

## International Trade Controls Policy

### Objective and Purpose

Genmab has a well-established reputation for conducting business in an ethical, transparent and compliant way. This reputation is built on Genmab's commitment to integrity, a core Genmab value reflected throughout Genmab's Code of Conduct, approved and adopted by the Genmab Board of Directors (2021). Further, our Genmab Code of Conduct specifies that we take seriously our responsibility to assure that our products and services move across borders in full compliance with applicable trade and other regulations.

The objective of this international trade controls policy (the "Policy") is to ensure that all business activities of Genmab A/S including its subsidiaries and associated companies (collectively "Genmab") comply with

- (i) international economic or financial sanctions ("International Sanctions"), which prohibit or regulate business conduct towards specific countries, regions, entities and individuals, and
- (ii) international export controls ("International Export Controls"), which prohibit or regulate the export of certain items to certain countries or end-users.

Non-compliance with International Sanctions and International Export Controls may expose Genmab, its employees and others associated with Genmab to civil, regulatory and criminal penalties, including substantial fines, losses and reputational risk and may have significant adverse effects on business relationships.

If a Genmab employee or associated person has any concerns as to this Policy, or perceives any conflict or inconsistency between this Policy and governing laws or any other Genmab policy, rules or procedures, the concern should be promptly raised with and direction sought from Genmab Legal.

### Who must comply with this Policy?

This Policy applies to all employees, officers, directors of Genmab, management, and contingent staff regardless of work location and to such other persons as designated by Genmab from time to time (each a "Genmab Person").

This Policy also applies to anyone performing services for or on behalf of Genmab.

It is the responsibility of each and every Genmab Person, as relevant, to assure proper implementation of this Policy within their respective area(s) of functional responsibility, to lead by good example, and to provide guidance to their staff and reports as needed in order to enable them to assure their own compliance with this Policy.

We expect that you:

- are familiar and comply with the requirements imposed by this Policy; and
- report any breach or suspected potential breach of this Policy or related laws and regulations immediately to Genmab Legal on [legal@genmab.com](mailto:legal@genmab.com) or report the matter to Genmab through the **Speak Up Compliance Hotline as below:**
  - 24/7 – Online or by Phone
  - [GenmabSpeakUp.ethicspoint.com](https://genmab.com/speakup/ethicspoint.com)
  - Denmark: 80-83-01-69
  - Netherlands: 0800-020-1556
  - United States: 1-844-942-3289
  - Japan: 0800-123-0136

## What are International Sanctions

International Sanctions are laws and regulations enacted by governments (e.g. the United States), international organizations (e.g. the United Nations) and supranational bodies (e.g. the European Union) to promote foreign policy and other objectives, such as the support of peace efforts, freedom, democracy, the rule of law and human rights. International Sanctions are mainly implemented by prohibiting companies and individuals from doing business with specific individuals, legal entities, countries, regions and governments, which have been involved in human rights violations, corruption, terrorism and other types of criminal activities.

Examples of International Sanctions include, but are not limited to, prohibitions or restrictions on the following:

- Transactions, including payments and money transfers, with/to and/or in specific countries, entities, individuals and banks, and
- Transactions related to certain countries.

## What are International Export Controls

International Export Controls are laws and regulations enacted by governments, international organizations and supranational bodies to ensure international peace, security and stability by controlling exports of certain items to critical countries and end-users of concern with respect to public security, including the prevention of acts of terrorism and human rights violations.

Examples of International Export Controls include, but are not limited to, prohibitions or restrictions on the following:

- supply, sale, transfer or export of certain sensitive products (e.g. explosives, missile and nuclear technology), equipment and services either directly or via a third party/country, and
- supply, sale, transfer or export of dual-use technology, i.e., technology that both has a commercial and military use.

## RESTRICTIONS

### International Sanctions - Restricted countries and regions

Under this Policy it is prohibited for Genmab to engage, directly or indirectly, in any activities or business with state entities (governments), individuals, legal entities or groups in the following countries and regions without the prior written approval of Genmab Legal (provided this is not contrary to mandatory law):

- Cuba
- Iran
- North Korea
- Syria
- Venezuela
- Russia
- Donetsk region
- Luhansk region
- Crimea region
- Belarus

International Sanctions may also prohibit dealings with individuals, groups or entities in other countries or regions in addition to those listed above. The most relevant countries and regions subject to International Sanctions may be found here:

<https://www.sanctionsmap.eu/#/main>

[https://www.treasury.gov/resource-center/sanctions/Programs/Pages/faq\\_10\\_page.aspx](https://www.treasury.gov/resource-center/sanctions/Programs/Pages/faq_10_page.aspx)

#### International Sanctions - Sanctioned individuals, entities or groups

Trading with individuals, entities or groups listed on sanctions lists is strictly prohibited under this Policy. The most relevant individuals, entities and groups subject to International Sanctions may be found here:

<https://webgate.ec.europa.eu/fsd/fsf>

<https://www.un.org/securitycouncil/content/un-sc-consolidated-list>

<https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>

<https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/consolidated.aspx>

#### International Export Controls - Exportation of materials and products

International Export Controls generally prohibit the export of certain items to critical countries and end-users. Genmab does not trade with the military. To the extent required, Genmab Legal will conduct the relevant export control analysis of Genmab products on an ongoing basis to ensure that Genmab remains compliant with International Export Controls. If a supplier informs any Genmab Person that items provided by the supplier to Genmab are subject to export controls or is a dual-use item, Genmab Legal must be informed immediately.

If the material or product contains a substance that could be used for military or terrorist purposes, then it could be considered as a "dual use" product hence covered by International Export Controls. Please seek further advice from Genmab Legal if you have any concerns relating to dual use.

## How To Comply

Genmab must always comply with applicable International Sanctions and International Export Controls, including but not limited to U.S. and EU sanctions and export controls (provided this is not contrary to mandatory law).

Everyone covered to this Policy as described in Section 0 above, must conduct their activities in full compliance with the Policy and all applicable International Sanctions and International Export Controls. Therefore, it is of the utmost importance to carry out relevant prior screening of relevant activities and business partners and to be alert to any issues that may be contrary to International Sanctions and/or International Export Controls.

### We expect that you:

- ensure that relevant activities and business partners are subject to a due diligence screening by Genmab Procurement;
- refrain from funding, receiving and/or transferring funds or making available anything of value in, to or for the benefit of countries/regions/individuals/groups/entities subject to sanctions;
- refrain from cooperating, or in any way engaging in business activities of any kind with countries/regions/individuals/groups/entities subject to sanctions; and
- refrain from supplying or buying products or services to/from sanctioned countries, regions/individuals/groups/entities unless specifically authorised by Genmab Legal.

## How do I ensure that distributors and licensees comply?

As part of Genmab's commitment to conduct business in an ethical, transparent and compliant way, it is essential that Genmab's third party collaborators also comply with International Sanctions and International Export Controls.

### We expect that you:

- ensure that distributors and other in scope third parties are subject to a due diligence screening by Genmab Procurement;
- ensure that third parties do not transfer funds or make available anything of value in, to or for the benefit of countries/regions/individuals/groups/entities subject to sanctions, on behalf of Genmab; and
- with support from Genmab Legal ensure to include relevant contract provisions that prevent the distributor or other in scope third parties from selling outside the agreed territory, to sanctioned customers or embargoed countries.

## Non-compliance

Failure by a Genmab Person to comply with his or her obligations under this Policy, may be considered as misconduct and may lead to the institution of a disciplinary sanction, including in case of serious misconduct up to termination of employment.

## Policy Governance

The periodic review period for this Policy will be every year or if new developments or regulations require an updated.

## Training

Genmab provides training on International Sanctions and International Export controls and application of this Policy to all relevant Genmab Persons on a regular basis.

Genmab Legal shall determine the content of the training and shall ensure that all relevant Genmab Persons complete the training and shall keep adequate and up to date training records on file.

## Who should I contact for further guidance?

Any questions regarding the applicability of this Policy to a particular activity should be directed to Genmab Legal ([legal@genmab.com](mailto:legal@genmab.com)).

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