

orexo

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**U.S. CODE OF BUSINESS CONDUCT AND ETHICS**

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## **INTRODUCTION**

Orexo wants to be recognized for the value it brings to patients and trusted for the manner in which we deliver benefit to society, patients and stakeholders. This Code is a critical document setting out the U.S. Code of Business Conduct and Ethics (the “Code”) for Orexo. Our daily decisions should always support these overall corporate objectives and reflect our respect for each other’s skills, viewpoints and decisions. We are energetic, proactive and innovative. The Code applies to all directors, officers, employees, contractors and temporary staff of Orexo (below referred to as “Employees”).

## **APPLICABILITY OF THE CODE**

Every Employee is required to attest to their understanding and comply with the Code, all applicable policies, standards and Standard Operating Procedures (SOPs) and all applicable laws and regulations in the countries where they do business.

Managers have the responsibility to provide support and guidance regarding the Code, relevant policies, processes and standard operating procedures (SOPs) as well as the laws and regulations in the countries in which they work or operate and to provide assurance on compliance therewith to the President.

Every Employee is expected to exercise good judgment and common sense in their doings to secure compliance with the Code, all applicable policies, processes and SOPs and must report any known, suspected or identified breaches thereof.

Failure to comply with the Code, relevant policies, processes and SOPs or the laws and regulations of the countries where we operate will be fully investigated and appropriate actions taken, like additional training, disciplinary action up to and including termination of employment.

## **REPORTING NON-COMPLIANCE OR QUESTIONS**

### **Seeking Help and Information**

This Code is not intended to be a comprehensive rulebook and cannot address every situation that you may face. If you feel uncomfortable about a situation or have any doubts about whether it is consistent with Orexo’s ethical standards, seek help.

We encourage you to contact your supervisor for help first. If your supervisor cannot answer your question or if you do not feel comfortable contacting your supervisor, contact the Compliance Officer. You may also seek help from or

submit information to Orexo by writing to Orexo at the email address "info@askarm.com" or report it to our hotline at +1-855-700-8355. You may elect to remain anonymous and will not be required to reveal your identity in your communication to Orexo.

### **Reporting Violations of the Code**

All Employees have a duty to report any known or suspected violation of this Code, including any violation of the laws, rules, regulations or policies that apply to Orexo. If you know of or suspect a violation of this Code, immediately report the conduct to your supervisor. Your supervisor will work with you to investigate your concern.

If you do not feel comfortable reporting the conduct to your supervisor or you do not get a satisfactory response, you may contact the Compliance Officer. You may also report known or suspected violations of the Code to Orexo at the email address "info@askarm.com" or call +1-855-700-8355.

Employees submitting this information need not leave their name or other personal information and reasonable efforts will be used to conduct the investigation that follows from the report from an employee in a manner that protects the confidentiality and anonymity of the Employee submitting the report.

All reports of known or suspected violations of the law or this Code will be handled sensitively and with discretion. Your supervisor and Orexo will protect your confidentiality to the extent possible, consistent with law and Orexo's need to investigate your concern.

It is Orexo policy that any Employee who violates this Code will be subject to appropriate discipline, which may include termination of employment. This determination will be based upon the facts and circumstances of each particular situation. An Employee accused of violating this Code will be given an opportunity to present his or her version of the events at issue prior to any determination of appropriate discipline.

Employees who violate the law or this Code may expose themselves to substantial civil damages, criminal fines and prison terms. Orexo may also face substantial fines and penalties and many incur damage to its reputation and standing in the community. Your conduct as a representative of Orexo, if it does not comply with the law or with this Code, can result in serious consequences for both you and Orexo.

## **Policy Against Retaliation**

Orexo prohibits retaliation against an Employee who, in good faith, seeks help or reports known or suspected violations. Any reprisal or retaliation against an Employee because the Employee, in good faith, sought help or filed a report will be subject to disciplinary action, including potential termination of employment.

## **RESEARCH & DEVELOPMENT**

Orexo is engaged in developing innovative solutions for new pharmaceutical products and will apply high ethical standards in all Research and Development activities globally complying with all applicable laws and regulations, including the declaration from Helsinki governing research and development performance, and international standards of good practices, such Good Laboratory Practices ("GLP") and Good Clinical Practices ("GCP").

Orexo is committed to protecting the patients and volunteers who take part in our clinical trials; ensuring we uphold the highest ethical, scientific and clinical standards in all of our research initiatives; and guaranteeing timely and transparent disclosure of study results. As such, it is critical that we act with the utmost regard for the health, safety and privacy of participants, while furthering the interests of science and society.

Employees will ensure that:

- Clinical trials are conducted in accordance with applicable laws, regulations and international standards of good practice.
- All data from clinical research is recorded, handled and stored in a way that enables accurate and transparent reporting, interpretation and verification.
- Individuals subjected to clinical research shall not be exposed to any unnecessary risks. It is our duty to ensure that they understand the nature and purpose of the clinical activity and informed consent is properly obtained.
- When collecting, using or disclosing a subject's Personally Identifiable Information (PII) or Protected Health Information (PHI), ensure that appropriate security safeguards are employed and data protection rules in host countries are respected.

Orexo is committed to transparency regarding the clinical trials we sponsor and recognizes there are important public health benefits in making clinical trial

information available to health care providers, patients, and the general public. Clinical research and the conduct of clinical trials in humans to evaluate the safety and efficacy of products for the diagnosis, treatment, and prevention of disease are critical components of medicinal product development. Employees will ensure the timely reporting of meaningful study results in an objective, accurate and complete manner. Employees will never attempt to influence inappropriately the results and conclusions of such research and will follow the applicable company guidelines, policies, processes and SOPs.

Employees shall accurately record any payments relating to the implementation and execution of a clinical trial.

## **PATIENT SAFETY AND BENEFITS**

Minimizing the risks and providing the benefits of our pharmaceutical products is the core of Orexo's commitment to the patients, from development through clinical research, manufacture, storage and distribution of our products.

Orexo, together with regulators, will develop proper prescribing information that will assist health care providers in making risk/benefit assessments in their prescribing capacity.

Products on the market will continue to be monitored for adverse events, new and unexpected safety signals and the regulatory agencies will be informed about these in accordance with applicable rules and regulations. Orexo will take necessary actions resulting from interactions with the regulatory agencies.

Every Employee is responsible for reporting any safety or performance issues relating to investigational drugs in clinical trials and our marketed products.

Employees may receive reports of adverse events from a variety of sources, including healthcare professionals (HCPs), patients, pharmacists, colleagues, social media and friends. Any Employee who learns about an adverse event or potential adverse event from any source must report it within 24 hours.

### **Adverse Events Reporting**

- When to report an adverse event. You are required to report all adverse events within 24 hours, regardless of:
  - Who tells you about the event (for example, an HCP, patient, colleague, friend, etc.)
  - How you found out about the event (word of mouth, e-mail, standard mail, phone, fax, etc.)

- Whether the event is listed in the package insert.
- Whether the event has been reported by another source.
- How to report an adverse event. Adverse events must be reported to Orexo's Call Center at: +1.888.982.7658 (1-888-ZUB-SOLV).
- Information required when reporting an event.
  - Your name and contact information;
  - The reporter's name, profession and contact information;
  - Name of the suspected product;
  - Patient identifying information (age, sex and initials only); and
  - A brief description of the event.

## **INFORMATION ABOUT OREXO'S PRODUCTS**

Orexo is committed to providing only truthful, nonmisleading and accurate information about the approved uses of our products and we never offer or promise anything of value to influence purchasing decisions. Patients and HCPs have a right to decide the best course of care, based on truthful, fair, substantiated and scientifically rigorous claims.

Employees shall:

- Only use promotional materials and other product information that have been approved through our internal review process.
- Always give an accurate, non-misleading, balanced presentation of our products attributes, including relevant safety information.
- Only promote products for uses that have been approved in a manner consistent with the country-specific approved labelling.
- Never promise or provide anything of value to reward or encourage the use, purchase or recommendation of our products.
- Comply with applicable laws, regulations and codes including the Food Drug and Cosmetic Act (FDCA), the Company's PhRMA Code Compliance Policy and the IFPMA Code of Pharmaceutical Marketing Practices.

## **INTERACTIONS WITH HCPs**

Orexo is committed to, in all interactions with HCPs and Organizations, apply the highest standards of integrity and honesty and full compliance with the Company's PhRMA Code Compliance Policy, IFPMA Code of Pharmaceutical Marketing Practices, and applicable laws, regulations and codes.

There must be legitimate needs for engaging services of HCPs or organizations and any payment for services must not exceed reasonable market rate for such service.

Employees shall not enter into any business arrangements or provide gifts, hospitality or anything else of value which may induce or reward positive decisions for our products or services.

Payments to HCPs or organizations must be based on a legitimate need for services and may only be provided if there is a written agreement governing the applicable services and payment.

## **GOVERNMENT INVESTIGATIONS OR REQUESTS**

Orexo operates in a heavily regulated industry. Governmental enforcement, regulatory agencies and competition authorities routinely conduct interviews and request information during audits, inquiries and investigations. Dealing honestly with these officials, and remaining courteous and professional at all times is critical.

Under all circumstances, Employees should:

- Immediately notify the President of any inquiries from government authorities, or if the President is not available, the next most senior person in the function related to the investigation or request.
- Cooperate fully and remain courteous and cooperative during audits, inquiries and investigations.
- Never make false or misleading statements, or ask someone else to make false or misleading statements.
- Make sure all documents and records are preserved and never alter or destroy any document that you believe is likely to be subject to an investigation or inquiry.

## **DEALING WITH SUPPLIERS AND VENDORS**

Orexo's suppliers play an important role in our ability to operate and provide important medicines to the patients we serve. That is why we must choose suppliers wisely, based on objective criteria, and with the expectation that our suppliers will act in a manner consistent with our own commitment to lawful, fair and ethical business practices.

Employees shall:

- Always select vendors and suppliers based on objective criteria, such as price, quality, service, reliability, and reputation.
- Treat all suppliers with fairness and respect.
- Take care to safeguard a vendor or supplier's confidential information, ensuring a confidentiality disclosure agreement is in place.
- Ensure that vendors and suppliers comply with all legal requirements and local laws, and act in a manner consistent with our commitment to ethics and compliance as outlined in this Code.
- Report all allegations of improper business practices, bribery and corruption relating to vendors and suppliers.
- Always choose vendors and suppliers based on merit, avoiding conflicts of interest, inappropriate gifts and entertainment. Never accept, directly or indirectly, any cash, credit, services, payments, loans, personal discounts or other favors from a vendor or supplier.

## **EMPLOYMENT STANDARDS**

Orexo is committed to a workplace that is free from discrimination or harassment of any kind. We value each individual's contributions and treat one another with dignity and respect, regardless of position, station or relationship.

Orexo does not tolerate any form of harassment and bases all employment-related decisions—recruitment, hiring, remuneration, promotion and development opportunities—solely on the job qualifications and merit of the individual without regard to race, religion, sexual orientation, age, gender identity or gender expression, national origin, citizenship, ancestry, marital status, disability, genetic information, veteran status, or other characteristics protected by applicable laws.



Employees shall:

- Never act in a way that harasses, degrades or discriminates against others. This includes unwelcome conduct, whether verbal, physical or visual, that is based on gender, race, color, religion or any other legally protected classification.
- Never behave in a violent or threatening manner.
- Never spread malicious rumors or create an intimidating, hostile or offensive work environment.

Orexo is committed to complying with all applicable employment laws and regulations as well as the principles laid out in the United Nations Declaration of Human Rights, the standards regarding child labour and minimum wages of the International Labour Organisation:

- it does not employ, engage, or otherwise use any child labor in circumstances such that the tasks performed by any such child labor could reasonably be foreseen to cause either physical or emotional impairment to the development of such child;
- it does not use forced labor in any form (prison, indentured, bonded or otherwise) and its Employees are not required to lodge papers or deposits on starting work;
- it pays each Employee at least the minimum wage, or a fair representation of the prevailing industry wage (whichever is the higher), and provides each Employee with all legally mandated benefits; and
- it is respectful of its Employees' right to join and form independent trade unions and freedom of association.

## **SAFETY, HEALTH AND ENVIRONMENT**

Orexo is committed to a safe and secure work environment where no one is subject to unnecessary risk. Orexo has adopted policies and procedures to facilitate workplace safety, but we will only succeed if there is a commitment from all of us to integrate safety and health considerations into everything we do. Employees are 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.

Employees should promptly report all environmental, health and safety issues, including unsafe conditions, accidents, near misses and work-related injuries; and promptly report all security issues, including threatening or violent behavior to your manager. Never assume that someone else will report a risk or concern.

Orexo is further committed to doing business in an environmentally responsible way, enhance and reduce the environmental impact of our work and our products and support waste reduction and energy-saving initiatives.

In addition to minimising the risks for exposure to chemical, biological and other hazards and proactively reduce the risk for accidents in the work place, Orexo supports programmes aimed at improving the health and wellbeing of the Employees.

## **BRIBERY AND CORRUPTION**

At Orexo, no Employee or third party acting on Orexo's behalf should ever make a payment or provide a benefit that is intended to improperly influence, or appears to influence, a business decision. This is particularly true in the case of public officials, government employees, HCPs and organizations, patients, suppliers, charities, and patient groups. Most countries in which we do business have laws that forbid offering, promising or authorizing any payment or item of value to a government official when the payment is made to obtain an unfair business advantage. In addition, a number of countries have laws that prohibit bribery even when it is committed outside their country's borders. Violations of anti-bribery and anti-corruption laws – including local laws and the U.S. Foreign Corrupt Practices Act (FCPA) are punishable by substantial fines and penalties, including imprisonment.

No Employee shall 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 or a third party.

All payments made to a government official or private individual must be reported and appropriately described in Orexo's expense reporting system.

## **PUBLIC POLICY AND POLITICAL ACTIVITIES**

### **Personal Political Activities**

Orexo supports the right to engage in personal political activities, as long as these activities remain private, are lawful and ethical, and are conducted on personal time with personal resources.

Employees shall never:

- act, or appear to act, as a representative of Orexo when engaging in personal political activities;
- use Orexo assets, including Company time, equipment or facilities, for personal political purposes;
- solicit contributions or distribute political materials during work hours; or
- pressure a colleague to participate in a political cause or make a political contribution.

### **Corporate Political Activities**

Orexo does not allow directly or indirectly any contributions or support to political parties, political organizations or individual politicians in its name. Orexo itself may choose to engage in corporate political activities. However, due to the complexity of the laws and regulations governing these activities, only Orexo employees who have received prior written approval from the President may engage in these activities.

Employees shall ensure that they have prior written approval from the President before:

- engaging in any public policy or political activity on behalf of Orexo;
- making any direct or indirect political contributions on behalf of Orexo; or
- engaging in lobbying activities on behalf of Orexo.

All interactions with government officials must comply with the “Bribery and Corruption” section above and with Orexo policies, processes and SOPs.

### **DATA PRIVACY**

In the course of doing business, Orexo collects and uses the personal information of a wide range of individuals; this information may include Personally Identifiable Information (PII) or Personal Health Information (PHI). Orexo is committed to complying with all Data Privacy laws and related regulations regarding collection, use, retention and disclosure of personal data gathered or entrusted to Orexo. These laws have a common purpose of protecting individuals from unauthorized use and disclosure of their personal information, and providing

individuals with transparency and choices regarding how their personal information is used.

Employees shall respect the sensitivity regarding gathered or entrusted personal data and will use all endeavours that the handling of such data is proper, transparent and secure so that the integrity of such data is not jeopardised and that such data is not inappropriately disclosed.

## **CONFLICT OF INTEREST**

A conflict of interest can occur when an Employee's private interest interferes, or appears to interfere, with the interests of the Orexo as a whole. You should avoid any private interest that influences your ability to act in the interests of the Orexo or that makes it difficult to perform your work objectively and effectively.

Identifying potential conflicts of interest may not always be clear-cut. The following situations are examples of conflicts of interest:

- Outside Employment. No Employee should be employed by, serve as a director of, or provide any services to a company that is a material customer, supplier or competitor of Orexo.
- Improper Personal Benefits. No Employee should obtain any material (as to him or her) personal benefits or favors because of his or her position with Orexo.
- Financial Interests. No Employee should have a significant financial interest (ownership or otherwise) in any company that is a material customer, supplier or competitor of Orexo.
- Service on Boards and Committees. No Employee should serve on a board of directors or trustees or on a committee of any entity (whether profit or not-for-profit) whose interests reasonably would be expected to conflict with those of Orexo.
  - Any such appointment must be approved in advance by the President.
  - Members of the Orexo executive management may not accept an appointment as a board member for an external company or organization without prior written approval of the CEO of Orexo AB.

Orexo requires that Employees disclose any situations that reasonably would 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 to your supervisor.

## **COMPANY PROPERTY**

Orexo physical assets, such as equipment, materials, supplies, money, and its intangible assets, like intellectual property, confidential information, value of our products and brand names, business relationships and Employees' time, skills and talent, may be used solely for the benefit of Orexo and its business, and not for personal or any inappropriate purpose.

Full-time employees of Orexo shall not engage in business activities outside Orexo which would negatively impact the attention and time required to fulfil their responsibilities at Orexo or may require that such activities have to be performed during regular working hours at Orexo.

Employees shall protect the Orexo's assets and ensure their efficient use for legitimate business purposes only. The use of Orexo funds or assets, whether or not for personal gain, for any unlawful or improper purpose is prohibited. Orexo equipment is intended for business purposes and not for personal use – other than incidental use that is reasonable and permitted by Orexo policies.

Employees shall:

- Exercise reasonable care to prevent theft, damage or misuse of Orexo property.
- Report the actual or suspected theft, damage or misuse of Orexo property to a supervisor.
- Use the Orexo's telephone system, other electronic communication services, written materials and other property, primarily for business-related purposes.
- Safeguard all electronic programs, data, communications and written materials from inadvertent access by others.
- Use Orexo property only for legitimate business purposes, as authorized in connection with your job responsibilities.
- Always protect Orexo's intellectual property (including trademarks, patents, copyrights and trade secrets) from unauthorized use and disclosure.

- Whenever spending Orexo's funds, make sure costs are reasonable, directly related to Orexo business, and properly documented.

Employees shall never:

- Use computers or other electronic devices to access, store or distribute content that is illegal, offensive, defamatory or obscene.
- Disseminate copyrighted or licensed materials without the permission of the copyright owner or other appropriate internal approvals.

Employees should be aware that Orexo property includes all data and communications transmitted or received to or by, or contained in, the Orexo's electronic or telephonic systems. Orexo property also includes all written communications. Employees and other users of this property should have no expectation of privacy with respect to these communications and data. To the extent permitted by law, the Orexo has the ability, and reserves the right, to monitor all electronic and telephonic communication. These communications may also be subject to disclosure to law enforcement or government officials.

## **FINANCIAL REPORTING, RECORDS & DISCLOSURES**

Maintaining complete, accurate and timely books and records is not only a legal requirement, it is also essential to the successful running of our company. Orexo complies with International Financial Reporting Standards and maintains books and records correctly reflecting the business activities and financial standings of Orexo.

Always accurately record sales, revenues, expenses, research findings, quality data, and other essential Company information. Never deliberately make a false, artificial or misleading entry in a report, record or expense claim. Never establish or maintain an undisclosed or unrecorded account, fund or asset.

Always comply with the policy and guidelines on the retention and destruction of records and documents, including legal hold orders relating to Company litigation, subpoenas or other legal processes. Never destroy or alter any document in anticipation of, or in response to, a request for those documents by any government agency, court, or third party that you reasonably suspect may initiate litigation against Orexo. Before you dispose of any document, make sure it is not subject to retention.

All communications and disclosures on behalf of Orexo must be fair, true, correct, timely and not misleading and may be made only by individuals properly authorized. If you are uncertain about the validity of any entry, data, record or

report (or if you are asked to create any false or misleading entry, data, record or report), you should immediately report it to your supervisor.

## **INSIDER TRADING**

Employees are prohibited from trading in the shares or other securities of Orexo while in possession of material, nonpublic information about Orexo. In addition, Employees are prohibited from recommending, “tipping” or suggesting that anyone else buy or sell shares or other securities of Orexo on the basis of material, nonpublic information. Employees who obtain material nonpublic information about another company in the course of their employment are prohibited from trading in the shares or securities of the other company while in possession of such information or “tipping” others to trade on the basis of such information. Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by the Orexo, up to and including termination of employment. This obligation applies even after employment with Orexo has ended.

Information is “non-public” if it has not been made generally available to the public by means of a press release or other means of widespread distribution. Information is “material” if a reasonable investor would consider it important in a decision to buy, hold or sell shares or other securities. As a rule of thumb, any information that would affect the value of shares or other securities should be considered material. Examples of information that is generally considered “material” include:

- financial results or forecasts, or any information that indicates a company's financial results may exceed or fall short of forecasts or expectations;
- important new products or services;
- pending or contemplated acquisitions or dispositions, including mergers, tender offers or joint venture proposals;
- possible management changes or changes of control;
- pending or contemplated public or private sales of debt or equity securities;
- acquisition or loss of a significant customer or contract;
- significant write-offs;

- initiation or settlement of significant litigation; and
- changes in the Orexo's auditors or a notification from its auditors that the Orexo may no longer rely on the auditor's report.

Information is “non-public” if it has not been made generally available to the public. Whenever there is any doubt whether information concerning a company is material or non-public, do not trade in the securities of such company.

Questionable trading by members of your immediate family or by members of your personal household can, additionally, be your responsibility and give rise to legal and Orexo-imposed sanctions.

The laws against insider trading are specific and complex. Any questions about information you may possess or about any dealings you have had in the Orexo's shares or other securities should be promptly brought to the attention of the Vice President, Finance.

## **CONFIDENTIAL INFORMATION**

Employees have access to a variety of confidential information while employed at Orexo. Confidential information includes all information that is internally generated by Orexo concerning the business of Orexo. It may also include information obtained from sources outside Orexo, including information about other companies or their securities. Confidential information includes all non-public information that might be of use to competitors, or, if disclosed, harmful to Orexo or its customers. Employees have a duty to safeguard all confidential information of Orexo or third parties with which Orexo conducts business, except when disclosure is authorized or legally mandated. An Employee's obligation to protect confidential information continues after her or she leaves Orexo. Unauthorized disclosure of confidential information could cause competitive harm to Orexo or its customers and could result in legal liability to you and Orexo.

## **MEDIA & PUBLIC COMMUNICATIONS**

Shareholders, investors, customers and the public count on us to provide accurate and reliable information about our operations, performance and outlook. In an age when information can be disseminated widely and instantaneously via the Internet and other media, it is important that our communications with external audiences are consistent and aligned with the policies and needs of Orexo. For this reason, it is important that only authorized persons communicate publicly on Orexo's behalf.



- Press Inquiries. All press and media inquiries should be referred, without comment, to the President. This includes, but is not limited to, media who call you directly or meet you at science events/meetings. No aspect of Orexo's business should be spoken about on or off the record.
- Investor Inquiries. All investor inquiries should be directed to the President. This includes questions at medical or science meetings or congresses. Only meet or speak with investment professionals with the President's knowledge. Never discuss Orexo's activities, prospects or performance either on or off the record.
- Social Media and Internet Forums. Employees should never discuss or post opinions about Orexo's products, strategies or other Employees on the Internet or on any other social media forum, including Facebook and Twitter.
- Speaking Engagements. Employees should never give, or participate in, any lecture or speaking engagement outside Orexo on any subject relating to Orexo's business without prior approval from your supervisor and following appropriate internal review and approval processes.
- Submitting Articles for Publication. Employees should never submit articles for publication that relate in any way to Orexo's business without first obtaining written approval from your supervisor and following appropriate internal review and approval processes.

## **COMPETITION AND ANTI-TRUST LAWS**

Orexo is committed to complying with all applicable anti-trust and competition laws. These laws prohibit agreements with competitors, suppliers and customers to "fix" prices or to otherwise restrain trade. Antitrust and competition laws are vigorously enforced and can result in enormous financial penalties, as well as possible imprisonment for individuals. We expect nothing less than strict adherence to the letter and spirit of antitrust and competition laws.

Orexo will not engage, directly or indirectly, in exchange of information or entering into formal agreements or understandings with competitors, customers, manufacturers or service providers that may be viewed as anti-competitive or unethical. Orexo will not engage in any activity involving bid-rigging or boycott.

- Do not engage in discussions or activities that could lead to the appearance of improper behavior. Among the subjects you should never discuss with competitors

- Orexo's prices, pricing policies, sales terms or inventory levels;
  - marketing plans or any other confidential matter;
  - customers or competitive activities with Employees or consultants of Orexo's; or
  - competitors or any other non-Orexo third parties, unless under an express Confidentiality Disclosure Agreement allowing such discussions.
- Do not propose or enter into agreements or understandings with competitors or suppliers that restrict the price or other terms in which customers can resell or lease a product or service.

## **TRADE CONTROLS**

In doing international business Orexo is committed to comply with laws, regulations, licensing requirements, boycotts, embargoes and other restrictions approved by recognised national and international authorities, including the United Nations, European Union, United States of America and Sweden.

Orexo will provide accurate and correct information about our products to Customs authorities and other relevant authorities.

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This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Orexo policy. We reserve the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.