

# CODE OF CONDUCT

Egetis Therapeutics AB

*We care  
for the rare*

EGETIS  
THERAPEUTICS

2025

## MESSAGE FROM OUR CEO

**At Egetis, we strive to create value for shareholders, patients, and society by developing and making available a portfolio of unique products for the treatment of rare diseases; in short,**

### ***“We Care for the Rare”***

To highlight the common principles which form the foundation of everything we do, what we strive towards and how we work together, our leadership team together with our employees have developed a set of corporate values for the future, our **“Triple C’s”**:

**Courage** – We challenge the status quo for the benefit of the patient.

**Commitment** – We operate with high ethical standards through an efficient organization to deliver top quality results.

**Collaboration** – Through trust, we work seamlessly across functions and with external partners.

With our core values as a foundation, this Code of Conduct sets out the over-arching legal, ethical and professional framework with principles and standards which each person involved in the work at Egetis (including the board of directors, our leadership team, our employees and all consultants working with us) needs to know and adhere to. We are all collectively and individually responsible for adhering to the principles and complying with the standards outlined herein.

We must always remember that the business decisions we make daily not only impact our lives, but also the lives of patients and their families. We must always conduct ourselves in a manner that fosters the continued trust of our colleagues, patients, customers, business partners and community. This Code of Conduct is designed to help you achieve that end.

Please take time to review this Code of Conduct, ask questions, and consider its application as you pursue your work. Since this Code of Conduct will not anticipate all situations with legal or ethical issues, all of us are also expected to use our judgement and common sense in approaching our respective business challenges.

With gratitude for your ongoing courage, commitment, and collaboration,

**Nicklas Westerholm**  
**CEO**

**Nicklas Westerholm, vd**  
Egetis Therapeutics AB



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# INTRODUCTION

## What is the Code of Conduct and Why Is It Important?

At Egetis, we aspire to be recognized as a reputable company leading in the treatment of serious rare diseases with significant unmet medical needs.

We all share the responsibility to live our “Triple C” values (Courage, Commitment, Collaboration) every day. By demonstrating and supporting ethical behavior, we positively impact the culture of Egetis.

This Code of Conduct is designed to help each of us understand our responsibilities within the legal and regulatory environment in which we operate. The Code of Conduct cannot provide guidelines for every situation and is to be read in conjunction with all other Egetis policies, operating procedures, and guidance, all of which outline the Company’s requirements and expectations for behavior in important areas.

## Who Needs to Follow the Code?

Every Egetis director, officer, employee, consultant and contractor is responsible for complying with this Code of Conduct.

If you are managing a third-party doing business on our behalf, you are responsible for ensuring that the third-party is informed about the principles set out in our Code of Conduct and that they adhere to it or similar principles by virtue of their own code of conduct.

## What Are Our Expectations?

As a member of the Egetis team, we are all expected to:

- Act with good judgment, high ethical standards, and honesty in your business dealings on behalf of the Company;
- Know and comply with this Code of Conduct, Company policies and procedures and the laws and regulations that apply to your work
- Demonstrate and support a culture that values integrity and ethical conduct; and
- Report any suspected violations of the law, this Code of Conduct or Company Policies.

If you are in doubt about any of the content of this Code of Conduct and how it applies to you and your work, please discuss your questions with your manager or the General Counsel.

If there is a conflict between this Code of Conduct and local laws, you should comply with the more stringent requirement. Any deviation from this Code of Conduct must be approved by the Chief Executive Officer or General Counsel.

## Asking Questions and Reporting Issues

There are several ways to raise a concern:

- Talk to your manager
- Talk to the General Counsel/Head of Compliance

If you feel uncomfortable raising your concern with any of the above, we offer a secure and confidential whistleblowing channel, ensuring that any concerns about misconduct can be reported and dealt with appropriately.



To report a concern, follow the below link:

<https://app.andfrankly.com/whistleblower/dashboard/wrrMsAWmuGtUIBQu>

Any concern received will be taken seriously and will be followed up. Any follow-up will be dealt with confidentially, in a timely manner and fairly to all parties involved. There will be no presumption of guilt. Any form of retaliation against a person reporting a matter in good faith will not be tolerated.

Violations of this Code of Conduct, Company Policies and Procedures or relevant law may result in disciplinary action that may include dismissal or termination of a person’s contract.

# SUPPORTING OUR PEOPLE

## Equal Employment Opportunity and Discrimination / Harassment-Free Work Environment

We foster a culture of openness and inclusion, recognizing that diversity of thought and collaboration drive innovation. We do not tolerate any form of harassment or discrimination whether it is in relation to gender, race, color, religion, ethnicity, national origin, ancestry, age, physical or mental disability, pregnancy, veteran status, marital status, sexual orientation, gender identity, genetic information or any other basis protected by law.

## Human Rights and Labor Rights

We support and respect the protection of internationally adopted human and labor rights, including the Universal Declaration of Human Rights and fundamental workers' rights adopted by the International Labour Organization, including not to engage in or in any way support the use of child labor or any other form of modern slavery.

## Health and Safety

Nothing is more important than the health, safety and well-being of our employees and contractors. We seek to create a healthy and safe culture in our workplace. We all take personal responsibility for understanding, following and continuously improving all aspects of occupational health and safety procedures with the ambition to prevent and reduce work-related physical and psychological stress to prevent and manage all types of health and safety issues in our business. We report any accidents, incidents, or unsafe practices to enable an appropriate response or corrective action.



# DOING BUSINESS ETHICALLY

## Research and Development

We are here to develop products which enhance and extend the lives of the patients we treat. All research and development that we are involved in shall be scientifically justified, conducted in accordance with high ethical standards and in compliance with applicable laws, regulations, industry codes and international requirements. We are committed to safeguarding the health and safety of study participants, and to protecting them from unnecessary risk.

We ensure that the data from our clinical studies are handled appropriately, and reported accurately, in a manner that avoids bias or conflict of interest. We register our clinical studies in applicable databases and report our study results regardless of outcome.

## Product Quality and Safety

Ensuring the quality of our products is vital. We operate and maintain a well-designed and properly implemented quality management system with proper oversight of suppliers, collaborators, and distributors to meet our quality objectives.

We collect, evaluate, and report product complaints and adverse events related to our products consistent with regulatory requirements. We investigate these reports and take corrective action as needed.

## Engaging with Patients, Caregivers, and Advocacy Organizations

We foster collaborative, transparent, and respectful relationships with patient advocacy organizations and

individual patients and caregivers in the disease states in which we work. We respect the patient/physician relationship in all our activities. We also respect the independence of patient advocacy organizations and ensure that any funding provided to support their work is not intended to influence or garner the recommendation of an Egetis product. Our interactions with patients and caregivers are aimed at encouraging them to be strong advocates for their care. We never provide medical advice or recommendations regarding therapy. We only engage in compliant and legitimate sales and marketing activities and interactions with patients, caregivers, patient organizations, public authorities, and other stakeholders.

## Compliant Promotion

All marketing and advertising involving our products must be accurate, verifiable, balanced, and unambiguous. We promote our products only for the uses for which they have been approved and do not engage in any sales and marketing practices that may be considered deceptive, fraudulent, dishonest, misleading, or unfair.

## Engaging with Healthcare Professionals and Organizations

Egetis is committed to complying with all applicable laws, and regulations in interacting with healthcare professionals. We do not attempt to inappropriately influence the judgment of healthcare professionals related to their prescription or recommendation of Egetis products. We will not provide, offer, or promise any money, goods, hospitality, gift, or any other item of value to induce or reward favorable treatment of our products.

We engage healthcare professionals as consultants only when we have a legitimate business need for their services. The consultants we hire are selected based on their qualifications and experience related to the business need. The nature of their services is documented in a written contract and any compensation provided is aligned with fair market value.

We disclose payments and other transfers of value to healthcare professionals and organizations consistent with laws and regulations. We have systems to track our transfers of value to enable timely, accurate, and complete disclosures.

## Anti-Corruption and Bribery

We comply with all relevant anti-corruption laws in the countries we operate. We also recognize the increased risks of corruption when dealing with government officials, regulatory authorities, public healthcare systems and those working on their behalf. As a result, we do not engage in bribery or corruption in any form. We do not offer, pay or accept bribes, no matter where we operate, no matter what the situation and no matter who is involved. This includes our agents, distributors, intermediaries or other third parties working on our behalf. It also includes a prohibition on the payment of facilitation payments (sometimes known as 'grease' payments).

As part of our assessment of potential business collaborations, we conduct relevant due diligence procedures to evaluate their level of alignment with our principles and the standards set out in this Code of Conduct.



# DOING BUSINESS ETHICALLY

## Political Contributions

All marketing and advertising involving our products must be accurate, verifiable, balanced, and unambiguous. We promote our products only for the uses for which they have been approved and do not engage in any sales and marketing practices that may be considered deceptive, fraudulent, dishonest, misleading, or unfair.

## Conflict of Interest

A conflict of interest occurs when our own private interests interfere or appear to interfere with the interests of Egetis. A conflict of interest could compromise – or even appear to compromise – our objectivity or ability to make impartial business decisions. This could be a second role or appointment outside of the Company; working for a potential competitor (whether as a consultant, adviser or volunteering); having a financial interest or relative in a potential supplier or customer. We should avoid situations that present a potential or actual conflict between their own interests and the Company's. If in doubt we should ensure we declare any potential conflicts to our manager or the General Counsel. Most conflicts can easily be avoided or addressed if they are promptly disclosed and effectively managed.

## Fair Dealing and Competition

We deal fairly and lawfully in all our business dealings on the Company's behalf. We do not take unfair advantage of another person in business dealings on the Company's behalf through the abuse of privileged or confidential information or through improper manipulation, concealment, or misrepresentation of material facts.

We deal fairly and honestly with suppliers. This means that our relationships with suppliers are based on price, quality, service, and reputation. No employee may accept or solicit any personal benefit from a supplier or potential supplier that might compromise, or appear to compromise, their objective assessment of the supplier's products and prices.

We are committed to free and open competition in the marketplace and comply with the antitrust, unfair competition and trade regulation laws. In engaging with competitors, we are careful to avoid discussions on topics that can be viewed as anti-competitive, such as pricing, production costs and output.

## Sustainability

The impact we have on our environment and communities we operate in is important. We aim to integrate environmental considerations into daily work routines and decisions and seek opportunities to minimize our environmental impact. When choosing suppliers, we consider criteria around environmental impact, e.g. climate-friendly energy sources and energy-efficient solutions.

## Sanctions and Trade Controls

We are committed to trading responsibly. This means complying with all relevant sanction laws, and laws and regulations that cover our imports and exports of goods, software, technology, data, and services across national borders, including laws covering international boycotts. To meet these objectives, we must understand and transparently report what we are importing or exporting, where and to whom it is going, and how it will be used.



# MANAGING BUSINESS RECORDS AND CORPORATE COMMUNICATIONS

## Protection of Personal Data

As part of our business, we may collect personal data that is highly confidential and sensitive whether it relates to our employees, suppliers, patients, Healthcare Professionals or other stakeholders. We need people to trust us with their personal data and to do that:

- We should only ask for the data that we need (making every effort to anonymize nor pseudo anonymize where possible);
- We are open about why we need the personal data and what we are going to do with it;
- We will only use or process it where we have a lawful reason for doing so;
- We will keep it securely and only hold it for as long as we need to;
- We will only transfer it to other parties with good reason and can retain it with the same level of protection.

We will comply with all relevant data privacy laws relevant to the collection, use and transfer.

## Confidentiality

Safeguarding our confidential information is crucial to protecting our company's interests and our future success. "Confidential information" includes all non-public information that supports our Intellectual Property or could materially impact Egetis.

We may not disclose or distribute the Company's confidential information, except when disclosure is authorized by Egetis or required by applicable law, rule, or regulation or pursuant to an applicable legal proceeding.

We may only use Egetis' confidential information, for legitimate company purposes and keep it securely at all times. Upon termination of a business relationship with Egetis, we must ensure individuals and companies must return or destroy all Egetis confidential and/or proprietary information.

## Intellectual Property

By protecting our intellectual property, we will maintain our competitive advantage and also foster innovation. We protect our intellectual property, including copyrights, patents, trademarks, logos, inventions, and trade secrets and monitor for unauthorized use by others. We also respect the intellectual property of others including our suppliers, customers and competitors. We take appropriate measures to prevent the intentional or inadvertent disclosure of patentable inventions before they can be appropriately protected. We keep accurate records when conducting research and developing original work.

## Financial Reporting and Inside Information

As a publicly traded company, we shall ensure that any financial and non-financial information is accurate, up to date and not misleading. For Egetis employees, specific procedures apply regarding buying or selling financial instruments in Egetis, but anyone involved in working with Egetis and anyone closely associated with such person may also receive or have access to information that could be considered "inside information" or "material nonpublic information" under applicable law. We shall all ensure that such non-public information is not allowed to illegitimately influence a decision to buy or sell financial instruments related to Egetis. Please refer to Egetis' Insider Policy for more information.

## Recordkeeping

We take care to report all business transactions honestly and accurately and have implemented appropriate financial policies to that effect aligned with applicable laws and regulations. Individuals are responsible for the accuracy of their records and reports and for complying with said policies. Accurate information is essential to not only meet our legal and regulatory obligations but to effectively run our business.

- Egetis books, records and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record.
- Our financial statements shall conform to generally accepted accounting rules and our accounting policies.
- No undisclosed or unrecorded account or fund shall be established for any purpose.
- No false or misleading entries shall be made in Egetis' books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation.
- We comply with the applicable transparency requirements and disclose transfer of values in accordance with our Recording of Transfers of Value Policy.

We will adhere to all relevant policies on retention of company records and will not destroy or remove records unless authorized to do so.

## Transparent communication

We are committed to open and honest in our communication and sharing information with all our stakeholders. To ensure accurate information is provided only authorized spokespeople may speak as a representative of Egetis to the media.



## MANAGING BUSINESS RECORDS AND CORPORATE COMMUNICATIONS

Similarly, only authorized spokespeople may create online social media posts, or Egetis social media accounts involving or mentioning Egetis products, or reporting new public disclosures, including press releases, financial statements, and forecasts.

When communicating on social media in a private capacity, we ensure that our posts are made in a careful and responsible manner. Any resharing of Egetis social media content must be done consistent with the Company's Social Media Policy.

### IT and Cyber Security

In today's digital age, the importance of robust IT security cannot be overstated. Adhering to our IT security guidelines is crucial for protecting sensitive data, maintaining regulatory compliance, and preventing cyber threats, such as malware, ransomware, and phishing attacks. We are each responsible for following our IT Security guidelines and standard operating procedures and cultivating a culture of security awareness.

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