

# CODE OF BUSINESS CONDUCT AND ETHICS



# Code of Business Conduct and Ethics

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# Message from the CEO



Dear Colleagues,

At AC Immune, we are united by a bold purpose: to shape the future of neurodegeneration by discovering and developing breakthrough therapies through pioneering science and precision medicine. Everything we do is driven by our commitment to making a meaningful difference in the lives of patients, their families, and caregivers.

Our people are the cornerstone of our success. Through your dedication, integrity, and daily contributions we continue to fuel our growth, innovation, and impact. That's why aligning and maintaining a culture built on trust, respect, and shared values is essential to our shared success.

Our Code of Business Conduct and Ethics (the "Code") reflects who we are and outlines the principles and standards that guide our actions, helping ensure that we conduct ourselves ethically, fairly, and transparently — in every decision.

The Code is a commitment we make to one another and to the outside world to

embody our values of entrepreneurship, team spirit, modesty, open communication, and a passion to win. It fosters our culture of inclusion, trust, and accountability, and empowers each of us to ask questions, and speak up when something is wrong.

In a company driven by innovation and collaboration, how we work together matters as much as the results we achieve. The Code helps us navigate complexity with confidence and remain focused on what truly counts: advancing meaningful therapies and improving the lives of those affected by neurodegenerative diseases.

As you read our Code, reflect on its importance, and our shared responsibility to uphold these standards.

Thank you for your dedication, your integrity, and your continued contribution to our shared mission.

**Andrea Pfeifer**

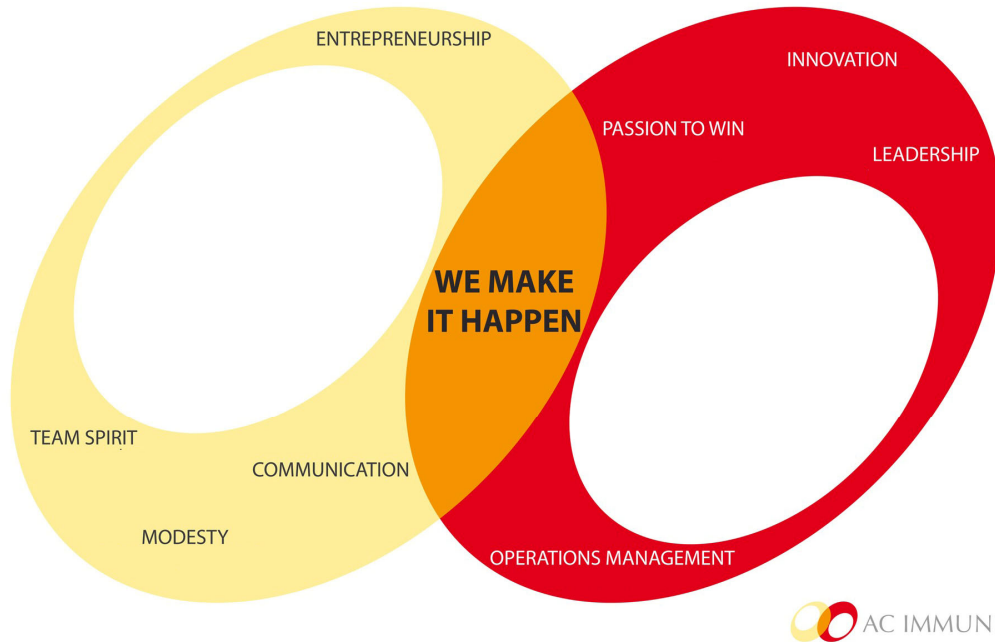
Chief Executive Officer and Director

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# AC Immune's Mission and Values

At AC Immune we are dedicated to becoming the global leader in precision medicine for neurodegenerative diseases. We strive to make a difference in the lives of patients, their families and caregivers. Our mission can only be achieved with a strong and shared company culture.

## THE VALUES OF AC IMMUNE



### Our Company Values

Our culture is grounded in our eight core values that define who we are and how we work together: **Entrepreneurship, Team Spirit, Modesty, Communication, Passion to Win, Operations Management, Leadership and Innovation.**

Our values represent what makes us unique: outstanding research and innovative power.

They serve as a guide for our actions and define our company identity.

### Our Ethical Values

We strive to foster a working environment that empowers our people and safeguards our most valuable assets: our reputation for integrity, professionalism, and fairness. We are committed to upholding the highest standards of ethical conduct in all our actions and in every interaction — whether with employees, partners, customers, suppliers, competitors, government bodies, the public, or our shareholders.

Above all, we are committed to following the law, and doing what is right: acting with **Integrity, Honesty, Accountability, Fairness, and Respect** in everything we do.

## Purpose of the Code

This Code sets out the principles and standards that guide us in how we work, make decisions, and interact with our colleagues, customers, suppliers, competitors, the government, the public, and our shareholders. It connects our actions to our broader purpose and helps ensure consistency, accountability, and ethical behavior across all levels of the organization.

The Code supports a culture where everyone feels empowered to raise concerns, ask questions, and speak up when something is wrong.

While it cannot cover every scenario, our Code provides guidance for responsible conduct and outlines the expectations that apply to all employees.

Terms not defined in this Code shall have the meaning as used or defined in the Articles of Association and the Organizational Rules.

## Applicability

The original version of the Code of Business Conduct and Ethics was adopted on 13 October 2015, and is replaced by this revised version, which is effective as of **1 October 2025**.

AC Immune is committed to ensuring that the Code is applied consistently and fairly across the organization: **this Code applies to all employees, officers, directors and all others acting on behalf of AC Immune**, regardless of role, location, or seniority.

The **Chief Executive Officer** holds primary responsibility for the **enforcement of the Code**, under the **oversight of the Compensation,**

**Nomination and Governance Committee of the Board of Directors**, which is responsible for corporate governance matters.

Where there are concerns involving accounting, internal controls over financial reporting or audit issues, the **Audit & Finance Committee of the Board of Directors** assumes oversight responsibility.

The **Legal department** is the custodian of this Code and is responsible for periodic reviews and implementation.



### Support

Questions regarding interpretation or application of the Code should be directed to **Legal** at:

[legal@acimmune.com](mailto:legal@acimmune.com)

# Responsibilities

## 1. Employees' and Managers' Roles

Upholding AC Immune's ethical standards is our shared responsibility. Everyone plays a part in protecting our reputation and ensuring our actions reflect our core values.

**All employees, officers, directors and all others acting on behalf of AC Immune are expected to:**

- ◆ Understand and apply the principles of this Code in their daily work.
- ◆ Follow all applicable laws, regulations, and internal policies.
- ◆ Use good judgment to recognize potential ethical issues and act with integrity.
- ◆ Complete required compliance and ethics related training on time.

**Managers and supervisors have additional responsibilities to:**

- ◆ Lead by example and demonstrate ethical behavior in all situations.
- ◆ Create a respectful, open environment where team members feel safe to ask questions or raise concerns.
- ◆ Listen carefully and take action when someone brings up a concern, including reporting the issue to the appropriate person or department if needed.
- ◆ Provide guidance and support to help employees apply the Code in their everyday decisions.
- ◆ Make sure that external partners and third-party providers they collaborate with also meet AC Immune's standards set out in this Code.

## 2. Exercising Good Judgement

Not all situations have a straight answer. When making decisions or facing ethical dilemmas, employees are encouraged to consider:



### Ask yourself

- ◆ Is it consistent with the values of AC Immune?
- ◆ Does this infringe our Code or any of our internal policies?
- ◆ Have I carefully considered the potential consequences of my decision?
- ◆ If my decision were made public, would it reflect negatively on me or cause harm to the reputation of AC Immune?

### When unsure, seek advice before proceeding



If you are unsure, pause and consider seeking advice from the relevant owner or expert in the company.

Alternatively, ask for guidance from:

- ◆ Your manager
- ◆ Human Resources (if involving an HR matter)
- ◆ Legal

### 3. Speaking Up When You Have Concerns

At AC Immune, all colleagues play a crucial role in protecting our culture — both by speaking up and by recognizing the risks of staying silent. **If something doesn't seem right, don't ignore it. Raising your concern is the right thing to do.** Staying silent allows misconduct to persist and to escalate.

If you see, hear, or become aware of a possible violation of the Code, a policy, or the law, report it promptly through one of the available channels. **Concerns raised in good faith will be treated seriously and handled with care and confidentiality.**

**AC Immune does not tolerate retaliation against any employee, officer or director who raises a compliance concern in good faith.** Everyone is expected to cooperate with investigations and contribute to a transparent, accountable workplace.

### 4. Where and How to Report a Concern

If you have a concern, the best place to start is usually by talking to your **manager**. They can often help solve problems quickly.

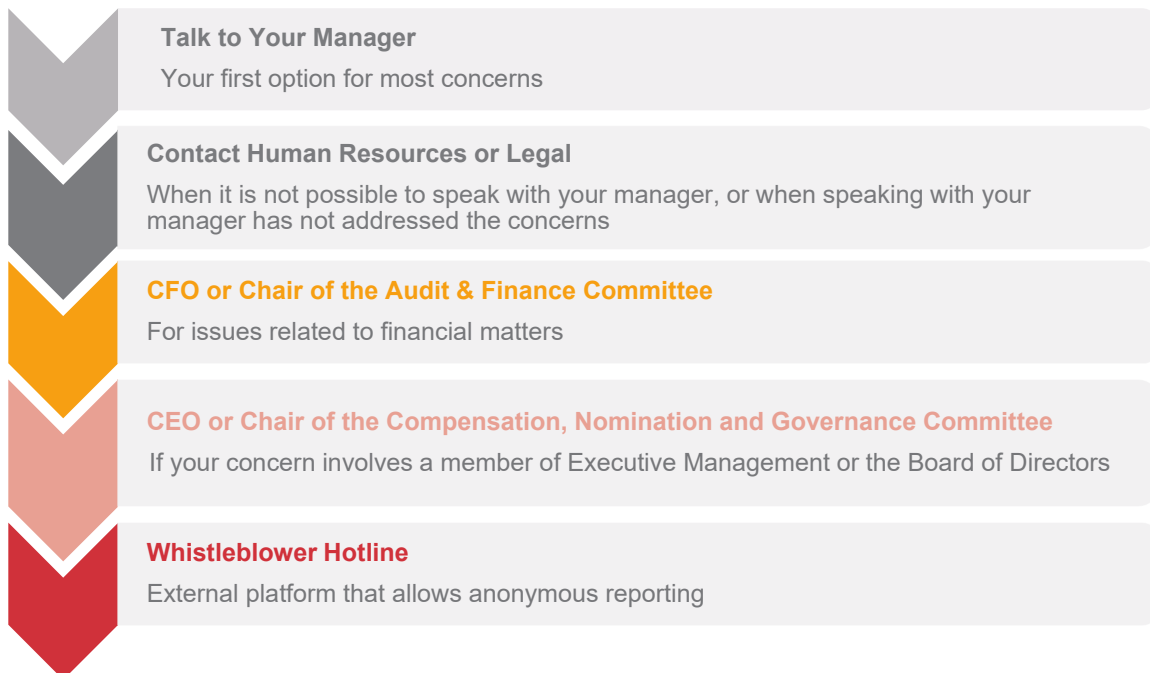
If you are unable to do that, for example, if your concern is about your manager, you can go directly to **Human Resources** (in the case of an HR matter as pointed out in this Code) or **Legal**.

Report issues about financial matters to the **CFO** or the **Chair of the Audit & Finance Committee**.

If your concern involves a member of the Executive Management or the Board of Directors, you can report it to the **CEO** or **Chair of the Compensation, Nomination and Governance Committee**.

You can also report concerns anonymously through our hotline:

online: <https://www.whistleblowerservices.com/aciu> or phone: +1 844-421-3585



## Q&amp;A

**Q: Can I report a concern anonymously?**

- ◆ **A:** Yes. The whistleblower hotline allows you to report concerns without revealing your identity. Disclosures made in good faith will not result in any form of retaliation or adverse consequences.

**Q: Can I report non-financial issues through the hotline?**

- ◆ **A:** You can report through the hotline any concern related to a breach of AC Immune's Code and policies, a specific law or regulation.



# Our Commitment to People and the Environment

## 1. Respecting our People

At AC Immune, we value and promote diversity in our employees. Our success relies on the unique strengths and contributions of each individual. We are committed to fostering an environment of mutual respect, where everyone's differences, including background, experience and perspective, are recognized and respected.

Our policies are designed to ensure that employees treat one another with respect, fairness, and dignity. Discrimination, harassment, or any form of disrespectful behavior will not be tolerated. We ensure that all employees are treated fairly,

regardless of differences such as gender, nationality, age, race, religion, political affiliation, sexual orientation, cultural background or disability.

All employees, officers, and directors must comply with these principles, ensuring equal opportunities for everyone and adhering to fair employment practices.

### A workplace free of discrimination and harassment

AC Immune is committed to maintaining a work environment that is free from harassment, intimidation or any form of improper conduct and where people feel safe not just physically, but also psychologically.

Unacceptable behavior, whether verbal, physical or visual, may constitute harassment or discrimination. Such conduct is strictly prohibited and may result in disciplinary action, including termination of employment.

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#### Some examples of unacceptable behavior include:

- ◆ Harassment or intimidation, such as bullying, mobbing, or using threatening or aggressive language, whether verbally or in writing
  - ◆ Discriminatory or offensive remarks, including disrespectful comments (e.g. related to gender, race, religion, disability)
  - ◆ Inappropriate behavior of a sexual nature, such as suggestive comments or jokes, unwelcome advances, or non-consensual physical contact
  - ◆ Unreasonable requests to colleagues, consultants or third-party vendors and service providers outside the professional domain of work using hierarchical authority or the fear of retaliation
  - ◆ Conduct that has the purpose, or effect, of humiliating someone
  - ◆ Creating an intimidating or offensive working environment
- 



#### Support

If you have any concerns, please contact **Human Resources** at:

[hr@acimmune.com](mailto:hr@acimmune.com)

## 2. Health and Safety

At AC Immune, we are committed to providing a safe and healthy work environment for all. Protecting the physical and mental well-being of our employees is essential to who we are and how we operate. We follow all applicable health and safety laws, our policies, and we expect everyone at AC Immune to do the same. We ensure that any contractors and visitors also adhere to the principles of safety and health in the workplace to ensure their own and their co-workers' safety.

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### Laboratory safety and maintenance

In our laboratories, safety is especially critical. We maintain the highest standards of safety as part of our operational excellence. Our efforts include:

- ◆ Thorough training on the use of machinery and instruments and how to handle hazardous materials and waste.
  - ◆ Regular equipment inspections and preventive maintenance.
  - ◆ Providing appropriate personal protective equipment.
  - ◆ Routine emergency exercises and clearly defined emergency response plans.
- 

### What this means in practice:

- ◆ We follow all safety procedures and take part in required training.
- ◆ We speak up if we see something unsafe, or if we're unsure how to handle a situation.
- ◆ We report accidents, injuries, and near-misses immediately so we can learn from them and prevent future risks.
- ◆ We maintain a workplace that protects health, prevents harm, and promotes well-being.

### Available Resources

- ◆ Health, Safety and Environment (HSE) Statement
- ◆ Site Safety Standard Operating Procedure (SOP)

## 3. Respecting the Environment

At AC Immune, we recognize the importance of environmental stewardship as an essential aspect of our business practice. Our stakeholders expect us to operate with a sense of responsibility that aligns with our fundamental mission.

We comply with environmental laws and regulations and continuously look for ways to reduce waste, conserve energy, and use resources more efficiently.

**You can help by:**

- ◆ Using materials, energy, and water responsibly.
- ◆ Properly disposing of chemicals, samples, and other lab or office waste.
- ◆ Reporting environmental risks or incidents promptly.
- ◆ Contributing ideas to improve environmental practices across the company.

In addition to complying with environmental standards, we embed sustainability into our business, including flexible working arrangements and mobility practices. Every employee is encouraged to take ownership in supporting environmentally conscious decisions and to contribute to innovative, sustainable ways of working at AC Immune.

**Support****Available Resources**

If you have any question related to 'Health, Safety and the Environment', please contact the **Health, Safety and Environment ("HSE") Department** at:

[hse@acimmune.com](mailto:hse@acimmune.com)

- ◆ ESG Report / Annual Report



# Personal Ethics & Integrity

## 1. Conflicts of Interest

At AC Immune, we are committed to upholding the highest ethical standards in everything we do. This includes making decisions that are free from personal bias or divided loyalties.

A **conflict of interest** arises when your personal interests, or those of a close relative\*, close friend\*\*, or affiliated entity, interfere, could interfere or appear to interfere, with your responsibilities to AC Immune.

Conflicts of interest can cloud your professional judgement, compromise your objectivity, undermine trust, and damage AC Immune's reputation.

**Therefore, employees, officers, and directors are expected to:**

- Be aware of and avoid actual, potential, or perceived conflicts of interest,
- Disclose to your group head, or manager, any situation that could present a conflict,
- Seek guidance when in doubt,
- Act transparently and in the best interests of the company at all times.

For the purposes of this Code:

\**Close relative* includes a spouse or domestic partner, parent, stepparent, child, stepchild, sibling, stepsibling, grandparent, grandchild, in-laws (mother, father, sister, brother, son, or daughter), or anyone residing in the same household or whose relationship with the individual could reasonably be perceived as similar to a family relationship.

\*\**Close friend* includes anyone you have a strong personal relationship with, such as someone you regularly socialize with or confide in, where that relationship could influence your decisions at work.

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### Examples of conflicts of interest

While not exhaustive, **the following situations may present a conflict and must be disclosed** and discussed with your **manager**. In some cases, your manager may need to consult with **Human Resources** or **Legal** to fully assess the associated risks and determine an appropriate risk mitigation measure:

- **Working, in any capacity, for a competitor, customer, partner or supplier** while employed by AC Immune.
  - **Accepting gifts or personal discounts** (if such discounts are not generally offered to the public) from a competitor, customer or supplier that is above the threshold set in this Code, because of your position at AC Immune.
  - **Having a financial interest** in a business transaction involving AC Immune (other than in your capacity as an employee, officer or director at AC Immune), a competitor, customer or supplier. This excludes **modest, routine arm's length investments in publicly traded companies** that would not create a risk or perception of influence or insider access.
  - **Using AC Immune's assets, confidential information, or position** for personal gain or outside business opportunities.
  - **Receiving personal benefits, loans or guarantees** from a third party because of your position at AC Immune.
  - **Directing AC Immune business** to a supplier owned or managed by, or which employs, a relative or close friend.
  - **Having a close relative or friend employed at AC Immune**, especially in a role where you have a reporting line, influence, or a decision-making authority.
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## 1.1. Outside engagement

**Employees must notify and obtain prior approval from their executive manager** (and executive managers from the Board of Directors) **before accepting any invitation to engage in an outside activity**, such as serving on a board, delivering remunerated lectures, or accepting academic or advisory positions, to ensure the engagement does not conflict with their responsibilities at AC Immune or the company's mission, values and interests.

## 1.2. Competing with AC Immune

Employees, officers and directors are not allowed to benefit from business opportunities using corporate property, information or position for personal gain or directly compete with AC Immune.

Competing with AC Immune may involve engaging in similar business, research, development, or intellectual property areas as AC Immune or any situation in which the employee, officer or director takes away from AC Immune opportunities for growth, business development or commercialization opportunities, sales or purchases of property, products, assets, services or interests.

### Q&A

#### Q: Can I take part in the recruitment process of a close relative?

- ◆ **A:** No. Participating in the recruitment or selection of a close relative constitutes a conflict of interest. You must disclose the relationship to your **manager** and **Human Resources** and fully recuse yourself from the process. In any case, your close relative should not report to you, and you must not attempt to influence the hiring decision or employment conditions in any way.

#### Q: I've been asked to join a university advisory board that meets occasionally. Is this allowed?

- ◆ **A:** Possibly, but you must first seek approval from your **relevant executive manager**. Even if it is unpaid or unrelated to your current work, outside board engagements must be reviewed to ensure they do not interfere with your responsibilities or create a conflict.



#### Q: A close relative works as a manager for a supplier currently participating in an AC Immune request for proposal. I have influence over the selection. What should I do?

- ◆ **A:** You must disclose the relationship to your **manager** and fully recuse yourself from the selection process. If the supplier presents the most competitive offer, the decision may still proceed, but only after the conflict has been transparently assessed and managed. In such case, you may also be required to recuse yourself from the management of the ongoing relationship with this supplier.



### Support

If you have any questions related to 'Conflicts of Interest', please contact **your manager**.

If necessary, you may also contact **Human Resources** or **Legal** at:

[hr@acimmune.com](mailto:hr@acimmune.com) or [legal@acimmune.com](mailto:legal@acimmune.com)

### Available Resources

- ◆ Related Person Transaction Policy

## 2. Trading on Inside Information

Employees, officers and directors must ensure that non-public information about AC Immune is not used improperly in the trading of securities. The rules governing the use of Material Non-Public Information (also known as Inside Information) are designed to ensure that all investors have equal access to significant information about the company.

Anyone who becomes aware of Inside Information – whether about AC Immune itself or about its suppliers, customers, or competitors through the course of their work must:



- Treat the information as strictly confidential;
- Not trade in the securities of the relevant company until the information has been publicly disclosed; and
- Not pass on or share such information with others (known as “tipping”).

For the purposes of this Code, Material Non-Public Information or “Inside Information” is any information that:

- a reasonable investor would consider important when deciding whether to buy or sell securities; and
- has not been made publicly available in a broad, non-selective manner.

All employees, officers, and directors are expected to read and comply with *AC Immune’s Policy Concerning Trading in Company Securities*. If there is any uncertainty about the use of Inside Information or the rules on trading, they should contact the **Chief Financial Officer** or the **General Counsel**.



 <b>Support</b>	<b>Available Resources</b> 
The <b>Chief Financial Officer</b> or the <b>General Counsel</b> should be contacted with any questions about employees, officers and directors’ ability to buy or trade securities.	♦ AC Immune’s Policy concerning Trading in Company Securities

### 3. Use of Social Media and Public Statements

Employees, officers and directors should use good judgment when posting information about themselves or AC Immune, as such content reflects on both the individual and on AC Immune.

When using social and professional networking platforms, we should maintain professionalism, integrity, discretion and confidentiality, following the guidelines below.

#### Social Media Guidelines:

- ◆ Never disclose confidential, non-public, or proprietary information about AC Immune, its staff, business, structure, customers, suppliers or partners.
- ◆ Make clear that any views, including political beliefs that you share are your own and not those of AC Immune.
- ◆ Uphold AC Immune's values and standards of professionalism when posting on social media.
- ◆ Be respectful of your colleagues and individuals associated with AC Immune, including customers, suppliers and partners.
- ◆ Promptly report to Investor Relations and Corporate Communications (Communications) any social media content that inaccurately or inappropriately discusses AC Immune or any of AC Immune's assets or programs.
- ◆ Don't engage with requests for information about AC Immune and don't respond on its behalf, unless authorized by the CEO, or Communications to do so.
- ◆ Do not post documents (in their entirety or partially), images, photos, videos or audios that belong to AC Immune and which are not available on its official channels, or website.

#### 3.1. Statements on behalf of AC Immune

Employees, officers and directors who are not expressly authorized to make official statements on behalf of AC Immune, may not do so. The use of the name and logo of AC Immune in documents that are not officially issued by AC Immune is not permitted without prior authorization.

Personal opinions regarding politics, religion, and any form of opinion that may be potentially controversial, or that could be considered offensive by others, must not be expressed as if it would be AC Immune's opinion or potentially attributable to AC Immune.

#### 3.2. Public disclosures

AC Immune has a responsibility to communicate effectively with shareholders so that they are provided with full and accurate information, in all material respects, about AC Immune's financial condition and results of operations. Our reports and documents filed with or submitted to the United States Securities and Exchange Commission, and any other public communications shall include full, fair, accurate, timely and understandable disclosure.



#### Support

If you require guidance or receive any media inquiries, please contact **Communications** at:

[communications@acimmune.com](mailto:communications@acimmune.com)

# Corporate Ethics & Integrity

## 1. Compliance with Laws and Regulations

Our actions are the foundation of our reputation and adherence to applicable laws, regulations and industry codes are at the core of how we operate.

Operating our business in compliance with those and this Code is not optional, it is imperative. **No employee, officer or director of AC Immune shall engage in illegal conduct, behave unethically or collude with, be complicit with, ignore, or attempt to influence others to do so.**

### 1.1. Antitrust / Competition laws

Antitrust/competition laws aim to ensure that organizations compete fairly and protect markets and consumers. They prohibit anti-competitive practices, including agreements between competitors on matters such as prices, terms of sale, or markets/customers allocations. Violations can result in serious consequences for both AC Immune and the individuals involved, including heavy fines, imprisonment of individuals and civil liability.

### 1.2. Economic and trade sanctions and export controls

Economic and trade sanctions are a restrictive measure imposed by governments, group of countries or international bodies, such as the US, Switzerland, the EU, or the United Nations, to restrict dealings with specific countries, entities, or individuals. As a matter of principle, AC Immune adheres to applicable economic and trade sanctions. AC Immune complies with export controls and does not engage with third parties seeking to circumvent export controls.



#### Support

If you have questions or concerns about the applicability of a specific law or regulation, contact the **General Counsel** for guidance at:

[legal@acimmune.com](mailto:legal@acimmune.com)

## 2. Dealing With Third Parties

We strive to promote the application of the standards of this Code by those with whom we do business.

Our policies, therefore, prohibit the engaging of any third party to perform any act prohibited by law or by this Code, and we shall avoid doing business with others who intentionally violate the law or the standards of this Code.

### 2.1. Unfair dealings

We should endeavor to deal legally, ethically, fairly with customers, suppliers, competitors, the public and one another at all times. Employees, officers and directors should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

## 2.2. Anti-bribery and corruption

No bribes, inducements or other similar payments in any form shall be made directly or indirectly to or for anyone for the purpose of obtaining or retaining business or obtaining any other favorable action and AC Immune shall at all times comply with applicable laws and regulations relating to the engagement in business relations with healthcare professionals, including, as applicable, the disclosure of such relationships. AC Immune is committed to providing adequate training with respect to anti-bribery and corruption and employees are expected to attend such trainings.

In the event of a violation of these provisions, the individual(s) involved may be subject to disciplinary action as well as potential civil or criminal liability.

## 2.3. Gifts and hospitality

Accepting or offering gifts or other advantages can help to foster goodwill. However, a gift could, in certain situations, be perceived as a way to exert influence on AC Immune or be considered a bribe.

### 2.3.1. Receiving Gifts

Employees, officers and directors are forbidden from soliciting gifts or other advantages from AC Immune's suppliers, partners, customers, healthcare providers or government officials. They are also discouraged from accepting cash or cash equivalent as well as luxury or high-value gifts at any time and of any value, which should politely be declined.

If you are offered a gift by AC Immune's suppliers, partners, customers, healthcare providers or government officials with a value of CHF 100 or more, you should inform and seek written approval from your executive manager before accepting any such gift at the earliest opportunity.

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#### Examples of gifts that should be declined include:

- ◆ cash, gifts convertible into cash or gifts equivalent to cash (e.g. shares, securities, vouchers or cash loans)
  - ◆ luxury or high-value items (e.g. designer articles, jewelry, watches), lavish hospitality (e.g. paid trips, event tickets), gifts offered in the context of a current or future procurement process.
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**Authorization from your executive manager is required before accepting any trip or other form of hospitality in a professional/business context offered by AC Immune's suppliers, partners, customers, healthcare providers or government officials**, including participation in conferences, seminars, fairs and similar events.

### 2.3.2. Offering Gifts

No gift, hospitality or entertainment should ever be considered if the intention is to influence, or appears to influence, a business or professional decision (e.g. gifts offered with the expectation of receiving something in return).

#### Employees, officers and directors shall not give or offer to give:



- ◆ any gift, hospitality or entertainment to a government official, regardless of the amount;
- ◆ any cash or cash equivalents (e.g. gift cards, gift certificates, vouchers);
- ◆ any gift with a value above CHF 100.

Specific rules apply to gifts and hospitality offered to healthcare organizations or professionals. Please consult **AC Immune's Anti-Corruption policy for further details.**

### Example

In addition to anti-bribery and anti-corruption laws that exist in Switzerland and across the European Union, the United States Foreign Corrupt Practices Act (the "FCPA") prohibits giving anything of value directly or indirectly to any foreign official with the intention of obtaining or retaining business.

For the purposes of this Code, a foreign official means: (i) any officer or employee of a foreign government, any department, agency, or representative of a foreign government, or of a public international organization; (ii) any person acting in an official capacity for a foreign government or public international organization, regardless of their position.

 Support	Available Resources 
If you have any questions related to 'Dealing With Third Parties', please contact the <b>General Counsel</b> at: <a href="mailto:legal@acimmune.com">legal@acimmune.com</a>	♦ Anti-Corruption Policy

## 3. Financial Record Accuracy

We maintain the highest standards in all matters relating to accounting, financial controls, internal reporting and taxation. All financial books, records and accounts must accurately reflect transactions and events and conform both to required accounting principles and to the company's system of internal financial reporting controls. Records must not be falsified, misrepresented, or altered in any way that could mislead auditors, regulators, internal reviewers, and financial statement users.

## 4. Personal Data

Personal data includes data or information relating to any identifiable natural or legal person that is protected by applicable law and covers, without limitation, personal data of AC Immune employees, partners, suppliers, customers, clinical trial participants or other stakeholders.

AC Immune complies with all legal requirements applicable to collection, processing, storing, use, revision, disclosure, archiving or deletion of any personal data.

Breaches of privacy laws can have serious legal and reputational consequences for AC Immune. To help prevent such risks, all employees, officers, and directors are expected to understand their responsibilities regarding personal data. To do so, they are expected to familiarize themselves with and adhere to the General Privacy Policy at all times.

 Support	Available Resources 
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Employees, officers and directors must ensure that **Legal** is always consulted for matters related to personal data. Please contact:

[legal@acimmune.com](mailto:legal@acimmune.com) or [dpo@acimmune.com](mailto:dpo@acimmune.com)

◆ General Privacy Policy

## 5. Government Inquiries

AC Immune strives to cooperate with governmental agencies and public authorities when requested to do so for the purposes of an investigation, inquiry or other official requests.

**Employees, officers and directors must forward all requests for information, other than routine requests, to the General Counsel immediately to ensure that AC Immune can respond appropriately to such requests.**

Information provided to any governmental agency or public authority must be truthful and accurate.



# Company Assets

## 1. Protection of Confidential Information

Confidential information generated by or on behalf of AC Immune is a valuable asset. Protecting this information plays a vital role in our continued business growth and our ability to compete, and all confidential information should be maintained in strict confidence, except when disclosure is authorized by AC Immune or required by law or by a governmental agency or public authority.

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**Confidential information includes** all non-public information that might be useful to AC Immune's competitors or that could be harmful to AC Immune or its partners / collaborators, its customers or its suppliers if disclosed. In particular, it includes intellectual property such as trade secrets, patents, patent applications, as well as technical, scientific, research, preclinical, clinical and safety information, including study designs and protocols, assays and biological methodology, clinical and regulatory, manufacturing and new product development plans, objectives and strategies, technical data, analytical and quality control data, chemical structures, sequences, formulae, formulation, drawings, designs, methods, concepts, records, databases, salary and benefits data, employee medical information, customer, employee and suppliers lists and any unpublished business, financial or pricing information.

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The unauthorized use or distribution of confidential information violates this Code, may be illegal and result in negative consequences for AC Immune. The individuals involved can be subject to legal and disciplinary action, up to and including termination of employment.

We also respect the confidential information of other companies and require our employees, officers and directors to do the same. We use it in a manner consistent with our legal and contractual obligations, and keep it secure and private, with no opportunity for anyone to access it without permission.

## 2. Intellectual Property

AC Immune must protect its intellectual property, one of our most valuable and powerful assets as it gives us a legal right to exclude others from using our inventions. Our intellectual property is the fruit of our extensive and valuable research and development (R&D) work and our strive to improve people's health and quality of life. It needs to be protected from misuse and/or unauthorized dissemination.

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### **Examples of intellectual property are:**

Patents, trade secrets, know-how, trademarks (name and logo), copyrights, domain names, computer software, industrial designs, database rights, geographical indications, confidential information, amongst others.

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**Authorization from the Head of IP (cc CEO) is required before any intellectual property from AC Immune is shared with any third parties.**

**The Head of IP, CEO and General Counsel need to be made aware of any infringement of AC Immune's intellectual property so that adequate measures can be taken.**

We also respect the intellectual property of others. We refrain from using their proprietary rights without authorization to do so and we do not reproduce someone else's work without proper authorization or being granted a license. This includes not only written content (e.g. patents, reports, research, academic papers) but also images, videos, software and other creative works.



### 3. Retention of Records

All Company business records and communications should be clear, truthful and accurate. In all their communications at AC Immune, employees, directors and officers of the Company shall avoid exaggeration, guesswork, legal conclusions and derogatory remarks or characterizations of people and companies.

Employees, officers and directors are expected to comply with AC Immune's policies regarding data retention.

Much of the information that employees, officers and directors create or receive in the course of their business needs to be retained as official records for the required periods, as they are valuable assets that belong to AC Immune.

Maintaining records of information for the required periods is essential for the protection of AC

Immune's business interests, to uphold AC Immune's quality standards and to fulfil regulatory obligations.

It is the responsibility of employees, officers and directors to ensure that records are protected from loss or misuse, their integrity is maintained, and they can be found and accessed for business purposes and in case of investigations, inspections, inquiries from governmental agencies or authorities, internal and external audits.



#### Support

If you have any questions related to this chapter, please contact **Legal** at: [legal@acimmune.com](mailto:legal@acimmune.com)

## Breaches of the Code

Violation of this Code can have severe consequences on AC Immune's operations, financial status, credibility and reputation, as well as your own.

Breaches of the Code by any employees, officers or directors can lead to disciplinary action, up to and including termination of employment. Depending on the severity of the breach, it may also lead to legal action or even criminal proceedings.

## Reporting to U.S. Government Agencies

For the avoidance of doubt, nothing in this Code is intended to prohibit any employee, covered by such protection, from disclosing or reporting violations to, or from cooperating with, a United States governmental agency or entity or United States self-regulatory organization, and employees may be required to do so without notifying AC Immune. Employees have the right under United States federal law to certain protections for cooperating with or reporting legal violations to governmental agencies or entities and self-regulatory organizations.

AC Immune will not retaliate against an employee for any of these activities, and nothing in this Code requires an employee to waive any monetary award or other payment that may be granted from a United States governmental agency or entity, or United States self-regulatory organization, for their cooperation.

## Amendments and Reviews

The General Counsel shall review this Code regularly and propose amendments to the CEO and the Compensation, Nomination & Corporate Governance Committee, as appropriate. The Compensation, Nomination & Corporate Governance Committee shall also periodically review the Code and recommend changes to the Board of Directors for approval. Revised versions of the Code will be published on AC Immune's website, replacing any previous edition.

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