

# code of conduct

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# A Message from Our CEO

**Dear Rejuveron Team Member,  
Dear Cooperation Partner,**

Welcome to Rejuveron's Code of Conduct. This document is more than a legal requirement: it outlines the high standards of behaviour we expect as our company moves into its next phase of growth.

Rejuveron's aim is to deliver innovation that will help people to live healthier, longer lives. Over the last two years since our foundation in 2019, Rejuveron has continued to grow in this competitive life sciences and biotech sector. We attribute this success to our team's strong track record in drug discovery and development, combining sound scientific insights with life sciences and biotech know-how and an overriding sense of personal accountability. We encourage you to help us grow and nurture our unique talents in the rapidly expanding field of longevity. Our focus is on making therapies happen. Everything we do is embedded in a strong set of values – guiding principles by which we work – and an effective governance framework.

Acting with integrity is a given at Rejuveron. Integrity is essential to establish the trust that forms the foundation for our relationships with cooperation partners, the scientific communities and each other. It is a central pillar for our success in business and for creating and fostering a corporate culture that encompasses mutual respect, as well as teamwork and a partnering mindset. It is up to each of us to build our reputation by holding ourselves to the highest standard of honesty, fairness and integrity.

Our Code of Conduct addresses these values and principles by which we conduct business across borders. It emphasizes our commitment to integrity, amongst our own team and our cooperation partners.

Our Code not only describes those values, but also provides guidance and direction for our daily business efforts. It offers the rules that will help you to make clear and ethical decisions. For all of us, it is a navigation guide and we ask all of you to embrace the rules contained in our Code, implement them fully in your own field of work and take advantage of the provided compliance training.

An essential element of integrity is the commitment to a business environment where everybody feels safe in seeking advice and in raising concerns. Stay curious:

If you have questions or concerns, we strongly encourage you to contact our Chief Compliance Officer - or simply me! Let us all drive change together. In the way we tackle aging. And in the way we trust and rely on each other.

Sincerely Yours,

**Aksana Labokha**  
CEO



# Core Corporate Values: The Guiding Principles by Which We Work

*make it sustainable*

We adopt a holistic approach to our research. We believe that living longer only has a purpose if the way we conduct our research also simultaneously contributes to the well-being of our planet. We're also aware of the fact that drug discovery and development is a team effort – we hence support and encourage each other to open new doors and explore uncharted territory.

*make therapies happen*

Let's do this! At Rejuveron, we create therapies and technologies by translating breakthrough discoveries into longevity drugs with the aim to improve healthy aging and prolong lifespan. We pursue pioneering scientific fields and make courageous and informed choices to create novel medical treatment paradigms. We follow our informed decisions to explore new scientific grounds, even though it might be on an unconventional path.

*make yourself curious*

Always be a beginner and explore the unknown! We believe in always staying modest, embrace scientific progress in related fields and beyond, whilst continuously opening new doors to discover new ways of therapeutic interventions. It is about accepting and learning from others. We are also aware that 99 out of 100 experiments fail. Our prepared minds are therefore ready to endorse serendipitous discoveries.

# Introduction

At Rejuveron Life Sciences AG (“**Rejuveron**”) including our affiliates and subsidiaries worldwide, each of us, individually, and as members of the Rejuveron team, including all full-time team members, part-time workers as well as external consultants acting for and on behalf of Rejuveron or appearing for Rejuveron in typical company roles (“**Rejuveron Team**”) is responsible for acting with integrity every day.

## **Purpose**

The Rejuveron Code of Conduct is the “Magna Carta” of our Compliance Management System. Reading, understanding, adhering to and abiding by our Code of Conduct (“**Code**”) helps each and everyone of us to conduct daily business activities in accordance with the highest ethical, legal and professional standards. To that end, our team members will be provided with a copy of the Code. All our team members must read, understand and comply with both our Code as well as any internal policies referenced herein. All new members of the Rejuveron Team shall be provided with a copy of the Code of Conduct as well as appropriate compliance training at the earliest date possible after their engagement.

In addition, we must abide by the legal standards, country laws and regulatory requirements applicable to our business. Wherever and whenever a conflict between our Code and a specific local law arises, the stricter version shall prevail. Beyond compliance with laws, regulations and internal policies, our team members are expected to carry out their duties with the highest standard of care, integrity and professionalism when performing their work.

Anyone, including our cooperation partners, contractors, suppliers or any other third party acting on our behalf or in our name through business activities shall have access to the Code on demand, and are expected to adhere to the same standards.

Our Code has been approved and adopted by Rejuveron’s Board of Directors. Any amendment to our Code requires the approval of the Rejuveron’s Board of Directors. The Chief Compliance Officer shall act as its custodian.

Although our Code may not foresee every situation encountered in the course of our daily work at Rejuveron, it is designed to help us make sound and ethical decisions in accordance with applicable laws and regulations, internal policies and our core corporate values. Therefore, our Code aims at guiding you in your daily business activities.

## Applicability

All Rejuveron team members, all members of the Board of Directors, all officers at Rejuveron and Rejuveron's subsidiaries (i.e., Endogena Therapeutics Inc., Rejuveron Senescence Therapeutics, Rejuveron Vascular Therapeutics, Rejuveron Biomed Therapeutics and all future subsidiaries) must comply with our Code. Additionally, all Rejuveron cooperation partners, contractors, suppliers, customers, and other third parties acting on behalf or in our name through business activities are also required to act in line with our Code.

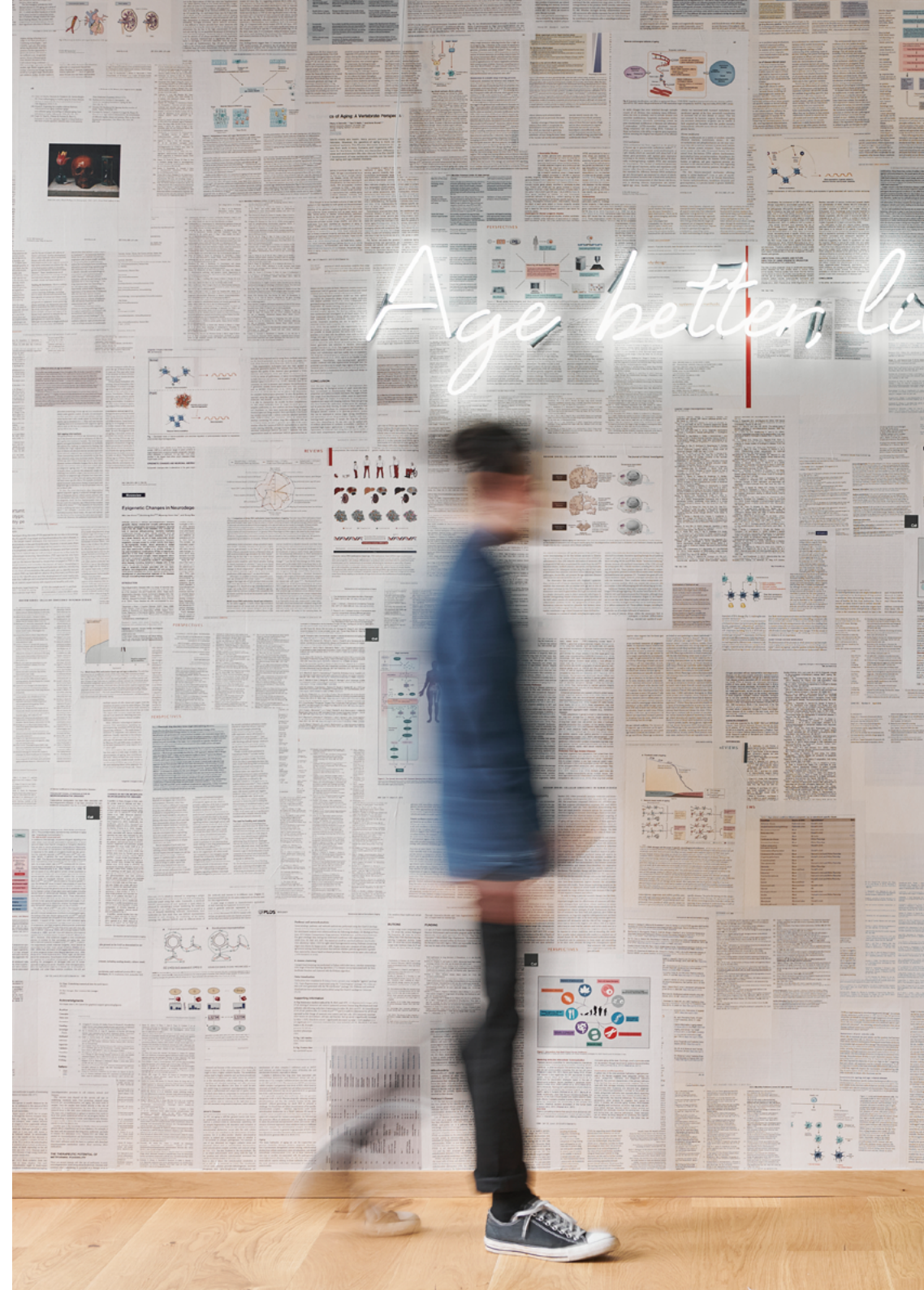
## Communication and Training

In order to help our team members understand their responsibilities under our Code and other internal policies, they must receive introductory and regular compliance training.

## Violation of our Code

We must all adhere to and comply with our Code. Violations of our Code, internal policies or the law can entail serious consequences for our company as well as for the individuals, including but not limited to disciplinary action, termination of employment as well as possible civil and criminal penalties.

**We must all adhere to and  
comply with our Code.**





*Q&A - Feeling unsure in an everyday business situation?*

We may face situations that are not explicitly covered by our Code. If that is the case and you are unsure about a certain situation, you should ask yourself the following questions:

- Could the conduct in question be viewed as dishonest, unethical or unlawful?
- Could this conduct hurt Rejuveron's reputation in the event that it became public?
- Could this conduct cause Rejuveron to lose credibility with our cooperation partners, investors or scientific communities?
- Could this conduct hurt other people such as other team members, cooperation partners or investors?

If your answer is **yes** or **maybe**, you have identified a potential issue that you **must** report to the Chief Compliance Officer or to our Rejuveron Compliance Helpline.



# Where to Go for Help?

At Rejuveron, everyone should feel comfortable to speak up, come forward and report concerns or allegations of misconduct.

## **Speak-up Culture and No-Retaliation Policy**

It takes courage to come forward and raise your concerns. Therefore, anyone should feel comfortable to speak up, raise and report their concerns. We do not and will not tolerate retaliation or reprisal of any form against anyone who reports their concerns in good faith.

## **How to reach out for help**

Our Code is meant to be a guide for all of us, but the story it tells is not exhaustive and our Code can therefore not provide an answer for every question.

Do you have a concern, problem or a question about our Code, internal policies or a specific situation?

Should you become aware of a situation in which you are certain or you suspect that our Code or the law has been infringed, you have the duty to Rejuveron and to your colleagues to report the said situation in order to protect both the interests of our company and the ones of your colleagues.

We will be glad to answer your questions if you contact us personally. Your concerns will be managed promptly and in an appropriate manner. We will thoroughly investigate reports whilst maintaining strict confidentiality and will ensure anonymous treatment, if you so request to the extent possible and as required by law.

You have several ways to report or seek advice, such as through an in-person meeting with the Chief Compliance Officer as well as through virtual meeting and via telephone, website, email, post, etc. Further, our Rejuveron Compliance Helpline can be called at any time.



Chief Legal Officer  
Chief People Officer

**Karim Allam**

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compliance helpline

**Q** - You have been thinking about calling our Compliance Officer, but you are not sure if you really should. Your supervisor told you in private during a negotiation with a customer to do something that you feel is dangerous and may even be illegal. You think you should tell someone who can look into this, but you are afraid that your supervisor will make your job difficult for you to do. What should you do?

**A** - You have identified what you believe might be a potentially serious matter. Our Code says that if something does not feel right, you need to speak up. Your supervisor is often the best person to first raise your concerns but because it is – in the present situation – your supervisor’s request that concerns you, your choice to call our Compliance Officer or our Rejuveron Compliance Helpline is a good option. If you report the situation in good faith, we will look into the situation carefully and will not tolerate anyone retaliating against you. So please do the right thing and speak up!

Q&A - What happens if?

# Our Commitment Towards Each Other in the Workplace

As our team members are our greatest asset and key to our success, we strive to ensure that everyone is treated with respect, courtesy, honesty, consideration, fairness and dignity at our workplace.

## **Diversity, Anti-Discrimination and Anti-Harrasment in the Workplace**

At Rejuveron, we encourage diversity in our workforce. We strongly believe that diversity brings many unique ideas, talents, points of view and values that positively contribute to the success of our company. We provide equal employment opportunities and strive to ensure a respectful environment. We therefore do not tolerate discrimination, favoritism or harassment on the basis of race, gender, gender expression, age, ethnic or social background, culture, national origins, religion or creeds, disabilities, sexual orientation and marital status. These principles extend to all employment decisions including but not limited to recruiting, training, evaluation, promotion and reward. Any discrimination or harassment actions will entail corrective actions against the perpetrator, including the termination of employment.

Additionally, we are also all entitled to work in a harassment-free environment. Harassment is a form of discrimination consisting in an unwelcome behaviour that has the purpose or effect of creating an intimidating, hostile or offensive work environment. Harassment is a shapeshifter and can take many forms, including physical actions, verbal or written remarks or visual depictions. Rejuveron strictly prohibits any act of harassment, whether originating from a colleague or from a third party outside of our company.

## Examples of unacceptable and inadmissible behaviors

Discrimination	Favoritism	Sexual Harassment	Harassment
<p>Refusing to hire or to grant fair terms and conditions</p> <p>Refusing to renew a contract based on: race, gender, religion or creeds, nationality, ethnic or social background, culture, sexual orientation, marital status, world view, physical appearance or any other aspects of personal status, gender and gender expression</p> <p>Limiting work opportunities</p> 	<p>Giving preferential treatment to friends or family members regardless of their qualifications</p> <p>Having a preferred background (race, gender, nationality, culture, etc.) when hiring someone</p> 	<p>Verbal communications such as suggestive comments or unwanted jokes unwanted invitations to go out on dates</p> <p>Physical contact such as assault, unwanted patting, grabbing, touching, leaning over, cornering, pinching, kissing, etc.</p> <p>Visual displays such as drawings, computer images, written documents, etc.</p> 	<p>Threatening, yelling, insulting language or actions or cursing to intimidate or destabilize some-one, etc.</p> <p>Unfair treatment</p> <p>Negative comments about a team member's religious belief, etc.</p> 

## Q&A - What does this mean?

**Q** - You are looking for a candidate to hire as Investor Relations Associate. You ask yourself whether you can consider only male candidates due to the fact that female candidates could possibly have absence periods due to maternity leave.

**A** - You are not allowed to exclusively search for male applicants nor may you reject applications from female candidates just because they are female. This decision-making reasoning is discriminatory as it is based on gender. Your search must be focused on the qualifications, skills and work experience of the candidates and how they meet the essential criteria of the considered positions, regardless of their gender.



## Safety and Health in the Workplace

Rejuveron makes safety and health a high priority. We are therefore committed to Rejuveron makes safety and health a high priority (“Safety Culture”). We are therefore committed to provide a safe workplace for all team members. Our team members have the duty to comply with health and safety measures, follow the relevant regulations and work instructions and use protective gear, clothing or equipment as required by law or Rejuveron’s policies. While conducting business on behalf of Rejuveron or its subsidiaries, everyone must all be free from the influence of alcohol, drugs or other substances that can impair our ability to work safely and effectively in the interest of our company, colleagues, business partners and customers and cause addiction. Additionally, threats or acts of violence in our workplace are never to be tolerated.



**Q** - You are required, at work, to wear protective garments in order to protect yourself and others. You arrive late at work and forgot to get your protective gear stored in the changing room of the other building. As you would need another 15 minutes to get to the changing room, you are tempted to exceptionally work without wearing your protective gear.

**A** - You cannot exempt yourself from wearing your protective gear. You are expected to fully comply with our safety regulations and policies. You must therefore always wear the required protective gear without exception. Consequently, you must retrieve and wear your protective gear before starting work regardless of the circumstances.

*Q&A - What happens if?*

# Our Commitment to Integrity in International Business

## **Anti-Bribery and Anti-Corruption**

We believe in working ethically and with integrity. In particular, Rejuveron must be compliant with all applicable anti-corruption and anti-bribery laws. We therefore strictly prohibit any and all forms of bribery and corruption and will not tolerate any business conduct susceptible to creating the perception of improper influence.

Bribery and corruption are shapeshifters and can take many forms. Due to their broad interpretation, bribery and corruption may include anything that would be valuable, interesting or useful to the recipient and include but are not limited to tangible items or economic value.

Anti-corruption laws, including the U.S. Foreign Corrupt Practices Act of 1977, the UK Bribery Act of 2010 or the French Loi Sapin II of 2016 apply to our entire international business activities due to their extraterritorial reach. Violation of these laws could subject both Rejuveron and the individuals involved to very serious and severe consequences such as civil and criminal penalties.

Our philosophy is very clear: Do not bribe or be bribed! We must not engage in bribery with or authorize, offer or accept any form of kickback to or from a government official or a private commercial counterparty.

**Our philosophy is very clear:  
Do not bribe or be bribed!**

**Q** - You are flying overseas to meet a cooperation partner in order to negotiate a scientific cooperation agreement. You are on a tight schedule and, at your arrival at the airport, the immigration officer kindly offers you a fast-track treatment in exchange for a mere USD 40.00 cash payment. As you are already on a tight schedule and it would take you another hour to get through customs, you are considering accepting his offer.

**A** - Even if you risk being late to your business meeting, you cannot pay this government official the requested payment facilitation. This might very well be regarded as bribery under certain legislations such as the UK Bribery Act 2010. In this regard, many international companies and plenty of immigration and customs officers worldwide were accused and found guilty of corruptive actions in similar cases.

## Gifts and Hospitality

Do not give or receive anything inappropriate! At Rejuveron, although we are aware that exchanging gifts and hospitality invitations may foster goodwill and promote sound business relationships, we do not offer nor accept gifts and hospitality invitations susceptible to creating the reality or the perception of improper influence. As a result, in order to avoid even the appearance of improper relations with, or influence over third parties or potential third parties including but not limited to business partners and customers, all Rejuveron's team members must adhere to the following principles:

- Do not solicit gifts or hospitality invitations from any current or potential third-party. Gifts do not only include merchandise but all kinds of material or immaterial advantages.
- Do not accept or offer any gifts or entertainment when they exceed common courtesy, social adequacy and well-established local business practices. The value of any gift or hospitality invitation must not raise any question of an obligation on the part of the recipient. Bearing third party travel costs will be exceptionally acceptable only within a clear business context excluding spouses and family members.
- Do not give or receive cash or cash-like gifts such as vouchers.
- Do not give or receive advantages while being in ongoing business negotiations, tender processes, contract award proceedings and the like with third parties.
- Do not offer advantages of any kind to public or government officials without the prior approval of our Compliance Officer.

If you are unsure as to whether you should accept or give a gift or entertainment, consult our Compliance Officer and abide by the proposed decision.





**Q** - While negotiating fees, one of our Key Opinion Leaders offered me a ticket for a top basketball match I have been eyeing on ever since the basketball season started. Can I accept the ticket?

**A** - No. In most instances, Rejuveron's team members are not allowed to accept gifts or entertainment from any individual or company while being in business negotiations, tender processes and the like without prior approval from our Chief Compliance Officer.

**Q** - A salesperson from one of Rejuveron's laboratory equipment suppliers brought chocolate and notepads as Christmas gifts to our office. Can I accept these gifts and share them with my colleagues?

**A** - Yes, you can, assuming that these branded gift items are within customary business practice and not exceedingly lavish.

*Q&A - What happens if?*

## Q&A - What happens if?

**Q** - A key Rejuveron cooperation partner is having a dinner party to celebrate his research institute's anniversary. BigPharma executives and government officials will also be there. Am I allowed to accept the invitation?

**A** - Yes, provided that you have obtained our Chief Compliance Officer's approval and that you have made it clear that you accept the invitation as a Rejuveron representative. Likewise, you must also receive our Chief Compliance Officer's prior approval if you want to bring a gift to this event.

**Q** - A supplier has invited my family and me for a golf weekend as a "thank-you to a long-standing business partner". May I accept?

**A** - No. The value of the trip would go beyond normal courtesy. Accepting the invitation could compromise your own individual and our company's independence and impair free decision making.



## Fair Dealings

At Rejuvenon, we strive to outperform our competition fairly and honestly. We therefore expect our team members, in all regions and countries where Rejuvenon conduct business, to compete vigorously but fairly without using deception or misrepresentation to gain an unfair advantage over anyone. To ensure that the best interests of our customers are served and that our Company's dealing with markets remain open and transparent, we commit ourselves to adhering to all relevant national and international antitrust laws and regulations in the markets where we operate. As a result, we must never:

- Exchange sensitive information, e.g. on pricing, with direct competitors.
- Abuse of dominant position; in particular regarding market and region.
- Enter into horizontal agreements, understandings or coordinated activities with actual or potential competitors to:
  - Fix research data, prices, premiums, rebates or specific elements thereof.
  - Limit or restrict the kind or the quantity of drugs, therapies, combined solutions or services supplied.
  - Allocate markets geographically or according to cooperation partners, industry segments, therapy groups or pharmaceutical product lines.
  - Enter into vertical agreements or arrangements with companies operating at different levels in the value chain such as distributors or suppliers that have the purpose or effect of eliminating or lessening free and fair competition.

Antitrust laws violation could subject both Rejuvenon and the team members involved to substantial criminal penalties and civil damages.

**Q** - A representative of another life sciences company – a direct competitor – called me and asked me to a meeting in another country about “rationalizing” the better aging market for a longevity therapy we both offer. The “rationalizing” shall not take place in Switzerland or in the EU. Could I join the meeting abroad?

**A** - No! You must immediately contact our Chief Compliance Officer. Attending a “rationalizing” meeting could constitute a very serious criminal conduct. Any interaction between competitors may give the appearance of anti-competitive agreements. Do not be fooled by coded words such as “rationalizing” or meeting in another country. Such a meeting can still break Swiss, EU, US and many other countries’ antitrust laws even if the meeting takes place in another country. Additionally, international antitrust enforcement agencies increasingly scrutinize collusive activities and already penalize the sheer possibility of cutting customer rights by way of illicit information exchange.

*Q&A - What happens if?*

Q&A - What happens if?

**Q** - You are participating in a life sciences conference. In the evening, you are approached by a representative from a direct competitor who asks you how Rejuveron's business is doing. After a drink or two, he proceeds to ask very targeted questions about our drug and therapy solutions and our pricing strategy. How should I respond?

**A** - Politely refrain from giving any specific details, direct these questions to be answered going through our company's website. While you can discuss general market developments or publicly available standards, you must avoid talking about concrete numbers, in particular about research results, prices, capacities or volumes. Do also not share our science, intellectual property, business strategy or plans with competitors. Revealing such information would likely infringe your Rejuveron confidentiality obligations. Further, such information could be used to keep market price levels artificially high. In any case, you should report this situation to our Chief Compliance Officer immediately.

## Anti-Money Laundering

Rejuveron complies with all relevant national and international laws and regulations relating to money laundering. We are fully and deeply committed to the international fight against money laundering, terrorism financing and drug trafficking. We are also well aware that money laundering often goes hand in hand with other illegal activities such as corruption or tax evasion. We therefore aim at conducting business only with well-respected business partners and customers who are involved in lawful business activities and whose funds are derived from legitimate sources. Our team members must fully comply with and abide by all applicable anti-money laundering laws and internal procedures designed to identify the third parties we conduct business with, detect and deter suspicious customers and forms of payment or other transactions susceptible to involve money laundering, terrorism financing or drug trafficking. We apply demanding risk-based due diligence to retrieve quintessential standard information about ultimate beneficial owners (UBOs).

We never conduct payment transactions in cash, nor do we transfer payments to bank accounts in US- and EU-embargoed countries. Transfers to privately held bank accounts are also prohibited.

**We never conduct payment transactions in cash, nor do we transfer payments to bank accounts in US- and EU-embargoed countries.**

Q - A new customer asked me to accept payments from multiple bank accounts – e.g. domiciled in the British Virgin Islands or in Cyprus – with multiple payment types such as cheques and cash. What should I do?

A - This is a clear sign of suspicious behavior potentially involving money laundering. You should immediately consult our Chief Compliance Officer. You should only take further steps in this transaction including accepting payment from the counterparty after our Chief Compliance Officer has advised you on how to proceed, if any payment acceptance is to take place at all. This enables us to take the required legal steps in a timely manner and protect our company from administrative fines for not identifying and reporting money laundering to the competent authorities.

Q&A - What happens if?



### Third-Party Relationships and Business Partners

At Rejuveron, we are involved with business partners with expertise in various areas such as clinical research organisations, key opinion leaders, health care professionals or accountants and law firms. As choosing the right business partners is key to any business relationships, we must not select and retain third parties to do something that we are not allowed to do ourselves. Indeed, misconduct of third parties can be attributed to Rejuveron and must be prevented. Moreover, as we rely on our business partners, they must be selected and engaged in compliance with our Code and should fully comply with the principles set out in our Code.

Additionally, as a result of our life sciences business environment, we must often engage third parties typically known as healthcare professionals. Such healthcare professionals refer to any individual operating in the medical, dental, pharmacy or nursing community who may prescribe, purchase, recommend, research, supply or administer a medical or pharmaceutical device, other medical products, drugs or therapies. Particular care and attention must be given when engaging a healthcare professional to act on Rejuveron's behalf due to their influential position in our scientific communities and the biotech industry. Oftentimes healthcare professionals are public healthcare officials in their respective countries because they are working in healthcare institutions in which the central, regional or local government owns an interest or have control or which are paid partly or as a whole by the government. Therefore, when in doubt, a healthcare professional should be treated as a public healthcare professional and therefore as a public official in order to comply with the relevant regulations in tgis area.

Q&A - What happens if?

Q - Adverse market conditions are making it difficult to meet your research targets. An independent life sciences consultant approaches you and claims to be well connected through powerful research channels and to have special expertise in the longevity drugs market. He guarantees you to achieve your research targets if you let him do whatever needs to be done (no questions asked and no written contract required). Your research challenge will be solved provided the payment of a "decent fee" will go to a bank account in Panama. He appears to be knowledgeable, experienced and very competent. Should you hire him?

A - Be extra careful! This situation has three red flags pointing to corruptive behaviour and must not be ignored: His "guarantee" combined with his oral-agreement-only request as well as his bank account in a notorious tax haven clearly shows that this third party might bribe decision makers to win additional business. Law enforcement agencies are fully aware of the critical role that third parties sometimes play in unduly influencing markets. Do not enter into any agreement with such third party without prior due diligence and report to our Chief Compliance Officer.



# Our Commitment to Our Shareholders

## Conflicts of Interest and Duty of Disclosure

Rejuveron's reputation heavily depends on our free and untainted decision-making processes as well as our team members' integrity. It is therefore of the utmost importance that we avoid any relationship or activity that may compromise, or even appear to compromise, our ability to make objective and fair business decisions in the workplace. You must ensure that you make decisions and do business in the best interest of the company and not based on your own personal interests (such as family, friendships, financial or social factors) when performing business activities for Rejuveron. Consequently, you are prohibited to use any company property, information, position or opportunities arising from these for your personal gain or to compete with or tarnish Rejuveron's image. Likewise, you should not engage in any business activity or operation that could compete with or be detrimental to Rejuveron's business operations.

Additionally, all team members have the duty to immediately disclose and inform the Compliance Officer of any personal interest that might conflict and hinder the execution of their professional duties.

Although we do not intend to impose limitations of private activities e.g. in city councils, or sports clubs, we expressly prohibit all direct or indirect engagement – including consulting for as well as significant equity investments above 5-% or other financial interests – in direct Rejuveron competitors, customers or business partners. However, and for the avoidance of doubt, mere financial portfolio investments shall not be considered conflicting activities with the company's business.

**You must ensure that you make  
decisions and do business in the  
best interest of the company**



**Q** - You notice that a laboratory testing equipment supplier has delivered a defective testing device. You know that the device's warranty period has not yet expired. However, your in-laws own the supplier company and you think about leaving the defect unremedied.

**A** - Your private relationship to the supplier must not influence your decision-making process. You must always act in Rejuveron's best interest. You must disclose your personal relationship with the supplier to the Chief Compliance Officer so that another Rejuveron team member can manage the issue as of taking the proper steps in order to handle the defective product, regardless of the fact that the supplier is owned by your in-laws.

*Q&A - What happens if?*



Q&A - What happens if?

**Q** - A stock-listed life sciences laboratory equipment supplier approaches you confidentially and informs you that they plan on introducing a new measuring device onto the market. Although this solution is of no use to you, you think it will constitute a real breakthrough for other life sciences companies. You are convinced that once the supplier finds a market, its share price will skyrocket. Are you allowed to buy securities of the supplier's company?

**A** - You are not allowed to buy any securities of the supplier's company until it is publicly released. Indeed, this otherwise constitutes an "insider's information" because the introduction was and remains confidential as there has not yet been full and fair public disclosure. The information is "material" because a reasonable investor would probably consider the information important when deciding whether to invest in the company.

## Insider Trading and Directors' Dealings

Rejuveron commits to fully comply with all applicable insider trading laws including, but not limited to US regulations supporting open and fair securities markets worldwide.

Insider trading occurs when securities of a given company are being traded (i.e. bought or sold) on the basis of material or non-public information that we have acquired through work we have done on behalf of Rejuveron. Our team members are strictly prohibited from trading in securities on the basis of Rejuveron's insider information or any other publicly traded company in direct business relationship with Rejuveron. Insider trading laws do not only prohibit trading in securities on the basis of insider information but also the sharing of such information with or the "tipping" of third parties. Violation of insider trading laws are taken very seriously worldwide and include sanctions such as imprisonment and heavy fines.

Additionally, the members of the Rejuveron Board of Directors and the Executive Management Board are required to report dealings in Rejuveron shares and related financial instruments, especially derivatives and emission certificates. This statutory requirement also applies to persons and legal entities closely related to the members of the Rejuveron Board of Directors or the Executive Management Board.

**Our team members are strictly prohibited from trading in securities on the basis of Rejuveron's insider information**

## Data Privacy and Personal Information

Preserving the privacy of personal information is important to us as such information can directly or indirectly reveal a person's identity. We therefore respect the privacy of our team members as well as anyone with whom we conduct business. To that end, we comply with all applicable privacy laws including the European Union General Data Protection Regulation (GDPR; Art. 3 para. 2 GDPR) as well as the Swiss Federal Act in Data Protection (DPA).

In order to conduct business as well as develop and improve our therapies and technologies, we are entrusted with our colleagues, patients and any other third parties' personal information. Additionally, we might also have to exchange personal information with third parties. In these circumstances, Rejuveron will not only ensure confidential treatment under specific confidentiality agreements but also review whether the third parties we do business with are actually able to protect personal information.

Finally, we will ensure to protect the integrity of our information systems and prevent cyber security attacks compromising our critical structures.

**We therefore respect the  
privacy of our team members as  
well as anyone with whom we  
conduct business**

## Every team member shall help to protect Rejuveron by:

- Carefully using information systems and email whenever sending and storing personal information.
- Not exchanging personal information without prior authorization and/or confidentiality agreements.
- Securing all personal, confidential and proprietary information on access-protected storing facilities.
- Treating personal passwords and access codes with utmost confidentiality.
- Locking physical, personal, confidential and proprietary information safely in designated spaces.

*Q&A - What happens if?*

**Q** - An unknown marketing agency calls me and tries to engage in a discussion about a new vitamin product. As the discussion progresses, the caller tries to explore individual and personal data. Should I keep going and trust the oral confirmation according to which all my answers will be treated confidentially?

**A** - No. Be very careful with these “phishing” and “vishing” attempts. They often come in the guise of presumably unsuspecting market research. You must therefore refrain from exchanging personal, proprietary and confidential information and you must ask for a written information request and inform our Compliance Officer.

**Q** - I was inadvertently emailed documents containing names of participants to a research trial programme as well as information pertaining to their health. Should I just ignore the email and forget the data I saw?

**A** - No. If you were able to access this data, anyone could also access it although they are not authorized to. You must report to our Chief Compliance Officer to help make sure that protections are set up.



## Information Systems and Emails

Our team members' conduct and integrity directly impact our reputation. Email accounts and internet access are provided for business purposes only and we discourage the use of company information systems for private purposes. Thus, using or copying software from Rejuveron information systems for private purposes as well as installing private software at our workplace is prohibited. However, occasional, limited and appropriate personal use of Rejuveron communication systems is permitted when the use does not interfere with the user's work performance or violate any provisions of this Code or any other Rejuveron policies.

Additionally, the usage of private email accounts as well as any private SMS, smartphone communication or messenger "Apps" for business purposes is expressly prohibited. Moreover, you must not under any circumstances abuse Rejuveron's information systems, internet access, email accounts or any other information and communication media for illegal or unethical purposes. Searching, downloading or forwarding of information with content of a racist, sectarian, propagandistic or pornographic nature as well as glorifying violence is regarded as particularly abusive and can lead to severe sanctions.

You are expected to apply the same standards of care and customary handling as in hardcopy communications when sending and receiving emails and attachments on your Rejuveron email account.

You should always bear in mind the potential consequences if such information were to become public e.g. in the course of a business opportunity. Therefore, you should be mindful as to how you present yourself online, in particular on social media networks. Only those colleagues designated by Rejuveron have the authority to speak on behalf of the company. If you identify yourself as a Rejuveron team member, you must make clear that you are not speaking on behalf of the company but for yourself and privately.

**Q** - A cooperation partner suggests that I no longer use my Rejuveron email account to communicate with them and instead use a new messaging application that they have on their smartphones for convenience purposes. Should I agree?

**A** - No. You must remind them of our company standards. Many new communication or messenger applications no longer store communications and might therefore compromise our legal duties to document our business communications.

**Q** - You draw a copy of a Microsoft Excel installer file on a USB stick and plan on installing it on your personal laptop at home. You think that it would not harm Rejuveron because the original master file remains on the company system. Can you go through with it?

**A** - No. When Rejuveron purchases a software, it is usually bound by a license agreement with the software manufacturer. Therefore, using the software for private purposes will most likely infringe the agreed-upon license agreement and Rejuveron could be held liable for the acts of its team members.

*Q&A - What happens if?*

Age better, love



Q&A - What happens if?

**Q** - In a train, when I commute to work, I sometimes have to take work-related phone calls. Can this be compromising?

**A** - Yes. You must therefore be extremely careful not to discuss non-public company information in public places, such as cabs, trains, planes, elevators or at life sciences conferences and trade shows. When it is absolutely necessary to conduct a phone call in a public place, always be mindful of your surroundings

## Protection of Company Assets

Protecting our company assets is one way to protect Rejuveron, each other and our customers. All team members are expected to protect our assets i.e. all physical, intellectual property and financial assets and ensure their use for legitimate business purposes.

Rejuveron regularly generates valuable, non-public ideas, trade secrets, know-how, inventions, copyrights, patents, trademark, technology, strategies and other kinds of business information. As we own these elements, we must protect them as intellectual property. Such information contributes, allows us to and reinforces our competitive advantage in the biotech industry.

Additionally, we must protect all our Rejuveron confidential information such as pricing, financial data, acquisition and divestiture opportunities, customer information, market data, trial participants and other proprietary information. Moreover, it must also protect confidential information that our customers, business partners and suppliers have entrusted to us. It is prohibited to disclose confidential information to anyone within or outside Rejuveron unless the information is generally needed for the recipient to carry out their assignment as a Rejuveron team member. Likewise, such confidential information must not be disclosed to third parties who have not been duly (e.g. via a non-disclosure agreement) authorized to receive such information.

Our physical assets such as raw materials, products, equipment and research facilities are key to performing our daily business activities.

You are responsible for taking all necessary and reasonable steps to prevent the damage, waste, theft and misuse of our assets whether they are physical, intellectual property or financial assets as well as the ones entrusted to us by third parties.

## Accurate Financial Recording

We must manage our business well to ensure our success in the long term. Therefore, truthful financial recording is a must in order to openly, clearly and effectively communicate financial information to capital markets. This principle equally applies not only to relationships with shareholders, customers, business partners, team members but also with the public and all governmental offices.

Accurate business records and proper retention of our financial documents and records are essential to our business operations. As such, all documents, files and other covered communications must be maintained in accordance with our internal policies. Moreover, the U.S. Foreign Corrupt Practices Act as well as an ever steadily increasing number of international anti-corruption laws unanimously require the maintenance of accurate accounting records in which all company transactions must be properly recorded.

In addition to financial records, all team members must watch for suspicious transactions and inaccuracies in recording and report them. Original data must be recorded exactly and cannot be rounded (outside of specifications), guessed or altered in any way. Data integrity requires that records be attributable, legible, contemporaneous, original or true and accurate. Therefore, extra care should be given to the following records: financial, manufacturing, quality, research, business expenses such as meals with customers as well as records filed with government agencies. Intentional acts of misrepresentations by team members that may conceal or obscure the true nature of a business transaction are clear violations of the present Code.

**Data integrity requires that records be attributable, legible, contemporaneous, original or true and accurate**

**Accuracy, completeness, honesty and reliability of financial and non-financial records and reports are crucial for our:**





Finally, the failure to keep complete and accurate books and records not only goes against Rejuveron's standards, internal policies and guidelines but also infringes applicable laws. As a result, we must be honest, sincere and transparent about our business operations and performance as well as accurate in the recording and reporting of financial information.

**Q** - It is the last week of the quarterly reporting period. In order to ensure that your team meets the forecast cost targets, you are requested to record the cost of a joint research agreement to be finalized the week after the quarterly reporting period. It seems harmless to you. Should you proceed with the request?

**A** - No. Costs and revenues must be recorded in the correct time period. As the license agreement is not yet complete, proceeding with the request would be a misrepresentation and could amount to fraud if such revenue were to be included in an earlier period.

Q&A - What happens if?



# Our Commitment as Corporate Citizens

## Human Rights

Rejuveron is committed to fully comply with and respect Human Rights as well as employment laws in order to prevent modern slavery (such as coerced, forced or compulsory labor, child labor, domestic servitude, human and sex trafficking and workplace abuse) at our workplace, at third parties (e.g. suppliers) and in the markets we conduct business. In particular, we comply with the Universal Declaration of Human Rights, the 10 UN Global Impact Principles and the UN Guiding Principles on Business and Human Rights (UNGPs) as well as the Fundamental Labor Rights set up by the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Additionally, we strive to prevent and limit adverse human rights impacts through our activities. We also seek to remediate adverse human rights we may have inadvertently generated.

We will not tolerate any human rights violation or accept modern slavery as set-in-stone practices.

## Community Engagement

Rejuveron strives to be recognized as a trusted corporate citizen. Therefore, we fulfill our duties towards society as well as the communities within which we operate. We contribute to the communities in which we do business through investment and engagement. We are also committed to building relationships based on trust, integrity and mutual respect with all our stakeholders in these communities. We ask our team members to respect people as well as our planet and to always consider and have in mind the short- and long-term impacts made to the community and the environment when making business decisions.

## Transparency and Cooperation

Rejuveron maintains a transparent information and communication policy. Additionally, we act in a cooperative manner with investigating authorities within

the framework of legal obligations and reciprocally, we expect that the relevant procedural rules are observed in any and all official business operations.

## Treatment of Animals

Rejuveron commits to the respectful and ethical treatment of research animals and to comply with all the relevant laws in order to protect animal welfare, for both in-house activities and for those with external research organisations (CROs and academic institutes).

All team members involved in conducting animal studies must be qualified and trained accordingly. Moreover, whenever possible, acceptable regulatory authorities and scientifically valid, alternative research methods should be looked for and preferred over.

## Environment

At Rejuveron, we act in a responsible and environmentally-friendly manner. To that end, we ensure to avoid the use of hazardous substances whenever and wherever possible. Further, we are committed to meet our environmental responsibilities. Moreover, in order to preserve our planet and future generations, we must continuously strive to fully comply with all applicable legal and regulatory requirements including internationally accepted environmental standards.



# Our Commitment to Our Code

We expect all our team members to be guided by the letter and spirit of this Code. To that end, all team members are supplied with a copy of the Code upon employment and are required to review and sign an acknowledgment in this regard.

Therefore:

- You have read and understood our Code.
- You have the opportunity to ask questions about the Code at any time.
- You agree and comply with the standards set forth in our Code.
- You are aware of your importance in protecting our company and our colleagues by promptly speaking up in good faith when necessary as well as reporting cases of violations of our Code.
- You keep a personal copy of our Code.
- You will actively participate in the compliance training based on our Code.
- You are able to put our Code into context with regard to your individual business role.
- You convey the standards of our Code to our customers, business partners, and suppliers.
- You are prepared to cooperate in internal and public investigations of such violations.

