

POLICY

Anticorruption policy

1. Introduction

Oncopeptides AB (publ) and its affiliates (“**Oncopeptides**” or the “**Company**”) is committed to conducting its business with the highest of ethical business standards. Oncopeptides’ reputation for integrity and fair dealing is of utmost importance. As such, Oncopeptides is committed to complying with all applicable anticorruption and antibribery laws such as the United States Foreign Corrupt Practices Act of 1977 (the “**FCPA**”), The EU and Swedish anti-corruption legislation and any other applicable laws when doing business with or in other countries or when travelling abroad, as well as anticorruption and antibribery laws concerning interactions with healthcare professionals (collectively referred to as the “**Anticorruption Laws**”).

2. Certain Definitions

The following terms are in this Anti-Corruption Policy (the “**Policy**”) defined as follows:

“**Bribery**” means offering, paying, providing, authorizing, requesting, accepting or receiving a financial or another advantage with the purpose to improperly influence a person (private gain) to misuse her/his position (power).

“**Corruption**” means any form of dishonesty or criminal offense undertaken by a person or organization entrusted with a position of authority, to acquire illicit benefit or abuse power for one's private gain, including but not limited to bribery, kick-backs, black, mailing, embezzlement, fraud, graft, extortion and money-laundering.

“**Government Official**” means any elected or appointed official, director, officer or employee of any government (whether at a national, state/provincial or local level) or any department, agency, or of any company in which a government owns a controlling interest.

3. Policy Statement: Corruption and Bribery are not tolerated

Oncopeptides do not accept any form of Corruption or Bribery and no one working for or with Oncopeptides may therefore, offer, pay, provide, authorize, request, accept or receive a bribe or receive or provide anything of value to any person, including persons in the private sector as well as Government Officials , in order to improperly influence such person.

It is the policy of Oncopeptides to fully comply with both the letter and spirit of applicable Anticorruption Laws and the Company wants to actively act to promote clean and ethical business. Corruption and bribery in any form contradicts Oncopeptides values and damages the trust and confidence shareholders, coworkers, customers, suppliers and other stakeholders have in the Company. In addition to harming the brand and reputation, breaches have significant and serious legal and financial consequences for the Company, as well as personally for any individual who engages in corrupt business practices.

4. GOVERNMENT OFFICIALS

Government Officials are invested with the trust of the general public. The activities are carried out in the citizens' interests and must be protected against any form of corruption. The integrity of the administration is key and there must be no doubt that decisions are made honestly and on impartial and objective grounds so that the citizens can trust the public sector. Therefore, special caution should be taken when Oncopeptides interacts with Government Officials and, as set forth below, stricter rules apply with respect to such relationship.

It is important to note that the Anticorruption Laws generally prohibit payments to *individual "Government Officials."* *Bona fide* payments to a government entity are not prohibited under such Anticorruption Laws unless Oncopeptides has some reason to know that the payment will actually end up in the hands of an individual official. For example, if an Oncopeptides foreign office is required to pay certain taxes or fees for business licenses to a foreign government entity, such payments to the foreign entities would not be prohibited under the Anticorruption Laws so long as the funds do not end up in the hands of any individual foreign official. However, if there are any doubt with respect thereto, the Legal Department shall be contacted for advice.

5. ANY THING OF VALUE

As stated above, this Policy prohibits offering, promising, or giving "*anything of value*" to a person to get or keep business or secure any advantage. Thus, improper provisions under this Policy are not limited to cash payments. On the contrary, gifts, entertainment, excessive business promotional activities, covering or reimbursing expenses, in-kind or political contributions, investment opportunities, subcontracts, stock options, and similar items provided to **any person** are all things of value that can violate the Anticorruption

Laws and this Policy. The same applies to requesting, accepting or receiving anything of value by Oncopeptides's representatives.

6. FACILITATION PAYMENTS

Facilitation payments are unofficial payments (normally small or insignificant put into relation to the gains of such payments) to Government Officials made to ensure or speeding up non-discretionary and routine governmental actions, such as processing visas or business permits. **It is against Oncopeptides' policy to make facilitation payments** (unless the health or safety of an employee is at risk).

A. PERMISSIBLE PAYMENTS

The five sections below provide limited exceptions to the general prohibition against providing anything of value to a Government Official or a private person for an improper purpose.

Gifts: While it is customary in many parts of the world to occasionally give gifts to customers and other business partners, **it is against Oncopeptides' policy to provide any gift to a Government Official.**

Business Expenses for Foreign Officials: This Policy permits Oncopeptides, to provide certain types of entertainment and travel to foreign officials provided that such entertainment and travel expenses are: (i) bona fide and related to a legitimate business purpose (*i.e.*, not provided to obtain or retain business, gain an improper advantage, or intended to influence the individual official in the performance of his/her duties); (ii) reasonable in amount; and (iii) legal under the written laws of Government Official's home country.

For **ALL** travel and travel-related expenses, the following considerations and requirements must be followed prior to approving such travel and travel-related expenses:¹

- i. the travel is for a legitimate business purpose that is related to the official's performance of his lawful duties, such as to attend a demonstration of a Oncopeptides product or service;
- ii. for Government Officials, only appropriate and reasonable airfare and hotel accommodations should be provided to foreign officials taking into consideration the geographic location;
- iii. no cash per-diem payments to a foreign official are provided;
- iv. payments for travel or related expenses are made directly to the appropriate airline, hotel, or other vendor (reimbursement may be made directly to a

- government or authority the Governmental Officials represents only in the event that it is not possible to make such direct payment and a receipt for the expense is provided);
- v. the expenditure is legal under local law, the laws of the country where the foreign official resides, where the expenditure for the travel is incurred, and/or where the travel and related expenses are provided;
 - vi. Oncopeptides is not paying for the travel expenses of any family members or friends accompanying the foreign official;
 - vii. no stopovers are planned that are not directly connected to the business purpose of the travel,
 - viii. the foreign official's supervisor or organization has prior notice of the trip and has given its approval, preferably documented by a letter requesting that Oncopeptides pay for the expenses in question.

It is important to note that expenditures involving Government Officials are generally more heavily scrutinized by government authorities than expenditures involving private parties. Moreover, because many Anticorruption Laws prohibit improper provisions to Government Officials, one violation of this sort could expose Oncopeptides to liability in several countries. As a result, these requirements pertaining to Government Officials must be scrupulously followed by Oncopeptides employees.

Business Expenses for Private Parties: As stated above, many Anticorruption Laws and this Policy prohibit the provision of anything of value to any person, including private, commercial parties, if it is intended to induce conduct that amounts to a breach of an expectation that the receiving party would act in good faith, impartially, or otherwise abuse a position of trust. **All expenditures on private persons must be business related, moderate, reasonable and customary, given transparently and must not raise an inference that such provisions were provided in order to improperly influence the private person to not act with good faith.** Whether a provision amounts to an inducement to not act in good faith, impartially, or abuse a position of trust, is determined by analyzing whether the conduct would be considered a violation by a reasonable person.

Special caution must be observed in the case of ongoing business negotiations with the recipient's employer or principal or during an on-going assignment. A benefit that would otherwise be permissible may be considered improper on such an occasion. Greater caution must also be exercised with regard to benefits to recipients who have a decisive influence on decisions in favor for giver or Oncopeptides. e.g. in matters relating to purchases.

Benefits must be relevant in business terms. Events must have a connection with the business of the organization offering the benefit and may not be extravagant. An invitation that includes an accompanying person, e.g. a relative or friend, jeopardizes the business connection.

Improper Benefits: for example a) monetary gifts and loans of money, b) goods and services for private purposes and private discounts on goods and services, c) the right to use a vehicle, boat, holiday home or similar for private use, d) leisure or holiday travel, and e) benefits that may result in the giver gaining a hold over the recipient.²

Political Contributions: Oncopeptides reserves the right to communicate its position on important issues to elected representatives and other government officials. It is, however, always Oncopeptides's policy to comply fully with all applicable laws, rules, or regulations regarding political contributions. No Oncopeptides funds, facilities, or services of any kind may be paid or furnished to any candidate or prospective candidate for public office, to any political party, or to any political initiative, referendum, or other form of political campaign, unless explicitly permitted by applicable laws.

B. THIRD-PARTY INTERMEDIARIES (E.G., RESELLERS, DISTRIBUTORS, SALES AGENTS, CONSULTANTS, ETC.)

Liability: The Anticorruption Laws establish liability for improper provisions made indirectly to a foreign official or private person, as well as payments made directly. Oncopeptides and individual directors, officers, or employees may be liable for a payment made by a business partner, such as a supplier, joint venture partner, agent, or consultant, if Oncopeptides makes a payment or transfers other value to that third party "knowing" that it will be given to a government official or private party. Under for example US legislation, the FCPA, firm belief that the third party will pass through all or part of the value received from Oncopeptides to a government official, or an awareness of facts that create a "high probability" of such a pass-through, also constitute knowledge under this law. As such, third party must be investigated, also known as conducting due diligence, prior to their engagement with Oncopeptides to ensure their commitment to compliance with the Anticorruption Laws.

7. CONFLICT OF INTEREST

All Oncopeptides employees shall make business decisions based on the best interests of the Company rather than personal considerations or relationships. A conflict of interest arises when anything interferes with or influences the exercise of an independent judgment in the best interest of Oncopeptides. Situations in which personal interest may

conflict with, or even appear to conflict with, the interests of the Company must be avoided. Examples of situations to be particularly aware of is business opportunities, other employment or engagement and board assignments outside Oncopeptides. Oncopeptides requires that employees disclose situations or transactions that reasonably would be expected to give rise to a conflict of interest.

8. ACCOUNTING AND RECORDKEEPING REQUIREMENT

9. Corruption and bribery often lead to breach of legally accounting and recordkeeping requirements. Oncopeptides is required to follow strict accounting principles and standards, to report financial information accurately and completely, and to have appropriate internal controls and processes to ensure that accounting and financial reporting complies with applicable laws, regulations, and listing requirements.

9. INTERACTIONS WITH HEALTHCARE PROFESSIONALS

Interactions with healthcare professionals are subject to special rules in many countries which often impose stricter requirements than other Anticorruption Laws. This concerns, for example, the promotion, sales and marketing of medicinal products and the collaboration with healthcare professionals in the field of research, development, production and distribution of medicinal products.

(A) WHO IS A HEALTHCARE PROFESSIONAL?

The phrase “healthcare professional” is often defined broadly and includes physicians and pharmacists as well as any member of the medical, dental, pharmacy or other nursing profession or any other person who in the course of his or her professional activities may prescribe or apply or lawfully trade in medicinal products for human use.

A determination as to whether a healthcare professional is also a Government Official is frequently a challenging endeavor. In the health care realm, for example the US legislation FCPA has been interpreted by the United States Department of Justice to apply to healthcare professionals who are employed by or acting on behalf of a health care entity, if that entity is owned or controlled by a government body, such as healthcare professionals who work at a public hospital. Other countries may define healthcare professional differently. In case of any doubt in this respect, please contact the Legal Department for advice.

(B) PROHIBITED INTERACTIONS

Healthcare professionals must not be unfairly influenced in their decisions regarding therapy, prescriptions or procurement. Therefore, it is unlawful to offer, promise or grant the healthcare professional or any third party **any** unfair advantages. The unfairness of an advantage is determined by applicable laws and the determination can be difficult to

make. Thus, Oncopeptides is committed to the principle and practice that **no advantages** should be provided to healthcare professionals, regardless of the value of the advantage. It is prohibited to promise, offer or grant gifts or make donations to healthcare professionals. Personal incentives to induce healthcare professionals to prescribe or purchase Oncopeptides products or services are also prohibited.

Hospitality is only permissible during in-house training events and work breakfasts/lunches/dinners to a reasonable and socially acceptable extent and only in accordance with applicable law and regulations and agreements with local authorities and relevant bodies.

(C) INTERACTIONS WITH HEALTHCARE PROFESSIONALS THAT INVOLVE VALUE TRANSFERS

Many interactions with healthcare professionals involve value transfers. Some examples of these type of interactions include fee for consultancy agreements. Most of these interactions are documented by written contracts which frequently contain common terms and conditions.

These contracts should address common requirements. For example, compensation paid must be determined by fair market value for the services provided or the nature of the work performed; the services or agreement must fulfill a legitimate, articulated business need or interest of Oncopeptides; and any funding or payment of the arrangement must not be conditioned on the current or anticipated purchase or prescribing of Oncopeptides's products.

(D) INTERACTIONS WITH HEALTHCARE PROFESSIONALS NOT INVOLVING VALUE TRANSFERS

Interactions with healthcare professionals also occurs in circumstances where transfers of value do not directly occur. For example, promotional materials and advertising activities by Oncopeptides personnel or third party intermediaries working on behalf of the Oncopeptides, must be compliant with Oncopeptides policies, as well as relevant laws and regulations.

Sales representatives acting on behalf of the Oncopeptides must conduct themselves in compliance with Oncopeptides policies, as well as relevant laws and regulations. They must have appropriate training and knowledge of the Oncopeptides' products and services.

Interactions with healthcare professionals may occur in a variety of circumstances that are not specifically addressed in this policy. All arrangements and relationships with healthcare professionals involving Oncopeptides personnel must be compliant with Oncopeptides policies, as well as relevant laws and regulations.

10. ROLES AND RESPONSIBILITIES

All Oncopeptides employees are individually responsible for reading, understanding and complying with this Policy. Each employee is responsible for acting in accordance with this Policy, every line manager is responsible for making sure each team member has access to this Policy and related procedures. The line manager is also responsible for ensuring that relevant activities and internal controls are in place to prevent and detect bribery and corruption. Day-to-day reinforcement, including regular information on anti-corruption issues, as well as compliance follow-up, is part of every manager's responsibility, with the support of the Legal Department. Violations against the Policy can lead to disciplinary action, up to and including termination. In case of any doubt of the interpretation of this policy, the Legal Department should be contacted for advice.

10. REPORTING VIOLATIONS

Any director, officer, employee, consultant, temporary personnel acting on behalf of Oncopeptides, or its subsidiaries who learns of or suspects a violation of this Policy is encouraged to promptly report the matter to HR manager or Compliance or Legal personnel. It is Oncopeptides' strict policy to not retaliate on any employee for reporting in good faith any actual or potential misconduct. Oncopeptides highly encourages such reporting. The Oncopeptides Ethics Hotline can also be used to make anonymous reports.