



ATLAS ANTIBODIES GROUP PARTNER CODE OF CONDUCT

INTRODUCTION

To reach our vision *"For every therapeutic discovery to be enhanced by solutions from our Group"* we aim to act responsibly and build trust in every aspect of our business. The safety and integrity of our customers, employees and partners are vital, and the quality of our products is of the highest priority.

Through our expertise and unique heritage, we provide high-quality, innovative solutions to researchers worldwide. This enables groundbreaking medical discoveries, better diagnoses, and improved patient outcomes.

To be able to achieve our vision and stay true to our mission, in our daily business and through our operations we comply with ethical guidelines such as the International Bill of Human Rights, The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, The OECD Guidelines for Multinational Enterprises and the United Nations Global Compacts in which we participate. Beyond the ethical dimensions our partner requirements are specified in agreements.

THE PURPOSE OF OUR PARTNER CODE OF CONDUCT

We strive to build long-term and stable relationships with all our partners and suppliers. We promote responsible business, and we expect our partners (suppliers, contractors, agents, distributors, representatives, joint ventures, licensing partners) to comply with all applicable laws and relevant international standards, conventions and declarations. The purpose of this Partner Code of Conduct is to clarify our requirements and to establish a common understanding of expected behaviors and ethical principles aligned with Atlas Antibodies group corporate values and culture.

This code is part of all contractual and partner relationships, and we will work in dialogue with our partners to ensure they accept, support and follow the principles outlined here as we expect them to adhere to this Code of Conduct as part of our commitment to ethical business practices. Atlas group will assess new partners prior to contract and may conduct reassessment of existing partners to ensure standards are met.

Sustainability is a key element of Atlas Antibodies Group values and is integrated into our business strategy. We view partners as collaborators in success. Atlas Antibodies group has a CO2e emission target of lowering our scope 1 & 2 emissions by 50% by 2030* and our scope 3 emissions by 30% **.

This code of conduct is not intended to create new or additional rights, but to ensure we build our Partnership on a common ethical standard on how we act and conduct our business.

Dan Pitulia,
CEO
Stockholm, Sweden
September 2025

*Base year 2016 ** base year 2022

COMMITMENTS

Legal compliance and anti-corruption

Atlas Antibodies Group expects all our partners to operate in strict compliance with applicable international, national, and local laws, regulations, and industry standards. Partners shall be committed to complying with all applicable export, import and economic sanction laws and regulations (which are commercial and financial penalties imposed by one or more countries, and targeted against a country, organization, group, or individual). Ensuring that their sub-contractors and other partners are compliant with the code. We are committed to conducting business with a high level of integrity and fair competition, preventing corruption in all forms, including bribery and facilitation payments.

Partners shall:

- Conduct business in accordance with all laws related to bribery, including UN convention against corruption and any other applicable local laws and will not in any form engage in any kind of bribery.
- Avoid all forms of corruption, bribery, extortion, or embezzlement, illegal payments or kickbacks or any other form of questionable inducements to influence any business transactions. Directly or indirectly, including through intermediaries.
- Not offer, promise, or give any undue advantage—monetary or otherwise—to any public official or private party for the purpose of obtaining or retaining business or gaining an improper advantage.
- Avoid conflicts of interest as well as appearance of any situation that could constitute a conflict of interest. Act to promote fair competition in accordance with applicable competition laws and regulations and implement systems to prevent competition law infringements.
- Have well established internal policies and controls to prevent unethical conduct and ensure transparency, including accurate books, records, and accounting practices.
- Not be part of money laundering, which is the illegal process of making large amounts of money generated by a criminal activity, such as drug trafficking or terrorist funding, appear to have come from a legitimate source.
- Immediately report, to their designated contact, any suspected or actual incidents of corruption, fraud, or legal violations that may affect their relationship with Atlas Antibodies Group.

Contractual partners are expected to ensure their employees, subcontractors, and suppliers are trained and monitored for compliance with these standards.

Human and Labour rights

Respecting and promoting human and labour rights are an essential part of our, our partners' and third-party suppliers' operations. All suppliers are expected to respect and support the protection of human and labour rights in accordance with The United Nations Guiding Principles on Business and Human Rights (UNGPs), The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and The OECD Guidelines for Multinational Enterprises.

Partners shall support and respect the protection of internationally adopted human and labour rights including:

- Ensure no child labour is used. In accordance with local law, the UN convention on the rights of the child, the international labour organizations (ILO) or national regulations, ensuring the most stringent applicable legal standard is employed.
- Prohibit all forms of forced or compulsory labour, including modern slavery and human trafficking.
- Not use or source conflicted minerals or metals in areas affected by conflict or in mines that rely on forced or child labour in any of their products, manufacturing processes.
- Respect the freedom of association and collective bargaining by protecting the right of workers to form and join trade unions and to bargain collectively.

- Ensure that working hours, pay, compensation and terms of employment are fair and reasonable. Suppliers must, at a minimum, comply with local laws, industrial standards and collective agreements.
- Ensure non-discrimination, dignity, and equal treatment in all aspects of employment and operations.
- Respect diversity by ensuring a work environment free from harassment, discrimination and abuse.
- Provide a safe and healthy work environment by assessing risks and minimizing any negative impact, ensuring all employees are protected from exposure from health and safety hazards, ensuring relevant and functional personal protective equipment is provided to all employees. Taking appropriate actions to prevent and report any workplace accidents and illnesses.
- Provide workers with internal grievance mechanisms that allow employees to in strictest confidentiality raise concerns, report incidents, complaints, violations that are transparent, unbiased and anonymous without fear of retaliation.

Environmental Responsibility

We are committed to protecting the environment and together with our partners we strive to improve our environmental impact and contribute to a more sustainable world.

Our partners shall:

- Comply fully with all applicable environmental, health and safety- laws and regulations, including those related to emissions, waste management and chemical handling.
- Actively work to minimize their environmental footprint by implementing sustainable practices when possible. This includes, but is not limited to, reducing greenhouse gas emissions, conserving energy and water, minimizing waste, and promoting the use of renewable and eco-friendly materials.
- Identify hazardous materials, chemicals and substances to ensure safe handling, storage, recycling, reuse and disposal to monitor, minimize and prevent pollution.
- Constantly strive to use water, energy and materials responsible with focus on reducing any negative environmental impact.
- Work to enhance the scope and quality of data provided for the products and services provided, increasing transparency on resource use and emissions.

Animal Welfare and research ethics

Animal welfare is a core ethical priority for Atlas Antibodies Group. Partners involved in animal-related activities shall;

- Treat animals with respect and care, ensuring their physical and psychological well-being.
- Provide species-appropriate housing, nutrition, environmental enrichment, and veterinary care.
- Avoid any procedures or conditions that may cause unnecessary pain, suffering, or distress.
- Comply with all relevant animal welfare legislation (including but not limited to the EU Directive 2010/63/EU on the protection of animals used for scientific purposes and the FELASA) and be open to audits and inspections.
- Keep records of compliance with animal welfare legislation applicable in their country.

Partners engaged in research on behalf of, or in collaboration with Atlas Antibodies Group shall ensure that all research complies with and is ethically and scientifically reviewed according to relevant laws, regulations and international standards.

Protection of information

We care about our partners, customers and third-party suppliers' integrity are committed to ensure safety for information processing and personal data.

Partners shall;

- Protect personal data from unauthorized access, destruction or unauthorized usage by complying with local laws and regulations, such as but not limited to EU's General Data Protection Regulation (GDPR).
- Safeguard and protect confidential, proprietary and personal information as well as intellectual property by applying sufficient technical security measures to protect and safeguard access to such information.
- Handle sensitive information, including intellectual property and proprietary information in a manner that protects intellectual property rights. Complying with all applicable laws, governmental property rights, including patents, copyrights and trademarks.

Monitoring & Compliance Enforcement

Atlas Antibodies Group requires partners to fully cooperate with compliance assessments; monitoring should be conducted in collaborative manner throughout our contractual relationship.

Upon request partners shall provide documentation supporting compliance with the code, and controls are primarily done by self-assessments, but may include on-site audits, facility inspections, document reviews, and employee interviews. These assessments, in relation to activities relevant for this code of conduct may be conducted by Atlas Antibodies Group or by authorized third parties.

Corrective action plans shall be implemented without delay if any non-compliance, deviation, or breach of this Code of Conduct is identified. Partners are expected to work together with Atlas Antibodies group in a collaborative manner to address root causes, prevent recurrence, and provide documented evidence of remediation.

Repeated, systemic, or severe violations of this Code, especially those involving human rights, corruption, or environmental harm may be considered as material breach of this code of conduct, which may constitute a breach of contract under the main agreement between the partner and Atlas Antibodies Group entitling Atlas Antibodies group to endorse remedies specified therein.

Partners are required to promptly report any suspected violations of this code-of conduct. Any concerns or questions about ethical misconduct or suspected possible violations should be communicated to either your direct contact at Atlas Antibodies Group, or through our whistleblowing channel available on our website. www.atlasantibodies.com as well as at www.evitria.com and www.histocyte.com The whistleblowing channel is anonymous to protect whistleblowers.

By entering partnership with Atlas Antibodies Group, all partners acknowledge the requirements and ethical principles outlined in this Code of Conduct.

SOURCE INFORMATION

Information source	Document title and description
International bill of human rights	International Bill of Human Rights OHCHR
Declaration of fundamental principles and rights at work	ILO 1998 Declaration EN.pdf
The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct	OECD Guidelines for Multinational Enterprises on Responsible Business Conduct OECD
United Nations Global Compacts	Homepage UN Global Compact
EU Whistleblowing directive	Directive - 2019/1937 - EN - eu whistleblowing directive - EUR-Lex