

ART-Biopharma's Whistleblowing Policy

Effective Date: 10.06.2024

Approved By: Dr. David Shahbazian, CEO

1. Purpose

This Policy is intended to encourage and enable all ART-Biopharma's employees, contractors, consultants, and other stakeholders to report concerns about unethical behavior, misconduct, or violations of laws or organizational policies, without fear of retaliation.

2. Applicability

This policy applies to:

- All full-time and part-time employees of Art-Biopharma LLC.
- All contractors and other individuals engaged in remote work on behalf of the company
- Any individual working from home office or remote location under the direction of ART-Biopharma.

3. Biopharma's Whistleblowing Policy Principles

ART-Biopharma is committed to the highest standards of integrity, accountability, and ethical conduct. We expect all individuals associated with our organization to conduct themselves in accordance with applicable laws, regulations, and internal policies.

- Anyone who becomes aware of conduct that they believe to be Illegal or fraudulent, a violation of any organizational policy, a significant threat to public safety or the environment, or an act of gross mismanagement, abuse of authority, or serious wrongdoing is encouraged to report it immediately to:

The CEO directly via email: David.Shahbazian@art-biopharma.com or phone or via a private meeting.

- Reports made under this policy will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation
- ART-Biopharma strictly prohibits any form of retaliation against individuals who make a good faith report of suspected misconduct. Any individual who retaliates against a whistleblower will be subject to disciplinary action, up to and including termination of employment or contract.
- All reports will be assessed and where appropriate investigated promptly and thoroughly. Investigations will be handled objectively and with discretion. ART-Biopharma will determine appropriate corrective action based on the findings.
- While this policy protects whistleblowers from retaliation, individuals who knowingly make false allegations may be subject to disciplinary action.
- ART-Biopharma strictly prohibits retaliation against any individual who, in good faith, reports misconduct. Retaliatory acts-including dismissal, demotion, harassment, or discrimination-will be treated as serious misconduct. Any individual who believes they have been subjected to retaliation should report it immediately through the same reporting principles.

4. Annual Review

This policy will be reviewed annually or as soon as changes in working conditions, laws or risk arise. It will be updated as necessary to reflect best practices, employee feedback, and changes in environmental standards.

5. Summary

This policy complies with the Law of the Republic of Armenia on Whistleblowing (HO-199-N 2017), The Labor Code of the Republic of Armenia and international best practices for whistleblowing.

Periodic feedback and voluntary self-assessments may be used to evaluate effectiveness and identify areas for improvement.



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