

Code of Conduct

Ethics and integrity

Vimian Group and its segments Nextmune, Movora, VetFamily and Indical Bioscience

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vimianTM

Introduction

- / Vimian Group AB (publ) and its subsidiaries, including all subsidiaries belonging to the segments Nextmune, Movora, VetFamily and Indical Bioscience collectively (“Vimian”) are committed to high standards of ethical business conduct. In line with this commitment, this code of conduct (the “Code”) aims to provide guidance on how we, Vimian employees and contractors (“Vimians”) live up to the ambition of acting with impeccable ethics and integrity.
- / Everything we do in connection to our work at Vimian will be, and should be, measured against high standards of ethical business conduct.
- / All Vimians have a personal responsibility to “live the code” by incorporating it into their work, as well as encouraging other Vimian colleagues to do the same.
- / This Code applies to all employees, contractors and applicable business partners of Vimian.



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Know and follow the code

As an employee or contractor, you need to be familiar with the information contained in this Code, our Vimian Group policies, as well as other policies and procedures that may apply to your segment, function or role.

- / A Vimian failing to follow the Code can result in disciplinary action, including termination of employment.
- / A contractor failing to follow the Code can result in termination of its relationship with Vimian.



Speak up (incl. whistleblowing)

If you have a question or ever think that one of your fellow Vimians or the company as a whole may be failing to follow the Code, any internal policies or the law, do not be silent. We want to hear from you.

/ **Questions or concerns:** If you have a concern or question regarding the Code or any internal policies then raise it with:

/ The reporting manager or Human Resource representative

/ Legal, legal@vimian.com

/ **Wrongdoing:** If you believe a violation of law or the Code has occurred, or any category of wrongdoing then promptly raise your concern with:

/ Your reporting manager or Human Resource representative

/ Legal, legal@vimian.com

/ Through the [Vimian's whistleblowing channel](#)



Non-retaliation

When raising any concerns related to violation of the Code, policies or the law you shall feel comfortable that you will not be subject to any form of retaliation.

/ Retaliation is prohibited

Vimian prohibits retaliation against any colleague of ours who reports or participates in an investigation of a possible violation of our Code, policies, or the law. If you believe you are being retaliated against, please submit a report in Vimian's [whistleblowing](#) channel or contact [Legal](#). Protection against retaliation does not apply if it can be established that a criminal offence has been made when gathering the information for the report or if the report itself constitutes a criminal offence.



Act with ethics and integrity

As a Vimian always act in a professional and ethical manner knowing that your behavior reflects back on the group.

/ **Lead by example**

You are always a representative of Vimian - Lead by example and be a role model for ethical behavior.

/ **Protect non-retaliation**

As a leader within Vimian, do your part to ensure that no one who speaks up suffers retaliation.



Be supportive and inclusive

Vimian welcomes you for who you are and encourages you to be your true self.

/ **Foster a supportive environment at work**

Vimians are expected to do their best to support a work environment where openness, integrity and honesty are valued, where everyone feels comfortable to ask questions and report potential concerns or violations.

/ **Encourage freedom of association**

Encourage your colleagues to be who they are and ensure freedom of association to be effectively enjoyed without discrimination on grounds of sexual orientation or gender identity.



Do not discriminate, harass or bully

Vimian strives to have a positive and creative atmosphere at work.

/ **Make everyone feel included**

Our workplace environment should be free from fear of discrimination or harassment. Do not discriminate, harass or bully in any form— verbal, physical, or visual.

/ **Speak up**

If you believe you or a colleague has been bullied, harassed, or discriminated against by anyone at Vimian, or by a Vimian partner or vendor, we strongly encourage you to immediately report the incident to your manager, Human Resources, Legal or through the whistleblower channel (see the section “Speak up” above).



Protect confidential information

Vimian values its confidential information. Do not disclose confidential information of Vimian or its partners, employees and other stakeholders to any third party unless you are authorized to do so.

/ **Properly label**

Properly label confidential information to specify how it should be handled, distributed and potentially destroyed.

/ **Store and share in a safe manner**

Ensure confidential information does not reach unauthorized individuals. Be very and mindful when you provide confidential data to anyone inside or outside Vimian. If applicable, ensure that confidentiality undertakings are in place before disclosing the confidential information.

/ **Protect confidential information from partners and competitors**

Just as you are careful not to disclose confidential Vimian information, it's also important not to disclose any confidential information from our partners. Further, we compete fairly with respect for our competitors. We do not want their confidential information or any confidential information belonging to any of Vimian's former employers. Never take advantage of a competitor's or former employer's confidential information.

/ **Keep it to yourself, even at home**

Some of us will find ourselves having family or other personal relationships with people employed by our competitors or business partners. Be mindful, don't tell your significant other or family members anything confidential, do not share passwords, and do not seek confidential information from them about their company.

Examples of **confidential information** are information about potential acquisitions, divestitures and investments, business plans, sales and profit figures, trade secrets, pricing, new product or marketing plans, research and development ideas, intellectual property and manufacturing processes.

Protect personal information

Vimian values the personal information of its employees and stakeholders highly. Do not disclose personal information of Vimian or its partners, employees and other stakeholders to any third party unless you are authorized to do so.

/ **Keep it safe**

Ensure that the personal information you process is safe, secure, accurate and according to the privacy policy of the relevant company in Vimian and applicable laws.

/ **Collect only what is needed for the time needed – then destroy it**

Only collect, access and use personal information for business purposes. Be mindful of which information that is really needed and keep only personal information which you justify that you need. Ensure personal information is not retained for a longer period of time or reason than can be justified by law and that its properly destroyed.

/ **Make it accessible for the individual owning it**

We shall ensure that individuals whose personal information is held by Vimian or its segments can access, review and correct their information.

/ **Same procedure for colleague's personal information**

Colleague's personal information is collected and used for the purpose of the employment relationship with Vimian and is kept as long as required by Vimian policy and the law.

Personal information is any information related to an identifiable person.



Avoid conflicts of interest

/ Be mindful of outside Vimian engagement


Vimian encourages you to engage in activities outside of work if it motivates you, brings you purpose and develops you as a person. However, avoid outside engagement e.g. outside employment, advisory roles and board seats with Vimian competitors or business partners when your judgment could be, or could appear to be, influenced in a way that could harm Vimian. It should also be avoided that you or a family member has a significant investment in one of our customers, competitors or third parties that work with Vimian.

/ Be mindful of accepting gifts

Accepting gifts and other business courtesies from a Vimian competitor or business partner can easily create the appearance of a conflict of interest, especially if the value of the item is significant. Vimian's [Anti-Bribery and Anti-Corruption policy](#) provides specific guidance on when it is appropriate to accept gifts or any other business courtesy.

/ Be mindful of relationships at work

Certain relationships (i.e. romantic, physical, or familial) within Vimian colleagues or stakeholders may compromise or be seen to compromise your ability to perform your work responsibilities, may create uncomfortable or conflicted positions, and may raise issues of fairness, favoritism, or harassment. Therefore, be mindful of how your relationships within Vimian could impact or be perceived by others.



A **conflict of interest** is a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of Vimian. Avoid conflicts of interest and circumstances that would appear as a conflict.

If you are in doubt, review the situation with your manager, HR or legal representative.



Do not take part in bribery or corruption

Vimian has zero tolerance for bribery and corruption. Do not bribe anybody, anytime, for any reason.

/ **Comply with all applicable laws**

As a multinational group, Vimian shall comply with applicable national and extraterritorial anti-corruption laws, including the United States' Foreign Corrupt Practices Act (the "FCPA"), the United Kingdom Bribery Act (the "UKBA"), the Swedish Penal Code and any other anti-bribery and anti-corruption laws in the markets where we do business.

/ **Monitor laws applicable to the country(ies) you operate**

Keep in mind, monitor and follow restrictions on gifts and hospitality in your country.

Please see [Anti-Bribery and Anti-Corruption policy](#) for further guidance.



Anti-trust/anti-competitive practices

Vimian believes in free and open competition. Do not engage in unethical or illegal anti-competitive business practices, including:

/ **Stick to fair competition**

- Never coordinate with customers to maintain or influence resale prices.
- Never agree with a competitor to coordinate bidding to a customer or agree with a customer or competitor not to deal with other companies.
- Never take unfair advantage of a position of market dominance by engaging in anti-competitive activity.

Fair competition or anti-trust laws are complex and compliance requirements can vary depending on facts and circumstances. Consult with the Chief Financial Officer in your segment or the General Counsel of Vimian if you have any questions or concerns about anti-competition laws.



Financial integrity and money laundering

Always act with financial integrity to ensure corporate professionalism. For example, ensure that money is appropriately spent, our financial records are complete and accurate, and internal controls are honored. Do not engage in any money-laundering, or in anything which may appear as money-laundering. In particular:

/ **Stick to the truth**

Make sure that financial entries are clear and complete and do not hide or disguise the true nature of any transaction. Never record false sales, shipments, or record them early, understate or overstate known liabilities and assets or defer recording items that should be expensed.

/ **Do not maintain undisclosed or unrecorded funds, assets or liabilities**

/ **Be mindful and truthful**

Be mindful of company expenses and always be accurate, complete and truthful when submitting time sheets, research, quality and safety results.

/ **Watch out for suspicious payments**

To help prevent and detect money laundering and terrorist financing, watch out for suspicious payments e.g. payments made from personal accounts instead of business accounts; and funds from financial institutions or third parties without a logical relationship to the customer or third party.



Trade sanctions

Many laws govern the conduct of trade across borders. We are committed to complying with all such laws. Do not engage in any commercial relationship, directly or indirectly, with parties being subject to trade sanctions.

- / **Know the requirements of the country in which you operate**

If you are involved in international operations, logistics, finance, meeting planning, manufacturing and supply, research and development, regulatory or legal, it is especially important that you know and comply with the requirements associated with the countries in which you do business.

- / **Maintain relevant and required records**

Maintain required import, export and customs records at each of Vimian's business locations.

- / **Consult legal in the case of boycott**

If you receive a request to participate in a boycott or are asked about Vimian's position on a boycott, contact the General Counsel immediately.



Protect and promote health and safety

Vimian promotes a healthy, safe and violence free work environment, and urges all its employees and contractors to also promote this at all times. In particular, keep in mind the following:

- / **Stop any work you feel may be unsafe**

- / **Speak up**

You are encouraged to speak up and ask for help if you are not feeling well - mentally or physically.

- / **Know the emergency and security procedures that applies where you work**

- / **Always be sober at work**

Be sure that your performance is not impaired by alcohol or any drugs, including prescriptions and over-the-counter medications, while conducting Vimian related business, regardless of time or location.

- / **Report injuries, regardless of size**

Report injuries on the job, regardless of size, to a manager immediately. Do not assume that a colleague have made a report.

- / **Ensure third parties are informed on safety and security procedures**

Inform relevant third parties such as contractors and others we work to follow our safety and security procedures.

If the situation is life-threatening or an emergency, call your local police, fire, or other emergency responders first, and then report it to HR, your manager and/or people@vimian.com.



Quality and safety of products and services

Our customers rely on our high-quality products and services. At Vimian, we take quality and safety issues seriously. Make sure to report any adverse events and issues that you become aware of.

/ Report all adverse events

Report all adverse events and product and service issues to regulatory affairs, your manager, HR or Legal. You may learn of such events and issues in many different ways — through telephone calls, letters, emails, websites and completed response forms from Vimian-sponsored marketing programs, or in meetings or casual conversations at work or even in social settings.

/ Forward all adverse incidents to pharmacovigilance

Any information about an adverse event must be forwarded to a pharmacovigilance or regulatory colleague within 24 hours. Any product issues which are not defined as adverse events should be reported.

Adverse events are defined as unexpected medical occurrences associated with the use of a drug.

Only some of Vimian's products are subject to adverse event reporting. In doubt whether a particular product is comprised by the adverse event reporting obligations, please check with your colleagues in regulatory affairs.

Protect animal and human rights and welfare

Vimian supports international efforts to promote and protect animal and human rights. Vimian does not tolerate abuse of animal or human rights in any part of our value chain.

/ **Comply with all applicable human rights and labor practice laws and regulations**

Comply with all applicable laws, regulations, standards and business practices governing human rights and labor practices. E.g., UN Universal Declaration of Human Rights, UN Global Compact. This expectation includes upholding internationally recognized human and employment rights of workers and treat them with respect and dignity. As well as complying with international and local regulations covering the manufacture, import, and transport of hazardous materials, including documentation, registration, and notification requirements.

/ **Comply with all applicable animal welfare laws and regulations**

Adhere to any legal requirements of animal care and welfare including to respect the animals with which they work, ensuring that all five basic needs are met. The five needs include three physical needs - diet, environment and being protected from pain, injury and disease - and two needs for mental wellbeing - the need to be with or without other animals of the same species and the need to behave naturally. If further guidance is needed, see Vimian's [Animal Welfare policy](#).

Report any suspicion or evidence of animal or human rights abuses to [Animal Welfare](#), [Legal](#) or anonymously through Vimian's [whistleblowing channel](#).



Protect the environment

Vimian is committed to transition towards a net-zero climate impact company across the value chain and empower our customer with solutions to do the same. This means using the world's resources wisely and growing our business in a way that is considerate of the global community.

- / **Comply with all applicable environmental laws and regulations**

- / **Ensure proper management of waste and hazardous substances**

- / **Know and understand Vimian's Climate and Environment policy.**

- / **Be proactive**

You are encouraged to be proactive and look for ways that we can reduce waste and use energy and natural resources more efficiently, contact your segment's sustainability lead or the Group's Sustainability Manager.

- / **Report concerns**

Report concerns about potential environmental risks to your manager, to your segment's HR or sustainability lead or the Group's Sustainability Manager.

Read more about our commitment to protect the environment in our Climate and Environment policy.



Protect our assets

Each of us is entrusted with the care of Vimian's assets and we must be proactive in protecting them from loss, damage, theft, waste and improper use.

/ **Protect intellectual property**

Ensure to protect our intellectual property and respect the intellectual property rights of others.

/ **Be mindful of unauthorized devices**

Unauthorized devices, such as home computers, may not be used to transmit, store or work on Vimian proprietary information.

/ **Be wary of cyber security - protect Vimian's data and information systems**

Ensure data and information systems are protected from accidental and intentional breaches. In particular:

- Be alert to phishing scams or other attempts to uncover corporate information.
- Do not open suspicious links in emails, even if you know the source.

Assets include physical property, facilities, equipment, inventory and supplies, financial resources, confidential information, files and documents, computer networks and their content.

Intellectual property (IP) includes patents, trademarks, trade secrets, copyrights, and scientific and technical knowledge.



Contact

/ HR

- Contact HR in your segment or people@vimian.com

/ Legal

- Contact Legal/General Counsel at legal@vimian.com

/ Regulatory affairs and pharmacovigilance

- Contact regulatory affairs, compliance or pharmacovigilance in your segment

/ Whistleblowing

- <https://vimiangroup.whistlelink.com/>

/ Sustainability

- Group Sustainability Manager at ellen.brostrom@vimian.com

/ Animal welfare

- Animal welfare advisor at animalwelfare@vimian.com

/ Vimian policies and frameworks

- Anti-Bribery and Anti-Corruption policy
- Animal Welfare policy
- Climate and Environment policy
- Supplier Code of Conduct



Policy implementation

- / Reviewed by General Counsel 2022Q3
- / Signed off by segment representatives 2022Q3
- / Signed off by the Executive Management Team on 2022.11.08
- / Approved by the Board of Directors 2022.11.15
- / Shared with all employees per email and townhall 2022Q4-2023Q1
- / Published on website available to all stakeholders 2022Q4
- / Training for all employees offered on a yearly basis
- / Communicated to investors to ensure awareness of the Code 2022Q4

Accountability

Every employee and contractor of Vimian is accountable to comply with the Code.

Awareness

Each member of Vimian's Executive Management Team shall ensure that his/her organization is aware of the Code and its content.

Overall ownership of the Code of Conduct

Vimian's CEO and the General Counsel shall ensure that the Code is relevant and implemented across the Vimian Group.

