

WIT Pharma Limited Liability Company

Code of Business Conduct

APPROVED by the General Director of WIT Pharma LLC, D. F. Klimchuk; approval date 15 January 2026.

This Code of Business Conduct (the “Code”) sets out the ethical principles and standards that WIT Pharma LLC (the “Company”), its employees and associated experts follow in conducting business and interacting with clients, partners, regulators and society.

1. Compliance with law

The Company and its employees act in strict compliance with the applicable law of the Russian Federation and of the jurisdictions in which they operate, as well as applicable international standards.

2. Anti-corruption

The Company has zero tolerance for corruption in any form. Bribery, commercial bribery, illegal payments and other acts breaching anti-corruption law are prohibited. Detailed requirements are set out in the Company’s Anti-Corruption Policy.

3. Fair competition

The Company supports fair competition, complies with antitrust law and does not use unethical or non-transparent practices to gain an advantage.

4. Conflict of interest

Employees avoid situations where personal interests conflict, or may conflict, with the interests of the Company or its clients, and disclose such situations to management in a timely manner.

5. Confidentiality and data protection

The Company safeguards the confidential information of clients and partners and processes personal data in accordance with applicable law. The Company is ready to enter into non-disclosure (NDA) and data-processing (DPA) agreements.

6. Human rights and non-discrimination

The Company respects human rights, ensures equal opportunity and does not tolerate discrimination or harassment in any form.

7. Health and safety

The Company maintains safe working conditions and cares for the health and well-being of its employees.

8. Gifts and hospitality

Business gifts and hospitality are acceptable only within reasonable limits, must not influence decisions and must comply with applicable law and the Company’s internal policies.

9. Reporting violations

Violations of this Code or of applicable law should be reported promptly to info@witpharma.com. The Company guarantees no adverse consequences for those who report in good faith.

General Director, WIT Pharma LLC

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Approved document. The original bearing signature and seal is available on request.