

# BioInvent Code of Conduct

# 1. Introduction

BioInvent International AB (publ) (“BioInvent” or “we”) is a clinical stage company focused on the research and development of novel, first-in-class immuno-modulatory antibodies for the treatment of cancer, addressing the need for novel treatment options that have the potential to significantly improve patient outcomes.

The reputation of BioInvent and the trust and confidence of our partners, customers, employees, shareholders and other stakeholders is of vital importance to BioInvent and, consequently, it is decisive for the continued success of our business that the organization, including its employees, acts financially, socially and ethically consciously and responsibly.

The purpose of this Code of Conduct is to form a high-level guidance on how we conduct our business, by setting clear standards and expectations on how we act and interact in our daily work and in various business situations.

This Code of Conduct is applicable to the directors of the board and to all employees of BioInvent, including temporary employees, contract employees and agency personnel who work at BioInvent premises or under the direction of BioInvent (directors and employees are collectively referred to as “employees”).

Employees are expected to be aware of, and to conduct his/her activities in accordance with applicable laws and regulations and this Code of Conduct and are required to report incidents of non-compliance.

Managers are responsible for providing appropriate support to enable their teams to understand the requirements of this Code of Conduct and how they should be applied in practice. Management is responsible for providing assurance on these matters to the board of directors of BioInvent.

BioInvent is committed to working only with business partners, who have committed to adhere to standards of ethical behaviour that are consistent with this Code of Conduct.



## 2. Legal compliance

BioInvent and all its employees, shall comply with all applicable laws, rules, regulations and relevant guidelines in its business activities. It is the responsibility of each employee to seek appropriate advice on relevant legal requirements and other legal issues.

### **International Trade**

Employees involved in international business transactions, are expected to be aware of applicable export and import regulations and trade sanctions laws. For such purpose, BioInvent has adopted *Trade Sanctions Guidelines*.

### **Human rights**

BioInvent supports and respects fundamental human rights and recognizes our responsibility to observe and safeguard those rights when we conduct our business. We must ensure that we do not violate the Universal Declaration of Human Rights adopted by the General Assembly of the United Nations and must strive to identify potential and actual negative human rights impacts related to our operations and business partners and act responsibly and forcefully if we identify such risk.

No form of forced labour, involuntary or uncompensated work is accepted or tolerated. Any form of exploitation of children is forbidden and the rights of young must be protected.

### **Bioethics**

BioInvent recognises the principles of the UNESCO Declaration on Bioethics and Human Rights and will give careful attention to ethical implications of our research and development activities. For such purpose, BioInvent has adopted *Bioethics Guidelines*.



## 3. Business ethics and integrity

### Professionalism and zero tolerance on bribery

All business of BioInvent shall be characterized by professionalism and a high ethical standard. BioInvent requires honesty and integrity in all its business and expects the same from all its business associates.

BioInvent does not accept offering or giving money or anything else of value either as an inducement to make, or as a reward for making, any decision favourable to the interest of BioInvent. We must not accept or offer gifts, hospitality or anything of material value that may compromise the independence or judgement of ourselves, a business partner or a third party or to retain an improper business advantage. This includes hospitality or entertainment with a value that exceeds locally established limits, that is not customary or that is otherwise likely to be seen as inappropriate.

Corruption, bribery and unfair anti-competitive actions is not permitted. Business decisions must always be based on the best interest of the company and not on personal considerations or relationships.

To further prevent improper business ethics, BioInvent has adopted *Anti-bribery Guidelines*.

### Anti-money laundering

Money laundering is the process through which proceeds of criminal activities and their true origin and ownership are changed so that the proceeds appear legitimate. To prevent money laundering, BioInvent has adopted the following principles:

- **Business partner due diligence** – The business must know the identity of our business partners and look out for signs of money laundering in financial transactions in dealings with business partners.
- **No cash payments to or from business partners** – The business must not enter into agreements with business partners including cash payments.
- **No payment other than to the contracted business partner** – The business must not make payments (including return payments) to parties other than the contracted business partner.
- **No payments to other country than the country of domicile of the business partner** – Payments to business partners must take place to the country of domicile of the business partner and not to accounts in other countries, including tax havens.

### Inside information

Employees must not use non-public information about BioInvent or its business to influence his or her decision or anyone else's decision to purchase or sell BioInvent securities. To facilitate compliance with applicable listing rules and regulations, BioInvent has adopted an *Insider Policy*.



## 4. Work ethics

The relationship with all employees must be built on mutual respect and dignity. BioInvent recognises the International Labour Organization's declaration on fundamental principles and rights at work and the fundamental conventions adopted by the same.

We believe in the connection between the competence of our employees and the result we achieve. In order to attract skilled people we must offer good working conditions, fair wages and appropriate training. Below follow some key areas of responsibility towards employees:

- All employees shall be treated equally, fairly and with respect and no employee shall be discriminated against because of, for example, ethnic origin, gender, sexual orientation, marital status, pregnancy, parental status, religion, political opinion, nationality, disability, age or union membership. BioInvent does not tolerate any form of harassment or violence in the workplace.
- All employees shall be offered a safe and healthy working environment.
- BioInvent endeavours to continuously develop the professional skills and competence of the individual employee in order for the employee to achieve job enrichment and to succeed.
- BioInvent respects the right of all employees to form and join (or not to join) a trade union at their own choice and to participate in collective bargaining.

To further enhance diversity and equality at the work place and to promote a safe and healthy working environment, BioInvent has adopted *Diversity and Equality Guidelines* as well as *Work Environment Guidelines*.



## 5. Environment, Dialogue, Implementation, and Reporting concerns

### Environment

BioInvent will work actively with environmental issues and consistently endeavour to reduce the use of substances that may be harmful to the environment and ensure that environmental impact is kept to a minimum. BioInvent shall strive to continuously improve the use of chemical substances and other resources effectively so that the company's impact on the environment is minimized in this respect as well.

### Dialogue

BioInvent shall strive to maintain an open communication with those that are affected by our operations, whether they are employees, customers, investors or the public and their representatives. Transparency and openness shall be encouraged, provided that business secrets that might damage the competitiveness of BioInvent and/or relations with customers and partners are not revealed. We shall always strive to respond in a professional and timely manner to inquiries.

### Implementation

This Code of Conduct sets out the main principles of corporate responsibility, but do not aim to address all possible dilemmas that may arise. It is the responsibility of each BioInvent employee to observe and promote these guidelines. Special responsibility rests with all managers. Failure by employees to comply with this Code of Conduct may lead to disciplinary action, including ter-

mination of employment. Managers, under whose supervision misconduct occurs, may also be held accountable.

The CEO is responsible for the implementation of this Code of Conduct.

The board of directors shall periodically exercise oversight of the Code of Conduct and its implementation.

The manager for each department is responsible for undertaking business partner due diligence and for ascertaining that business partners are committed to adhere to standards of ethical behaviour that are consistent with this Code of Conduct.

### Reporting concerns

If you become aware of circumstances that may constitute potential, suspected or actual violations of this Code of Conduct, you are required to report it immediately. This may be done in writing or orally.

A report is made by notifying your closest manager or by contacting any member of management or the board of directors with whom the employee feels comfortable speaking with.

