



Code of Business Conduct and Ethics

March 2021

Dear Colleagues,

The mission of Nobelpharma America, LLC is unique as we occupy a space in the Pharmaceutical and Medical Device industry designed to improve the lives of people living with diseases with little or no other treatment options. This uniqueness extends beyond the products we provide and is demonstrated by our employees in all that they do. This shared passion creates unity around our mission, vision and values. Our mission to fulfill unmet medical needs is life changing for people around the world and is what inspires all of us to excellence. We expect our NPA team members to demonstrate this excellence in all they do.

Our values driven culture is a top-down approach with compliance at the core and cascading out in all we do. This compliance centered approach is critical to our success in bringing our products to the patients who need them. I am not only proud to maintain this culture to ensure our growth and sustainability but also proud to be a part of team that uncompromisingly supports this important value. It is a high bar but one we all believe in.

As we continue to build our company, and deliver quality products, this Code of Business Conduct and Ethics is an excellent resource to address questions you may have. Please take the time to review this Code carefully, as you will come away with a greater understanding of ethical conduct and NPA's values. Doing the right thing for the right ethical reasons will continue to build a foundation of trust and confidence for our employees, our patients, our customers, and the public.

Respectfully,

Yoshiki Kida

Our Mission

“Contribute to Society by Providing Critical but Neglected
Pharmaceuticals and Medical Devices”

Our Vision

We keep our commitment to the field of unmet needs rather than therapeutic fields from a patient perspective. Putting ourselves in the position of the people who are looking forward to our research progress, we focus assiduous efforts on research and development of drugs and medical devices for unmet needs, such as drugs for intractable and/or rare diseases.

Our Value

We keep up to further evolve by developing First-In-Class (world most innovative) and Best-In-Class (world best) drugs and medical devices, aiming to launch our products in the U.S. Our efforts continue in order to "contribute to society by providing critical but neglected pharmaceuticals and medical devices."

Management Policies

1. General

- Share the Mission, Policies and Action Criteria among all stakeholders (employees, shareholders, officers)
- Pursue the evolution of the Company, yet becoming larger is not our main goal
- Comply with regulations and ethical codes
- Ensure transparency and disclosure

2. Personnel

- Value employees and families, and respect self-development
- Value employees as being a select few, and create an environment where they can enjoy working
- Value suggestions and opinions from employees

3. Products

- Pursue high quality in products and data
- Ensure post-marketing safety
- Search for product seeds externally

4. Capital

- Profits come as a result of and mean to achieve the Mission
-

- Focus on a higher return on sales/profits per employee
- Keep in mind the disadvantages of failure, not just the assumption of success when making investment decisions
- Profits are distributed to shareholders (dividends), employees, and to internal reserves
- Asset management only with a principal guarantee

Action Criteria

1. Principle

- When in doubt, the patient benefit takes priority

2. Our Challenges

- You never know how it will turn out unless you try, but do not hesitate to cut losses
- Even if there is no precedent, be the first to try it

3. Speed

- Never forget patients are waiting
- Set a deadline first by date
- If failed, learn from experiences for the next chances
- Speedy decisions by Department managers

4. Cost/Efficiency

- Never carry/purchase deadwood, never take/cause wasteful actions
- No overtime work is considered good
- Consider patient needs, scientific rationality and laws/regulations when pursuing higher quality in products/data
- Pursue cost reduction with the principle of multiple sources, while regarding providers as partners

5. Communication/Relationship

- Never prioritize loyalty to company over morals
- Rejecting inter-departmental advice and cooperation is a symptom of Big Company Disease
- Superiors to confidently entrust tasks to subordinates, but never leave unmanaged
- Hear anyone out, never interrupt in the middle
- Start with a conclusion when explaining/responding
- Greetings may seem small, but they are important

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Purpose

This Code of Business Conduct and Ethics (the “Code”) provides guidance to help us make the right ethical decisions while conducting business on behalf of Nobelpharma America, LLC. (“Nobelpharma America, LLC” or the “Company”). The Code is also a tool to help us apply our values to specific situations that we may face and applies to all directors, officers, employees, and contractors of the Company.

The Company has issued this Code to reflect its firm commitment to compliance and to demonstrate its belief in the highest standards of ethics and integrity. It also serves as a guide to help us achieve our goals and set expectations by highlighting many of the laws, rules and regulations that affect our industry. More importantly, it helps protect our reputation by assuring our customers, business partners, investors and patients that together we are committed to a culture of ethics and compliance.

This Code is designed to guide our business behavior and covers a wide range of business policies and standards but does not cover every issue that may arise. In addition to what is found in this Code, all of us at Nobelpharma America, LLC are responsible for knowing and following the laws and regulations and Nobelpharma America, LLC policies and procedures that apply to the work we do. You are expected to be familiar with the rules and regulations that affect your particular job.

This Code can also be found on the Nobelpharma America, LLC website www.nobelpharma-us.com

Asking Questions

During the course of your responsibilities at Nobelpharma America, LLC, if you are faced with a difficult business decision that is not addressed in this Code or any Company policies, or if you witness something that you feel may be a potential violation of the Code or any Company policies, ask yourself the following questions:

- Am I violating any laws or a Nobelpharma America, LLC policy or procedure?
- Is it honest and fair?
- Is it in the best interests of Nobelpharma America, LLC?
- What is the right thing to do?
- Am I treating others the way they want to be treated?
- How does the way I treat others make me feel about myself and Nobelpharma America, LLC?
- Could my decision or action appear improper if published on the front page of a newspaper or discussed on the news?

If you know it is wrong, do not do it. If you feel uncomfortable about a situation or have any doubt about whether it is consistent with Nobelpharma America, LLC’s high ethical standards, you should seek guidance from your Supervisor, Human Resources, member of the Leadership Team, the Head of Compliance or the CEO.

Raising Concerns/Reporting Issues

Asking questions and reporting possible violations of the Code or any Company policy helps protect Nobelpharma America, LLC and ensure we all act ethically and responsibly. As a Nobelpharma America, LLC employee, you are required to report internally any actual or suspected violation by anyone of this Code, applicable laws, rules, and regulations or any of Nobelpharma America, LLC's policies or procedures. If you see something that you feel is not right, including something done by a contractor or vendor of Nobelpharma America, LLC, you have a responsibility to speak up.

You must report any actual or suspected violations to your Supervisor, Human Resources, member of the Leadership Team, the Head of Compliance or the CEO. While we hope you feel comfortable discussing any matter with your manager or any of these individuals, you may also report actual or suspected violations through our Compliance Line. The Compliance Line is managed by a third-party vendor, and is available 24 hours a day, 7 days a week at 844-408-0214 or <http://nobelpharma-us.ethicspoint.com/>. If you do not report anonymously, confidentiality will be maintained to the fullest extent feasible. The reported information is provided to the Head of Compliance who will take the appropriate action. You may follow up via the Compliance Line regarding your inquiry.

In addition, if a concern has been reported directly to you, you must promptly refer the matter to the Head of Compliance, either directly or through the Compliance Line.

Investigations/Non-Retaliation

Nobelpharma America, LLC is committed to a compliant culture and will promptly investigate all good faith reports of actual or suspected violations of the law, our Code, or any company policies, procedures. Violations of the law, our Code or any of Nobelpharma America, LLC's policies or procedures may result in appropriate corrective and/or disciplinary action, which may include termination of employment. As necessary, the Company may also report violations to the appropriate authorities.

Employees will never face retaliation for making a report in good faith. Retaliation is an act against someone who makes a good faith report or participates in an investigation. All forms of retaliation are strictly prohibited at Nobelpharma America, LLC. If you believe that you have faced retaliation for raising a good faith concern, you should contact your Supervisor, Human Resources, member of the Leadership Team, the Head of Compliance or the CEO. You may also use the Compliance Line if you so choose.

Compliance with Laws and Regulations

You are responsible for complying with all federal, state, and local laws, rules, regulations, regulatory orders, and industry codes applicable to our business. The Company is organized and governed primarily by U.S. laws, rules and regulations; however, whether you are engaging in business within or outside of the United States, you must comply with the laws, rules, regulations and regulatory orders of the United States, including the Foreign Corrupt Practices Act, Anti-Kickback Statute, False Claims Act, Health Insurance Portability and Accountability Act ("HIPAA") and U.S. import/export rules and regulations, in addition to the applicable laws of other jurisdictions. If compliance with this Code or any Company policies should ever conflict with the law, you must comply with the law.

You should always undertake to acquire knowledge of the legal requirements relating to your duties sufficient to enable you to recognize potential compliance concerns and to know when to seek advice from your supervisor or the CEO. In some instances, this may include knowing and understanding legal requirements related to the biopharmaceutical industry, antitrust, privacy and data breach, government contracting, export controls, and/or employment law.

Healthcare Industry Standards

Food and Drug Administration

The U.S. Food and Drug Administration (“FDA”) is the federal agency responsible for overseeing the safety of pharmaceuticals, biologics, medical devices, and other products under the Federal Food, Drug and Cosmetic Act (“FDCA”) and its implementing regulations. The FDA regulates many aspects of Nobelpharma America, LLC’s business, including aspects relating to research, development, manufacturing, distribution, marketing, and promotion of our products.

Safety and Quality

The safety of patients is the most critical aspect of our work. To safeguard our customers’ trust and NPA’s reputation, every employee is expected to demonstrate complete dedication to quality and safety.

Not only do we have an ethical responsibility to collect, process and evaluate any potential issues reported concerning our products, we also have a legal obligation to do so. For instance, FDA laws and regulations require that Nobelpharma America, LLC closely monitor all reports of adverse events associated with the use of the Company’s products.

The safety and quality of our products and services includes regulatory submissions, advertising, labeling, and promotional materials and activities, and other product and service requirements. The Company maintains operating procedures that are designed to ensure compliance with applicable laws and regulations related to such activities. Each employee is responsible for the quality of his or her work and for complying with these procedures.

Interactions with Healthcare Professionals

Healthcare professionals must determine the best course of care for their patients, and Nobelpharma America, LLC is committed to providing information to assist them in appropriate treatment decisions. This includes fair, accurate, and balanced product information, scientific and medical information, and safety information, as specified in the Company’s policies and procedures. When Nobelpharma America, LLC employees interact with healthcare professionals, we do so with honesty, fairness and integrity.

Nobelpharma America, LLC employees providing information about our products to healthcare professionals learn and understand the on-label use of the Company's promoted products. The on-label use is the use that is approved by the FDA as stated on the label. The FDA prohibits manufacturers from marketing or promotion a drug for an off-label use. Healthcare providers, however, may prescribe or discuss off-label information with their patients and the Company's Medical Affairs department may be able to respond to certain unsolicited requests for off-label information for a Company product but only according to Company policies and procedures.

Interactions with Government

Nobelpharma America, LLC is committed to conducting our business with all governmental authorities (both state and federal) and their representatives with the highest standards of business ethics and in compliance with all applicable laws and regulations, including the special requirements that apply to interactions with the government.

Company Standards

Employment Practices

The Company is committed to treating our employees and job applicants with respect and fairness. We pursue fair employment practices in every aspect of our business. You are expected to comply with all applicable labor and employment laws. The following is a brief summary of our employment policies and procedures and a more comprehensive summary can be found in our Employee Handbook:

- Anti-Discrimination - It is Nobelpharma America, LLC's policy to base all employment decisions without regard or consideration to any individual's race, religion, creed, color, national origin, ancestry, genetic information, physical disability, mental disability, medical condition, marital status, sex, age, citizenship, veteran status, sexual orientation, or any other basis prohibited by applicable federal, state or local law.
- Harassment – Harassment on the basis of an individual's race, religious creed, color, national origin, ancestry, genetic information, physical disability, mental disability, medical condition, marital status, sex, age, citizenship, veteran status, sexual orientation, or any other basis prohibited by applicable federal, state or local law is strictly prohibited.
- Anti-Retaliation - Nobelpharma America, LLC will not tolerate any form of retaliation against any employee for engaging in protected activity.

It is your responsibility to understand and comply with the laws, regulations and policies that are relevant to your job. You should contact the Supervisor, Human Resources, member of the Leadership Team, the Head of Compliance or the CEO to report any type of discrimination, harassment or retaliation or if you have any questions about the laws, regulations and policies that apply to you.

Confidentiality

The products, ideas, concepts, and other information we create and collect are important proprietary assets for Nobelpharma America, LLC. These assets may include, among other things:

- Financial data, marketing plans, and projections, including but not limited to sales and expense forecasts
- Propriety and technical information, such as trade secrets, patents, inventions, know-how, product plans, pricing information, and customer lists
- Information regarding corporate developments, such as business strategies, plans for acquisitions or other business combinations, divestitures, major contracts, expansion plans, financing transactions and management changes
- Clinical and regulatory information
- Clinical and medical data
- Personal information about employees, including personnel information
- Non-public information of customers, suppliers and others

We all have an obligation to protect sensitive and non-public information and must only use for company business purposes. We all have a duty to safeguard all confidential information, except when disclosure is authorized or legally mandated. If you need to disclose Nobelpharma America, LLC proprietary or confidential information to anyone outside of the Company, it may be done only after the appropriate confidentiality agreements are fully executed by both parties. Note that your obligations to protect confidential information continues after you leave Nobelpharma America, LLC.

When discussing or in possession of confidential information, you should always be aware of your surroundings. You should not discuss company business in the presence of employees or others who do not have a right or need to know. Employees should be particularly careful in public places, including restaurants, airplanes, and trains.

Obligations of confidentiality also apply to communications with the press or media. All requests from the press or other media for information should be referred to the CEO.

In addition, in terms of confidential and proprietary information of other companies, the following are our guidelines:

- Confidential or proprietary information of the Company, and of other companies, includes any information, whether or not in tangible form, that is not generally disclosed to the public and that is useful or helpful to the Company and/or which would be useful or helpful to competitors of the Company. Confidential and proprietary information must not be disclosed without permission and may never

be used for personal benefit or for the personal benefit of others.

- We should not receive or disclose any such proprietary and confidential information, except as expressly authorized by management and pursuant to written confidentiality agreements approved by the CEO. Because we may incur substantial liability if we improperly use or disclose information that has been provided to us in confidence, we should receive such information only when there is a clear business reason for doing so and then only under the terms and conditions of an agreement that protects both parties' interests. Employees must also abide by and comply with lawful obligations regarding confidentiality that they have to their former employees, such as restrictions on the use and disclosure of confidential information.

Anti-Trust and Competition Laws

Antitrust and competition laws are designed to protect free enterprise. These laws are based on the premise that the public interest is best served by vigorous competition and will suffer from illegal agreements or collusion among competitors. While these laws are complex and difficult to summarize, antitrust laws generally prohibit:

- Agreements, whether formal or informal, with competitors that harm competition or customers, including price fixing and allocations of customers, territories or contracts;
- Agreements, whether formal or informal, that establish or fix the price at which a customer may resell a product or that boycott customers or suppliers;
- Making unfair or misleading statements to disparage or undermine the products or services of a competitor; and
- The acquisition or maintenance of a monopoly or attempted monopoly through anti- competitive conduct.

Certain kinds of information, such as pricing, production and inventory, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be and regardless of the setting, whether business or social.

Antitrust and competition laws impose severe penalties for certain types of violations, including criminal penalties and potential fines and damages of millions of dollars, which may be tripled under certain circumstances. Understanding the requirements of antitrust and unfair competition laws of the various jurisdictions where we do business can be difficult, and you are urged to seek assistance from your supervisor or the Head of Compliance whenever you have a question relating to these laws.

Corporate Opportunities

You owe a duty to the Company to advance its legitimate interests. Thus, you may not take for yourself corporate opportunities that are discovered through the use of Company property or information or as a result of your position with the Company, unless such opportunities are first offered to, and rejected by, the Company. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business.

Participation in an investment or outside business opportunity that is directly related to our lines of business must be pre- approved by the CEO. If you have any questions about whether you can avail yourself of a corporate opportunity, contact the CEO.

Record Retention and Documentation

The Company must retain records for immediate use, as well as possible long-term use for litigation purposes, historical reference, contractual obligations, regulatory or legal requirements, or for other purposes as determined by the Company. Information must be stored in a secure manner and complete records identified, indexed for retrieval, securely stored, and disposed of in the appropriate manner and in accordance with Company policies, procedures and the law. You should also comply with Company records management policies and retention schedules. Requests by third parties (such as lawyers or governmental agencies), lawsuits, or other inquiries or issues may necessitate the need to hold records beyond normal retention schedules. It is Company policy to preserve any records relevant to a “Legal Hold” or any other “Hold Order” issued.

Consulting, Speaking, or Training Arrangements with Healthcare Professionals

The Company may, from time to time, enter into an agreement with an HCP to provide bona fide services to the Company. These services may include speaking at presentations or conferences, participating in advisory board meetings, providing general consulting services, training employees or conducting clinical trials or other research. Prior to entering into an agreement with an HCP, there must be a legitimate business or scientific need for the service that has been identified, demonstrated and documented. Compensation provided to HCP consultants and reimbursement for expenses must be reasonable and reflect the fair market value of the services being performed under the agreement. Compensation may not vary based on the volume or the value of the HCP’s past, present or anticipated business. Questions concerning such arrangements with HCPs should be directed to Corporate Planning.

Conflicts of Interest

A conflict of interest may arise when an employee’s private interest interferes, or gives the appearance of interference, with the Company’s interest. We all have a duty to avoid interests, investments, or associations in which a conflict of interest

might arise while acting as a Nobelpharma America, LLC employee.

The following are examples of situations that may create conflicts of interest:

- Employment by (including consulting for) or service on the board of a competitor, customer or supplier or other service provider. Activity that enhances or supports the position of a competitor to the detriment of the Company is prohibited, including employment by or service on the board of a competitor. Employment by or service on the board of a customer or supplier or other service provider is generally discouraged and you must seek authorization in advance if you plan to take a position which falls into any of these areas.
- Supervising, review or other influential position on the performance evaluation, pay or benefits of someone in a personal/family relationship such as a family member or significant other.
- Owning, directly or indirectly, a significant financial interest in any entity that does business, seeks to do business, or competes with us. This includes conducting Company business transactions with your family members. In addition to the factors described above, persons evaluating ownership in other entities for conflicts of interest will consider the size and nature of the investment; the nature of the relationship between the other entity and the Company; the employee's access to confidential information and the employee's ability to influence Company decisions. If you would like to acquire a new financial interest of kind described in this paragraph, you must seek approval in advance.
- Soliciting or accepting gifts, favors, loans or preferential treatment from any person or entity that does business or seeks to do business with us.
- Soliciting contributions to any charity or for any political candidate from any person or entity that does business or seeks to do business with us.
- Taking personal advantage of corporate opportunities.
- Any situation in which, without proper authorization, you are required or tempted to disclose, or do disclose, any intellectual property, confidential or proprietary information, or any trade secret of the Company.

Any business amenity should be consistent with customary business practice, Nobelpharma America, LLC policies, and should be reasonable and appropriate. It is your responsibility to use good judgment in this area and to know the policies, laws and rules that apply to you. As a general rule, you may give or receive gifts or entertainment to or from current or potential suppliers or collaborators only if the gift or entertainment could not be viewed as an inducement to, or reward for, any particular business decision.

Offering gifts, gratuities or entertainment intended to obtain sales or otherwise win favor or influence must be avoided with all parties with whom the Company does business. Reasonable noncash gifts, gratuities and entertainment of modest value are generally permissible business courtesies when dealing with non-

government customers. Such business courtesies should be reasonably related to a legitimate purpose and otherwise in compliance with the Company's procedures. Special rules apply when dealing with government procurement officials and questions regarding such rules should be directed to the CEO.

Offering or accepting bribes or kickbacks to secure business is not only strictly prohibited, they may also result in criminal prosecution and may constitute violations of the Medicare Fraud and Abuse regulations.

All gifts and entertainment expenses must be properly accounted for on expense reports.

You should make every effort to refuse or return a gift that is beyond these permissible guidelines. If you believe it would be inappropriate to refuse a gift or you are unable to return a gift, or if you have any questions about whether it is permissible to accept a gift or something else of value, contact your supervisor or the CEO.

Nobelpharma America, LLC requires that employees fully disclose any situations that reasonably could be expected to give rise to a conflict of interest. If you suspect that you have a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it immediately to your supervisor or the CEO. Having a conflict of interest is not necessarily a violation of our Code or Company policies but failing to disclose it is a violation.

Competition and Fair Dealing

It is the Company's policy to compete in the marketplace lawfully and ethically. Our commitment to fairness includes respecting the rights of our competitors to compete lawfully in the marketplace by abiding to all applicable laws in the course of competing. Although the spirit of these laws that are commonly referred to as antitrust/consumer protection/unfair competition laws is straightforward, their application to situations can be complex.

You are permitted to gather intelligence about companies from public sources such as their websites, published articles, price bulletins, advertisements, brochures or public presentations.

You must never use, or ask any third party to use, unlawful or unethical means such as misrepresentation, deception, theft, spying or bribery to gather competitive information.

You should have an understanding of these laws as they relate to your job function and notify the CEO if you have any questions.

Protection and Use of Company Assets

All employees are responsible for the proper use of company assets. This responsibility applies to all Nobelpharma America, LLC's assets, including your time, work and work product, cash and accounts, physical assets such as inventory, equipment, vehicles, computers, iPads/tablets, cell phones, systems, facilities and supplies, intellectual property, such as patents, copyrights, trademarks, inventions, technology, know-how, and trade secrets, and other proprietary or non-public information. Here are some general guidelines:

- You should use all reasonable efforts to safeguard company assets against loss, damage, misuse or theft
- You should be alert to situations that could lead to loss, damage, misuse or theft of company assets, and report any loss, damage, misuse or theft as soon as it comes to your attention
- You should not use, transfer, misappropriate, loan, sell or donate company assets without appropriate authorization
- You must take reasonable steps to ensure that the Company receives good value for company funds spent when dealing with outside vendors, consultants or contractors
- You should use, and safeguard assets entrusted to the Company's custody by customers, suppliers and others in the same manner as company assets

Access to Electronic Communications

The Company respects the individual privacy of its employees, but these privacy rights do not extend to any employee's work-related conduct or to the use of Company provided equipment, systems or facilities. Employees should not have an expectation of privacy with respect to company provided equipment or the use of personal equipment on or connected to Nobelpharma America, LLC's infrastructure. The Company's mobile electronic and/or digital devices, voicemail, and computer systems are the property of Nobelpharma America, LLC and, thus, are expected to be used primarily for job-related communications.

Although employees have individual passwords to access the systems, the contents of electronic communications are always accessible by the Company for any business purpose.

Public Communications

Nobelpharma America, LLC places a high value on its credibility and reputation in the community. What is written or said about Nobelpharma America, LLC in the news media and investment community directly impacts our reputation, positively or negatively. It is the Company's policy to provide timely, accurate and complete information in response to public requests, consistent with our obligations to maintain the confidentiality of competitive and proprietary information, and to

prevent selective disclosure of market-sensitive financial data. To ensure compliance with this policy, all news media or other public requests for information regarding Nobelpharma America, LLC must be referred to Nobelpharma America, LLC's Corporate Planning.

If you believe that any disclosure is materially misleading or if you become aware of any material information that you believe should be disclosed to the public, it is your responsibility to bring this information to the attention of the CEO.

Social Media

Protecting Nobelpharma America, LLC's image and reputation requires employees to use social media appropriately and responsibly, both professionally and personally. An employee posting online content or taking an action (e.g., sharing a post, rating a post or liking a post/comment), even on a personal account, must remember that this activity could be attributed to Nobelpharma America, LLC and negatively affect Nobelpharma America, LLC's image and reputation and/or jeopardize the company's compliance with applicable laws and regulations. Therefore, any employee who uses social media should do so responsibly and consider the potential consequences for Nobelpharma America, LLC.

Except as described below, employees and others working on behalf of the Company should not post content to any social media outlet that relates to the Company, a Company product, or the pharmaceutical industry without approval from the Company. This includes postings to bulletin boards, chat rooms, blogs, Facebook®, Instagram®, Twitter®, YouTube®, Snapchat® or any other forms of social media. Certain employees may be designated to post product or disease state information to company-controlled social media accounts when that content has gone through the proper review and approval process.

Employees may (at their discretion) add appropriate employment information to their LinkedIn profile or other similar social media sites.

Political Contributions and Activities

Nobelpharma America, LLC allows its employees to participate in the political process as individuals and on their own time. However, federal and state contribution and lobbying laws limit the contributions Nobelpharma America, LLC can make to political parties or candidates. It is the Company's policy that Nobelpharma America, LLC funds or assets shall not be used to make a political contribution to any political party or candidate, unless prior approval has been given by the CEO.

The following guidelines are intended to ensure that any political activity you pursue complies with this policy:

- Contribution of Funds – You may contribute your personal funds to

political parties or candidates. Nobelpharma America, LLC will not reimburse you for personal political contributions.

- Volunteer Activities – You may participate in volunteer political activities during non-work time. You may not participate in political activities during working hours.
- Use of Company Facilities – Nobelpharma America, LLC’s facilities may not be used for political activities (including fundraisers or other activities related to running for office) without the approval of the CEO. Nobelpharma America, LLC may make its facilities available for limited political functions, including speeches by government officials and political candidates, with the approval of the CEO.
- Use of Company Name – When you participate in political affairs, you should be careful to make it clear that your views and actions are your own, and not made on behalf of Nobelpharma America, LLC.

These guidelines are intended to ensure that any political activity you pursue is done voluntarily, with your own resources and on your own time. Please contact the CEO if you have any questions about this policy.

Environmental Health and Safety

The health and safety of our workplace and its impact on the environment is of utmost importance. Nobelpharma America, LLC is committed to providing a safe and healthy working environment for its employees and avoiding adverse impact and injury to the environment and the communities in which we do business.

You should strive to conserve resources and reduce waste and emissions through recycling and other energy conservations measures. You have a responsibility to promptly report any actual or suspected violations of environmental laws or any events that may result in a discharge or emission of hazardous materials. In addition, you are expected to comply with all applicable health, safety, and environmental laws and regulations, as well as Company policies.

Nobelpharma America, LLC is also committed to a drug-free workplace. The misuse of drugs or alcohol, both legal and illegal, while on company premises or business interferes with a safe, healthy and productive work environment and is prohibited. Nobelpharma America, LLC prohibits the use of illegal drugs and the abuse of legal drugs or alcohol, on its premises, in its vehicles and while conducting company business.

Data Privacy

Nobelpharma America, LLC respects the confidentiality of the personal information of its customers, patients, and employees and is committed to protecting and preserving the security, integrity, and confidentiality of this information. Always follow the Company’s policies and procedures for

receiving or sharing personal information of customers, employees, patients, or others. It is your responsibility to use good judgment in this area and to know the policies, laws and rules that apply to you.

Disclosure of Debarment, Exclusion and Other Restrictions

You are required to immediately self-disclose any information that might preclude your involvement in Company business operations. This includes any restrictions preventing involvement in federal health care programs. The Company reserves the right to screen employees, contractors or consultants for exclusion, debarment and other ineligibility in federal healthcare programs or government contracts.

Additional Information

Nobelpharma America, LLC employees are responsible for knowing and complying with the current laws, regulations, standards, policies, and procedures that govern our work. If you have any questions concerning the meaning or application of the Code of Business Conduct and Ethics, any Company policies, or the legal or regulatory requirements applicable to your position, it is your responsibility to seek guidance from your Supervisor, Human Resources, member of the Leadership Team, the Head of Compliance or the CEO.

Code of Business Conduct and Ethics

March 2021

Acknowledgment

- I acknowledge that I have received and read Nobelpharma America, LLC's Code of Business Conduct and Ethics.
- I acknowledge that I understand the standards, policies and procedures contained in the Code of Business Conduct and Ethics and that there may be additional standards, policies, procedures, and laws relevant to my position.
- I agree to comply with the Code of Business Conduct and Ethics and any other applicable Company requirements.
- I acknowledge that if I have questions concerning the meaning or application of the Code of Business Conduct and Ethics, any company policies or procedures, or the legal or regulatory requirements applicable to my position, it is my responsibility to seek guidance from my Supervisor, Human Resources, member of the Leadership Team, the Head of Compliance or the CEO.
- I acknowledge that neither this Acknowledgment nor the Code of Business Conduct and Ethics is meant to vary or supersede the regular terms and conditions of my employment by Nobelpharma America, LLC or to constitute an employment contract.
- If I become aware of a potential violation of law, regulation, this Code of Business Conduct and Ethics, or any Nobelpharma America, LLC policy by a company officer, director, employee, contractor, or vendor, I understand that I am required to report the suspected violation to my Supervisor, Human Resources, member of the Leadership Team, the Head of Compliance or the CEO or to the Nobelpharma America, LLC Compliance Line at 844-408-0214 or <http://nobelpharma-us.ethicspoint.com/>.
- I acknowledge that I must immediately report any concerns regarding harassment, discrimination or retaliation in the manner required by Nobelpharma America, LLC's Employee Handbook section specifically related Policy Prohibiting Harassment, Discrimination and Retaliation.
- I further certify that I am not aware of any activities that would violate this Code of Business Conduct and Ethics, applicable law, regulation, or Nobelpharma America, LLC policy or procedure since the start of my employment. If I am aware of any such activities I have reported them in accordance with the procedures noted above.

(print name)

(date)

(signature)