



## **CODE OF CONDUCT**

### **I. INTRODUCTION**

**This Code of Conduct (“Code”) is designed to help all Renaissance employees and Third Party Partners (*as defined below*), make the right choices when confronted with difficult situations. The intent is to remind each employee and Third Party Partner of their 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.**

For the purposes of this Code, Third Party Partners includes, but is not limited to, suppliers, contractors, consultants, clients and/or customers and business partners. This Code sets forth the standards of conduct that we require of our employees and Third Party Partners. The continued success of Renaissance depends on preserving the goodwill of our employees and Third Party Partners, and communities in which we do business. To protect this goodwill, each employee and Third Party Partner 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, nor does it change the status of our relationships with any of our Third Party Partners. Compliance with its terms, however, is a condition of continued employment, as well as a condition of any and all prior, current, and future business relationships and agreements (*whether in writing or not*) with our Third Party Partners. Accordingly, each employee, as a condition precedent to continued employment and each Third Party Partner, as a condition precedent to continued compliance under any existing agreements and/or relationships, 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 a more 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 or Third Party Partners 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 and Third Party Partner 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 or termination of business relationships (*including any associated contracts*) with Third Party Partners, as applicable.

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.

All employees and Third Party Partners agree that they will abide by Renaissance's Code of Conduct, including acting in a professional manner. Unprofessional Behavior (as defined below) will not be tolerated. "Unprofessional Behavior" shall include behaviors that would be considered as rude or unethical, including, but not limited to, arriving excessively late to meetings with no advance notice,

attempting to access non-Third Party Partner confidential information while at Renaissance's facility, or verbally or physically abusing Renaissance employees or other Third Party Partners. Three (3) instances of Unprofessional Behavior shall constitute a material breach of this Code by the offending employee or Third Party Partner, and Renaissance shall have the right to immediately terminate any employment, business relationship or contract (*as applicable*) without penalty, and with all fees and expenses incurred on such offender's behalf, including materials purchased, due and payable to Renaissance.

Further, 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 and Third Party Partners, 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 Third Party Partners. Use of Company sensitive information (*or confidential information received from third parties*) is for Company purposes only and disclosure of such information must be limited to those within the Company who have a need to know. Confidential information includes, but is not limited to, all non-public information that might be of use to competitors, or harmful to the Company or its Third Party Partners, if disclosed. Company confidential information includes, but is not limited to, categories such as customer lists, contract terms, candidates interviewing for employment, discount rates, or fees/prices offered to particular customers or suppliers, marketing, business and/or strategic plans or proposals, product formulas, FDA applications and submissions, trade secrets (including, without limitation, manufacturing and marketing processes and techniques), software and computer programs, risk models, tools, systems and/or technology developments, know-how, concepts, techniques, processes, designs, books, agreements, business records and historical data, cost data and budgets and financial information and/or reports, pricing and cost information, industry or competitive information and processes (*including bidding processes*) and other know-how; or other information obtained from Renaissance or through observation or examination of any Renaissance information and/or facilities, together with any notes, reports, summaries, analyses, compilations, forecasts, studies, interpretations, memoranda or other materials captured and/or prepared based upon any observation or review of any Renaissance information and/or facilities. Safeguarding confidential information concerning the Company, employees, our present and prospective business, candidates interviewing for employment, our Third Party Partners, 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 a Company employee or person who is not otherwise bound by a fully executed confidentiality agreement or other formal obligations of confidentiality. 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, prior to disclosing any information, so that we may exhaust our legal rights to maintain the confidentiality of such information and/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 or VP Human Resources.

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 Third Party Partners, (ii) our budgets, business plans, and marketing plans, (iii) candidates interviewing for employment and (iv) 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, Human Resources for assistance. No Company confidential Information shall be discussed in public.

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

- i. confidential and proprietary business documents;
  - ii. PC disks and/or external memory devices containing confidential and proprietary information;
  - iii. financial data and reports;
  - iv. payroll documents and reports;
  - v. employee data and files; and
  - vi. and/or other electronic communications
- a. 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 must maintain all such confidential information securely.  
Confidential information

securely. Confidential information must not be left out in the open or otherwise made accessible to unauthorized persons and must 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 any Third Party Partners, competitors or other third party. This information is considered inside information. Trading securities of a Third Party Partner, competitor or other third party while in possession of inside information is considered insider trading and is illegal. Inside information can include, but is not limited to:

- 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 has 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 Vice President, Human Resources.

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 systems, internet connections, 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 must 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 must seek the advice of your supervisor or the Vice President, Human Resources before you act on any ambiguous or unclear situation or for any additional guidance with respect to this Code.

You must 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, or the Anonymous Ethics. All reports will be directed to Human Resources for appropriate investigation and resolution. Should a supervisor or other manager be informed of a violation or have a concern under this Code, they must report it immediately to the Vice President, Human Resources. The Vice President, Human Resources 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, Human Resources 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

The Company expects you to comply with all provisions of this Code. You must seek the advice of your supervisor or the Vice President, Human Resources before you act on any ambiguous or unclear situation or for any additional guidance with respect to this Code.

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 and Third Party Partner 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, Human Resources.

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 and Third Party Partners 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 must not enter into written or oral agreements, or engage in discussions of such matters with other parties. Any proposed contract or agreement with a competitor, on subjects other than those prohibited above, must 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 any and 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 and Third Party Partners shall use care so that their 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 or third party. 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 and Third Party Partners shall comply with the employment laws of this country.

#### d. Safety and Health

The Company is committed to maintaining a safe and healthy 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 and Third Party Partners. 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 must contact your direct supervisor or if unavailable contact Human Resources. The Company asks that all employees and Third Party Partners 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 are prohibited. In this regard, you are prohibited from taking any action which would facilitate any third party's misrepresentation of the actual price it has paid to Company for products or services for the 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 may only be used for legitimate business purposes. You must comply



with our established technology and accounting policies and procedures at all times. You must 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 or Human Resources so that it may be promptly addressed and 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. Any conflicts must also be disclosed whenever you are asked to certify your understanding and adherence to the standards in this Code. In particular:

- a. You and/or, in some cases, your immediate family members, should avoid any business or financial relationship with Third Party Partners 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.
  - i. We may remove any employee or Third Party Partner from any project or program, when a conflict of interest is reported.
- b. You may not market products or services that compete with the Company, work for, or receive money from a competitor, or Third Party Partner without approval from an appropriate member of management.
- c. You may 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 and Third Party Partners.

- a. **Relationships with Government Representatives:** Nothing of value, such as cash payments, gifts, favors or entertainment, may be given, paid, promised or offered, directly or indirectly, to any government official or other person acting on behalf of a government.
- b. **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 of action. Such requests are sometimes included in a purchase order or letter of credit.

#### I. 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 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 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 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.

For example, this may include gathering input on marketing strategies, participation on an advisory board, help in 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

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

#### 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 CMEs, and do not 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 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 their 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 their prescriber data not be made available to Company representatives and abides 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 or Third Party Partner who's conduct violates this Code will be subject to disciplinary action, including, at our discretion, termination of business relationship and any associated contracts, termination of employment and/or forfeiture of any benefits or rights that,

under contracts, 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 must request prior advice from Human Resources.

## VII. REPORTING COMPLIANCE OR ETHICAL CONCERNS

The Company has established a designated email address and telephone hotline for employees and Third Party Partners 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 Human Resources for investigation, as needed. In certain circumstances, it may be necessary for impartial third party investigators to be brought in to address and investigate certain concerns.

## VIII. NON-RETALIATION

If an employee or Third Party Partner 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 Third Party Partners 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 business relationship and any associated contracts, as well as employment, as applicable. 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 must 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.

## XL. NAMES AND NUMBERS

Compliance Hotline **(866) 680-0004**

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Anonymous Ethics Hotline **(866) 680-0004**

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The VP, Human Resources Officer may be contacted at **(732) 730-3293**