Code of Conduct

Our mission is to identify, unlock and level up breakthrough therapies for people living with rare diseases

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Introductory Message

The Sobi® Code of Conduct outlines what we consider responsible and appropriate conduct. It sets out what we expect of you as an employee and what our stakeholders can expect from us. It reflects our most important policies and principles and guides us in the Sobi way of working. Company policies must also be understood and followed.

Each of us must read, understand, and act in accordance with the Code and help prevent violations. Managers must act as ambassadors of the Code - embedding it into daily decisions and creating an environment where people feel safe to raise questions or concerns. It is everyone's responsibility to preserve our collaborative culture and support each other in making the right decisions.

Throughout the company, we are united by our mission to identify, unlock, and level up breakthrough therapies for people living with rare diseases. By safeguarding our strong culture of doing the right thing and living our values, we will continue to fulfil our mission sustainably for years to come.

The Code applies to us all

The Code applies to all Sobi employees worldwide, as well as temporary personnel, consultants, and others acting on our behalf.

Our values

Our Code of Conduct is aligned with our five values, which underpin everything we do:

Care - for patients, our colleagues, and our company - is at the core of what we do.

Ambition - we demonstrate ambition by challenging the status quo through innovation and curiosity.

Urgency - we act with urgency because the patients we serve cannot wait.

Ownership - we show ownership by making bold decisions and acting on them.

Partnership - we work in partnership to create the best opportunities for everyone.

Together, our five values guide us in how we work. Across all of them, acting with integrity and in line with our Code is non-negotiable.

Making the right decisions

The Code covers many situations and gives you clear directions where possible. However, there will be times when you will need to exercise judgement. If you find yourself in a situation where you are not sure what to do and you can't find the answer in the Code or other policies and guidelines, then ask yourself the following questions:

- **Is it aligned with our values of care, ambition, urgency, ownership, and partnership?**
- **Is it consistent with our vision and mission to support people living with rare diseases?**
- **Would you be comfortable to tell others what you decided to do?**
- **Is it legal and is it ethical?**
- **If it got into the news, would it support our reputation?**

If your answer to any of these questions is no, then don't do it. If you are unsure or if there seems to be a conflict, ask your manager for advice, or consult Compliance, Legal, or HR. Because we operate across multiple jurisdictions, our activities may be subject to several legal and regulatory regimes. For this reason, employees should seek guidance early from relevant colleagues whenever activities involve cross-border considerations.

Where local laws or industry rules impose requirements stricter than Sobi's standards, we follow the local requirement. Where Sobi's standards are stricter, we follow Sobi's standards.

Violations of the Code are not tolerated and may lead to disciplinary action proportionate to the nature and severity of the breach, in accordance with applicable laws and regulations.

Speaking up

Your responsibilities

We are all responsible for upholding this Code by following its requirements and by preventing violations.

We encourage and support reporting of any possible or actual violation of the Code, applicable laws, industry codes, or company policy. All allegations are reviewed and investigated in accordance with our policies and appropriate corrective or disciplinary action is taken when warranted. Sobi strictly prohibits retaliation against any individual who participates in an investigation or who makes a report with reasonable grounds to believe that the information reported was true. This also applies if the report turns out to be unsubstantiated.

How to raise concerns

If you have concerns or questions about possible misconduct, or suspect a possible violation of the Code, any law or industry regulation, or any company policy, contact:

- Your line manager (or someone higher in the reporting line, if you are not comfortable to raise it with your manager)
- Your HR manager or
- A compliance or legal colleague

Alternatively, you can use the Sobi Compliance Hotline available both on our intranet and external corporate website. Anonymous reporting is also possible through the hotline subject to local laws and regulations.

Role of Managers in Upholding the Code

Managers play a uniquely influential role in how the Code is understood and practiced. Managers are the first line of support for employees with questions or concerns, creating an environment where people feel safe speaking up.

What we expect from each other:

- Follow this Code and lead by example - demonstrate ethical decision-making, transparency, and accountability, and foster a speak-up culture by encouraging questions and ensuring concerns are addressed appropriately.
- Support your team to complete all required training and understand key compliance risks relevant to their roles.
- Support colleagues to meet targets or deadlines in ways that uphold ethical and compliance standards; do not ignore red flags or assume issues will resolve themselves.

”We are guided by patients' evolving needs”

Interactions with Patients and Patient Organisations

Our approach to patient engagement is grounded in building long-term, trust-based relationships across the rare disease community, always guided by patients’ real and evolving needs.

Our engagements and initiatives reflect our commitment to collaboration, connection, and shared learning across the rare disease ecosystem. By supporting platforms that bring voices together, we aim to foster understanding, encourage responsible engagement, and promote solutions that matter to patients and their communities. We seek to remove barriers to access and ensure that pricing, supply, and partnerships support sustainable availability of our treatments for the patients who need them.

We interact with patients, caregivers, and patient organisations with integrity, transparency, trust, and mutual respect, and in full compliance with applicable laws, industry regulations, and Sobi’s policies.

Our collaborations support patient needs, improve understanding of diseases, and advance meaningful outcomes and never serve product disguised promotional purposes.

We only work with organisations that are reputable, typically non-profit, and organised with the intent of being a representative body on behalf of a disease or condition.

We respect the independence of these organisations and ensure that any support we provide does not exert influence, create conflicts of interest, or compromise their mission. We accurately document and transparently disclose funding and support to covered recipients in accordance with applicable laws and industry regulations. See the Policy on Healthcare Interactions.

What we expect from each other:

- Be transparent about any interaction with, or support provided to, a patient organisation, including documenting the purpose, nature, and value of the interaction.
- Act with clear purpose - ensure every interaction has a legitimate, well-defined objective that supports patient needs and respects organisational independence.
- Do not pressure or inappropriately influence patient organisation decisions, priorities, advocacy positions, or policy activities.

”We respect healthcare stakeholders”

Interactions with healthcare professionals and organisations

Healthcare professionals and organisations routinely work with companies to advance patient care and develop new medicines. All our healthcare interactions are intended to benefit patients or enhance the practice of medicine. The community must be confident that treatment choices are based solely on the merits of each product and the needs of individual patients. See the Policy on Healthcare Interactions.

What we expect from each other:

- Act with full transparency in our interactions with healthcare professionals and healthcare organisations.
- Ensure we only obtain services from healthcare professionals and healthcare organisations for a legitimate business need and that all compensation or funding is reasonable and reflects fair market value.
- Ensure any activity with healthcare stakeholders is properly documented and approved in accordance with our policies and related processes before any commitments are made.
- Do not interfere with, influence, or attempt to influence a healthcare professional’s independent medical judgment.

”We commit to product safety and quality”

Product safety and quality

Patient safety is our highest priority, demonstrated by our compliance with pharmaceutical quality standards and pharmacovigilance best practice. We take measures to prohibit any falsification of our products and support traceability. Throughout our medicines’ lifecycle, Sobi performs proactive and continuous assessment of the benefits and risks of our products in the context of relevant cumulative information.

What we expect from each other:

- Follow all assigned trainings and applicable pharmaceutical good practice (GxP) requirements (e.g. relating to research, development, manufacturing, storage, distribution, and post marketing activities).
- Maintain data integrity at all times by documenting information truthfully, accurately, timely, and in accordance with internal procedures.
- Do not ignore or delay reporting any product safety or quality concern or modify, conceal, falsify, or omit data or documentation.
- Do not use unvalidated vendors, laboratories, manufacturers, or transportation for good practice (GxP) relevant work.

Accuracy of product information

We promote a product for a specific use in a country only once regulatory approval for that product and indication has been granted and marketing is allowed. We ensure that all product information is accurate, balanced, fair, up to date, and fully supported by scientific evidence. We do not promote unapproved uses of our products or make claims that extend beyond the approved label.

What we expect from each other:

- Ensure that product information is accurate, balanced, fair, up to date, and supported by adequate scientific evidence.
- Use only materials, messages, and information that have been internally approved by authorised individuals.
- Do not make promotional claims that are inconsistent with the relevant approved label or applicable regulatory requirements.

”We commit to ethical research and drug development”

Ethical research and development

High-quality and ethical science is of the highest importance to us. Our research is founded on scientific and medical needs. Study designs must enable scientifically sound evaluation. To avoid exposing participants to unnecessary risks, all studies are ethically and scientifically reviewed and approved, and conducted and reported in compliance with:

- The International Conference on Harmonisation (ICH) Guideline for Good Clinical Practice (GCP)
- The latest revision of the Ethical Principles for Medical Research Involving Human Subjects (the Declaration of Helsinki)
- All legal and regulatory requirements

When conducting clinical studies, we ensure participants receive comprehensive, easy-to-understand information so they enrol only of their own free will and with informed consent. Patients have the right to withdraw from a study without compromising the care they receive.

We conduct our research openly. We register and report all clinical studies and share complete and accurate results, even when outcomes are not beneficial for our business.

We understand that use of human biological samples is a potentially sensitive area, and all use must comply with relevant legislation, regulations, and guidelines.

Sobi engages validated suppliers and expects adherence to the principles stated in our Partner Code of Conduct. Animal studies are only considered when acceptable alternatives do not exist, with application of the 3R principles of replacement, reduction, and refinement.

What we expect from each other:

- Ensure all research is driven by legitimate scientific and medical need and that informed consent is freely given without pressure.
- Follow GCP, ICH, Declaration of Helsinki, and all legal and regulatory requirements for clinical and pre clinical studies.
- Do not misrepresent data, selectively report outcomes in order to distort or deceive, or alter study results.
- Do not use human samples without lawful basis or ethical permission.

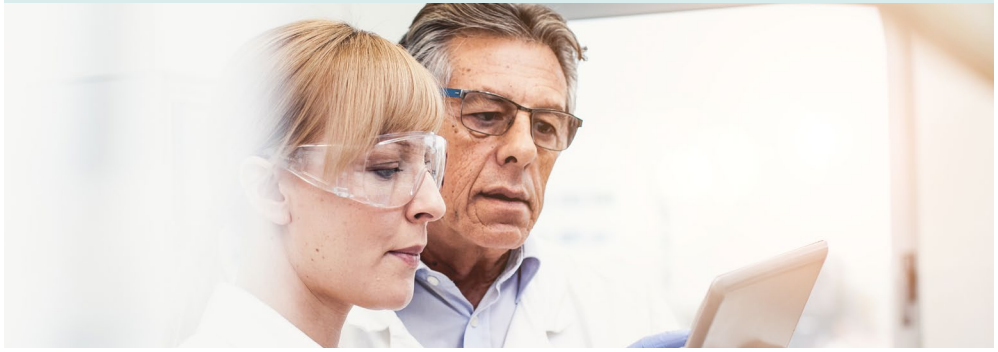
”We provide a safe and healthy inclusive workplace”

Safe and healthy workplace

At Sobi you can expect a safe and healthy workplace - one that protects physical safety as well as mental wellbeing. A healthy workplace means promoting work-life balance and recognising the impact that prolonged stress and psychological pressure can have on health. No one should be injured or harmed while at work. Managers are responsible for ensuring that employees and contractors are provided with regular training as well as any safety equipment they need. We continuously evaluate operational risks to prevent incidents. See the Sobi Health and Safety Policy.

What we expect from each other:

- Take action to prevent accidents, injury, and illness. Discuss with your line manager or HR how to manage problematic work-related stress or if you observe dangerous situations, incidents, or concerns about wellbeing or excessive workload.
- Comply with instructions and training on health and safety.
- Do not undertake tasks that could put yourself or others at risk, including bypassing safety procedures, equipment, or required training.



A fair and inclusive workplace

Diversity and equity are a foundation for our strength. Sobi is committed to creating an inclusive, healthy and flexible workplace that fosters growth, develops professionals from different backgrounds, and that provides a supportive culture. Sobi works to enable its people to achieve their full potential, recognises their effort, and rewards impact. We support equal treatment and have zero tolerance for discrimination.

What we expect from each other:

- Respect the principles of diversity and equity and the personal dignity of your colleagues.
- Treat your colleagues as you would want them to treat you with trust and tolerance.
- Do not discriminate against people on the grounds of nationality, ethnicity, race, colour, faith, religion, gender, age, disability, political opinion, marital status, parental status, social origin, sexual orientation or any other legally protected status at any time (before, during or after employment).
- Do not harass or abuse anyone or engage in any other behaviour that could create a hostile work environment.

Fair working conditions

Sobi provides fair, competitive pay and paid time off/leave benefits, consistent with local law and market practice. Sobi ensures fair and transparent performance evaluations, and offers equal career development opportunities at all levels.

”We respect individuals’ rights”

Freedom of association and right to collective bargaining

We maintain a constructive relationship with employees by communicating openly and honestly. Sobi employees and temporary personnel are free to form, join, or refrain from joining organisations that represent their interests, and we fully respect the legal right to engage in collective bargaining. Individuals will not be subjected to intimidation or adverse treatment for exercising these rights.

What we expect from each other:

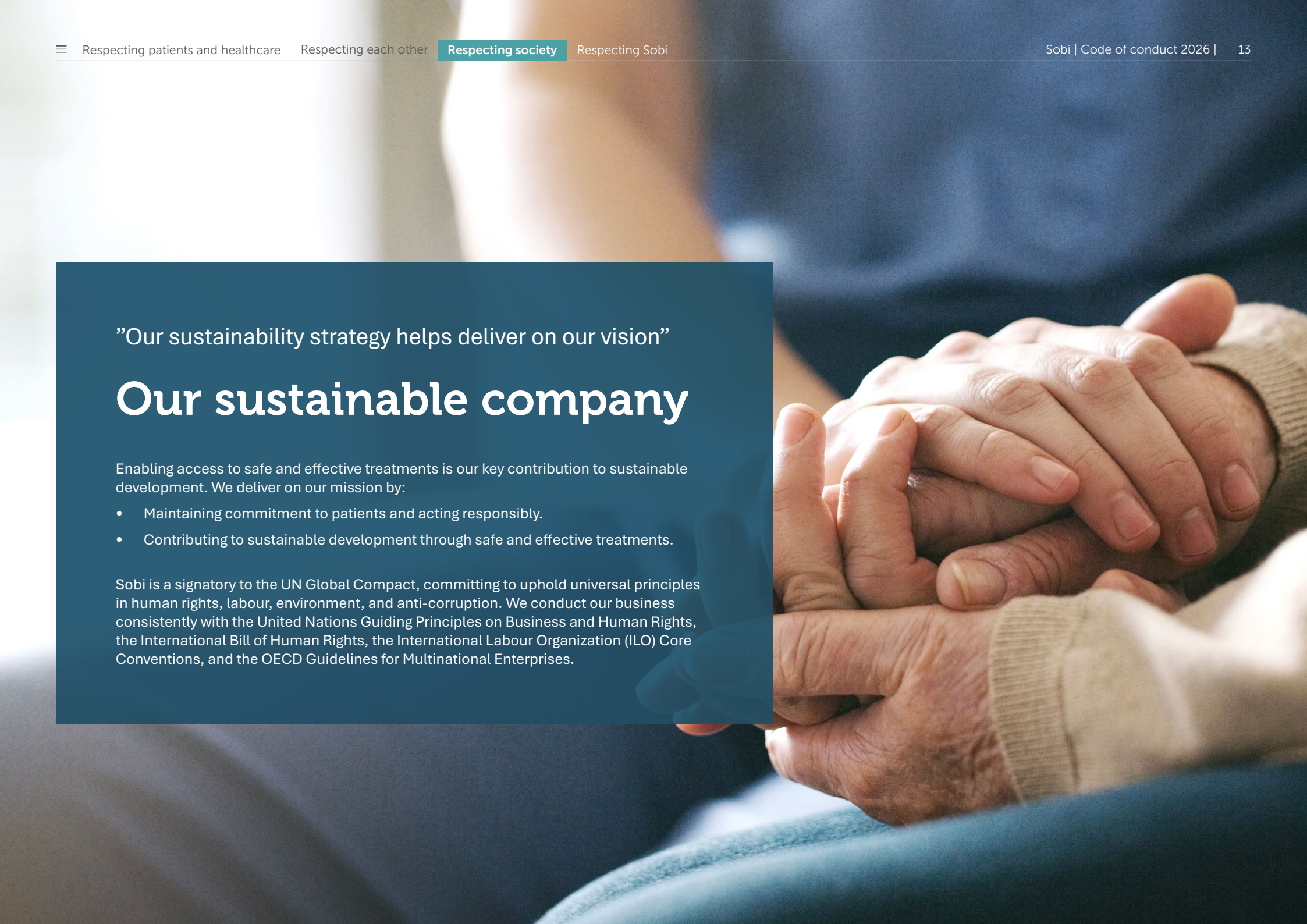
- Respect the rights of colleagues to choose whether or not to join a trade/ labour union or similar employee organisation and allow them to engage in lawful protected concerted/collective activities without interference.

Protection of personal information

Our employees, patients, customers, partners, and all others we interact with can rely on us to process personal information in a responsible and secure manner. We collect personal information only for legitimate business purposes and by lawful means and will not disclose or use it for purposes other than a legitimate business purpose or as required by applicable law. We protect personal information by reasonable security safeguards against accidental loss or destruction or unauthorised access, use, modification or disclosure. See the Sobi Policy on Processing of Personal Data.

What we expect from each other:

- Only process personal information for legitimate business purposes, by lawful means, and in compliance with our policies and any notice provided or consent obtained.
- Ensure any third-party service provider you work with accepts Sobi’s applicable privacy standards and legally approved contracts.
- Report any suspected data privacy or security incident immediately so the company can respond quickly and mitigate harm.



”Our sustainability strategy helps deliver on our vision”

Our sustainable company

Enabling access to safe and effective treatments is our key contribution to sustainable development. We deliver on our mission by:

- Maintaining commitment to patients and acting responsibly.
- Contributing to sustainable development through safe and effective treatments.

Sobi is a signatory to the UN Global Compact, committing to uphold universal principles in human rights, labour, environment, and anti-corruption. We conduct our business consistently with the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, the International Labour Organization (ILO) Core Conventions, and the OECD Guidelines for Multinational Enterprises.

”We respect human rights across our global operations”

Our human rights statement

We recognise our responsibility to uphold high ethical and human rights standards in all aspects of our operations and sphere of influence. We consider the impact of our activities and decisions on everyone working for Sobi and on those around us, and we aim to conduct our business in a way that does not cause or contribute to harm, whether through our operations, partners, or related activities.

We work to identify, prevent and mitigate negative impact on human rights, and we are committed to providing appropriate remediation for any adverse human rights impact for which we are accountable.

We support and respect the protection of applicable national and internationally adopted human and labour rights. In our daily business and throughout our operations, we operate consistent with international declarations and conventions including:

- The UN Guiding Principles on Business and Human Rights
- The International Labour Organization’s Declaration on Fundamental Principles and Rights at Work
- The United Nations Convention against Corruption
- The OECD Guidelines for Multinational Enterprises

We support the Political Declaration on Universal Health Coverage (UHC) adopted by the UN member states and we recognise the special needs of the rare disease community as mentioned in the UHC declaration.

Zero tolerance of child or forced labour
We do not tolerate child labour in any form. We will not employ or accept employment by our business partners of any person younger than the statutory minimum age for employment according to the UN Convention on the Rights for the Child. We do not accept or apply forced, compulsory, or involuntary labour, or labour by trafficked people, in any form. We do not extract work or service from anyone under the threat of any penalty, nor require anyone to work against their own will.

What we expect from each other:

- Respect and uphold the human rights of all individuals whose lives or work are connected to Sobi’s operations, partners, or related activities.
- Identify, prevent, and mitigate potential negative human rights impacts wherever they may occur in our operations or value chain.
- Report immediately any suspicion that a supplier, contractor, or partner may be using child, forced or trafficked labour.
- Do not work with partners who refuse to respect internationally recognised human rights standards.

”We respect the environment”

Environmental responsibility

We take evidence-based, proactive steps to assess, minimise and disclose the environmental impact of our activities and products across their entire lifecycle. We use scientific insights and structured risk assessments to identify potential harms early and to guide responsible decision-making in our operations and supply chain.

We protect land, water, air, natural resources, biodiversity, and the climate by complying with environmental laws, following expert scientific recommendations, and continuously improving our practices. We expect our suppliers to act with the same level of environmental and human-rights due diligence, and we collaborate with suppliers, contractors, and other stakeholders to raise standards and reduce impacts, and promote sustainable, responsible business practices throughout the value chain. See our Environmental Policy and Partner Code of Conduct.

What we expect from each other:

- Take responsibility for environmental impacts within your area of work and apply the precautionary principle to prevent harm and avoid risks.
- Report immediately any activity, condition, or incident that could seriously harm the environment or deviate from Sobi’s standards or policies.
- Use resources such as energy, water, materials, and chemicals efficiently and responsibly, seeking to minimise waste where possible.
- Do not bypass environmental controls, safeguards, or required risk-assessment steps, even when under time pressure.

”We prohibit corruption and select Third Parties carefully”

Anti-bribery and anti-corruption

We act in accordance with all anti-bribery and anti-corruption laws and will not engage in any form of bribery or corruption. We ensure that relationships with public officials are legitimate, and we manage the risk that those acting on our behalf – such as partners and agents – do not engage in bribery or other corrupt practices. See our Anti-Bribery and Anti-Corruption Policy.

What we expect from each other:

- Do not offer, promise, give, accept, or request any improper benefit (including money, goods, hospitality, gifts, etc.) to or from any third party in order to improperly influence or reward behaviour to obtain or give an improper business advantage.
- Be aware that Sobi may be held liable for the actions of third parties acting on our behalf, and ensure that Sobi due diligence procedures are followed to manage such risk.
- Conduct interactions with all third parties with integrity and transparency, in accordance with applicable laws and industry codes, and keep accurate records of all transactions.

Third-Party Due Diligence and selection

We carefully select all suppliers and third parties to ensure they share our commitment to ethical business practices. All third-party engagements must comply with Sobi’s sourcing and procurement processes, including due diligence and risk assessments. See the Sobi Procurement Policy, Anti-Bribery and Anti-Corruption Policy, and Partner Code of Conduct for detailed requirements.

What we expect from each other:

- Ensure that suppliers and third parties we engage are subject to appropriate due diligence as required by Sobi policies and procedures.
- Escalate concerns about supplier conduct to Procurement, Compliance, or Legal.
- Do not engage or continue to work with suppliers who refuse to meet Sobi’s standards or who fail to cooperate with remediation efforts.

”Our decisions are guided by integrity, not by personal benefit”

Gifts, Meals, Hospitality, and Entertainment

Gifts, meals, and entertainment must never be intended or perceived to improperly influence business decisions or create a sense of obligation. Any such interactions must be infrequent, reasonable in value, clearly linked to a legitimate business purpose, and fully compliant with Sobi’s policies and approval processes. Employees must exercise sound judgment and avoid situations where even well intended gestures could be misinterpreted as attempts to gain an unfair advantage. See the Sobi Travel and Expense Policy and Anti-Corruption Policy.

What we expect from each other:

- Ensure any permitted gifts, meals, entertainment or hospitality provided or received are lawful, appropriate in value, infrequent, and directly related to a legitimate business purpose.
- Record and report all gifts, meals, hospitality and entertainment as required by company policy and applicable transparency reporting requirements.
- Do not offer or accept gifts, meals, entertainment or hospitality that are lavish, unlawful, inappropriate, or that could be perceived as an attempt to influence a business decision.

Special Considerations for Government Officials and Healthcare Professionals

- When providing meals or hospitality to government officials or healthcare professionals, you must ensure that all interactions comply with local laws, industry codes and Sobi policies. Gifts and entertainment are generally prohibited, and must comply with Sobi policies and applicable laws and industry codes.

”We conduct our business fairly and conduct trade compliantly”

Fair competition

We compete fairly and do not engage in practices that may damage competition. We make independent decisions, avoid coordination or information-sharing with competitors that could influence pricing, markets, or strategy, and avoid behaviour that could unlawfully restrict fair market choices for customers or patients. We act in accordance with all applicable competition and antitrust laws. See the Sobi Policy on Fair Competition.

What we expect from each other:

- Do not impose resale price restrictions on wholesalers, distributors, licensees, or any other party without prior internal legal review and approval.
- Do not exchange information or agree with competitors on pricing, market allocation, business strategies, or any other competitively sensitive information.
- Do not engage in conduct that unlawfully restricts trade or customer choice or unlawfully disadvantages competitors (e.g. monopolization).
- Be cautious during industry meetings, conferences, trade associations, or informal gatherings where competitors may be present.

Trade compliance

We comply with all relevant laws and regulations when importing and exporting products, materials, and technology, with specific controls applied to sanctioned countries and restricted parties.

What we expect from each other:

- Follow all applicable import/export laws, including sanctions and restrictions for specific items, countries and third parties.
- Ensure accurate customs declarations, product classifications, documentation, and licenses.
- Do not use Sobi facilities, systems, funds, or shipping services for prohibited or restricted items, including illicit drugs, weapons, hazardous chemicals, or counterfeit goods.

”We are politically neutral”

Interactions with political parties and public policy

Sobi is politically neutral. We do not make payments or donations of any kind to political parties, candidates, or their institutions, agencies, or representatives.

We may engage in policy debates on subjects of legitimate concern to our business, our employees, and the communities in which we operate. Policy engagement is a legitimate activity carried out by selected authorised Sobi employees. Nothing restricts lawful personal and private political activity on personal time and expense.

What we expect from each other:

- Maintain Sobi’s political neutrality in all communications and follow all local laws governing public policy engagement, including lobbying registration where required.
- Report any request for improper influence, donations, or favours immediately to your line manager and legal or compliance personnel.
- Do not make political donations, gifts, or payments on behalf of Sobi directly or indirectly or use company resources or time to support political campaigns.

”We cooperate appropriately with authorities”

Cooperation with authorities

Sobi cooperates fully and truthfully with government authorities, regulators, and law enforcement officials conducting proper inquiries. Compliance with applicable laws includes an obligation to respond honestly and in a timely manner to lawful requests from regulatory and enforcement agencies. We expect every employee to support Sobi in meeting these obligations.

What we expect from each other:

- Immediately notify the Legal Department if you are contacted by any government authority in connection with a non-routine inquiry, investigation, or inspection.
- Do not alter, destroy, conceal, or remove any documents, records, or data that may be relevant to any government investigation, regulatory inquiry, or legal proceeding whether pending, anticipated, or ongoing. Comply with any legal hold instructions issued by the company.

”We manage conflicts of interest”

Conflicts of interest

We ensure that our personal relationships and outside activities do not influence or appear to influence our decision-making, judgment, or conduct of Sobi business. We must be proactive in identifying, disclosing, and managing potential conflicts.

Conflicts can arise from financial interests, outside employment, personal relationships, or the receipt of gifts or benefits.

What we expect from each other:

- Always act in the best interest of the company and avoid any action or situation that may conflict with Sobi’s interests.
- Disclose any actual, potential, or apparent conflict of interest promptly to your line manager and HR. If in doubt, disclose.
- Recuse yourself from any decision-making process where you have a conflict and follow any mitigation measures determined by the company. Update your disclosure if circumstances change.
- Do not engage in any outside business activity that may interfere with your responsibilities to Sobi without prior written line manager and HR approval.

”We maintain correct records and conduct transactions properly”

Company records and disclosures

Correct financial reporting enables Sobi to be a trusted player in the marketplace. All business transactions and financial records must be accurate. This includes documents, data, emails, approvals, laboratory notes, research data, financial information, quality records, and any other materials created or retained in the course of work. Sobi does not tolerate fraud in any form (deliberate deceit to obtain an unauthorised benefit).

What we expect from each other:

- Maintain accurate, complete, and timely records that reflect the true nature of activities and decisions and record all transactions accurately and properly in accordance with GAAP (generally accepted accounting principles).
- Comply with all applicable laws and regulations and company policies concerning corporate accounting, corporate records and disclosures.
- Do not make false, inaccurate, or fictitious entries in any records, or create misleading or incomplete documents, including time entries, research data, financial records, or contractual files.

Integrity in our financial transactions

Sobi is committed to responsible and transparent tax practices. We pay and report taxes accurately and on time in every jurisdiction where we operate, and we ensure that all transactions have a genuine business purpose or economic rationale. We do not attempt to evade taxes or facilitate tax evasion by others - whether employees, or third parties - and we comply with all applicable legal frameworks.

Sobi complies with all applicable anti-money laundering and counter-terrorist financing laws and will not knowingly facilitate money laundering or terrorist financing. We are committed to understanding the identity and legitimacy of the parties with whom we do business.

What we expect from each other:

- Be vigilant for signs of fraud, tax evasion, financial irregularities, or suspicious transactions and report any concerns immediately to Legal or Compliance and Finance.
- Ensure that all financial transactions are accurately documented, supported by appropriate authorisation, and reflect a genuine business purpose.
- Apply diligence when onboarding or transacting with third parties and verify the legitimacy and identity of counterparties.

”We use information and technology responsibly and protect our assets”

Information security, technology, and AI

Sobi is committed to protecting the confidentiality, integrity, and availability of data and systems that support our operations. We use Sobi technology primarily for business purposes, in line with security, privacy, and good practice (GxP) requirements, and we encourage the responsible use of artificial intelligence (AI) with appropriate human oversight. Every employee plays a key role in preventing unauthorised access or data breaches. Sobi may monitor use of IT systems and devices in accordance with law and policy. See the Sobi Information Security Policy and Global IT policy.

What we expect from each other:

- Protect Sobi data and systems by following our security policies, procedures, training and guidelines. Do not use personal devices or private email or other messaging platforms for creating or storing Sobi business records.
- Access only the information we need to perform our job using company provided devices, software and systems. Use confidential information only for the purposes of our work duties at Sobi.
- Immediately report suspected security incidents, breaches, phishing attempts, or data loss (including lost or stolen devices).
- Do not disclose company or third-party confidential information to unauthorised individuals, even after your employment with Sobi ends. This includes sharing confidential company data on personal cloud services or social media.
- Do not deploy AI systems without proper validation and approval.
- Use validated and approved AI tools only and in compliance with company policies, guidelines, and applicable laws. Validate AI outputs before acting on them and apply human oversight for higher-risk decisions, such as those affecting patient safety, regulatory compliance, or rights of individuals.
- Do not deliberately use AI systems that are biased or not fair.

Respecting the company’s assets

We protect all confidential information, including trade secrets and business or technical information about Sobi, our products, and our partners.

Intellectual property - such as patents, designs, copyrights, trademarks, know-how, data, and technical knowledge developed or obtained through research, development, or other activities - are vital assets. We safeguard our intellectual property and cooperate in the establishment, maintenance, and protection of our intellectual property rights.

Equally, third parties can expect us to respect and protect their confidential information and intellectual property.

What we expect from each other:

- Respect and protect intellectual property rights, including patents, trademarks, copyrights, designs, know-how, and data, whether owned by Sobi or by third parties.
- Report promptly any suspected misuse, unauthorised disclosure, or potential infringement of confidential information or intellectual property.
- Seek guidance from your manager or the Legal department if you are unsure whether information is confidential or how it may be used or shared.

”We engage in responsible digital communciations”

Social Media and Digital Communications

Social media and digital platforms carry significant risks to reputation, regulatory compliance, and confidentiality. Employees must exercise sound judgment, protect confidential information, and ensure all digital engagement is professional, accurate, and consistent with Sobi’s policies. See the Sobi Communications Policy.

What we expect from each other:

- Think carefully before posting and remember that online content can be permanent, public, and widely shared.
- Comply with all applicable laws, regulations, and industry codes, including those governing the promotion of pharmaceutical products, when posting or engaging with content.
- Do not respond to adverse event reports, product complaints, or medical inquiries on social media. Instead, direct such communications to the appropriate internal teams in accordance with internal policies and training.

”We communicate appropriately with investors”

Communicating to our investors

Sobi’s communications must be accurate, reliable, timely, and up-to-date. Our investors can expect us to comply with all applicable laws and regulations concerning communication and financial disclosures, including regulations restricting insider trading. See the Sobi Communication Policy and the Insider Policy.

What we expect from each other:

- Do not trade in Sobi securities (or advise others to trade) while in possession of material non-public information concerning Sobi or any company transacting business with Sobi.
- Treat all material nonpublic information as strictly confidential and limit access to a need to know basis (under legally approved contracts if externally shared). Seek advice if unsure whether information constitutes material nonpublic information.
- Direct external investor or financial inquiries to authorised Sobi spokespeople.

“Each of us plays a role in upholding our Code of Conduct and standards so that we earn the trust to deliver on our promise to patients.”

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[Approved by the Board of Directors, 2026.]
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