



# GENFIT

## BUSINESS PARTNER

### CODE OF CONDUCT

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## GENFIT COMMITMENT

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GENFIT is a biopharmaceutical company committed to improving the lives of patients with severe liver diseases who have a significant unmet medical need. Engaging in the discovery and the development of innovative therapeutic and diagnostic solutions is not only a great privilege but also a great responsibility. True to its commitment to generate a positive social, societal, and environmental impact, GENFIT conducts business with ethics and integrity towards patients, healthcare professionals, payers, policymakers, competitors, partners, shareholders, and employees.

As a signatory of the [10 principles of the United Nations Global Compact](#), GENFIT promotes and respects Human Rights within its operations and sphere of influence. GENFIT is also a member of the European Federation of Pharmaceutical Industries and Associations (EFPIA) to contribute to reduce inequalities in health, accelerate patients' access to innovative medicines and improve patient safety.

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## GENFIT EXPECTATIONS FOR BUSINESS PARTNERS

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GENFIT recognizes that its Business Partners play an important role in GENFIT's success and commitments. Accordingly, our company strives to conduct business with individuals and organizations who share GENFIT's commitment to ethical culture and operate in a socially and environmentally responsible manner.

Business Partners are understood as suppliers, distributors, commercial partners, and all other third parties entering or maintaining any business-related relationship with GENFIT.

This expectation also applies to third parties with whom the Business Partners work to provide goods and services to GENFIT.

Business Partners are expected to train their employees and use a management system to:

- **Implement and comply with this Code of Conduct;**
- **Comply with all applicable international and national laws and regulations;**
- **Maintain adequate procedures, trainings, controls, and necessary documentation to demonstrate their commitment to compliance and ethical culture.**

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## USE OF THE BUSINESS PARTNER CODE OF CONDUCT

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This Business Partner Code of Conduct documents principles and expectations for establishing and maintaining a business relationship with Business Partners.

GENFIT reserves the right not to enter into or to discontinue a relationship with a Business Partner whose practices would not meet its business ethics principles and/or would not comply with all applicable laws and regulations.

With this in mind, GENFIT may therefore engage in activities to confirm compliance with this Code of Conduct, such as on-site facility assessments, use of questionnaires, audits/information reviews or other measures necessary. Such activity demonstrates the commitment of both parties to quality, transparency and ethical business conduct, and helps to build trust.

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## 1 HUMAN RIGHTS AND LABOR

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***Business Partners shall uphold the human rights of workers and treat workers with dignity and respect. They are expected to comply with international human rights treaties (with the International Labor Organization), without prejudice to more favorable national laws.***

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### – Child Labor and Young Workers

Business Partners shall not engage or support any forms of child labor, not employ a person under the age of 15 (or under the legal age for finishing compulsory schooling) or person under the age of 18 for hazardous and night work.

### – Free Chosen Employment

Business Partners shall not use forced, bonded, or indentured labor, involuntary prison labor or human trafficking. Employees have the right to enter into employment voluntarily and freely.

Employees have the right to freely terminate employment at any time without the threat of penalty, by means of reasonable notice.

### – Non-Violence, Non-Discrimination and Fair Treatment

Business Partners shall provide a workplace free from discrimination and harassment. They shall not subject workers to inhumane treatment such as sexual harassment or corporal punishment. They shall ensure equal opportunity and treatment of all employees in recruitment, employment, development, and career advancement, providing equal opportunities based on fair, transparent and objective criteria.

### – Wages, Benefits and Work Hours

Business Partners shall pay workers according to applicable wage laws, including minimum wage, overtime hours and mandated benefits. Business Partners shall clearly and promptly communicate on the basis on which workers are paid. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the express permission of the affected worker.

### – Freedom of Expression and Association

Business Partners shall respect the right for employees to communicate, raise concerns about working conditions, and to establish and join a trade union of their own choice, in compliance with applicable laws and regulations.

### – Privacy and Data Protection

Business Partners shall respect individuals in a manner consistent with the rights to privacy and data protection. They shall take reasonable precautions to protect personal information against loss, theft, misuse, unauthorized access, disclosure, alteration, or destruction.

## 2 HEALTH AND SAFETY

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***Business Partners shall provide a safe and healthy working environment for their employees and the public. They shall comply with applicable workplace safety laws, regulations, policies, and “Environment, Health and Safety” (EHS) standards and, in particular, the following aspects:***

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### – Workers’ Health and Safety

Business Partners shall protect workers from overexposure to chemicals, biological and physical hazards, and physically demanding tasks in the workplace and in any company-provided living quarters. Business Partners shall have programs in place to prevent or mitigate catastrophic incidents associated with operations and processes. Such programs shall be commensurate with the facility's risk level. Business Partners shall ensure access to clean toilet facilities and to drinking water, and, if appropriate, sanitary facilities for food storage shall be provided.

### – Hazard Information and Safety

Business Partners shall make available safety information relating to hazardous materials in the workplace, including pharmaceutical compounds and pharmaceutical intermediates materials, to educate, train and protect workers and others from hazards.

### – Emergency and Preparedness

Business Partners shall identify and assess emergency situations in the workplace and any company-provided living quarters and minimize their impact through prevention and by implementing emergency plans and response procedures.

## 3 ENVIRONMENT

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***Business Partners shall operate in an environmentally responsible and efficient manner in all aspects of their business. They shall have appropriate management systems in place to effectively manage environmental risks.***

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### - Compliance with Laws and Regulations

Business Partners shall comply with all applicable environmental regulations.

All required environmental permits, licenses, information registrations and restrictions shall be obtained, and operational and reporting requirements followed.

### - Natural Resources Conservation

Business Partners shall conserve natural resources and engage in activities aimed at reducing water usage, energy consumption and greenhouse gas emissions. Business Partners shall have systems in place to quantify the amount of water used, energy consumed, and greenhouse gases emitted by their operations.

### - Waste Management

Business Partners shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater, or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to their release into the environment.

### - Spillage and Accidental Release

Business Partners shall have systems in place to prevent and mitigate spillage and accidental release into the environment.

### - Environmental Reporting

In order to enable GENFIT to comply with its current and/or future obligations to measure and publish non-financial information, in particular as regards the environment and the climate, Business Partners undertake to measure, and then communicate annually at their own expense to GENFIT, the environmental impact relating to the performance of the services and in particular the greenhouse gas emissions resulting from delivery of the services. The measurement of these emissions shall comply with the Greenhouse Gas Protocol methodology and shall cover at least Scope 1 and 2.

## 4 ETHICS AND BUSINESS INTEGRITY

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***Business Partners shall comply with all applicable laws and regulations in all aspects of their activities from research, through supply chain and manufacturing, to access to the patients.***

***They shall interact transparently and in accordance with applicable legislation with healthcare professionals and organizations, patients and patients' organizations, policy makers and payers.***

***They shall conduct their business in an ethical manner, act with integrity and maintain processes and procedures to prevent, detect and remediate non-ethical practices.***

***Management systems should be in place to fight fraud, corruption, tax evasion and money laundering.***

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### - Product Safety and Quality

Business Partners involved in the supply, manufacturing, packaging, testing, storage and distribution of materials/products on behalf of GENFIT will ensure compliance with applicable Quality Regulations, Good Manufacturing Practices (GMPs) and Good Laboratory Practices (GLPs) for the markets in which the products are registered and distributed. Documentation or data relevant to activities performed must be original, accurate, legible, controlled, retrievable, and safe from intentional or unintentional manipulation or loss. Business Partners will comply with all record retention requirements set by local regulators, as well as those specified in any Quality Agreement with GENFIT.

### - Clinical Trials

Business Partners involved in clinical trials on behalf of GENFIT shall ensure compliance with all applicable regulatory requirements in the countries where clinical trials are conducted and where GENFIT's products are marketed, registered, or distributed. Partners must respect and adhere to relevant guidance on Good Clinical Practices (GCPs) issued by national and local regulatory authorities. Business Partners managing the clinical trials shall provide full visibility to GENFIT of any subcontracted clinical trial activities.

### - Animal Welfare

Animals shall be treated respectfully, minimising the pain and stress related to the experiments. Animal testing should be performed after consideration to replace animals, reduce the number of animals used or refine procedures to minimize distress. Alternatives should be used whenever scientifically valid and acceptable to regulators.

– **Responsible Product Promotion**

All marketing and promotional materials and activities shall conform to high ethical, medical, and scientific standards, and comply with all applicable laws and regulations. When engaged with healthcare professionals, patients or animal healthcare professionals, all Business Partners should adhere to relevant industry standards of conduct that apply, such as those of the European Federation of Pharmaceutical Industries & Associations (EFPIA).

– **Interaction with Government Officials**

Any relationship between Business Partners and public officials must be in strict compliance with the rules and regulations to which they are subject. Any benefit conveyed to a public official shall be fully transparent, properly documented, and accounted for.

– **Confidential Information and Intellectual Property Protection**

Business Partners shall safeguard and make proper use of GENFIT's intellectual property and confidential information, including any personal information collected, stored, or processed for or from GENFIT, and act to prevent its loss, misuse, theft, improper access, disclosure or alteration. They shall obtain GENFIT approval before communicating or disclosing externally any information related to GENFIT.

– **Insider Trading**

Business Partners shall not use or share non-public information about GENFIT. Buying or selling securities of the company while being aware of such non-public information which could impact an investment decision is considered as "insider trading" and therefore illegal. Non-public information which could impact an investment decision may include clinical trial data, corporate strategies, mergers and acquisitions, strategic contracts, court cases or changes to GENFIT's top management.

– **Conflicts of Interest**

Business Partners shall avoid situations that present or may create the appearance of a conflict between their interests and those of GENFIT. They shall avoid interactions with any GENFIT employee that might conflict, or appear to conflict, with that employee acting in the best interests of GENFIT. Business Partners shall declare any conflict of interest that may affect the performance of tasks or provision of services entrusted to them by GENFIT.

– **Gifts and Entertainment**

Business Partners' employees are not allowed to accept or offer any gifts, invitations to a meal or social, cultural, sporting or hospitality event that may compromise their independence or judgment regarding a third party or that otherwise may be considered as, or reasonably appear to be, inappropriate.

– **Fair Competition**

Business Partners shall conduct their business in fair and vigorous competition and in compliance with applicable antitrust laws. Business Partners shall employ fair business practices including accurate and truthful advertising.

– **Compliance with Trade Controls Regulation**

Business Partners must comply with all applicable import and export controls, sanctions, and other trade compliance laws in the country(ies) where transaction(s) occur.

– **Fight Against Corruption**

Business Partners shall not accept, offer or give, directly, or indirectly through third parties, anything of value to any person or organization, whether public officials or not, to obtain or retain any undue advantage. Business Partners shall comply with all applicable international and national laws, regulations and codes that prohibit any form of corruption. This commitment must be extended to the third parties to whom they may subcontract all or part of their tasks or services for GENFIT.

– **Information Disclosure**

Business Partners must accurately record and disclose information regarding their business activities, financial situation and performance in accordance with applicable laws and regulations. Business Partners must keep financial books and records in accordance with applicable legal, regulatory and fiscal requirements and follow accepted accounting practices.

## 5 IT & OT SECURITY

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***Business Partners shall manage and operate their activities in a safe and secure manner in accordance with IT (Information Technology) and OT (Operational Technology) security best practices to ensure business continuity and protection of GENFIT assets from a confidentiality, integrity, availability and traceability perspective.***

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– **Security Governance**

Business Partner Senior Executives shall be actively committed and involved in security governance and allocate proper funding and resources to achieve their security objectives.

- **Robust Security Framework**

Business Partners shall develop effective security processes, procedures, and standards, in line with applicable laws and regulations.

- **IT and OT Security Standards**

Business Partners shall demonstrate commitment to cyber security standards. Compliance with security policies shall be regularly audited. Corrective measures shall be followed up and continuous improvement enforced.

- **Security Training**

Business Partners shall provide appropriate security training to their staff to ensure awareness of and adherence to security policies.

- **Secure Supply Chain**

Business Partners shall ensure that their own suppliers meet security requirements. Business Partners must provide safe and secure products, software, services, and materials according to requirements specified by GENFIT.

- **Manufacturing Operations and R&D Sites**

Business Partners shall comply with OT security and formally document all aspects of security controls during the implementation of production equipment or any system upgrades.

- **Cyber Response and Recovery Processes**

Business Partners shall have systems and processes in place to detect, prevent and mitigate potential outages in the event of a major cyber incident to the environment that could directly or indirectly jeopardize GENFIT assets, data, or operations. Backup and restoration procedures must be in place for all GxP and non GxP systems. Where relevant, security incidents must be reported to authorities and/or GENFIT.

## **6 REPORTING CONCERNS**

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***Business Partners who believe that a GENFIT employee, or anyone acting on behalf of GENFIT, has engaged in illegal or otherwise improper conduct, should report the matter promptly to GENFIT.***

***Any individual or organization who knows or suspects that a GENFIT Business Partner, or anyone acting on its behalf, has engaged in activities that violate GENFIT's Business Partner Code of Conduct, should speak up at <https://genfit.alertcenter-ikarian.eu> to report the concern to GENFIT through this portal.***

***The information submitted through this portal will only be received by the specific individuals in the GENFIT Legal & Compliance Department entrusted with the management of alerts.***

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