



CODE OF ETHICS

CVO-EUROPE

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PREFACE



CVO-CYBERCONSEIL was built around strong values which have always guided us. These values have shaped our culture and developed our reputation.

For the Group to develop, it must demonstrate unwavering commitment to combining performance and integrity while respecting our values.

We are developing new activities and expanding into new territories to achieve a sustained growth rate while building a reputation for complying with laws, current guidelines and the ethics of our profession.

This reputation is being built and consolidated day by day. We owe it to all those of us who are prepared to take the necessary decisions and measures, to those who constantly strive to achieve this high level of trust.

For this reason I wish to ask all staff of the Group to personally commit to respecting our code of ethics, focused on the essential criteria of integrity. We all need to comply with these rules as a team.

To preserve our growing reputation, improve the trust our clients place in us and achieve sustainable growth, we must base our performance on a policy of integrity and on the values of the Group.

By adopting strong values and upholding high ethical standards we will more than ever be an exemplary group, a company that inspires trust and respect from all. »

Jérôme Tomaselli, President

OUR CODE OF ETHICS

This code of ethics describes the principles of behavior and professionalism our Group refers to. These recommendations serve as a reference for all operational and functional departments of the company. This code of ethics has been circulated to all employees of the Group.

The values the Group upholds are the following:

Client Service

- + Ensure the satisfaction of our clients by listening and exceeding expectations
- + Provide services with high added value to our clients
- + Search for innovating solutions to meet our clients' objectives

Quality

- + Quality in all our work, producing accurate results within the deadlines set
- + Utilize the most appropriate technologies and methods
- + Constantly strive to improve or adjust our processes to offer the very best

Skills and Team Spirit

- + Employ talented and skilled teams
- + Invest in training and create attractive career opportunities
- + Recognize and praise exceptional performance

Integrity

- + Adopt ethical behavior in all of our activities
- + Act in respect of our clients and teams
- + Contribute towards the protection of the environment and natural resources

BEHAVIOUR OUTSIDE THE GROUP

Legal compliance

The Group's personnel comply with the laws of all countries in which we operate. The Group must pay particular attention to this point as awareness and understanding of the law can sometimes be difficult in very different cultural and legal settings from those the personnel are used to working in. When in doubt, the employee shall immediately seek guidance from his or her line manager or legal department. The Group's personnel shall be guided by integrity, honesty and transparency when exercising their professional activities. When dealing with clients, suppliers and other business partners, employees must act in the interest of the Group and in compliance with laws and regulations. All personnel must pay particular attention to comply with laws governing competition, control of exports and re-exports, work and employment, safety, health and protection of the environment.

Good professional practice

Zero tolerance for corruption,

CVO-CYBERCONSEIL, its companies and employees do not tolerate any form of corruption, whether active or passive, direct or indirect, in favor of players in the public or private sector. The Group's companies shall respect all international anti-corruption conventions and the anti-corruption laws in force in the countries where they operate. In no event shall the Group, its companies or its employees use a third party to conduct activities that the code of ethics or the law prevents them from carrying out themselves. Engaging the services of a business partner for the purpose of corrupting a natural or legal person is an offence under the terms of anti-corruption laws. Before entering into any contractual relationship with a business partner, the Group's companies shall carry out a methodical and documented selection process.

Fair competition

The Group supports fair competition and strictly complies with competition laws in the countries where it conducts business. As a general rule, these laws forbid agreements or interference that might restrain or limit competition or trade. These include price fixing, bid rigging, carving up markets, territories and clients between competitors as well as boycotting or providing unequal treatment to certain clients or suppliers without legal justification. Exchanging or disclosing sensitive business information concerning competitors, clients or suppliers may also constitute a breach of applicable competition laws.

Gifts and gratuities

Gratuities, such as gifts and invitations, granted or received from customers, suppliers or other business partners have no other purpose than to strengthen the brand image and maintain

good trade relations. Their value, however, must remain symbolic and they must not influence or appear to influence a business decision. Good judgement, discretion and caution must be heeded at all times in these situations. Gift giving between businesses is prohibited by law under certain circumstances and in some countries. The Group's employees must abide by the applicable rules and guidelines in each country where CVO-CYBERCONSEIL operates. The activity of the Group, concerning principally patient safety, does not tolerate any compromise, for any reason. If at any time an employee is unsure of a situation, he or she shall immediately seek guidance from his or her manager or quality manager.

Behavior towards clients

All Group employees must respect the principles of loyalty and integrity regarding clients.

Relationships with shareholders

The Group ensures that its shareholders simultaneously receive relevant, exact, accurate and true information transmitted to them as soon as possible and which is consistent with previous publications. It is attentive to the implementation of international principles and recommendations on corporate governance.

Relationship with suppliers

The Group selects its suppliers on the basis of objective criteria and demands a high standard of performance from them so that it can fully meet its expectations and those of its clients. The Group shall not do business with suppliers that use child labor or forced labor.

Integrity

Group employees shall not harm the Group's reputation or compromise the integrity of its assets and information systems. Income-generating activities conducted outside the Group must be free of conflicts of interest with

functions performed within the Group. Similarly, utmost caution must be taken concerning the acquisition of shares, either directly or through third parties, in companies that have a business relationship with the Group. Such restrictions do not apply to listed companies, with the exception of the use of privileged information, which is insider trading.

Sustainable development

Today, more than ever, protecting the environment is an essential mission for all Group employees.

Political and religious activities

The Group does not finance any political parties and any political activities shall only be conducted outside of the workplace and of working hours. Any religious practices of employees shall also be conducted only outside of the workplace and working hours, barring any legal obligation.

BEHAVIOR INSIDE THE GROUP

Information management

Each employee shall ensure the protection of information received in the course of performing their duties. He or she shall particularly respect the internal rules governing both written and verbal communications.

Protection of the confidentiality of certain information

Each person has access to confidential information which constitutes an important asset for the Group. Whether confidential or secret, this sensitive information may not be disclosed or communicated outside of the Group. Similarly, employees with potential information concerning any of the Group's clients shall take care to ensure the protection of such information from third parties.

Respect for individuals

The health and safety of all is an essential objective of the Group. The Group provides equal opportunities to all its employees. Recruitment and promotions are based solely on professional abilities and results. The Group respects the dignity and rights to privacy of each individual. Furthermore, one of the Group's core values is to create the conditions for each individual to realize their full potential in their chosen profession.

Compliance with the code of ethics

Employees are required to familiarize themselves with the content of the code of ethics and to comply with it. Should there be any uncertainty or doubt with regards to conduct, each employee shall immediately consult his or her management or the Group's legal department. Each employee has an obligation to respect this code of ethics.

OUR COMMITMENT: RESPECT

Our **Quality Department** is committed to the satisfaction of our clients



OUR COMMITMENT : INTERPERSONAL



