The background of the page is a dark green color. On the right side, there are several diagonal stripes in various shades of green and blue, creating a dynamic, modern look. The text is positioned in the upper left quadrant.

# ITF Therapeutics LLC

## Code of Conduct

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# Introduction

## Message from the ITF Therapeutics' President

At ITF Therapeutics ("ITF," the "Company," "we," or "us"), we are dedicated to bringing new therapeutic options to people living with rare diseases. We are guided by the voices of the communities we serve and value the special role that personal stories and experiences play in helping us understand the impact that rare diseases can have on patients and caregivers. Building on a legacy grounded in collaboration and innovation, ITF strives to partner with leaders from the U.S. patient advocacy and treatment communities to ensure that our programs reflect and support their unique needs and goals.

Our ability to deliver breakthrough treatments for rare diseases depends upon each of us conducting our business to the highest ethical standards. Our Code of Conduct ("Code") embodies the ethical principles and policies we follow in our daily activities, helping us make the right choices and maintain the trust of our stakeholders. Naturally, no code of conduct can cover all circumstances or anticipate every situation. For that reason, when faced with situations not addressed specifically in this Code, we should follow our underlying principles and overall philosophy embedded within this Code to address the situation.

We all share the responsibility to review this Code carefully and live by it. If you are ever unsure about a situation, prior to taking action, please speak up and seek guidance from your manager, senior leadership, the Chief Compliance Officer, our Compliance Hotline (anonymous), Human Resources (HR), or Legal representative on the best course of action.

Thank you for giving our Code your careful attention, for using it to help you make the best decisions in your important work, and for all you do to make ITF a great Company that makes an oversized impact for the rare disease communities we serve.

**Matt Trudeau**  
President, ITF Therapeutics LLC



## Purpose

We are privileged to be a member of the Italfarmaco Group of companies. At ITF, we are driven by the purpose to improve lives through ethical pharmaceutical innovation and cutting-edge research. We focus on rare diseases and unmet medical needs. We collaborate closely with patients, Healthcare Professionals (HCPs), and relevant partners to develop sustainable solutions that empower individuals to live life to the fullest.

We focus our investment on research and development, targeting the creation of high-quality, effective solutions that address the complex challenges and unmet medical needs facing patients and HCPs globally. Our manufacturing processes adhere to the highest quality standards, embodying our commitment to excellence and ethical practices.

Our drive for excellence is intertwined with commitment to sustainable growth and corporate social responsibility. We aim to make a positive impact for patient communities, society, and the environment, while at the same time achieving financial success.

*Note:* Terms defined in the **Glossary** section at the end of this document are underlined throughout.



## Scope

The Code applies to all employees, contractors, temporary staff, the Board of Directors, and any other individuals performing a job function for ITF (“ITF Personnel”). All ITF Personnel must adhere to the Code while performing their job responsibilities.

Employees responsible for engaging with third-party ITF Personnel must ensure that they are familiar with the Code and our expectation that they act in accordance with it.



In some cases, ITF may enter into contractual agreements that are more specific and/or more restrictive than this Code. In those cases, the more specific and/or restrictive guidance will take precedence. Additionally, if any applicable law or regulation is stricter than this Code, the stricter of the two will apply.

## A Culture of Compliance

ITF is committed to building a culture of compliance and requires all ITF Personnel to act ethically and in compliance with regulations. To uphold this commitment, we have developed a comprehensive compliance program and expect all ITF Personnel to proactively seek advice, ask questions, and report any actual or suspected violations of the Code and other Company policies and procedures.

Please see our *Compliance Handbook* for more information on our compliance program and other important Company policies.

## Commitment to Quality and Safety

At ITF, our top priority is the quality of our products and the safety and well-being of patients that we serve. Therefore, we are committed to ensuring the quality, efficacy, and safety of our products in compliance with all applicable quality guidelines and regulations relating to their development, manufacturing, and distribution, including but not limited to Good Laboratory Practices, Good Manufacturing Practices, and Good Clinical Practices.



# Conducting Ethical Business



## Conflicts of Interest

ITF Personnel should always avoid situations in which they or their relatives, friends, or associates could be seen as having a Conflict of Interest. This includes pursuing personal, social, financial, or political interests could contradict the interests and goals of the Company.

You are responsible for identifying whether a Conflict of Interest could negatively influence your professional decisions or actions pertaining to job performance. You must report any Conflicts of Interest to your manager, HR, and Legal representatives prior to engaging in the activity or acquiring the interest.

If you are not sure if a situation has the potential for a Conflict of Interest, please discuss with your manager, HR, or Legal representative.

Disclosure of a Conflict of Interest does not necessarily mean that the activity or interest will be prohibited or restricted. However, additional steps may be necessary to manage the Conflict of Interest to ensure business is conducted in a fair and transparent manner.

## Anti-Corruption and Anti-Bribery



ITF conducts our business with transparency. All forms of Bribery and Corruption are strictly prohibited when interacting with HCPs, customers, Government Officials, suppliers, vendors, or any other individuals or businesses.

ITF Personnel must never offer, promise, provide or authorize payments to improperly influence or gain an unfair business advantage. Additionally, we prohibit accepting any offer or demand for a payment that would affect our ability to act in the best interests of the Company.

ITF Personnel are responsible for reporting known or suspected improper transactions as soon as possible. If you are presented with an offer or demand for a bribe or are unsure whether a Gift may be acceptable, please contact your manager and Compliance representative.

## Fair Competition

Anti-trust and competition laws govern how we compete in the marketplace. We respect fair competition and never try to obtain non-public information about our competitors.

ITF Personnel are prohibited from engaging in practices that could be perceived as a violation of fair competition laws. This includes, but is not limited to, discussing pricing with competitors, misusing or abusing Confidential Information, collaborating with competitors to divide markets or customers, or any other deceptive, unfair, or unethical practices.





**Commitment to People  
and our Communities**

## ITF Personnel

ITF is dedicated to creating a workplace where all ITF Personnel are treated in a respectful and professional manner to further professional growth and personal well-being. We are committed to hiring and retaining qualified staff. We recognize and value diversity as a source of strength and encourage ITF Personnel to openly communicate and engage in respectful discussions. We treat all ITF Personnel with dignity and respect.



## Workplace Environment

ITF provides equal opportunity and fair treatment to all ITF Personnel. The Company strictly prohibits any discrimination or Harassment on the basis of age, gender, sexuality, health status, race, color, nationality, marital status, political opinions, religious beliefs, or any characteristic protected by applicable law.

ITF is committed to providing a safe and healthy workplace for all ITF Personnel free from drugs, alcohol, and violence. ITF Personnel are required to comply with Company policies regarding the use of alcohol and the possession, sale, or use of illegal substances. Additionally, our Company has a zero-tolerance policy for violence or threats of violence and prohibits the possession of weapons of any kind on Company property or while off-site conducting Company business.

All ITF Personnel should feel comfortable identifying and reporting workplace environment concerns. If you are treated inappropriately or witness inappropriate behavior, please report the workplace environment concern to your manager and HR.



## Health and Safety

The protection of the health and safety of ITF Personnel is one of the primary objectives of the Company.

Company activities must comply with the current health and safety regulations. ITF is committed to providing safe and healthy working conditions to protect the physical and moral integrity of the persons working at their manufacturing sites and offices.

All ITF Personnel should ensure others are not exposed to risks and hazards that could result in health and physical impairment. ITF Personnel are requested to actively contribute to the constant improvement of the safety conditions. Any questions or potential health or safety concerns must be reported promptly to your manager and HR representative.

## Environmental Protection

As an active member of our communities, ITF is committed to conducting business in compliance with environmental laws and regulations. Our goal is to promote behaviors and activities aimed at reducing the impact on the environment and manage our business in a manner that is sensitive to the environment and conserves natural resources.

## Marketplace and Community

ITF is committed to having a positive impact in its local communities through scientific discoveries and innovation and service to its community. We encourage volunteerism and service in the areas in which ITF Personnel work and live, with the aim of making a difference in the lives of others.





# Industry Collaborations, Partnerships, and Interactions



## Patient Focus

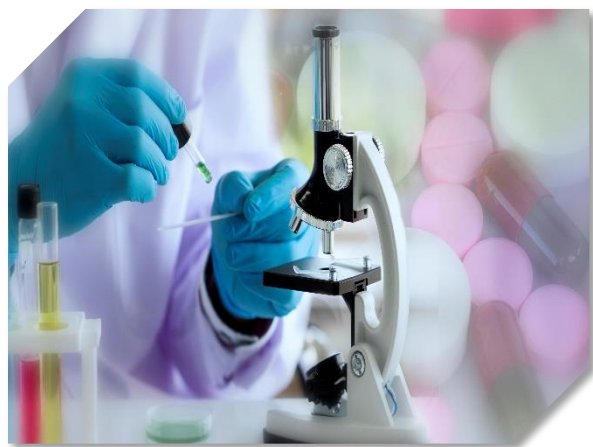
ITF is committed to patient safety and providing high quality, safe products that improve patient health. We continually seek new ways to advance science and medicine and deliver improved care for patients. ITF is ethically and legally obligated to track and report any Adverse Events or product quality complaints associated with its products. This data is used to provide the most accurate and up-to-date safety information to regulatory authorities and potentially to HCPs and patients. All ITF Personnel must report information on the safety, quality, or performance of ITF products, investigational or marketed, that comes to their attention.



ITF Personnel who identify a potential product concern with one of the Company's products must report the concern within twenty-four (24) hours to Pharmacovigilance at **1-833-582-4312** or [US.drugsafety@ITFtherapeutics.com](mailto:US.drugsafety@ITFtherapeutics.com).

## Clinical Trials

In the event that ITF conducts any sponsored clinical research, ITF will conduct the clinical research in compliance with all applicable laws, regulations, and global guidelines. ITF will follow established procedures for obtaining informed consent so that each participant understands the nature and purpose of the research before agreeing to participate.



ITF's responsibilities will include the management and oversight of study activities to safeguard the rights and well-being of human subjects. ITF will ensure the accuracy and integrity of reported study data, manage the inventory of investigational product, and ensure the conduct of the trial is conducted in compliance with the currently approved protocol and relevant legal and regulatory requirements.

ITF will conduct clinical research in compliance with the Animal Welfare Act and other applicable regulations and standards that involve the humane care of animals. Laboratory animals will only be used when scientifically necessary, enabling ITF to make advancements and discoveries that otherwise would not be achieved.

## Business Partners

At ITF, we strive to deal responsibly and ethically with all our Business Partners. We strive to create value through our business partnerships and seek to work with only qualified and reputable Business Partners whose values and standards are aligned with ours.

Relationships with Business Partners must be based on good faith and properly documented. The Company requires its Business Partners by contract to comply with the laws and relevant Company policies, including this Code. Any engagements with Business Partners who do not meet the Company's values and standards will be terminated.

## Interactions with HCPs

We interact ethically with HCPs and comply with the relevant laws, regulations, and industry codes that govern HCP engagements. Our relationships with HCPs are intended to improve patient care and advance the practice of medicine. ITF Personnel are expected to ensure that HCP interactions serve a legitimate business purpose, do not interfere with HCP's independent judgement, and do not provide (or appear to provide) any value or benefit intended to inappropriately influence HCPs.



ITF tracks and reports payments or other transfers of value to HCPs as required by law and will not provide anything of value to an HCP in exchange for, or in expectation of, influencing a prescribing decision or a recommendation of an ITF product.

## Business Gifts

It is prohibited to promise, offer or accept, either directly or indirectly, any Gifts, benefits or business courtesies, such as modest meals, hospitality, Gifts, or entertainment, to improperly influence a clinical or business decision.

Additionally, there are strict legal restrictions that apply to offers of Gifts or entertainment to HCPs, Government Officials, and patients. Before offering or accepting any Gift or business courtesy, ITF Personnel must ensure it is appropriate and in compliance with laws, regulations, and Company policies.

## Political Activities

ITF's ability to support political candidates and engage in political activities is regulated by various laws. ITF Personnel may participate in political activities in accordance with applicable law provided that such activities are conducted in an individual capacity and not on behalf of ITF.

## External Communications and Inquiries



We are responsible for providing accurate, truthful, complete, clear, and timely information to all of our stakeholders.

Material information concerning the Company is disclosed to the public only through specific limited channels to avoid inappropriate publicity.

All ITF Personnel are expected to exercise sound judgment and be attentive to any situation that could be perceived as communicating on behalf of ITF.

**Inquiries from the Government:** ITF cooperates with government authorities in connection with proper requests for information.

Only ITF Therapeutics' President and Head of Regulatory are authorized to respond to requests for information from government authorities. If responsible for responding to a government request or audit, you must provide honest, truthful, accurate, and complete information without fear of Retaliation.

Non-routine government requests must be immediately provided to Legal for guidance on our rights and obligations as a Company.

**Inquiries from the Media, Investors, and/or Public:** ITF manages interactions with the media, current and prospective investors, and other members of the public carefully and in compliance with all applicable securities laws and regulations. Inquiries from the media or investment community should be referred to ITF's Head, US Patient Advocacy & Communications. Only certain individuals from ITF US Corporate Communications or designated executive leaders are authorized to respond to these types of inquiries.





**Product, Personal, and  
Business Information**



## Personal Data and Confidential Information

ITF is committed to handling Personal Data and Confidential Information, both internal and external, according to the applicable privacy laws. We only collect and retain the minimum amount of Personal Data needed to conduct the applicable business activities. ITF Personnel who have a legitimate need to access others' Personal Data are bound to act in accordance with the Company's policies and procedures.

ITF's competitive advantage is dependent upon our repository of proprietary and confidential scientific, technical, and commercial information. A complex variety of laws enable us to protect these assets. Examples of confidential and proprietary information include ideas, concepts, products, or other information that ITF produces.

You are responsible for ensuring that confidential and proprietary information is treated as a valuable asset and maintained in a professional manner. ITF Personnel permitted to disclose or discuss ITF's confidential and proprietary information may only do so while performing their assigned Company responsibilities. This requires a proper authorization and a Legal-approved agreement in place governing the discussions. ITF Personnel may not use confidential and proprietary information during or after their tenure with ITF for personal gain or any other use ITF considers not being in its interest. ITF Personnel are expected to adhere to all confidentiality agreements and not disclose confidential and proprietary information from prior employers.

All ITF Personnel must respect and protect Confidential Information and be vigilant when transferring this information electronically.

## Company Assets

It is our policy that all Company assets, including but not limited to, funds, materials, equipment, and services (such as telephones, computers, internet access, email, facilities, know-how, and personnel), be used primarily for legitimate Company business. Company assets must always be used in an ethical and legal manner.

The security and confidentiality of Company information systems and data assets must be protected against theft, loss, misappropriation, and misuse. ITF Personnel must also protect information used to access Company systems, including user IDs, passwords, and building access key cards. This also applies to assets belonging to outside parties such as our suppliers, customers, and Business Partners.

Any suspicion of improper use, loss, or theft must be reported to Legal representatives or Compliance.

Upon termination of employment, ITF Personnel will return all property to ITF.

## Product Promotion

To help protect public health, governments strictly regulate how pharmaceutical companies can promote and sell products and interact with HCPs and other customers. We comply with product promotion laws and regulations and will only disseminate information about the Company's products that is truthful, scientifically accurate, balanced, non-misleading, supported by substantial scientific evidence, and consistent with relevant Food and Drug Administration (FDA) guidance.

Sharing scientific information about ITF's products and research is vital to our commitment to patients. ITF is committed to engaging in appropriate scientific communications and discussions concerning its research pipeline, marketed products, and disease states of interest.

## Accurate Books and Records

All ITF books, records, and accounts are maintained in accordance with applicable accounting laws and regulations. All transactions affecting assets, liabilities, stockholders' equity, revenues, and expenses are recorded accurately, completely, and timely in detailed journals and are traceable through the general ledger and resulting financial statements. Examples of books, records, and accounts include time sheets, bills, invoices, expense reports, contracts, accounting records, laboratory notebooks, shipping and customs records, and other essential Company data.

Our accounting and financial reporting practices are fair and proper, in accordance with Generally Accepted Accounting Principles (GAAP), using senior leadership's best judgment where necessary. We maintain effective disclosure controls and procedures as well as internal controls over the preparation of financial statements and financial reporting.

All ITF Personnel are accountable for ensuring the accuracy and completeness of all financial reports or documents they contribute to or create. ITF strictly complies with laws that require us to furnish pricing data to government entities.



## Record Retention

Consistent with good business practices and good judgment, we will retain records for as long as required and in the manner required to meet legal, regulatory, administrative, and operational requirements, after which they may be disposed of according to Company procedures.

If litigation or a government investigation or audit is pending or imminent, any relevant records must be preserved until the matter is closed. Destruction of records to avoid disclosure in a legal proceeding or investigation may constitute a criminal offense.

Please refer to the Company's *Document Retention Policy* or Legal representatives for more information.

## Insider Trading

During the course of business, ITF Personnel may become aware of confidential, non-public information regarding the Company ("Insider Information"). We must respect and maintain the confidentiality of Insider Information. It is illegal and unethical to use Insider Information or provide Insider Information to others for use in trading securities, also known as insider trading.

ITF complies with all applicable insider trading laws and regulations.

## Social Media

ITF acknowledges that Social Media provides a platform to promote our business interests and offers opportunities for communication and collaboration with the community. Our Company and ITF Personnel must use Social Media respectfully, appropriately, and responsibly.

Only authorized personnel who have received approval from senior leadership are permitted to use Social Media on behalf of ITF for business-related communications. All Company Social Media content must adhere to the Company's policies and procedures for review and approval of external information.

While using Social Media as an individual, ITF Personnel must maintain confidentiality related to ITF proprietary information, express only their opinion and refrain from any activities that suggest or imply they are acting on behalf of ITF, and respect all applicable laws, regulations, and Company policies.

Additionally, ITF Personnel have a responsibility to report any Adverse Events, product quality complaints, and/or Protected Health Information (PHI) that is posted on any Social Media platform or any other publicly accessible database or website. Adverse Events and product quality complaints must be reported within twenty-four (24) hours of learning of it to Pharmacovigilance at 1-833-582-4312 or [US.drugsafety@ITFtherapeutics.com](mailto:US.drugsafety@ITFtherapeutics.com). Unauthorized disclosure of PHI online must be reported to Legal representatives in a timely manner.





# Compliance with our Code



## Reporting Actual or Suspected Violations

All ITF Personnel have a responsibility to report any actual or suspected violations of our Code, Company policies and procedures, or industry laws and regulations.

The Chief Compliance Officer promptly reviews all reports of potential non-compliance and determines when a report requires investigating. As part of these investigations, we seek to maintain the confidentiality of the reporter, unless disclosure is required by law or confidentiality is unavoidable based on the nature of the investigation.

Failure to report a suspected violation that you are aware of may be cause for discipline. Similarly, filing false reports may also be cause for discipline as well. If you are ever unsure of the proper course of action, please report the suspected violation.

If you are ever unsure of the correct course of action to take, it's always best to ask. We offer multiple resources to answer your questions or report an actual or suspected violation:

- Your manager;
- Senior leadership;
- The Chief Compliance Officer;
- Our Compliance Hotline (anonymous) at **(833) 207-7368** or <https://ITF.navexone.com/>;
- HR representative; and
- Legal representative.

## Anti-Retaliation

At ITF, we expect ethical behavior and honesty.

All ITF Personnel, including managers, are strictly prohibited from engaging in any retaliatory behavior against anyone who has, in good faith, reported a concern or an actual or suspected violation or assists in a Company investigation.

ITF takes claims of Retaliation seriously. They will be investigated and, if verified, retaliators will be disciplined up to, and including, termination. If you believe you have been retaliated against, you should contact HR or any of the reporting options listed in this Code.

## Disciplinary Action

Violations of our Code, Company policies and procedures, regulations or laws may result in significant disciplinary action, up to and including termination of employment.

Others involved in the wrongdoing may also be subject to discipline; for example, an individual who fails to use reasonable care to detect a violation, an individual who refuses to cooperate with an investigation, and a manager who approves "looking the other way" or attempts to retaliate.

## Glossary

**Adverse Event:** Any unexpected medical occurrence in the use of a pharmaceutical product which does not necessarily occur in relationship to the treatment. An Adverse Event can be any unexpected and/or unintended sign, symptom, or disease temporally associated with the use of a medicinal product, whether or not considered related to the medicinal product.

**Bribery:** Directly or indirectly providing, promising, offering, accepting, or soliciting money, Gifts, entertainment, or other advantage for the purpose of illegal gaining or securing business advantages.

**Business Partners:** Contractors, agents, vendors, suppliers, or other entities acting on their behalf that ITF has a contractual relationship with.

**Confidential Information:** Private information intended for a particular audience and use within ITF or by its designated partners that includes Company, employee and customer information, corporate strategies, competitor sensitive information, trade secrets, research data, network architectures, and anything covered by a non-disclosure agreement.

**Conflict of Interest:** Any activity, interest (financial or personal), or association of any ITF Personnel (or of their significant others or immediate family) that interferes or appears to interfere with the interests of ITF.

**Corruption:** A dishonest behavior by a person in a position of authority to acquire an illegal, unwarranted, excessive, or otherwise improper business or personal benefit.

**Gift:** Any and all items of value including but not limited to cash and cash equivalents, gift certificates/cards, and/or credits or other equivalents such as vouchers or passes for accommodation or services, any tangible items (e.g., greeting cards, flowers, gift or food baskets, free or complimentary meals, clothing, etc.), tickets for sporting or entertainment events, donations made to a charity or memorial fund on behalf of a family member, and any other item that may have a personal benefit purchased using personal funds.

**Government Official:** A member of an agency, subdivision, or other body of any national, state, or local government, including hospitals and other health facilities owned or operated by a government, regulatory agencies, and government-controlled businesses, corporations, and societies.

**Harassment:** Any conduct whether physical, verbal or in any other form that creates an intimidating, hostile, or offensive work environment.

**Healthcare Professional (HCP):** All medical professionals including, but not limited to, physicians, medical students, nurses, nurse practitioners, physician assistants, pharmacists, medical technician, and other employees or staff who administer, prescribe, purchase, recommend, or are in a position to influence the use of ITF products.

**Insider Information:** Material information about a Company that is only known to employees of the Company and has not been made public.

**Personal Data:** Any data that can be used to identify a person directly or indirectly such as name, address, and demographic and health information.

**Retaliation:** Any adverse action that unfold in various manners including unfavorable work assignments, performance reviews, threats, Harassment, demotion, suspension, reduced compensation, denial of benefits, or termination, among others.

**Social Media:** The application of mobile and web-based technologies used for interactive or bi-directional (e.g., two-way) dialogue, which includes all forms of online publishing, digital media sharing and online discussions in social networks, collaborative forums, social communities, and social interaction such as blogs, wikis, user-generated video, and location-based applications.



# ITF THERAPEUTICS

ITALFARMACO® GROUP

## Code of Conduct

Effective August 2024