Decoding Biology To Radically Improve Lives
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INTRODUCTION

At Recursion, our mission is to decode biology to radically improve lives. We are a clinical pharmatech company building the world’s largest proprietary biological and chemical data atlas and applying machine learning to distill trillions of searchable relationships across biology and chemistry, unconstrained by human bias.

We are industrializing drug discovery and development.

Achieving our important mission is reliant on the values that are core to our culture. Our behaviors and decisions are shaped by these core beliefs and principles, helping us to do the right thing and act with integrity in everything we do.

We choose the Third Parties we work with through the lens of our values to ensure that these principles are emulated not only in the work we do, but in the work carried out on our behalf.

When we work as one through our values, only then can our mission of improving lives be realized.
We care about our drug candidates, our Recursionauts, their families, each other, the communities in which we live and work, and we care deeply about the patients we aim to serve and their loved ones. We also care about our work; we operate with an owner’s mindset. We care so much that we are willing to do and say the hard things to make each other and the company better.

Learning from the diverse expertise and perspectives of our fellow Recursionauts, and from failure, is an essential part of how we make progress. We seek to create cross-functional teams so that we can teach and learn about the myriad ways to approach the problems we tackle. We expect everyone to be learning at the rate of growth of the company. We have never been static, nor should we be.

We are unapologetic that our expectations for delivery are extraordinarily high. We have the potential to radically improve the lives of millions of people, and we do not want any of them to wait a day longer than is necessary. There is urgency to our existence. The deep caring for our people is an enabler for them to rise to these expectations.

No company changes the world or reinvents an industry without being bold. Part of being bold is creating a culture where failure is embraced if it leads to learning & growth. We dare greatly, rather than celebrate the more moderate successes that could be within our reach if we relaxed our ambition. Boldness, however, must be balanced; not by timidity, but by acting with integrity & doing the right thing even when no one is looking. We lead with data, optimize relationships for the long-term, & aim for the highest levels of integrity in everything we do.

We operate with a ‘company first, functions second’ mentality. We do what is best for the mission, regardless of whether it is the optimal outcome for ourselves or our functional team. Our success comes from working as one interdisciplinary team.
We expect our Third-Party partners to implement controls to prevent bribery and corruption. Bribery involves exchanging something of value to obtain unfair business advantages. Corruption is the abuse of power for personal gain. Both activities are unethical, illegal, and not in line with Recursion’s values. Specific behaviors required of all Third-Party partners include:

- Ensure your workforce is educated on bribery, corruption and the global laws which prohibit these activities. This should include those you hire to help you deliver services to Recursion.
- Never give, receive, ask for, promise to or agree to accept a bribe, nor authorize someone else to do so on your behalf.
- Adequately vet those you hire and contract to carry out services for Recursion for potential red flags that could indicate a potential to engage in bribery or corruption. For contracted parties, implement mechanisms to periodically monitor their antibribery and anticorruption compliance programs.
- Keep complete, detailed and accurate records of all financial transactions associated with your work for Recursion. We may ask to review these records periodically.
- Only payments, hospitality, contributions and other items of value specified in your contract with Recursion may be given in the course of carrying out your work for us. Cash, cash equivalents, gifts, political contributions, and facilitation payments are always prohibited.

**ECONOMIC & TRADE SANCTIONS**

Third-Party partners must comply with all applicable import and export controls, sanctions, embargoes, and other trade compliance laws in the countries where transactions and work you perform for Recursion occurs.

**CONFLICTS OF INTEREST**

Recursion’s employees have a responsibility to act in Recursion’s best interests. We expect our Third-Party partners to avoid actions that would improperly influence our employees' objectivity and decisions. Additionally, you are expected to disclose personal relationships with Recursion employees, including relationships with friends or relatives and any other types of conflicts of interest.

**ANIMAL WELFARE**

Animals should be treated with care, including the minimization of pain and stress. Animal testing should be performed after consideration to replace animals, reduce the numbers of animals used or refine procedures to minimize distress. Alternatives should be used whenever scientifically valid and acceptable to regulators.

**CONFIDENTIALITY**

Third-Party partners must protect Recursion confidential information as if it were their own and ensure any communication of confidential information is authorized, limited to those who need to know, and confidentiality agreements have been executed as necessary. Confidential information includes, but is not limited to intellectual property of Recursion, strategic information, and stock market sensitive data. You should not speak about Recursion to the media or in any public forum without our consent.
RAISING CONCERNS

Recursion cares deeply about appropriate treatment of individuals and expects you to share the same deep commitments. We expect you to maintain a workplace free from discrimination or harassment (including sexual harassment) because of any category or status protected under applicable law. Further, Third-Party partners must never engage in slavery, human trafficking, or child labor.

Diversity and inclusion of different cultures and backgrounds is core to Recursion’s values and success. We expect our Third-Party partners to be inclusive in the selection of their workforce force, suppliers, and service providers.

DATA PRIVACY AND SECURITY

You must comply with relevant data privacy and security laws (i.e., EU GDPR, HIPAA, etc.), protect personal data and honor the rights of data subjects. This includes applying effective technological and physical security measures to ensure the confidentiality, integrity, and availability of personal data, appointing an individual to be accountable for data privacy and security, and providing training to employees who may access Recursion personal data on the proper handling and protection of the data. The privacy and security practices of any parties you contract to perform services to or on behalf of Recursion must be thoroughly reviewed to ensure adequacy.

HUMAN RIGHTS AND LABOR

Recursion cares deeply about appropriate treatment of individuals and expects you to share the same deep commitments. We expect you to maintain a workplace free from discrimination or harassment (including sexual harassment) because of any category or status protected under applicable law. Further, Third-Party partners must never engage in slavery, human trafficking, or child labor.

Diversity and inclusion of different cultures and backgrounds is core to Recursion’s values and success. We expect our Third-Party partners to be inclusive in the selection of their workforce force, suppliers, and service providers.

Third-Party partners are expected to pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. You should clearly communicate with workers: (i) the basis on which they are compensated; and (ii) whether overtime may be required and the wages to be paid for such overtime.

RAISING CONCERNS

Recursion’s culture embraces saying the hard things, including speaking up without fear of retaliation, intimidation or harassment when issues or concerns arise.

We expect you to encourage your workforce to bring any concerns, deviations from this Code, or potential violations of law to our attention as soon as possible. We fully investigate all reports and expect our Third-Party partners’ cooperation in gathering information and implementing remedial measures.

You and your workforce can report issues or concerns via Recursion’s Integrity Hotline by calling 844-987-0408 in the U.S. or Canada or via web portal: www.recursionpharma.ethicspoint.com.

Toll-free numbers for other countries are located in the web portal. The Integrity Hotline is managed by an independent third party and is available to you 24 hours a day, 7 days a week.
ETHICS

SUSTAINABLE SOURCING AND TRACEABILITY

Source all materials responsibly and ethically, conducting due diligence on the sources of critical raw materials to promote legal and sustainable sourcing.

Determine whether your supply chain for any products we manufacture or contract to manufacture includes conflict minerals (including tantalum, tin, tungsten and gold).

CLINICAL TRIALS

Third-Party partners involved in clinical trials on behalf of Recursion will ensure compliance with all applicable regulatory requirements in the countries where clinical trials are conducted.

Partners must respect and adhere to relevant guidance on Good Clinical Practice (GCP) issued by national and local regulatory authorities.

COOPERATING WITH GOVERNMENT AGENCIES

Third-Party partners will cooperate with investigating government agencies charged with enforcing compliance as and to the extent required by local laws (including, where permitted, by providing reasonable access to facilities and workers).

When required, partners will notify the relevant authority if they receive credible information that a worker, contractor or subcontractor has violated local laws.

PRE-EMPLOYMENT SCREENING

Third-Party partners who are hiring people to work with Recursion information or business processes must ensure that results from candidate pre-employment or pre-engagement screening processes meet Recursion standards before an appointment is confirmed.

PRODUCT QUALITY

Third-Party partners involved in the supply, manufacturing, packaging, testing, storage and distribution of materials/products on behalf of Recursion will ensure compliance with applicable Quality regulations and Good Manufacturing Practice (GMP) and Good Laboratory Practice (GLP) requirements for the markets in which the products are registered and distributed.
RESPONSIBLE SOURCING OF MINERALS

Seek to identify, reduce and, where possible, eliminate the use of certain minerals known as 3TG (including tantalum, tin, tungsten and gold) that have been identified as included in Recursion products and that have been determined to have directly or indirectly financed or benefitted armed groups in the Democratic Republic of Congo (DRC) or its adjoining countries.

RESOURCE USE

Minimize use of single-use plastic in your operations. Avoid buying single-use plastic products (for example, straws, stirrers, cutlery, and plates, and cups made of expanded polystyrene or oxodegradable plastics).

Take steps to conserve water, energy, and other natural resources, continuously improving efficiency and reducing resource consumption, and using energy from renewable sources when it is available.

SPILLS AND RELEASES

Make sure you have systems in place to prevent and mitigate accidental spills and releases to the environment and any adverse impact on the local community.

WASTE AND EMISSIONS

Work in a way that, as far as practical, avoids the use of hazardous materials; minimizes generation of waste through avoidance, reuse, and/or recycling; and avoids emissions of greenhouse gases from refrigeration systems (for example, HFCs) and production processes (for example, solvents).

ENVIRONMENTAL AUTHORIZATIONS

Comply with all applicable environmental regulations, including obtaining all required environmental permits, licenses, information registrations, and following operational and reporting requirements.
MANAGEMENT SYSTEMS

RISK MANAGEMENT

Make sure you have mechanisms in place to determine and manage risks in all areas addressed in these expectations.

Monitor your processes and activities to make sure they are operating appropriately and that risk control measures are effective.

Have periodic internal/external reviews to measure your risk controls and identify any actions needed to deliver continuous improvement.

Include in your review an assessment of the risks and controls related to work done on your behalf by your own Third Parties.

DOCUMENTATION

Maintain documentation sufficient to demonstrate that you meet these expectations and comply with applicable regulations and reporting requirements to Recursion.

BUSINESS CONTINUITY

Third-Party partners should consider having Business Continuity measures in place for products and services being provided to Recursion, in the case of a disruptive incident.

These plans should be designed and kept current to promptly recover and restore partially or completely interrupted critical functions to minimize disruption to Recursion’s business and protect our reputation.

TRAINING AND COMPETENCY

Make sure you have effective methods in place to communicate these expectations to relevant managers, employees, contractors, suppliers, and their Third Parties.

Provide training that gives them an appropriate level of knowledge, skills, and abilities to meet these expectations. Third Parties shall educate their employees to make ethical decisions in compliance with laws, regulations and contract requirements.
HEALTH & SAFETY

WORKER PROTECTION

Third-Party partners shall protect workers from overexposure to chemical, biological and physical hazards and physically demanding tasks in the workplace and in any company-provided living quarters. Protect people from unhealthy exposure to physical, psychological, chemical, or biological hazards, and have effective process safety controls to prevent and manage releases of chemicals. Make information available about risks associated with safety, health, and the environment, including chemicals and pharmaceutical and other potentially hazardous material, and use the information to train and protect people and manage risks.

HAZARD INFORMATION

Safety information relating to hazardous materials, including pharmaceutical compounds and pharmaceutical intermediate materials, shall be available to educate, train and protect workers from hazards. Hazardous materials can include but are not limited to raw materials, isolated intermediates, products, solvents, cleaning agents and wastes.

EMERGENCY PREPAREDNESS / RESPONSE

Make sure you have identified and assessed emergency situations that could arise in the workplace and in any company-provided living quarters. Minimize the impact of such situations by putting emergency plans and response procedures in place. Business partners shall identify and assess emergency situations in the workplace and any company-provided living quarters and minimize their impact through prevention and by implementing emergency plans and response procedures.

PROCESS SAFETY

Third-Party partners shall have systems and programs in place to identify both occupational and process hazards as well as potential impacts on surrounding communities. They should quantify such hazards, define the risk levels appropriately and have programs and systems in place to prevent or mitigate these risks (e.g. catastrophic releases of chemicals, fumes, dust). Make sure you have processes in place to identify the risks from chemical and biological processes and to effectively prevent or respond to catastrophic release of chemical or biological agents.