

PMV PHARMACEUTICALS, INC.
VENDOR CODE OF BUSINESS CONDUCT AND ETHICS

Purpose

PMV Pharmaceuticals, Inc. is dedicated to conducting its business in accordance with all applicable laws and consistent with the highest standards of business ethics.

Similarly, we expect our vendors, as well as their employees, agents, and subcontractors (collectively referred to as “Vendors”) to embrace our commitment to integrity and personal responsibility by always complying with this Vendor Code of Business Conduct and Ethics (this “Vendor Code”) while conducting business with or on behalf of the Company. We understand that Vendors are independent entities, but the business practices and actions of a Vendor may significantly impact and/or reflect upon PMV Pharma. We therefore expect all Vendors to understand and adhere to this Code while they are conducting business with PMV Pharma or on our behalf.

Compliance with Laws and Regulations

Each Vendor must conduct its business activities with or on behalf of the Company in compliance with applicable laws and regulations, and must, without limitation:

- **Antitrust.** Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which the Vendor conducts business. Vendors should promote free and fair competition in the marketplace and avoid business practices that have the purpose or effect of limiting competition, such as bid rigging, price fixing, cover pricing or market sharing.
- **Anti-Corruption.** Avoid bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector, including the Company’s officers and employees. Vendors must comply with all applicable anti-corruption and anti-money laundering laws of any country in which they operate, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. Vendors must not, directly, or indirectly, offer or pay anything of value (including travel, gifts, hospitality expenses and charitable donations) to any official or employee of any government, government agency, political party, public international organization, or any candidate for political office for the purpose of improperly inducing such individual to misuse his or her position to promote the business interests of such Vendor or the Company in any respect. Vendors should be honest, direct, and truthful in all discussions with regulatory agency representatives and government officials.
- **Licensing/Permits.** Obtain all required licenses or permits to conduct business activities.
- **Privacy.** Comply with all laws and regulations regarding the privacy of information, data protection and cross-border data flows.
- **Trade.** Comply with all applicable trade controls, as well as all applicable export, re-export and import laws and regulations.

Business Practices and Ethics

Each vendor must conduct its business in a manner consistent with the highest standards of business ethics and in compliance with its own applicable professional standards, and must, without limitation:

- **Animal Welfare:** All animal research conducted by the Company or a Vendor in connection with the development of any of our precision oncology product candidates is done in accordance with industry and government standards to ensure appropriate care for the animals.
- **Business Records:** Accurately record and report all business and financial information and comply with all applicable standards, laws, rules, and regulations concerning the completion, accuracy and retention of such records and reports.
- **Clinical Trials:** If conducting clinical trials on our behalf, Vendors are expected to do so in accordance with all applicable international guidelines, national and local laws and regulations, as well as the strictest medical, scientific and ethical principles.
- **Confidential Information:** Safeguard all non-public information of the Company or third parties with which the Company conducts business that might be of use to competitors or, if disclosed, harmful to the Company or such third parties, unless disclosure is authorized or legally mandated, and then only in compliance with applicable confidentiality agreements and procedures.
- **Conflicts of Interest:** Avoid any conflict or potential conflict of interest that makes it difficult to conduct the Company's business objectively and effectively. Vendors should immediately report any such actual or potential conflict of interest to the Company's General Counsel or through the Company's whistleblower hotline at <https://www.whistleblowerservices.com/PMVP>. The Company's General Counsel will determine whether a conflict of interest exists and, if so, how best to address it.
- **Fair Dealing:** Deal fairly in all relationships and avoid taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or other unfair practices.
- **Gifts and Entertainment:** Avoid gifts and entertainment that might compromise or appear to compromise the ability of the recipient to make objective and fair business decisions or that could be viewed as an inducement to or reward for any particular business decision, and properly account for all gifts and entertainment expenses on expense reports.
- **Insider Trading:** No trading in the Company's publicly traded stock if in possession of information about such company that has not been made generally available to the public and that a reasonable investor would consider important in a decision to buy, hold, or sell such stock. Avoid recommending, "tipping" or suggesting that anyone else buy or sell the Company's stock based on such material, nonpublic information.
- **Political Contributions and Activities:** Ensure that political activity, to the extent undertaken or authorized by a Vendor, is conducted on a Vendor's property and time and using a Vendor's resources. It is Company policy that Company funds or assets shall not be used to make a political contribution to any political party or candidate without prior approval by our Chief Executive Officer.
- **Public Communications:** Direct all news media or others making requests for information regarding the Company to our Chief Executive Officer, Chief Financial Officer and General Legal Counsel who will evaluate and coordinate a response to the request.

Protection and Use of Company Assets

To ensure the protection and proper use of the Company's assets, each Vendor must, without limitation:

- **Business Use:** Use the Company's telephone system, other electronic communication services, written materials, and other property only for business-related purposes.
- **Care:** Exercise reasonable care to prevent and report to the Company the actual or suspected theft, damage, or misuse of Company property.
- **Security:** Safeguard all electronic programs, data, communications, and written materials from unauthorized access by others.

Health and Safety

The Company is committed to maintaining a healthy and safe work environment. Each Vendor is expected to integrate sound health and safety management practices into all aspects of its business, and must, without limitation:

- **Alcohol and Drugs:** Prohibit the use of alcoholic beverages, except at sanctioned events, and prohibit the possession, use, distribution or sale of illegal drugs and other controlled substances under all circumstances while on duty or on the premises of the Company or any Vendor.
- **Violence and Weapons:** Prohibit weapons of any kind on Company property, subject to applicable laws, and not tolerate violence or threats of violence in or related to the work environment. The only exception to this policy applies to law enforcement and security personnel who are legally authorized to carry weapons and have received written permission from the Company.
- **Working Conditions:** Provide a safe and healthy work environment and fully comply with all health and safety laws, regulations, and practices, including those applicable to the areas of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and housing.

Labor Practices and Human Rights

The Company pursues fair employment practices in every aspect of its business. Each Vendor must conduct its employment practices in compliance with all applicable labor laws and regulations, and must, without limitation:

- **Anti-Discrimination and Diversity:** Cooperate with the Company's commitment to provide equal opportunity and fair treatment to all individuals on the basis of merit, without discrimination because of race, color, creed, gender, religion, national origin, ancestry, pregnancy, age, marital status, registered domestic partner status, sexual orientation, medical condition (including genetic characteristics or physical or mental disability), veteran status, or any other consideration made unlawful by foreign, Federal, State or local laws. We encourage our Vendors to foster diversity within their work force and provide an inclusive and nondiscriminatory working environment in which all employees are valued and empowered to succeed.

- **Anti-Harassment:** Avoid harassment in any form, whether physical or verbal and whether committed by supervisors, non-supervisory personnel, or non-employees. Harassment may include but is not limited to offensive sexual flirtations, unwanted sexual advances or propositions, verbal abuse, sexually or racially degrading words, or the display in the workplace of sexually suggestive objects or pictures. Vendors should immediately report any such conduct to the Company's General Counsel and/or PMV's Head of Human Resources.
- **Freedom of Association:** Respect workers' rights to freedom of association and collective bargaining in accordance with applicable legal requirements.
- **Prevention of Underage Labor:** Comply with all applicable minimum age laws or regulations and not use child labor. Vendors may not employ anyone under the age of 15, the minimum age for employment in the applicable location, or the age for completing compulsory education in that location, whichever is highest. The Company only supports the development of legitimate workplace apprenticeship programs for the educational benefit of young people and will not do business with those who abuse such systems. Children under the age of 18 are prohibited from doing work likely to jeopardize their health, safety, or morals.
- **Non-Retaliation:** Prohibit retaliation against any Vendor or Company employee who, in good faith, seeks help or reports known or suspected violations of this Vendor Code.
- **Voluntary Labor:** Use only voluntary labor. The use of forced labor, whether in the form of indentured labor, bonded labor, or prison labor, by Vendors is prohibited. Also prohibited is support for any form of human trafficking of involuntary labor through threat, force, fraudulent claims, or other coercion. Workers must not be required to surrender any government-issued identification, passports or work permits or to post any other "deposits" as a condition of employment and must be permitted to terminate their employment in accordance with applicable laws and regulations without unlawful penalty.
- **Wages and Benefits:** Pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. Wages and benefits paid for a standard work week must meet, at a minimum, all applicable standards, laws, and regulations. Deductions from wages as a disciplinary measure (without the express, written permission of the worker) or as otherwise prohibited by applicable laws or regulations are not permitted.
- **Working Hours:** Restrict workdays to the maximum hours of daily labor set by local laws and regulations and ensure that overtime is paid in accordance with applicable laws and regulations.

Environmental Sustainability

The Company is committed to sustainability and the protection of the environment. Vendors are encouraged to share our commitment by meeting or exceeding the requirements of applicable environmental laws and regulations and promoting sustainable business practices. At a minimum, each Vendor is expected to, without limitation:

- **Environmental Permits:** Obtain, maintain, and keep current all required environmental permits and registrations, and follow the operational and reporting requirements of such permits.
- **Hazardous Materials:** Identify and prudently manage substances that pose a threat to the environment, if released.

- **Resource Reduction:** Endeavor to reduce or eliminate waste of all types, including water and energy, through the implementation of appropriate conservation measures in their facilities; their maintenance and production processes; and recycling, reusing, or substituting materials.

Seeking Help and Information

This Vendor Code is not intended to be a comprehensive rulebook and cannot address every situation that Vendors may face. If there are any doubts about whether an action is consistent with this Vendor Code or the Company's ethical standards, seek help. Vendors are encouraged to contact the Company's General Counsel directly and/or PMV's Head of Human Resources, as described below.

PMV Pharmaceuticals, Inc. Contacts:

David Mack
Chief Executive Officer
dmack@pmvpharma.com

Winston Kung
Chief Financial Officer/Chief Operating Officer
wkung@pmvpharma.com

Robert Ticktin
General Counsel
rticktin@pmvpharma.com

Crystal Zuckerman
Head of Human Resources
czuckerman@pmvpharma.com

Reporting Violations of the Vendor Code

All Vendors should immediately report any known or suspected violation of this Vendor Code, including any violation of applicable laws, rules, regulations, or policies, to the Company's General Counsel directly and/or PMV's Head of Human Resources. All reports of known or suspected violations of the law or this Vendor Code will be handled sensitively and with discretion. The confidentiality of any reporting person will be protected to the extent possible, consistent with applicable law and the Company's need to investigate the reported concern.

In addition to contacting the Company's General Counsel, a Vendor may submit a report using the whistleblower hotline at <https://www.whistleblowerservices.com/PMVP>. This system is administered by an independent third party, and reports may be made anonymously and confidentially.

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This Vendor Code and the matters contained herein are not intended to create any new or additional rights or guarantees for any third party. We reserve the right to amend or supplement this Vendor Code and the matters addressed herein, without prior notice, at any time.