



# Renrejix

Driven by Science, Dedicated to People

Code Of Business Conduct  
And Ethics

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## OUR CODE

### All About the Code

The Renejix team is an extraordinary force - diverse in our talents and perspectives, but also united in our drive to benefit patients in need.

The fight against debilitating diseases is fast-paced, and the rules are constantly changing, but at Renejix we are determined to innovate and always stay ahead of the curve. Patients are at the center of all that we do and are the key driving force behind our relentless passion and focus.

With patients always in mind, we stay focused on our mission to develop and commercialize safe, effective, and transformative treatment options. We expect every member of the Renejix team to share this focus and understand that our success is not only about the results we get - it is about the way we achieve them - with integrity in every action and an unwavering commitment to patients.

Our Code of Business Conduct and Ethics (“Code”) is a key resource in this effort. It is designed with you in mind - a vital resource that will help you:

- › Comply with Company policies, applicable laws, and regulations.
- › Promote integrity and the highest standards of ethical conduct.
- › Address common ethical situations you could encounter in your work.
- › Avoid even the appearance or perception of anything improper in connection with your activities.

### Who Must Follow the Code

All employees of Renejix, LLC. and its subsidiaries, including corporate officers and members of our Board of Directors, are required to read, understand and follow our Code. Business partners, such as suppliers or vendors, consultants, and temporary employees who serve as an extension of Renejix, or certify on our behalf, are also expected to follow the spirit of our Code, as well as any applicable contractual provisions. Any waiver of this Code may be made only by the Board of Directors or a committee of the Board, and will be promptly disclosed to shareholders as required by applicable laws, rules, and regulations.

Also keep in mind that Renejix is committed to being compliant with all laws, rules, and regulations that apply to our business, so it is important that you are aware of the laws and customs that apply in the countries where we operate. If any provision of our Code conflicts with a local law or requirement, or if you are not sure what the rules are in your particular country, you should seek guidance from Human Resources, Legal, or Compliance.

This Code is not intended to be a comprehensive rulebook, and it is impossible to anticipate every question that you may have. In addition to the Code, Renejix has other resources that can be of help. These additional resources are listed throughout the Code.

# OUR CODE

## Our Responsibilities

Each of us must take responsibility for acting with integrity, even when this means making difficult choices. It is our integrity and meeting our responsibilities which enable us to succeed and grow.

### Employee Responsibilities

- › Always act in a professional, honest, and ethical manner when carrying out your duties.
- › Know the information in the Code, Company policies and procedures, and pay particular attention to the topics that apply to your specific job responsibilities.
- › Complete all required employee training in a timely manner and keep current on applicable standards and expectations.
- › Report concerns about possible violations of our Code, our policies or the law to your manager, Human Resources, Compliance, or Legal. You can also contact the Renejix Hotline.
- › Cooperate in any investigation or audit, and never alter or destroy records in response to an investigation or when an investigation is anticipated.

***Remember: No reason, including the desire to meet business goals, should ever be an excuse for violating our Code, our policies, the law, or for putting patient safety at risk.***

## Additional Responsibilities of Supervisors

- › Lead by example. As a manager, you are expected to exemplify high standards of ethical business conduct.
- › Respectful environment. Help create a work environment that values mutual respect and open communication.
- › Be a resource for others. Be available to communicate with employees, contractors, suppliers, and other business partners about how the Code and other policies apply to their daily work.
- › Be proactive. Look for opportunities to discuss and address ethics and challenging situations with others.
- › Respond quickly and effectively. When a concern is brought to your attention, ensure that it is treated seriously and with due respect for everyone involved.
- › Be aware of the limits of your authority. Do not take any action that exceeds your authority. If you are ever unsure of what is appropriate (and what isn't), discuss the matter with your manager.
- › Delegate responsibly. Never delegate authority to any individual whom you believe may engage in unlawful conduct or unethical activities.

## OUR CODE

### How to Make Good Decisions

Making the right decision is not always easy. There may be times when you will be under pressure or unsure of what to do. Always remember that when you have a tough choice to make, you are not alone. There are resources available to help you.

### Facing a Difficult Decision?

It may help to ask yourself:

Is it legal?

Is it consistent with our Code and our values?

Would I feel comfortable if senior management and others within my Company knew about it?

Would I feel comfortable if my decision or my actions were made public?

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If the answer to all of these questions is “**yes**” the decision to move forward is probably OK, but if the answer to any question is “**no**” or “**I’m not sure,**” stop and seek guidance.

*Remember, in any situation, under any circumstances, you should always feel comfortable to ask for help or guidance.*

#### ONE MORE THING ...

We value your feedback. If you have suggestions for ways to improve our Code, our policies, or our procedures to better address a particular issue you have encountered, bring them forward. We all have a responsibility to do the right thing.





## OUR CODE

### Our Non-retaliation Policy

We will not tolerate retaliation against any employee who, in good faith, asks questions, makes a report of actions that may be inconsistent with our Code, our policies or the law or who assists in an investigation of suspected wrongdoing.

Reporting “in good faith” means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken.

### Accountability and Discipline

Violating our Code, our policies, or the law or encouraging others to do so, not only exposes Renejix to liability and puts our reputation at risk, but can have additional consequences for you. If an ethics or compliance problem does occur, you are required to report it so that an effective solution can be developed. You should also understand that violations of laws or regulations may result in legal proceedings and penalties including, in some circumstances, criminal prosecution.



## OUR WORKPLACE

### Diversity, Inclusion, Equal Opportunity, and Non-discrimination

Renejix is committed to cultivating a diverse and inclusive environment that brings together employees with a wide variety of backgrounds, skills, and cultures. Combining a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results.

Our colleagues, job applicants, and business partners are entitled to respect and should be judged on the basis of their qualifications, demonstrated skills, actions, and achievements.

We provide equal employment opportunity for all and support laws prohibiting discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, or related medical conditions), gender identity, gender expression, national origin, ancestry, ethnicity, citizenship, age, physical or mental disability, transgender status, military or veteran status, marital status, domestic partner status, sexual orientation, genetic information, or any other basis protected by applicable local, state, or federal laws.

### Do the Right Thing

- › Treat others respectfully and professionally.
- › Promote diversity in hiring and other employment decisions.
- › Champion equity, diversity, and inclusion at all levels of the Company.
- › Do not discriminate against others on the basis of any other characteristic protected by law or Company policy.

### Be Aware Of

- › Comments, jokes, or materials, including in emails and on messaging applications, which others might consider offensive.
- › Inappropriate bias when judging others. If you supervise others, judge them on performance. Avoid introducing unrelated considerations into your decisions. Use objective, quantifiable standards.



### Consider This

One of my coworkers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

You should notify your manager, Human Resources, Compliance, Legal, or the Renejix Hotline. Sending these kinds of jokes violates our values as well as our policies that relate to the use of email and our standards on diversity, harassment, and discrimination. By doing nothing you may be condoning discrimination and tolerating beliefs that can seriously erode the team environment that we have all worked to create.

## OUR WORKPLACE

### Harassment-free Workplace

We all have the right to work in an environment that is free from intimidation, harassment, and abuse.

Verbal or physical conduct by any employee that harasses another, disrupts another's work performance or creates an intimidating, offensive, abusive, or hostile work environment will not be tolerated.

#### *At Renejix, We Do Not Tolerate:*

- Threatening remarks, obscene phone calls, stalking, or any other form of harassment.
- Intentionally damaging someone else's property or acting aggressively in a manner that causes someone else to fear injury.
- Threatening, intimidating, or coercing others on or off the premises - at any time, for any purpose.

#### *Sexual Harassment*

A common form of harassment is sexual harassment, which in general can occur when:

- Actions that are unwelcome are made a condition of employment or used as the basis for employment decisions such as a request for a date, a sexual favor, or other similar conduct of a sexual nature.
- An intimidating, offensive, or hostile work environment is created by unwelcome sexual advances, insulting jokes, or other offensive verbal or physical behavior of a sexual nature.

### Do the Right Thing

- › Help each other by speaking out when a coworker's conduct makes others uncomfortable.
- › Never tolerate sexual harassment including requests for sexual favors, or other unwelcome verbal or physical conduct of a sexual nature.
- › Demonstrate professionalism. Do not visit inappropriate internet sites or display sexually explicit or offensive pictures.
- › Promote a positive attitude toward policies designed to build a safe, ethical, and professional workplace.
- › Report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.

### Be Aware Of

- › Unwelcome remarks, gestures, or physical contact.
- › The display of sexually explicit or offensive pictures or other materials.
- › Sexual or offensive jokes or comments (explicit or by innuendo) and leering.
- › Verbal abuse, threats, or taunting.



## OUR WORKPLACE



### Consider This

While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked them to stop, but they would not. We were not in the office and it was after regular working hours, so I was not sure what I should do. Is it harassment?

Yes, it is. This type of conduct is not tolerated, not only during working hours but in all work-related situations, including business trips. Tell your colleague such actions are inappropriate and must be stopped, and if they continue, report the problem to your manager, Human Resources, or the Renejix Hotline.



[Renejix Employee Handbook](#)

## Health and Safety at Work

Ensuring safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others.

We can only achieve our goal of a safe and healthy workplace through the active participation and support of everyone. Situations that may pose a health, safety, or environmental hazard should be reported immediately. All reports can be made without fear of reprisal.

Safety is a condition of employment, and we expect the commitment of each director, officer, and employee to make Renejix an accident-free workplace.

### *Alcohol and Drugs*

While at work or on Company business:

- You should always be ready to carry out your work duties - never impaired.
- Do not use, possess, or be under the influence of illegal drugs or any substance that could interfere with a safe and effective work environment or harm our Company's reputation.
- Possessing, using, selling, or offering illegal drugs and other controlled substances is prohibited under all circumstances while on duty or on the premises of the Company.
- You are prohibited from reporting for work, or driving a Company vehicle or any vehicle on Company business, while under the influence of alcohol or any illegal drug or controlled substance.

## OUR WORKPLACE

### ***Workplace Violence***

Violence of any kind has no place at Renejix. We will not tolerate:

- Intimidating, threatening, or hostile behavior.
- Causing physical injury to another.
- Acts of vandalism, arson, sabotage, or other criminal activities.
- The carrying of weapons onto Company property unless you are authorized to do so.
- Possession of a firearm, explosive, or other dangerous weapon on Renejix premises or use of an object as a weapon.
- Inflicting or threatening injury or damage to another person's life, health, well-being, family, or property.

### **Do the Right Thing**

- › Follow the safety, security, and health rules and practices that apply to your job.
- › Notify your manager immediately about any unsafe equipment, or any situation that could pose a threat to health or safety or damage the environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- › Maintain a neat, safe working environment by keeping workstations, aisles, and other workspaces free from obstacles, wires, and other potential hazards.

### **Be Aware Of**

- › Unsafe practices or work conditions.
- › Carelessness in enforcing security standards, such as facility entry procedures and password protocols.



### **Consider This**

I have noticed some practices in my area that do not seem safe. Who can I speak to? I am new here and do not want to be considered a troublemaker.

Discuss your concerns with your manager, Environmental, Health & Safety (EH&S), Human Resources, or the Renejix Hotline. There may be very good reasons for the practices, but it is important to remember that raising a potential safety concern is important.



[Renejix Employee Handbook](#)

# OUR COMPANY

## Our Company Assets

We are entrusted with Company assets and are personally responsible for protecting them and using them with care. Company assets include funds, facilities, equipment, information systems, intellectual property, and confidential information.

You must use these Company assets primarily to further Renejix's business and not for personal gain or non-business related activities; however, as outlined in our Employee Handbook, the Company recognizes that limited personal use of these assets may be permissible.

## Do the Right Thing

- › Do not use Renejix equipment or information systems to create, store, or send content that others might find offensive.
- › Do not share passwords or allow other people, including friends and family, to use Renejix resources.
- › Only use software that has been properly licensed. The copying or use of unlicensed or "pirated" software on Company computers or other equipment to conduct Company business is strictly prohibited. All software installed on a Company computer must be pre-approved by the IT Department. If you have any questions about whether or not a particular use of software is licensed or whether specific software can be used, contact the [IT Department](#).

- › Requests to borrow or use Renejix equipment without approval.
- › Excessive use of Renejix resources for personal purposes.
- › Strange or unknown emails.
- › Strange or unknown phone calls.



[Renejix Employee Handbook](#)

## OUR COMPANY

### Confidential Information and Intellectual Property

As Renejix employees, we are bound by our duty to protect Renejix sensitive information not only because of our agreements with the Company, but also because it is the right thing to do. We have access to non-public information related to our business, including confidential information about research and development projects, manufacturing methods, business plans, financial data, marketing and sales strategies, launch of new products, asset acquisitions, or licensing activities.

Confidential information should be treated as a valuable Company asset. Each of us must be vigilant and protect confidential information, whether it belongs to Renejix or to our customers, business partners, or others. This means keeping it secure, limiting access to those who have a need to know in order to do their job, and only using it for authorized purposes.

If there is a legitimate reason to share confidential information with a third party, it must be done by way of a contract that ensures the third party takes appropriate measures to protect and not misuse our confidential information.

We respect the confidential information belonging to third parties and must take appropriate measures to protect and not misuse such information.

We have to be aware that in a competitive environment, third parties strive to get access to confidential information related to our business. Competitive intelligence activities by third parties are part of our industry. Therefore, we must be extremely careful how we handle confidential information in public places, such as airplanes, trains, subways, bars, restaurants, social media, and non-approved communication tools.

Renejix commits substantial resources to the innovation and development of products and technology. The creation and protection of our intellectual property rights are critical to our business. Renejix's intellectual property includes its patents, trade secrets, trademarks, and copyrights, as well as scientific and technical knowledge, know-how and experience developed in the course of Renejix's activities. We are all expected to support the establishment, protection, maintenance, and defense of Renejix's intellectual property rights and to use those rights in a responsible way.

Importantly, the value of our intellectual property can be lost by improper disclosure or use, inappropriate contractual terms, or failing to follow necessary formalities for protection, such as registration. For example, if certain intellectual property is revealed to the public or disseminated without the appropriate registrations or contractual protections in place, it can prevent the possibility of obtaining suitable protection of the intellectual property and a loss of rights.



## OUR COMPANY

We must also respect the confidential information and intellectual property of others. Unauthorized use, theft, or misappropriation of third-party confidential information or intellectual property may result in significant fines, lawsuits, injunctions, or criminal penalties for the Company and you. Please contact the Legal Department if you have any questions or concerns.

Be aware that the obligation to restrict your use of Renejix confidential information and intellectual property continues even after employment ends as outlined in your agreement with the Company.



### *Intellectual Property*

Intellectual property (IP) is an important asset that must be protected. Examples of our IP include:

- Patents
- Trade Secrets
- Trademarks
- Service Marks
- Copyrights
- Graphics, Logos, and Slogans
- Domain Names
- Know-how, Source Code, and Developed Technology

Contact the Legal Department if you receive any statements or questions from third parties regarding (1) the scope of Renejix intellectual property rights, (2) the applicability of Renejix rights to another company's products, or (3) the applicability of a third party's intellectual property rights to Renejix intellectual property rights or products.

Promptly disclose to Company management any inventions or other IP that you create while you are employed by Renejix.



## OUR COMPANY

### Do the Right Thing

- › Properly label non-public information as “confidential information” to indicate how it should be handled, distributed, and destroyed.
- › Use and disclose confidential information only for legitimate business purposes.
- › Protect our intellectual property and confidential information by sharing it only with authorized parties who have a need to know such information, who are entitled to receive it and are contractually obligated to protect our rights.
- › Only store or communicate Company information using Renejix information systems.
- › Understand the expectations of customers and business partners regarding the protection, use, and disclosure of the confidential information that they provide to us.
- › Limit any access to third-party confidential information to those persons who have a need to know in order to do their job, and only for authorized purposes.
- › Immediately report any loss or theft of confidential information to your manager.

### Be Aware Of

- › Discussions of Renejix confidential information in places where others might be able to overhear - for example on planes and elevators and when using mobile phones.
- › Sending confidential information to unattended fax machines or printers.

### Cooperation with Investigations and Audits

All employees are expected to fully cooperate with internal and external investigations and audits that are conducted by our Company. In addition, in the course of business, you may receive inquiries or requests from government officials.

You are expected to cooperate fully and ensure that any information you provide is true, accurate, not misleading, and complete. If you learn of a potential government investigation or inquiry, immediately notify your manager and the Legal Department before taking or promising any action.

### Be Aware Of

- › **Falsified information.** Never destroy, alter, or conceal any document in anticipation of or in response to a request for these documents.
- › **Unlawful influence.** Never provide or attempt to influence others to provide incomplete, false, or misleading statements to a Company or government investigator.



Policy on Compliance Violation Reporting and Non-Retaliation

# OUR COMPANY

## Conflicts of Interest

A conflict of interest can occur whenever you have a competing interest that may interfere with your ability to make an objective decision on behalf of Renejix. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, which can undermine the trust others place in us and damage our reputation.

Conflicts of interest may be actual, potential, or even just a matter of perception. Since these situations are not always clear-cut, you need to fully disclose them to your manager so that we can properly evaluate, monitor, and manage them.

## Do the Right Thing

- › Avoid conflict of interest situations whenever possible.
- › Always make business decisions in the best interest of Renejix.
- › Discuss with your manager full details of any situation that could be perceived as a potential conflict of interest.
- › Think ahead and proactively address situations that may put your interests or those of a family member in potential conflict with Renejix.

Be aware of situations, including the following, which are common examples of potential conflicts of interest:

### Corporate opportunities

If you learn about a business opportunity because of your job, it belongs to Renejix first. This means that you should not take that opportunity for yourself unless you get approval from Human Resources or Compliance.

### Friends and relatives

On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a customer, supplier, or competitor. Since it is impossible to anticipate all situations that may create a potential conflict, you should disclose your situation to your manager in order to determine if any precautions need to be taken prior to an engagement.

### Outside employment

To ensure that there are no conflicts and that potential issues are addressed, you always need to disclose and discuss outside employment (including consulting positions) with your manager and Legal. If approved, you must ensure that the outside activity does not interfere with your work at Renejix. Working for a competitor, supplier, or customer may raise conflicts that will need to be resolved. Also, any approved side or personal business should not compete with Renejix or use Renejix resources.

### Personal investments

A conflict can occur if you have a significant ownership or other financial interest in a competitor, vendor, supplier, or customer. Make sure you know what is permitted - and what is not - by our policies and seek help with any questions prior to making a personal investment that might result in a conflict.

### Boards and advisory positions

Unless Company management specifically asks you to do so, you should not accept a seat on the board of directors or advisory board of any of our competitors, suppliers, customers, or partners, especially if your current job gives you the ability to influence our relationship with them.

# OUR COMPANY

## Gifts and Entertainment

A modest gift provided by a vendor may be a thoughtful “thank you,” or a meal may be an appropriate setting for a business discussion. If not handled carefully, however, the exchange of gifts and entertainment may appear to create a conflict of interest or other misconduct. This is especially true if it happens frequently, or if the value is large enough that someone may think it can improperly influence a business decision. Proper records of such expenses must also be created and maintained.

We do not accept or provide gifts, favors, or entertainment - even if it complies with our policies - if the intent is to improperly influence any decision. Additionally, we do not provide gifts or entertainment, directly or indirectly, to any healthcare professionals or government officials, regardless of the circumstances.

## Do the Right Thing

- › Only provide and accept gifts and entertainment that are reasonable complements to business relationships.
- › Exchange gifts and entertainment that foster goodwill in business relationships, but never provide or accept gifts or entertainment that obligate or appear to obligate the recipient.
- › Never accept gifts of any kind from a business partner with whom you are involved in contract negotiations or while conducting a request for proposal (RFP).
- › Understand and comply with the policies of the recipient’s organization before offering or providing gifts, favors, or entertainment.
- › Never accept cash or cash equivalents.
- › Never provide gifts or entertainment to any healthcare professionals or government officials.

- › Do not request or solicit personal gifts, favors, entertainment, or services.
- › Raise a concern whenever you suspect that a colleague, third party or other agent of the Company may be engaged in any attempt to improperly influence a decision of a customer or government official.

## Be Aware Of

- › Situations that could embarrass you or our Company. Ask yourself, if this was made public would it be deemed inappropriate.
- › Understand who you are engaging and all of their affiliations (e.g., someone who works for a Veteran’s Affairs Hospital can not only be considered a healthcare professional, but also a government official).



## Consider This

When traveling, I received a gift from a business partner that I believe was excessive. What should I do?

You need to let your manager and Compliance know as soon as possible. We may need to return the gift with a letter explaining our policy.

# OUR COMPANY

## Responsible Communications

We are committed to providing clear and consistent internal and public communications in an honest, professional, and lawful manner.

For this reason, it is important that only authorized and approved persons speak on behalf of Renejix when making material disclosures or providing information to the public. Inquiries or communications with media, investors, stock analysts, and other members of the financial community should be referred to Investor Relations and Corporate Communications.

### *Accurate Disclosures*

As a public company, Renejix is committed to meeting its legal obligations of full, fair, accurate, timely, and complete disclosure in reports and documents that describe our business and financial results, including in Securities and Exchange Commission filings and submissions, and other public communications.

### *Social Media*

If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites, or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of Renejix.

If you believe a false statement about our Company or our products has been posted, do not post or share non-public information, even if your intent is to “set the record straight.” Your posting might be misinterpreted, start false rumors, or may be inaccurate or misleading. Instead, contact Compliance, Legal, or Corporate Communications.

## Be Aware Of

- › Presenting at conferences, writing articles for professional journals, or other public communications that relate to Renejix, or work being done at Renejix without management approval.
- › The temptation to use your title or affiliation outside of your work for Renejix without it being clear that the use is for identification only.
- › Invitations to speak “off the record” to journalists or analysts who ask you for information about Renejix or its customers or business partners. Only approved Renejix representatives can speak on behalf of the Company.



# OUR RESPONSIBILITIES TO OTHERS

## Ethical Interactions

We put patients first. In our interactions with healthcare professionals, we promote patient welfare by observing good business practices, meeting industry standards and complying with Renejix policies. We communicate with healthcare professionals, patients, and the public in a fair and balanced way.

### *Healthcare Professionals*

We comply with federal and state laws that govern our relationships with healthcare professionals, including the U.S. Anti-kickback Statute and transparency regulations. Make sure that any interactions are professional and serve a legitimate business purpose, and never engage in any conduct that is intended to - or could even suggest the appearance of - improperly influencing a healthcare professional's decision.

### *Patients, Caregivers, and Patient Advocacy Groups*

At Renejix, we put patients at the center of everything we do and their privacy, health, and safety are paramount. We respect the relationships that patients and their caregivers have with healthcare professionals and do not interfere in it. All interaction with patients and caregivers must be based in transparency and respecting the value which they bring to the clinical development process. When communicating with them, we provide accurate, fair, and balanced information about our products and the diseases they treat or prevent. We respect that patient advocacy groups are independent and have their own mission and objectives. Our interactions with patient advocacy groups are based on mutual respect and ethical standards. All interactions with patients, caregivers, and patient advocacy groups are conducted in a respectful and appropriate manner that is consistent with applicable laws and regulations.

### *Suppliers and Vendors*

Renejix evaluates and engages with qualified suppliers (including vendors) on an objective basis. When selecting suppliers, we assess each supplier's ability to satisfy our business and technical needs and requirements. We also make purchasing decisions based on the cost and benefit to Renejix. All agreements must be negotiated in good faith.





## OUR RESPONSIBILITIES TO OTHERS

### Do the Right Thing

- › Never pay or offer to pay anyone, including colleagues, physicians, or any other provider to refer a patient. If you are offered any kind of payment for a patient referral, turn it down.
- › Do not offer or give anything of value to influence or reward prescribing, using, purchasing, leasing, or recommending certain products or services.

### Be Aware Of

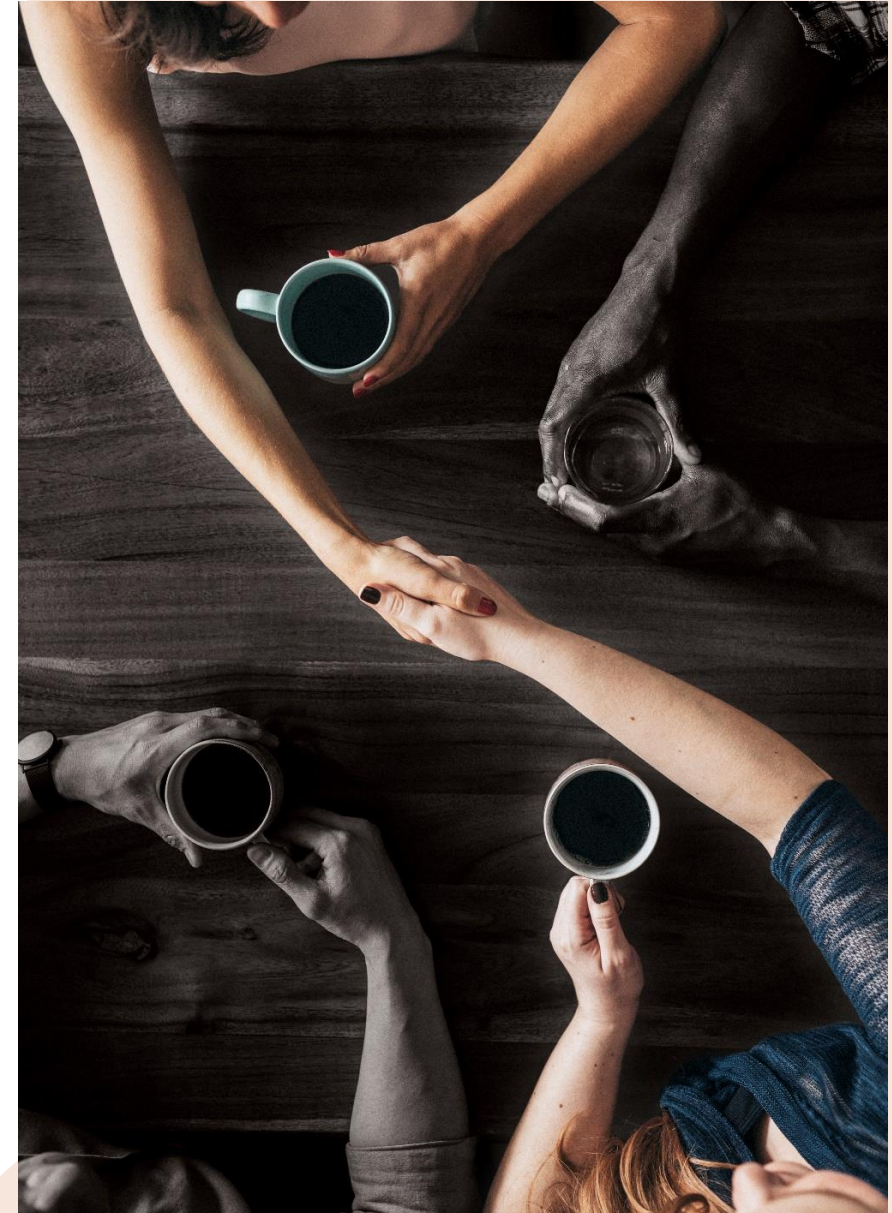
- › Requests for improper remuneration or gifts. We provide compensation for services provided in connection with legitimate business needs and do not provide gifts to any healthcare professionals.
- › Improper influence - do not interfere with a healthcare professional's independent judgment.



Policy on Interactions with Healthcare Professionals



Policy on Interactions with Patients and Patient Advocacy Groups



# OUR RESPONSIBILITIES TO OTHERS

## Data Privacy

We respect the personal information of others. Follow our policies, all applicable laws, and regulations in collecting, accessing, using, storing, sharing, and disposing of sensitive personal information. In addition, only use it - and share it with others outside of Renejix - for legitimate business purposes and when we have consent, if applicable.

Make sure you know the kind of information that is considered personal information. It includes anything that could be used to identify someone or a household, either directly or indirectly, such as a name, email address, phone number, credit card number, banking information, health information, employee identification, or other employment information.

### *Privacy*

Renejix complies with all applicable privacy laws which protect the privacy of personally identifiable information (PII) and protected health information (PHI). We collect only the minimum PHI or PII needed to perform our work and use it only for legitimate business purposes.

- PII is information that can be used to trace someone's identity or can be combined with other personal information to do so (for example, a name, address, social security number, driver's license number, or account number).
- PHI is a specific type of personal information that identifies an individual and relates to a person's physical or mental health, treatment, or payment for health care.

## Be Aware Of

- › Sending sensitive information to unattended fax machines or printers.
- › Failing to shred or securely dispose of sensitive information.
- › Receiving PHI and the proper disposal of it.

## Animal Testing

We are dedicated to the ethical and responsible treatment of all animals used in the development of our products. We work to replace the use of live animals, reduce the number of animals used, and refine our procedures to minimize distress, whenever scientifically valid and acceptable to regulators. We also expect our suppliers to comply with all of the applicable laws and regulations that we do when they conduct animal-based research on our behalf.



# OUR RESPONSIBILITIES TO OTHERS

## Fraud, Waste, and Abuse

Renejix is committed to the integrity of the healthcare system and to detecting, correcting, and preventing false claims. As part of this commitment, we expect our employees to be able to recognize and report instances of fraud, waste, and abuse.

Each of us has a responsibility to ensure payments and transactions are properly authorized and fully and accurately recorded in compliance with all applicable laws and Renejix policies.

## Do the Right Thing

- › Ensure timely and accurate documentation, coding, and billing that reflect services ordered and actually performed.
- › Only bill for goods and services we actually provide.
- › Only approve vendor invoices for services actually provided.
- › Ensure expense reports are submitted in a timely manner, are accurate, and reflect true business expenses.
- › Promptly report any instances of suspected fraud, waste, or abuse.

## Be Aware Of

- › Activities that constitute fraud, waste, or abuse, such as:
  - Billing for services, procedures, or supplies that have not actually been provided.
  - Providing services to patients that are not medically necessary.
  - Forging a physician's signature to obtain pharmaceuticals.
  - Intentionally misrepresenting or manipulating information to receive payment for services that were not provided.
  - Lack of supporting documentation, where it is required.





# OUR RESPONSIBILITIES TO OTHERS

## Research and Development

Clinical and preclinical research and development is a critical component of healthcare delivery and is at the heart of all medical advances. The research and development we conduct at Renejix is not only scientifically and medically beneficial, but also upholds the ethical principles of human subject research.

Any research and development we conduct at Renejix must be approved in advance by the appropriate Renejix oversight committee, and participant enrollment in any research study (or clinical trial) must be voluntary.

### *Research and Development Misconduct*

Renejix will not tolerate research and development misconduct of any kind. That includes:

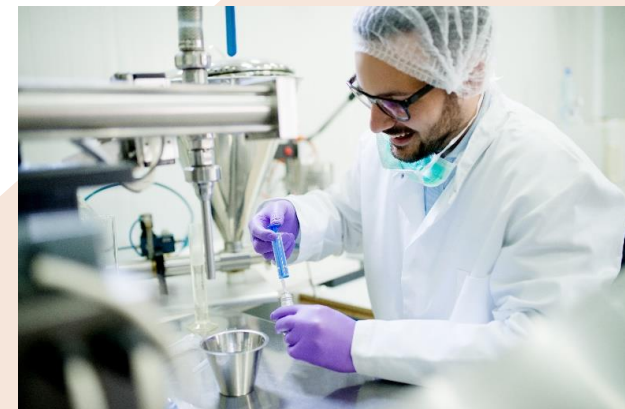
- **Fabrication** - making up data or results and recording or reporting the fabricated information.
- **Falsification** - manipulating research materials, equipment, or processes or changing or omitting data or results to misrepresent the research.
- **Plagiarism** - using another person's ideas, processes, results, or words without giving appropriate credit.

## Do the Right Thing

- › Review and follow all policies and procedures regarding the proposal, approval, conduct, and reporting of research and development.
- › Honor the terms of research and development funding that we receive. Make sure those funds are used responsibly - that any use is necessary, reasonable, authorized, and well-documented.
- › Direct any research/development-related questions (that your team cannot answer) to the [Medical Information Department](#).

## Be Aware Of

- › Situations that could lead to conflicts. Avoid any relationship or activity that could influence or appear to influence your ability to protect research participants or compromise the validity of research or development results.
- › Possible misconduct.



# OUR RESPONSIBILITIES TO OTHERS



## Consider This

While reviewing a presentation for a medical conference, I noticed some of the safety information was missing. Is this misconduct?

Potentially. If the safety information was omitted on purpose, then it would be considered misconduct as it would be a falsification of the data. As a reviewer, it is important to highlight this and ensure we are including all appropriate data relating to our research.



## Detection of Fraud and Misconduct





# OUR RESPONSIBILITIES TO OTHERS

## Ethical Marketing and Advertising

Renejix’s advertising and promotion efforts focus on conveying useful information to healthcare professionals, patients, and customers. We only promote our pharmaceutical products for uses that have been approved or authorized by appropriate government or regulatory agencies, (e.g., we do not promote in the United States a use that has been approved by another country’s government but not the U.S. government). Our product claims are grounded in scientific evidence, accepted medical practice, and government-approved labeling rules in all countries where we operate. All materials used in advertising and promotion must undergo internal review and approval to ensure compliance with applicable regulations.



## Adverse Events

We have an obligation to report any issue that could compromise the quality or safety of the products or services we provide to healthcare professionals or patients.

If you see, suspect, or become aware of a situation that is unsafe (e.g., an adverse event occurring in a patient taking one of our products), does not comply with Renejix quality policies or procedures, or could adversely affect any of our products, you have a responsibility to [report](#) it within 24 hours of awareness. By acting quickly, you help us to address and correct the issue before it presents a risk to those we serve.



# OUR RESPONSIBILITIES TO OTHERS

## Product Safety and Quality

We develop our products with patient communities in mind and are dedicated to ensuring patient safety is a top priority, so they receive safe, high-quality products and therapies. Our commitment to safety and quality has allowed us to earn the trust of patients and physicians.

### *How We Inspire Trust*

We deliver on our promises and ensure that we meet the highest standards by:

- Innovating our processes and operations everywhere we do business.
- Following the most stringent guidelines applicable.
- Testing our products to ensure that only those of the highest quality reach the market.
- Evaluating the performance of our products throughout their life to ensure quality and reliability.

## Do the Right Thing

- › Help Renejix continue producing quality products by always making patient safety a priority, adhering to the highest standards, and never sacrificing quality to meet a Company target or deadline.
- › If you see or suspect activity that goes against our commitment, speak up by raising it to your manager, Quality, Compliance, or the Renejix Hotline.



## Consider This

I think there may be an issue with one of the manufacturing processes at our third-party contract manufacturing organization, but they are behind schedule and if I say anything, they will be delayed further as the Company investigates. What should I do?

Renejix never sacrifices quality to meet a deadline or target. You should report the matter immediately to your manager.

# OUR COMMITMENT TO DO THE RIGHT THING

## Compliance with Healthcare Laws/Regulations

We comply with all applicable laws that regulate our business. Violations of these laws and their accompanying regulations can have significant impacts on the Company. These laws include:

- › **U.S. Anti-kickback Statute.** We do not give anything of value to induce a healthcare professional to use or recommend pharmaceutical products that are paid for or reimbursed by the government. It is never acceptable to try and influence purchasing decisions in any way that is unethical, inappropriate, or illegal, or creates a potential conflict of interest.
- › **U.S. False Claims Act** and similar laws in other countries where the Company does business. We do not submit or cause the submission of false claims for healthcare reimbursement to the government.



- › **Federal Food, Drug, and Cosmetic Act** and its implementing regulations and similar laws in other countries where the Company does business. Our products, product candidates and operations are subject to extensive and rigorous regulation including with respect to the development, design, non-clinical and clinical research, manufacturing, safety, efficacy, labeling, packaging, storage, recordkeeping, premarket clearance or approval, adverse event reporting, advertising, promotion, marketing, sale and distribution of our product candidates and products.
- › **Transparency laws.** We report certain transfers of value to healthcare professionals, healthcare organizations, and patient groups as required by transparency laws and regulations.
- › **U.S. Foreign Corrupt Practices Act**, the UK Bribery Act, and similar laws in other countries where the Company does business. We do not participate in bribery or corruption and adhere to all local laws and regulations that cover bribery and corruption.

## Do the Right Thing

- › Understand how these laws apply to your job and ask for guidance from Legal if you are ever unsure of the proper course of action.
- › If you are in a situation outside the United States where local regulations, rules, or laws seem to conflict with our Code or applicable U.S. regulations, consult your manager or get guidance from Compliance or Legal.

# OUR COMMITMENT TO DO THE RIGHT THING

## Financial Integrity

The accuracy and completeness of our disclosures and business records are essential to making informed decisions and to supporting investors, regulators, and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some employees have special responsibilities in this area. If you are involved in any aspect of our financial reporting, make sure you meet all applicable procedural and legal requirements. Take care to ensure disclosures in reports and other documents that describe our financial reports are full, fair, accurate, and timely and to never falsify or mischaracterize any book, record, account, entry, or transaction that relates to Renejix.

## *Records Management*

Documents should only be disposed of in compliance with Renejix policies and should never be destroyed or hidden. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to - or in anticipation of - an investigation or audit.

If you have any questions or concerns about retaining or destroying corporate records, please contact the Legal Department.

Remember, everyone at Renejix contributes to the process of recording business results and maintaining records. Whether you are estimating the cost of services provided, filing an expense report, preparing a financial statement or simply completing a time sheet, be honest, accurate, and complete.

# OUR COMMITMENT TO DO THE RIGHT THING

## Do the Right Thing

- › Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.
- › Write carefully in all of your business communications. Write as though someday the records you create may become public documents.

## Be Aware Of

- › Records that are not clear, accurate, and complete or that obscure the true nature of any action.
- › Undisclosed or unrecorded funds, assets, or liabilities.
- › Improper destruction of documents.



## Consider This

At the end of the last quarter reporting period, my manager asked me to record additional expenses, even though the work has not yet started. I agreed to do it, since the work was budgeted for this quarter, and we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.

No, you did not. Costs must be recorded in the period in which they are incurred. The work was not started and the costs were not incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could amount to fraud.



# OUR COMMITMENT TO DO THE RIGHT THING

## Bribery and Corruption

We believe that all forms of bribery and other corrupt practices, including facilitation payments, are an inappropriate way to conduct business regardless of local customs. Renejix is committed to complying with all applicable anti-corruption laws.

We do not pay or accept bribes or kickbacks at any time for any reason. This applies equally to any person or firm who represents Renejix.

### *Key Definitions - Bribery, Corruption, and Facilitation Payments*

**Bribery** means giving or receiving anything of value (or offering to do so) in order to obtain a business, financial, or commercial advantage.

**Corruption** is the abuse of an entrusted power for private gain.

**Facilitation payments** are typically small payments to a low-level government official that are intended to encourage the official to perform his or her responsibilities.

It is especially important that we exercise due diligence and carefully monitor third parties acting on our behalf. We carefully screen all third parties, including suppliers, consultants, and vendors who work on our Company's behalf, particularly when dealing in countries with high corruption rates and in any situations where "red flags" would indicate further screening is needed before retaining the third party. Third parties must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions.

## Do the Right Thing

- › Never give anything of value inconsistent with applicable laws and regulations to any government official. If you are not sure of the applicable laws, the safest course of action is to not give anything of value, including any hospitality.
- › Understand the standards set forth under anti-bribery laws which apply to your role at Renejix.
- › Accurately and completely record all payments to third parties.

## Be Aware Of

- › Apparent violations of anti-bribery laws by our business partners.
- › Agents who do not wish to have all terms of their engagement with Renejix clearly documented in writing.
- › Agents or government officials who require facilitation payments or access fees.
- › The fact that in many countries outside of the United States, health-care professionals are considered government officials. If you have questions or do not know if they would be considered as government officials, contact Compliance or Legal.

# OUR COMMITMENT TO DO THE RIGHT THING



## Consider This

I work with a foreign agent in connection with our operations in another country. I suspect that some of the money we pay him goes toward making payments or bribes to government officials. What should I do?

This matter should be reported to Compliance or the Renejix Hotline for investigation. If there is bribery or facilitation payments and we fail to act, both you and our Company could be liable. While investigating these kinds of matters can be culturally difficult in some countries, any agent doing business with us should understand the necessity of these measures. It is important and appropriate to remind our agents of this policy.



Policy on Anti-Bribery and Anti-Corruption



# OUR COMMITMENT TO DO THE RIGHT THING

## Fair Competition

We believe in free and open competition and never engage in improper practices that may limit competition. We never look to gain competitive advantages through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unethical or illegal business practices.

Antitrust laws are complex and compliance requirements can vary depending on the circumstances, but in general, the following activities are red flags and should be avoided and, if detected, reported to Legal or the Renejix Hotline:

- Sharing our Company's competitively sensitive information with a competitor.
- Sharing competitively sensitive information of business partners or other third parties with their competitors.
- Attempting to obtain non-public information about competitors from new hires or candidates for employment.

### *Acquiring Business Intelligence*

When collecting business intelligence, Renejix employees, and others who are working on our behalf, must always live up to the highest ethical standards.

We must never engage in fraud, misrepresentation, or deception to obtain information. Nor should we use invasive technology to “spy” on others. We also need to be careful when accepting information from third parties. You should know and trust their sources and be sure that the knowledge they provide is not protected by trade secret laws, non-disclosure, or confidentiality agreements.

While Renejix may employ former employees of competitors, we recognize and respect the obligations of those employees not to use or disclose the confidential information of their former employers.

# OUR COMMITMENT TO DO THE RIGHT THING

## Do the Right Thing

- › Do not enter into agreements with competitors or others to engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers, or markets.
- › Do not engage in conversations with competitors about competitively sensitive information.
- › Obtain competitive information only through legal and ethical means, never through misrepresentation. Respect the obligations of others to keep confidential information confidential.



- › **Collusion** - when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages, or allocations of markets.
- › **Bid-rigging** - when competitors or service providers manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding or knowingly submitting noncompetitive bids.
- › **Tying** - when a company with market power forces customers to agree to services or products that they do not want or need.
- › **Predatory pricing** - when a company with market power sells a service below cost to eliminate or harm a competitor, with the intent to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.
- › Using job interviews as a way of collecting confidential information about competitors or others or retaining records from prior employers in violation of laws or contracts.
- › Using anyone else's confidential information without appropriate approvals.



# OUR COMMITMENT TO DO THE RIGHT THING

## Anti-money Laundering

Money laundering is a global problem with far-reaching and serious consequences. It is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Involvement in such activities undermines our integrity, damages our reputation and can expose our Company and the individuals involved to severe sanctions. Report any suspicious financial transactions and activities to the Legal Department and, if required, to appropriate government agencies.



## International Trade Laws

We strictly comply with all applicable laws that govern the import, export, and re-export of our products, and also with the laws of the countries where our products are manufactured or used. Any violation of these laws, even through ignorance, could have damaging and long-lasting effects on our business.

If your responsibilities include exporting products or receiving imported products, you are responsible for screening customers, suppliers, and transactions to ensure that we comply with all applicable export and import requirements.

### *Anti-boycott Regulations*

We are subject to the anti-boycott provisions of U.S. law that require us to refuse to participate in foreign boycotts that the United States does not sanction. We promptly report any request to join in, support, or furnish information concerning a non-U.S.-sanctioned boycott.



# OUR COMMITMENT TO DO THE RIGHT THING

## Do the Right Thing

- › Obtain all necessary licenses before the import or export, or re-export of products, services, or technology.
- › Report complete, accurate, and detailed information regarding every imported and exported product, including its place(s) of manufacture and its proper customs value.
- › Direct any questions you have regarding imports or exports of our products, parts, or technology to the Head of Global Supply Chain, the logistics and customs compliance team, Legal, or Compliance.

## Be Aware Of

- › Transferring technical data and technology to someone in another country, such as through email, conversations, meetings, or database access. This restriction applies to sharing information with coworkers, as well as non-employees.
- › Transporting Company assets that contain certain technology (such as a computer an associate takes on a business trip) to another country.
- › Other related payments that are part of customs value such as royalties or license fees paid on the imported merchandise.



## Consider This

A clinical trial site reached out to get the customs information relating to a recent shipment. Can I just forward them the forms I have from the shipping agent?

**No.** All import and export transactions are managed by Supply Chain, and this request should be forwarded to them to ensure we are responding appropriately.



# OUR WORLD AND OUR COMMUNITIES

## Environmental Stewardship

We recognize our environmental and societal responsibilities. We are committed to sustainability and to minimizing damage to the environment as well as any potential harm to the health and safety of employees, customers, and the public.

### Do the Right Thing

- › Do your part to ensure that protecting team member safety and the environment is a priority. Stop work and report any situation that you believe could result in an unsafe working condition or damage to the environment.
- › Read and understand all the information provided by our Company that is relevant to your job and the health, safety, and environmental effects of our operations.
- › Fully cooperate with environmental, health, and safety training and with our Company's periodic compliance reviews of our products and operations.
- › Be proactive and look for ways that we can minimize waste, energy, and use of natural resources.
- › Contact Environmental, Health & Safety if you have any questions about compliance with environmental, health, and safety laws and policies.



# OUR WORLD AND OUR COMMUNITIES

## Political Activities

You have the right to voluntarily participate in the political process, including making personal political contributions. However, you must always make it clear that your personal views and actions are not those of Renejix, and never use Company funds or resources for any political purpose without proper authorization.

### Do the Right Thing

- › Ensure that your personal political views and activities are not viewed as those of the Company.
- › Do not use our resources or facilities to support your personal political activities.



## Be Aware Of

- › **Lobbying.** Interactions with government officials or regulators that could be seen as lobbying must be discussed in advance and coordinated with the Legal Department.
- › **Pressure.** Never apply direct or indirect pressure on another employee to contribute to, support, or oppose any political candidate or party.
- › **Improper influence.** Avoid even the appearance of making political or charitable contributions in order to gain favor or in an attempt to exert improper influence.
- › **Conflicts of interest.** Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties at Renejix.



## Consider This

I will be attending a fundraiser for a candidate running for local office. Is it OK to mention my position at Renejix as long as I do not use any Company funds or resources?

No. It would be improper to associate our name in any way with your personal political activities.