

# Ethics and Anti-Corruption Policy Statement

Saavsus, Inc. is committed to upholding the highest standards of ethical and lawful conduct. In keeping with this commitment, all employees, science consultants, sub awardees, and stakeholders, both in and outside the United States, are strictly prohibited from engaging in any type of corrupt activity, including unlawful bribery of a government official or private person in connection with Saavsus activities. This prohibition extends to persons acting on the company's behalf, including agents, attorneys, and consultants. All those identified in this paragraph are governed by this policy.

Compliance with this policy has three major components:

- Refusing to engage in any actual or attempted corrupt activity; and promptly reporting the circumstances to the person's direct supervisor or other company official with management responsibility for the subject activity;
- Recognizing and appropriately addressing situations that may involve corruption; and
- Ensuring that transactions, activities, and payments are approved, documented, and processed through routine company channels.

Each individual covered by this policy must refuse to participate in any attempt to bribe or make any other improper Payment (as defined below) to a public or private person in connection with a company activity. This includes, as examples only: (i) offering or providing a Payment to a government official to rule favorably on an application for tax exemption or a permit, registration, or license; (ii) making a Payment to a private person or official who has responsibility for awarding or influencing the award of a grant, contract, or gift; (iii) reimbursing an official for personal expenses other than as part of bona fide, documented company activity or project in accordance with Saavsus expense policies; and (iv) providing any Payment to a consultant, agent, or other person to enable any of the foregoing or other corrupt activities.

In addition, individuals covered by this policy are expected to recognize and appropriately address situations that raise corruption concerns, or so-called "red flags." Red flags include, but are not limited to:

- A history of corruption in the country.
- An unusual payment pattern or financial arrangement.
- A party's refusal to agree in writing not to violate applicable anti-corruption laws.
- Lack of transparency in expenses and accounting records.
- Apparent lack of qualifications to perform the services offered.
- Proposed selection of a vendor or service provider based on the recommendation of a governmental official or other person with responsibility for or influence over the award of a grant, contract, or gift.

Selection of a vendor or service providers requires closer scrutiny into the planned activities but does not necessarily prohibit going forward after the company department, working with appropriate Saavsus resources (as referenced below), confirms that the planned activities will be lawful and in keeping with Saavsus requirements of ethical conduct.

All proposed contracts and transactions for grants, contracts, and gifts should go through routine appropriate channels within Saavsus and have a documented legitimate purpose. Legitimate purposes may include, as examples only, making fair payment for services actually provided or for hosting research activities in accordance with Saavsus practices.

Saavsus will maintain accurate and current financial records of its transactions and projects. Expenses and payments must never be hidden or purposefully misclassified. In addition, each project manager or Principal Investigator should have sufficient knowledge of its vendors, agents, consultants, and collaborators in any transaction or activity to reasonably assure that there is a common commitment to principles of lawful and ethical conduct, including compliance with anti-corruption laws. For new relationships, this often involves due diligence on service providers, agents, and other participants, particularly in countries with a history of corruption or where a provider, agent, or participant has been recommended by government officials.

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment.

Compliance with anti-corruption laws and policies can be complex. and Saavsus has a variety of resources to help. The President of Saavsus, with guidance from the company's Counsel, has overall responsibility for oversight and implementation this policy. Any instances where a corrupt Payment has been requested by a private or public official should be reported to a person's direct supervisor or other company official with management responsibility for the subject activity

#### Definitions

- Payment – Paying, offering, promising to pay, or authorizing to pay or offer money or anything of value with the intent to induce improper behavior. "Anything of value" can include services, gifts, lavish meals, entertainment, travel expenses, favors for family or acquaintances, or the uncompensated use of company facilities or property.
- Corruption – Activities taken to induce an official or private person to misuse his or her authority, such as inducing the person to take any improper action or to refrain from taking appropriate actions.