

# Code of conduct



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## 2. Our Code of Conduct

At Solynta, we are committed to how we do our work and the integrity of our actions. Ingrained in our culture, integrity inspires our work and strengthens our reputation as a Company that is set to do extraordinary things, in this process we will always do what is right.

Sometime, you might face a situation where the right thing to do is not obvious. That is where our Code of Conduct can help. It is always here as your guide to preserving our reputation and living our values. While the Code cannot answer every question, it can show you where to go for guidance when the answer is not entirely clear, or open to multiple interpretations.

### 2.1 Why It Matters

While compliance with the laws and regulations is mandatory, it also shows our commitment to acting as a responsible organization. It demonstrates we care about and respect the people we do business with and other stakeholders like our employees. In addition, non-compliance with laws and regulations can result in civil or criminal fines, penalties or imprisonment.

#### 2.1.1 How Can the Code Help You?

The Code enables you to:

- Conduct yourself honestly and ethically;
- Uphold our values and protect our reputation;
- Understand what Solynta expects from you;
- Make good decisions every day;
- Comply with laws, regulations and standards that govern our organization;
- Understand where to go if you need any assistance.

### 2.2 Applicable laws, regulations and Administering the Code

This Code of Conduct is governed by Dutch laws and regulations.

As the board members are responsible driving most of Solynta's Key decisions, they will also take responsibilities for administering the Code in an objective and consistent manner. The board will enforce the Code in alignment amongst the board members and in collaboration with the HR lead and as governed by Dutch laws and regulations.

## 3. Managers and Senior leadership

Managers and Senior leadership are available to answer questions and are generally most familiar with the Company guidelines that apply to the business activities in our organization.

## 4. Human Resources

HR will take lead in explaining and answering questions about employment policies, benefits and workplace issues.

## 5. Every manager's responsibility

As a manager, you have a special and important responsibility to set an example and act in a manner consistent with our Code. Here are important guidelines you should follow:

- Act as a role model, demonstrating ethical behaviour in the performance of your duties;
- Make objective business-related decisions;
- Review the Code at least once a year with your employees;
- Help employees understand the Code and Company policies, and direct them to resources to help them live the Code every day;
- Ensure employees are aware of, and properly trained on, the relevant laws, regulations and Company policies that govern the business activities in which they engage on the Company's behalf;
- Create an environment that fosters and enables ethical behaviour, where employees are comfortable speaking up without fear of retaliation;
- Take seriously any concern raised by an employee that compromises the Code, and determine if the issue should be escalated. If so, escalate the matter as soon as possible. For further information on this topic, see our [Reporting Policy](#);
- Take corrective or preventive action when someone violates the Code. Fully support any investigation.

## 6. Who Is Covered Under the Code of Conduct

It does not matter where you work or what you do for the Company – you have a responsibility to use good judgment and follow our Code of conduct. That includes every full-time or part-time employee at every level of the Company, all the way up to the board members. All employees, and any others subject to the Code, must acknowledge that they have read and agree to uphold the Code. A Code of Conduct applies to everyone who acts for or on behalf of Solynta. This means not only for employees, board members and the Supervisory Board, but also for companies and institutions that work on behalf of Solynta. Where this document refers to "the employee" or "you", this also refers to "the representative" of Solynta.

Anyone who works on the Company's behalf (including suppliers, consultants and other business partners) must share our commitment to integrity by following the principles of our Code when providing goods and services to the Company or acting on our behalf.

## 7. Uphold the laws and regulations

Laws and regulations can vary widely from country to country. Therefore, the laws and regulations, customs and/or practices of the country where we do our work might be applicable in addition to this Code of Conduct and Dutch laws and regulations. As we continue to expand cross-border work, knowing which laws and regulations to follow can be complicated, so – before you act on behalf of the Company – be sure you know the laws and regulations related to your job in the country (or countries) where you do business. Sometimes local customs or practices can conflict with our Code or the laws and regulations. In cases like these, follow the laws and regulations and our Code. Contact local legal counsel for guidance in alignment with your board-member.

## 8. Your Rights as an Employee

While we expect you to follow our Code, we also recognize your rights as a Company employee. For example, you have the right to speak publicly about matters of public concern or to participate in certain activities related to the terms and conditions of your employment (including discussions about wages, hours, working conditions, health hazards and safety issues). Nothing in this Code or in

any Company policy is intended to limit or interfere with your rights under the laws and regulations. The cost of the investigation and damage will be recovered from the person who caused it. Also, when criminal offences are committed, a report will always be made.

## 9. When a Code Violation Occurs

When one of our employees fails to follow our Code or applicable laws and regulations, ignores someone else's failure to follow the Code or pressures someone else to violate the Code, a violation of our Code has occurred. This can harm the Company and/or its reputation.

We take all potential Code violations seriously. Code violations may lead to disciplinary action that matches the nature and circumstances of the violation, up to and including suspension, loss of merit increases or annual incentives and termination of employment (including, but not limited to, an instant dismissal). If an act violates the laws and regulations, costs of damage and investigation are recovered from the person(s) causing them and criminal offenses are always reported.

The Company has other policies and processes governing performance, conduct and behaviour. Policy violations that are not Code violations will be handled under the appropriate policy or procedure.

## 10. How Do I share concerns?

Please contact your line manager, a board member, HR ([hr@solynta.com](mailto:hr@solynta.com)) or the confidential advisor (more information about the confidential advisor can be found in the [Reporting Policy Solynta](#), containing the specific steps to be taken in case of alleged integrity violations).

## 11. Reporting Concerns

Maybe you sense that something is not right at work. Maybe you saw something or heard about an act that may violate our Code, our policies or the laws and regulations. If so, you have a responsibility to share your concerns by reporting right away – even if you are not sure that a Code violation has occurred.

When you report concerns, you help us handle issues properly, fix problems before they occur and remedy situations that have already happened. You also help build trust with each other, and with our customers, suppliers and other business partners.

You may choose to remain anonymous, where permitted by laws and regulations.

If you do give your name, we will do all we can to protect your identity consistent with conducting a thorough investigation.

We take every report seriously and we will investigate it thoroughly and as confidentially as possible. We expect everyone involved to cooperate fully and honestly.

Where necessary we will involve our legal counsel.

## 12. No Retaliation

You are the eyes and ears of our Company, and we value your help in avoiding and uncovering possible misconduct or other integrity violations. We strictly prohibit retaliation of any kind against anyone who shares a good-faith concern or participates in a Code investigation. Sharing a good-faith concern about the Code honestly – even if it turns out to be unfounded – is never an excuse for any kind of retaliation.

### **12.1 What is Retaliation?**

We define retaliation under our Code as any action that would likely deter someone from reporting a Code concern or participating in a Code investigation. Examples of retaliation might include demotion, firing, a reduced salary, job reassignment, threats, harassment or any other action taken against someone because they raised a Code concern, participated in a Code investigation, or attempted to deter someone from violating the Code.

While we take the anti-retaliation provisions of our Code very seriously, these provisions do not protect you from disciplinary action for your own misconduct, meaning you should not report a Code concern simply to avoid discipline for your own violation of the Code or other Company policy.

### **12.2 No False Accusations**

As much as we encourage honest reporting, we do not tolerate knowingly false reports. Making a false accusation can divert investigatory resources away from credible good-faith concerns and damage morale. Report what you have a reasonable, good-faith belief to be true, but never knowingly make a false accusation, lie to investigators or refuse to cooperate in an investigation, as these actions may also violate our Code.

## **13. What Do We Protect?**

### **13.1 Our IP material**

Patents, copyrights, trademarks and trade secrets are also valuable Company assets. Protect IP with a passion, and remember that the Company owns any work product (such as ideas, processes and inventions) that you develop or design in your work with us to the extent permitted by laws and regulations. That ownership continues even if you leave our Company.

More details can be found in the employment contract, consultants' contracts third-party contracts and business partnership contracts.

### **13.2 Safeguard our Assets**

The buildings and facilities we work in, including the green-houses, the technology that connects us to others, the ideas we develop, the emails we exchange, the company vehicles we use, the computers and mobile devices we use to do our jobs; all of the above and more are **Company assets** that we are each entrusted to use and protect. We use them to carry out Company business and must protect them from damage, loss, misuse and theft.

#### **13.2.1 How We adhere**

Do not use Company assets:

- For an outside business and/or other personal gain;
- For anything illegal and/or unethical (such as, but not limited to, access to – or dissemination of – pornographic or offensive subject matter).

Personal use of Company assets – within reason – is only permitted with prior approval of the Company. However, personal use of Company assets should always be appropriate, infrequent, lawful and never interfere with the time, talent and passion you, or any other employees, bring to work.

### **13.3 We maintain accurate records**

Accurate recordkeeping and reporting helps us meet our legal and regulatory requirements.

Maintaining financial integrity also reflects positively on our reputation and credibility. Each of us – at

every level of our Company – has a responsibility for ensuring the accuracy of all Company business and financial records.

#### **13.3.1 How We Adhere**

From resumes, time sheets and benefit claim forms to expense reports, quality assurance records, budget forecasts and regulatory filings, we all handle Company “records.”

Be sure to follow all internal processes, policies and generally accepted accounting principles so that our records accurately reflect all transactions. Be honest, accurate and complete in what you record.

#### **13.4 We prevent money laundering**

We would never knowingly look the other way when it comes to illegal activities, but we understand that criminal activity like money laundering may not always be obvious, so it is important that we work to reduce our exposure and speak up about anything suspicious.

##### **13.4.1 How We Adhere**

Money laundering is a process where funds generated through criminal activity – such as terrorism, drug dealing, tax evasion, human trafficking and fraud – are moved through legitimate businesses in order to hide their criminal origin. We are committed to conducting business in a way that prevents the use of our business transactions by those who might abuse them, so we comply with anti-money laundering, financial crime and anti- terrorism laws and regulations in all countries where we operate.

#### **13.5 We Avoid conflict of interest**

We are all expected to act in the best interest of our Company. This means we must never allow our personal interests to influence our actions on behalf of the Company. Every decision we make while on the job must be objective and with our Company’s business interests in mind.

##### **13.5.1 How We Adhere**

In business, the line between personal and professional interests can become easily blurred. Separating the two can be challenging, especially when personal relationships, outside employment or investments are involved. Before you act on the Company’s behalf, you need to be able to recognize and avoid potential conflicts of interests.

A conflict happens when you allow personal interests to interfere with the business decisions you make as an employee. Conflict of interest is inappropriate and can damage our Company and our reputation.

Ancillary positions, ancillary activities or running your own business part-time should always be reported to HR.

## **14. We build transparent relationships**

Our **suppliers, customers** and **other business partners** place a great deal of trust in Solynta and we are determined to never let them down. We see them as real partners – essential to our Company’s growth and success.

### **14.1 How We Adhere**

Our relationships with our suppliers, customers, and other business partners must be fair, positive and productive. Customers/stakeholders are always treated with respect, regardless of their origin,



religion, ethnicity or political beliefs. No verbal or non-verbal expressions of a discriminatory, intimidating or sexist nature are acceptable. During working hours, but also outside of working hours, you speak respectfully about our customers/stakeholders. Building these relationships is an ongoing process and requires an enduring commitment to high standards of business conduct. In every interaction we have with these third parties, we must demonstrate honesty and a commitment to our values.

Just one deceptive or dishonest act can seriously damage a relationship. So make sure you understand your responsibilities and always deal fairly with our suppliers, customers, and other business partners.

Integrity is not a unilateral obligation – it is a responsibility we share with our suppliers and other business partners. That is why we require our suppliers and certain other business partners to adhere to our code of conduct.

If you are responsible for a supplier relationship, help us ensure that we are only doing business with suppliers and other business partners who share our commitment to doing what is right by including contractual provisions regarding safeguarding the laws and regulations and ensuring compliance.

## **15. We comply with trade compliance laws and regulations**

We will comply with the laws and regulations that govern international trade. We expect those in our Company to know and understand the requirements that apply to the movement of our products, services and technologies.

### **15.1 How We Adhere**

As we continue to expand our cross border, activities, we will follow all applicable import and export laws and regulations associated with the countries where we operate. We do not conduct unauthorized business with countries or third parties that are subject to trade embargoes or economic sanctions.

## **16. We do not tolerate bribery**

We are a company that has the ambition to do business around the globe in many different countries, with many different partners. In the process of doing business, we will frequently work with government authorities and officials in the countries where we are active.

It is important that we are all alert to make sure we do not engage in bribery and facilitating corruption. Not only because this is by laws and regulations prohibited in many countries, but also because as a company we strive to do good wherever we are active.

In this policy you'll find rules of what is expected of you in case of circumstances you suspect you might be involved or can be involved in bribery or corruption related activities.

Overall, you do not accept (or give) gifts, invitations or other advantages that could contradict the company's interest; Bribery in any form is unacceptable!

We understand however that there are grey lines in which the purpose of both offers or promises are not always clear. In those situations we expect everybody to exercise with caution and use good judgment in this regard. If in doubt, you can always contact Solynta's Headquarters to discuss the situation. So if you do not trust the situation completely, don't go forward with it.

### 16.1 Your responsibilities

It is every employee's responsibility to prevent bribery and corruption within Solynta and to comply with our code of conduct. Every stakeholder has an obligation to secure that any interactions with public officials comply with all relevant laws and regulations, as well as our policy.

In this policy minimum requirements have been established in relation to political contributions, charitable contributions and sponsorships, facilitation payments, gifts, hospitality and expenses, etc. Kindly note, these minimum requirements do not supersede national laws and regulations and it is imperative at any time always to comply with relevant national and/or international laws and regulations.

### 16.2 Procedures and sanctions

- Nobody (internal and external) will be penalised or be subject to other adverse consequences for refusing to pay bribes even if it may result in Solynta losing business.
- Failure to observe this code is a cause for disciplinary action, which can lead to an urgent reason for instant dismissal.
- Whenever you observe behaviour that goes against this policy or against our code of conduct or whenever you are in doubt, there are a number of people you can reach out to:
  - 1) Your own manager,
  - 2) HR
  - 3) MT
  - 4) CEO (Hein Kruyt)
  - 5) Confidential advisor (contact details can be found in 2020 Presentation [Confidential Advisor and Integrity](#))
  - 6) External complaints committee (in dept procedure see: [Reporting Policy Solynta](#))
- In principle, your manager is your first point of contact for these issues, but you can always reach out to one of the other contact if you're not comfortable bringing it up with your manager (for example, when it concerns behaviour you have seen with your manager).

### 16.3 Community support

Community support and donations are acceptable, be it in-kind services, knowledge, services exchange, or direct financial contributions. However, managers and employees must be careful to ensure that charitable contributions and sponsorships are not used as a subterfuge for and do not constitute bribery. If you accept any donations (in kind or, services, knowledge, money or otherwise), service exchange or direct financial contributions you are required to report this to HR. HR will register this in the bookkeeping.

### 16.4 Facilitation Payments

Solynta has a zero tolerance policy regarding (illegal) facilitation payment. Faced with a demand for a facilitation payment, the following steps must be taken by the person faced with the demand.

*In case facilitation payment is not allowed by relevant national and/or international laws and regulations:*

1. ask to see the enabling legislation;

2. refuse if enabling legislation is not showed and refer to the prohibition for facilitation payments in anti-bribery legislation and your company policy (even if this may result in Solynta losing business);
3. inform your manager as soon as possible, but in any case before making any payment.

*In case facilitation payment is allowed by relevant national and/or international laws and regulations:*

1. ask to see the enabling legislation;
2. in case enabling legislation is showed, contact your manager as soon as possible, but in any case before making any payment;
3. in case your manager agrees on making a facilitation payment in a particular case, keep the amount to a minimum and ask for a receipt;
4. record the payment in the book keeping system and identify it as a 'facilitation payment';
5. report to the Compliance Manager, your manager, HR, the confidential advisor or the external complaints committee (in dept procedure see: [Reporting Policy Solynta](#)).

### **16.5 Gifts, Hospitality and Expenses**

As a general rule, do not give or receive gifts with a value above €50 without consulting with your manager first. In case you receive gifts below €50, you will inform your manager afterwards so that he/she is aware that the gift was given. It is mandatory to register this type of donation. For this purpose you also report them to HR.

You are not allowed to accept or offer gifts / courtesies which involves cash or cash equivalents. You may offer or receive gifts, hospitality and expenses provided they would not motivate favouritism and or create any obligation. All gifts / courtesies must be reasonable and may not be frequent suggesting a pattern.

Never give or receive gifts / courtesies that could be evaluated as illegal or improper exchanges. You must refrain from offering gifts that violate the recipient's standards (their own gift policies). In addition government or public servants may be under strict guidelines preventing them from receiving gifts. Offering gifts to government or public servants may be considered as a legal offense in certain countries.

Courtesies in the form of travel, meals, receptions, sightseeing, gifts or other expenses may only be offered or given to persons with a professional interest in the relationship but not to any spouses and (private) relatives.

Never offer or receive gifts / courtesies of any form in exchange for actions.

### **16.6 Business partners, distributors and agents**

- We act with care before engaging with a business partner and ensure that business partners respect our code of conduct.
- Screening our business partners, distributors, agents and employees is part of our policy
- Compensation paid to distributors and agents must be appropriate and justifiable remuneration for legitimate services rendered.
- The relationship must be documented and the agent or distributor must agree to comply with our code of conduct.
- We will follow the conduct of our agents and distributors and reserve the right to termination in the event that they pay or solicit bribes or in any other ways violate this code of conduct.

### 16.7 Contractors and Suppliers

- We conduct our procurement practices in a fair and transparent manner and we act with due care when evaluating major prospective contractors and suppliers.
- Concretely, when we procure goods or services for a significant amount, we will always strive towards a competitive selection process involving multiple suppliers / quotations.
- We will follow the conduct of major contractors and suppliers and have a right of termination in the event that they pay or solicit bribes.

## 17. We follow privacy laws and regulations

The basis of any good relationship is trust. When our **employees, customers and business partners (stakeholders)** do business with us, they entrust us with their personal information or third parties' personal information. Our employees do the same when they join the Company. We take our responsibility and obligations to our customers and employees seriously to collect, use and process any personal information only for legitimate business purposes and protect it from possible loss, misuse or disclosure.

### 17.1 How We Adhere

Keeping personal information secure is critical to our people, our business and our reputation. We recognize this responsibility and follow the laws and regulations requiring us to protect personal information that can identify an individual or which relates to an identifiable individual, also known as personal information (PI). Please know that certain PI can be sensitive and require an extra level of protection and a higher duty of care based on applicable laws and regulations (for example medical information).

Many Company employees work with PI (including sensitive personal information) as a part of their job. If you are one of them, guard this information well regarding the access, transfer and use of this information. Under the GDPR regulation PI includes information that relates to an identifiable individual, such as, but not limited to:

- Personal details (such as name, date of birth, gender, address, etc.)
- Email address
- Telephone numbers
- Employee ID number
- Financial information
- Banking information
- Medical information
- Names of family members

Should a data breach occur that was caused by you or someone else, you are enlightened to report it to HR. For example when you lose your laptop, USB stick or a file that has personal information or competitively sensitive information.

## 18. We respect human rights

Respect for human rights is one of our Company's fundamental values. Through our actions and policies, we strive to respect and promote human rights by upholding the UN Guiding Principles on Business and Human Rights in our relationships with our employees, suppliers and customers. Our

aim is to help increase the enjoyment of human rights within the communities where we operate. We expect all employees, and suppliers and customers to avoid causing or contributing to human rights infringements through their business actions.

### 18.1 How we Adhere

Respect for Human Rights through:

- Community and Stakeholder Engagement
- Diversity and Inclusion
- Freedom of Association & Collective Bargaining
- Safe and Healthy Workplace
- Workplace Security
- Do not engage in Forced Labor and Human Trafficking
- Do not engage in Child Labor
- Work Hours, Wages and Benefits are respected
- Land Rights and Water Resources are respected
- Healthy Lifestyles are promoted
- Job satisfaction is key
- Not engaging in discrimination, (sexual) intimidation or harassment, bullying, stalking etc.

## 19. Values and beliefs that drive us Daily

<b>PROUD</b>	Take responsibility for your own work, your knowledge and ideas and receive in exchange appreciation, respect and prestige.
<b>INNOVATIVE</b>	Go for better AND different, not for beaten paths. Be original and state of the art. Continue to develop and be open minded to new ideas.
<b>TOGETHER</b>	It is the collective's action, together with your colleagues and partners that leads to the best results. OUR strength is in collaboration.
<b>CHALLENGE</b>	Every idea, every spark is valuable; do not let yourself be impressed or discouraged by present power or knowledge, speak up.
<b>HUMBLE</b>	Stay fair and modest when it comes to personal contribution; Put your work in the spotlight, not your own personal gain.

**Thank you for being part of demonstrating that we care about and respect the people we do business with and simply for doing what is right.**

## Annex 1: Definitions

**Definitions<sup>1</sup>**

- **Corruption:** the misuse of entrusted power for private gains.
- **Bribery:** to offer, receive, promise or give any undue financial or other advantage, whether directly or through intermediaries, to a (foreign) public official, for that official or for a third party, in order that the official act or refrain from acting in relation to the performance of official duties, in order to obtain or retain business or other improper advantage
- **Facilitation payments:** are a form of bribery made with the purpose of expediting or facilitating the performance by a public official for a routine governmental action and not to obtain or retain business or any other improper advantage. The facilitation payment is typically demanded by low level and low-income officials to obtain levels of service, one under normal conditions would be entitled to. Facilitation payments are prohibited in most countries.
- **Integrity:** circumstance that a person performs his function adequately and carefully in light of his position, and all responsibilities involved. In doing so, one observes the standards and values of Solynta and respects physical immunity.
- **Violation of integrity:** if someone (incidentally or structurally) acts in violation of Solynta's regulations or otherwise fails to comply with its standards and values.
- **Fraud:** deliberate deception to obtain an unlawful advantage. Cases are presented differently than they are by misrepresenting reality (digitally, on paper or verbally). There is intentional misrepresentation and there is an aggrieved party.
- **Unwanted behavior:** all behavior that is not desirable and is perceived as threatening, humiliating or intimidating, such as (but not limited to) aggression, bullying, discrimination, violence (verbal and non-verbal), (sexual) harassment/ intimidation.
- **(Sexual) intimidation:** Influencing someone's behavior by frightening them with remarks, gestures and/or actions (whether or not sexual in nature) or threatening to do so. These can be verbal (e.g. jokes, comments or questions, whether or not of a sexual nature), non-verbal (e.g. staring, gesturing, showing images or videos, whether or not of a sexual nature) or physical (all forms of physical contact such as arm around the shoulder, grabbing, squeezing, kissing, blocking the way, entering someone's comfort zone, assault or rape).
- **Stalking:** systematically and intentionally infringing upon a person's privacy with the intent to compel the other person to do something, not to do something, to tolerate something or to instill fear (such as chasing, threatening violence, unwanted phone calls or messages, ordering something in someone else's name).

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<sup>1</sup> Definitions from the OECD-Convention on Combating Bribery of Foreign Public Officials in International Business Transactions