

# ETHICS AND COMPLIANCE CODE OF CONDUCT

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“Our Ethics and Compliance Code of Conduct ensures that we conduct business with the highest standards of ethics. The Code sets guidelines for business activities and serves as a foundation for our Company policies, procedures and requirements, all of which provide additional guidance on expected behaviors.

I encourage you to read this Code thoroughly and always act according to our Core Values as set out in this document. Together, we must remain vigilant and abide to this Code in our daily actions and behaviors.

Nordic Pharma’s reputation of integrity and responsibility has been solidly built over the last two decades. We now have a duty to forge a positive path and preserve our society for the future generations.”



**Charlotte Phelps**  
NORDIC PHARMA, CEO

## WHO DOES THIS CODE APPLY TO?

Our Code of Conduct serves to guide the actions of our Employees in line with our Company values. The Code helps our people do the right thing, at the right time and play by the rules wherever we operate around the world.

No matter where you work or what type of work you carry out for Nordic Pharma, you have a duty to act with integrity.

This Code of Conduct applies to every Nordic Pharma director, employee, contractor, and to everyone conducting business on behalf of Nordic Pharma (including suppliers, consultants and any other business partner).

In addition to this Code, Nordic Pharma has also implemented a set of internal policies and procedures that employees, contractors and everyone conducting business on behalf of Nordic Pharma have to comply with.

### THE CODE IS EVERYONE'S BUSINESS.

Board members



Directors



Employees



Contractors



## WHY DO WE HAVE A CODE ?

Besides our business and products, what helps us have a thriving and ethical Company is the way our Employees and stakeholders work and behave on a daily basis. Integrity is rooted in our Company culture and dictates all of our actions.

At times, you might encounter a situation where the right thing to do is not clear. This is what our Code of Conduct is for. It will serve as your reference tool for upholding our reputation and embodying our values. We are aware that the Code cannot answer every question, but it will indicate to you where to seek assistance when the answer is not clear.

If an Employee believes that our standards may be compromised, he or she has a duty to raise a concern.



- UPHOLD THE LAW AND OUR REPUTATION
- KNOW YOUR RIGHTS
- SPEAK UP



### How Can the Code Help You?

- Understand what Nordic Pharma expects from you.
- Behave with integrity and honesty.
- Support our values and safeguard our reputation.
- Make good and benevolent choices every day.
- Comply with the applicable laws and regulations.
- Know where to seek assistance and when to speak up.

# Our Values Our Commitments

UPHOLDING OUR REPUTATION  
AND EMBODYING OUR VALUES.

The Values we Share  
Patients are at the  
Heart of our Concerns  
We act with Equity,  
Honesty and Integrity



## PATIENTS, AT THE HEART OF OUR CONCERNS

Nordic Pharma always acts pursuant to rules of local governments and public health authorities.

In addition to full compliance with laws and regulations, we constantly aim to act with care and integrity. We are committed to improve the health of our people and to find new solutions for patients by blending science with advanced technology.

Our organization works hard to offer continuous supply of medicines and medical devices, while guaranteeing the safety and health of all our patients. Our common thread is to meet unmet medical needs.



- PATIENT SAFETY/TRUST
- PATIENT EXPERIENCE
- PATIENT SATISFACTION



Promptly report any adverse drug experiences which you become aware of to Nordic Pharma's Pharmacovigilance Department.



## ACT WITH EQUITY, HONESTY AND INTEGRITY

Nordic Pharma promotes a culture of integrity by making sure its employees make ethical decisions and show honesty and integrity in each business decision and business partnership they deal with. It is forbidden to achieve a business deal at the expense of violating our Code.

We encourage each one of you to use your good sense and good judgment. Be ethical, honest and right in any decision or action you take.

“DO WHAT IS RIGHT NOT WHAT IS EASY.”



### How to make a good decision? Ask...

- Is my action in line with the Code?
- Is my action legal?
- Will my action benefit Nordic Pharma instead of my personal goals?
- Would I feel at ease if my actions were disclosed publicly?

If **“YES”**, then the action you are about to take is fine.

If **“NO”** or **“MAYBE”**, then you should first seek advice before acting because you might be going against the Code.

# Compliance Accountability

WE PLAY BY THE RULES  
WHEREVER WE OPERATE  
AROUND THE WORLD.

Fair Competition  
Data Protection and Privacy  
Anti-Money Laundering  
Anti-Bribery and Corruption  
Conflict of Interest  
Disclosure of Interests  
Safety and Quality  
Animal Welfare

## FAIR COMPETITION



Nordic Pharma is committed to fair competition and free markets. Our employees must refrain from perpetrating illegal business practices, such as prohibited anti-competitive activities. Our Employees must refrain from unfair competition (engaging in any behavior that would limit competition).

Nordic Pharma endeavors to fulfil its purpose whilst adhering to the legal requirements of the countries where it operates.

Nordic Pharma is committed to observing all applicable export and import laws, including trade sanctions, embargoes, and other laws, regulations and government orders or policies whether imposed by the local government or by foreign governments with jurisdiction over a transaction.

### ANTI-COMPETITIVE AGREEMENTS:



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### What you can't do:

- Refuse to deal with a partner for inappropriate reasons.
- Collude with other companies to fix prices.
- Malign a competitor via false or incorrect information.
- Prevent a competitor from penetrating the market.

## DATA PROTECTION AND PRIVACY

Nordic Pharma is committed to safeguarding the privacy and personal data of all its Employees and other people with whom Nordic Pharma conducts business.

Personal information includes any information that can be used to identify an individual directly or indirectly.

Such data must be adequately protected and secured, and may only be disclosed or transferred to third parties when legitimate grounds to do so have been established and provided the adequate transfer mechanisms are in place.

The Policies governing Data Protection and Privacy Rights are set forth in the Nordic Pharma GDPR Code of Conduct.



Personal data includes, but is not limited to:

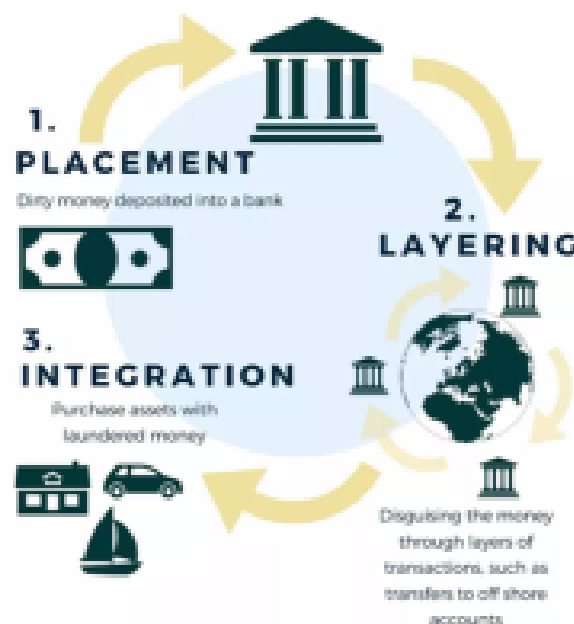
- Name
- Address
- Location
- Online
- Identifier
- Health information
- Cultural profile
- And more....

## ANTI-MONEY LAUNDERING

While it seems quite easy to avoid certain obvious criminal offenses, others, such as money laundering activities, may not always be obvious to identify and circumvent. This is why it is paramount to curtail exposure and to raise any suspicious concern.

Money laundering is the process of making illegally-gained funds appear legal. Typically, this could be funds generated through criminal activities, such as drug dealing, terrorism, tax evasion, smuggling weapons, prostitution rings, etc.). These funds are moved through legitimate enterprises in order to hide their criminal origin.

Nordic Pharma complies with all applicable anti-money laundering, financial crime and antiterrorism laws in all the countries where we conduct business, and thoroughly investigates its business partners.



### Watch out for red flags:

- A partner asking for a payment in cash.
- A partner asking for a financial transaction to circumvent the normal validation process.
- A partner asking for a financial transaction to be made to a party who is not the contractual party.

## ANTI-BRIBERY AND CORRUPTION

Nordic Pharma complies with all laws, rules and regulations governing bribery and corruption in all the countries in which it operates.

Nordic Pharma will not tolerate the payment, offer to pay, or authorization or receipt of any bribe or any other unlawful or improper payment to or from any public official or private person on behalf of Nordic Pharma. Bribery is the giving of money or something of value to influence the act or decision of someone who ordinarily would not change their course of action.

As a rule, Directors, Employees, Contractors and everyone conducting business on Nordic Pharma's behalf must not offer, ask for, provide or accept anything of inappropriate value either for themselves or for others in return for favorable treatment, nor directly or indirectly use of company funds, assets or premises to raise funds or to campaign.

If you encounter any of the side remarks you might be stepping in a gray zone. Seek advice. If anything feels strange or inappropriate, it probably is!



### If you hear the following statements:

- "This undertaking does not require any written permission!"
- "This is the way things are done in this country!"
- "A financial contribution may expedite business!"
- "In exchange for this partnership, I can lend you my house in the Bahamas!"

## ANTI-BRIBERY AND CORRUPTION

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At Nordic Pharma we attach great importance to having perennial and healthy business relationships with the counterparties we deal with. Indeed, we think it crucial that these business relationships stay benevolent and ethical – never pressured by proposals of inappropriate gifts, meals, or entertainment.

Gifts and hospitality occur in the normal course of business. This is a way of showing recognition and consolidating business relationships. One must however be aware that a luxurious present or hospitality may force the receiving party to feel obliged to give back the privilege or the favor, this is where a conflict of interest may arise.

Nordic Pharma has a clear yet uncompromising rule as regards gifts and hospitality: we do not accept or offer any gift/meal/hospitality in return for a business favor. Any action or gift that could, in any way, inappropriately influence or pressure a person into making a business decision is not tolerated.

### Gift is acceptable if it is:



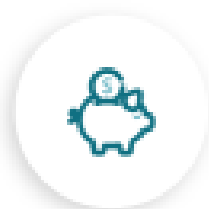
- MODEST IN NATURE
- COMPATIBLE WITH INDUSTRY STANDARDS
- RECEIVED WITHOUT CONDITIONS ATTACHED

## CONFLICT OF INTEREST

### What is a conflict of interest?

A conflict of interest may arise when personal interests interfere, with an Employee's ability to perform a job effectively and objectively or when an Employee's loyalty to Nordic Pharma can be compromised by actual or potential personal benefit from another source. Such conflict of interest may derive from external commitments and personal relationships, such as family or other close personal relationships, or can be caused by the acceptance of inappropriate gifts and invitations.

Employees must not engage in any activities, which could conflict with Nordic Pharma's business interests, adversely affect company reputation or interfere with the fulfilment of the responsibilities of the Employee's job.



Nordic Pharma employees should not use Nordic assets/information for personal gain.



### Watch out for:

- ✘ > «My dad has a great company that could do the job!»
- ✘ > «This will be our secret, you can work on this second job during the weekend!»
- ✘ > «We have known each other for a long time, you can surely prescribe my products.»



## DISCLOSURE OF INTERESTS

Nordic Pharma Employees must disclose any actual, potential, real or apparent conflict of interest to their Direct manager as well as submit it to the Compliance Officer for review and approval. Some potential or apparent conflicts may be accepted as long as they do not materialize.

If an Employee is aware or suspects a Conflict of Interest, he or she must immediately report that information to the Company. No employee shall be subject to retaliation because of a good faith report of a suspected violation.

A violation of the present Section governing Conflict of Interest may result in disciplinary action, up to and including discharge.



### Were you aware that?

When considering taking any second professional activity or consulting job with a client, supplier, partner or competitor, you must first ask your line manager and make sure there is no conflict of interest.

## SAFETY AND QUALITY

Nordic Pharma is committed to ensuring patient safety through optimal performance and quality of its products. Once approved, Nordic Pharma products are continuously monitored through the global collection and review of information regarding adverse events.

Nordic Pharma markets and sells its products in compliance with all applicable local laws and regulations and in line with ethical standards and industry practices.

All product materials and messages must be fully substantiated with acceptable data and accompanied by applicable prescribing and safety information. All product claims must be consistent with country-specific approved labelling and prescribing information.

Scientific misconduct is strictly prohibited. This may include, but is not limited to fabrication, falsification or plagiarism in proposing, conducting or reporting research and associated data.

CLINICAL  
TRIALS



TEST MEDICINAL PRODUCTS FOR  
SAFETY AND EFFICACY

SUBJECT TO EU LEGISLATION AND  
INTERNATIONAL STANDARDS



### We seek excellence in:



Product & Development



Manufacturing (GMPs)



Distribution (GDPs)



Labelling and prescribing  
information



Collection of adverse events



Audit control

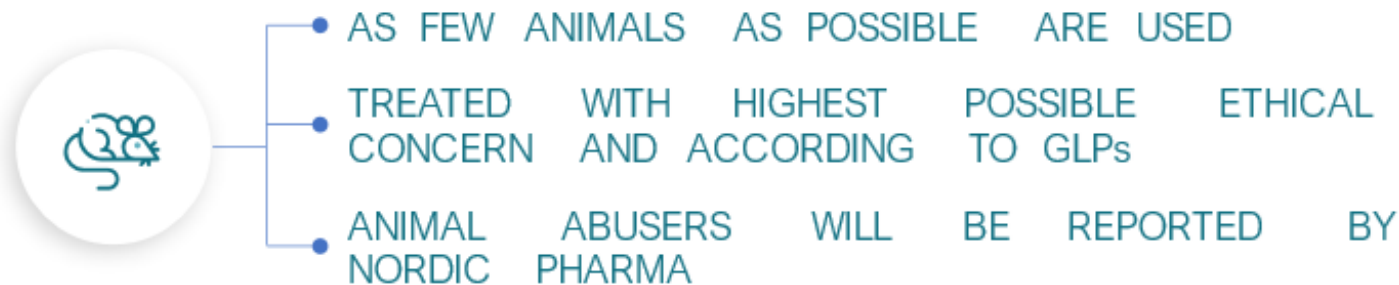
## ANIMAL WELFARE

Nordic Pharma is committed to the development and the use of scientifically validated testing methods that do not include animals whenever possible.

Nordic Pharma only does animal testing when it is a Health Authority requirement to substantiate a registration Dossier.

As Nordic Pharma commercializes products which are made out of well-known compounds, these testing are very limited and are, where possible, replaced by computer modeling or tests on cell cultures.

If animals are required to be used to conduct research and quality control, Nordic Pharma makes its best efforts to ensure that animals are treated with respect and with the highest possible level of ethical concern.



Mishandling  
neglect, witnessing  
and not reporting  
animal abuse

=

Termination of  
employment and  
prosecution under  
applicable laws

# CORPORATE SOCIAL RESPONSIBILITY

Caring for others

Ensuring the health and wellbeing of our patients, people, and communities



Reducing our environmental impact

Setting sustainability targets including for net zero, and measuring our progress



Driving positive change in our supply chain



Sharing our progress

Communicating through our annual sustainability report



Nordic Pharma's five-year roadmap is driving positive and sustainable change for the environment, our people and society, and through our supply chain.

## CORPORATE SOCIAL RESPONSIBILITY

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Nordic Pharma is committed to protecting the health and safety of its employees and the communities at large as well as the environment.

Nordic Pharma makes sure to conduct business with business partners who care and act for the well-being of the planet and commits to being an organization with leading environmental principles.

We strive to set the foundation to slowly enhance the environmental characteristics of our products and services to ensure their sustainability.

Nordic Pharma works to constantly train and encourage employees to work and conduct business in a safe, healthy, compliant and sustainable manner.



Nordic Pharma is committed to integrate sustainability into the lifecycle of its Products to meet unmet medical needs and to preserve resources for future generations.

# An Ethical Workplace

WE STRIVE TO CREATE  
AN ENVIRONMENT THAT  
WORKS FOR ALL.






A Safe, Healthy and  
Tolerant Workplace

We protect Human  
Rights

## A SAFE, HEALTHY AND TOLERANT WORKPLACE

The health and safety of all Employees is of utmost importance to Nordic Pharma. Employees must act responsibly to protect and preserve a healthy and safe workplace for the community. This includes being aware of the applicable health and safety rules for their site or area, including crisis management plans.

Nordic Pharma provides equal opportunities to employees, customers and business partners regardless of:

-  Ethnicity
-  Religion/politics/personal beliefs
-  Disability
-  Gender
-  Sexual orientation

Any form of disrespectful or abusive behavior, threats, harassment, bullying, intimidation, or acts of violence is prohibited and will be severely punished.








If you witness any event that creates a **negative** or **unsafe** work environment, you must immediately report it to your local Environment, Health and Safety representative.

## WE PROTECT HUMAN RIGHTS

Nordic Pharma is committed to the respect of Human rights as dictated by the United Nations. Our goal is to respect and protect human rights and fundamental freedoms of employees and business partners while conducting business.

On a day-to-day basis, we promote human rights and we condemn any infringement to these rights from any of our employees, suppliers or business partner.

We make sure to:

-  Offer a healthy and safe workplace to our employees.
-  Respect Diversity and Inclusion.
-  Offer decent work hours, wages and benefits to our employees.
-  Immediately end business relationships with partners that have been suspected of child labor, forced labor or human trafficking.
-  Respect freedom of association and collective bargaining.



### At Nordic, in 2021, women represent:

- More than 55% of Senior roles
- Half of our Global Leadership Committee



### Nordic Pharma has:

- More than 250 employees worldwide
- Located in more than 15 countries
- More than 20 nationalities



# Be Aware, Speak up.

ALL CONCERNS RAISED WILL BE  
TREATED PROMPTLY, FAIRLY AND  
DISCREETLY.

How to report Misconduct

Channeling your Report  
through the Whistleblowing  
Procedure

How we handle your Report?

What happens when a Code  
violation materializes ?

## HOW TO REPORT VIOLATIONS

A Whistleblower may raise concerns either by direct communication or anonymously through any of the following:

		
<p><b>Call a dedicated phone <u>hotline</u></b></p> <p>Depending on the country you call from, the number will differ.</p>	<p>A secure online platform has been implemented where you can raise your concern</p> <p>Nordicpharma.ethicspoint.com</p>	<p>The <u>smartphone/tablet platform</u></p> <p>Nordicpharmamobile.ethicspoint.com</p> 

The concern(s) shall be presented in the following format:

- Background of the concern(s) (with relevant dates).
- Reason(s) why the whistleblower is particularly concerned about the situation.
- Supporting evidence for the allegations, if available, would be helpful in the investigation.



It is recommended to get documentary evidence of the fraud when possible.

Such evidence can include:

- Emails
- Internal studies
- Billing records
- Or test results

# THE WHISTLEBLOWING PROCEDURE

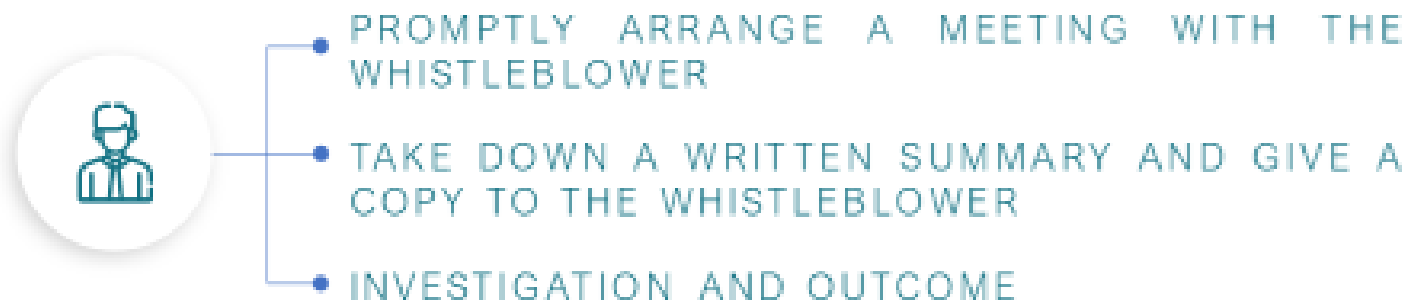


## HANDLING OF REPORTED VIOLATIONS

All concerns raised by the employee will be treated promptly, fairly and discreetly.

Reports of violations or suspected violations will be kept confidential to the extent possible, subject to due process and consistent with the need to conduct an adequate investigation.

An ethics committee is responsible for investigating and resolving all reported complaints and allegations concerning violations or suspected violations. This committee is required to report to top management at least annually on compliance issues.



Appropriate disciplinary actions or potential criminal prosecution will be launched.



### Examples of Code Violation:

- Sexist, homophobic or racist remark and action
- Accepting a bribe
- Knowingly not telling that there was a safety issue on a Product

## WHAT HAPPENS WHEN A CODE VIOLATION MATERIALIZES ?

When one of our employees goes against the Code or breaches applicable laws, turns a blind eye to someone else's failure to follow the Code or compels someone else to break the Code, a violation materializes. This can jeopardize Nordic Pharma's reputation and disrupt its business.

Breaches may involve major risks of penalties for companies and their employees (prison sentences, heavy fines, professional disqualification, ban from public contracts and/or international funding, etc.). Therefore, Nordic Pharma will deal with any instance of breach seriously.

Any Code violation will result in disciplinary action against those involved, up to and including termination of employment or contract, and reporting of those persons to relevant regulatory and criminal authorities. Nordic Pharma will support those authorities in any prosecution brought against these persons.



**Zero-Tolerance policy**  
towards breaches of the  
Code

## SPEAK UP

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DEPARTMENT	CONTACT
Management	<ul style="list-style-type: none"><li>• Line manager</li><li>• Any other Director</li><li>• Top management</li></ul>
Human Resources	<ul style="list-style-type: none"><li>• Local HR manager</li><li>• Corporate HR Director</li></ul>
Data Privacy	<ul style="list-style-type: none"><li>• Data Privacy Officer</li></ul>
Legal	<ul style="list-style-type: none"><li>• Legal advisor</li></ul>
Whistleblowing platform and hotline	<ul style="list-style-type: none"><li>• <a href="https://nordicpharma.ethicspoint.com">Nordicpharma.ethicspoint.com</a></li><li>• <a href="https://nordicpharmamobile.ethicspoint.com">Nordicpharmamobile.ethicspoint.com</a></li><li>• Tel: Depending on the country you call from, the number will differ.</li></ul>

## FINAL WORDS

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Thank you for your commitment to Nordic Pharma and to the Nordic Pharma Compliance Code of Conduct.

Nordic Pharma's reputation and success were built by groups of committed, hardworking employees and stakeholders like yourselves, who have decided to do the right thing by abiding by this Code on a daily basis. Every decision, every action and every business deal counts, so keep doing the right thing!



Be positive and purposeful and work each day in a way that will inspire others!

This Compliance Code of Conduct offers guidance on how to behave, enabling each one of us to work and act in the best possible way. However, the Code alone is not enough. This is why you should not only follow the Code, but also your conscience. Follow your instincts: if something does not feel right, it probably is not the right thing to do. In such cases, feel free to seek advice before acting. Don't be afraid to speak up!

## ANY QUESTIONS?

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This Code of Conduct is not a contract of employment. Failure by employees to follow our Code or applicable laws, is a violation. Subject to local law, violation of this Code of Conduct may lead to corrective action up to and including termination of employment, and criminal prosecutions.

Nordic Pharma reserves the right to make unilateral changes to this Code or company policies at any time.

If you have any questions about our Code or our policies, please contact us:

 Nordic Pharma - 216, bd Saint-Germain, 75007 Paris, France.

 [info@nordicpharma.com](mailto:info@nordicpharma.com)

 [dataprivacy@nordicpharma.com](mailto:dataprivacy@nordicpharma.com)

 Compliance hotline

Consumers and Health care professionals are encouraged to report any adverse drug reaction that may have occurred after a Nordic Pharma drug intake to: [pv@nordicpharma.com](mailto:pv@nordicpharma.com) and/or to health authorities <http://www.adrreports.eu/>



