

# Oxford Target Therapeutics Ltd

21 July 2023

Draft for approval by the Board of Directors

## **Code of Conduct**

Oxford Target Therapeutics' ethical principles are aligned to its goal: to help bring novel healthcare solutions for diseases, more specifically targeting neurodegenerative conditions, to alleviate human suffering.

Oxford Target Therapeutics is focused on investing in the medicines and technologies of tomorrow, while aiming to deliver value to its shareholders.

Oxford Target Therapeutics is committed to the highest standards of ethical business conduct. Oxford Target Therapeutics expects that its employees and associates ("OTT People") follow the highest standards of integrity in the conduct of Oxford Target Therapeutics' business.

This Code of Conduct outlines the high standards of business ethics and integrity required of all OTT People when conducting business on behalf of Oxford Target Therapeutics. All OTT People are responsible and accountable for complying with the provisions of this Code of Conduct as well as with all applicable laws and regulations.

Oxford Target Therapeutics' commitment to the highest ethical principles is embodied in its vision and values:

- We aspire to support innovative companies to deliver safe and effective treatments for millions of patients around the world.
- We value innovation, scientific and business integrity, honesty, respect, creativity, hard work, success and reward.
- We care about people's health and the environment

## Conflicts of interest

Conflicts of interest may arise when OTT People have an interest in any business or property or an obligation to any person that could affect the OTT People's judgment in fulfilling his or her responsibilities to Oxford Target Therapeutics or when their position at Oxford Target Therapeutics is used for personal advantage. OTT People should avoid any activity or investment that constitutes, or may constitute, a conflict of interest between Oxford Target Therapeutics and any third party. Oxford Target Therapeutics expects integrity and ethics from all OTT People.

## Accepting or offering gifts and entertainment

Oxford Target Therapeutics' aim is to avoid third parties from seeking or receiving special favours from OTT People by the giving of gifts. Accepting any gift or entertainment which is substantially more than in a social capacity may appear to be an attempt to influence OTT People into giving preference to a particular customer, vendor, consultant, or the like.

OTT People must not provide or accept gifts or hospitality if it creates a conflict of interest. OTT People should make certain that they provide and accept only gifts and hospitality which are

reasonable, compatible with industry standards and local customs, and in accordance with applicable laws and regulations. OTT People must exercise caution, honesty and good judgment.

#### Interests in other businesses

Oxford Target Therapeutics acknowledges that OTT People are providing similar services to other companies and this Code of Conduct is in no way implied to prevent OTT People from providing similar services to other companies from time to time, which may be engaged in the same areas as Oxford Target Therapeutics as long as direct competition or exchange of confidential information is prevented. Oxford Target Therapeutics expects OTT People to act responsibly, ethically and use their professional judgement. In the event that a conflict of interest arises due to the fact that OTT People or their spouse, or any other member of his/her immediate family have or suspect they have a direct or indirect financial interest in a competitor, they must inform the company in order to determine whether a conflict exists and how to best resolve the situation fairly and amicably.

#### Use of company proprietary and other confidential information

Oxford Target Therapeutics' Proprietary and confidential information must not be used in any way other than as required in performing employment duties or the applicable services. All files, records, reports or any other documents or data in hard copy or electronic form acquired or created in the course of employment are the property of Oxford Target Therapeutics.

#### Relationship with public officials

All Oxford Target Therapeutics OTT People engaged in business with governmental agencies must know and abide by the specific rules and regulations covering relations with such agencies. OTT People must also conduct themselves in a manner that avoids any dealings which might be perceived as attempts to influence public officials in the performance of their official duties. Oxford Target Therapeutics' OTT People shall deal in a professional, diligent, accurate, and ethical way with governmental agencies and public officials.

#### Bribery, fraud and corruption

Oxford Target Therapeutics does not tolerate bribery or corruption. OTT People should conduct their business in such a manner that ensures that Oxford Target Therapeutics' reputation will not be negatively affected.

#### Insider trading

OTT People are prohibited from buying or selling shares on the basis of material inside information which includes any information which OTT People acquire but which is not available to the public. OTT People are prohibited from communicating or relating insider information to other people for the purpose of buying or selling shares.

#### Data protection

Oxford Target Therapeutics will comply with the applicable data protection laws and regulations in countries where Oxford Target Therapeutics conducts business.

#### Confidential information

Oxford Target Therapeutics' proprietary and confidential information are of key importance to the company and as such, the safeguarding of such information is expected

Discrimination and human interactions

Oxford Target Therapeutics shall comply with all applicable employment laws in the conduct of its business and maintain an open, fair, and honest relationship with OTT People, external advisors and third parties.

All related decisions will be made regardless to race, religion, gender, sexual orientation, national origin, age, disability, marital status, or other classification protected by applicable law.

Oxford Target Therapeutics will not tolerate harassment of any kind

Health and safety

Oxford Target Therapeutics is committed to operate in a manner that is environmentally responsible and ensures the protection of the health and safety of OTT People and the public.

Oxford Target Therapeutics conducts business in accordance with applicable health and safety.

The Code of Conduct may be revised at any time by the Board of Directors of Oxford Target Therapeutics.

Adopted by the Board of Directors.....