Third-Party Code of Conduct

Suppliers, Contractors and Business Partners
AFYX Therapeutics A/S
Public version (website)
Effective date: 07/07/2026
Approved and adopted by the Board of Directors on: 07/07/2026

Introduction

Purpose and Scope

AFYX Therapeutics A/S (together with its subsidiaries as they may exist from time to time, 'AFYX') is committed to conducting business ethically, responsibly, and in compliance with applicable laws and regulations. This Third-Party Code of Conduct (the 'Code') sets out the minimum standards expected of third parties that supply goods or services to, access AFYX premises or systems, process information for AFYX, or otherwise act for or on behalf of AFYX (collectively, 'third parties').

This Code applies globally to third parties, including suppliers, manufacturers, logistics providers, distributors, consultants, contractors, agents, and technology/service providers. Third parties are expected to ensure that relevant personnel and approved subcontractors comply with the principles of this Code.

Administration of this Code

AFYX's Board of Directors has overall responsibility for this Code. Day-to-day administration and interpretation are handled by AFYX management and relevant functions (e.g., Legal/Compliance, Quality, Finance, HR and IT Security), depending on the nature of the engagement and the issue raised. AFYX encourages third parties to refer to this Code frequently to ensure they are acting within both the letter and the spirit of the Code.

Contents of this Code

This Code has two sections. Section 1 ('Standards of Conduct') contains the conduct standards expected of third parties. Section 2 ('Compliance Procedures') describes how this Code is communicated, how concerns may be reported, how compliance may be monitored, and how violations may be addressed.

A note about other obligations

Third parties generally have other legal and contractual obligations to AFYX. This Code is not intended to reduce or limit those obligations. Instead, the standards in this Code should be viewed as the minimum standards that AFYX expects. Where this Code and a contract differ, the stricter requirement applies unless prohibited by law.

1. Standards of Conduct

Conflicts of Interest

A conflict of interest occurs when a third party's personal, financial, or other interests interfere, or appear to interfere, with acting in AFYX's best interests. Conflicts may arise, for example, through ownership interests, outside employment, family relationships, or gifts/benefits linked to AFYX business.

Any material transaction or relationship that could reasonably be expected to give rise to a conflict of interest must be disclosed promptly to the third party's AFYX business contact or via the reporting channels in Section 2.

Compliance with Laws, Rules and Regulations

Third parties must comply with all applicable laws, rules, and regulations in the jurisdictions in which they operate, including those relevant to pharmaceuticals/life sciences where applicable (e.g., regulated manufacturing, distribution, pharmacovigilance support, clinical research services, and healthcare interactions). No third party may engage in unlawful activity when conducting AFYX business, nor instruct others to do so.

Data Privacy

AFYX is committed to respecting and protecting personal data collected or processed in connection with AFYX business. Third parties must comply with applicable data protection laws, including the EU General Data Protection Regulation (GDPR) where applicable, and must implement appropriate technical and organizational safeguards.

When processing personal data for AFYX, third parties must:

1. collect and use only the minimum personal data needed for a defined, lawful purpose;
2. where required, provide transparency and ensure a valid legal basis for processing;
3. share personal data only on a need-to-know basis with appropriate safeguards (including for cross-border transfers);
4. store personal data securely and in accordance with applicable laws and contractual requirements;
5. delete, destroy, or de-identify personal data that is no longer needed, and respect individuals' rights under applicable law;
6. report suspected data incidents or breaches affecting AFYX without undue delay via the channels described in Section 2.

Anti-Bribery and Anti-Corruption

AFYX does not permit or condone bribery, corruption, kickbacks, or other improper payments. Third parties must not offer, promise, give, request, agree to receive, or accept anything of value to improperly influence any act or decision, or to obtain or retain business or any improper advantage, whether involving public officials or private parties.

Key principles include:

- "Anything of value" includes cash, gifts, hospitality, travel, charitable donations, sponsorships, grants, in-kind benefits, job offers or internships and favours for relatives or associates.
- Facilitation payments (small unofficial payments to expedite routine actions) are prohibited.
- Books, records, and accounts must accurately and fairly reflect business transactions. Off-book accounts, false invoices, and mischaracterized payments are prohibited.
- Heightened caution applies when dealing with public officials (including healthcare professionals employed by public institutions) and when third parties act as intermediaries. Third parties must maintain appropriate controls and oversight of their own subcontractors and agents.

Any concerns regarding bribery, corruption, or improper payments connected to AFYX business must be reported promptly.

Fair Dealing and Competition

AFYX expects third parties to deal ethically and lawfully with customers, suppliers, competitors, and others. Third parties must not take unfair advantage of others through abuse of privileged or confidential information, improper manipulation, concealment, or misrepresentation of material facts.

Anti-competitive conduct (including price fixing, bid rigging, market/customer allocation, or improper exchanges of competitively sensitive information) is prohibited.

Human Rights, Labor Standards, and Modern Slavery

AFYX expects third parties to respect internationally recognized human rights and labor standards. Forced labour, compulsory labour, and child labour are prohibited. Third parties must comply with applicable employment laws on wages, working hours, and working conditions.

Third parties should respect lawful freedom of association and collective bargaining rights where applicable and must not discriminate or harass workers.

Non-Discrimination and Fair Treatment

Third parties must maintain workplaces free from discrimination, harassment, and abuse. Retaliation against individuals who raise concerns in good faith is prohibited.

Health, Safety, and Site Security

Third parties must provide safe and healthy working conditions and comply with applicable health and safety laws. Where third parties' access AFYX sites or handle sensitive materials, they must follow AFYX site rules and security procedures and report hazards, near misses, and incidents promptly.

Environment and Sustainability

Third parties must comply with environmental laws and work to minimize environmental impacts, including responsible waste management and resource use. Where relevant, third parties should strive to reduce emissions and prevent pollution.

Protection and Proper Use of AFYX Assets

AFYX assets include physical property, equipment, funds, systems, and information. Third parties must protect AFYX assets entrusted to them and use them only for legitimate business purposes. Loss, theft, misuse, or unauthorized access must be reported promptly.

Confidentiality and Intellectual Property

Confidential information includes all non-public information that might be of use to competitors or harmful to AFYX, its partners, or customers if disclosed. Third parties must protect AFYX confidential information and intellectual property, use it only for legitimate business purposes, and disclose it only when authorized or legally required.

Upon termination or expiry of the business relationship, third parties must securely return or delete AFYX confidential information and personal data, revoke access rights, and confirm completion in accordance with contractual and legal requirements.

Accuracy of Records

Third parties must maintain accurate, complete, and reliable records related to AFYX business. Records must not be falsified, and third parties must not create misleading entries or documentation.

Quality, Patient Safety, and Regulated Activities

Where third-party activities can affect product quality, patient safety, or regulatory compliance, third parties must maintain an appropriate quality management system and follow applicable Good Practices (such as GMP for manufacturing, GDP for distribution, and GVP where relevant). Responsibilities must be defined in written agreements (e.g., technical/quality agreements) where required. Deviations and quality issues that could impact AFYX must be escalated promptly.

Public Communications and Social Media

Third parties must not speak on behalf of AFYX unless expressly authorized. Third parties must not disclose confidential information, personal data, or other sensitive information about AFYX, its partners, or stakeholders in public statements or on social media.

Information Security, Cybersecurity, and Resilience (NIS2-relevant expectations)

Third parties that access AFYX systems or data, provide IT/technology services, or are otherwise critical to AFYX operations must maintain an information security program proportionate to risk. Minimum expectations include access controls (least privilege), secure authentication where appropriate, patch and vulnerability management, malware protection, secure configuration, backups and recovery, logging/monitoring appropriate to risk, and secure development/change management where applicable.

Cybersecurity incidents or suspected compromises affecting AFYX must be reported without undue delay and no later than twenty-four (24) hours after detection, unless prohibited by applicable law. AFYX applies enhanced security and resilience expectations to critical or essential service providers. Such third parties must maintain and periodically test business continuity and disaster recovery arrangements appropriate to the service.

Third parties must cooperate in investigation, containment, remediation, and recovery and must flow down relevant security obligations to approved subcontractors.

2. Compliance Procedures

Communication of the Code

AFYX may request that third parties acknowledge this Code during onboarding, contract renewal, or other milestones. AFYX may update this Code from time to time and publish the current version on its website.

Monitoring Compliance and Corrective Actions

AFYX applies risk-based oversight of third parties, which may include questionnaires, documentation requests, assessments, and audits. Third parties are expected to cooperate and provide reasonable access to relevant records, sites, and personnel, subject to confidentiality and safety requirements.

Upon request, third parties must provide reasonable evidence of implemented information-security and resilience measures, proportionate to the risk and nature of the services provided.

Where non-compliance is identified, AFYX may require corrective actions, including root-cause analysis and preventive actions, within agreed timelines.

Reporting Concerns / Receiving Advice

Third parties are expected to act proactively by asking questions, seeking guidance, and reporting suspected violations of this Code, AFYX requirements, or applicable law connected to AFYX business.

Reports may be made through:

- the third party's primary AFYX business contact (e.g., Supply Chain, Quality, or project contact);
- AFYX via email at info@afyxtx.com; and/or
- any other channel specified in the relevant contract or onboarding materials.

AFYX encourages reporters to identify themselves to facilitate investigation; however, where permitted by law and available channels, anonymous reporting may be possible. AFYX will seek to maintain confidentiality to the extent permitted by law and consistent with a fair investigation.

Cooperation

Third parties must cooperate with AFYX in any investigation of potential violations, including preserving relevant records and providing timely, accurate information.

Misuse of Reporting Channels

Third parties must not use reporting channels in bad faith or in a knowingly false or unreasonable manner.

No Retaliation

AFYX does not tolerate retaliation against individuals who, acting in good faith and on a reasonable belief, raise concerns or report suspected misconduct connected to AFYX business. Third parties must ensure similar protections for their personnel.

Waivers and Amendments

Any waiver of this Code must be approved in writing by AFYX management (or the Board, where applicable). AFYX may amend this Code from time to time.

Approved and adopted by the Board of Directors on: xx/xx/xxxx