



IMMUNIC, INC.
Complaint Procedures for Accounting and Auditing Matters

Adopted and approved April 12, 2019

Immunic, Inc. (“**IMMUNIC**”) is committed to maintaining high standards of financial integrity, and the Audit Committee of the **IMMUNIC** Board of Directors takes very seriously all complaints and concerns regarding accounting, internal accounting controls and auditing matters. **IMMUNIC**’s financial information guides the decisions of the Board of Directors and management and is relied upon by **IMMUNIC**’s stockholders, employees and business partners. **IMMUNIC**’s policies and practices have been developed to maintain the highest business, legal and ethical standards.

IMMUNIC strives to encourage open communication so that such concerns may be raised without fear of retaliation in any manner. It is **IMMUNIC**’s policy to encourage its employees to report those concerns as soon as possible after discovery.

Accordingly, the Audit Committee has established the following procedures for:

- The receipt, retention and treatment of complaints regarding accounting, internal accounting controls, or auditing matters; and
- The confidential, anonymous submission by **IMMUNIC** employees of concerns regarding accounting or auditing matters they believe to be questionable.

The Audit Committee is committed to continuously reviewing and updating its policies and procedures. **IMMUNIC** may modify this policy at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with state or federal regulations or the rules and regulations of any market or exchange on which **IMMUNIC**’s stock may trade in the future and/or to accommodate organizational changes.

Receipt of Complaints

1. Non-employees may submit complaints regarding accounting, internal accounting controls or auditing matters by mail to:

Accounting Concerns
c/o Chairman of Audit Committee of the Board of Directors Immunic, Inc.
Am Klopferspitz 19
82152 Planegg-Martinsried, Germany

2. Employees may submit concerns regarding accounting, internal accounting controls, or auditing matters they believe to be questionable (confidentially and anonymously, if they wish) in one of the following ways:

- Via electronic mail to the Audit Committee Chairman at whistleblower@immunic.de;

- To the Chairman of the Audit Committee via regular mail at the address set forth above; or
- To Dentons US LLP, the Company's outside counsel, via electronic mail to ilan.katz@dentons.com, or via telephone at 212-632-5556.

3. The methods of submitting complaints shall be published on Immunic's external and internal websites in such manner as the Chief Compliance Officer, in consultation with the Audit Committee, deems appropriate. It shall be emphasized to employees that each of the methods of submitting complaints listed above may be used anonymously and that such complaints shall be treated confidentially.

4. Except for complaints sent directly to the Audit Committee, all complaints will be forwarded to the Chief Compliance Officer for coordination of their treatment as set forth below.

Treatment of Complaints

1. All accounting and auditing complaints received shall be entered on an accounting and auditing matters log, which shall include, among other things, information regarding the date the complaint was received, a description of the complaint, the submitter (if provided), and the status and disposition of an investigation of the complaint. Receipt of the complaint will be acknowledged to the sender, within a reasonable period following receipt, if appropriate information for response is supplied.

2. Non-accounting or non-auditing complaints shall be logged separately and will be forwarded to the appropriate person or department for investigation, unless the Chief Compliance Officer determines that other treatment is necessary (e.g., such complaint involves a finance employee or executive officer). If employees feel that internal reporting of non-accounting or non-auditing matters would be inappropriate under the circumstances, employees should feel free to make reports directly to the Audit Committee according to the procedures specified above.

3. With respect to complaints not initially directed to the Audit Committee regarding accounting or auditing matters, the Chief Compliance Officer will report immediately to the Audit Committee matters he deems significant (e.g., allegations of fraud or allegations of accounting or auditing matters it believes to be questionable involving executive officers). The Audit Committee shall direct and oversee an investigation of such complaints, as well as any complaints initially directed to the Audit Committee, as it determines to be appropriate.

4. All other complaints regarding accounting or auditing matters shall be reviewed under the direction and oversight of the Chief Compliance Officer, who will involve such other parties (e.g., members of the finance department and, if no department exists, the Company's Chief Compliance Officer or outside advisors) as deemed appropriate. The Chief Compliance Officer shall provide the Audit Committee with a quarterly report of all accounting or auditing complaints received and an update of pending investigations. The Audit Committee may request special treatment for any complaint and may assume the direction and oversight of an investigation of any such complaint.

5. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

6. In all cases, prompt and appropriate corrective action shall be taken as determined by the Audit Committee. An employee may be subject to disciplinary action, which may include the

termination of his or her employment, if the employee fails to cooperate in an investigation or deliberately provides false or misleading information during an investigation. The specific action that will be taken in response to a report will depend on the nature and gravity of the conduct or circumstances reported and the quality of the information provided. Where questionable accounting, internal accounting controls or auditing matters or the reporting of fraudulent financial information is verified, corrective action will be taken and, if appropriate, the persons responsible will be disciplined.

7. Reprisal, threats, retribution or retaliation in any way against any person who has in good faith made a complaint or reported a concern, or against any person who assists in any investigation or process with respect to such a complaint or concern, is prohibited. Employees who believe that they have been subjected to any discrimination, retaliation or harassment for having submitted a complaint regarding questionable accounting, internal accounting controls or auditing matters, or the reporting of fraudulent financial information under this policy, or participating in an investigation relating to such a complaint, should immediately report the concern to either the Chief Compliance Officer or to any of their supervisors. Any complaint that such discrimination, retaliation or harassment has occurred will be promptly and thoroughly investigated. If such a complaint is substantiated, appropriate disciplinary action will be taken, up to and including termination.

Retention of Complaints

The Chief Compliance Officer shall retain written complaints, the accounting and auditing matters log and all related documentation as required under applicable law.

Please sign the acknowledgment form below and return it to the Chief Compliance Officer.

**Acknowledgment and Agreement Regarding IMMUNIC, INC.
Complaint Procedures for Accounting and Auditing Matters**

I acknowledge that I have received a copy of the Immunic, Inc. (“IMMUNIC”) Complaint Procedures for Accounting and Auditing Matters and understand that it is IMMUNIC’s policy that there be no discrimination or harassment against any employee on the basis of:

- Reporting of questionable accounting, internal accounting controls or auditing matters; or
- Disclosure of related information to a Federal regulatory or law enforcement agency, any Member of Congress or of a committee of Congress, or to any person conducting an investigation of financial or accounting concerns pertaining to IMMUNIC.

I also acknowledge that to the extent I have concerns that I reasonably believe to be related to questionable accounting, internal accounting controls or auditing matters, it is my responsibility to report these concerns under the policy. I understand that to the extent I do not use the procedures outlined in IMMUNIC’s Complaint Procedures for Accounting and Auditing Matters, IMMUNIC and its officers and directors may presume and rely on the fact that I have no knowledge of or concern regarding questionable accounting, internal accounting controls or auditing matters.

Employee’s Signature

Employee’s Signature

Date