

## MMV CODE OF CONDUCT

### 1. Purpose

MMV was established as a not-for-profit foundation in Switzerland in 1999, and its mission is to reduce the burden of malaria in disease-endemic countries by discovering, developing and facilitating the delivery of new, effective and affordable anti-malarial drugs. MMV's vision is a world in which innovative medicines will cure and protect the vulnerable and under-served populations at risk of malaria, and help to ultimately eradicate this terrible disease.

The MMV Code of Conduct seeks to safeguard high standards of behavior and maintain MMV's independence and effectiveness in the pursuit and achievement by MMV of its mission, and to provide a means for MMV Staff Members and stakeholders to report non-compliance with this Code of Conduct and other MMV Policies and Standard Operating Procedures (SOPs).

Steps for reporting non-compliance, misconduct or suspected Fraud related to research, preclinical or clinical activities are addressed more specifically in the SOP GE-06 Non-compliance, fraud and misconduct.

### 2. Principles of Conduct

All Staff Members are expected to comply with applicable laws, regulations, and internationally accepted norms, and to act respectfully and be sensitive to local customs.

MMV's values – Passion, Innovation and Collaboration – and our principles of conduct provide clear guidance for behavior in all of our activities. MMV follows and applies the following principles of conduct:

- Respect
- Integrity
- Transparency
- Excellence

MMV's success depends on the combined talents and performance of its dedicated workforce. All Staff Members and anyone acting on behalf of MMV must comply with this Code of Conduct, regardless of their location or the nature of their work. MMV does not tolerate violations of the Code of Conduct and is committed to handling non-compliance cases appropriately. Wrongdoers will be held accountable.

#### **Respect**

MMV is committed to providing equal opportunity for all Staff Members, and creating a work environment which values respect for others in accordance with the [MMV Equity Policy](#). MMV will not tolerate any discrimination on the basis of personal characteristics such as race, color,

nationality or ethnic origin, gender, marital status, sexual orientation, disability, age, political or religious beliefs.

MMV will not tolerate any form of intimidating or threatening behavior such as harassment or bullying or any other form of inappropriate behavior.

**MMV has a zero-tolerance policy towards sexual exploitation and abuse**, defined as acts of sexual violence, sexual assault, rape, sexual activity with a minor, transactional sex and solicitation of transactional sex (these terms are further defined in the [UN Glossary](#)).

MMV requires that its contracted service providers and partners agree to adhere to these ethical standards.

### **Integrity**

MMV requires all Staff Members to conduct themselves with honesty and integrity. Staff Members are expected to act in good faith, without malice or consideration of personal benefit, and to disclose any actual or potential conflict of interest that may arise, in accordance with MMV's [Conflict of Interest Policy](#).

### **Transparency and Accountability**

MMV aims, in its dealings with its Staff Members, donors, partners and other stakeholders, to act openly and transparently. This means being accountable to donors and partners from whom MMV receives resources, whether financial or "in-kind", and in appropriate reporting and monitoring of all its activities.

### **Excellence**

MMV believes in a culture that is entrepreneurial, professional, performance-driven, and highly ethical. MMV believes in fostering a work environment that rewards collaboration, values diversity of opinion and motivates Staff Members to deliver consistently high performance, have the courage to question conventional wisdom, and embody the principles of this Code of Conduct in their decisions and actions.

## **3. Speaking up**

Staff Members are expected to disclose any event that may adversely affect the vulnerable populations that MMV aims to serve, MMV's stakeholders, MMV's Staff Members and MMV as a whole. Such events include, but are not limited to: Fraud, violations of laws and regulations, failure to follow regulatory compliance guidelines, unethical behaviors or practices, negligence of duty, endangerment to public health or safety, or any wrongdoing that may be harmful to the interests, reputation, operations or governance of MMV and its ability to carry out its mission. In addition, any behavior, in the context of MMV's activities, that is inappropriate, intimidating or threatening must be reported.

By raising compliance concerns, MMV Staff Members help protect themselves, their colleagues, and MMV's interests.

Staff Members are expected to make reports in good faith and must not make false accusations when reporting wrongdoing. False accusations, or intentional failure to disclose serious misconduct, are themselves considered a violation of this policy.

If a Staff Member is uncertain whether a situation should be reported or is unsure about the correct behavior, he/she can seek help and advice.

#### **4. Getting help and advice, Reporting**

Staff Members can seek the advice of, and report non-compliance with this Code of Conduct, through any of the following reporting options:

- their Line Managers
- the General Counsel
- the Head of Human Resources
- or the Help Line (details will be communicated separately)

MMV Line Managers are expected to create an environment of trust that encourages Staff Members to speak up and address compliance concerns. MMV Line Managers are responsible for ensuring that employees reporting non-compliance with this Code of Conduct receive the help and advice they need. MMV Line Managers, in turn, must report all matters and behaviors that violate this Code of Conduct to the General Counsel or the Head of HR.

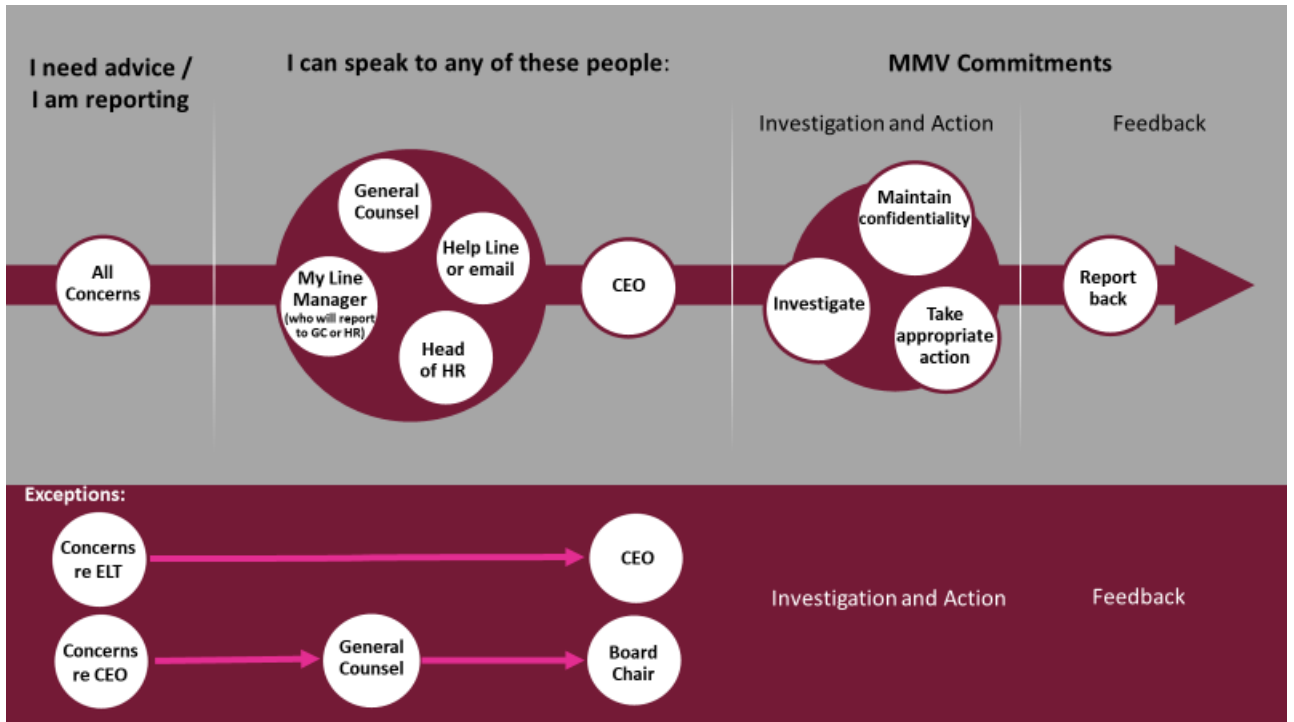
All reports received by the General Counsel, the Head of HR or the Help Line must be reported to the Chief Executive Officer.

Any report of a compliance concern involving a member of the ELT must be reported directly to the Chief Executive Officer.

Compliance reports concerning the Chief Executive Officer must be reported to the General Counsel who will then report to the Chairman of the MMV Board.

In addition, MMV has a dedicated email address that allows MMV Staff Members to report a compliance concern anonymously (details will be communicated separately). Emails are automatically directed to the Chief Executive Officer. If this option is chosen, the Staff Member should provide as much detail as possible to allow for investigation and action.

MMV's service providers and consultants need to report non-compliance to their MMV Project Director or the General Counsel.



## 5. Investigation and Action

MMV recognizes that wrongdoing can have a devastating effect on the affected persons and can also result in significant financial and other long-term business losses, including loss of public trust. All compliance concerns will be taken seriously, with no exceptions. MMV's commitments upon being informed of a compliance concern are as follows:

- Investigate in a professional, systematic and analytical way, ensuring a conflict-free, neutral forum for reports to be resolved
- As much as possible, keep the identities of those who raise concerns, and those who may be implicated in any such report, confidential
- Take appropriate action
- Report back to the person(s) who raised a concern

A Staff Member who raises a compliance concern in good faith acts in the interests of MMV. MMV will not tolerate any retaliation against Staff Members as a result of any report, where the report is made in good faith and is not made maliciously or for personal gain. Any retaliation can and should be reported to the Chief Executive Officer, the Head of Human Resources, or the General Counsel.

The MMV Board will be informed promptly of any violation of this policy that could significantly affect the reputation of MMV.

## 6. Definitions

ELT	Means the Executive Leadership Team of MMV.
Fraud	Means a false representation of a matter of fact - whether by words or by conduct, by false or misleading allegations, or by concealment of what should have been disclosed - that deceives and is intended to deceive.
MMV Board	Is the highest policy and decision-making body of MMV which ensures that MMV's objectives are efficiently executed by the Executive Leadership Team of MMV.
Staff Member	Means a person working under an employment contract with MMV.

## 7. Policy Review

This Policy will be maintained by MMV's Quality Manager, subject to regular review by the ELT and approval by MMV's Chief Executive Officer, MMV's General Counsel and the MMV Board.

## 8. Communication

This Policy is available on MMV's intranet and on MMV's website.