

## ART-Biopharma's Code of Conduct Policy V2.1

**Effective Date:** 10.12.2025

**Approved By:** Dr David Shahbazian CEO

### 1. Purpose

ART-Biopharma LLC is committed to conducting business ethically, responsibly and in alignment with internally recognized standards. As a remote working organization operating in a highly regulated sector, we are committed to conducting business responsibly and transparently. This policy sets expectations for ethical behaviour, legal compliance, respect for human dignity, environmental responsibility and responsible use of human biospecimens for research purposes. This policy aligns with Armenian legislation and international best practices.

### 2. This policy applies to:

This policy applies to all employees, contractors and representatives of ART-Biopharma LLC

### 3. Our Core Values include

- Respect for people and donors
- Scientific and professional integrity
- Transparency and traceability
- Compliance with Armenian laws and international standards
- Sustainability and Social responsibility

### 4. Legal and Regulatory Compliance

We comply with all applicable laws and regulations in Armenia and in countries where we operate or where our partners are based as there is no business objective which justifies breaking the law.

- Personal data protection and privacy regulations
- Laws on clinical research and use of human biospecimen samples
- Anti-corruption, anti-bribery and fair compensation laws
- Health, safety and labour laws
- Follow international guidance relevant to biomedical research (e.g. CIOMS/WHO ethical guidelines, Helsinki Declaration, ICH-GCP) To comply

with all applicable Armenian laws, international regulations and industry standards.

- Abide by rules governing biospecimen sourcing, data protection (e.g GDPR) and bioethics.

## **5. Respect for Donors and Patients and Donors**

### **5.1 Ethical Biospecimen Sourcing**

ART-Biopharma only works with Biospecimen service providers who:

- Have appropriate ethics committee/ IRB approvals where required
- Maintain a documented informed consent process
- Comply with all applicable local, national and international laws, which includes HIPPA (or respecting the personal information protection and electronic documents act PIPEDA) or equivalent privacy laws, GDPR, Helsinki declaration, as well as to be compliant with Good clinical practice (GCP), Good Laboratory Practice (GLP).
- Must be able to demonstrate traceability and responsible handling

If any member of the team becomes aware of a partner acting in an unethical way, they must escalate the concern immediately to the Director: Dr. David Shahbazian

## **6. Professional Conduct in a Remote Working Environment**

### **6.1 Respect for Individuals**

All members of the team are expected to:

- To be honest and transparent in all interactions.
- Act with courtesy, respect and professionalism in all written, verbal and virtual communications
- Avoid any inappropriate behaviour that could damage the reputation of ART-Biopharma
- Utilize only company communication tools or approved methods of communication for professional purposes.

### **6.2 Working Hours and Work-Life Balance**

ART-Biopharma is committed to a sustainable and healthy work-life balance

- We encourage a flexible work environment
- Personal time should be respected and responses outside of the employee's contractually agreed hours should not be encouraged

- Employees are encouraged to take breaks, use their vacation time and be transparent if their workload is causing them to feel overwhelmed

### **6.3 Remote Health and Safety**

We are a 100% remote working company and care about the safety of our employees in their remote workspace. Team members should, if they choose:

- Maintain basic work from home safety (as stipulated in the Health and Safety Remote work Policy)
- Immediately report any work-related injury or health concerns that may impact job performance

## **7. Fair Treatment, Non-Discrimination and Anti-Harassment**

### **7.2 Equal Opportunity**

We do not tolerate discrimination of any kind, which includes:

- Age
- Sex, gender identity or expression
- Ethnicity, nationality or race
- Disability or health status
- Religion or belief
- Sexual orientation
- Marital or family status
- Political opinion or any other status protected by law

Employment decisions which includes hiring, compensation, training and termination is solely based on skills, experience, performance and business needs.

### **7.3 No Tolerance for Harassment and Bullying**

There is a zero tolerance for any kind of harassment, bullying or abuse. This includes

- Intimidation, offensive behaviour or bullying
- Sexual harassment or inappropriate comments
- Persistent unwanted contact
- Humiliation, threats or deliberate exclusion

All team members are responsible for maintaining a respectful work environment and for speaking up if they experience or witness harassment.

#### **7.4 Equal Pay and fair Compensation**

All employees are compensated fairly based on their experience, responsibilities and aligned with the Armenian labour laws. Pay decisions are not permitted on discriminatory factors.

### **8. Integrity, Conflicts of Interest and Business Ethics**

#### **8.1 Integrity in all Dealings**

Information provided to clients, partners and regulators is truthful, complete and accurate information. We do not:

- Falsify or manipulate records, data or reports
- Hide relevant information in proposals or project communication
- Misrepresent capabilities, timeline or sample availability

#### **8.2 Conflicts of Interest**

A conflict of interest may arise where personal interests interfere with company interests. Team members must disclose potential conflicts to the Director immediately. Examples of conflicts of interest include:

- Accepting gifts or hospitality that create a sense of obligation
- Holding a financial interest in a supplier or biospecimen partner
- Using company information or position for personal gain
- Favouring a vendor because of a personal relationship

#### **8.3 Gifts, Hospitality and Entertainment**

Modest and occasional business courtesies may be accepted (e.g a mug or shirt). However, the following should be observed:

- We never offer gifts, payments, commissions or other benefits that could appear to influence business decisions.
- Cash or cash equivalents are not acceptable
- Any gift or hospitality must comply with company guidelines which are outlined in our policies and procedures on Business ethics

## 8.4 Anti-Corruption and Anti-Bribery

There is a zero tolerance for corruption within ART-Biopharma. Team members should never:

- Offer any forms of bribery, kickbacks or unethical business practices
- Use intermediaries to make improper payments
- Facilitate unlawful or misconduct by others

## 9. Environmental Responsibility

As a 100% remote working business, with an almost net zero environmental footprint, we continue to encourage employees to:

- Minimize the use of non-recyclable or excessive packaging in sample transport
- Use eco-efficient logistics practices where possible
- Comply with applicable environmental protection laws in their operations
- Avoid retaining repetitive data or large files which are not required
- Maintain virtual meetings over travel where possible
- Intentionally select transport with lower CO2 emissions when travelling for work (e.g. if we ever need to visit our partners or attend scientific meetings and conferences etc)

## 10. Confidentiality, Data Protection and Cybersecurity

We comply with Armenian data protection requirements and internationally recognised privacy principles. All employees and contractors must:

- Only use confidential information shared by clients or biospecimen partners for legitimate business purposes
- Only share information with authorized persons who are allowed to view the information
- Ensure all personal data, contracts, internal strategies, systems and financial information is stored securely
- Use strong passwords and multi-factor authentication which was advised by the company
- All devices are required to have an up-to-date antivirus and security patches
- Any suspected data breaches or cyber incidents should be reported immediately

- All Data Manifests with non-sensitive donor information should be shared pseudo-anonymized or fully anonymized:

## 11. Sustainable Procurement and Partnerships

All suppliers, biospecimen partners and service providers are required commit to the following:

- Comply with all applicable local laws which should include labour, health and safety, environmental and data protection
- Have a zero tolerance for child labour, forced labour and human trafficking
- Respect human rights and donor rights
- How they conduct business should be conducted in a way which has minimal impact on the environment
- All business should be conducted in an ethical and transparent way

### 11.1. Biospecimen Partners

Our biospecimen partner providers are expected to commit to the following:

- Remain transparent with respect to the origin of the human biospecimen samples and their consent status
- Maintain compliance with local and international ethical standards
- Traceability and appropriate storage conditions
- Samples should never be obtained through coercion, deception or illegal activity

If any members of the team raise any concerns that any commitments have been breached, a full investigation will commence, and termination of the partnership may occur effective immediately.

### 11.2 Due Diligence

After introductory discussions ART-Biopharma will take steps to request the following:

- Ethical approvals, ICF templates as well as SOPs for certain processing protocols
- Conduct reputational checks

- Contractual agreements outline the expectations of Biospecimen partnered providers

## 12. Quality, Scientific Expertise and Documentation

ART-Biopharma offers support to our clients from concept to execution with respect to the human biospecimen needs with high quality standards as scientific and operational integrity is non-negotiable. We commit to:

- Following agreed project plans which were discussed and agreed
- Ensure to maintain accurate tracked records of the work undertaken
- Promptly report any deviations, quality issues or suspected non-compliance
- Site audits of our Biospecimen partnered providers

## 13. Reporting Concerns and Non-Retaliation

- If a member of the team witnesses or suspects a violation of this Code of Conduct policy, if any laws are broken or company policy is breached, they should report this immediately via the Director of ART-Biopharma
- Retaliation against any employee who raises concerns or cooperates with an investigation in good faith will not be tolerated. Retaliation of any kind will not be accepted as it is against our policy guidelines and is taken seriously.
- An investigation and follow-up will be conducted for any suspected violation with the utmost privacy
- After investigation has been completed, corrective actions will be addressed where required

## 14. Training, Review and Continuous Improvement

As a small business we use our policies as a method of training, however moving forward we strive to implement annual trainings or briefings on relevant topics pertaining to this policy

ART-Biopharma will continue to review this policy at least annually to make any relevant changes with respect to laws and regulations, whether there are any changes to our risk profile.

#### **15. Failure to comply with this Code of Conduct may result in:**

- Coaching or additional training
- Official written warnings and mandatory corrective actions
- Suspension until a full investigation is completed and termination of employment
- In cases where required legal reporting if serious violations are identified

#### **16. Acknowledgment**

By reading this policy, you confirm that you have understood and agree to comply with what is stated, If you have any questions or concerns, please contact to ask any questions you may have pertaining to any aspects of the policy.