



innate pharma

Code of Ethics

Main purpose

This Code of Ethics sets out basic principles to guide all permanent and occasional employees of Innate Pharma (the “Company”). All of its employees must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. The Company requires its employees to behave honestly in their management and commercial activities as well as in their stakeholder relationships (contractors, partners, patients, etc.).

This code should also be given to and complied with by the Company's third-party partners and representatives, or acting on behalf of the Company. The Code of Ethics is made available on the Company's website (www.innate-pharma.fr).

This Code of Ethics does not have a comprehensive nature, but it lays down forms of good behavior as well as the basic principles of individual and collective responsibility. It is intended to be observed in addition to applicable laws and regulations, not to replace them. Details of these basic principles are given in the Company's Rules of Procedure, and more specifically in its Code of Conduct for Securities Trading, in its Quality Charter and in other Company documentation. This Code of Ethics does not cover every issue that might arise. When there is uncertainty about the appropriate behavior to adopt, employees are invited to seek advice from their supervisors and should always act with good sense and honesty.

This Code of Ethics is intended to be updated.

Basic principles of ethics

Innate Pharma encourages its employees to work in a professional, cooperative and responsible spirit.

1. COMPLIANCE WITH LAWS, RULES AND REGULATIONS

The Company and its employees are committed to complying with applicable laws, rules and regulations in the country where they carry out their activities.

The Code of Ethics is intended to be observed in addition to applicable laws and regulations, not to replace them.

2. WORKING ENVIRONMENT

2.1. Corporate behavior

The Company is committed to treating all employees with respect and impartiality and to providing them, to the greatest extent practicable, with opportunities to advance within the Company.

It is also the Company's responsibility to create and maintain a favorable workplace environment for quality work and to be attentive to employees' comments.

The Company will not tolerate intimidation, harassment or discrimination on the basis of national origin, color, gender, religion, marital status, citizenship status, sexual orientation, age, ancestry, disability or on any other unlawful basis. The Company is committed to respecting each individual and their privacy.

The Company respects commitments by its employees who, as citizens, participate in public life, but intends to maintain a politically neutral attitude. None of the Company's assets may be used for political activities and all employees should abstain from making moral commitments in the Company's name.

2.2. Staff representatives and consultative management

The Company respects the freedom to join or create sociocultural, sport, trade union or other associations. The Company's staff is represented by freely elected employee delegates. Union Delegates and members of the Works Council actively take part in Company life and discuss with the management on a regular basis. They are advised of strategic decisions. They regularly report the subjects discussed to other staff members with full transparency. They are present or represented at Supervisory Board meetings and at certain internal steering committees.

The Company promotes participative management based on responsibility and dialogue. Decisions must be guided by the Company's interest and a rational analysis of available data, as well as an assessment of the risks incurred. Regular meetings are organized with the staff in order to inform employees of the Company's situation and strategic decisions.

2.3. Health and safety

Employee health and safety are priorities for the Company. It implements all necessary means to prevent accidents, incidents and occupational illnesses. The Health and Safety committee, composed by members assigned by the Works Council, promotes preventive and learning actions related to health and safety rules.

Employees are responsible for their own safety in their positions and must comply with the rules applicable to their workstations.

2.4.Environmental behavior

The Company complies with all applicable environmental laws, including those governing the control, transport, storage and disposal of waste or the use and handling of regulated materials. The Company encourages its employees to adopt responsible behaviors toward the environment by avoiding energy and material waste, and by promoting materials recycling. All employees should reduce waste related to their activities as much as possible. Reducing energy consumption and avoiding pollution are the Company's concerns; it is committed to applying all environmental regulations alongside its employees.

3. SCIENTIFIC AND MEDICAL ETHICS

3.1.Scientific ethics

The Company's core business is based on its scientific skills and on its ability to generate reliable, objective and reproducible data supporting the rational development of drug candidates intended to be administered to Humans.

Responsibility lies with the Company and its employees, and notably with the research and development department, to work accordingly to meet expectations of traceability, rigor and honesty, and to maintain objectivity in compliance with the Company's Quality System procedures.

3.2.Medical ethics in connection with conducting clinical trials

Innate Pharma performs research on and develops drug candidates for treating diseases for which medical needs remain unmet. The Company is committed to respecting the patients included in its clinical trials and to offering therapies with an expected benefit rate that is higher than the potential risks.

As part of clinical trials, the Company adheres to patient and donor informed consent rules. As part of the Declaration of Helsinki, clinical research and participation in clinical trials are not undertaken until approval from an Independent Ethics Committee and informed consent from the patient have been received.

Respect of privacy and data confidentiality are ensured for patients participating in clinical trials. Employees are committed to treating medical information confidentially and to protecting it from illicit use. This commitment is formalized in each contract established by the Company through confidentiality clauses. Data are anonymized.

4. PROTECTION OF COMPANY ASSETS

4.1.Proper use and protection of tangible and intangible Company assets

All employees should endeavor to protect and ensure efficient use of all of the Company's assets, whether tangible (IT, phones or laboratory equipment) or intangible (intellectual property, trademarks, patents, trade secrets, databases, development plans, salary information, financial data or unpublished reports). Theft, carelessness and waste are prohibited, and Company equipment should not be used for non-Company business, though incidental personal use may be permitted. Employees will preserve Company tangible or intangible assets from fraud or theft that could cause serious damage. Employees will ensure that samples or products provided for their activities are not used for any other purpose than their assays, nor anywhere else than in the Company's laboratories or those prescribed by third-party convention. Employees will ensure that these samples or products are not transferred to third parties without signing an MTA (Material Transfer Agreement) or a preliminary Company written consent form.

The Company's trademarks, brands, domain names and symbols must be used in a proper way and any unauthorized use by third parties should be reported to the Legal Department.

Employees should act honestly towards the Company, in accordance with their positions, delegations and current internal control rules. Fraud, which means deliberately misusing or diverting Company assets for personal enrichment, is formally prohibited.

4.2. Company intellectual property

Intellectual property comprises a set of valuable assets for the Company.

It includes know-how and/or trade secrets, scientific and technical data, study reports, inventions, discoveries, conclusions, information on processes, formulas, manufacturing, quality control and other similar information along with all related rights, notably patents and patent applications, copyrights and trademarks.

The elements in the Company's intellectual property represent major investments. Treating them thoughtlessly, lightly or recklessly could lead to irreparable damage to the Company, notably the possible loss of protection for inventions covered by rights, such as patents.

It should be pointed out that those elements (inventions, know-how, etc.) comprising intellectual property and related rights (patents, trademarks and other intellectual property rights) created by employees as part of their job belong to the Company. The Company is the only entity that can request patent protection for inventions.

To protect intellectual property rights, employees must:

- inform someone at the Intellectual Property Department of any discovery or technical invention that may represent a significant breakthrough for the Company or one of its research programs;
- discuss and validate with someone at the Intellectual Property or Legal Department before accepting confidential information from third parties;
- enter into confidentiality agreements before talking about any feature of the Company's or a third party's intellectual property rights;
- ensure that any required agreement is signed (confidentiality agreement, material transfer agreement (MTA), licenses, etc.) before sharing non-public information with a third party, notably scientific and technical information on processes, formulas, manufacturing, quality control and other similar information, as well as biological and chemical materials.

4.3. Confidentiality

All employees must ensure the confidentiality of all confidential information entrusted to them by the Company, its partners or its providers, except when disclosure is authorized by the Company or required by law or regulation. All employees must protect this information, must not disseminate it without the Company's consent and not use it for any purpose other than the strict framework of their activities.

The Company enters into confidential disclosure agreements (CDA) with partners in order to protect confidential exchanges of information, notably for patent protection.

When in doubt concerning the confidential nature of information, employees must ask their supervisor and check with the Legal and Intellectual Property Departments or with a member of the Executive Committee.

4.4. Disclosure of information and archiving

All reports and documents filed by the Company with governmental and regulatory agencies must contain fair, accurate, timely and understandable disclosures. The Company's records must be honest and exact.

4.5. IT systems and network security

The IT Department lays down security rules in order to protect the Company's IT systems and networks. It is up to each employee to be careful with materials provided and to avoid the loss, theft or destruction of elements

such as passwords, access codes, access keys, security codes, etc. An IT charter is provided to employees and appended to the Rules of Procedure.

The IT networks are protected against the loss of critical information related to the Company's activities.

4.6. Public statements and media relations

Employees and consultants are not authorized to speak in the Company's name without prior written consent. This rule concerns all kinds of communication and all means or channels of communication (radio, newspapers, television, blogs, social networks, etc.). This rule is designed to protect the Company's image. Only qualified persons can be in contact with the media and make public statements.

5. TRADING RULES

5.1. Conflicts of interest

A conflict of interest exists when a person's private interests interfere in any way with the Company's interests. Private interests must not interfere when selecting suppliers, for example. Conflicts of interest concern employees as well as their families.

All employees must avoid all situations that could give rise to conflicts of interest and should contact their supervisors when in doubt.

While under contract, no employee, consultant or member of the Executive Committee or Executive Board may enter into any kind of collaboration (financial, political or commercial) with a competitor, partner or supplier without prior written consent from the Company.

5.2. Corruption, gifts and benefits

The Company will not tolerate corruption. All employees take the commitment not to influence decision-making (supplier selections, contracts, etc.) in exchange for favors from a third party and conversely not to engage any form of corruption that could benefit the Company in relation to third parties.

Giving and accepting gifts is generally prohibited, but is allowed in some cases under strict rules. Gifts or entertainment should never be offered, given, provided or accepted unless it is not a cash gift, is consistent with customary business practices, is not excessive in value, cannot be construed as a bribe or payoff and does not violate any laws or regulations. The Company complies with Decree 2013-414 of 21 May 2013 and to its "Transparency" arrangements. All benefits provided to health professionals must be declared. It is very important that employees know the regulations and common uses. When in doubt, employees should ask the Legal Department for advice.

5.3. Theft of confidential information

Company employees should never attempt to get information on competitors by illegal means.

The theft and unauthorized use of confidential information on competitors, partners or suppliers, or inducing such disclosures by past or present employees of other companies, are prohibited.

5.4. Free competition

The Company complies with the rules and regulations governing free competition and does business honestly. It seeks to preserve its image and integrity.

- Competitor relationships ("horizontal agreements"):

All employees agree not to share company information, notably concerning our products, their production, our financial results, etc.

- Supplier and customer relationships (“vertical agreements”):

The Company agrees not to undertake anticompetitive practices that could alter competition between its suppliers and not to use its leading position in a sector to take advantage of said position.

5.5. Financial information

The Company’s communication with its stakeholders is transparent. This results in the regular publication of accurate, detailed and honest financial reports based on the best practices in financial communication and in accordance with current laws and regulations.

All financial data is checked by auditors and the Company has set up an internal audit process contributing to controlling its activities.

5.6. Code of Conduct for Securities Trading

The Company’s employees are committed to becoming aware of and respecting the Code of Conduct for Securities Trading. Employees may have access to insider information (any non-public information as defined in the Code of Conduct for Securities Trading). They are not permitted to use such information for stock trading purposes (buy, sell, get-buy or get-sell operations concerning the Company’s shares or listed companies that said information may concern). Such use would be an infringement to the present Code of Ethics, the Code of Conduct for Securities Trading and applicable regulations. In any case, employees may not share insider information until it becomes public through the proper authorized channels of communication. Employees may ask the Legal and Investor Relations Departments if they have any doubt concerning insider information.

6. PROCEDURES TO BE FOLLOWED IN CASE OF ETHICAL CONCERNS OR DOUBTS

When employees encounter ethical concerns, when they need advice in interpreting regulations or in reporting a presumed violation of the present code, they should refer the subject to their direct supervisor or to a member of the Executive Committee within a timeframe that allows them to provide advice or to make the appropriate decisions.

It is the responsibility of the supervisor or Executive Committee member to help employees to solve any difficulties they may encounter. When in doubt, the Legal or Human Resources Department, as well as external advisors, may be consulted.

7. SANCTIONS

In case of breach of the present code by employees, the Company may take any disciplinary actions needed as referred to in the Rules of Procedure.

Any violation of laws by an employee, a third party acting in the Company or on behalf of the Company may engage their responsibility and expose them to civil and/or criminal penalties.