



Procedure for Professional Alerts

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GENERAL:

What is the purpose of this escalation procedure?	<p>This procedure has been established by bioMérieux to allow its collaborators and contractors to report any violation of the laws and policies, including but not limited to, topics such as a violation of the bioMérieux Code of Conduct, fraud, a serious threat to the public interest, a crime, any violation of human rights and fundamental freedoms, human health and safety, and the environment, resulting from bioMérieux activities or the activities of its partners.</p> 
Why is it important to have a system to collect reports and concerns?	<p>bioMérieux encourages a culture of openness where employees can feel comfortable raising concerns. This openness is essential for an effective Compliance Program. Without it, problems go unreported and uncorrected and may trigger negative consequences for individuals and the company. This alert system allows you to easily voice your concerns when you see a potential issue, so we can help resolve problems.</p> <p>We are counting on you to help us maintain the best ethics and Compliance Program possible. You are "on the ground" and in the best position to prevent actions that are inconsistent with the laws and regulations and the bioMérieux Code of Conduct.</p> 
Who can report?	<p>This reporting system has been created for all employees, temporary workers, and third parties of bioMérieux.</p> 
What should I report?	<p>Your honest communication makes bioMérieux a better place to work for all of us. We count on you to alert us on activities that violate laws or regulations, and other serious misconduct.</p> <p>The goal of this escalation procedure is to alert the right contacts within bioMérieux for:</p> <ul style="list-style-type: none">• a crime or a serious violation of international agreements, the law, a regulation, or a serious threat to the public interest, or• risks or serious violations of human rights and fundamental freedoms, human health and safety, and the environment, resulting from bioMérieux activities or the activities of its partners, or• any violation of the bioMérieux Code of Conduct. <p>This could include, among other things: corruption, conflicts of interest*, external fraud**, money laundering, health and safety concerns, discrimination or harassment, and anticompetitive activities.</p> <p>You should report information that is objective, that you personally know about and in good faith. Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true.</p> <p>bioMérieux prohibits its employees from retaliating against someone for making a report in good faith, even if the report later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated.</p> <p><i>*Please note that you can disclose any potential conflicts of interest that you have, in accordance with the 037212 Conflicts of Interest Policy.</i></p> <p><i>**If you are reporting external fraud, be aware that there is a special procedure for reporting, External Fraud Management Policy.</i></p> 
I am aware of some individuals involved in unethical conduct, but it doesn't affect me. Why should I report it?	<p>Our company chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.</p> 





<p>I am not sure if what I have observed or heard is a violation of company policy or involves unethical conduct, but it just does not look right to me. What should I do?</p>	<p>File a report. We prefer that you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you were not sure.</p> 
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MAKING A REPORT:

<p>If I have a concern, who should I talk to?</p>	<p>In general, you can bring your concerns about a particular situation to your direct manager or other member of our management team. The manager may refer any matter to the Ethics & Compliance Department, who will treat it with the highest diligence.</p> <p>We recognize, however, that there may be circumstances when you are not comfortable reporting the issue to management. In that case, you should send the alert to Ethics & Compliance. The members of the Ethics & Compliance Department are trained on managing issues confidentially and in accordance with the laws.</p> <p>Please note that, in general, to benefit from applicable whistleblower laws, you must address your concerns directly to the Ethics & Compliance Department. Please see below, the special section on Loi Sapin II for employees and temporary workers in France.</p> <p>Managers may not in any way discourage employees from taking concerns or complaints to the proper channels, including Ethics & Compliance, Human Resources, or Legal.</p> <p>For employees and temporary workers in France: under the Sapin II law, anyone wishing to report a concern described above may report to the "regulator" (i.e., any administrative or judicial authority or the professional orders), if the alert has not been processed within a "reasonable" deadline by the Ethics & Compliance Department.</p> <p>If, subsequently, the alert has not been processed by the regulator itself within 3 months, the reporter has the option to make the contents of the alert public. In exceptional cases where there is a serious and imminent danger or the risk of irreversible damage, it is possible to bring the alert directly to the appropriate regulator.</p> 
<p>How do I make a report?</p>	<p>Reports may be directed to the Ethics & Compliance Department through one of the methods below to ensure that your report is treated confidentially and managed correctly.</p> <p>You can send an email to Compliance_Officer@biomerieux.com or use the EthicsLine (by phone or online), operated by NAVEX Global, Inc. on the EthicsPoint platform accessible on bioMérieux's intranet, under "Tools & Apps"</p> <p>With the EthicsLine, you have the ability to file a confidential report by phone or online through an independent third party service managed by NAVEX Global, Inc. You may report in your language.</p> <p>By phone: Click here to access the list of phone numbers by country.</p> <p>Online: Go to www.ethicspoint.com and choose "file a report." Enter "bioMérieux" into the search box and choose "select." You can then choose your country on the drop down menu on the right.</p> 


<p>Should I identify myself?</p>	<p>We recognize that sometimes employees may not feel comfortable identifying themselves when submitting a report. However, please be assured that the information provided by you, including your identity, will be treated confidentially at every step of the process. By identifying yourself, we can more efficiently communicate with you to address your concerns.</p> <p>Should you decide to report the claim anonymously, your claim shall be treated with the same degree of care and diligence, provided you gave sufficient detailed information to conduct the investigation or that you remain reachable through the anonymous communication tool integrated into the EthicsLine system to answer any questions.</p> <p>Please note, however, that we cannot treat cases submitted by anonymous reporters in some countries unless the individual provides sufficient information to prove a serious violation of laws or international commitments. In these countries, you will not be able to choose the “anonymous” option in the EthicsLine system.</p> 
<p>What information should I provide?</p>	<p>Please provide any objective facts that you are personally aware of or have personally seen.</p> <p>Provide any documentation that you have or information about where further documentation can be found. Files of all types can be uploaded to the EthicsLine online portal. You can also provide information and files directly to the Ethics & Compliance department.</p> <p>In general, we need your identity (please see “Should I identify myself?”), a detailed description of the facts, dates when misconduct occurred, names of anyone involved, supporting documents, etc.</p> <p>Without sufficient information, we cannot fully investigate your concern and the report may be closed due to lack of information and no further action will be taken.</p> 
<p>What kinds of personal information will be collected and processed?</p>	<p>When you make a report to the Ethics & Compliance Department, either through the Compliance_Officer@biomerieux.com email or through the EthicsLine, Ethics & Compliance will create a report containing any information that you provide. As mentioned above, this report and any personal data you communicate to us are stored in an external database. This database is hosted and managed by NAVEX Global on behalf of bioMérieux. All investigation communications will be maintained in this system.</p> <p>Please see the Data Privacy Consent Form for more information. Prior to submitting your report, you will be requested to acknowledge this form.</p> 
<p>Can I really be anonymous?</p>	<p>EthicsPoint is contractually committed not to pursue a reporter's identity. In fact, EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.</p> 
<p>Is the EthicsLine phone option confidential?</p>	<p>Yes. You will be asked to provide the same information that you would provide in an Internet-based report and a physical interviewer will type your responses into the EthicsPoint website. These reports have the same security and confidentiality measures applied to them during delivery as the online portal.</p> 

WHAT HAPPENS AFTER YOUR REPORT TO ETHICS & COMPLIANCE?

Where do these reports go?	<p>Reports emailed to Compliance_Officer@biomerieux.com go directly to the Ethics & Compliance Department through bioMérieux's normal email system.</p> <p>Reports entered directly through the EthicsLine are made available by NAVEX Global only to specific individuals within the Ethics & Compliance Department at bioMérieux.</p> <p>For the reports through the EthicsLine, you will first receive an automatically-generated e-mail confirming your report has been received.</p> <p>Within 48 hours, you will receive a second e-mail from the Ethics & Compliance Department confirming your report is under review, and, if needed, requesting additional information, such that a thorough investigation may be conducted.</p> <p>Please note that any communications with the Ethics & Compliance Department shall be made with you:</p> <ul style="list-style-type: none">• via e-mail, if you provided your e-mail address, or• on the EthicsPoint platform using the access key provided to you when you submitted the case, in the event you chose to report the claim anonymously or not to communicate your e-mail address. 
Who can access the report?	<p>The Ethics & Compliance Department keeps the identities of individuals (the reporter and any implicated persons) and the information contained in the report confidential. When necessary to conduct investigations or take corrective actions, we may include a small group of other bioMérieux individuals or external experts to help us obtain information or analyze facts.</p> <p>We avoid involving your direct management or others who may be implicated in any way in the report to prevent any conflicts of interest.</p> <p>The members of the Ethics & Compliance Department are subject to a greater obligation of confidentiality. All external or internal persons who have knowledge of the details of the report are also subject to an obligation of enhanced confidentiality.</p> <p>Annually, the Global Compliance Committee reviews an anonymized report of the overall trends of cases, such as the topics reported, geographic trends, methods of report intake, etc.</p> 
Will the person that was involved in my report find out that I filed a report?	<p>In line with applicable laws, all people involved in a report to the Ethics & Compliance Department are informed at the appropriate time that an alert affecting him/her has been initiated. However, the Ethics & Compliance Department shall not communicate to him/her the reporter's identity, which shall be kept confidential. However, the person involved in your report will have the right to correct any information that has been supplied and potentially to defend him/herself during the investigation.</p> 
What happens to my reports?	<p>As appropriate, the company will conduct a prompt and thorough investigation, which may include interviewing you and other witnesses, collecting and reviewing relevant documents, and consulting internal persons or outside counsel. See "Where do these reports go? Who can access the report?"</p> <p>Your report and information related to its treatment will be kept for the time allowed under applicable laws.</p> 

<p>How to follow up the investigation and communicate with the investigator?</p>	<p>When you file a report through the EthicsLine, you receive a unique user name and are asked to create a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to follow up on the investigation status, answer any questions asked by the Ethics & Compliance Department, or add more details that may help resolve open issues. We strongly suggest that you regularly login or call back in the time specified in the confirmation email (usually three working days) to answer any company questions that may have been posted.</p> <p>Please go to the EthicsLine website found on bioMérieux's intranet, under "Tools & Apps" and click on "follow up on my report".</p> 
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WHISTLEBLOWER LAWS

<p>Who may be covered by whistleblower laws?</p>	<p>These laws are highly specific, and can vary not only by country, but by regulatory agency. The guidance below is general and does not intend to be legal advice. However, we want to alert you that you may have special rights under your local laws, if you report something that could be a violation of laws.</p> <p>In order to benefit from these protections, many countries require you to go to a designated internal resource to make a report before submitting the concern to a government authority. At bioMérieux, the Ethics & Compliance Department is the designated resource and reports should be submitted as described above.</p> 
<p>What protections do these whistleblower laws provide?</p>	<p>It depends on the laws applicable in the country where you live. For example, in France, the company must:</p> <ul style="list-style-type: none"> - protect the identity of the reporter, the persons implicated in the report, and the information collected. - not discriminate or retaliate against the reporter in any way for making the report or refusing to violate any laws. <p>Please note, even where this is not required by law, bioMérieux has a strong policy prohibiting retaliation by any bioMérieux employees against a reporter and protecting the confidentiality of any persons involved in a report.</p> <p>In addition, some governments (like France) may hold such reporters criminally irresponsible or give them credit for the disclosure at sentencing.</p> <p>However, in any case, all reports must be made objectively and in good faith. Any employee who, in bad faith, accuses someone by communicating false, misleading or malicious information may incur disciplinary and / or civil and criminal liability (in accordance with local laws).</p> <p>In addition, please note that a reporter who makes any disclosures of protected information or documents covered by national defense secrecy, medical secrecy or the secrecy of relations between a lawyer and his client, are generally not eligible for whistleblower protection.</p> 