



## Code of Conduct & Ethics

***“OUR REMIT IS FOR BIOMARKER SOLUTIONS GROUP TO BE A VALUED AND COMMITTED SOURCE OF ACCESS AND QUALITY, DEVELOPED BY EMPOWERING TRUST IN THE WAY WE DO BUSINESS WORLDWIDE.”***

Our business is focused on making the most meaningful difference to patient health primarily through great diagnostics and associated services.

Our remit has been in place from inception, and we continue to maintain it as we move forward and generate new avenues of activities not only in the diagnostics market but also in associated services related to health in general. This offers challenges, but also new horizons and interpretations that we strive to align to our principles and remain aware not to lose sight of our fundamental commitment to understanding that not only what we do is important, but how we do it is just as important.

We expect all within our organisation, and those that interact with it to do the right thing, to be upstanding, be diligent, ethical, display integrity offer quality and in doing so gain trust. In supporting these morals, we will continue to make efforts to enlighten, educate, motivate and eventually empower all to understand the common ethics and goals of such.

In fostering such activities and beliefs we aim to ensure that wherever and in whichever situation BioMarker Solutions is confronted, it holds these principles and is seen to do so by gaining the trust of all current and future Stakeholders. This we believe will ensure that we can maintain growth and development of our business model, but also impact favourably on the field in general.

The BioMarker Solutions Code of Conduct is our set of basic guidelines that will enable us and our stakeholders to understand how our ethical values can be translated into consistent actions worldwide. This applies internally, and externally with all actions and activities we are currently employed with, but also in all future activities in which we wish to participate. Application and development of this code should be entwined into our daily activities and offer a framework of action and direction for our behaviour focused on offering value and trust to our stakeholders and society in general, but also enlighten our understanding that our place within and our physical working environments make us proud.

## BMSG Code of Conduct/Ethics

BioMarker Solutions Group Ltd requires all members of the group, its directors, employees and contractors to observe the highest standards of honesty and integrity with all individuals and organisations wherever and in whichever form they interact. We promote care in all actions, empower diligence and fairness in all activities and apply ethics and manner which embraces best practices with all our stakeholders.

As such we shall all comply with this Code of Conduct/Ethics, its supporting policies and endeavour to strengthen such by adoption of new and or reviewing, updating and developing codes in support of the laws and regulations of all countries in which we operate and with all applicable national and international codes.

### Our core values

**Accuracy:** Working in a challenging big data environment, meta-data and systems accuracy together with educational and general B2B activities deserve accurate metrics, approaches, transfer and support and logistics. Together with the other principles, trust with our stakeholders starts and encompasses each of our actions highlighted through our daily activities and our pro-active business development.

**Ethical standards:** In treating individuals appropriately, respectfully, with dignity, with trust, with honesty they too will be reciprocated with similar ethical standards. These principles of citizenship extend from personal relationships, across B2B and also intrinsically within all actions and processes that BMSG employees, contractors and business partners undertake on a day-to-day basis.

**Individuality:** In respecting core ethical standards we support human rights, the right to privacy and above all confidentiality. We abide by international equal opportunity policies, are non-discriminatory in offering continuous education and support, irrelevant of any factor, concentrating only on the individual's improvement in society, their working environment, their health and the good will of all our stakeholders and the wider community.

**Integrity:** We understand that a basic commonality is integrity of service. This includes being a consistent and dependable business partner, one that listens and responds to expectations, complaints, advice, and doing so appropriately in good faith. BMSG will also refrain from conducting business that it believes could infringe upon any of its basic principles. We strive to be an integrous entity through implementation of values that are congruent with and evident in our words, actions, personality and everyday practices.

**Quality:** Is a point of remit for BMSG to deliver and search for procedural improvements that impact upon quality; this equally applies to service provision as it does to product development, manufacturing and our

relationships within the group but also with all interactions with all stakeholders.

**Reliability:** BMSG considers this intrinsic to its activities at the bench, on the road and with all its stakeholders across all its actions and activities.

**Transparency:** BMSG will provide stakeholders with relevant, accurate and timely information of and for necessary actions and activities. Such transparency also impacts upon the other principles, empowering a clean and clear set of interactions and actions both internally but also externally.

### Applying the code

Our business activities impact upon many sectors of the community including physicians, employees, regulators, partners, individuals and other stakeholders who are involved in the healthcare sector and beyond. Maintaining the trust and confidence of these groups means ensuring that our high-level values are translated into consistent and appropriate behaviour worldwide.

All stakeholders within our reach should have access to and be aware of our code of conduct/ethics and how they are affected and involved with it, in doing so guidance should simply and holistically indicate what is required to be aware of, and how all should conduct their activities in accordance with this Code. The code highlights what is applicable, the laws and regulations of the countries in which we work and do business, and how to pay attention to the standards required by the various authorities.

All individuals within the BMSG should be aware of the requirements of this Code, its implications for the individual and all activities that they are directly or indirectly involved in. It is imperative that all have access to it and have been appropriately trained in its values and application across all activities of our business, be aware of any associated and supporting policies, laws and regulations in the country and or region that they are active, and more importantly how to effectively apply these in daily practice. Empowering training of this code as a mandatory module reinforces our remit to our seven basic principles of trust, transparency, reliability, integrity, accuracy, individuality and our ethical standards that are evident in all our actions and activities. In support of these there are 22 major standards, set out herein, supported by a set of procedures enriched and available for all our workforce globally.

In withholding from the Code, acting outside of its scope, not aligning with compliant items in workflows, actions, activities, duties, responsibilities, by delegation or otherwise BMSG could suffer substantial harm of its reputation and possible financial consequences, including the imposition of criminal and/or civil fines and other penalties

The following sections of this Code outline BMSGs core commitments (and principles), what they mean and how they should be actively implemented at all levels within and beyond the Company.

You are expected to exercise good judgement and common sense in deciding the right actions to take in any situation you confront as this Code and our supporting policies cannot cover every situation that may arise; yet apply its spirit to those situations. You should ask questions if you are unclear about any aspect of this Code, or if you are not sure how to respond to an issue that the Code does not address.

You must also promptly report any known, suspected or observed violations of laws, regulations, or this Code or any supporting policies of which you become aware.

As we hold our partners, vendors, supply chain and all stakeholders in view of this code and its principles, they too are expected to function on behalf of BMSG applying the same spirit set out herein.

BMSG is committed to only working with contractors, such as suppliers, joint venture or co-promotion partners, and research or licensing partners, who embrace standards of ethical behaviour that are consistent with our own.

BMSG is committed to market, sell, promote, research, develop, provide information about, and advertise the products and services it commercialises in all countries and regions in full compliance with relevant laws and regulations.

### Who Is Covered Under the Code

It does not matter where you work or what you do for the Company – you have a responsibility to use good judgment and follow our Code. That includes every full-time or part-time employee at every level of the Company, all the way up to the executive suite. The Code also applies to controlled subsidiaries and entities in which the Company either owns a majority interest or manages operations (all of the above are referred to throughout this Code as “the Company”).

All employees, and any others subject to the Code, must acknowledge that they have read and agree to uphold the Code. Anyone who works on the Company’s behalf (including suppliers, consultants and other business partners) must share our commitment to integrity by following the principles of our Code when providing goods and services to the Company or acting on our behalf. Suppliers, as a condition of working with us, must comply with our Supplier Code of Business Conduct and our Supplier Guiding Principles.

### Upholding the Law

Laws and regulations can vary widely from country to country. Because our Company is incorporated in the United Kingdom, our employees around the world often are subject to UK law in addition to the laws of the country where they work. Because we operate in over a dozen countries, knowing which laws to follow can be complicated, so be sure you know the laws and regulations related to your job in the country (or countries) where you do business. Sometimes local customs or practices can conflict with our Code or the law. In cases like these, ask for advice and assistance.

## Your Rights as an Employee

While we expect you to follow our Code, we also recognize your rights as a Company employee. For example, you have the right to speak publicly about matters of public concern or to participate in certain activities related to the terms and conditions of your employment (including discussions about wages, hours, working conditions, health hazards and safety issues). Nothing in this Code or in any Company policy is intended to limit or interfere with your rights under the law.

### When a Code Violation Occurs

When one of our employees fails to follow our Code or applicable laws, ignores someone else’s failure to follow the Code or pressures someone else to violate the Code, a violation may have occurred. This can harm the Company’s reputation and our bottom line. We take all potential Code violations seriously. Code violations may lead to disciplinary action that matches the nature and circumstances of the violation, up to and including suspension without pay, loss of merit increases or annual incentives, and termination of employment. If an act violates the law, it could result in fines or criminal prosecution. Code violations are also documented in your employee record. The Company has other policies and processes governing performance, conduct and behaviour. Policy violations that are not Code violations will be handled under the appropriate policy or procedure.

### What You Need to Do:

- As employees, each of us has as a responsibility to ‘Know and live the Code’.
- Read it and follow it, along with any other policies that apply to your job.
- Think before you act.
- Use good judgment, being honest and ethical in every action you take.
- If you are asked to violate the Code, do not do it. Report the concern as soon as possible using the resources available to you.
- Follow the law. Understand laws that apply to your job and our business. If you are ever unclear about a law or regulation, contact Company legal counsel.
- Ask for help. When an answer is not clear, ask for guidance before taking action.
- Stay alert. Pay close attention to any activity that is inconsistent with our Code, our policies or the law.
- Raise concerns. Do not ignore a violation. Prevent harm to our Company and its reputation by reporting your concerns immediately.

### **If you are a manager, you have additional responsibilities:**

- Model the Code and our values. Promote a culture of integrity by making ethical decisions and showing honesty and integrity in everything you say and do.

- Never encourage or direct any employee to achieve a business result at the expense of violating our Code or the law.
- Talk about the Code.
- Read the Code and understand it. Refer to it, make ethics conversations part of your routine.
- Be informed. Recognize that you may not always find the answers that you need in the Code, so know where to go for answers when there are questions.
- Expect the best. Discuss the importance of ethics and compliance and let employees know you expect them to always do what is right.
- Be responsive and create a “speak up” culture. Encourage employees to come to you with questions or concerns. Listen to them carefully and offer guidance when they need help, including identifying available resources for reporting. Also, be careful not to create an environment where employees feel they can only bring concerns to local management.
- Take action. Look out for misconduct and report it to your manager.

### How to Make Good Decisions

Doing what is right is our goal. If the right thing to do is not clear, ask yourself:

- ✓ Is it consistent with our Code?
- ✓ Is it legal?
- ✓ Does it follow our policies?
- ✓ Does it benefit the Company as a whole – not just a certain individual or group?
- ✓ Would I be comfortable if my actions were made public?

If you can answer “YES” to all of these questions, the action is probably okay. But any “no” or even “maybe” answers are a signal to stop and get advice or ask questions. After all, it is always better to ask before you act, especially when you are not sure.

### Anti-Slavery

BMSG does not condone slavery, in any form, at any time, and has procedures set in place to offer insight across all its activities with all stakeholders in the identification of any possible action construed to fall under this categorisation. We have a no-tolerance to slavery policy (SOP610v1); this includes forced labour, child labour, human trafficking, supply of false documentation in any of the company’s activities, or supply chains.

### Anti-Trust laws and competition

In our efforts to drive the success of our business, we must only seek competitive advantage through lawful means.

We must not act in ways that stifle the free market, and we must not exchange information or enter into agreements or understandings with competitors, customers, suppliers or other third parties in a way that improperly influences research and development activities, manufacturing, marketing, sales, distribution or employee compensation practices, or involves bid-

rigging, falsification (or other manipulation) of information, price-fixing or boycotts.

If we have a dominant or monopoly position, competition laws may impose a special responsibility on the Company not to abuse that position to keep out competitors or to exploit customers.

We must only engage in dialogue with our competitors when there is a legitimate business reason to do so.

These are also the expectations for those companies that we offer and contract for services.

### Avoiding conflicts of interest

We must never accept anything of value, if it would constitute either an inducement to make, or a reward for making, any decision favourable to the interests of a third party.

We must not accept gifts or hospitality that may compromise our independence or judgement regarding a third party. This includes hospitality or entertainment with a value that exceeds locally established limits, that is not customary or that is otherwise likely to be seen as inappropriate.

Whilst we are free to make personal financial investments and to maintain social relationships with people, we meet through business activities, our business relationships must not create any interests that may conflict, or have the potential to conflict.

Conflicts of interest can also apply to internal communication channels, or activities and duties, or simply as a result of an ethical dilemma. These are also considered and contemplated under our code of employment ethics and can be confronted with the unbiased support of our employees.

### Bribery and corruption

Simply; neither is tolerated.

We must not offer or give money or anything else of value either as an inducement to make, or as a reward for making, any decision favourable to the interests of BMSG.

This includes providing such benefits to government officials (including those from national and local governments and those serving in public international organisations) and other healthcare professionals and organisations, patients, suppliers, charities and patient groups, whether companies or individuals.

BMSG does not permit agents, contractors, advisors or other third parties working on our behalf to engage in this type of conduct.

As well as not offering bribes, we must also not accept them, refrain from dealing with individuals and or organisations that we have evidence (or in cases in which we believe) undertake such activities.

### Communications, disclosures and records

All our communications, through whatever channel, must be fair, accurate, timely and appropriately authorised. All employees must be mindful of situations



in which they may be perceived to be communicating on the Company's behalf.

BMSG policy is to disclose information in a timely manner, compliant with all relevant legal and regulatory requirements. All such disclosures must be accurate and not misleading, with no material omissions. BMSG must maintain proper Company books and records to provide an accurate picture of our business activities and financial position. We must not falsify or inappropriately alter Company records, and we must only destroy records in accordance with relevant supporting policies.

Client confidentiality stands at the centre of our communications and information gathering, storage, release, and destruction; and therefore, must be handled at all times in an appropriate manner as per the various supporting policies and documents that we have in place for maintaining confidentiality and security.

We must not predict or project sales or turn-over artificially, and only rely upon solid data to prepare assessment reviews in order to understand performance.

### **Community support, donations and patient group support**

BMSG is committed to making positive contributions to our local communities through charitable contributions, sponsorships and other initiatives; responds to humanitarian appeals with financial and/or product donations, where there is a demonstrated public health need; and supports the work of patient groups, through the provision of financial and in-kind assistance that seeks to enhance patient welfare.

In offering services such as PSP and consultation or marker access our teams come in contact and interact in ways that could be construed as infringements of this code. We take great care and consideration in 'due diligence' associated with all our activities that could impinge upon wrongdoing, and concentrate on those that ultimately award benefit to the individual and/or community specifically related to improving the well-being of individuals and or 'improving health' in general.

### **Customers and suppliers**

BMSG views both customers and suppliers as distinct pillars within its business model. They will, as all stakeholders, be treated fairly, with diligence and respect and in as transparent a manner as possible, subject to confidentiality and competitive policy. We advocate partnership models with all our suppliers and customers as this offers both long-term stability and reliability whilst building trust to tackle and adapt to the changing environment and challenges that we face. BMSG also instils co-operation and diligence which enable and promote market access, improve quality of services for all, and promotion of innovation and R&D partnerships.

BMSG engages in free and fair competition and has a low tolerance for others seeking a competitive advantage through collusion, obstruction, sanctions,

restrictive trade practices, monopolisation and other activities that lead to improperly influencing business decisions. We aim to only engage with customers and suppliers that are like minded, maintain a tough ethical stance on many activities that damage honesty, fairness and free trade. These also include appropriate employment policies, respectfulness of human rights, confidentiality, trust, integrity, and transparency; all of which are scrutinized through procedures such as 'due diligence'.

### **Employment principles**

BMSG values the diversity of skills and abilities that a global workforce brings to our business. We are committed to supporting diversity in our workforce, in our leadership and to developing all the talent within our organisation.

All decisions about recruitment, hiring, compensation, development and promotion are made solely on the basis of a person's ability, experience, behaviour, work performance and demonstrated potential in relation to the needs of the position in a fair and transparent manner. All employees' and all interviewees are screened in a fair yet diligent manner, supported by local regulations and laws taking into account all principles of this code regarding remuneration, compensation and rights for legal and ethical employment or contractual services under the umbrella of BMSG.

### **Ethics**

There are several different aspects to Ethics encompassing a system of moral principles. We at BMSG believe that all our actions and activities should follow one or more of the following components of standard ethical behaviour, and this Code and our policies should bare these in mind at all times. It is also worth noting that Ethics might be perceived and implemented slightly differently due to other circumstances such as societal, governmental or legal interpretation; and therefore, all parts of our Code need to be abridged and interpreted in good will with these basics being taken into consideration in all actions and activities that we are involved in.

Attributes that we believe are central to good ethics include an understanding, acceptance and implementation of: Integrity, Objectivity, Impartiality, Confidentiality, Beneficence, Justice, Autonomy, Non-Maleficence, Professional behaviour, Professional competence, and Truthfulness on behalf of the BMSG by all its employees, managers, directors, and contractors, at all times and in all situations.

### **Health, safety & environment**

BMSG is aware and constantly monitoring existing and emerging risks to the environment associated with our infrastructure, procedures and processes, as well as to the health and safety of our employees and others who visit or work on our premises; we also look beyond this

to our clients and communities with whom we do business in and in which we operate.

We go beyond legal minimums to proactively reduce the potential for exposure to chemical, biological, physical and other hazards in the workplace; reduce the risk of other accidents in our diagnostic, research and manufacturing facilities; promote safe driving, promote a smoke free environment, and help our staff to manage their health and wellbeing.

We also aim to promptly and effectively respond to, investigate and share learning from incidents that resulted in, or had the potential to result in, serious illness or injury or environmental harm, and to take any appropriate corrective action promptly.

We are also taking into consideration the environment, are investigating ways to operate more sustainably, reduce impact upon the environment, minimise waste and resource consumption.

Everyone is expected to integrate safety, health and environmental considerations into their day-to-day work activities. Management has a duty to provide their teams with safe and secure business environments, including building awareness of potential health and safety risks and how they should be managed.

## Impartiality

BMSG firmly believes in the integrity of its actions, and impartiality lies at its heart. The ability of individuals, companies, organisations and authorities to maintain integrity in their services, activities and education are paramount in maintaining objectivity in order to allow for transparency, trust, and fairness to be evident. Objectivity is an essential component to all our actions, it is typically reliant upon all stakeholders to maintain such objectivity in their actions and likewise be respected and supported by non-discriminatory, anti-corruption, anti-bribery, and other interwoven policies and actions such as audit, review, accreditation, certification, and risk assessment to identify layers or hurdles imposed through non-compliance with impartiality. BMSG expects all relevant stakeholders to acknowledge impartiality, wherever and whenever they encounter it, and together with BMSG circumvent and restore objective procedures and policies that support this and their code of conduct and code of ethics.

## Information about our products and services

BMSG is committed to offering the most reliable services to our clients whether they be individuals or multi-nationals. Our product and service portfolios are routinely changing, and diversifying, and this in itself causes challenges in communications to our client base, which is also diversifying. In order to maintain clarity in our objectives, which are offering the best in all our activities, BMSG has prioritized three objectives in communication. Irrespective of the format of such communication, verbal, hard copy or IT based (telecommunications) we must communicate

information accurately, effectively and in a proper/ethical manner.

The information we provide to support the safe use of our products and services, whether through publications and promotional materials or in response to enquiries received, must be supported by scientific evidence and approved through the Company's established review and approval procedures. We must only promote licensed products and only for their approved uses.

Our communications and marketing practices worldwide must meet or exceed the minimum standards set by applicable laws, regulations and codes.

## Inherent rights

BMSG is a firm believe in what are classed as inherent and tangible rights both of entities (such as companies, organisations, states and nations), but most importantly individuals. Without all our employees and our stakeholder's offerings and commitment(s) to the Company our entity would not exist to support ourselves and our clients. This is inherently formed on a basis of trust through ethical and **integrity** business practices. Harnessing the ability of the company to develop and grow its IP, whilst securing the safety and security of its employees and itself demands a commitment to freedom of speech. Not only our Code, but also the rights of all individuals and entities that BMSG interacts with must have the right to speak freely when they are confronted with an item or article that is either not legally or ethically acceptable to our Code; or indeed their personal Code.

In light of this BMSG fully accepts that any person who believes that they or others have been subject to unlawful discrimination, harassment, identifies or is confronted by any otherwise illegal or unethical activity within or beyond the company (relative to its stakeholders) is obliged to report the incident and circumstances to their manager, or senior management, who will arrange for the incident to be investigated appropriately, anonymously (or not), and impartially, without retaliation in any form (SOP630v1).

## Insider trading and confidential information

We must not use any non-public information about BMSG or other companies learnt through our employment to influence our, or anyone else's, decision to purchase or sell securities; that is to secure personal profit in a non-competitive manner.

This requirement applies even after a person has finished working for BMSG.

Confidential information should be protected from improper disclosure, or abuse, and any authorised communication of confidential information should be limited to individuals who have a demonstrated and documented "right to know", and "need to know".

## Interacting with healthcare professionals and organisations

All our interactions with healthcare professionals and organisations must be intended to ensure the effective utilisation of our services that impinge upon patient care; including medical research, knowledge or practice management, or in gathering necessary feedback about our services.

We must only engage the services of healthcare professionals and organisations when they are legitimately necessary, and we must not pay more than an appropriate market rate for the services rendered.

We must not enter into business relationships or offer or provide gifts, hospitality or anything else of value, to induce or reward favourable decisions about our products and services.

We must always provide information about our products and services to healthcare professionals and organisations in accordance with the relevant provisions of this Code and supporting policies, inclusive of the Profession Conduct Policy (SOP611v1).

## Private Personnel, Patient and Client Safety (PPPC)

As our core business is diagnostics followed by PSP, CRO activities and manufacturing we consider Private Personnel, Patient and Client Safety across all our activities an absolute priority. Safety and efficacy along with sensitivity, specificity, traceability, accountability and security are core considerations throughout and beyond our procedures.

We work within a regulated environment for both diagnostics, but also virtually across all our other activities. Our workflows include clinicians, prescribers, national health systems, pharmaceutical companies, diagnostic developers, individuals, patient care and support workers and as such we are privileged to personal privileged information (PPI), biological material(s) and other confidential data and materials. Apart from raising awareness of the sensitivity of these items we are also cautious and pro-active in all processes in the patient supply (especially diagnostic's) chain as our activities, products and services might constitute part of patient treatment and management decisional tools. For these reasons we adopt and integrate all processes into our ISO and quality management systems.

All stages of each different process, inclusive of clinical diagnostics, patient support programs, clinical consultations, R&D, storage, logistics, educational activities, through to manufacturing are conducted in accordance with all applicable internal and external standards; and in applying local and national regulations and laws where and as required.

We are also functioning in accordance with all major accreditation schemes, act as a reference laboratory for a Global EQA provider, and support best practice, consultation, education and lobbying in molecular pathology, and other associated health-based activities.

## Procurement

Service and material supply and provision are integral to all companies. As BMSG is also actively conducting service provision and product manufacture, it needs to be fully compliant with all the legal, ethical and socially responsible safeguards related to its operations, and procurement is a major component of this. Our policies and practices, operational audits and daily activities are reliant upon such, as is our integrity, security and sustainability. In light of this we look upon procurement as a central activity, and spend a high percentage of our resources on making sure that it is conducted in a transparent, fair, accountable, cost effective, reputable and ethical manner regardless of the volume, frequency or risk associated with it. As this, these activities affect all BMSG's representatives, all are actively involved at some point(s) in these activities and are fully aware of the consequences of inappropriate decisions and their knock-on effects within the company. As per our commitment to due-diligence we also expect that all our stakeholders, supply chains and other parties to adopt likewise policies and procedures as we do with respect to procurement.

## Protecting company property and resources

The Company's property, assets and other resources; including, knowledge, procedures, IP, know-how, strategy, collaborations and partnerships and such are vital to the continuity and longevity of the company and its employees.

As such we must ensure that our property, information systems and resources are protected and kept secure at all times from unauthorised use, damage, loss, disclosure, diversion or removal, whether through accident, improper act, breach of trust or other risks such as environmental extremes.

Everyone has responsibility for protecting the Company's electronic systems, communications network, computing resources, hardware and software, data, biological materials, infrastructure, collaborations, good will, professionalism, etc; as well as preserving the integrity and confidentiality of Company information, resources and assets.

Your safety and security, like that of your colleagues, families and friends, should also encompass the company. We view the company as an independent entity, and individual, one part of the team and as such this code of conduct and all its principles are equally valid in confronting and supporting the entity 'BMSG'. Only by being a team player can you and BMSG develop.

## Protecting personal information

Several of our activities collect, use and retain personal information. We consciously mandate the, collection, use and retention of only as much privileged personal information (PPI) as we need for legitimate activities in accordance with appropriate laws and regulations. Where required by law, we must also obtain appropriate

consent to such collection and use, and inform individuals about the purposes for which their personal information may be used. Similarly, we are regulated by the GDPR for all data security, access, storage, utilisation, release and destruction of such activities applicable to our world-wide activities, raising the compliance bar above several countries and nations current policies.

PPI also applies to biological specimens and associated meta-data related to these material sources, their maintenance, storage, security, environmental and health related safety aspects, implications, transfer, utilisation and destruction. Here we function in a highly regulated environment requiring several operational ISO's, participation in external audit and support educational activities in order to generate a team with multidisciplinary knowledge and scope across several fields of medicine, pathology, science, and ethics.

We must only share personal information with affiliates and third parties on a legitimate need to know basis, and only if we are reasonably assured that they will suitably safeguard the information once it is in their hands, or if required by law.

We must give also special consideration to any additional applicable requirements before sensitive personal information is collected or used, or where information is transferred or processed outside its country of origin, because it may become subject to different laws with different or competing requirements.

## Protecting personal welfare

As part of our overall Employment Principles, those of PPC safety and other relative protective measures encompassed by our code we are committed to supporting a healthy environment for individuals to 'Shine' and in doing so encourage others. We have a no tolerance code (SOP620v1) applying to (but not limited to): harassment, discrimination, abuse, child labour, corruption, bribery, bullying, slavery of any form, violence; and furthermore, we expect our suppliers, partners, contractors and other stakeholders to understand and accept these attributes.

In supporting these values and safeguarding employee rights, being compliant with local laws and regulations, promoting transparent employment and review policies for advancement, for listening to employee critique we aim to develop a harmonious working environment that improves moral and stabilizes our company's future.

Discrimination and/or harassment (in any shape or form) of any BMSG employee, or anyone with whom we do business, is simply: Unacceptable.

Any person who believes that they or others have been subject to unlawful discrimination or harassment should report the incident and circumstances to their manager, or senior management, who will arrange for the incident to be investigated appropriately, anonymously (or not), without retaliation in any form, and impartially (SOP630v1).

## Public policy & political activities

Employees and others who, on BMSG behalf, engage in dialogue with governments and other public bodies to inform upon (or influence) public policy must ensure that all communications are based on facts and evidence and are not misleading or open to misinterpretation. People engaged in these activities must always make it clear that they represent BMSG view(s), uphold this code of conduct in all its relative measures.

We must not use, or consent to the use of, any of our corporate funds, resources or facilities to support a governmental entity, political organisation, party or candidate, except where permitted by law and where acceptable as part of local custom and practice with respect to government/industry engagement. This includes support for policy advocacy organisations, such as certain patient support groups.

No political contribution should be made which, by its scale or affiliation, might be seen as excessive or inappropriate.

Likewise, NO contribution should be made to any individual or organisation in a patient management flow, i.e., in any activity that could lead to a treatment-based decision, or be in conflict with this code.

## Research and development

Empowering novel and streamlined diagnostics through innovation, requires resourceful high-quality science to be conducted with passion and high-ethical standards.

R&D is often considered an open door to innovation, however, we at BMSG consider that any innovation must take into consideration on the basis of practicality, user functionality, clinical benefit (either observed or unobserved) yet still follows ethical and compliant routes for implementation.

Compliance with relevant laws and regulations governing research and development underpins BMSG's own standards.

Compliance concerns are typically related to ensuring that those taking part in research (clinical, translational or other) anywhere in the world are not exposed to unnecessary risks, that they understand the nature and purpose of the research, that proper procedures for gaining informed consent are followed and that appropriate confidentiality rules are applied as per this code.

All information from clinically related research must be recorded, handled and stored in a way that complies with applicable data protection laws, and enables accurate and transparent reporting, interpretation and verification.

All research proposals must be ethically and scientifically reviewed in line with current laws and regulations, and all relevant internal review and approval procedures must be followed.

## Social Responsibility

BMSG recognises the overall responsibilities of its actions. As we are principally involved in the Health-Sector we are constantly faced with additional challenges in our operations that can impact directly



with individuals. Further to this is our responsibility to the entire societal structure through our offerings, actions and also our commercial operations that must take into account the items embedded in this code, but also be fully aware, and transparently aware of how our activities impact upon the individual; and society alike. Our commitment is as indicated herein, to be transparent, objective, protective, impartial, legal and ethical. As such we bare a responsibility to the environment and society that is best supported by each and every BMSG representative. Our policies, training and ethos need to be aware and responsive to our activities and their consequences. Factoring in mechanisms that view and review these are actively sought and enacted by BMSG.

## Trade controls

We must comply with trade regulations and restrictions if they have been approved by recognised national and international authorities, including the United Nations, the European Union, the United Kingdom, Sweden and the United States.

We must not comply with other boycotts or trade restrictions.

We must obtain necessary licences for the import and export of our products and other items, and we must provide accurate, truthful information about our products to Customs authorities.

## Definitions

- Applicable codes refer to those codes that BMSG has formally adopted, or with which it is otherwise obliged to comply.
- BioMarker Solutions, BMSG, the Group, the Company, we, us and our, refer to BioMarker Solutions Ltd and its consolidated entities, including BioMarker Solutions Egypt Ltd, B to C Limited (Algeria), BioMarker Solutions Morocco Limited, Mosaic Diagnostics Limited, BioPath Innovations SA.
- Confidential information refers to any and all confidential and/or proprietary information or material belonging to or in the possession of any member of the BMSG. It may be oral, visual, in writing, in the form of or contained in materials, or in any other form. It includes any information or material in any way related to BioMarker Solutions (a) financial information, business plans, projections or strategies, property, business practices and relationships, processes, systems, methods of operation or marketing plans, (b) research, development or other investigative activities, (c) regulatory practices, procedures or policies, (d) products, specifications, formulae, ingredients, pricing policies, marketing plans, product costs or promotional activities, (e) customer, supplier or employee information or agreements, (f) medical, scientific or other technical information, (g) corporate, strategic, commercial, licence or other agreements or (h) inventions, innovations, improvements, know-how, trade secrets or other proprietary information or (i) biorepository and associated meta data.
- Contractor refers to any supplier or other third party with whom or which BMSG has a contract.
- Healthcare professionals and organisations refer to any persons who or which may prescribe, administer, recommend, purchase, pay for, reimburse, authorise, approve or supply any product or service sold or provided by BMSG. It includes:
  - any members of the medical, dental, pathology, pharmacy, nursing professions, scientists of relevant professions, or relevant associated administrative staff; and/or
  - hospitals and other care organisations, health insurers (including managed care organisations), pharmaceutical companies, diagnostic centres (of any kind), pharmacies, and formulary or benefit administrators, and relevant staff at such entities.
- Material refers to information that would be considered influential in making a decision to buy or sell securities.

- Person refers to any natural person (i.e. an individual) or legal person (e.g. a company).

- Supplier refers to any person providing BMSG with goods or services, including vendors and consultants.

- Supporting policies refers to any and all Company policies, codes, standards and procedures.

This Code of Conduct applies to all full- and part-time, BMSG directors, officers, contractors and employees worldwide. It requires compliance with all laws and regulatory requirements and applicable codes, as well as our own high ethical standards, as outlined in this Code and supporting policies.

## Questions and concerns

You may at some time come across a situation that appears to violate a BMSG policy. Everyone has a duty to report any suspected violation promptly and appropriately.

In general, you should first seek to address your concerns with your manager. If you believe this is not appropriate, you may also contact our CEO, or Lawyer. BMSG facilitates a non-retaliation policy.

If you prefer to contact someone outside your team, you may use any of the following contacts:

WEBSITE – located within the Client System is ‘Notify BMS Ethics’, a single Chat room with our Lawyer.

POSTAL ADDRESS: BioMarker Solutions ‘Legal’, 20-21 Wolsey Mews, London NW52DX, UK.

If the concern relates to accounting, internal accounting controls or auditing matters, you should contact our Lawyer, or alternatively our CEO.

In all instances, every effort will be made to ensure that information relating to a reported violation is kept confidential and communicated on a need-to-know basis only.

The above procedure(s) can also be followed if you have a question, or are seeking clarification about any aspect of this Code and its supporting policies.

Our Lawyer is not an employee of BMSG, and acts as a third party on BMSGs behalf. When you ask a question or raise a concern, you will be asked to provide details and whether you wish to disclose your contact information. BioMarker Solutions Ltd may record this information in a database (maintained and accessed solely by our Lawyer) who may contact you for further information. You have a right of subject access to the personal information BMSG processes about you.