



DBV Technologies S.A.

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Code of Ethics and Business Conduct

Updated 02, 2021.



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## DBV's Core Corporate Values

### The "4 Cs"



**Collaboration**  
*Teamwork and Spirit*



**Curiosity**  
*Pushing Boundaries*



**Courage**  
*Be Bold and Take Smart Risks*



**Credibility**  
*Build Trust with Patients, Partners and Shareholders*

# Integrity is ...

*...a core DBV value. We are committed to creating an ethical and compliant culture through **our Core Corporate Values, the "4 Cs"**.*

*We never compromise on ethics and compliance and our personnel must always do the right thing. If you have concerns about any of our business practices, you must speak up!*



## A Message from Daniel Tassé, Chief Executive Officer

Dear Colleagues,

At DBV our mission is to discover, develop, and commercialize innovative solutions to improve the lives of patients with unmet medical needs. We are committed to finding safe, effective, and enduring therapies for patients and families suffering with food allergies and other immunological diseases.

To guide us on this journey, the Executive Committee and I have established **DBV's Core Corporate Values** (the "4 Cs") to help position us for lasting success:

- **Collaboration;**
- **Curiosity;**
- **Courage;** and
- **Credibility**

Together, the **4 Cs** provide one global identity for DBV and establish a foundation for a successful company. Integrity as a hallmark of this organization can only be achieved if these tenets are adopted and continue to be woven into your daily business activities.

As DBV employees, contractors, executive officers, and directors ("DBV Personnel"), we need to **collaborate** in the ways we conduct business, how we think, share and build collectively, and break down silos. This reduces redundancy, improves the quality of our work, and builds trust and connections amongst team members, stakeholders and shareholders.

We need to have **curiosity** - a strong desire to push boundaries and learn from our mistakes. Curiosity gives us the power to push through uncertainty and ask tough questions. The most successful people have boundless curiosity. They win more, and more often, because they never stop looking for ways to improve. That's why being curious is critical to our success.

We need to take smart risks and be bold - this takes **courage**. Courage isn't about making rash decisions, it's about being brave and savvy; using our experience and judgement before acting.



Finally, we need to continuously build trust and **credibility**. The success of our business is dependent on the confidence we earn from our patients, employees, partners and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct.

In the spirit of the **4 Cs** and to achieve our goals in fulfilling our obligations to patients, healthcare professionals, shareholders and other stakeholders, we have updated our Code of Ethics and Business Conduct (the “Code”) to reinforce DBV’s high standards of integrity and ethics. Our commitment to these standards not only ensures that we comply with all applicable laws and regulations where we do business, but is an acknowledgment of the obligation that we have to act with integrity. This commitment to ethical business conduct also enables us to grow our business in a sustainable way.

This Code reflects our core values, business practices, and behavior principles that support this commitment. The Code applies to all DBV Personnel.

I ask each of you to embrace the spirit of the Code and to commit to a strong culture of ethics and compliance, as this is critical to maintaining our position and reputation. Read the Code. Refer to it. Discuss it. Absorb the Code’s meaning and spirit and, of course, do the right thing. If you see something that conflicts with the Code or any of DBV’s policies and procedures, I ask that you speak up through one of the reporting avenues described within the document. We’re in this together and I thank you for your commitment.

Sincerely,

Daniel Tassé  
**Chief Executive Officer of DBV Technologies**



## Our Ethics & Compliance Commitments

DBV Technologies (“DBV” or “Company”) has adopted this Code to aid DBV Personnel in making ethical and legal decisions when conducting the Company’s business and to cause the Company to comply with applicable rules and regulations of all French, U.S., and other governmental entities and other private and public regulatory agencies to which the Company is subject, including The NASDAQ Stock Market, Euronext Paris, and any other exchanges on which the Company’s securities may be listed.

DBV Personnel are notified that this Code shall be provided with the Rules of Procedure (*règlement intérieur*) of the Company and will be publicly available on our website in accordance with applicable rules and regulations. In addition, all DBV Personnel must certify in writing that they have read and intend to comply with this Code and annually complete the acknowledgment attached hereto as *Annex A*.

It is DBV’s policy to promote high standards of integrity by conducting our affairs in an honest and ethical manner. The integrity and reputation of the Company depends on the honesty, fairness, and integrity brought to the job by each person associated with DBV. Unyielding personal integrity is the foundation of corporate integrity.

DBV has also adopted other policies that are not part of this Code, but that DBV Personnel are also required to respect, as applicable.

No Code or policy can anticipate every situation that DBV Personnel may encounter. Accordingly, this Code highlights areas of ethical risk, provides guidance in recognizing and dealing with ethical issues, and establishes mechanisms to report unethical conduct.

The rules appearing in this Code are not a substitute for the laws, rules, and regulations applicable in each country where we do business, and with which DBV is committed to full compliance. They must, however, be understood and applied by all DBV Personnel. DBV does not compromise on ethics and compliance.

In addition to the Code, DBV has a compliance infrastructure of policies and standard operating procedures with which DBV Personnel must comply based on their job responsibilities or contracted services. Since DBV operates in countries around the world, it is possible that a local law may occasionally differ from the rules in our compliance infrastructure. If you notice any such conflict, please notify the Legal & Compliance department and always follow the more stringent rule.



The Code is organized into five major sections:

- 1 Commitment to Patients**
- 2 Interactions with Healthcare Professionals (“HCPs”)**
- 3 Commitment to Society**
- 4 Integrity in Business Practices**
- 5 Reporting Compliance Concerns**

## **1 Commitment to Patients**

### **Patient Safety and Product Quality**

DBV keeps patients at the heart of everything it does. We strive to achieve better patient outcomes and provide innovative solutions to patient needs, while adhering to respective laws and regulations governing those activities.

During research and development, the safety of patients participating in clinical trials is foremost. Clinical trials are conducted with Good Clinical Practice (“GCP”) standards and with the oversight of a qualified institutional review board or independent ethics committee.

We ensure patient safety by identifying, managing, and reporting any product-related risks in a timely manner in accordance with applicable laws and regulations. Additionally, policies and procedures are developed to ensure compliance with good quality practices such as GCP, Good Manufacturing Practices (“GMP”), Good Laboratory Practices, Good Distribution Practices, and Good Pharmacovigilance Practices in which applicable DBV Personnel are trained on. We are committed to developing and manufacturing top-quality products that not only meet all regulatory requirements, including GMP, but also achieve quality beyond compliance. Product quality and safety should never be sacrificed to meet



deadlines or targets. We are committed to identifying, evaluating, and addressing product safety issues on a timely basis.

During all phases and aspects of business, we are firmly committed to data integrity to allow all stakeholders to rely on accurate, truthful, and fully represented data representing our science.

### **Protection of Personal Data**

DBV may obtain private or confidential information about patients or their family members in carrying out its activities, such as clinical research. Keeping patient information and privacy secure is a fundamental right and a top priority for us. This means we will strive to:

- Ensure patient information is always obtained with the appropriate consent and inform patients about how it will be used;
- Adequately safeguard any personal information of our patients when collecting, processing, storing, and transferring this information;
- Ensure that patients' information is used only for the reasons for which the information was gathered; and
- Follow all laws, regulations, and internal policies intended to protect patient privacy.

Many locations have strict regulations for protecting personal information collected and used in the course of business, especially for the most sensitive categories of personal information. We are committed to understanding and following these requirements, and we protect personal and sensitive information from unauthorized disclosure and use.

### **Patient Advocacy Organizations**

DBV understands the true burdens of patients, families, and caregivers who are living with food allergies and other immunological diseases. This understanding drives us in our mission and daily focus. Along with the mission and daily focus, we may engage and interact with patient advocacy organizations. We are committed to complying with global pharmaceutical laws, industry codes of practice, and internal policies and procedures that regulate these interactions with patient advocacy organizations.

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## **Interactions with HCPs**

### **Bribes, Kickbacks, and Other Improper Payments**

DBV will not give, promise to give, or offer to give anything of value, to any person to influence any act or decision, notably when interacting with HCPs and Government Officials ("GOs"). This prohibition also applies to indirect corruption: that is, acts carried out by a third-





party in the name or on behalf of DBV. Anything of value may include, but is not limited to, cash gifts, cash equivalents, entertainment, accommodations, or extravagant meals.

When hiring HCPs/GOs to perform legitimate business activities on behalf of us (including, but not limited to, research and consulting activities), compensation and applicable expenses will be provided at fair market value.

All interactions with HCPs must take place in professional settings and contexts, and we will only offer hospitality that is consistent with our policies and is incidental to educational, clinical, or scientific discussions. Generally, this means that hospitality provided must be infrequent and modest.

### **Transparency Reporting Requirements**

DBV will collect, report, and disclose payments and other transfers of value as required by local laws and dictated by policy.

## **3**

### **Commitment to Society**

#### **Environment and Safety**

It is DBV's policy to conduct our business in an environmentally responsible way that minimizes environmental impacts. We are committed to:

- minimizing and, if practicable, eliminating the use of any substance or material that may cause environmental damage;
- reducing waste generation and disposing of all waste through safe and responsible methods;
- minimizing environmental risks by employing safe technologies and operating procedures;
- and being prepared to respond appropriately to accidents and emergencies.

We are committed to adhering to the environmental laws and regulations applicable to our operations. DBV strives to create a healthy and safe environment for DBV Personnel, partners and stakeholders. Nobody should get injured while working with or for us. We aim to provide a safe and healthy work environment and to work with DBV Personnel and contractors to develop a culture that encourages both personal and collective responsibility for health and safety. To achieve this goal, DBV Personnel shall perform business activity in compliance with all health and safety laws and rules applicable to their workplace and attend to any training that might be set up in these fields.



### **Equal Opportunity Employer**

DBV highly values the diversity of backgrounds, skills, and abilities that a global workforce brings to our business. We hire DBV Personnel with sound character and judgment, whom we trust will act responsibly. We are committed to supporting diversity in our workforce and leadership and to developing all the talent within our organization. We are committed to adhering to the applicable employment and equal treatment laws in various aspects of employment, including recruiting, hiring, compensation, promotion and termination.

### **Zero Tolerance for Discrimination and Harassment**

DBV is committed to treating our colleagues and job applicants with fairness and respect. Our policies prohibiting discrimination, harassment, and retaliation are global policies intended to create a workplace that promotes a positive and productive environment. We believe in cooperation, teamwork, and trust, which contribute to a positive work environment. Thus, we value and promote a workplace that is inclusive and fair, and which fosters respect for all DBV Personnel and business partners. To keep a work environment in which personal dignity, privacy, freedom of association, and collective bargaining is safeguarded, behaviors that constitute unlawful harassment, discrimination, or hostility are not tolerated.

### **Political Activities and Contributions**

As a member of civil society, DBV observes strict political, religious, and philosophical neutrality. Therefore, our policy is to make no financial contribution to political candidates, elected representatives, or political parties.

We also respect the individual commitment of our personnel who, as citizens, may participate in political or public activities. Nevertheless, DBV Personnel must engage on their own behalf, and such commitments must not affect the activities or image of DBV, nor may they affect the neutral position of DBV.

Political contributions, including donations of money, time, resources or other DBV assets, by or on behalf of DBV to any political candidates may be prohibited or regulated under applicable French, U.S. and other election and anti-bribery laws, such as the Foreign Corrupt Practices Act, the UK Bribery Act and the International Criminal Judicial Assistance Law.

### **Data Privacy**

DBV collects, processes, and uses personal data of various individuals including DBV personnel, patients, and partners, to fulfil our operational activities. We comply with all applicable laws and regulations concerning how individual personal data is collected, processed, and used. We must always respect and protect the privacy of our personnel, patients, customers, suppliers, and partners.



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## Integrity in Business Practices

### Fair Dealing

DBV strives to outperform our competition fairly and honestly through superior performance and not through unethical or illegal business practices. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present DBV Personnel of other companies is prohibited, even if motivated by an intention to advance DBV's interests. We strive to be fair and straightforward about how we conduct business in all our professional interactions.

Accordingly, it is our policy that you must endeavor to deal ethically, fairly, and lawfully with our commercial partners, suppliers, competitors, and anyone else with whom you have contact while performing your job. You should not take unfair advantage of anyone in the fulfillment of your responsibilities at DBV through manipulation, concealment, the abuse of privileged information, including but not limited to competitively sensitive information, misrepresentation of material facts, or any other unfair dealing practice.

DBV Personnel involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service, and reputation, and not on the receipt of special favors.

### Conflicts of Interest

We all must dedicate our best efforts to the success of DBV and ensure that our efforts are not compromised by potential conflicts of interest. DBV Personnel must put the best interests of DBV at the forefront of any work-related activity or decision. DBV Personnel with a conflict may make decisions that undermine or differ from DBV's strategies, objectives, or interests. Conflicts can also lead to business disruption, a decrease in productivity, and reputational damage.

A conflict of interest is any situation in which DBV Personnel have multiple interests that affect or are likely to affect the motivations or decision-making of DBV Personnel. A potential conflict of interest occurs when DBV Personnel have a professional or personal interest that prevents them from performing their job without bias. It may relate to his/her own personal interests or those of a family member or other closely related person, a friend, or another entity he/she is involved with. Conflicts of interest also arise when a member of DBV Personnel or a member of his or her family, receives improper personal benefits as a result of his or her position in the Company.

All DBV Personnel, including members of the Executive Committee and members of the Scientific Advisory Board, are responsible for avoiding situations that present – or create the appearance of – a conflict between their interests and those of DBV.



We expect DBV Personnel to be free from influences that conflict with the best interests of DBV or might deprive DBV of their undivided loyalty in business dealings. A conflict of interest could also arise if DBV Personnel, a Scientific Advisory Board member, or other individual serving DBV is also responsible for government regulatory approvals. If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an officer or director of DBV, you should discuss the matter with your supervisor or contact the Legal & Compliance department. Officers and directors must seek any authorizations and determinations from the Audit Committee and the Board, depending on the nature of the conflict of interest.

### **Company Property and Corporate Opportunities**

We all have a fundamental responsibility to protect and use DBV property properly, act in DBV's best interests, and advance those interests whenever the opportunity to do so arises. DBV Personnel must protect DBV's assets and ensure that they are put to efficient use. Theft, carelessness and waste have a direct impact on DBV's profitability, and all DBV assets should be used for legitimate business purposes.

DBV Personnel shall only use the assets and services of DBV for the purpose of proper business needs and not for the benefit of themselves or any others. DBV Personnel must not take for themselves personally or for other connections any opportunities that are discovered using DBV property, information or position, use any DBV property or information for personal gain, or compete with DBV. DBV must be notified of any opportunity DBV Personnel come across for which DBV would reasonably be expected to have an interest. Only if DBV passes on the opportunity may DBV Personnel act on it for personal gain.

### **Insider Trading**

Insider trading occurs when persons with material non-public information regarding DBV and its subsidiaries or any company with publicly traded securities disseminate such material non-public information, effect transactions in DBV securities or the securities of any other implicated public company until such time as the information is made public, and tip others to trade in DBV's securities or such other company's securities, under penalty of administrative or criminal sanctions.

Under EU Regulation, inside Information is information of a precise nature, which has not been made public, relating directly or indirectly to DBV or DBV's financial instruments, and which, if it were made public, would be likely to have a significant effect (whether positive or negative) on the prices of DBV financial instruments or on the price of related derivative financial instruments. Under U.S. law, "material non-public information" is any information that a reasonable investor would consider important in making a decision to buy, hold or sell securities.



DBV Personnel must exercise the utmost care when handling material inside information. Insiders must refrain from (i) engaging or attempting to engage in the purchase or sale of DBV securities or the securities of any other publicly traded company when they are in possession of inside information (ii) disclosing or attempting to disclose the inside information, outside the normal scope of their work, profession or duties, (iii) recommending or attempting to recommend that another person purchase or sell

securities and (iv) using or communicating a recommendation or encouragement made by an insider, if the person knows or ought to know that it is based on inside information.

We have adopted a separate Securities Trading Policy with which DBV Personnel will be expected to comply as a condition of employment with DBV. You should consult the Securities Trading Policy for more specific information on the definition of “inside” or “material non-public” information and on buying and selling DBV securities.

### **Antitrust and Competition**

It is DBV’s and DBV personnel’s responsibility to comply with European, U.S., international, and local antitrust and competition laws. Antitrust and competition laws are very numerous, technical, vary from country to country, and protect patients and society by encouraging free, fair, and open markets.

In accordance with the Code, we commit not to:

- Agree with competitors to fix prices and should avoid any discussions with competitors regarding pricing, costs, or terms or conditions of sale and any agreements with others to boycott customers or suppliers;
- Work with competitors to divide markets, customers, or territories and enter into agreements with competitors regarding allocating markets or customers;
- Engage in any communication with competitors about bids or set the terms or outcome of a binding process; and
- Engage in discussions with suppliers and customers that unfairly restrict trade or exclude competitors from the marketplace.

Trade or industry associations bring together competitors who might discuss matters of mutual concern. While many of these discussions are appropriate, we must make sure not to potentially

cross the line of non-compliance with antitrust law obligations. If a conversation turns to any kind of anti-competitive discussion, you should refuse to discuss the matter, leave the conversation immediately, and report it to the Legal & Compliance department.



## **Confidential Information**

One of DBV's most important assets is our confidential information. As DBV Personnel, you may learn of information about DBV that is confidential and proprietary. You also may learn of information before that information is released to the general public. DBV Personnel who have received or have access to confidential information should take care to keep this information confidential. Protecting this information plays an important role in DBV's continued growth and success. Confidential information includes, but is not limited to, information about undisclosed pre-clinical and clinical research, investigational products, manufacturing processes, technical data, customer information, pricing, marketing plans, actual and proposed business plans and strategies, financial data, information related to DBV Personnel, and all non-public information that might be of use to competitors or harmful to DBV or its partners if disclosed.

DBV Personnel may not disclose or distribute DBV's confidential information, except when disclosure is authorized by DBV or required by applicable law, rule, or regulation. DBV Personnel shall use confidential information solely for legitimate business purposes. DBV Personnel must return all of DBV's confidential and/or proprietary information in their possession to DBV when they cease to be employed by, or to otherwise serve, DBV. Even after leaving DBV, DBV Personnel must continue not to disclose confidential or proprietary information.

Unauthorized use or distribution of proprietary information violates DBV policy and could be illegal. Such use or distribution could result in negative consequences for both DBV and the individuals involved, including potential legal and disciplinary actions.

In addition, because DBV Personnel interact with other companies and organizations, there may be times when you learn confidential information about other companies before that information has been made available to the public. You must treat this information in the same manner as you are required to treat DBV's confidential and proprietary information. There may even be times when you must treat as confidential the fact that we have an interest in, or are involved with, another company. This policy requires you to refrain from discussing confidential or proprietary information with outsiders and even with other DBV Personnel, unless those fellow personnel have a legitimate need to know the information to perform their job duties.

You are expected to keep confidential information and proprietary information confidential unless and until that information is released to the public through approved channels (usually through a press release, a filing with the French Autorité des Marchés Financiers ("AMF") and/or the U.S. Securities and Exchange Commission ("SEC"), or a formal communication from a member of senior management).

You should consult the Securities Trading Policy for more specific information on the restrictions around disclosing "inside" information (as defined in that policy) before it has been made public in accordance with the requirements of that policy.



Nothing in this or any other section of this Code or any other DBV Policy is intended to restrict any rights DBV Personnel may have under law to make protected disclosures including (to the extent applicable) disclosing information about his/her working conditions

and terms and conditions of employment, or to communicate about these matters or to make complaints to the legal authorities.

**Maintenance of Corporate Books, Records, Documents and Accounts; Financial Integrity; Public Reporting**

The integrity of DBV's records and public disclosure depends upon the validity, reliability, accuracy, and completeness of the information supporting the entries to our books of account. Therefore, our corporate and business records should be completed accurately and honestly. The making of false, artificial, or misleading entries, whether they relate to financial results or test results, is strictly prohibited. Documents that require signatures, either electronic or handwritten, must be signed by the person whose name appears on the document. Our records serve as a basis for managing our business and are important in meeting our obligations to partners, suppliers, creditors, personnel, and others with whom we do business. As a result, it is important that our books, records, and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs, and expenses, as well as all transactions and changes in assets and liabilities. Our records are viewed broadly and include records in all mediums, such as paper, audio or video recordings, and computer-based information, including emails and electronic files. We require that DBV Personnel comply with our system of internal controls and that all transactions be supported by appropriate documentation. This documentation must conform to applicable accounting standards, laws and regulations, as well as DBV's policies, procedures, and controls. Records include financial statements, bills, invoices, expense reports, payroll and benefit records, time sheets, research and manufacturing records, performance evaluations, safety-related records, and other essential data.

Creating and maintaining accurate books and records means:

- Not falsifying a record or trying to hide the true nature of a transaction;
- Not trying to bypass internal controls and procedures, even if you think it would be harmless or save time;
- Not hiding or destroying records to avoid disclosure in legal or government proceedings;
- Cooperating with internal and external auditors and being honest with them; and
- Following instructions received from Legal & Compliance department to retain documents, such as required holds in ongoing or anticipated litigation, government investigations, or audits.

Our accounting records are also relied upon to produce reports for our management, shareholders, and creditors, as well as for governmental agencies. We rely upon our



accounting and other business and corporate records in preparing the reports and documents we file with or submit to the AMF or the SEC, and in our other public communications. French and U.S. securities laws require that these reports provide fair, accurate, timely, and understandable disclosure and fairly present our financial condition and results of operations. Personnel who collect, provide, or analyze information for or

otherwise contribute in any way in preparing or verifying these reports should strive to ensure that our financial disclosure is accurate and transparent and that our reports contain all of the information about DBV that would be important to enable shareholders and potential investors to assess the soundness and risks of our business and finances and the quality and integrity of our accounting and disclosures.

Company records must be retained according to applicable laws and DBV's policies and guidelines. Requests by third parties (such as governmental agencies), lawsuits or other inquiries may necessitate the need to hold records beyond normal retention schedules.

Any DBV Personnel who becomes aware of any departure from these standards should report his or her knowledge promptly to his or her supervisor, the Legal & Compliance department, the Audit Committee, or through the Ethics & Compliance Integrity Hotline described below.

### **Compliance with Laws**

All DBV Personnel are expected to adhere to and conduct business in accordance with all laws, rules, and regulations. This is a fundamental expectation and condition of employment. DBV Personnel may not instruct or request others to violate applicable law or applicable DBV policies. As employees of a global company, DBV Personnel must keep in mind that the laws of one country may apply to the way we work in other countries and be mindful of the requirements for each location.

### **Public Disclosures; Media/Public Discussions**

DBV is committed to providing its shareholders with information about its financial condition and results of operations as required by applicable French and U.S. securities laws. It is DBV's policy that the reports and documents we file with or submit to the AMF or the SEC, and our earnings releases and similar public communications made by us, include fair, timely, and understandable disclosure. DBV Personnel who are responsible for these filings and disclosures, including DBV's principal executive, financial, and accounting officers and employees, must use reasonable judgment and perform their responsibilities honestly, ethically, and objectively to ensure that this disclosure policy is fulfilled.

DBV Personnel should not make statements to the media about DBV's business without appropriate authorization. It is our policy to disclose material information concerning DBV to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in DBV will have equal access to information. All





inquiries or calls from the press and financial analysts should be referred to duly authorized DBV Personnel. Unless the Chief Executive Officer has made a specific exception, these designees are the only persons who may communicate with the press on behalf of DBV.

### **Anti-Money Laundering and Combating of Financing of Terrorism**

Money laundering is a crime involving disguising the source of money connected with criminal activity, such as terrorism, drug trafficking or bribery. DBV prohibits all directors, officers, personnel, agents, sales representatives, consultants, distributors, brokers, and other independent contractors from engaging in any activity that facilitates money laundering or the funding of terrorist or criminal activities in connection with our business. DBV expects all above persons to comply with all applicable laws and regulations regarding such activity.

### **Export Controls and Trade Sanctions**

DBV is subject to French, U.S., and other applicable export control laws and sanctions. DBV may also be subject to the trade laws of other countries. All directors, officers, personnel, agents, sales representatives, consultants, distributors, brokers, and other independent contractors must comply with all such applicable laws. Unless prior approval of the Legal & Compliance department is obtained in advance, the above persons may not engage in any DBV-related business involving (i) any country that becomes subject to sanctions or embargoes imposed by the U.S. government or (ii) any individual or entity identified on the List of Specially Designated Nationals & Blocked Persons, List of Foreign Sanctions Evaders (both administered by the U.S. Office of Foreign Assets Control), or other similar U.S. and French prohibited party lists. DBV will not engage in business with countries or parties subject to such trade sanctions unless lawful and properly authorized. DBV will provide accurate and truthful information about products and other items to customs and other relevant authorities and will not cooperate with any requests to participate in international boycotts as prohibited by law.

### **Government Investigations**

DBV cooperates fully with government requests for information, facility inspections, and investigations. Effective engagement with regulators is critical to our reputation and our ability to deliver safe, effective, and high-quality products. We have specific procedures in place for responding to regulatory inspections and specific guidelines for responding to legal process. DBV Personnel are to contact the Legal Department immediately to discuss the appropriate handling of government visits and investigations including any request for DBV's records.



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## Reporting Compliance Concerns

As a global company, DBV has a culture of ethics and compliance that includes daily efforts to always do the right thing in the right way. We recognize that it may be difficult to bring a potential concern or a known issue forward. However, speaking up is crucial to the culture and to long-term sustainability. When a situation and/or interaction does not seem right, speaking up demonstrates integrity and the courage to do the right thing. It helps prevent mistakes and misconduct, while promoting continuous improvement. In addition, it is because we care about DBV Personnel, patients, customers, and business partners that we take reporting concerns seriously.

Each one of us, regardless of position, shares the responsibility for creating a positive work environment. You can bring forward any concerns, questions, or suggestions regarding any DBV Personnel to your supervisor, Human Resources, or the Legal & Compliance department. In addition, there are other methods of reporting addressed below that allow for anonymous reporting.

Any information provided by DBV Personnel will be treated as confidential to the extent reasonably possible, subject to applicable law. DBV Personnel acting in good faith, who have any doubt or suspicion relating to a violation of the Code, policies, procedures, or any law, will not be subject to any form of retaliation, such as a change of status, harassment, or any other form of discrimination, because of reporting compliance concerns. By truthfully reporting a doubt or suspicion, you are helping DBV. We will take prompt disciplinary action against any DBV Personnel who retaliates against you, up to and including termination of employment. Misconduct may include violations of this Code and DBV's policies, failure to raise a known or potential issue, not cooperating with an investigation, or intimidating or engaging in retaliation against an employee who raises a potential issue or provides information during an investigation. DBV reserves the right to discipline anyone who knowingly makes a false accusation, provides false information about DBV, or has acted improperly.

DBV takes violations of the Code, policies, procedures, or any law very seriously. All allegations of wrongdoing will be promptly investigated. Investigations are conducted as confidentially as possible, subject to DBV's need to share information for investigation purposes and consistent with applicable laws. We also reserve the right to report DBV Personnel who have violated the law to the applicable regulatory authorities in our discretion.

DBV's Ethics & Compliance Integrity Hotline ("Hotline") allows DBV Personnel to report a concern, obtain information. The Hotline can be reached by phone or online via the web. The toll-free Hotline is available 24 hours a day, 365 days a year, and is operated by third-party representatives.



### **North America**

Online: <https://secure.ethicspoint.eu>

Alternatively, by telephone:

United States: 1-844-471-7682

Canada: 1-844-471-7682 (primary language English)

Canada: 1-855-350-9393 (primary language French)

### **All Countries, excluding North America**

Online: <https://secure.ethicspoint.eu>

Alternatively, by telephone:

France: 0800-91-9296

Australia: 1-800-270-634

### **Reporting Possible Violations of Executive Officers or Directors; Waivers and Modifications**

As discussed above, you can and are encouraged to bring forward any concerns, questions, or suggestions regarding violation of the Code, policies, procedures, or any law by DBV Personnel to your supervisor, Human Resources, or the Legal & Compliance department. Any concerns about violations of the Code, policies, procedures, or any law by any executive officer or director should be reported promptly to the Legal & Compliance department. Any such concerns involving the Legal & Compliance department should be reported to a member of the Audit Committee.

The Company reserves the right to amend, modify, waive or terminate any or all of the provisions of the Code at any time for any reason. The Company intends to report any changes to this Code to the extent required by the rules of the SEC, The NASDAQ Stock Market and/or any other securities exchange on which the Company's securities are listed, and to any other regulatory authorities whose regulations apply to the Company.

Any waiver of any provision of this Code granted to any director or executive officer of the Company must be approved by the Company's Board of Directors. Any waiver of any provision of this Code granted to anyone other than a director or an officer of the Company must be approved by the Legal & Compliance department. The Company will publicly disclose any waivers of this Code made to any executive officer or director of the Company and will publicly disclose any amendments to this Code, as required by the rules of the SEC and any applicable rules of The NASDAQ Stock Market and/or any other exchange on which the Company's securities are listed.



## ANNEX A

### ACKNOWLEDGMENT OF RECEIPT AND REVIEW

I, \_\_\_\_\_, acknowledge that I have received and read a copy of the Code of Ethics and Business Conduct (the "Code") of DBV Technologies S.A. I understand the contents of the Code and I hereby undertake to comply with the policies and procedures set out in the Code.

\_\_\_\_\_  
[SIGNATURE]

\_\_\_\_\_  
[PRINTED NAME]

\_\_\_\_\_  
[DATE]