Nuvalent Compliance Program

With deep expertise in chemistry and structure-based drug discovery, Nuvalent is creating **precisely targeted therapies** for patients with cancer. Nuvalent believes in the highest ethics and integrity standards and maintains an effective and comprehensive corporate compliance program in furtherance of those standards.

Nuvalent has implemented a program that includes areas covered by the May 2003 Office of Inspector General (OIG) “Compliance Program Guidance for Pharmaceutical Manufacturers (“OIG Guidance”) and the Pharmaceutical Research and Manufacturers of America (PhRMA) Code on Interactions with Healthcare Professionals (“PhRMA Code”). The OIG Guidance gives broad discretion to manufacturers in the development, design, and definition of scope of a compliance program. Nuvalent will regularly review and modify our Compliance Program to meet evolving compliance needs and may be amended or revised from time to time.

Our Compliance Program will assist the Company in maintaining compliance with the laws, regulations, and company guidance and frameworks to meet the highest standards of corporate conduct. Nuvalent trains our employees in these important areas and works to prevent, detect, and correct instances of non-compliance. Nuvalent expects all employees, contractors and directors to comply with applicable policies, procedures, guidance, and the laws, regulations, and health care program requirements. If Nuvalent becomes aware of non-compliance, we will investigate the matter and, where appropriate, take disciplinary or corrective action to prevent future non-compliance.

Key elements of our Compliance Program include, but are not limited to:

1. Leadership and Structure

Nuvalent’s Chief Compliance Officer has authority related to compliance matters and shall exercise independent judgment. The Chief Compliance Officer makes reports to the Board of Directors and, through his or her designee(s), has oversight for compliance policies, procedures, and all compliance operational matters.

2. Written standards

Nuvalent has a Code of Business Conduct & Ethics (revised annually) and has adopted the U.S. PhRMA Code on Interactions with Healthcare Professionals (version dated January 2022). Nuvalent also has policies, procedures, and practices that guide the Company and the conduct of daily operations.

3. Annual Spending Limit

Nuvalent has established limits on gifts, meals and other activities with health care professionals. For purposes of complying with California Health and Safety Code §§ 119402, Nuvalent has established a maximum annual aggregate dollar limit for gifts, promotional materials or activities provided to California health care professionals.

4. Education and Training

Nuvalent is committed to developing and providing a variety of compliance training to address a range of potential risk areas associated with pharmaceutical manufacturers and healthcare programs. Training may include in-person, asynchronous, and/or other effective learning modalities. All new hires receive a compliance training curriculum, and all employees receive compliance training at least annually. Specific compliance training on focused topics or key areas is conducted periodically throughout the year.

5. Lines of Communication

We expect all Nuvalent employees, contractors, and directors to promptly report suspected, planned, or actual violations of our policies, guidelines, and/or laws that govern our activities. Reports may be made to a manager, our Human Resources group, or directly to the Legal & Compliance Office. Anonymous reports can be made by calling 1-855-560-3192 or https://www.whistleblowerservices.com/nuvalent.

We also encourage our employees, contractors, and directors to ask questions about any activity or concern that may involve a potential violation or application of our Compliance Program. Questions may be posed through any of the above communication lines. Nuvalent will never retaliate against an individual who reports in good faith a potential, suspected, planned or actual violation.

6. Risk Assessment, Auditing & Monitoring

Risk Assessments, auditing and monitoring are intended to identify potential or existing areas that involve compliance matters such that corrective action measures and steps may be taken to prevent the recurrence of non-compliance. Each year, an annual work plan and risk assessment will be established. Compliance reviews, audits, or monitoring may vary; however, all these activities will be conducted with a critical focus on key and emerging risk areas, issues, or in response to new legal, regulatory, or industry aspects.

7. Enforcement, Discipline & Corrective Action

Adherence to the Code of Business Conduct & Ethics is required for all employees, contractors, and directors. Any violation of one's obligations under the Code can subject the individual to serious disciplinary measures, up to and including termination of employment. Nuvalent is committed to ensuring appropriate and consistent disciplinary action in response to compliance violations. Each situation is unique; however, any corrective action measures will also include review and determination if additional changes may be needed to our policies, practices, training, or other control frameworks to prevent future non-compliance.