



Code of Conduct



The objective of Crossject is to save patients' lives in emergencies. Thanks to each one of its employees, our company has never, since its creation in 2001, stopped boldly persevering and innovating to accomplish its mission which is quite simply to save lives.

Having been listed on the Euronext Growth market since 2014 and with the imminent marketing of its first drugs based on Zeneo®, the time has now come for our company to state very clearly its values, its compliance with numerous regulations of all types and the measures it takes to ensure that it has the means to implement them correctly.

After internal consultation with stakeholders, Senior Management has therefore decided to include this Code of Conduct, which also sets the ethical behavior that must be consistently shown by each one of us, within the internal regulations in order to ensure that we put our values into practice on a daily basis.

Behaving ethically, in particular with regard to respecting the Universal Declaration of Human Rights, and complying with all regulations governing our activities, should be the objective of each and every one of us.

This is a key objective for Crossject and an integral part of each of our values, in order to ensure a consistent increase in the confidence in our company felt by:

- > **Patients and patient associations**
- > **Each of us as employees**
- > **Health professionals**
- > **Clients, suppliers, partners and competitors concurrents**
- > **Stockholders and investors**

***So, let us boldly
continue to persevere
and innovate together!***

Thank you, I know that I can count on you to promote our Code of Conduct, this guarantee of our growth and the achievement of our mission:
QUITE SIMPLY, TO SAVE.

Patrick Alexandre
Fondateur and Président of the Board of Management

SEPTEMBRE 2020

Patients and patient associations

What we do each day, we do first and foremost for patients in emergencies.

We are committed to pursuing quality Research and Development, in compliance with Best Laboratory Practice and Best Clinical Practice. In this context, we are particularly attentive to the well-being of animals and insist that our service provision partners comply with these requirements. The results of our clinical trials of drugs are made public and can be consulted online, in compliance with the regulations in force.

We are committed to manufacturing quality products, in compliance with Good Manufacturing Practice, and insist that our suppliers comply with the requirements applicable to them.

We are committed to promoting, selling and distributing our products in compliance with the guidelines and conditions of use described in the summary of the product's features, approved by the competent authority in the relevant country, and with the applicable regulations.

We are committed to communicating, to both patients and health authorities, information that is precise, correct and unbiased on the performance, reliability and safety of our products in the context of their approved guidelines.

We are committed to continuing to implement our CSR strategy in compliance with the principles we committed to by signing the Responsible Care Global Charter® edited by The International Council of Chemical Associations.

Each of us as employees

Equal treatment of employees and mutual respect are, and always will be, the foundations of our success. We share the same values and the same mission.

We promote a policy of equal opportunity based on diversity in employment and recruitment and reject any specific discrimination on the grounds of sex, skin color, religion, national origin, age and physical or mental handicap.

We promote mutual respect for all. Our interactions, whether they take place in person, in writing or electronically, are conducted in a professional and respectful manner. Harassment, of anyone and in any way whatsoever, is forbidden to every one of us. More specifically, behavior or talk that is threatening, violent or vulgar, and words or gestures that are intimidating or hostile, are forbidden. Such behavior is a criminal offense, punishable by law, and will not be tolerated.

We are mindful of the health, safety and well-being of our employees and other persons on our premises. In order to ensure a safe working environment, both on the company's premises and on any external site used for professional purposes, all employees are bound to notify their line manager as quickly as possible of any accident, injury or illness that occurs during work.

We endeavor to promote a policy of employee fulfillment and continuous improvement by supporting access to training and mobility, advocating constant dialog on employee needs and motivation, and by applying a fair and equitable remuneration policy.

We respect and carefully protect personal employee data to which we have access. We collect and use personal employee data only if we have a legitimate reason to do so for the purposes of employment administration and management. Our IT Charter includes policies that are implemented to promote the protection of personal employee data in the context of our activities. If you have any questions on this subject, please contact the Data Protection Delegate.

No employees should be exposed to situations in which there is a conflict of interest, either real or imagined, between their duties within the company and their personal or financial situation. If you have any doubts about the existence of a conflict of interest, please seek advice from your line manager or the Compliance and Ethics Manager.

Any corruption towards anyone is forbidden.

We are careful to protect the integrity of our products, patents and brands against counterfeiting, alteration, theft and misappropriation. All employees should notify their line manager without delay if they become aware of any such occurrence.

We wish to maintain an active and constructive social dialog, with the Economic and Social Committee and trade union(s) present in the company, in which different opinions may be expressed.

All employees should ensure that they comply with the company's objectives when using the company's confidential information, in particular on social networks, in order to avoid theft, damage or misappropriation of information by any person.



Health Professionals

Health professionals are our key point of contact with patients. We should respect them by requesting their intervention for legitimate needs in compliance with applicable law.

We do not offer unwarranted benefits to health professionals.

We maintain relations with health professionals and health organizations where necessary for legitimate scientific, technical or commercial needs and only in strict compliance with applicable laws. We are careful to ensure that relations are transparent, in particular by asking them to disclose any interest they may have in our company.

We collect, register and declare payments and other value transfers to our health professionals in compliance with legal provisions, in particular Act 2011-2012 of 29 December 2011, known as the Loi Bertrand.

Clients, Suppliers, Partners and Competitors

The quality of relations with our clients, suppliers and partners guarantees our growth and our future. Our competitors drive us forward.

We strive to interact with our clients, suppliers and partners in good faith and to comply with fair reciprocity, applicable law and the contracts that bind us.

We purchase our goods and services based solely on their quality, safety, price and the value they provide in relation to the competition. We expect those with whom we work to share our commitment to business integrity and loyalty.

We support an open, competitive market and challenge our competitors only in terms of the reliability and value of our products. We expect our competitors, in their dealings with us, to respect the same commitments as those in this Code of Conduct.

We comply with the laws relating to free competition and commercial practices. For this reason, we do not envisage and do not enter into (either in writing or orally) any unlawful

agreement with our competitors that might affect prices, costs or conditions of sale, assign markets or clients, unfairly restrict commercial transactions or exclude competitors, suppliers or clients from the market.

We respect the intellectual property of third parties and our competitors, and protect and defend our own intellectual property and confidential information.

We respect and carefully protect personal data to which we have access, whatever the source, subject matter, owner or purpose of this data. We process this data in compliance with the General Data Protection Regulation.

We refuse to pursue any business relationship with any person who will not comply with the key principles of our Code of Conduct, in particular with regard to anti-corruption measures.

Stockholders and Investors

The quality of our behavior, together with our scientific and commercial successes, ensures that our stockholders and investors are proud to be associated with us.

We are committed to ensuring that our stockholders and the public are provided with precise, reliable information on our activities by publishing our accounts, financial reports, annual reports and other documents required by law.

Our governance is compliant with applicable law.

Members of the Supervisory Board, the Board of Management and employees are forbidden from taking any action that could be described as “insider trading”, which is a criminal offense punishable under article L 465-1 of the Monetary and Financial Code.

The ambition of the Board of Management and the Supervisory Board is that Crossject should be an innovative company committed to ensuring compliance with its values and ethical principles.

Implementation of the Code of conduct

We are all responsible for the implementation of the principles cited in this Code of Conduct, which forms an integral part of our internal regulations.

If you have any questions, you should consult your line manager or another manager. The alert procedure can be used in the circumstances indicated below.

Our company’s President, members of the Board of Management and of the Supervisory Board, the Human Resources department and managers are bound to promote our values and a culture of compliance and, by showing their commitment to these principles, provide an example.

They must also clearly indicate the policies and other documents relating to the procedures that specifically affect the activities for which they are responsible and must ensure that employees under

their authority receive the training they need to carry out their work effectively and appropriately. They must be available to respond to questions and take note of potential infringements that are reported. If managers are aware of the potential infringement of a law, policy or procedure, they should report it to the Compliance and Ethics Manager.

All company directors and managers should encourage regular discussion of these principles and promote a working environment in which they are routinely taken into account in decision-making.

Alert procedure

In order to implement this alert procedure, all employees are encouraged to notify their line manager in good faith, or if this is impossible or the situation is delicate, notify the Compliance and Ethics Manager directly of any possible breach of this Code of Conduct. Line managers should refer the matter to the Compliance and Ethics Manager.

Line managers should refer the matter to the Compliance and Ethics Manager. responsableconformiteethique@crossject.com

When you do this, you will be asked to give your name (but you are not obliged to do so). If you do give your name, you cannot be subject to any disciplinary sanction.

Any dishonest notification will result in disciplinary measures being taken against the perpetrator.

The Compliance and Ethics Manager is obliged to treat your alert with diligence, impartiality and in confidence, on the principle of presumption of innocence. He or she may seek the assistance of any

person, within or outside the company, deemed necessary in the light of the nature of your notification. Rd de la nature de votre signalement.

Employees can always access information about themselves and can request corrections in the event of an error. The identity of the person making the notification cannot be disclosed by the company to the person who is the subject of the alert.



