Code of Conduct

Making it happen the right way

Introduction

This is the Lakefront Code of Conduct, in which we reflect on what making it happen the right way means to us.

Whether you are a Lakefront employee, director, officer, supplier or partner, our Code of Conduct serves as a guiding light to **inspire and empower you**. Regardless of your seniority or rank, we take ownership of our actions and make a commitment to one another to uphold the principles within this Code.

Together with our network of carefully selected suppliers and external partners, we make it happen. We therefore hold them to the same high ethical standards that we hold ourselves to, expecting their operations to align closely with the principles outlined in our Code. Like a compass our Code of Conduct **guides your journey at Lakefront**, directing you toward ethical decision-making and actions that will help you in making it happen the right way.

Chapter 1 - First and foremost, we work with and for Patients. They are our first consideration in every decision we make. 3

Chapter 2 - We are proud of the way we do business. We are ethical. We are honest. We are transparent. 4

Chapter 3 - We are responsible corporate citizens. Our actions are thoughtful and considered. 5

Chapter 4 - We show courage in the face of adversity. We speak up for what is right, and we listen when someone speaks. 6

Chapter 5 - We believe that there is strength in individuality and diversity. We do not tolerate harassment or discrimination of any kind. 7

Chapter 6 - As a member of the UN Global Compact, we uphold high standards throughout our supply chain. 8

Chapter 7 - We feel empowered to make the right choices and we therefore hold ourselves accountable for our actions. 9

Chapter 1 - First and foremost, we work with and for Patients. They are our first consideration in every decision we make.

*We must not only imagine a better future for patients; we must work consistently: **make it happen** to make a difference and **do it the right way** to harvest meaningful and lasting results. We must prioritize humanity and quality above all.*

Promise: We put Patients first. Always.

- Patients are our North Star. Their unmet needs are our motivation.
- We will make it happen by imagining a better future for patients and prioritizing humanity and quality above all. We will make a difference in the right way in order to achieve meaningful and lasting results.
- Whether in relation to clinical studies, research and development or working with our partners, such as Healthcare Professionals or Patient Organizations, the safety and wellbeing of Patients come first.
- We comply with all legal and ethical obligations including ICHGCP, EU Directives and FDA requirements in the conduct of our clinical trials. We apply appropriate oversight of all activities to ensure these obligations are upheld.
- We listen to Patients, in order to better understand their needs and preferences.
- We treat Patients with empathy, compassion and care.
- Any information we share about our products and pipeline is accurate, balanced, fair, objective and substantiated.
- We do not share off-label information with Patients and if ever we are approached by Patients for information on their treatment, we direct them to their Healthcare Professional.
- Complaints or concerns that we receive about our products will be dealt with as a matter of urgency.
- We support Patient Organizations to achieve better outcomes for Patients. In doing so, we respect the independence of the Patient Organizations we work with and will never attempt to unduly influence them.
- We are committed to working with Patient Organizations at the highest levels of transparency and ethical standards.
- We recognize the trust that Patients place in us. We only collect or use their information for valid reasons and are transparent about the purpose for which we are doing this.
- We protect Patient privacy and data at all times.

Chapter 2 - We are proud of the way we do business. We are ethical. We are honest. We are transparent.

At Lakefront, we are ambitious, pioneering and resilient. The thing that underpins all of this? We hold our principles above profits. This is ***making it happen the right way.***

Promise: We act ethically and with integrity in everything we do.[1]

- We recognize the harm that bribery and corruption cause, often to the most vulnerable people in society. Therefore, **our position is simple**.
    - We do not offer, give, demand or accept any financial or other favor to, or from, any person in order to obtain an unfair advantage. It does not matter what the situation is, who is involved, or the value.
    - We do not ask third parties to do this on our behalf and do not work with third parties that do not apply the same standards.
    - When we work with external partners such as Healthcare Professionals, Patient Organizations, Patients or Government Officials, it is for the purpose of achieving better outcomes for Patients.
    - We will never attempt to unduly influence any of our external partners and we only contract their services where there is a genuine and legitimate need to do so.
    - We only pay Fair Market Value for such services.
- We do not participate in political lobbying through the provision of direct or indirect funding to political institutions / organizations.
- We are ambitious, innovative and resilient and we hold our principles above profits.
- We understand that conflicts of interest can be damaging to the company and also to our own reputations. Therefore, we exercise good judgment to avoid situations where there may be, or even appear to be, an actual or potential conflict between our personal interests and the interests of Lakefront.
- Where it is not possible to avoid a potential conflict, we will disclose this to our manager or to our Compliance & Ethics business partner so that together, we can discuss how it can be managed appropriately and transparently.

[1] Need more guidance? Access the Lakefront Corporate Governance page here - Access the Lakefront Anti-Bribery and Anti-Corruption Policy here - Access the Lakefront Declarations of Interest Policy and Guidance here

Chapter 3 - We are responsible corporate citizens. Our actions are thoughtful and considered.

Making it happen the right way *is not always easy; sometimes the hardest thing and the right thing are the same.*

Promise: We are thoughtful, responsible, and hold each other accountable.[2]

- We understand that our stakeholders' trust is hard earned but easily lost. Therefore, we commit to exercising good judgement and performing our responsibilities honestly, ethically and to high quality standards.
    - We communicate with care because we understand that the way in which we say something is as important as what we say.
    - We are honest and transparent in all our interactions, and we never share information that is misleading, unbalanced or inaccurate.
    - We commit to providing materially accurate and reliable information in relation to our financial position and our operations.
    - We use emerging technology to help us to innovate and we ensure we use it ethically and in a way that respects all the principles of this Code.
    - Our books, records and financial statements are kept up to date and we make any disclosures required of us in a timely manner and present them in a way that is easy to understand.
- We comply with all laws, regulations and ethical codes that apply to us.
    - We comply with laws and regulations in relation to market abuse and insider trading and comply with the Lakefront Dealing Code.
    - We are committed to upholding the health, safety and wellbeing of our employees.
    - We seek to protect Lakefront assets, we understand that theft, carelessness and waste have a direct impact on Lakefront's financial performance and so we only use such assets and services for the benefit of Lakefront's legitimate business purposes and not for personal benefit or the benefit of anyone else.
    - We understand that our stakeholders trust and rely on us to process their data in a respectful and compliant way and to protect their privacy and confidential information. We therefore comply with all applicable privacy laws and regulations, including GDPR.
    - We promote our products only in accordance with the approved product label ("on-label") and only once we have received the necessary regulatory authorizations ("post-licence").
- We are a responsible and sustainable business. We are committed to minimizing any negative environmental impact our operations may have and to actively reduce our environmental footprint.
    - Environment, health and safety (EHS) is everyone's responsibility, and we must actively participate in our EHS programs and share our ambition to continuously improve.

[2] Need more guidance? Access our Dealing Code here

Chapter 4 - We show courage in the face of adversity. We speak up for what is right, and we listen when someone speaks.

At Lakefront, we understand that in order for our organization to thrive, we must create an environment in which we all feel safe and empowered to raise our voices if we see something that goes against our values.

---

*At Lakefront, our culture is to embrace diversity and to create a space where it is safe to **speak up**, knowing that we will be listened to, even when this might be difficult. Although regulations and procedures can tell us what to do, in the end it is our own internal compass that directs us towards what feels right, and is the right thing to do.*

Building trusting relationships with our colleagues and partners is vital for our progress - that means recognizing and learning from failures and success.

Promise: We nurture an environment in which every voice is heard.

- Regardless of seniority, role or position, at Lakefront **every opinion matters**. Each idea that goes unshared is a lost opportunity and so, we push ourselves and encourage each other to **have an open mind**, **be curious** and **challenge the status quo**.
- We understand that real innovation comes from a diverse range of ideas and so, at Lakefront, we speak our minds and make it safe for everyone to use their voices.
- We understand that the leaders of our organization have an important part to play in building a culture in which everyone feels safe to use their voice. Our leaders must listen up and take action when our teams speak up.

Promise: We will help and encourage those brave Lakefront employees and partners who speak up when they see something wrong. We will ensure they are protected. And we will celebrate their bravery.[3]

- We each have a responsibility to speak up when we see something wrong. Therefore, our process for reporting a concern is straightforward, clear and easy to access.
- All reports are taken seriously and managed in accordance with our robust investigation procedures.
- Where possible, anyone reporting a concern will be kept updated and the matter will be dealt with confidentially, promptly and fairly.
- We encourage anyone reporting a concern to let us know who they are as this will help us investigate the matter. However, if requested, the details of anyone reporting a concern can be kept anonymous.
- We do not tolerate retaliation in any form, against anyone who makes a legitimate report.
- We are proud of anyone who speaks up for what is right and wherever we can, we will recognize their bravery.

[3] Need more guidance? Access our external reporting service Speeki here

Chapter 5 - We believe that there is strength in individuality and diversity. We do not tolerate harassment or discrimination of any kind.

*We **stand up** for those who are marginalized, disenfranchised or persecuted. Even if this doesn't impact us personally, at Lakefront we understand that one person's fight for **equality**, is everyone's fight.*

Promise: We foster a diverse and inclusive organization and protect each other against all forms of harassment and discrimination.[4]

- We actively encourage diversity in all its forms as we know that it brings different perspectives which improve innovation and decision making.
- We will grow a diverse and inclusive workplace, where people can be their whole and best selves and in which every one of us feels a sense of belonging and community.
- At Lakefront, our position is simple; we treat one another as we'd wish to be treated, with equity, respect and dignity, enabling everyone to contribute fully and enjoy equal opportunities within the company.
- Whether in relation to race, gender or gender identity, sexual orientation, age, nationality, religion, disability, appearance, political opinion, national extraction, social origin, trade union membership, or anything else, we stand united against all forms of harassment or discrimination.
- The right to freedom from discrimination and harassment extends to all of us. We take care to select vendors and suppliers with whom we work to ensure that they also uphold these standards.
- We understand that our obligations go further than not discriminating ourselves; if we witness harassment or discrimination, **we speak up**.

[4] Need more guidance? Access our Anti-Harassment and Discrimination Policy here

Chapter 6 - As a member of the UN Global Compact, we uphold high standards throughout our supply chain.

*We want to be **confident** that we can work with partners and suppliers who **share our values** and act responsibly.*

Promise: We uphold high standards throughout our supply chain.

- We are a member of the UN Global Compact and establish practices to uphold those principles through our supply chain, wherever in the world we operate.
    - We comply with all laws, regulations and internationally proclaimed principles in relation to human rights and modern slavery.
    - We will not be complicit in any human rights abuses, no matter where in the world we operate.
    - We uphold freedom of association for our employees and maintain a right to collective bargaining.
    - We will work with our supply chain to eliminate any forced, compulsory and child labor.
- We work closely with key partners through collaborative relationships, and we will hold our suppliers to the same standards we apply to ourselves.
    - We carefully select partners and suppliers through robust processes, conducting appropriate due diligence so we can be confident in the ethical operation of our supply chain.
    - We expect suppliers to sign up to, and comply with, our Supplier Code of Conduct.
    - We will appropriately oversee all activities in our supply chain and resolve any issues that arise in a responsible manner.

Chapter 7 - We feel empowered to make the right choices and we therefore hold ourselves accountable for our actions.

When I close my laptop at the end of the day, I feel a sense of both calm and pride. I know that if asked, I could answer any question on how or why I had done or not done something, with clarity and confidence.

Promise: Whether we get it right or wrong, we are accountable for what we do.

- We each have a responsibility to exercise good judgment and we commit to making it happen the right way.
- With that said, we understand that sometimes failure will be a part of our journey and that our failures as well as our successes, contribute to our growth.
- Therefore, we take responsibility for our actions and own our mistakes. We acknowledge that if we chose to act in a way which conflicts with the principles of this Code, we will have to face the consequences.
- We understand that this Code applies to us all, in full. Regardless of seniority, position or rank, our Code will be applied consistently to every single member of the Lakefront team.

Call to Action

As a member of the Lakefront team, I am here to make things happen together with my colleagues but only in the **right way**. I will keep this Code close to hand, to guide me if I am ever unsure.

If I can't find the answer I need in this Code, I will **ask**.

I understand that there are other policies, procedures and guidelines that are relevant to my role. I will **read and apply** them because I understand that they exist to protect me, my colleagues, the company **and the patients and societies we serve**.

It is important to me that people trust my integrity and so I will disclose any potential or actual **conflicts of interest**.

I will show courage, even when it is difficult to do so and will always **listen** and **speak up** if I see something wrong.