

**PHARVARIS**

CODE OF  
**CONDUCT AND ETHICS**





## Our Mission

**Pharvaris** aims to develop novel, oral alternatives that improve the standard of care for people living with HAE.



## Our Vision

**Driven** by our values, Pharvaris is a leader in bradykinin-mediated diseases, aiming to deliver effective, safe and easy to administer therapies.

## Our Legacy and Values

Pharvaris aims to provide novel oral alternatives that improve the standard of care for people living with HAE. Pharvaris is a leader in bradykinin-mediated diseases and our team has a rich history in the rare disease space. Pharvarians are driven by our values:



### CONSIDERING OTHERS CARE-FULLY

- Consider all those impacted by our Mission and what we do
- Lead with empathy and consider implications of our actions on others
- It's always "We" not "I"
- Create the company around the right people



### LEADING WITH TRUST

- Trust and respect expertise, experience and decisions made
- Be comfortable with vulnerability and committed to being real, authentic and transparent
- Know it's ok to take appropriate risks and sometimes fail, and when necessary to ask for help
- Take ownership, responsibility and always take the initiative



### ENSURING RIGOR AND DIVERSITY OF THOUGHT

- Prioritize rigorous, well-informed decision making based on robust critical thinking, pragmatism and productive challenge
- Act with professionalism and bring depth of experience and knowledge
- Be open-minded and non-judgmental, encouraging and considering diverse perspectives, opinions and ideas



### CONTRIBUTING FREELY

- Have the freedom to contribute, knowing we will be listened to, and recognized everyone has a responsibility to speak up
- Be free and expected to think differently and creatively
- Have the freedom to work in a way which enables us to be our best



## MESSAGE FROM CEO

Berndt Modig, Chief Executive Officer, Director

**As Pharvarians, each of us has a responsibility to act responsibly. Maintaining Pharvaris' reputation and integrity is essential to realize our mission of innovating to improve the standard of care for people living with HAE.**

Pharvaris takes pride in fostering a culture of compliance. Our Vision, Legacy and Values, Mission, and this Code of Conduct provide the best guidance for our decisions and actions. Pharvarians have a responsibility to know, understand, and follow the policies that are fundamental to how we conduct our daily work. The Code of Conduct (the "Code") sets forth what Pharvaris expects of you and what our stakeholders expect of us. It provides important guidance as to how we should conduct ourselves in our daily work, as well as clear expectations about what we should expect from our colleagues and from Pharvaris. We also expect that those with whom we do business will follow the Code.

The key to compliance is exercising good judgment. This means following the spirit of the Code, doing the right thing, and acting responsibly at all times.

While the Code provides a roadmap, it is not intended to address every situation or set forth every rule, procedure or policy of Pharvaris, and it is not a substitute for the responsibility of each of us at Pharvaris to exercise good judgment and common sense. If you have further questions, the Code directs you to additional resources. Please read it carefully.

Thank you for your commitment to supporting our culture of compliance. It is the only way to earn and maintain the trust of people living with HAE, the public, our shareholders, and customers.

A handwritten signature in black ink, appearing to read "B. Modig". The signature is fluid and cursive.

**Berndt Modig**  
Chief Executive Officer, Director

Pharvaris reserves the right, in its sole discretion, to modify any aspects of the compliance program, including, without limitation, this Code of Conduct and other Company policies, at any time, for any reason, and with or without notice. If there is a conflict between this Code and a specific policy, the policy currently in effect will govern.

# TABLE OF CONTENTS

|   |           |  |           |
|---|-----------|--|-----------|
| <b>Our Mission, Vision, Legacy and Values</b> | <b>2</b>  | <b>4. How we Conduct Business</b>                              | <b>14</b> |
| <b>Message from CEO</b>                       | <b>3</b>  | Anti-Bribery and Anti-Corruption                               | <b>14</b> |
| <b>1. Overview of Code of Conduct</b>         | <b>5</b>  | Antitrust and Unfair Competition                               | <b>15</b> |
| Responsibilities                              | <b>6</b>  | Conflicts of Interest/Corporate Opportunities                  | <b>15</b> |
| Additional Responsibilities of Managers       | <b>6</b>  | Government Officials   | <b>16</b> |
| Disciplinary Action                           | <b>7</b>  | International Business Practices                               | <b>16</b> |
| <b>2. Reporting Concerns</b>                  | <b>8</b>  | Insider Trading  | <b>16</b> |
| Reporting                                     | <b>8</b>  | <b>5. Accurate Retention of Business Records</b>               | <b>17</b> |
| Business Conduct Hotline                      | <b>9</b>  | <b>6. Public Reporting Obligations</b>                         | <b>18</b> |
| <b>3. Respect</b>                             | <b>10</b> | <b>7. Additional Information about Compliance at Pharvaris</b> | <b>19</b> |
| Workplace                                     | <b>10</b> |  |           |
| Respect the Environment                       | <b>10</b> |  |           |
| Diversity and Inclusion                       | <b>10</b> |  |           |
| No Tolerance for Harassment or Discrimination | <b>11</b> |  |           |
| Health & Safety                               | <b>11</b> |  |           |
| Environment                                   | <b>11</b> |  |           |
| Protection of Personal Information            | <b>11</b> |  |           |
| Use of Pharvaris Property and Resources       | <b>12</b> |  |           |
| Confidential Information                      | <b>12</b> |  |           |
| Media & Communication                         | <b>13</b> |  |           |

1.0

# OVERVIEW OF OUR CODE OF CONDUCT AND ETHICS

Pharvaris is committed to conducting its business in accordance with the highest business, ethical, moral and legal standards, in good faith, with due care and in the best interests of the Company and its stakeholders.

This Code of Business Conduct (“Code”) provides general principles and information on your basic ethical and legal responsibilities. These principles apply to all directors, officers and personnel of Pharvaris N.V., and each of its subsidiaries and affiliates (referred to herein as the “Company” or “Pharvaris”). Unless the context indicates otherwise, the term “Personnel” as used in this Code includes Pharvaris’ officers, directors and employed staff, as well as consultants, external workers, secondees, and temporary workers.

This Code is not intended to address every situation or set forth every rule, procedure or policy of Pharvaris, and it is not a substitute for the responsibility of Company Personnel to exercise good judgment and common sense. If you have questions about how to apply the Company’s business standards, policies or procedures you should seek clarification from your manager or, if necessary,

from the Company’s Chief Legal Officer. If a director has a question about the Company’s standards, policies, procedures or applicable law, he/she should contact the Chief Legal Officer or, if the question concerns the Company’s compliance policies, the Chief Compliance Officer, or either of their designees.

This Code is posted in English on the [Governance Documents](#) page of the Company’s [website](#).

## 1.1 Responsibilities

All Company Personnel are expected to follow the law and Company policies as they conduct business on behalf of Pharvaris. While this Code of Conduct has been written to familiarize you with many of the policies that apply at Pharvaris, it is not a substitute for following each policy that applies to your specific job. We all need to understand the specific policies that apply to our work and our roles. Check with your function and your manager to learn about additional job-specific information that you need to know. Remember, no written policy or code on its own can guarantee compliance with the law or ethical decision-making. Each of us must do our part, including:

- Act with honesty and integrity at all times on behalf of Pharvaris.
- Follow the rules: Become familiar with, and conduct Company business in compliance with, applicable laws and Pharvaris policies;
- Respect others: Treat fellow personnel, government officials, our business partners, customers, suppliers and competitors in an honest and fair manner, with integrity;
- Protect the Company: Safeguard and properly use Company proprietary information, assets and resources, as well as those of our customers, vendors and business partners, which are entrusted to us.
- Maintain confidentiality of the Company's non-public information.
- Avoid conflicts of interest: Be able to identify and appropriately handle actual or apparent conflicts of interest and avoid situations where personal interests are, or appear to be, in conflict with Company interests;
- Ask: If you are unsure about what to do or have questions about the law, a policy, ethics or other compliance issues, ask your manager, the Chief Compliance Officer or Chief Legal Officer.

- Report: Take the initiative to promptly report in good faith any violation or possible violation of this Code or Company policies in accordance with the reporting procedures set forth in this Code. If someone asks you or pressures you to do something that might be a violation, report that also and contact the Compliance Hotline.

## 1.2 Additional Responsibilities of Managers

Managers have additional responsibilities. As a Manager at Pharvaris, we trust that you take steps to promote compliance and prevent violations in the areas you manage. Managers are expected to:

- Lead by example: Serve as a positive role model and encourage others to follow this Code and other Company policies.
- Foster a culture of compliance and ethics through personal leadership. Never give others the impression that it is acceptable to ignore our policies or skip steps. Do not create or tolerate an environment where Company Personnel feel pressured to bend rules.
- Ensure that your direct reports complete all corporate and job-specific compliance training. On a regular basis, managers must review the relevant policies and trainings with their direct reports. In addition, managers are expected to ensure the vendors, consultants, external workers, secondees, and temporary staff working for their function act in a manner consistent with this Code and policies that apply to them.

- Last, be proactive and take steps to prevent problems before they happen; do not condone problems as they arise; and report them appropriately. Foster a culture where Company Personnel feel comfortable in raising concerns. Be responsible for reporting violations you suspect or that others (not just your direct reports) share with you.

### 1.3 Disciplinary Action

All Company Personnel are required to adhere to the principles and guidelines contained in this Code in all material respects. Failure to uphold the standards of this Code will result in disciplinary action, up to and including termination of employment, and if warranted, legal proceedings. If you have knowledge of or suspect a situation that you believe may violate or lead to a violation of this Code, please follow the reporting guidelines described in Section 2 of this Code. .



# REPORTING CONCERNS

## 2.1 Reporting

Pharvaris requires that all Company Personnel comply with all laws, rules and regulations applicable to the Company wherever it does business. You are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules and regulations and to ask for advice when you are uncertain about them.

All Company Personnel have a responsibility to protect Pharvaris from unethical behavior and policy violations. If you become aware of the violation of any law, rule or regulation by the Company, whether by its employees, officers, directors or any third-party doing business on behalf of the Company, it is your responsibility to promptly report the matter. When issues or concerns are reported, we will look into the matter, take timely and appropriate action, and make corrections, if required. The earlier potential issues are raised, the sooner they may be resolved.

You have several options for how to report a potential or suspected violation. You should choose one of the following options, depending on the nature of the violation:

1. Bring it to the attention of your manager, or a member of the executive committee. If you prefer not to go to your manager, or the concern was not adequately addressed by your manager, other options may be available, including reporting to the Chief Compliance Officer or Chief Legal Officer.
2. Reports relating to banking, accounting, finance, internal accounting controls, auditing, bribery or anti-corruption, or antitrust/competition violations may be made directly, by phone, email or mail, to the Chief Legal Officer, the Chief Financial Officer, or the Chair of the Audit Committee.
3. Additional reporting options include the Compliance Hotline as noted below in Section 2.2, or the dedicated compliance webform at: <https://www.whistleblowerservices.com/PHVS>. The Compliance Hotline is operated by an independent third party and is available 24 hours and 7 days a week.

Information provided will be treated as confidential to the extent reasonably possible, subject to applicable law. You are encouraged to identify yourself when making a report as that will help Pharvaris conduct the most thorough investigation. It may be more difficult or impossible for Pharvaris to thoroughly investigate anonymous reports. If, however, you are uncomfortable identifying yourself, you may report anonymously, unless anonymous reporting is prohibited by local policy or law.

To the extent that the Dutch Act on the Whistleblowers' Institute (*Wet Huis voor Klokkeluiders*) is applicable, Company Personnel may also turn to the Whistleblowers' Institute (*Huis voor klokkeluiders*), subject to and in accordance with the provisions of such Act.

Regardless of how you make a report, you may do so without fear of any form of retaliation, as Pharvaris prohibits retaliation against employees based on their reporting under this policy. Pharvaris will take prompt disciplinary action against any Company Personnel who retaliates against another Company Personnel for making a report, including possible termination of employment or consulting agreement subject to applicable law. Of course, false and malicious reports will not be tolerated and are subject to appropriate disciplinary action subject to applicable law.

It is Pharvaris' policy to employ an objective and thorough process to investigate and apply remedial measures to violations of this Code, applicable law, or Pharvaris policies. When making a report, employees are expected to promptly provide a specific description of the violation that they believe has occurred, including any information they have about the persons involved and the time of the violation. Pharvaris will carefully investigate all reported violations promptly and take appropriate and necessary actions in compliance with applicable law.

Pharvaris expects your cooperation in investigations. Because it is important that investigations be conducted in accordance with applicable law, neither the reporting Company Personnel nor his or her manager should conduct any preliminary investigation, unless directed to do so by the Chief Legal Officer.

## 2.2 Compliance Hotline

Pharvaris' Compliance Hotline operates 24 hours a day, every day of the year. Anonymous reporting is permitted, except where limited by local law. Please check the Compliance Hotline website for country-specific restrictions and limitations.

- To report via telephone: **+ 1 (877) 657-7662**
- To report via secure webform:  
<https://www.whistleblowerservices.com/PHVS>



# RESPECT

## 3.1 Workplace

Pharvaris is committed to providing Company Personnel with a safe and healthy work environment. Company Personnel must abide by all safety rules and practices and assume responsibility for taking the necessary precautions to protect oneself and one's co-workers. Company Personnel are also responsible for immediately reporting accidents, injuries and unsafe practices or conditions, and for taking appropriate, timely action to correct unsafe conditions.

## 3.2 Respect the Environment

Pharvaris is committed to protect the environment by preventing and minimizing, to the extent possible and practicable, the environmental impact of its activities and products through appropriate design, manufacturing, distribution and disposal practices.

Pharvaris also expects all Company Personnel to take individual responsibility in protecting the environment while performing their activities for Pharvaris.

If you become aware of or reasonably suspect any violation of environmental law or any attempt at concealing such a violation, you must promptly report the matter to your manager, who shall consult with the appropriate level of management and/or, if required, the

LECO Team. If such manager is the culprit (or alleged culprit) of the violation or concealment concerned, you may report the matter directly to the Chief Compliance Officer and/or Chief Legal Officer.

Company Personnel must cooperate fully with any investigation by Pharvaris into an environmental incident, as well as any subsequent corrective actions.

## 3.3 Diversity and Inclusion

Pharvaris is committed to creating a workplace culture that supports a diverse, multicultural workforce, aims to treat individuals fairly, and provides an inclusive environment where all Company Personnel are empowered to contribute and succeed. Pharvaris is committed to the fair and equal treatment of all Company Personnel and all people who seek employment at Pharvaris, including equal opportunities for development and advancement. Pharvaris complies with all applicable employment and equal treatment laws, including laws against discrimination in all aspects of employment, including recruiting, hiring, compensation, promotion and termination.

### 3.4 No Tolerance for Harassment or Discrimination

Company Personnel are expected to deal fairly, honestly, ethically and respectfully with each other, and with Pharvaris' customers, suppliers, other business partners, and competitors.

Pharvaris is committed to the principles of non-discrimination, respect for human rights and individual freedoms, including freedom of speech. Behavior that creates an intimidating, hostile or offensive work environment will not be tolerated. To that end, Company Personnel:

- Shall maintain a work environment where personal dignity of the individual is respected;
- Shall not discriminate or harass on the basis of race, gender, culture, appearance, national origin, religious belief, political opinion, sexual preference or on the basis of any other personal characteristic;
- Shall not engage in coercion or intimidation in the workplace; and
- Shall not knowingly work with companies or organizations that use forced or child labor.

### 3.5 Health & Safety

Pharvaris is committed to protect and promote the health, safety and security of all Company Personnel.

Without prejudice to any requirements under applicable laws and regulations, Company Personnel shall participate in health and safety training activities to the extent relevant and appropriate in relation to the performance of their activities for Pharvaris.

It is forbidden to illegally possess or consume drugs while working on Pharvaris premises or otherwise conducting Pharvaris business. Company Personnel may not be impaired by drugs or alcohol at work. Pharvaris is committed to a workplace free of violence. Violent or threatening acts are not permitted and will not be tolerated.

If any Company Personnel becomes aware of a health or safety incident, or reasonably suspects a health and safety risk, you must report this promptly to your manager, who shall consult with the appropriate level of management.

### 3.6 Environment

All Company Personnel are responsible for Pharvaris' compliance with environmental laws and regulations. Each individual has a duty to act in a responsible manner toward the environment. This means that each individual must, to the best of their ability, minimize the impact Pharvaris' products, processes and services have on the environment and act in accordance with applicable environmental rules and regulations.

### 3.7 Protection of Personal Information

The lawful processing of Personal Information is important to Pharvaris' business activities. Pharvaris, and parties acting on Pharvaris' behalf, process various types of Personal Information about patients, caregivers, consumers, clinical trial participants, healthcare professionals (e.g., physicians or nurse practitioners), Company Personnel, and others for a variety of lawful business purposes.

We are required by applicable privacy and data protection laws to implement appropriate safeguards to protect Personal Information. Unlawful or unauthorized use or disclosure of Personal Information could adversely affect the individuals whose information is compromised, as well as potentially expose Pharvaris to legal and regulatory risks, financial damage, and reputational harm. As such, all reported privacy incidents shall be thoroughly investigated and appropriately addressed in a prompt manner.

Everyone at Pharvaris worldwide has a role to play in protecting, securing, and appropriately processing (e.g., collecting, using, accessing, viewing, storing, transferring) Personal Information. For additional guidance, please refer to Pharvaris' Global Policy on Data Protection.

### 3.8 Use of Pharvaris Property and Resources

Company Personnel shall take appropriate measures to ensure the efficient and legitimate use of property and resources of Pharvaris and shall promptly report to their manager any misuse of Company Group property or resources.

Without proper authorization from their manager, Company Personnel shall not:

- obtain, use or divert property or resources of Pharvaris for personal gain; or
- materially alter, remove or destroy property or resources of Pharvaris or use services provided by Pharvaris, except in the ordinary course of performing activities for Pharvaris.

Computers, laptops, handheld devices, e-mail and internet access are provided by Pharvaris primarily for business use. Company Personnel must lock the screen of any device used to access Pharvaris information when such device is left unattended. Company Personnel shall not

download any data at work that is unprofessional or inappropriate for use or viewing in a business context.

Company Personnel shall promptly report to their manager any situation in which data relating to Pharvaris has been compromised or when such Company Personnel suspects or becomes aware of any breach of data relating to Pharvaris, including the loss or theft of a computer, laptop or handheld device.

Pharvaris property also includes intangible assets such as intellectual property. Pharvaris intellectual property may also include Pharvaris work product. Pharvaris should promptly disclose any invention related to Pharvaris' business, so that it may receive the same protection as other intellectual property of Pharvaris.

### 3.9 Confidential Information

Company Personnel must maintain the confidentiality of information entrusted to them by Pharvaris or other companies with which we have business relationships, including our suppliers, customers, collaborators and partners, except when disclosure is legally mandated or specifically authorized by Pharvaris or applicable law. Unauthorized disclosure of confidential information is prohibited.

Company Personnel should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to Pharvaris or another company, is not communicated within Pharvaris except to those who have a need to know such information to perform their responsibilities for Pharvaris.

Except as described in the preceding paragraph, Company Personnel must not discuss internal Pharvaris matters with, or disseminate internal Pharvaris information to, anyone outside Pharvaris, except as required in the performance of their duties and, if appropriate, after a confidentiality agreement is in place. This prohibition

applies particularly to inquiries concerning Pharvaris from the media, market professionals (such as securities analysts, institutional investors, investment advisers, brokers and dealers) and security holders. All responses to inquiries on behalf of Pharvaris must be made only by Pharvaris' authorized spokespersons. If you receive any inquiries of this nature, you must decline to comment and refer the inquirer to your line manager or one of Pharvaris' authorized spokespersons.

Nothing in this or any other section of this Code or any other Pharvaris policy is intended to restrict any rights Company Personnel may have under law to make protected disclosures including disclosing information about working conditions and the terms and conditions of employment, or to make complaints to relevant legal authorities.

### 3.10 Media & Communication

Pharvaris discloses information to the public only through specific channels.

Company Personnel are expected to conduct themselves in a manner that reflects positively on Pharvaris. When expressing personal views in any media where it is apparent that you work for Pharvaris, including television, radio, chat rooms, forums, social media platforms and other electronic media, it should be clear that such statements are personal and do not represent Pharvaris' point of view.

Unless you receive proper authorization to speak on behalf of Pharvaris by the appropriate level of management, Company Personnel should decline to comment in



response to any media, market professionals (such as securities analysts, institutional investors, investment advisers, brokers and dealers) or security holders, requesting information about matters relating to Pharvaris, regardless of whether the request is made off the record, for background, or confidentially.

At times Pharvaris may explicitly allow Company Personnel to repost Company communications. Any alteration of approved communications must be approved by the LECO and Communications teams prior to posting.

Remember that regulations related to product labeling and promotion, and rules about privacy, vary by country and region; what is allowable in one place may not be in another.

4.0

# HOW WE CONDUCT BUSINESS

Pharvaris operates in a highly-regulated environment. Conducting business in an ethical and respectful way is essential to our ability to help the patients we aim to serve.

## 4.1 Anti-Bribery and Anti-Corruption

Anti-bribery and anti-corruption laws and regulations make it illegal to offer, pay, ask for, or receive anything of value in return for inappropriate advantages. This extends to third-parties Pharvaris has engaged to support its business worldwide.

Company Personnel are expressly prohibited from participating in any form of illegal bribery or money laundering. Company Personnel shall not offer, promise, give or accept any item with economic value (including financial and non-financial advantages, promotional premiums and discounts, gifts, travel, meals, entertainment, favors or services) to or from any individual outside Pharvaris, including in particular any government

official or any family member of a government official, with the intention of illegally influencing such individual such that the Company Personnel concerned may obtain or retain a personal opportunity or advantage or a business opportunity or advantage for Pharvaris.

When involved in exports, Company Personnel shall observe all laws, regulations and international trade agreements that govern the shipment of Pharvaris' products and services to the importing country and vice versa. Company Personnel should also be aware of, and abide by, the provisions of the Pharvaris' Anti-Corruption Policy.

If you are in doubt as to the propriety of any gift or offer, you should consult with your manager, a member of the LECO team, or Human Resources. Directors should consult with the Chief Legal Officer or their designee.

## 4.2 Antitrust and Unfair Competition

Antitrust laws and competition laws promote fair and honest competition. These laws often focus on ways to ensure that businesses compete on the basis of quality, price, and service. Pharvaris will not tolerate or participate in any business conduct, transaction or activity that violates the antitrust and competition laws of any country in which we do business.

To support fair and honest competition, Company Personnel:

- Shall not engage in discussions or make agreements with any actual or potential competitor about pricing policies, discounts, or other terms of sale, or splitting markets or customers;
- Shall refrain from discussing competitive issues relating to Pharvaris with external parties (including Pharvaris' strategies and the identity of its customers, suppliers and other business partners), except to the extent that such information is publicly available other than through improper disclosure;
- Shall not engage in discussions or make agreements with any actual or potential competitor about the sale (or non-sale) of either our products or theirs;
- Shall, when participating in joint ventures and industry associations involving competitors, limit communications to the minimum necessary;
- Shall not knowingly use market power or market information in a way that may restrict fair and honest competition;
- Shall not bribe or attempt to bribe customers or suppliers to help our business or hurt our competitors; and
- Shall exercise caution when engaging in conduct that could give the appearance of unfair competition or the abuse of a dominant position in the marketplace.

## 4.3 Conflicts of Interest & Corporate Opportunities

Company Personnel are expected to advance Pharvaris' legitimate business interests. Company Personnel shall not:

- enter into competition with Pharvaris;
- provide unjustified advantages to third parties to the detriment of Pharvaris; or
- take advantage of business opportunities available to Pharvaris for himself or for his spouse, registered partner or other life companion, foster child or any relative by blood or marriage up to the second degree.

A conflict of interest occurs when an individual's private interest actually interferes, or appears to interfere, with the interests of Pharvaris. A conflict of interest can arise when Company Personnel takes actions or has interests that may make it difficult to perform his or her work for Pharvaris objectively and effectively. Conflicts of interest also arise when Company Personnel (or a member of his or her family) receives improper personal benefits as a result of his or her position in Pharvaris.

Loans by Pharvaris to, or guarantees by Pharvaris of, obligations of directors, officers, employees or their family members are of special concern. Loans by Pharvaris to, or guarantees by Pharvaris of, obligations of any director or executive officer are expressly prohibited.

Whether or not a conflict of interest exists or will exist can be unclear. Conflicts of interest should be avoided unless specifically authorized as described below.

Persons other than directors and officers who have questions about a potential conflict of interest or who become aware of an actual or potential conflict should discuss the matter with, and seek a determination and prior authorization or approval from, their manager or the Chief Legal Officer. A manager may not authorize or approve conflict of interest matters or make

determinations as to whether a problematic conflict of interest exists without first providing the Chief Legal Officer with a written description of the activity and seeking the Chief Legal Officer's written approval. If the manager is themselves involved in the potential or actual conflict, the matter should instead be discussed directly with the Chief Legal Officer.

Directors and officers must seek determinations and prior authorizations or approvals of potential conflicts of interest to the Board of Directors per Article 7 of the Board Rules.

## 4.4 Government Officials

When dealing with the government or government officials in performing activities for Pharvaris, Company Personnel shall conduct themselves according to the highest business, ethical, moral and legal standards. Company Personnel should also be aware of, and abide by, the provisions of Pharvaris' Anti-Corruption Policy.

From time to time, issues of significant importance to the financial and business well-being of Pharvaris may arise in a political context. Pharvaris may participate in such political processes in order to advance its legitimate business interests, including through lobbying, publication of its views in the media and supporting interested organizations.

## 4.5 International Business Practices

Pharvaris:

- shall not expand its business into a new country without discussing it with the appropriate level of management and, if required, the LECO team;
- shall be particularly sensitive to dealings with countries that are involved in conflicts or subject to international sanctions; and

- shall consult with the LECO team when appropriate for specific guidelines for conducting international business.

Company Personnel shall apply Pharvaris' business, ethical, moral and legal standards when conducting business in any country.

## 4.6 Insider Trading

The applicable restrictions and prohibitions on market abuse, including concerning the unlawful use and disclosure of inside information, tipping and market manipulation, are specific and complex. Company Personnel should refer to Pharvaris' Insider Trading Policy, which contains detailed rules on the possession of, and conducting and effecting transactions in, the Company's shares and certain other financial instruments.

5.0

## ACCURATE RETENTION OF BUSINESS RECORDS

**Accurate information is essential to Pharvaris' ability to meet its legal and regulatory obligations.**

Consequently, all Company Personnel shall comply with Pharvaris' procedures for records management. Information shall be recorded completely, accurately, honestly and in a timely manner, and shall never falsify, alter, destroy or conceal any information in order to impair the integrity or availability thereof in an illegal manner.

Financial transactions carried out by Pharvaris shall be recorded properly, accurately and fairly, in the correct accounts and within the relevant accounting period, all with due observance of applicable laws, regulations and accounting policies.

Legal holds issued by the LECO team are an exception to the routine records management and retention practices of Pharvaris, and Company Personnel shall comply with Pharvaris' Legal Hold Policy. Failure to comply with a legal hold could expose both Pharvaris and individual Company Personnel to legal sanctions as well as disciplinary or corrective action. All questions regarding a legal hold should be directed to the Chief Legal Officer.

## PUBLIC REPORTING OBLIGATIONS

Pharvaris relies upon our accounting and other business and corporate records to produce reports for our management, shareholders and creditors, as well as in preparing the periodic, current and other reports we may file from time to time with the U.S. Securities and Exchange Commission (“SEC”) and other similar regulatory bodies (“Financial Reports”). Securities laws require that these Financial Reports provide full, fair, accurate, timely and understandable disclosure and give a true and fair view of our assets, liabilities and financial position so we can present our financial condition and results of operations.

All Pharvaris books, records and accounts shall be maintained in accordance with all applicable regulations and standards. Company Personnel who collect, provide or analyze information for, or otherwise contribute in any way, in preparing or verifying Financial Reports shall strive to ensure that our financial disclosure is accurate and transparent. In addition:

- Company Personnel shall not take or authorize any action that would intentionally cause Pharvaris financial records or financial disclosures to fail to comply with generally accepted accounting principles, the rules and regulations of the SEC and other regulatory bodies, or other applicable rules and regulations;
- Company Personnel must cooperate fully with Pharvaris’ finance department, as well as independent public accountants and counsel, respond to their questions with candor and provide them with complete and accurate information;
- Company Personnel shall not directly or indirectly take any action to coerce, manipulate, mislead or fraudulently influence any independent public or certified public accountant engaged in the performance of an audit or review of Pharvaris’ financial statements; and
- Company Personnel shall not knowingly make, or cause or encourage any other person to make, any false or misleading statement on any report filed with the SEC or other regulatory body or knowingly omit, or cause or encourage any other person to omit, any information necessary to make the disclosure in any of our reports accurate in all material respects.

Any Company Personnel who become aware of a departure from these standards should report promptly to their manager, a member of the LECO team, or the Audit Committee as described in the reporting channels in this Code. Any director who becomes aware of a departure from these standards should report promptly to the Chief Legal Officer or her designee.

## ADDITIONAL INFORMATION ABOUT **COMPLIANCE AT PHARVARIS**

Pharvaris' Compliance Program is overseen by the Legal and Compliance (LECO) function, which is driven by Pharvaris' commitment to conducting business with integrity and in compliance with all applicable laws.

The LECO team supports this by informing and educating Company Personnel and others who conduct business on our behalf about the requirements and our expectations. LECO also regularly monitors our Compliance Program to identify any existing compliance-related issues, to determine whether the program is operating as intended, and to identify potential improvements.

The major features of our Compliance Program include:

- Oversight by our Board of Directors
- A Chief Compliance Officer, who is responsible for making sure that the necessary elements of an effective compliance program are in place. The Chief Compliance Officer also reports to the Board of Directors on compliance matters.
- Written policies and supporting documentation such as this Code of Conduct and related policies.
- Communication of our Compliance Program requirements through our Code of Conduct, our internal and external websites, and other communication vehicles.
- Ongoing training and education of staff on our Compliance Program and its requirements.
- A Compliance Hotline, through which anyone, internal or external to Pharvaris, can report misconduct without fear of retaliation. Callers may remain anonymous unless they are from countries where anonymity is discouraged or not permitted by law.
- Routine monitoring of our compliance risks through normal processes embedded in our operations and audits that use a unified approach across our business activities. Results are reported to the Chief Compliance Officer.
- Timely and appropriate investigations into reported concerns about potential compliance violations.
- Appropriate responses to violations of our policies and steps to prevent recurrence.
- A risk-based approach to the design of our Compliance Program and program activities.

**PHARVARiS**

PHARVARIS.COM