

Code of Conduct

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A LETTER FROM THE CEO

Dear colleagues,

At the core of our work lies an unwavering commitment to both scientific excellence and the highest standards of quality. Every discovery, every innovation, and every process we undertake must be driven by integrity, precision, and a relentless pursuit of knowledge.

We strive to uphold the highest professional and moral standards. The accuracy of our methods, the reliability of our data, and the trust we earn from colleagues and customers depend on our dedication to steadfast credibility at every stage. Ensuring these standards is not merely an expectation; it is a necessity that defines who we are as Nordic Bioscience.

I encourage you to embrace this Code in your daily work, using it as a guide to navi-

gate challenges, make thoughtful decisions, and contribute meaningfully to our mission. If ever in doubt, seek guidance, ask questions, and hold one another accountable. Science and quality thrive in an environment built on integrity and collaboration, and together, we will continue setting the benchmark for leading expertise.

Thank you for your dedication to these values. The impact of our work extends far beyond today, shaping discoveries that will define the future.

Sincerely,

Morten A. Karsdal
CEO



Morten A. Karsdal
CEO



Purpose and scope of the code



The Board of Directors (the “Board”) of Nordic Bioscience A/S (“Nordic”) has adopted this Code of Conduct (the “Code”) to encourage Nordic’s directors, officers and employees (each a “Nordic Representative” and, collectively, the “Nordic Representatives”) to act ethically and legally when conducting business in the name of Nordic and performing their everyday duties.

This Code is not intended to be a comprehensive rule book, but rather a general guideline on how we as Nordic Representatives should act and think. It should be viewed as imposing the minimum standards Nordic expects from us when conducting our business.

This Code cannot address every possible scenario that may arise during our business. Therefore, you are expected to always exercise sound judgement and ethical decision-making in seeking to comply with the Code.

The Board has the responsibility of administering the Code. The responsibility for the day-to-day administration and implementation of the Code has been delegated to Nordic’s General Counsel who is the primary responsible for observing Code’s use and effectiveness, dealing with any queries about it, monitoring compliance activities and performing periodical review of the Code.

All Nordic Representatives are expected to be familiar with the Code and to adhere to the principles and procedures set forth below. And we expect our alliance partners and third parties, including consultants, contingent workers, and suppliers, to act in a way that is consistent with our Code when conducting business on behalf of Nordic.





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Compliance with Laws, Regulations, and Internal Rules

Nordic is obliged to conduct its business in compliance with applicable laws, rules, and regulations. You are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules, and regulations and to ask for advice when you are uncertain about them.

Next to the laws, rules, and regulations, we have internal rules that are specific to Nordic and may go beyond what is required by law, e.g., our internal company policies, standard operating procedures, and work instructions, which help us do our job. They describe and specify the organizational structure, processes, rights and obligations of Nordic and the Nordic Representatives.

We shall never engage in any unlawful activity in conducting our business or in performing our everyday company duties, nor shall we instruct others to do so. If you become aware of a violation of any law, rule, or regulation by Nordic, whether by Nordic Representatives or any third-party doing business on behalf of Nordic, it is your responsibility to promptly report the matter to your supervisor or to the General Counsel.



Scientific Excellence and Quality go hand in hand

Our top priority is to provide the highest quality commercial services with a focus on data integrity, customer satisfaction and scientific excellence.

Excellent science is the core of everything we do

At Nordic we see scientific excellence not only in the sense of excellence in scientific research, but also as excellence in connecting science to society, in teaching and mentoring young scientists. We are proudly taking part in and responsibility for the education of the next generation of quality- and integrity-minded professionals. That is why we support an active master student program and collaborate with universities on education of PhDs in selected scientific areas. To facilitate sharing of knowledge and scientific results, all Nordic Representatives but particularly scientists, researchers, and students are for instance frequently invited to participate in scientific meetings.

It is important for us at Nordic to strive for continuous development of the business to meet the future customer demands. Nordic fosters a workplace that allows people to be the best by providing opportunities for individual growth and novel scientific achievements. We are proud to be contributing the acquired knowledge and publishing peer-reviewed publications in recognized journals and participate in the series of the Biochemistry of Collagens, Laminins and Elastin books to incorporate recent research advances. Our research impact is focused on the benefits of research outside academia, such as social, economic, and other benefits.

We embed and ensure quality in our services

Excellent science is supported by a quality mindset in everything that goes into our products and services to customers. Our clinical laboratory and all its supporting functions maintain an efficient Quality Management System (QMS) to consistently meet the regulatory and customer requirements and actively promote a culture of

quality. Data Integrity and GxP compliance are fundamental elements in our QMS demonstrating towards our customers and other stakeholders that quality is embedded in all our processes and procedures.

We are following ALCOA++ principles to ensure data integrity. Data integrity is a part of our internal Quality Control and Quality Assurance review processes. The purpose of the review processes is to ensure that data is collected, processed, reviewed, reported, and archived in compliance with the principles of ALCOA++, and that compliance with industrial standards, regulatory requirements and company requirements is achieved.

We are collecting feedback and expectations from our consumers to help us improve the quality.

All paper and electronic records shall be:

- A:** Attributable
- L:** Legible
- C:** Contemporaneous
- O:** Original
- A:** Accurate
- ++:** Complete, Consistent, Enduring, Available, Traceable

Conflict of Interests

We are all required to act in the best interests of Nordic and are expected to abstain from any activities that might interfere with the performance of our duties at Nordic. We must recognize and avoid situations that may cause an actual or apparent Conflict of Interest between our personal interests and Nordic's interests.

Examples of situations where a potential conflict of interests may exist

- A second job with a customer of Nordic
- Involvement in hiring a family member
- A romantic relationship in workplace between individuals in a reporting chain
- Pushing personal financial interests

Anti-Bribery and Anti-Corruption

Nordic does not tolerate any bribes, kickbacks or other improper payments, transfers, or receipts. Applicable anti-corruption laws, including the US Foreign Corrupt Practices Act (the "FCPA"), the UK Bribery Act ("UKBA"), where applicable, and other local anti-corruption laws, prohibit Nordic and Nordic Representatives from offering, giving, or receiving any form of bribe or kickback anywhere in the world. These prohibitions apply not only to the Nordic Representatives, but also to anyone who represents Nordic or conducts business on behalf of Nordic.

To ensure compliance with the law, it is essential that Nordic's financial records, books, and accounts accurately and fairly reflect all corporate transactions, no matter how small. Bribery is a criminal offence and in addition to Nordic's disciplinary processes, individuals found guilty of bribery can face criminal charges.

Examples of a bribe or a kickback

- Paying public officials' inducements to secure a contract
- Making small undocumented payments to customs officials to expedite the passage of goods
- A procurement professional accepting a bribe to award a contract to a vendor

Trade Sanctions and Export and Import Control

We do not conduct business that would risk breaching international trade sanctions both locally and on an international scale and we have a no-tolerance approach to any activities or engagements that would risk breach of and/or failures to adhere to the sanctions lists adopted by United Nations, the European Union, the HM Treasury and the U.S. Office of Foreign Assets Control the Legal Framework. We are committed to implementing and maintaining sanctions compliance program which is consistent herewith and adequate to the risks we face in relation to the goods and services we source or sell and the third parties we deal with, directly and indirectly, with the purpose of ensuring sanctions and trade laws compliance throughout our supply chain.

Gifts, Entertainment and Hospitality

We shall not accept or offer gifts, hospitality, payments, bribes or favors from or to an external party, where these might appear to be inappropriate. We may only offer or accept gifts and hospitality that have a legitimate purpose, are appropriate, infrequent and of modest value. We shall not under any circumstances accept or offer gifts, entertainment or hospitality that are not permitted under local laws and regulations and in compliance with this Code. When dealing with public official officials, we generally do not offer any form of gifts, entertainment, or hospitality. Should a public official request a gift or that hospitality be provided, the General Counsel shall be immediately informed. If a Nordic Representative provides a gift or hospitality having been asked to do so by a public official, the Nordic Representative leaves themselves and Nordic exposed to accusations of bribery. It is therefore essential that any Nordic Representative take advice before responding to any such request.

Nordic Representatives shall ensure transparency about offering and accepting gifts, entertainment, and hospitality by informing their direct supervisor. Every effort should be made to refuse or return a gift that is inappropriate. If it would be inappropriate or not possible to refuse or to return a gift, you must promptly report the gift to your supervisor or to the General Counsel. If it is questionable whether it is appropriate to accept a gift or something else of material value, you must contact your supervisor or General Counsel.

Examples of inappropriate Gifts, Entertainment and Hospitality

- Payments of cash
- Payment of expenses for shopping trips
- Inappropriate travel (e.g., covered as “conference,” for instance a one-day conference followed by a paid week at a resort)
- Any gifts, whatever their value, from or to a public official
- You offer an expensive dinner to an important customer and the customer representative’s spouse and family
- A third party offers you or a relative medical treatment
- As a decision maker, you are offered an expensive watch or laptop before selecting the winner of a contract

Confidentiality and Business Sensitive Information

Everyone at Nordic shall maintain, respect, and protect confidentiality of confidential and business sensitive information entrusted to them by Nordic, our suppliers, and customers. Confidential information includes all non-public information that might be of use to competitors or, if

disclosed, harmful to Nordic or our suppliers and customers. Access to Nordic confidential information and records is only permitted for legitimate business purposes.

Confidential information also includes any patient, study or customer data or files. Our customers, collaborators, and suppliers equally value their own confidential information, and we have an obligation to safeguard their confidential information from unauthorized disclosure.

We need to be careful when dealing with confidential or business sensitive information as it might come in many formats. It can be written, oral, or electronic and include a wide variety of information, including information about technology, processes, costs, suppliers, customers, etc. Therefore, when dealing with third parties who may get access to our confidential information, you must always ensure that proper confidentiality agreements are in place.



Examples of business sensitive information

- Business, strategic, or marketing plans
- Sales targets and sales
- Other non-public financial information
- All commercial and research contracts
- Standard Operating Procedures
- Internal and external audit reports
- Management reviews
- Study Master Binder (physical and electronical)
- Data transfers
- All research that is not published or patented
- Cohort information
- Patient information
- Biomarker raw data
- Device Master Records
- Milestone reports
- Batch records

Competition Law

Nordic complies with all applicable antitrust and competition laws. We compete honestly and preserve fair and open competition. Nordic Representatives shall ensure to not disclose or exchange information with any competitor, directly or indirectly, regarding business sensitive information, which is internal to Nordic, without the prior approval of the General Counsel. When engaging with competitors, Nordic Representatives must only obtain competitive information from publicly available sources such as websites or publications and not ask for confidential information from competitors or former employees of competitors.

All of us, but especially those of us who are involved in purchasing, sales, and marketing, have the responsibility to ensure that they are acting in compliance with the applicable competition laws. When in doubt, contact the General Counsel.

Supplier Engagement

Our Suppliers are expected to conduct their business in compliance with the applicable laws, regulations, and ethical standards equal to those, we follow at Nordic set out in this Code.

Suppliers are carefully chosen based on quality and compliance standards, costs, delivery, service, and their reputation. Our critical suppliers become qualified parts of our QMS, where they are being monitored and reevaluated periodically. Any material violation of the Code, critical audit findings or compliance failure may lead to the disqualification of a supplier.

Human and Labour Rights

Nordic is committed to comply with international conventions on human rights and labour standards, including Universal Declaration of Human Rights, International Covenant on Economic, Social and Cultural Rights, Convention on the Rights of the Child, and international labour law. Nordic recognizes the importance of promoting fundamental human rights and labour standards across our operations. The fundamental labour standards include the prohibition of child labour and prohibition of forced labour in all its forms. Nordic does not tolerate forced labour, slavery, and human trafficking.

Nordic respects the right to non-discrimination; the right not to be subjected to slavery, servitude or forced labour; the right not to be subjected to sexual harassment, physical or verbal; the right to family life, incl. protection of mothers before and after childbirth and children's and young people's protection from exploitation e.g. no child labour; the right to form and join trade unions, incl. the right to collective bargain and the right to strike; the right to privacy; the right to a safe working environment; and the need for a sound work-life balance.



Fair Treatment in the Work Environment

As an employer, Nordic will not tolerate illegal discrimination or harassment of any kind. We are committed to providing a safe, diverse work environment free of discrimination based on race, color, religion, age, gender, nationality, citizenship, ancestry, sexual orientation, marital or familial status, disability, veteran status, or any other basis prohibited by applicable law.

We have a zero-tolerance policy for offensive behavior or workplace violence, in any form, including engaging in any act that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats, or any expressions of hostility, intimidation, aggression, or hazing.

While it is the responsibility of the management to maintain a safe and secure environment free of any kind of offensive behavior, we are all encouraged to come forward if (potential) violations are observed or experienced. Actual and potential violations shall be reported to either your super-

visor, Human Resources, or via the Whistleblower portal accessible at [Whistleblower – Nordic Bioscience](#).

We are committed to managing and operating our assets in a manner that is protective of human health and the environment. We comply with the local environmental laws and regulations and obtain good cooperative relationships with the government and its officials.

Examples of how Nordic is protecting the environment

- Recycling 99 % of all paper waste
- Empty bottles and cans are placed in designated containers
- Switching to more energy efficient appliances and lightbulbs
- Biodiversity projects in our lawns
- No weed killers are used on site
- Insect hotels are placed where there are no naturally created habitats

The health and safety of all Nordic Representatives are of great importance to Nordic; therefore, we have implemented health and safety procedures for taking due and proper care of all of us. Nordic has established a Health and Safety Committee (Arbejdsmiljø Organisation, “AMO”). The function of AMO is to ensure the safety and well-being of individuals in the workplace by promoting and enforcing health and safety regulations, standards, and practices. The goal of AMO is to prevent accidents, injuries, and illnesses and to create a safe and healthy environment for everyone.

Nordic Representatives are encouraged to report conditions that they perceive to be unsafe, unhealthy, or hazardous to the environment to your direct supervisor or a representative of AMO.

How is AMO maintaining a safe and healthy environment?

- By developing and implementing policies and procedures to ensure compliance with health and safety regulations and standards
- By providing education and training to employees in safety procedures and practices
- By conducting safety audits and risk assessments to identify and mitigate potential hazards
- By participating in the preparation of the company's workplace assessment (APV)
- By investigating and reporting incidents or accidents that occur in the workplace and developing strategies to prevent them from happening again
- By providing support and resources to employees who have been injured or affected by health and safety incidents

Privacy, Information Protection and Security

In our work, we handle and process personal data of donors, colleagues, business partners etc., and therefore compliance with data privacy laws must always be of utmost importance to Nordic Bioscience. The protection of personal data at Nordic shall comply with the requirements and procedures set forth in the EU General Data Protection Regulation ("GDPR") and Nordic Bioscience's Privacy Compliance Program. This includes that we adhere to the basic rights of all people whose personal data we process at Nordic Bioscience.

Due to the nature of Nordic's processing of personal data, we have appointed a Data Protection Officer ("DPO"), and we have a Privacy Organization that supports personal data compliance in our daily operations. Each department has its own Privacy Manager who can serve as the department's first point of contact for privacy-related inquiries.

Your fundamental rights under the GDPR include:

- A right to withdraw a consent to Nordic's processing of your personal data
- A right to access your own personal data
- A right to rectification of inaccurate personal data
- A right to erasure of personal data
- A right to obtain a restriction of processing of personal data
- A right to data portability
- A right to object
- A right to lodge a complaint with the Danish Data Protection Agency

Nordic acts as the data processor when processing personal data on behalf of a data controller (e.g., our customers for our clinical lab services). This personal data is pseudonymized and belongs to the people enrolled in scientific studies or clinical trials. The pseudonymized data includes information such as age, gender, and potential health information. The purpose

of processing of these personal data is to perform measurement and analyses of human donor material and deliver the results of such samples and analysis to the data controller, including storing of personal data and return/deletion/destruction of personal data as per the data controller's instructions.



Social Media and AI

Nordic encourages the use of social media and other online platforms for business communication and networking purposes. However, we should be using technology in a critical and professional way. We should be mindful about how we present ourselves in public settings, as well as online or on networking sites. Confidential information regarding Nordic Bioscience shall not be published, and other Nordic Representatives or Business Partners shall not be quoted or referenced without their authorization. We shall respect intellectual property and copyright-protected material.

If used with a critical mindset, large language-model based chatbot/service can be extremely valuable and save considerable resources. However, we need to be critically aware that all sent-out information to such platforms is a potential disclosure of sensitive data from Nordic or our Business Partners.

Therefore, when using these services, unless you are using a solution sourced by Nordic, you are not to include any information you would deem business critical or sensitive to Nordic or our Business Partners, e.g. draft publications and other unpublished scientific information, financial performance information, customer data, patent applications, protein/peptide sequences for assays/drug candidates in development, personal data of any kind, etc. Nordic Representatives can use the platforms for general information searches, problem-solving and as writing assistants for e.g., editorials without original result, however, always apply common sense and trust your own critical sense. This means that your own proofreading, fact checking, rewriting etc. is absolutely imperative. If you are in doubt about the use of AI, you should contact the IT or Legal department.



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All current and eventually employed Nordic Representatives shall be provided with a copy of this Code. They are expected to read and understand the Code and confirm such a review by signing off on a periodic basis when updates to the Code happen. All Nordic Representatives can request the Code from the Legal or the HR departments.

Speak up – our whistleblower system

Any Nordic Representative who knows or believes that any other Nordic Representative has engaged or is engaging in Nordic-related conduct that violates applicable law, or this Code is strongly encouraged to report such information. Any reporting can happen on a completely anonymous and confidential basis by

submitting it through our Whistleblower Portal that can be found on Nordic's website: [Whistleblower – Nordic Bioscience](#).

Our Whistleblower Policy, which describes which types of situations could be reported via the Whistleblower Portal and how your rights secured when you make a report on the portal, is also available on Nordic's website.

Nordic has appointed a whistleblower unit that will receive the reports, be in contact with the Whistleblower and will follow-up on the reports and give feedback to the Whistleblower. The whistleblower unit consists partly of lawyers from an external law firm and partly of an impartial group of people at Nordic. The whistleblower unit will treat all written reports as confidential in accordance with our Whistleblower Policy.



No Retaliation

Retaliation means unfavorable treatment or unfavorable consequences as a reaction to a report. This may be suspension, dismissal, demotion, or equivalent measures.

Nordic expressly forbids any retaliation against any Nordic Representative who, acting in good faith based on a reasonable belief, reports suspected misconduct. If you in good faith report a violation of the Code, via the Whistleblower Portal, your direct supervisor, HR, or any other channel, you are not to be sanctioned. Specifically, Nordic will not discharge, demote, suspend, threaten, harass or in any other manner discriminate against, such Nordic Representative in the terms and conditions of their employment. Any Nordic Representative who participates in any such retaliation is subject to disciplinary action, including termination.

Non-compliance with the Code

Failure to comply with the standards outlined in this Code may well, to the extent permissible under applicable law, result in disciplinary action. Depending on the severity of the violation, such action may include reprimands, warnings, probation, or suspension without pay, demotions, reductions in salary, discharge, and restitution. Certain violations of this Code may require Nordic to refer the matter to the appropriate governmental or regulatory authorities for investigation or prosecution.

Nordic Representatives are expected to cooperate in internal investigations into alleged misconduct. A Nordic Representative involved in an investigation of possible misconduct in any capacity cannot discuss or disclose any information to anyone outside of the investigation unless required by law or when seeking own legal advice.

Waivers

While some of the policies contained in this Code shall be strictly adhered to and no exceptions can be allowed, in other cases exceptions may be appropriate.

No waiver of any provisions of the Code for the benefit of a director or an executive officer shall be effective unless approved by the Board. Any other Nordic Representative who believes that a waiver of any of these policies is appropriate in their case should first contact their supervisor. If the supervisor agrees that a waiver is appropriate, the approval of the General Counsel shall be obtained.

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