

## MinervaX Supplier Code of Conduct

### 1. Introduction

This Supplier Code of Conduct aims to foster a better world. We value our relationship with you, our supplier, and are committed to conducting business with integrity, fairness, and respect. This Code outlines the standards we uphold and our expectations for you – not only in your operations but also concerning your suppliers – to ensure a responsible, ethical, and sustainable supply chain.

### 2. Compliance with Laws and Regulations

As a supplier to MinervaX, you must comply with all applicable laws, regulations, standards, and agreements. This includes, but is not limited to, laws related to human rights, anti-bribery, anti-corruption, employment, health and safety, and environmental protection.

### 3. Bribery, Corruption, and Fraud

As our supplier, we expect you to avoid any form of bribery, corruption, or fraud. This includes offering, giving, receiving, or soliciting anything of value which is meant to influence the actions of individuals in positions of trust, and engaging in money laundering. You must also comply with all applicable anti-bribery, anti-corruption, and anti-fraud laws.

### 4. Human Rights and Employment Practices

As our supplier, you are required to respect human rights, uphold fair employment practices, and treat individuals with dignity and respect. This encompasses:

- Complying with internationally recognized human rights.
- Ensure fair treatment and equal opportunities for employees while prohibiting discrimination or harassment based on race, color, religion, gender, sexual orientation, national origin, ethnicity, age, disability, or any other characteristic protected by law or deserving protection.

- Ensure that no employee is compelled into forced labor, that employees receive timely and full payment, and that they are free to leave their employer after providing standard notice.
- Ensure that employees meet the legal working age as defined by local laws and that young workers are safeguarded from any work that could interfere with their schooling or educational needs.
- Ensuring fair wages, benefits, and reasonable working hours that adhere to applicable laws, regulations, industry standards, and collective agreements.
- Respecting, to the extent provided for in local laws, the rights of your employees to associate, form, and join (or not join) labor unions, seek representation, join workers councils, and engage in collective bargaining.

## 5. Health and Safety

As a supplier to MinervaX, you must prioritize health and safety in all your operations. This includes:

- Complying with all applicable health and safety laws and regulations defined by local authorities.
- Implementing appropriate measures to prevent workplace accidents and injuries, such as work environment policies and procedures.
- Providing necessary training, protective measures, and controls, including protective equipment and measures against chemical, biological, and physical hazards, as well as emergency situations.
- Ensuring that participants' rights, health, and safety in clinical trials conducted on behalf of MinervaX are protected, including through informed consent and procedures to protect participant personal data.

## 6. Environmental Responsibility

In MinervaX, we are committed to protecting our planet and conducting our operations in an environmentally responsible manner. This includes:

- Complying with all applicable environmental laws and regulations.

- Supporting a precautionary approach to environmental challenges.
- Undertaking initiatives to promote greater environmental responsibility, including minimizing energy consumption, waste, and emissions.
- Promoting the development of eco-friendly technologies and utilizing resources efficiently and sustainably.

As our supplier, we expect you to reciprocate.

## 7. Ethical Business Practices

You must conduct your business in an ethically responsible manner and with integrity and transparency. This includes:

- Disclosing conflicts of interest:

As our supplier, you must promptly disclose any actual or potential conflict of interest that you become aware of and that may affect your performance of tasks or provision of services to MinervaX.

- Protecting confidential information:

MinervaX's confidential information is very valuable. You must always protect any confidential MinervaX information you handle and never disclose it to anyone who is not authorized to receive it.

- Protecting personal data:

MinervaX requires you to process personal data ethically and securely. You must also protect any personal data handled while working with MinervaX in accordance with applicable laws and regulations, such as GDPR and HIPAA, and take appropriate measures to safeguard it.

- Respecting intellectual property rights:

We take measures to respect the intellectual property rights of others, including patenting, trademarks, trade secrets, and know-how, and we expect you to do the same.

- Engaging in fair competition:

As our supplier, we expect you to follow fair business practices and competition and all relevant competition and antitrust laws. You must not

engage in uncompetitive practices such as price fixing, price sharing, market sharing, output limitation, or bid-rigging.

## 8. IT Security

Technological advancements have made information more accessible, yet it is also more vulnerable to unauthorized access and manipulation. Deficits in IT security protocols can lead to breaches of personal privacy and the unauthorized disclosure of sensitive corporate data.

As a supplier to MinervaX, you are expected to:

- Implement appropriate technical and organizational measures to secure all communication and data exchange with us.
- Promptly notify us of any incidents involving theft, loss, or unauthorized disclosure of information related to MinervaX.

## 9. Reporting Concerns

We encourage you to contact us with questions and report any concerns or violations regarding this Supplier Code of Conduct. You can get in touch with us at [info@minervax.com](mailto:info@minervax.com) or +45 39 17 82 82. All reports will be taken seriously and investigated promptly. We also encourage suppliers to establish reporting channels to ensure that concerns about potential legal violations, regulations, standards, and other issues can be reported safely and anonymously.

## 10. Compliance

As a supplier for MinervaX, we expect you to adhere to our Supplier Code of Conduct. We may request that you provide documentation to show your compliance with the Code, and we expect you to provide ESG-related information to MinervaX for our compliance reporting upon request.