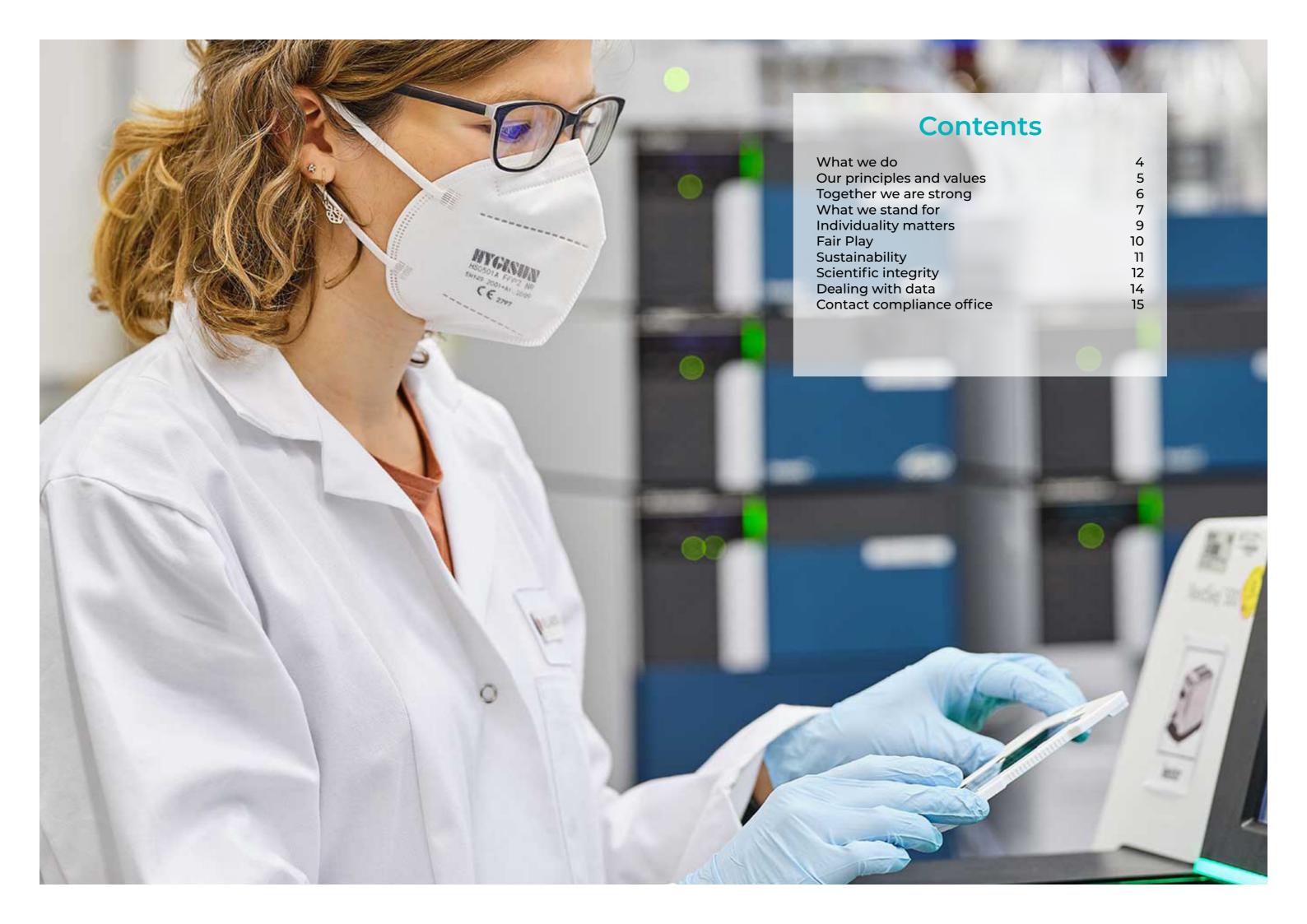


How we work How we are Our business practices

OUR CODE OF CONDUCT



What we do

Xlife Sciences AG is a life sciences incubator and accelerator: our mission is to build a bridge from pre-clinical research and development to the mainstream healthcare market. We're part of the continuous search for new healthcare solutions.

We seek out innovative new solutions in the life sciences field, support their development, and find business partners who can help scale them up and bring them to market. We provide our project companies with support, both financially and in terms of business expertise and advice.



Our principles and values

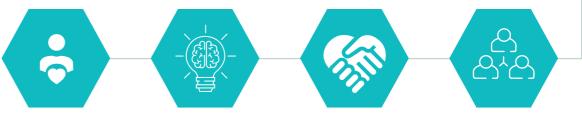


We want to bring the most innovative and promising life science research and technologies one step closer to the public

We believe that every human being deserves health and wellbeing

We're neutral with regard to politics and religion 🖕

Our values



Passion Innovation Humanity Collaboration

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Together we are strong

What we stand for

Our expectation

We offer a safe and inclusive working environment that allows our people to work efficiently and effectively. In return we have high expectations of our employees, project companies and business partners, in terms of ethical practices as well as their work quality and effort.

We treat our people fairly

Our people are vital to our success and we value them. As a minimum, we comply with applicable employment laws and with respect in the jurisdictions where we work (working hours, holiday requirements, etc.) and often go beyond.

Working responsibly and ethically

Everyone at Xlife Sciences works together to safeguard the interests of all our stakeholders with our know-how, reliability and efficiency.

Teamwork makes the dream work

We provide a safe working environment that respects human rights, labour laws, and health and safety regulations, taking local legal requirements as the minimum standard. Our work culture is open and honest. We champion the use of interdisciplinary teams that can assess business challenges from a range of perspectives, resulting in optimal, innovative solutions.

Looking out for each other

Everyone at Xlife Sciences follows our Code of Conduct and takes responsibility for their own and their colleagues' actions and their wellbeing. We treat each other fairly and with respect, and communicate openly.

Help us become strong every day

- Exchange ideas with your colleagues whenever you can
- 2 If you see a way to make things work better, share your ideas upwards
- When your colleagues have offered support, it's important to acknowledge it

Our Code of Conduct is based on the Xlife Sciences principles and values.

Who it applies to Our Code of Conduct applies across our entire business, including all employees and directors, as well as employees of the companies in which Xlife Sciences has a stake ('project companies'). We also encourage our business partners to share our commitment to this Code; this may include consultants, research partners and suppliers.

No exceptions

Everyone who works for Xlife Sciences must respect our principles and values, both in theory and in practice. Our Code of Conduct applies to all, regardless of race, nationality, religion, gender, age, sexual orientation, disability, political belief, or any other personal characteristic.

Our business partners

We expect our partners to share our commitment to ethical and responsible business practices. We encourage them to adopt this Code of Conduct, using any adaptations or additions necessary for their specific operations and business sector. We expect the project companies we work with to comply with the Code, after making any necessary adaptations.

Supporting innovation

This Code of Conduct was developed with the intention of promoting and fostering innovation at every stage of our work.

Consequences

We take breaches of our Code of Conduct very seriously, and will respond with appropriate disciplinary action. If you witness a breach, or suspect one may be taking place, raise your concerns with your supervisor or contact our independent compliance office (details on page xx).

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Individuality matters



We work with integrity

In all our day-to-day activities, we and our project companies always behave ethically and with integrity.

No discrimination

We strive to create an inclusive and supportive work environment for all. We value and honour the unique experiences, perspectives and cultural backgrounds that all our employees bring to the table. We will not tolerate harassment or discrimination of any kind, whether based on race, nationality, religion, gender, age, sexual orientation, disability, political belief or any other personal characteristic.

to our people

We're committed We will not tolerate retaliation against anyone who raises questions or concerns, or who reports violations of the Code or unethical conduct in good faith. We investigate all allegations of misconduct, including violations of this Code, and will take appropriate disciplinary and remedial action, up to and including termination of employment.

Wellbeing

We prioritise and support the health and wellbeing of all our people.

"We are a company of the future. We're committed to improving everyone's health. Not only through our research, but through our daily business practices and everything we do."

- Oliver Baumann, CEO



Sustainability

Respect and responsibility

We respect and value our business partners and the regulatory authorities we comply with; we maintain healthy, open working relationships with both. We value respectful, long-term partnerships.

Raising concerns As a minimum, we comply with all regulations, rules and laws that are applicable in the jurisdictions where we work. If you suspect a breach of the law, any applicable regulations, or our Code of Conduct, contact your supervisor or a member of the management team in the first instance. If you prefer, you can contact our independent compliance team (details on pXX).

Conflicts of interest

We must all avoid any actual, potential or perceived conflicts of interest, as even the appearance of such a conflict could be damaging. These might include accepting gifts or entertainment; working with external companies; owning, being a director of, or having personal relations with a competitor or partner; working with relatives or loved ones.

Acting with integrity

We can avoid the appearance of any conflict of interest by being committed to ethical, transparent business practice. Nobody at Xlife Sciences may use their position to benefit themselves or others, whether directly or indirectly. Our working behaviour and decisions must be based on the best interests of Xlife Sciences.

If something doesn't feel right... Follow your instincts! If you prefer not to tell your supervisor, contact our independent office (details on page 15).

Keep it Green

Working sustainably and responsibly is an integral part of every aspect of Xlife Sciences and our project companies.

Protecting people We always put our patients' health and interests first.

Working with compassion

We prioritise keeping our environmental footprint as small as possible, and minimising our impact on the local ecology. We avoid testing on animals when we can, although sometimes

this is unavoidable.

Creating value

We balance our business objectives with the wellbeing of our people and the communities where our employees live and

work.

For more information

You can find further details of our ESG strategy on our website.

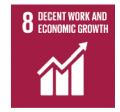
xlifesciences.ch/en/esa-en

The Department of Economic and Social Affairs of the United Nations defined 17 Sustainable Developement Goals (SDG). We chose 7 Goals to focus on:















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Scientific integrity

Out of core Humanity, collaboration, innovation and passion are the

cornerstones for our scientific activities.

Transparency We work with our partners to design and detail the scientific

studies we plan to conduct transparently and comprehensibly.

good for all

Working for the Public health and the public good is our top priority. We work safely, securely, openly and with accountability at all times. We put our patients' interests and needs above all when conducting

any research.

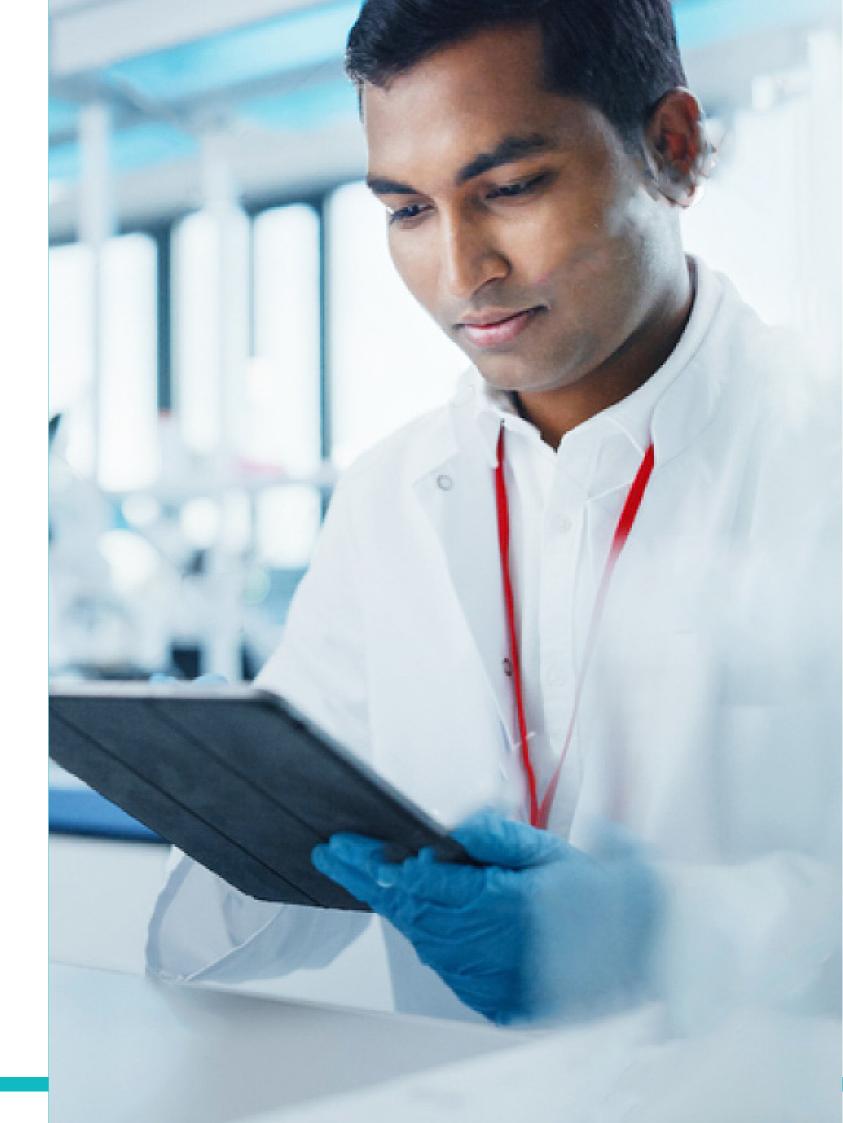
Zero tolerance foiWe investigate any suspicion of scientific misconduct misconduct

immediately, whether at Xlife Sciences or any of our project

companies or business partners.

"This is our core business and our heart: we won't compromise on it. We work with the best and most promising partners to improve healthcare for all."

- Dr. Frank Plögel, CSO





Dealing with data

Honesty We're transparent and truthful in all communications with our

Confidentiality We treat confidential information with appropriate care. This includes all non-public information, including trade secrets,

business data, guidelines, marketing, customer or supplier information, records, and all unpublished financial or other data, including in particular data relating to our research and development projects. Unless required by law or approved by our Management Team, employees shall not disclose or permit the disclosure of confidential information to any third party.

Data privacy We handle personal data

stakeholders.

We handle personal data with great care. We comply fully with all data protection regulations and legislation, in particular the European Union's General Data Protection Regulation (GDPR). If you have any questions or concerns about data protection activities at Xlife Sciences, contact our independent compliance office.

Data security We have appropriate safeguards in place to protect intellectual

property, contracts and other confidential agreements, and personal data of any kind. We use our information systems, applications and equipment responsibly, and protect our accounts, passwords and other systems access channels.

Fraud We comply with the disclosure requirements of the SIX Swiss

Exchange. In particular, we publish annual and semi-annual reports as well as timely notifications to investors and journalists of on matters that may affect our share price. We do not tolerate insider trading by our employees.

Staying secure – always ask yourself:

- When sharing any information in any format: is this already publicly available? If so, it's OK to share it.
- When speaking on the phone: is this a confidential topic that's not intended for the public? If so, don't share it.
- When working in public: is my screen visible to others? If so, please stop, or move.

Contact compliance office

If you suspect a breach of the law, any applicable regulations, or our Code of

For further concerns, contact our independent compliance office. To ensure an anonymized communication path, we use a special whistleblower tool.

Conduct, contact your supervisor or a member of the management team in the



first instance.

Laura Fontana http://xlifesciences.iwhistle.de +49 6131 8888791

About this Code of Conduct

- This Code of Conduct was first adopted by the Board of Directors on 01.12.2022. Its content will be reviewed regularly and updated as necessary.
- Our Chief Compliance Officer is responsible for its content: please direct any suggestions or feedback to him.

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