



# Code of Conduct

2025



## TABLE OF CONTENTS

<b>Message from our CEO</b> .....	3
<b>Introduction</b> .....	4
<b>Our Purpose, Our Code, Our Shared Responsibility</b> .....	5
<b>Guiding Principles</b> .....	6
<b>Our Compliance Program</b> .....	7
<b>Reporting Compliance Concerns</b> .....	8
Speak Up.....	8
Cooperation.....	8
Confidentiality.....	8
Anti-Retaliation.....	8
<b>Ways to Speak Up</b> .....	9
<b>Legal &amp; Ethical Conduct</b> .....	9
Compliance with Laws.....	9
Anti-Corruption, Anti-Bribery & Anti-Kickback.....	10
Antitrust & Fair Competition.....	11
Confidential Information.....	12
<b>Quality &amp; Safety as Our Foundation</b> .....	12
Product Quality & Safety.....	12
Steps to Report Complaints, AEs, and PVs.....	12
Research & Development.....	13
Workplace Safety.....	13
<b>Honesty &amp; Integrity in All Actions and Statements</b> .....	14
Interactions with Patients and Patient Organizations.....	14
Interactions with Health Care Professionals.....	15
External Inquiries.....	16
Conflicts of Interest.....	16
Azurity Assets.....	18
Confidential information & Intellectual Property.....	18
<b>Dignity &amp; Respect in the Treatment of All Individuals</b> .....	20
Equal Opportunity.....	20
Harassment Free Workplace.....	20
Reporting Discrimination and Harassment.....	21
Privacy.....	21
Charitable Contributions & Sponsorships.....	22
<b>Accountability in the Way We Conduct Ourselves and Our Business</b> .....	23
Accurate Business Records.....	23
Records Retention.....	24
Use of Social Media.....	24
Political Activities.....	25

## Message from our CEO



Dear Colleagues,

In the pursuit of our business, we aim always to do the right thing—for our patients, for our communities, for the company and for each other. Our patients and stakeholders rely on us to act with integrity in everything we do. We hold one another to high ethical standards every day.

Our Code of Conduct serves as a framework and guide for us to act with integrity and connects our purpose and values with how we conduct our business. It is a tool that provides information and resources to guide us as we seek to behave in an ethical, thoughtful, and responsible manner and in compliance with the law. We all know that sometimes decisions aren't always clear and sometimes we are faced with situations where the right thing is not obvious. Though the Code cannot answer every question, it can be your guide to find out where to go when the answer is not clear.

Please familiarize yourself with our Code of Conduct and understand how it relates to our activities each day. Acting with integrity means asking the right questions, seeking help when you need it, and speaking up if you see anything that compromises our integrity.

Ronald Scarboro

## Introduction

This Code of Conduct (this “Code”), as may be amended from time-to-time, applies to all Azurity Pharmaceuticals, Inc. (“Azurity” or “Company”) colleagues, which includes employees, officers, and directors. All colleagues will be provided a copy of this Code and must certify that they have received, read and understand the Code and agree to comply with it. Leaders at Azurity are expected to set an example for others to follow.

It is also expected that Azurity's business partners (including independent contractors, suppliers, vendors, and other contractual partners) comply with the principles set forth in this Code, as well as all other applicable laws, rules, and regulations.

This Code is not a comprehensive manual and will not cover every situation you might encounter. It provides a foundation for colleagues and representatives regarding the legal and ethical requirements applicable to their roles at Azurity. This Code will be amended from time-to-time. The most current version of this Code can be obtained from the Human Resources, Compliance, or Legal Departments as well as Azurity's website ([www.azurity.com](http://www.azurity.com)) and Intranet (Azurity Connect). It is our obligation to be familiar with and adhere to the principles set forth in this Code, as relevant to our respective activities.



## Our Purpose, Our Code, Our Shared Responsibilities

### OUR PURPOSE

Azurity Pharmaceuticals is a pharmaceutical company focused on developing high quality products to serve the specific needs of overlooked patients.

### OUR CODE

Integrity is the foundation on which we build our company and compliance is woven into everything we do and how we conduct business.

Our Code of Conduct guides us in ensuring compliance and connects our purpose and values with our actions.

### OUR SHARED RESPONSIBILITY

Azurity colleagues must comply with this Code of Conduct. We must also ensure that third parties performing work on Azurity's behalf (such as consultants, contract workers, agencies, etc.) understand and adhere to this Code of Conduct, to the extent applicable, as well as any other applicable policies, procedures and laws.

We must hold each other accountable to this commitment. If you observe behavior that is not in line with Azurity's Code of Conduct, we encourage you to seek advice, raise your concerns, and speak up.

## Guiding Principles

Azurity strives to uphold the highest legal and ethical standards and principles of conduct in all we do — it is core to our continued success. All colleagues and business partners are responsible for conducting Azurity's business in a manner that demonstrates a commitment to high standards. This commitment cuts across functions, seniority, and titles – we are all responsible for upholding standards at all times.

If we suspect a violation of this Code and/or other policies and procedures, it is our duty to report such violations to the right parties so that prompt action can be taken.

As we pursue our purpose to Serve Overlooked Patients, we must do so following these guiding principles:

- Legal & Ethical Conduct
- Quality & Safety as our Foundation
- Honesty & Integrity in all Actions and Statements
- Dignity & Respect in the Treatment of all Individuals
- Accountability in the Way We Conduct Ourselves and Our Business

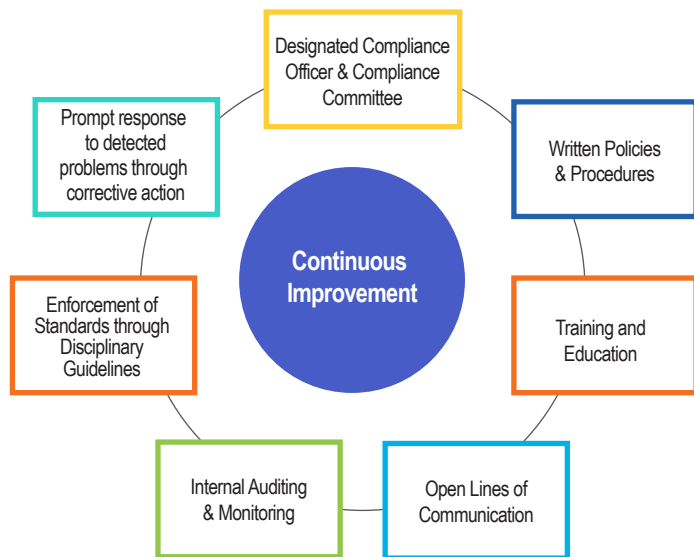


## Our Compliance Program

Our compliance program is designed to foster a culture of quality and compliance. It incorporates the seven elements of an effective compliance program as defined by the Office of the Inspector General for the U.S. Department of Health and Human Services: FR Notice - CPG for Pharmaceutical Manufacturers (hhs.gov)

### See More:

*PPG-301: Corporate Compliance Program*



Non-compliance with our Code can have serious consequences for Azurity, our colleagues, our investors, and for patients, customers, and the public.

## Reporting Compliance Concerns

### SPEAK UP

We promote a culture of open and honest communication. We are encouraged to ask questions and raise concerns. We have a duty to report anything that doesn't seem right.



### COOPERATION

All employees, directors, and officers are expected to cooperate fully in any investigation of alleged violation of this Code or other applicable rules, policies, or guidelines.

### CONFIDENTIALITY

It is essential that we feel secure to ask questions and report concerns. Confidentiality is a priority when concerns and compliance issues are raised. Every reasonable effort will be made to maintain the anonymity of colleagues who raise such concerns and to protect the confidentiality of their concerns. The Compliance Hotline allows for anonymous reporting of a concern, asking a question or seeking advice.

### ANTI-RETALIATION

Retaliation against any colleague who in good faith asks a question, raises a concern or reports misconduct is strictly prohibited. We have a protected right to report concerns in good faith without fear of harassment, retaliation, or any adverse employment consequences.

Nothing in this Code prohibits an employee from reporting any suspicion of violation of law to the appropriate governmental agency, or from participating in any governmental investigation or procedures.

Compliance support is available to you:

- Have a question?
- Need to raise a concern?
- Need to report a potential violation of our standards?

**Contact Compliance:**

Compliance@azurity.com

**Compliance Hotline:**

855-249-5706

<https://Azurity.ethicspoint.com>





## Ways to Speak Up

You are encouraged to discuss questions and concerns with:

### DEPARTMENT

#### Management

### CONTACT

- Your manager
- Any other manager
- Any executive, including VPs and Executive Leadership Team Members

#### Human Resources

- Your HR Business Partner
- Any HR Team Member
- Chief Human Resources Officer

#### Compliance Team

- Compliance Team Member
- Chief Compliance Officer
- Compliance@Azurity.com
- Anonymous Hotline
  - 855-249-5706
  - <https://Azurity.ethicspoint.com>

#### Legal Team

- Legal Team Member
- General Counsel
- Legal@Azurity.com

Many people are available to help; consult the person with whom you feel most comfortable.

---

#### See More:

**PPG-305: Reporting, Investigating, and Responding to Compliance Issues**

---

## Legal & Ethical Conduct

### COMPLIANCE WITH LAWS

Azurity is committed to abiding by all laws, rules, and regulations set forth to our industry, including but not limited to:

- Healthcare Fraud and Abuse
- Prescription Drug Laws
- Privacy Laws
- Competitive Practices

- Anti-Bribery and Anti-Corruption Laws
- Employment Policies
- Securities Laws and Insider Trading
- Marketing Laws and Transparency
- Transparency of Clinical Trial Data and Patient Safety

It is our duty to conduct our business activities in compliance with all applicable laws, rules, and regulations. To do so, we must educate ourselves regarding all applicable laws, rules, and regulations and ask questions when we are unsure.

### ANTI-CORRUPTION, ANTI-BRIBERY & ANTI-KICKBACK

Our industry is subject to many rules and regulations designed to eliminate fraud and improper influence. We compete with other companies, but we never seek to gain advantage through the use of bribes or kickbacks.

Colleagues and business partners must never offer, promise, authorize, or provide a payment or benefit that is intended to improperly influence a government official, healthcare professional, or any other person, in exercising their responsibilities. Such bribes or kickbacks are strictly forbidden. These can include money, gifts, commissions, credits, fees, gratuities, things of value or other forms of compensation that is provided, directly or indirectly, in an effort to improperly influence another individual to provide an undue advantage.

In our dealings, we take care to ensure that such dealings comply with all applicable laws, regulations, professional requirements or industry codes of conduct or practice. This requirement generally applies not just to direct interactions, but also to payments or promises made through third parties, including our business partners. Azurity colleagues may be considered responsible for the actions of the third parties they oversee; thus, they must take particular care to educate those partners on our expectations and ensure compliance.

#### WE MUST:

- Be certain that all transactions we enter into have a legitimate purpose
- Exercise great care when engaging with government employees or private individuals who have an ability to impact Azurity's business dealings
- Ensure any value provided for any transaction is fair and

appropriate and that such value is compliant with applicable law, rules, or regulations

- Raise any interactions that may potentially be seen as improper with applicable parties
- Document all transactions, including justifications for entering into such transactions, in sufficient detail
- Ensure that third party partners have a history of compliance and ensure they are operating in a compliant manner on Azurity business

## Antitrust & Fair Competition

Azurity ensures fair competition in all its business dealings and we expect our employees to comply with antitrust laws and competition laws everywhere we do business. These include, among other things, distribution agreements, rebates and discounts to customers, patent, copyright, and trademark licenses, territorial restrictions on resellers, and pricing policy generally.

Laws vary and are sometimes complex, so we consult with the Legal Team before interacting with competitors or engaging in business dealings which may be perceived to unfairly restrict trade. Some actions to avoid at all times include:

- Discussions (through any means, including orally or in writing) with existing or potential competitors about price; sharing of discounting policies or plans; division of territories; costs; sales; bids; markets or customers; or any other terms of sale;
- Discussions (whether oral or written) with suppliers or customers about actions that may exclude competition from the marketplace;
- Entering into any agreements or offering anything of value with the purpose or effect of preventing suppliers or customers from supplying or buying from competitors.



We also only collect and use business information about other companies in a manner that is ethical, lawful, and meets confidentiality obligations. This does not restrict the collection of competitive intelligence from publicly available source – however, colleagues must gather and use the information in a compliant, fair, and ethical manner.

## Confidential Information

We do not use material, non-public information to buy or sell the securities of Azurity, Azurity investors or lenders, or any other companies with which Azurity has or may be considering a relationship (including but not limited to vendors, suppliers, customers, research partners, or potential acquisition or collaboration targets), before this information is known publicly. We also do not give inside information to anyone else so that they can do so.

## Quality & Safety As Our Foundation

### PRODUCT QUALITY & SAFETY

The safety and quality of our products and the safety and well-being of patients are top priorities. We are dedicated to delivering products that meet or exceed the highest standards. We monitor and promptly report Product Complaints (PCs) and Adverse Events (AEs) that may be experienced during normal use of our products. It is our responsibility to report these events within 24 hours, even when there is minimal information.

#### See More:

*Azurity Medical Information*  
<https://azurity.com/medicalinformation/>  
*SOP MA-002: Handling Adverse Drug Experiences for Marketed Drugs*

### STEPS TO REPORT COMPLAINTS, AEs, & PVs

Collect as much information as possible. For AE, at least four elements are needed: patient identifier, reporter's contact information, Azurity product, and description of AE.

To report a **product complaint**, email:  
aereports@azurity.com  
or phone: 1-800-461-7449

To report **AEs**, email aereports@azurity.com  
or phone 1-800-461-7449.

To report **PVs**, email medical.information@azurity.com  
or call 1-800-461-7449

**Report  
immediately  
within 24  
hours**

## RESEARCH & DEVELOPMENT

We must ensure the safety and protect the rights of those who take part in our clinical trials and uphold the highest ethical, scientific, and medical standards in all our research and development activities.

We accomplish this by:

- Protecting the health, well-being, and safety of research participants.
- Conducting our research and development in compliance with all applicable laws and regulations and ethical guidelines, including good laboratory practices (GLP) and good clinical practices (GCP).
- Maintaining the integrity and quality of clinical data from our sponsored studies to ensure that our regulatory submissions are founded on data of the highest quality.

## WORKPLACE SAFETY

Azurity maintains safety and health practices consistent with the needs of our industry and in accordance with applicable law. Safety is EVERYONE'S responsibility. Each colleague and manager must practice safety awareness by thinking defensively, anticipating unsafe situations and reporting unsafe conditions immediately.

Each colleague is expected to obey safety rules and to exercise caution and common sense in work activities. Notify Management of any emergency or potential safety threat. Colleagues who are injured or become sick at work, no matter how slightly, must inform management immediately.



Employees who drive on behalf of the Company are expected to do so in compliance with local applicable law and otherwise operate their vehicles in a safe manner. This includes but is not limited to refraining from using phones or other electronic devices while driving.

**Violence and threats of violence are strictly prohibited and must be reported immediately.**

Employees who drive on behalf of the Company are expected to do so in compliance with local applicable law and otherwise operate their vehicles in a safe manner. This includes but is not limited to refraining from using phones or other electronic devices while driving.

Violence and threats of violence are strictly prohibited and must be reported immediately.

## Honesty & Integrity in All Actions & Statements

### INTERACTIONS WITH PATIENTS AND PATIENT ORGANIZATIONS

Serving the needs of overlooked patients is at the core of everything we do and interactions with patients and patient organizations give us the opportunity to understand how to improve our offerings and helps us develop products tailored to patient needs.

When we interact with patients and patient organizations, we must do so in an ethical, truthful, respectful manner that is at all times compliant with applicable laws, regulations, industry standards and codes. We must ensure we demonstrate appropriate respect for the patient-physician relationship, protect the privacy of any personal and health information that may be shared, and ensure discussions are in accordance with Azurity policies and applicable laws. Similarly, we must ensure that any information exchanged in our interactions with patient organizations is educational, accurate, and in accordance with Azurity policy and applicable laws.

All interactions with patient organizations are educational, accurate and consistent with Azurity policies including legal and regulatory standards

Given complex and rapidly evolving legal, regulatory, and industry requirements on interactions with patients and patient organizations, please contact the Legal and/or Compliance Departments for guidance.

---

#### See More:

*PPG-312: Interactions with Patient Organizations & Patients*

---



All individuals deserve access to quality healthcare and medicines prescribed by their physicians. To the extent patients or patient organizations inquire about co-pay savings, insurance support, or other additional assistance with access to Azurity products, please direct them to Azurity Solutions (<https://AzuritySolutions.com>).

**INTERACTIONS WITH HEALTH CARE PROFESSIONALS**

Health Care Professionals (HCPs) are key stakeholders to our business. When interacting with HCPs, it is important to always maintain the utmost integrity and transparency in every aspect of our relationships with HCPs.

Employees, consultants, and vendors must collect and report any direct or indirect transfers of value, including payments to HCPs or transfers of other forms of value, consistent with applicable laws and regulations. Azurity tracks and reports payments and other transfers of value provided to HCPs as required by applicable laws, rules and codes. Transfers of value include but are not limited to the value of food and beverages provided, consulting fees, speaker fees, travel and lodging, grants and payments of any kind. Our employees, consultants and vendors are expected to comply with the transparency and reporting requirements as well as Azurity's procedures on tracking and reporting relevant payments and benefits. Anyone with questions regarding these obligations must promptly seek guidance using one of the reporting lines described in this Code.

**See More:**

- PPG-303: Interactions with Healthcare Professionals*
- PPG-304: Business Courtesy Meals with Healthcare Professionals*



We respect the significant role that health care professionals play in patient care and will not unduly influence their healthcare decisions.



We promote our products based on patient need and in a balanced, transparent manner, founded in medical and scientific fact and ensure that it is accurate, timely, and not misleading.



We are committed to the highest standards of integrity and compliance with applicable laws and regulations in every aspect of our relationship with health care professionals.



We will not engage in illegal or unfair activities such as providing false or misleading advertising, offering bribes to influence decision making, or making unsubstantiated claims

**EXTERNAL INQUIRIES**

It is essential that our public communications are clear, truthful, consistent, and responsible. For this reason, only authorized persons may respond on behalf of Azurity to inquiries from the media, financial analysts, investors, government officials, and other members of the public.

Requests for information should be referred to a member of the Executive Leadership Team and the General Counsel. Notwithstanding the above, Azurity fully cooperates with applicable government authorities in connection with proper requests for information. Non-routine government requests for information should be referred to members of the Executive Leadership Team and the General Counsel.

**CONFLICTS OF INTEREST**

Colleague interests and actions should not interfere with their duties at Azurity or the best interests of Azurity. We remain committed to upholding our reputation of honesty and integrity and must avoid any actual or potential conflicts of interest.

A conflict of interest occurs when an individual's personal interests interfere with those of Azurity.

Even the appearance of a conflict of interest may harm your reputation and/or that of Azurity. Colleagues should avoid any situation where a reasonable person may question whether a business decision was inappropriately influenced by personal interest.

To avoid conflicts of interest, never accept payments or gifts as a condition to doing business, and do not conduct Azurity business with a family member or close friend, or have a personal material financial interest in a customer, supplier, or competitor.

All colleagues must conduct themselves in such a way as to avoid actual or potential conflicts of interest. The following are non-exhaustive examples of prohibited conflicts of interest:

- Acting as a director, officer, consultant, agent or colleague of a supplier, customer, competitor or any entity that engages in business with Azurity;
- Owning a material interest in or being a creditor of or having other financial interest in a supplier, customer, competitor or any entity that engages in business with Azurity;
- Violation of Azurity's Gifts & Entertainment Policy;
- Having any significant direct or indirect personal interest in a business transaction involving Azurity;
- Using or taking advantage of Azurity information, resources, or corporate opportunities for personal profit;
- Conducting outside activities that materially detract from or interfere with the full and timely performance of a colleague's job duties for Azurity;
- Influencing commercial transactions involving purchases, contracts or leases in a way that would have a negative impact on Azurity or its business.

Conflicts of interest may not always be clear-cut. Disclose any potential conflicts of interest in writing to your manager and to Human Resources as soon as you are aware of the conflict.

---

**See More:**

*PPG-102: Gifts & Entertainment Policy*

---

**AZURITY ASSETS**

The Company's assets, including facilities, materials, supplies, time, information, intellectual property, computer hardware and software, telephone and telecom services, email and other assets owned or leased by Azurity, or that are otherwise in Azurity's possession, may be used only for legitimate business purposes. Azurity prohibits personal use of its assets, other than incidental personal use, without company approval.

Examples of Company assets include, but are not limited to:

- Facilities
- Equipment
- Cash and other funds
- Computer hardware
- Computer software
- Telephones and telecom services
- Information systems
- Company provided mobile devices
- Information and records
- Intellectual property

**CONFIDENTIAL INFORMATION & INTELLECTUAL PROPERTY**

During the course of our work, we may produce or acquire information and ideas that are vital to our business and our ability to achieve our future goals. We have an obligation, as a condition of our employment at Azurity, to protect these important assets as confidential information and valuable intellectual property. The unauthorized release of these assets could adversely impact our Company and damage our relationships with customers and other stakeholders. All Company-related or Company-owned data and information – including those on our personal devices – are considered proprietary information and are the property of Azurity. These data and information are subject to inspection, review and/or collection by Azurity.

Examples of Confidential Information include, but are not limited to:

- Non-public sales and earnings figures
- Financial projections or strategic plans
- Technology, operations, research, and technical data
- Manufacturing techniques and processes
- Employee files, compensation data and other personal information
- Third-party information and records (e.g., patients, health care professionals, vendors, suppliers, etc.) given to us in confidence

We must safeguard Azurity's confidential and proprietary information. Our confidential information may not be provided to, or discussed with, anyone outside the Company unless the disclosure has been approved through the appropriate internal approval procedures or is required by legal mandate.

Except in certain limited circumstances specified by the Legal Department, a written nondisclosure agreement, in a form approved by the Legal Department, must be signed by the intended recipient of any Azurity confidential information.

The following principles should guide your actions in handling Azurity information:



Obtain nondisclosure agreements, in a form approved by the Legal Department, from third parties before they are granted access to any Company information.



Only approved Company signatories may sign agreements on behalf of the Company, including nondisclosure and confidentiality agreements. Please contact the Legal Department before implementing or signing one.



Take all necessary precautions to ensure Company information is not disclosed to outsiders accidentally.



When you have finished using the information, store the information safely or dispose of the information properly.



Any suspected or known unauthorized access to Company Information by non-Company actors must be reported immediately to your manager or the General Counsel.

## DIGNITY & RESPECT IN THE TREATMENT OF ALL INDIVIDUALS

### EQUAL OPPORTUNITY

Our Company is as diverse as the patients we serve, with each colleague contributing unique backgrounds, talents, perspectives and ideas. We celebrate this diversity as it encourages innovation and creates an environment where we can contribute freely and bring our whole selves to work every day. We base our work-related decisions on merit, experience, and personal aptitude. We must never discriminate on the basis of race, color, religion, sex (including lactation, childbirth, or related medical conditions), national or ethnic origin, ancestry, age, citizenship status, sexual orientation, gender identity or expression, veteran status, uniformed servicemember status, pregnancy, physical or mental disability, genetic information (including testing and characteristics), or other legally protected status. We expect our business partners to also act in a way that is consistent with our sense of fair treatment and equal opportunity.

### HARASSMENT FREE WORKPLACE

We operate at our best when we cooperate with others and perform our duties in a professional and collaborative environment where all colleagues are treated with dignity and respect. Behavior that is offensive, intimidating, discriminatory or harassing (including any form of sexual harassment) has no place in our Company. Harassment of any kind is never tolerated, regardless of whether it is in our offices, at off-site company functions, or on business trips. Your manager and Human Resources are there to support you to ensure you feel comfortable and safe.

The following should be true in all our dealings with each other and with those outside the Company:

- Treat everyone with fairness, respect, and dignity
- Do not discriminate when hiring or making employment related decisions
- Encourage and listen to those who voice their opinions and share their thoughts
- Be respectful of differences and embrace diversity
- Create a safe, constructive atmosphere, free from verbal and physical harassment

## REPORTING DISCRIMINATION AND HARASSMENT

### **Azurity will not tolerate discrimination or harassment of any kind against employees or third parties who perform work for the company.**

All employees are encouraged to speak out if they believe in good faith that an individual's conduct violates these rules and principles. To do so, they can make use of any of the reporting channels described in this Code. The Company takes all such reports seriously and reviews them promptly.

### **Retaliation of any kind against any individuals who raise a good faith claim of discrimination or harassment is strictly prohibited.**

## PRIVACY

The collection and use of personal information may occur during our business activities. Personal information includes data that can be used to identify, directly or indirectly an individual, such as name, contact information, and health-related information.

Personal information we collect and manage may include information concerning our employees; patients who have been prescribed our products; healthcare professionals; and those with whom we conduct business. Additionally, we may collect personal information for our research activities, pharmacovigilance, certain customer support services, marketing, sales and other business related activities.

We comply with all data protection and privacy laws applicable to wherever Azurity does business and handle any collected personal information with the appropriate level of care and responsibility. Please refer to Azurity's Privacy Policy or contact Legal with any questions or concerns about our Azurity's data privacy and protection procedures.

"Personal information" is any information related to an identified or identifiable natural person. Personal information can be used to identify, directly or indirectly a natural person, such as name, contact information, and health-related information.

Azurity colleagues and business partners must:

- Comply with applicable laws and regulations overseeing the use and protection of personal information
- Collect and use the minimum amount of personal information necessary for a legitimate purpose
- Keep personal information only as long as necessary and dispose of it properly
- Share personal information only with individuals who have a legitimate need for it

If you must share personal information to third parties to meet business needs, you must ensure third parties, including business partners, who have access to personal information provided by Azurity have a need to know such information, use personal information only to provide services to Azurity, and have safety standards necessary to protect the personal information. In some jurisdictions, other requirements may apply. Seek guidance from Legal before providing any personal data to third parties. Azurity colleagues must report any incidents of improper or accidental disclosure or use of personal or personal health information immediately to [legal@azurity.com](mailto:legal@azurity.com).

## CHARITABLE CONTRIBUTIONS & SPONSORSHIPS

Azurity strives to make a positive impact on patients and the communities in which they live. We aim to support worthy groups and causes including various non-profit institutions and eligible advocacy organizations that are related to the therapeutic areas we operate in. We periodically sponsor third-party organizations for the opportunity to promote our products, brands, or corporate interests in accordance with our policies and applicable laws.

---

### **See More:**

*PPG-307: Charitable Contributions*  
*PPG-308: Sponsorships and Exhibits*

---

## Accountability in the Way We Conduct Ourselves and Our Business

### ACCURATE BUSINESS RECORDS

Accurate books and records are fundamental for the management of the Company and compliance with applicable legal and regulatory obligations. All colleagues are responsible to ensure that Company documents are maintained honestly and fairly – with no regard to the medium (physical, electronic, etc) in which it is maintained. Our books, records, and accounts must accurately and fairly reflect all of the Company's dealings and transactions with the appropriate level of detail. Financial statements must conform to generally accepted accounting rules and the Company's own accounting policies. All employees must follow document retention policies and practices.

#### How to Treat Business Documents:

- Record information clearly and accurately
- Only sign documents that you are authorized to sign and believe to be accurate and truthful
- Make true or accurate entries or approve appropriately recorded funds or assets
- Make payments with appropriate supporting documentation
- Cooperate fully with internal and external audits and related requests

We must never conceal or confuse our records in any way or make false or misleading entries. We must not omit relevant information, make an inaccurate representation (whether in a document or verbally), or establish any undisclosed or unrecorded accounts, funds, or assets for any purpose. No disbursements of corporate funds or other corporate property should be made without adequate and appropriate supporting documentation.

It is your responsibility to report any concerns regarding questionable or fraudulent accounting or auditing matters or complaints regarding accounting, internal accounting controls or auditing matters. Such concerns or complaints should be raised promptly.

### RECORDS RETENTION

Company records must be maintained, stored and, when appropriate, destroyed in accordance with best practices and in compliance with applicable laws and regulations. Under certain circumstances, such as litigation and government requests, the Company may be required to preserve documents and information beyond their normal retention period. Never create, alter, or destroy records or documents for the purpose of impeding the efforts of any investigation, litigation or audit or other records request. You are required to review and comply with all record retention requests provided to you by Azurity's Legal Department.

### USE OF SOCIAL MEDIA

We must use social media mindfully and responsibly. Only designated employees may post approved content on behalf of the Company.

Please follow these principles whenever engaging on social media related to Azurity:

- Do not disclose material non-public information or other confidential, proprietary, or personal information on social media.
- Do not reference Azurity products or content related to specific pipeline or in-line products on social media unless approved by Legal.
- Do not engage with external inquiries unless authorized (see External Enquiries in this Code).
- Be responsible and exercise common sense and good judgment.
- Do not post any material that violates applicable harassment, discrimination, or retaliation rules.





When following Azurity social media channels, please follow the following guidelines:

- As long as the post comes from Corporate Channel(s)
- Social Media posts from Branded Channels (i.e., Horizant.com) may not be 'liked', shared or commented on.

See Azurity Social Media Guidelines available on Azurity Connect for more information or contact [compliance@azurity.com](mailto:compliance@azurity.com).

### POLITICAL ACTIVITIES

Expressing our political views and being involved in political activities as individuals is encouraged at Azurity. However, we must participate in any political activities only as individuals. We respect and support individuals' rights to participate in political activities using their own resources and done on their own time.

When involved in political activities, you must:

- Ensure that your personal political opinions and activities are not viewed as those of the Company
- Do not use Company time, property, money or equipment for personal political activities

