CORPORATE GOVERNANCE POLICY

FOR

ONCOPEPTIDES AB (PUBL)

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1. Introduction

1.1 General

This policy has been adopted by Oncopeptides' board of directors and concerns Corporate Governance within Oncopeptides AB (publ) and its subsidiaries (collectively "Oncopeptides").

This policy provides the framework for how Oncopeptides manages activities related to Corporate Governance as well as defining roles and responsibilities in this area.

1.2 Document owner

The responsibility for the Corporate Governance policy rests with the CEO. This policy shall be reviewed and revised at least once per year. The CEO is responsible for ensuring that this occurs and that any change proposals are presented and decided upon by the board.

1.3 Changes / updates

All changes and updates to this document and/or the process/processes that are related to this document and the standardized templates shall be done by the document owner (see 1.2 "Document owner" above).

2. Policy regarding Corporate Governance

2.1 Board of Directors

The Board of Directors is responsible for the Board procedures, including instructions for the Audit Committee and Instructions for the Remuneration Committee and CEO instructions. These documents are the fundamentals of managing Oncopeptides together with other governing documents.

2.2 CEO

The CEO is responsible for defining, maintaining and running an appropriate organization capable of reaching Oncopeptides' vision and goals in accordance with the CEO instructions.

2.3 Governing documents

Oncopeptides has defined a structure for governing documents (governance fundamentals, policies, standard operating procedures, instructions, handbooks).

Policies and standard operating procedures apply to all employees in the organization (unless otherwise stated) and establish rules and boundaries for how Oncopeptides shall act in significant areas. It mandates conduct relating to business activities, where the consequences of non-compliance could have severe consequences for Oncopeptides. Policies and standard operating procedures are regulated within

Oncopeptides uniform format, based on business and risk as well as ethical values, appointed ownership and accountability for compliance, approval and yearly review/update by the Board of Directors in the case of the below areas which shall be covered by policies:

- Anti-corruption policy
- Corporate Governance policy
- Environmental policy
- Finance policy
- Information policy
- Insider policy (including Instructions for Insider List)
- IT-policy (including IT Handbook)
- Non-auditor services pre-approval policy
- Remuneration policy

The following areas shall be covered by policies updated and reviewed by the CEO or CFO:

- Alcohol and drug policy
- Expense and Travel policy
- HR Handbook
- Financial Manual
- IT Strategy
- Pension and Insurance policy
- Privacy Policy
- Quality Manual Policy
- Social Media Policy
- Work Environment Policy

In addition, certain areas shall be covered by standard operating procedures, as set forth in Appendix 1:

In addition to the policies and the standard operating procedures, Oncopeptides has a Code of Conduct with mandatory principles regarding management and employee behavior. Additional documents (e.g. handbooks and instructions) are developed when needed based on issues related to risk and management control.

2.4 Management of compliance

Oncopeptides shall comply with applicable laws and the governing documents mentioned above are a support for this. Management and employees have the responsibility for compliance within the working areas that they are responsible for.

Each policy has an appointed owner who is responsible for following up on the policies within Oncopeptides. The CEO with the support of the General Counsel is

responsible for reporting to the Board of Directors on Oncopeptides compliance once a year.

2.5 Business Processes

Oncopeptides has defined a number of processes for managing the business and delivering value. Descriptions (handbooks, instructions) within Oncopeptides shall be aligned with these processes. The CEO is responsible for the process structure within Oncopeptides.

2.6 Business planning and follow up

Oncopeptides shall continuously plan to achieve the vision and long term objectives.

Annually, Oncopeptides business plan and budget as well as appropriate reporting on follow up are presented to the Board of Directors. The CEO is responsible for the Business planning and follow up with support of the CFO.

2.7 Financial reporting

In order to meet the financial requirements a Finance Manual (instruction) shall be formalized. The Financial Manual shall give guidance and summarize the sections required to uphold a high standard of financial accounting and reporting.

The Financial Manual shall be updated annually and be approved by the CFO.

2.8 Risk Management

Oncopeptides identifies, assesses and manages risks based on the vision and goals. Risk assessment of strategic-, operational-, compliance- and financial risks shall be performed annually by Oncopeptides management and presented to the Audit Committee and the Board.

Defined controls/procedures mitigating identified risks shall be defined and implemented for each business process.

A self-assessment of defined controls / procedures mitigating identified risks for each business process shall be performed annually and reported to the Audit Committee and the Board. The CFO is responsible for the self-assessment process. See also the Risk Management procedure.

2.9 Crisis management

Oncopeptides must be prepared as best it can for a crisis of any kind that might reasonably be foreseen and shall have a business continuity plan in place. Crisis management is regulated in policies and procedures for Communication. The CEO is responsible for Crisis management.

Adopted at the board meeting held on February 17, 2021

List over Standard Operating Procedures

Access management Oncopeptides Stockholm office (v1.0)	OP-QUAL-00153
Annual Product Review (v1.0)	OP-QUAL-00931
Benefit-Risk Monitoring and Management (v1.0)	OP-QUAL-00566
Benefit-Risk Strategy & Oversight (v1.0)	OP-QUAL-00565
CDS and local labelling (v1.0)	OP-QUAL-00090
CMC Management (v1.0)	OP-QUAL-00394
Cardinal Health Integration (v1.0)	OP-QUAL-00806
Change Control Management (v1.0)	OP-QUAL-00135
Clinical Study Protocol Development (v1.0)	OP-QUAL-00024
Clinical Supply Chain Management (v1.0)	OP-QUAL-00044
Commercial Transportation from Europe to US_Documents and procedurce (v1.0)	OP-QUAL-00071
Compliance Policies for Medical Personnel (v1.0)	OP-QUAL-00031
Computerized System Validation (v1.0)	OP-QUAL-00002
Customer Creation (v1.0)	OP-QUAL-00805
Data Integrity (v1.0)	OP-QUAL-00115
Data Management Plan Development and Maintenance (v1.0)	OP-QUAL-00256
Data Validation Plan Development and Maintenance (v1.0)	OP-QUAL-00308
Development of Governance & Procedure documents (v3.0)	OP-QUAL-00001
Deviations and CAPA Management (v3.0)	OP-QUAL-00109
Distribution of Commercial Material (v1.0)	OP-QUAL-00081
Document Audits (v1.0)	OP-QUAL-00654
Document Retention and Archiving (v1.0)	OP-QUAL-00046
Electronic Signatures and Electronic Records (v1.0)	OP-QUAL-00089
Expanded Access Program (v1.0)	OP-QUAL-00736
Field Alert Management (v1.0)	OP-QUAL-00630
Forecast Global Drug Supply (v1.0)	OP-QUAL-00072
Global, Commercial Item register, Item Costing, Stock Valuation (v1.0)	OP-QUAL-00804
Handling of Fraud and Misconduct (v1.0)	OP-QUAL-00111
Handling of user IDs and signatures (v1.0)	OP-QUAL-00093
IT Change Management (v1.0)	OP-QUAL-00087
IT Periodic Review (v1.0)	OP-QUAL-00092
IT Risk Management (v1.0)	OP-QUAL-00303
IT Supplier Control and SLA Management (v1.0)	OP-QUAL-00104
IT Systems Business Continuity and Disaster Recovery (v1.0)	OP-QUAL-00116
IT Systems and Services Implementation (v2.0)	OP-QUAL-00048
Identification and Traceability Global Commercial Drug Supply, (v1.0)	OP-QUAL-00070
Independent Medical Education and Patient Education (v1.0)	OP-QUAL-00033
Inventory Global Commercial Drug Supply, (v1.0)	OP-QUAL-00073
Investigational Site Audits (v1.0)	OP-QUAL-00273
Investigator Initiated Trials (IITs) (v2.0)	OP-QUAL-00030
Investigator's Brochure (IB) (v3.0)	OP-QUAL-00022
Pharmacovigilance Literature Monitoring (v1.0)	OP-QUAL-00567
Product Quality Complaints (v1.0)	OP-QUAL-00524
Product Release (v1.0)	OP-QUAL-00629
Product return management (v1.0)	OP-QUAL-00705
Project Risk Management and Issue Escalation (v2.0)	OP-QUAL-00112

Publications (v1.0)	OP-QUAL-00032
Recall Management (v1.0)	OP-QUAL-00692
Regulatory Affairs Organization Related to CTA/IND (v1.0)	OP-QUAL-00026
Regulatory Inspections (v1.0)	OP-QUAL-00040
Risk Management (v1.0)	OP-QUAL-00439
SOP - Reconciliation of Adverse Events with MI, PQC and Patient Support (v1.0)	OP-QUAL-00895
SOP Intercompany sales handling (v1.0)	OP-QUAL-00803
SOP Invoice approval flow (v1.0)	OP-QUAL-00802
SOP Purchase Order approval flow (v1.0)	OP-QUAL-00801
SOP Vendor Registration & Approval (v1.0)	OP-QUAL-00800
SOP for Medical Information (v2.0)	OP-QUAL-00082
Safety Communications (v1.0)	OP-QUAL-00685
Serialization - overarching SOP (v1.0)	OP-QUAL-00578
Serious Breaches in Clinical Trials (v1.0)	OP-QUAL-00021
Sponsor Oversight in a Clinical Trial (v2.0)	OP-QUAL-00020
Statistical Analysis Plan Development and Maintenance (v1.0)	OP-QUAL-00291
Statistical Programming (v1.0)	OP-QUAL-00295
Subject Information and Informed Consent Form (v1.0)	OP-QUAL-00025
System Audits (v1.0)	OP-QUAL-00265
System Maintenance Procedure - DocuSign (v1.0)	OP-QUAL-00525
System Maintenance Procedure for Veeva Vault Safety (v1.0)	OP-QUAL-00224
Systems Maintenance Procedure Adaptive Insights (v1.0)	OP-QUAL-00594
Temperature Excursion (v1.0)	OP-QUAL-00930
Training and Development of staff (v1.0)	OP-QUAL-00004
Trial Master File (v1.0)	OP-QUAL-00366
Veeva Quality Suite System Maintenance Procedure (v3.0)	OP-QUAL-00003
Vendor Audits (v1.0)	OP-QUAL-00272
Vendor Selection and Management (v1.0)	OP-QUAL-00045
Vendor and Supplier management for Commercial purposes (v1.0)	OP-QUAL-00274
iEnvision Datavision System Maintenance Procedure (v1.0)	OP-QUAL-00215