



Code of Conduct



MÉRIEUX NUTRISCIENCES

COMPLIANCE POLICY

EXTERNAL COMMUNICATION

(May 2021 – V.1)

1. OBJECTIVES

This Compliance Policy aims at providing guidelines on when and how information and data owned by the Company or by our customers, clients and business partners could be used for any external communication.

Improper, or unauthorized, use of such data in external communications may have serious consequences in the business relationship with our stakeholders, our reputation and may even result in potential legal liability.

The guidelines provided by this policy shall be taken into account together with those contained in the **Confidentiality Policy** (covering the protection of the Company's confidential and sensitive information) and the **Intellectual Property Rights Policy** (covering the protection of the Company's intellectual property rights).

This External Communication policy applies to all employees of the Company. It is the responsibility of managers to share these guidelines and recommendations with all employees of the Company.

2. DEFINITIONS

Confidential Information is non-public proprietary information, whether in visual, oral, paper, or electronic form, trade secrets, know-how, materials, tests results, contract research results and/or data related either to the Company or to a third party in relationship with the Company.

External Communication means any presentations, posters, articles, reports, webinars, social media posts, press releases, moderating of virtual meetings, sharing of news and marketing materials, declarations to public Authorities written in the name of Mérieux NutriSciences and broadcasted outside Mérieux NutriSciences to any third party including journalists, public officers or regulatory authorities.

Intellectual Property Rights/IP Rights means either trademarks and/or copyrights and/or know-how and trade secrets and/or patents.

Personal Scientific Communication means any public communication (including on social media) done by an employee on his behalf and without naming Mérieux NutriSciences, on scientific topics linked directly or indirectly to the activities of Mérieux NutriSciences.

Stakeholder means any client, customer, business partner of the Company and, more generally, any public or private organization (including accreditation bodies, universities, R&D centers, etc.) involved in the Company business operations.

3. GENERAL GUIDELINES APPLICABLE TO ANY EXTERNAL COMMUNICATION

Keep your direct manager informed

- Your manager must be prior informed of any External Communication project;
- Share also with her/him any third party feedback, questions related to the External Communication.

Be cautious in your statements

- Any statement based on abusive or provocative interpretation, exaggeration or simplification of facts must be avoided.
- Be cautious not to refer to adverse health effects of emerging risks "as if proven". Communications on scientific topics shall provide the different perspectives identified by the scientific community as well as identified uncertainties.
- **No verbal or written exchange during any potential or already existing crisis situation shall be done with any external party without prior specific authorization from the Legal Affairs department.**

Stay in your fields of expertise

- Avoid speaking on matters outside of your fields of expertise.
- Everyone must be careful not to answer questions or make statements that fall under somebody else's responsibility. This will prevent conflicts and reputation pitfalls.

Do not over communicate on services under development

- Any communication on new capabilities or new service offerings being developed by the Company must be checked with the team, lab or country leading the project.
- Information on technical aspects of new services provided or discussed with customers cannot be included in any External Communication without the prior consent of the related customer.

Disclose your sources and copyrights

- Any communication using third-party data must disclose the source of information and the existence of copyrights if any.

Respect the Company's graphic charter

- Always use the templates available on MXNS Connect to prepare communication material using the Mérieux NutriSciences' graphical charter.

In case of doubt on the content of any External Communication, please contact your manager and/or the Corporate Communication Department for preliminary review.

4. EXTERNAL COMMUNICATION INVOLVING THIRD PARTY'S DATA

No data owned or provided by our Stakeholders can be used in any External Communication without the prior consent of the relevant stakeholders.

The prior written approval of the Company's Stakeholder will in particular be required for any use in any external communication of :

- **Confidential Information and in particular know-how owned by a Stakeholder or jointly developed between the Company and a Stakeholder;**
- **IP Rights owned by a Stakeholder, including the Stakeholder's name, logos or services & product's visuals or tradenames;**
- **information on services provided to customers;**
- **assessment made by customers on the quality of the Company's services.**

If permission requested from a Stakeholder is rejected, the contemplated external communication must be cancelled.

5. MEDIA COMMUNICATION

Any verbal or written exchange with the press or any other media regarding the Company must be validated and prepared with the Corporate Communication Department.

The same rule shall apply for the participation of any public event or publication using the name of the Company or information related to its activities. The Corporate Communication Department will then assess whether the event or publication is consistent with the Mérieux NutriSciences' communication strategy and respectful of our Stakeholders' rights.

6. PERSONAL SCIENTIFIC COMMUNICATION

For any Personal Scientific Communication, the employee shall ensure that there will be no breach of his confidentiality obligations towards Mérieux NutriSciences.

Employees must inform her/his manager before any Personal Scientific Communication in relation to the activities of the Company, consisting in articles/interviews she/he intends to participate in and provide her/him with its content prior to its publication.

The Employee shall sign such communication on her/his behalf, making it clear that she/he is sharing her/his opinion only and not that of the Company. It is preferable to use one's personal email address for social networks accounts.

She/he shall not take part in controversial online discussions that could relate to Mérieux NutriSciences or its activities.

If noticing fake news or any content that may be detrimental to Mérieux NutriSciences, she/he shall notify the Corporate Communication Department directly.

7. SANCTION STATEMENT

Failure to comply with the requirements of this Policy or its procedures will result in disciplinary action up to and including termination of employment.

8. RAISING QUESTIONS OR REPORTING IDENTIFIED RISKS

This Policy does not address every situation you may encounter at work. If there is a situation that you think may pose a risk and you are unsure about how to handle it, you should seek guidance. Support is available to you from the Corporate Communication Department or the Legal Affairs Department.

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