

**Renaissance SSA, LLC and Renaissance Lakewood, LLC(Here
after known as Renaissance)
CODE OF CONDUCT**

I. INTRODUCTION

This Code of Conduct ("Code") is designed to help all Company employees make the right choices when confronted with difficult situations. The intent is to remind each employee of his or her legal and ethical obligations, which are in many ways merely an expression of good judgment and common sense. The Code is our statement in which we intend to conduct our business activities.

It sets forth the standards of conduct that we require of our employees.

The continued success of Renaissance depends on preserving the goodwill of our employees, customers, suppliers, communities in which we do business. To protect this goodwill, each employee representing the Company must not only conduct all business dealings in compliance with the law, but with the highest level of integrity and ethics. It is the Company's intention to, at a minimum; abide by the Pharmaceutical Research and Manufacturers of America's Code on Interactions with Healthcare Professionals (PhRMA Code).

This Code is not an employment contract. It does not change the status of any of the at-will employees of our company. Compliance with its terms, however, is a condition of continued employment. Accordingly, each employee must acknowledge receipt of this Code, that it has been read and understood in its entirety and agree to be bound by its terms.

This Code does not try to anticipate every ethical dilemma you may encounter. We are relying on you to use common sense and good judgment. When faced with a difficult ethical decision, you may find it helpful to ask yourself certain basic questions such as:

- a. Am I compromising my own personal ethics in any way?
- b. Is there an ethical way to achieve the same result?
- c. How would I feel if my colleagues were taking the same action?
- d. Would I like to see my action become a general industry practice?
- e. How would I feel if my actions were to be made publicly known? e.g., reported in the newspaper
- f. Would the Company lose any customers if they knew that employees did this?

The Company reserves the right to modify this Code at our sole discretion. We will update these standards from time to time as we deem appropriate to reflect changes in the legal and regulatory framework applicable to us, the business practices within our industry, our own business practices, and the prevailing ethical standards of the community in which we operate. It is the responsibility of each individual employee of our Company to comply with this Code.

All references in this Code to "we," "us," "our," or "the Company" include Renaissance Lakewood, LLC (Renaissance).

II. CORPORATE ETHICS

Mere compliance with the law is not enough, nor can compliance be assured if you believe you are free to operate close to the edge of illegality. Such unethical behavior may result in termination of your employment with the Company.

Our core values include the requirement that all corporate actions be ethical, as well as humane. High ethical standards must guide us in areas where the letter of the law does not reach, and will make us more than merely a law-abiding company.

While ethical standards cannot be defined as precisely as legal requirements, each of you is expected to identify ethical issues as they arise, seek advice or assistance if necessary and act at all times in accordance with the ethical values inherent in the Code.

Many of the ethical issues briefly discussed herein are broad and complex. Conflicts of interest are a good example. No code of conduct can address all circumstances in which a conflict can arise between us and our employees or provide all the answers; however, if each of you reads and understands this Code and exercises good judgment, common sense and caution, the sum of all our actions will be nothing less than outstanding ethical performance by our company as a whole.

III. DISCLOSURE AND USE OF CONFIDENTIAL INFORMATION AND INSIDER TRADING

During the course of your work, you may have access to and become knowledgeable about sensitive information that is confidential, private, or proprietary to the Company or our customers and suppliers. Use of Company sensitive information (or confidential information received from third parties) is for company purposes only and disclosure of such information should be limited to those within the Company who have a need to know. Confidential information includes all non-public information that might be of use to competitors, or harmful to the Company or its customers, if disclosed. Company confidential information includes, without limitation, categories such as customer lists, contract terms, discount rates, or fees/prices offered to particular customers or suppliers, marketing and/or strategic plans, product formulas, FDA applications and

submissions trade secrets (including, without limitation, manufacturing and marketing processes and techniques), software, risk models, tools, systems and/or technology developments, and budgets and financial information. Safeguarding confidential information concerning the Company, employees, our present and prospective business, and our customers, suppliers, and investors is essential to the successful conduct of our business.

All information developed within the Company with respect to our business is confidential and proprietary and must not be disclosed or otherwise made available to any person who is not an employee. Necessary measures must be taken to protect such information and keep it safe. In situations where it is necessary to disclose such information as part of your job responsibilities, disclosure must be made with great care. If you are required by court of law or by any governmental body to disclose or otherwise make available such information and it is not part of your normal daily responsibilities, you must promptly notify Human Resources of this requirement so that we may exhaust our legal rights to maintain the confidentiality of such information or to limit further disclosure.

All external communications intended for the general public, the financial community, or the press regarding us or our business must be referred to and approved by the Chief Executive Officer, Chief Human Resources Officer or Vice President, Product Development and Regulatory Affairs.

Confidential information encompasses all information relating to: A) our business affairs and operation that is not otherwise available as public information and includes, but is not limited to, information or materials concerning (i) our vendors, suppliers, and customers, (ii) our budgets, business plans, and marketing plans, and (iii) proprietary products or processes and any other confidential or nonpublic information concerning copyrights, trademarks, trade names, service marks, inventions, patents and products; and B) all confidential information relating to a third party with whom we are under an obligation of confidentiality. Confidential Information shall only be shared with fellow Company employees or third parties who have a legitimate, need-to-know basis and are bound by a confidentiality agreement, or those to whom there is a legal obligation to disclose (for example, a regulatory agency). When in doubt, a Company employee shall contact the Vice President, Regulatory Affairs for assistance. No Company confidential Information shall be discussed in public.

This information may take a variety of forms, including, but not limited to:

- a. Confidential and proprietary business documents
- b. PC disks and/or external memory devices containing confidential and proprietary information
- c. Financial data
- d. Payroll documents and reports
- e. Employee data and files

- f. You must keep all papers that include or reflect confidential information at our principal place of business or at such other place or places as we may designate from time to time. You should maintain all such confidential information securely. Confidential information should not be left out in the open or otherwise made accessible to unauthorized persons and should not be carelessly discarded or discussed in public. (e.g., in an elevator where unauthorized persons may have access to it).

Under U.S. securities and other trading laws, you may not trade securities in a company based on inside information about that company or share that information with anyone else. Through your work, you may have access to material, nonpublic information about a customer, competitor, supplier, or other third party. This information is considered "inside" information. Trading securities of a customer, competitor, supplier or other third party while in possession of inside information is considered "insider trading" and is illegal. Inside information can include:

- a. Financial earnings or losses
- b. Potential significant business deals
- c. Budgets
- d. Changes in executive leadership
- e. Significant Transactions
- f. New products or projects

If you have access to inside information, never trade on it or share it with others until after it's been released to the public. Passing inside information along to anyone who may use it in a decision to invest, including family, friends, or third parties is also a form of insider trading known as "tipping". Exercise caution and avoid even the appearance of anything improper. If you have any questions regarding what is considered inside information, contact the Chief Human Resources Officer or Vice President, Product Development and Regulatory Affairs.

All Company technologies, devices, and systems are provided to employees to do their jobs (and the information they contain) belong to the Company and are intended to be used only for business purposes. This includes computers, phones, e-mail system, Internet connection, and any other electronic devices or related services. All of the usual standards of business conduct shall apply to these technologies, and, thus, shall not be used for any illegal, disruptive, offensive, or harmful purpose. The Company reserves the right to periodically inspect and/or monitor employee e-mail and Internet use. Users should have no expectation of personal privacy in their use of Company communication systems, including information sent or received by Company communications systems.

Upon the termination of your employment with us, you must deliver to us all documents, papers, records, files, recordings, digital and electronically stored information, computer software, and any and all other materials containing confidential information; and you may not retain any copies,

duplicates, summaries, or other descriptions of any of these materials.

You are bound by these obligations with respect to our confidential information not only during the period of your employment with our company, but also following the termination of your employment with the company.

IV. ADMINISTRATION

The Company expects you to comply with all provisions of this Code. You should seek the advice of your Supervisor, Human Resources or the Vice President, Product Development and Regulatory Affairs before you act on any ambiguous or unclear situation or for any additional guidance with respect to this Code.

You should assume that Renaissance's interest always requires strict adherence to this Code, and all applicable laws and regulations. Moreover, no Company employee has any authority to give any order or direction that would result in a violation of this Code or any applicable law or regulation.

You are required to report any violation of this Code or any law to your immediate Supervisor, Human Resources, the Anonymous Ethics Hotline or Vice President, Product Development and Regulatory Affairs. All reports will be directed to the Vice President, Product Development and Regulatory Affairs for appropriate investigation and resolution. Should a supervisor or other manager be informed of a violation or has a concern under this Code, he or she should report it immediately to the Vice President, Product Development and Regulatory Affairs. The Vice President, Product Development and Regulatory Affairs shall then inform the Compliance Committee of any reports made under this Code that require a discussion by the Committee.

We will treat the information in a confidential manner except as otherwise required by law, which may include our Vice President, Regulatory Affairs' obligation to conduct or direct an appropriate investigation of the matter, and we will seek to ensure that no acts of retribution or retaliation will be taken against anyone for making a report in good faith.

Failure to report a criminal activity can itself be understood to condone the crime; we emphasize the importance of reporting. Failure to report knowledge of wrongdoing may result in disciplinary action against those who fail to report.

The current version of this Code may be modified from time to time in our sole discretion. You will be notified when a new version of the Code is made available to you, and will be asked to acknowledge that you have read and understood it, and will abide by the current version of this Code.

V. STANDARDS

It is the Company's intention to comply with all laws applicable to the conduct of its business. Thus, you should not take any action, or fail to take any action, which you know, or should know, will cause us to violate any applicable law.

The sections that follow provide guidance with respect to certain areas of the law, which have particular importance to our business activities. It should be understood, however, that the special emphasis placed on these aspects of our business does not in any way limit the general requirement that you comply with all applicable laws and regulations.

It is the responsibility of each employee to take reasonable steps to ascertain, and cause the Company to comply with, any legal requirements applicable to a specific transaction which are more stringent than this Code. In the event of a question regarding the interpretation of any laws as they relate to our products, you should contact Vice President, Product Development and Regulatory Affairs or Chief Human Resources Officer.

We will comply with all laws, guidances and regulations applicable to our undertakings consistent with internal Company policies. We also expect all third parties that we work with to comply with all applicable laws and ethical business practices, environmental protection, data security, and other requirements related to labor, health, safety, and management, including but not limited to:

- Food Drug and Cosmetic Act (FDCA)
- Federal False Claims Act
- Office of Inspector General (OIG) Compliance Program Guidance for Pharmaceutical Manufacturers
- Pharmaceutical Research and Manufacturers of America (PhRMA) Code on Interactions with Healthcare Professionals
- Patient Protection and Affordable Care Act §6002
- All applicable state laws

a. Food and Drug Laws -

There are many laws that regulate the safety and quality of our products. In addition, these laws require that pharmaceutical products be effective for their intended uses. To achieve these objectives, these laws impose strict requirements on the manufacture, labeling, and sale of our Company's products. The Company strictly follows and complies with all laws regarding the manufacturing and vigilance on our products and employees are expected to follow company policies regarding these laws.

b. Competition Laws -

Competition and antitrust laws are intended to preserve competition by prohibiting actions that could unreasonably restrain the functioning of a free and competitive marketplace.

Agreements and actions commonly found to be clear legal violations include understanding between or among competitors to fix or control their prices; to boycott specified suppliers or customers; to allocate products, territories, or markets; or to limit the production or sale of their products or product lines. You should not enter into written or oral agreements, or engage in discussions of such matter with other parties. Any proposed contract or agreement with a competitor, on subjects other than those prohibited above, should be reviewed in advance with appropriate management.

c. Fairness in Employment -

Decisions as to hiring, promotion, and all other aspects of the employment relationship shall be based upon a person's qualifications and performance and company policy prohibits all forms of discrimination on grounds such as: gender; age; origin; religion; sexual orientation; physical appearance; health; disability; or trade union membership. In addition, all Company employees shall use care so that their acts and actions do not constitute any form of workplace harassment of any other employee or third party with whom they interface on the Company's behalf and prohibits any kind of conduct that may harm the personal dignity of another employee. Please reference the Prohibition of Harassment Policy for further information.

Employee information and records shall be maintained on a confidential basis and shall be used solely for appropriate purposes. Our employees shall comply with the employment laws of this country.

d. Safety and Health -

The Company is committed to maintaining a safe and healthful work environment. You should comply fully with all applicable safety and health laws and regulations and any Company specific instructions or policies regarding the health and safety of our employees. You should immediately report any condition, which you believe to be unsafe or unhealthy to your Supervisor.

e. Environmental Laws -

The Company is committed to a safe environment and sound environmental actions. You are expected to comply fully with all applicable environmental laws and regulations. In the event you have a question or concern with respect to the environmental status of any Company facility, you should contact your direct supervisor or if unavailable contact Human Resources. The Company asks that all employees and contractors make every effort to limit the number of documents they print out and make every effort to use the designated Company provided shredding boxes whenever possible.

f. Copyrights and Computer Software -

The unauthorized duplication of copyrighted materials, including copyrighted computer software, is a violation of copyright laws and Company policy.

g. Reporting to Government Agencies -

Any false, fictitious or fraudulent statement to any government agency or actions which facilitate a third party making false, fictitious, or fraudulent statement to the government should be avoided. In this regard, you should not take any action which would facilitate a customer's misrepresentation of the actual price it has paid for Company products for purpose of governmental reimbursement including, but not limited to, the issuance of invoices which do not fully disclose all applicable discounts and rebates.

Company policy is to assure that information it provides directly or indirectly to government agencies, is truthful, accurate, and not misleading.

h. Protecting Company Assets -

All Company assets should be used for legitimate business purposes. You must comply with our established technology and accounting policies and procedures at all times. You should fully and properly disclose the substance of all transactions to the individual who has the responsibility for accounting for a particular business transaction. The Company's technology and accounting personnel are expected to act with integrity to ensure that every transaction is properly recorded in the Company's books of accounting and records.

i. Conflicts of Interest -

You should avoid situations where your private interests conflict with the interests of the Company. You must promptly disclose any potential conflict of interest as they arise to your supervisor, Vice President, Product Development and Regulatory Affairs or Human Resources so that it may be resolved. The Company can typically take steps to resolve conflicts of interest, as long as it learns of them promptly. Having a conflict of interest is not necessarily a violation of this Code of Conduct but failing to disclose it always is. The appearance of a conflict is what a reasonable person might view as a potential conflict. A conflict may arise because of a person's own actions or through their family connections. It should also be disclosed whenever you are asked to certify your understanding and adherence to the standards in this Code. In particular:

- i. You and/or, in some cases, your immediate family members, should avoid any business or financial relationship with customers, suppliers or competitors that could influence or appear to influence you in carrying out your company responsibilities. This includes a) an ownership interest in these companies other than the nominal amount of stock in a public company and b) an interest in a transaction in which it is known that the Company may be interested.

1. We may remove any employee from any project or program, which a conflict of interest is reported.

- ii. You may not market products or services that compete with the Company, work for, or receive money from a competitor, customer, or supplier without approval from an appropriate member of management.
- iii. You should not take advantage of Company corporate opportunities for personal profit.

j. Political Contributions -

No contribution may be made, directly or indirectly, using the Company's funds, to political parties or candidate for public office, or in connection with ballot propositions to be voted upon. Contributions include not only money, but such things as Company products and the purchase of tickets to political fundraising events.

k. Extended Application of Certain US Law -

While, in general, it is Company policy to comply with the law of the country in which we are doing business, several U.S. laws apply to the actions of our employees.

- i. Relationships with Government Representatives:* Nothing of value, such as cash payments, gifts, favors or entertainment, should be given, paid, promised or offered, directly or indirectly, to any government official or other person acting on behalf of a government.
- ii. Boycotts:* The Company is prohibited under U.S. law from complying with requests for information or action furthering one country's boycott of another country which is friendly to the U.S. The Company must promptly report to the U.S. government any boycott-related requests for information or action. Such requests are sometimes included in a purchase order or letter of credit.

l. Relationships with Medical Professionals -

The laws of many cities, states and countries specify or restrict the Company's relationship with healthcare professionals including those dispensing or prescribing our products.

Regardless of the activity, the Company operates in compliance with all applicable rules and regulations with high moral and ethical standards.

The Company may interact with healthcare professionals. An employee may not give or accept gifts, provide entertainment or other items under any circumstances, regardless of whether the employee pays for the item. Meals may only be provided as a courtesy, with a modest meal values, and only as a side courtesy during product or scientific discussions. Some state laws ban any meals or gifts provided by a manufacturer to a healthcare professional. Business meals with healthcare professionals are limited to executive staff employees only and sales personnel and their direct managers are not permitted to provide or participate in a meal with a healthcare professional that is not part of an educational or informative session. Informational presentations with healthcare professionals provided by representatives or their managers must take place in an in-office or in-hospital setting only.

Including a healthcare professional's spouse or any other guest in a meal accompanying an informational presentation made by or on behalf of a company is not permitted. In addition, offering "take out" meals or meals to be eaten without a company representative being present is also not permitted.

m. Fee for Service Agreements -

The Company occasionally enters into agreements with healthcare professionals who provide services that are of value to the company and our patients.

For example, this may include gathering input on marketing strategies, participation on an advisory board, help determining the feasibility of a clinical development plan, or gaining their insights on presentations to be made to the FDA. In such cases, it may be appropriate for the Company to compensate the healthcare professionals for their time required to prepare for and participate in the meetings.

In doing so, we ensure that compensation is consistent with fair market value and the agreement between the parties is clearly documented and outlines the healthcare professional's responsibilities, the duration of the agreement, terms of compensation, and documentation of the completion of the engagement. The company verifies debarment with the FDA, prior to any engagement with a healthcare professional.

n. Fair Dealings -

It is Company policy to deal fairly with its customers, suppliers, competitors, and employees. You should not take unfair advantage of customers, suppliers, competitors, and employees through manipulation, concealment, abuse or privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

o. Anti-bribery and anti-kickback -

As part of our commitment to integrity, we do not tolerate any form of bribery. This means we will never offer, attempt to offer, or promise any bribe for the purpose of obtaining business, nor do we accept any bribes.

The Company is committed to unbiased competition and will not breach competition laws and regulations designed to promote free and fair competition in the marketplace. We will always compete fairly and in accordance with all applicable antitrust and fair competition laws. Thus, we never resort to improper or unethical payments to gain an advantage or advance our commercial interests and abide by the various anti-corruption laws in place in the countries where we do business, including, without limitation, The U.S. Foreign Corrupt Practices Act (FCPA), The UK Bribery Act, and The Corruption of Foreign Public Officials Act. At this Company, it is unacceptable to pay a bribe, kickback, or facilitation payment to anyone (whether a public official or in the private sector) to win business or any other competitive advantage.

p. Company support for Continuing Medical Education -

Continuing medical education (CME), also known as independent medical education (IME), helps physicians and other medical professionals to obtain information and insights that contribute to the improvement of patient care, and therefore, financial support from the Company may be appropriate. Accordingly, our Company provides any CME grant-making functions separately from our sales and marketing departments. Before any support is given to a CME provider, the provider must comply with the standards established by the Accreditation Council for Continuing Medical Education (ACCME) or other entity that may accredit the CME. We do not offer financial support for the expenses associated with non-faculty healthcare professionals attending CME, and do not and provide meals directly at CME events, except that a CME provider at its own discretion may apply the financial support provided to provide meals for all participants.

q. Company support/or third party scientific and educational conferences -

A conference or meeting is any activity, held at an appropriate location, where

- o The gathering is primarily dedicated, to promoting objective scientific and educational activities and discourse.

The main incentive for bringing attendees together is to further their knowledge on the topic(s) being presented. The Company does not provide financial support for the costs of travel, lodging, or other personal expenses of attending non-faculty healthcare professionals at these events and meetings.

r. Healthcare Professionals who are members of formulary committees

Healthcare professionals who are members of committees that set formularies of covered medicines or develop clinical practice guidelines that may influence the prescribing of medicines often have significant experience in their fields. That experience can be of great value to our Company and patients. To avoid even the appearance of impropriety, the Company requires any healthcare professional who is a member of a committee that sets formularies or develops clinical guidelines and also serves as under a contract with the Company to disclose to the committee the existence and nature of his or her relationship with the Company.

s. Scholarships and Educational Funds -

The Company may provide financial assistance for scholarships or other educational funds to permit healthcare professionals in training to attend educational conferences. The Company provides this support only if the selection of recipients is made by the academic or training institution.

- t. Document Retention -* All Company documents and records, whether paper or electronic, are subject to the Company's Record Retention Policy. When notified that documents in an employee's possession are relevant to an investigation, audit, or litigation, employees must

follow the guidelines set forth in the notification. For additional information, refer to the Company Record Retention Policy.

u. Prescriber Data -

At times, the Company may use prescriber data to facilitate the efficient flow of information to healthcare professionals. This data does not identify individual patients, is used responsibly so as to respect confidentiality, educate employees and agents about appropriate use of data, and maintains disciplinary policies for the misuse of this data. In addition, the Company abides by the wishes of any healthcare professional who asks that his or her prescriber data not be made available to Company representatives and abide by the rules of voluntary and regulatory programs that facilitate prescribers' ability to make this choice.

VI. EFFECTS OF FAILURE TO COMPLY WITH CODE

Conduct that violates this Code is expressly forbidden. It is important that you comply not only with the letter but, equally important, with the spirit of this Code. Any employee whose conduct violates this Code will be subject to disciplinary action, including, at our discretion, termination of employment and/or forfeiture of any benefits or rights that, under applicable law, are forfeitable upon a discharge for cause, and to the enforcement of such other remedies as we may have under applicable law.

The summaries of laws contained in this Code are brief and necessarily omit many subtleties and variations that exist in such laws, as well as other laws that may impose requirements upon us. In addition, laws which affect us may be supplemented, amended, or repealed from time to time. If you have any questions or uncertainty concerning the impact of applicable laws upon your company activities, you should request prior advice from the Vice President, Product Development and Regulatory Affairs, or Human Resources.

VII. REPORTING COMPLIANCE OR ETHICAL CONCERNS

The Company has established a designated email address and telephone hotline for employees or contractors with concerns, questions or complaints about the company compliance program or any potentially serious violations of the Code, our Compliance and Ethics Policy, or other company policies. Individuals can report their concerns or ask questions by calling the Compliance Hotline at 866-680-0004. The Company offers the option to remain anonymous when employees or contractors ask questions or report concerns via email or the hotline. Questions or concerns are vetted appropriately and escalated to the Vice President, Regulatory Affairs for investigation, as needed. In certain circumstances, it may be necessary for impartial third party investigations to be brought in to address and investigate certain concerns.

VIII. NON-RETALIATION

If an employee is aware of an actual or suspected violation of law or this code of conduct they are obligated to bring the violation to the Company's attention. They may do so without fear of retaliation, as it is our policy that no one may retaliate against an employee or a contract representative for reporting an ethical concern in good faith. Anyone discovered to be involved in any form of retaliation is subject to disciplinary action, up to and including termination of employment. Some examples of retaliation may include: demotion, denial of benefits, suspension, and harassment. If you believe that you have been retaliated against for an in-good-faith report or seeking advice, you should contact the Compliance Hotline.

IX. TRAINING OF COMPANY EMPLOYEES

The Company ensures that all of its representatives who are employed by or acting on behalf of the Company receive training about the applicable laws, regulations and industry codes of practice. In addition, the Company ensures our representatives have sufficient knowledge of general science and product-specific information to provide accurate, up-to-date information, consistent with FDA requirements. The Company provides updated or additional training in all of these areas as needed for their representatives who visit healthcare professionals.

X. CODE OF CONDUCT NOT A CONTRACT OF EMPLOYMENT

This Code is not a contract of employment nor is it meant to limit our rights to discipline or terminate employees for any acts of omissions, including those not set forth as part of this Code. This Code does not change the status of any at-will employee. We retain all rights in connection with the discipline and/or termination of employees. This Code is in addition to any employment contract that you may have with us.

XI. NAMES AND NUMBERS

Anonymous Ethics Hotline 866-680-0004

Brenda Vesey, Chief Human Resources Officer may be contacted at (732) 730-3293 or at brenda.vesey@renoharm.com.

Kimberly D. Ernst, VP, Product Development and Regulatory Affairs and Corporate Compliance Officer may be contacted at (732)691-5119 (cell), 732-730-3380 (Lakewood) or at kimberly.ernst@renpharm.com.

