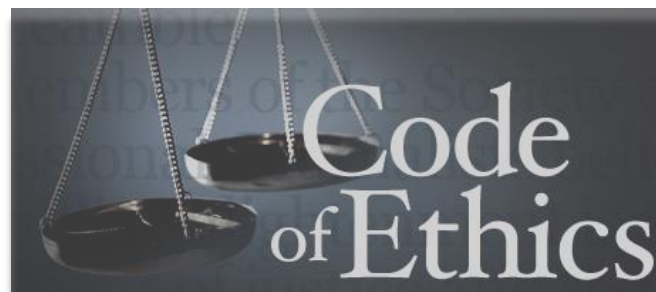


Code of Ethics and Conduct

PEPTOMYC, S.L.



(Second draft August 03, 2020)



1.1 Objective.

This **Code of Ethics and Conduct** is a guide for orientation of our team and collaborators to meet the highest standards of ethical behavior and professional integrity, which are the reflection of our philosophy, expressed especially by the following values of PEPTOMYC, S.L. (hereinafter PEPTOMYC):



According to these values, we strive for constant innovation in our projects, delivering high quality and efficient novel solutions, we commit to sustained top-level performance, and we continuously optimize processes to reduce long-term costs without compromising quality, ethics and integrity.

1.2 Scope of Application.

The responsible business practices defined in this Code apply to all countries in which we operate.

They also apply to all employees (as well as contractors and temporary staff), directors, executives and others dependent on PEPTOMYC.

PEPTOMYC's **Ethics Program** helps us foster a culture of compliance and ethics throughout the Company. This objective is achieved by developing and implementing

global programs that assess standard risks and policies, monitoring, auditing and investigating in every moment compliance with defined standards.

1.3 General responsibilities.

Integrity is a core value of PEPTOMYC.

We are all responsible for carrying out a good conduct of business ethics.

Our responsibilities include the following:

- Read and follow this Code.
- Read and comply with corporate policies, and with PEPTOMYC's functional policies and procedures that apply to our respective tasks.
- Act in a professional and respectful manner with peers, colleagues and collaborators.
- Do not participate in any illegal or unethical activity.
- Request assistance when needed from resources indicated in this Code.

If you have knowledge or suspicion of any misconduct or violation of our policies or procedures, by yourself, by your colleagues and / or by PEPTOMYC, you must raise such concerns. You can report violations or suspected violations emailing to: compliance@peptomyc.com

Protection against retaliation:

This PEPTOMYC policy prohibits retaliation and protects people who might raise concerns or seek advice. This means that a problem can be raised or reported in good faith by anyone, or be subject to an investigation without any negative impact on the person making the report.



1.4 Respect.

PEPTOMYC demands a treatment of respect, equality and justice in relationships with all people, valuing diversity and defending the philosophy of inclusion, independent of social condition, gender, sexuality, personal beliefs, nationality, ethnic origin or religion.

Harassment, abusive, hostile or offensive conduct, including any degree of bullying, are unacceptable in any form, either verbal or physical.

PEPTOMYC guarantees safety and hygiene at work, adopting as many measures as necessary to maximize the prevention of labor risks.

PEPTOMYC fosters professional development, training and promotion of employees.

1.5 Confidentiality.

PEPTOMYC guarantees the confidentiality of the information it has in its possession, and refrains from looking for reserved data, except in the case of express authorization and compliance with legal regulations in force.

PEPTOMYC collaborators will not use reserved information for purposes outside the scope of their agreed activity, refraining from abuse of confidential information or market manipulation.

For PEPTOMYC, confidential information is a valuable business asset. It is for this reason that we have an obligation to protect the confidential information we receive or we develop during the course of our work, as well as other sensitive information we receive from customers, suppliers, partners and third parties, which

could be used by the competition to be harmful to PEPTOMYC or its clients if disclosed.

1.6 Conflicts of interest.

In carrying out any activity, one should avoid situations where the subjects involved in the transactions are, or appear to be, in a conflict of interest.

This refers as much to a collaborator who might have a different interest compared to PEPTOMYC's mission, as to any employee that might benefit "personally" from the company's business opportunities, acting against transferred trustful obligations linked to his/her position, in his/her relations with PEPTOMYC.

1.7 Shareholders, Directors and Administrators.

A shareholder, even potential, is not only a source of funding but also a subject with opinions and moral preferences of various kinds. Therefore, to get a good orientation related to decision making regarding investments and social deliberations, he/she needs access to all relevant information. PEPTOMYC commits to create the necessary conditions for the shareholders' participation in decisions within their competence, guaranteeing equality of information.

Likewise, this code of conduct protects the interests of PEPTOMYC and all the shareholders against initiatives not marked by the principles of transparency and information correction.

In relation to the functions of Directors and Administrators, they must carry out their activity in a professional, ethical and responsible way:



- reporting promptly and with accuracy to shareholders on the status and prospects of the Business,
- complying with and enforcing the rules and principles of generally accepted accounting,
- setting up systems for internal and external control and risk management appropriate to the characteristics of the company,
- keeping books and records of the company with accuracy and honesty, to allow for access to information and conscious and responsible decision-making.

1.8 Suppliers and Clients.

PEPTOMYC commits to search and select only suppliers and customers whose business practices respect human dignity, who comply with the law and would not compromise the reputation of the company.

Contracts and work orders must be carried out in accordance with the consciously established terms by the parties. PEPTOMYC agrees not to take advantage of possible conditions of ignorance, missing know-how or incapacity of the other party.

1.9 Quality of Services and Products.

PEPTOMYC directs its own activity to satisfy and defend its customers, echoing requests that can favor the improvement of the quality of products and services.

For this reason, PEPTOMYC directs its activities of research, development and marketing to achieve high quality standards in its services and products,

whose business practices respect human dignity, do not infringe the law and do not jeopardize the reputation of the business.

In relation to competitors, PEPTOMYC commits not to abuse a dominant or privileged position and to compete loyally, cooperating to achieve a free market based on mutual respect among competitors, refraining from unfair practices and, in particular, not attracting clients from other competitors through unethical methods.

1.10 Sustainability and citizenship.

PEPTOMYC is committed to supporting sustainable business practices and acting like a good corporate citizen, carrying out commercial operations responsibly in order to assure the creation of long-term value.

PEPTOMYC demonstrates this commitment by adopting policies and practices in specific areas related to sustainable development, including environment, health and security, supporting workers' rights and maintaining ethical business practices.

The PEPTOMYC Sustainability and Citizenship Program focuses on three main areas:

- **Planet:** Generate a positive impact on the environment in which we work.
- **Staff:** Create a workplace with highly trained, committed, confident employees with a feeling of team spirit.
- **Public:** Interact in a coherent and transparent way to encourage participation and demonstrate leadership in sustainability.



There are many ways in which we can support this Commitment, including the following: reduce solid waste, use recycling bins, print both sides of a page, reduce energy consumption by sharing the vehicle or turning off the computers and lights every day.

1.11 Presents, gifts and favors.

No type of gift is accepted that can be interpreted in any way as something that exceeds normal business or courtesy

practices, or destined to receive a favorable treatment of any activity that could be linked to PEPTOMYC.

In particular, any form of gift is prohibited to public officials, auditors, directors of PEPTOMYC, or their relatives, that may influence the independence of judgment or imply any kind of favor.

This prohibition even applies in countries where bribes are common and where local laws or cultural habits may allow them.

