

Vistin Pharma's Code of Conduct



Vistin Pharma AS

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Dear colleague,

The demand on us as a global supplier of key pharmaceutical products and responsible member of the society are increasing. We have therefore updated our ethical guidelines to help all employees make the right choices and act according to the company's Code of Conduct.

This document is approved by Vistin's Board of Directors and applies to all employees as well as to board members of Vistin. It is important that you carefully read and understand this document which describes what we as Vistin employees can and cannot do. If you need assistance, you can speak to your line manager or contact the HR-department.

Kjell-Erik Nordby

CEO

1. Introduction

Vistin Pharma's Code of Conduct is built on Vistin's values and provides a framework for what we consider responsible conduct. This Code of Conduct is applicable to all Vistin Pharma employees. References made to "Vistin Pharma", "Vistin" or "the company" should be understood as Vistin Pharma ASA and its wholly owned subsidiaries. All Vistin employees must follow the rules of the Code of Conduct in their day-to-day business activities and always strive to exercise good judgment in everything you do for the company.

2. Scope and responsibility

Vistin's Code of Conduct applies to all employees, including temporary personnel, and to the members of the boards of directors of Vistin Pharma ASA and its subsidiaries. Line managers are responsible for making this document known to, and to promote and to monitor compliance, in their organization. Violation of this Code of Conduct will not be tolerated and may lead to internal disciplinary actions, dismissal or even criminal prosecution.

This document has been approved by the Board of Directors of Vistin Pharma ASA. Hereinafter, Vistin Pharma will be referred to as Vistin.

3. Our workplace

3.1 Human rights

Vistin is committed to respecting and supporting the human rights of all individuals potentially affected by our operations. These human rights are defined in the Universal Declaration of Human Rights and related UN documents.

3.2 Work conditions

Vistin is committed to an inclusive work culture. Vistin does not accept any form of harassment or discrimination on the basis of gender, race, national or ethnic origin, religion, cultural background, social group, disability, sexual orientation, marital status, age or political opinion.

3.3 Health, Safety and Environment

Vistin is committed to protect the health and safety of our employees and contractors. All employees shall demonstrate proactive commitment to HSE excellence through personal conduct and are encouraged to motivate colleagues to do likewise. Employees have the right to refuse to work in situations that may cause harm, and they have the responsibility to bring unsafe situations and behavior to the attention of others at risk and report to the management.

3.4 Expression of concern

Openness in the workplace shows a healthy corporate culture that serves both the company and its employees. Vistin considers that in a good working environment there should be a low threshold to speak of unacceptable conditions in the workplace. Criticism and disagreement shall be handled in a fair and orderly manner.

Normally, employees should discuss any concerns and complaints with their superior. If this is not appropriate, employees may address any other superiors or HR/EHS staffs. It is a violation of this Code of Conduct to counterattack anyone for reporting a concern. Likewise, it is also a violation of the Code of Conduct to submit a false report.

4. Business Conduct

4.1 Compliance with laws, regulations and internal guidelines

All employees shall comply with all applicable laws and regulations when conducting business on behalf of Vistin. In additions all employees must adhere to relevant Vistin policies and rules.

4.2 Corruption and bribery

Vistin does not tolerate corruption and bribery, whether direct or indirect. Employees must not, in the conduct of their work for Vistin, request, accept or receive any improper advantage that may influence their decisions.

4.3 Gifts and hospitality

Gifts and other favors can only be given or granted provided they are modest and provided the time and place are appropriate. In no event can the purpose of any gift, hospitality or other expenditure be to cause the recipient to improperly perform his or her duties. If you are offered or have received favors beyond common courtesy gifts you shall notify your immediate superior or HR department.

4.5 Corporate Social Responsibility

Charitable donations, sponsorships and community investments shall be based on a business case and should aim to benefit both the society and Vistin. All investments shall be based on the purposes to either

- a) Reducing waste and pollution
- AND/OR
- b) Contributing in educational and social programs

As part of Vistin's Corporate Social Responsibility, the Executive Management team annually chooses one charitable cause to support.

4.5 Data protection

Vistin protects information and data about current, former or potential employees, customers, suppliers or other business associates and their employees and other third parties, in compliance with applicable laws and regulations.

4.6 Accurate reporting

Vistin is committed to transparency and accuracy in all the company's dealings, while respecting confidentiality and other applicable obligations. As a matter of applicable laws and stock exchange listing standards, Vistin is obligated to provide full, fair, accurate and understandable disclosure in its periodic financial reports, other documents filed with applicable regulatory authorities and agencies as well as in its public communications.

5. Personal conduct

5.1 Conflict of interest

Employees shall not seek to obtain improper advantages for themselves or someone closely related, or in any other way harm Vistin's interests. Employees should avoid having a personal ownership interest in any other business or enterprise if it compromises or could appear to compromise their duties in Vistin. Before engaging in any activity that may be perceived to advance the interests of a competitor, customer, supplier or other business associates at the expense of Vistin's interests, including serving on the board of such a company, employees must consult with, and get approval from, your immediate superior. Employees may not use confidential information that has come to their knowledge in their service for Vistin for personal gain for themselves or others.

5.2 Use of company property

It is the responsibility of all Vistin employees and other representatives of the company to safeguard the assets and records of Vistin and its customers, suppliers and other business associates. All such assets shall be used and maintained with care and respect while guarding against waste and abuse. The use of materials, financial and other assets or facilities for the purpose not directly related to company business is prohibited without authorization from an appropriate Vistin representative. The same applies to the removal or borrowing of the company assets without permission.

5.3 Drug abuse

Vistin is a drug-free workplace. Employees may not be under the influence of intoxicating substances, including alcohol, while at work for Vistin. Limited amounts of alcohol may, however, be served when local custom and occasion makes it appropriate to do so, and provided the consumption will not be combined with operating machinery, driving or any other activities that are incompatible with the use of alcohol.

5.4 Confidentiality

Information other than general business knowledge and work experience that has come to your knowledge in service for Vistin shall be regarded as confidential and treated as such.

5.5 Insider trading

Inside information is non-public information received or learned through your work for Vistin or otherwise which, if publicly known, may influence the price of the company's securities. You shall refrain from trading or giving advice concerning trade in the securities of Vistin on the basis of inside information regardless of whether you are formally registered as an insider.

6. References

6.1 Laws and regulations

Universal Declaration of Human Rights (www.un.org/en/universal-declaration-human-rights/)

6.2 Vistin internal guidelines

Personnel handbook

Quality handbook

EHS handbook

Qualification and requalification of vendors