

Anti-Bribery and Anti-Corruption Policy

Swedish Orphan Biovitrum Group



1. INTRODUCTION

1.1 Purpose

Sobi is committed to preventing and prohibiting bribery and corruption in connection with our business activities around the world. This commitment extends to third parties we engage to perform services on our behalf.

This Anti-Bribery and Anti-Corruption Policy (the "Policy") complements the Sobi Code of Conduct and sets forth the global rules to be applied by Swedish Orphan Biovitrum AB (publ) and its subsidiaries (collectively "Sobi") in order to prevent bribery and corruption in activities under Sobi's control.

The Policy also includes principles for managing actual or potential conflicts of interest.

1.2 Scope and Applicability

All directors, officers, employees, and temporary staff, collectively referred to as "Sobi Representatives," are required to comply with this Policy. Department heads and line managers are responsible for communicating this Policy to their respective teams, for ensuring the relevant training is completed by team members, and for overseeing that this policy is complied with in their departments.

This Policy addresses a variety of contexts in which corruption issues may arise. Interactions with healthcare professionals, healthcare providers, payers, patients, and patient organisations are also explained in/by Sobi's healthcare compliance programme. For the avoidance of doubt, all interactions with such counterparts must comply both with this Policy and with the healthcare compliance framework.

This Policy contains Sobi's global minimum standards, and it is aligned with industry codes and legislation, such as the US Foreign Corrupt Practices Act and the UK Bribery Act. In case of conflict between this Policy and applicable laws and codes, the more restrictive of the provisions apply. Any agreed exceptions to this Policy must be approved in advance and in written by the Corporate Compliance Committee.

2. BASIC PRINCIPLES

2.1 Basics

2.1.1 Bribery

Bribery means directly or indirectly giving or accepting, or an offer, promise or request to give or to accept, anything of value to secure an improper advantage, in exchange for or as an inducement to receive or perform an act that is illegal, or to induce the recipient to abuse his or her power or official position. Bribes can take the form of payments, gifts, entertainment, hospitality, travel expenses or personal favors. Even business practices or social activities that are common in some parts of the world – such as the provision of gifts and hospitality – can constitute bribes in some circumstances.

Bribery is illegal worldwide. The bribery of Government Officials is a serious crime under

the laws of most countries in which we do business.

2.1.2. Corruption

Corruption is the dishonest or illegal behaviour, especially by people in power, typically involving bribery. It can also include other acts, such as fraud, embezzlement, favouritism, and nepotism.

2.1.3 Conflicts of interest

Conflicts of interest occur when personal, financial, or other interests outside of the company may influence, or may be seen to influence, the professional duties and decisions of Sobi Representatives.

2.2 Key Sobi principles

- (a) Sobi shall comply with all legal requirements applicable in the specific countries in which Sobi does business. Failure to comply with anti-corruption and anti-bribery laws can result in severe sanctions and may expose Sobi and Sobi Representatives to significant monetary penalties and criminal enforcement. Violations could also damage the Sobi's reputation and affect our ability to conduct our business around the world.
- (b) Sobi shall do business with a high degree of integrity and ethics.
- (c) No Sobi Representative may offer a bribe or accept a bribe, whatever the form, method or purpose.
- (d) Sobi does not offer or provide so-called facilitation payments to induce the timely performance of duties by Government or other Public Officials and employees they are otherwise obligated to perform. Facilitation payments are prohibited by law in practically all countries as a form of corruption.

3. ENGAGEMENT OF THIRD PARTIES

Sobi regularly engages Third Parties to perform services and assist Sobi in its business activities. Sobi may be liable if a Third Party acts improperly by bribing others on behalf of Sobi or is involved in any form of corruption.

Therefore, prior to engaging certain Third Parties, Sobi personnel should ensure they know the Third Parties they engage and look out for red flags. In certain cases, a risk-based and adequate due diligence may need to be performed in compliance with applicable Sobi processes. When applicable, the outcome of the due diligence as well as the Third Party selection process must be clearly documented prior to engaging the Third Party and signing an agreement.

3.1 Third Party Due Diligence

The appropriate level of due diligence to identify bribery and corruption risk will vary depending on the relationship and the type of services to be provided by the Third Party. Detailed guidance and requirements on such due diligence is provided in the Sobi Policy

on Anti-Corruption Due Diligence on Third Parties.

3.2 Documentation

All Third Parties that are in scope for third party due diligence must enter into written contracts with Sobi that include anti-corruption compliance provisions and that are signed in accordance with the applicable signature and approval policy. These agreements must be filed together with the results of the due diligence conducted on the Third Party.

Internal processes for the selection of Third Party vendors, including Sobi's Procurement Policy and any other applicable due diligence procedures (including but not limited to sustainability, trade compliance, and quality, depending on the subject matter of an engagement), must also be followed.

Third Parties engaged to act on behalf of Sobi that are in scope for third party due diligence must agree to comply with Sobi's Partner Code of Conduct (available on sobi.com) or equivalent principles and by signing a contract including appropriate contract clauses on anti-corruption. No payments shall be made a Third Party without a detailed invoice which accurately describes the services provided and expenses incurred.

3.3. Fees

Payments made to Third Parties should represent no more than an appropriate remuneration for legitimate services rendered by such Third Parties. No part of the payment should be passed on by the Third Party as a bribe or otherwise in contradiction of this Policy. Hidden or disguised fees are prohibited.

4. HOSPITALITY AND GIFTS

4.1 General principles

The giving and acceptance of bribes is absolutely prohibited at Sobi. All Sobi Representatives are obliged to comply with this ban in their contacts with customers, suppliers, and other business contacts.

- (a) Limited reasonable corporate hospitality may be permitted in certain business relationships. It may be difficult to know where the boundaries lie for bribery and corruption and the assessment is often dependent upon the circumstances of each case.
- (b) At a minimum, the provision or acceptance of any benefit must be fully compliant with applicable laws, regulations, and codes, as well as applicable Sobi policies.

Benefits may not be given or accepted where the purpose is, or is suspected to be, to influence the recipient's behaviour or decisions. Strict restraint must be observed in case of ongoing business negotiations, procurement procedures or similar situations.

From an objective perspective, benefits that are given or accepted should be moderate and transparent and constitute a natural or useful element in the individual's performance of his/her official duties. Any permitted gifts must be modest and infrequent and of a nature that would not cause reputational damage to Sobi if disclosed publicly. Benefits may never

be given or accepted if they are conditional on certain conduct by the recipient or as a quid pro quo.

4.2 Specific requirements

4.2.1 Gifts

Gifts may never be given to Government and Public Officials, Healthcare Professionals, other decision makers in the context of approvals and access for Sobi products, and Representatives of Patient Advocacy Organisations. Sobi employees around the world should make sure local laws are adhered to.

Any other permitted gifts to business contacts must be moderate, fully compliant with applicable laws, regulations, and codes, as well as applicable Sobi policies. If there is doubt as to the moderate size of the gift, the approval from the nearest line manager must be obtained. When applying this rule, the value of repeated gifts to/from the same business contact during a period of less than 12 months shall be aggregated.

4.2.2 Meals and entertainment arrangements

The arrangements of meals are commonly part of conducting business; however, it should not supersede the main purpose of business meetings and may only be secondary to the business purpose.

Repeated invitations from/to the same person within short periods of time shall be avoided.

In connection with business negotiations, dinners, and entertainment arrangements, other than customary and permissible business meals, shall be avoided.

Entertainment may never be provided to Government/Public Officials, Healthcare Professionals, Representatives of Patient Advocacy Organisations, or other relevant decision makers. Meals may be provided to such individuals, where legally permitted, provided that they are of modest value and not extravagant, provided infrequently and secondary to a legitimate business meeting. Provision of such meals must also be fully compliant with all applicable laws and Sobi's healthcare compliance programme and never be extended to spouses or any other non- business-related accompanying persons.

4.2.3 Travel, study visits, training, conferences, and company organised events

Any invitation in Sobi's name for external parties to participate in travel, study visits, training, conferences, and company organised events shall be notified in advance to the recipient's employer, for example, by forwarding a copy of the invitation to the employee's manager if required by local rules and regulations. It is not permitted to invite a business contact's spouse or any other relative or closely related person. Substantial restraint shall be observed if and when issuing invitations to Government/Public Officials, Healthcare Professionals, Representatives of Patient Organisations and other relevant decisions makers, and any invitation must be fully compliant with applicable laws, regulations, and industry codes, as well as Sobi's healthcare compliance programme.

4.2.4 Political contributions

Sobi is politically neutral. We do not make payments or donations of any kind to political parties or candidates, or their institutions, agencies, or representatives. Our company name must not be used in political campaigns or to promote the interests of political parties or candidates.

4.2.5 Additional guidance

If in doubt as to whether or not a benefit is permitted, prior advice must be obtained from the senior management, the Chief Compliance Officer or other member of the Compliance department.

5. BOOKS AND RECORDS

Sobi is required to make and keep books and records that accurately and fairly reflect payments, expenses, and disposition of assets. Furthermore, Sobi must also develop and maintain a system of internal accounting controls for payments, expenses, and disposition of assets.

Sobi Representatives must never make false or misleading entries into Sobi's books and records. All transactions must have proper management authorisation and be accurately recorded in a transparent manner with clear description.

The following is a non-exhaustive list of examples of prohibited record keeping:

- Mischaracterizing the purpose of a payment into Sobi's books and records (e.g., describing a payment made on behalf of Sobi to a Government Official as a "Miscellaneous Fee" in an accounting entry);
- Using or causing someone else to use Sobi funds for an illegal or unauthorised purpose; and/or
- Creating or using an off-the-books or "slush" fund.

6. CONFLICTS OF INTEREST

6.1 Avoiding conflicts of interest

Sobi Representatives may make personal financial investments, pursue other business interests, and maintain social relationships with people they meet through business activities. However, Sobi Representatives must ensure that these activities do not result in an actual, apparent or potential conflict of interest with Sobi business activities, and that they are otherwise consistent with this Policy.

All Sobi Representatives must ensure that Sobi's interests are paramount when business opportunities are assessed, and when commercial decisions are taken. The conduct of Sobi's business should not be influenced by friendship or family connections.

Sobi Representatives must not use Sobi resources or their position as an employee for their own personal benefit or for the benefit of their friends, relatives, or any business activities

or relationships external to Sobi.

Sobi Representatives must not allow or appear to allow a personal relationship to influence their decision making or judgement.

Sobi Representatives who have received information on a non-public or otherwise not generally known fact that may have material impact on the price of the Sobi share or certain other financial instruments may not for own or anyone else's behalf acquire or dispose of such shares or financial instruments.

6.1.1 Engagements outside Sobi

Sobi Representatives must not do any work outside of Sobi that is related to the employment responsibilities unless it is disclosed to the line manager and a written approval is obtained. Line managers must take steps to confirm that such work is unlikely to conflict with the employment at Sobi before granting approval.

Sobi Representatives must not accept any appointment to the board of directors of an external organisation unless a written approval is obtained from the senior line manager who may, as necessary, seek advice from the Compliance department. Approval should generally not be given for directorships of suppliers, customers, or competitors of Sobi who are conducting, or may conduct, business directly within the Sobi Representatives' scope of responsibility or where the Sobi Representative will receive a financial benefit that could be open to question or misinterpretation if publicly disclosed.

6.1.2 Accepting gifts, invitations, and hospitality

Sobi Representatives may accept gifts or hospitality in the case of a company visit and other comparable events, provided the benefit is moderate given the circumstances in the individual case. If there is doubt as to the moderate size of the benefit, the approval from the nearest line manager must be obtained. When applying this rule, the value of repeated benefits from the same business contact during a period of less than 12 months shall be aggregated.

Travel, study visits, training, conferences, and sales promotion events for Sobi Representatives are permissible if they constitute a natural and useful part of the Sobi Representatives' professional role and responsibilities. A fundamental condition is that the content is legitimate with a clear programme stated in the invitation. There shall only be limited scope for entertainment and leisure. Sobi shall pay for the cost of travel and accommodation for its Representatives.

6.2 Disclosing and resolving conflicts of interest

Sobi Representatives must inform the line manager in writing of any actual, apparent or potential conflicts of interest at the time they become known or should reasonably have become known. Line managers will provide written direction on how to resolve or avoid the conflict after obtaining any necessary advice from HR or the Compliance department. If a Sobi Representative, or a close friend or relative to a Sobi Representative, has a financial or management interest in a Third Party that is a customer, supplier, or competitor of Sobi, the Sobi Representative must disclose the situation as a potential conflict of interest to the line manager. The Sobi Representative must not participate in any purchasing or other

company decisions related to that Third Party.

Third parties are required to disclose to a Sobi manager any actual, potential or apparent conflicts of interest that they may have with respect to Sobi customers, suppliers, or competitors as soon as the conflict becomes known or should reasonably have become known.

7. COMMUNICATION, TRAINING AND REPORTING MISCONDUCT

7.1 Information

All Sobi Representatives shall receive information and training on this Policy.

7.2 Monitoring, evaluation, and review

It is the responsibility of each manager in Sobi to ensure that their staff are fully informed about this Policy.

The contents of this Policy shall be reviewed on a regular basis in order to ensure that the rules remain consistent with all applicable laws and address Sobi's potential risk.

7.3 Reporting of misconduct

Sobi shall provide secure and accessible channels through which employees and others shall feel free to raise concerns and report violations in confidence and without risk of reprisals (i.e., Sobi Compliance Hotline).

7.4 Exceptions

Any agreed exceptions to this Policy must be approved in advance and in written by the Chief Compliance Officer and/or the Corporate Compliance Committee.

8. DEFINITIONS

Facilitation Payment	The payment of a relatively small amount of money, or the granting of any other benefit, usually to low-ranking public officials, for their personal benefit or to expedite the performance of a routine governmental action. Facilitation payments are prohibited and can be prosecuted.
Public and Government Official	Any individual who (i) holds a legislative, administrative, or judicial position of any kind whether appointed or elected; (ii) exercises a public function for a country or territory, or any public agency or public enterprise of that country or territory; (iii) acts as an official or agent of a public international organisation; (iv) and any family member or other representative of any of the foregoing. Such individuals could work on behalf government agencies such as regulators, pricing authorities, customs, and health departments. Government and Public Officials should be interpreted broadly and may include Healthcare Professionals employed by or acting on behalf of a government-owned or operated healthcare facility, institution, university, or hospital.
Healthcare Professionals (HCPs)	Any member of the medical, dental, pharmacy or nursing professions or any other person, who in the course of his or her professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product, or other Sobi products or services. This includes doctors, nurses, hospital managers, and consultants employed by hospitals and this definition shall be extended to include all HCPs as identified by local legislation in all Affiliates.
Patient Organisation	An organisation, including a national member organisation, which may or may not have a charitable or non-for-profit status, which represents and supports the needs of patients and/or caregivers.
Third Party	A non-Sobi entity and/or individual engaged to perform services on behalf of Sobi.