



RULES OF ETHICS AND GOOD PROFESSIONAL CONDUCT FOR GENERIX GROUP

Preamble

Dear Colleagues,

Generix Group is a major player in an industry that has become one of the most competitive and responsive in the world. If, with this evolution, our business management becomes richer, it also becomes more complex and demanding.

More than ever, we must maintain our integrity in order to guarantee our stakeholders that our actions are legally and ethically irreproachable.

In this way, we will continue to inspire respect and trust, and guarantee our most cherished asset: our customers' loyalty.

So, let's take the time to read this "Rules of Ethics and good professional conduct" and make sure we implement it accurately.

Jean-Charles DECONNINCK
Chairman of the Board Generix Group
May 13, 2021

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I. WHY THESE RULES?

Generix Group's Rules of Ethics and good professional conduct define, explain and formalize the rules of conduct and behaviour, as well as the principles of action that we expect from ourselves and that all Generix Group stakeholders require from us.

It expresses our respect of laws and people, as well as our responsibilities towards our partners, customers and other Group stakeholders. It is the reference document for our ethical culture.

Following and respecting our rules is mandatory for Generix Group to be compliant with laws and regulations, as well as with the Group's internal rules, procedures and policies.

This document is not exhaustive and due to the constant need to adjust our practices, the content of this document will be updated as necessary.

II. THE ROLES OF EVERYONE

» **The co-worker:** refers to each employee, manager and director of the Group, since they all contribute to the life of Generix Group.

Each employee undertakes to abide by the rules of ethical conduct and the ethical principles of this document.

Employees who market products or work in areas subject to specific regulations (such as public procurement, environment, exports, taxes or customs) must also comply with additional specific rules.

» **The manager:** Like any other co-worker, the manager is committed to abide by the ethical rules of conduct and the ethical principles of this document.

In addition, the manager must set an example and preserve, promote and implement our Rules of Ethics and good professional conduct in their teams.

The manager helps his/her teams to execute and act in accordance with these Rules.

» **The Group Human Resources Department:** prepares and coordinates the updating of the Rules, ensures that they are duly implemented by employees and takes the relevant decisions.

» **The Group Legal Department:** validates the Rules and their updates, assists employees and managers in implementing the Rules.

» **The Ethics Committee:** composed of General Management, the Human Resources Department and the Legal Department, decides on cases of non-compliance with the Rules and takes any decision and corrective action to redress the situation. The Ethics Committee is appointed by the CEO and reports to the Supervisory Board and Audit Committee.

I. GENERIX, A CORPORATION

1. THAT LOOKS AFTER THE RIGHTS OF ITS EMPLOYEES

1.1 RESPECT OF HEALTH AND SAFETY OF EMPLOYEES

- » Generix Group makes every effort to ensure that its employees enjoy pleasant and safe working conditions.
- » Each employee commits to comply with all the Group's Health and Safety instructions and rules, as well as those of the customers with whom he/she is likely to work.
- » Each employee must immediately inform the Health and Safety Departments or Managers of any behaviour or situation that could be dangerous.

For example, managers commit to respect the rest periods, authorized absences or sick-leave absences of their teams.

1.2 FIGHT AGAINST DISCRIMINATION AND HARASSMENT

- » Each co-worker is entitled to a respectful environment. Therefore, the Group does not tolerate any discriminatory behaviour or harassment practices.

Each country may have its own definition of harassment. Generix Group condemns any act or gesture aimed at morally hurting, offending and any form of humiliation or intimidation. Harassment is not a question of hierarchical reporting, it can also occur between colleagues.

- » Generix Group ensures that the employee who considers himself/herself a victim and the accused employee are protected against any measure or behaviour that could be prejudicial to them until the procedure has been completed.
- » Generix Group treats the case with the strictest confidentiality.

Generix Group promotes professional gender equality between women and men and diversity in all the Group's entities.

1.3 PROTECTION OF COWORKERS PRIVACY

- » Generix Group or third parties authorized by Generix Group collect and follow-up personal information such as compensation (external service providers) or medical data (complementary health insurance manager) for example.
- » Access to this personal information is strictly limited to those who need it in the execution of their duties. It is only communicated to third parties with the consent of the person concerned (except for legal and operational requirements such as replies to be provided in the context of a legal procedure).

Generix Group applies local laws and regulations and in particular the European General Data Protection Regulation (GDPR) in the concerned subsidiaries.

- » If a co-worker considers certain data, objects, messages and information to be personal, he/she must under no circumstances store them, in particular on Generix Group premises or information systems to which his/her management or colleagues may have access.
- » It is the responsibility of co-workers having access to personal information to ensure that this information is not disclosed or used in violation of Generix Group rules or practices.

2. GENERIX, A CORPORATION THAT PROTECTS ITS ASSETS AND INFORMATION

Generix Group owns assets that are instrumental to its competitiveness and success and that must be used only within the scope of Generix Group's business.

What are they?

The assets belonging to Generix Group are tangible and intangible assets such as installations, systems, equipment, payment cards, office supplies, vehicles, furniture, IT and telephone equipment.

It is each co-worker's responsibility to respect and protect the company's property entrusted to him/her and to contribute to the protection of the company's assets.

2.1 INTERNAL INFORMATION SYSTEMS AT GENERIX GROUP

- » Internal communication tools (e.g., Teams, Internet) and information processing are essential for collaboration within the company as well as for conducting Generix Group business.
- » Like other Generix Group assets, this equipment and the information it provides must be used by employees for the sole purpose of conducting Generix Group business.
- » It is the responsibility of each co-worker to ensure the legitimacy of the use he/she makes of the equipment.

» Generix Group provides all its co-workers with mandatory training on the security of information systems.

2.2 INFORMATION BELONGING TO GENERIX GROUP

» Some information is confidential: for example, financial information, strategy, pre-launch projects, and organizational information.

» The obligation not to use or disclose this information applies to all co-workers, whether they are the source of the information or not.

» Within the scope of strictly identified projects, certain co-workers may however need to exchange confidential information for professional purposes. In this case, each of the concerned co-workers must first have signed a Confidentiality Agreement or Non-Disclosure Agreement (NDA) issued by the Legal Department.

What is an NDA? It is a contract in which the parties agree to keep a certain amount of information confidential for a certain period of time.

» The co-worker undertakes to be vigilant and to ensure that he/she never discloses, even inadvertently, information held by Generix Group.

What is confidential information? It can be technical, financial, strategic, product (software), service, research, present or future information, commercial or marketing forecasts or plans, HR information. Example: personal information, organizational changes...

Why?

Unauthorized disclosure of the existence of a product that has not been announced by Generix Group may harm the company by giving its competitors more time to offer a similar product.

The disclosure of a change in the organization may, for example, have unwanted impacts on shareholders, partners or employees and thus jeopardize Generix Group's strategy.

Best practices:

Never discuss with unauthorized persons any information that Generix Group considers confidential or that has not been made public by Generix Group.

Never give this type of information, even to other Generix Group employees authorized to receive it, especially in the presence of unauthorized persons. For example, during a commercial event or in a public place such as on board an aircraft, or when using a cell phone or any electronic display system.

Never inform or comment on this information with family or friends as they could innocently or simply by inadvertence transmit it to a third party.

2.3 USE OF GENERIX GROUP TRADEMARKS AND INTELLECTUAL PROPERTY

» Trademarks:

Generix Group owns trademarks - word, name, acronym or logo - that are used to identify or distinguish its services or products. For example, the Generix Group logo (Collaborate > Accelerate).

Generix Group trademarks must be recognized or used properly. They must be spelled and executed in accordance with the registration made with the competent institutions. The Communication Department can be consulted to ensure the correct use of the Generix Group trademark.

» Intellectual property

The co-worker grants Generix Group all rights to any ideas, inventions, writings or computer programs that he/she may develop, if they fall within the company's present or future field of activity or if they are the result of work that has been requested of him/her.

» Solutions source codes

Generix Group regularly registers and updates its solutions source codes with the approved organizations.

2.4 A CO-WORKER LEAVING GENERIX GROUP

In the event of a departure from the company for any reason whatsoever, the co-worker shall return all property belonging to Generix Group in his possession, including documents and media containing information specific to Generix Group. The co-worker shall not keep any copy of this information.

Generix Group applies procedures that guarantee the termination of the leaving co-worker's access to tools and files.

After his/her departure, the intangible assets created by the co-worker while in post remain the property of Generix Group.

2.5 RELIABILITY AND ACCURACY OF THE INFORMATION PROVIDED BY THE CO-WORKER

- » All co-workers produce, record, manage or transmit information internally or externally. For example: a salesperson transmits orders, an accountant records income and expenses, etc.
- » Communicating false information, whether within Generix Group or to third parties (e.g., auditors, persons and organizations outside the company) is strictly forbidden.
- » Each co-worker is careful to the truthfulness of the statements he/she transmits and undertakes not to make any false or misleading statement.

3. GENERIX, A CORPORATION THAT RESPECTS ITS COMPETITORS

Generix Group prohibits employees from disparaging the competition or making false or misleading statements about the competitors or their products and services.

3.1 RESPECT OF COMPETITORS' SALES CONTRACTS

When a competitor has already received a firm order from a customer (which the law considers as a contract) for one of its products or services, Generix Group strictly prohibits offering products and services before the competitor has installed its own or the order has been cancelled.

3.2 CONTACTS WITH COMPETITORS

Where established procedures are enforced, many of these contacts are perfectly acceptable. This includes contacts regarding sales to or purchases from other IT companies, participation in pre-approved joint bids, trade shows or events, and meetings of standards committees and trade associations.

Generix Group prohibits disclosure of any information relating to pricing policies, contractual terms, costs, product marketing plans, market studies, production capacities and more generally any information that is confidential or belongs to Generix Group.

Best practice: If, during a meeting, a competitor addresses any of the above issues, even superficially, the co-worker should inform the competitor that his/her comments are inappropriate and should stop the conversation.

3.3 COMPLIANCE WITH LAWS PROTECTING FREE COMPETITION

- » Most of the countries in which we operate have business laws and regulations designed to protect competition. The Group is committed to abide by the laws and regulations that apply in the countries where it operates.
- » Generix Group respects the laws that protect free competition.
- » Generix Group refuses any agreement with competitors that would allow it to sell its products at the same price, to share markets or customers or that would constitute an abuse of dominant position.

3.4 INFORMATION ON COMPETITORS

- » Generix Group collects information on its competitors, using legitimate channels of information. This practice makes it possible to assess the advantages of its own products, services and marketing methods.
- » Generix Group prohibits the use of dishonest means to obtain business secrets or any other confidential information from a competitor. Illegal practices such as unauthorized intrusion, burglary, recording of conversations, bribery or theft are obviously reprehensible. The same goes for the hiring of competitor's employees for the sole purpose of obtaining confidential information.
- » Requesting the communication of confidential information from the employees of a competitor or a Generix Group customer is reprehensible.
- » Generix Group does not tolerate any illegal collection of information.

3.5 DISPARAGEMENT BY COMPETITORS

- » If a co-worker is informed of an act of disparagement against Generix Group (targeting its solutions or strategy, for example), he/she informs the Legal Department, which will take all necessary actions to put an end to the acts of unfair competition.

4. GENERIX, A CORPORATION THAT RESPECTS ITS CUSTOMERS

- » Generix Group acts in the interest of its customers and commits not to provide any technical or other advice that would be contrary to their interests.
- » Generix Group complies with the legislation applicable in its customers' countries.
- » Generix Group guarantees to its customers the respect of the regulations concerning the protection of personal data.

4.1 BEHAVIORS WHEN VISITING A CUSTOMER

- » Every employee represents Generix Group and must convey an exemplary image.
- » Every employee undertakes to behave in an irreproachable manner, for example courteously and respectfully towards any interlocutor and in particular towards and in the presence of a customer.
- » Generix Group does not tolerate any inappropriate remarks in front of the customer, whether it is for example to denigrate Generix Group or the work done by one of its colleagues.

4.2 PUBLIC PROCUREMENT

- » Government procurement regulations help public sector customers and their representatives obtain the products and services they are looking for at a competitive price. These regulations are widely variable and are often complex, so special attention must be paid to ensure compliance with local laws and regulations.
- » Each co-worker is committed to serving the public interest within the scope of the law and to complying with any regulations applicable to public procurement in the country concerned.
- » During a public procurement procedure, the co-worker is prohibited from attempting to unduly influence the customer's decisions, or to unduly obtain confidential information.

5. GENERIX, A DEMANDING CORPORATION IN ITS RELATIONS WITH ITS SUPPLIERS

- » Fairness and integrity govern the choice of a supplier and no special treatment is granted to any supplier regardless of the volume and cost of the purchase.
- » Generix Group puts its suppliers in competition to select the best ones. Prices and other information provided by suppliers are confidential. No co-worker is authorized to disclose or use this information outside Generix Group.

- » Generix Group has procedures to ensure that suppliers are irreproachable in terms of ethics, IT and financial security and that they undertake to respect them.
- » Generix Group ensures that its suppliers are respectful of the company in their behaviour and in the way they conduct their business.
- » Generix Group reserves the right to terminate the contractual business relation in case of non-suppliers' compliance with their commitments.

Prohibition of the principle of Reciprocity

The principle of Reciprocity consists in promising a potential supplier that the decision to purchase its products or services is subject to the condition that it agrees to purchase goods or services from Generix Group.

This does not mean that a Generix Group customer cannot be a Generix Group supplier or that Generix Group can never consider its other relationships with a supplier in its evaluation. It does mean that Generix Group's decision to deal with a supplier must be taken independently of that supplier's decision to purchase Generix Group's products and services.

6. GENERIX, A CORPORATION THAT PROTECTS RELATIONS WITH THIRD PARTIES

Generix Group has business relations with third parties that are instrumental to its development.

For any transaction, the specific nature of each business relation must be understood and controlled in order to act ethically.

Generix Group applies local laws and regulations on the processing of personal data and in particular the European General Data Protection Regulation (GDPR) in the subsidiaries concerned.

Generix Group ensures that its suppliers and service providers proceed in the same way.

6.1 PUBLIC OR POLITICAL PERSONALITIES

- » Generix Group encourages public personalities to visit its sites to better understand its activities and its views on issues of public interest.
- » Generix Group does not make any financial contribution or provide any support that could be considered as a direct or indirect contribution to political candidates or parties, including through intermediary structures (campaign committees, fundraising associations, etc.) or through the political involvement of its co-workers.
- » Generix Group formally prohibits any electoral campaign in Generix Group premises.

6.2 BUSINESS PARTNERS

Generix Group maintains business relationships with partners to sell its products or implement its solutions.

Co-workers in contact with these partners must ensure that they abide by the guidelines applicable to Generix Group's marketing and services and that they act in Generix Group's interest.

6.3 BUSINESS RELATIONS WITH THIRD PARTIES

Generix Group's activities are a focus of attention in particular for journalists, consultants or financial analysts.

No co-worker is authorized to enter contact with them or to answer their questions, in particular concerning Generix Group's activities, without being formally authorized to do so. Co-workers being approached shall first consult the Chief Financial Officer for financial aspects and the Marketing & Communication Director for journalists.

6.4 ACQUISITION AND USE OF INFORMATION FROM THIRD PARTIES

Generix Group is committed to protecting the personal information of third parties and therefore complies with local laws and regulations, in particular the European General Data Protection Regulation (GDPR) in the subsidiaries concerned.

Generix Group protects the privacy of its interlocutors - in particular via guidelines on the business use of e-mail - and only collects, uses and communicates personal information in strict compliance with these rules.

When sensitive information about other companies or individuals is to be used, co-workers will use it appropriately and make it available only to those co-workers of the Company who have a legitimate need to know it.

In presenting such information, the co-worker should never reveal the identity of the company or individuals unless necessary.

If a co-worker receives information from a third party, he/she must act with care to prevent Generix Group from being accused of misappropriation or illicit use of this information.

The receipt of confidential or restricted information (whether oral, visual or written) must not take place before Generix Group and the third party concerned have formally accepted the conditions of its use in a written agreement approved by the Legal Department.

6.5 SOFTWARE ACQUISITION

Special care must be taken when acquiring software from third parties. Indeed, software is protected by copyright and sometimes by patents or business privacy.

Before using any software (free or not), each co-worker must ensure that it has an appropriate license and that the purchasing process has been followed for validation.

Before accessing software or data on a computer network, or approving a license agreement, each co-worker undertakes to respect the terms of the license and the internal procedures of use (see Generix Group IT charter).

If an employee acquires a software for a material which belongs to him personally and for a private use he must:

- not reproduce any part of this software for the execution of a work carried out for Generix Group

- nor download this software into a computer system belonging to Generix Group

- nor, in general, introduce this software into Generix Group premises.

This applies to any copy of the software that is on network services or in databases.

» In case a problem concerning the property or licensing rights for a software occurs, the co-worker must consult his/her line manager before dispatching the software within Generix Group.

7. GENERIX, A CORPORATION THAT FIGHTS AGAINST BRIBERY AND MONITORS BUSINESS GIFTS POLICY

7.1 PRINCIPLES

It is forbidden for any Generix Group director, officer, employee or partner to offer, promise or pay anything of value to a representative of the public administration or of an entity in which a state has a controlling interest or to any private person or entity to obtain an undue advantage.

It is also forbidden to receive anything of value from a person who could influence or be perceived as influencing the Group or its customers.

GENERIX Group does not tolerate any form of bribery, nor any act that could be perceived as such anywhere in the world.

Gifts, services or invitations to attend events are frequent in business life. However, while these gifts are part of good business relations, they are only permitted under certain conditions.

Indeed, gifts and invitations may be instruments of corruption practices aimed at unduly obtaining advantages (a contract, privileged information, preferred contractual conditions, etc.) or at least casting doubt on the existence of collusion between a person and Generix Group.

Purpose of business gifts: promote a product or service (e.g., invitation to a trade show), negotiate a contract outside the workplace, thank employees of another company following a successful partnership, etc.

This is the reason why Generix Group strictly monitors these practices.

Subject to enforced local laws and regulations, and the approval of the supervisor, the employee is authorized to:

- » offer or accept meals invitations or tickets to a show provided that the corresponding expenses are kept to a unit value and per person of less than 50 euros;
- » accept from suppliers, in the scope of training or information sessions, the payment of transportation, meal and accommodation expenses; receive gifts such as promotional discounts from transportation companies, hotels, car rental companies and restaurants when given to individuals participating in promotional programs and offered to travellers generally;
- » accept or offer a low-value gift, such as a promotional item, when it is usually offered to third-parties who have a similar business relation with the customer or supplier.

It is strictly prohibited to:

- solicit from a supplier or customer or accept from them money or a gift that would be or could reasonably be of such a nature as to influence or give the appearance of being able to influence Generix Group's business relationships with that supplier or customer. This applies to the directors, the employees and any member of their family.
- give money or gifts to the managers, representatives or employees of a supplier, customer or any other organization if this action is likely to influence or be reasonably interpreted as being likely to influence the business relationships that this organization has with Generix Group.
- accept fees, commissions, or any other form of compensation from anyone other than Generix Group for referring customers to outside firms such as project partners, software providers, or financing companies.

If an employee receives money or a business gift that is not customarily offered in the course of their business dealings, at home or at the office, the employee must immediately inform the Legal Department. Arrangements will be made to return it, or dispose of it appropriately (e.g., distribution to employees)

7.2 BUSINESS GIFTS AND PUBLIC ADMINISTRATION

- » Business relations with the public administration are strictly regulated. No gift or amount of money shall be given to any officer or representative from a national or foreign administration if this gift is or could reasonably be considered as directly related to the business relations, he/she has with Generix Group.
- » Generix Group prohibits any payment or gift to a public figure, political party or candidate. This applies to any public entity, including universities or public companies.

8. GENERIX, A CORPORATION THAT PREVENTS CONFLICTS OF INTEREST AND INSIDER TRADING

Conflict of interest

Each co-worker may face a conflict-of-interest situation if he has personal activities or interests that he would promote to the detriment of Generix Group's interests.

The employee undertakes to avoid situations in which his loyalty could be compromised.

Generix Group's officers, directors and employees must notify the Ethics Committee of any significant financial interest (generally more than 10% of a company or other economic entity) that they or a member of their close family may hold in the capital of a competitor or supplier, or of any other company, likely to result in a breach of the duty of loyalty, or even the mere appearance of such breach.

Examples of conflicts of interest

Holding financial interests in a company with which Generix Group has business relations (suppliers, competitors, customers, distributors, etc.).

Helping in any way whatsoever a company that sells products and services in competition with Generix Group's existing or potential products or services generates a conflict of interest.

In order to determine whether a conflict of interest exists, here is a check list of questions to address:

What is the nature of the business relationships between Generix Group and the other company?

Are they competitors?

To what extent and in what way? If the other company has several areas of activity, how important is the area that competes with Generix Group or is a supplier of Generix Group?

How important is my investment with respect to my compensation and other family income, including revenue from other investments?

Is my investment important enough to lead me to take certain initiatives, as a Generix Group co-worker, in order to protect or enhance it?

Given my duties at Generix Group, to what extent are my initiatives as a Generix Group employee likely to affect the value of my investment in the other company?

Through my behaviour, will I be able to significantly increase the value of my investment, even if it is relatively modest?

If, objectively, the combination of the work, the amount of the investment and the nature of the company in which the co-worker has invested can influence his/her initiatives as a Generix Group employee, taking such a financial interest is then questionable.

If it is a supplier or a joint-venture and the co-worker participates directly or indirectly in the decision to establish business relations with them, no financial interest whatsoever can exist in that company.

It may also happen that a supplier, business partner or customer of Generix Group - whether already existing or future - offers stock options or other securities to a selected group of investors with a view to a subsequent public offering.

It would be questionable for the co-worker to accept to receive or acquire such securities if there could be any doubt as to whether this offer is related in whole or in part to his/her employment with Generix Group or whether this investment is contrary to another Generix Group directive.

These investment rules shall not be bypassed by acting through an intermediary.

Case of "non-listed" companies

Investing in such companies can raise complicated issues in so far as the owners or managers of such companies often hold a relatively higher proportion of the shares. Investors could also often participate in the daily management of the company and risk being identified with it.

For these reasons, Generix Group co-workers shall refrain from investing in a competitor, distributor or reseller of Generix Group products, unless the company's shares are widely disseminated to the public and traded on the stock market.

The close ties that may exist between the company and its owners may lead competitors to believe that the company derives some kind of advantage from Generix Group.

8.1 PRIVILEGED INFORMATION AND INSIDER TRADING

Privileged information is undisclosed information that, if known, could reasonably be used by an investor to decide to buy, sell or hold shares and securities.

Generix Group formally prohibits transactions on its shares during so-called "closed periods". Outside these closed periods, it is strictly forbidden for any co-worker to buy or sell shares if he/she holds privileged information.

A policy and procedure designed to define the use of privileged information and prevent insider trading has been set up at Generix Group since May 1, 2010 and is available on the Generix Group intranet site.

8.2 CASE OF A RELATIVE WORKING IN THE IT AREA

If a co-worker has a family member or close relative who is a Generix Group competitor or supplier or is an employee of a Generix Group competitor or supplier, he/she undertakes to pay the utmost attention to the information he/she holds and not to disclose it to his/her personal entourage.

8.3 PARTICIPATION IN PUBLIC LIFE

The co-worker or director may participate in a personal capacity in public life, but in this capacity, he/she may be confronted with a decision that affects Generix Group (purchase of Generix Group services or tax decision, for example).

The co-worker and the director undertake to respect the law which may require them not to take part in this type of decision.

In order that Generix Group is not affected, the co-worker and the director undertake to make known their relationship with that he/she is a Generix Group collaborator, to avoid any accusation of having tried to favour the company and/or to hide his/her links with the company.

II. EMPLOYEES COMMITMENT

Each employee complies with the principles of this document and undertakes to respect the rules of ethical conduct.

Any employee who fails to comply with this Rules of Ethics and good professional conduct may engage his civil and even criminal liability as well as that of Generix Group.

1. PROHIBITION TO COMPETE WITH GENERIX GROUP

» It is prohibited to work for a competing company, in any capacity whatsoever (employee, consultant, director, etc.).

» It is prohibited to market, whether it is for profit or not, products or services that compete with Generix Group's existing or potential products in return for any direct or indirect compensation.

2. PROHIBITION TO BE A SUPPLIER OF GENERIX GROUP

No employee is authorized to be a Generix Group supplier, represent a supplier to Generix Group, work for or be a director of a Generix Group supplier.

3. WORKING AT GENERIX GROUP AND USE OF GENERIX GROUP ASSETS

During their working hours, whether on Generix Group's premises, on assignment or working from home, it is forbidden to all co-workers to carry out tasks other than those assigned by Generix Group.

Similarly, no co-worker is authorized to use the facilities, telephones, equipment, resources or information belonging to Generix Group for work outside the company.

4. PERSONAL STATEMENTS AND POSITIONS

All co-worker's statements and positions are made in his/her personal name and shall never give the impression that he/she is speaking or acting on behalf of Generix Group.

III. INTERNAL ALERT PROCEDURE

Our Rules are essential to our reputation and consequently to the development of our activity.

As guarantors of its application, we shall not remain passive if we witness facts or practices that are contrary to this document. Therefore, Generix Group encourages its co-workers to report any facts they witness that contravene laws and regulations or the present Rules of good conduct in business.

1. PROCEDURE

Generix Group Ethics Committee investigates and rules on facts or behaviours contrary to the Rules.

The Ethics Committee is composed of the General Management, the Legal Department and the Human Resources Department.

- » The employee sends an e-mail to the Ethics Committee explaining the facts he/she has directly witnessed. The employee will receive an acknowledgement of receipt from the Committee.
- » Upon receipt, the Ethics Committee takes over the issue within 3 days (72 hours), respecting the principles of confidentiality, impartiality, the presumption of innocence and applicable local laws and regulations.
- » The Ethics Committee appoints a representative of GENERIX GROUP's management, who has no conflict of interest with the facts reported, to investigate the case and collect information.
- » The department in charge of the investigation reports to the Ethics Committee.
- » If the facts do not fall within the Ethics Committee's competence, the case is forwarded to the Directorate concerned to resolve the problem, if necessary, with the Ethics Committee's support.
- » If the facts fall within the Ethics Committee's competence, the Ethics Committee meets and decides on the corrective measures to be implemented to fix the issue and, if necessary, to sanction the facts.
- » The respondent will be informed of the nature of the allegations made against him/her and the findings of the investigation.
- » In the course of investigations, information will only be shared with persons who have the authority to know about it in relation to their business duties and to ensure that the report is processed and/or appropriate action is taken.

2. LEGAL SECURITY

- » Any co-worker may be questioned during the course of the procedure. They undertake to cooperate fully and entirely and to provide, on first request, all useful information and documents.

- » No co-worker who has reported in "good faith" actual or potential corruption, influence peddling, conflict of interest or harassment, in compliance with this reporting procedure, may be sanctioned or subjected to reprisals.
- » Except in cases where legislation requires the reporting of certain facts or behaviours, a co-worker who does not report facts that he or she has witnessed or of which he or she has been informed may not be sanctioned.
- » The co-worker who has launched the alert procedure is informed of the results of the investigation and the decisions taken.
- » Generix Group ensures that the co-workers involved are protected against any measure or behaviour that could be prejudicial to them until the procedure has been completed and then onwards in compliance with these rules.
- » Generix Group treats the case with the strictest confidentiality.
- » The alert system has been subject to a privacy impact assessment in accordance with the GDPR.
- » You can exercise your rights of access, modification and deletion by writing to: dpo@generixgroup.com

Anyone having suspicion to be retaliated against should report it immediately and through the same channels as described above.

In "good faith" means here that at the time of implementing this procedure, information is considered complete and honest by the co-worker who informs the Committee, even if it turns out to be wrong later.

Any report that is deliberately misleading and defamatory or pursuing an objective contrary to our stakes of neutrality, equity and respect, may be sanctioned.

Reach the Ethics Committee _____



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Generix Group

Public limited company with a Management Board and Supervisory Board
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