

RULES OF CONDUCT

SEPTEMBER 2023



FOREWORD

As a key player in the protection of patients' health, it is essential to conduct our business in an exemplary manner and to place ethics and integrity at the highest level of importance among our corporate values.

I am counting on each and every one of you to contribute and ensure that our business is conducted with the strictest respect for the ethics and humanitarian values that drive Transgene and the companies in the Institut Mérieux group.

This Code is a guide designed to help each of us act in accordance with these values. It is a practical reference tool to ensure that we comply with the law and make ethical decisions.

It is important for each employee to take the time to read this Code very carefully, in order to analyze and understand what Transgene and the Mérieux group expect of us in terms of behavior to adopt and respect, in order to maintain and promote high standards of integrity, fairness and respect in our daily work.

It is important for each employee to take the time to read this Code very carefully, in order to analyze and understand what Transgene and the Mérieux group expect of us in terms of behavior to adopt and respect, in order to maintain and promote high standards of integrity, fairness and respect in our daily work.

However, this document undoubtedly does not answer all the questions that everyone may have and does not exempt everyone from exercising their own judgment and using common sense. If you have any questions about what you should do, the Group has set up a training and assistance system and an internal alert system detailed in this document.

Alessandro Riva
Chairman and CEO

USEFUL CONTACTS

In case of doubt or concern about a question of ethics, good conduct and/or whistleblowing, any Transgene employee may ask his or her direct or indirect line manager or refer to the General Counsel/Corporate Secretary (the Ethics & Compliance Officer), the Human Resources Director or the Chief Financial Officer.

Alternatively, for any questions relating to Ethics and Compliance you may contact Transgene's Ethics & Compliance team at codeconduite@transgene.fr.

If you cannot or do not wish, for legitimate reasons, to address these contacts in person, you may use Transgene's online reporting portal: <https://transgene.alertcenter-ikarian.eu>

For more information on Transgene's whistleblowing system, please refer to page 9 of this Code.

September 2023

RULES OF CONDUCT

TABLE OF CONTENTS

RULES OF CONDUCT.....	5
THE VALUES OF INSTITUT MÉRIEUX AND OF TRANSGENE	6
RULES OF CONDUCT WITHIN THE INSTITUT MÉRIEUX.....	7
TRANSGENE AND THE INSTITUT MÉRIEUX GROUP SHARED PRIORITIES	10
LEXICON	18

RULES OF CONDUCT



TRANSGENE, MEMBER OF THE INSTITUT MÉRIEUX GROUP

Transgene is part of Institut Mérieux, and in keeping with the principles of Institut Mérieux, undertakes to act throughout the world in accordance with the Group's public health mission and in compliance with the laws governing each of its activities. This is why Transgene has established these Rules of Conduct.

In this undertaking, Transgene also relies on multidisciplinary initiatives developed by Institut Mérieux for all of its companies participating in different domains of activity, so as to guarantee adherence to a shared vision of ethics and compliance.

Hence, the Rules established by Transgene consistent with those of Institut Mérieux embody the foundational principles that each of its employees must follow.



RESPECT FOR MÉRIEUX GROUP VALUES WORLDWIDE

Transgene bases its actions on the respect of Institut Mérieux's long-standing ethical values, which are translated into specific behaviors. Transgene intends for its employees to enduringly adhere to the values of Institut Mérieux particularly through this charter, the "Rules of Conduct".

THE VALUES OF INSTITUT MÉRIEUX AND OF TRANSGENE



DEMAND THE BEST

- Act with ever-renewed ambition, with a sense of humility,
- Be open to different cultures and new ideas,
- Target excellence,
- Explore new territories (geographical, technological, scientific, etc.),
- Demonstrate courage and daring, know how to be resilient and adapt.



CREATE VALUE

- Take risks and assume responsibility for one's actions,
- Innovate in all domains,
- Advance scientific and technological frontiers: privilege multidisciplinary approaches and partnerships,
- Give priority to the long-term vision.



SUCCEED TOGETHER

- Be a team player both in failure and success,
- Commit to activities responsibly to advance science and research,
- Train co-workers and coach them in their career path, transmit knowledge and methods,
- Create an enduring heritage based on everlasting values: continuity, loyalty, respect for others

RULES OF CONDUCT WITHIN THE INSTITUT MÉRIEUX



ABOUT INSTITUT MÉRIEUX

Institut Mérieux has a long history built on strong values transmitted from generation to generation. This heritage allows Institut Mérieux to maintain a long-term vision and to remain faithful to its values.



ABOUT TRANSGENE

Transgene embodies the Institut Mérieux spirit and protects its reputation by conducting its commercial activities consistent with its public health mission and applicable regulations.

Transgene's Rules of Conduct provide the framework and guidelines as to how to implement this responsibility.

Transgene respects Institut Mérieux's heritage and implements Ethics and Compliance programs in order to ensure that policies and practices, whether internal or external, are consistent with the Group's culture of ethics and integrity.

This is why Transgene has established these Rules of Conduct, making them available to its employees and business partners, so as to allow them to make good choices when they encounter ambiguous situations and take good decisions in an extremely diversified and complex professional environment.

THESE RULES OF CONDUCT APPLY TO ALL TRANSGENE EMPLOYEES

These Rules of Conduct apply to all employees and partners, all directors and administrators of Transgene. Transgene, just like Institut Mérieux, also seeks to extend the established Rules to the suppliers, clients, and distributors of each Group company.

Each employee has an obligation to comply with Transgene's Rules of Conduct. Each Group company is responsible for ensuring that the internal Rules of Conduct are distributed to all of its employees.

Transgene, with its registered office in France, directly and indirectly has a worldwide presence and must respect the national laws and regulations of every country in which it acts. Given the great diversity of cultural and political systems, a single global standard is not necessarily appropriate to respond to the regulatory requirements of a given domain. The higher standard, between local legislation and Transgene's Rules of Conduct, will then apply.

COMPLIANCE IS EVERYONE'S BUSINESS

All Group employees are responsible for complying with the Rules of Conduct. Every day, Transgene's actions impact the image of the Group and also the reputation of its various entities. Behavior by a single employee that is contrary to ethics or morals may suffice to cause significant damage to Transgene and to the entire Institut Mérieux.

More than anyone else, managers must embody the values of the Group and the Rules of Conduct, by demonstrating ethical behavior and irreproachable management. Transgene encourages its managers to promote the importance of compliance by integrating it as a key element into their decision-making.

Should there be a serious concern about a behavior that might infringe on the Rules of Conduct or other elements of the Rules of Conduct, managers must send the dossier to their supervisor or to the persons named under the heading "USEFUL CONTACTS" at the page 3 of this document.

Managers must ensure that key compliance messages are communicated, respected, and followed in their departments, even if this duty of information in no way releases employees from their own individual responsibility.

Institut Mérieux is fully aware that its expertise in the field of infectious disease and food safety as well as its international presence oblige it to act as a socially responsible group. It must serve public interest and the communities in which it is present. Transgene adheres to this vision of Institut Mérieux.

ETHICS AND COMPLIANCE

To support its Values, Transgene has implemented clearly identified and empowered compliance managers and departments. When required by a given question of compliance (e.g.: quality, HR, finance, etc.), several compliance referees may be named. These compliance referees will administer the Rules of Conduct in collaboration with the General Counsel/Corporate Secretary, the Compliance officer.

Training and audit programs

Transgene uses the Group's Internal Audit team and Mérieux University for these programs:

- Group Internal Audit: The Internal Audit Department contributes to the evaluation, continuous improvement, and integrity of operational processes, as well as the continued operations of the various Institute companies, including Transgene.

The Internal Audit Department relies on the Internal Audit Charter which defines its function, mission, the extent of its field of expertise, and the methodology used (in accordance with the standards of the profession).

- Mérieux University: Mérieux University plays a key role in transmitting the internal culture of Institut Mérieux and compliance with its values. It also disseminates best practices as part of training programs directed to all employees of the various companies.

Whistleblowing System

When you observe a behavior that you believe violates our Code, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of your management team, who will escalate the concerns through the proper channels. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner, in that case, you can report your concerns through our online portal.

The online alert platform, secure and accessible from any Internet browser, is available continuously (24 hours a day, 7 days a week) at the following address:

<https://transgene.alertcenter-ikarian.eu>

Employees who express a genuine concern will not be subjected to retaliation, retribution, or any form of harassment. No employee at any level is permitted to engage in such retaliation, retribution, or harassment against any other employee for expressing a concern in good faith. Managers may not in any way discourage employees from taking concerns or complaints to the proper channels, including Ethics & Compliance, Human Resources and Legal.

To find out more about how the whistleblowing system works, please consult Transgene's whistleblowing procedure on Transgene's website under "Ethics and Compliance".

Questions regarding Ethics & Compliance

For any questions regarding ethics and compliance that do not fall strictly within the scope of the whistleblowing procedure, you can also contact the Ethics & Compliance team in charge of compliance issues at Transgene by e-mail at:

codeconduite@transgene.fr

TRANSGENE AND THE INSTITUT MÉRIEUX GROUP SHARED PRIORITIES

1. DEVELOP, PRODUCE, AND SELL HIGH QUALITY AND SAFE PRODUCTS AND SERVICES

2. ACT CONSISTENT WITH THE COMMERCIAL REGULATIONS GOVERNING INTERNATIONAL COMMERCE

3. BE ENGAGED FOR TRANSGENE TEAMS POSITIVELY

4. INTERACT WITH THE VARIOUS ENVIRONMENTAL PROTECTION COMMUNITIES

5. SECURE INFORMATION SYSTEMS AND ETHICALLY COMMUNICATE IN WRITING

1. DEVELOP, PRODUCE, AND SELL HIGH QUALITY AND SAFE PRODUCTS AND SERVICES

In the health sector, ensuring the quality of products and services is essential to guarantee patient and consumer safety. Companies of the Institut Mérielux group have developed quality management systems and procedures in order to guarantee the reliability and quality of their products and services all while maintaining optimal performance and complying with the strictest international regulations. Because it provides high quality products, information, and services that are essential to the health of those persons whose lives may depend on them, Transgene is responsible for ensuring that quality and safety are recognized priorities.

COMPLIANCE AS RELATES TO RESEARCH AND BIOETHICS RESEARCH

Transgene strives to protect the health of everyone while accounting, from the start, for the bioethical implications of its biomedical research activities.

PROMOTION AND MARKETING

Transgene products and services are intended to offer significant benefits to its clients and patients. It is thus essential to provide them with accurate, transparent, and objective information about these products and services. This information must be shared in accordance with the laws, regulations, and industrial codes in force.

2. ACT IN COMPLIANCE WITH THE COMMERCIAL REGULATIONS GOVERNING INTERNATIONAL COMMERCE

Transgene has clients, suppliers, and partners throughout the world. In terms of international business, one country's legislation may apply to transactions taking place in another country. Employees involved in international exchanges must know and comply with the laws, regulations, and restrictions applicable to matters of import, export, international tax rules, boycotts, customs duties, and embargoes.

Non-compliance with these restrictions may result in civil and criminal sanction, as well as in the loss of rights for importing or exporting.

Transgene asks that its employees and business partners pay special attention to the regulations as concerns:

EXPORT CONTROLS

Most countries have laws and regulations which limit or prohibit export to certain countries or individuals, or towards certain organizations. These restrictions are intended to prevent such parties from obtaining knowledge, products, or technologies that are potentially harmful to people or the environment. Many countries publish blacklists on which are found, namely, identified terrorists or drug-trafficking organizations.

LEGISLATION CONCERNING IMPORTS AND CUSTOMS

Any tangible or intangible element brought into a country from another country constitutes an import subject to legislation governing imports and customs duties. As an importer, an entity must diligently determine the classification, value, and country of origin for all imports.

INTEGRITY OF INTERACTION WITH PARTNERS

The Institut Mérieux group's global network of suppliers and other business partners is a major advantage for Transgene and the Group. To best serve clients of the Institut Mérieux group throughout the world, it is important for Transgene to develop strong and mutually beneficial relationships with responsible suppliers and partners.

ETHICAL OBLIGATIONS ON THE PART OF SUPPLIERS AND PARTNERS

Transgene strives to deal with suppliers and other business partners who share the same ethical and balanced commercial practices. Transgene adheres to the Group's principles for responsible purchasing that apply to all third parties with whom it deals. According to these principles, suppliers and partners must, among other things:

- Comply with all laws and regulations of the countries in which they are active;
- Refuse to participate in any corrupt act;
- Avoid and eliminate anticompetitive practices;
- Follow the applicable legislation in terms of international business;
- Assume responsibility for the health and safety of their employees;
- Respect fundamental human rights, including the prohibition against child labor;
- Human trafficking and any other cruel, inhuman, or degrading practice;
- Comply with labor laws;
- Authorize the free association of employees;
- Act in accordance with international laws and standards governing environment protection.

SELECTION OF SUPPLIERS AND EQUITABLE TREATMENT OF PARTNERS

Transgene seeks to enable and encourage diversified structures to present their products, services, and expertise to Transgene and to the Group. This may involve small-scale structures, run namely by women, minorities, veterans, or handicapped persons.

The selection of suppliers must be based on price, quality, delivery conditions, diversity criteria, and reputation. It must also take account of their respect for responsible business practices in terms of ethics and the environment.

Transgene participates in the initiative launched by Institut Mérieux that encourages all procurement departments of the Group companies to share their best practices and to establish lasting relationships with suppliers based on a responsible approach in terms of procurement.

ANTI-CORRUPTION CAMPAIGN

Companies have a major role to play in the global effort to fight corruption.

Corruption increases business costs, creates unfair competition, harms innovation, and weakens social structures. It delays, distorts, and misappropriates economic growth, increasing poverty.

Transgene, like the larger Institut Mérieux Group, undertakes to conduct its activities without any unfair influence from bribes and corruption. There must be nothing given under-the-table nor any inappropriate advantage, whether directly or indirectly. Moreover, Transgene's partners (suppliers, distributors, subcontractors, or agents) must never act illegally or contrary to the ethics for employees of the Group companies. An unfair advantage may be any item of value, including an illegal commission or payment, an illegal rebate, an under-the-table payment, a gift, a reception, or a trip. For these reasons, Transgene has adopted a specific Anti-Corruption Code.

COMPLIANCE WITH FAIR COMPETITION

Transgene and Institut Mérieux have every interest in promoting a business sector with trustworthy practices. Most national and regional economic systems identify free competition as being the most beneficial avenue for consumers. The equitable relationships of Transgene and the Institut Mérieux group with their competitors promotes confidence in their customers and facilitates their work.

FINANCIAL INTEGRITY AND ANTI-MONEY LAUNDERING MEASURES

Many people, including our employees and shareholders, tax and governmental authorities and the public, trust that the Group entities maintain accurate and honest books. The operations of Group entities must be recorded as required in accordance with international accounting standards and other standards in force locally, and, as applicable, within Institut Mérieux and Transgene. Transgene develops financial procedures and policies consistent with the standards and ensures that each of its entities comply with these rules. Any participation in money-laundering operations is formally prohibited. The detection of any irregularity as to the country of origin or financial institutions involved in a transaction must be investigated and must be reported internally through the alert channels mentioned on pages 3 and 9.

AVOIDANCE OF CONFLICTS OF INTEREST

Any commercial decision must be based on merit and not on personal interest.

Any relationship or any personal interest that may hinder an employee from taking a fair and impartial decision constitutes a conflict of interest and must be avoided. Any potential conflict of interest must be reported immediately.

Acceptance of gifts, incentives, commissions, remuneration, or honoraria above a nominal value constitutes a conflict of interest for employees of the Group and of Transgene. Such things must be refused or abstracted from any situation in which an amicable or familial relationship may alter objectivity in their judgment.

Use of the Group's goods and services is authorized only for legitimate commercial purposes and not for an employee's personal benefit and never for illegal or unethical purposes. The personal use of the company's information technology resources (Internet, telephone, etc.) must never interfere with productivity at work and must not exceed a nominal cost for the Group; the company's e-mail is reserved for strictly professional use.

Employees must avoid engaging in outside employment that could have a deleterious impact on their performance within the Group.

INTERACTION WITH HEALTH PROFESSIONALS

Essential to the success of Transgene, health professionals greatly assist in the development of products and services, the conduct of clinical trials, and are of precious assistance to patients in the use of their solutions.

Transgene and its employees and representatives must never offer or provide anything whatsoever to a health professional in order to unduly influence that person's prescriptions, recommendations, purchasing, or procurement of products or services from the Group entities. All interactions of Group entities with health professionals must be based on legitimate professional reasons. What may be allowed as a business practice or courtesy in other domains may be inappropriate regarding a health professional. When the law so requires, any transfer of a thing of value from Transgene to a health professional must be recorded and reported to the government.

3. BE ENGAGED FOR TRANSGENE TEAMS

Faithful to the Group's visionary and humanist heritage, Transgene wishes to attract and develop innovative talents, rich in professional and cultural diversity. The Group is intent on promoting a safe work environment that promotes the integration of everyone, at Transgene and among the other Entities, within which employees can fully realize themselves.

In this spirit, Transgene respects the fundamental conventions of the International Labour Organization (prohibition of child labor and forced labor, respect for the freedom of association), the promotion of diversity, women's rights, the right of people to freely dispose of their natural resources, and the right to health.

ENSURE A HEALTHY AND SAFE WORK ENVIRONMENT

Transgene must take reasonable precautions to prevent the occurrence of bodily accidents. To do this, it must maintain a safe workplace and comply with requirements related to health, safety, and the environment.

Employee safety is a priority. Any act or any threat of violence in the workplace, by or against an employee, is prohibited. Under no circumstances may employees bring weapons or any other potentially dangerous product or object to their workplace or to the offices.

PROMOTE AN OPEN WORK ENVIRONMENT THAT PROMOTES INTEGRATION, DIVERSITY AND NON-DISCRIMINATION

Diversity of Transgene employees is a strength and must be encouraged.

Respect for this diversity particularly involves reasonable accommodations in order to assist employees who have disabilities and specific social needs.

Any negative discrimination against an employee or a group of employees due to their sex, age, race, ethnic group, nationality, religion, marital status, sexual orientation or identification, handicap, state of health, genetic information, or any other characteristic protected by applicable law, is prohibited. All aspects of a work relationship, such as recruitment, powers, promotions, compensation, discipline and dismissal, must be realized without consideration of these characteristics.

Transgene undertakes to provide a work environment that is respectful of everyone and does not tolerate harassment of an individual for any reason whatsoever.

RESPECT FOR HUMAN RIGHTS

Transgene promotes the respect for the international framework of human rights and opposes forced labor and the exploitation of child labor. Transgene's operations strictly adhere to laws against human trafficking and slavery.

4. POSITIVELY INTERACT WITH THE VARIOUS ENVIRONMENTAL PROTECTION COMMUNITIES

Transgene and the Group's mobilization in favor of sustainable development reinforces our social commitment. Beyond following environmental laws and regulations, Transgene seeks to minimize its environmental impact.

PROMOTE CORPORATE SOCIAL RESPONSIBILITY AND PHILANTHROPY

The Group is committed to serving public health. It devotes the largest part of its financial giving to support actions by the Mérieux Foundation and the Christophe et Rodolphe Mérieux Foundation.

Other initiatives are conducted in those countries where the Group companies' sites and subsidiaries are located.

Selected projects are primarily associated with:

- Engagement for Human Resources, especially related to health and integration in the workplace.
- Projects which allow the entity to act as a citizen throughout all of the sites where it is located and to respond to requests from organizations recognized as being in the public interest.
- These voluntary contributions echo the Group's public health values and are not motivated by any expectation of favor or commercial benefit in return.

Hence, Transgene is engaged in various subject areas:

- With respect to handicap issues: Transgene conducts a policy to fight handicap-related stereotypes. This policy is reflected by consultations open to all employees about health issues, consideration of illness and handicaps in the company, for oneself or one's family members and assistance in steps to gain recognition of handicaps. Each year, the company also organizes a handicap day in the company. This is a day of outreach intended to grow mindsets and break prejudices. Transgene respects the obligation to employ 6% Handicapped workers. Internal sensitization programs directed to all employees have thus borne fruit and changed the way handicapped persons are considered.
- With respect to parenthood: Since its creation, the Company has sought to implement many measures to facilitate the work/life balance of its employees: part-time work chosen, maintenance of salary at 100% for maternity and paternity leave; financing of spots at the inter-company day-care center at the Innovation Park.
- With respect to the transmission of knowledge: As part of the policy on bringing young people into the company, transmitting knowledge and skills, and coaching departing pensioners, Transgene has committed to inserting young people into the workplace. Commitment No. 4 of this policy concerns the promotion of diversity. This is the context in which Transgene entered into a partnership agreement with the association: "Nos Quartiers ont du Talent" (Our Neighborhoods Have Talent). The association conducts operations intended to promote the professional insertion of young people with diplomas (Bac+3 and higher, less than 30 years of age, coming from poor families, and some of whom live in underprivileged neighborhoods), in the form of a system of sponsorship by employees experienced in business. Sponsoring is an approach based on good citizenship and volunteering, open to all employees who so desire, at the heart of SRE values and the Transgene spirit.

5. SECURE INFORMATION SYSTEMS AND ETHICALLY COMMUNICATE IN WRITING

Transgene's commitment related to integrity relies on the creation, administration, and destruction, as provided by standards, of precisely maintained commercial documents. These documents are extremely precious. Consequently, their administration and their protection must be meticulous. The correct retention of data is an important point in the compliance policy.

DOCUMENT RETENTION AND DESTRUCTION

Some national legislation and audit standards oblige Transgene to retain documents for a given period. A breach of these international and local rules may trigger financial penalties or constitute a significant disadvantage on the occasion of any legal actions.

CONTRACTS AND OTHER LEGAL AGREEMENTS

Possessing valid and enforceable legal documentation is essential to the Group entities in order to reach their professional objectives and to eliminate all commercial, legal, and ethical risks. The absence of a legal foundation may compromise the application of a commercial arrangement in case of conflict or litigation. It may also be difficult, or even impossible, to recognize revenues according to accounting rules or to require a party to demonstrate compliance with the standards of Transgene or of Institut Mérieux Group.

Rigorous documentation of services provided to Transgene by intermediaries such as consultants, advisers, agents, specialists, or distributors is thus essential. Compensation of these third parties must be clearly defined to perfectly correspond to the services delivered and must be correctly booked in due form in Transgene's books. Compliance and ethics obligations must be documented to guarantee intermediaries commitments with respect to the Rules of Conduct.

APPROPRIATE USE OF THE INFORMATION TECHNOLOGY SYSTEM

The information technology (I.T.) system is undeniably a part of Transgene's principal assets. As it becomes ever more advanced and indispensable to daily activities, its protection is of primordial importance for everyone. Each user of the I.T. system must know the best practices, most of which involve good sense, so as to actively assist in its security.

RESPECT FOR INTELLECTUAL PROPERTY RIGHTS

Transgene dedicates a substantial portion of its human and financial investments to the development of ideas, products, and innovative processes in technical, scientific, financial, or commercial domains. All of this information represents an asset of great value, and it must be protected with the greatest care, physically and legally.

Employees must preserve the confidentiality of the Group's industrial and commercial secrets, and information that must not be disclosed. These secrets may include information about the development of systems, processes, products, know-how, and technologies.

All Group employees are formally prohibited from appropriating information learned from a third party in a professional setting when it is reasonable to believe that this information is confidential or constitutes a violation or infringement of intellectual property rights (including patents, copyright, trademarks, or industrial or commercial secrets) of a third party.

RESPECT FOR CONFIDENTIALITY AND PROTECTION OF PERSONAL DATA

Confidentiality is a fundamental right under article 12 of the 1948 Universal Declaration of Human Rights, and Transgene commits to preserve the confidentiality of personal information. Many countries, including France, have strict laws about the use of personal data. These laws require companies to take adequate measures to preserve confidentiality, the integrity, and availability of personal information.

Any employee authorized to access such information must adhere to the rules for the protection of personal data and must collect, use, and disclose these data only in a way that complies with local regulations and legislation.

PROTECTION OF PATIENT DATA

In each of its activities in the health sector, Transgene handles very sensitive personal information: patient data. The Group undertakes to protect the health information of patients and to apply current regulations to the conditions for the use and disclosure thereof.

Processing of this data is prohibited for purposes other than the treatment of patients or research with their consent. The disclosure of this information must be limited to the minimum that is strictly necessary to reach the authorized objective. Employees who have access to patient data and to protected health information must commit to preserve their confidentiality.

MANAGEMENT OF CONFIDENTIAL INFORMATION

Transgene employees must strive in every situation to protect the company's assets and to preserve them against any theft, waste, damage, and any loss, negligence, or misuse. These assets include Transgene's confidential information, whether oral, written, or in electronic format. This is a non-exclusive list of the company's confidential information:

- all information related to innovation and manufacturing data and processes (designs, performance statistics, test data or specifications, etc.). All information about employees.
- The internal policies, procedures, standards, and work instructions.
- Information associated with the market for Transgene products and services (clientele, patients, price, contract terms and conditions, and partnership strategies and tactics, as well as information about suppliers, etc.);

- Financial information not published by Transgene or information about its transactions, including transactions concluded with clients, financial agents, and suppliers, mergers and acquisitions, and asset disposals.

If confidential information must be communicated to outside parties, they must first sign a confidentiality and non-disclosure agreement, and the information must be marked confidential. However, such an agreement does not release employees from their duty of vigilance in determining the information to be communicated. Transgene may lose the protection of its information or be faced with requests for indemnification if exchanges of information are not documented or if the provisions of a confidentiality agreement are not respected.

COMMUNICATION WITH THIRD PARTIES

Transgene's reputation as a stock-market-listed company is based on providing accurate and consistent information to the public. It is incumbent upon each employee to protect this reputation. Only authorized representatives are entitled to speak in the name of Transgene.

PRIVILEGED INFORMATION AND INSIDER TRADING

Employees may make personal investments and by shares of Transgene or other listed entities of Institut Mérieux, while complying with the laws and regulations for securities markets and stocks. However, everyone must be aware that any investment decision based on non-public information is prohibited.

LEXICON

Group Companies

Represent each domain of activity of Institut Mérieux (in vitro diagnostic solutions, food safety and nutrition, immunotherapy, capital investments and innovation, contract research and manufacturing services).

Bioethics

Means the study of ethical questions which arise from advances in biology and medicine. It provides pathways to resolve ethical problems occurring in all types of clinical situations.

Corruption

Means the intent to act dishonestly or fraudulently, directly, or indirectly, for personal benefit. For example, a person in a position of power is illegally compensated in order to take a decision favorable to the person who is illegally compensating him (her). This is an act of corruption in which both parties are involved.

Entities/Companies

Mean a legal entity that is a subsidiary directly or indirectly held by Institut Mérieux or by a Group company.

Privileged Information

Means any information, directly or indirectly related to Institut Mérieux or one of its subsidiaries, which has not yet been made public by the Institut Mérieux group via an official press release in which, if it were, could influence the share price of a Group company listed on a stock market or the price of associated financial instruments.

Institut Mérieux/IM

Means the duly registered holding company to which belong the various companies.

Institut Mérieux Group

Means the holding company and the companies that are part of the Group.

Money laundering

Consists of disassembling the nature and source of monies originating from criminal activities (such as corruption, terrorism, or drug trafficking). In order to make it appear to be revenue from a legitimate business, without being able to identify the true source.

Personal data

Means any information about an individual, whether identified or identifiable, directly or indirectly, by reference to an identification number or to one of several elements related to that person's physical, physiological, psychic, economic, cultural, or social identity.

Ethics and Compliance Team

This team consists of two members of the legal team, a lawyer, and the General Counsel, who is the main point of contact.

TRANSGENE

400 boulevard Gonthier d'Andernach – 67400 Illkirch-Graffenstaden –

FRANCE Phone: +33(0)3 88 27 91 21 - Mail:

communication@transgene.fr

www.transgene.fr