

Title: <b>Business Compliance and Ethics Code</b>			
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2020-08-26**INTRODUCTION TO THE CODE**

Orexo's ambition is to be recognized for the added value our products bring to our patients and we want to be a trusted partner for the way we work and operate delivering benefits for patients, society, shareholders and other stakeholders. The Code is a critical document to set Business Compliance and Ethical standards for Orexo. The Code applies to all directors, officers, employees, consultants and temporary staff at Orexo AB and its subsidiaries (collectively referred to as "Employees").

In the Code, Orexo embrace and support the Ten Principles of the UN Global Compact on Human Rights, Labor, Environment and Anti-corruption.

**APPLICATION OF THE CODE**

- Management have the responsibility to ensure the Code, relevant supporting policies, standards, processes and procedures for Orexo are aligned with the laws and regulations in the countries in which Orexo operates and to provide assurance, support and guidance on compliance therewith.
- Every Employee is required to understand and comply with the Code, all applicable supporting policies, standards, processes and procedures effective in the countries where the Employee is working or operating on behalf of Orexo.
- Every Employee is expected to exercise good judgment and common sense in their doings to secure compliance with the Code, all applicable supporting policies, standards, processes and procedures, and must report any known, suspected or identified breaches thereof.
- Failure to comply with the Code, relevant supporting policies, standards, processes and procedures or the laws and regulations of the countries where we operate will be investigated and appropriate actions taken, like additional training, disciplinary action including termination of employment or assignment.
- In case of conflicts between internationally recognized standards and local legislation, Orexo shall manage such conflicts case by case, taking into account the risks and benefits for stakeholders and the general public.

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2020-08-26**RAISE QUESTIONS OR REPORT NON-COMPLIANCE**

- Every Employee are encouraged to ask questions if they are unsure of any content specified in the Code. Questions should be raised to the immediate manager – if so desired the Employee may pose questions directly to the HR or Compliance Officer.
- Every Employee has a duty to report any suspected non-compliance or violation without delay to the immediate manager – if this is deemed inappropriate the Employee may report directly to the HR or Compliance Officer.
- Anyone who reports a possible non-compliance issue in good faith will be supported by management and will not be subject to retaliation or any threat of retaliation. Retaliation or threat of retaliation will be considered as a violation of this Code in itself.
- Reporting of concern may also be made on the web or by letter, telephone or e-mail to:

**Orexo AB**

CEO's Office, Attn: Compliance Officer

Box 303

751 05 UPPSALA

Sweden

E-mail: [complianceofficer@orexo.com](mailto:complianceofficer@orexo.com)**Orexo US, Inc.**

Tel: +1-844-251-4251

Web: [www.orexo.ethicspoint.com](http://www.orexo.ethicspoint.com)

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2020-08-26**HUMAN RIGHTS**

Orexo recognize every individual's human rights and is committed to meet its responsibilities to respect internationally recognized Human Rights standards, as described in the International Bill of Human Rights and according to the fundamental rights set out in the International Labour Organization's Fundamental Principles and Rights at Work.

Orexo respect the personal integrity and values the personal data entrusted and is committed to collect, use, retain and disclosing personal data in a fair, transparent and secure way and according to applicable laws and regulations.

Orexo prioritize Human Rights within the supply of goods and services. Through the Supplier Code of Conduct, Orexo's standards and expectations are declared for business partners and risk management is integral in due diligence activities when interacting with other businesses.

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**LABOR AND EMPLOYMENT**

Orexo is committed to a safe and healthy workplace for all our Employees and visitors. Every Employee is expected to identify and understand the risks associated with their work, manage risks responsibly and only perform work for which adequate training has been provided. Orexo condemn any form of harassment or discrimination including such characteristics protected by applicable laws and regulations.

Orexo will comply with local employment standards and regulations applicable in the various countries where Orexo has Employees. Orexo respects the principles and standards regarding child labor, forced labor, freedom of association and minimum wages laid out in the UN Declaration of Human Rights as well as by the International Labour Organization.

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Orexo is committed to continuously reducing the environmental impact of its operations by identifying improvements in all parts of the product life cycles and support waste and emission reduction and energy-saving initiatives. Orexo works jointly with business partners, stakeholders and authorities to foster a greater environmental responsibility and as a minimum adhere to local and international laws and regulations.

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**PREVENTION OF CORRUPTION AND CONFLICT OF INTEREST**

Orexo and its Employees shall adhere to the highest standards of moral and ethical conduct, to respect local and international recognized laws and regulations and not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery.

No Employee may accept, offer or pay bribes or directly or indirectly accept gifts, hospitality, fringes or compensation in any form from a third party which may be unlawful or which could in any way affect his/her professional judgment in performing any duty or service for Orexo.

Employees may not engage in any activity that directly or indirectly compromises his or her independence or judgement, causing the interests of the employee or another person to inappropriately influence a decision, duty or service for Orexo or a third party.

Orexo does not allow direct or indirect engagement in, contributions or support to public policy or political activities, including governmental entity, political organization, party or candidate and policy advocacy organizations, on behalf of Orexo, except where ethically sound, permitted by law and where acceptable as part of local custom and practice, and approved under established company procedures.

It is particularly important to observe this with respect to national, local and international government officials, healthcare professionals and organizations, patients, suppliers and non-governmental organizations.

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Orexo is engaged in developing innovative solutions for new pharmaceutical products and will apply high ethical standards in all research and product development activities globally complying with all applicable laws and regulations, the Declaration of Helsinki, and recognized international standards keeping the safety and wellbeing of the patients of the pharmaceutical product in mind.

Animal testing should only be performed after consideration to replace animals, to reduce the numbers of animals used, or to refine procedures to minimize distress. Alternatives should be used wherever these are scientifically valid and acceptable to regulators.

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**PATIENT SAFETY AND BENEFITS**

Orexo is committed to continue to monitor the safety and efficacy of our products on the market to identify any change to their benefit-risk balance, keeping the appropriate regulatory authorities informed hereof and co-operate with them in taking any necessary actions.

Orexo is committed to ensure that every stage of the manufacture and supply of the pharmaceutical products are conducted so as to ensure that they fulfil their quality requirements, are fit for their intended use and secure their availability to the patients.

Orexo is committed to applying the highest ethical standards when providing information about our products and such information shall be supported by scientific evidence, be accurate and not misleading and provide a fair balance about product benefits and risks.

Orexo also recognize and put efforts into preventing and combat the growing problem of counterfeit and illegally traded pharmaceutical products, which can adversely affect the health and wellbeing of millions of people worldwide.