



PARTICIPATIVE EQUITY

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Introduction

Our Mission

The WHO Constitution states that "The enjoyment of the highest attainable standard of health is one of the fundamental rights of every human being". At BILHI Genetics, we believe that P4 medicine – Predictive, Preventative, Personalized and Participatory – is the way to success. We develop tests that can predict the risk of developing certain serious diseases. By identifying at-risk individuals well in advance, we can help them to stay healthy and not develop these diseases, through the implementation of preventive treatments and a personalized follow-up by health professionals.

This approach is collective. Employees, laboratories, doctors, public and private health organisations, research institutions and international organisations: we work with a network of people sharing the same objective, that of a better state of health for the greatest number of people. The human being is at the heart of the concerns that govern all of our activities. It is at the very heart of our values and the principles of action we wish to set ourselves within the framework of this code.

Our values

Principals of equality

THE FIGHT FOR HEALTH EQUALITY

We want everybody to have the same access to healthcare. We are working on this principle of equality, by searching for solutions that can overcome economic and social conditions which prevent healthcare access to certain populations.

Resilience

NEVER GIVE UP

We are conscious of the unknown obstacles that we will face, and know that we will be able to tackle them with bravery, because we believe in our convictions and we act daily with the intention of accomplishing our mission.

Benevolence

GUARANTEED WELL-BEING FOR EVERYBODY

If our existence is indeed for the well-being of the patient, then it is just as important for us to be attentive to our colleagues and business partners. It is therefore essential that our actions are lead by benevolence.

Cohesion

PRESERVE THE LINKS WHICH REUNITE US

Rich in our professional and cultural diversities, we strive to ensure a certain power in cohesion, both internally and with the participants involved in our development, in order to maintain our goal.

Emulation

GIVE EVERYTHING OUR BEST SHOT

At any given moment, we apply an emulative mindset and we excel in our research and our actions. Being passionate and enthusiastic about what we do is source of our relentlessness.

Trust

BE TRUSTWORTHY

Trust from our patients, employees and business partners is fundamental. It has been accumulated over 30 years of research and clinical trials at INSERM, as well as our engagement to be transparent, honest, rigorous, clear, comprehensive, and above all, to guarantee a patient's privacy and intimacy.

Search for meaning

DARE TO QUESTION OURSELVES

Our never-ending search for meaning: to understand and question ourselves constantly over how best to utilize and implement predictive medicine. We do not do this out of obligation, but out of desire to take a humanistic approach in our work.

Foreward

“This commitment, formalised by this document, embodies our aspirations and the values to which all our stakeholders adhere and around which the culture of our company is built. It is important for us to materialise it now, so that this code could be a useful guide at a time when our company is developing in several markets. It is the guarantor of our initial aspirations and the identity of the company. It applies to all of us, wherever we are and whatever our function. Each one of us, as ambassadors and stakeholders of BILHI Genetics, pledge to respect this code, in spirit and in letter.” Pierre Dessein, President.

Each one of us must always be aware that:

- The values and principles in this document are not optional: we must all respect them;
- We must set an example: the reputation of BILHI GENETICS depends on each one of us;
- Everyone is appreciated, not only for what they do, but also about how they do it;
- Ethical issues are rarely simple, but they must be addressed;
- In everyday life, integrity and respect for people are the most essential values.

How should we use this code of ethics?

PARTICIPATORY ETHICS does not replace any existing policies and employees must continue to refer to all the rules and standards defined within their work place. On the contrary, this code was designed to provide a framework for these policies and allow employees to better understand their logic and purpose.

This tool should also be able to help them to solve questions and dilemmas that they may encounter in their professional activity.

Clearly, no document can foresee or deal with all situations that may arise, especially since ethical dilemmas are often located in "grey" areas where the solution is not immediately obvious. Whenever our employees think they are facing an ethical problem, the following questions should help them:

1. Does it conform to the spirit of the BILHI Genetics Code of Ethics?
2. Is it legal?
3. What is the impact of my actions on our different stakeholders and how would they react if they came to know them?
4. If in doubt, did I seek help?

We recognise that some situations are far from simple. When in doubt, the golden rule is to point it out and discuss it openly (see also "Let's Talk" chapter).

Technical topics are preferably discussed with our internal experts, specialised in IT, Human Resources, Regulatory, Quality, Purchasing, etc.

Q : Does the Code of Ethics apply to me?

A: Yes, all of us at BILHI Genetics could be faced with an ethical issue in our work: how should they behave towards colleagues and how should they control their own behaviour? How can they deal with difficult or sensitive requests from our customers or business partners? How could they resolve certain questions regarding the use of company property? All these questions have an ethical dimension. The Code of Ethics provides useful and practical help on these different topics and on many other dilemmas that may arise from time to time for all of us.

This charter is addressed to all employees. It also concerns all corporate officers as well as management.

The Code of Ethics is currently available in two languages. The French version is the reference document in France and the English version is the reference document outside of France. Since the company is at the beginning of its development, and since its activity will evolve over time, BILHI Genetics recognizes that this document is not exhaustive and that its contents will be enriched over time.

BILHI Genetics reserves the right to change, modify or correct the code at any time, with or without notice, as well as to act as it sees fit for each individual situation.

Let's talk

BILHI Genetics encourages dialogue and invites employees to openly express their legitimate concerns.

All employees must act in accordance with the BILHI Genetics Code of Ethics.

We encourage all of our employees to express their views, defend their opinions and report unacceptable behaviour or requests.

We know that our employees may have concerns about certain practices and need help and advice to resolve them.

We will ensure that any concerns expressed in good faith regarding possible inappropriate behaviour by the Company, any of its employees, or a business partner, are reviewed in detail and that appropriate action is taken. "Good faith" means here that they consider the information they provide is honest and accurate at the time they give it to us, even if it was later proven to be wrong.

We will ensure to respond to anyone who has expressed such concerns to us, where appropriate and the information can be shared without breaking the law or other confidentiality obligations.

The normal way to report such concerns is to inform your superiors. If for any reason this does not suit, we invite the employees to inform their Human Resources representative. They may also have additional resources, such as staff representatives.

At BILHI Genetics, the Ethical Committee is ultimately the guarantor of compliance with this charter.

If the collaborators express their concern and the response given to them does not satisfy them or if, due to exceptional circumstances, it is not possible to address their concerns, they can contact the members of the Ethical Committee directly.

We draw their attention to the fact that even though we do not prohibit anonymity, we do not encourage it. We believe that we offer sufficient guarantees that an Employee who wishes to express a concern in good faith may do so without having to hide their identity. In addition, it is difficult to conduct a thorough investigation of a situation if it has been reported anonymously.

Rules of conduct

We give paramount importance to respecting the laws and regulations that govern our activities all over the world.

Each employee must ensure at all times that his/her initiatives and actions are carried out whilst respecting:

- these laws and regulations, but also
- the codes of conduct and good practice.

The engagements of this Code cannot stray from these agreements. The provisions of this Charter cannot thus derogate from all these provisions. Therefore, if the application of the principles set forth in this Charter results in conduct or action not in accordance with these provisions, the latter shall prevail. It is further specified that the provisions of BILHI Genetics

codes and charters specific to certain activities may not derogate from the stipulations of this Charter.

Respect for individuals

We ask that all our Collaborators and all our entities work together, with the upmost respect for one another and with cooperative spirit. In this way, we will maintain a culture based on loyalty, trust and solidarity. We must recognise others' ideas as well as their contributions. Teamwork is encouraged, and successes and failures must be shared. We must listen to, and freely share, information in accordance with the rules of confidentiality. The disparagement of colleagues is contrary to the values of BILHI Genetics.

In all our research activities, we strive to guarantee the rights, safety and well-being of all participants. We commit ourselves to respecting a set of ethical principles as stated in the Declaration of Helsinki as well as the principles of Good Clinical Practice.

IN PRACTICE, employees must strive to:

- Respect the national legal and regulatory provisions applicable to an individual's rights;
- Refer to BILHI Genetics' recommendations and procedures for the respect of individuals;
- Behave respectfully, free of any form of discrimination or harassment towards an employee or a third party;
- Be open-minded, courteous and considerate;
- Respect others and treat others as they would like to be treated;
- Take care, in accordance with their training and circumstances, of their health and safety as well as that of other collaborators. They must inform Human Resources of their health and safety, as well as that of the other collaborators, and inform the Human Resources of any deteriorating situation, to which they are a victim or merely a witness, in relying on tangible and objectively verifiable elements;
- Recognize the work of each of its colleagues at its true value solely in view of the merit and the results obtained;
- Do not hesitate to approach your hierarchy, the Human Resources Manager or the Ethics Committee if you violate the principles set out in this charter.

Respect for the privacy and protection of personal data

The protection of personal data is a fundamental right which ensures that an individual's privacy is respected.

All employees, as well as third parties with whom BILHI Genetics is in contact (patients, people, doctors, service providers, laboratories, etc.), have the right to respect for their private life. As such, BILHI Genetics is committed to protecting their personal data.

All data collected by BILHI Genetics must be used fairly for a specific, explicit and legitimate purpose, and kept only for the time necessary for the purposes of the treatment concerned.

Since May 2018, BILHI Genetics has developed an information security management system and a data protection management system in accordance with the new legislation in force.

IN PRACTICE, collaborators must:

- Respect the legislation on the protection of personal data in force;
- collect, use, disclose or store personal data only for a specific, legitimate and necessary purpose;
- Protect this data during their collection, processing, use, communication, storage and international transfer;
- Only keep this data only for the duration necessary for the purposes of the treatment;
- Ensure the security of the processed data;
- Ensure that the people whose data are collected are informed of their rights;
- Consult their hierarchy or the Ethics Committee in case of doubt about the use of personal data.

Respecting the Law

La société et ses collaborateurs doivent s'engager à respecter les lois et réglementations des pays dans lesquels BILHI Genetics opère. BILHI Genetics attache une importance particulière au respect, dans l'esprit et dans la lettre, de la loi dans les domaines suivants :

- Droits de l'Homme, notamment l'interdiction du travail des enfants et du travail forcé, le respect des lois contre la discrimination, des dispositions réglementant la durée du travail et la rémunération, des lois prévoyant la représentation collective des salariés ;
- Normes de qualité, d'hygiène et de sécurité ;
- Environnement ;
- Corruption ;
- Fiscalité et communication fidèle des informations financières ;
- Concurrence.

BILHI Genetics souhaite partager ces principes avec ses partenaires commerciaux, et s'assurer, dans la mesure du possible, que ces derniers respectent bien ces mêmes lois et réglementations.

The company and its employees must agree to comply with the laws and regulations of the countries in which BILHI Genetics operates. BILHI Genetics gives particular importance to the respect, in spirit and in letter, of the law in the following areas:

- Human rights, including the prohibition of child labour and forced labour, compliance with anti-discrimination laws, provisions regulating hours of work and remuneration, laws providing for collective representation of employees;
- Quality, health and safety standards;
- Environment;
- Corruption;
- Taxation and fair reporting of financial information;
- Competition.

BILHI Genetics wishes to share these principles with its trading partners, and ensure, to the extent possible, that they comply with these same laws and regulations.

Respect for local customs

We must ensure that we operate in accordance with the cultural traditions and customs of the communities in which we operate.

Sometimes the content of this charter may not exactly correspond to the laws or customs of any country. In this case, where national legislation imposes higher standards than those of the charter, national legislation must always prevail. If, on the other hand, the charter provides for more demanding rules, it is they who must prevail over national legislation, unless an unlawful activity results.

IN PRACTICE, Collaborators must ensure:

- Respect legal provisions and regulations and the principles set out in the Code of Ethics;
- Refer to the Charter and the values to have, in all circumstances, a behaviour respecting the ethical principles that we have set ourselves;
- Identify and analyse, in good faith and without intent to harm, situations and actions that appear to contravene the rules set forth in the Charter or place undue risk on BILHI Genetics;
- In case of question or doubt, contact the hierarchy, the Ethics Committee or, where necessary, implement the Alert Procedure;
- Do not act or appear as a representative of BILHI Genetics by engaging in political activities;
- Do not commit to financially support political parties, politicians or election candidates on behalf of BILHI Genetics.

Confidentiality

Unauthorized disclosure of confidential information may harm BILHI Genetics. We must all ensure that any information that is not public is strictly confidential. Those of us with access to confidential information about our business partners have the same obligation to protect them from disclosure.

IN PRACTICE, Collaborators must ensure:

- Limit the disclosure of confidential information only to those who have a legitimate need to know it and this in the interest of the Company;

- Safely maintain all customer data and confidential suppliers, whether in paper or electronic format;
- Prevent disclosure of confidential information to persons outside BILHI Genetics (including Colleagues' family members);
- Avoid discussing or working on confidential information in public places where conversations can be heard and data security compromised;
- Do not disclose confidential information about a previous employer;
- Return all confidential information (including any copies) in case of departure from BILHI Genetics.

Quality and security

In order to ensure that the genetic test provides a reliable and efficient result, BILHI Genetics has set up internal quality control procedures throughout the production, design, and development stages as well as the monitoring of its software. This level of requirement is also found in the choice of the partner biomedical laboratory.

The safety and quality of the genetic tests resulting from this collaboration are the “sine qua non” conditions for the purpose of the test, namely to provide useful information allowing the implementation of a medical monitoring adapted to the person.

IN PRACTICE, those of us involved in the development, marketing, manufacturing and sales of products must:

- Comply with all laws and regulations regarding test development and labelling;
- Encourage free and open dialogue on issues related to test performance, so that none of them are ignored;
- Make sure that all customer complaints are properly transmitted to the relevant After Sales Service;
- React quickly to any possible problem concerning the safety, the performance of our products and the quality controls;
- Ensure that quality control procedures are implemented at each stage of the predictive analysis process.

Social Impact and Company Responsibility

From the very beginning of the company, even before achieving its first turnover, BILHI Genetics wanted to converge the need to make profit with the desire to have a social impact. In the company's mission, the founders have thus included the desire to use their discoveries to fight Bilharzia, a neglected tropical disease in the poorest areas of the world, in order to change the situation in highly endemic countries, and more generally, to promote the accessibility of genetic predisposition tests to as many people as possible. This approach is at the heart of the company's DNA which, in 2017, changed the name of Genepred into BILHI Genetics, in order to register this primary motivation in the name of the company.

This accessibility policy must be considered globally, across all populations and all product lines of BILHI Genetics. This is why the company has an ACCESS department, which aims to support all of the company's high-impact initiatives.

Starting from a base of strong and humanistic values, and through the implementation of an ambitious and sustainable accessibility policy, we wish to build a virtuous economic model that can reconcile economic profitability and general interest. Each of our stakeholders - employees, shareholders, business partners, etc. must be informed of this ambition and share this vision of improving the state of health for the greatest number of people possible.

On the other hand, BILHI Genetics respects the environment and strives to minimize its ecological impact, by putting in place rules of good practice carried by all of its Collaborators. Every small gesture counts: reduction of paper documents, paper / cardboard / plastic / metal recycling bins and reusable coffee capsules are made available to all Collaborators of BILHI Genetics.

IN PRACTICE, Collaborators are invited to:

- Support the ACCESS activities of BILHI Genetics and actively participate in their deployment in a transversal approach.
- Reflect on how their behaviour, in all areas of BILHI Genetics' business, impact the environment, so as to minimize the negative impact whenever possible.

Competition

Our competitors, as well as public authorities and our partners, are an integral part of our ecosystem. Beyond the respect of free competition, we act in a fair and professional way towards them, as we do with all the actors with whom we interact.

Sharing information about topics such as pricing, costs, or marketing strategies with our competitors may, rightly or wrongly, create the impression that price agreements are being made or give the wrong impression of sharing territories or other kinds of manipulation or distortion of competition.

IN PRACTICE, Collaborators must:

- Avoid contact with our competitors on any confidential matter;
- Avoid encouraging our customers or suppliers to break their contracts with our competitors;
- Refrain from any action depriving a competitor of a source of supply;
- Refrain from denigrating our competitors (including misrepresenting their products or services);
- Promptly inform the hierarchy if they have received or used confidential or proprietary information about our competitors and of which they or third parties are the rightful owners;
- Gather competitive information only by legal means and, in doing so, by always clearly identifying themselves as Collaborators of BILHI Genetics;
- Never allow new Collaborators, hired by BILHI Genetics, to provide us with confidential information about competitors for whom they were previously working.

Confidentiality relationship with health

When we collaborate with health professionals, we place great importance on acting ethically, with honesty and integrity, in accordance with the laws and with respect for their independence.

When we enter into partnerships with medical laboratories, or when we collaborate with health professionals at expert meetings, congresses or symposia, our relationships are always focused on the prevention, the well-being of patients or the effective use of genetic testing.

We are committed to respecting national and international regulations regarding the publication of our links of interest with health professionals.

We provide ethical promotion and communication to health professionals, in compliance with applicable regulations. We strive to promote our predictive tools in accordance with their validated use by certified organisations.

We take the utmost care to always provide up-to-date, accurate, objective information supported by solid, reliable and sufficiently comprehensive evidence to ensure the proper use of our predictive software and genetic testing.

We have a regulatory monitoring process adapted to the evolution of the in-vitro diagnostic medical device market, meeting the quality requirement of regulatory bodies.

- Our software is CE certified;
- We apply the necessary guidelines and our Quality Management System internally.

IN PRACTICE, Collaborators must ensure to:

- Act with honesty and integrity in accordance with the applicable regulations and the total independence of health professionals in the exercise of their art;
- Always respect, in the context of collaborations or scientific events, the reasonableness of hospitality in accordance with local regulations that may apply;
- Ensure that only clear and unambiguous, rigorous, balanced and substantiated promotional material is produced in accordance with local regulations and validated according to the internal procedures in force;
- Comply with current good promotional practices, especially in terms of promotional items given to health professionals;
- Observe the regulations in place regarding the delivery of samples.