



Whistleblower policy

Adopted by the Board of Directors on 22 May 2025

Purpose

Innate Pharma S.A. (together with its subsidiaries, “Innate Pharma” or the “Company”) is committed to complying with all applicable laws governing its business. As part of the Company's ongoing commitment to reinforce its ethical commitments and to provide easily accessible tools for anyone to report an inappropriate situation or a situation that does not comply with the Company's values or applicable laws and regulations, Innate Pharma has set up a whistleblowing system available to its employees and all its stakeholders.

Law of 21 March 2022 (which came into force on 1 September 2022) modified the whistleblower protection system introduced by the Sapin II Law.

The Board of Directors established these procedures to facilitate the reporting of such alerts. The procedures govern (i) the receipt, retention and treatment of alerts, and (ii) their confidential and anonymous submission.

The policy is a supplement to the Code of Ethics of Innate Pharma (PG-7789). The Company's commitment to encouraging alerts, its policy of non-retaliation, and its reporting hotline – all discussed below – apply equally to all sorts of violations of Innate Pharma's Code of Ethics and other violations of law or policy.

The Compliance Officer, reachable at compliance@innate-pharma.fr, is responsible for administering this policy. The Compliance Officer is also responsible for receiving and reviewing whistleblower reports, and, where appropriate, conducting or coordinating further investigations in accordance with this policy.

This policy does not prevent employees from raising their concerns directly with their line manager, where applicable.

Unless otherwise stated, capitalized terms used in this policy have the meaning given to them in the Innate Pharma's Code of Ethics.

Whistleblower status

For the purposes of this policy, any natural person may be considered a whistleblower ("Whistleblower"), including but not limited to the following individuals:

- Staff members;
- External and occasional collaborators;
- Persons whose employment relationship has ended (for facts of which they became aware of during this employment relationship);
- Persons applying for a job (for facts of which they have knowledge in the context of this application);
- Shareholders, associates, holders of voting rights at the General Meeting;
- Members of the Board of Directors and the Executive Leadership Team; or
- Co-contractors, subcontractors, as well as members of their staff, administrative, executive or supervisory bodies, and their collaborators.

Scope of matters covered

This policy covers alerts made by the Whistleblower, without direct financial compensation and in good faith, on facts he or she has knowledge concerning:

- The existence of a felony (crime or délit);
- A violation or an attempt to conceal a violation of the law, a regulation, an international commitment duly approved and ratified by the French Republic, a unilateral act of an international organization taken on the basis of such commitment;
- A threat or prejudice to public interest: in the professional context, it is not necessary to have had personal knowledge of the facts; or
- Innate Pharma's Code of ethics (PG-7789), anti-corruption policy (PG-12418) and the market ethics charter (PG-8153).

In particular with respect to accounting or auditing matters, it covers alerts with respect to:

- The preparation, evaluation, review, or audit of Innate Pharma's financial statements;
- The recording and maintaining of Innate Pharma's financial records;
- Innate Pharma's internal accounting controls;
- Statements to management, regulators, outside auditors, or others by a senior officer, accountant, or other employee regarding a matter contained in Innate Pharma's financial records, financial reports, or audit reports; or
- The requirement to provide full and fair reporting of our results, business or financial condition.

Protection and guarantees of the Whistleblower

The Company strictly prohibits retaliation, harassment, discrimination or threats of any kind against anyone who makes an alert in good faith and will abide by all laws that prohibit retaliation against employees who lawfully submit alerts as well as against anyone participating in the investigation of such an alert solely because they participated and in particular :

- Any action that has an impact on recruitment, contract renewal, internship, training;
- A sanction, a dismissal;
- Discrimination regarding compensation, profit-sharing, distribution of shares, reclassification, assignment, qualification, promotion or transfer;
- Suspension, layoff, demotion, salary reduction;
- A change in job function, location or work schedule;
- A negative performance evaluation;
- Disciplinary action, reprimand, intimidation, harassment;
- Non-conversion of a temporary employment contract to a permanent contract;
- Damage to reputation; or
- Blacklisting, cancellation or termination of a contract.

Protection is also extended to:

- Any natural person related to the Whistleblower, who is at risk of retaliation in his/her professional activity (colleagues, spouses, neighbors...);
- Facilitator, that is any natural person or any private non-profit legal entity that helps to make the alert or disclosure (trade unions, non-profit associations, etc.).

In case of anonymous reporting, the Whistleblower whose identity is revealed later benefits from the same protections.

Any person who believes that he or she has suffered retaliation or the threat of retaliation should report it to the Compliance Officer, who will take appropriate corrective action.

Although it is highly recommended that an alert be made in compliance with the whistleblowing procedures contained in this policy, it is not mandatory and will have no consequences (e.g., discipline) if an alert is not made.

The Company undertakes to:

- Guarantee the integrity and confidentiality of the information collected in an alert, in particular the author's identity, the persons concerned by the alert and any third party mentioned in the alert;
- Prohibit access to such information by staff who are not authorized to know it; and
- Provide for the prompt transmission of alerts received by other persons or services to the competent persons or services.

Information collected in the context of an internal alert may only be communicated to third parties if such communication is necessary to process the alert.

Information which could identify the Whistleblower may only be disclosed with his or her consent, except to the judicial authority when the persons responsible for collecting and processing the alerts are obliged to report the facts to the judge. In this case, the Whistleblower shall be informed of such disclosure to the judicial authority, unless such information would jeopardize the judicial proceedings.

Reporting

Any questions relating to this policy should be addressed in the first instance to your line manager. He or she may have the necessary information or be able to refer the matter to another appropriate source. However, any concerns can also be discussed with the Compliance Officer.

- **Internal reporting**

Any alert covered by this policy may be reported internally. The Company encourages anyone making an alert to reveal their identity. However, for those who wish to report but wish to do so anonymously, the Company has implemented alternative procedures.

- *Non-anonymous reporting*

Any alert made by a person who does not wish to remain anonymous should be reported to the Compliance Officer, either directly or by e-mail to compliance@innate-pharma.fr.

If the suspected violation involves the Compliance Officer, it should be reported to the Chief Executive Officer.

- *Anonymous reporting*

There is also a procedure for anonymous reporting.

Employees can report behavior that falls within the scope of this policy by:

- sending an e-mail to compliance@innate-pharma.fr;
- calling our Compliance Officer, with the option of leaving a voice message on +33484903095;
- delivering the complaint via regular mail to the Compliance Officer at c/o Innate Pharma S.A., 117 Avenue de Luminy – BP 30191, 13009 Marseille, France; and
- via the Contact form on the Innate Pharma website in the "Ethics and Compliance" category: [Contact | Innate Pharma \(innate-pharma.com\)](https://www.innate-pharma.com).

Innate Pharma will, in accordance with French law, only follow up on an anonymous alert if both of the following conditions are met: (i) the seriousness of the alleged facts underlying the alert has been established and such facts are sufficiently detailed; and (ii) additional precautions are taken when processing the alert in order to avoid the potential disclosure of information that could be based on false allegations (e.g., by a preliminary analysis by the Compliance Officer).

In accordance with Section 301 of the Sarbanes-Oxley Act, the Company, as a Nasdaq-listed company, ensures that employees have the ability to report, confidentially and anonymously, any concerns relating to accounting, internal controls, or auditing matters. Such reports are

forwarded directly to the Audit and Sustainability Committee, in compliance with applicable regulatory requirements.

Employees, or, as the case may be, other third parties, such as consultants or vendors, should make every effort to report their concerns using one or more of the methods specified above. This alert procedure is specifically designed so that employees have a mechanism that allows the employee to bypass a supervisor he or she believes is engaged in prohibited conduct under this policy. Anonymous alerts should be factual, instead of speculative or conclusory, and should contain as much specific information as possible to allow the Compliance Officer and other persons investigating the alert to adequately assess the nature, extent and urgency of the investigation.

- **External Reporting**

The Whistleblower can choose to report externally to one of the 45 competent authorities listed by the Decree 022-1284 of 3 October 2022, to the Human Rights Defender who will direct him/her to the competent authority, or to the judicial authority. The processing of an external alert is done within three months by the authorities mentioned in the preceding sentence.

If an external alert has been made in good faith, concerning any matter covered by this policy, a possible violation of law, policy or any of the other matters mentioned above, including accounting, auditing, it is recommended that it also be reported internally promptly.

Other third parties, such as consultants or suppliers, may also report in compliance with this policy.

- **Public Reporting**

Public disclosure is only possible in these situations:

- The external alert has not been dealt with within three months from the date of the alert (this period may be extended to six months under the conditions of Article 10 of Decree 2022-1284 of 3 October 2022);
- In the event of serious and imminent danger;
- If referring the matter to the competent authority would expose the Whistleblower to a risk of reprisals or if the alert has no chance of success;
- If the Whistleblower has substantial grounds for believing that the competent authority may be in conflict of interest or acting in collusion with the author of the facts; or
- If there is a clear danger to the public interest, emergency situation or risk of irreversible harm.

Receiving and investigating alerts

The Whistleblower is informed in writing of the receipt of his/her alert within 7 working days of its receipt.

The Whistleblower may be asked, at the same time as making the alert, to provide any evidence that he or she can be considered as a Whistleblower (see above).

Upon the Whistleblower's request, a video conference or a physical meeting can be organised to submit the alert. In this case, it must be arranged no later than 20 working days after receipt of the request. The oral alert must be properly recorded in minutes. Similarly, the Whistleblower must have the opportunity to check, correct and approve the transcript or minutes.

After receiving an alert, the Compliance Officer will determine whether the alleged information pertains to an accounting or audit matter. The Compliance Officer will promptly notify the Audit and Sustainability Committee of all alerts related to an accounting or audit matter.

With respect to notification to the Audit and Sustainability Committee, initially, the Audit and Sustainability Committee will determine if there is an adequate basis for an investigation. If so, the Compliance Officer will appoint one or more investigators to promptly and fully investigate any claims under the direction and oversight of the Audit and Sustainability Committee. The Audit and Sustainability Committee may also appoint others to oversee the investigation. If the reporting person identified himself, the Compliance Officer will also confidentially tell the reporting person that the alert was received and whether an investigator has been assigned. The reporting person will be given the investigator's name and contact information.

Alerts regarding matters other than accounting or audit matter will be investigated by the Compliance Officer (or another appropriate department as warranted) and notified to the Board of Directors, depending on the conclusions of the Compliance Officer's investigation.

The Whistleblower's confidentiality will be maintained to the fullest extent possible consistent with the need to conduct an adequate investigation. Innate Pharma may find it necessary to share information on a "need to know" basis in the course of any investigation, with the prior consent of the reporting person if legally required.

If the investigation confirms that a violation has occurred, Innate Pharma will promptly take appropriate corrective action against the persons involved. This may include termination. The matter may also be referred to judicial, administrative authorities or other professional orders that may investigate and initiate civil or criminal proceedings.

Within a reasonable period of time not exceeding 3 months from the receipt of the alert or, 3 months from the expiry of a period of 7 working days following the alert, the Whistleblower shall be informed in writing of the measures envisaged or taken to assess the accuracy of the allegations and, if necessary, change the subject of the alert and the reasons for the latter.

Retention of alerts

The Compliance Officer will maintain a log of all alerts covered by this policy, tracking their receipt, investigation, and resolution. The Compliance Officer will prepare a periodic report for each member of the Audit and Sustainability Committee, as to alerts regarding accounting and auditing matters and the Board of Directors, with respect to all other alerts. Each member of the Audit and Sustainability Committee and the Board of Directors, respectively, will have access to the log, and the Compliance Officer may provide access to the log to other personnel involved in the investigation of alerts. Copies of the log and all documents obtained or created in connection with any investigation will be maintained in accordance with this policy addressing French law or, failing that, any established document retention policy.

If the alert is not followed by a disciplinary or judicial procedure, the data related to the alert will be destroyed or archived, after anonymization, within two months following the end of the

investigation. If the alert is followed by a disciplinary or judicial procedure, the data related to the alert will be retained for the whole duration of the procedure, and archived for the applicable, prescribed periods. However, if a legal retention obligation applies (in particular in accounting matters, pursuant to the Sarbanes-Oxley Act or SEC regulations), such data may be retained for a longer period, in compliance with applicable rules.

Transfers of personal data outside of the European Union

The personal data collected in the framework of the whistleblowing system may be transferred outside of the European Union, to the United States, for the purpose of receiving and investigating alerts, in accordance with applicable data protection rules.

Rights of individuals identified in the framework of the whistleblowing system

Any identified person within the framework of the whistleblowing system may access, correct, limit or object to the processing or investigation of his or her personal data for legitimate reasons, in compliance with the applicable law. He or she also has the right to provide post-mortem instructions. These rights can be exercised by contacting the Compliance Officer or directly the Data Protection Officer (e-mail: dpo@innate-pharma.fr) of Innate Pharma.

Training and communication

The Company is committed to ensuring regular communication about the existence of this policy, the available reporting channels, and the rights of Whistleblowers. Specific training sessions will be organized for employees and, where appropriate, external stakeholders, in order to promote a culture of ethics, transparency, and non-retaliation. In addition, the policy is available on the Company's website at the following address: <https://www.innate-pharma.com>.