

## **General**

We expect our employees to promote our core values by acting responsibly towards colleagues, business associates and society at large; and to take into consideration that when acting outside Sobi, they are legitimately regarded as Sobi employees and representatives of the company.

The Sobi Code of Conduct & Ethics provides a framework for what Sobi considers to be responsible and appropriate conduct. Our employees should always strive to exercise good judgment, care and consideration in their work for Sobi.

## **Scope and responsibility**

The Sobi Code of Conduct & Ethics applies to all Sobi employees, temporary personnel, consultant, agents or anyone working on behalf of Sobi. Everyone is required to confirm that they have read and understood the Code of Conduct & Ethics. Line managers are responsible for making these guidelines known and for promoting and monitoring compliance. Violation of this Code of Conduct & Ethics will not be accepted and may result in formal sanctions being applied, according to the nature and severity of the breach, and according to all applicable laws and regulations.

## **Aim of the Sobi Code of Conduct & Ethics**

This Code of Conduct & Ethics is intended to assist the organisation in contributing to Sobi's sustainable development. It recognises that compliance with law and relevant regulation when conducting business on behalf of Sobi is a fundamental duty and an essential part of the responsibility of each and every employee.

Issues regarding social and sustainable entrepreneurship are central to the whole world and also play an increasingly important role in corporate competitiveness, profitability and, hence, stakeholder and shareholder value.

In order to respect human rights, promote fair employment, safe working conditions, environmental responsibility and high ethical business standards, the Code of Conduct & Ethics is to be applicable globally in the production, supply and support of all Sobi products and services.

Specifically:

### **1. PRODUCT SAFETY & QUALITY**

Patient safety is the highest priority for Sobi. In our research, development, manufacture, storage, distribution and post-marketing activities, we will comply with all applicable laws and regulations, including reporting of safety information designed to ensure the safety and quality of pharmaceutical products. We also will always adhere to our internal policies and standard operating procedures designed to protect patient safety and to ensure quality of our products.

## **2. ADVERTISEMENTS / PROMOTION**

Sobi is committed to complying with all applicable laws, regulations and industry codes governing promotional activities and advertising and will conduct these activities in an appropriate and ethical manner.

We will follow applicable company procedures designed to ensure that our promotional information and advertisements comply with regulatory requirements and are accurate, balanced, fair, supported by scientific evidence and are not false or misleading.

We will not promote our products for a specific use in a country until the requisite approval for marketing for that use has been given in that country.

## **3. RELATIONSHIPS WITH HEALTHCARE PROFESSIONALS**

Sobi is committed to complying with all applicable laws, regulations, and industry codes, including codes established by regional and local industry associations, in interacting with healthcare professionals.

We will not provide, offer, or promise any money, goods, hospitality, gift or any other item of value to induce or reward favourable treatment of our products.

When we obtain consulting services, advisory board services, or any other services from healthcare professionals, we will have a legitimate business need and we will not pay more than an appropriate market value for the services rendered.

## **4. ANTI-CORRUPTION / ANTI-BRIBERY**

Sobi should work against corruption in all its forms, including extortion and bribery.

Sobi employees will comply with all applicable laws and regulations prohibiting bribery of government officials as well as all applicable laws and regulations prohibiting bribery of foreign government officials.

In some countries, employees of hospitals or other institutions providing public services, or funded, or regulated by government entities are deemed to be government officials for the purpose of anti-bribery laws.

We will not provide, offer or promise any bribe (including money, goods, hospitality, gifts or any other item of value), directly or indirectly, to government officials or foreign government officials. In addition, we will not provide any payment or benefits to private sector employees to influence them to obtain or retain a business advantage.

We will also ensure that those who act on our behalf, such as our agents, will not engage in corrupt practices.

## **5. PROCUREMENT**

We will not have any motives for purchasing from a given supplier other than those that meet Sobi's needs in the best possible way. We will ensure that purchasers and others participating in the procurement activities will be independent of the supplier.

Sobi employees who work with purchasing will contribute to and work for honesty, reliability and professionalism in our contacts with suppliers and subcontractors.

Purchasers and others participating in the purchasing process and others in contact with suppliers will not inform third parties about competitive prices and other conditions.

All kinds of purchasing activities will comply with all applicable laws, statutes and related regulations in all the markets where we are active. Purchasers and others in the purchasing chain will never participate in contexts where some form of illegal cooperation exists, where competition is limited, such as joint pricing decisions, including production quotas, etc. Sobi employees will cooperate with all relevant authorities in such matters.

## **6. COMPETITION & ANTI-TRUST**

We will comply with all applicable competition and anti-trust laws in all countries where we do business. In particular, we will adhere to the following:

- (i) We will not exchange information with competitors on pricing, outputs, capacity, customer selection, or exchange any other competitive information, and will not enter into any agreements on those matters (such as price fixing, market allocation, and bid rigging).
- (ii) We will not participate in trade association meetings or other meetings with competitors where we anticipate that such exchange of information or agreements will be requested. If a competitor raises any such issues, we will stop the conversation or ask the meeting chair or meeting facilitator to stop the conversation and, if the conversation does not stop, we will leave the meeting immediately. In the event of such a conversation, we will consult with the Legal Department at our location or our legal counsel immediately.
- (iii) We will not impose unlawful resale price restrictions on wholesalers, distributors, licensees, sales agencies or any other party.

## **7. INTERNATIONAL TRADE CONTROLS**

We will comply with all applicable laws and regulations in exporting and importing products, materials, machinery, technology and other items. In particular, in some countries, exportation of goods or technologies is tightly controlled by the government due to national security concerns. Employees responsible for exportation and/or importation of goods or technologies will familiarise themselves with these laws and regulations.

## **8. PROTECTION OF ASSETS / INFORMATION**

We will protect Sobi's money, property and other assets and will use them solely for the purpose of carrying out our duties to Sobi and will not misappropriate or embezzle these for ourselves or for any third party.

We will not claim or allow any fraudulent expense reimbursement.

In addition, we will promote appropriate and effective use of computers and other IT systems and will not use them unlawfully or inappropriately or for personal use, other than any incidental use permitted by applicable company policies. We will not install on our computer any unauthorised software or device, such as file-sharing software, which has a risk of inadvertently disclosing information to third parties.

## **9. CONFIDENTIAL INFORMATION / INTELLECTUAL PROPERTY**

- (i) Confidential information: During and after employment, we will keep confidential and protect all confidential information, including trade secrets and business or technical information about Sobi and its products, and we will not improperly disclose such information to any third party, nor will we use such information for any purpose other than performance of our duties to Sobi. Even within Sobi, we will not use such information for any purpose other than performance of our duties and will not disclose such information to any person other than those who need to know such information for the performance of their duties.
- (ii) Intellectual property rights: All intellectual property owned, developed or obtained by Sobi through research, development, or other activities (including patents, designs, copyrights, trademarks, know-how, data and technical knowledge) are vital assets of Sobi. Therefore, we will carefully safeguard Sobi's intellectual property and fully cooperate in the establishment, protection, maintenance and defence of Sobi's intellectual property rights.
- (iii) Confidential information of others: Sobi respects confidential information of third parties. Therefore, we will not obtain such information by illegal or unethical methods either directly or through the use of an agent, nor improperly disclose such information to any third party, nor misappropriate such information. In addition, we will not seek confidential information from other Sobi employees regarding their former employers.
- (iv) Intellectual property rights of others: Sobi respects intellectual property rights of third parties. Therefore, we will not misappropriate or infringe upon intellectual property rights of third parties.

## **10. PERSONAL INFORMATION / DATA PROTECTION**

It is Sobi's policy to respect the privacy of "personal information". Personal information is information that can be used to identify a specific individual by name, date of birth or other description contained in that information. It can include information about employees, patients, clinical study subjects, doctors, employees of customers and others.

We will comply with all applicable laws and regulations regarding protection of personal information in countries where we do business. These laws and regulations vary from country to country. At a minimum, however, we will adhere to the following:

- (i) We will collect personal information only for legitimate business purposes and by lawful means, and will not disclose or use personal information for purposes other than a legitimate business purpose or as required by law.
- (ii) We will protect personal information by reasonable security safeguards against accidental loss or destruction or unauthorised access, use, modification or disclosure.

## **11. COMPANY RECORDS, DISCLOSURES AND SECURITIES TRANSACTIONS**

- (i) **Company records:** we will comply with all applicable laws and regulations and company policies relevant to corporate accounting. We will record all transactions on the company books accurately and properly in accordance with generally accepted accounting principles, and will not make any false or artificial entries. We will maintain internal control systems to ensure that all transactions are accurately and properly recorded.
- (ii) **Disclosure:** Sobi is committed to making timely and accurate disclosure of company information to investors. We will comply with all applicable laws and regulations and company policies regarding financial disclosures. All employees involved in public disclosures will familiarise themselves with these laws and regulations and company policies.
- (iii) **Insider Trading:** We will comply with all securities laws and regulations restricting insider trading of securities. If, in performing our duties at Sobi, we become aware of “material non-public information” concerning Sobi, or any company transacting business with Sobi, we will not buy or sell securities of Sobi or that other company, either on our own account or on behalf of Sobi or any others, nor will we provide that material non-public information to others, until it is publicly disclosed in accordance with applicable laws, regulations and company procedures.

“Material non-public information” is any non-public information that could have a material influence on investors’ decisions to sell or buy securities. Examples may include issuance of shares, repurchase of shares, mergers and acquisitions, commercialisation of new products, progress or failure of clinical trials, and material changes in financial forecasts.

## **12. WORKPLACE**

- (i) **Conflicts of interest:** We will act in the best interests of Sobi and avoid any action or situation that may conflict with the interests of Sobi. If we have any actual or potential situation in which our personal interests conflict with Sobi’s interests, we will consult with our manager before taking any action, and then act in the best interests of Sobi.
- (ii) **Relationship with suppliers and customers:** We will select suppliers and customers based on fair and objective standards and without favour or preference based on any personal relationship.
- (iii) **Hospitality and gifts:** We will not accept or solicit any illegal or inappropriate benefits (including money, goods, hospitality, gifts, or any other item of value) from suppliers, customers or others with whom we do business.
- (iv) **Financial or employment interests:** We will not, without Sobi’s permission, have any material financial interest in, or engage in the activities of, any competitor or an actual or potential supplier or customer.

- (v) Personnel issues: We will handle personnel issues impartially and fairly, and will not give any advantage to an employee based on a personal relationship in handling personnel issues such as recruitment, evaluation, transfer, or promotion.

### **13. HUMAN RIGHTS**

Sobi supports and respects the protection of internationally proclaimed human rights and makes sure that we are not complicit in human rights abuses.

International sourcing and distribution means that Sobi needs to be aware of potential human rights issues both upstream and downstream in the business.

### **14. EMPLOYMENT PRINCIPLES**

Sobi upholds the freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced and compulsory labour, the effective abolition of child labour and the elimination of discrimination in respect of employment and occupation. This means:

- (i) Child labour: Sobi does not tolerate child labour in any form. No person younger than the statutory minimum age for employment according to the UN Convention on the Rights for the Child shall be employed.
- (ii) Forced labour: Sobi does not tolerate forced, compulsory or involuntary labour in any form. This includes any work or service that is extracted from someone under the menace of any penalty, and for which that person has not offered him or her voluntarily and against their own will or choice.
- (iii) Respect for diversity, no discrimination, harassment or abuse: Sobi respects diversity and the personal dignity of its employees. It is Sobi's policy to prohibit discrimination or harassment based on nationality, race, colour, creed, religion, gender, age, disability, political opinion, marital status, maternal/paternal status, social origin, sexual orientation or any other legally protected status.

Sobi will not engage in physical, sexual, psychological, and verbal or any other forms of harassment or abuse, or any other behaviour that could create a hostile work environment.

All employees shall be treated according to his or her abilities, qualifications, experience, behaviour, work performance and demonstrated potential in relation to the needs of the job in any employment decision, including, but not limited to, recruitment, promotion, compensation, benefits, training and termination.

Sobi takes appropriate measures to prevent such discrimination and harassment.

- (iv) Freedom of association & right to collective bargaining: All Sobi employees are free to exercise their legal right to form, join or refrain from joining organisations of their own choice and which represent their interests as employees. No employee should be subject to intimidation or harassment in his or her peaceful exercise of these rights.

Sobi shall also respect the employees' legal right to collectively bargain, a voluntary process or activity through which employees discuss and negotiate their relations, as applicable under local laws and conditions.

- (v) **Employee Health & Safety:** Sobi is committed to providing a healthy and safe work environment for its employees. We will comply with all applicable laws, regulations and company policies regarding occupational health and safety.

Sobi will take appropriate action to prevent workplace accidents or illness.

- (vi) **Compensation:** Wages, including overtime and benefits, shall equal or exceed the level required by applicable law.
- (vii) **Working hours:** Sobi recognises the need for a healthy balance between work and free time for all employees.

## 15. ENVIRONMENT

Sobi will support a precautionary approach to environmental challenges and undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies where possible.

Sobi is committed to minimising any adverse environmental impact of its products and operations. We will comply with all applicable laws, regulations and company policies concerning environmental protection and accident prevention in all our business activities and conduct them in a way that will conserve natural resources.

International sourcing and distribution means that Sobi needs to be aware of environmental issues both upstream and downstream in the business.

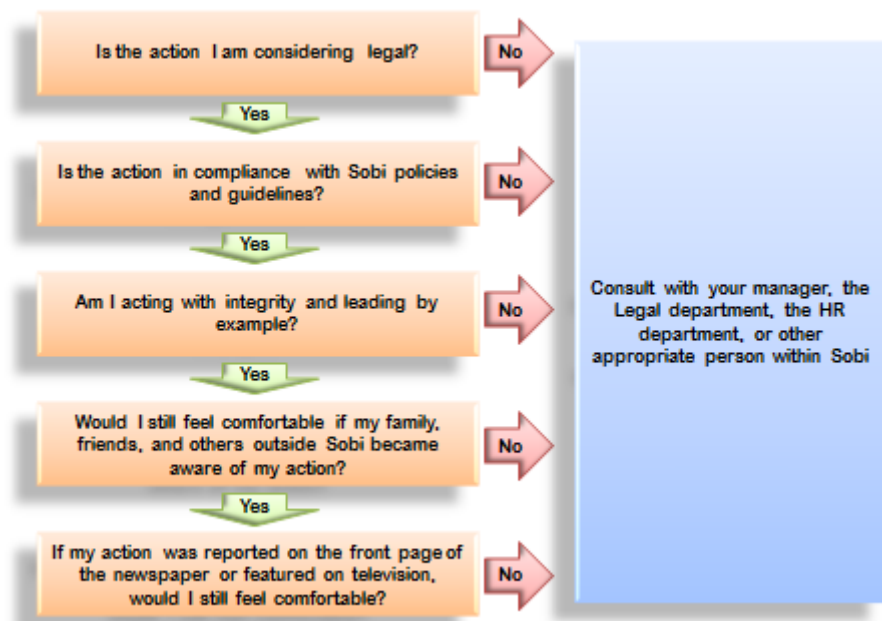
## 16. REPORTING POSSIBLE VIOLATIONS OF THE CODE

We are personally responsible for helping to fulfil the objectives of this Code of Conduct & Ethics by following all of its provisions, and preventing violations. We have an obligation to raise and report our concerns about anything we think may be a violation or a potential violation of the Code of Conduct & Ethics or the local code (if applicable).

It is Sobi's policy to:

- Encourage and support employees, who have a good faith belief that any of Sobi's employees or management are in violation of the Code of Conduct & Ethics, any law, or any company policy, to report the possible violation;
- Conduct a prompt investigation of any alleged violation and take appropriate corrective and/or disciplinary action; and
- Prohibit any retaliatory action against any Sobi employee for making a good faith report of a suspected violation of the Code of Conduct & Ethics, any law, or any company policy, even if a subsequent investigation proves the report to be unfounded.

As a Sobi employee, when you find yourself in any situation where you are unsure about how to proceed, or whether your decision would be in line with the Sobi Code of Conduct & Ethics, ask yourself the following questions before you take any action:



### **Sobi Policy in case of suspected breach of the Code of Conduct & Ethics:**

We strive to have an atmosphere where every line manager and supporting function shall be ready anytime to openly address and advice on a compliance concern or question raised by an employee. If you have concerns or questions about possible ethical misconduct, or suspect a possible violation of the Code of Conduct & Ethics or the local code (if applicable), any law or any company policy; you should contact any of the following:

- (i) Our Manager as soon as possible;
- (ii) Our Human Resource Manager;
- (iii) Our Compliance Personnel and/or Legal Department personnel; or
- (iv) Our Compliance Hotline (if available for our location, form to be decided).

The Code of Conduct & Ethics will be regularly reviewed to ensure that it is current.

Each individual employee is responsible for reading, understanding and acknowledging their personal responsibility in upholding the Code in their day-to-day work at Sobi. Each individual employee will be required to read and certify that they have understood and will adhere to the Code.