



Adium

CODE OF ETHICS

**EFFECTIVE AS OF:
01/DEC/2020**

CODE OF ETHICS

ADIUM PHARMA



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1. INTRODUCTION AND VALUES

ADIUM PHARMA (hereinafter “ADIUM PHARMA” or the “Company”) has high standards of ethical behavior in all its undertakings and is firmly committed to conducting its business in compliance with the letter and spirit of the law. The Company and the business environment in which we operate are highly dynamic and changing, but our commitment to legal and ethical behavior remains constant.

No company can state that the right course of action is always clear. In order to dispel any doubts that may arise in the performance of our duties, the Company implements this Code of Ethics (hereinafter, the “Code”), evidencing our compliance with the laws and good business practices.

We encourage all Company contributors, with no distinction whatsoever, to read this Code carefully, to keep it in mind at all times, and thus act with integrity and honesty.

OUR VALUES UNDERLYING THIS CODE OF ETHICS ARE:

- I. Integrity**
- II. Sense of urgency**
- III. Passion**
- IV. Transparency**
- V. Adaptability to change**
- VI. Commitment/Sense of belonging**

2. SCOPE AND CONTINUOUS MONITORING OF THE CODE’S EFFECTIVENESS

The content hereof applies to all Company contributors and ADIUM PHARMA is always open to communication. All contributors are encouraged to share openly with any member of the Compliance Committee any doubt, question or comment regarding the interpretation and application of this Code.

In addition, Directors and the Compliance Committee continuously review the effectiveness of this Code, aiming at ensuring that all activities are carried out with high ethical standards.

“Contributor” refers to any Company employee, external consultant providing regular services to the Company (either under a contract or not), and employees or persons hired by third parties providing services to the Company.



3. CONTINUOUS TRAINING

Ethical education is key to the successful operation of ADIUM PHARMA. For this reason, the Compliance Committee has implemented a plan to train all Company contributors in this regard.

The HR Department shall be responsible for ensuring the distribution, receipt and compliance of this Code by all contributors. The Compliance Department shall be responsible for ensuring that the training plan is received by all Company contributors.

4. CODE OF ETHICS - RESPONSIBILITIES

GENERAL CONSIDERATIONS

One of the major responsibilities of ADIUM PHARMA's contributors and Directors is to comply with all legal regulations in force, the Company's internal policies, and this Code of Ethics.

However, we believe that no written code can, by itself, guarantee compliance with the law and good practices. Therefore, the collaboration of each Company member is necessary to this end.

Some examples of how to proceed correctly include:

- Acting in accordance with the laws and complying with ADIUM PHARMA's policies and procedures.
- Maintaining high ethical standards, as set forth in this Code.
- Acting with sincerity, transparency, honesty, integrity and respect in all activities in which ADIUM PHARMA participates, always protecting its reputation and public image.
- Respecting co-workers, government agents, business partners, competitors or any other person or entity with whom contributors interact on behalf of ADIUM PHARMA.
- Asking the contributor's direct manager, Senior Area Manager, or by the means detailed in this Code whenever there are questions about ethics and/or internal policy issues.
- Reporting any act breaching the law, this Code, or Company policies. Any attempt to exert pressure on any contributor to perform acts that may be considered ethical violations must also be reported.
- Cooperating in Company investigations related to non-compliance with this Code of Ethics, always telling the truth.
- Avoiding conflicts of interest regarding work and personal matters.

Additional responsibilities of the Board of Directors and Senior Management.

In addition to the above, each Board member, General Manager, and all their subordinates are expected to:



- Always act in compliance with applicable laws and regulations.
- Show model behavior in line with this Code of Ethics and, in turn, encourage their subordinates to observe the same behavior.
- Encourage the reporting of potential violations of the law or this Code.
- Ensure that direct subordinates and other staff have proper knowledge, training and means to follow and comply with the established Compliance policy.
- Respond and interact with care and respect, and ensure that there is no retaliation for concerns or complaints raised by contributors regarding violations of this Code.

All statements included in this Code are intended to guide on the right action, regardless of whether any contributor concerned about whether or not a certain behavior complies with this Code of Ethics should raise the matter to his/her direct manager, Senior Area Manager, General Manager, or Compliance Committee.

The formal means of communication are set out in Chapter 6 of this Code, under the heading: "Reporting Concerns."

5. OPERATING BY GOOD PRACTICES:

Some good practices guidelines which shall be followed by all those working at ADIUM PHARMA include:

- Laws and regulations on safety and the environment

ADIUM PHARMA is committed to promoting a safe and healthy work environment for all, and to protecting and preserving the environment. To this end, the Company complies with environmental, health and safety laws, policies, procedures, and regulations.

Contributors must report any incidents that affect the environment, cooperate with environmental investigations, engage with corrective actions, and finally participate in any training organized or provided by Company on the subject.

- Government inspections and requirements

The marketing of pharmaceutical products is subject to complex government regulations and, consequently, the Company's facilities receive periodic inspections by different entities. The Company fully and strictly complies with all requirements of local regulatory agencies and is committed to the highest quality control standards. All ADIUM PHARMA contributors handling information, records, communications, or submissions to government agencies must do so diligently, accurately, in full, with absolute integrity and showing a cooperative attitude during inspection periods.



- Product quality

Maintaining high quality in the products marketed is one of the keys to ADIUM PHARMA's success. Therefore, the Company complies with all existing quality regulations and with its own standards, while being very strict in complying with quality control procedures.

- Product inventories

Keeping appropriate inventory levels with direct and indirect customers, reflecting their expected demand, or supported by special circumstances, and consistent with inventory management policies.

- Ethical business operations with third parties

The interaction of any member of the Company with consultants, suppliers, customers, competitors, patients, potential patients, and government officials shall be lawful, fair and equitable. Antitrust and free competition laws, to which ADIUM PHARMA fully adheres, are based on sound competition in price, quality and service. ADIUM PHARMA does not participate in any type of transaction or business activity that breaches the law.

ADIUM PHARMA contributors shall not enter into any agreement with current or potential competitors about pricing policies, discounts or other marketing condition; distribution of their market share or customers; nor should they agree with current or potential competitors about selling or not selling Company or third-party products.

ADIUM PHARMA contributors shall not bribe customers, suppliers or any other person or entity, either public or private, under any circumstances.

ADIUM PHARMA contributors shall not cooperate with or encourage any party to not comply with any laws, taxes or defraud the interests of minorities or creditors. Therefore, no payment shall be made to any third party (customer, supplier, distributor, agent, advisor, etc.) or to entities indicated by a third party if, after a reasonable investigation, such payment shall mean a violation of any rule or injury to third parties. In addition, payments shall not be made to unidentified bank accounts.

- Prices

- All price-related information provided by ADIUM PHARMA to its public or private customers and other stakeholders is of great importance and must be accurate and in accordance with current legislation.

ADIUM PHARMA distributors shall follow established internal procedures and obtain approvals from Company executives authorized to grant prices, discounts, and any other business condition to third parties.



- Agreements with third parties

All Company contracts shall be negotiated and signed by the executives appointed by the General Manager and/or Legal Representative. Agreements for the acquisition of goods and services shall be made in accordance with the Company's Purchasing Policy.

- Money laundering and smuggling

ADIUM PHARMA does not facilitate, tolerate, or support smuggling and/or money laundering. Therefore, the Company works with governments to prevent any illegal trade that may involve its products.

To do this, the Company's contributors shall reasonably ascertain the integrity of potential customers, for example, by confirming that they have a registered physical establishment, communicating the Company's compliance policy in this regard, reviewing their business practices and, if necessary, refusing to do business with those outside the law, promptly reporting to the Compliance Committee or General Manager any suspicious activity or transaction involving a customer.

- Customs and taxes

As a general rule, all products the Company imports are subject to several customs and tax regulations.

ADIUM PHARMA contributors involved with this activity shall comply with all legal requirements and provide accurate and true information.

- Anti-corruption and anti-bribery laws

ADIUM PHARMA does not allow offering any gifts or favors to suppliers or potential suppliers of goods and/or services or their contributors, neither to customers or potential customers, nor their contributors with whom contributors have business relationships or are negotiating or attempting to negotiate agreements, except gifts that are reasonable, modest and in accordance with conventional business practices, worth up to USD 100. These exceptions must be approved by the contributor's immediate supervisor.

On the other hand, the Company does not allow accepting any gifts or receiving any favors from suppliers or potential suppliers of goods and/or services or their contributors, neither from customers or potential customers with whom contributors have business relationships or are negotiating or attempting to negotiate agreements, except gifts that are reasonable, modest and in accordance with conventional business practices, worth up to USD 100. These exceptions must be approved by the contributor's immediate supervisor.

In line with the above, it is not allowed accepting and/or offering personal gifts in the form of cash or cash equivalents. As a general rule, no gift can be accepted, which, by virtue of its value, may condition the operation in future businesses with the third party offering the gift.

If questions arise about the reasonableness of giving or receiving a gift, favor or entertainment, the Compliance Committee should be consulted and will determine the action to be taken. If such consultation is not possible, the Compliance Committee should be informed of the gift.

Finally, ADIUM PHARMA follows the principles of the U.S. Foreign Corrupt Practices Act (FCPA) of 1977 and makes no payment, gifts or favors to any person in a position of influence, such as government officials or corporate officers, to induce them to violate their duty or to obtain favorable treatment in negotiations or the granting of contracts.

Also, it is not allowed making any payment, directly or indirectly, to any person who has an influential position in the decision-making of operations related to ADIUM PHARMA, in an attempt to influence such decision.

It is not allowed using illegal means to collect information on any commercial matter in general, and particularly on those subject to research, studies or analysis by ADIUM PHARMA.

Fees paid to agents or consultants shall be reasonable and in accordance with good business practices.

- Third-party donations policy

The Board of Directors and General Manager of ADIUM PHARMA are aware of and adhere to the current donation restrictions.

Any donation or contribution to government bodies, public entities, institutions, or political parties must be approved by the Company's General Manager and/or Board of Directors.

- Conflicts of interest

ADIUM PHARMA contributors are responsible for performing professionally and should not consider personal gain when doing business on behalf of the Company.

Consequently, situations in which personal interest conflicts with those of the Company should be avoided. All negotiations with suppliers, customers or any other person or entity should be always done for the benefit of ADIUM PHARMA and, obviously, no payments of any kind should be sought or accepted in exchange for doing business.

Conflicts of interest may arise if family members, friends or other persons close to contributors of the Company work in or serve customers, suppliers, competitors or any other entity related in any way to the Company, as well as if the Company's contributor has any direct interest in the third party providing services, goods or being a competitor of the Company. If such a situation occurs, the contributor must promptly inform the Compliance Committee that, if appropriate, he/she will take appropriate action.

The "Declaration of Conflicts of Interest" is attached to this Code, so that each contributor can report the appropriate situation to the Compliance Committee through the HR Department. All contributors must complete this statement, even if they have no conflict to declare. This declaration shall be made at the time of the contributor's entry to the Company and shall be renewed every year or when there is any conflict to be declared prior to such renewal.

As a general rule, no personal interest should influence the ability to perform work duties and responsibilities objectively.

As mentioned under the section "Anti-Corruption and Anti-Bribery Laws" of this Code of Ethics, contributors must be very careful in accepting gifts and must comply with the provisions detailed hereunder.

- Company policies - Internal controls

ADIUM PHARMA has internal policies and procedures for its various activities, and contributors are responsible for knowing and complying with them. However, there may be situations where a policy cannot be fully complied with. Therefore, not every partial breach of a Company policy is considered a violation of this Code.

In order to ensure that specific policy sections of the Company are compatible with this Code, the supervisor of the contributor doing the exception to the Company's internal procedure must report the matter to the General Manager and/or Compliance Committee, along with a brief explanation of why it was considered valid in such circumstance.

If a contributor is led to deviate from a Company policy and considers that such diversion may constitute a violation of this Code, he/she must personally inform the Area Manager about the matter, as well as any concerns about the channel established in this Code (Appendix "Complaints Procedure").

- Reliable financial information

All ADIUM PHARMA members work hard to achieve excellent business results. In the search for this objective, financial, cost, sales and other information reports should be prepared in an honest, complete and accurate manner.



ADIUM PHARMA contributors should never record any false entry in a report, alter or destroy any Company information, except those authorized by procedure, and should not sell or transfer Company assets without the corresponding authorization and documentation.

On the other hand, contributors must cooperate by responding in due time and form to the requirements of internal and/or external auditors.

6. REPORTING CONCERNS

ADIUM PHARMA encourages all contributors to report any situation or behavior that they deem to be contrary to this Code of Ethics or that constitutes a violation of the law and/or any Company policy. The Company's Management has established a procedure for reporting concerns (this procedure is included as an annex to this Code under the name "Complaints Procedure").

ADIUM PHARMA guarantees that there shall be no retaliation against anyone who, in good faith, reports a possible breach of this Code of Ethics or inquires as to whether a certain behavior constitutes a violation. ("In good faith" means an honest report, even if the person does not know all the facts or if it is true that a breach has occurred. A report that is intentionally false shall not be considered "in good faith").

This Code must always be complied with by all contributors. Exceptions to the compliance thereof shall be approved only by the Board of Directors and Senior Management in writing.

How to raise a concern related to this Code of Ethics

As noted above, ADIUM PHARMA encourages the reporting of any behavior of any Company contributor that may constitute a breach of this Code of Ethics. The formal procedure used to file such claim is the following:

- Website: Entering the website <https://denuncias.adium.com.uy>

At the informant's discretion, the communication may be anonymous or indicating his/her first name, last name, and contact details.

Although it is not mandatory, all contributors are encouraged to report their name and telephone number to contact them, as this facilitates the investigation should any additional data be needed. The process for using this procedure is:

- 1) Entering by clicking on "Enter Report."
- 2) Explaining what happened. A number of case-related questions will be asked.
- 3) Telling us how to contact you to help us resolve the case. If you do not wish to make yourself known, you can file your report anonymously.

Another channel is directly contacting any member of the Compliance Committee as deemed appropriate.

Please remember that this reporting system protects the anonymity of those filing the complaints. The complainant's identity will be kept confidential as long as circumstances allow for it. This means that the name may be revealed to those who need to know it to carry out the investigation. Additionally, in some cases, ADIUM PHARMA may be required by law to disclose the complainant's identity.

The Company encourages contributors to provide as much detail as possible to facilitate an in-depth investigation and achieve the ultimate goal of correcting any non-compliance.

7. RULES OF COEXISTENCE IN OUR WORKPLACE

We have established the following rules of coexistence that allow us to operate within a healthy environment:

- Equal employment opportunities

ADIUM PHARMA undertakes to offer equal employment opportunities, not allowing any discrimination and/or harassment of applicants or contributors on the basis of their race, color, religion, nationality, sex, age, sexual orientation, disability, or any other condition covered by local laws. To access job opportunities offered by the company, applicants must be competent and have a good performance in the duties to be fulfilled. It is the Company's duty to provide all necessary resources to persons with disabilities.

- Policies against discrimination and harassment

Discrimination and harassment are prohibited in ADIUM PHARMA. This includes any improper behavior by all contributors and non-contributors, such as customers, suppliers, consultants, etc. Discrimination and harassment in any form constitutes a violation of ADIUM PHARMA's policies and values.

- Anti-discrimination policy

Discriminatory practices include employment decisions, such as recruitment, training, promotions, area transfers, demotion, or dismissal, which are based on the following conditions of a contributor and not on his or her job qualification or performance: race, color, gender, sexual orientation, religion, age, nationality, disability, and any other condition under local laws.

At the same time, the following forms of behavior, among others, are particularly prohibited:



- Written: cartoons, e-mails, posters, drawings or photographs aimed at discriminating against any person.
- Verbal: nicknames, derogatory comments, slander or jokes aimed at discriminating against any person.
- Physical: attacks or blocking a person's movements.

- Anti-harassment policy

The Company is committed to maintaining a positive work environment, free from any harassment. Behaviors that have the purpose or effect of significantly interfering with the performance of individual work or creating an intimidating, hostile or offensive environment are considered harassment.

Sexual harassment is defined as inappropriate sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when:

- Submission to such conduct is, explicitly or implicitly, a condition for obtaining or maintaining employment.
- Submission or rejection of such conduct is used as a basis for decisions affecting an individual's employment.
- Such conduct has the purpose or effect of creating an intimidating, hostile or offensive work environment.

Sexual misconduct is expressly prohibited in the Company. Such conduct includes, but is not limited to, the following implicit or explicit sexual communications:

- Written: cartoons, posters, calendars, notes, letters, e-mails.
- Verbal: comments, jokes, inappropriate or obscene language of a sexual nature, commenting or asking questions about another person's sexual life, repeated requests for dates.
- Physical gestures or other non-verbal behaviors.
- Unwanted rubbing against another person's body.

Complaint procedure:

Contributors who experience discrimination and/or harassment have several alternatives to report their case. First, they can report the incident to their manager, who shall investigate the case and raise the claim to the HR Department. If the contributor perceives that he/she should not file the report with his/her manager, he/she must report the incident to the Senior Area Manager or the HR Department.

Finally, contributors also have the possibility of channeling the complaint through one of the procedures described under “Reporting Concerns.”

If ADIUM PHARMA determines that a contributor's behavior breaches this policy, appropriate disciplinary action should be taken, which may include the termination of employment.

ADIUM PHARMA prohibits any form of retaliation against a contributor who files a complaint under this policy or for assisting in an investigation. If any contributor perceives that he/she may receive retaliation for filing a complaint or participating in an investigation, he/she must report the situation to the Senior Area Manager or HR Department, which will be immediately investigated.

- Personal files

The Company has personal records of each contributor. These records are owned by ADIUM PHARMA and include work-related documentation, such as performance evaluations, benefit-giving forms, and other records. If any contributor is interested in reviewing his/her file, he/she should contact the HR Department to schedule an appointment.

To ensure records are up-to-date, contributors shall notify their manager or the HR Department of any changes in their name, telephone number, home address, marital status, number of persons in charge, beneficiary designations, education and training, emergency contact, and any other relevant information.

- Property owned by the Company

Contributors are responsible for the good use of the Company's assets. All contributors should be alert to situations where these goods are misused, lost or stolen from the Company.

Note that all goods provided by the Company for daily work are owned by ADIUM PHARMA and not by contributors.

- Confidential information

ADIUM PHARMA has information from its contributors, customers and different entities with which it interacts, which is very important to the business. Improper use or disclosure of this confidential information may harm the Company, which is why it must be always handled within the legal framework.

Contributors handling confidential information must safeguard it, share it only with authorized persons, and use it only for purposes within the legal framework. At the same time, they must have adequate security measures to protect information from destruction, alteration or access by unwanted third parties.



In the event of termination of the employment relationship, the Company's information held by outgoing officials shall remain confidential for a term of 5 years.

- Safety and healthy living

The safety of people at the Company's premises is a priority for ADIUM PHARMA and those responsible for each area must ensure that safety standards are complied with. All contributors should be aware of safety regulations in their area, including emergency plans and, in turn, should report any insecurity, accident, or injured persons within the scope of the Company or any other abnormality they detect related to this topic.

At the same time, ADIUM PHARMA does not tolerate violence in any form. Contributors should immediately report verbal offenses, physical assaults, or violent behavior.

At ADIUM PHARMA we work in a healthy environment, free of alcohol and drugs. If a contributor is under the influence of alcohol and/or drugs, he or she must not participate in any activity associated with the Company, inside or outside the Company's premises.

If there are persons with any type of addiction, they are encouraged to seek help from the appropriate centers. For further information, contact the HR Department.

- Discipline

Good working relationships are built on the basis of respect among individuals.
All guidelines described in this Code reach contributors at all levels of the organization.

Contributors must meet all job, performance, and behavior expectations determined by the Company. Failure to do so may result in actions such as notice, warning, written warning, suspension or termination of the employment agreement.

In the event of any act of insubordination, the respective manager shall decide, at its discretion, which of these actions is the most effective to correct the situation.

Disciplinary actions may also be directed against managers ignoring violations of this Code or omitting to correct any violation.

Note that the sale of personal products, such as clothing, electronics, CDs, DVDs, etc., is not permitted within the Company's premises

All acts of insubordination shall be considered individually, based on the contributor involved, his/her seniority, usual behavior, and the facts of each case. Therefore, the enforcement or not of corrective actions to a case does not oblige the Company to resolve equally regarding other acts of insubordination.



- Communication tools and internet use

All computers, cell phones, electronic devices, communication, computer, information and services systems, and all programs that ADIUM PHARMA makes available to contributors (the "Communication Tools") are work items and their use should be limited solely to the performance of work duties. As such, they must be only used for work activities in ADIUM PHARMA and not for personal purposes, such as personal communication, recreation, leisure, etc.

All Communication Tools are the property of ADIUM PHARMA, as well as any correspondence, message, file, data, or other electronic information found in any Communication Tool (even prior to the implementation of this Code), or that they are transmitted to one or more persons through the use of the computer interconnection network that ADIUM PHARMA makes available for use within the framework of their work activity.

Communication Tools are work items and should be used exclusively for the fulfillment of work purposes. Notwithstanding the above general guidelines, and as a matter of exception and not a rule, they may be used in a limited way, for the purposes of personal communication and/or recreation/leisure, in accordance with standards of reasonableness, prudence, discretion and common sense and provided that: (i) it does not interfere with the performance of the contributors' tasks or the ability to perform work activities; (ii) it does not have any impact on activities related to the work of other contributors; (iii) it does not cause delays or degradation of the network's performance; (iv) it does not expose the Company to damage or adverse situations; (v) it does not expose the computer resources or network to damage or adverse situations (viruses, hackers, etc.); (vi) it does not involve the transmission of confidential information of the Company, its employees or self-employed personnel, colleagues, work teams, internal and external managers and/or customers; and (vii) in no case may they be used to access pornographic and/or racist content, or in any way instigate or promote hatred or criminal acts in general.

Communication Tools shall be used in strict accordance with the following guidelines:

- A.** Goods and services purchased through the Internet must have the corresponding purchase application and purchase order established by the Company's procedure. Contributors must verify and ensure that approved purchases are made only through suppliers previously authorized by ADIUM PHARMA in writing.
- B.** ADIUM PHARMA credit cards may only be used with the prior authorization of Finance personnel and duly authorized in writing for this purpose.
- C.** Contributors are prohibited from providing information on the Internet (or any other means) that does not represent the interests of ADIUM PHARMA. By way of example, any of the following practices or behaviors are strictly prohibited:



- a. Sending Company information for mailing lists.
 - b. Sending e-mail addresses to unknown organizations.
 - c. Getting involved in blogs or instant messaging.
 - d. Providing any information about the Company's operations, assets, personnel, and business without the prior written permission of the General Manager, Financial Manager, HR Manager, IT Manager, Legal Department, or Compliance Committee, as appropriate.
- D.** Contributors must be aware of the confidentiality to which they are bound, particularly, but not exclusively, when using any Communication Tool.
- E.** It is prohibited to reproduce, download and/or replicate any inappropriate, offensive, xenophobic, racist, hate- or crime-inciting material, and/or pornographic material, during working hours and/or through any Communication Tool.
- F.** Personal use of the chat room or instant messaging services is considered as unacceptable use of the Internet.
- G.** ADIUM PHARMA contributors are prohibited from transmitting, through any Communication Tool, copyrighted content property of any third party. Internet users are not permitted to copy, transfer, rename, add, or delete information or programs belonging to other users unless they have the express written permission of the author of such information or program.
- H.** Any time confidential documents and/or information are sent through any Communication Tool, the Sender must ensure that the correct address of the recipient is used, whether it is a member of the Company or a third party. The sender must be aware of who may have access to such information/documentation in addition to the intended recipient. It is prohibited to send, through any Communication Tool, information/documentation considered extremely sensitive, whether that information/documentation is directed to ADIUM PHARMA personnel or to any third party.
- I.** Contributors are prohibited from posting Company material and/or photographs on web portals, social networks and/or applications, including, for example and without limitation, Facebook, Instagram, Twitter, YouTube, or any other, either current or future. It is for the Company to determine the appropriate channels, either its own or of a third party, to define which material and/or photographs to publish.
- J.** If any contributor needs to download files or programs to the ADIUM PHARMA network, he/she should proceed as follows:



- i. It can only be done with the permission of the contributor's direct manager, in the case of files, or authorized IT staff, in the case of programs.
 - ii. Contributors are advised that downloading unauthorized programs and files may contain malicious codes (viruses) that affect the network and the systems' operation.
 - iii. As set forth in the Company's software policy, programs that have not been previously approved for IT use must not be downloaded or installed.
 - iv. Any software originating from the Internet must be previously investigated, approved, and installed by the Company's IT personnel only.

- K.** The use of ADIUM PHARMA's e-mail system is limited to ADIUM PHARMA personnel or to third parties indicated by ADIUM PHARMA. At the end of the employment relationship with ADIUM PHARMA, the use of e-mail, cell phone and Internet access is automatically canceled. Therefore, former contributors of the Company are prohibited from using any Communication Tool after the end of his/her employment relationship.

- L.** Receipt of resumes for recruitment purposes should be immediately redirected to the HR Department.

- M.** No Communication Tool can be used to: (i) make and/or induce acts of proselytism in favor of companies, religious or political causes, or external organizations; and (ii) disqualify persons, whether or not they are Company employees, colleagues, work teams, managers and/or internal and external customers. Appropriate and respectful language should be used at every opportunity when a Communication Tool is used, whether the contributor addresses other members of the Company or any third party.

- N.** Communication Tools may not be used to post offensive and/or destructive messages and/or messages that incite hatred or contempt, whoever is the recipient of those messages, members of the Company or third parties. By way of example and without any limitation whatsoever, messages that, explicitly or implicitly, include sexual content or implications, racial defamation, gender-specific comments, or any other comment that deals offensively with age, sexual orientation, race, color or ethnicity, religious or political beliefs, nationality, or the disability of a person, are considered offensive.

- O.** Communication Tools should not be used to send or receive copyrighted materials, trade secrets, proprietary financial information, or similar materials without prior written authorization.

- P.** Contributors are not authorized to retrieve or read any e-mails that are not sent to them. Any exceptions to this prohibition must be approved in writing by the recipient of the e-mail. If it is not possible to obtain the recipient's consent and if, for any reason, it is necessary for work-related reasons to access such e-mail, prior written authorization must be requested from the joint manager of the contributors in question.



For more details about the Company's information systems and Internet use, please refer to the "Information Security Policy and Regulations Manual".

The direct supervisor shall be notified of any use of information and/or Communication Tools that is not in accordance with the foregoing and shall take appropriate penalties and/or disciplinary actions.

Each contributor shall be responsible for the Communication Tools entrusted by the Company, as well as all messages originating from their mailbox on the Company's account. The Company may use the Communication Tools when and as it may, reserving the right to access the various corporate e-mail accounts (and any personal messages therein), being able to monitor the use of corporate mail, even for personal purposes and even in relation to messages prior to the implementation of this Code, and to suspend or cancel the use of any Communication Tool if detecting any misuse.

The contributor's failure to comply with any of the obligations arising from this chapter shall be considered to be a serious fault and fair cause for termination of the employment agreement for gross misconduct. The above notwithstanding the Company's right to claim any damages and any criminal actions that may correspond.

8. OPEN DOORS POLICY – FINAL MESSAGE

Effective two-way communication is essential for succeeding in this area. It is unavoidable that during the course of our work doubts or disagreements will arise regarding the enforcement of this Code or the Company's policies, such as an order received by a contributor's boss, work assignments, or something that was experienced or observed. It is beneficial for all to see such doubts and disagreements clarified and resolved quickly.

In the event of any problem regarding a work issue, discuss it with your supervisor honestly. Usually, this talk should be held three to five days after the incident. Timely exchanges of opinion help solve problems, as they are fresh in everyone's memory. Your supervisor is an important person for you and for your success in your job.

If you are not satisfied after discussing the problem with your boss, or if it is not appropriate to address it, the company has an "open door" policy. Issues may be raised to a member of the HR Department and/or to higher management levels. If a different solution is needed, please contact the General Manager or the Compliance Committee who will take the case.

Note that failure to comply with this Code of Ethics enables the Company to take disciplinary actions, which may include dismissal. The kind of sanction will depend on the nature of the offense and will be subject to the labor law in force.



Adium

CODE OF ETHICS

**EFFECTIVE AS OF:
01/DEC/2020**

10. RECEIPT AND ACCEPTANCE OF THIS CODE OF ETHICS

I hereby declare that I have received, accepted and complied with ADIUM PHARMA's Code of Ethics.

First and last name

SIGNATURE

DATE

Original: ADIUM PHARMA HR Department

Copy: ADIUM PHARMA contributor