

CODE OF ETHICS AND CONDUCT FOR EMPLOYEES

ACT WITH RESPECT AND INTEGRITY

Version 001-2021 / Auteur : Stéphanie Deltenre

This Code of Ethics and Conduct (hereafter the "Code") is an official document. It assembles the most common ethical principles and recommendations for professional conduct to be followed. These principles and recommendations are derived from national, European and international legal and regulatory frameworks. They coincide with our mission and values. As a general reference, this code is intended to provide guidance for behaviour and decision-making in our day-to-day activities. The principles and recommendations indicated here do not claim to be complete. Other more specific codes, charters and rules, which must also be respected, provide a more targeted framework for various activities of Forethix LLC.

This code applies to Forethix LLC as a company and to each employee of Forethix LLC regardless of his/her position or responsibility within the company. The terms "the company" and "we" refer to Forethix LLC, its management, its shareholders and its employees. Any breach of the principles and recommendations of this code may result in penalties. This code has been approved and may be reviewed periodically to ensure its adequacy with the evolution of the legal framework, the activities of the company, the environment in which the company operates or morals. Any changes to the code will be communicated.

1. ETHICS, PRINCIPLES OF CONDUCT AND RECOMMENDATIONS

Ethics deals with what is right and wrong, the moral obligations, principles and duties that govern an individual or a group. In the context of our business activities, we behave in accordance with the principles of conduct and the recommendations of this Code. On all occasions and in all places, regardless of our position within the company, we behave with respect and integrity, both towards our colleagues and our external stakeholders (customers, competitors, business partners, suppliers, etc.). We encourage our colleagues and external stakeholders to do the same.

2. REGULATORY AND NORMATIVE COMPLIANCE

Forethix LLC respects the Constitution, the national laws and regulations and subscribes to the standards of European and international law to which our country is bound by its commitments. Forethix LLC carries out its activities with respect of the laws and regulations which concern them. We respect the relevant laws and standards and ensure that they are respected by our colleagues and external stakeholders.

3. INTEGRITY, EQUALITY AND DIVERSITY

Forethix LLC considers as fundamental the respect of universal values and fundamental rights, in particular the Universal Declaration of Human Rights of the United Nations and the conventions of the International Labour Organization. Forethix LLC is committed to being a responsible employer, promoting a work environment based on equal opportunities, fair treatment and individual achievement. We ensure that the principles of equality, diversity and dignity are respected for all of us. We encourage our colleagues to do the same. We do not

practice or tolerate any form of discrimination (based on race, color, gender, age, disability, nationality, sexual orientation or other). The same applies to any form of harassment (physical or verbal behavior that is intimidating, humiliating or hostile). Gestures and comments with sexual connotations are strictly forbidden.

4. HEALTH AND SAFETY

Forethix LLC pays particularly attention to the working conditions of its employees and takes all reasonable measures to ensure a healthy and safe environment. In the context of our professional activities, we take care of our health and safety as well as that of our colleagues and external stakeholders (who visit us at our workplaces). While working, it is prohibited to be under the influence of alcohol, drugs or other illegal substances. Alcohol consumption is only tolerated at internal and external events organized by the company or its partners, and only in moderation. Smoking is not permitted inside the workplace.

5. TANGIBLE AND INTANGIBLE ASSETS

Forethix Sàrl protects its tangible and intangible assets. We protect the company's equipment, infrastructure and information systems as well as its intellectual property, including its brands and the know-how of its personnel. We use information technology (telephones, faxes, mobiles, printers, photocopiers, etc.), including access to the Internet, responsibly, primarily for business purposes. Under no circumstances do we use them for abusive or even illegal purposes that could harm the company's security or reputation.

6. PERSONAL & CONFIDENTIAL DATA

Forethix LLC respects the privacy of its employees. We protect the information and data of Forethix LLC, our own

and those of our colleagues and external stakeholders. This applies in particular to the strategic, financial and administrative data of the company as well as to the data of our customers (name, address, telephone number, e-mail address, account number, ...), both for their collection and for their use, including their treatment, their archiving and their communication to others. If in the course of our business activities we have access to confidential information, we strictly maintain this confidentiality by not disclosing it, either internally or to the public, nor using it for our own benefit.

7. CORRUPTION, CONFLICT OF INTEREST AND INSIDER TRADING

Forethix LLC has zero tolerance for any form of corruption. Accepting, making, promising, soliciting or offering directly or through an intermediary a good, a bribe³, a service or any other favor likely to influence a professional decision or to be perceived as being able to have such an influence is synonymous with corruption or attempted corruption. Even allegations of corruption can damage the company and its reputation. We do not tolerate insider trading⁴, fraud⁵ or money laundering⁶. Any gift received or offered must be reasonable, insignificant and symbolic, and in no way an influence to a business decision. We avoid conflicts between the company's interests and our personal interests and always place the company's interests before our personal interests.

8. MARKETS AND COMPETITION

On the market, Forethix LLC acts as a fair competitor. Mindful about our reputation, we respect our competitors and, with respect to them, we behave in accordance with the applicable laws and standards of competition. We make sure that they do the same towards Forethix LLC. We do not exchange in any form, orally or written, information about our customers, suppliers and business partners. In our professional decisions, including commercial ones, we behave in an objective and impartial way.

9. IMPACTS AND RISKS

Forethix LLC is a corporate citizen, contributing to the well-being of local communities and supporting the community involvement of its employees. By thinking today about future generations, Forethix LLC strives to limit the impacts and risks of its activities. In our daily work, we are aware of our influence on our colleagues and on our external stakeholders. As a responsible company,

- We promote the design and marketing of products and services that limit, if possible, the negative impacts of our activities.
- We use existing natural resources (water, electricity, etc.) in a responsible manner.
- We take care to prevent any form of risk to ourselves, our colleagues, the company and external stakeholders.

- We respect internal procedures and ask for the necessary authorizations before any major commitment.

10. COMMUNICATION

Forethix Sàrl advocates a responsible communication. We communicate with each other and with the outside world in a courteous and constructive manner. In the promotional field (advertising, sales, recruitment, etc.), we present ourselves in a factual, non-misleading manner. Communication on behalf of the company, both internally and externally, including with the press and on social networks, is the sole responsibility of the Marketing and Communication department or authorized persons.

11. RESPONSIBILITIES

It is the responsibility of each Forethix Sàrl employee to respect and contribute to the respect of the principles and recommendations of this Code. The following questions can help us to make the right decision and to act accordingly to this Code:

- are my professional actions possibly illegal?
- can I accept a gift that may influence my professional decision?
- could the health or safety of a colleague be endangered by my action?
- could my action possibly upset an external stakeholder?
- does my action potentially damage the company's reputation?

We strive to conduct ourselves with respect and integrity and report any actual or potential violations of the principles and recommendations of this Code by notifying: Stephanie Deltenre. No form of pressure or retaliation will be exercised against anyone who, in good faith, reports a problem with ethics or conduct. Information provided/received in the context of this Code is treated in the strictest confidence.

12. ACKNOWLEDGEMENT OF ACCEPTANCE

I have read and approved the present Code of conduct, and accept the commitment of this code without reservation as an employee of Forethix LLC:

Name of the employee
Signature
.....
Date
.....

³ A sum of money received or given illegally to someone in exchange for a service rendered.
⁴ Act of taking advantage of privileged information to obtain a financial or other benefit
⁵ Act of bad faith or deception
⁶ The act of giving a legal appearance to a sum of money of illicit origin