

Version	Author	Reviewer	Date
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Anti-Corruption and Bribery Policy for Pearl Biosystem S.A.S

1. Purpose

The purpose of this Anti-Corruption and Bribery Policy is to uphold the integrity of Biotech Pearl Biosystem and to comply with relevant anti-corruption laws and regulations. This policy outlines the company's commitment to maintaining a high standard of conduct in all business dealings.

2. Scope

This policy applies to all employees, officers, directors, and business partners of Biotech Pearl Biosystem, including contractors, agents, and consultants.

3. Policy Statement

Biotech Pearl Biosystem prohibits any form of corruption, bribery, or unethical business practices in its operations. This includes, but is not limited to, offering, giving, receiving, or soliciting something of value to influence any business decision.

4. Definitions

- **Bribery**: Offering, promising, giving, accepting, or soliciting a financial or other advantage as an inducement for an action that is illegal or a breach of trust.
- **Corruption**: Abuse of entrusted power for private gain.

5. Responsibilities

- All employees must comply with this policy and report any suspected violations.
- Department heads are responsible for ensuring that their teams understand this policy and related procedures.
- The Compliance Officer will oversee and enforce this policy, providing guidance and support as needed.

6. Prohibited Practices



- Gifts and Entertainment: Employees may not offer or accept gifts or entertainment that could influence a decision or create a sense of obligation. Small promotional items of nominal value may be permissible.
- **Facilitation Payments**: Employees are prohibited from making facilitation payments to expedite routine governmental actions.
- **Political Contributions**: Employees may not make contributions on behalf of Biotech Pearl Biosystem unless explicitly authorized by management.

7. Reporting Violations

Employees are encouraged to report any suspected violations of this policy through the company's confidential reporting mechanism. Reports can be made anonymously if desired. The company prohibits retaliation against anyone who reports a concern in good faith.

8. Training and Awareness

Biotech Pearl Biosystem will provide regular training to employees regarding this policy, relevant legal requirements, and how to recognize and avoid bribery and corruption.

9. Enforcement and Disciplinary Actions

Violations of this policy will result in disciplinary actions, which may include termination of employment or contracts, legal action, and penalties as appropriate.

10. Review and Amendments

This policy will be reviewed annually and may be amended to reflect changes in laws, regulations, or company practices.

11. Contact Information

For questions or concerns about this policy, please contact the Compliance Officer:

Rémi Serrano : rserrano@pearlbiosystem.com