



Invivyd, Inc. Corporate Program Compliance

Invivyd, Inc. ("Invivyd" or "Company") is headquartered in Waltham, Massachusetts. Invivyd is committed to the highest standards of corporate conduct in all of our business dealings. At Invivyd, all employees are expected to lead and foster a culture of ethical and compliant behavior.

California Declaration of Compliance

Effective March 6, 2024

This information is provided pursuant to the requirements of California Health & Safety Code, Section 119402, which requires pharmaceutical companies doing business in California to make available their compliance program and annual written declaration of compliance with the compliance program.

Invivyd hereby declares that to the best of its knowledge, information and belief, it is in material compliance with its Corporate Compliance Program ("CCP") and its good faith understanding of the requirements of California Health and Safety Code §§119400-119402. Our CCP, which is described in further detail below, contains the elements of an effective compliance program identified in the "Compliance Program Guidance for Pharmaceutical Manufacturers" published by the Office of the Inspector General, U.S. Department of Health and Human Services ("HHS-OIG Guidance"). In addition, Invivyd adheres to the "Code on Interactions with Healthcare Professionals" published by The Pharmaceutical Research and Manufacturers of America (the "PhRMA Code") and has policies, procedures and processes designed to help ensure compliance with the PhRMA Code.

For purposes of compliance with the requirements of the California Compliance Law and as part of the CCP, Invivyd has established a specific annual aggregate dollar limit of \$2,000 that may be provided to an individual medical or healthcare professional in California on an annual basis from January 1st to December 31st. This limit represents a spending cap, not a goal or average; in many cases, the amount spent per physician may be substantially less than the cap amount. Invivyd has established an internal monitoring system designed to help ensure compliance with the annual spending limits in California and is working to establish additional monitoring processes.

Such items or activities primarily include modest meals associated with a substantive discussion of a Company product or a related disease state and items or activities permitted under the PhRMA Code, and/or the HHS-OIG Guidance. The items and activities are primarily directed to the dissemination or communication of medical and scientific information as a resource for healthcare professionals to assist in making clinical or other medical judgments. This limit may be revised from time to time, in which case the revised limit will be published in this section of Invivyd's website.



The annual limit following expenses are excluded from the limit:

- (i) expenses of a de minimis value (i.e., with a value of \$10 or less);
- (ii) payments for legitimate professional services, and any meals or expenses associated with the provision of such services;
- (iii) items provided to healthcare professionals that are ultimately intended for patients or consumers for the purpose of educating the patient or enhancing the patient's understanding or management of the condition;
- (iv) fellowships and financial support for health educational scholarships;
- (v) financial support for continuing medical education forums and receptions at third-party educational or professional meetings; and
- (vi) drug samples given to healthcare professionals intended for free distribution to patients.

Corporate Compliance Program ("CCP")

Invivyd has developed its CCP to be tailored to its size, organizational structure, and resources. Compliance is a dynamic concept and, therefore, while the CCP is intended to prevent improper conduct from occurring, it cannot entirely eliminate improper conduct. Accordingly, Invivyd does not represent that it can eliminate improper conduct or completely prevent individual employees from engaging in improper conduct. Our CCP is an evolving and flexible program that is designed to account for growth and other changes in the Company, as well as changes in our legal, regulatory or industry obligations. We reevaluate our CCP on a regular basis for opportunities to further enhance its reach and effectiveness.

Chief Compliance Officer and Oversight

Invivyd has a Chief Compliance Officer (CCO) who is responsible for the development and enhancement of our CCP designed to meet external requirements. This includes providing interpretive guidance in applying Invivyd's Code of Business Ethics and Conduct (the "Code") and relevant policies to specific situations and for generally overseeing implementation and enforcement of the CCP. The CCO and/or designee(s) conduct and/or monitor investigations into alleged violations of law and/or Company policies or procedures. As a result of these investigations, the CCO, and others as appropriate, determine corrective, preventative and/or disciplinary actions to be taken, which are monitored to ensure completion. The CCO has access to and makes reports regarding compliance matters to the Chief Executive Officer and other senior-level leaders.

Written Standards

Invivyd's Code sets forth the core values, standards and guidelines for employees and personnel that conduct business on behalf of the Company. It explains the Company's



expectation for ethical and compliant behavior for those who work for Invivyd or on behalf of the Company. It emphasizes Invivyd's commitment to integrity in every relationship and with every transaction. In addition to the Code, Invivyd has policies and guidelines. They encompass relevant laws and regulations. They also take into account industry best practices, including provisions of the PhRMA Code. Guidance documents are reviewed and updated to reflect current laws and regulations.

Training and Education

Invivyd is committed to providing effective training and education for its employees to help ensure an understanding of Invivyd values, the Code, individual employee obligations and Company policies. Targeted trainings are mandatory for individuals, especially those in key risk areas, such as sales, marketing, medical affairs, and market access. The CCO and/or designee(s) review and update training materials to provide employees with the most current information regarding policies and the law.

Open Lines of Communication

Invivyd is committed to fostering dialogue between management and employees through multiple channels. It is Invivyd's goal for employees to know where to turn when they are seeking answers to questions or reporting potential instances of violations of law, the Code, and/or Company policies. Employees are encouraged to contact their management, human resources, the CCO, the Chief Legal Officer or the hotline.

Invivyd's hotline is available 24 hours a day, 7 days a week, to report potential violations or ask questions regarding legal obligations, policies, the Code and the CCP. Any questions or reports may be submitted by telephone at 866-INVIVYD (866-468-4893) or online at <https://www.invivyd.com/SpeakUp>. Anonymity is available.

Auditing and Monitoring

Invivyd's CCP includes ongoing efforts to assess and monitor compliance with the law, the Code, policies and procedures. The nature, extent, and frequency of these activities depends on a variety of factors, including new regulatory requirements, changes in business practices and other considerations. An auditing program will be established as we advance further into commercialization. The CCO will report assessment, monitoring and audit results to leadership and corporate governance committees as applicable.



Responding to Violations, Corrective Actions and Accountability

Through the CCP, Invivyd has established mechanisms to identify suspected improper conduct and to take appropriate disciplinary and/or corrective action in the event that improper conduct occurs. Invivyd's CCP includes accountability and disciplinary principles. Invivyd employees and personnel that conduct business on behalf of the Company are expected to adhere to the law, the Code and Invivyd policies. Violations of the same can have serious consequences, including disciplinary action up to and including termination of employment. Employees that fail to report violations may also be subject to disciplinary action. Invivyd does not tolerate retaliation against anyone who makes a good-faith report of violations. Invivyd will communicate results of investigations of violations, audits and monitoring to management and corporate governance committees as applicable. In addition to disciplinary action and communicating results to the appropriate staff and business leaders, Invivyd also assesses whether a violation may be due in part to gaps in Invivyd's policies, training, business practices or other controls. If so, Invivyd is committed to implementing corrective measures to enhance its controls to prevent further violations.

Invivyd periodically assesses the effectiveness of its CCP and implements changes as needed. For a copy of this Declaration of Compliance and description of Invivyd's CCP, call the Invivyd hotline at 866-INVIVYD (866-468-4893) or email the CCO at Compliance@Invivyd.com. If you call the Hotline, please state that you are requesting a printed copy of Invivyd's Declaration of Compliance.