



ARVINAS, INC.

CODE OF BUSINESS CONDUCT AND ETHICS

This Code of Business Conduct and Ethics (the "Code") sets forth legal and ethical standards of conduct for employees, officers and directors of Arvinas, Inc. and its subsidiaries (the "Company"). This Code, as adopted by the Company's board of directors, is intended to:

- promote compliance with applicable governmental laws, codes, rules and regulations;
- promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
- promote fair dealing practices;
- promote the protection of Company assets, including confidential information;
- deter wrongdoing;
- promote full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the "SEC") and in other public communications made by the Company; and
- ensure accountability for adherence to the Code.

Except as otherwise required by applicable local law, this Code applies to the Company and all of its subsidiaries and other business entities controlled by the Company worldwide. All directors, officers and employees are required to be familiar with the Code, comply with its provisions and report any suspected or known violations as described below. If you have any questions regarding this Code or its application to you in any situation, you should contact your supervisor or the Company's General Counsel.

Compliance with Laws, Rules and Regulations

The Company requires that all employees, officers and directors comply with all laws, rules and regulations applicable to the Company wherever it does business. Employees, officers and directors are expected to know the details of all applicable laws, rules and regulations, and are expected to use good judgment and common sense in seeking to comply with such applicable laws, rules and regulations and to ask for advice when you are uncertain about them. Questions about compliance should be addressed to your supervisor or the Company's General Counsel.

Compliance with Company Policies

Every employee, officer and director is expected to comply with all Company policies and rules as in effect from time to time, including, but not limited to, the Employee Handbook, the Company's Anti-Discrimination, Harassment and Retaliation Policy, the Company's Insider Trading Policy, the Company's Disclosure Policy, and the other policies referenced in this Code and available



on the Company's Intranet. You are expected to familiarize yourself with such policies.

Diversity and Anti-Discrimination

Arvinas is an equal opportunity employer. In accordance with applicable law, the Company prohibits discrimination against any applicant or employee based on any legally-recognized basis, including, but not limited to: race, color, religion, sex (including pregnancy, lactation, childbirth or related medical conditions), sexual orientation, gender identity, age (40 and over), national origin or ancestry, citizenship status, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status or any other status protected by federal, state or local law. The Company's commitment to equal opportunity employment applies to all persons involved in its operations and prohibits unlawful discrimination by any employee, including supervisors and co-workers.

The Company strives to create and maintain an inclusive and civil work environment in which people are treated with dignity, decency, and respect, and the Company will not tolerate unlawful discrimination or harassment of any kind. The Company's Anti-Discrimination, Harassment and Retaliation Policy, which has been distributed and is available on the Company's Intranet or upon request from the General Counsel.

Honest and Ethical Conduct and Fair Dealing

The Company's policy is to promote high standards of integrity by conducting its affairs honestly and ethically. Each director, officer and employee must act with integrity and observe the highest ethical standards of business conduct in their dealings with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom they have contact in the course of performing their job.

Statements regarding the Company's products and services must not be untrue, misleading, deceptive or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, data or any other unfair-dealing practice.

You must also abide by any lawful obligations that you have to any former employer. These obligations may include restrictions on the use and disclosure of a former employer's confidential or proprietary information, restrictions on the solicitation of former colleagues to work at the Company and non-competition obligations.

Conflicts of Interest

Employees, officers and directors must act in the best interests of the Company. You must refrain from engaging in any activity or having a personal interest that presents a "conflict of interest" and should seek to avoid even the appearance of a conflict of interest. A conflict of interest occurs when an individual's private, or personal interest (or the interest of a member of your family), interferes, or even appears to interfere, or could be perceived with the interests of the Company as a whole. A conflict of interest can arise whenever you, as an employee, officer or director (or a member of your family) take action or have an interest that makes it difficult or prevents you from performing your Company duties and responsibilities honestly, objectively and effectively. Conflicts of interest also arise when you, as

employee, officer or director (or a member of their family), receives any benefits or opportunities which may be personal or improper in nature, including those as a result of their position in the Company.

For example:

- No employee, officer or director shall perform services as an employee, officer, director, consultant, advisor or in any other capacity for a competitor of the Company, other than services performed at the request of the Company;
- No employee, officer or director shall have a financial interest in a competitor of the Company, other than a financial interest representing less than one percent (1%) of the outstanding shares of a publicly-held company; and
- No employee, officer or director shall use his or her position with the Company to influence a transaction with a supplier or customer in which such person has any personal interest, other than a financial interest representing less than one percent (1%) of the outstanding shares of a publicly-held company.

If you have questions regarding who may be a competitor of the Company, please reach out to your supervisor or the General Counsel.

Loans by the Company to, or guarantees by the Company of obligations of, an employee or their family members are of special concern and could constitute improper personal benefits to the recipients of such loans or guarantees, depending on the facts and circumstances. Loans by the Company to, or guarantees by the Company of obligations of, any director officer or their family members are expressly prohibited.

Whether or not a conflict of interest exists or will exist can be unclear. Conflicts of interest should be avoided unless specifically authorized as described in this Code. As an employee, if you have questions about a potential conflict of interest or become aware of an actual, perceived or potential conflict, it is your responsibility to discuss the matter with and seek prior authorization or approval from the General Counsel. Executive officers or directors must seek determinations and prior authorizations or approvals of potential conflicts of interests exclusively from the Board of Directors.

Insider Trading

Employees, officers and directors who are in possession of material non-public information about the Company or other companies, including the Company's suppliers and customers, partners or collaborators, as a result of their relationship with the Company, are prohibited by law and Company policy from trading in securities of the Company or such other companies, as well as from communicating such information to others who might trade on the basis of that information. To help ensure that you do not engage in prohibited insider trading and avoid even the appearance of an improper transaction, the Company has adopted an Insider Trading Policy, which has been distributed to you and is available on the Company's Intranet or upon request from the General Counsel.

If you are uncertain about the constraints on your purchase or sale of any Company securities or the securities of any other company that you are familiar with by virtue of your relationship with the Company, you should consult with the General Counsel before making any such purchase or sale.

Confidentiality and Disclosure

All information and know-how, whether or not in writing, of a private, secret or confidential nature concerning the Company's business or financial affairs (collectively, "Proprietary Information") is and shall be the exclusive property of the Company. By way of illustration, but not limitation, Proprietary Information may include discoveries, inventions, products, product improvements, product enhancements, processes, methods, techniques, formulas, compositions, compounds, trade secrets, patents, trademarks, and copyrights, negotiation strategies and positions, projects, developments, plans (including business and marketing plans), research data, clinical data, non-public financial data (including sales costs, profits, pricing methods), computer programs (including software used pursuant to a license agreement), customer, prospect and supplier lists, and contacts at or knowledge of customers or prospective customers of the Company.

Employees, officers and directors must maintain the confidentiality of Proprietary Information entrusted to them by the Company or other companies, including the Company's partners, suppliers and customers, except when disclosure is expressly authorized or required or permitted by law, including as further outlined in the bold language below in "Reporting and Compliance Procedures". Unauthorized disclosure of any Proprietary Information is prohibited and could also be illegal and result in civil or criminal penalties. Additionally, employees should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company, is not communicated within the Company except to employees who have a need to know such information to perform their responsibilities for the Company. Employees and officers' obligations related to confidentiality are also outlined in a Proprietary Information and Assignment Agreement.

Third parties may ask you for information concerning the Company. Subject to the exceptions noted in the preceding paragraph and the bold paragraph included in "Reporting and Compliance Procedures", employees, officers and directors (other than the Company's authorized spokespersons as outlined in the Company's Disclosure Policy) must not discuss Proprietary Information with, or disseminate Proprietary Information to, anyone outside the Company, except as required in the performance of their Company duties and, if appropriate, after a confidentiality agreement is in place. This prohibition applies particularly to inquiries concerning the Company from the media, market professionals (such as securities analysts, institutional investors, investment advisers, brokers and dealers) and security holders. All responses to inquiries on behalf of the Company must be made only by the Company's authorized spokespersons. If you receive any inquiries of this nature, you must decline to comment and refer the inquirer to your supervisor or one of the Company's authorized spokespersons. The Company's policies with respect to public disclosure of internal matters are described more fully in the Company's Disclosure Policy, which is available on the Company's Intranet or upon request from the General Counsel.

Protection and Proper Use of Corporate Assets; Corporate Opportunities

Subject to the disclosure exceptions noted in the section above and in the bold paragraph included in “Reporting and Compliance Procedures”, employees, officers and directors should seek to protect the Company’s assets, including Proprietary Information, and seek to ensure their efficient use. Theft, carelessness and waste may have a direct impact on the Company’s financial performance. Employees, officers and directors must use the Company’s assets, property, information, facilities and services solely for legitimate business purposes of the Company and not for any personal benefit or the personal benefit of anyone else. Any suspected incident of fraud or theft should be reported for investigation immediately.

Employees, officers and directors should advance the Company’s legitimate interests when the opportunity to do so arises. You must not take for yourself (or for the benefit anyone other than the Company) personal opportunities that are discovered through your position with the Company or the use of assets, property or information of the Company. Directors, officers and employees may not use Company assets, property, information or position for improper personal gain (including gain of friends or family members).

No Bribes or Kickbacks

The Company does not permit or condone bribes, kickbacks or other improper payments or receipts. You must not offer, give, solicit, or receive any form of bribe or kickback anywhere in the world.

Employees, officers, and directors must not offer or accept, directly or indirectly through third parties, any payments, benefits, or anything of value to influence decisions, obtain or retain business, or secure any improper advantage. There are many laws that prohibit bribery and corruption in business transactions around the world, including, the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. These laws apply not only to our Company, but also to all agents or third parties working on our behalf. Failure to comply with these laws can expose individuals and the Company to significant fines and/or criminal charges. To comply with these laws, you are expected to understand and adhere to the Company’s Anti-Corruption Policy, which has been distributed to you and is available on the Company’s Intranet or upon request from the General Counsel.

Gifts and Gratuities

Employees, officers, and directors must be careful to avoid even the appearance of impropriety in giving or receiving gifts and meals to government officials or with existing or potential customers, suppliers, partners or any other person doing or seeking to do business with the Company. To avoid these concerns, employees, officers and directors must adhere to the following:

- Gifts of any kind, including personal gifts, must not be provided to Healthcare Professionals (HCP) or their family members. Company policies governing interactions with HCPs must be followed.

- Other gifts or entertainment may be given only where there is no risk of creating the perception of influencing the recipient's decision in relation to a business transaction.
- Gifts, hospitality, meals, and entertainment must be modest, reasonable, and infrequent, as consistent with customary business practice.
- Demanding or soliciting gifts or entertainment of any kind is prohibited.

Any inappropriate gifts should be returned, if possible, with an explanation as to why you cannot accept it, as well as be reported to your manager.

Accuracy of Books and Records and Public Reports

Employees, officers and directors must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. Accurate information is essential to the Company's ability to meet legal and regulatory obligations.

All Company books, records and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The financial statements of the Company shall conform to generally accepted accounting rules and the Company's accounting policies. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation.

It is the policy of the Company to provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the SEC and in other public communications.

Quality Standards and Reporting

It is the policy of the Company to comply with applicable laws, regulations, and standards aimed at product safety, efficacy, and quality including Good Laboratory, Clinical, Vigilance, Distribution, and Manufacturing practices including requirements for handling and reporting adverse reactions. Third party contractors are expected to abide by these same practices and provide oversight to ensure quality. Employees, officers and directors are all required to report any concerns that may be associated with the use of Arvinas products using the appropriate resources. The Company protects patient safety by identifying, assessing, and managing any product related risks in a timely manner. The Company's policies related to quality standards and reporting are available upon request from your supervisor or the General Counsel.

Concerns Regarding Accounting or Auditing Matters

Employees with concerns regarding questionable accounting or auditing matters or complaints regarding accounting, internal accounting controls or auditing matters may confidentially, and anonymously if they wish, submit such concerns or complaints in writing to **the Company's General Counsel at Arvinas, Inc., 5 Science Park, 395 Winchester Ave, New Haven, CT 06511, or may use the toll-free telephone number 1-866-270-3699, the email address**

Compliance@Arvinas.com or the website: www.openboard.info/ARVN/. While it is the Company's desire to address such matters internally, no provision of this Code or of any other agreement or Company policy prohibits you from engaging in a Permitted Activity (as defined in the bold language in "Reporting and Compliance Procedures"), without prior notice or reporting to the Company. See "Reporting and Compliance Procedures." All such accounting and auditing matters or concerns and complaints using this internal process will be forwarded to the Audit Committee of the Board of Directors, unless they are determined to be without merit by the General Counsel of the Company. In any event, a record of all complaints and concerns received will be provided to the Audit Committee each fiscal quarter. Any such concerns or complaints may also be communicated, confidentially and, if you desire, anonymously, directly to the Chairperson of the Audit Committee of the Board of Directors.

The Audit Committee will evaluate the merits of any concerns or complaints received by it and authorize such follow-up actions, if any, as it deems necessary or appropriate to address the substance of the concern or complaint.

The Company will not discipline, discriminate against or retaliate against any employee who reports a complaint or concern, unless it is determined that the report was made with knowledge that it was false.

Dealings with Independent Auditors

No employee, officer or director shall, directly or indirectly, make or cause to be made a materially false or misleading statement to an accountant in connection with (or omit to state, or cause another person to omit to state, any material fact necessary in order to make statements made, in light of the circumstances under which such statements were made, not misleading to, an accountant in connection with) any audit, review or examination of the Company's financial statements or the preparation or filing of any document or report with the SEC. No employee, officer or director shall, directly or indirectly, take any action to coerce, manipulate, mislead or fraudulently influence any independent public or certified public accountant engaged in the performance of an audit or review of the Company's financial statements.

Waivers of this Code of Business Conduct and Ethics

While some of the policies contained in this Code must be strictly adhered to and no exceptions can be allowed, in other cases exceptions may be appropriate. Any employee or officer who believes that a waiver of any of these policies is appropriate in his or her case should first contact his or her immediate supervisor. If the supervisor agrees that a waiver is appropriate, the approval of the General Counsel must be obtained. The General Counsel shall be responsible for maintaining a record of all requests by employees or officers for waivers of any of these policies and the disposition of such requests.

Any executive officer or director who seeks a waiver of any of these policies should contact the General Counsel. Any waiver of this Code for executive officers or directors or any change to this Code that applies to executive officers or directors may be made only by the Board of Directors of the Company and will be disclosed as required by SEC and Nasdaq rules.

Reporting and Compliance Procedures

Every employee, officer and director has the responsibility to ask questions, seek guidance, report suspected violations of law or this Code and express concerns regarding compliance with law or this Code. While it is the Company's desire to address matters internally, no provision of this Code or of any other agreement or Company policy prohibits you from engaging in a Permitted Activity (as defined below), without prior notice or reporting to the Company. Any employee, officer or director who knows or believes that any other employee or representative of the Company has engaged or is engaging in Company-related conduct that violates applicable law or this Code is encouraged to report such information to his or her supervisor or to the General Counsel. Any supervisor who receives a report of a violation of this Code must immediately inform the General Counsel.

You may also report suspected violations of this Code, any allegations of unlawful or unethical behavior or misconduct on a confidential or anonymous basis, by contacting **the Company's General Counsel at Arvinas, Inc. 5 Science Park, Winchester Ave., New Haven, CT 06511 or by email at Compliance@Arvinas.com or the website: www.openboard.info/ARVN/**. In addition, the Company has established a toll-free telephone number **1-866-270-3699** where you can leave a recorded message about any violation or suspected violation of law or this Code. While we prefer that you identify yourself when reporting suspected violations so that we may follow up with you, as necessary, for additional information, you may leave messages anonymously if you wish.

If you become aware of the violation of any law, rule or regulation by the Company, whether by its employees, officers, directors, or any third party doing business on behalf of the Company, it is your responsibility to promptly report the matter to your supervisor or to the General Counsel. The Company values your timely voice in ensuring Arvinas is upholding its legal and ethical obligations in which we embrace a speak up culture with our employees. The Company does not tolerate acts of retaliation against any employee, officer or director who makes a good faith report of known or suspected acts of misconduct or other violations of this Code. The Company will not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against an employee because such employee reported a possible or actual violation of law or this Code internally or engaged in a Permitted Activity (as defined below). However, if the report was made with knowledge that it was false, the Company may take appropriate disciplinary action up to and including termination.

Notwithstanding the provisions above, nothing in this Code or any other agreement or Company policy prohibits or restricts you from (i) communicating with government agencies without notice to or approval from the Company, including but not limited to the SEC, the Equal Employment Opportunity Commission, or similar state or local agencies or to any legislative body or self-regulatory organization (each, a "Government Entity") about possible or actual violations of the law, or otherwise providing information to a Government Entity, filing a charge or complaint with a Government Entity, or participating, testifying, or otherwise assisting in Government Entity investigations or proceedings without notice to or approval from the Company, or (ii) making disclosures or communications to engage in protected, concerted activity or otherwise exercising rights under Section 7 of the National Labor Relations Act (each, a "Permitted Activity").

It is the Company's policy to ensure prompt and consistent action against violations of law and/or this Code. If the General Counsel receives information regarding an alleged violation of this Code, he or she shall, as appropriate, (a) evaluate such information, (b) if the alleged violation involves an executive officer or a director, inform the Chief Executive Officer and Board of Directors of the alleged violation, (c) determine whether it is necessary to conduct an informal inquiry or a formal investigation and, if so, initiate such inquiry or investigation and (d) report the results of any such inquiry or investigation, together with a recommendation as to disposition of the matter, to the Chief Executive Officer for action, or if the alleged violation involves an executive officer or a director, report the results of any such inquiry or investigation to the Board of Directors and/or a committee thereof. Employees, officers and directors are expected to cooperate fully with any inquiry or investigation by the Company regarding misconduct or an alleged violation of law or this Code. Failure to cooperate with any such inquiry or investigation may result in disciplinary action, up to and including termination of employment.

The Company shall determine whether violations of this Code have occurred and, if so, shall determine the disciplinary measures to be taken against any employee who has violated this Code. In the event that the alleged violation involves an executive officer or a director, the Chief Executive Officer and the Board of Directors, respectively, shall determine whether a violation of this Code has occurred and, if so, shall determine the disciplinary measures to be taken against such executive officer or director.

Failure to comply with the standards outlined in this Code will result in preventative or disciplinary action including, but not limited to, reprimands, warnings, probation or suspension without pay, reassignment, demotions, reductions in salary, dismissal and demands and/or claims for restitution. The Company may refer any apparent violation of law to the appropriate governmental or regulatory authorities for investigation or prosecution. Moreover, any supervisor who directs or approves of any conduct in violation of law or this Code, also will be subject to disciplinary action, up to and including termination.

Dissemination and Amendment

This Code shall be distributed to each new employee, officer and director of the Company upon commencement of his or her employment or other relationship with the Company and shall also be distributed annually to each employee, officer and director of the Company, and each employee, officer and director shall certify that he or she has received, read and understood the Code and has complied with its terms.

The Company reserves the right to amend, alter or terminate this Code at any time for any reason. The most current version of this Code can be found on the Company's Intranet, the "Investors and Media" section of the Company's website www.arvinas.com, or may be obtained from the General Counsel.

This document is not an employment contract between the Company and any of its employees, officers or directors.

Last Updated : September 25, 2024



Certification

I, _____ do hereby certify that:

(Print Name Above)

I have received and carefully read the Code of Business Conduct and Ethics of Arvinas, Inc.

I understand the contents of the Code of Business Conduct and Ethics.

I have complied and will continue to comply with the terms, policies and procedures set out in the Code of Business Conduct and Ethics.

Except as noted below, I do not know or believe that any employee or representative of the Company has engaged or is engaging in Company-related conduct that violates applicable law or the Code of Business Conduct and Ethics.

Exceptions (describe, or state "None"):

Date:

(Signature)

EACH EMPLOYEE, OFFICER AND DIRECTOR IS REQUIRED TO SIGN, DATE AND RETURN THIS CERTIFICATION TO THE LEGAL DEPARTMENT WITHIN 10 DAYS OF ISSUANCE. FAILURE TO DO SO MAY RESULT IN DISCIPLINARY ACTION.



SUSPECTED VIOLATIONS SHOULD BE REPORTED TO

Email: Compliance@Arvinas.com

Website: www.openboard.info/ARVN/

Phone Number: 1-866-270-3699