

## **F2G Limited**

### **CODE OF BUSINESS CONDUCT AND ETHICS**

This Code of Business Conduct and Ethics (the “Code”) applies to all directors, officers, employees and third-party partners (e.g., vendors, contractors and other suppliers) conducting business on behalf of F2G Ltd (or “F2G”); these individuals are collectively referred to as “F2G Associates” within this Code. Except as otherwise required by applicable local law, this Code applies to F2G and all of its subsidiaries and other business entities controlled by F2G worldwide.

This Code offers guiding principles and reasonable standards intended to promote honest and ethical conduct in accordance with high standards of integrity in the performance of F2G’s business, and in compliance with all applicable laws and regulations. If you have any questions regarding this Code, F2G’s policies or their application to you in any situation, you should contact your supervisor, Human Resources or the Legal Department.

#### **Honest and Ethical Conduct and Fair Dealing**

F2G is committed to creating a company culture in which we demonstrate honest, ethical conduct and integrity in all our actions. F2G Associates are expected to deal honestly, ethically and fairly, and to comply with applicable laws, regulations, codes and industry guidance.

#### **Reporting / Speaking Up**

F2G’s reputation as a company that operates with high ethical standards depends upon the conduct of our employees and partners. We each have a responsibility to do the right thing in all interactions as we go about our daily responsibilities. As an F2G Associate, you are expected to ask questions and seek guidance when the right course of action is unclear.

You also have an ethical obligation to report suspected violations and express concerns regarding compliance with applicable laws or this Code to your supervisor, Human Resources, Legal or the Compliance Hotline, as described below. You may report such conduct openly or anonymously without fear of retaliation. F2G will not discipline, discriminate against or retaliate against any employee who, in good faith, reports a complaint or concern, or who cooperates in any investigation or inquiry regarding such conduct. Reporting in “good faith” means the reporter reasonably believes the information relayed is accurate and shows potential and/or actual misconduct, non-compliance, or a violation of the Code, policies, or applicable laws or regulations. Any supervisor who receives a report of a violation of this Code must immediately inform the Human Resources Department or Legal.

All reported concerns are treated seriously and reviewed promptly, fairly and thoroughly. F2G evaluates all information provided to determine the appropriate next steps, which may include a formal investigation into alleged violations or misconduct. F2G expects that all

Associates will truthfully and completely cooperate with all investigations. If misconduct is confirmed, or if an employee does not candidly and completely participate in any investigation, F2G will determine the appropriate corrective or disciplinary action, up to and including termination of employment.

F2G understands that maintaining confidentiality is critical to ensuring that Associates feel comfortable coming forward with concerns, questions, or requests for guidance. We make every effort to maintain the confidentiality of questions or reports while honouring our legal and ethical commitments. This may include protecting the identities of individuals who are part of an investigation. However, there may be a point where the identity of these individuals may become known or may have to be revealed. In order to ensure confidentiality, we expect that individuals who are interviewed in connection with investigations should not discuss the investigation, including any questions or answers, and should not discuss questions or answers with other potential witnesses.

You may report your concerns on an anonymous basis via the following channels (the “Compliance Hotline”):

- Online: [f2g.ethicspoint.com](https://f2g.ethicspoint.com)
- Mobile Device: [f2g-mobile.ethicspoint.com](https://f2g-mobile.ethicspoint.com)
- Toll-free:
  - Austria: 0-800-200-288, then dial 844-539-2260
  - United Kingdom: 0-800-89-0011, then dial 844-539-2260
  - USA: 844-539-2260

Failure to comply with the standards outlined in this Code will result in disciplinary action up to and including termination of employment. Certain violations of this Code may require F2G to refer the matter to the appropriate governmental or regulatory authorities for investigation or prosecution. Any supervisor who directs or approves of any conduct in violation of this Code, or who has knowledge of such conduct and does not immediately report it, will be subject to disciplinary action, up to and including termination.

### **Compliance with Laws, Rules and Regulations**

F2G requires that F2G Associates comply with all laws, rules and regulations applicable to F2G wherever it does business. While we do not expect you to know the details of every applicable law or regulation, we do expect you to use good judgment and to ask for advice when the right course of action is not clear.

If you become aware of a violation of any law, rule or regulation by F2G, whether by its associates or any third-party doing business on behalf of F2G, it is your responsibility to promptly report the matter to your supervisor, Human Resources or the Legal Department.

While F2G is committed to addressing matters internally, nothing in this Code prohibits you from:

- Reporting any illegal activity, including any violation of applicable securities laws, antitrust laws, environmental laws or any other local or foreign law, rule or regulation, to the appropriate regulatory authority; or
- Engaging in activity protected by the rules and regulations of local or foreign labour boards or from testifying, participating or otherwise assisting in any local or foreign administrative, judicial or legislative proceeding or investigation.

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

F2G is committed to conducting business fairly, honestly and with integrity. In accordance with this commitment, F2G Associates are expected to comply with all applicable anti-bribery and anti-corruption laws in the countries in which F2G operates and are prohibited from any behaviour that improperly limits or exerts influence over business competition. F2G Associates must not offer, provide, solicit, or receive any bribe, kickback or other payment that could cause improper influence or an unfair advantage.

Bribes and kickbacks are criminal acts, strictly prohibited by F2G in accordance with applicable laws such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. You must not offer, give, solicit or receive any form of bribe or kickback anywhere in the world. This includes giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business.

You are expected to have a basic understanding of the anti-bribery and anti-corruption laws of the countries in which we operate and to be mindful of these requirements when dealing with hospitals, clinics, healthcare organizations (HCOs), healthcare professionals (HCPs), government agencies or officials and others.

### **Antitrust/Fair Competition**

F2G competes fairly and strategically for business opportunities, and we expect our Associates to comply with antitrust and fair competition laws around the world to ensure free and open competition in the marketplace. F2G Associates must use good judgment in all business interactions and avoid taking any action that could have an improper anti-competitive effect, which may include (but not be limited to):

- Making agreements or understandings with competitors regarding pricing;
- Exchanging pricing or other proprietary information with competitors;
- Making false or deceptive comparisons between F2G and its competitors in interactions with customers; and
- Acquiring through improper means, sharing or otherwise misusing F2G trade secrets, intellectual property or other proprietary or confidential information.

### **Equal Employment Opportunity**

F2G is committed to the principles of equal employment opportunity for all F2G Associates. Applicants and employees are evaluated on the basis of job qualifications,

without regard to race, colour, religion, sex, age, national origin, marital status, disability, veteran status or any other characteristic protected by applicable laws.

F2G provides equal employment opportunities in all employment practices, including, but not limited to, promotion, demotion, transfer, recruitment, termination, rates of pay or other forms of compensation and selection for training. Every F2G employee has access to company-sponsored educational, training and recreational activities.

If you have questions about F2G's policy on equal employment opportunity, reach out to the Human Resources Department.

### **Anti-Discrimination and Anti-Harassment**

F2G is dedicated to maintaining a workplace where all individuals are treated with respect. We are committed to providing all F2G Associates with a working environment free from harassment and discrimination. F2G Associates are responsible for ensuring that every individual is welcomed, accepted and rewarded according to their qualifications and contribution to the achievement of F2G's goals and objectives.

F2G prohibits any behaviour that creates an intimidating, hostile, uncomfortable or offensive work environment, which includes:

- Harassment or other kinds of unwelcome conduct directed at an individual based on their race, colour, religion, sex, age, national origin, marital status, disability, veteran status or any other characteristic protected by applicable laws; and
- Discrimination or differential treatment of an individual on the basis of these characteristics.

This prohibition applies both in the workplace and off-premises, including at social activities conducted or sponsored by F2G.

If you believe you have been subjected to conduct in violation of F2G's anti-discrimination and anti-harassment policies, you should report such conduct to your supervisor, Human Resources or the Legal Department.

### **Interactions with Healthcare Professionals and Healthcare Organizations**

F2G's interactions with HCPs and HCOs are intended to benefit patient care and enhance the practice of medicine, and may include education and training, speaker programs and product development and research, among others. All interactions between F2G Associates and HCPs and/or HCOs must be truthful, accurate, balanced and not misleading.

F2G Associates must have a legitimate business, scientific or medical need when interacting with HCPs. Your interactions with an HCP must never be intended to improperly influence the HCP's

independent decision-making. Any items of value offered to HCPs must be modest and permissible under all applicable laws, regulations and F2G policies.

## **Interactions with Patients, Caregivers and Patient Organizations**

Interactions with patients, caregivers and patient organizations are intended to improve access to care, filling patients' unmet needs, providing patient education and supporting survivorship and well-being. Interactions with patients, caregivers and patient organizations are guided by the principle of providing truthful, accurate and objective information about disease states. F2G Associates must respect the relationship between patients and caregivers and their respective healthcare teams and are expected to conduct all interactions with patients, caregivers and patient organizations with respect for the independence of the relationship between patients and their healthcare providers.

F2G Associates must ensure that all interactions with patients, caregivers and patient organizations are educational, accurate and consistent with applicable F2G policies and with legal and regulatory standards to protect the privacy of patients' personal and health information. See additional requirements in the section titled Data Privacy.

## **Conflicts of Interest**

F2G understands that our employees and partners have a right to manage personal affairs and investments outside of their engagement with F2G. However, F2G Associates are expected to refrain from engaging in any activity that presents an actual or perceived conflict of interest, which may occur when your personal interests interfere with the business interests of F2G.

Areas that may present a conflict of interest include:

*Personal Relationships:* Potential conflicts may arise if you hire, manage or conduct business with personal friends or relatives.

*Financial Interests:* Having a financial interest in, or exercising control over, a F2G supplier, customer or competitor may present a conflict. A "financial interest" means ownership or investment in an organization by you and/or a family member.

*Personal Benefits:* A conflict may arise if you aim to use your position to gain a personal benefit or some form of compensation for yourself, your family, or your friends.

*Outside Employment:* Working outside of F2G may present a potential conflict if the outside employment competes or interferes with your role or responsibilities at F2G.

*Outside Activities:* Activities such as board directorships or advisory roles for other organizations such as private or public companies, universities or other organizations may

pose a conflict if they interfere with your role, responsibilities or time commitments to F2G.

F2G Associates are expected to disclose any transaction or relationship that may present a conflict of interest. Potential conflicts must be disclosed to the Human Resources or Legal Department or, if you are an executive officer or director, to the Board of Directors, for appropriate review.

## **Gifts and Entertainment**

F2G recognizes that gifts and business entertainment are courtesies that may occasionally be used to support good working relationships with customers, vendors and suppliers. However, gifts or entertainment that create an actual or perceived conflict of interest, or that are provided with the intention of influencing a business decision, are prohibited.

Gifts and entertainment of nominal value may be provided only on an occasional basis to recipients with whom F2G has a legitimate business relationship and must be provided in compliance with the recipient's own rules for acceptance of such items.

Providing gifts or entertainment to HCPs or government officials is prohibited. Gifts or entertainment provided from F2G or individual managers to F2G Associates must be awarded consistently to all Associates using the same criteria, and without bias or favoritism.

Examples of permitted gifts may include:

- Gifts to F2G Associates in recognition of:
  - Bereavement for the loss of a family member;
  - Birth/Adoption of a child; and
  - Significant life events, such as the wedding, retirement or serious hospitalization of F2G Associates
- Unsolicited, occasional gift of nominal value received from a vendor

Examples of prohibited gifts include:

- Providing:
  - Gifts or entertainment to HCPs (e.g., birthdays, promotions, new positions, retirement, bereavement);
  - Cash or cash equivalents;
  - Gifts specifically requested by the receiver;
  - Free health care items or services unless specifically allowed by policy; and
  - Trips outside of the F2G travel policy.
- Receiving:
  - Gifts from patients, customers or HCPs in any form; and
  - Gifts from vendors pending purchasing decision.

## **Accuracy of Books and Records**

As part of our commitment to transparency and ethical, honest business conduct, we expect that F2G Associates honestly and accurately reports all business transactions and activities. Accurate information is essential to F2G's ability to meet legal and regulatory obligations.

F2G Associates must adhere to the following principles when creating records on behalf of F2G:

- F2G books, records and accounts must be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record.
- F2G books, records and accounts must not contain false or misleading entries for any reason.
- F2G financials must conform to generally accepted accounting rules.
- Disbursement of corporate funds or other corporate property must be made with adequate supporting documentation.

### **Dealings with Independent Auditors**

In certain circumstances, F2G may be subject to audit by an external, independent third party. Where appropriate and necessary, F2G executive leadership may engage F2G Associates to assist with responding to an audit. In such cases, F2G Associates are expected to:

- Cooperate with F2G leadership and independent auditors to provide relevant materials as appropriate for your role;
- Provide truthful, accurate and non-misleading statements and complete and accurate records in connection with any audit, review, or examination of F2G's financial statements; or
- Avoid directly or indirectly taking any action to coerce, manipulate, mislead or fraudulently influence an independent public or certified public accountant engaged in the performance of an audit or review of F2G's financial statements.

F2G Associates must refer questions or concerns related to audit activities to the CFO or Audit Committee.

## **Protection and Proper Use of F2G Assets**

F2G assets, including computers, email and telephones, are provided to F2G Associates to assist in conducting F2G's business. F2G Associates are expected to protect F2G's assets by exercising good judgment in the use of and care for these assets. F2G Associates must use F2G's assets and services solely for legitimate business purposes of F2G and not for any personal benefit or the personal benefit of anyone else.

Where permitted by law, F2G reserves the right to access, monitor, review and disclose information related to activities conducted using company property as we deem appropriate. F2G Associates should have no expectation of privacy when using F2G property.

## **Confidential and Proprietary Information**

During the normal course of business, F2G Associates may encounter confidential or proprietary information that is crucial to the strategic success of F2G.

Examples of such information include:

- Research related information, such as discoveries, inventions, products, product improvements or enhancements, processes, methods, techniques, formulas, compositions or compounds;
- Negotiation strategies and positions;
- Business and marketing plans;
- Research or clinical data;
- Financial data (including sales costs, profits and pricing methods);
- Computer programs (including software used pursuant to a license agreement); and
- Customer, prospect and supplier lists and contacts at or knowledge of customers or prospective customers of F2G.

F2G Associates must maintain the confidentiality of Proprietary Information entrusted to them by F2G or other companies, including our suppliers and customers, except when disclosure is authorized by a supervisor or legally permitted in connection with reporting illegal activity to the appropriate regulatory authority. Unauthorized disclosure of any Proprietary Information is prohibited. Additionally, Associates should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to F2G or another company, is not communicated within F2G except to employees and third-party partners who have a legitimate need to know such information to perform their responsibilities for F2G.

## **Data Privacy**

F2G is committed to protecting the confidentiality of personally identifiable information in accordance with global, national, and local regulations such as the General Data Protection Regulation (GDPR), the Health Insurance Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health (HITECH) and the California Consumer Protection Act (CCPA). We comply with all legal requirements and policies that apply to the collection, use and retention of personally identifiable information. This includes, but is not limited to, personal information of employees, job applicants, customers, stakeholders and other interested parties.

In the course of developing new therapies and conducting regular business interactions (e.g., via clinical trials, patient advocacy, insights gathering, etc.), F2G Associates may encounter or obtain personal and/or sensitive information (e.g., name, age, gender, date of birth, contact information, etc.) about colleagues, customers, patients, caregivers and business partners. F2G Associates must protect and maintain the privacy of all individuals whose information he or she encounters or handle and comply with all applicable privacy and data protection laws, which may be broad and apply to a number of sources, regarding the collection and use of such information.



F2G Associates are expected to be mindful of privacy and the restrictions placed on the use and disclosure of personal information. You must promptly report any potential loss or misuse of personal information to your supervisor, Human Resources or the Legal Department.

## **Ethical Research**

At F2G, we are passionate about developing effective therapies to improve patients' lives. We conduct clinical research in a way that protects patient safety and rights and upholds the highest ethical research standards.

When conducting research, F2G Associates are expected to comply with all applicable laws and regulations and international ethical guidelines such as Good Laboratory Practices (GLP) and Good Clinical Practices (GCP).

F2G Associates must ensure that:

- Protocols are properly reviewed and approved, and patients are informed about the purpose of our research;
- Study participants are not exposed to unnecessary risks;
- Study participants understand the nature and purpose of research and provide their informed consent;
- Study procedures follow privacy and confidentiality rules; and
- All study data follow transparent and accurate reporting, interpretation and verification.

## **Waivers of this Code of Business Conduct**

While some of the policies contained in this Code must be strictly adhered to and no exceptions can be allowed, in other cases exceptions may be appropriate. Any employee or officer who believes that a waiver of any of these policies is appropriate in his or her case should first contact his or her immediate supervisor. If the supervisor agrees that a waiver is appropriate the approval of the Legal Department must be obtained. The Legal Department shall be responsible for maintaining a record of all requests by employees or officers for waivers of any of these policies and the disposition of such requests.

Any executive officer or director who seeks a waiver of any of these policies should contact the Legal Department. Any waiver of this Code for executive officers or directors or any change to this Code that applies to executive officers or directors may be made only by the Board of Directors of F2G.