



# CODE OF CONDUCT

BioArctic AB ("BioArctic") is a research-intensive biotech company that, in its research and drug development, largely engages external partners in research, development and manufacturing. For example, preclinical studies in animals and clinical trials of medicinal products in humans are performed. BioArctic develops innovative medicines for diseases with high medical needs.

Sustainable development is a prerequisite for the activities we conduct at BioArctic. The company wants to bring added value to BioArctic's stakeholders without compromising issues in the environment, work environment and social responsibility. An ethical, social and environmental responsibility is an integral part of BioArctic's long-term business strategy. The Code of Conduct specifies how the company takes responsibility for taking into account human rights for those affected by the company's business, as well as contributing to sustainable development.

BioArctic's Code of Conduct is developed in accordance with the principles of the UN Global Compact and the ILO Declaration of Fundamental Principles and Rights at Work. The Code of Conduct together with other policy documents and rules for corporate governance form the basis for the company's business and responsibility. The Code of Conduct applies throughout the business and in relation to suppliers of products and services. It covers all employees, consultants and board members.

## **Application of Code of Conduct**

Responsible for the Code of Conduct and follow-up of this is the CEO. It is also the duty of every employee to act according to the code in his or her daily working life. BioArctic's other policies provide more detailed information within each specific area.

The Code of Conduct is a mandatory document when introducing new employees.

## **Code of Conduct for Suppliers**

The Code of Conduct is a strategically important document in relation to the company's suppliers. In order to clarify the requirements covered by the suppliers, a supplier version of the Code of Conduct shall be provided. It shall constitute a mandatory part of the contractual terms between BioArctic and the supplier. Suppliers who have subcontractors to deliver to BioArctic shall be responsible for compliance with and conducting the Code of Conduct. BioArctic has an audit program to verify that company vendors meet relevant regulatory requirements. Suppliers shall be responsible for documenting changes and deviations from the Code of Conduct.

If the supplier deviates from the terms of the Code of Conduct, BioArctic will require the supplier to draw up an action plan to correct the defects. If the action plan is not implemented within the agreed

period of time, or if repeated discrepancies occur, BioArctic shall decide to terminate the business cooperation.

#### **If suspected violation of the BioArctic's Code of Conduct**

Each employee is entitled to report suspicion of violation of the code of conduct without post-clearance action. In case of suspicion of violation, information is sent to the Board, CEO or person responsible for HR.

#### **Human Rights**

In BioArctic's business, all people are entitled to be evaluated based on their own personality and actions, not based on origin, group affiliation, gender or sexual orientation.

In BioArctic's business, the company shall support and respect internationally declared human rights. It is obvious and important for BioArctic to comply with laws and international rules and not to participate in human rights violations.

BioArctic wants to protect a business where all employees in a responsible manner and with a high ethical standard show respect and respect for colleagues, suppliers and customers.

BioArctic expects its suppliers to act in a similar manner to their employees. And, as the case may be, it is also expected that the company's suppliers will work for their subcontractors to act in a similar manner to their employees.

#### *Working conditions*

##### **Freedom of association**

BioArctic respects the employee's right to organize himself/herself in a union organization.

##### **Forced labor**

No form of forced labor or punishment is permitted. No employee shall be obliged to deposit valuables or identity papers with his/her employer. No form of locking is allowed.

##### **Child labor**

BioArctic accepts no form of child labor. Child labor refers to work performed by children under the age of 15 or the exceptions specified in Article 2.4 of the ILO Convention No 138, 1973.

##### **Discrimination and oppression**

BioArctic does not accept discrimination, threats or harassment in any form.

##### **Working hours**

Working hours must comply with international legislation and agreements or according to the standards of local industry. Overtime may not be required continuously.

##### **Wages**

Salaries, benefits and remuneration for overtime shall, as a minimum, comply with national legislation and agreements. Deduction from salary as a disciplinary measure is not permitted, provided that it is not governed by collective agreements or is approved by law.

Employees are entitled to a contract of employment.

**Health and Safety**

We shall offer a work environment that is safe. Workplace and equipment must comply with national laws and requirements that include safety and hygiene. Accidents and work-related injuries must be prevented. Risk assessments for laboratory work should be provided, read and signed before laboratory work is undertaken.

**Environment**

BioArctic will work continuously to streamline its resource utilization to minimize direct and indirect environmental impact in the short and long term.

When the company buys goods and services, it is strived to take into account technology that implies a reduced environmental impact in the short and long term.

When manufacturing products, the supplier must ensure safe handling of hazardous substances and waste.

Suppliers should be aware of and comply with requirements under national law, regulations and industry standards. The supplier's environmental work shall include knowledge and control of environmental impact and continuous improvement work in its operations.

**Business Ethics**

No form of extortion, corruption, bribery, including unfair offers for payment to or from employees or organizations, or money laundering is allowed. BioArctic disagrees with illegal competition restrictions.