

Adopted and approved by the company president: Dr. Daniel Vitt

## Table of Contents

	Page
<i>Welcome to Immunic Therapeutics!</i> .....	1
<i>Code of Business Conduct and Ethics</i> .....	2
<i>Compensation and Benefits Policy</i> .....	2
<i>Leave Policy</i> .....	2
<i>Use of Company Property</i> .....	3
<i>Equal Employment and Nondiscrimination Policy</i> .....	3
<i>Non-Disclosure of Confidential Information</i> .....	3
<i>Insider Trading</i> .....	3
<i>EQUAL EMPLOYMENT OPPORTUNITY COMMITMENT POLICY</i> .....	5
<i>DISABILITY ACCOMMODATION POLICY</i> .....	6
<i>POLICY AGAINST HARASSMENT</i> .....	7
<i>WORKPLACE ANTI-VIOLENCE POLICY</i> .....	10
<i>DRUG AND ALCOHOL POLICY</i> .....	11
<i>SMOKING POLICY</i> .....	13
<i>AT-WILL EMPLOYMENT POLICY</i> .....	14
<i>WORKPLACE PROFESSIONALISM AND BEHAVIOR POLICY</i> .....	15
<i>CONFLICTS OF INTEREST POLICY</i> .....	19
<i>TERMINATION POLICY</i> .....	23
<i>USAGE OF PHONE, COMPUTER, AND BULLETIN BOARD POLICY</i> .....	24
<i>DESK INSPECTION POLICY</i> .....	28

## ***Welcome to Immunic Therapeutics!***

Immunic Therapeutics is a clinical-stage biopharmaceutical company developing a pipeline of selective oral immunology therapies aimed at treating chronic inflammatory and autoimmune diseases.

Immunic, Inc. is headquartered in New York. Its subsidiary, Immunic AG, is based in Planegg-Martinsried, Germany, where the company's research and development activities are conducted. Additional subsidiaries are located in Halle (Saale), Germany, and Melbourne, Australia.

What is important to know when joining our team?

We value honest and trustworthy communication, integrity, proactivity and willingness to learn. These features are essential in an innovative, fast growing and constantly changing working environment, such as ours.

The Company and its employees have built up significant goodwill in the course of developing customer and investor relationships. This goodwill is one of our most important assets, and Company employees are expected to behave in a manner that preserves and enhances the Company's reputation.

We developed this manual to sum up organizational issues into a clear, consistent and manageable guidance. The first part of this manual sets forth an overview of Company policies and procedures, with additional detail set forth in the specific policies that follow. We expect our employees to follow stated policies and procedures in everyday work.

Immunic Therapeutics reserves the right to change, suspend or supplement this manual if necessary. Terms like "colleagues," "employees" or "contact persons" are used with respect to all female and male colleagues.

Welcome aboard, we are happy that you will support our team!

## ***Code of Business Conduct and Ethics***

Code of business conduct and ethics of our company seeks to ensure that our business practices conform to applicable laws, regulations and ethical business principles. The Code is intended to guide daily behavior and help employees to resolve the most common ethical and compliance issues that they may face. However, it is impossible to anticipate every situation that may arise. When in doubt, we encourage employees to seek advice and to speak up to disclose any situation that may violate laws or our internal policies and standards. If you have questions regarding the topics covered in our Code of Conduct, you may address them to:

- Your line manager
- Immunic CEO/President

The Code of Conduct applies to all employees, officers and directors of our company. Third party stakeholders whom we engage are also expected to adhere in the course of performing work on our behalf.

Immunic Therapeutics Code of business conduct and ethics is available on company website under <http://ir.immunic-therapeutics.com/documents-and-charters>

## ***Compensation and Benefits Policy***

The amount of compensation of each employee is provided in offer letter as well as in the contract of each employee. An employee receives monthly compensation with the statutory deduction being deducted.

In case of instructed business trips, the necessary expenses shall be reimbursed in accordance with the Travel and Expense Policy Guideline of the Company.

If the Company offers the employee to participate in an employee stock option plan or grants other gratuities, such shall constitute a voluntary benefit, which does not constitute a legal claim for the future. Details of any such claim may only arise within the framework of any separate agreement to be possibly entered into between the parties in this context.

## ***Leave Policy***

Details regarding the Leave, Sick and Vacation Policies are part of each employee's individual contract. Legal time off needs to be requested by email and approved by the line manager.

Moreover, the Company Leave, Sick and Vacation Policies are subject to laws and regulations of the country where an employee is based.

### ***Use of Company Property***

#### ***IT-Equipment***

On the first day with Immunic Therapeutics every employee gets introduced to his/her individual workplace. This includes the handover of Computer, Screen, local Back-up hard-disk and other devices. Access data as well as telephone number and other necessary information regarding our IT-system will also be provided on first day at our company.

#### ***Mobile Phones***

Mobile phones, as well as other office equipment (computer, screen, etc.) are the property of the company and should be used to carry out work related tasks.

### ***Equal Employment and Nondiscrimination Policy***

The diversity of the Company's employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. Examples include derogatory comments based on racial or ethnic characteristics and unwelcome sexual advances.

### ***Non-Disclosure of Confidential Information***

Employees and directors should maintain the confidentiality of information entrusted to them by the Company or its affiliates, customers, partners, distributors and suppliers, except when disclosure is specifically authorized by the President or required by law. Confidential information includes all non-public information that might be of use to competitors, or harmful to the Company or its affiliates, customers, partners, distributors and suppliers if disclosed. Any questions about whether information is confidential should be directed to the President.

### ***Insider Trading***

Employees need to be aware that insider trading is forbidden by law. Illegal insider trading refers generally to buying or selling a security, in breach of a fiduciary duty or other relationship of trust and confidence, on the basis of material, nonpublic information about the security. Insider trading violations may also include "tipping" such information, securities trading by the person "tipped," and securities trading by those who misappropriate such information.

Examples of insider trading cases that have been brought by the SEC are cases against: Corporate officers, directors, and employees who traded the corporation's securities after learning of significant, confidential corporate developments;

Friends, business associates, family members, and other "tippees" of such officers, directors, and employees, who traded the securities after receiving such information;

Other persons who misappropriated, and took advantage of confidential information from their employers, family, friends, and others.

Because insider trading undermines investor confidence in the fairness and integrity of the securities markets, the SEC has treated the detection and prosecution of insider trading violations as one of its enforcement priorities. Details are e.g. available through the SEC homepage: <https://www.investor.gov/additional-resources/general-resources/glossary/insider-trading>.

## ***EQUAL EMPLOYMENT OPPORTUNITY COMMITMENT POLICY***

### **Overview**

The intent of this policy is to establish the Equal Employment Opportunity philosophy of the Company.

### **Policy**

Immunic, Inc. is strongly committed to providing equal opportunity to all employees and applicants for employment. The Company does not discriminate on the basis of race, color, religion, national origin, ancestry, sex, gender, age, medical condition, sexual orientation, marital status, pregnancy, physical or mental disability, veteran status, citizenship, political activity or affiliation, medical condition (as defined under CA law), gender identity, gender expression, taking statutorily protected leave or any other protected status under applicable state or federal law, or on the basis of any perception that an applicant or employee has any of these characteristics or on the basis that an applicant or employee is associated with someone who has or is perceived to have these characteristics. The Company strictly prohibits the harassment of any individual on any basis listed above (see the Policy Against Harassment for further clarification).

This policy applies to all employment practices, including recruitment, advertising, job application procedures, hiring, firing, advancement, compensation, training, benefits, transfers, social and recreational programs and any other terms, conditions and privileges of employment.

An employee who believes that he or she has been subjected to any form of unlawful discrimination should make a complaint, preferably written, to Human Resources or his or her Manager. Complaints should be specific and should include the names of individuals involved and the names of any witnesses. The Company will promptly undertake an effective, thorough and objective investigation and attempt to resolve the situation. If the Company determines that unlawful discrimination has occurred, effective remedial action will be taken to deter any future discrimination.

Employees will not be retaliated against for bringing a complaint in good faith under the Equal Employment Opportunity Commitment Policy or the Policy Against Harassment or for honestly assisting in investigating such a complaint, even if the investigation produces insufficient evidence that there has been a violation, or if the charges cannot be proven. All employees and supervisors have a duty to cooperate in the investigation of any alleged complaint in violation of our EEOC Policy. As such, failing to cooperate or deliberately providing false information during an investigation shall be grounds for disciplinary action, including termination of employment.

## ***DISABILITY ACCOMMODATION POLICY***

### **Overview**

The intent of this policy is to help provide a workplace free from discrimination based on disability.

### **Policy**

The Company is committed to complying fully with state and federal disability discrimination laws. As previously stated, no program or activity administered by the employer shall exclude from participation, deny benefits to or subject to discrimination any individual based on an employee's actual or perceived disability or based on an employee's association with someone who has an actual or perceived disability.

The Company is further committed to providing reasonable accommodation to the known physical or mental limitations of an otherwise qualified applicant or employee. If you believe you are a qualified individual with a disability and that you need a reasonable accommodation in order to perform the essential functions of your job, please notify Human Resources. The accommodation process is interactive and allows the applicant or employee to identify possible accommodations. However, the Company has the right to choose among effective accommodations.

## **POLICY AGAINST HARASSMENT**

### Overview

The intent of this policy is to provide a safe comfortable work environment free of harassment.

### Policy

Immunic, Inc. is strongly committed to providing equal opportunity to all employees and applicants for employment. The Company does not discriminate on the basis of race, color, religion, national origin, ancestry, sex, gender, age, medical condition, sexual orientation, marital status, pregnancy, physical or mental disability, veteran status, citizenship, political activity or affiliation, medical condition (as defined under CA law), gender identity, gender expression, taking statutorily protected leave or any other protected status under applicable state or federal law, or on the basis of any perception that an applicant or employee has any of these characteristics or on the basis that an applicant or employee is associated with someone who has or is perceived to have these characteristics. All such harassment is prohibited by the Company and is against the law.

### Definition

Harassment is considered to be any behavior that does not relate to the ongoing business of the Company and that substantially prevents the employee from performing his or her duties, serves to threaten or intimidate an employee and/or produces a hostile work environment. When possible, employees should always tell a potential harasser that their behavior is unwanted or unwelcome and attempt to resolve any issues directly. If direct communication does not solve the problem, employees should immediately refer to Immunic, Inc.'s reporting and complaint procedures.

Prohibited unlawful harassment includes, but is not limited to, the following behavior:

- Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations or comments;
- Visual conduct such as derogatory and/or sexually-oriented posters, photography, cartoons, drawing or gestures;
- Physical conduct such as assault, unwanted touching, blocking normal movement or interfering with work because of sex, gender, race or any other protected basis;

- Threats, demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss, and offers of employment benefits in return for sexual favors.

There are two distinct categories of sexual harassment:

- Quid Pro Quo – When an individual’s submission to or rejection of unwelcome sexual conduct is used as a basis for employment decisions affecting that individual, including granting of employment benefits; and
- Hostile Environment – When unwelcome sexual conduct unreasonably interferes with an individual’s job performance or creates an intimidating, hostile, or offensive working environment, even if it does not lead to tangible or economic job consequences.

Sexual hares it includes harassment of women by men, of men by women, and same-sex harassment. Sexual harassment is unlawful whether it involves co-worker harassment, harassment by a supervisor or manager, or by persons doing business with or for the Company.

The Company prohibits any and all conduct that may reasonably be interpreted as harassment as defined above whether or not such conduct is pervasive enough or severe enough to meet the technical legal requirements of harassment. Further, sexually harassing conduct does not need to be motivated by sexual desire to be considered unlawful.

### Reporting and Complaint Procedure

An employee who believes that he or she has been subjected to any form of unlawful harassment that cannot be resolved directly should make a complaint, preferably written, to Human Resources or to his or her Manager. Complaints should be specific and should include the names of individuals involved and the names of any witnesses. The Company will take all complaints seriously, and will immediately undertake an effective, thorough and objective investigation and attempt to resolve the situation. All complaints shall be kept in confidence to the extent possible, except as is necessary to investigate the complaint and respond to any legal and/or administrative proceedings arising out of or relating to the complaint. If the Company determines that unlawful harassment has occurred, effective remedial action will be taken commensurate with the severity of the offense. Appropriate action will also be taken to deter any future unlawful harassment. All employees and supervisors have a duty to cooperate in the investigation of alleged harassment or discrimination. In addition, failing to cooperate or deliberately providing false information during an investigation shall be grounds for disciplinary action, including termination of employment.

## Retaliation

Employees will not be retaliated against for bringing a complaint in good faith under the Equal Employment Opportunity Policy or the Policy Against Harassment or for honestly assisting in investigating such a complaint, even if the investigation produces insufficient evidence that there has been a violation, or if the charges cannot be proven. Any report of retaliation by the one accused of harassment or discrimination, or by co-workers, supervisors, or managers, will also be promptly and thoroughly investigated in accordance with the Company's investigation procedures outlined above. If a complaint of retaliation is substantiated, appropriate disciplinary action, up to and including discharge, will be taken.

## Additional Enforcement Information

In addition to the Company's internal complaint procedure, employees should also be aware that the federal Equal Employment Opportunity Commission (EEOC) investigates and prosecutes complaints of harassment, discrimination, and retaliation in employment. Information about the EEOC complaint procedure can be found on their website ([www.eeoc.gov](http://www.eeoc.gov)). You may also contact the EEOC at: 1-800-669-4000 (English) or 1-800-669-6820 (TTY). Employees may also contact their applicable local or state agencies, whose contact information can be obtained from Human Resources.

This policy can be modified unilaterally by the Company at any time without notice. Modification may be necessary to maintain compliance with local, state, and federal laws and/or accommodate organizational changes within the Company.

## **WORKPLACE ANTI-VIOLENCE POLICY**

### Overview

This policy applies to all employees of Immunic, Inc. The intent of this policy is to provide a safe and comfortable work environment that is free from acts of violence or threats of violence.

### Policy

Immunic, Inc. is committed to providing a workplace that is free from acts of violence or threats of violence. A threat is any word or action that creates a perception that there is or may be an intent to harm a person, a group and/or property. In keeping with this commitment, the Company has established a strict policy that prohibits any employee from threatening or committing any act of violence in the workplace, while on duty, while on Company-related business, or while operating any vehicle or equipment owned or leased by the Company. This policy applies to all employees.

In order to achieve our goal of providing a workplace that is secure and free from violence, the Company must enlist each employee's support. Compliance with this policy and the Company's commitment to a zero-tolerance policy with respect to workplace violence is every employee's responsibility. A violation of the policy's terms, by engaging in or contributing to violent behavior or by threatening others with violence will lead to disciplinary action, up to and including immediate termination.

Employees should immediately inform their Manager about any workplace security hazards. If a Manager is not readily available, employees should immediately inform Human Resources so that appropriate action can be taken.

There will be no retaliation against employees for bringing a complaint in good faith under the Workplace Anti-Violence Policy or for honestly assisting in investigating such a complaint, even if the investigation produces insufficient evidence that there has been a violation, or if the charges cannot be proven.

## **DRUG AND ALCOHOL POLICY**

### Overview

The intent of this policy is to provide a drug and alcohol free work environment for all Immunic, Inc.'s employees. This policy applies to all employees, as well as any visitors, vendors, contractors, consultants and other non-employees who are conducting business on Company premises.

### Policy

Because all employees deserve to work in a safe, efficient and productive environment, all employees must work free from the effects of drugs and alcohol.

“Drugs” refers to any drug, including prescribed medication, which is not legally obtained or prescribed to the employee, which impairs the employee’s ability to perform normal activities and job performance. Using prescribed drugs for other than prescribed purposes is also not acceptable.

Immunic, Inc. strictly prohibits using, being under the influence of, possessing, distributing, selling or buying any illegal drugs and/or substances on Company property or time, including break or meal periods. The possession or use of drug paraphernalia is also prohibited on Company property or time, including break or meal periods.

The unauthorized use, possession, distribution, purchase or sale of alcohol by any person while on Company premises or on Company paid time is prohibited. Any use of alcohol, which impairs job performance, is also prohibited. Any person under the influence of alcohol is prohibited from entering Immunic’s premises or engaging in Company business.

Moderate use of alcohol is permitted at Company-sponsored business or social functions. Any employee who is legally under the influence as a result of consuming alcohol at a Company business meeting or social function is prohibited from driving and is responsible for obtaining safe, alternate transportation. The Company will arrange for other forms of transportation at the request of an employee or if it is determined that such assistance is in the best interest of itself and the employee.

Each employee is accountable for the performance of his or her job duties and personal conduct at all times. Employees are expected to conduct themselves in an appropriate and professional manner while on Company business and at all Company functions both onsite and offsite. In addition, employees should refrain from any behavior that violates Company policies at all times.

Immunic complies with all applicable state and federal legal guidelines regarding alcohol consumption and age requirements.

Employees should be cautioned when using prescribed medications in the workplace that the medication does not impact their ability to perform their job functions. If the employee is prescribed medication that may impact the employee's ability to work or perform their job duties, the employee should make arrangements to take time off of work while under the influence of that medication. Employees should be aware that if a problem with their job performance or behavior exists, the Company will address those performance issues with the employee. The Company considers failure to comply with these guidelines to be a serious matter. It may result in disciplinary action, up to and including termination.

Employees are encouraged to inform their manager or the human resources department if they wish to participate in a substance abuse program so reasonable accommodations can be made. Privacy will be maintained to the extent possible and PTO time may be used for this purpose.

## ***SMOKING POLICY***

In keeping with Immunic's intent to provide a safe and healthful work environment, tobacco use is prohibited in Immunic facilities and is discouraged for all employees. Smoking is only allowed outside the facility, and away from open doors and windows. Smoking should be done during breaks and meal periods, and not during work time. Employees who take excessive breaks for tobacco use and smoking will be counseled and subject to disciplinary action, up to and including termination. In situations where the preferences of smokers and nonsmokers are in direct conflict, the preference of the nonsmokers will prevail. This policy applies equally to all employees, consultants and visitors.

## **AT-WILL EMPLOYMENT POLICY**

### Overview

This policy applies to all employees of Immunic, Inc. The intent of this policy is to define the employment relationship.

### Policy

The employment relationship between Immunic, Inc. and its employees is for an unspecified term and may be terminated by the employee or Immunic at any time, with or without cause or advance notice. Also Immunic reserves the right to transfer, demote, suspend and administer discipline with or without cause or advance notice.

None of the policies, procedures or contents of this manual is intended to create any contractual obligations which in any way conflict with the Company's policy of at-will employment. The at-will employment relationship can only be modified by a written agreement signed by the employee and the President/CEO of Immunic.

## **WORKPLACE PROFESSIONALISM AND BEHAVIOR POLICY**

### Overview

The intent of this policy is to clarify Immunic's standards of professionalism and behavior to ensure orderly business practices and make working conditions more pleasant for everyone.

### Policy

As an Immunic employee, it is expected that you will adhere to all Company policies and practices. It is further expected that you will conduct yourself in a professional manner at all times, and exhibit the highest level of integrity in performing your job. It is equally important to maintain a positive work environment through good working relationships with our customers, visitors, and your co-workers, that emphasize our commitment to good customer service. Any violation of these standards of conduct, or other employment policies, or any inappropriate conduct whatsoever may result in immediate discipline up to and including termination.

The list below is not intended to be all-inclusive, but merely illustrates the various types of prohibited conduct. Policies governing our Standards of Professionalism and Behavior are listed below and may be subject to change or modification at Immunic's sole discretion.

### Illustrations of Types of Prohibited Conduct and Behavior

#### Attendance Issues:

- Improper authorization, use or abuse of paid or unpaid leave. Using an approved leave-of-absence for purposes other than for which it was intended or working for another employer, without permission, while on an approved leave-of-absence.
- Excessive absenteeism.
- Being absent without authorization, or repeated unauthorized late arrival or early departure from work.
- Failure to timely return to work from scheduled breaks.
- Performing overtime work without authorization.
- Failure to notify the manager of impending tardiness or absenteeism.
- Failing to work assigned hours including overtime.
- Failing to fill out timecards timely and accurately or falsification of information on the timecard.

- Failing to report to work on the first day following the expiration of a leave of absence.
- Failing to report to work without notifying Immunic.
- Swapping work hours or days without permission.

#### Behavior Issues

- Failure to carry out a direct request from a superior, except where the employee or another person's safety may be jeopardized.
- Engaging in a conflict of interest activity.
- Conviction of a crime, including convictions based on a plea of nolo contendere or of a misdemeanor involving moral turpitude.
- Violence, use of force, with or without weapons.
- Knowingly falsifying, removing, or destroying information related to employment, payroll, or work-related records or reports.
- Soliciting outside work for personal gain during business hours or participating in any off-duty employment that adversely affects the employee's performance of work for Immunic.
- Discourteous treatment of the public or other employees, including, but not limited to, harassing, coercing, threatening, or intimidating others.
- Violation or neglect of safety rules, or failing to report a hazardous condition to a manager.
- Violation of the Equal Employment Opportunity policy or the policy against discrimination, harassment and retaliation included in this Handbook.
- Carrying on any outside activities during working time or during any time, which would interfere with the work of other employees.
- Eating in laboratory or clean room environments.
- Failing to maintain personal appearance standards.
- Falsifying Company records or furnishing false or misleading information or withholding any information on Company records or pursuant to any investigation by

Immunic or any government agency. Failure to cooperate in an investigation involving any employee's compliance with employment policies and procedures.

- Theft, misappropriation, defacing or damaging of Immunic or another's property including cash or merchandise.
- Possession of a firearm or other weapon, loaded or unloaded, on Company property.
- Using, possessing or selling alcohol or drugs on Company property or during working time.
- Having alcohol in your system while on duty.
- Tape recording any conversations of co-workers or managers without express permission of all parties to the conversation.
- Unprofessional behavior in the workplace, such as sexually related conversations, inappropriate touching (i.e., kissing, hugging, massaging, sitting on laps) of another employee, and any other behavior of a sexual nature.

#### Performance Issues

- Inefficiency, incompetence, or negligence in the performance of duties, including failure to perform assigned tasks or training, or failure to discharge duties in a prompt, competent and reasonable manner.
- Refusal or inability to improve job performance in accordance with written or verbal direction after a reasonable trial period.
- Reporting to work or being under the influence of alcohol or drugs while on duty or on Company property. Using, possessing or selling alcohol or controlled substances on Company property or during working time.
- Suspension of driver's license or lack of insurability where job duties require driving.
- Careless, negligent, or improper use of Company property, equipment or funds, including unauthorized removal, or use for private purposes, or use involving damage or unreasonable risk of damage to property.
- Unauthorized release or possession of confidential information or business records.
- Sleeping on the job.

- Violating any employment policy or procedure, whether contained in this Handbook or not.

### Fraud Dishonesty and False Statements

No employee or applicant may ever falsify any application, medical history record, invoice, paperwork, time sheet, time card, investigative questionnaires or any other document. Any employee found to have engaged in resume fraud or who made material misrepresentations or omissions on their employment application will be subject to immediate termination of employment. If you observe any such violations, please report them to the proper members of management.

### Confidentiality

As a condition of employment, each employee must execute an Employee Innovations and Proprietary Rights Assignment Agreement prior to beginning employment with the Company. Each employee is responsible for safeguarding confidential information obtained in connection with his or her employment. In the course of your work, you may have access to confidential information regarding the Company, its suppliers, its customers, or perhaps even fellow employees. It is your responsibility to in no way reveal or divulge any such information unless it is necessary for you to do so in the performance of your duties. Access to confidential information should be on a “need-to-know” basis and must be authorized by your manager. Your obligations to maintain the confidentiality of this information will continue after your employment with the Company terminates. Any breach of this policy will not be tolerated and legal action may be taken by the Company. All telephone calls, letters, or other requests for information about current or former employees should be immediately directed to Human Resources.

## **CONFLICTS OF INTEREST POLICY**

### **Overview**

This policy is intended to provide guidelines in regard to conflicts of interest. This policy only establishes the framework within which Immunic, Inc. wishes the business to operate and does not include every possible variation which could be defined as a conflict of interest. Immunic's policies with regard to Code of Conduct and Anti-Corruption should be viewed first as the highest priority and direction, and the intent of this policy is to capture any other scenarios that may also provide a conflict of interest. Should any question of conflict of interest arise, an employee's Manager or any other appropriate Manager must be informed of the facts of the situation in order to make a determination.

### **Policy**

A conflict of interest can arise under many circumstances and generally occurs when any interest or activity outside of the Company is allowed to influence your judgment when acting on behalf of the Company or diminish efficiency and effectiveness in performing your regular duties. A conflict can also occur when an employee competes against the Company in any business activity, diverts business from the Company, or misuses the resources of the Company.

It is the employee's duty to disclose promptly any circumstances that might constitute a conflict of interest. If you suspect a conflict of interest exists, contact your immediate supervisor and/or the HR Department so that the matter can be resolved promptly. All employees who have or obtain a financial employment relationship with a competitor, customer, or supplier and all employees who are uncertain whether a certain relationship constitutes a conflict of interest must disclose this fact in writing to the HR Department.

### **Outside Business Activities**

Employees are expected to avoid any investment or ownership, directly or indirectly, of a substantial interest in a customer, subcontractor, supplier, or other service firm which is or might be doing business with or in competition with the Company, or with a present or prospective Company customer. A "substantial interest" is one which will or might be significant or of relevance to any Company transaction or its results, or can at any time be so perceived. Since in a particular case the determination of whether an ownership is "substantial" depends upon all circumstances and will most likely be determined retrospectively, full disclosure and advance request for interpretation as provided under the "implementation" provisions of this policy is strongly encouraged in all cases. Such disclosure will in almost all cases eliminate any actual or potential conflict of interest or policy deviation.

### Outside Business Employment

Serving as an officer, director, employee, committee member, agent, or representative to or consultant of any company, firm, or business other than the Company when such service conflicts with the Company's interests, Immunic customer's interests or detracts from or infringes in a significant way on the employee's time or responsibilities with the Company must never be undertaken.

Employees may hold other types of outside employment that are deemed not to conflict with Immunic's interests or provide a conflict of interest with a customer of Immunic (i.e., working for a direct competitor of either Immunic or a customer). However, the Company will make no exceptions to its high standards of performance or its scheduling needs to accommodate outside employment. To ensure there is no conflict of interest with the company or its customers, advance written approval is required by executive management, HR or the CEO, prior to accepting secondary employment with another company.

### Self-Dealing

Employees are expected to avoid directly or indirectly owning, trading, or dealing in real estate, materials, supplies, equipment, or other property with the intent of selling or renting to the Company or its customers. Employees should not transact any business other than the Company's business on the Company's time or property.

### Misappropriation of Goods

Equipment, tools, material, and supplies purchased are for Company business purposes only. Using or diverting the Company's know-how, internal information, equipment, tools, materials, supplies, or the time and services of its personnel for any purpose not compatible with the Company's best interests.

### Employee's Family

A member of an employee's immediate family involved in any of the above transactions or serving in any of the above capacities may also create a situation of conflict. Employees should be sensitive to such potential conflicts with their immediate family so as to avoid compromising the interests of the Company.

### Gifts/Entertainment

The selection of services or goods should be based solely upon price, quality, service, and need. Thus, employees involved in the selection and/or purchase of goods and services from vendors

and suppliers should avoid situations that could interfere, or appear to interfere, with their ability to make free and independent decisions regarding purchases on behalf of the Company.

In order to be free from any inference or perception that favorable treatment was sought, received, or given, an employee should not seek or accept from, nor shall the employee offer to, whether directly or indirectly, a customer, contractor, subcontractor, supplier, or service business (or its representative or agent) who is doing or might be doing business with the Company or a Company customer the following:

- Any commission, fee, or compensation of any kind;
- Any loan, advance, benefit, or service which in any manner depends upon or is associated with Company relationships, or deviates from the ordinary course of normal personal relationships on terms generally prevailing for such relationships; or
- Any gift or entertainment of value beyond common courtesies that may imply an obligation to the donor or may be considered excessive, in poor taste, or improper.

If you are offered or receive any substantial gift or favor, please notify your immediate supervisor and/or the HR Department. This Policy does not apply to items of small value commonly exchanged in business relationships, such as expenditures of reasonable amounts for meals or entertainment, but even in this case, discretion and common sense should be your guide.

There are some cases where refusal of an inappropriate gift would cause embarrassment and hurt to the person offering it. This is particularly true when you are a guest in another country. In these cases, the best practice is usually to accept the gift on behalf of the corporation, report it to your immediate supervisor and/or Human Resources, and turn it over to the corporation. In geographic areas where gifts are customary business exchanges, the executive in charge of your department is responsible for limiting such practice and for ensuring that any gifts are limited in value, held at the level of common courtesies, and free of any implication of obligation from the recipient. No gifts considered excessive, in poor taste, or improper will be given nor accepted.

### [Relationships between Employees](#)

Conflicts of interest may arise in situations where personal relationships between employees may present an appearance of favoritism, inappropriate behavior or lack of objectivity. Where two employees are related by family or become involved in an intimate, dating or marital relationship that may trigger these concerns, the Company shall take steps to eliminate the conflict. The relationship which may raise these concerns should be reported to the Human Resource Department by the parties involved as soon as the relationship has developed beyond normal business status. Conflicts of interest related to relationships between employees must

be resolved within 30 days of the start of the relationship or conflict of interest. Such steps to resolve the matter may involve transfer or reassignment so that the employees involved do not share any type of reporting relationship. If a transfer or reassignment is not possible or appropriate, then the matter will be resolved on a case by case basis to ensure that there is no direct reporting relationship or potential conflict. Potential resolutions beyond transfer or reassignment may include requesting the resignation of one or both parties, or the company decision to terminate the employment of one or both parties based on our “at will” employment.

## **TERMINATION POLICY**

### Overview

The intent of this policy is to explain the types of separation from the Company and Immunic's procedures for processing terminations.

### Policy

Termination of employment is an inevitable part of personnel activity within any organization. Because employment with Immunic, Inc. is based on mutual consent and at will employment, both the employee and Immunic have the right to terminate employment at will, with or without cause, at any time.

### Voluntary Resignation

An employee who voluntarily resigns his/her employment is asked to prepare a written letter of resignation informing Immunic of the intended resignation date. An employee is also considered to have voluntarily terminated employment by failing to report to work for three consecutive scheduled workdays without notice, or without prior approval by their Manager.

### Discharge or termination

Violation of the policies and procedures of Immunic, Inc., poor attendance or unsatisfactory job performance may result in disciplinary action up to and including termination. While Immunic may use progressive discipline including but not limited to verbal and written warnings, suspension, probationary periods and termination of employment, Immunic reserves the right to utilize any form of disciplinary action up to and including immediate termination at any stage it deems appropriate, depending on the circumstances. Any verbal or written warning offered is done as a courtesy to the employee, and at no time will the decision or attempt to warn an employee of performance concerns or policy violations change or alter the at will status of employee in any way.

Employees will receive their final pay in accordance with applicable state law. Employee benefits will be affected by employment termination in the following manner: all accrued, vested benefits that are due and payable at termination (including accrued but unused PTO) will be paid in accordance with applicable state law.

Some benefits may be continued at the employee's expense if the employee so chooses. The employee will be notified in writing of the benefits that may be continued and of the terms, conditions and limitations of such continuance.

## **USAGE OF PHONE, COMPUTER, AND BULLETIN BOARD POLICY**

### Overview

The intent of this policy is to assist in the understanding of the usage of email, voicemail, the internet, intranet, bulletin boards, computer files, and software.

### Policy

To further its business operations, Immunic maintains and makes available to its employees a computer system, consisting of computers and a network with servers, including the use of email, intranet and the internet, as well as a phone system, including the use of voicemail. All computers and all data stored on the computers, including without limitation email messages, as well as all phones and all data stored on the phones, including without limitation voicemail messages, are the property of Immunic.

Immunic, at any time, at its sole discretion, may retrieve, review, read, copy, disclose and use any data in the computer system, including any email, intranet or internet messages, and any data in the phone system, including any voicemail message or any internet or intranet information sent to or among others through the computer or phone systems. Although Immunic allows employees and consultants to use unique passwords on their computer and phone provided by Immunic, and permits employees and consultants to use these devices for personal activities, at no time should this ever be construed to mean that there is any privacy or confidentiality derived from having this password in place on any equipment, website or device that is owned by or paid for by the Company

Immunic, Inc. strives to maintain a workplace free of harassment and sensitive to the diversity of its employees. Therefore, Immunic prohibits the use of computers and the email system in ways that are disruptive, offensive to others, or harmful to morale.

For example, the display or transmission of sexually explicit images, messages, and cartoons is not allowed. Other such misuses include, but are not limited to, ethnic slurs, racial comments, off-color jokes, or anything that may be construed as harassment or showing disrespect for others.

**Internet Use:** Individual Internet use will not interfere with others' productive use of Internet resources. Users will not violate the network policies of any network accessed through their account. Internet use at Immunic, Inc. will comply with all Federal and applicable state laws, all Immunic, Inc. policies, and all Immunic, Inc. contracts. This includes, but is not limited to, the following:

1. The Internet may not be used for illegal or unlawful purposes, including, but not limited to, copyright infringement, obscenity, libel, slander, fraud, defamation, plagiarism, harassment, intimidation, forgery, impersonation, illegal gambling, soliciting for illegal pyramid schemes, and computer tampering (e.g. spreading computer viruses).
2. Individuals should limit their personal use of the Internet. Immunic, Inc. allows limited personal use for communication with family and friends, independent learning, and public service. Immunic, Inc. prohibits use for mass unsolicited mailings, access for non-employees to Immunic, Inc. resources or network facilities, uploading and downloading of files for personal use, access to pornographic sites, gaming, competitive commercial activity unless pre-approved by Immunic, Inc., and the dissemination of chain letters. Employees must remember that personal information stored on company provided computers and phones may inadvertently be inspected if the company needs to search for company information.
3. Individuals may not establish company computers as participants in any peer-to-peer network, unless approved by management.
4. Individuals may not view, copy, alter, or destroy data, software, documentation, or data communications belonging to Immunic, Inc. or another individual without authorized permission.
5. In the interest of maintaining network performance, users should not send unreasonably large electronic mail attachments or video files not needed for business purposes.
6. Individuals will only use Immunic, Inc.-approved services, specifically Microsoft Teams, for voice or video communication over the Internet.

**Monitoring and Filtering:** Immunic, Inc. may monitor any Internet activity occurring on Immunic, Inc. equipment or accounts. Immunic, Inc. currently employs filtering software to limit access to sites on the Internet. If Immunic, Inc. discovers activities which do not comply with applicable law or departmental policy, records retrieved may be used to document the wrongful content in accordance with due process.

**Security:** For security purposes, users may not share account or password information with another person. Internet accounts are to be used only by the assigned user of the account for authorized purposes. Attempting to obtain another user's account password is strictly prohibited. A user must contact the help desk or IT administrator to obtain a password reset if

they have reason to believe that any unauthorized person has learned their password. Users must take all necessary precautions to prevent unauthorized access to Internet services.

**E-mail:** Email may not be used to solicit others for commercial ventures, religious or political causes, outside organizations, or other non-business matters.

**Computer Software:** Immunic purchases and licenses the use of various computer software for business purposes and does not own the copyright to this software or its related documentation. Unless authorized by the software developer, Immunic does not have the right to reproduce such software for use on more than one computer.

Employees may only use software on local area networks or on multiple machines according to the software license agreement. Immunic prohibits the illegal duplication of software and its related documentation.

Employees should notify their immediate Manager, the President/CEO or any member of management upon learning of violations of this policy. Employees who violate this policy will be subject to disciplinary action, up to and including termination of employment.

**Social Media Use:** Immunic understands that employees may from time to time utilize various websites and social media sites online for personal reasons. Under no circumstances is any employee to utilize any website, including social media, to disparage the company, reveal any confidential information, or otherwise violate the employees' legal and contractual obligations to the Company. Further, employees must not represent themselves as speaking on behalf of the company on social media unless they have written authorization to do so. Employees who violate this policy will be subject to disciplinary action, up to and including termination of employment.

**Company Intranet:** Immunic maintains a company intranet as an important source of information. The intranet is to be used solely to post information approved by Immunic regarding Company policies, documents, resources, and other matters of concern to all employees and related to the employees' employment by Immunic. Please develop a habit of checking the intranet on a daily basis so that you will be familiar with the information posted there. No information may be placed on the intranet without the approval of the Human Resources Department.

**Bulletin Boards:** Immunic may maintain bulletin boards as an important source of information. This bulletin boards are to be used solely to post information approved by Immunic regarding Company policies, governmental regulations, and other matters of concern to all employees and related to the employees' employment by Immunic. Please develop a habit of checking the bulletin boards so that you will be familiar with the information posted there. No

information may be placed on these bulletin boards without the approval of the Human Resources Department.

***Cell Phone Usage and Texting:*** The Company is committed to keeping its employees safe at all times while on Company business. Employees are required to comply with all state and local laws regarding the use of wireless phones while driving, including applicable laws prohibiting text messaging while driving. All employees must use a hands-free device while driving. Whenever possible, employees should not make or receive telephone calls while driving, and employees should not send work-related email messages or text messages while driving. Under no circumstances should employees use wireless phones during adverse weather or difficult traffic conditions. Under no circumstances is an employee required to answer the phone to conduct Company business while driving. Any employee who violates this policy will be considered to be operating outside the course and scope of their employment. The Company takes its phone and device use policy seriously. Any violations of this policy will subject employees to disciplinary action, up to and including termination of employment.

## **DESK INSPECTION POLICY**

### Overview

The intent of this policy is to assist in the understanding of the use of workplace inspections.

### Policy

Although desks, cabinets and shelves are made available for the convenience of employees while at work, employees should remember that all desks, cabinets and shelves remain the sole property of the Company. Moreover, Immunic reserves the right to open and inspect desks, cabinets, and shelves, as well as any contents, effects, or articles in desks, cabinets, and shelves. Such an inspection can occur at any time, with or without advance notice or consent. An inspection may be conducted before, during, or after working hours by a Manager or security personnel designated by Immunic. Consequently, employees should not use Immunic property, including space, furniture, computers or equipment to receive, create or keep material or information that they want to keep private. If any company property, room or office used by employees has the ability to be locked, at no time should the employee ever believe that there is any confidentiality or privacy or perceived confidentiality or privacy from locking Immunic's property. Immunic must have keys and access to its property at all times.

Prohibited materials, including weapons, explosives, illegal drugs or illegally obtained medications, may not be placed in a desk, cabinet or shelf. Employees, who, if requested, fail to cooperate in any inspection, will be subject to disciplinary action, up to and including termination. Immunic is not responsible for any articles that are placed or left in a desk, cabinet, or shelf that are lost, damaged, stolen or destroyed.