

DEBIOPHARM GROUP

Code of Conduct,
anti-bribery and
anti-corruption policy

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Debiopharm's Group Code of Conduct (the "Code") establishes the rules and behavior for all employees and third parties acting on its behalf. The principles set forth in this Code are commitments we take towards our partners and clients to demonstrate our highest integrity and compliance with all applicable laws in our business conduct.

We will not tolerate any deviation or violation of this Code.

1. Applicability

All directors, officer, and employees (whether permanent, fixed-term or temporary) of Debiopharm Group companies ("Debiopharm Group") are subject to this code.

2. Legal compliance

Debiopharm Group, all its employees and third parties acting on its behalf shall comply in every jurisdiction with all laws, rules and regulations in all operations and business activities. This includes compliance with all research, development, manufacturing, marketing and distribution laws, securities laws and anti-corruption (anti-trust) laws.

3. Bribery and corruption

Debiopharm Group condemns any form, active or passive, of bribery and corruption. All forms of corrupt business behaviors, illegal rebates, kick-backs, theft and granting of improper advantages will not be tolerated.

All employees and third parties acting on behalf of Debiopharm Group shall not provide, offer or promise any undue advantage to any domestic or foreign official, partner or third party.

Furthermore, all employees and third parties acting on behalf of Debiopharm Group may not accept an undue advantage or promise of such an undue advantage from any third party for the commission or omission of an act in relation to his function.

4. Gifts and benefits of any kind

All Debiopharm Group are instructed not to give or accept any gifts or benefits of any kind that may compromise their personal integrity and independence or Debiopharm's Group reputation risk or independence.

Giving or accepting gifts or benefits of any kind are always prohibited if Debiopharm's Group interests are at stake or if the professional impartiality of Debiopharm's Group employees are at risk.

Gifts and benefits of any kind may only be given or received where appropriate and where there is no risk of influencing business decisions. Gifts and benefits of any kind must be of low value.

In addition, small gifts may be accepted or given at special times of the year (Christmas, New Year) or at culturally recognized events.

5. Donations, sponsorships and marketing

All donations and sponsorships and all interactions with healthcare professionals, healthcare organizations, political parties, association or other organizations may be undertaken only in compliance with applicable laws.

The marketing and promotion of pharmaceutical and diagnostic products with healthcare professionals and healthcare organizations are highly regulated. Debiopharm Group will comply with all applicable laws and regulations and industry codes it adhered to.

All promotional materials and communications must be accurate and not misleading and comply with regulatory, legal and medical standards.

6. Fair competition

Debiopharm Group complies with law that protect free enterprise and fair competition and does not participate in unethical business practices such as deceptive marketing, unauthorized use of confidential competitor or customer information or the theft of trade secrets. Agreements or arrangements with competitors that aim to coordinate market behavior are prohibited. This also included allocating territories or specific customers as well as fixing or coordinating prices.