

# Sobi Code of Conduct & Ethics

## Contents

INTRODUCTION .....	2
PRODUCT SAFETY AND QUALITY .....	2
RESEARCH AND DEVELOPMENT .....	2
PRODUCT INFORMATION .....	3
RELATIONSHIPS WITH HEALTHCARE PROFESSIONALS AND HEALTHCARE ORGANISATIONS .....	3
ANTI-CORRUPTION AND ANTI-BRIBERY .....	3
COMPETITION LAW .....	3
INTERNATIONAL TRADE CONTROLS .....	4
PROTECTION OF COMPANY ASSETS .....	4
CONFIDENTIAL INFORMATION / INTELLECTUAL PROPERTY .....	4
PROTECTION OF PERSONAL INFORMATION .....	5
COMPANY RECORDS, DISCLOSURES AND SECURITIES TRANSACTIONS .....	5
CONFLICT OF INTEREST .....	5
EMPLOYMENT PRINCIPLES .....	6
ENVIRONMENTAL RESPONSIBILITY .....	7
REPORTING POSSIBLE VIOLATIONS OF THE CODE .....	7
IN YOUR EVERYDAY BUSINESS ACTIVITIES ASK YOURSELF .....	8

## **INTRODUCTION**

The Sobi Code of Conduct & Ethics provides a framework for what Sobi considers to be responsible and appropriate conduct. Furthermore it assist the organisation in contributing to Sobi's sustainable development.

The Sobi Code of Conduct & Ethics applies to all Sobi employees, temporary personnel, consultants, agents or anyone working on behalf of Sobi. Line Managers are responsible for making these guidelines known, and for promoting and monitoring compliance.

No guidelines, no matter how detailed, can possibly anticipate all of the challenges we may face on the job. We are therefore always expected to use our judgement and common sense, and act in accordance with both the letter and the spirit of the Sobi Code of Conduct & Ethics.

Violation of the 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.

Sobi is committed to work only with contractors, such as suppliers, joint venture or co-promotion partners, and research or licensing partners, who embrace standards of ethical behaviour that are consistent with our own.

The Sobi Code of Conduct & Ethics will be reviewed on a regular basis.

## **PRODUCT SAFETY AND 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 will always adhere to our internal policies and standard operating procedures designed to protect patient safety, and to ensure quality of our products.

## **RESEARCH AND DEVELOPMENT**

High-quality and ethical science is of highest importance to Sobi, and compliance with relevant laws, regulations and international standards governing research and development is a minimum requirement, which permeate all research and development activities.

In order to protect individuals taking part in clinical research, and avoid exposure to unnecessary risks, all studies must be approved, conducted and reported in compliance with the International Conference on Harmonisation (ICH) Guideline for Good Clinical Practice (GCP), applicable regulatory requirements, and in accordance with the latest revision of the Ethical Principles for Medical Research Involving Human Subjects (the Declaration of Helsinki). All clinical studies will be registered and reported in compliance with applicable regulations.

Prior initiation, all research proposals must be ethically and scientifically reviewed according to relevant laws and regulations.

All research involving animals must be carefully considered and justified and the 3R (replacement, reduction and refinement) principles must be applied.

## **PRODUCT INFORMATION**

When providing information about our products, the information provided must always be accurate, balanced, fair, supported by scientific evidence, not false or misleading and compliant with all applicable laws, regulations and industry codes.

Company procedures designed to ensure that the product information comply with relevant external and internal requirements must always be followed.

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.

## **RELATIONSHIPS WITH HEALTHCARE PROFESSIONALS AND HEALTHCARE ORGANISATIONS**

Collaboration between physicians and the healthcare industry has for long been a positive driver for advancements in patient care and progression of innovative medicine. Sobi is committed to complying with all applicable laws, regulations, and industry codes, including codes established by regional and local industry associations, when interacting with healthcare professionals and organisations.

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 and organisations, we will have a legitimate business need, and we will not pay more than an appropriate market value for the services rendered.

## **ANTI-CORRUPTION AND ANTI-BRIBERY**

Sobi is committed to prevent corruption in all its forms, including bribery, extortion, embezzlement, fraud and theft.

We will not provide, offer or promise any bribe (including money, goods, hospitality, gifts or any other item of value), directly or indirectly, to e.g. government officials, health care professionals and organisations. 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.

## **COMPETITION LAW**

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.

## **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.

## **PROTECTION OF COMPANY ASSETS**

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

## **CONFIDENTIAL INFORMATION / INTELLECTUAL PROPERTY**

- (i) Confidential information: During and after employment, we will keep confidential, and protect all such 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 for performance of our duties to Sobi. Even within Sobi, we will not use such information for any purpose other than for 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.

## **PROTECTION OF PERSONAL INFORMATION**

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, and the use of "personal information" is restricted by law. Within Sobi we may come across such information about employees, patients, clinical study subjects, physicians, 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.

## **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.

## **CONFLICT 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 interest conflict

with Sobi's interest, we will consult with our Line Manager, HR or Legal Department before taking any action, and then act in the best interests of Sobi.

## **EMPLOYMENT PRINCIPLES**

Sobi supports and respects the protection of internationally adopted human and labour rights. 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. 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 is unacceptable. Sobi does not tolerate 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.

- (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 and 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.

## **ENVIRONMENTAL RESPONSIBILITY**

Protection of the environment is a precondition for sustainable development. Compliance with applicable laws and regulations are required but is not enough. Relevant international standards, conventions and declarations must also be considered and incorporated in company policies and guidelines when applicable. Sobi will strive to improve its environmental performance as well as the performance of others within our sphere of influence.

The basic principles are:

- (i) Apply the precautionary approach
- (ii) Perform risk assessments to proactively take environmental considerations
- (iii) Prevent pollution in preference to mitigating the impact
- (iv) Promote the development and diffusion of best available environmentally sound technologies
- (v) Avoid using hazardous chemicals and materials
- (vi) Replace non-renewable resources with more sustainable alternatives
- (vii) Promote energy, water and materials efficiency

## **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.

It is Sobi's policy to:

- (i) 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;
- (ii) Conduct a prompt investigation of any alleged violation and take appropriate corrective and/or disciplinary action; and
- (iii) 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.

If you have concerns or questions about possible ethical misconduct, or suspect a possible violation of the Code of Conduct & Ethics, any law or any company policy; you should contact any of the following:

- (i) Your Line Manager;
- (ii) Human Resource Manager;
- (iii) Compliance Personnel and/or Legal Department personnel

If you prefer to contact someone outside your area, and/or wish not to disclose your contact information, you may use the Sobi Compliance Hotline (link available on Sobi intranet start page).

## IN YOUR EVERYDAY BUSINESS ACTIVITIES ASK YOURSELF

