INVENTIVA S.A.

CODE OF CONDUCT INTERACTIONS WITH HCPs

May 2026

Introduction

Inventiva S.A. and its affiliates ("Inventiva") are committed to building relationships with healthcare professionals ("HCPs") and healthcare organizations ("HCOs") that are grounded in integrity and a shared commitment to patients. Transparent, accurate, and fair interactions with the healthcare community are not only a regulatory expectation, but they are essential to ensuring that patients, HCPs, and HCOs can make well-informed decisions.

Most countries in which we operate have implemented laws and regulations governing interactions with HCPs and HCOs. Industry associations such as the European Federation of Pharmaceutical Industries Associations ("EFPIA") and the Pharmaceutical Research and Manufacturers of America ("PhRMA"), also maintain guidelines in this respect. Inventiva is committed to complying with all Applicable Laws pertaining to interactions with HCPs and HCOs. This Code of Conduct (the "Code") has therefore been adopted by Inventiva to provide guidelines for all interactions between Inventiva Personnel and HCPs or HCOs.

This Code addresses common types of interactions with HCPs and HCOs, including events, hospitality, donations, grants, sponsorship, services agreements, medical samples, gifts, informational or educational materials and items of medical utility. However this Code is not exhaustive. It should be read together with all other Inventiva policies and procedures and does not represent a complete statement of every rule or requirement that governs our interactions with HCPs and HCOs. Local laws and applicable industry codes may impose heightened or additional requirements beyond those expressly stated in this Code.

As a general rule, all interactions with HCPs and HCOs must be conducted in an ethical, fair, objective, truthful and transparent manner and in accordance with all Applicable Law and Inventiva policies. You must avoid interactions that are deceptive or that create conflicts of interest or bias.

All Inventiva Personnel must comply with this Code. Failure to follow this Code may trigger large fines for Inventiva and sanctions such as business shutdown, withdrawal of an approved product or marketing authorization and reputational loss. Inventiva Personnel who are found to be non-compliant also run the risk of individual fines or imprisonment. Due to the severity of the consequences, in order to protect our rights, Inventiva may take whatever steps are required against Inventiva Personnel who do not comply with this Code including disciplinary action, including termination.

If you have any questions about this Code or about any additional requirements that may apply in a particular situation, please contact your supervisor or Inventiva's Legal Department.

This Code provides:

- general guidelines on permitted activities;
- general guidelines on prohibited activities; and
- references to Inventiva's procedures to guide specific types of interactions.

This Code applies to all Inventiva Personnel who engage in or support interactions with HCPs or HCOs on behalf of Inventiva, irrespective of where you or the HCPs are located, including:

- interactions with HCPs that occur outside the territory in which such HCPs are admitted to practice;
- live interactions (e.g., face-to-face) and interactions in a virtual setting (e.g., exchanging information over audio or video conferencing).

Such interactions include, but are not limited to:

- Services provided by HCPs, including participation in clinical trials or Advisory Boards, consulting services provided under Consulting Agreements, and other services; and
- Scientific exchanges with HCPs in any form whatsoever, including but not limited to, written, oral, or printed exchanges and digital communications including social media.

The definition of the term "HCP" may vary from one jurisdiction to another. You are required to verify the scope of the term HCP in the applicable jurisdiction before pursuing activities involving HCPs in the jurisdiction where the activities are to take place and the jurisdiction where the HCPs are admitted to practice.

For multi-jurisdictional interactions, determination of which country rules apply is based:

- primarily on the country in which the HCPs is admitted to practice; and
- the rules of the country in which the HCP Service will take place.

Please note: some countries have more stringent requirements than others -- where the requirements of two countries could apply, you must follow the most stringent of these rules.

Please refer to Inventiva's country-specific guidance and requirements, available at on Sharepoint *at Compliance - Policies & Training - Tous les documents* or from the Compliance Officer, for further information regarding local requirements.

II. Definitions and Abbreviations

Term	Definition
Advisor	Investigator, academic personnel, clinical expert, or other healthcare professionals whose expertise can be relied upon by Inventiva in relation to emerging company scientific and, where permitted, business issues that may have implications for: • Understanding of diseases, epidemiology, existing therapies, and treatments • Clinical development plans and clinical study designs • Clinical gaps and generation of related plans • Planned disease state education • Product launch plans, Product strategy, and positioning within relevant markets • Other strategic issues facing Inventiva
Advisory Board	Forum in which discussions can take place between Advisors or Consultants that may have implications on: • Understanding of diseases, epidemiology, existing therapies, and treatments • Clinical development plans and clinical study designs • Clinical gaps and generation of related plans • Planned disease state education • Product launch plans, Product strategy, and positioning within relevant markets
Applicable Laws	All applicable international, federal, state, national and local laws, statutes, laws, regulations, statutory instruments and legally binding guidance relating to interactions with HCPs or HCOs, including without limitation; (i) anti-bribery and anti-corruption laws, (ii) laws governing inducements, gifts, hospitality, sponsorships, fees for services and other transfers of value, (iii) laws governing transparency and transfer-of-value disclosure and reporting requirements, (iv) fair market value standards, (v) laws governing the promotion of medicinal products and scientific exchange, and (vi) data protection and privacy laws, in each case as enacted, amended, or reinterpreted from time to time in any jurisdiction in which Inventiva operates.
Bona Fide	In good faith, without fraud or deceit.
Competent Authorities	The competent authorities in the countries where Inventiva carries out its activities responsible for, among other things, regulating and supervising, medicinal products and clinical trials.
Consultant	Third Party Vendor, including an HCP, engaged for the purpose of providing guidance, information, or feedback to Inventiva to meet legitimate business needs when such information is not reasonably available internally or not readily available through other means.
Consulting Agreement	Written business arrangement with an HCP who is compensated by Inventiva, in accordance with applicable internal company policies, Fair Market Value, and all Applicable Laws for Services rendered on a fee-for-service basis.
Donations and Grants	Collectively, mean providing funds, assets, benefits in-kind or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient to provide goods or services to the benefit of the donor in return. In general, donations include remuneration that is provided to not-for-profit, charitable organisations; and grants include: (i) educational grants (i.e., remuneration that is provided to support a bona fide, independent educational program), or (ii) research grants (i.e., remuneration that is provided to third parties to support the advancement of medical or scientific knowledge).
Educational Items	Items related to human health and diseases which are aimed directly at the education of HCPs, enhancing the provision of medical services and patient care.

Entertainment	Entertainment includes, but is not limited to, dancing or arrangements where live music is the main attraction, sight-seeing trips, theatre excursions, sporting events (e.g. skiing, golf or football match) and other leisure arrangements.
Events	All professional, promotional, scientific, educational meetings, congresses, conferences, symposia, and other similar events (including, but not limited to, Advisory Board meetings, and planning, training or investigator meetings for clinical trials and non-interventional studies) organized or sponsored by or on behalf of Inventiva or by a Third Party.
Fair Market Value ("FMV")	The price that a disinterested buyer (meaning a buyer without a vested or conflicting interest in the matter) would be willing to pay and a seller would be willing to accept on the open market or in an arms' length transaction assuming a reasonable period of time for an agreement to arise.
Fee-for-service	Engagement of a qualified HCP as a Consultant, Advisor or Speaker to perform a Service for Inventiva, including, but is not limited to consultation on product development, research, participation at Advisory Boards or Speaker Programs.
Gift	A monetary or in-kind advantage, benefit, favor.
Hospitality	Provision of food, beverage, accommodation, transportation and other amenities at Inventiva's expense to HCPs.
Healthcare Organization ("HCO")	Any organization, institution, association, or other legal person or entity that is involved in the delivery, financing, administration, oversight, or support of healthcare services, or that is managed by, run by or comprised of HCPs. Such entities may include but are not limited to hospitals, pharmacies, medical practices, physician groups, nursing homes, laboratories, group purchasing organizations, insurers, and health plans.
Healthcare Professional ("HCP")	Any natural person that provides health care services, including but not limited to any member of the medical, dental paramedical, pharmaceutical, or nursing professions, any medical or healthcare students or any other person who in the course of his or her professional activities may prescribe, purchase, recommend, refer, supply, administer, or arrange for the purchase of a medicinal product.
Inventiva Compliance Officer	The Inventiva Compliance Officer is a person to whom you can address any questions or concerns related to this Code or any other matters relating to regulatory compliance. In the absence of a designated Compliance Officer, Inventiva's Compliance Officer is Inventiva's Chief Legal Counsel. The Inventiva Compliance Officer may also designate additional individuals to assist in the performance of the duties of the Inventiva Compliance Officer.
Inventiva Personnel	All Inventiva officers, directors, employees, representatives, agents, or other individuals and entities providing services on Inventiva's behalf.
Meal	Refers to all food and beverages, including snacks, being provided to HCPs that is directly related to the services that they provide to Inventiva.
Medical Sample	Means a sample of medicinal product free of charge provided to persons qualified to prescribe or supply them so that they can familiarize themselves with new products and acquire experience in dealing with them.
Patient Organization ("PO")	A non-for-profit legal person/entity (including the umbrella organization to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers.
Personnel	Inventiva's officers, directors, employees, including Third-Party Vendors ("TPV"), agents, consultants, and any other individual or entity providing services/conducting activities on Inventiva's behalf. Includes persons employed by Inventiva either on a full-time or part-time basis and includes all workers or temporary workers.
Product	Any of Inventiva's products, including product candidates in development.
Service	Any function or activity provided for or on behalf of Inventiva by an HCP. Examples include, but are not limited to: (1) participation on an Advisory Board, (2) promotional or non-promotional speaking, (3) medical or scientific support or guidance in connection with

	clinical or other biomedical research, or (4) other functions or activities in which an HCP is engaged by or on behalf of Inventiva on a fee-for-service basis. For the purposes of this Code, a Service does not include functions or activities performed by a *bona fide* employee of Inventiva, or by any other person or entity who or which devotes substantially their full professional or business time or effort to performing functions or activities for or on behalf of Inventiva.
Speaker	Podium speaker, moderator and/or chair, who presents during a Speaker Program sponsored by the Company or a Third Party Event (Poster- and abstract-presenters are not considered speakers).
Speaker Program	An activity during which an approved HCP under contract with the Company presents information on Products, disease states or other healthcare topics to a group of HCPs and/or other appropriate attendees, as applicable, in accordance with Applicable Laws.
Sponsorship	Support provided by or on behalf of Inventiva, when permitted by Applicable Laws, as a contribution to support an activity (including an Event) performed, organized or created by a Healthcare organization, a Patient Organization or a Third Party.
Third Party Vendor ("TPV")	Individual or entity, such as an agent, contractor, subcontractor, consultant, supplier, outside marketing representative, or other vendor or persons authorized by written contract to engage in work on behalf of Inventiva and performing business activities, or providing services, for Inventiva or on behalf of Inventiva or its divisions.
Unsolicited	Not prompted, either directly or indirectly, solicited, or initiated by Inventiva.
Abbreviations	"EU" - European Union "EUR" - Euro "VAT" - Value Added Tax

III. Fee-For-Services Arrangements

Inventiva periodically obtains Services from HCPs in connection with legitimate Inventiva business needs and compensates HCPs for such Services. Even when such an engagement and the compensation is appropriate, paying or providing other compensation to an HCP to provide a Service can be perceived as an attempt by Inventiva to inappropriately influence the HCP to prescribe or use, or influence the prescription or use, of an Inventiva Product. As such, you must take caution to ensure that such engagements are consistent with this Code, all Inventiva policies, and Applicable Laws.

GENERAL RULES FOR ENTERING INTO CONSULTANCY AGREEMENTS WITH HCPS

Inventiva may engage a qualified HCP to perform a Service for Inventiva. This may include, but is not limited to consulting on product development, research, participation at Advisory Boards or Speaker Programs.

Inventiva may not engage an HCP, directly or indirectly, to perform or provide a Service with the intention to:

- induce the HCP to use, purchase, order, price, or prescribe an Inventiva Product; or
- influence or arrange for the use, purchase, order, pricing, or prescription; or
- reward the HCP for the use, purchase, order, price, or prescription of an Inventiva Product.

Consulting Agreements: minimum standards

All Inventiva Consulting Agreements must meet the following requirements and be otherwise permitted by Applicable Laws and all Inventiva policies, SOPs and Guidelines:

- The Service must be provided for the purpose of supporting healthcare, research or education and must not constitute an inducement to recommend and/or prescribe, purchase, supply, sell or administer specific Products.
- A legitimate Inventiva business need for the Service must be demonstrated and documented in accordance with the Inventiva Business Needs Assessment Form before engaging an HCP.
- Consulting Agreements and the related Service must be documented:
- in a written agreement signed by the parties and approved by the Legal Department before any Service is commenced or any payment for the Service is provided;
- based on Inventiva's HCP Consultancy Services template agreement to which no revisions shall be made without the prior written approval of the Legal Department.
- The HCP must be qualified to provide the Service and all necessary information must be available to demonstrate the HCP's qualifications before an agreement is signed.
    - Inventiva Personnel selecting the Consultant must:
        - select the Consultant based on clearly defined objective business criteria;
        - evaluate whether the Consultant meets the criteria and confirm in writing whether the related objective business criteria have been fulfilled;
        - have the necessary expertise to evaluate whether the Consultant meets the legitimate business needs for the Service and whether the criteria for selecting the Consultant are met; and
        - select the Consultant based on independent decision-making to prevent any potential bribery and corruption risks arising in connection with use of Consultants.
- Where required by Applicable Laws or employment rules, the Consultant must obtain, document and provide their employer's approval to Inventiva in writing before any written agreement is concluded in relation to the Consulting Service. In case of doubt as to whether this is required, please contact the Inventiva Legal Department.
- Many public authorities or institutions place strict limitations on Consulting Agreements. Competent Authority officials or other public authority officials or institution personnel may be prohibited from providing Consulting Services to Inventiva or may be required to document their eligibility to provide Consulting Services to Inventiva or seek prior authorization from their employers.
- Consulting Agreements with public authority officials or institution personnel must therefore be:
    - reviewed by the Inventiva Compliance Officer prior to any related agreement being concluded;
    - approved by the Inventiva Compliance Officer in writing in advance of entering into the Consulting Agreement.
- Meetings attended by Consultants:
    - must take place at venues that are conducive to the Services being performed, modest and appropriate taking into account Applicable Laws; and
    - the Consulting Services and activities related to the Services must be the focus of any meeting at which Consultants are present.
- Communications with Consultant:

    - Consulting Agreements for the purpose of speaking to Inventiva Personnel at Company meetings:
        - are only permitted subject to prior review and approval by the Inventiva Compliance Officer;
        - the subject of such speaking engagements must be approved in accordance with the Promotional Materials Policy; and
        - the Consultant must disclose that they will receive remuneration from Inventiva for their presentation at the beginning of the presentation.
    - Product specific information provided to a Consultant must be limited in scope to facilitate the *bona fide* service being provided.
- Compensation and payments provided in relation to the Consultant's services:
    - must be reasonable and based on their qualifications, expertise, and experience;
    - must reflect Fair Market Value ("FMV") for the Services being provided;
    - must be aligned with the Inventiva FMV guidance and documented in accordance with Inventiva's policies and procedures; and
    - may include reimbursement of reasonable documented expenses provided that:
        - expenses are reasonable and justified under the circumstances;
        - expenses are consistent with the Business Travel, Accommodation and Meals section below and Applicable Laws (including prior notification/approval by Competent Authorities, if applicable);
        - expenses are approved by the Inventiva Compliance Officer in advance; and
        - adequate invoices and proof of expenses are provided by the Consultant.
- Inventiva must never compensate Consultants for personal expenses associated with Consulting Agreements, such as Entertainment, or expenses associated with a spouse or other guest traveling with the Consultant.
- All payments and other transfers of value must be:
    - based on required documentation, both internal and external;
    - documented in records maintained in relation to the service;
- paid only into the HCP's professional bank account, if required by Applicable Laws; and
- subject to full disclosure in accordance with Applicable Laws.

Additional specific local laws and regulations may be applicable in some countries, including for research agreements (research and development, non-interventional studies, clinical studies).

Prohibited Activities

Inventiva must never use Consulting Agreements to try to induce an HCP/HCO to use, prescribe, purchase, or recommend Inventiva Products, reward past purchases, or influence research results.

Examples of prohibited activities include, without limitation:

- entering into Consulting Agreements for the purpose of influencing principal investigators or prescribers;
- entering into multiple or repetitive agreements to obtain Services which would duplicate Services or information that the Company has already obtained;

- providing information to or requesting information from a Consultant about Products which have not yet been authorized by Competent Authorities unless this is either as part of a clinical trial or in response to an Unsolicited request and has been approved in accordance with the Promotional Materials Policy in advance;
- entering into a Consulting Agreement with any supranational, national, public, governmental or local authority official or institution employee without prior written approval by the Inventiva Compliance Officer;
- providing payments to a Consultant by directing the payment to a charity or charitable organization on Consultant's behalf, or for Services that have not been rendered or before Services have been rendered;
- offering or agreeing to payments that make the assessment of FMV impossible or challenging (such as provision of shares or stock options in Inventiva or a monthly or yearly retainer).

Additional Rules For Advisory Boards

An Advisory Board is a forum in which Inventiva can obtain advice from Advisors and Consultants whose expertise meets Inventiva's legitimate business needs on emerging scientific and, where permitted, business issues that may have implications on the following:

- understanding of diseases, epidemiology, existing therapies and treatments relevant to Inventiva's field of interest;
- clinical development plans and study designs;
- other strategic issues facing the Company, including market access and reimbursement;
- planned disease education; and
- product launch plans.

Advisory Boards: Minimum Standards

All Consulting Agreements with Advisors in relation to Advisory Boards must meet the following requirements and be otherwise permitted by Applicable Laws and Inventiva policies:

- Consulting Agreements for Advisory Boards must:
  - meet the minimum standards for Consultancy Agreements;
  - always have a legitimate scientific or, where permitted, business need to seek advice, which shall be determined and documented in advance in accordance with the Inventiva Business Needs Assessment Form;
  - be the best way to satisfy the legitimate scientific or business need, and designed to do so in an efficient and effective manner
  - be based on Inventiva's Advisory Boards Template Agreement to which no revisions shall be made without the prior written approval of the Legal Department.
- Rules on Communications During Advisory Boards:
  - information about Inventiva Products that are provided at Advisory Board meetings must be consistent with data from Inventiva's clinical development programs, product authorizations, public disclosures or otherwise relevant to Inventiva's current or future clinical development or other strategic plans;

- all materials presented or provided as part of any Advisory Board meeting must be approved in writing and in accordance with Inventiva's Promotional Materials Review Policy before being provided;
- information provided by Inventiva at Advisory Board meetings must be limited to that which is necessary for the Advisors to perform their contracted Services;
- only Medical Affairs or Clinical Development Personnel may present data at an Advisory Board and solely to the extent the data fulfills all Minimum Standards for Consideration when Conducting Advisory Boards;
- Marketing and Commercial Personnel should not present data at an Advisory Board;
- any information provided in hard copy during an Advisory Board must be returned to Inventiva by Advisory Board participants at the end of the related meeting.

Prohibited Activities

Advisory Boards are not an opportunity for Product demonstrations, marketing presentations or other activities intended to influence the market. Advisory Boards may not be used for presentation of data that are not necessary for the Advisors to perform their contracted Services as part of the Advisory Board.

Additionally, the following activities are not permitted:

- use of materials that have not been approved in writing in accordance with the Promotional Materials Review Policy prior to the meeting;
- attendance by any guest of a Consultant, including a significant other, with whom Inventiva has not contracted and who is not legitimately attending any Event related to the Advisory Board in their own right and on the basis of an agreement individually concluded in writing between them and Inventiva;
- attendance by Inventiva Personnel at an Advisory Board meeting that is not based on legitimate Inventiva business needs;
- attendance by Inventiva Personnel where the number of Inventiva representatives is excessive and unreasonable based on the number of Advisors attending the event;
- attendance by Inventiva Personnel for any reason other than to moderate, present, monitor or obtain first-hand feedback, and/or manage the meeting (i.e., it would not be appropriate for an Inventiva employee to attend an Advisory Board merely to develop or maintain relationships with the Advisors).

IV. Events And Hospitality

WHAT IS AN EVENT?

Events include all professional, promotional, scientific, educational meetings, congresses, conferences, symposia, and other similar events (including, but not limited to, Advisory Board meetings, and planning, training or investigator meetings for clinical trials and non-interventional studies) organized or sponsored by or on behalf of Inventiva or organized by a Third Party.

EVENTS: MINIMUM STANDARDS

Inventiva may hold, sponsor or, in certain jurisdictions, support delegates to attend a wide range of Events, including meetings, provided such Events meet the requirements of this Code. This may include, where permitted by Applicable Law, support of HCPs now known to Inventiva via an HCO in accordance with Inventiva's policies and as approved in advance by the Compliance Officer.

- Scientific, Educational or Promotional objectives: The purpose and focus of any and all invitations to Events organized by Inventiva or a third party must be to provide scientific or educational information and/or to inform HCPs about Inventiva's Products. It should be the program content that attracts delegates to attend and not any associated Hospitality or venue.
- Appropriate and relevant content: the content of the Event must be appropriate and relevant to attendees. The Event program shall directly relate to the specialty and/or medical practice of the HCPs who attends the Event or be sufficiently relevant to justify the HCP's attendance and sponsorship, where permitted by Applicable Laws.
- Appropriate venue: the venue must be appropriate and conducive to the main purpose of the Event. Lavish, extravagant or deluxe venues must not be used. Venues that are renowned for their entertainment facilities must not be used.
- With the exception of congresses, Events must be held where it makes the most sense from a logistics standpoint to hold the event (ie in the country or state where the majority of the participants are located)
- International Events: Sponsorship of an HCP is subject to both the Applicable Laws of the country where the HCP is admitted to practice and the Applicable Laws of the country in which the Event takes place.
- Prohibition of Sponsorship of US-Licensed HCPs: Given Applicable Laws in the U.S., direct Sponsorship of US-licensed HCPs is prohibited. In such instances, Sponsorships shall be limited to third-party organizations in accordance with Inventiva's policies governing Sponsorships and as approved in advance by Inventiva's Compliance Officer.
- Entertainment: no Entertainment or other leisure or social activities shall be provided or paid for by Inventiva.
- Selection of HCPs: The purpose and focus of all invitations to Events organized by Inventiva or a third party shall be to provide scientific or educational information and/or to inform HCPs about Inventiva's Products.
    - The Event program shall directly relate to the specialty and/or medical practice of the HCP who attends the Event or be sufficiently relevant to justify the HCP's attendance and sponsorship, where permitted by Applicable Laws. To the extent permitted by Applicable Laws, Inventiva may select HCPs to receive Sponsorship funding if the following conditions are met:
        - Inventiva must not base the selection of HCPs to whom Sponsorship is provided on the actual or potential volume of business that such HCPs could generate.
        - Inventiva Personnel must use the following criteria in the selection of such HCPs:
            - Inventiva must provide Sponsorship to HCPs only in response to a related written Unsolicited request and in order to support the scientific and medical education and professional development of the HCPs;

    - the Sponsorship provided must have a direct relationship with the medical practice of the HCPs; and
    - Inventiva must not provide frequent Sponsorship to the same HCP or give the impression that recurrent support can be expected.
- Sponsorship provided to HCPs:
    - must be documented in detail and governed by a written agreement signed by the HCP prior to provision of the Sponsorship, setting out what has been agreed, and the categories of costs covered such as registration fees, accommodation and/or travel;
    - the rationale for the decision to provide support to an HCP to attend a meeting should be documented prior to the provision of support; and
    - where required by Applicable Laws, the arrangements must be approved by the Competent Authorities, professional organizations and the employer of the HCP.

Guests: Inventiva shall not pay any costs associated with individuals accompanying invited HCPs or for any other person who does not qualify as a participant in their own right.

- No payment may be offered or paid to individuals to compensate merely for the time spent in attending events/meetings.
- Reasonable Hospitality: Inventiva may pay for costs associated with the HCP attending the Event. Hospitality extended in connection with Events must be:
- limited to travel, meals, accommodation and genuine registration fees;
- not exceed the monetary thresholds of the relevant jurisdiction;
- where an Event takes place in a country other than the country in which the HCP is admitted to practice, the monetary threshold for meals (food and beverages) set in the country where the Event takes place (the "Host Country Principle") shall prevail.
- only be extended to persons who qualify as participants in their own right.
    - In exceptional cases of established health needs (e.g. disability or injury), the travel, meals, accommodation and genuine registration fee costs of an accompanying person can be reimbursed within the same parameters.
- “reasonable” in level and strictly limited to the main purpose of the Event; “Reasonable” means moderate in value.
- as a general rule, the Hospitality provided must not exceed what those individuals would normally be prepared to pay for themselves;
- strictly limited to the main purpose of Event, of secondary consideration and not out of proportion to the occasion
- Inventiva may only pay for costs associated with Reasonable Hospitality that comply with Applicable Laws and are in line with the Inventiva Restrictions on Hospitality
- hospitality provided in connection with Events may not include the sponsoring or organising of entertainment, sporting, or leisure events.

V. Bussiness Travel, Accommodation And Meals

Inventiva may from time to time in connection with Consulting Agreements, research arrangements and certain educational activities, provide modest accommodations, travel, and Meals to HCPs to facilitate appropriate meetings and interactions with HCPs.

Individual countries may establish individual requirements regarding permissible values and circumstances in which modest accommodations, travel, and Meals may be provided to HCPs.

Inventiva Personnel must ensure that any proposed interaction, activity, or arrangement does not breach Applicable Laws. Please refer to Inventiva's country-specific guidance and requirements, available on Sharepoint at Compliance - Policies & Training - Tous les documents for further information regarding national requirements of individual countries.

Personnel should consult with the Inventiva Compliance Officer on any question about such activity.

Business Travel, Accommodation And Meals: Minimum Standards

Any provision of accommodations, travel, and Meals must meet the following requirements and be otherwise permitted by Applicable Laws and Inventiva policies:

- there must be a documented and approved legitimate and bona fide business purpose for the expense;
- any prior notification or authorization that is required by Competent Authorities must be provided and/or obtained in writing before the engagement;
- when interacting with HCPs, the location for such interaction must be conducive and appropriate to the purpose of the meeting;
- meetings that require significant travel for the attendees must only be undertaken where there is a legitimate purpose for conducting the meeting at such location instead of holding it where the majority of attendees are located;
- modest accommodation, travel, and Meal expenses directly incurred during the legitimate performance of authorized services to Inventiva may, on provision of documentary evidence, be paid or reimbursed by the Company; and
- expenses submitted for reimbursement by the HCP must be incurred by the HCP and be reasonable and incidental to the legitimate Services provided to Inventiva.
    - Unnecessary expenses such as lodging or Meals past or outside of the engagement are prohibited.
    - Moreover, the HCP is expected to arrive as close to the beginning of the engagement and leave as close to the end of the last engagement as can be reasonably expected.

Meals

Reasonable and occasional Meals may be provided as a courtesy to an HCP when incidental to a legitimate business purpose and in compliance with this Code.

Meals may be provided by Inventiva representatives provided that:

- the Meal is provided to the HCPs on an occasional basis only;
- the Meal is offered in conjunction with a bona fide informational presentation or discussion that provides a recognizable and legitimate business purpose:
  - the informational presentation must provide scientific or educational value, such as discussion of Products or disease states relevant to Inventiva Products, or, where permitted, other legitimate business discussions related to an Inventiva Product; and
  - the Meal is not in conjunction with an Entertainment or recreational event.
- the Meal is incidental to the informational presentation or scientific or business discussion and may not distract from or overshadow the focus of the business or educational discussion;
- the number of HCPs who consume the Meal is conducive to the presentation of such information;
- the Meal is modest as defined by local standards and the amount spent for the Meal does not exceed the monetary threshold value permitted by Applicable Laws in the country or region where the HCP is admitted to practice or in which the Meal is provided, and defined in Inventiva's country-specific guidance and requirements, available on Sharepoint at inventiva - Travel Guidelines_v02_2026.pdf - Tous les documents ;
- the Meal is limited to in-office or in-hospital/clinic settings or in its nearest neighborhood (i.e. no "to go" meals);
- at least one Inventiva representative participates in the program or meeting during the Meal (either live or virtually);
- the Meal is provided to HCPs who attend the majority of the informational or educational component of the meeting;
- under no circumstances should an HCP's spouse or other guest be present during the meal, even if the HCP or guest agrees to pay for the cost of the meal, unless the spouse or guest is otherwise qualified to attend and is invited in advance, where applicable; and
- the Meal is not provided in cash or in cash equivalents (e.g., gift certificates for restaurant), and shall not include food gifts (e.g., box of chocolates or cookies, fruit basket, bottle of wine etc).

Business Travel, Accommodation And Meals: Inventiva Restrictions

Permitted levels of hospitality vary country-by-country. Please refer to the relevant country-specific guidance for information regarding local requirements, including the definition of "reasonable" in the relevant jurisdiction and limits on hospitality. Country specific guidance is available on Sharepoint at: Compliance - Policies & Training - Tous les documents.

If the requirements of two countries, e.g. the country where the HCP is admitted to practice and the country where the event takes place could apply, you must apply the most stringent of these rules.

In the event that the country specific guidance does not cover the type of hospitality you wish to provide, or there is no guidance for the country in consideration, hospitality must be limited to the values established in the table below.

Travel :	
Train	1st class rates
Flight	Economy for short & medium haul flights Business for long haul flights (more than 6 hours) AND if the HCP is presenting at the event the next morning
Car	Rental cars: only when justified by the length of stay and geographic area
Taxi	Only for transfers to or from the airport to the hotel or to the event
Meals (food and beverages)*	No alcoholic beverages outside of meals
Breakfast	Maximum of 15€ including tax and tips if not included in accommodation
Lunch	Maximum of 40€ per meal, including tax and tips
Dinner	Maximum of 60€ per meal, including tax and tips
Snacks	Maximum of 10€ per snack including tax and tips limited 2 snacks per day
Accommodation* (includes breakfast)	Must be absolutely necessary, related to and focus on the Event purpose Shall not cover a period of stay beyond the official duration of the Event Shall not be at top category or luxury hotels Maximum 200€ per night, tax included
Actual registration fees	Linked to the Event and local regulations

*Amounts include all taxes

VI. Gifts, Non-Educational Items, Entertainment And Recreation

The giving or receiving of gifts, invitations and hospitality may be perceived or construed negatively and may negatively impact the reputation of the individual and Inventiva.

Interactions with HCPs must be geared towards educating and informing HCPs about diseases and, where relevant, Inventiva research and development programs. Relationships with HCPs must remain professional and must not convey the appearance of impropriety.

Applicable Laws limit or prohibit the provision of items of value to HCPs out of concern that such items will impact independent medical decision-making and unduly influence HCP prescribing or referral decisions.

Can Inventiva Personnel offer or provide Gifts, non-Educational Items, Entertainment, or recreation to HCPs?

No, Inventiva Personnel may not offer, arrange for, or provide any Gifts, non-Educational Items, Entertainment, recreational, or leisure items to any HCP in any circumstances.

Examples of prohibited items include, but are not limited to the following:

- cash or cash equivalents (e.g., gift cards)
- any transfers of value to HCPs that could be perceived as a Gift
- non-Educational Items (e.g., pens, note pads, mugs, etc.)
- medical equipment and supplies (e.g., stethoscopes, tongue depressors, ice packs, etc.)[1]
- personal items (e.g., birthday gifts, flowers, wine, concert tickets, etc.)
- items with an independent value (e.g., DVD or CD player, flash drives, etc.)
- free services directly (or through a vendor) to any HCP with the intent of saving an HCP time or increasing profits or business for an HCP
- business referrals
- Promotional aids — i.e., non-monetary items given for a promotional purpose

These Items shall **not** be offered to HCPs/HCOs or members of their staff, even if they are of minimal value, accompanied by patient or physician Educational Items, with or without Inventiva or product logo.

VII. Informational or Educational Materials and Items of Medical Utility

Can we provide Informational or Educational Materials ?

Yes, BUT the materials must be:

- modest in value;
- directly relevant to the practice of medicine or pharmacy; and
- directly beneficial to the care of patients.

Can we provide Items of Medical Utility ?

Yes, BUT the Items must:

- be modest in value;
- be aimed directly at the education of HCPs and patient care; and
- not offset the routine business practices of those who receive them.

In addition, the Informational or Educational Materials and Items of Medical Utility provided must:

- not constitute a circumvention of the prohibition on Gifts set forth in this Code,
- not constitute an inducement to recommend and/or prescribe, purchase, supply, sell, or administer a Product.

[1] NOTE: This does not include clinical trial equipment provided to support clinical trials or clinical investigations when provided consistent with applicable law, Inventiva's applicable policies and procedures and supported by a related written agreement.

- be modest in value: less than 30 euros TVA cumulative on an annual basis or as otherwise defined in Inventiva's country-specific guidance and requirements available on Sharepoint at: Compliance - Policies & Training - Tous les documents ;
- not be given in the form of cash or cash equivalents;
- be offered only on an occasional basis;
- not be product branded, unless the Product name is essential for the correct use of the material or item by the patient. Informational or Educational Materials and Items of Medical Utility may include the Inventiva name;
- not have any independent value to the HCP outside of their professional responsibilities.

Examples of permissible Informational or Educational Items include:

- medical textbooks;
- examination room anatomical models;
- journal subscriptions;
- copies of clinical treatment guidelines; and
- other written informational materials.

VIII. Medical Samples

Can We Provide Directly Or Indirectly Samples To Hcps?

Samples shall not, in principle, be provided to HCPs, except on an exceptional basis and in accordance with the conditions set forth below.

Samples must not be given as an inducement to recommend and/or prescribe, purchase, supply, sell or administer specific Products, and must not be given for the sole purpose of treating patients.

(1) BEFORE Inventiva has a duly authorized product on the market

Inventiva may NOT provide samples to HCPs.

(2) AFTER Inventiva has a duly authorized product on the market

But only if the Samples meet ALL of the following conditions:

- The Inventiva Product for which Samples are supplied is authorized in the country of distribution
- The Samples are provided to an HCPs to enable them to familiarise themselves with Inventiva's authorized product and acquire experience dealing with it
- Maximum of 4 samples per product, per HCP, per year
- Only take place during the first 2 years after the HCP first requested Samples (the "4x2" standard)
- On an exceptional basis, a longer period than 2 years may be permitted where required by local healthcare conditions and permitted by the applicable national code

- Only be given upon receipt of a dated and signed written request from an HCP authorized to prescribe such product
- Be no larger than the smallest package form of the medicinal product in the country of distribution
- Be marked “free medical sample - not for sale” & accompanied by a copy of the Summary of Product Characteristics
- Be recorded – Inventiva must maintain adequate systems of control and accountability for Samples distributed, including a record for each HCP of the names of persons receiving samples, dates on which Samples were provided, and the number and type of Samples distributed
- Not be provided directly by Inventiva to patients
- Be made in accordance with local law

IX. Donations, Grants and Sponsorship

Inventiva Personnel must never:

- solicit requests for Donations, Grants, Sponsorship, investigator-initiated studies or other similar support;
- directly respond to Unsolicited requests for Donations, Grants, Sponsorship, investigator-initiated studies or other similar support to HCPs, HCOs or POs.

Inventiva Personnel must submit any Unsolicited requests for Donations, Grants, Sponsorship, investigator-initiated studies or other similar support to Inventiva Medical Affairs for review and approval.

Only Inventiva Medical Affairs may respond to such Unsolicited requests for Donations, Grants, Sponsorship, investigator-initiated studies or other similar in accordance with Inventiva Policies on Funding, related SOPs and Guidelines.

X. Communications With HCPs

General Rules Regarding Communications With Hcps

All Inventiva Personnel are responsible for communicating in a truthful and ethical manner with HCPs.

Inventiva Products that have not been authorized in the respective jurisdiction may not be promoted in such jurisdiction. This includes promotion to the general public and to HCPs.

Information may, however, be exchanged with HCPs either:

(1) In response to a related Unsolicited request from the HCP, within the context of a clinical investigation, or

(2) Within the context of scientific exchange.

Communications with HCPs regarding Inventiva Products must comply with all Applicable Laws and Inventiva policies, including, but not limited to Inventiva’s Promotional Materials Review Policy, and fulfill the following requirements:

- be accurate, balanced, fair, objective, up to date, and sufficiently complete to enable the HCP to form their own opinion of the therapeutic value of the Product concerned;
- present material facts about the Product being discussed, including facts about negative clinical outcomes that could result from participation in a clinical trial or other use (e.g., data cannot be omitted or selectively chosen);
- be adequately substantiated by clinical data;
- for an approved product, be consistent with the scope of relevant marketing authorization granted by the European Commission, Competent Authorities or other regulatory authorities, and the clinical data relied upon by these regulatory authorities to grant an authorization;
- be appropriate for the targeted audience;
- be approved in accordance with the Promotional Materials Review Policy for use or distribution.

Communications: Prohibited Activities

Unless otherwise approved by an Authorized Officer, Inventiva Personnel must never:

- distribute or use materials or messages that have not been approved in writing by in accordance with Inventiva's Disclosure Policy, Promotional Materials Review Policy and other policies (e.g., posting messages containing Inventiva business or confidential information to social media accounts);
- alter or modify materials approved in accordance with such policies, such as by highlighting, deleting, editing or adding notes or other material;
- provide medical advice to a patient;
- interact with patients unless specifically authorized in writing by Medical Affairs to do so and trained as needed;
- engage in pre-authorization promotion (e.g., represent in a promotional context that an investigational Product or pipeline Product is safe or effective for the purposes for which it is not yet authorized or is still under investigation);
- solicit, prompt, encourage, suggest, or otherwise cause an HCP to submit a request for off-label information, ask a question about an off-label use, or enter into a discussion about off-label information.

Unsolicited Requests For Off-Label Information : Questions About Unapproved Products And Uses

Inventiva Personnel must never directly respond to Unsolicited requests for information for Off-Label Information from HCPs.

If Inventiva Personnel receives an Unsolicited request from an HCP for off-label information, Inventiva Personnel must submit the Unsolicited request to Medical Affairs for response.

Examples of such requests may include:

- requests for disease information that go beyond the disease definition used in Inventiva's clinical trials;
- questions about clinical trial design or data from Inventiva's clinical trials or interpretation thereof; and

- questions about unauthorized Products or uses including investigational or pipeline Products;
- Questions about uses or variations to existing marketing authorizations that have not yet been authorized in a particular jurisdiction, as applicable.

Only Medical Affairs may respond to Unsolicited request. When responding to such requests, Medical Affairs must assure that:

- No sales representatives are involved or participate in the discussion or exchange;
- The information shared in response to an Unsolicited request or question is:
  - limited to objective, factual, balanced, sufficiently complete to enable the HCP to form their own opinion of the therapeutic value of the Product concerned, up-to-date information that is substantiated by scientific data, including: factual and objective presentation of the results of clinical trials; reprints of peer-reviewed articles and scientific conference posters that have been approved for dissemination in accordance with Company procedures
  - non-promotional and should not include or make reference to Promotional Materials;
  - tailored to answer or address only the specific Unsolicited question or request received and does not go beyond the information needed to answer the question or request;
  - directed only to the specific individual who requested the information as a private, individual communication; and
  - a prominent statement notifying the recipient that the Products or the use addressed in the response provided, as applicable, has not been authorized by the competent authorities in relevant jurisdiction, as applicable;
  - All responses to Unsolicited requests must be in writing and documented.

Scientific Information

Scientific information relating to unauthorized Products or uses, including an investigational Product, may be shared between Inventiva and HCPs who act as investigators involved in clinical trials in relation to which Inventiva is acting as the sponsor, provided that the information:

- clearly discloses the investigational status of the Product (e.g., it is under investigation and is not approved by the relevant competent authorities, and it is not a “new treatment” or “new medicinal product”);
- is communicated in an accurate, balanced, fair, objective, up to date, and sufficiently complete to enable the HCP to form their own opinion of the information that is provided in relation to the investigational Product concerned;
- does not draw any conclusions suggesting that the Product is safe or effective for any investigational use;
- provides a fair and balanced disclosure of safety data and risk information;
- is not false or misleading in any respect, but truthfully and accurately presents all material information;
- is non-promotional in intent, tone, and context;

Examples of this type of scientific exchange are:

- presentations and discussions of study protocols with investigators and study teams;
- in so far as is permitted by Applicable Laws, publication of results from scientific studies in peer reviewed journals;
- scientific presentations of clinical study results within the context of scientific exchange;
- exchanges of medical and scientific information within the context of Advisory and Consulting activities provided by HCPs within the context of activities led by medical or scientific departments.

Adverse Events & Product Complaint Reporting

Inventiva is required to report adverse event information associated with the use of Products to Competent Authorities in compliance with Applicable Laws.

If, during the course of any interaction with an HCP, any Inventiva Personnel becomes aware of adverse events or receive a complaint involving a Product, they must report this information in writing consistent with Inventiva's policies for Reporting Adverse Events and handling complaints.

Other Communications

All Unsolicited requests from HCPs about potential Consulting Agreements shall be forwarded to Medical Affairs for their review. No Inventiva Personnel shall offer, promise, solicit, or encourage HCPs to request such engagements.

XI. Transparency

Inventiva is required by Applicable Laws governing transparency to track and report certain payments or other transfers of value to HCPs. All Inventiva Personnel must comply with this obligation and track and submit all applicable payments or transfers of value accurately and in a timely manner, including those activities and expenses managed by a third party service provider on behalf of Inventiva.

XII. Compliance And Procedures

To support compliance with this Code, Inventiva is implementing training and review as part of our broader compliance programs overseen by the Legal Department. The Inventiva Compliance Officer is a person to whom you may address any questions or concerns related to this Code or any other matters relating to legal or regulatory compliance.

Please note that relationships with HCOs, HCPs and POs are also governed by other Inventiva rules and procedures, in particular rules on Anti-Bribery, Code of Business Conduct and Data Protection. Please refer to Inventiva's policies on these issues for further details. If you have a question or concern about an activity or conduct that could potentially be in breach of law or Inventiva policy, contact the Inventiva Compliance Officer.