

ARMIS

BIOPHARMA



CODE OF CONDUCT — November 2017



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DEAR ARMIS BIOPHARMA EMPLOYEES,

Our mission at Armis Biopharma, Inc. (“Company”) is to reduce pain, suffering, death, and the additional expense of infections while serving our shareholders, community, and associates. We aspire to be the global leader in the prevention and treatment of infections focusing primarily on drug resistant infections, surgical site infections, and wound care. We achieve this through novel science, product development and “Best in Class” operations while fostering a culture of excellence.

As we strive to reach our goals it is important to remember that our actions are under more scrutiny than ever in our high-tech and heavily-regulated world. With that in mind, our reputation as an ethical leader in the biopharmaceutical industry is one of our most valued assets.

To nurture and grow our exceptional reputation, we must hold ourselves to the highest standards as we serve our patients, employees, shareholders, and community—even, and especially, when faced with difficult or inconvenient choices.

To do this, we must live our Company values in all of our daily activities:

- Execution
- Accountability
- Initiative
- Resourcefulness
- Integrity
- Trust
- Respect

Each of these values are integral to our success as a company and are reflected throughout the Armis Biopharma’s Code of Conduct (“the Code”). All employees and third parties who conduct work on behalf of our Company are expected to have a full understanding of the Code, as ethical decision-making based on the Code is the foundation of our continued success.

Each of us has a personal responsibility to uphold the Company’s values. No written code or policy can guarantee compliance with law or ethical decision-making. Therefore, our



SECTION 1: OUR COMMITMENT TO ETHICAL BUSINESS PRACTICES

Armis Biopharma is committed to executing all of our activities, large and small, with the highest ethical standards. We are a good corporate citizen, committed to patients and our customers, shareholders, employees, and a safe workplace environment.

1.1 Why a Code of Conduct?

Today’s compliance environment is highly dynamic but our approach to ethics and compliance is unwavering, proactive, and strategic as regulatory and public expectations continue to evolve. Our reputation as a company, as leaders, and as individuals depends on our approach to ethics.

As an employee or trusted business affiliate of Armis Biopharma, reading and understanding our Code of Conduct is an important first step in getting to know our history, our culture, and our expectations. Nothing is more fundamental to your success at Armis Biopharma than understanding and demonstrating the ethical standards explained in our Code. The Code represents our commitment and respect to our stakeholders and to upholding ethical and reliable practices when conducting business wherever we operate in the world.

1.2 Reporting Honestly

Armis Biopharma maintains an open-door policy for raising questions about the Code, our policies and procedures, or business practices about which our employees have questions or concerns. All employees and trusted business affiliates must report any instance of known or suspected acts of non-compliance or potential violations of the Code in the order that concerns can be quickly and effectively addressed. Doing the right thing may not always be easy, but *accountability* and *integrity* are two critical values of Armis Biopharma. As such, our employees play an important role in maintaining a safe and ethical workplace. If you have information regarding a suspected violation

LIVING THE CODE

Q: Some of the countries I conduct business in have different cultures and laws which may conflict with this Code (e.g., provision of gifts or entertainment to guests). Does the Code apply to everyone globally?

A: Yes. The Code applies to all Armis Biopharma employees and anyone who conducts business on behalf of the Company. If you have any questions regarding whether or not an activity may or may not be within compliance of this Code, or for an exception based on extenuating circumstances, contact the Legal Department. As a general matter, where the Code is stricter than or conflicts with local law or customs, the Code will typically apply.



1.3 Obligations and Responsibilities of Team Leaders and Others When Receiving Reports of Potential Code Violations

Team Leaders and others who receive reports of potential Code violations play an important role in upholding the Code of Conduct. At Armis Biopharma, we encourage employees to talk to their team leaders about their concerns. We expect Team Leaders to take all employee concerns seriously. While Team Leaders may not be able to give an answer immediately, they are expected to listen carefully and take appropriate action following the report. Team leaders and others who receive reports of potential Code violations must treat those who raise concerns with respect and listen attentively to their concerns. Team leaders are required to follow the escalation procedure the Company has put in place for handling and responding to reports. This means that in some cases, managers are required to involve Human Resources, Legal, and/or Compliance to help resolve an issue. See our *“Responding to Concerns of Non-Compliance Policy”* for more information.

LIVING THE CODE

- Let team members know that you are available to discuss their concerns.
- Take team members’ questions and concerns seriously.
- Once a potential Code of Conduct violation is reported to you, feel free to seek guidance from the CCO before responding.
- Support employees who raise concerns honestly and treat them with respect.
- Never let employees feel that their concerns are being ignored.

1.4 Non-Retaliation

Armis Biopharma is committed to protecting those individuals who report potential or actual violations of the Code in good faith. Our Company **strictly prohibits** retaliation, and will not accept any form of retaliation against any person who:

- Seeks clarification or advice about a particular business practice or compliance with the Code of Conduct;
- Reports what he or she believes is a violation of our Code, our policies, or applicable laws and regulations or
- Cooperates in an investigation of a potential violation of our Code, our policies or applicable laws and regulations.



You will not lose your job or your benefits, or be demoted, suspended, threatened, harassed, or discriminated against for raising a Code of Conduct concern honestly, or for truthfully participating in a Company investigation. Employees who engage in retaliation or intimidation will be subject to disciplinary action, up to and including termination.

1.5 Violations of the Code

Violations of the Code of Conduct are serious offenses. Violating the Code, our policies, or applicable laws and regulations may result in disciplinary action up to and including termination. Misconduct may include violations of this Code and Company policies, failure to raise a known or potential issue, failure to cooperate with an investigation, or intimidating or engaging in retaliation against an employee who raises a potential issue or provides information during an investigation.

Where violations of the Code are also a violation of applicable law or regulation, you may also be subject to fines, penalties, criminal prosecution, or other legal remedies imposed by a governmental agency or a court. See our *“Investigation and Discipline Policy”* for more information.

SECTION 2: OUR COMMITMENT TO PATIENTS

Everything we do at Armis Biopharma is in the interest of enabling our patients to live healthier lives.

2.1 Commitment to Patients

At Armis Biopharma, we put patients first. We can only gain our patients’ and customers’ trust and respect by focusing on their needs. That means always thinking from their perspective. We must always put their safety first, provide them with clear and up-to-date product and scientific information, and always promote our products with accountability and integrity. Our values demand that we think about and protect their interests at all times. Protecting patients means making sure that our scientific engagement is distinct from the promotion of our products. Legally and ethically, we have a responsibility to never disguise or misuse our research to influence healthcare professionals and others inappropriately. All of our promotional activities and materials must conform to high ethical, regulatory, and scientific standards. They must be based on valid scientific evidence and comply with all applicable laws, regulations, and industry marketing codes.



LIVING THE CODE

- Only use promotional materials and communications that have been approved by the appropriate supervisor, are on label, accurate, truthful and not misleading, and comply with applicable regulatory standards.
- Do not promote the use of any product beyond its approved labeling or authorization for use.
- Do not mischaracterize or make comparative statements about competitors' products without authorization.
- Provide fair balance by presenting the full picture of our products, including a summary of all safety information.

Our commitment to serving patients also means that we maintain current product information to reflect current safety and efficacy information. We have medical experts on hand to answer any questions from healthcare professionals accurately and promptly. We are committed to serving as a resource to the public health by providing timely reports on side effects, adverse reactions, and other potential issues. We will discuss any corresponding actions with regulatory authorities when appropriate.

2.2 Research and Development

Being patient-focused demands that we carry out all of our research projects with the highest ethical standards. We apply current Good Clinical Practices to our work, from clinical trial design and

investigator selection to safeguarding patients' personal information and sharing research data, we do everything we can to keep patients safe and maintain their trust while developing products that will meet their needs.

The safety and well-being of patients who volunteer to participate in our sponsored clinical trials is paramount. We are committed to conducting human subject research to the highest ethical, legal, medical, and scientific standards around the globe. We protect those who participate in our research to the best of our ability by closely following strict research protocols and standards.

To advance our collective body of scientific knowledge, we share our expertise, resources, intellectual property, and know-how with external researchers and the scientific community where appropriate. We provide external researchers with access to our anonymized trial data so the valuable contributions made by volunteers who participate in our research can be used in other studies. We always protect patient confidentiality and ensure information is used only for valid scientific research.



2.3 Product Quality and Safety

Putting patients first means always making sure our products are of the highest quality and are safe to use. This commitment demands that we implement and follow strict guidelines that control both manufacturing and supply. Because the needs of our patients and consumers are always our primary concern, it is important to remember that there is a *person* at the end of the supply chain. By living by this value, we also help to protect our reputation, accountability, and profitability.

Our quality management system (“QMS”) ensures we comply with global and local regulations and assures product safety, quality, and efficacy. We use it to help us maintain a state of control over our products and processes. We also use it to guard against the threat of counterfeit products, which frequently lack the active ingredients necessary to combat the illnesses our products are designed to treat or contain impurities that may actively harm our patients and consumers. As Armis Biopharma employees, we are all responsible for reporting any suspected counterfeit pharmaceutical, vaccine, or healthcare products.

LIVING THE CODE

- **Q.** What is a legally protected characteristic?
- **A.** These bases, or as otherwise governed by the applicable law in your job location, may be legally protected characteristics that may not be used as the basis of a job-related decision:
 - Race
 - Religion
 - Gender
 - Ethnic origin or ancestry
 - Age
 - Sexual orientation or gender identity
 - Military or veteran status in the US
 - Marital, familial, or civil status
 - Disability
 - Pregnancy
 - Nationality

SECTION 3: OUR COMMITMENT TO EMPLOYEES

Armis Biopharma treats its employees with respect and is committed to providing a safe and respectful workplace for everyone.

3.1 Diversity, Inclusion, and Non-Discrimination

Our values demand that we treat everyone with dignity and respect. By doing so, we attract and retain the best and brightest people. We also reflect the diversity and characteristics of the communities in which we operate and the customers we serve. We do not tolerate harassment or discrimination of any kind. To fulfill our commitment to having a globally diverse workforce and providing equal employment opportunities, we:



- Recruit, promote, and support the professional development of a diverse workforce;
- Hire, train, promote, and compensate based on the ability, achievement, experience, and conduct of our employees without regard to race, ethnicity, gender, sexual orientation, age, religion, creed, national origin, political affiliation, disability, legally-protected leave, veteran status, and all other categories protected by applicable law;
- Recognize and utilize the diversity of each other’s talents, abilities, and experiences; and
- Be open to all perspectives and help others feel comfortable expressing those perspectives.

3.2 Safe and Healthy Workplace

At Armis Biopharma, the safety of our people is crucial—it helps us maintain a strong, resilient, and high-performing workforce. We want everyone to feel safe and protected when working for Armis Biopharma. We believe that occupational injuries and illnesses are preventable and can be eliminated. No production goal, cost savings, time savings, or competitive advantage is worth an injury of any kind.

We are committed to:

- Ensuring that employee safety is always a top priority;
- Integrating our belief that all workplace injuries and illnesses are preventable into our research and development, engineering, product development, manufacturing, delivery, and sales activities;
- Providing a workplace that meets or exceeds applicable occupational safety and hygiene

LIVING THE CODE

- **Look after yourself:** Do not take any action you consider unsafe or perform any task for which you are not trained or do not have the proper tools.
- **Look after your coworkers:** Immediately confront anyone performing or about to perform an act or task you consider to be unsafe. Prevent anyone from performing a task for which they are not properly trained.
- **Listen to your coworkers:** If someone confronts you about a task you are doing, stop and resolve the concern with respect, requesting assistance from another if necessary, before continuing.



standards and technical guidance based on best practices;

- Continually improving our occupational safety and hygiene performance; and
- Expecting all Armis Biopharma personnel to contribute to safety improvements.

If you identify a potential hazard or feel that certain behaviors or practices may cause harm, please raise your concern.

3.3 Drug and Alcohol Free Workplace

At Armis Biopharma, we recognize that drug and alcohol abuse pose a direct and significant threat to our goal to maintain a strong, resilient, and high-performing workplace. As such, Armis Biopharma is committed to a substance-free working environment for all of our employees. To fulfill this commitment, all employees must:

- Always report to work free from the influence of alcohol or illegal drugs, including all drugs that are prohibited for use pursuant to federal law. Being impaired on the job has negative consequences on our productivity and could put employees, visitors, and patients at risk.
- Never bring illegal drugs or medications that have not been properly prescribed to work, use them at work, or give them to others.
- Promptly report any suspicions that a colleague or business partner may have illegal drugs or be under the influence of drugs or alcohol at work to your manager, a more senior manager, Human Resources, Legal, Compliance, or the Ethics and Compliance Hotline.



3.4 Protection of Personal Information

As part of our everyday work, many of us have access to personally identifiable information of our employees and customers and even protected health information of patients. Changes in healthcare will increasingly require us as well as our customers to utilize personal information and so we must remain mindful of these concerns as our market space evolves as a global company, our strategy and daily operations necessitate the collection, use, and, at times, sharing of personal information about patients as well as our customers, shareholders, and employees.

Laws around the world impose responsibilities on the Company to protect and lawfully use personally identifiable and protected health information. Failure to meet our responsibilities could result in government actions, damage to our reputation, potential lawsuits, fines, and penalties.

3.5 Use of Company Systems

Each of us at Armis Biopharma is entrusted with the proper use of Company systems and resources. All Company data should be treated as confidential, and all portable Company devices, hardware, and accessories should be properly maintained and in your physical custody at all times. Company workstation security standards should also be followed without exception. Although the incidental and occasional personal use of our systems subject to certain restrictions is permitted, these systems and resources should be used primarily for legitimate business purposes. Company systems and devices should never be used to send or access inappropriate, discriminatory, sexually explicit, or disruptive material. Except where required by local law, the privacy of information stored on or sent to-or-from Company systems is not guaranteed. Armis Biopharma reserves the right to inspect Company-owned files at any time and without prior notice.

LIVING THE CODE

- Avoid collecting, using, or accessing personal information unless you have a legitimate business purpose and are authorized to obtain the information.
- If you are authorized to collect personal information, always follow intake, handling and storage processes in accordance with Company policies.
- Do not share personal information with unauthorized individuals or entities.
- Take steps to reasonably ensure that personal information is appropriately secured in accordance with Company policies and applicable laws.
- In the event of an actual or potential loss or unauthorized disclosure of personal information, immediately report the incident to the General Counsel or the Ethics and Compliance Hotline.



3.6 Workplace Violence

Armis Biopharma is committed to a violence-free workplace. We should each report any act, whether physical or psychological, which threatens or harms an employee in a violent or potentially violent manner. Weapons are not permitted while on Company premises or at Company functions.

Any reported situation which contains even the slightest possibility for workplace violence, even if meant as a joke, will be investigated by Human Resources.

LIVING THE CODE

- Avoid actions that create or even appear to create conflicts of interest with the Company.
- Never use our position at Armis Biopharma for improper personal gain.
- If you think that you, a family member, or another Armis Biopharma business partner has an actual potential or perceived conflict of interest, contact your team leader or the Legal Department and have the relationship reviewed.

SECTION 4: OUR COMMITMENT TO SHAREHOLDERS

Armis Biopharma will operate in the best interests of the Company and our shareholders, be forthright about our operations and performance, and exercise care in the use and protection of our assets and resources.

4.1 Conflicts of Interest

When conducting Company business, each of us has a duty to act in the best interests of the Company and to avoid actual, potential, or perceived conflicts of interest. A conflict of interest arises when personal interests, activities, or relationships interfere with our ability to make sound, objective decisions in the Company's best interest. Some conflicts of interest are obvious, such as receiving kickbacks or personal favors for awarding Company business to a vendor. Other conflicts of interest may be less obvious, such as conducting business with a firm owned by a close family member when that firm appears to be offering the best value. Conflicts of interest come in many forms, and you are encouraged to discuss any and all possible arrangements with your supervisor and the Legal Department to ensure they are avoided.

Some examples of actual or potential conflicts of interests are as follows:

4.1.1 Outside Employment

- You or a close relative is employed by, provides services for, or receives payment from any competitor, supplier, or customer.



- You or a close relative owns a business that does business with Armis Biopharma.
- You have outside employment or business interests that interfere with your ability to do your job at Armis Biopharma (e.g. by causing you to spend Armis Biopharma time on your outside employment).
- You conduct business on the side for your personal benefit (not for Armis Biopharma) with any Armis Biopharma vendor, supplier, customer or contractor.

4.1.2 Financial Interests

- You or a close relative has an investment or other financial interest in a privately-owned supplier, competitor, or customer of Armis Biopharma.
- You or a family member owns more than 1% of the stock of any competitor, supplier, or customer of Armis Biopharma.

4.1.3 Public Service

- You volunteer at a charity or other organization that is considering an issue involving Armis Biopharma.
- You raise money for charity during working hours (except when sponsored by Armis Biopharma).
- You ask customers or suppliers to make charitable donations (except where sponsored by Armis Biopharma).
- You are asked by customers or suppliers to make charitable donations (except where sponsored by Armis Biopharma).

LIVING THE CODE

- **Q:** A vendor has invited me to speak at one of their meetings. Is that okay?
- **A:** It depends. Obtain your team leader's approval before speaking at any external events. Do not disclose any confidential information when presenting to outsiders. Do not accept payment of expenses if it could cause a conflict of interest, such as the vendor gaining favorable treatment from Armis Biopharma.
- **Q:** Do I need to seek approval first before emailing photos of Armis Biopharma processes, equipment, or machinery to third parties?
- **A:** Yes. You must seek permission first.

4.1.4 Speeches and Presentations

- You are offered a fee for outside speeches or presentations in connection with your work for Armis Biopharma.

4.1.5 Personal Relationships and nepotism

- You supervise or are supervised by a close relative or partner.



- You are considering hiring a close relative or partner as an employee or contractor.

4.1.6 Board Memberships

- You are considering accepting a board appointment but you are concerned that the commitment may interfere with your job.
- You are on a board that is considering a decision that may affect Armis Biopharma

4.1.7 Political Relationships

- You work on political campaign during working hours.
- You are expressing political views in a setting where your audience may think you are speaking on behalf of Armis Biopharma.
- You make contributions or payments to political parties or candidates on behalf of Armis Biopharma.

4.2 Financial Integrity and Reporting

LIVING THE CODE

- Ensure transactions are properly authorized and recorded properly in a timely manner.
- Properly protect Company assets and compare asset records with actual assets regularly.
- Submit, or approve, only valid business expenses for reimbursement.
- Follow Corporate Financial Instructions to ensure accuracy and reliability of accounting records.
- Make accounting decisions based on accounting standards and Armis Biopharma policies.
- Do not make any false or unsupported statements or entries in the books and records of our Company or in any public disclosure, nor in any internal or external correspondence.

Armis Biopharma is committed to providing fair, accurate, and timely disclosure of financial information. Reporting of financial information requires the highest standard of honesty, accuracy and completeness.

The integrity of the Company's accounting and financial records is based on the accuracy and completeness of basic information supporting entries to the Company's books and records. Our internal controls are designed to provide reasonable assurance

regarding the effectiveness and efficiency of our operations, the reliability of our financial reporting, and our compliance with applicable laws and regulations. You should always assist in taking corrective actions in the case of a control failure, reporting any policies or



disclosures, important business developments (including regulatory approval or non-approval of one of our products), the acquisition or loss of a major customer or an important transaction.

4.5 Record Retention

We are committed to creating Company records that accurately and fairly present our activities and transactions, and then maintaining those records for so long as required by law or our record retention schedules.

As required by applicable laws, the Company has policies on the proper administration, maintenance, retention and destruction of records. Each of us is responsible for complying with those policies. This means that records must be kept by law or as required by our record retention schedules.

LIVING THE CODE

Some examples of Company records are:

- Agreements or Contracts
- Invoices
- Employment records
- Expense reports
- Laboratory notebooks
- Import/Export documentation
- Manufacturing and Production reports
- Quality records
- Research and development tests
- Requests by third parties (such as governmental agencies), lawsuits, or other inquiries.

4.6 Intellectual Property and Confidential Information

Some of our most valued assets are our intellectual property and confidential information. Protecting these assets is critical to our growth. This includes our patents, trade secrets, trademarks, copyrights, technical know-how, data, processes, experience, and general business knowledge. A few examples are sales and marketing databases, marketing strategies and plans, pricing information, manufacturing techniques, and research and technical data.

Every employee must protect our intellectual property and maintain the secrecy of our confidential information. Even after employees leave Armis Biopharma, they must continue to respect our intellectual property. Unauthorized use of the intellectual property or confidential information of others is also prohibited.



SECTION 5: COMMITMENT TO OUR HEALTHCARE PARTNERS

Armis Biopharma is committed to being a trusted, accountable, and resourceful advisor to our healthcare partners.

5.1 Interactions with Healthcare Professionals

All interactions with healthcare professionals should enhance the medical and scientific understanding of our products for our customers and their patients. Armis Biopharma educates healthcare professionals and healthcare providers about our products, collaborates on research, relies on healthcare professionals’ expertise as advisers, and initiates professional training on the use of our products to achieve this objective. Our interactions must always reflect our commitment to integrity, accuracy, and transparency while adhering to applicable laws and regulations and our Company values.

LIVING THE CODE

Some examples of appropriate behaviors whenever interacting with healthcare professionals are as follows:

- Engage healthcare professionals only when there is a bona fide need and always pay a fair fee consistent with our Fair Market Value policies and applicable state law.
- Provide appropriate instructions, education, and training on the safe and effective use of our products.
- Maintain transparency regarding all your interactions with healthcare professionals and providers, institutions, and other in the healthcare community.

Armis Biopharma places a high value on meaningful scientific exchange and integrity in scientific processes. Armis Biopharma prohibits business pressures from creating undue influence in any manner that could impugn collaborations with healthcare professionals that are intended to advance scientific and medical understanding, including the appropriate use of our products, the management of diseases, and patient care.

5.2 Industry Trade Associations’ Voluntary Codes of Conduct

As a company with complex business model that manufactures and promotes both medical devices and biopharmaceutical products, Armis Biopharma will adhere to both the PhRMA Code on Interactions with Healthcare Professionals (“PhRMA Code”) and the AdvaMed Code of Ethics on Interactions with Healthcare Professionals (“AdvaMed Code”). In scenarios where we are dealing with medical devices, Armis Biopharma will follow the PhRMA Code whereas in scenarios where we are dealing with biopharma products, Armis Biopharma will follow the AdvaMed Code of Ethics.



5.2.1 The PhRMA Code on Interactions with Healthcare Professionals

Armis Biopharma believes that the appropriate marketing of our products may ensure appropriate identification by healthcare professionals of patients who may benefit the most from Armis Biopharma products. Our relationships with healthcare professionals are critical to achieving these goals because they enable us to:

- Inform healthcare professionals about the benefits and risks to our products to help advance appropriate patient use;
- Provide scientific and educational information;
- Support medical research and education; and
- Obtain feedback and advice about our products through consultation with medical experts.

Armis Biopharma thus adopts the PhRMA code on Interactions with healthcare professionals, which guides our interactions with customers in an ethical manner.

5.2.2 The AdvaMed Code of Ethics on Interactions with Healthcare Professionals

As stated above, Armis Biopharma aims to serve the interests of patients through collaborations with healthcare professionals that advance medical technologies, enhance the safe and effective use of our products, and encourage research and education. Therefore, we expect ethical business practices and socially responsible conduct related to our interactions with healthcare professionals. To ensure appropriate transparency and in compliance with the applicable laws, regulations, and government guidance, Armis Biopharma has also adopted the AdvaMed Code of Ethics on Interactions with healthcare professionals.

SECTION 6: OUR COMMITMENT TO COMMUNITY

Armis Biopharma aims to act with integrity in our relationships with members of the healthcare community – patients, patient groups, healthcare providers, and healthcare regulators. Maintaining such integrity is critical to sustaining trust in our products and fulfilling our vision and mission.



6.1 Corporate Citizenship

Armis Biopharma is committed to supporting initiatives that improve our communities, provide better access to care for patients, and improve treatment outcomes. We support appropriate education for healthcare professionals and research that will advance scientific knowledge about our products and develop new products. Our grants, donations, and charitable contributions take the form of healthcare partnerships, community partnerships, and disaster relief, as well as support for non-profits and global initiatives. We fund high-quality educationally-appropriate and timely medical education. Our support for educational efforts is provided to those that advance fair, balanced, and independent content to healthcare professionals and which is delivered in accordance with applicable laws, regulations and relevant industry standards.

6.2 Government Inspections and Requests

LIVING THE CODE

- When responding to government inspections and requests:
 - Cooperate with and be courteous to government inspectors and coordinate with our quality, safety, and regulatory experts in response to regulatory inspections and requests.
 - Always provide regulators with honest, accurate, responsive, and timely information.
 - Be familiar with your site's procedures for complying with a request to access the premises.
 - Contact the Legal Department immediately in the event of a non-routine or legal inquiry, such as receiving a subpoena.

We operate in a complex and dynamic regulatory environment. Our facilities and activities are routinely inspected by healthcare and other regulators around the world., Armis Biopharma will cooperate with regulatory authorities at all times. Effective engagement with regulators is critical to our reputation and our ability to deliver safe, effective and high quality products.

In the event of a non-routine request for information or a facility visit, the Legal Department must be notified immediately. The Legal Department represents the Company on all legal matters and determines the appropriate information to be provided and will facilitate our cooperation with investigative authorities.



6.3 Government Pricing

Accurate and timely pricing information assists governments, private payors, healthcare professionals, patients, and other stakeholders. It is also important to Armis Biopharma’s commercial success and to meeting our regulatory requirements.

The laws in this area are complex and vary from country to country. The submission of inaccurate pricing information or fraudulent claims to a government could subject our Company to significant legal risks. We have a legal and ethical responsibility to provide transparent pricing information.

LIVING THE CODE

- Outside of the U.S., consult the Law Department for guidance on complying with pricing and price reporting regulations.
- In the U.S., ensure all government price calculations and reports that are your responsibility are timely and accurate.
- In the U.S., follow Armis Biopharma’s procedures for obtaining approval for, documenting, and communicating lawful discounts, rebates, and administrative fees.
- If you are involved in price calculation and reporting, participate in relevant training.

SECTION 7: INTERNATIONAL BUSINESS COMPLIANCE

As a company that operates in the global marketplace, Armis Biopharma is subject to numerous international laws, regulations and restrictions. We must understand our responsibility to know and comply with the legal and contractual requirements as they apply to our work in the countries in which we do business.

7.1 Anti-Bribery and Anti-Corruption Laws

Through our research and development, regulatory, manufacturing, and import/export and promotional activities, we may interact with government officials or entities that are state owned. Most countries forbid making, offering, or promising anything of value either directly or indirectly to a government official when the exchange is intended to influence an official act or a decision to obtain or retain an unfair business advantage. The U.S. Foreign Corrupt Practices Act (“FCPA”) and similar laws in other countries govern our interactions with government officials, including, but not limited to the UK Bribery Act, the Brazil Clean Company Act, France’s Sapin II, and many others.



LIVING THE CODE

- Do not make, offer, or promise anything of value, including cash, services, gifts, entertainment, or other business courtesies, in an attempt to influence a person’s actions, obtain a regulatory advantage, influence formulary status or enhance Armis Biopharma’s commercial interests.
- Business courtesies and gifts offered or received must be of modest value by local standards and may only be offered or received under circumstances that comply with Company policies and local law and industry codes.
- Maintain your knowledge and complete training on Company policies and global and local anti-bribery laws.

Many countries also have laws aimed at prohibiting commercial bribery. The U.S. Federal Anti-Kickback statute prohibits inducing someone to recommend or purchase a healthcare product or service covered by the U.S. federal healthcare program.

Payments, gifts, or services should not be given to government employees or healthcare providers that are intended to or appear to influence their actions. This includes “grease” or “facilitation” payments which may be presented to Armis Biopharma employees or our trusted business affiliates in a number of ways – some of which are subtle and may require

a careful evaluation by the General Counsel and Chief Compliance Officer. You must contact the Legal and Compliance Department immediately if you believe that you have been requested to pay a bribe or you know or suspect that others have or may have been approached with a request or demand to make improper payments to government officials.

7.2 Global Trade

Armis Biopharma recognize that our ability to conduct business internationally is a privilege, not a right, and that violations of import and export laws can significantly impact our operations. If you are involved in the movement of products, services, information, or technology across international borders, all Armis Biopharma employees must know and comply not only with U.S. trade laws, but also the trade laws and regulations associated with the countries with which you do business. Be aware that the laws of more than one country may apply in cross-border transactions. Please consult the Legal and Compliance Department with any questions you may have regarding the governing laws and regulations pertaining to our global trade initiatives.

SECTION 8: ADDITIONAL RESOURCES

Please see our “HR Policy Manual” for more information.