

ALK Third Party Code of Conduct

June 2022



Introduction

ALK provides products and solutions that help people with allergy. We wish to make a difference that matters – for people with allergy, for our partners and suppliers and for society in general – by living and working according to the principles outlined in this Code of Conduct.

We are committed to doing business in accordance with the UN Global Compact's 10 Principles and expect our partners and suppliers to do the same. All partners and suppliers can support this commitment by working according to the principles outlined in this Code of Conduct.

As global challenges grow in number and severity, we want to set a good example for others as we help people with allergy, and we want ALK to be associated with integrity and trust continuously.



Your role as an ALK Third Party

The purpose of this Code of Conduct is to outline the standards of behaviour that we expect from all ALK Third Parties, including suppliers, business partners, consultants and others working with or on behalf of ALK – irrespective of the country and territory in which they operate.

Scope

As an ALK Third Party, you are expected to work towards implementing the standards laid out in this Code of Conduct and should require the same from your own Third Parties.

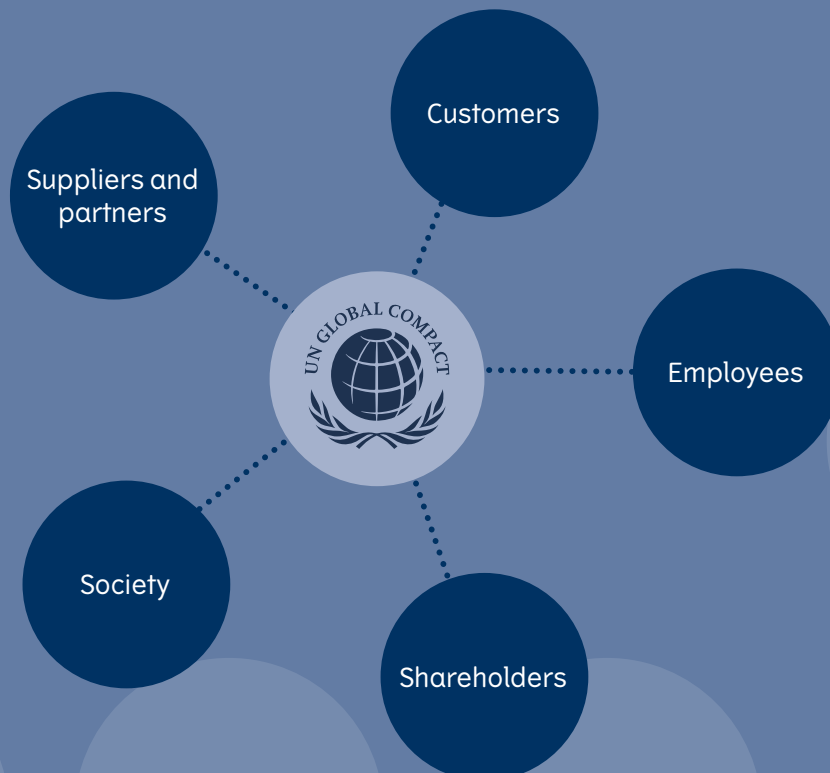
Any ALK Third Party shall ensure that all relevant employees are aware of the obligations described below and trained as needed.

Compliance

We expect an ALK Third Party to operate in compliance with applicable laws, regulations, standards and labour agreements, in addition to the standards contained herein. If local laws, regulations or standards are stricter than the principles and requirements laid out in this Code of Conduct, you must adhere to the stricter requirements.

We are aware that no Code of Conduct will cover all circumstances nor anticipate every situation, so the following should serve as a guide, and if you encounter situations not mentioned in this guide, or compliance with this Code of Conduct would violate local laws, regulations, standards or labour agreements, we expect you to apply the overall philosophy to the situation. Feel free to reach out to us for questions regarding specific concerns.

ALK expects ALK Third Parties to willingly share relevant books, records, facilities, etc. to ensure compliance with the above obligations. An ALK Third Party shall assist in good faith and make all appropriate personnel, procedures, books, records, etc. available to ALK auditors or others acting on ALK's behalf during any such audits upon reasonable prior notice.



We support the UN Global Compact's 10 principles in the areas of human and labour rights, the environment and anti-corruption and we have integrated these principles in the ALK Third Party Code of Conduct.

Animal welfare

Those ALK Third Parties that implement animal testing must ensure that animals are treated respectfully, with pain and stress minimised. Animal testing should be performed after consideration

to replace animals, reduce the number of animals used or refine procedures to minimise distress. Alternatives should be used whenever scientifically valid and acceptable to regulators.

Anti-corruption and fraud

ALK will not accept corruption, bribery or fraud in any form as a part of our business, whether conducted by an ALK employee, or on our behalf by a third party.

As an ALK Third Party, you are required to conduct business in a fair and legal manner and not engage in bribery in any form. This includes giving or receiving bribes as well as engaging in corrupt practices. ALK does not distinguish between public officials and private persons so far as bribery is

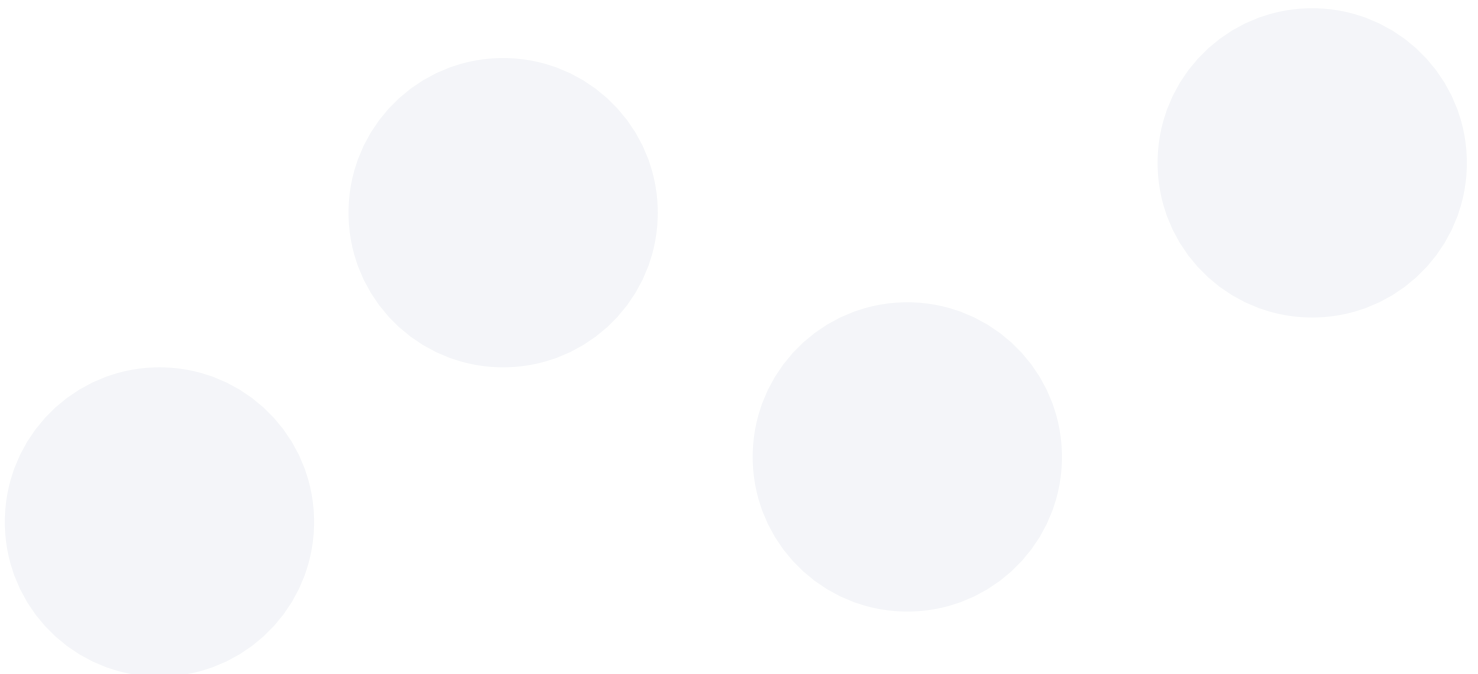
concerned. No intermediaries, such as agents, advisers, distributors or any other business partner, shall be used to commit acts of bribery. ALK prohibits any facilitation payments being made in the context of any ALK business.

Gifts or hospitality extended to ALK employees must be modest in scope, value, and frequency and reflect ordinary local business customs. Cash or equivalents, such as gift cards, can never be offered to ALK employees.

Anti-money laundering

ALK does not engage in or accept any involvement in money laundering. As our business partner, you must have proper internal control systems in place

to monitor your business for any indications of money laundering activities and thereby minimise the risk of being involved in any such practices.



Competition

All Third Parties working with or on behalf of ALK are required to comply with all applicable competition and antitrust laws, and they may not engage in

anticompetitive practices, such as price fixing and price sharing, market sharing, output-limitation, bid-rigging, etc.

Confidential information

Everyone at ALK is responsible for safeguarding confidential information.

Our confidential business information is very valuable and must be protected at all times, also from unintended or unauthorised disclosure internally. At ALK, we distinguish between confidential information and inside information. Confidential information in a business setting is information that cannot be shared with people who are unauthorised to receive it. Inside information is

information regarding a publicly traded company that can provide a financial advantage in the markets. It can be many different things such as new partnerships, changes in the financial outlook, clinical trial results, etc. Rules and regulations governing inside information are comprehensive and unauthorised access to or sharing of inside information is a criminal offence.

We expect all ALK Third Parties to:

1.

Safeguard confidential information related to their work with ALK and never share it with anyone who is not authorised to receive this information

2.

Never communicate externally about ALK's prospects or performance, nor disclose inside information without proper authority

Conflicts of interest

ALK employees must ensure that personal interests, activities and relationships do not create a conflict of interest and influence the employee's professional judgement when acting or making decisions on behalf of ALK.

We expect ALK Third Parties to be transparent in their business decisions and transactions to prevent any possible conflict of interest. We expect you to disclose to us if any ALK employee directly

involved in our business with you or a close relative of such an ALK employee has or potentially has a substantial economic interest in your business.



Environment

At ALK we strive to reduce our impact on the environment and climate through responsible consumption and production.

As a manufacturing company, we are both part of the problem and contributors to the solution which is why we strive for sustainable resource consumption and take measures to reduce the climate impact of our business processes.

As an ALK Third Party, we expect you to comply with applicable environmental legislation and strive to minimise your environmental impact. This includes identifying those areas that have the most significant environmental impact and continuously working to improve in those areas.

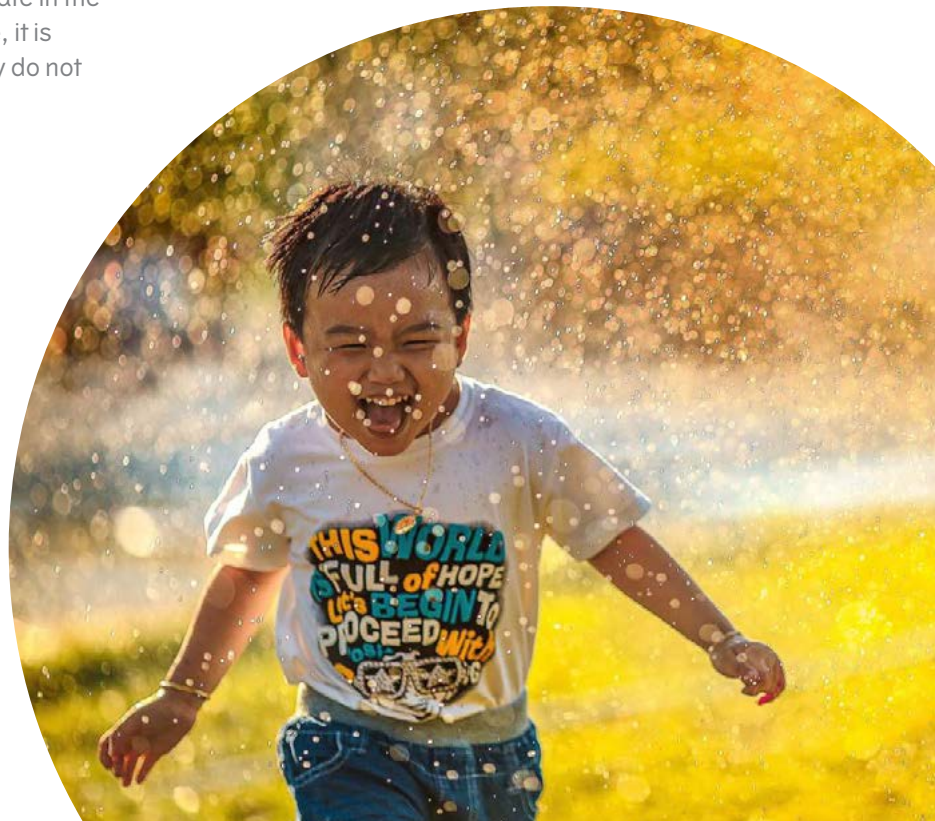
Grants, donations and political contributions

ALK only provides grants and donations to institutions and never to individuals directly.

ALK only makes donations to charitable events and for charitable purposes that are legal and ethical. Charitable donations are only given if ALK does not receive any tangible consideration in return.

ALK does not engage in any political activity, and therefore if employees choose to participate in the political process outside of the workplace, it is important that they make it clear that they do not speak on behalf of ALK.

We expect that ALK Third Parties do not provide political support, make charitable donations or offer sponsorships to gain an unfair advantage or with a view to influence decision making in connection with any transaction conducted in relation to ALK.





Health and safety

At ALK we are committed to safeguarding the health and safety of our employees.

ALK expects all ALK Third Parties to follow applicable health and safety rules and regulations, provide a safe and healthy work environment, and strive to promote an accident-free workplace.

Human rights

At ALK, we respect human rights, and we expect all ALK Third Parties to do so as well.

ALK Third Parties shall be committed to upholding workers' human rights and treating them with dignity and respect. ALK Third Parties are expected to meet the following labour rights principles and

foster compliance with them by their own suppliers unless otherwise required or prohibited by applicable laws.

We expect all ALK Third Parties to:

1.

Not employ, engage or otherwise use any child labour in circumstances such that the tasks performed by any such child labour could reasonably be foreseen to cause either physical or emotional impairment to the development of such child

2.

Not use forced labour in any form (prison, indentured, bonded or otherwise) and ensure that its employees are not required to lodge papers or deposits on starting work

3.

Not discriminate against any employee(s) on any ground (including race, religion, disability or gender)

4.

Not engage in or support the use of corporal punishment, mental, physical, sexual or verbal abuse and not to use cruel or abusive disciplinary practices in the workplace

5.

Pay each employee at least the minimum wage, or a fair representation of the prevailing industry wage (whichever is the higher) and provide each employee with all legally mandated benefits

6.

Comply with the laws on working hours, employment and rights in the countries in which it operates

7.

Be respectful of its employees' rights, as set forth in local laws, to join and form independent trade unions and freedom of association

Interaction with healthcare professionals and patient organisations

All ALK Third Parties must ensure that all interactions on behalf of ALK with healthcare professionals, healthcare organisations and patient organisations are for legitimate reasons and in accordance with applicable laws, regulations, codes and industry standards e.g. EFPIA Code of Practice, US Federal and State Transparency rules and regulations (collectively, “US Sunshine Act”).

All promotional, scientific or professional meetings, congresses, conferences, symposia and other similar events (including, but not limited to, advisory board meetings, visits to research or manufacturing facilities, investigator meetings for clinical trials and non-interventional studies) organised or sponsored by or on behalf of ALK are considered an event.

Any ALK Third Party interacting on behalf of ALK with any of the above mentioned shall:

- Be able to document the legitimate need for and professional purpose of any interaction.
- Ensure that a written contract is in place before the commencement of any collaboration or fee for service arrangement and that the compensation offered reflect the fair market value.
- Ensure that only appropriate locations and venues are selected or sponsored (hotel accommodation must be in hotels of maximum 4 star ratings, or as regulated by national medico-legal framework).
- Not provide any entertainment leisure or social activities at events and ensure that no spouses and other companions are invited. Only pay for travel, meals, accommodation and registration fees if inviting participants to events and keep all related costs reasonable, and only provide or offer meal (food and beverages) to a Healthcare Professional (HCP) when the value of such meal does not exceed one of the monetary thresholds defined by EFPIA and the respective national member association. If there is a discrepancy between different monetary thresholds, lowest value should generally be adhered to, unless otherwise described by national EFPIA member. If relevant, the value of the hospitality extended in connection with an event, must be disclosed according to EFPIA local member association disclosure code and national laws and regulations as well as for the USA, according to the US Sunshine Act.
- Gifts for the personal benefit (such as sporting or entertainment tickets, social courtesy gifts) to HCPs and Healthcare Organisation members (either directly or indirectly) are prohibited according to EFPIA gift ban. Providing or offering cash, cash equivalents or personal services is also prohibited. For these purposes, personal services are any type of service unrelated to the profession and that confer a personal benefit to the Recipient.
- Maintain systems and procedures to ensure all transfers of values to HCPs, Healthcare Organisations or Patient Organisations are recorded, reported or disclosed according to applicable regulations and standards. If applicable, written consent to disclose transfer of value should be obtained for interactions with an HCP, either on a case-to-case basis or for a given period of time, to cover all interactions during such time.

- All transfer of value to HCPs who have principal practice in another country than the one of the interactions (cross-border interaction), e.g. as consultants, including but not limited to faculty on scientific symposia, advisory boards and other consultancies must be in compliance with the code of the national EFPIA member association and/or national legislation of the organiser, of the country in which an event is held and of the country where the HCP has primary practice. EFPIA sets forth that disclosure of meal costs is not required as long as meal caps established by EFPIA are followed. However, requirement to

also disclose meal costs may be applicable as prescribed by national EFPIA member association and/or local medico-legal framework. It is the responsibility of the interaction initiator to be updated on relevant local medico-legal requirements for disclosure of transfer of value.



International sanctions and export control

ALK Third Parties must adhere to applicable national and international foreign trade control laws pertaining to business transactions with countries, companies and persons (sanctions), and the transfer of goods and services, software or technology between countries (export controls).

IT security

Technological advances have made information easy to access and hence more vulnerable to unauthorised access and manipulation. Any weakness in the approach to IT security can lead to breaches of personal privacy, the sharing of confidential corporate data, and violations of national and international laws.

We expect all ALK Third Parties to:

1.
Have adequate technical and organisational safeguards in place to protect all types of communication and / or data exchange with ALK

2.
Immediately report all cases involving the theft, loss, or unauthorised disclosure of ALK related information to ALK



Patient safety

All ALK Third Parties involved with handling or promoting drugs or drug substances shall maintain an effective pharmacovigilance system that meets applicable international and national laws, regulations, guidelines and industry standards.

Any Third Party shall promptly report any suspected adverse events associated with the use of ALK's products to drugsafety@alk.net.

All information is assessed by ALK pharmacovigilance in order to provide high quality and balanced information about the benefit-risk profile of ALK products.

ALK Third Parties will ensure that the rights of the people taking part in any clinical research conducted on behalf of ALK are protected, including through the informed consent process and procedures to protect patient privacy.

Personal data privacy

Handling personal data in an ethical and safe manner is highly important to ALK and to our stakeholders.

An ALK Third Party must protect the confidentiality and security of any personal and health data it accesses or generates while working with ALK in accordance with applicable laws and regulations (e.g. GDPR) and safeguard the data by ensuring implementation of appropriate measures.

Quality mindset

Quality is an integral part of all aspects of our business, and it is a prerequisite to providing allergy solutions for life to people with allergy.

Having a quality mindset supports our efforts with compliance – but more than that, it drives efficiency, ensuring that we do things right the first time, and that we drive continuous improvement in our work processes.

We expect all ALK Third Parties to:



Raising concerns

The ALK Alertline (found at <https://alk-abello.ethicspoint.com> or at www.alk.net) is available to ALK Third Parties to report serious and sensitive concerns relating to their business dealings with ALK.

In addition, ALK Third Parties are encouraged to implement safe internal reporting channels so that any concerns such as legal or ethical issues in the workplace, can be brought up and investigated in a diligent manner while providing the required whistleblower protection.



Possible actions post-audit or on the discovery of non-compliance

The ALK Third Party Code of Conduct is applicable and mandatory to all Third Parties working with or on behalf of ALK.

ALK may require that ALK Third Parties agree to the addition of reasonable legally binding clauses in the contractual documents between them to ensure the ALK Third Party follows the principles, and procedures where relevant, set out in the ALK Third Party Code of Conduct.

In the event that ALK becomes aware – either through an audit or otherwise – of serious or

multiple failures to comply with the ALK Third Party Code of Conduct, we expect the ALK Third Party to engage in a constructive dialogue on how to develop and implement an appropriate corrective action plan. In the event of continued, repeated or serious breaches of the code, we may decide to terminate our relationship or discontinue our relationship until we endorse that sufficient progress has been made to remedy the breaches.

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