



Sobi Code of Conduct

Our mission is to improve life for people with rare diseases.

Our mission is to improve life for people with rare diseases, by developing and delivering innovative therapies. To achieve this today and in the future, we act ethically and with integrity. That is why we follow our Code of Conduct.

Message from the CEO

The Sobi Code of Conduct provides a framework for what we consider to be responsible and appropriate conduct. It outlines what we expect of you as an employee and what our stakeholders can expect from us. It summarises our most important policies and principles and guides us in the Sobi way of working.

It is the responsibility of each one of us to read, understand and act in accordance with the Code. As a manager, it is your responsibility to implement the Code by acting as an ambassador and making sure it is a part of the way you, and your team, do business. It is everyone's responsibility to preserve the collaborative Sobi culture and support each other in making the correct decisions.

Throughout the company, we are all joined by our mission to provide treatments for patients with rare diseases. By safeguarding our strong culture of doing the right thing and living our values we will succeed in our mission for years to come.

Guido Oelkers
CEO and President
Stockholm, Sweden
September 2023



About Sobi's Code of Conduct

The Code applies to us all

The Code applies to all Sobi employees worldwide, as well as temporary personnel, consultants and others acting and/or working on our behalf. Every year, the Code is reviewed to ensure that the guidelines and rules are appropriate and remain relevant to our business and the world around us. The Board of Directors has approved this Code and will do so yearly.

Training is provided to all employees and temporary personnel and everyone at Sobi shall confirm on a yearly basis that they have read the Code and intend to comply with its principles. Managers are responsible for making the Code known in their teams, and for promoting and monitoring compliance with the Code.

Managing the social, ethical, environmental and human rights impacts in our supply chain is part of our value chain approach to embedding corporate responsibility throughout our business. We work with our partners to raise the level of understanding of sustainable business practices outlined in Sobi's Partner Code of Conduct.

Our values

Our Code of Conduct is aligned with our five values, which underpin everything we do:

- Care
- Ambition
- Urgency
- Ownership
- Partnership

Care – for patients, our colleagues and our company – is at the core of what we do. We demonstrate our ambition by challenging the status quo through innovation and curiosity. We act with **urgency** because the patients we serve cannot wait. We show **ownership** by making bold decisions and acting on them. We work in **partnership** to create the best opportunities for everyone. **Care** is at the centre of our other values, and all five values are equally important in everything we do, together, to achieve our goals.



Our sustainable company

Our mission is to develop and deliver innovative therapies and services to improve life for people with rare diseases. Enabling access to safe and effective treatments is our key contribution to sustainable development. We deliver on our mission through three initiatives:

- Commitment to patients
- Safety for patients and the environment
- Ethical and responsible behaviour

Sobi is a signatory to the UN Global Compact, a commitment of businesses across the globe to uphold universal principles in the areas of human rights, labour, the environment and anti-corruption. We conduct our business in a manner that is consistent with the International Bill of Human Rights, the International Labor Organization (ILO) Core Conventions, and the OECD Guidelines for Multinational Enterprises.



Making the right decisions

The Code covers many situations and gives you clear dos and don'ts where possible. However, there will be times when you will need to exercise judgement. Making the right decision is not always easy. If you find yourself in a situation where you are not sure what to do and you can't find the answer in the Code or other policies and guidelines, then ask yourself the following questions:

- Is it aligned with our values of care, ambition, urgency, ownership, and partnership?
- Is it consistent with our mission to support the rare disease community?
- Would you be proud to tell others what you decided to do?
- Is it legal and is it ethical?
- If it got into the news, would it support our reputation?

If your answer to any of these questions is no, then don't do it. If you are unsure or if there seems to be a conflict, then ask your manager for advice; or consult a member of our compliance, legal, or human resources team.

Unethical behaviour or actions could jeopardise our ability to deliver on our mission. Therefore, violations of our Code are not tolerated and may also ultimately lead to disciplinary action. Any disciplinary actions will be decided according to the nature and severity of the breach, and according to applicable laws and regulations.

Speaking up

Your responsibilities

We are all responsible for fulfilling the objectives of this Code of Conduct: not only by following the requirements ourselves, but also by preventing violations. As an employee of Sobi, you should speak up and report any concerns about anything you think may be unethical, or a potential violation of the Code.

WE

- Encourage and support employees to report any possible violation of the Code or law, or if any violation of company policy has occurred.
- Conduct a prompt investigation of any alleged violation and take appropriate corrective, remediation and/or disciplinary action.
- Prohibit any retaliatory action against any Sobi employee or external stakeholder for making a good-faith report of a suspected violation of the Code, any law, or any company policy, even if a subsequent investigation proves the report to be unfounded.

How to raise concerns

If you have concerns or questions about possible ethical misconduct, or suspect a possible violation of the Code, any law, or any company policy, contact:

- Your line manager
- HR manager or
- Compliance or legal department personnel

If you prefer to remain anonymous, you can use the Sobi Compliance Hotline available both on our intranet and external website.

Respecting each other

We respect all individuals and their human rights.

Our human rights statement

We always consider the impact of our activities and decisions on our people and on those around us. We strive to always conduct our business in a way that does not lead to any harm to people, whether caused directly or contributed to by us, or indirectly through our partners or activities to which we are linked.

We support and respect the protection of applicable national and internationally adopted human and labour rights. In our daily business and throughout our operations, we follow international declarations and conventions including:

- The UN Guiding Principles on Business and Human Rights
- The International Labor Organization's Declaration on Fundamental Principles and Rights at Work
- The United Nations Convention against Corruption

We support the Political Declaration on Universal Health Coverage (UHC) adopted by the UN member states and we recognise the special needs of the rare disease community as mentioned in the UHC declaration.



"It is the right of every human being, without distinction of any kind, to enjoy the highest attainable standard of physical and mental health."

– Political Declaration on Universal Health Coverage (UHC)

Safe and healthy workplace

At Sobi you can expect a safe and healthy workplace – a workplace that provides a sustainable environment for all of us. No one should be injured or harmed while at work. We continuously evaluate the risks of our operations to be able to take actions and prevent incidents.

Each one of us is responsible for contributing to a safe and healthy workplace. Safety and the working environment form a foundation of our leadership and managers are responsible for ensuring that employees and contractors are provided with regular training as well as any safety equipment they need.

What is expected of you

DO

- Take actions aimed at preventing accidents or illness.
- Report dangerous situations, accidents and incidents.
- Comply with laws, regulations, and company policies on health and safety.

In the event of an incident or an accident, we learn by analysing what went wrong, and put actions in place to make the workplace safe and healthy.

Open and respectful workplace

Diversity and equity are a foundation for our rare strength. Our aspiration is to help every employee reach his or her full potential. We do not tolerate discrimination.

What is expected of you

DO

- Respect the principles of diversity and equity and the personal dignity of your colleagues.
- Show trust and tolerance.
- Treat your colleagues as you would want them to treat you.

DO NOT

- Discriminate against people on the grounds of nationality, ethnicity, race, colour, faith, religion, gender, age, disability, political opinion, marital status, parental status, social origin, sexual orientation or any other legally protected status.
- Harass or abuse anyone or engage in any other behaviour that could create a hostile work environment.

What you can expect from the company

Fair working conditions

- **Fair pay** – Your salary, overtime and benefits will provide a living wage and will be at least at the level required by law, or by industry standards in areas where there is no applicable law.
- **Work-life balance** – We recognise the need for a healthy balance between work and free time. We will provide at least the minimum stipulated paid leave.
- **Fair performance evaluations** – We are firm believers in fair performance evaluations. Performance evaluations highlight development opportunities so that everyone can attain his or her full potential. How well you live by our values will be a factor in your performance evaluation.
- **Fair career development opportunities** – All employees at all levels should be offered the possibility to grow and develop in their role and enjoy equal opportunities in doing so.

Freedom of association and right to collective bargaining

We maintain a constructive relationship with our employees by communicating openly and honestly.

- You are free to form, join, or refrain from joining organisations that represent your interests as an employee.
- We respect your legal right to engage in collective bargaining.
- You will not be subjected to intimidation or harassment in your peaceful exercise of these rights.



“Collective bargaining” is a voluntary process by which employees may discuss and negotiate their employment conditions.

Protection of personal information

Our employees, patients, customers and partners, and all the other people we interact with, can rely on us to process personal information in a responsible and secure manner.

“Personal information” is information that can be used to identify a specific individual, for example name, birth date, address, or identification number. Many countries have laws to protect personal information.



What you can expect from the company

- We collect personal information only for legitimate business purposes and by lawful means and will not disclose or use it for purposes other than a legitimate business purpose or as required by law.
- We protect personal information by reasonable security safeguards against accidental loss or destruction or unauthorised access, use, modification or disclosure.
- We comply with all applicable laws and regulations regarding protection of personal information in countries where we do business.

What is expected of you

- Only collect personal information about any persons on behalf of the company, for legitimate business purposes, by lawful means and in compliance with our Policy on Processing of Personal Data.
- Only use or share personal information in a way that is consistent with the notice provided when the information was collected or with any consent obtained.

Zero tolerance of child or forced labour

We do not tolerate child labour in any form. We will not employ any person younger than the statutory minimum age for employment according to the UN Convention on the Rights for the Child.

We do not accept or apply forced, compulsory or involuntary labour in any form. For managers and staff, this means that we do not extract work or service from each other under the threat of any penalty, nor do we work against our own will or choice.

A photograph of two men in a light blue shirt and a grey shirt reaching up towards a basketball in the air. A basketball hoop and backboard are visible in the upper right corner. The background is a clear, light blue sky.

Respecting the patient community

We build relationships with the community with the patients' needs at front.

Staying in touch with the rare disease and specialist healthcare community is essential in improving the diagnosis and management of rare and severe diseases, and in securing the best quality of life for people who live with these conditions. The rare disease community encompasses healthcare professionals, patient organisations, families, and those affected by disease.

We are committed to complying with all applicable laws, regulations, and industry codes, including codes established by regional and local industry associations, in our interactions with healthcare stakeholders.

Interactions with patients and patient organisations

We interact with patients, caregivers and patient organisations based on integrity, transparency, trust and mutual respect and in full consistency with the applicable rules and regulations and Sobi policy.

We only work with organisations that are reputable, typically non-profit, and organised with the intent of being a representative body on behalf of a disease or condition.

What is expected of you

DO

- Be transparent about any interaction with a patient organisation.
- Respect the independence of patient organisations in the way they operate.
- Familiarise yourself with, and adhere to, Sobi's Policy on Healthcare Interactions.

DO NOT

- Ask to be the sole funder of an organisation, or of any of its programs.
- Ask any representative of a patient organisation to put the interests of Sobi above the interests of patients.
- Ask patients or patient organisations to promote any Sobi product or service.

Interactions with healthcare professionals

Healthcare professionals and organisations routinely work with companies in the healthcare industry to advance patient care and develop new medicine. All our healthcare interactions are intended to benefit patients or to enhance the practice of medicine. The community must be confident that their treatment choices have been based solely on the merits of each product and the needs of individual patients.

We are transparent about the work we do with healthcare professionals. We publish details of transfers of value in accordance with applicable laws and industry regulations.

What is expected of you

DO

- Remember that when we obtain services from healthcare professionals and organisations, it must be for a legitimate business need.
- Ensure that any activity with healthcare stakeholders is approved in accordance with Sobi's Policy on Healthcare Interactions and related processes before any commitments are made.
- Comply with all applicable laws, regulations and industry codes when interacting with healthcare stakeholders.

DO NOT

- Offer or appear to offer an incentive or reward to any healthcare stakeholder to give Sobi business or favourable treatment for our products.
- Pay more than an appropriate market value for the services rendered.
- Interfere with the independence of a healthcare professional's medical decisions.

Product safety and quality

The safety of patients is of highest priority to us and is demonstrated by our compliance with pharmaceutical quality standards and pharmacovigilance best practice. Through a proactive and continuous risk-based approach we ensure that the benefit is greater than the risks associated with our products. We will also take measures to prohibit any falsification of our products and support traceability.

What is expected of you

To ensure the safety and quality of our products, in our research, development, manufacture, storage, distribution or post-marketing activities, you must:

- Follow the pharmaceutical industry good practice guidelines (GxP).
- Comply with our policies on reporting safety information to ensure Sobi adheres to the set timelines for reporting safety information to regulatory authorities and partners. See the Product Safety Training for more information.
- Comply with all applicable laws and regulations.

Accuracy of product information

We promote a product for a specific use in a country only once regulatory approval for the product has been granted in that country and marketing is allowed.

What is expected of you

DO

- Ensure that any product information you issue is accurate, balanced, fair, and supported by scientific evidence.
- Ensure that any product information complies with the law, regulations and industry codes.

DO NOT

- Issue false or misleading product information.

Ethical research and development

High-quality and ethical science is of the highest importance to us.

Our research is founded on a scientific and medical need. The design of our studies and the studies we support shall enable a scientific sound evaluation. To avoid exposing participants to unnecessary risks, all studies are ethically and scientifically reviewed and approved, and conducted and reported in compliance with:

- The International Conference on Harmonisation (ICH) Guideline for Good Clinical Practice (GCP)
- The latest revision of the Ethical Principles for Medical Research Involving Human Subjects (the Declaration of Helsinki)
- All legal and regulatory requirements



When conducting clinical studies, we make sure that we give participants comprehensive, easy-to-understand information so that they will enrol only of their own free will and with informed consent. Patients also have the right to withdraw from a study without compromising the care they receive.

We are aware that working in the area of rare diseases may pose extraordinary requirements regarding paediatric and vulnerable patients and persons with genetic diseases. This can include special precautions in areas such as gaining consent, considerations for data privacy in small patient populations and research of genetic diseases. In addition, this group should stand to benefit from the knowledge, practices or interventions that result from the research.

We conduct our research openly. We register and report all our clinical studies and share the complete and accurate results of our clinical studies even if they show an outcome not beneficial for our business.

We understand that use of human biological samples in research and therapy development is a potentially sensitive area and all use shall comply with all relevant external legislation, regulations and guidelines.

Respecting society



We embrace social responsibility and are committed to promoting fair competition.

Anti-corruption

We act in accordance with all anti-bribery laws and will not engage in any form of bribery to secure business for ourselves or for any other company. We ensure that any relationships with government officials or healthcare stakeholders are legitimate. We also manage risks that those who act on our behalf, such as our partners and agents, do not engage in corrupt practices. See our Anti-Corruption Policy.

“Bribery” means offering (or requesting) an improper benefit with the intention of influencing or rewarding the behaviour of someone to retain a commercial advantage.

“Government officials” are individuals who:

- a. Hold a legislative, administrative or judicial position of any kind or
- b. Exercise a public function for a country or territory, or any public agency or public enterprise of that country or territory, or
- c. Act as an official or agent of a public organisation.

Healthcare professionals may be considered as government officials if they are employed by or act on behalf of government-owned healthcare institutions.

What is expected of you

DO

- Be aware that Sobi may be liable for the actions of third parties and ensure due diligence procedures are followed where needed to manage such risk.

DO NOT offer, give or receive a bribe in any form. This includes:

- Providing, offering, or promising any bribe (including money, goods, hospitality, gifts or any other item of value), directly or indirectly, to government officials and healthcare professionals and organisations.
- Making payment or providing benefits to private sector employees to influence them to obtain or retain a business advantage.
- Accepting or soliciting any illegal or inappropriate benefits (including money, goods, hospitality, gifts, or any other item of value) from suppliers, customers or others with whom we do business.

Fair competition

We compete fairly and do not engage in practices and conduct which may have a damaging effect on competition.



“Competition or antitrust laws” exist to maintain a competitive marketplace by regulating anti-competitive conduct by companies to ensure companies compete fairly. Competition law prohibits agreements, practices and conduct which have, or may have, a damaging effect on competition, such as collusion between competitors, or abuse of market power.

What is expected of you

DO

- Ensure you are familiar with the principles of competition law if your job involves contacts with customers, suppliers or competitors. See the Sobi Policy on Fair Competition.
- Stop the conversation if you are in a meeting where a competitor raises a topic that is sensitive from a competition law perspective.
- Seek advice from the Legal Department if you have any questions or concerns relating to competition law.

DO NOT

- Impose unlawful resale price restrictions on wholesalers, distributors, licensees, sales agencies, or any other party.
- Exchange information or agree with competitors on pricing, market allocation, business strategies, or any other competitive information.

Conflicts of interest

We ensure that our personal relationships and activities outside of work do not influence or appear to influence our decision making, judgement or conduct of Sobi’s business.

A “conflict of interest” occurs when personal, financial or other interests outside of the company may influence, or could be seen to influence, the professional duties and decisions of Sobi employees.

What is expected of you

- Always act in the best interest of the company and avoid any action or situation that may conflict with Sobi’s interests.
- If you find yourself in an actual or potential situation in which your personal interest potentially conflicts with the company’s – for example if a friend or family member is employed by a company with which Sobi is in negotiation – be open and transparent about the situation and consult your line manager or the HR or legal department before taking any action. See the Sobi Anti-Corruption Policy.

Trade compliance

We comply with all relevant laws and regulations when importing and exporting products, materials, machinery, technology and other items. Specific considerations and risk mapping are applied to sanctioned countries and restricted parties.

“Trade compliance” describes the terms and conditions for all trade between two or more countries and includes both customs-related matters (import and export) and export control (such as sanctions or dual use).

What is expected of you

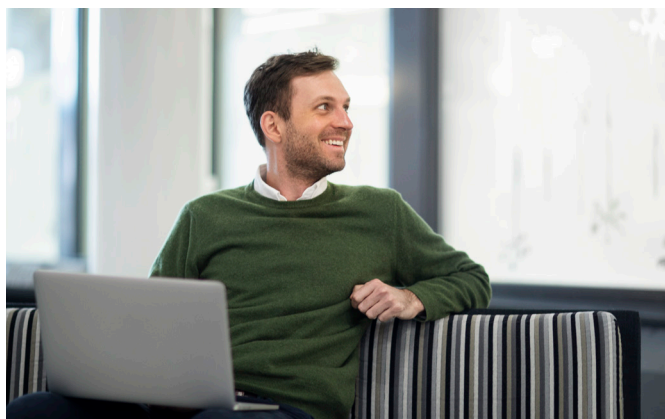
- If you are responsible for the export or import of goods or technologies, you should be familiar with these laws and regulations and the Sobi standards.

Communicating to our investors

We make timely and accurate disclosure of company information to investors. The investment community can expect us to comply with all applicable laws and regulations and company policies concerning financial disclosures including securities laws and regulations restricting insider trading of securities.

What is expected of you

- If your job involves public disclosures, you should be familiar with relevant laws and regulations and company policies. See the Sobi Communication Policy.
- If you become aware of “material non-public information” concerning Sobi, or any company transacting business with Sobi, you must not use that information for your or another person’s gain until it is publicly disclosed. See the Sobi Insider Policy.



“Material non-public information” is any non-public information that could have a material influence on investors’ decisions to sell or buy securities. Examples are issuance of shares, repurchase of shares, mergers and acquisitions, commercialisation of new products, progress or failure of clinical trials, and material changes in financial forecasts.

Interactions with political parties and public policy

Sobi is politically neutral. We do not make payments or donations of any kind to political parties or candidates, or their institutions, agencies or representatives.

We may engage in policy debates on subjects of legitimate concern to our business, our employees and the communities in which we operate. Raising awareness towards politicians is a legitimate activity carried out by selected authorised employees of Sobi.

What is expected of you

- If your job involves engaging in dialogue with governments and other public bodies to inform or influence public policy, you must do so in accordance with local laws, act transparently, and make it clear that you are acting on behalf of Sobi.

Environmental responsibility

Protecting the environment is a precondition of sustainable development. We take actions to assess, disclose and minimize the environmental impact of our activities and products over their lifecycle.

We actively work to protect land, water, air, natural resources, biodiversity and the climate by acting proactively, complying with the law and following expert recommendations. We encourage others within our sphere of influence to do likewise, and we collaborate closely with companies involved in our value chain.

Sobi is a signatory to the UN Global Compact, actively supporting the environmental principles in the way we conduct our business.



What is expected of you

- Take responsibility for environmental issues over which you have control and work according to the precautionary principle so that damage to the environment is prevented, and risks avoided.
- Familiarise yourself with, and adhere to, our Environmental Policy.
- Report any dangerous situations that could harm the environment or that deviate from our policy.



Respecting the company

We protect our assets, our information and our documents, and ensure correct accounting so not to risk our mission to support the rare disease community.

Protection of company assets

DO

- Protect Sobi's funds, property and other assets and use them solely for legitimate purposes in carrying out your duties to Sobi.
- Promote appropriate use of Sobi computer devices (computers, phones and other mobile devices) and IT systems according to the Sobi Global IT Policy.

DO NOT

- Claim or allow any fraudulent expense reimbursement.
- Use Sobi's computer equipment or IT systems unlawfully or inappropriately and for personal use, except incidental use permitted by company policy.
- Install unauthorised software, such as file-sharing software, that risks inadvertently disclosing information to third parties.

Company records, disclosures and securities transactions

Correct financial reporting enables Sobi to be a trusted player in the marketplace. All our business and financial records must be accurate, and financial transactions must be reported in a non-misleading manner.

DO

- Record all transactions accurately and properly in accordance with GAAP (generally accepted accounting principles).
- Maintain internal control systems to ensure that all transactions are accurately and properly recorded.
- Pay and report taxes in a responsible and transparent way.
- Comply with all applicable laws and regulations and company policies concerning corporate accounting.

DO NOT

- Make any false or artificial entries in the recording of transactions.

Confidential information and intellectual property

We protect all confidential information, including trade secrets and business or technical information about Sobi, our products and our partners.

Intellectual property such as patents, designs, copyrights, trademarks, know-how, data, and technical knowledge, developed or obtained by Sobi through research, development, or other activities are vital assets. We safeguard our intellectual property, and we cooperate in the establishment, maintenance and protection of our intellectual property rights.

Equally, third parties can expect us to respect and protect their confidential information and intellectual property rights.

What is expected of you

DO

- Use confidential information only for the performance of your duties to Sobi.
- Disclose such information only to those who need to know, both within Sobi and among third parties.
- Protect such information and keep it confidential, even after termination of your employment with Sobi.

DO NOT

- Obtain or try to obtain confidential information by illegal or unethical means, whether directly or through an agent.
- Improperly disclose such information to any third party.
- Ask Sobi employees to divulge confidential information concerning their former employers.