



Version	Author	Reviewer	Date
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Code of Conduct – (U.S. Market) for Pearl Biosystem S.A.S

1. Purpose

This Code of Conduct outlines the ethical standards and expectations that guide our business behavior and decisions. All employees, contractors, and representatives must adhere to these principles.

2. Compliance with Laws and Regulations

We are committed to full compliance with all applicable federal, state, and local laws, including those related to pharmaceutical regulations (FDA), labor, safety, environmental standards, anti-corruption (e.g., FCPA), and data privacy (e.g., HIPAA, CCPA).

3. Workplace Conduct

- We maintain a respectful, inclusive, and harassment-free work environment.
- Discrimination based on race, gender, age, religion, sexual orientation, or disability is strictly prohibited.
- Any form of workplace bullying, harassment, or retaliation is unacceptable.

4. Anti-Bribery and Anti-Corruption

Employees must never offer, give, or accept bribes or kickbacks, whether directly or indirectly. We comply fully with the U.S. Foreign Corrupt Practices Act (FCPA).

5. Conflicts of Interest

All employees must avoid situations where personal interests' conflict with company interests. Any potential conflict must be disclosed promptly to management.

6. Confidentiality and Data Protection

- Employees must safeguard confidential and proprietary information.
- We comply with data protection laws, including HIPAA and the California Consumer Privacy Act (CCPA), to protect customer and employee information.

7. Insider Trading

Employees must not use non-public information for personal gain or share it with others for stock trading or any financial activity.

8. Health, Safety, and Environment

We are committed to providing a safe and healthy workplace and minimizing environmental impact through responsible practices.

9. Use of Company Assets

Company resources, including IT systems, must be used responsibly and primarily for business purposes. Misuse of assets may result in disciplinary action.

10. Reporting Violations

Employees are encouraged to report any suspected violations of this Code without fear of retaliation. Reports may be made anonymously through our Ethics Hotline or directly to HR.

11. Disciplinary Measures

Violations of this Code may lead to disciplinary actions, up to and including termination of employment or legal action.

12. Acknowledgment

All employees must acknowledge receipt and understanding of this Code of Conduct upon hire and during periodic updates.

13. Contact Information

If you have any questions or concerns about this Code Conduct, please contact our Data Protection Officer at: Rémi Serrano: rserrano@pearlbiosystem.com
