

FVR – FINNISH VACCINE RESEARCH LTD

CODE OF CONDUCT

FVR – Finnish Vaccine Research Ltd’s (“**FVR**”) Code of Conduct focuses on people’s wellbeing and safety, and responsible business practices. We endorse the ten principles of the United Nations Global Compact regarding human rights, labor rights, environment and anti-corruption, and expect all our business partners to act according to the same principles.

1 OUR PEOPLE

- Our people are central to our success
- We prioritize occupational wellbeing and safety
- We respect and promote human rights, equality and diversity
- We have no tolerance for inappropriate behavior and condemn all harassment
- We comply with labour legislation and respect collective bargaining agreements

1.1 Wellbeing and personal development

FVR’s business is based on the skills, knowledge and experience of our employees. FVR actively seeks to promote a work culture where employees are assessed based on qualifications and merit without discrimination. We encourage continuous development of professional skills, competences and qualifications in order to ensure high quality work. We take the wellbeing of our work community seriously, and systematically assess and develop the impacting circumstances, actively intervening with potential challenges in this regard.

1.2 Employee Health and Safety

We want to guarantee safe and healthy working conditions for all our employees. The health and safety of our employees is a key responsibility of every people manager and employee. We have a dedicated taskforce that is actively working to develop and maintain sustainable working conditions.

1.3 Human Rights

We respect and promote human rights as defined by the United Nations, as well as international labour standards. We strongly condemn both child labour and forced labour. We expect our business partners to share these values and act accordingly.

[We have a special assignment: your health](#)

1.4 Equal Opportunities and Anti-Harassment

FVR requires all employees to treat each other and other stakeholders in a respectful, equal, and fair way. We condemn any form of harassment, discrimination, as well as threatening, intimidating and degrading behaviour. We expect all employees to treat each other with mutual respect and honour everyone's right to privacy and dignity. We do not treat people differently based on their colour, sex, religion, political opinion, social origin, age, disability, health status, trade union membership, sexual orientation, or any other characteristics. We maintain and implement policies and practices that promote equality in our work community. We respect our employee's rights to freedom of association and collective bargaining.

2 RESPONSIBLE BUSINESS CONDUCT

- We always act in FVR's best interest
- We comply with laws and regulations
- We focus on the safety and quality of our research services, protecting people and promoting environmental responsibility
- We report and record accurately
- We protect intellectual property rights and confidential trade secrets
- We develop and maintain mutually beneficial relationships with our business partners, marked by integrity
- We interact openly with authorities and stakeholders

2.1 Acting in the best interest of FVR

We are always committed to acting in the best interest of FVR. All actions taken and decisions made must be in the best interest of FVR, the Company strategy, and support competitiveness and sustainable growth.

2.2 Accuracy of Records and Reporting

We are committed to complying with all laws and regulations of the country in which we operate. FVR operates in accordance with the principles established by the Company's quality system, and strictly and honestly complies with all applicable rules and standards related to accounting and the reporting, recording and disclosure of financial or other information. Regular internal and external reporting are an integral part of our corporate governance.

2.3 Safety and quality of our research services

We deliver high-quality, reliable and safe research services. We are committed to continuous development of our ways of working. Every step of the research practice is carried out in accordance with relevant standards, e.g. Good Clinical Practice (GCP) and relevant study

[We have a special assignment: your health](#)

protocols. Research plans and protocols are evaluated and approved in compliance with legal requirements and volunteer safety as a central element. Data from clinical trials and studies are processed and stored confidentially and in a way that allows for rigorous analysis and correct and transparent reporting. The results are published in a precise and truthful manner.

2.4 Protection of Intellectual Property Rights and Confidentiality of Trade Secrets

FVR seeks to comprehensively protect its own and its partners' confidential information, intellectual property rights and future innovations. We safeguard the confidential information and trade secrets of our business partners in accordance with agreements, applicable laws and regulations.

2.5 Business Partners

FVR develops and maintains mutually beneficial relationships with its suppliers, customers, business partners and other stakeholders. Our business relationships are based on honesty, integrity and trust. FVR expects its business partners to share the Company's Code of Conduct.

Our suppliers must act responsibly and in compliance with all applicable laws, including prohibition of corruption, respect for human rights (including prohibition child labour and forced labour) and in compliance with environmental standards and sustainable development.

2.6 Relations with Authorities and Government – Political Activity

As a special-assignment company, FVR engages actively and transparently in the communities where the Company operates. We promote the well-being of communities for instance by paying taxes, providing direct and indirect employment and through promoting public health via our operations. We do not participate in politics or support political parties or organizations in any way, nor do we participate in funding or supporting election campaigns of individual candidates.

3 ETHICAL BEHAVIOUR

- We condemn any type of corruption or bribery
- We control and declare openly any potential conflicts of interest
- We engage in responsible and accurate communication
- We prohibit the misuse of inside information
- We respect rights for privacy
- We encourage employees, business partners and other stakeholders to use our Whistleblowing channel in case of any suspected breaches of this Code of Conduct

[We have a special assignment: your health](#)

3.1 Anti-Corruption and -Bribery

We do not accept any form of corruption or bribery. We compete fairly and ethically, and within the framework of applicable competition laws. We act with integrity, and do not accept improper benefits – such as facilitation payments, improper gifts, entertainment, gratuities, favors, donations – to our staff, business partners, government officials or other third parties. We engage only with reputable partners who share the same commitment.

We make sure that any gifts or hospitality we engage in are always accurately recorded, of reasonable value and appropriate to the nature of the business relationship. We also expect our business partners to strictly refrain from engaging in corrupt activities when providing services to us or on our behalf.

3.2 Conflicts of Interest

We make sure our decisions are taken independently of private interests. It is the responsibility of all FVR employees to always make business decisions in the best interest of the company and all its shareholders. Any unreasonable decision will jeopardize FVR's integrity, interest, reputation and profitability. Any potential or actual conflict of interest situation must be disclosed to the relevant manager.

3.3 Responsible Communication

The general principles of our internal and external communication are timeliness, honesty, consistency, transparency and accountability. We take into consideration all applicable laws and regulations. We avoid speculation and the disclosure of confidential information.

3.4 Respect for Privacy

We respect the privacy of our employees, study volunteers and business partners, and prioritize the confidentiality of personal information. Personal data is collected, used and processed only for legitimate business purposes in accordance with data privacy laws.

3.5 Whistleblowing

We encourage our employees, business partners and other stakeholders to report promptly if they suspect any violation of the law or FVR's Code of Conduct. More information on FVR's whistleblowing channel can be found at: <https://fvr.fi/en/sustainability-focus-on-peoples-wellbeing-and-safety/>

We have a special assignment: your health