



# CODE OF BUSINESS CONDUCT



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## I. President statement

Dear colleagues,

*We care for the ones we work with and for the ones we work for. We care for why we work and the way we do it.*

It is by these simple and wonderful words that we describe what we mean, in Applexion, by our core value “Care for people”.

In order to help you face and resolve the legal and ethical situations you may face in your Applexion activities, we wanted to provide more clarity and details on the company expectations, that are compiled in this Code of Business Conduct.

This Code has been designed to describe the business practices we are promoting as a minimum standard requirement. It has been approved by Applexion management committee (CODIR) and Board. It is describing the basic principles & rules that shall guide our way of doing business and act with others.

It is intended to be clear and transparent. However, due to the complexity and diversity of the environments we evolve in, it is not intended to be exhaustive, nor to replace any responsibility under law that apply to any one of us at Applexion.

Although it is my responsibility to make sure that everyone has been given a clear view on our expectations and rules, as they are described in this first edition of our Code of Business conduct, it is the responsibility of each one of you of reading it, understanding it and adhering to all guidelines included in this Code.

*We care for the ones we work with and for the ones we work for. We care for why we work and the way we do it.*

Therefore, we owe to our stakeholders and our colleagues to always act with the highest level of ethics. This is part of our legacy and what is making our reputation. It is an honor and pride of keeping trust and respect by all in how we do business.

I thank you for your commitment in representing Applexion values and to our long term reputation and successes.

Use this Code to guide your decision making, be a role model for others and above all, feel free to ask questions when you are in doubt.

Damien Brichant  
President



## II. Application of the code of business conduct

This Code of Business Conduct (the “Code”) has been adopted by **Applexion** and applies to all companies operating under **Applexion** tradename: Applexion SAS, Process Solutions Americas LLC, Novasep Asia Co Ltd, Novasep Trading Co Ltd, Novasep Process Engineering Ltd (India), individually and commonly referred as “**Applexion**”, including every director, officer, manager and employee of Applexion (together, “Employees”) and all agents or contractors of **Applexion**.

Each of the above is responsible for understanding the Code and complying with it. In this regard, directors, officers and managers have the special responsibility of not only setting the right tone for all **Applexion** Employees but also of leading by example.

This Code is fundamental to who we are as an organization and how we conduct our business. The Code defines the broad principles of ethical business conduct practiced by **Applexion**, but it cannot take into account every situation. Therefore, when faced with a legal or ethical question, you must use the principles defined in the Code together with your common sense and good judgement to determine what constitutes ethical business practice.

Any violation of the Code will be investigated and appropriately addressed, including through disciplinary actions. Employees should report violations of applicable laws, rules and regulations, this Code or any other code, policy, or procedure of **Applexion** to appropriate personnel, as explained further in the Code.

### III. Compliance with laws and regulations

**Applexion** is a multinational group, with operations in numerous countries around the world. Our reputation for integrity is built on our respect for laws and regulations that apply to our business in all countries where we are present. Therefore, Applexion pledges to our Employees, clients, suppliers, shareholders and other stakeholders that Applexion will at all times conduct its business in full compliance with the law.

**Applexion** expects its Employees to always act in full compliance with applicable laws and regulations.

### IV. Respect for individuals

**Applexion** is committed to treating all individuals with care, dignity and respect.

**Applexion** is committed to promoting diversity and hires the best people based on equality of opportunity. Applexion prohibits all forms of discrimination based on personal characteristics such as nationality, race, religion, gender, disability, sexual orientation or age, or based on political opinions, religious or philosophical beliefs, or trade union membership.

**Applexion** prohibits all forms of harassment and is committed to promoting a workplace where all of its Employees are given the opportunity to flourish and participate in Applexion's success. Applexion ensures that working hours and remuneration comply with applicable laws and are fair and just.

**Applexion** does not use or support the use of any child labor, forced or bonded labor.

**Applexion** recognizes and respects the rights of Employees to freedom of association and collective bargaining.



## Questions & Answers



*“One of my co-workers tells me that his/her line manager gives him/her the impression that he does not like him/her and has started to humiliate him/her in public and to harass him/her in various ways. He/She is afraid to complain or report this behavior to anyone. What should I do?”*



Even if it does not concern you directly, you are strongly encouraged to report a possible violation of Applexion’s Code of Conduct. You should also encourage your colleague to raise the issue directly with his/her line manager in order to clarify the situation. However, if this is not possible or useful, he/she should contact the dedicate representative within the work council or a representative of the human resources department or use the alert procedure set out in the Code.

## V. Protection of information

### 1. Privacy and data protection

**Applexion** strives to protect the reasonable privacy expectations of its Employees, clients, suppliers, and other business partners. **Applexion** treats the personal data entrusted to it as confidential and is committed to collecting, using, retaining, and disclosing personal data in a legitimate, fair, transparent, and secure way.

Personal data can be any data relating to Employees, clients, suppliers, business partners or any other affected individuals that identifies or makes it possible to identify individuals. **Applexion** must therefore ensure that all personal data collected is limited to the minimum necessary and is collected specifically and solely for the needs such data was collected (business needs, human resources ...). **Applexion** must also ensure that it does not collect any data that may not be collected or otherwise processed under applicable law, and that it protects personal data by way of appropriate safeguards.

There are certain instances where **Applexion** must obtain consent to collect, use, retain, and disclose personal data (e.g., where so required by applicable laws). **Applexion** respects the rights of individuals to be informed of the personal data which **Applexion** holds and its use. Applexion will ensure that such individuals can access, correct or delete such data, or restrict or object to the processing of such data as may be required by applicable law.

Once **Applexion** no longer has a business or legal need for the personal data, **Applexion** shall destroy without delay such data in accordance with applicable legal obligations and **Applexion** retention policies.

## Questions & Answers



*“My best friend works for another company in the same industry as Applexion. During a lunch, he asks me questions about the differences and similarities between Applexion and his company. How much am I allowed to disclose?”*



You should be very cautious in order not to disclose sensitive information! If you are not sure the information you are about to share is already publicly available, you should not share such information with your friend.



## ***2. Use and Protection of Confidential Information and Business Assets, Trade Secrets, and Intellectual Property***

**Applexion** has a duty to protect and make careful use of its company confidential information and business assets. Employees should also ensure that confidentiality is maintained with regard to trade secrets and sensitive information.

**Applexion** has in place additional protection in the form of intellectual property rights. **Applexion's** intellectual property rights are critical to the protection of its product innovations and ideas. **Applexion** complies with intellectual property laws that govern the rights to protect its own and others' trademarks, copyrights, trade secrets, patents, and other forms of intellectual property. Any information relating to **Applexion's** business that Employees encounter in the course of their employment is the exclusive property of **Applexion**. Examples include trade secrets and non-public information regarding: **Applexion's** business assets; **Applexion's** earnings; technology; human resources, organization, business plans and strategies; intellectual property; and clients.

Third parties (Customers or other stakeholders) also share with **Applexion** some Confidential Information, Trade secret and IP, generally under specific circumstances (ie. Contracts). **Applexion** also has a duty to protect, make careful and restricted use of these information and to comply to any contractual and legal obligations related to their use and disclosure.

Employees of **Applexion** who are privy to confidential information or trade secrets (belonging to **Applexion** or third parties) may only use such information and business assets with the utmost care and only for legitimate and lawful business purposes.

Employees are not permitted to disclose such information to third parties (including friends and family of the Employees). Employees shall maintain confidentiality even in the absence of a formal secrecy obligation. Employees are so obliged both throughout the course of their employment or engagement with **Applexion** and after their employment or engagement has terminated.



Employees should take all reasonable precautions to safeguard and protect sensitive commercial information and trade secrets in order to prevent misuse of any kind. Employees should exercise caution when discussing **Applexion's** confidential information in public and should avoid reading confidential documents in public places without appropriate measures.

## **VI. Prevention of conflicts of interests**

A conflict of interest arises when private interests of the Employees interfere with the fulfilment of the Employees' duties towards Applexion or, more generally, with the interests of Applexion.

Employees have a duty of loyalty to **Applexion** and must act in the best interests of **Applexion**. Employees must therefore be free from any conflicts of interest which may interfere with their ability to act in the interests of **Applexion**.

**Employees should avoid actual, or the appearance of, conflicts of interest, including, but not limited to, the following:**

- ⦿ Employees must avoid taking any actions or acquiring interests that make it challenging to perform work for **Applexion** in an objective and effective manner.
- ⦿ Employees should act in a fair and objective manner when conducting business with third parties on behalf of **Applexion**, without favor or preferences based upon personal considerations.
- ⦿ During the term of their employment with **Applexion**, Employees are also expected to put the interests of **Applexion** ahead of their own business interests and must not engage in activities that compete or could potentially compete with **Applexion's** current or proposed products and/or services.
- ⦿ Employees should not own any interest in any business that does or is seeking to do business with **Applexion**. Employees should also avoid other situations which may cause conflicts of interest, and particular care should be taken with close relatives who work for a business partner or competitor of **Applexion**.

Conflicts of interest may arise without intention. In this regard, Employees should be aware of any potential conflict, because early identification and disclosure will allow us to cooperate to resolve the conflict before any issues arise. Therefore, Employees who detect an existing or potential conflict of interest should immediately consult their line manager or a **Applexion** CODIR member to discuss which steps can be taken to avoid or to resolve the conflict.

## Questions & Answers



*“I would like to launch a business during my free time to supplement my income. Could this be a conflict of interest?”*



Serving in any occupational capacity outside of Applexion could be forbidden by your employment contract. In the case there is no such prohibition, you should first obtain your HR manager’s approval to ensure there is no conflict of interest.



*“My cousin has been appointed sales director of a supplier of lab equipment and wants to offer his services to Applexion. He is offering very attractive attractive prices compared to the competition. Can I recommend him ? “*



Your family connection should not influence in any way Applexion’s choice of supplier. Should you wish to share your cousin’s proposal with Applexion colleagues, you should clearly indicate the conflict of interest. You must also refrain from taking part in any decision making

## VII. Trade sanctions and export control

**Applexion** is a global business with significant operations in Europe, North America (including the US), and Asia. **Applexion's** international operations can trigger issues under applicable trade sanctions and embargoes laws, as well as export control laws.

Trade sanctions and export controls laws differ between countries and apply to more than just physical shipments. They also apply to electronic transfers of technical data, software and technology, financial transfers and the provision of certain services. Some countries' trade sanctions and export controls rules can apply in an extra-territorial manner (including those of the US).

**Applexion** and its Employees must comply with all applicable trade sanctions, import, and export laws and regulations when engaging in international trade and transferring goods, funds, services, software or technology, even if this means foregoing business opportunities.

Employees should ensure that, where applicable, any necessary export authorizations are obtained and complied with.

Employees responsible for importation or exportation of goods, software, or technology (including items carried in hand baggage) should familiarize themselves with the import and export laws and regulations that apply, including those of other countries affected by the transfer.

Employees should be alert to suspicious enquiries from individuals, organizations, or third parties acting on behalf of other organizations attempting to gain access to Applexion's goods, funds, software or technology which may otherwise be denied to them by virtue of trade sanctions and embargoes or export controls.



## Questions & Answers



*“One of our agents requests a quotation for one of his clients who wishes to purchase certain chromatography and filtration equipment from Applexion. What do I have to be aware of?”*



In addition to knowing the entity you are selling our equipment to, you should also know the end-user of our equipment and aware that national and international regulations imposing economics restrictions and prohibitions on certain kinds of shipments to certain locations could apply and sanction a sale not in conformity with this regulations. If you have any doubt on your customer, you should contact a Applexion CODIR member for further escalation.

## VIII. Fighting bribery and corruption

**Applexion** does not tolerate bribery under any circumstances. **Applexion** conducts business honestly and transparently and does not seek to exercise improper influence on any individual or entity. It is important that those with whom **Applexion** interacts, including government officials, make impartial and objective decisions without improper influence.

As a global company, **Applexion** is subject to domestic and international anti-bribery and anti-corruption laws which criminalise the offer or payment of bribes to government officials (including any officer or employee of a government, government body, or public international organization; anyone acting on behalf of a government; or any candidate for political office), state owned enterprises, and private parties (e.g., competitors, suppliers, contractors, clients, or representatives). These laws include the French law “Loi Sapin II”) (Loi no 20161691 du 9 décembre 2016 relative à la transparence, à la lutte contre la corruption et à la modernisation de la vie économique), the U.S. Foreign Corrupt

Practices Act (FCPA), the Bribery Act of 2010 (UK Bribery Act) and other national laws implementing the 1997 OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (together, “Anti-Corruption Laws”).

Companies and individuals using corrupt practices may be liable for civil and criminal penalties, including heavy fines and prison sentences. In addition, corrupt practices committed in one country may result in civil and criminal proceedings not only in that country but also in other countries, given the extra-territorial application of most Anti-Corruption Laws. Corrupt practices risk exposing their perpetrators (especially companies) to very significant adverse commercial consequences (loss of contracts) and to serious reputational damage.

Specifically, Employees must not provide, offer, solicit, promise, or authorize anything of value (including money, goods, hospitality, entertainment, services, travel, intangible benefits, such as enhanced reputational standing, gifts, or any other item of value, no matter how small), directly or indirectly (through third parties such as agents, distributors or contractors), to any person in order to induce that or another person to improperly perform a function or activity, to improperly influence them, or to improperly obtain or retain a business, or any other advantage. Employees must not respond to solicitations with the same objective.

Employees must also not engage in facilitation payments (i.e., payments to government officials for the purposes of expediting routine activities).

Regardless of whether such facilitation payments are routine in certain parts of the world, they are not tolerated by **Applexion** and may result in violations of Anti-Corruption Laws.

Employees are also prohibited from requesting or accepting, directly or indirectly, payments or anything of value from a private party for the purposes of providing favorable treatment related to **Applexion’s** business.

When dealing with those who act on behalf of **Applexion**, including business partners, Employees should carefully monitor such relationships and be attentive to warning signs of potential corruption on their part. Employees who detect any sign of potential corruption should immediately report the issue through the appropriate channels (explained below) for appropriate follow up, including termination of the relationship with the business partner involved.

## IX. Business partners

**Applexion** aspires to promote and encourage social responsibility throughout its value chain. As a result, **Applexion** prefers to do business with partners (including, but not limited to, third party suppliers, representatives, or agents) whose ethical, social and environmental standards are consistent with our own.

**Applexion's** suppliers are expected to follow our supplier code of conduct and be always in compliance with all applicable laws, including the Anti-Corruption Laws. **Applexion** will follow-up, as appropriate, on each reported instance of non-compliance. The agreements regulating the relationship with each, and all business partners include, to the maximum extent possible, clauses that allow **Applexion** to terminate the business relationship in case of non-compliance with applicable laws, including the Anti-Corruption Laws.

### Questions & Answers



*"I work with a consultant based in Eastern Europe who helps me find new potential clients for our process engineering solutions. He asked me for remuneration for his services which in my opinion is too high compared to what he is doing on the project? What should I do?"*



The remuneration should be in line with the fair market value of the services provided. If the remuneration is not proportionate with the service provided, you should not accept the consultant's request. You should anyway discuss with your line manager and get his approval and support to find the adequate solution.

## X. Competitions and anti-trust laws

**Applexion** intends to comply with all applicable competition and antitrust laws in countries where it does business. **Applexion** is committed to the principle of free and fair competition.

Antitrust laws seek to protect competition by prohibiting anti-competitive behavior that results in decreased competition, unjustified price discrimination or other artificial forces in the market. Antitrust laws exist in virtually all major jurisdictions and apply to conduct at all levels of **Applexion's** organization.

To avoid participating in prohibited anti-competitive behavior, Employees must not engage in anti-competitive behavior such as the following:

- entering into any agreements with competitors to: raise, lower or stabilize prices; boycott or refuse to deal with certain customers; reduce output of services; allocate clients, services, or geographic territories; or coordinate with competitors on employees' wages and benefits (except as permitted by law); and
- exchanging competitively sensitive information with competitors or discussing the same at industry meetings.

Competition and antitrust laws are complex, and the consequences of violating competition and antitrust laws are severe. Employees should be particularly careful at industry meetings and trade shows to avoid the appearance of anti-competitive behavior. In case Employees have doubts about whether or not certain conduct may be anti-competitive, they should immediately consult their line manager or a **Applexion** CODIR member.



## Questions & Answers



*“One of my long-time friends works for a competitor as a sales along with my friend’s plan?”*



No. Allocating customers or geographic territories is a violation of the law in almost all jurisdictions and Applexion does not permit it in any location. If a competitor ever initiates a discussion about allocating territories, stop the conversation immediately. Report any attempt to discuss immediately to an Applexion CODIR member.

## XI. Environment, Health, Safety & Decarbonation

**Applexion** is committed to operations and practices which prevent harm to people and damage to the environment or property and supports Industry efforts toward decarbonation. **Applexion** strives to reduce the environmental impact of its products, increase the decarbonation impact of its products and services, to provide a safe working environment, and to take necessary precautions to avoid personal injury or harm to Employees.

**Applexion** also aims to take appropriate steps to ensure that Employees maintain the high standards necessary to minimize the impact of their activities on the environment and reduce carbon emissions.

Employees must comply with all applicable environmental, health and safety laws and regulations that affect Applexion and its business activities.

**Applexion** also expects its suppliers and business partners to comply with applicable environmental, health and safety laws and regulations in their business operations and promotes them supporting similar path toward decarbonation.



## XII. Accurate business book and records

No false or misleading entries, or omissions of fact, must be made in **Applexion** books, records, or accounts for any reason. **Applexion** will ensure that it keeps books, records, and accounts in reasonable detail that accurately reflect all transactions, dispositions of assets, and other events (ie. related to financial, business, legal incl IP, social commitments).

Employees must promptly record information accurately and honestly, maintain the security and confidentiality of all records, retain records in accordance with applicable laws and regulations and **Applexion** policies, and only destroy such records with written approval of his/her line CODIR member.

**Applexion** will have policies and procedures in place, including adequate internal controls to provide reasonable assurance that management is aware of, and directing, all transactions in compliance with company policies and to ensure that its books, records, and accounts are accurate, complete and do not obscure or mask corruption in any way.

No payment on behalf of **Applexion** may be approved or made with the intention or awareness that any part of the payment is to be used for any purpose other than that described by the documentation supporting the payment.

Employees who have any concerns regarding questionable accounting, internal accounting controls or auditing matters relating to **Applexion** should immediately report those concerns. Such concerns may include:

- fraud or deliberate error in the preparation, evaluation, review or audit of any of **Applexion's** financial statements.
- fraud or deliberate error in the recording and maintaining of **Applexion's** financial records;
  - deficiencies in, or noncompliance with, **Applexion** internal accounting controls;
  - misrepresentation or false statement to, or by, a senior officer or accountant regarding a matter contained in **Applexion's** financial records, financial reports, or audit reports; or
  - deviation from full and fair reporting of the financial condition of **Applexion**.

### XIII. Implementation and reporting violations of the code

Each Employee shall receive a copy of the present Code. **Applexion's** management shall ensure that each employee is regularly included in training programs and shall monitor compliance with the Code. **Applexion** encourages open discussion of compliance with the Code by all Employees.

If you have questions or concerns about the principles set out in the Code, please consult:

- your line manager, or
- a representative of **Applexion's** human resources department, or
- an **Applexion** CODIR member.

Any Employee can report known or suspected violations of the Code via the alert procedure set out below concerning any of the following topics (the “Alert Issues”):

- discrimination and harassment,
- protection of the environment,
- health and safety at work,
- anti-competitive practices,
- accounting, finance and anti-corruption issues.

If an Employee is aware or suspects, in good faith, any violation or contemplated violation of the Code concerning Alert Issues, such Employee is strongly encouraged to report it as set out below. This alert procedure is not compulsory, and Employees will not be subject to adverse consequences in the event of non-use.



**Please write (in English or French) to Applexion President:**

through dedicated e-mail address:

[compliance@applexion.com](mailto:compliance@applexion.com)

or directly at:

[damien.brichant@applexion.com](mailto:damien.brichant@applexion.com) with direct reference to compliance issue in the object.

**Applexion** operates a strict non-retaliation policy. As such, any Employee who, in good faith (i.e., in reasonable belief in the truth and accuracy of the information), raises a concern regarding a possible breach of the Code through an Alert Issue, shall be supported by **Applexion** management and will not be subject to any retaliation for having reported the activity. Any act of threat of retaliation will in and of itself be treated as a serious breach of the Code and may be disciplined accordingly. However, if an Employee raises a concern which he or she knows to be false or with a malicious intent such Employee may face disciplinary action and/or legal proceedings.

The allegations reported on a confidential basis will be promptly investigated, with support from any useful functions or external advisors when necessary. All Alert Issued and related investigations will regularly report to a representative of **Applexion** Board of Directors.

As part of investigations concerning countries outside of the European Union such as the US, India and/or the People's Republic of China, transfers of personal data within the scope of such investigation may be made outside of the European Union to such countries.

Individuals whose conduct is reported will be informed as soon as possible, subject to any preliminary investigations that may need to be conducted. They are entitled to the rectification and/or erasure of any data about them that are inaccurate, incomplete, ambiguous, or out of date.

Breaches of the Code by Employees may result in disciplinary action, up to and including dismissal. Applexion shall ensure that any such action fully complies with applicable local employment laws. In some cases, breaches of the code may result in a violation of applicable law, which can result also in other civil or criminal sanctions, including monetary fines for Applexion and/or the Employees involved, as well as imprisonment.

Any report that reveals fraud, a significant compliance breach or a significant internal control weakness will be addressed by corrective action and/or disciplinary action and/or legal proceedings.