity During a Tender Process

Question - Laura, the Biocair Business Development Manager, has responded to a tender process for delivery services. The customer explains to Laura that he is involved in a charity that supports schools in the town where he grew up and leads you to understand that the support Biocair could provide for this charity might make it stand out from the other competing companies in the tender process. What should Laura do?

Answer - Laura should politely decline any suggestion or offer that ties the charity support to the tender process. She should avoid any actions that could be perceived as attempting to influence the buyer's decision unfairly. Instead, Laura should focus on Biocair's strengths and ensure that the tender process remains transparent, ethical, and free from conflicts of interest. She should report the incident to her manager and the Biocair Ethics Officer to ensure compliance with Biocair's Anti-bribery and Corruption Standard, and to assess the situation from an ethical standpoint. Supporting the charity should be considered separately from the business relationship, and any actions related to the charity should be conducted independently of the tender process.



For more information on ESG SharePoint

- BIOCAIR GIFTS & HOSPITALITY STANDARD
- BIOCAIR ANTI-COMPETITIVE PRACTICES STANDARD



## 3.2. Prevent and manage conflicts of interest

### What is it about?

A conflict of interest is a situation in which the private interest of a person is likely to affect, or be perceived as affecting, the independent, impartial, and objective performance of their professional duties.

Conflict of interest situations can take many forms:

- Resulting from a situation that affects us directly or indirectly, through our family, friends or close acquaintances.
- Be financial (such as shareholdings in another company), material, emotional, political, or charitable.
- Occur in the context of various employment duties such as selecting suppliers, recruiting employees, negotiating prices with a customer, setting up sponsorship, etc.

Some illustrations of situations in which there is a conflict of interest:

- Owning an interest in a company that may be a competitor, customer or supplier of Biocair.
- Having a personal or familial relationship with someone who is applying for a job at Biocair.
- Supervising, assessing or managing the performance of an Employee who is a relative or has a close personal relationship with you.
- Having a personal relationship with a person who works for a company that may be a competitor, customer or supplier of Biocair.

### What is Biocair doing in this area?

Because conflicts of interest can affect the ability to make objective and unbiased decisions in the best interests of Biocair and sometimes conceal improper practices, Biocair has implemented a Conflict-of-Interest Standard which states, in particular, that:

- All Employees shall be made aware of the concept of conflict of interest and the applicable rules in this area,
- All Employees shall declare any real or potential conflict of interest to their Manager as soon as it occurs.
- Certain identified persons,, including at the very least, a sample of decision-makers, shall confirm at least once a year that they are not involved in a conflict-of-interest situation.
- All declarations of conflict of interest shall be assessed by the employee's manager and, if necessary, the Ethics Officer.
- Any actual conflict of interest shall lead to the implementation of remedial measures aimed at addressing or neutralizing such conflict.

### Examples of the right things to do



- All employees should immediately disclose any potential or actual conflicts of interest to their manager or the Biocair Ethics Officer as soon as they arise.
- All employees should recuse themselves from any related decision-making process if they have a personal, financial, or familial interest that may influence their professional decisions.
- All employees should follow Biocair's Conflicts of Interest Standard for managing conflicts of interest, including completing any necessary declarations or disclosures.
- All employees should always make decisions based on the best interests of Biocair, without allowing personal interests or relationships to influence their professional judgment.
- All employees should regularly review their personal circumstances regarding potential conflicts and report any changes in their situation.
- All employees should refrain from participating in hiring, promotion, or business decisions where a family member or close personal relationship could be perceived as influencing the process.
- All employees should ensure that all business dealings are conducted transparently and in a way that avoids any appearance of bias or personal gain influencing the outcome.
- All employees should disclose any financial interests in companies that may compete with, supply, or do business with Biocair to avoid any perceived or actual conflicts.
- All employees should always prioritize Biocair's interests over personal gain, ensuring that any actions taken are in alignment with Biocair's values of integrity and transparency.
- All employees should seek advice from their manager or the Biocair Ethics Officer if they are unsure whether a situation presents a conflict of interest or not.

### Examples of the wrong things to do



- No employee should ever deliberately fail to disclose any potential or actual conflicts of interest to their manager and/or Biocair's Ethics Officer.
- No employee should participate in decisions where they have a personal, financial, or familial interest that could influence their professional judgment.
- No employee should disregard Biocair's Conflict of Interest Standard or fail to complete necessary declarations or disclosures when there is a potential conflict.
- No employee should ever let personal relationships or interests, such as friendships or business affiliations, interfere with their work or influence decisions that impact Biocair's interests.
- No employee should make decisions that could be perceived as biased or influenced by personal

gain.

- No employee should ever omit or withhold critical information from their manager or the Ethics Officer if they suspect a conflict of interest among their colleagues.
- No employee should ever select, or help to select, for a contract, a supplier with which they or one of their relatives have an interest.
- No employee should use confidential information for their own benefit or a relative's benefit.
- No employee should influence the hiring, performance assessment, or determination of the salary of a relative.

#### CASE STUDY

##### **Selecting a Supplier with a Family Connection**

Question - Leo, a Biocair procurement manager, is responsible for selecting a supplier for Biocair's logistics needs. One of the suppliers under consideration is a business owned by his cousin. What should Leo do?

Answer - Leo should disclose his family connection to the supplier to his manager and the Biocair Ethics Officer. He should remove himself from the decision-making process to avoid any potential conflict of interest. The selection of the supplier should be made transparently and based on objective criteria, ensuring that the decision is in the best interest of Biocair.

#### CASE STUDY

##### **Steven's Brother**

Question - Steven's brother is an advisory consultant involved in decision-making at BioSource, which is one of Steven's clients. Steven works in sales and has had no contact with BioSource up to this point. Steven has just been asked to manage the BioSource account. What should he do?

Answer - Firstly, Steven should tell his manager about his brother's role in BioSource because in his new role Steven will have discretionary authority in his dealings with BioSource. If Steven's Manager still wants to assign him the BioSource account, Steven should ask her for written approval.



For more information on ESG SharePoint

- BIOCAIR CONFLICTS OF INTEREST STANDARD

### 3.3. Establish responsible relationships with Business Partners

#### What is it about?

Our delivery and services partners allow us to respond in an agile manner to our customers' needs while creating local employment. They are therefore a key factor in our value chain and transport network. That is why we need to work with Business Partners who share the same professional and ethical standards throughout our value chain.

This means including an ethical, social and environmental dimension in our choice of Business Partners and associating them with a common approach to ensure and enhance respect for human rights, health and safety, and the environment.

#### What is Biocair doing in this area?

Biocair implements third-party due diligence procedures to assess the integrity of Business Partners considered for a business relationship, the risks such relationship may present and ways of remedying them.

Biocair also expects its Business Partners to ensure that their own business partners meet the same ethical standards.

#### Examples of the right things to do



- All employees should conduct thorough due diligence when selecting business partners to assess their integrity, reputation, and alignment with Biocair's ethical, social, and environmental standards.
- All employees should establish clear expectations and mutual responsibilities with business partners regarding compliance with legal, regulatory, and ethical requirements.
- All employees should foster open and transparent communication with business partners to ensure that both parties understand each other's values and objectives.
- All employees should regularly monitor the performance of business partners to ensure continued compliance with Biocair's standards and report any concerns of non-compliance.
- All employees should engage in fair and ethical negotiations with business partners, avoiding any actions that could compromise integrity or transparency.
- All employees should encourage business partners to hold their own suppliers and subcontractors to the same ethical and social standards.
- All employees should promptly report any ethical concerns or conflicts to their manager or Biocair's Ethics Officer.

#### Examples of the wrong things to do



- No employee should ever turn a blind eye to red flags that would call into question the integrity of a third party with whom we have or are planning to have a business relationship.



For more information on ESG SharePoint

- BIOCAIR SUSTAINABLE PROCUREMENT CHARTER

## 3.4 Managing donation and sponsorship initiatives

### What is it about?

Commitment to civil society consists of investing in the support of causes, charities, associations, projects or events by making human, material or financial resources available. When this commitment is made on a philanthropic basis, with no expectation of a return, it is called a donation. When a contribution from Biocair enables promotion of the Biocair brand in connection with the project or event supported, it is called sponsorship.

### What is Biocair doing in this area?

At Biocair, we want to make a positive contribution to civil society by mobilizing our own strengths and skills for the benefit of others. To this end, Biocair:

- Provides human resources through the donation of working skills.
- Participates in charity and sporting events for the benefit of associations/charities it supports.
- Organizes solidarity collections.

The aim of Biocair is to allow its Employees to get involved in the actions that are important to us. By contributing to maintaining links between people, we make a difference.

- All employees should ensure that all donations and sponsorships made are transparent and in line with Biocair's Charity Donations Standard or Biocair's Sponsorship Standard, and that they have

### Examples of the right things to do



obtained the necessary approval before proceeding to transfer funds or contributions in the name of or on behalf of Biocair.

- All employees should ensure all donations are documented, and the rationale for the donation or sponsorship should be clear and justifiable.
- All employees must disclose any personal or financial interests in the organization or cause receiving a donation or sponsorship to avoid any conflict of interest.
- All employees must ensure that Biocair's donations and sponsorships are not used as a means of gaining undue influence, favors, or business advantages. Any form of corruption, bribery, or "pay-to-play" arrangements should be strictly avoided.
- All employees should ensure that the causes and organizations that Biocair supports through donations or sponsorships align with the company's ethical standards, corporate social responsibility (CSR) goals, and values.
- If employees are concerned that donations or sponsorships are being misused, mismanaged, or directed to unethical causes, they should raise these concerns with the Biocair Ethics Officer, or through the whistleblowing reporting platform.
- All employees should perform due diligence before entering into sponsorship agreements or making donations, ensuring that the recipient organization is legitimate, financially sound, and compliant with relevant regulations.
- All employees must ensure that all donations, sponsorships, and engagements with civil society comply with local and international laws and regulations.
- All employees should ensure that Biocair's sponsorships and donations are accessible and inclusive,

supporting a diverse range of causes and ensuring that sponsorship opportunities are available to all deserving organizations, not just those with personal connections.

- All employees should ensure that any communication related to Biocair's sponsorships or donations (e.g., press releases, marketing materials, or social media posts) is honest and accurate, and approved by Marketing before publication.

### Examples of the wrong things to do



- No employee should ever bypass Biocair's approval processes or neglect to follow the Biocair Charity Donations Standard or Biocair Sponsorship Standard when making donations or sponsorships.
- No employee should make undocumented or undisclosed donations or sponsorships, as this can create the appearance of impropriety or mismanagement.
- No employee should direct donations or sponsorships to organizations where they or their family members have personal or financial interests without disclosing this and obtaining approval.
- No employee should ever use donations or sponsorships to gain business advantages, influence decision-makers, or secure contracts.
- No employee should donate to or sponsor organizations such as political parties, trade union groups, religious groups, political lobby groups or organizations that are involved in illegal or unethical activities.
- No employee should fail to conduct due diligence on the recipient organization, avoiding exposing Biocair to reputational or legal risks.
- No employee should allocate sponsorships or donations based solely on personal connections or preferences, rather than on objective and fair criteria.
- No employee should ignore or fail to report signs of misuse, mismanagement, or unethical behavior by organizations receiving Biocair's donations or sponsorships.
- No employee should engage in donation or sponsorship activities that violate local or international laws, such as supporting organizations that are not properly registered or lack financial transparency.
- No employee must pressure or lobby others to participate in charities, or charity activity/sponsorship.



For more information on ESG SharePoint

- BIOCAIR CHARITY DONATIONS STANDARD
- BIOCAIR SPONSORSHIP STANDARD



### 3.5 Demonstrating neutrality when contributing to public life

Participating in public life strictly in line with applicable laws and regulations

#### What is it about?

Economic stakeholders' participation in political life mainly consists in sharing their experience and expertise in business sectors concerning them, which is also known as lobbying or representation of interests. This can be carried out directly or through professional organizations. These practices are increasingly regulated and require more and more transparency.

#### What is Biocair doing in this area?

As a responsible business, Biocair uses its best judgment and probity when meeting with public officials to explain its position on a particular issue.

Biocair always complies with applicable regulations. Accordingly, Biocair will never attempt to exert improper influence over a public official or lawmaker to obtain a decision in Biocair's interest.

#### Examples of the right things to do



- All employees should ensure that all interactions with public officials, lawmakers, and regulators are transparent, truthful, and conducted in good faith.
- All employees must comply with all local and international laws and regulations governing lobbying, advocacy, and contributions to public life.
- All employees should clearly identify themselves as representatives of Biocair during any lobbying or advocacy activities, ensuring openness about their objectives and interests.
- All employees should use public interactions to provide accurate, evidence-based insights and expertise relevant to Biocair's business sector, without exerting undue influence.

- All employees must remain neutral and avoid aligning Biocair with specific political parties, candidates, or causes. If offering a political opinion, employees must ensure that political opinions and actions are clearly identified as personal and individual, and do not involve Biocair.
- All employees should document and report all lobbying and advocacy activities to their manager and Biocair's Ethics Officer to ensure accountability.
- All employees should only engage with public officials through professional organizations or recognized industry associations whenever possible.
- All employees should seek advice from their manager or Biocair's Ethics Officer if they are uncertain about the appropriateness of a specific activity or interaction
- All employees should ensure that any contributions to public life reflect Biocair's commitment to integrity, fairness, and corporate responsibility.

### Examples of the wrong things to do



- No employee should misrepresent themselves or Biocair's interests during interactions with public officials, lawmakers, or regulators.
- No employee must attempt to exert improper influence over public officials to gain advantages for Biocair.
- No employee should align Biocair with specific political parties, candidates, or campaigns, as this compromises the company's neutrality.
- No employee must make undocumented or unauthorized lobbying efforts on behalf of Biocair.
- No employee should offer gifts, favors, bribes, or financial incentives to public officials to secure favorable outcomes for Biocair.
- No employee should use personal relationships with public officials to bypass proper channels or procedures.
- No employee should engage in lobbying activities that violate local or international laws, regulations, or ethical guidelines.
- No employee should fail to seek guidance from their manager or the Ethics Officer when uncertain about the appropriateness of a lobbying activity or interaction.
- No employees should join a professional body in the name of or on behalf of Biocair without complying with any applicable internal approval procedures.
- No employee should endorse a candidate in an election in the name of or on behalf of Biocair.

### For more information on ESG SharePoint



- BIOCAIR ANTI-BRIBERY & CORRUPTION STANDARD
- BIOCAIR CONFLICT OF INTEREST STANDARD
- BIOCAIR GIFTS & HOSPITALITY STANDARD
- BIOCAIR ANTI-COMPETITIVE PRACTICES STANDARD

## Refrain from contributing to financing political life

### What is it about?

Depending on the country, companies may be permitted or, on the contrary, prohibited from contributing to political life by funding political parties, election campaigns, or candidates for public office.

### What is Biocair doing in this area?

To avoid any confusion between the convictions of Biocair and the interests of political representatives, Biocair refuses to participate in financing political life in any country.

At Biocair, our Employees are totally free to participate as active citizens in the political life of their communities, including supporting political parties, elected officials, candidates, etc. However, any such involvement should be outside of working hours and not involve Biocair resources or mention the name of Biocair.

### Examples of the right things to do



- All employees should refuse any request for a contribution to finance a political action or political party, in Biocair's name or on its behalf.

### Examples of the wrong things to do



- No employee should purchase tickets to a political fundraising event using Biocair funds or on behalf of Biocair
- No employee should use Biocair resources (working time, telephones, e-mail addresses, etc.), to conduct or support political activities in a personal capacity
- No employee should make or authorize any expenses which involve direct or indirect (e.g. through a foundation) payment to a political party.



For more information on ESG SharePoint

- BIOCAIR ANTI-BRIBERY & CORRUPTION STANDARD
- BIOCAIR CONFLICT OF INTEREST STANDARD

## 3.6 Promote fair competition

### What is it about?

Competition law aims to preserve free competition and innovation by prohibiting certain practices such as cartels (for example, market sharing or price fixing), and abuses of dominant position when the purpose of these practices or their effect is to distort competition on markets. Competition law also regulates the commercial relations of the company with its partners.

In addition to ultimately harming consumers, violations of competition law can result in substantial fines, including up to 10% of the worldwide sales of the group to which the sanctioned company belongs.

## What is Biocair doing in this area?

Biocair conducts its activities in the strictest compliance with anti-competitive practices regulations and implements policies and procedures to meet this requirement.

### Examples of the right things to do



- All employees should familiarize themselves with the principles of competition law and ensure they comply with all relevant regulations and Biocair's internal policies.
- Biocair should independently determine Biocair's pricing, terms, and strategies without influence from competitors.
- All employees should promptly report any concerns or suspicions of anti-competitive behavior, whether within Biocair or involving external partners, to their manager or the Biocair Ethics Officer.
- All employees should ensure that all communications with competitors or partners are transparent and in compliance with legal and ethical guidelines.
- All employees should safeguard Biocair's confidential information and avoid improperly obtaining competitors' confidential information.
- All employees should ensure that the information received about competitors comes from publicly available sources or has been obtained in a legitimate manner
- All relevant employees should complete all the training Biocair provides regarding competition law and fair business practices.
- All employees should ensure that all commercial relationships with suppliers, customers, and partners are conducted on a fair and objective basis.
- If employees are uncertain about the legality of a specific action or agreement, they should seek guidance from the Legal Department or Biocair Market Integrity Local Compliance Officer (MILCO) before proceeding.
- All employees should maintain proper documentation of decisions and agreements to ensure they can demonstrate compliance with competition laws if required.
- Before approving the acquisition of shares by Biocair, employees must check with the Legal and Compliance Department of GeoPost SA to verify if the transaction requires a filing with the national or European competition authorities.
- All employees should terminate any discussions or leave any meetings where commercially sensitive information is exchanged between competitors. Employees should publicly distance themselves from these exchanges and notify the Biocair Market Integrity Local Compliance Officer (MILCO) and Legal Department.

### Examples of the wrong things to do



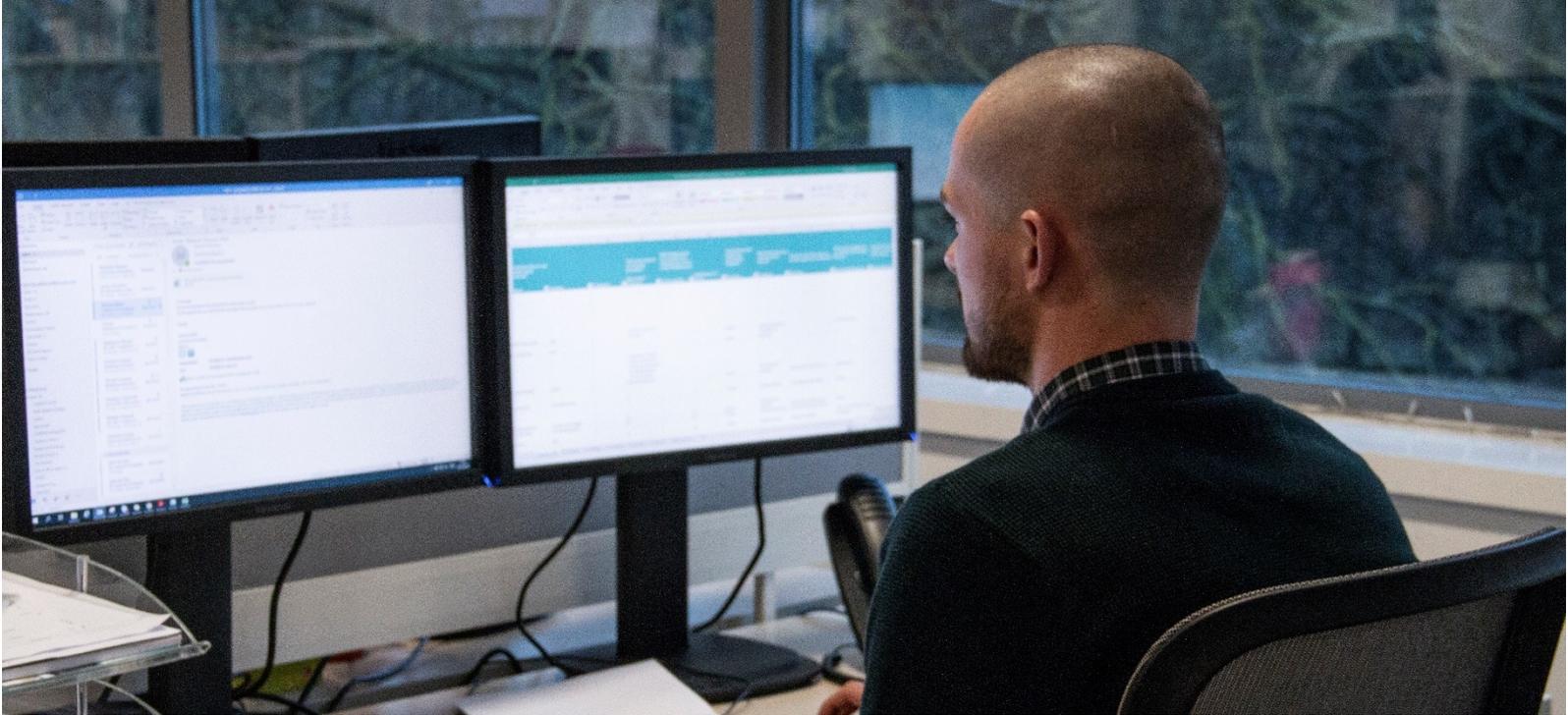
- No employee should engage in discussions or agreements with competitors about prices, market sharing, or other sensitive commercial information
- No employee should share confidential or proprietary information about Biocair's pricing, customers, or strategies with competitors and must never make agreements with competitors on prices, discounts, market shares, and customer allocations.

- No employee should participate in meetings or informal discussions where anti-competitive practices, such as price-fixing or market-sharing, are being proposed or discussed.
- No employee should attempt to obtain competitors' confidential information through improper means, such as misrepresentation, theft, or hiring employees of competitors to access such information.
- No employee should enter into exclusivity agreements or arrangements with suppliers or customers that could unfairly restrict competition.
- No employee must sign agreements or engage in conduct that restricts trade or distorts competition without consulting the Legal Department or Market Integrity Local Compliance Officer (MILCO).
- No employee should engage in misleading, disparaging, or untruthful communications about competitors to gain a business advantage.
- No employee should participate in boycotts or agreements to exclude certain suppliers, customers, or competitors from the market.
- No employee should refer to the fact that Biocair is "dominant" in a market. It would be preferable to use the term "leader"
- No employee should discuss, even in an informal manner, commercially sensitive information with competitors such as the identity of customers, the prices Biocair charges them, the tenders Biocair participates in, Biocair's discount policy, Biocair employee compensation, the terms of sales promotions, special sales conditions, or business strategies.



For more information on ESG SharePoint

- [BIOCAIR ANTI-COMPETITIVE PRACTICES STANDARD](#)



### 3.7 Use responsible marketing practices

#### What is it about?

Marketing plays a central role in making our company, services and offers known to our customers. It showcases the services we can offer.

#### What is Biocair doing in this area?

At Biocair, we strive to provide our services to customers in a way that is consistent with our values and ethics. At the very least, Biocair ensures that all its advertising complies with applicable laws and regulations, including consumer protection laws.

#### Examples of the right things to do



- Marketing employees should ensure that all marketing materials, including advertisements, brochures, and digital content, accurately reflect Biocair's services and capabilities without exaggerating or misleading customers.
- Marketing employees must ensure that all marketing efforts comply with relevant local and international regulations, including consumer protection laws, advertising standards, and data protection laws.
- Marketing employees should ensure that any offers, discounts, or promotions are clearly communicated and not misleading. All terms and conditions should be clearly stated to avoid confusion.
- All employees should handle customer data responsibly, ensuring that any marketing activities comply with data protection regulations, and customers' privacy is respected.
- Marketing employees should ensure that marketing materials are culturally sensitive, respectful, and do not include any content that could be seen as discriminatory, offensive, or inappropriate.
- If comparing Biocair's services to competitors, marketing employees should ensure the comparison

is fair, based on factual, verifiable information, and not disparaging to competitors.

- Marketing employees should ensure that customer testimonials and reviews used in marketing materials are genuine and have been obtained with the customer's consent.
- When collaborating with influencers or third-party affiliates, marketing employees should ensure that these partners adhere to Biocair's ethical marketing standards and transparency.
- Marketing employees should ensure that marketing materials and campaigns undergo an internal review process to ensure compliance with Biocair's ethical guidelines and legal standards before being published.
- Marketing employees should focus on providing value through offering content that informs customers about services, benefits, and industry trends without exaggerating claims or creating unrealistic expectations to help customers understand exactly what Biocair is offering.

#### Examples of the wrong things to do



- No employee should exaggerate or misrepresent Biocair's services, capabilities, or results in marketing materials, creating unrealistic expectations for customers.
- No employee should make unfair, inaccurate or vague comparisons between Biocair and competitors, especially if the comparisons are based on false, unverifiable information, or are designed to damage the competitor's reputation.

### 3.8 Adhere to international trade compliance programs

#### What is it about?

Some states or international organizations, such as the United Nations, the European Union, the United Kingdom or the United States, adopt international, economic and/or financial sanctions programs that are aimed at prohibiting or restricting trade of targeted goods, technologies, software, and/or services within the territory of certain states, or with governments, individuals and/or companies included on national and/or international sanctions lists.

These programs aim to sanction states, entities and persons who violate international law or export control measures and/or jeopardise the interests or national security of the states or organizations concerned. These regulations are multiple and change rapidly.

#### What is Biocair doing in this area?

Our international activity leads us to be present in several countries. As such, Biocair ensures compliance with international sanctions regulations. To that end, Biocair has a central team dedicated to analyzing and monitoring risk situations under sanctions and export controls programs relating to international trade.

#### Examples of the right things to do



- All relevant employees should ensure that all products are correctly classified according to the Harmonized System (HS) codes, and that tariffs and duties are accurately calculated to comply with international trade requirements.
- All relevant employees should conduct thorough background checks and due diligence on suppliers,

customers, and logistics partners to ensure they are reputable and comply with international trade laws and regulations.

- All relevant employees should ensure that all shipments are accompanied by the required documentation in compliance with both the destination and origin countries' laws. (especially for high-risk countries)
- All relevant employees must ensure that all products are handled, stored, and transported in compliance with product-specific regulations, (Good Distribution Practice (GDP) and/or Good Manufacturing Practice (GMP)).
- All relevant employees should regularly review any trade sanctions, embargoes, or export restrictions imposed by governments to ensure that Biocair does not engage in transactions with entities or countries subject to international sanctions/embargos.
- All relevant employees should be aware of and strictly follow anti-bribery and anti-corruption regulations (such as the U.S. Foreign Corrupt Practices Act and the UK Bribery Act), ensuring that no illicit payments or unethical practices are involved in international transactions.
- All relevant employees should complete regular training on international trade compliance and regulations, ensuring they are up to date on any changes to laws or guidelines.
- All employees should report any concerns related to non-compliance with international trade regulations or unethical behavior to their manager, the Biocair Local Embargo Compliance Officer (LECO), or through Biocair's whistleblower platform.
- All employees should follow the instructions of the specialist teams or request advice at: [regulatorycomplianceteam@biocair.com](mailto:regulatorycomplianceteam@biocair.com) if you have any questions

#### Examples of the wrong things to do



- No employee should ignore or bypass international sanctions, embargoes, or export restrictions, and should never use third parties to bypass restrictions.
- No employee should incorrectly classify products, leading to incorrect tariff classifications or miscalculations of duties and taxes.
- No employee should engage with suppliers, customers, or logistics partners who have not been approved by the Compliance Team.
- No employee should ignore guidance or advice from Biocair's regulatory compliance teams, especially in situations of uncertainty about trade regulations.



For more information on ESG SharePoint

- [BIOCAIR GLOBAL TRADE COMPLIANCE POLICY](#)

## 3.9 Prevent and combat money laundering

### What is it about?

Money laundering consists of concealing the nature and origin of funds derived from unlawful activity by incorporating this “dirty money” into legal transactions. The aim is to give these funds a proper and legal appearance, which involves concealing their origins and their owner. Illegally acquired money can be the result of arms, drugs or human trafficking or other illegal activities.

The following criteria should make you wonder about potential money laundering:

- Requests for payment in cash
- Unusual payment terms
- Splitting payment into multiple transactions
- Transactions involving cash flows towards or from countries or territories known to be tax havens.
- Transfers of funds to or for third parties unrelated to the transactions at stake
- Reluctance by the third party to provide the information requested
- Use of multiple foreign bank accounts for no apparent reason

### What is Biocair doing in this area?

Biocair implements policies to reasonably know who we are working with and identify risky transactions. This allows us to avoid being used as a vehicle for money laundering.

### Examples of the right things to do



- All employees should conduct thorough due diligence on new clients, suppliers, and business partners to verify their identity and business legitimacy, ensuring that they are not involved in money laundering activities.
- All employees should report immediately to Biocair’s compliance or legal team if they encounter any transactions that seem unusual or suspicious (such as unusual payment terms, or transfers involving high-risk countries, multiple transfers from different accounts).
- All employees must comply with the Biocair Anti-Money Laundering Standard designed to prevent money laundering.
- All employees should maintain accurate records of all transactions and ensure that all required documentation (such as invoices, contracts, and payment receipts) is complete and available for review.
- All employees should ensure that any transactions involving third parties are legitimate and that the parties involved have clear and transparent connections to the business at hand.
- All employees should closely monitor any transactions that involve high-risk countries, large amounts of money, or complex payment structures, ensuring compliance with regulatory requirements and internal controls.
- All employees should complete mandatory training on anti-money laundering (AML).

- All employees should seek advice from Biocair's Local Embargo Compliance Officer (LECO) or Legal to ensure that they are taking the appropriate action. If they are unsure whether a transaction or business relationship is suspicious.
- All employees should report any instances of non-compliance or unethical behavior through Biocair's whistleblowing platform or to the appropriate internal authorities.

### Examples of the wrong things to do



- No employee should neglect or bypass performing thorough background checks on new clients, suppliers, or business partners.
- No employee should ignore transactions that appear unusual or suspicious, such as those involving unusual payment terms, transfers to or from high-risk countries, or multiple payments from different sources without clear explanations.
- No employee should ever knowingly engage in, facilitate, or ignore transactions involving dirty money or illicit funds, especially when aware that the funds have been illegally obtained.
- No employee should proceed with transactions involving third parties who have not been verified or approved by Biocair's compliance team.
- No employee should accept transactions involving cash flows towards or from countries known to be non-cooperative jurisdictions for tax purposes.



For more information on ESG SharePoint

- BIOCAIR ANTI MONEY LAUNDERING (AML) STANDARD

## 3.10 Keep accurate and detailed books and records

### What is it about?

Company books and records allow the tracing of its assets, liabilities, income, expenses and business transactions. They shall be kept comprehensively and accurately.

### What is Biocair doing in this area?

At Biocair, we ensure that our corporate books and records accurately and fairly reflect our assets and liabilities, as well as our financial, legal, and operational needs.

All books and records are supported by internal documents (such as employment contracts), or external documents (such as sub-contracts or invoices), that accurately show our assets and liabilities. Biocair requires all parties to act fairly and honestly in ensuring that these documents are accurate, complete, reliable, and secure.

At Biocair, we apply all applicable laws and international accounting standards. In addition, we have implemented a system of internal controls to prevent and identify frauds.

## Examples of the right things to do

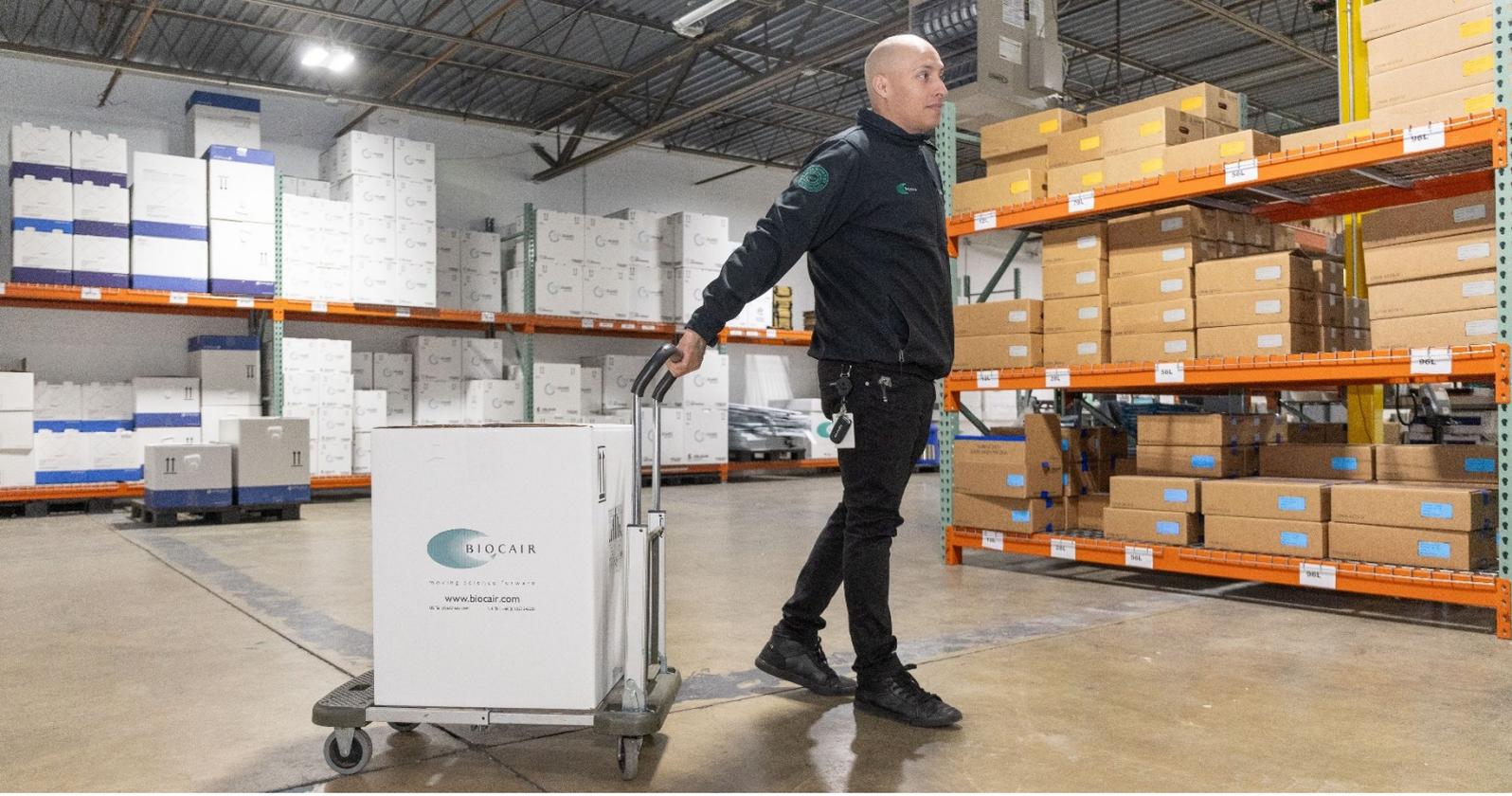


- All employees should ensure that all financial records, including transactions, invoices, and receipts, are accurately recorded and supported by appropriate documentation (e.g., contracts, delivery notes).
- All employees must follow Biocair's internal policies and applicable laws, including local and international accounting standards, when maintaining records.
- All employees should record all business transactions transparently, ensuring that there is a clear, accurate, and up-to-date reflection of the company's financial position and operations.
- All employees must ensure that all financial records are backed by proper supporting documents, such as contracts, purchase orders, and receipts, to validate transactions.
- All employees should promptly report any discrepancies or concerns about the accuracy of records or financial transactions to their manager or the Biocair Ethics Officer for review.
- All employees should handle sensitive financial records securely and ensure that confidential information is protected from unauthorized access or misuse.
- All employees should periodically review and update records to ensure they reflect current business activities and comply with the latest financial regulations.
- All employees should fully cooperate with internal and external auditors, providing any required documents and information in a timely manner to facilitate thorough audits.
- All employees should seek guidance from the Finance team if they are unsure about the correct way to record a transaction or maintain documentation.
- All employees should maintain and dispose of Biocair records in accordance with records management and the Biocair Data Retention Standard.
- All relevant employees should ensure that the books and records of Biocair are prepared in accordance with applicable accounting standards and frameworks.

## Examples of the wrong things to do



- No employee should alter financial records, including transactions, invoices, and receipts, or intentionally omit any supporting documents (e.g., contracts, delivery notes).
- No employee should conceal or falsify any business transactions, leading to inaccurate or incomplete reflection of Biocair's financial status and operations.
- No employee should arbitrarily destroy or improperly store Biocair's records, violating data retention standards.
- No employee should conceal or destroy documents or records that are subject to an investigation or may be used in official proceedings or in a general way that may be useful for the conduct of financial operations.



## 4. Protection of the Organization's Resources

### 4.1 Preserve our resources and assets

#### Use resources and assets responsibly

##### What is it about?

To carry out its duties, Biocair provides its Employees with various tools such as computers, telephones, vehicles, and intangible resources such as network bandwidth. They shall be used responsibly.

##### What is Biocair doing in this area?

In general, Biocair tolerates the use of these tools for personal purposes, if this is conducted in an appropriate manner and without prejudice for Biocair.

##### Examples of the right things to do



- All employees should primarily use Biocair's resources (such as computers, phones, and vehicles) for work-related activities, ensuring that personal use is minimal and does not interfere with job responsibilities.
- All employees should take reasonable care of Biocair's physical assets, ensuring they are used efficiently and properly maintained to avoid unnecessary wear and tear, recognizing the risks of theft, loss, waste, misappropriation, unauthorized access etc.
- All employees should avoid overuse or misuse of Biocair network bandwidth for personal activities, ensuring work tasks remain the priority.
- All employees should be mindful of their use of office supplies, energy, and other resources, avoiding wasteful practices and promoting sustainability within Biocair.
- All employees should use Biocair resources responsibly, ensuring that confidential information is

protected, and company data is not compromised, especially when using computers, mobile devices, or storage systems.

- All employees should store only business-related information on computers or other devices provided by Biocair, as well as on approved cloud storage services such as BOX, OneDrive, or SharePoint, as additional security measures have been implemented on these systems.
- All employees should immediately report any misuse of Biocair resources or damage to assets to their manager or the appropriate department to address the issue promptly.
- All employees should ensure that their use of company resources complies with all relevant legal, ethical, and regulatory standards, avoiding any activities that could cause legal or reputational harm to Biocair.
- All employees should use the Biocair email system for business purposes only.
- All employees should employ strong passwords to access Biocair systems.
- All employees should complete all mandatory cyber-awareness training and report phishing attempts to the Information Security Analyst immediately.

### Examples of the wrong things to do



- No employee should overuse Biocair's network bandwidth for personal activities, causing delays in work tasks or impacting business operations.
- No employee should neglect information security when using Biocair resources, which could lead to a leak of Biocair confidential information or unauthorized access to data.
- No employee should visit an inappropriate website with the equipment provided by Biocair, even if there is no filtering software blocking access to the site
- No employee should commit any offence using the equipment provided by Biocair, even in the context of their employment (e.g. speeding in a Biocair vehicle)
- No employee should ever download unauthorized software, or use VPN software other than that provided by Biocair
- No employee should use personal encrypted social media apps such as WhatsApp, for business purposes.
- No employee should connect personal devices to corporate Wi-Fi



For more information on ESG SharePoint

- [BIOCAIR IT ACCEPTABLE USE POLICY](#)

## Protect our confidential information

### What is it about?

Confidential information is information that is collected in the context of your duties for Biocair and that is not publicly available. This may include information about our team members, Business Partners, corporate strategy, etc.

Confidential information may be “privileged” when it relates to a publicly listed company and the disclosure of the information might have an impact on the stock price.

Protecting this data means processing it confidentially and ensuring that it is not disclosed to any unauthorized third party.

### What is Biocair doing in this area?

Biocair takes all necessary measures to protect its confidential information:

- Biocair asks its Employees and Business Partners not to disclose information unless there is a legitimate business necessity to do so.
- Biocair asks its Employees to be careful when discussing, reading, or disposing of documents containing confidential information in public places.
- Biocair includes confidentiality clauses in its contracts.
- Biocair has technical procedures in place to prevent any intrusion into our information systems.
- Biocair has implemented an authorization system for access to certain data by authorized persons.
- Biocair has a response system in the event of a suspected cyberattack.

The vigilance required when handling confidential information does not restrict communications between Biocair team members or communications authorized or required by law.

### Examples of the right things to do



- All employees should ensure that all confidential information, including client data, business plans, financial records, and intellectual property, is stored securely and accessible only to authorized personnel.
- All employees should use strong, unique passwords to protect company systems and accounts, and change passwords regularly to reduce the risk of unauthorized access.
- All employees should encrypt sensitive data when transmitting it over email, online platforms, or any external communication channels.
- All employees should avoid discussing confidential information in public places or with unauthorized individuals, ensuring that sensitive data is shared only with those who have a legitimate need to know.
- All employees should lock their computers, phones, or other devices when not in use to prevent unauthorized access to sensitive information (even when leaving their desk for a short period of time)
- All employees should ensure that physical documents containing confidential information are stored in secure areas, such as locked cabinets or rooms with restricted access.
- All employees should avoid sharing confidential information through personal communication channels, such as personal emails or messaging apps.

- All employees should promptly report any potential or actual breaches of confidentiality to their manager or the info sec team to mitigate risks and prevent further exposure.
- All employees should follow Biocair's Data Protection Standard to ensure that personal and company data is managed responsibly and in compliance with legal requirements.
- All employees should ensure that any confidential documents or digital files are securely deleted when no longer needed, in accordance with Biocair's Data Retention and Disposal Standard.
- All employees should protect the confidentiality of sensitive information (restricted, confidential or secret), by limiting access to it.
- All employees should report any suspected cyberattacks or computer breaches they become aware of to the Information Security Analyst at [infosec@biocair.com](mailto:infosec@biocair.com)

### Examples of the wrong things to do



- No employee should store confidential information (such as client data, business plans, financial records, and intellectual property) in unsecured locations, on personal computers or allow unauthorized individuals to access this information.
- No employee should share passwords for protecting company systems and accounts.
- No employee should discuss sensitive information (restricted, confidential or secret), or read documents that contain such information in public places (lift, hotels, transportation, restaurants, etc.)



For more information on ESG SharePoint

- BIOCAIR DATA RETENTION & DISPOSAL STANDARD
- BIOCAIR DATA PROTECTION STANDARD
- BIOCAIR EMPLOYEE PRIVACY POLICY
- BIOCAIR ENCRYPTION AND CRYPTOGRAPHIC POLICY

## 4.2 Using social media properly

### What is it about?

Social media should be understood broadly and covers:

- Social networks (Facebook, LinkedIn, Instagram, TikTok, etc.)
- Video and photo-sharing websites (Flickr, YouTube, etc.)
- Microblogging sites (X, Weibo, Snapchat, etc.)
- Blogs (professional and personal)
- Forums and discussions platforms (Yahoo! Groups, Google Groups, etc.)
- Collaborative publishing platforms (Wikipedia, Google Docs, etc.)

### What is Biocair doing in this area?

Using social media is a great way to communicate our enthusiasm and values to our customers. However, posts on social media can also affect the reputation of Biocair and/or each Employee.

Geopost has a proactive policy on social networks and manages the company's social accounts daily, in a spirit of coordination between its subsidiaries and parent company. Biocair also assists Employees who want to set up their own accounts, particularly on LinkedIn or Twitter, to, among other things, inform them about

risks and good practices.

### Examples of the right things to do



- All employees should always ensure that their social media posts reflect Biocair's values and professionalism, especially when discussing work-related topics or representing the company online.
- All employees should never share confidential or proprietary information about Biocair, its clients, or business partners on social media.
- All employees should follow Biocair's social media Policy.
- All employees should respect the privacy of colleagues, clients, and business partners by not sharing personal information or images without consent.
- All employees should keep their professional and personal social media accounts separate, ensuring that personal views and posts do not overlap with Biocair's brand.
- All employees should avoid posting any content that could be perceived as inappropriate, offensive, or controversial, as it may negatively impact both their personal reputation and Biocair's brand.
- All employees should report any social media activities that violate company policy or create risks for Biocair's reputation to the Marketing team immediately.

### Examples of the wrong things to do



- No employees should violate Biocair's social media policy by posting content unrelated to the company or inconsistent with the company's image.
- No employee should engage in negative or confrontational discussions about the company or industry, publicly expressing unfavorable opinions or attacking others.
- No employee should disclose confidential information in social media postings made as part of business activity without prior approval.
- No employee should comment on or criticize competitors and/or their products and services.
- No employee should use their business e-mail address to connect to social media for personal use
- No employee should post personal publications which may be perceived as issued on behalf of Biocair.
- No employee should indicate on social networks holding a position not in line with the position held within Biocair.



For more information on ESG SharePoint

- BIOCAIR IT ACCEPTABLE USE POLICY

## Annex 1 — Glossary

Business partner	means any supplier, subcontractor, partner or customer, intermediary, and more generally, any third party to Biocair with whom it intends to create or has already created a business relationship
Employee	means any person working for and being paid directly by Biocair, regardless of the term of their contract (indefinite or fixed term), including people under training or apprenticeship contracts
Ethics Officer	means any person in charge of ensuring compliance with the ethics framework within Biocair
Executive	means any legal representative, the Biocair Chief Executive Officer (CEO) or any member of the Executive Leadership Team (ELT) or similar body
Geopost	means the group composed of GeoPost SA and all its BUs
Gift	means any financial or moral, material or immaterial benefit offered or received in the context of a past, present and/or certain or potential future business relationship. E.g. customer and supplier gifts, boxes of chocolates, branded gifts, discounts, rebates, services, transport upgrades,
Hospitality	means any tangible or intangible benefit, any form of hospitality (meals, entertainment, accommodation, etc.) offered or received in the context of a past, present and/or potential future business relationship. E.g. Meals in restaurant; Inviting a client to lunch; Invitation to a sporting or cultural event; Invitation to a concert by a service provider; Trade show invitation from a supplier; Invitation by a client to a seminar to speak.
People Team	means the department responsible for human resources within Biocair, which is known as the People Team
Intermediary	means any legal entity or individual acting for and/or on behalf of Geopost SA and/or Biocair. E.g. consultants, individuals or legal entities participating in commercial negotiations to enable or facilitate the conclusion of one or more contracts.
Legal Department	means the department responsible for legal matters within GeoPost SA or Biocair
Manager	means any person to whom Employees report within Biocair
Personal Data	means any information relating to an identified or identifiable individual, directly or indirectly
Whistleblowing system	means any technical system implemented to send an alert within Geopost SA and/or Biocair

