

## **AURO VACCINES LLC**

### **CONFLICT OF INTEREST POLICY**

#### **Policy Statement**

It is the policy of Auro Vaccines LLC ("Auro Vaccines") that employees and others acting on Auro Vaccines' behalf must be free from conflicts of interest that could adversely influence their judgment, objectivity or loyalty to the company in conducting business activities and assignments. The company recognizes that employees may take part in legitimate financial, business, charitable and other activities outside their Auro Vaccines jobs, but any potential conflict of interest raised by those activities must be disclosed promptly to senior management.

#### **Scope**

This policy covers any person employed, contracted or consulting with Auro Vaccines, including its parent company Aurobindo Pharma USA, Inc., and all affiliates and subsidiaries thereof.

#### **What it means**

- One must request management approval of outside activities, financial interests or relationships that may pose a real or potential conflict of interest. Remember that management approval is subject to ongoing review, so you need to periodically update your management on your involvement.
- Avoid personal relationships with other Auro Vaccines employees where parties in the relationship may receive or give unfair advantage or preferential treatment because of the relationship.
- Avoid actions or relationships that might conflict or appear to conflict with your job responsibilities or the interests of Auro Vaccines.
- Even the appearance of a conflict of interest can damage an important company interest.
- Obtain necessary approvals before accepting any position as an officer or director or partner of an outside business concern.

#### **What to avoid**

- Working with any business, outside your Auro Vaccines responsibilities, that is in competition with any Auro Vaccines business.
- Accepting a gift that does not meet with the ethics, morals and standards of Auro Vaccines.
- Having a direct or indirect financial interest in or a financial relationship with an Auro Vaccines competitor, supplier or customer (except for insignificant stock interests in publicly-held companies).
- Taking part in any Auro Vaccines business decision involving a company that employs your spouse, family member or friend/acquaintance.
- Having a second job where your other employer is a direct or indirect competitor, distributor, supplier or customer of Auro Vaccines.
- Having a second job or consulting relationship that affects your ability to satisfactorily perform your Auro Vaccines assignments.
- Using any Auro Vaccines information for your personal gain or advantage, or for the gain or advantage of another, including the purchase or sale of securities in a business Auro

Vaccines is interested in acquiring, selling or otherwise establishing or terminating business relations with.

- Investing in an outside business opportunity in which Auro Vaccines has an interest, except for having an insignificant stock interest in publicly-held companies.
- Receiving personal discounts or other benefits from suppliers, service providers or customers that are not available to all Auro Vaccines employees.
- Receiving personal honoraria for services you perform that are closely related to your work at Auro Vaccines. Your supervisor should approve occasional honoraria, such as for a university presentation or symposium.
- Having romantic relationships with certain other employees where: There is an immediate reporting relationship between the employees. There is no direct reporting relationship between the employees but where a romantic relationship could cause others to lose confidence in the judgment or objectivity of either employee, or the relationship could cause embarrassment to the company.