



**kaléo**<sup>®</sup>

**Partner**  
Code of Conduct



*At Kaléo, we strive to provide patients access to the innovative healthcare products and solutions that empower each of them to live fuller, bolder lives. In our pursuit to serve this mission, we seek to partner with organizations that possess a similar passion and maintain the highest ethical standards.*

*We expect our Partners to share a commitment to improving the lives of people and the communities we both serve. I'm thankful and proud that we have spotlighted two exemplary Partners in this Code which demonstrate this commitment.*

*Together, we can serve patients and their families by providing them with life-transforming products.*



Michael Wells, Chairman and CEO

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*Regarding scope and applicability, the use of “Partner” in this document is not limited to the legal definition of a contractual partnership. We consider all suppliers, vendors and third parties we work with to be “Partners” who help us bring value to patients and caregivers.*

# Introduction & Scope



Every day, Kaléo sets out to pursue our mission of inventing, manufacturing and providing life-transforming products that empower patients and families to live fuller, bolder lives. In doing so, we always want to work with Partners who value integrity. That means each of us must be committed to always maintaining the highest ethical standards. Acting with integrity in every situation earns the trust and respect of those we serve. We also strive for environmental, economic and social sustainability to better serve our communities and ensure long-term success at Kaléo. We believe that our Partners play an integral role in our sustainable growth and overall success.

We look to conduct business with Partners who share similar beliefs as Kaléo, specifically to our overall mission, values, and high ethical standards.

## Kaléo Guidelines & Policies

### The Kaléo Way

Early in the formation of Kaléo, we realized how important it is to have a set of meaningful values and behaviors. We thoughtfully and intentionally developed the following values that, collectively, are called The Kaléo Way.



### Conflicts of Interest

We expect our employees and Partners to be free of any potential, perceived or actual conflicts of interest. In the event a potential conflict of interest arises, it's our expectation that Kaléo will either notify or be notified promptly. At Kaléo, we seek to develop meaningful and collaborative relationships with our Partners. We believe some perceived conflicts of interests can be managed. It's imperative, however, Kaléo and our Partners discuss those situations early and before any actions are taken. Finally, it's our expectation that our Partners and prospective Partners will not offer gifts and other benefits to Kaléo employees. Those acts are unnecessary and create the appearance of bias informing future decisions or as a reward past decisions (e.g., sourcing selection, contract renewal, expanded services). If uncertain, Partners are to contact Kaléo's Integrity & Compliance Team.

Learn more at [kaleo.com/who-we-are/company-values/](https://kaleo.com/who-we-are/company-values/)

# Ethics



## Business Integrity, Reputation and Fair Competition

At Kaléo, we do not request, accept, receive, offer, or give anything of inappropriate value to influence a business decision or to gain an unfair business advantage. Similarly, we will not participate in other illegal inducements, including any action that would violate local, state, national or international bribery or corruption laws, including the U.S. Foreign Corrupt Practices Act (“FCPA”) and UK Bribery Act. Our business is conducted consistently with fair and vigorous competition and in compliance with all applicable laws.

Following the law is the minimum expectation of any Partner. We work with organizations that also demonstrate respect for the spirit of the law. We are mindful that working in healthcare requires that we hold ourselves to a higher ethical standard. Patients and caregivers depend on us and rightly expect more from us.

## Marketing and Promotional Practices

We operate in an industry with many laws and regulations that are designed to protect patients, improve the quality of medical products and services, and eliminate fraud and other misconduct. Many of these rules directly impact how we promote and sell our products, as well as how we exchange scientific information with the healthcare community. We hold ourselves and our Partners accountable for following all promotional laws and standards.

We expect those of our Partners who interact with Healthcare Professionals (“HCPs”) and Healthcare Organizations (“HCOs”) for us to comply with all applicable promotional laws, regulations, and industry codes and standards (e.g., the PhRMA Code, Innovative Medicines Canada). We do so to ensure that interactions with HCPs and HCOs are appropriate and demonstrate the highest ethical standards.



If not addressed in contractual obligations, we require that you receive the written consent of Kaléo prior to using, displaying or otherwise publishing the Kaléo name, product names, likeness, logos, trademarks, words, symbols, photography or other design elements associated with Kaléo or any product brand.

### Animal Welfare

We only conduct research on animals when necessary or when required by government regulatory authorities (e.g., FDA required pre-approval safety tests). We are committed to treating animals respectfully, with pain and stress minimized. Animal testing by Kaléo and our Partners is to only take place when necessary and only after consideration for alternative methods. Alternative means of testing will be utilized wherever scientifically valid and acceptable to regulators. If Partners have alternative views on animal welfare, it is expected to be discussed prior to any contracting discussions.

### Data Privacy and Information Security

We require our Partners to comply with all laws and industry standards concerning data protection that inform their work with Kaléo, including emerging laws and standards. We expect Partners to continuously improve their technical and organizational measures to meet and exceed industry best practices.

It is our expectation of Partners that they will collect or have access to only such Personally Identifiable Information (“PII”) as is necessary for the appropriate business purpose. We require the appropriate safeguards are put in place to protect the privacy, confidentiality and security of all collected PII. Safeguards are required to address the collection, processing, storage, transfer and destruction of PII. This includes responding in a timely and appropriate manner to data access requests and requests to no longer use an individual’s PII. Partners are required to implement and maintain policies and procedures to promptly and effectively detect and appropriately and compliantly respond to security incidents.

In addition to PII, we require our Partners will implement all appropriate technical, organizational security, and confidentiality measures to protect Kaléo data and confidential and proprietary information. This includes regularly updating such measures to ensure a risk-appropriate level of security for any use of Kaléo information.

We and our Partners are required to monitor and adapt to emerging laws and standards, and then to continuously improve our technical and organizational measures to meet and exceed industry best practices.

# Labor



## Diversity, Equity and Inclusion Commitment

At Kaléo, we are committed to fully appreciating and expanding our diversity of demographics, perspectives and experiences. We do so because it is the right thing to do and will increase company performance. We strive to hold ourselves and each other accountable to not only continually become better colleagues but to become better humans. We engage Partners who have the same aspirations for their colleagues and workplace.

## Modern Slavery and Child Labor

At Kaléo, we are committed to engaging Partners who are committed to the prevention of modern slavery (e.g., forced, bonded, indentured). We request Partners conduct their own due diligence to ensure their supply chain is free of slave labor. Additionally, we do not condone prison labor contributing to our supply chain.

We will not tolerate illegal child labor practices either by our Partners or those identified in our Partners' supply chain.

## Non-Discrimination/Fair Treatment

We are committed to a work environment in which all individuals are treated with dignity and respect. We expect that our Partners ensure all their employees

have the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices. Discrimination includes harassment based on race, color, religion, sex, pregnancy, childbirth, related medical conditions, sexual orientation, gender identity, national origin, age, disability, genetic information, and veteran or military status, or any other characteristic protected by applicable law.

## Wages, Benefits, Working Hours

In addition to complying with all applicable employment laws, we are committed to paying our employees a livable wage, overtime hours (for non-salaried employees), and appropriate employee benefits.

## Freedom of Association

Open communication and direct engagement with employees to resolve workplace and compensation issues is expected. We respect the rights of employees, as set forth in local laws, to associate freely, join or not join labor unions, seek representation, and join workers' councils, and we expect our Partners to do the same. We believe employees should be able to communicate openly with management regarding working conditions without threat of intimidation or harassment.

# Health & Safety



We are committed to providing a safe working environment for our employees and Partners, including their physical and mental well-being. Additionally, we operate in compliance with all health and safety regulations to ensure safety management systems are in place to prevent work-related injuries. We expect the same of our Partners. If applicable, our Partners are expected to participate in all Kaléo-required trainings, follow Kaléo's safety standards, and promptly report safety concerns.

We seek to work with Partners who are committed to protecting their

employees from over exposure to chemical, biological, and physical hazards. This includes safeguards for physically demanding tasks in the workplace and for appropriate protections in any company-provided living facilities.

We expect Partners will provide safety information and related training to inform their employees about performing their duties safely. If applicable, such information and training should address safeguards for working with hazardous materials (e.g., pharmaceutical compounds).



# Sustainable Environmental Practices

## Environmental Commitment

At Kaléo, we are a mission driven company, and that includes being committed to the communities in which we operate and how our work impacts the environment. We are continuing to evaluate how our teams and our Partners impact significant global and local environmental issues, such as climate change. As a company that outsources manufacturing, it's essential that Kaléo contracts with manufacturers who share in our commitment to progressive environmental sustainability practices. We've spotlighted two Partners who are committed to this effort.

## Environmental Authorizations

We evaluate our Partner's commitment to complying with all applicable environmental regulations, including obtaining all required environmental permits, licenses, and information registrations.

## Product Manufacturing Partner

We Partner with a manufacturer who manufactures all our products. They are committed to quality, reliability, and ethical behavior which aligns with how we approach our business through The Kaléo Way. They also strive to create, develop, and maintain relationships with their customers and employees. This Partner defines value through their robust processes and procedures that help ensure delivery of the highest levels of quality, reliability, and service throughout the lifecycle of their customers' products. They also define their purpose through initiatives pertaining to Environmental, Social, and Governance sustainability. This Partner has been heavily active in environmental, health and safety areas. Specifically, they pay close attention to environmental management, effects on carbon and climate, natural resources, waste and toxicity, and overall health and safety. They practice these beliefs at all of their manufacturing sites, where they've had measurable success (against ambitious goals) in reducing their environmental footprint. As a result, we can benefit from these initiatives and it serves as motivation to achieve our goals in environmental sustainability.



## Waste and Emissions Practices and Resource Management

We expect our Partners to have systems in place to ensure the safe handling, movement, storage, recycling, reuse, and management of waste and air emissions. At Kaléo, we value Partners who seek to reduce their carbon footprint through minimization, recycling, salvage and re-use efforts. One such valuable Partner is spotlighted below.

We are committed to working with Partners who limit their usage of unsustainable natural resources and who optimize their usage of renewable resources (e.g., solar, wind).

## Environmental Goals

We prefer to work with Partners who can demonstrate they have made publicly available environmental goals. If applicable to their business, it may include goals to reduce greenhouse gases, water usage, electrical usage and air emissions.



### Product Packaging Partner

We Partner with a vendor who provides all packaging for our products in the United States. They are committed to developing and distributing durable and environmentally sustainable packaging materials. In addition, they focus on strong communication and building of relationships with their customers, which aligns with our company values. As part of their commitment, their primary goals are to get product to customers on time, create a smaller footprint through their packaging products, leverage a simple package design, and provide sustainable curbside recyclable shipping solutions. Their combination of vendor programs and recyclable materials makes them a valuable packaging Partner. They have developed and distribute an environmentally friendly alternative to shipping materials. Through their efforts, our products are now shipped in 100% curbside recyclable materials. This product not only simplifies our shipping solutions, but also moves us forward in our environmental sustainability goals.

# Company Governance

We expect our Partners will demonstrate commitment to the shared principles outlined in this document by allocating the appropriate resources. Effectively deploying resources requires good governance. Partners should have mechanisms in place to determine and manage risks in all applicable areas addressed by this document. Good and effective governance holds companies accountable to meeting their commitments and appropriately managing risk. Kaléo believes that good governance is not limited to meeting revenue targets and mitigating risk. Good governance practices can also be applied to meeting DE&I and environmental objectives. Below are additional pillars requiring good governance:

## Legal and Customer Requirements

We expect our Partners to identify and comply with all applicable laws, regulations, and standards. We also expect our Partners to follow the applicable requirements of other organizations with whom they interact for Kaléo (e.g., following hospital rules when performing services for Kaléo).

## Training and Competency

We expect our Partners to train their employees to achieve an appropriate level of knowledge, skill, and ability to manage and address the expectations that are contractually agreed upon (e.g., complying with applicable laws). Training and demonstrated competency will be addressed in Kaléo audits.

## Continual Improvement

We expect our Partners to continually improve by setting performance goals, executing implementation plans and taking corrective action for gaps identified by internal or external assessments.

## Documentation

We expect our Partners to maintain documentation necessary to demonstrate understanding of the expectations outlined in this document and compliance with applicable laws and regulations.



# Concerns & Questions



If concerns arise with any of the principles contained within Kaléo's Partner Code of Conduct or there are areas in which we can do better, we want to hear from you. In addition to your business contact at Kaléo, we have established a variety of ways for you to report concerns about Kaléo, its employees, or other stakeholders. The following avenues are available to you to ask questions and raise concerns:

<b>Office of Integrity and Compliance</b>	<a href="mailto:compliance@kaleo.com">compliance@kaleo.com</a> 111 Virginia Street Suite 300 Richmond, VA 23219	Partners are encouraged to contact Kaléo's Office of Integrity and Compliance directly with any questions or concerns.
<b>Chief Integrity Officer</b>	<a href="mailto:compliance@kaleo.com">compliance@kaleo.com</a> 804-325-3034	The Chief Integrity Officer may be contacted to discuss any concern or feedback related to Kaléo efforts to create a more ethical, equitable and inclusive workplace and to have a meaningful environmental and social impact on the communities we serve. This includes Kaléo's and our Partners' ethical business practices and compliance with external laws and regulations.
<b>Kaléo Compliance Helpline</b>	877-338-3039 <a href="https://lighthouse-services.com/kaleopharma">lighthouse-services.com/kaleopharma</a>	<p>The Kaléo Compliance Helpline (Helpline) is always available for anyone to anonymously contact the company about a concern or get information.</p> <p>The Helpline is administered by an independent outside contractor to allow confidential and anonymous reporting. Though not required, those who contact the Helpline are encouraged to leave a name and phone number in case additional information is needed.</p>