



DISCLOSURE POLICY

Date: May 1, 2026

Inventiva SA (the “Company”) is a publicly traded company listed on Euronext Paris in France and the Nasdaq Global Market in the United States. The Company is required to comply with applicable French stock market rules, including the “Code Monétaire et Financier” (the French Financial and Monetary Code), the “Règlement Général” (the “General Regulations”) of the “Autorité des Marchés Financiers” (the “AMF”), and the European Regulation (EU) No 596/2014 (the “Market Abuse Regulation” or “MAR”) (together, the “French Stock Market Rules”). These rules impose certain periodic and ongoing disclosure obligations in the interest of investor protection and reputation of the market. Additionally, for as long as the Company qualifies as a foreign private issuer, the Company may choose to voluntarily comply with Regulation Fair Disclosure (“Regulation FD”) under the Securities Exchange Act of 1934, as amended, to avoid potential liability that could arise from selective disclosures (e.g., from “tipping” securities analysts or select shareholders intentionally or unintentionally) of important nonpublic information by issuers before the information is more broadly released to the general public. The Company is committed to meeting its disclosure obligations in accordance with these principles in order to support investor confidence in the integrity of the Company.

This disclosure policy (the “**Policy**”) is intended to allow the Company to comply with its obligations in respect of the protection and disclosure of “**Inside Information**” or “**Material Non-Public Information**” (as defined below) concerning the Company, as well as its continuous disclosure obligations concerning all other important non-public information. It is intended to ensure required announcements are made in a timely manner, are factual, do not omit any material elements and are expressed in a clear and objective manner, as well as to help prevent market abuse, inadvertent selective disclosure, insider dealing and other similar offences.

Accordingly, all directors, officers and employees of Inventiva must familiarize themselves and comply with this Policy. The Compliance Officer is responsible for monitoring compliance and safeguarding confidentiality of Inside Information. Please direct all questions or concerns regarding this Policy to Inventiva’s Compliance Officer, or if a Compliance Officer has not been appointed, to Inventiva’s Chief Legal Officer (“**CLO**”). Non-compliance with the rules set out in this Policy and, in general, with applicable regulations, may cause serious harm to the Company and subject the Company to penalties and other sanctions. This Policy should be read in conjunction with, and supplements, Inventiva’s other policies, including its Insider Trading Policy, and the terms of any applicable agreement between you and the Company, including any confidentiality provisions therein.

THE REQUIREMENTS

French Stock Market Rules

Under the French Stock Market Rules, any Inside Information or other material information which concerns the Company must, as soon as possible, be disclosed to:

- the public; and
- the AMF.

All communications to the public must be simultaneously released through the primary information provider selected by the Company from the list of AMF providers.

US Securities Laws

Unless otherwise authorized by the Chief Executive Officer (“CEO”), Chief Financial Officer (“CFO”) and CLO (the “**Authorized Officers**”), no persons acting on behalf of the Company may disclose Inside Information to an Outside Person (as defined below).

For purposes of this Policy, an “Outside Person” is defined as:

- broker dealers and their associated persons, such as analysts;
- investment advisors, institutional investment managers and each of their associated persons;
- investment companies, hedge funds and each of their affiliated persons; and
- any holder of the Company’s securities if it is reasonably foreseeable that the holder will purchase or sell the Company’s securities on the basis of the information.

The following communications are exempt from the Regulation FD disclosure requirements:

- communications made to a person who owes the Company a duty of trust or confidence, such as attorneys, investment banks or accountants;
- communications made to any person who expressly agrees to maintain the information in confidence, even if the express agreement is given after the disclosure of Inside Information, but must be before the recipient discloses or trades on the basis of the information; and
- communications made in connection with registered securities offerings by means of specifically approved forms of written or oral communications other than offerings expressly excluded under Regulation FD.

Inside Information

Inside Information is information that has not been made publicly available. Nonpublic information, whether positive or negative, may be significant or material if it is likely to have an effect on the price of the Company’s securities or could influence an investor’s decision to buy or sell the Company’s securities. It is not always easy to figure out if the information you have is Inside Information. A simple test is this: if the information is made public, would the information have a significant effect (upward or downward) on the Company’s securities? If the answer is “yes,” then this means that a reasonable investor might use such information to decide whether to buy or sell the Company’s securities and it is Inside Information.

For example, common types of Inside Information include:

- financial results, plans or forecasts;
- earnings estimates and guidance, including updates, changes or confirmation of previous guidance;

- significant changes to the Company's financial situation, strategy or operating income;
- status of product or product candidate development or regulatory approval;
- clinical data relating to products or product candidates;
- timelines for pre-clinical studies or clinical trials;
- significant external growth transactions or significant acquisitions or dispositions of (buying or selling) assets, divisions or entire companies;
- entry into new material contracts or amendments;
- public or private sales of debt or equity securities;
- stock splits, dividends or changes in dividend policy;
- gaining or losing a major partner, such as a significant licensor, licensee or supplier, or changes or new corporate partner relationships or collaborations;
- developments regarding the Company's material intellectual property (including issuance or denial of patents);
- regulatory developments;
- changes in management, senior leadership or other significant personnel or control changes;
- employee layoffs;
- a disruption in the Company's operations, including security breaches of facilities or IT systems;
- tender offers, repurchase programs or proxy fights;
- change in auditors or auditor notifications that the Company may no longer rely on an auditor's audit report;
- corrections to previously issued financial statements (accounting restatements);
- significant lawsuits or settlements; and
- possible bankruptcy.

As it can be difficult to determine whether information is material, please discuss with the Compliance Officer in case of doubt.

PRIMARY PROCEDURE

All directors, officers, employees, representatives and consultants of the Company must familiarize themselves with this Policy and the importance of compliance.

Authorized Officers must be informed immediately when any potential Inside Information or other material information becomes available.

The Authorized Officers will determine if such information is Inside Information and will decide how and when to disclose such information (or to delay disclosure of Inside Information if appropriate). The Authorized Officers may consult with other directors, officers or employees of the Company, the Company's external lawyers and/or its financial adviser(s) in making this decision. If disclosure is required or advisable, an Authorized Officer will authorize the necessary disclosure (unless a delay in making an announcement is permitted) and also ensure publication of such information on the Company's website as required.

If disclosure of certain Inside Information is not required, it is the Company's policy not to release such information, unless:

- the Company has regularly disclosed that type of information in the past or the Authorized Officers have otherwise determined that it is advisable to disclose such information in order

- to ensure market integrity; and
- such release is made in compliance with this Policy.

The Company will follow a “No Comment” policy. The Company will not respond to inquiries about rumors, potential transactions or unusual market activity in the Company’s securities.

In performing your duties on behalf of the Company, you must ensure that:

- the number of people with access to confidential information is limited;
- confidential documents are locked up and code names are used if necessary; and
- all employees, representatives and consultants are educated about the need to keep certain information confidential, not discuss confidential information which may be overheard, and not discuss investments in the Company’s securities.

If a Company director, officer, employee or consultant who is not a spokesperson believes that they may have disclosed Inside Information, or believes Inside Information has been leaked, such person must immediately notify an Authorized Officer of the information disclosed, the person to whom the information was disclosed, and any other pertinent information regarding the disclosure. After notification, the Authorized Officers will determine whether to disclose the information in the manner prescribed in this Policy.

METHODS OF PUBLIC DISCLOSURE

Public disclosure will be made by:

filing or furnishing a report with the Securities and Exchange Commission (“SEC”); or another method (or combination of methods) of disclosure reasonably designed to provide broad, non-exclusionary distribution of information to the public, such as:
a press release distributed through a widely disseminated news or wire service; or
an announcement made at a press conference, webcast or conference call, if the public is given adequate advance notice of the conference, webcast or call and the public is granted simultaneous access to the conference, webcast or call either by telephonic and/or electronic transmission, which is reasonably designed to provide broad, non-exclusionary distribution of the information to the public.

ANNOUNCEMENTS

Contents of Announcements

If you are responsible for preparing an announcement, you must ensure that:

- the statements, figures, forecasts or other information provided in such announcement are not misleading, false or deceptive and do not omit anything which might affect the meaning of such statement, forecast or information;
- the announcement complies with all requirements set out in the applicable rules on publicly listed securities, for example, in relation to dealings by persons discharging managerial or directorship responsibilities (and their related persons);
- the announcement complies with all other applicable legal or regulatory obligations;
- the announcement does not include any statements designed to market or promote the Company's activities that would result in the announcement becoming misleading, e.g. where an adverse event or circumstance is obscured by other more positive matters; and
- you have verified the contents of the announcement. The nature and extent of verification will depend upon the subject matter of the announcement but should include confirmation as to

the accuracy of facts, where necessary from management.

Vetting and Authorization Processes

The Company's procedure for review and release of Company announcements and press releases is as follows:

- Save in exceptional circumstances, all external communications, including announcements, press releases, presentations, and website and social media postings and other digital communications must be reviewed and authorized by an Authorized Officer who will consult with the Company's Medical, Legal, and Regulation Review Committee pursuant to the Company's compliance policies.
- The following external advisers should also be consulted as appropriate:
- financial advisers;
 - PR/IR firm or consultants;
 - Regulatory advisers;
 - lawyers; and
 - auditors.
- Unless otherwise instructed by an Authorized Officer, all persons named in the announcement should be given the opportunity to review the announcement prior to its release to confirm all information is factually correct, material information is not omitted, and it is expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.
- An Authorized Officer must authorize the final release.

Financial Statements

- All annual financial statements, half-year financial statements and quarterly financial information are reviewed by the audit committee of the Company's Board of Directors and all annual financial statements, half-year financial statements and quarterly financial information are approved by the Board of Directors, or by duly designated members of the Board of Directors.

Release of Public Announcements

- Only an Authorized Officer can authorize public announcements for release.
- All announcements must be available publicly on the Company's website and the Company must ensure of the complete and effective dispatch of all announcements. The Company may rely on a professional dispatcher (including a primary information provider or "*diffuseur professionnel*" within the meaning of article 221-4 IV of the General Regulations of the AMF) to whom it shall send such announcements for dispatch through electronic means.
- The Company must notify Nasdaq's MarketWatch Department prior to the public release of Inside Information or other news in accordance with Nasdaq listing rules.

DELAYED ANNOUNCEMENTS

As an exception to the prompt disclosure requirement set forth above, the Authorized Officers may delay disclosure of Inside Information if all the following conditions are satisfied:

- immediate disclosure is likely to prejudice the legitimate interests of the Company;
- delay of disclosure is not likely to mislead the public and the deferred information is not in contradiction with the last publicly disclosed information; and
- the Company is able to ensure the confidentiality of the information.

For example, the Company may delay disclosure (provided that the conditions referred to above are satisfied) in the following situations:

- the Company is conducting negotiations and the outcome of such negotiations would likely be jeopardized by disclosure (e.g., M&A transactions, spin-offs, disposal of major assets, etc.); or
- the Company has developed a product, product candidate or a technological invention and the immediate public disclosure of that information is likely to jeopardize the intellectual property rights of the Company.
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If disclosure of Inside Information is delayed, the Company must keep a record of the following information:

- the dates and times when:
 - the Inside Information first existed;
 - the decision to delay disclosure was made; and
 - the Company is likely to disclose the Inside Information;
- the identity of the persons responsible for:
 - making the decision to delay disclosure;
 - monitoring the conditions for the delay;
 - making the decision to publicly disclose the Inside Information; and
- providing information and explanations about the delay to the authorities;
- proof that the conditions for delayed disclosure have been met, and of any change of these conditions, including the means implemented to ensure protection of the Inside Information for which disclosure is delayed.

When the delayed Inside Information is disclosed, the Company must send the following information to the AMF by email at differepublication@amf-france.org:

- the identity of the Company;

- the identity and contact details of the person making the notification: name, surname, position within the Company, work email and phone number;
- identification of the Inside Information that was subject to delayed disclosure: title of the disclosure statement; the reference number where the system used to disseminate the Inside Information assigns one;
- date and time of the public disclosure of the Inside Information;
- date and time of the decision to delay the disclosure of Inside Information; and
- the identity of all persons responsible for the decision to delay the public disclosure.

ONGOING DISCLOSURE

Company Spokesperson and Media Enquiries

All public disclosures of information and communications and all contacts with analysts, existing investors, potential investors, the media or the general public must be made in accordance with the following:

- All public disclosures of information and communications shall be made by an authorized spokesperson of the Company. No other individual is authorized to communicate about the Company or disclose Inside Information regarding the Company to any third party without the prior consent of an Authorized Officer. The Company shall keep the number of spokespersons authorized to speak on behalf of the Company to a minimum.
- The Company has designated the following individuals as the Company's authorized spokespersons:
 - the Company's CEO;
 - the Company's CFO;
 - the Company's Chief Medical Officer; and
 - the Company's EVP External and Corporate Affairs
 - the Company's Head of IR
- With regards to any queries from the media, the primary spokesperson for the Company is the CEO. If you are contacted directly by a journalist or other media representative, do not answer their questions but take the name and contact details and refer the information to the CEO and/or EVP External and Corporate Affairs.
- The CEO is also the primary spokesperson in responding to enquiries from institutional and other large shareholders, stockbrokers and analysts as well as enquiries from small shareholders. Accordingly, all enquiries from such persons must be directed to the CEO and the CFO. When the CEO is not available to answer a particular enquiry, the CFO then takes responsibility for that enquiry as appropriate.
- The CEO is responsible for ensuring that public disclosures of information relating to the Company are constantly monitored and is responsible for the accuracy of such information. In addition, the CEO will ensure that copies of material public announcements of the Company are distributed on a timely basis to the Board of Directors as well as relevant Board committees.

Conference Calls

The Company may schedule conference calls from time to time to discuss financial results or other information that may be material to the investing public and the securities industry. The procedures applicable to such conference calls are:

- A reasonable time prior to the call, the Company will issue a press release announcing the time, date and dial-in information of the call and a description of the Inside Information to be discussed.
- The Company will not selectively disclose any additional Inside Information after a conference call and will only disclose new information on a conference call if the conference call is held in compliance with the French Stock Market Rules and Regulation FD.
- A transcript or audio file of the conference call, including any other summaries of the conference call, may be posted on the Company's website.

Private Meetings

Authorized spokespersons of the Company may engage in private meetings with financial market analysts and investors solely for the purpose of clarifying previously disclosed information, provided that these meetings are authorized in advance by the CEO. These private meetings must not involve the disclosure of Inside Information and it is best practice for at least two individuals to attend every such meeting. The spokesperson will not confirm any previous financial guidance or forecasts under facts and circumstances that make the confirmation itself material, unless such information, update or confirmation is contemporaneously made available to the public in a manner consistent with this Policy.

If Inside Information is inadvertently disclosed, you must immediately inform an Authorized Officer to enable them to announce the information publicly immediately.

If an analyst asks a question which touches on a price-sensitive area, you may only answer with publicly available information. You must take all reasonable measures to ensure that all statements, forecasts or other information you provide are not inaccurate, misleading, false or deceptive. Where this is not possible, you must decline to answer the question, or take it on notice and refer the matter to the CEO.

Presentations

An Authorized Officer must approve all of the Company's financial, regulated or other public disclosures and audiovisual engagements covered by this Policy in advance.

If you are presenting in a capacity on behalf of the Company, you must ensure that all presentations:

- do not contain Inside Information unless such information is also being simultaneously publicly announced;
- have been verified; and
- where any of them is made in support of an announcement or contains information that will be announced, that such presentation and the announcement are aligned.

You must ensure that relevant management and external advisers have been allowed to review and comment on the document at appropriate stages during its preparation.

Scripts & Q&As should generally be prepared and subject to the same scrutiny as presentations. The Company should ensure equal and concomitant access to the information made available to

financial analysts. In practice, this will be done through webcasts of presentations to analysts and postings of slideshows made available on the Company's website.

Review of draft Analysts' Reports / Articles

You may sometimes be requested to review draft analysts' reports and articles on the Company prior to publication. In such instance, you must use utmost care in any review and preferably decline any input. Any input shall in any case in such instances be restricted to amending factual errors.

Under no circumstances may you expressly or impliedly approve or disapprove the financial projections or other information outside the information that is publicly available.

Annual Reports, Periodic Reports and Company Literature

The Company must regularly provide an annual report on the Company's financial condition and related business performance following fiscal-year end. Interim reporting of the Company's financial and business performance may be provided quarterly or half-yearly between annual reports or at such other interval as is required by applicable law or otherwise advisable. Annual reports and interim reports, if any, will be made available in a manner reasonably designed to provide broad, non-exclusionary distribution of the information to the public.

The Company Website and Social Media Channels

The Company intends to use its website and certain other social media channels to provide access to:

- public announcements;
- company presentations;
- company contacts; and
- other relevant information.

The Company endeavours to ensure that no inappropriate information is placed on its corporate website and to keep the website maintained and up-to-date. Written materials placed on the website shall include a reference to appropriate cautionary disclosures and/or disclaimers in order to take advantage of the U.S. safe harbor under the Private Securities Litigation Reform Act of 1995.

You may not use social media, including corporate blogs, chat rooms, chat boards, Facebook, LinkedIn, Instagram, Reddit, Clubhouse, TikTok, Medium, X, Youtube, the Motley Fool, Raging Bull, Yahoo! Finance and other non-traditional means of communication to disclose information about the Company or other companies with which the Company does business, even if done so anonymously, without the prior approval of an Authorized Officer. This prohibition applies regardless of whether the posting is made in an individual capacity or if the social network is accessed at an individual's home or at the office or anywhere else.

The Company may use approved social media channels from time to time to disclose information management believes is important to be disseminated or of use to the public. All information disseminated on Company accounts on any social media channel (e.g., X, Facebook, Instagram, Medium, TikTok, etc.) must be approved by an Authorized Officer prior to posting. All postings to any Company account on any social media channel, other than ordinary course marketing or advertising or responses regarding customer experience, must be reviewed and approved by an Authorized Officer prior to posting.

In addition, the following guidelines apply to social media posts and digital communications by the Company:

- each post and digital communication must be dated and electronically archived;
- if space is limited (e.g., character limitations), the post and digital communication must provide hyperlinks to the full text of the communication and to appropriate cautionary statements in connection with any forward-looking statements and reference the cautionary language in the post;
- social media posts may not include any confidential information, trade secrets or other similar information;
- links included in Company posts or digital communications are considered part of the communication itself. If hyperlinks are included to third-party content, such posts and digital communications must include a notification that users are leaving the Company-controlled channels and that the Company is not responsible for and neither endorses nor approves such content (or provide an intermediary link page that includes such notification); and
- any Company responses to comments or other responses to such post, other than ordinary course responses regarding customer experiences, must be reviewed and approved by an Authorized Officer.

Language should be included on the Company website and communications to notify investors publicly that the Company intends to use its website and specific social media channels, if any, as channels of distribution of material information about the Company.

Market Surveillance Queries / Market Rumors

Any information relating to market rumors, leaks or false information relating to the Company must be brought to the attention of the Authorized Officers as soon as possible. The Authorized Officers will then take steps to ascertain as far as practicable the veracity of the leak or rumor and the degree that the leak or rumor exists in the marketplace. You must not directly respond to such market rumors, leaks or false information without the prior authorization of the CEO.

The Authorized Officers will assess whether it is appropriate for the Company to respond to the leak or rumor. If considered appropriate, the leak or rumor will be responded to by the Company through an announcement.

If the AMF or Nasdaq verbally queries the Company on a leak or rumor, only the Authorized Officers may respond to the AMF or Nasdaq. The Authorized Officers will consult on such query and decide on an appropriate response to such enquiries as soon as possible.

INSIDER LIST

The Compliance Officer will maintain an insider list in accordance with the applicable rules. The list will comprise persons employed or engaged by the Company, Board members, and third parties acting on behalf or for the account of the Company, who have access to inside information relating to the Company. The Compliance Officer may appoint other persons within the Company to administer the establishment of insider lists relating to employees within particular divisions or geographical locations.

Insider lists must include:

- the name of each person who has access to Inside Information (for third parties, the entities' names should be included in the insider list);

- the reason why such person is on the insider list;
- the date on which the person first had access to the Inside Information; and
- where a person no longer has access to Inside Information, the date on which this occurred.

The Company shall inform the persons named on the list of their inclusion on such list, their legal and regulatory duties in respect thereof, and the sanctions applicable to insider dealing and unlawful disclosure of inside information. Such persons must acknowledge receipt thereof.

AMENDMENT OF THIS POLICY

This Policy has been adopted by the Board of Directors of the Company. Amendments to it can only be approved by the Board of Directors.

The Compliance Officer is responsible for reviewing this policy to ensure compliance with the applicable laws and regulations as well as corporate governance best practices.

SANCTIONS

The AMF may, pursuant to article L.621-15-III of the French Monetary and Financial code, impose fines of up to **EUR 100,000,000** (one hundred million Euros) or **ten times the amount of any profit made**. This amount may be increased to up to 15% of the revenues of the Company. In addition to the Company itself, executive officers may be found liable (and therefore subject to the fines referred to above) in the event of failure to disclose inside information in a timely manner. Additionally, violations of US securities laws may result in SEC enforcement actions, which can result in civil monetary or criminal penalties.

Any person who communicates about the Company's business with analysts, existing investors, potential investors, shareholders, the media or the general public without the express approval of an Authorized Officer, or who otherwise discloses the Company's information in violation of this Policy, will be subject to disciplinary action, which may include termination of employment.