



Biocartis Code of Conduct

21 February 2023

1 Introduction

At Biocartis, our **vision** is to enable universal access to personalized medicine for patients around the world. Our **mission** is to make molecular testing convenient, fast and suitable for any lab. To achieve our vision, mission and strategic priorities, we have identified **seven core competencies** for our people:

- Cross-functional teamwork - working as a team across departments brings the best results.
- Customer-centricity: focusing on the needs of the user always sets the right course.
- Accountability: take ownership for your words, actions and behavior.
- Result-driven: meet targets and be solution-minded, even in challenging projects.
- Quality mindset: continuously improve and practice a high-quality standard in everyday work.
- Innovation and continuous improvement: challenge the status quo to bring novel solutions with speed and efficiency.
- Adaptability to change: create positive impact for all of our stakeholders in a rapidly changing environment.

Every day we work hard to make our vision and mission a reality. While doing so, it is important that we never forget that we are part of a broader environment with multiple stakeholders, and that the way in which we do things is important. That is where our Code of Conduct comes in.

2 Scope and Aim of this Code of Conduct

This Code of Conduct applies to all employees, directors and officers of the Biocartis group, as well as to any persons providing services to the Biocartis group as self-employed persons (all these persons are hereafter referred to as "**you**").

Our Code of Conduct is intended to assist you in making ethical decisions which comply with applicable laws, regulations and codes when conducting Biocartis' business or when interacting with colleagues. You must adhere to this Code of Conduct and **ensure compliance** with the principles set out herein. However, this Code of Conduct does not aim to be exhaustive and does not contain a detailed description of all applicable laws, regulations, policies, guidelines and procedures. This Code of Conduct rather aims to provide **minimum standards and guidance** to you. It is not intended to reduce or limit any other contractual or legal obligations that might apply. Remember that you are always expected to exercise sound, ethical and good faith judgement.

Every one of you is strongly encouraged to **speak up**, protect Biocartis' values and reputation, and report any breaches of laws or this Code of Conduct. To this end, we have established a **whistleblowing** procedure (see BC-021476).

3 Our People

Our people are our most important asset, and we want to create an environment in which our people can thrive. Our people's skills, abilities, knowledge, and experience are invaluable in securing Biocartis' success.

3.1 Non-Discrimination, Respect, Diversity and Inclusiveness

We have an inclusive company culture where every employee is valued, heard, and empowered as an individual belonging to a community that is passionate about bringing rapid and easy molecular diagnostic solutions to patients across the world. We do not tolerate any form of harassment or discrimination based on, among others, race, sex, age, nationality, ethnic background, skin color, political persuasion, sexual



orientation, religious conviction, social background, or disability. We value the diversity of our workforce as it brings diverse perspectives and strong teamwork to deliver better solutions to our customers across the globe, and we strive to create a climate of well-being for all of you. You must act in a professional manner and treat your colleagues, as well as business partners and other third parties, with dignity, fairness and mutual respect.

3.2 Health & Safety

We aim to provide a safe and healthy work environment for our employees, our contractors and our visitors. We keep safety top of mind by systematically identifying and managing health and safety risks in our activities, putting appropriate systems and processes in place, and complying with all applicable workplace health and safety laws and regulations. We foster and encourage a culture of safe behavior. You must abide by all applicable workplace health and safety laws and regulations, without exception.

3.3 Freedom of Opinion, Speech and Association

Biocartis respects your right to choose to join a union, and we aim to engage in constructive dialogue with our employees and their representatives. Biocartis recognizes that you are entitled to freedom of opinion, expression and speech, provided that these do not interfere with other employees' ability to fulfill their job responsibilities and do not conflict with applicable laws or confidentiality undertakings. You must comply with all provisions of the agreements governing your relationship with Biocartis including, as the case may be, the Biocartis work regulations.

4 Our Society

At Biocartis, we understand that we are all part of something bigger. We all have an impact on other people's lives, be it by interacting with them directly or indirectly as a result of the actions of the other actors in our value chain. We want that impact to be positive.

4.1 Compliance with Core Human Rights Principles

Biocartis complies with the core human rights principles, including but not limited to the principles set out in the conventions of the International Labor Organization, regarding the freedom of association and protection of the right to organize, the abolition of forced labor and modern slavery, minimum age, equal remuneration and non-discrimination. You are expected to act at all times in a way that ensures compliance with these core principles. We strive to ensure that the activities within our sphere of influence do not negatively impact fundamental human rights, both directly and through the Biocartis business relations. You are expected to act at all times in a way that ensures compliance with these core principles.

4.2 Sustainability and Environment

We strive to make efficient use of natural resources and to minimize the environmental impact of our activities. All departments within Biocartis review each aspect of our activities to develop a complete understanding of their environmental impact. Based on this understanding, we pursue sustainable initiatives such as greenhouse gases reduction, waste reductions and supporting recycling. We have processes in place to comply with all applicable environmental laws and regulations.

4.3 Our value chain

The impact we have does not only result from our own operations, but also from the activities of our various suppliers, distributors and other partners. We understand that each of them is subject to different laws and regulations, and will define its own priorities to contribute to a better world. However, we do expect from our partners that they will comply with certain minimum standards. To this end, we aim to establish a code of conduct which will apply to our partners, and each of you is expected to ensure compliance with such code to ensure that these minimum standards are guaranteed throughout our value chain.



5 Our Customers

Our customers are front and central in our strategy. We aim to sell high-quality products which fulfill our customers' needs, and to compete fiercely for their business in a way that is both legal and ethical. We want to interact with our customers in an honest and respectful manner.

5.1 Product Quality and Safety

Every day we focus on product quality, i.e. delivering products for customers and patients that are safe, effective and in compliance with regulatory requirements. We do so through a suitable (tailored for our business), adequate (in compliance with regulatory requirements), and effective (delivering as intended) Quality Management. Your adherence to applicable policies, procedures and work instructions and your engagement to continuously improve these are essential.

You must uphold the highest degree of integrity when performing research activities, developing, manufacturing and selling products. In particular, you must abide by the principles of reliability (in ensuring the quality of the research), honesty (in development and communicating about results in a fair and unbiased way), and accountability (in following applicable policies, procedures and work instructions).

5.2 Fair Competition

You must ensure that you deal with Biocartis' competitors, customers, suppliers and other business partners in an ethical and lawful manner at all times. Biocartis recognizes the importance of competition in the market. You must comply with all applicable antitrust and unfair competition laws. Moreover, you must also refrain from using illegal or unethical behavior to gather competitive information, steal or otherwise unlawfully obtain proprietary or confidential information of third parties, or take unfair advantage of another person in any business dealings with third parties.

5.3 Confidentiality and Personal Data Protection

You must treat all Biocartis' non-public information as strictly confidential, preserve the confidentiality of such information and not disclose it to anyone within or outside Biocartis, except in certain limited cases such as when disclosure is made on a need-to-know basis, authorized by Biocartis and governed by a non-disclosure agreement, or in case disclosure is required by applicable law or court order. If confidential information is obtained from third parties, you must comply with the obligations under which such information has been obtained and may only use such information for the purposes for which the information has been obtained. Reference is made to the Biocartis Confidentiality Policy (see BC-004180).

You must also comply with all applicable personal data protection legislation. If you come into contact with personal data and are processing this data on behalf of Biocartis, you should do so relying on the data protection principles of fairness, lawfulness and transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity and confidentiality.

5.4 No Bribery, Fraud, Corruption or Breach of Export Controls or Sanctions Legislation

You may never commit any form of bribery, make any other improper payments or transfers or obtain any improper receipts. You may not offer, give, solicit or receive any money or value item for the purpose of obtaining, retaining or directing business or a favorable treatment. You must also at all times comply with all applicable anti-corruption legislation, and are not allowed to commit or participate in any form of fraud, money laundering or breach of any export controls or sanctions legislation, or induce anyone else to do so.

5.5 Ethical Marketing Practices

Biocartis markets and sells its products in compliance with all applicable rules and regulations, and in line with high ethical standards. Reference is made to the Biocartis Code of IVD Compliance (BC-004188).



6 Our Investors

As a company whose shares are listed on the regulated market of Euronext Brussels, we comply with strict laws and regulations, among others with respect to disclosure obligations to the market and the prohibition of insider dealing. In everything we do, we are committed to protect Biocartis' reputation.

6.1 Protection and Proper Use of Biocartis' Property and Assets

You have a responsibility to protect Biocartis' assets entrusted to you, and Biocartis' property and assets in general, from any loss, damage, misuse or theft. You may only use Biocartis' property and assets in line with the relevant Biocartis policies and procedures, such as the Biocartis IT policies.

6.2 Financial Integrity and Accuracy of Records

The integrity, reliability and accuracy in all material respects of Biocartis' books, records and financial statements is key to our success and the trust from our investors, regulators and other third parties. Biocartis provides timely, accurate and complete financial information to its shareholders and financial markets, and maintains effective controls over financial reporting to ensure a complete and accurate record of its financial transactions. You are also not allowed to create any false or artificial documentation, information or book entry.

6.3 External Communication

Biocartis values open and transparent communication with all internal and external stakeholders, within the boundaries of applicable laws, regulations and contractual arrangements. To this end, we have drawn up, and you must abide by, the provisions of the Biocartis Communications Policy (which can be found on our intranet) for all internal and external communication. Biocartis will communicate the information necessary to ensure the transparency, integrity and proper function of the market, and will ensure that such information is accurate and correct.

6.4 Insider Dealing

You must at all times comply with applicable market abuse laws, which provide that you may not engage or attempt to engage in insider dealing (i.e., using inside information relating to Biocartis to acquire or dispose of financial instruments of Biocartis), recommend that another person engage in insider dealing or induce another person to engage in insider dealing, or unlawfully disclose inside information. Reference is made to the Biocartis Dealing Code (see BC-007527).

6.5 Conflicts of interests

All your decisions and actions must be made or taken in the best interests of Biocartis. A conflict of interests may arise in any situation where your personal or other interests interfere with the interests of Biocartis, for example if you or your family members have an outside interest or obligation that makes it difficult for you to perform your responsibilities objectively and in Biocartis' best interests.

Without prejudice to any laws governing conflicts of interests and the provisions of the Biocartis Corporate Governance Charter (if applicable), you must promptly disclose any actual or potential conflict of interests to your manager, who may escalate the matter to Biocartis' executive management, who may in turn escalate to Biocartis' Board of Directors or any committee thereof, if appropriate.

Moreover, you have a duty towards Biocartis to advance Biocartis' legitimate business interests whenever possible. This entails that you may not compete with Biocartis, and shall not pursue – outside Biocartis - any opportunity discovered through Biocartis or as a result of your position within Biocartis, unless Biocartis has been given the possibility to pursue the opportunity but has chosen not to do so.



7 Compliance with this Code of Conduct

7.1 Compliance by Staff

You were provided with a copy of this Code of Conduct at the start of your contractual relationship with Biocartis, and will be required to review and acknowledge this Code of Conduct every two years.

You must at all times act in compliance with the text and spirit of this Code of Conduct. We however understand that the provisions of this Code of Conduct can be of a high-level nature, and therefore request all of you to proactively inform yourself of any applicable laws, regulations, policies, guidelines and procedures which apply to you. You are also encouraged to seek internal guidance from our compliance officer (complianceofficer@biocartis.com) or other internal teams in case of uncertainties or questions with respect to this Code of Conduct.

7.2 Breaches of this Code of Conduct - Whistleblowing Procedure

You are strongly encouraged to report any breaches of this Code of Conduct using our internal reporting lines. All relevant information on this can be found in the Biocartis Whistleblowing Procedure (see BC-021476).

7.3 Monitoring Compliance with this Code of Conduct

Biocartis' executive management and, as far as the day-to-day operation and interpretation of this Code of Conduct is concerned, the Biocartis Compliance Officer will be responsible for taking reasonable steps to monitor compliance with this Code of Conduct. They will always act under the supervision of the Biocartis Board of Directors. Biocartis' executive management is also responsible, if applicable, to impose and enforce appropriate disciplinary measures for breaches of this Code of Conduct.