

ODYSSEY THERAPEUTICS, INC.
Code of Conduct and Ethics

I. Introduction

Odyssey Therapeutics, Inc. (together with its subsidiaries, the “**Company**”) requires the highest standards of professional and ethical conduct from its employees, officers and directors. Our reputation for honesty and integrity is key to the success of our business. The Company intends that its business practices will comply with the laws of all of the jurisdictions in which it operates and that honesty, integrity and accountability will always characterize the Company’s business activity. No employee, officer or director may achieve results through violations of laws or regulations or unscrupulous dealings.

This Code of Conduct and Ethics (this “**Code**”) reflects the board of directors’ (the “**Board of Directors**”) and Company’s commitment to a culture of honesty, integrity and accountability and outlines the basic principles and policies with which all employees, officers and directors are expected to comply. Therefore, we expect you to read this Code thoroughly and carefully. This Code applies, in its entirety, to all employees, officers and directors and to certain designated consultants, independent contractors or agents. As a general principle, we also expect parties that provide services on our behalf, such as vendors, consultants or independent contractors, to follow this Code in connection with their work for us.

In addition to following this Code in all aspects of your business activities, you are expected to seek guidance in any situation where there is a question regarding compliance issues with the Company’s policies and/or applicable laws. Compliance with this Code is essential to the continued success of the Company’s business and the cultivation and maintenance of its reputation as a good corporate citizen. Misconduct is never justified, even where sanctioned or ordered by an officer, director or other individual in a position of higher management. No individual, regardless of stature or position, can authorize actions that are illegal, or that jeopardize or violate Company standards. We note that this Code sets forth general principles of conduct and ethics and is intended to work in conjunction with any specific policies and procedures that are covered in the Company’s current and/or future compliance documents or in any separate specific policy statements, and you should refer to those policies and procedures for more detail in the specified context.

Nothing in this Code prohibits you from reporting possible violations of federal or state law or regulation to any governmental agency or entity, including but not limited to the Department of Justice, the Securities and Exchange Commission (the “**SEC**”), the U.S. Food and Drug Administration, Congress and any agency Inspector General, or making other disclosures that are protected under the whistleblower provisions of federal law or regulation. You do not need the prior authorization of the Company to make any such reports or disclosures and you are not required to notify the Company that you have made such reports or disclosures.

II. Conflicts of Interest

The Company recognizes and respects the right of its employees, officers and directors to engage in outside activities that they may deem proper and desirable so long as those activities (“**Outside Activities**”) do not impair or interfere with the performance of their duties to the Company or their

ability to act in the Company's best interests. In most cases, this will mean that you must avoid situations that present an actual or potential conflict between your private interests and the Company's interests.

A conflict of interest exists when private interests, including personal, family, social, financial or outside business interests, interfere in any way with the performance of your responsibilities with respect to the Company. A conflict can arise if you, or an immediate family member, takes actions or has a private interest that can make it difficult for you to perform Company duties objectively, or if you or an immediate family member receive personal benefits that are, or appear to be, improper. Even the appearance of a conflict of interest can damage the reputations of the Company's employees, officers and directors and that of the Company. For example, conflicts of interest may arise if:

- you cause the Company to engage in business transactions with a company that you, your friends or your relatives control or have a financial interest in without having obtained any required prior approvals;
- you are in a position to (i) compete with, rather than help, the Company or (ii) make a business decision not on the basis of the Company's interest but rather for personal advantage;
- you take actions, have personal or family interests, or have outside business interests (such as service on a board or as a consultant of another company, but generally excluding religious, charitable or other community activities to the extent such activities do not interfere with your duties to the Company or violate any other Company agreement or policy) that make it difficult to perform your work or discharge your obligations to the Company effectively; or
- you, or any of your immediate family members, receive, directly or indirectly, improper personal benefits as a result of your position in the Company, including through the receipt of gifts or other items of value.

You are required to act in the Company's best interest and to exercise sound judgment, free from personal interests or other loyalties, and to refrain from activity that causes an actual or potential conflict of interest in violation of this Code.

Any actual or potential conflicts of interest must be reported promptly to the Company's General Counsel (the "**Compliance Officer**"). Further, if you become aware of a conflict or potential conflict involving another employee, officer or director, you should bring it to the attention of the Compliance Officer.

Before any Company employee may engage in any Outside Activity that might give rise to any actual or potential conflict of interest, the employee shall request approval from the Company by providing the Compliance Officer with the following information, in writing:

- a description of the proposed transaction, activity or relationship, including the anticipated time commitment, the nature of the services (if any) to be performed, and the compensation (if any) to be received; and
- a written description of any actual or potential conflict of interest that the proposed transaction, activity or relationship might create.

Any request by an employee or executive officer (other than the Chief Executive Officer) for approval of an Outside Activity will be reviewed by the Compliance Officer and the Chief Executive Officer. Where appropriate, the Chief Executive Officer may approve the employee's or executive officer's involvement in the proposed Outside Activity. Where the request is made by the Chief Executive Officer or a director of the Company, the Compliance Officer will notify the Nominating and Governance Committee of the Board of Directors (the "**Committee**") of the proposed Outside Activity. The Committee will then review the proposed Outside Activity and, if appropriate, approve such Outside Activity. Members of the Committee with an actual or potential conflict of interest shall not participate in the Committee's consideration of such matter. In the event the Chair of the Committee has an actual or potential conflict of interest, the remaining disinterested members of the Committee shall designate a member of the Committee to lead the Committee's consideration of the matter. Any approval granted in accordance with the procedures set forth above will not be considered a waiver of this Code.

III. Corporate Opportunities

When carrying out your duties or responsibilities, you owe a duty to the Company to advance its legitimate interests. Each employee, officer, director, and designated consultant, independent contractor or agent is prohibited from:

- diverting to himself or herself or to others any opportunities that are discovered through the use of the Company's property or information or as a result of their position with the Company unless such opportunity has first been presented to, and rejected by, the Company;
- using the Company's property or information or their position for improper personal gain; or
- competing with the Company.

IV. Public Reporting

Full, fair, accurate and timely disclosure must be made in the reports and other documents that the Company files with, or submits to, the SEC and in its other public communications. This type of disclosure is critical to ensure that the Company maintains its good reputation, complies with its obligations under applicable securities laws and meets the expectations of its stockholders. Individuals responsible for the preparation of these documents and reports and other public communications must exercise the highest standard of care in accordance with the following guidelines:

- accounting records, and the reports produced from those records, must comply with applicable laws;
- accounting records must fairly and accurately reflect the transactions or occurrences to which they relate;
- accounting records must fairly and accurately reflect in reasonable detail the Company's assets, liabilities, revenues and expenses;
- accounting records must not contain any false or intentionally misleading entries;
- no transactions should be intentionally misclassified as to accounts, departments or accounting periods;
- transactions must be supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period;
- employees, consultants and independent contractors must cooperate fully with the Company's accounting department, as well as the Company's independent public accountants and legal counsel, respond to their questions with candor and provide them with complete and accurate information to help ensure that the Company's books and records, as well as the Company's reports filed with the SEC, are accurate and complete;
- no employee should knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of the Company's reports filed with the SEC or knowingly omit (or cause or encourage any other person to omit) any information that is necessary to make the Company's disclosures accurate in all material respects; and
- compliance with the Company's internal control over financial reporting and disclosure controls and procedures is required.

Any employee who becomes aware of any departure from these standards and guidelines has a responsibility to report their knowledge or belief promptly to the Compliance Officer.

V. Confidentiality

Employees, officers, directors, and designated consultants, independent contractors or agents must maintain and protect the confidentiality of information entrusted to them by the Company, or that otherwise comes into their possession, during the course of their employment or while carrying out their duties and responsibilities, except when disclosure is authorized by the Company or legally mandated.

The obligation to preserve confidential information continues even after employees, officers and directors leave the Company or after designated consultants, independent contractors or agents are no longer engaged with the Company.

Confidential information encompasses all non-public information (including, for example, "inside information" or information that third parties have entrusted to the Company) that may be of use

to competitors or may otherwise be harmful to the Company or its key stakeholders if disclosed. Financial information and scientific and clinical data are of special sensitivity and should under all circumstances be considered confidential, except where its disclosure is approved by the Company or when the information has already been publicly disseminated.

In the course of developing new therapies and providing health benefits to our employees, we may acquire or maintain personal data. Personal data is any information that can identify, or can be used to identify, a person. All employees, officers and directors must respect the privacy rights of any person who provides their personal data to us. The Company is also committed to complying with all applicable privacy laws. You are required to protect personal data and to process that data responsibly in accordance with applicable laws and Company policies.

VI. Protection and Proper Use of Company Assets

All employees, officers and directors should promote and ensure the efficient and responsible use of the Company's assets and resources by the Company. Theft, carelessness and waste have a direct impact on the Company's financial results. Any suspected incidents of fraud or theft should be immediately reported to the Compliance Officer for investigation.

Company assets, such as proprietary information, funds, materials, supplies, products, equipment, software, facilities and other assets owned or leased by the Company or that are otherwise in the Company's possession, may only be used for the Company's legitimate business purposes and must never be used for illegal purposes.

Proprietary information includes any information that is not generally known to the public or would be valued by, or helpful to, our competitors. Examples of proprietary information are intellectual property, business, scientific data, clinical data, early-stage programs and targets, R&D and strategic plans and employee information. The obligation to use proprietary information only for the Company's legitimate business purposes continues even after individuals leave the Company.

VII. Insider Trading

Insider trading is unethical and illegal. Employees, officers, directors and designated consultants, independent contractors or agents must not trade in securities of a company, including any company with which the Company does business, while in possession of material non-public information regarding that company. It is also illegal to "tip" or pass on inside information to any other person who might make an investment decision based on that information or pass the information to third parties. The Company has an Insider Trading Policy, which sets forth obligations with respect to trading in the Company's securities.

VIII. Fair Dealing

Each employee, officer and director, in carrying out their duties and responsibilities, should endeavor to deal fairly with each other and the Company's customers, suppliers, vendors and competitors. No employee, officer or director should take unfair advantage of anyone through illegal conduct, manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

IX. Notification of Outside Positions

Directors must notify the Chair of the Committee as soon as practicable prior to becoming affiliated with any law firm or audit firm that provides services to the Company.

Directors and employees must fully disclose all material outside business interests (as determined by the Compliance Officer from time to time), including any and all positions held and interests in both public and privately held companies, and promptly update the Compliance Officer regarding any such interests that could cause another company or entity to become a “Related Person,” as defined in the Company’s Related Party Transactions Policy. Generally, with respect to directors and officers, this disclosure will be made to the Compliance Officer by means of the completion of a D&O questionnaire provided by or on behalf of the Compliance Officer. The Compliance Officer will notify the Chair of the Committee of any such outside business interests.

X. Product Quality

The safety and quality of the Company’s products and services are key to our mission and values. The Company maintains quality and regulatory compliance systems that conform to our internal requirements and comply with applicable laws. These systems are and will be described in quality policies, standard operating procedures and training programs adopted from time to time by the Company. They incorporate a management review process that includes quality audits and system effectiveness reviews.

It is crucial that the Company closely monitors the safety of its products and immediately evaluates any concerns that arise. Any employee who learns of an adverse event, product quality complaint or obtains safety information must report it promptly to the Company’s head of quality.

XI. Relationships with Healthcare Professionals and Patients

The Company interacts with healthcare professionals (“HCPs”) and patients, including patient groups, in many ways, such as medical information communications, research and development and educational efforts. We are committed to the highest standards of integrity and compliance with applicable laws and regulations in every aspect of our relationships with HCPs and patients.

Whenever we hire an HCP or patient as a consultant, speaker, advisory board member, clinical investigator or in any other capacity to provide services for the Company, we are committed to selecting that individual based on his or her capabilities, experiences, qualifications, expertise or other appropriate standard directly related to the identified purpose. Also, there must be a legitimate business purpose for the services. The purpose of the arrangement must not be an inducement for an HCP to recommend Company products or participation in the Company’s clinical trials or a reward for doing so. In addition, we must take special care to avoid any improper influencing of HCPs and patients. We are committed to not offering anything of value to HCPs with an intent to influence their medical judgment or to patients with an intent to influence their decision to use a Company product or participate in the Company’s clinical trials.

We are committed to complying with all laws, regulations and industry codes requiring the disclosure of payments and other transfers of value to HCPs. We develop and uphold adequate systems and processes to ensure timely, accurate and complete disclosures.

XII. Compliance with Laws, Rules and Regulations

Compliance with all laws, rules and regulations applicable to the Company, including any organization or body that regulates the Company, is critical to our reputation and success. All employees, officers, directors and designated consultants, independent contractors or agents must respect and obey the laws of the cities, states and countries in which the Company operates and avoid even the appearance of impropriety.

Employees, officers, directors or designated consultants, independent contractors or agents who fail to comply with this Code and applicable laws will be subject to disciplinary measures, up to and including discharge from the Company or removal from the Board of Directors.

XIII. Environmental, Health and Safety

The Company is sensitive to the environmental, health and safety consequences of its operations. Accordingly, the Company expects compliance with all applicable federal and state environmental laws and regulations, including, among others, the Clean Air Act, the Federal Water Pollution Control Act, the Resource Conservation and Recovery Act and the Occupational Safety and Health Act. If any individual has any doubt as to the applicability or meaning of a particular environmental, health or safety regulation, he or she should discuss the matter with the Compliance Officer.

The Company is committed to keeping its workplaces free from hazards. You should report any accidents, injuries or unsafe equipment, practices or conditions immediately to a supervisor or other designated person. Threats or acts of violence or physical intimidation are prohibited.

You must not engage in the use of any substance that could prevent you from discharging your work duties and responsibilities safely and effectively.

XIV. Discrimination and Harassment

The Company values a diverse working environment and is committed to providing equal opportunity in all aspects of our business. Abusive, harassing or offensive conduct is unacceptable, whether verbal, physical or visual. Examples include derogatory comments based on racial or ethnic characteristics and unwelcome sexual advances. The Company encourages the reporting of discrimination and harassment when it occurs and requires certain managerial employees to report to the Compliance Officer or to the head of Human Resources any occurrences of discrimination or harassment.

XV. Company Records and Document Retention

Records created, received or used during the conduct of Company business, including all communications sent or received using the Company's email system, are at all times the property of the Company wherever those records may be located. At any time, the Company and, in certain circumstances, third parties (including government officials), may review, without prior notice to personnel, any and all Company records, including records marked "Personal" or "Private."

Any records that you create and store using Company accounts or systems or relating to the Company are subject to this Code and may be demanded by third parties during the course of

litigation or a government investigation and, in the case of records sent outside the Company, subject to the records retention policies of the recipients.

You should, therefore, avoid discriminatory remarks, harassment and threats of violence or similar inappropriate or unlawful conduct in all communications, including email, instant messaging, voice mail messages, text messages, video recordings and informal notes or interoffice memos. Records should be retained and destroyed in accordance with the Company's records retention policies and, as applicable, with Company guidelines regarding the retention of certain personnel documents.

XVI. Use of Electronic Media

The Company has developed policies to ensure that you understand the rules governing your use of the Company's computer network, and options for email and voicemail or other messaging services, Internet access or other use of electronic media. All Company equipment and all cloud-based storage, including computers and computer systems, computer software, electronic storage devices, cellphones or other mobile devices, email, voicemail and other information technology assets are for business use only. The Company at all times retains the right to access and search all such electronic media or other items contained in or used in conjunction with the Company's computer, email, voicemail and Internet access systems and equipment with no prior notice.

Like the Company's computer network, email and voicemail services, access to Internet services such as web-browsing or newsgroups are provided to employees by the Company only for business use. Any personal use must be infrequent and must not involve any prohibited activity, interfere with the productivity of the employee or their coworkers, consume system resources or storage capacity on an ongoing basis or involve large file transfers or otherwise deplete system resources made available for business purposes.

Your messages using Company accounts or systems or relating to the Company's business and computer information are considered Company property and, consequently, employees should not have an expectation of privacy in the context of computer, email or other messaging service and voice mail use. Unless prohibited by law, the Company reserves the right to access and disclose this information as necessary for business purposes. Use good judgment and do not access, send messages or store any information that you would not want to be seen or heard by other individuals.

Unauthorized posting or discussion on the Internet of any information concerning the Company's business or prospects is prohibited. You may not discuss the Company's business or prospects on social media sites (including LinkedIn, Facebook and X (formerly Twitter)) or in blog posts, or in response to news reports or articles, regardless of whether you use your own name or a pseudonym, unless authorized by the Company. However, you may repost, share or "like" content that is issued or approved by the Company (such as social media posts by the Company) as long as any accompanying commentary is brief, factual and non-substantive, and does not go beyond the content of the Company-approved communication.

XVII. Political Activities and Contributions

The Company respects the right of each of its employees and directors to participate in the political process and to engage in political activities of their choosing; however, while involved in their personal and civic affairs, employees and directors must make clear at all times that their views and actions are their own, and not those of the Company. Neither employees nor directors may use the Company's resources to support their choice of political parties, causes or candidates.

The Company may occasionally express its views on local and national issues that affect its operations. In such cases, Company funds and resources may be used, but only when permitted by law and by Company guidelines. The Company may also make limited contributions to political parties or candidates in jurisdictions where it is legal and customary to do so. The Company may pay related administrative and solicitation costs for political action committees formed in accordance with applicable laws and regulations. Any use of Company resources for the Company's political activities, including contributions or donations, requires advance approval by the Company's Compliance Officer.

XVIII. Business Gifts and Entertainment

Business gifts and entertainment are often customary courtesies designed to build goodwill among business partners and clients. However, issues may arise when these courtesies compromise, or appear to compromise, the recipient's ability to make objective and fair business decisions. In addition, issues can arise when the intended recipient is a government official. Offering or receiving any gift, gratuity or entertainment that might be perceived to unfairly influence a business relationship should be avoided. These guidelines apply at all times, do not change during traditional gift giving seasons, and apply equally to employees, officers or directors offering gifts and entertainment to, or receiving gifts and entertainment from, the Company's business associates.

The value of permitted gifts should be nominal, both with respect to frequency and monetary amount. Frequent gifting to a recipient may be perceived as an attempt to create an obligation to the giver and is therefore inappropriate. Likewise, business entertainment, such as meals or invitations to sporting or cultural events, should be moderately scaled and intended only to facilitate legitimate business goals. The following questions may provide guidance in the instance of doubt:

- Is the action legal?
- Does the action raise doubts or concerns?
- Should another individual be consulted?
- Is the action clearly business-related?
- Is the action or gift moderate, reasonable, and in good taste?
- Would public disclosure of the action or gift embarrass or harm the Company?
- Is there an expectation of reciprocation or favors?

Strict rules apply when the Company does business with governmental agencies and officials, whether in the U.S. or in other countries, as discussed in more detail below.

Because of the sensitive nature of these relationships, you must seek approval from the Compliance Officer before offering or making any gifts or hospitality to government officials or employees.

XIX. Compliance with International Business Laws

Certain U.S. laws, rules and regulations extend to our activities outside of the United States. Employees, officers and directors must comply with laws, rules and regulations applicable to international business activities, including:

- U.S. embargoes, which generally prohibit U.S. companies, their subsidiaries and their employees from doing business with, or traveling to, countries subject to sanctions imposed by the U.S. government, as well as engaging in any dealings with designated parties who are identified on economic sanctions lists.
- U.S. export controls, which restrict exports from the U.S. and re-exports from other countries of goods, software and technology to some countries, and prohibit transfers of U.S.-origin items to denied persons and entities.
- U.S. and foreign import and customs laws, which govern the lawful importation of goods into a country, including requirements relating to tariff classification, customs valuation, country-of-origin determinations, duty payments, recordkeeping, and compliance with applicable trade remedies.
- Anti-boycott regulations, which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person.

XX. Bribery and Corruption

Employees, officers and directors must comply with all applicable laws prohibiting bribery, corruption and kickbacks, including laws prohibiting improper payments to domestic and foreign officials, such as the U.S. Foreign Corrupt Practices Act (the “FCPA”).

The FCPA prohibits an offer, payment, promise of payment or authorization of the payment of any money or thing of value to a foreign official, foreign political party, official of a foreign political party or candidate for political office to induce or influence any act or decision of such person or party or to secure any improper advantage. The FCPA prohibits this type of conduct whether done directly or indirectly through an agent or other intermediary.

As a result, no payment may be made to a foreign official even for non-discretionary action without first consulting with and obtaining written authorization from the Compliance Officer. If a facilitating payment is authorized, the payment must be accurately and fairly recorded in the Company’s books, records and accounts.

A violation of the FCPA is an offense that potentially subjects the Company to substantial fines and penalties and any employee, officer, director, or stockholder acting on behalf of the Company to imprisonment and fines. The FCPA prohibits the Company from paying, directly or indirectly, a fine imposed upon an individual pursuant to the FCPA. Violation of this section of this Code may result in disciplinary actions up to and including discharge from the Company or removal from the Board of Directors.

The FCPA further requires compliance by the Company with record keeping and internal controls requirements. The Company must maintain financial records that, in reasonable detail, accurately and fairly reflect transactions and dispositions of corporate assets. In particular, all bank accounts that receive or disburse funds on behalf of the Company shall be properly authorized and any such transactions recorded on the official books and records of the Company. In addition, the Company must maintain a system of internal controls sufficient to provide reasonable assurances that the Company's assets are used only in accordance with directives and authorizations by the Board of Directors and senior management, and that checks and balances are employed to prevent the bypassing or overriding of these controls.

While this section focuses primarily on foreign officials, this Code equally prohibits bribery of domestic officials and commercial or private sector parties.

XXI. Whistleblower Policy and Employee Reporting

The Company proactively promotes ethical behavior and it is the responsibility of each employee, officer and director or any designated consultant or independent contractor to promptly report evidence of illegal or unethical behavior, or violations of this Code, to their supervisor, anyone in management, the Compliance Officer, the Chair of the Audit Committee or another independent director designated by the Board of Directors, as appropriate.

If a complaint involves an officer, director or the Compliance Officer, then the concern may be directed to the Chair of the Audit Committee or another independent director designated by the Board of Directors. Whistleblower reports that concern accounting, internal accounting controls, or auditing matters should be simultaneously reported to the Compliance Officer and the Chair of the Audit Committee.

To allow for proper assessment, any report should be factual rather than speculative and should provide as much specific information as possible, including names, dates, places and events that took place. Both oral and written reports will be considered.

Reports may be submitted anonymously if the employee desires. All reports of possible violations, whether or not submitted anonymously, will be kept confidential to the extent possible. In some instances, however, the Company may be unable to obtain follow-up details from you that may be necessary to investigate the matter if you decide to remain anonymous.

To facilitate the reporting of concerns as contemplated by this Code, the Company maintains a reporting hotline. You can access the reporting hotline to report a concern as follows:

- To submit a report via phone, dial (877) 832-6469 in the United States and Canada or (800) 603-2869 outside the United States; and

- To submit a report online, visit the following website: <https://report.syntrio.com/odysseytx>.

Once a report is made and received, the Company will investigate promptly as appropriate. All employees, officers, directors, consultants and independent contractors are expected to cooperate candidly with relevant investigatory procedures. Appropriate remedial action may be taken, based on the outcome of any such investigation.

The Company has a no-tolerance policy for retaliation against individuals who raise good faith compliance, ethics or related issues. The Company does not tolerate retaliation against anyone who in good faith raises a concern or provides information in connection with an investigation. Retaliation can include a denial of benefits, termination, demotion, suspension, threats, harassment or discrimination.

It is unacceptable to file a report knowing it to be false.

XXII. Compliance with and Amendments of this Code

Failure to comply with this Code or applicable laws, rules or regulations may result in disciplinary measures, including discharge from your position with the Company or removal from the Board of Directors. Violations of this Code may also constitute violations of law and may result in civil or criminal penalties for such person, such person's supervisors or the Company. The Board of Directors will determine, or designate appropriate persons to determine, appropriate actions to be taken in the event of a violation of this Code by any officer or director. In determining what action is appropriate in a particular case, the Board of Directors or its designee may consider the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation was intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action and whether the individual in question had committed other violations in the past. The Compliance Officer will determine appropriate actions to be taken in the event of a violation of this Code by any employees who is not an officer.

This Code cannot, and is not intended to, address all of the ethical complexities that may arise during the course of employment or association with the Company. There will be occasions where circumstances not covered by policy or procedure arise and where a judgment must be made as to the appropriate course of action. In these circumstances, the Company encourages common sense decision-making, and consultation with a manager, the head of Human Resources, or the Compliance Officer for guidance. Contact information is provided below in "*Compliance and Contact Details*."

Any material amendment of this Code will be made only by the Board of Directors and will be promptly disclosed as required by applicable U.S. securities laws and the rules and regulations of the exchange on which the Company's shares are traded.

XXIII. Compliance and Contact Details

Confidential Advice

If you think that an actual or possible violation of this Code has occurred, it is important to report your concerns immediately through any of the channels described in this Code. If you do not feel comfortable discussing the matter with your supervisor, manager or the head of Human Resources, or if you prefer to report the matter directly, please contact the Compliance Officer. You may also submit a report anonymously through the Company's reporting hotline described above.

The Company strives to ensure that all questions or concerns are handled fairly, discreetly and thoroughly.

Waiver

Any waiver of this Code for the Company's principal executive officer, principal financial officer, principal accounting officer or controller (or persons performing similar functions), or any other executive officer (as defined Rule 16a-1(f) under the Securities Exchange Act of 1934, as amended) or any director (i) will be made only by a majority of the disinterested members of the Board of Directors or the Committee and (ii) shall be disclosed to the Company's securityholders within four business days in accordance with applicable U.S. securities laws and the rules and regulations of the exchange on which the Company's shares are traded.

Any waivers of this Code for other employees may be made by the Compliance Officer, the Board of Directors or, if permitted, the Committee.

Website

The most current version of this Code will be posted and maintained on the Company's website. The Company's Annual Report on Form 10-K shall disclose that this Code is maintained on the Company's website and shall disclose that substantive amendments and waivers will also be posted on the Company's website.

Adopted on April 14, 2026 and effective as of the closing of the initial public offering of the Company's common stock