

# Invivyd's Code of Business Ethics and Conduct



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# Our Commitment to Each Other

## Introduction

At Invivyd, Inc. (“Invivyd”), ethics, integrity, honesty, and compliant conduct are principles that guide what we do on a daily basis, how we collaborate with each other, how we interact with our stakeholders, and, most importantly, how we execute on our commitment and devotion to protecting patients from serious viral infectious diseases. This Code of Business Ethics and Conduct (the “Code”) not only embodies these principles, but also sets forth Invivyd’s expectations for each employee, officer, director, and contractor/consultant (“Invivyd Colleagues”) when acting on behalf of Invivyd. The Code provides guidance to help Invivyd Colleagues comply with the laws, regulations, and industry codes that apply to our business, and it offers guidance and guiding principles to help you navigate the various situations you may face in your role at or with Invivyd. Invivyd Colleagues are expected to comply not only with the provisions, but also the spirit of this Code and Invivyd’s values.

Although the Code does not contemplate every scenario you may face, it is intended to give a baseline understanding of important topics that are premised on ethics and integrity and how to best navigate these areas. If you are in a situation where you are confronted with a difficult or challenging dilemma and are unsure what to do, consider these questions:

- Is the activity I am contemplating legal?
- Is it consistent with the spirit of this Code, Invivyd’s policies, and Invivyd’s values?
- Would my actions create a perception of impropriety?
- Would I feel comfortable if others in Invivyd knew that I took this action?
- Would I feel comfortable if my actions were made public, or appeared on social media?

Still unsure what to do? Always feel free to reach out to your manager or Invivyd Colleagues in Ethics & Compliance, Legal, or Human Resources. They are there to help you act in the best interests of our company and the patients whom we serve – you are never alone!

## Our Shared Commitment to Integrity

This Code applies to all Invivyd Colleagues. To help us avoid Code violations, all Invivyd Colleagues are expected to read, become familiar with, and comply with the ethical standards described and contained in this Code. We will all be required to affirm our agreement with – and commitment to – maintaining the highest standards of business ethics

and conduct by completing at least annual training on the contents and requirements of this Code.

All Invivyd Colleagues are critical to upholding the highest standards of business integrity, and we rely on each of you to uphold the Code while always keeping patient safety at the forefront of all we do. Invivyd carries the privilege of devoting its mission to protecting patients and, therefore, we take violations of this Code seriously. Those who do not follow it may face consequences, up to and including termination of employment with Invivyd, or, as applicable, termination of a contractual or other relationship with Invivyd. Some violations of law may also result in civil or criminal actions and liabilities for Invivyd and for the individuals involved.

Members of management have additional responsibility to foster and encourage our culture amongst their teams. Managers are expected to lead by example and role-model Invivyd's core values and this Code and set the right tone for ethical conduct by building trust and creating a supportive and fearless environment. Managers must maintain an open-door approach and invite the sharing of ideas, concerns, and questions. Additionally, managers are expected to follow the escalation procedures that Invivyd has put in place for handling and responding to reported concerns.

## Speaking Up & Non-Retaliation

### Your Voice Matters

It is everyone's responsibility to honor Invivyd's values and follow our policies - including by speaking up. If you suspect potential misconduct, promptly report it. We value, respect, and review all reports. Potential misconduct includes failing to follow laws, regulations, industry codes, or Invivyd's Code, policies, or procedures. If you see or suspect such misconduct, you must promptly report it. You can do so by telling your manager, Ethics & Compliance, Legal, or Human Resources. Any manager who obtains information about potential misconduct, as described herein, has the responsibility to report it promptly to Ethics & Compliance, with the expectation that all such reports reach the Ethics & Compliance team. If you prefer, you can also report confidentially and/or anonymously by contacting Invivyd's Ethics & Compliance Speak Up Line ("Invivyd's Speak Up Line") which is managed by a completely independent third-party. Invivyd's Speak Up Line is available 24 hours a day, 365 days a year, and may be reached several ways:

- Online via computer at [www.Invivyd.com/SpeakUp](http://www.Invivyd.com/SpeakUp)
- Online via mobile device at [www.invivyd.com/SpeakUpMobile](http://www.invivyd.com/SpeakUpMobile)

- Phone 1-833-818-6570

You may also contact Invivyd by mail as follows:

Invivyd, Inc.  
Attn: Chief Ethics & Compliance Officer  
209 Church Street  
New Haven, CT 06510

If you make a report, your concerns will be carefully reviewed and addressed according to our policies and procedures. Significant potential, suspected, or actual violations of law or regulations, and/or significant potential, suspected, or actual violations of Invivyd's policies and/or procedures, which we call Referable Compliance Concerns ("RCCs"), will be investigated by Ethics & Compliance, or its delegate. RCCs must be brought to Ethics & Compliance for appropriate handling. Matters reported that are not RCCs will be directed by Ethics & Compliance to the appropriate function for handling, as applicable.

It is the obligation of every person to whom this Code applies - whether they are the subject of an investigation, reporter of a violation, or someone who may have relevant information - to fully cooperate with an investigation. All Colleagues must be open, honest, and forthcoming with information. Failure to do so may result in disciplinary action, up to and including termination.

## Confidentiality and Non-Retaliation

For all matters, we will strive to ensure confidentiality of all those involved, including protecting the identities of Invivyd Colleagues who are part of an investigation. However, there may be a point where the identity of these individuals may become known or may have to be revealed to those involved in the investigation process, directly or indirectly, in order to fully investigate, address, and/or resolve the reported matter. In order to ensure confidentiality to the greatest extent possible, it is critical that Invivyd Colleagues who are involved in an investigation do not discuss the investigation, including any questions or answers, with others.

Invivyd has a strict non-retaliation policy and will not tolerate any retaliation against any Invivyd Colleague who, in good faith, asks questions, makes a report of actions that may be inconsistent with this Code, law, regulations, industry codes, or Invivyd policies or procedures, or who assists in an investigation of any suspected wrongdoing. Reporting "in good faith" means providing honest, complete, and accurate information, even if it later proves to be unsubstantiated or a mistake. Acts of potential retaliation should be reported

immediately to your manager, to another member of management, to Human Resources, Ethics & Compliance, or Legal, or through the Invivyd Speak Up Line.

## Complying With Laws & Standards

### Our Commitment to Legal and Ethical Compliance

As a biotechnology company devoted to delivering protection from serious viral infectious diseases, Invivyd operates within one of the most heavily regulated industries in the world. We take this responsibility seriously and are committed to upholding all applicable laws, regulations, professional standards, and industry codes of conduct governing our business. This includes, but is not limited to, federal and state anti-kickback laws, fraud and abuse laws, privacy, PhRMA Code, and transparency requirements. We also adhere to the standards and guidelines established by relevant regulatory and industry bodies that oversee the development, manufacture, and promotion of life science innovations.

Because our mission is focused on protecting patients, compliance is fundamental to who we are and how we operate. We each have a responsibility to understand and follow these requirements, to ask questions if we are unsure, and to uphold Invivyd's unwavering commitment to legal and ethical behavior in every interaction. Our adherence to these expectations ensures we maintain integrity in our work, meet the obligations of our industry, and continue to operate in a way that protects patients, upholds the law, and strengthens Invivyd's reputation for doing what is right.

### Preventing Bribery, Corruption, and Kickbacks

We are committed to maintaining the highest standards of ethical business conduct. Bribery and corruption are strictly prohibited, and we hold our employees accountable for adhering to these expectations and expect the same from our business partners.

Invivyd Colleagues must never offer, promise, authorize, or provide any payment, gift, benefit, or thing of value intended to improperly influence a government official, healthcare professional, or any other individual or commercial entity. We must avoid actions that could even suggest improper influence and never try to do anything through a third party that would be a violation of law, regulation, code or policy to do ourselves.

We also abide by all applicable transparency and anti-kickback laws, regulations, codes and policies to maintain ethical and compliant operations. Invivyd prohibits Colleagues and anyone acting on behalf of the Company from offering anything of value (whether in cash or in kind) that is intended to influence an individual's decision to recommend, prescribe,

endorse or purchase a healthcare product or service that is reimbursed by a federal healthcare program, such as Medicare and Medicaid.

## Fair Competition

Invivyd is committed to full, free, and fair competition, and dedicated to complying with federal, state, and international antitrust laws that are intended to promote and protect competition. Full, free, and fair competition benefits consumers as it can lead to lower prices, higher quality, and increased output of goods and services. Invivyd is committed to avoiding illegal or unethical business practices and, further, will not engage in price fixing and related behavior, restrict trade, exclude competitors from our fields of interest, work with competitors to divide markets, or engage in any other type of anti-competitive behavior.

Additionally, any information gathered about our competitors will only be done in an ethical and honest manner. Invivyd will not use, and will not ask any third party or vendor to use, unlawful or unethical means such as misrepresentation, deception, theft, spying, or bribery to gather competitive intelligence or information. In addition, we will not gather information known to be protected by trade secret laws or non-disclosure or confidentiality agreements.

## Insider Trading Prevention

Invivyd's policy prohibits insider trading, i.e., the purchase or sale of a company's securities by anyone who is aware of material non-public information about that company. Material non-public information, also sometimes called inside information, refers to material facts about a publicly traded company that have not yet been disclosed to the general public through a press release or other filing with the U.S. Securities and Exchange Commission, which could give an unfair advantage to its possessors if acted upon, and would affect a reasonable person's decision to buy, hold, or sell securities of such company. Inside information is knowledge and information on the operations, products, pipeline, services, financial position, etc., of a company that is not accessible to the public. Federal and state securities laws prohibit the purchase or sale of a company's securities by anyone who is aware of inside information about that company, and these laws also prohibit anyone who is aware of inside information from disclosing this information to others who may trade.

# Doing Business with Integrity

## Interactions With Healthcare Professionals

As part of Invivyd's commitment to improving patient health through the development of innovative therapies, we are dedicated to engaging healthcare professionals ("HCPs") in a way that is honest, scientifically accurate, and compliant with legal and regulatory requirements. When we share information about Invivyd's commercial products, it must be accurate, truthful, balanced, non-misleading, grounded in scientific data and evidence, and aligned with authorized or approved uses.

Additionally, any services we seek from HCPs must address a genuine business need and be conducted ethically, transparently, and in accordance with laws, industry code, and Invivyd's internal policies, procedures, and training requirements.

Every Invivyd Colleague is responsible for ensuring that interactions with HCPs and other customers meet a legitimate purpose and never compromise - or appear to compromise - an HCP's independent medical judgment. We must not offer or provide anything of value that could improperly influence decisions about prescribing, recommending, or otherwise using Invivyd products.

Invivyd engages with HCPs and customers across a variety of activities, including scientific research, educational programs, market access discussions, and promotional communications. Through all these interactions, Invivyd Colleagues shall uphold the highest ethical standards and operate with integrity and transparency.

### **Our Standards for Ethical Engagement**

- We remain mindful of how our interactions may be perceived and avoid any conduct that could be considered deceptive, unfair, or unlawful, including false or misleading advertising, bribery, or other improper inducements.
- We conduct all marketing and promotional efforts responsibly, ensuring that labeling, educational initiatives, and commercial communications are consistent with laws and regulations.
- We provide timely and accurate data on product use, safety, and effectiveness to regulatory authorities.
- We recognize that relationships with HCPs may create real or perceived conflicts of interest and, therefore, promote trust and transparency by disclosing product price disclosures and transfers of value in compliance with federal and state laws and regulations.

By consistently applying these standards, we help ensure that Invivyd's interactions with HCPs and customers remain ethical, compliant, and grounded in our commitment to patient well-being and responsible innovation.

## Business Partners and Suppliers

Across our operations, we rely on third-party suppliers, distributors, and business partners to help us advance our strategic priorities. Such relationships, however, carry inherent compliance, financial, safety, and information security risks that may expose the company to operational, regulatory, or reputational consequences. Conducting due diligence and maintaining robust oversight of third parties are fundamental to our business practices. Invivyd requires its partners to uphold stringent standards and to comply fully with all applicable laws and internal policies, as applicable, related to the activities they perform on our behalf.

## Conflicts of Interest

Our business decisions should be governed by good judgment and not by our personal interests. We seek to avoid situations that present conflicts between our personal interests and those of Invivyd. We understand that even the appearance of a conflict of interest can damage the Company's reputation and our own.

Invivyd Colleagues should avoid activities or situations that create – or even give the appearance of creating – a conflict of interest. A conflict of interest can occur whenever you have a competing interest that may interfere with or inappropriately influence the performance of your duties, responsibilities, commitments to, or ability to make an objective decision on behalf of Invivyd. Each of us is expected to use good and ethical judgment to avoid such activities or situations. Conflicts of interest can undermine the trust others place in us and damage both our professional reputation and that of Invivyd. Conflicts of interest may be actual, potential, or even just a matter of perception. Since these situations are not always clear-cut, please fully disclose them so that Invivyd can properly evaluate and help avoid such a situation.

Additionally, actions by family members of Invivyd Colleagues – which include spouses, domestic partners, children, parents, siblings, and persons sharing the same home whether or not legal relatives – also may potentially result in a conflict of interest to the extent that their actions in any way involve or impact Invivyd business.

## Gifts

Gifts, entertainment, and hospitality (“Gifts”) are often offered with good intentions and, in a personal setting, can help strengthen connections. However, in a corporate setting, they can introduce legal and ethical risks, including concerns under anti-kickback and anti-corruption laws, or create the appearance of a conflict of interest or undue influence. Invivyd Colleagues only offer and accept Gifts in compliance with applicable laws, codes, and Invivyd policies. Gifts must never be given or received in consideration or expectation of any action by the recipient, and care should be taken to avoid even the perception of a corrupt intention in receiving or giving a gift. Gifts must never be in the form of cash or cash equivalents.

Gifts and other transfers of value may never be provided to or received from a potential vendor, consultant, or strategic partner that would inappropriately influence the decisions or business judgment of Invivyd or of that customer, distributor, or strategic partner. Business hospitality should be in accordance with applicable policy and infrequent, modest, and intended to serve legitimate business goals.

Providing entertainment to healthcare professionals is never acceptable.

## Patients, Science & Quality

### Interactions With Patients and Patient Advocacy Groups

Interactions and engagements with patients and Patient Advocacy Groups (“PAGs”) play an essential role in advancing Invivyd’s mission. Their experience, perspectives, and collaboration help shape our research and clinical activities, inform disease-awareness initiatives, and support innovation that addresses patient challenges. All interactions with patients and PAGs must comply with applicable laws, regulations, and industry codes. Because we value the trust placed in us, every interaction must reflect independence, transparency, and mutual respect, and demonstrate genuine consideration for the interests, mission, and autonomy of the patient or PAG involved.

Definition: Patient Advocacy Groups are generally independent, not-for-profit organizations that represent the needs of individuals living with medical conditions, as well as their families and caregivers.

### **Considerations for Interacting with Patients and PAGs**

- Engagement must serve a legitimate and clearly defined purpose.

- Review and follow all policies, as well as applicable laws, regulations, and industry codes that govern patient and PAG interactions.
- Respect the independence and autonomy of patients and PAGs at all times.
- Avoid any conduct that could be perceived as influencing or compromising their independence.
- Only appropriate Invivyd Colleagues whose roles have been approved for patient interactions may engage with them, and Invivyd Colleagues may never provide medical advice to a patient in their capacity as an Invivyd Colleague.

## Research and Development

Invivyd's mission is grounded in delivering protection from serious viral infectious diseases. A critical part of this is safeguarding the individuals who participate in our clinical trials and ensuring that every aspect of our research and development is conducted with the highest ethical, scientific, and medical standards. Each of us shares responsibility for upholding Invivyd's expectations for integrity, quality, and excellence throughout the research and development lifecycle.

### **Standards We Follow in Research and Development**

- We prioritize the rights, safety, and well-being of every research participant, recognizing that their trust is essential to advancing our work.
- We conduct all research and development activities in strict accordance with applicable laws, regulations, and recognized ethical standards, including those governing Good Laboratory Practices and Good Clinical Practices.
- We are committed to ensuring that the data generated from Invivyd-sponsored studies are accurate, reliable, and complete, forming a sound foundation for regulatory submissions and scientific decision-making.

## Manufacturing and Supply Quality

We are committed to ensuring that our products are manufactured and supplied to high standards of quality, safety, and efficacy, assured through deployment of our robust quality management systems and our focus on the integrity of our data.

We require that suppliers and partners operate in compliance with applicable laws and regulatory requirements, including Good Clinical Practices and Good Manufacturing Practices, and we conduct audits and oversight of our supply chain to ensure the quality, safety, and efficacy of our products.

## Data Integrity

As a science-driven organization, Invivyd relies on the integrity of its data to ensure the quality and credibility of the products we develop and commercialize. Accurate, complete, and trustworthy data underpin the confidence that regulators, patients, and customers place in our products, our processes, and our commitment to safety and effectiveness. Protecting the reliability of our data is essential to safeguarding the people and communities we serve.

## Safety Reporting

We are dedicated to ensuring that all Invivyd products meet the highest standards of safety. Every one of us plays an important role in upholding this commitment by promptly reporting any product safety and product quality concerns – regardless of how we become aware of them. If you learn of an adverse event, product quality complaint, or any other issue involving an Invivyd product, you must report it within 3 calendar days of receiving the information. Timely reporting helps protect patients, ensure regulatory compliance, and maintain the integrity of our products and processes.

## Privacy, Information & Technology

### Confidential Information

Invivyd has multiple types of information that are confidential in nature and must be carefully safeguarded. Protecting this information is essential to our business. Confidential information should never be disclosed to outsiders without specific approval by Invivyd. Confidential information includes without limitation:

- Information marked “Confidential,” “Private,” “For Internal Use Only,” or other similar legends or notations
- Technical or scientific information relating to current and future products, product candidates, or research and development
- Regulatory submissions, timelines, and the status of such submissions
- Commercial performance, pricing information relating to our products, and customer lists
- Business or marketing plans or projections, including business development information
- Company initiatives (existing, planned, proposed, or developing)
- Internal financial data and company earnings

- Intellectual property (“IP”), which is a type of confidential information that is a critical asset created and owned by Invivyd. As such, it may not be used for personal gain. Examples of our IP include, but are not limited to:
  - Patents, trademarks, and copyrights
  - Trade secrets and discoveries
  - Methods, know-how, and techniques
  - Innovations and designs
  - Systems, software, and technology

Invivyd employees are prohibited from forwarding any Invivyd confidential or proprietary information to personal email accounts or similar services. All confidential information must be accessed, shared, and stored exclusively through approved Invivyd systems and company issued email accounts. The use of personal email, cloud storage platforms, or personal messaging applications for company information is not permitted. Individuals who require remote access or external collaboration tools should contact IT to obtain approved, secure solutions that meet business needs while maintaining compliance with Invivyd’s security standards.

## Privacy

Data about people – whether employees, patients, healthcare professionals, customers, business partners, or other stakeholders – are essential for Invivyd to fulfill its mission and operate its business. Personal data include any information that directly or indirectly identifies an individual, such as a name, contact details, or health related or genetic information. We are committed to safeguarding personal data we receive in connection with our research, pharmacovigilance activities, and other business operations, and protecting and using such information in accordance with Invivyd policies, procedures, and all applicable laws and regulations, including but not limited to various state and federal laws.

Invivyd is committed to the management of health information in a confidential manner. In the course of the development and commercialization of new medicines, and in providing health benefits to its employees, Invivyd may acquire or maintain certain information about medical conditions, histories, or treatments. We are expected to maintain the confidentiality and integrity of such information at all times.

Any concerns regarding inappropriate access, use, or disclosure of personal data must be reported promptly to Invivyd’s Chief Privacy Officer.

## Safeguarding Company Assets and Intellectual Property

We each share responsibility for protecting Invivyd's assets and ensuring they are used in ways that reflect our core values. These assets – whether technological, informational, physical, financial, or intellectual property – are essential to Invivyd's success and must be managed with care. Company assets include, but are not limited to, our products, facilities, equipment, hardware, software, information systems, devices, data, records, and all forms of intellectual property.

Invivyd property, such as office and lab supplies, computer equipment, and facilities, are to be used only for legitimate business purposes, although incidental and minimal personal use may be permitted. Colleagues shall not use the Invivyd name, any brand name or trademark owned or associated with Invivyd, or Invivyd letterhead stationery for any personal purpose. Finally, personal use of Invivyd funds or property, including charging personal expenses as business expenses, is a breach of this Code.

It is also important to note and understand that any information you use, create, share, send, receive, download, and/or store on Invivyd's systems or technology (including, without limitation, email, instant messaging, voicemail, and the internet) are business records owned by Invivyd. Additionally, emails and texts sent on personal devices for work purposes may also be considered business records. Colleagues may never use our systems or equipment to view, access, store, share, or send content that is illegal or otherwise obscene, racist, threatening, intimidating, or sexually explicit. Invivyd has the right to monitor, review and access such records and may do so without notifying you, to the extent permitted by law.

## Social Media

Social media enables us to highlight Invivyd's commitment to innovation, patient care, and our employees. With this opportunity comes responsibility, and Invivyd Colleagues are accountable for responsible use of social media platforms, whether posting personally or, when authorized, representing Invivyd.

If you choose to engage in social media, you must not – unless expressly authorized to do so by Invivyd – make statements or claims about Invivyd products, whether those products are investigational or approved. You must not give the impression that you are speaking on behalf of Invivyd in public communications, including, without limitation, posts to online forums, social media sites, blogs, chat rooms, bulletin boards, etc. Additionally, Invivyd Colleagues must never share material non-public information or any confidential or proprietary information through any social media platform.

Invivyd Colleagues are welcome to post about Invivyd celebrations, volunteer events, and milestone achievements, to name a few.

## Artificial Intelligence

Invivyd recognizes that artificial intelligence (“AI”) has become an increasingly important tool for generating data-driven insights that help us advance our mission more effectively and efficiently. Artificial Intelligence refers to machine-based technologies that can analyze inputs and generate outputs – such as recommendations, predictions, decisions, or new content – by identifying patterns or inferring relationships within the data they process.

As we incorporate AI into our work, we do so thoughtfully and responsibly, ensuring that every use aligns with our values and ethical commitments.

We prioritize meaningful human oversight in all AI enabled activities and are dedicated to adopting AI systems that are safe, reliable, secure, and designed to support – not replace – human judgment. We carefully evaluate potential risks before developing, acquiring, or using AI technologies and implement appropriate measures to reduce or mitigate those risks. We also protect sensitive information and honor the privacy and transparency expectations of patients and all individuals whose data may be used within AI systems.

## Company Records & Disclosures

### Promoting Financial Integrity and Accurate Business Records

Accurate and complete business records are fundamental to Invivyd’s operations and to maintaining the confidence of our investors and stakeholders. To support this commitment, we adhere to strong internal controls and accounting policies designed to ensure the integrity, completeness, and reliability of all Invivyd financial records and publicly filed financial statements.

Each of us is responsible for exercising sound financial judgment and ensuring that our business records are correct and accurately reflect our work – from time sheets and invoices, to expense reports and benefits records. Each of us is responsible for ensuring that the company records we create or approve are complete, accurate, and reliable, and we all must watch for any suspicious, incomplete, or inaccurate transactions, invoices, or payments made by or on behalf of Invivyd. By doing so, we help ensure that Invivyd is able to provide full, accurate, and timely financial and other disclosures to regulators, governments, and the public.

Invivyd is committed to ensuring proper and effective internal controls over our financial reporting. To this end, Invivyd will provide accurate and timely information about our business and will further:

- Comply with generally accepted accounting principles.
- Maintain a system of internal accounting and disclosure controls and procedures that provide management with reasonable assurances that transactions are properly recorded, and that material information is made known to management.
- Maintain books and records that accurately and fairly reflect transactions.
- Prohibit establishment of material undisclosed or unrecorded funds or assets.

## Public Disclosures

It is Invivyd's policy to provide information in a manner that is full, fair, consistent, accurate, understandable, and timely when making disclosures of company information to the public, whether about our business, clinical studies, financial condition, or other public communications, including in filings with the U.S. Securities and Exchange Commission ("SEC"). To this end, employees may be called upon to provide necessary information to assure that the company's filings and public communications meet these standards, and appropriate Invivyd personnel will approve press releases, SEC filings, publications, or other official company disclosures in advance. Further, only specific company spokespersons are designated to respond to questions from the public and are authorized to release information to the public on behalf of Invivyd when appropriate. All media inquiries or inquiries from others seeking information about Invivyd must be forwarded to the team managing Invivyd's company communications.

## People, Workplace & Inclusion

### Equal Employment Opportunity and Freedom from Discrimination

Invivyd is committed to compliance with all applicable employment laws, including providing equal employment opportunities when evaluating potential new hires. We base hiring, promotions, and performance management decisions solely on qualifications and job performance. Invivyd firmly prohibits discrimination in all employment related decisions based upon an employee's or applicant's race, color, religion, sex (including sexual orientation, gender identity, and pregnancy), national origin, age, disability, genetic information, citizenship status, veteran status, and other characteristics or category protected by law. Employees may not engage in acts that cause, or could cause, unlawful

employment discrimination. Invivyd is also committed to accommodating qualified disabled employees and applicants consistent with applicable laws.

## Respectful Interactions and Prevention of Harassment

Colleagues should treat one another with respect at all times. Colleagues are expected to communicate in a professional and constructive fashion and in a manner consistent with Invivyd's values and this Code. Actions or communications intended to insult or demean are not appropriate.

Invivyd prohibits harassment in the workplace on the basis of any category protected by law, and Invivyd does not tolerate harassment by any Invivyd Colleague. Harassment includes verbal or physical conduct that threatens, offends, disrupts another's work performance, creates an intimidating, offensive, abusive, or hostile work environment, or belittles any individual because of their, race, color, religion, sex (including pregnancy, sexual orientation, gender identity), national origin, age, disability, genetic information, citizenship status, veteran status, or any other characteristic or category protected by law.

Sexual harassment is another type of harassment. Invivyd has a zero tolerance policy for sexual harassment. In general, sexual harassment occurs when, among other things, actions that are unwelcome are made a condition of employment or used as the basis for employment decisions. Examples of sexual harassment include requesting a sexual favor, unwelcome sexual remarks, gestures, or physical contact, or displaying sexually explicit or offensive pictures or materials. A hostile work environment can result from such behaviors.

## Workplace Safety

The safety and security of Invivyd's employees and contractors is imperative. Invivyd will not tolerate violence or threats of violence in the workplace, whether virtually or in person. Additionally, Invivyd will not tolerate intimidating, threatening, bullying, taunting, or hostile behavior, whether virtually or in person, or any other conduct that causes physical injury or violence in the workplace. Subject to applicable laws, Invivyd prohibits possession of any dangerous weapons on its premises or at any Invivyd-related event, including firearms, weapons accessories, explosives, or other dangerous weapons or substances.

The use of illegal drugs and the misuse of alcohol and other substances, including over-the-counter or prescription drugs, is prohibited in the workplace. The workplace is anywhere Invivyd Colleagues are conducting business, regardless of time or location.

Invivyd Colleagues working in Invivyd facilities are expected to conduct their work in a safe manner in compliance with all Invivyd policies and must promptly report all safety or health concerns to their manager or Human Resources.

## Environmental Matters

Invivyd is committed to operating in a manner that respects and protects the environment in compliance with all applicable federal and state environmental laws and regulations and Invivyd policies.

## Code Administration

### Waivers and Amendments

While most provisions contained in this Code must be strictly adhered to without exception, in certain circumstances, an exception may be appropriate. There shall be no waiver of this Code for executive officers or directors except with the approval of our Board of Directors. There shall be no waiver of this Code for any other Invivyd Colleague except with the approval of Invivyd's Chief Legal Officer. An approved waiver of this Code must be disclosed in accordance with applicable laws, rules, and regulations.

Any substantive amendments to this Code must be approved by Invivyd's Board of Directors, and must be disclosed as required by applicable laws, rules, and regulations.

March 2026