

keenova™



Our Code



Integrity

**Every Decision.
Every Moment.
Every Outcome.**

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Welcome from the Chief Executive Officer

Dear Colleagues:

At Keenova, we deliver proven medicines to patients with rare, stigmatized, or unaddressed conditions so they can live happier and healthier lives. We are privileged to serve these patients.

Our ability to fulfill this mission is grounded in how we conduct business every day, guided by our Code of Conduct and aligned with our values. Our Code of Conduct applies to all our decisions and actions at work and underscores our commitment to always act with integrity.

Everyone at Keenova is responsible for living our Code of Conduct and holding each other accountable for the same. I encourage you to always Speak Up and ask questions, raise concerns, and seek further guidance whenever needed.

In doing so, we can continue to earn the trust of our customers and the patients we serve every day.

Siggi Olafsson
President and CEO



Siggi Olafsson



A Message from the Chief Compliance Officer

Welcome to Keenova's Code of Conduct. This document is more than a set of rules – it's a reflection of who we are and how we work.

We succeed when each of us chooses **integrity – every decision, every moment, every outcome**. This is more than a standard; it's our commitment to one another, to the patients we serve, and to the future we're building. In a highly regulated industry, doing what's right is not only expected, it's essential to delivering life-enhancing products with the quality and care our patients deserve.

Our company value, **own every outcome**, is a call to action. It reminds us that compliance isn't something handled by one team or one department. It's owned by each of us – how we make decisions, how we collaborate, how we show up in big and small moments every day. When we act with integrity and respect, we build trust with one another, with our partners, and with the patients who depend on us.

This Code of Conduct is your ethical compass. It won't answer every question, but it will guide you in navigating complex situations. Three principles will help you live our Code every day:

1. Know the rules that apply to your role.
2. Act with integrity and respect in every interaction.
3. Speak up if something doesn't feel right – your voice matters.

Our Compliance team is always here to support you, but integrity begins with each of us. No policy or procedure can replace the personal responsibility we all carry to protect our business and strengthen our culture.

Thank you for your commitment to integrity and for owning every outcome. Together, we can continue to deliver with purpose and earn trust every day.



Susan Williamson

Susan Williamson
EVP and Chief Compliance Officer




Patients First. Doing What's Right. Always.

Our Commitment

At Keenova, we share a commitment to improving patients' lives.

We're driven by innovation and focused on patient-centered solutions. Making a difference is what drives us every day as we work to develop innovative therapies and technologies for patients. We see challenges as opportunities to change lives.


 **Our patients are the reason for everything we do.**



Our Code

At Keenova, we have one Code of Conduct that applies to everyone in our organization.

The principles in the Code set expectations for our conduct and describe how we interact with our colleagues, customers, vendors, and patients. The topics we cover here can have serious ethical, reputational, or legal consequences if handled incorrectly.

 **The Code is our foundation for getting it right.**

Why do we have a Code?

At Keenova, we conduct business with integrity and honesty and in compliance with applicable law.

Our Code sets standards we are all expected to follow. It's a clear statement of our expectations for how we conduct ourselves day to day.

Does the Code apply to me?

Yes, the Code applies to everyone who works at Keenova and members of Keenova's Board of Directors.

This includes all employees, including individual contributors, people leaders, senior leaders and officers, in all locations where we operate, whether in plants, offices or remotely.

We also choose to work with third parties who share the values and standards reflected in our Code.



How should I use the Code?

Know and **understand** the Code standards that apply to your work.

Any time you **need guidance** in an area covered here, **check the Code**. You must refer to the policies and procedures applicable to your role, which contain additional detail and guidance.

Don't be afraid to **ask for support** if there is something you do not understand or need help clarifying.

Any **waiver of the Code** for Executive Officers or Directors of Keenova must be approved by Keenova's Board of Directors or a Board committee, and will be promptly disclosed as required by law.

 **Our Corporate Compliance resources are here to help you get it right.**

What happens if someone violates the Code?

We view Code violations as a very serious matter.

Individuals who are found to have violated the Code or our policies will be disciplined, as appropriate, which may include termination of employment. In some cases, the individual's compensation may be subject to clawback, recoupment and/or recovery or there may be legal consequences for violating the Code.



Values & Culture

Our Values & Culture are the driving force behind everything that we do. We embrace a growth mindset, bringing together keen commitment and genuine kindness to fuel our collective ambition.



Own every outcome

- We hold ourselves and each other accountable to act with integrity
- Doing what's right in every moment

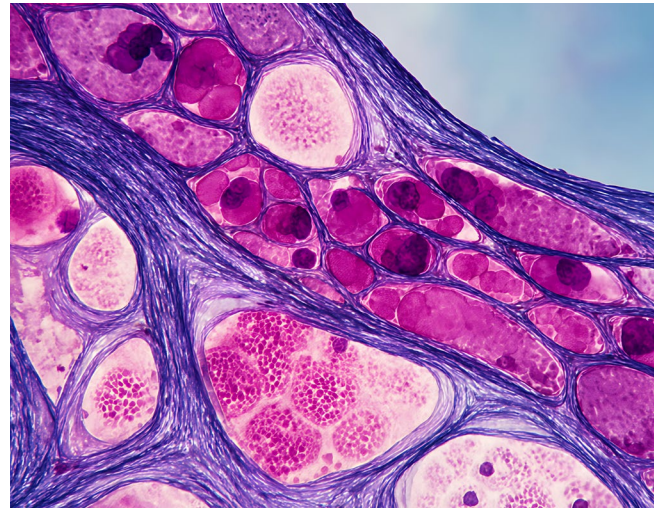


Step up

- We're determined to get it done
- Even if it's difficult and see it through

Be curious

- We ask, "What If?"
- Challenging assumptions to drive lasting progress.



Grow as one

- We show up for each other
- Celebrating our successes and learning from experiences as one team



Your Voice has Power

You Can Make a Difference

Our commitment to patients drives our business.
Our commitment to integrity drives our reputation.

Remember: You own every decision.

Violations of our Code or other policies undermine our shared values and pose risk to the Company and our employees.

Raising a concern helps us stop misconduct or prevent issues from happening in the first place.

Speaking up can make a huge difference for the Company and the individuals involved.

Doing what's right means we Speak Up.

Your Voice Has Power at Keenova.

Does something violate our policies? Does it just not feel right? **Use one of our Speak Up channels.**

Remember: One of our core values is to own every outcome.

If you are **concerned** about **someone else's actions**, we want to know. We will take your **report seriously**.

You don't have to be sure and you don't need to collect proof or substantiate your concern.

Speak Up Channels

Keenova offers several channels to raise concerns. You should use the channel that is most comfortable for you. Generally, your supervisor or manager may be in the best position to address an issue. However, that is not your only option. You can also discuss your concerns with or ask questions by contacting:

- Any Company manager, including your own
- Corporate Compliance
- Human Resources
- Legal
- Ethics Hotline
 - In the U.S.: 888-696-9864
 - Outside the U.S.: Find your local number at www.keenova.ethicspoint.com
- Ethics Website: keenova.ethicspoint.com
keenovamobile.ethicspoint.com
- Any other resources listed in the final section of this Code

SPEAK UP



If You Speak Up, We Will Listen

We take all reports seriously and respond appropriately.

We've established an objective process to review all concerns and determine the appropriate next steps.

When you Speak Up, we will guard your confidentiality.

We will share information only as needed to conduct an investigation and take appropriate action.

We prohibit retaliation when speaking up.

The Company will protect anyone who brings a concern forward in good faith. Your good faith report will not harm your future with the Company. The Company will not tolerate retaliation against anyone who raises a concern, reports misconduct, or provides information in an investigation. If you believe that you or another colleague has been retaliated against for any reason, report the conduct using any method described in this Code of Conduct.

Retaliation is adverse action that can take various forms, including unfavorable work assignments, unfavorable performance reviews, threats, harassment, demotion, suspension, reduced compensation, denial of benefits or termination, among others.

Reporting: How Does it Work?

1. Raise your concern

You may use any of our Speak Up channels to raise a concern or ask a question, including talking to any member of management. Reports will only be shared on a need-to-know basis, subject to applicable laws and regulations. You may choose to raise concerns anonymously to the extent permitted by law.

2. Initial Assessment

We typically review reports within 24-48 hours, and we will direct your question or concern to the appropriate resource, depending on the nature of the situation.

3. Investigation

We follow an objective process to review and respond to all reports. You may be contacted by an investigator for more information and expected to cooperate fully. A full investigation may take as little as one week, whereas more complex cases could take up to several months.

4. Case Outcome

Where possible, we will provide updates. However, to protect privacy, you may not learn the specific outcome of the concern you reported.



Integrity Drives Good Decisions

If you face a situation where you're not sure how the Code standards apply, review your possible actions and decisions through these three viewpoints:

Every Decision.

Does it:

- Reflect Our Mission?
- Promote patient quality of life?
- Support our commitment to product quality?

Every Moment.

Does it:

- Represent Keenova well?
- Reflect our brand standards of quality, integrity and service?
- Make you proud if it became public?
- Affect you, your teammates, the Company, or the public positively?

Every Outcome.

Does it:

- Align with our Code and policies?
- Feel right?
- Follow the law, industry codes and regulations?



Do You Manage Other Employees?

We rely on you to:

- Set a good example. Recognize that others will look to you to decide what's acceptable.
- Make sure your team knows about the Code and how to use it.
- Encourage employees to bring you questions or concerns. Make sure they know about the Ethics Hotline and other resources. Create an environment where your team feels comfortable speaking up.
- Take prompt action if employees raise issues. Escalate matters as appropriate inside the Company so we can address the issue.
- Never take retaliatory actions against someone for raising a concern. Report any retaliation carried out by others.

As a manager you have the responsibility to report any issues or concerns and to set the correct tone for your area of responsibility.



Create Safe and High-Quality Products

Keeping patients at the center of our mission keeps us focused on what matters.

At Keenova, our patients' health and safety is our top priority. We set high standards for our products, complying with all applicable regulatory requirements and maintaining a robust quality management system. We take personal responsibility for the work we do and meet or exceed what is required.

- Make **product quality and safety** a priority. Remember that we are accountable **to our patients** as well as **regulatory agencies** and **customers**.
- **Report any issues** that could compromise the quality or safety of our products. This includes, but is not limited to, **suspected counterfeiting** or **tampering** and **packaging or labeling issues**.
- Know how to **recognize** and **report** an **adverse event (AE)**, **complaint**, or **concern** about a product.

Adverse Event Reports (AERs) and Product Quality Complaints (PQCs) provide us with important information about our products that we can use to improve our products or alert patients, medical professionals, and regulatory authorities.

If you learn about an adverse event or product quality complaint, report it immediately (see final section for contact information). If you are unsure whether an adverse event has occurred or whether an incident is reportable, report it through the designated channels and allow our experts to make that determination.



Interact Ethically with Healthcare Professionals

Ethical relationships with healthcare professionals (HCPs) are critical to our mission. We want HCPs to have up-to-date, accurate information about our products so they can make informed treatment and prescribing decisions for patients' benefit. We are responsible for providing information that is accurate and not misleading and making only those claims that can be substantiated by the approved product labeling. We are also responsible for conducting promotional activities with integrity and acting with vigilance to keep them separate from non-promotional activities.

- Any statements you make about our products must be consistent with the approved label information. **Be truthful, accurate, balanced, and not misleading.**
- In promotional conversations, share **only the product information** that the Company has **approved for use**. Appropriate scientific exchanges in a non-promotional context should not involve anyone in a promotional role, including sales or marketing personnel.
- **Never provide** an **HCP** with **anything of value** that's **intended** to **influence, encourage, or reward** a prescribing or treatment **decision**.
- **Do not** provide an HCP with a **gift, entertainment or recreation**, even in a business context.
- If we hire an HCP for any reason, including as a consultant or speaker, the engagement must meet a **legitimate business need**, and the compensation must be **at fair market value**.

We must be very careful when providing an HCP with anything of value. Above all, we need to avoid even the appearance that providing anything of value is intended to influence someone's independent medical judgment.

Key reminders:

- Engage HCPs only when there is a bona fide need and always pay a fee that is consistent with the local fair market value for the service rendered.
- Never attempt to buy business or provide anything of value to influence a HCP's judgment to choose a Company product, whether it is real or perceived.
- Colleagues and business partners must never offer, promise, authorize or provide a payment or benefit that is intended to improperly influence a HCP, including but not limited to their decision on recommending or prescribing a Company product.
- Your interactions with HCPs and others in the healthcare community should comply with all applicable laws, regulations, professional requirements, or industry codes of conduct or practice, including local transparency requirements and antikickback regulations.
- Provide appropriate instruction, education and training on the safe and effective use of our products.



Interact Ethically with Patients and Patient Advocacy Groups

Patient advocacy groups are generally defined as independent not-for-profit entities that represent the needs of people living with medical conditions, their families, or other caregivers.

We share important goals with many patient organizations

We have a shared interest in the development of effective and innovative therapies and technologies to fight disease. To better serve our patients and their caregivers, Keenova may collaborate and/or provide support to patient organizations for education, awareness, and advocacy initiatives. Any engagement with patients and patient advocacy groups must address a legitimate need.

When interacting with patient advocacy groups you must adhere to the following:

- Clearly document all funding decisions, including the nature and purpose of the support.
- If we host meetings for patient organizations, choose an appropriate location that's conducive to business discussions and provide only modest meals and refreshments.
- Respect the independence of the patient advocacy groups and always avoid conditions in which we might appear to be exerting undue influence on them.
- The company should avoid being the sole funder.
- All interactions must be disclosed, including financial and non-financial support. Written

agreements should clearly outline the nature, purpose, and scope of collaboration.

- Engagements must be ethical, honest, and respectful. Avoid inducements or promotional messaging disguised as education.
- Patient data must be handled in compliance with applicable laws. Consent must be informed, and data use clearly communicated.
- Payments for services (e.g., advisory roles, speaking engagements) must reflect fair market value. Compensation should not be tied to product promotion.
- Engagements must have a clearly defined, patient-centered objective. Activities should aim to improve healthcare outcomes or access.



Innovate Responsibly

We innovate constantly to discover new solutions or improve the efficacy, safety, and health benefits of existing products. Our clinical research is designed to meet a legitimate unmet medical need or scientific question. Researchers are trained on study protocols, and trials are conducted in accordance with applicable laws and ethical standards.

- Work to ensure the **safety** of those who participate in **clinical trials**. **Protect** their **rights**, their **privacy**, and the **confidentiality** of information about them.
- Obtain **informed consent** from study participants **in advance** in accordance with the protocol. **Advise** participants of the **nature and purpose of our research** and **protect them** from unreasonable risk.
- Follow widely recognized industry **standards**, such as **Good Laboratory Practices** (GLP), **Good Clinical Practices** (GCP), and other laws and regulations.
- Practice **data integrity**. Make sure clinical research data is **truthful** and **accurate** and that it is **collected** and **maintained** in accordance with any **data protection laws** that apply.



Avoid Conflicts of Interest

We use good judgment, understand what's expected of us, and hold ourselves to high standards of integrity.

In our jobs, we need to be free to act in Keenova's best interest and able to make objective decisions. Conflicts of interest interfere with our ability to do this. A conflict happens when a personal interest gets in the way of our responsibility to the Company. It's important that, where possible, we take steps to avoid conflicts of interest, since even the appearance of a conflict can be damaging.

- **Be aware** of situations that can create a **conflict** or a perceived conflict — including relationships or activities that could affect your independent judgment in your work. Remove yourself from any situation that could even appear to affect your **decision-making**.
- **Consult** with your **manager, Legal, Human Resources, or Compliance business partner** before taking any outside job. In some instances, **outside employment is prohibited**, especially employment or consulting opportunities with a **competitor, customer, supplier, or vendor**. **Additionally**, seek prior **written approval** from the **Company before accepting a board position**, to avoid both **conflicts** and **distractions** from your work.
- **Remove yourself** from all **decision-making** in situations where someone with whom you have a close personal relationship works or seeks to do business with our Company and **disclose** the conflict to the Company.
- **Don't** use your Keenova position for **personal gain**.
- If you have a **conflict** — or even think you might — you must **disclose** it to the Company in accordance with the policy. The Company will assess whether there is a conflict and work with you to manage or **resolve it**.
- If you have a close personal **relationship** with **or financial interest** in a **vendor or supplier** who is being considered to provide goods or services, **disclose it**. You may be asked to recuse yourself from any related conversations.



Examples of actual or potential conflicts of interest:

Outside employment

Working a second job, especially one that competes or interferes with the work you do at Keenova.

Board service

Serving as a director on a board, including of a non-profit.

Financial interests and benefits

Using Company property, information, or position for personal benefit or holding a financial interest in a competitor, supplier, customer, or vendor.

Corporate opportunities

Taking an opportunity for ourselves that belongs to the Company or that you learn about due to your position.

Meals, Gifts, and Entertainment

Accepting a meal, gift or entertainment from a vendor who is performing or seeking to perform work for the Company could be perceived as the vendor improperly influencing decision making.

To avoid a conflict of interest, do not give or accept—directly or indirectly—in kind or in cash, gifts, entertainment or benefits of more than token value by local standards.

Close personal relationships

Making hiring or purchasing decisions about people with whom you have a close relationship.

What are close personal relationships?

Examples include:

- Close family members like your spouse, children, or grandchildren
- Extended family members like your or your spouse's parents, siblings, grandparents, aunts, uncles, cousins, nephews, or nieces
- And anyone else you share a close relationship within your personal life, including romantic partners

Not sure if something is a conflict?

Ask yourself: Am I doing what's best for Keenova?




Compete Fairly

We create fair and lasting business relationships built on high standards of ethical conduct.

A thriving marketplace benefits everyone, especially patients. At Keenova, we follow antitrust and competition laws in all countries where we operate and avoid unlawful actions that interfere with free and open competition. We conduct ourselves in a manner that avoids even the appearance of an antitrust violation.

- **Be truthful** about the **quality, indications, features,** and **availability** of our products. Never make false statements about competitors or their **products**.
- Keep competitors at arm's length. **Do not share** information about **pricing** or our business and do not coordinate any **sales activity** — including comparing or coordinating price increases or bids — with **competitors**.
- Gather competitive **information** only from **publicly available** or **syndicated data sources**. Never deceive others, misrepresent who you are, or get nonpublic information from someone who is not supposed to disclose it.
- **Remove** yourself from **uncomfortable** settings with **competitors**. Always **remove** yourself if **confidential, nonpublic,** or **sensitive information** is being shared.

 **If your job involves attending trade association meetings or standard-setting industry groups, be cautious in discussions and gatherings.**

Even a casual conversation with a competitor can be problematic. Avoid sharing any confidential, nonpublic, or sensitive information.

Complete any assigned Company training and avoid any competitively sensitive topics like:

- Pricing (e.g., pricing or discount strategies)
- Terms and conditions of sale
- Customer lists (actual or prospective)
- Nonpublic Company financial data (e.g., costs, profits, or sales)
- Future strategic commercial plans (e.g., research and development, mergers and acquisitions, new product releases, identified target markets, or marketing initiatives for particular products or customers)

 **If someone else raises a risky topic, object publicly and leave immediately.**

We do not engage in deceptive or inaccurate messaging. When we market, promote, or advertise our products, we are fact-based and accurate and follow all applicable legal requirements. We never mislead or omit critical information or present or distribute materials that have not been reviewed or approved by the Company.



Do Not Bribe

Bribery doesn't just put our Company at risk — it harms societies and reduces people's access to medicine. At Keenova, we stand against bribery and corruption globally. We will not offer or give anything of value to improperly gain a business advantage or reward someone for a favorable business decision. We also prohibit third parties from paying bribes or taking corrupt actions on our behalf.

- Win business **legally** and **ethically**. Never offer, give, solicit, or accept bribes or kickbacks. If you are asked for an **improper** or suspicious **payment, report** the request to the Company immediately.
- **Never** ask a third party to **take action** that our **Code** or **policies prohibit**, including paying a bribe.
- Follow our **due diligence** processes when hiring and working with **third parties**. **Fully vet** any business partners and **communicate** our **policies, procedures** and **expectations**.
- Make sure all financial transactions are properly accounted and documented—**never misrepresent** or **conceal an expense**.
- Do not give anything of value to a government official - unless you have preapproval through written consent from the Company, as especially strict standards apply.
- Do you know how to recognize a government official? The term applies to a broad range of people, not just those in elected or high-ranking roles.

Government Officials

- Any official or employee of a government agency, for instance, someone making tender decisions on behalf of a ministry of health
- A hospital president or member of the formulary committee for a national hospital
- A healthcare professional employed by a government owned or run hospital
- A professor or administrator at a government run medical school
- Any official or employee of public international organizations, including the World Health Organization, World Bank, and the United Nations
- An official of a political party and any candidate for a political office

Watch out for “facilitation payments.”

Our bribery policy also prohibits small payments to government officials to speed up or expedite an official action, even if the value is small.

If you can't give something to a government official directly, you also can't give it to a third party who might pass it to a government official or a family member of the government official



Prevent Money Laundering and Financial Crimes

Companies and individuals can seek opportunities to abuse common business transactions for their own benefit. This includes money launderers, who are looking to disguise criminal sources of funds, and people or companies attempting to improperly evade taxes. We want to do business only with parties who are engaged in legitimate business activities and get their funds through legitimate sources.

- Follow all **due diligence requirements** when working with **customers and business partners**.
- Take time to learn how a customer or business partner intends to use our products. **Watch** for **unusual** or **suspicious transactions**, including those that simply don't make sense.
- Report **suspicious transactions** to your manager or the Legal Department or through a **Speak Up channel**.

Signs of a potentially problematic transaction include:

- Refusing to provide information or providing false information
- Payments in cash or cash equivalents (e.g., money orders or traveler's checks)
- Requests to pay to or through a third party
- Requests to overpay invoices
- Requests to prepay invoices prior to services performed (unless contractually agreed upon)
- Invoices submitted without sufficient line-item detail
- Locations associated with terrorism or drug trafficking
- Transactions that are unusually complex or seem intentionally structured to avoid recordkeeping, internal controls, and reporting requirements
- Requests to bypass Company source-to-pay standard processes



Be Honest and Transparent with the Government

We operate in a heavily regulated industry and are expected to make complete, fair, accurate, timely, and clear reports and disclosures to government entities. Our colleagues who make these reports require the support and commitment of the whole Company to get it right.

- Always provide **accurate** and **truthful** information to **government** and **regulatory agencies** and the **internal teams** responsible for preparing our information.
- Fully **cooperate** with government **inspections, investigations, and audits**.
- Be **truthful**; never **conceal, destroy, or alter documents**; and never attempt to **interfere** with the process.
- Require any **third parties** you manage or direct to meet the **same standards**.
- If your work involves sales to the government, including tenders outside of the U.S., make sure you know all **procurement, sourcing, due diligence**, and other **requirements that relate to this work**.

 **Societies have a stake in seeing public money used responsibly.**

Thus, government contracting work carries several requirements, such as:

- Provide truthful, current, complete, and accurate information when making **submissions, certifications, or representations**.
- Never include inaccurate or out-of-date information in proposals, pricing data and estimates, invoices, or sourcing documents.
- Do not attempt to gain access to **confidential information** about the project or competitors' bids.
- Know that government contracts carry standards that can apply throughout our supply and distribution chain.



Observe Trade Controls

Keenova manufactures, distributes, and sells our products all over the world. We recognize that local governments have the right to establish trade controls to protect their national security and policy interests, and we take steps to comply with these laws wherever we do business, including embargoes and sanctions that apply to countries, individuals, and certain groups.

- We **import** and **export** controlled substances. Understand that the sale and distribution of these products are **heavily regulated** and require close coordination with those who **know** the requirements.
- Understand the import and export **risks** related to our **products, technology, destinations, and activities**. Do not participate in any activities that could **violate** trade **restrictions** or **sanctions**.
- **Do not** export our products or technology to **embargoed** or **sanctioned countries, destinations or individuals**, or **anyone else who represents a potential diversion risk or has other red-flag indicators**.
- **Conduct required screenings**. If there are any trade restrictions, work with Company experts to obtain all **required licenses** and **authorizations** before beginning the transaction.
- **Declare** accurate **customs** information when **shipping** products and comply with customs **laws** when transporting **Company material**.
- **Create** and **retain** appropriate **documentation** for **cross-border** transactions.

Finally, certain export laws may prohibit us from complying with aspects of other countries' boycotts. Be alert to boycott-related requests, including ones that are more subtle. If you receive one, report it to Legal and Compliance before taking any action to comply so the Company can respond appropriately.



Treat Others with Respect

We strive to “Grow as one”, fostering relationships that are built on mutual trust and respect.

At Keenova, we promote a respectful, collaborative work environment where everyone is valued for their unique talents and perspective. We all play a role in making our Company a rewarding place to work, including by consistently treating each other with dignity and respect. Harassment, intimidation, and bullying simply have no place here.

Harassment is unwelcome conduct that is based on or related to any characteristic or activity protected by applicable law.

- **Show respect** for others in your **words** and **actions**. Help promote **collaboration** and refuse to tolerate bullying.
- If you have a **conflict with a colleague, seek to resolve it**— directly with the person at first, involving their manager if needed. **Presume good intentions** and approach the situation calmly and objectively. If you don’t feel comfortable approaching the person directly, you can raise your concern using multiple channels such as your manager and Human Resources.
- Know that we **will not tolerate hostile, malicious, or intimidating conduct**. Do not use **abusive language** or act with **physical aggression**.
- Help maintain a **harassment-free workplace** by recognizing and reporting any harassing behavior. If you are the target, Speak Up. We can help.
- **Avoid jokes** or **statements** about topics or material others may find **vulgar, obscene, malicious**, or otherwise inconsistent with Company policy. **Don’t display, share, or email** content that would violate Company policy.

- Communicate with **respect**. **Do not** use **social media or email** to make statements or share content that is **bullying, harassing, vulgar, obscene, malicious, discriminatory, threatening, unlawful**, or otherwise inconsistent with Company policy.

We do not tolerate:

- Sexual harassment
- Verbal or physical harassment
- Racial harassment or harassment based on disability, veteran status, age, or any other protected characteristic
- Bullying
- Any other form of harassment or similar actions that create an unfair, hostile, or offensive work environment

These standards apply to all Company employees in all work-related settings and activities, including online activities, business trips, and business-related social events.

Our expectations also apply to interactions with third parties, such as vendors, customers, suppliers, and business partners. You should treat others respectfully, and you should expect to be treated respectfully.



Maintain a Safe Workplace

Everyone deserves to work in a safe, secure, and healthy environment. Together, we follow safety protocols — no exceptions, no shortcuts. We watch for hazards and report them so they can be addressed. We look out for each other.

We look out for each other.

- **Follow** all **safety policies** and regulations and wear appropriate **personal protective equipment**. Never engage in behavior that could put anyone at risk.
- **Report** any **unsafe** conditions immediately. This includes **accidents** and **near-misses**.
- Keep a **drug-free** and **alcohol-free** workplace. Where permitted by law, Keenova may test applicants or employees.
- **Don't perform** your job if you are **impaired** by alcohol, illegal drugs, or prescription medication. Don't possess or sell illegal drugs at work.
- Do not bring weapons to work. **Weapons are not permitted** on Company or customer property.
- **Never** make violent **threats** or act with physical **aggression**.
- **Report** any violent **threats** or warning signs **immediately**.

Certain Keenova business or social events may include alcohol that is served and to be consumed in moderation.

Make appropriate choices when taking part in these. Never engage in or enable underage drinking, excessive drinking, or driving while intoxicated.



Commitment to Equal Opportunity

Our global Company collaborates across time zones, cultures, countries, and business units, serving patients and healthcare professionals worldwide. Together, we bring a range of backgrounds, experiences, and perspectives to our work. We practice equal opportunity in hiring and employment.

- Welcome different **opinions, perspectives,** and **experiences,** recognizing these makes us a **better company.**
- Be **welcoming** and **respectful** in workplace interactions and conversations.
- If you are in a position to make decisions like hiring, pay, performance, discharge, promotion, or other decisions regarding the employment of others, those decisions must be based on **merit** and **achievement,** not because of any protected individual characteristic protected by applicable law.

Applicable law prohibits discrimination based on protected characteristics in the terms and conditions of employment, including:

- Age
- Race, color, or national origin
- Religion
- Marital status
- Disability
- Genetic information
- Military or veteran status
- Political activities or affiliation
- Sex or gender identity
- Sexual orientation
- Familial status



Observe Fair Labor Practices

We treat our workforce fairly, and we expect our suppliers to do the same. At Keenova, we will not accept child labor, forced labor, human trafficking, unsafe working environments, abusive disciplinary practices, or any behavior that does not promote human dignity and respect. Our requirements must be met, even in places where local laws permit actions that fall below our standards.

- Provide a **clean, safe working environment**, free of human rights violations. Take reasonable steps to ensure suppliers follow all applicable **labor and employment laws** as well as our requirements.
- **Never** use child labor or bonded, indentured, trafficked, or otherwise **exploitive labor**.
- Pay a **fair wage**, as reflected in local laws and standards. Respect **workers' rights** to **freedom** of association and **collective bargaining**.
- Support the sourcing of **conflict-free minerals**, including by complying with laws that require disclosure of their use.



Protect Personal Privacy

We live and work in an interconnected digital world, where it's possible to both collect and distribute large amounts of personal information/data in an instant. In response, many governments (globally) have passed privacy laws and regulations to protect personal data. Any time we work with personal information, also known as personal data, we have a legal and ethical responsibility to treat it properly and prevent it from being inappropriately disclosed or used.

- Only collect **personal data** when there is a **valid** business justification and lawful grounds for doing so, including when required by law or regulation or when you have obtained the **person's consent**. Collect only the minimum amount necessary.
- Be **transparent** and **upfront** when **collecting personal data**, including specifying why it's being collected and what it will be used for. Then **limit** the **use** of the personal data to that specific purpose or other compatible purposes.
- Access **personal data** only if you need it to do your job and are **authorized** to do so. **Securely store** and **transmit** sensitive personal data using **encryption tools**, in line with our information security policies and contractual obligations.
- Ensure that any **personal data** you collect and maintain is **accurate** and follow Company's retention practices at all times.
- Share **personal data** externally only with those **authorized** to receive it, if you are **approved** to do so, and if there are **protections** in place. Make sure business partners and other third parties understand their **obligation** to protect it.
- Be aware of **privacy risks** with the use of **AI tools** and systems and act responsibly.
- **Report** any **policy violations**, suspected **data breaches**, or **other risks** to personal information right away. See final section for contact information.

What is personal data?

"Personal data" means any information relating to a living individual who can be identified directly from that data or indirectly in conjunction with other information.

What is sensitive personal data?

Certain categories of your personal data are regarded as 'sensitive'. Sensitive personal data includes information relating to an individual's:

- Physical or mental health
- Religious, philosophical, or political beliefs
- Trade union membership
- Ethnic or racial origin
- Criminal convictions
- Biometric data used for the purpose of uniquely identifying a person
- Genetic data
- Sex life and/or sexual orientation

We maintain sensitive personal information only if it has a business purpose and is necessary for carrying out Company business.



Protect Company Information and Intellectual Property

Keenova information and assets power our ability to deliver on our purpose. We want you to have everything you need to inspire your work.

As an innovative business, we hold information that gives us an important competitive advantage — even things that may seem like common knowledge in your working group. We all need to take steps to protect our intellectual property and avoid accidentally sharing or disclosing what's confidential.

Remember: Once information is disclosed, you can't take it back.

- **Do not use publicly open AI applications**, including ChatGPT, for Company business in any manner that may share directly or indirectly the Company's **confidential** information.
- Learn to recognize **confidential** information. Make it a point to never discuss it with people outside of the Company unless authorized and with appropriate protection, such as entering into a Confidential Disclosure Agreement (CDA) with the third party, or legally mandated.
- Share confidential material only on a **"need to know"** basis, even with coworkers. Confirm they know it is **confidential** and are willing and able to **protect** it.
- **Clearly mark** documents containing confidential information as **"confidential."** **Avoid discussing** confidential information where you can be **overheard** and never leave it where others can see or access it.
- **Do not** post any confidential information on **social media, public forums, or unapproved external AI applications.**
- Know that anything you **improve** or **invent** as an employee **belongs** to the Company, including technical **innovations** and **enhancements, discoveries, or system designs.**
- **Safeguard** our **intellectual property**. Never share **research** or **nonpublic** or **competitively sensitive information** with a third party without prior approval.
- Show **respect** for the **intellectual property** of others. **Never misuse** it or **infringe** on their rights.



Confidential information

Confidential information is information or data of a sensitive nature that is not available to the public, that is disclosed by the Company to specific individuals for a designated purpose, and that could harm the Company or benefit our competitors if it is exposed.

This includes any information of a sensitive nature created by Company sources that may include:

- Proprietary business forecasts
- Marketing, financial, engineering, or acquisition plans
- Contract terms or intellectual property
- Restricted information such as scientific and technical knowledge and know-how

It also includes information concerning our customers, business partners, or affiliates as well as any external party information/data disclosed to the Company that has been designated as confidential and covered by a contractual confidentiality agreement between the Company and the other party.

Intellectual property

Intellectual property is intangible property, which can take the form of patents, copyrights, trademarks, and trade secrets. Intellectual property includes a wide range of things from our manufacturing processes, know-how, data and customer lists to our brand, Company name, and logos.

Trade secrets are a subset of confidential information. Trade secrets are a form of specifically identifiable confidential information that give the Company a competitive advantage and convey economic value because that information is not generally known or easily accessible by others. Confidential information may be disseminated more freely within the Company, while trade secrets are handled with more restricted access within the Company.

Our obligation to protect the Company's information does not end when we leave the Company.

Keep the Company's confidential information safe, do not share it with others outside the Company and do not take it with you if you leave the Company.



Safeguard Our Systems, Devices, and Networks

Cybersecurity is a serious risk for any company, and these threats are always evolving. Anyone may be targeted by cybercriminals who seek to gain access to our computers, devices, and electronic infrastructure. Because individual behavior can create dangerous entry points, we must take precautions and follow all information security policies and standards.

- Keep **laptops and mobile devices** physically and electronically secure.
- **Guard** your **passwords** and login **credentials**. Store them only in an encrypted password manager and don't share them with others.
- Follow our cybersecurity **policies** and **procedures**.
- Prevent viruses and downtime by installing only **authorized software**. Never connect unapproved devices to Company-issued computers.
- Know how to **recognize phishing** and **report it**. Think twice before providing information by email, text, or phone call, opening an attachment, or clicking on a link you were not expecting.
- Immediately **report** any **security issues** such as a sign of an **intrusion**, **data breach**, or **system vulnerability**.

Be alert!

Protect yourself! Verify the sender, hover over links before clicking, and be very skeptical about any demand for immediate action or personal information.

Business Use

Our computers, networks, and devices are provided for business use. While some personal use may be acceptable, it shouldn't be excessive or involve inappropriate or illegal activities. Don't use your personal computer or email accounts for Company business. It puts Company information at risk and could make your personal computer or email accounts subject to government or litigation-related disclosure.

Company Rights

If needed for business or legal purposes, the Company has the right to access or review the information stored on its systems, communicated using Company devices or computers, or sent across Company networks.




Create and Manage Records Appropriately

Our business generates large amounts of information including reports, presentations, emails, chats, voicemails, and calendar entries, and these bring ethical, legal, and business strategy considerations. Business records are the documents, data, or communications that we must retain and manage for a specified period of time due to a legal, regulatory, or business requirement.

- Be **accurate and truthful**. Your communications and documents should reflect the true state of affairs, without manipulation or intentional misrepresentation.
- Use only **approved Company channels** for business communications. Do not use unapproved channels, especially those that do not allow us to retain business records.
- Know how to **recognize a business record**. Handle each one according to the records retention schedule.
- **Cooperate** with any legal holds or other Company requests to **retain records** for longer than the time specified by the records retention schedule.

Business records aren't just formal reports or memos created by executive leadership.

Instead, they can exist in a wide variety of formats, from meeting notes to calendar entries to voicemails to chat threads to text messages.

 **Integrity. Every Decision. Every Moment. Every Outcome.**

Appropriate Communications

- Always write professionally, choosing the correct format for your message.

- **Don't suggest misconduct, even as a joke. Irony and sarcasm can be easily misunderstood.** Written records can be taken out of context and misinterpreted in the future and used against the author or the Company.
- **Avoid aggressive language or legal judgments when you are not a lawyer.** Don't say you plan to "crush the competition" (which could suggest anticompetitive behavior) or "they're cooking the books" (unless you have evidence of actual fraud).
- **Don't use work communications for private asides.** We often assume our communications are private, but they can become public — for instance, via a hacker or in a court case. Private statements made public can damage relationships or harm reputations.

Reread what you've written to make sure you're not unintentionally suggesting wrongdoing. Make sure any communications you create at work properly represent you and the Company.

A legal hold is implemented when we need to retain and preserve all records related to a particular matter. This might happen in the case of:

- Subpoena
- Litigation or threat of litigation, investigation or threat of investigation
- Demand or complaint letter by a party, attorney, or government agency

Destroying records under a legal hold order could be illegal and can lead to serious legal, financial, and reputational harm individually and to the Company.



Keep Accurate Books and Records

Our books and records must reflect our financial position and our business accurately. All Company records and reports matter. Even small amounts are part of a larger picture, and often others rely on our accuracy to get a true picture of our business.

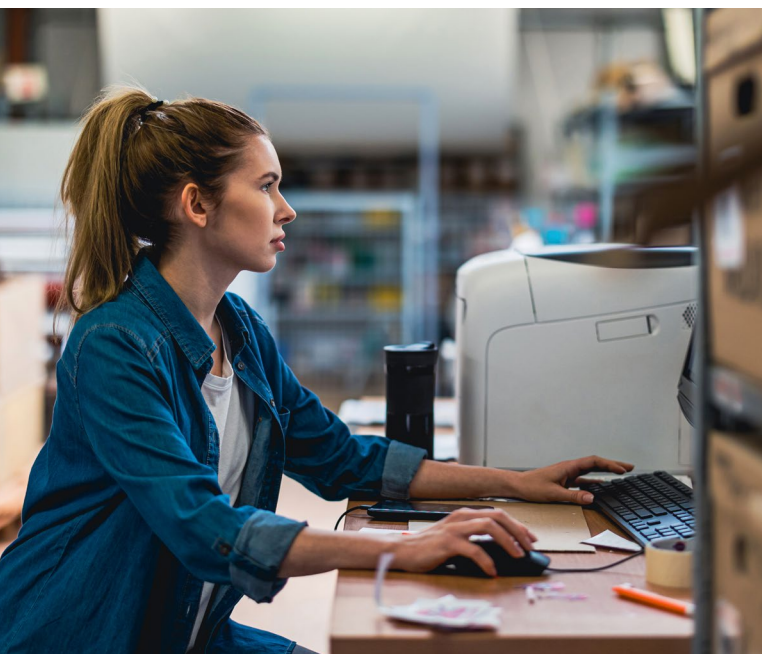
- Make sure business records are **timely, honest, accurate, and complete** and that our financial documents fairly represent all relevant information.
- **Follow** our internal **controls, processes, and accounting** standards. Never work around these or ask someone else to do so.
- **Never alter records** to conceal the true nature of a transaction.
- Watch for signs of **illegal activity** or **fraud**. If you believe funds are being misused or records are not accurate, **speak up**.

- **Cooperate** with any internal **audits** or **investigations**.
- **Preserve** any records relevant to a legal preservation notice issued.

Dishonesty has no place at Keenova.

Cheating, tricking, stealing, and lying hurt us all. Our Code and our sense of integrity prohibit:

- Fraud, such as submitting false documents
- Forgery
- Altering sign-in-sheets, expense documentation, or any other Company records
- Embezzlement
- Misappropriating assets
- Inflating sales numbers or reporting sales in the wrong period
- Recording expenses inaccurately
- Creating intentionally inaccurate entries in our financial records
- Intentionally disclosing inaccurate, false or misleading information or omitting disclosure regarding material matters
- Concealing, altering or destroying records relating to an imminent or ongoing investigation, lawsuit or inquiry



Do Not Trade on Inside Information

At work, we may learn information about our Company or another company that the public does not know. There are strict laws that govern how we use this kind of information. Insider trading happens when someone buys or sells a company's securities when they know material nonpublic information about that company that the market does not. Insider trading is both unfair and illegal, and it can result in serious fines and penalties.

- **Never** buy or sell **stock** or **securities** if you know material **nonpublic** information about that company.
- **Do not tip** anyone else **to buy, sell, or hold stock** or **securities** based on inside information about a company.
- For certain employee groups and **senior-level employees**, additional **requirements** apply, including reporting requirements and trading blackout periods.
- If you have any **questions** about a trade, consult the **Legal Department** before proceeding.

Information is "material" if it's likely that a shareholder would consider it important in making an investment decision.

Information is "nonpublic" if it has not been widely shared with the general public or if the public has not had time to absorb it.

Common examples of inside information include:

- Earnings estimates
- Plans to develop or acquire a new drug product
- Significant transactions
- Significant regulatory developments
- Clinical trial results
- Upcoming changes in the senior leadership team
- New strategic direction for the Company
- Unreleased information about legal settlements or judgments



Use Artificial Intelligence (AI) Responsibly and Ethically

As Keenova embraces the transformative potential of Artificial Intelligence (AI), we are committed to using it responsibly, ethically, and transparently. AI offers powerful opportunities to improve how we work, serve patients, and innovate with integrity.

Our commitment to ethical AI use means being transparent about its application, safeguarding personal and Keenova data, maintaining human oversight, and ensuring robust security.

What does the responsible and ethical use of AI mean?

- 1. Transparency:** Be transparent to our employees, customers, and stakeholders. Communicate when and how AI is being utilized in our products and services.
- 2. Privacy:** Prioritize the privacy of personal data. AI solutions must be in compliance with all relevant data protection laws and regulations.
- 3. Accountability:** Maintain accountability for AI systems. Human oversight is integral to AI processes to ensure they align with ethical standards and values, including recognizing and mitigating any inherent bias.
- 4. Security:** Implement robust security measures to protect AI systems from misuse and ensure they operate safely and securely.

By adhering to these principles, we aim to harness the power of AI to drive innovation while upholding our commitment to ethical conduct and social responsibility. Use only company-approved tools as directed and take steps to safeguard company materials and private information.



Safeguard Company Assets

We work together to safeguard our buildings, supplies, tools, and vehicles from theft or misuse. Keenova's assets are essential to our Company, our work, and our business. Protecting them means protecting our ability to serve our patients without interruption.

- Treat our physical **assets** with **care**.
- Use Company **assets** and **systems** primarily for **business purposes** and limit personal use so it should never interfere with your work.
- Store Company assets securely to **prevent misuse, tampering, and theft**.
- Let us know if any of our assets are **damaged, defective, or need repair**.
- Do not take Company assets when your employment with the Company ends.

Keep Personal Political Activities Separate from Work

We each have the right to engage in the political process and causes that are meaningful to us, in accordance with local laws, as well as the responsibility to keep our personal political activities separate from our work.

- Participate on your **own time**, using your own **resources**.
- **Never** use Keenova resources or funds to support **personal political causes, campaigns, or candidates**, unless authorized in writing by Government Affairs.
- **Do not** ask to be **reimbursed** for **personal** contributions to parties or individual candidates.
- **Never pressure** other employees to make political **contributions** or **support political parties** or **candidates**.
- **Never use** your Company **email address** or **letterhead** to communicate **personal political views**.

Keenova's involvement with the political process is managed by our Government Affairs Department. We also have a political action committee which certain U.S. employees are eligible to participate in voluntarily.

Do not engage in political actions or make contributions on the Company's behalf unless you've received approval from Government Affairs.



Communicate Accurately and Appropriately

As a Company, we want to speak with one voice. The things we say can have a powerful impact on our brand and reputation. We want to send a consistent message and make sure any information shared about the business is complete, clear, and accurate. That is why we authorize only certain people to speak publicly on our behalf.

Use only **approved marketing** and **advertising** materials, as well as any statements provided by Corporate Communications in response to sensitive issues. These materials undergo appropriate review so that we communicate promotional and company information in a **truthful, balanced, and accurate** way.

Make it clear that any expression of opinions are your own and not Keenova's.

- **Don't speak publicly** on behalf of the Company unless you have been **authorized** to do so.
- Refer all **media requests** to **Corporate Communications**. Do the same for any requests to **publish articles**, contribute to **blogs**, or participate in **speaking engagements**.
- **Never disclose** or **post** information that could **violate the privacy** of **our customers, patients, or employees**.
- **Don't speak publicly** about our **products** or disclose confidential information, either in person or online, **unless authorized** to do so by the Company.
- **Follow Company policy when using your personal social media** accounts to talk about the Company or our products. For example, reposting Company approved content is acceptable; inappropriate comments are not and reflect poorly on you and the Company.
- Use **good judgment** when responding to Company social media posts, and don't represent the Company's **point of view** on social media unless you have been authorized to do so.



Support Appropriate Charitable Activities

We are proud to support the communities where we live and work.

Keenova supports initiatives and organizations that are aligned with our focus on improving patient health and empowering the communities in which we operate. As a Company, our charitable support reflects our commitment to supporting organizations that have a direct impact on helping people affected by the Company's therapeutic areas of focus and the communities in which we live and work.

We must keep all charitable work entirely separate from our promotional work.

- All requests to **fund charitable donations** must be sent to and approved by authorized individuals identified in applicable Company policies.
- Contributions may **never** be offered as a **reward** or **incentive** for past, present, or future use of our products or in **exchange** for recommending our products. They can't be offered as a **price term** or in place of a **price concession** or **discount**.
- Charitable contributions will only be provided to **qualified charitable organizations** and made directly to that organization.



Promote Environmental Stewardship

Keenova prioritizes environmental sustainability through responsible operations and efficient resource management. We aim to protect natural resources and minimize environmental impacts from our operations, products, and services, while complying with all relevant laws and maintaining high internal standards.

By considering the environmental impact of your daily tasks and decision-making, you can help create a more sustainable workplace.



Whenever possible, try to:

Minimize Waste

- Reduce, reuse, and recycle where possible.

Conserve Resources

- Turn off equipment when not in use, limit water and energy usage.

Support Sustainable Practices

- Choose eco-friendly products, and promote energy efficiency

Get Involved

- Participate in Company-led sustainability initiatives and share ideas.

Comply with all applicable Company procedures and report any environmental incidents.

Support the Ethical Use and Treatment of Animals

At Keenova, we prioritize the appropriate and humane care of animals. We understand the importance of using scientific principles to ensure that pain and distress are minimized or prevented before, during, and after experimental procedures. We work only with appropriately licensed and qualified service providers who conduct animal research in compliance with industry and government standards, and we oversee their work to confirm they are adhering to these laws and principles.



Our Code Matters

**Integrity. Every Decision.
Every Moment. Every Outcome.
Takes All of Us.**

Our Code is more than a policy — it’s a shared commitment.

We are all personally accountable for following the directions in this Code.

If you need more information, guidance, or wish to ask a question about any matter covered in the Code, our Corporate Compliance team and other available

resources are here to help—please refer to the quick reference guide below in the Directory of Resources.

Our Commitment to Compliance

“Own every outcome” means we hold ourselves and each other accountable to act with integrity and do what’s right in every moment. We all need to understand and abide by the Company’s compliance commitments.

Speak Up if you have concerns, need training, or have an issue to report.

Directory of Resources

Topics/Functions	Who to Contact?
Report behavior not in line with our Code	The Ethics Hotline is managed by an external third party and is operated 24 hours a day. Ethics Hotline: 888-696-9864 International Hotline Number, see Ethics Website: keenova.ethicspoint.com keenovamobile.ethicspoint.com
Corporate Compliance, Cybersecurity, Human Resources, Investor Relations, Media Relations, Social Media, Legal	Contact information for each function can be found at: keenova.com/company/contact-locations/#contact
Medical Information, Adverse Event Reporting, Product Complaints	To report an adverse event or product complaint, find contact information at: keenova.com

Nothing in this Code of Conduct, including the confidentiality restrictions, or in any other Keenova policy or agreement between Keenova (or its affiliates) and any officer, director or employee should be construed to restrict or prohibit such individuals from providing information to any federal, state or local government agency responsible for the enforcement of laws or regulations applicable to Keenova, or reporting any possible violations of law or regulation to any federal, state or local government agency.



