



The Genetix Code

'The Genetix code is not just a strapline. It's what binds us together. It sets out the minimum expectations we have for all of those that we work with. It represents and lays out our commitment to working at all times with integrity and when presented with tough choices, ensuring each of us just does the right thing. It forms the basis of how we work to 'simply make lives better.'

Neil Gammon

Integrity

6

We conduct our business with integrity

- We do not offer or accept bribes
- We exchange gifts and hospitality responsibly
- We disclose and resolve conflicts of interest
- We respect trade controls
- We compete fairly
- We require everyone we work with to operate responsibly

People

1

We value all people

- We embrace diversity
- We are inclusive
- We do not tolerate harassment & bullying

Assets, information & interests

2

We protect our assets, information and interests

- We protect and maintain our data, information and records accurately
- We use company property and assets correctly and responsibly
- We protect our intellectual property
- We act at all times to protect our systems
- We use social media responsibly



Safe & secure

5

We operate safely and securely

- We have a focus on health, safety and security
- We do not tolerate the misuse of drugs or alcohol at work

Customers

4

We treat our customers fairly

- We aim to deliver excellent customer service as an experience.
- We advertise, market and sell our products openly and fairly.
- We respect our customers privacy and choices

Communities & Governments

3

We work responsibly with communities and governments

- We engage positively in our communities
- We respect human rights
- We engage with governments & politicians responsibly
- We manage our impact on the environment we all share



Genetix is a better life business. Together we work to 'simply make life better.'

Our strategy is to develop and deliver effective business solutions that provide long term value to our employees and customers while lowering risks and improving people's lives.

We aspire to grow and inspire positive changes in the world around us.





The Genetix DNA



Respect

Respect is intrinsic in everything we do, everything we think and everything we say. Its non-negotiable. Without respect there is no trust and without trust we cannot be the business, or the people, we aspire to be.

We build trust through great everyday interactions with everyone around us. We're honest and open in everything we do.

We create inclusive working environments no matter where we are, in the real world or online.

We treat everyone the way we would like to be treated.





Creativity

Our customers are always moving. We need to be creative if we are to make sure they succeed.

We need to 'shoot for the moon', but make sure we pay attention to the small details.

We are free to explore, free to find better ways.

We think differently.

Focus

We are here for our customers. Our role is to use our talent, skills and expertise to help them achieve their goals.

We partner effectively from the very first time we meet and throughout our journey together.

We value and understand that when we work together, we all become better than we were before.

We are conscious that collaborating means we carry the responsibility of both our own, and our customers', brands with us in everything we say and do.





The Genetix Code

What is Our Code for? Our Code is more than just a set of rules. It sets out our minimum expectations for all those we work with. It is a guide to making good choices and represents our commitment to doing the right thing and acting with integrity.

Our Code forms the foundation of our Ethics & Compliance programme and represents a high-level summary of the key areas of Genetix Policies, Standards and ways of working including how we:

- Operate safely and securely
- Conduct business with integrity
- Value our people
- Treat our customers fairly
- Protect our assets, information and interests
- Work responsibly with communities and governments

Taken together, Our Code, Policies and Standards support our Values, demonstrate our commitment to being a responsible business and bind us together in the common pursuit of our purpose.

We should all live Our Code, not just the rules, but the values that underpin it.



Who does Our Code apply to?

Our Code applies to all of us, from our colleagues working on the frontline to members of the Board of Directors and to our affiliate companies. It also applies to all agency staff and consultants, whether working full-time, part-time, under a contract or on a temporary basis.

The actions of our business partners including joint venture partners and suppliers ('our third parties') can affect our reputation. We therefore want to work only with those third parties who share our commitment to doing the right thing, acting with integrity and who operate in a way that is consistent with Our Code.

Our Code and the law

We operate in many countries with different laws. Sometimes a law in one country may set a higher standard than Our Code. In those circumstances, we trust our colleagues to follow applicable laws and to do the right thing. If we do not obey these laws, Genetix and/or individuals could face fines, legal penalties or even imprisonment.

Breaches of Our Code can also damage our reputation and undermine the trust and confidence of our customers, our people and the communities in which we operate. So, as well as obeying the laws of the country we work in, we should always comply with Our Code and never knowingly allow or encourage anyone to do anything that violates it. If we suspect a violation, we will report it or seek guidance (see section 6 – Seeking further advice and raising a concern – Speak Up).





Our responsibilities under Our Code

Wherever Genetix operates, we all have a responsibility to understand, follow and apply Our Code to our work at all times. We also continue to represent Genetix outside of our contracted or normal hours of employment. In these instances, our behaviour can impact Genetix's reputation so we should ensure our actions are aligned with our Values and comply with Our Code. We will do this by:

- Reading and being familiar with the information in Our Code
- Acting and making decisions in keeping with the spirit of Our Code and complying with all applicable laws and regulations
- Annually confirming that we have acted and will continue to act in line with Our Code
- Completing required training on Our Code
- Raising questions or reporting concerns if we become aware of possible breaches of Our Code or any law
- Participating fully and honestly in any investigation into suspected breaches of Our Code
- Making sure everyone who works for us or with us understands Our Code and knows how to apply it
- Working with partners, third parties and customers who share our ethical standards.

If anyone fails to observe or uphold Our Code and associated Policies and Standards, they could face disciplinary action up to and including dismissal. If a business partner or third party fails to uphold Our Code, we may terminate the relationship.



Additional expectations of our managers and team leaders

As managers and team leaders we have extra responsibilities to:

- Be an example and role model for Our Code and our Values every day
- Work collaboratively and provide an environment where Our Code and our Values are promoted
- Take direct action when the expectations of Our Code are not being met
- Help others understand Our Code and encourage colleagues to seek help and advice through our confidential Speak Up service if they are unsure about what to do, or are concerned that Our Code is being violated
- Ensure our teams know they will be supported for doing the right thing, are listened to when concerns are raised and protected from retaliation if they report a violation or help with an investigation
- Act consistently and fairly and demonstrate courage when holding people to account or enforcing Our Code.



Doing the right thing is about making good decisions

Key to making good decisions is making sure we each fully understand each question as it arises. Sometimes this can take courage and sometimes it may make a task a little longer. Key to achieving our goals at Genetix is making sure we make the right decisions every time.

We've developed a simple approach to help you do the right thing.

1

Pause

Don't be impulsive
Think it through

2

Ask

Ask a manager
Or find a helpful contact to help you

3

Check

Does it comply with the law, regulations and our code?

Do you understand the risks?

Does it live our values?

4

Act

Act with the confidence that you're doing the right thing



The right thing

Further advice and raising a concern

If you, our partners or our customers see or experience something that isn't right, we need you to be able to tell us. Only by working openly with each other can we make sure Genetix is the best it can be.

- You can speak to your manager or supervisor
- If that is not possible you can raise the issue with any of the Directors
- Janice Bryson, Director of Investigations & Ethics is responsible to the board for ensuring matters raised are investigated and dealt with as quickly as possible.
- We will deal with any issue raised in the most confidential manner that we can. We will let the person who raised the issue know the outcome.

Zero tolerance on retaliation

Its important that we all feel able to raise concerns in good faith when we see something that isn't quite right. We recognise that this can be difficult to do. We will not tolerate any form of retaliation against anyone who has raised a concern.

We would investigate thoroughly any allegations of this type and if found to have occurred would consider that to be gross misconduct.

Genetix must be a safe place for everybody if we are to achieve our goals.





Genetix

Valuing our people

We value our people

Our people are fundamental to us achieving our goals. We think differently: we engage, collaborate and inspire a culture of mutual trust and respect.

We want people to feel motivated and able to develop their skills and experience so that they can positively impact the world around them by what they do.

We want to be an employer of choice, a trusted corporate citizen, a place where people know great ideas can be made a reality for the good of us all.

We believe that the health and wellbeing of our people is vital to the performance and successes of our business, while recognising the impact that work can have on their physical and mental health and wellbeing.

We are inclusive and embrace diversity

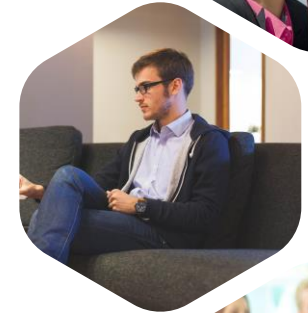
It's our differences that are our strength: we know that a team with a wide and diverse background will simply help us understand the world around us more easily and in actionable ways.

We know that talent wins. Our success depends upon us accessing and developing a diversity of talent. This can only happen in a place where every person knows they can be themselves and that their contribution is valued.

We make hiring decisions based upon making sure we select the right person for the job; on making sure our people have the right individual capabilities needed to ensure they can succeed in that role.

We will not tolerate any form of discrimination in either the real or virtual world. We expect our people to do the right thing at all times to ensure Genetix is a fair, just and enjoyable place for all of our people.

Who can I speak to?
The Director of Operations



We don't tolerate harassment or bullying

A great place to work has to be a safe place to work and that starts with Genetix being a place where everybody feels they are able to come and be their best self everyday.

We will work proactively to ensure conduct that may constitute harassment and bullying in any of its forms is understood by all of our people.

Harassment, bullying and victimisation can take many forms from threatening behaviour, applying unnecessary pressure or through unwanted physical contact.

All of us must understand how our behaviour can make others feel. We strive to ensure each of us works in ways that never makes anyone feel offended, intimidated or insulted.

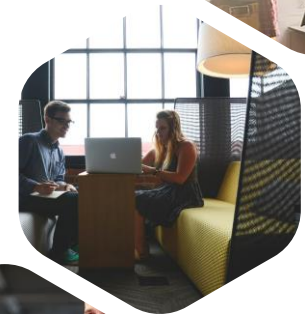
Who can I speak to?
Director of Investigations and Ethics

We offer fair reward and recognition

We operate fair and transparent reward and recognition schemes that are supportive of employment rights and people development.

We will pay at least a living wage and will comply with the laws on working hours in the countries in which we operate.

Who can I speak to?
The Director of Operations



A person's hand is shown holding a white card, likely an access card, near a blue door. The door has a black access control device mounted on it. The background is blurred, showing what appears to be a laboratory or office setting. On the left side of the image, there is a decorative graphic of overlapping hexagons in various colors including purple, yellow, orange, pink, red, and blue.

Genetix

Protecting our assets, information
and interests

We protect our assets, information and interests

We are committed to safeguarding our infrastructure, systems and equipment that hold records and data.

We protect and maintain our data, information and records accurately

Because of what we do we are entrusted with information that we need to ensure remains confidential. This can include information about our customers, our colleagues and our business partners. Confidential information includes any type of information which is commercially or market sensitive.

Examples of Confidential information are:

- Financial information
 - Marketing strategies
 - Business plans and processes
 - Customer and employee data
 - Merger and acquisition plans
 - Price or management changes
 - New product information
- We gather, handle, store and delete all personal data and information responsibly and legally. We ensure adequate controls are in place to protect data and information when they are transferred across borders and to third parties.

We do not disclose confidential information unless required to for the purposes of Genetix related work. We will have made sure we have the relevant confidentiality agreements in place with any third parties with whom we share information.

If we are unsure about the classification of data or how to handle and manage it we will escalate to our management team for guidance and advice.

All of our financial information is supported by appropriate processes and documents to ensure accurate and reliable records of transactions.

Who can I speak to?
The Director of Operations



We use and protect company property and assets responsibly.

We use company property and assets to perform our work in a responsible and careful manner.

We keep all of Genetix assets safe and secure, which include its facilities, property, computers, IS systems, information, corporate opportunities and funds.

We can, on a limited and occasional basis, make personal use of computers, phones, email and internet access so long as it does not interfere with work priorities, or present any risk or liability for the company.

In the absence of proper authorisation, other assets should not be used for personal activities.

Who can I speak to?
Director of Operations

We protect our intellectual property

Our intellectual property is one of our most valuable assets and we all have a duty to protect it.

We can do this by ensuring at each stage they are identified, understood and managed so as to ensure their security and unauthorised disclosure.

We will never knowingly infringe the IP of third parties.

During our work we will have, on occasion, access to Genetix IP and trade secrets. We do not use or disclose confidential information unless required to for the purposes of Genetix related work.

We must also closely guard our brand and its marks. These will only be used in ways that are authorised by the business.

Who can I speak to?
Director of Investigations and Ethics



We protect our systems

We use information systems correctly and within the guidelines provided. We understand that our data and our ability to operate effectively at all times is dependent upon our systems being available to us when we need them. We:

- Don't download and install unauthorised software and applications onto Genetix devices
- Never share login details and passwords
- Never leave devices unattended, insecure or unlocked
- Never access work related confidential information in a public place

We monitor the use of our information systems to ensure our operations remain secure. We may block access to certain internet locations, or prevent emails or documents being sent or received if they may jeopardise our business.

We may record telephone conversations for the purposes of training and quality management. If we do this those impacted will be made aware in advance.

- We do not access material that would be inappropriate, nor do we misuse the information systems made available for our use.

We use social media responsibly

There are occasions where Genetix will use social media as a method of interacting with our customers and communities. We have a process to do this with members of our team trained to make the most of these opportunities.

Unless authorised, we must ensure any other views expressed on social media are personal and cannot be misinterpreted as being the views of the company.

We are all aware that social media offers a global audience to our views and we ensure that at all times we remain respectful of others and we live our values online at all times.

Who can I speak to?

Director of Investigations and Ethics





Genetix

Working responsibly with
communities and governments

Our purpose is to 'simply make lives better'. A key part of this is ensuring we engage positively with the communities we operate within while managing our impact on the environment we all share.

We engage in our communities

Our business is bigger than us. We have an opportunity to positively impact those around us if we understand how our business impacts the communities we operate within.

We create positive and lasting relationships within the communities we work with to ensure the issues that matter most are recognised and positively addressed in what we all do.

Who can I speak to?
Director of Operations

We respect human rights

We respect the human rights of all of those that work with us, for us or whose communities we work within or alongside.

We never knowingly cause or contribute to any activity or relationship that violates human rights in any way, either directly or indirectly.

If we see or experience any violations of those human rights we will speak up and act, we will not be complicit by our silence.

We will not work with or allow our services to support in any way anyone that uses any form of forced, compulsory, illegal or child labour or who has involvement in any form of human trafficking.

To ensure we do not support such activity we ensure relevant due diligence within our sphere of operations including our supply chain.

If we discover any elements of breaches of this policy we will take action to resolve the matter as rapidly as possible including, if required, severing that relationship.

Who can I speak to?
Director for Investigations and Ethics



We engage with governments and politicians responsibly

We are politically neutral but may on occasion engage with political stakeholders as a part of our work.

These engagements are at all times undertaken professionally and in a manner that is consistently neutral to any political group.

To ensure this remains the case only those authorised by the company to engage in these relationships may do so.

We do not make contributions to any political party, individual politicians or government employees and any contributions made, for example to charities or good causes, must be assessed to ensure that there is no political allegiance to that group which may breach this policy.

Being involved in lawful political activity outside of work is allowed but care should be taken to ensure that any involvement is not misconstrued as the views of Genetix.

Who can I speak to?
Director of Investigations and Ethics

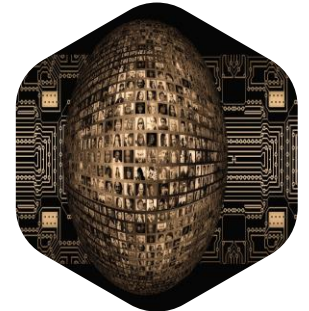
We engage with the media responsibly

We understand that the media is a wide term and can be used to describe mass communication channels of various types across a variety of mediums. Our social media policy is described in 'Protecting our assets, information and interests'(2). This section deals with what we term the mainstream media and includes television, radio channels and newspapers including any online publications.

We do not talk to the media about any matters that are connected to our work with Genetix or our colleagues or customers.

If we are approached by the media in any way, we will make no comment but will refer them directly to the Director for Investigations and Ethics.

Who can I speak to?
Director for Investigations and Ethics



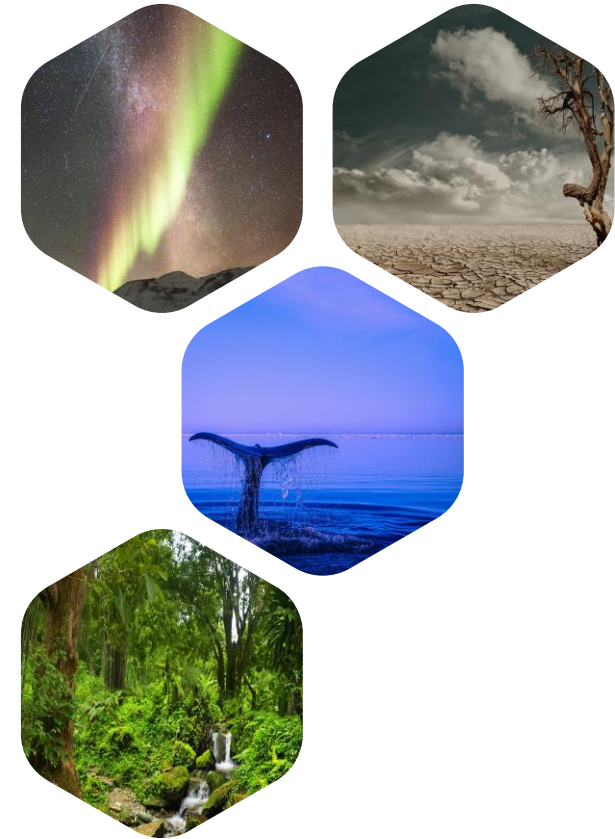
We manage our impact on the environment

We care about the environment and we know that by using innovation and inspiring change in those we work with, we can play a role in making our environment safe for the generations to come.

We recognise that it's not just the big things that we do as a company but the small things we can do as individuals that can really make a difference.

We will continue to adopt good practice and understand how we can evolve to better fit our business and operating model. We will track and demonstrate this ensuring we continue to evolve towards our targets.

**Who can I speak to?
Director of Operations**





Genetix

Treating customers fairly

We treat our customers fairly

We know our customers have a choice. We aim to provide not only great value but a great experience when customers choose us to work with them.

We must work hard to understand what our customers need today and what they will need tomorrow. We provide innovation based upon making sure our customer succeeds.

We aim to deliver the best customer experience

We operate in a competitive market place and believe we hold a unique perspective on how we can make life better for our customers.

To do this we will work hard to always:

- Innovate and deliver effective and competitive customer solutions
- Meet the differing and constantly evolving needs of our customers
- Deliver simple, personalised experiences across everything that we do
- Ensure we are clear, accurate and transparent in all of our customer interactions
- Resolve customer issues quickly and in ways that are mutually beneficial
- Seek to engage with customers to understand their future needs

Who can I speak to?
The Director of Operations





We advertise, sell and promote our products openly and fairly

We demonstrate fairness, understanding and integrity in all of our sales, promotional and marketing activities in order to enhance and protect our reputation, as well as to increase trust in our sector.

Our advertising, sales and promotional activities will at all times comply with local laws and regulations and will be truthful and honest.

We respect and value customer privacy

We are committed to protecting the data, information and privacy of our customers and each other.

To do this we will ensure adequate controls are in place to guide and secure the way we:

- Gather
- Handle
- Use
- Store
- Transfer
- Manage and delete

all data that we work with.

**Who can I speak to?
The Director of Operations**





Genetix

Operating Safely and securely



Keeping our people, our partners and our customers safe has to be a top priority for all of us. We believe no one should suffer as a result of the work that they do.

We focus on health, wellbeing, safety and security

We remain committed to ensuring people stay safe while at work. We all have a vital role to play in this. To ensure we achieve this goal there are a number of things we can all do:

- Be aware of current health, safety and security policies and ways of working. These are written to ensure we remain operating safely and within the law.
- Participate in relevant training.
- If we see something that's not right we intervene. We will not become complicit by our inaction.
- Report issues and concerns to your local management as soon as you can.

Who can I speak to?
The Director of Operations

We do not tolerate the misuse of drugs or alcohol at work

Illegal drugs and alcohol in the workplace cannot be tolerated. Their use impacts the performance of people and their judgement, making errors and accidents more likely. This puts us all at risk.

We prohibit the use or possession of illegal drugs and alcohol while at work with the exception of over the counter medication or those which are prescribed by your Doctor.

We all have a responsibility to come to work able to do our best work and free from the influence of drugs or alcohol.

If you're taking prescribed medication which may impact your ability to do the job, let us know so we can make adjustments to ensure our workplace remains safe.

Who can I speak to?
The Director of Operations





Genetix

Conducting business with integrity

We conduct our business with integrity

We are committed to working with integrity, within the laws and regulations of all the countries we operate and in accordance with recognised international standards.

We exchange gifts and hospitality responsibly

We recognise that the exchange of appropriate gifts and hospitality can be part of building business relationships. However, we do not accept or offer gifts or hospitality that could appear to create an improper advantage for Genetix or influence us or any third parties improperly.

The practice of offering gifts and hospitality can vary in different geographical locations, often depending on local laws and customs.

Regardless of where in the world we are operating, gifts and hospitality received from, or offered to, a business partner, supplier or customer must be in line with the Genetix Group Gifts & Hospitality Standard, which is available online.



We do not offer, nor accept bribes

It is both illegal and unethical to accept or offer bribes or other improper payments or incentives in order to gain or retain business.

We will take care when accepting or offering gifts or hospitality and be certain the grounds cannot be misinterpreted.

Giving or accepting such a payment or incentive could result in substantial fines to the company, damage to our reputation and penalties to individuals including both fines and in some cases, imprisonment.

The only exception to this rule is where there maybe an assessed risk of personal harm. If this is the case the Director of Investigations and Ethics should be involved.

We will work with our partners and third parties to ensure they both understand and share this commitment.

Any gift or hospitality offered or received, whether accepted or declined, that exceeds set limits must be entered on the Gifts & Hospitality Register and have line management or relevant functional approval before any offer is made or accepted.

**Who can I speak to?
Ethics & Compliance**

Any gift or hospitality offered to or received from a public or government official, including government employees, representatives of a government or government-owned entity, or any of their family members, of any value, whether accepted or declined, must have pre-approval from Ethics & Compliance, and be entered on the Gifts & Hospitality Register.

Any offer of a gift or hospitality that could influence our judgement improperly in favour of a third party should be politely rejected and recorded in the Gifts & Hospitality Register. There may be further restrictions for employees authorised to transact on respective financial markets and the Genetix Group Gifts & Hospitality Standard should be consulted.

**Who can I speak to?
The Director of Investigations and Ethics**

We disclose and resolve conflicts of interest

Conflicts of interest can arise when personal interests compete with Genetix's interests and impact our ability to make objective decisions. Therefore, we will never use our position, influence or company information, assets or resources in any way that improperly benefits ourselves or others. Conflicts of interest can arise in many different situations, often occurring naturally as a consequence of a system or process and at any time, place or level within the business. The existence of a conflict of interest does not necessarily mean that something is wrong; it is important that we identify and declare actual, potential and suspected conflicts of interest to line management so that appropriate mitigating and management action can be taken. A failure to recognise or take appropriate steps in relation to actual, potential or suspected conflicts of interest could, on occasion, result in criminal action, pose a major risk to the business, significantly affect reputation and/or undermine stakeholder confidence.

**Who can I speak to?
The Director of Investigations and Ethics**



We respect trade controls

We respect and observe the trade controls of all the countries we operate in including economic sanctions and import and export laws. This helps ensure that we do not do business with any country, person or business that has trade sanctions or controls imposed against them. We should always know who we are doing business with by following relevant due diligence procedures and ensuring that business partners, customers, merger / acquisition partners and other third parties are screened in accordance with existing due diligence procedures for concerns, such as global sanctions, restricted jurisdictions and trade control lists.

Who can I speak to?
The Director of Investigations and Ethics

We do not participate in money laundering

We protect Genetix's products and services from being used for the purposes of money laundering and terrorist financing. Criminals could use companies like Genetix to launder the financial proceeds of criminal activity. In doing so, they may try to hide their identity, or the identities of third parties, as well as disguise the origin of the funds or assets that they are seeking to launder. We should always evaluate businesses we want to work with by following relevant due diligence procedures and ensuring that business partners, customers, merger / acquisition partners and other third parties are screened against global restricted parties' lists.

Who can I speak to?
The Director of Investigations and Ethics



We do not tolerate fraud

We are committed to the prevention, detection and investigation of fraud and do not tolerate it in our business.

All forms of fraudulent conduct or dishonest behaviour are therefore prohibited at Genetix and we will report any serious matters to the relevant authorities.

Where we are made aware of or suspect a fraud, we will speak to our line manager, Ethics & Compliance or raise our concerns via Speak Up.

We do not use or pass on insider information

Where we have access to unpublished, price-sensitive information about Genetix and our business partners we do not use it for our own or another's benefit.

We do not share any confidential information with our friends, family and/or acquaintances.

There are large fines and potential imprisonment associated with insider dealing or trading both for Genetix and any individual involved.

Who can I speak to?

The Director of Investigations and Ethics



We compete fairly

We compete robustly and effectively but deal with our customers, competitors and business partners in a fair and ethical way and do not engage in any activity which is anti-competitive.

We want the markets we operate in to be fair and competitive and therefore we will be objective and independent when we decide the markets we operate in, how we operate and the prices we charge.

Agreements or communications with competitors which lead to sharing markets, fixing prices, limiting production or collusive tendering are prohibited by law and we do not engage in these activities.

Certain organisations, businesses and projects within Genetix operate in a manner that requires commercially sensitive information and customer data to be maintained separately from the rest of Genetix Group.

Who can I speak to?

The Director of Investigations and Ethics

We require everyone we work with to operate responsibly

We want to extend positive social and environmental impacts beyond our immediate operations, which is why we require our business partners and third parties to embed responsible business practices and to act consistently with Our Code.

We proactively engage our supply chain in line with our Values and Our Code to ensure standards are upheld and take action if we find our business partners and third parties failing to meet expectations.

Who can I speak to?

The Director of Operations





For further information visit: www.genetixrm.com

Person responsible for this policy: Michael Hodges (Director of Operations)

michael.hodges@genetixrm.com