



CODE OF ETHICS AND CONDUCT

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Should there be any conflict or incoherence between the English and Spanish versions, precedence will be given to the original Spanish version.



REVIEW SHEET

REVIEW No.	DATE	BY	DESCRIPTION OF THE MODIFICATION
01	29/07/2016	ORYZON	Creation of Code of Ethic and Professional Conduct
02	24/07/2023	ORYZON	<p>Article 1: updating of the new denomination of the Securities Markets and Investment Services Act.</p> <p>Article 6: incorporation of the novelties introduced by the Equality Laws enacted in 2022 and 2023.</p> <p>Article 15: adaptation to the provisions of Oryzon's Internal Code of Conduct in the Securities Markets.</p> <p>Article 22: adaptation to the provisions of Law 2/2023, of 20 February, on protection of persons who report regulatory breaches and the fight against corruption.</p> <p>Note vi: addition of definition of concrete information (Law 6/2023 of 17 March on Securities Markets and Investment Services).</p>

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CODE OF ETHICS AND CONDUCTⁱ

Chapter I. Purpose and Sphere of Application

Article 1: Purpose

1. It is the hope of Oryzon Genomics, S.A. (henceforth “**Oryzon**”, the “**Company**” or the “**Firm**”) that their conduct, along with that of the persons associated therewith, shall respond and adapt, not only, to the current legislation and their internal regulations, but also to the highest ethical standards and principles of social responsibility.

2. The purpose of the Oryzon Code of Ethics and Conduct (henceforth the “**Code of Ethics and Conduct**”, the “**Ethical Code**” or the “**Code**”) is to formalise the Company’s commitment to the principles of business ethics and transparency in all of their spheres of action, establishing a set of principles and guidelines directed towards guaranteeing the responsible and ethical behaviour of all of the persons covered hereby (henceforth the “**persons concerned**”) in the performance of their duties.

3. The present Ethical Code forms part of the Company’s Corporate System of Governance and the drafting hereof has incorporated the changes that have been introduced to the existing legislation, in particular with regard to Spanish Capital Companies’ Law and Securities Market and Investment Services Law, as well as the recommendations of the Spanish Code of Good Governance for Listed Companies, which was approved in 2015 and revised in 2020 by the Spanish National Securities Market Commission, and the provisions of the Company’s internal rules, along with the voluntary agreements signed thereby.

Article 2: Scope of Application

1. The present Code is applicable to all of those persons that provide their professional services in the name of, and/or on behalf of Oryzon, independently of their level in the Company’s hierarchy, their geographic or functional location, and in particular to:

- Presidency and Top-Level Management.
- Members of the Board of Directors.
- Members of Company Boards and Committees, of any kind, constituted within Oryzon.
- Members of the steering boards or committees.

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- Employees of Oryzon, including trainees and interns, as well as agents and freelance or subcontracted personnel that act, whether directly or indirectly, under the authority of Oryzon.
2. Compliance with the Code shall also be promoted among suppliers, collaborators or external associates, with regard to such operations and/or service provisions that they undertake with Oryzon.
 3. Compliance with the Code must be understood, without detriment to additional compliance with any of the applicable standards, whether internal or external, along with the Company's System of Corporate Governance and, in particular, with the Internal Rules of Conduct of the Spanish Stock Market, along with the Implementing Rules thereof.

Chapter II. Ethical Principles

Article 3: Vision and Values and General Principles

Visión and Values:

1. The Company's vision is as follows:

"To become a leading company at an international level in the field of epigenetic medicine and in the development of therapeutic solutions for cancer and neurodegenerative disorders."

2. The Company's vision, which is framed within the list of activities outlined in the company purpose and forming an integral part of the social and research side, is sustained by seven corporate values that represent Oryzon's firm commitment to improving the quality of human life by improving the therapeutic capacities of the treatment of the above-mentioned illnesses. These corporate values are:

Commitment, Ethics, Innovation, Investment, Quality, Cooperation and Equality of Opportunities.

General Principles

1. The Oryzon values are translated into principles that must govern the actions of the persons concerned, which are as follows:

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- a) Compliance with the legislation and the protection of human rights, particularly with regard to the protection of life and freedoms, equality of opportunities, non-discrimination and the values of each culture.
 - b) The employment of knowhow and skills for the improvement of wellbeing, always within the sphere of the existing legislation, and particularly with regard to epigenetic medicine and the biotechnological sector.
 - c) Loyalty to the Company and integrity in the safeguarding of the Company's interests.
 - d) Social responsibility with regard to both the Company's interest groupsⁱⁱ and sustainable development. The rights of human beings subject to investigation must be respected and their interests must prevail over those of science, society or the Company itself.
2. The standards of ethical conduct that must be complied with by the persons concerned, in the sphere of their responsibilities within the company, are derived from these ethical principles.
 3. The present Code does not cover all possible situations, rather it establishes the criteria required as a guideline for the ethical and responsible conduct of the persons concerned.

Chapter III. Standards of Conduct

Article 4: Legal Compliance and Collaboration with the Authorities

1. The persons concerned must comply with the law, independently of the position that they may occupy, their function or the country in which they operate, and must avoid any conduct that might be detrimental to the Company's reputation or might have adverse consequences for the Company's business or image.
2. Moreover, the persons concerned must also comply with the regulations of the Company itself, with the Company's policies, Codes and the procedures arising therefrom, with any voluntary agreements drawn up by the Company plus the commitments taken on by Oryzon on the basis of their contractual relationships with third parties.
3. The persons concerned must abstain from engaging in any type of activity that may require a special licence should they not have that licence, and must also abstain from the movement, whether directly or indirectly, of any kind of merchandise, goods or services should such not comply with the customs regulations applicable thereto.

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4. The persons concerned will collaborate with administrative and judicial authorities in inspections and investigations, or any requirements related to the Company.
5. Moreover, the persons concerned must also assume and comply with the administrative and judicial resolutions with regard to the repair or reduction of such damages as may be caused by the Company's activities.

Article 5: Human Rights and Freedoms

1. The persons concerned will respect and protect the human rights and freedoms recognised by the Universal Declaration of Human Rights and in the Global Compactⁱⁱⁱ. In addition, the persons concerned will also be governed by the principals gathered together in the Universal Declaration on the Human Genome and Human Rights, as well as the European Convention for the Protection of Human Rights and the dignity of human beings with regard to the applications of Biology and Medicine.
2. In particular, the persons concerned will reject child labour, and forced or obligatory labour, and will undertake to respect freedom of association, collective bargaining and the rights of minorities.
3. The persons concerned will ensure that any overseas citizens that have been taken on, in the name and on behalf of the Company, or that have finally provide services for the Company, will be provided with the necessary legal documents allowing them to remain in Spain and will apply the official form in letters of invitation to provide access to overseas customers, suppliers or other third parties in Spain, expressly prohibiting any inadequate use of those forms or procedures to that end.

Article 6: Equality of Opportunities and Non-Discrimination

1. Those persons concerned must be treated with respect and teamwork will be favoured.
2. The persons concerned will promote equality of treatment between men and women, trans and LGTBI persons particularly with regard to access to employment, training, professional promotion and work conditions, always insofar as such may fall within the competence thereof.
3. The persons concerned will abstain from carrying out any conduct or action (including through the internet, telephone or any information and communication technology) that is, whether directly or indirectly, representative of any kind of humiliation, belittlement, discredit, discrimination, abuse or offence or violence on

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grounds of sex, gender identity, gender expression, sexual orientation, race, ethnicity, religion, nationality, social origin, family situation, age, marital status, trade union membership, ideology, illness, disability or whatsoever other personal, physical, family or social condition or any other behaviour prohibited by law, that might imply or favour the establishment of a climate of aggression or intimidation and which causes or is likely to cause physical, psychological, sexual or economic harm, particularly with regard to conducts involving workplace or sexual harassment.

4. The persons concerned will respect the family life of the persons under their authority and will enable them to take advantage of the conciliation measures provided by the Company.

Article 7: Health and Safety in the Workplace

1. Oryzon must undertake their activities within a framework of maximum safety with regard to both persons and installations.

2. Persons concerned must observe, with special attention, the regulations governing health and safety in the workplace, along with any other measures implemented to that end, the purpose of which is the prevention or minimisation of risks in the workplace.

3. Moreover, the persons concerned must also ensure that they use the equipment assigned thereto in a responsible way and must advise their superiors with regard to any possible ineffectiveness or unsuitability in relation to the safety measures implemented, the protection equipment placed at their disposal or any other circumstances that might have an effect on their health and safety.

4. The persons concerned will have to be aware of the dangers of the products that they handle, particularly with regard to questions of health and environmental protection. Moreover, those persons that handle explosive, toxic, corrosive, ionising, chemical or, and in particular, dangerous substances are mandatorily and inexcusably bound to comply with the specific safety measures established for such products and must be specifically trained and aware of the requirements for the handling thereof.

5. The Company must provide the pertinent training courses, including such updates thereon as may prove necessary. Training will be both generic, in terms of the workplace risks to which persons are exposed in the performance of their work, and specific in terms of the treatment and handling of the noxious substances referred to above, or any other that may be required with regard to a specific work position.

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Article 8: Environmental Protection

1. Oryzon undertake their activities with absolute respect for the environment, in compliance with and, should such be the case, improving the standards established in the applicable environmental regulations and minimising, as far as such is possible, the impact of their activities on the environment.
2. As a result thereof, the persons concerned, will have to foster the reduction of contamination in such a way that their actions are channelled towards the lowering of emissions and spillages and a reduction in the levels of waste generated.

Article 9: Reliability of Information and Accounting Records

1. The persons concerned will make sure that all of the Company's transactions are shown in the accounting books with absolute clarity and precision, and that the economic-financial information, particularly with regard to the Company's annual accounts and financial statements, faithfully reflects their economic, financial and assets situation, pursuant to generally accepted accounting principles and the international regulations with regard to financial information applicable thereto.
2. In particular, the persons concerned will abstain from:
 - a) Establishing accounts that are not registered in the books.
 - b) Registering operations that have not taken place.
 - c) Consciously assigning operations in a mistaken way.
 - d) Reflecting expense entries with an incorrect indication of the purpose thereof, or the registering of non-existent expenses.
 - e) Using false documents and deliberately destroying accounting documents prior to the finalisation of the legal term set aside to that end.

Article 10: Fraud, Money Laundering and Payment Irregularities

1. In financial and trade transactions the persons concerned will have to pay special attention to those situations in which there are indications of illicitness on the part of the persons or entities with which the said transactions took place, so as to avoid any fraud or money laundering that may result from illicit activities^{iv} and payment irregularities, and will have to abstain from providing, facilitating or concealing money

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laundering operations of any kind, as well as denouncing whatsoever operation of this type that they may become aware of.

2. The cases of fraud to which special attention must be paid are as follows:

a) The obtaining of subsidies or grants from public administrations by falsifying the required conditions or by concealing conditions that might have prevented the concession thereof, whether in the adjudication phase or in the justification phase following assignment, or the application of such subsidies for purposes other than those for which they have been conceded.

b) Knowingly defrauding the Public Tax Office by evading the payment of taxes, retained amounts, revenues on account of payments in kind, the undue obtaining of tax returns or making undue profit from tax benefits. In this sense the persons concerned will have to scrupulously follow the Company's tax policy.

c) Knowingly defrauding the Social Security through the undue obtaining of returns, making undue profit from deductions and avoidance of the payment of quotas.

d) Knowingly defrauding the General Budgets of the European Union by avoiding the payment of sums due, the destination of funds thereby obtained to other purposes, or the falsification of the conditions for the obtaining or justification of funds.

Article 11: Gifts, Gratuities and Courtesies involving the Persons Concerned

1. The persons concerned may not offer, promise, make or accept, whether directly or indirectly, any gifts^v, gratuities, services or any other kind of favours, to or from any individual or legal entity, including such entities as may lack legal personality, and that might affect the objectivity thereof or have an illicit influence in any commercial, professional, judicial or administrative relationship.

2. Whatsoever gift, gratuity, courtesy service or favour received in contravention of the present Code will have to be rejected or returned. Any gratuities paid in cash are expressly prohibited and may not, under any circumstances, be either accepted or offered.

3. With regard to supply, associated or client companies, or any other company with which Oryzon may have any kind of commercial relationship, the persons concerned must act impartially and objectively, applying the criteria of quality and cost with regard to the purchase of products or services, avoiding any collision between their personal interests and those of the Company and establishing relations based on reciprocity, respect and mutual trust.

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Article 12: Bribery and Corruption

The persons concerned must abstain from:

- a) Offering, promoting, making or accepting payments in cash or in kind, or any other benefits, attentions or advantages to or from persons at the service of public or private entities, political parties, business or union associations, or persons who may be candidates for public office, or with the intention of obtaining, either from or through them, any business or other illicit advantage, whether for themselves or the Company.
- b) Offering, promoting, making or accepting payments that consist of the handing over of cash or any other goods of value in exchange for illicitly ensuring or expediting –ex ante, mid-term or ex post- the course of a process or an action before any body of the public administration or the legal system, or any official, national or international, body.
- c) Prevailing on or using any kind of personal relationship, whether direct or indirect, with a public officer or representative of authority, national or international, for the purpose of unduly obtaining, whether individually or for the company, whatsoever kind of unjustified benefit or advantage.

Article 13: Conflict of Interests

1. For the purposes of the present Code a conflict of interests is said to exist when the interests of a person concerned, when taking a decision, come into conflict with the interest of the Company, whether directly or indirectly, through the involvement of any associated person or third party that they may wish to favour.
2. Given a situation in which there is a potential conflict of interests, the person concerned will have to act in accordance with the principle of loyalty to the Company and must, in all cases, seek authorisation on the part of their immediate superior.
3. Persons that are associated must avoid situations that might represent a conflict of interests. Moreover, such persons must abstain from representing the Company and from intervening or having an influence on the taking of decisions in which, whether directly or indirectly, they or any person associated either with them or with any third party that they may wish to favour, have a personal interest, excepting should they be acting with a legitimate protected interest that enables them to do so. Moreover, such persons may not take advantage of their position in the Company to obtain equity or personal advantages or business opportunities, in violation of the internal regulation.

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4. The Members of the Board of Directors will be governed with regard to this aspect in a complementary manner, particularly with regard to the provisions of the Regulations of the Board of Directors.

Article 14: Professional Secrecy and Confidential Information

1. All information that is not in the public domain and that either belongs to or has come into the possession of Oryzon, whether such belong to the Company or to a third party, will in general be considered as reserved and confidential information, and will be subject to professional secrecy.

2. The persons concerned must maintain strict confidentiality and secrecy with regard to any reserved and confidential information to which they might have access through their work, and which may only be used for the purpose for which it was originally obtained. The revealing to, and use by, a third party of this type of information, without express authorisation to do so constitutes a lack of loyalty to Oryzon and, should it be the case, to the person concerned, whether directly or indirectly.

3. Moreover, the persons concerned may not make or attempt to make fraudulent use of such information, whether personally or through third parties, in order to obtain some kind of benefit for themselves, or for Oryzon, from such information as they may have access to, regardless of the circumstances.

4. The persons concerned must at all times use the security measures imposed by the Company that are the most suitable for protecting such reserved and confidential information from any risk of unconsented access, manipulation or destruction, whether such be intentional or accidental.

5. At the end of the working or professional relationship, the person concerned will have to return all of the information in their power, as a result of that work, to Oryzon, in particular such information as is reserved and confidential, regardless of how such have been kept, including any information stored in computer terminals, while the duty to confidentiality will in all cases continue to subsist.

Article 15: Operations involving Oryzon Securities

1. The persons concerned, who have access to such privileged information^{vi} and who know, or ought to know, precisely what kind of information it is, will be bound by the obligations, limitations and prohibitions established in the Oryzon's Internal Regulations regarding Conduct in Stock Market.

2. In particular, subject persons in possession of any kind of Inside Information:

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- a) They shall refrain from preparing or carrying out, directly or indirectly, for their own account or for the account of others, any type of transaction (including the acquisition, transfer or assignment) in the Company's Marketable Securities and Financial Instruments. The use of this type of information to cancel or modify an order relating to the Affected Security to which the Inside Information refers, when the order was given before the Inside Information became known, shall also be considered to be a Personal Insider Dealing. They must also refrain from the mere attempt to carry out any of the foregoing transactions.

The preparation and execution of transactions the existence of which in itself constitutes Inside Information, as well as transactions carried out in fulfilment of an obligation, which has expired, to acquire or dispose of such Transferable Securities and Financial Instruments, are exempted, when this obligation is provided for in an agreement entered into before the Person Subject or Insider came into possession of Inside Information or by a manager under a discretionary portfolio management contract entered into by the Person Subject, by their respective Related Persons or by an Insider, as well as other transactions carried out in accordance with the applicable regulations.

The delivery of shares or share options of the Company to Subject Persons who have Inside Information by virtue of an obligation that has already expired, within the framework of the remuneration systems approved by the Company and not in order to circumvent the prohibition on Insider Trading shall not be deemed to be included in this section.

- b) They shall not disclose such Inside Information to third parties except where this is necessary for the responsible exercise of their work, profession, position or duties, they are subject to a legal or contractual obligation of confidentiality, and they have confirmed to the Company that they have the necessary means to safeguard such Inside Information.
- c) . They shall not recommend or induce another to carry out transactions on the basis of such information or cause another to carry out such transactions on the basis of Inside Information (whether or not the person recommending or inducing the transactions knows, or ought to know, that the recommendation or inducement was based on Inside Information), whether it is an acquisition, transfer, assignment, cancellation or modification of orders in the Company's Transferable Securities or Financial Instruments
- d) In general, they shall comply with the provisions set forth in the applicable regulations and in Oryzon's Internal Code of Conduct for Securities Markets.

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3. Engaging in operations, or the spreading of information that provides false or misleading indications with regard to questions of offer and demand or the quotation of company stock.

Article 16: Protection of Personal Data

1. The persons concerned may not handle, assign, publicise or reveal any data of a personal nature that they have obtained or had access to as a result of their position, failing to comply with the regulations to that end.

2. Those persons concerned who, in the performance of their functions, have to deal with personal data will be obliged to know the applicable legislation with regard to this material and to safeguard the application thereof and compliance therewith. Moreover, they will also undertake to apply the security measures determined by the Company in order to ensure the effective custody of such personal data as they may obtain in the performance of their professional duties.

Article 17: Protection of Intellectual and Industrial Property

1. The persons concerned will have to respect and protect the intellectual and industrial property of Oryzon, represented, *inter alia*, by their patents, trademarks, research and development processes and information systems, utility models and industrial designs; and may not use them for specific ends or to transmit other technologies, trademarks, methodologies or any type of information that belongs to the company, even should such have been obtained and/or developed by the person concerned himself.

2. Likewise, the persons concerned must also, and at all times, respect the intellectual and industrial property rights of third parties and will undertake not to reproduce, plagiarise, distribute or publicly communicate any literary, artistic or scientific work, in whatsoever form, without the authorisation of the owners of the corresponding intellectual rights, or infringe the regulations and/or patent, registered industrial design and/or trademark rights, along with the guidelines for the use of third party marks.

Article 18: Use and Protection of Oryzon Assets and Information Systems

1. The persons concerned may only make strictly professional use of the company's assets and resources and must also take responsibility for the protection of such assets and resources as may be entrusted thereto due to their work, taking charge thereof with all necessary due diligence. Nevertheless, with the express consent of the Company Management, the persons concerned, determined internally and under the regulated

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conditions, may make personal use of mobile devices, insofar as it is the case that the moderate use thereof does not in any way infringe the stipulations of the other Articles of the present Code.

2. The persons concerned may not, in whatever case, destroy, alter, render useless or damage, or in any way illicitly access any data, programs or documents belonging to Oryzon or to any third parties.

3. The persons concerned must avoid taking any actions that may be detrimental to the IT systems of the Company or those of third parties and may not access any external computers or systems without having received express authorisation to do so.

4. In no case may the persons concerned make use of the equipment that Oryzon place at their disposal for the installing or downloading of applications or contents, the use of which is illegal or might damage the Company's reputation, or place in danger the security of the data to which they have access, and they must refrain from using, downloading or installing any software without the prior authorisation of the IT Systems Management and moreover,, where required, obtaining the corresponding licence.

5. The persons concerned will not make use of any of the Company's funds or cards for payments that are not related to their professional activity.

6. Likewise, the persons concerned may not remove, or deliberately consent to other persons removing, resources, goods, effects and assets of any kind^{vii} that have been entrusted thereto as a result of their work position.

7. Neither may the persons concerned alienate, transfer, assign or conceal any property, owned by Oryzon, in order to avoid compliance with possible responsibilities towards creditors.

Article 19: Transparency of Information and Fair Competition

1. The persons concerned undertake to promote informative transparency at both an internal and external level, particularly with regard to the Company's interest groups.

2. The persons concerned will safeguard the veracity, accuracy, integrity and precision of the information that they provide to their collaborators, partners or third parties with regard to the characteristics and conditions of the products and the services provided and/or offered and must respect the principle of transparency with regard to considerations, in cash or otherwise, along with any other product or service conditions.

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3. The persons concerned may not draw up any misleading advertising in relation to the activity of the Company and must avoid any kind of conduct that might constitute an abuse or illicit restriction of competition.

4. The persons concerned must reject any information related to the Company's competitors, or any other company, that has been obtained as a result of a previous employment, the performance of their professional functions, or any other means that is either improper or that infringes the confidentiality of the legitimate owners of such information. Moreover, they must also avoid spreading any malicious or false information about those companies that are competitors of the Company.

Article 20: Relations with Interest Groups

1. The persons concerned will undertake to foster cooperation and dialogue with the Company's interest groups and to maintain relationships with them that are both transparent and fluid.

2. Moreover, the persons concerned will also have to comply with the principles of honesty, impartiality, respect, trust and integrity, and will be bound to ensure that no action taken thereby could be susceptible to interpretation as misleading and detrimental to any shareholders, partners, collaborators, suppliers or third parties. And, in particular, nobody may, in the name of Oryzon, promote or transmit false expectations with regard to the curing of any kind of illness or disease, or generate false needs related to health or to any study that is being carried out, or is going to be carried out, by the Company.

3. Only those persons that have, for each occasion, been expressly authorised by Oryzon may negotiate, draw up contracts or enter into business deals in the name and on behalf of the Company.

4. The relations that Oryzon establish with any public or official body, or with the representatives thereof, must be governed by the principles of institutional respect, collaboration, legality and ethics, and in consequence must comply with the resolutions arising therefrom.

Article 21: Donations, Social Projects, Participation in Courses and Seminars

1. The persons concerned must ensure that any donations made in the name of the Company comply with the following requirements:

a) That they have previously been given the corresponding internal authorisations.

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- b) That such are granted in favour of entities of acknowledged prestige and with an organisational structure that guarantees the correct administration and disposition of resources, and that they operate in a fully legal way.
 - c) That they be faithfully reflected in the Company's accounting books on the basis of a due receipt for the hand-over, issued by the receiver.
 - d) That such are not used as a means to conceal an undue payment or bribe.
 - e) That such have not been granted in favour of any political party or business or union organisation, or the representatives thereof, or any intermediary persons, excepting in those cases for which provision is expressly made in the applicable legislation.
2. To the extent possible, the persons concerned will continue to monitor the progress of donations that have been made, in order to ensure the correct use thereof.
3. The participation of the persons concerned in courses, seminars and events will require a pertinent prior authorisation.

Chapter IV Non-Compliance, Supervision and Penalty System

Article 22: Non-Compliance

1. The persons subject to the Code of Ethics play a fundamental role in protecting the integrity of Oryzon and must, therefore, immediately report through the Internal Reporting System or Ethics Channel the following actions or omissions or any violation of the Ethical Code that may affect them personally or of which they have become aware of:
2. (A) any act or omission which may constitute an infringement of European Union law, irrespective of how such acts or omissions are classified under national law, or which could affect the financial interests of the European Union.
3. B) Actions or omissions which may constitute a serious or very serious criminal or administrative offence. In any event, this shall include all serious criminal or administrative offences involving financial loss for the Public Treasury and Public Security.
4. C) All potentially significant irregularities, including financial and accounting irregularities that may involve liability for ORYZON and conduct contrary to the law and to the principles and rules of conduct established in ORYZON's Code of Ethics and Conduct, and

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D) Information on any type of harassment.

1. Likewise, the **Audit and Compliance Committee** or the **Delegated Compliance Committee** may also act on their own account, without the need for any communication or report to be filed therewith, should they become aware of any conduct or action that might constitute some form of non-compliance with the present Code.
2. Those persons associated with any such case must provide the collaboration required of them by the **Audit and Compliance Committee** or the **Delegated Compliance Committee** for the adequate exercise of their functions.
3. Nobody, independently of their level within the Company's hierarchy is authorised to demand that any other person commit an illegal act or contravene that which is established in the present Code. No person concerned may justify any conduct that is improper, illegal or contrary to the Code on the basis that they received orders to do so from above, were unaware of the said Code or alleging that they were acting in the best interests of the Company.

Article 23: Supervision

1. The Audit and Compliance Committee is responsible for ensuring and interpreting compliance with the Ethical Code, and also of dealing with the reports regarding such possible infringements thereof as may be presented. However, the Audit and Compliance Committee may delegate these functions either to the Delegated Compliance Committee or to an external body, in order that such reports be pursued independently and impartially, guaranteeing the confidentiality of the whistleblower.
2. The Audit and Compliance Committee is also responsible for ensuring that those persons who, in good faith, have reported any assumed non-compliances or infringements will not be subject to reprisals or threats of any kind, as well as to the safeguarding of confidentiality in the cases that they process. The Audit and Compliance Committee may also deflate these guarantees to the Delegated Compliance Committee.

Article 24: Penalisation System

1. The infringement of the Ethical Code constitutes a violation and will be subject to such disciplinary measures as the Management of Oryzon may deem appropriate, or as provided for in the labour regulations, the collective employment agreement or the existing Spanish legislation, as the case may be.

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2. The attribution of false accusations made either recklessly or untruthfully, or in order to prejudice any other person, or the Company itself, may result in either penal or civil liability, as provided for in the existing legal system.

Chapter V Promotion, Effect and Approval

Article 25: Promotion

1. The Audit and Compliance Committee must promote awareness and knowledge of the Ethical Code and will propose such means as they may consider opportune to ensure the effective application hereof.
2. Oryzon must promote the spreading of the present Code among its various groups of interest and among society in general, *inter alia*, via the Company's webpage.

Article 26: Effect and Approval

1. This Ethical Code, along with any successive modifications hereto will come into effect immediately, on receiving the approval of the Board of Directors.
2. The present Code will be revised and updated at regular intervals, in order to adapt it to any new regulatory requirements or changes in the Company's needs and will, in whatever case, be reviewed on an annual basis.

Definitions and Explanatory Notes

- i. Excepting in those cases in which the understanding of the text so requires, all references to the contents of the present Code in which the masculine singular is used, as a common denominator, refer indistinctly to all persons, whether they be men or women, and are so used in order to avoid needless reiteration of the terms and to simplify the reading.
- ii. "Interest groups" must be understood as groups that have a shared interest in, or connection with, the activities of an organisation, or that are affected by the actions taken thereby. The most important interest groups related to Oryzon, as defined in the Principles of the Company's Corporate Responsibility, are:
 - a) In the internal sphere: employees, shareholders, clients/partners and suppliers.
 - b) In the external sphere: the biotechnology sector, the education and research community, public administrators along with sector, social and cultural organisations.
- iii. The Global Compact is a voluntary initiative, fostered by the United Nations Organisation (UNO), in which companies undertake to favour the establishment of the fundamental values indicated in the ten universal principles, accepted in the field of human rights, labour relations, environmental protection and Anti-Corruption. Oryzon has signed up for the Global Compact.

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- iv. The following, *inter alia*, are some of the transactions to which special attention needs to be paid:
- a) Cash payments that are unusual due to the nature of the transaction, payments by cheque made out to bearer and payments made in currencies other than those specified in the contract, agreement or invoice.
 - b) Payments made to/by third parties that are not named in the corresponding contract or agreement.
 - c) Payments made to or from accounts that are not the usual accounts for transactions undertaken with a certain person or entity, always insofar as the destination of the transferred funds is not known.
 - d) Payments made to persons or entities resident in tax havens, or to bank accounts opened in the branches of banks located in tax havens.
 - e) Payments made to entities in which, because of their legal framework, it is not possible to identify either the partners therein or the final beneficiaries thereof.
 - f) Extraordinary payments not anticipated in the contracts or agreements.
- v. For the purpose of application of the present Code, acceptable “Gifts, Gratuities and Courtesies” are considered to be those that comply with the following requirements:
- a) That their purpose is not to obtain some kind of benefit in exchange.
 - b) That they be handed over or received in accordance with a generally accepted commercial or social practice.
 - c) That they consist of objects or details with a merely symbolic value or economically irrelevant value (in general having a value of less than 150 Euros).
 - d) That they are permitted by the legislation of the country involved, by generally accepted commercial practices and by the ethical principles of the culture of both the giver and the receiver.
- vi. Pursuant to the provisions of Article 226 of Securities Markets and Investment Services Law of 17 March 2023, in connection with Article 17 of Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014, any information that meets the following requirements is considered inside information:
- a) Is of a specific nature, i.e., relates to a set of circumstances which exists or which may reasonably be expected to come into existence, or to an event which has occurred or which may reasonably be expected to occur, provided that such information is sufficiently specific to allow some conclusion to be drawn as to the effects which those circumstances or that event might have on the prices of the securities concerned.
 - b) Refers, directly or indirectly, to one or more of the affected securities.
 - c) That it is not in the public domain.
 - d) That, should it be made public, could have an appreciable effect on the value of the affected securities. It is considered that a piece of information could appreciably influence the quotation if a reasonable investor could use it as part of the basis for their investment decision making.
- vii. Such assets may be physical or not, moveable or immovable, tangible or intangible, along with such legal documents or instruments that accredit ownership or any other rights over such assets.

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