

External Travel and Expenses Policy
(Healthcare stakeholders)

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SCOPE

This global External Travel and Expenses Policy (this "**Policy**") applies in **all** interactions with external healthcare stakeholders (e.g., healthcare professionals, patient organization representatives, patients and their caregivers), where any travel, expenses, or other hospitality is reimbursed or otherwise provided by Camurus, to an external healthcare stakeholder.

The scope of the policy includes, but is not limited to, those situations where a healthcare stakeholder provides a consultancy service to Camurus, or receives sponsorship support from Camurus to attend professional, promotional, scientific, educational events, congresses, conferences and similar events, including but not limited to advisory boards, investigator meetings and visits to research or manufacturing facilities, or where Camurus staff meets with a healthcare stakeholder during the course of interactions in the field, or in connection to congresses and other events.

OVERVIEW

Camurus works in collaboration with various healthcare stakeholders to drive innovation, exchange knowledge and information in medicine, and improve health and quality of life for patients. While such collaborations essentially contribute to enhanced patient care, at the same time, we recognize that interactions between pharmaceutical companies and healthcare stakeholders are particularly sensitive to conflicts of interest that may be detrimental. The provision of hospitality, including meals, travel and accommodation, to recipients in the healthcare and public sectors is strictly regulated. Depending on the nature of such contributions and the jurisdiction involved, it may also be improper from an anti-corruption perspective.

The aim of the Policy is to ensure that any travel, expenses, or other hospitality, that is re-imbursed or otherwise provided to a healthcare stakeholder, is made in full compliance with all applicable laws, regulations, and industry codes, and is cost-efficient, safe and environmentally friendly.

In addition to this Policy, additional provisions and requirements may apply, that may be adapted as imposed from time to time, as set forth in the relevant agreement between Camurus and the healthcare stakeholder, and/or as communicated by other means through Camurus (for example in connection to the invitation or registration for an event).

This Policy supplements and shall be applied in conjunction to the more general provisions concerning hospitality, which is stipulated in the Camurus global Healthcare Interactions Policy [1].

Please also note that, in case of conflict between Camurus global versus applicable local provisions, the strictest provision shall prevail. In addition, certain countries have laws, regulations and codes obligating Camurus and/or healthcare stakeholders practicing in those areas to abide by different travel, expense or hospitality guidelines. Where stricter than this Policy, those laws, regulations, and codes must be followed.

POLICY

Hospitality – general provisions

Hospitality extended in connection with interactions and events must be limited to travel, meals, accommodation, and genuine registration fees. These must comply with any local applicable

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thresholds and industry code requirements that may prohibit, for example, meals above a certain cost limit or sponsorship to attend a congress.

Hospitality and attendance must only be extended to persons who qualify as participants in their own right, i.e., no spouse, partner, family member or other guest shall accompany the healthcare stakeholder. Unless in exceptional cases of established health needs (e.g., disability or injury), and subject to Camurus' approval, hospitality may be provided to another person.

All forms of hospitality offered must be reasonable in level and strictly limited to the main purpose of the event, or other professional interaction.

Hospitality must not include sponsoring or organizing entertainment (e.g., sporting or leisure).

Travel bookings

Travel bookings shall, as a rule, be made by Camurus staff (or by assigned third parties if instructed by Camurus), and through a Camurus approved travel agency. Where local operating practice or stakeholder preference makes direct booking impractical, exception approval is required (see section "Policy Compliance" further below).

Where possible, costs shall be paid by Camurus directly to the service provider (e.g., travel agency, restaurant etc.), with no direct travel and expense reimbursement to the healthcare stakeholder. However, reimbursement for costs paid by the healthcare stakeholder directly are generally permitted for short journeys by taxi, rideshare, public transportation, parking etc. These must be supported by appropriate documentation (receipts etc.), be justified, and reflected in the relevant contractual arrangement.

The permitted routing is: work/home → Camurus engagement/event → work/home.

The length of the journey should be tailored to the time required for the professional engagement/event, not to represent any additional benefit for the healthcare stakeholder. Extension of travel bookings for non-business reasons (e.g., arriving earlier or delaying departure, or stop-overs), beyond what is justified in relation to the attendance in a professional event or service performed, is not acceptable. As a general rule, in case overnight stay is required at the location of the event (e.g., the event starts in the morning or ends in the evening) arrival in or departure from the event destination shall be limited to up to 12 hours before and after the event, respectively, except for time required to participate in assigned preparatory work (e.g., a speaker briefing, as scheduled by Camurus prior to the actual performance of the event), and by taking into account the availability of flight/train connections etc. at the destination.

Camurus does not facilitate modifications of bookings for personal reasons (e.g. change of seat, upgrade, or flight time), and Camurus will not pay for any costs or fees associated thereby.

Flights

For healthcare stakeholders providing consultancy services to Camurus (speakers, advisory board participation etc.), flight bookings may as an exception be made in business class, if justified by length of travel and travel schedule. This is subject to exception approval (see section "Policy Compliance" further below).

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Rail

Travel should be booked as fixed-date tickets, where possible. For healthcare stakeholders providing consultancy services to Camurus (speakers advisory board participation etc.), first class train tickets are permitted.

Ground transportation

Taxi, rideshare, bus, train tickets, parking can be purchased and re-imbursed subject to valid receipt and as reflected in the relevant agreement. Non-justified expenses will not be reimbursed. Camurus can reimburse for the use of a rental vehicle, when it is cost effective and the only practical option, and is approved in advance

Personal Car

Private car for travel to the event (conference venue etc.) is only acceptable if this is more justifiable than other public transportation alternatives, and for shorter travel distances (in general up to 320 km/200 miles), and provided such arrangement is agreed in advance with Camurus in writing.

Healthcare stakeholders will be reimbursed for personal car mileage used during business travel at legal mileage reimbursement rate (as per rates defined per country). Personal mileage reimbursement is intended to cover all costs related to operation of the vehicle including service, maintenance (gas, oil), insurance and depreciation. The cost of parking and tolls will also be reimbursed, with proper receipts.

Hotel accommodation

Accommodation is permitted if justified by the timings of the event and the distance required to travel to it. Accommodation must only be covered for nights in relation to the event, in single rooms, and at hotels selected or pre-approved by Camurus. The standard of the hotel should embrace normal business standard regarding quality, safety and comfort (in general corresponding to 3- or 4-star classification), and shall not be renowned for spas, entertainment, leisure, sport facilities, be a resort, luxury, extravagant or 5-star accommodation. Additional charges for upgraded rooms to executive floors, concierge levels or suites will not be reimbursed. In-room charges for mini-bar, movies/games, personal items (e.g. toiletries, magazines, aspirin and other medicines, etc.) and health club/fitness center access fee charges will not be reimbursed. Room service is permitted subject to the conditions below.

Meals and beverages

Only reasonable and modest expenses must be reimbursed or paid for, up to the cost level agreed in advance with Camurus in writing, and subject to the applicable Camurus policy or other relevant provisions.

Regional thresholds:

- Europe applies the threshold limits issued by the European Federation of Pharmaceutical Industries and Associations (EFPIA) on their webpage as the maximum permitted cost [2]

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- Australia: Camurus applies the threshold limits issued by Medicines Australia, as the maximum permitted cost [3]
- United States: Camurus applies the threshold limits set out in the applicable local policy, which reflects the principles of the Pharmaceutical Research and Manufacturers Association (PhRMA) Code on Interactions with Healthcare Professionals [4], [5]
- United Kingdom: Camurus provisions for meals and beverages, as outlined in the local SOP, also apply [6]

For meals and beverages consumed abroad, the threshold limit set for the country where the meal is consumed applies as the maximum permitted cost — commonly referred to as the "EFPIA host country principle" [2]. This principle also applies if the meal is consumed ex-EFPIA, ex-US and ex-Australia, however in the absence of a local defined threshold limit in the country where the meal is consumed, the most restrictive threshold limit applicable among the countries of the attendees, shall apply.

The limits cover the total amount for food and beverages. Unless otherwise stated (as is the case in e.g. Australia [3] and the United States [4]), totals include VAT/tax and gratuities/tips.

Note: The monetary cap for meals and dinners, and the alcohol limits below, apply to the combined total of all food and beverages consumed during an evening as a whole (e.g., if a dinner is held at a restaurant, followed by beverages provided at the hotel bar, both amounts are counted together). The most senior Camurus employee present must pay for the food and beverages and account for any hospitality previously provided during the evening to ensure compliance with these limits.

Alcohol

Alcohol is restricted to moderate amounts and must only be provided in connection with dinner or as part of meal refreshments at an evening reception. The total amount of alcohol is limited to a maximum of 3 alcoholic beverages per person for an evening as a whole (e.g., 3 glasses of wine, 3 beers, or 3 drinks). Of these, a maximum of 1 alcoholic beverage may be consumed before the meal (as an aperitif) or after the meal, provided that consumption takes place in the same venue as the meal or in a hotel bar. Stand-alone alcohol — i.e., alcohol served without food — is otherwise not permitted.

The caps on the number of alcoholic beverages and food and beverage monetary amounts apply in all situations where Camurus is paying or reimbursing costs. The caps also apply where an external healthcare stakeholder offers to pay the costs if Camurus employees are present.

Non-alcoholic alternatives must always be offered.

Reimbursement for authorized travel-related expenses

Reimbursement for authorized travel-related expenses incurred by the healthcare stakeholder will be made in accordance with the Policy, and as reflected in the relevant agreement, for reasonable, pre-authorized, out-of-pocket expenses, required for performance of consultancy services, or where applicable, to attend as a sponsored participant in legitimate scientific, educational or promotional events. To be eligible for reimbursement, proof of valid receipts shall be provided to Camurus no later than 30 days after the expense.

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The healthcare stakeholder must not be reimbursed for extended or non-business-related stays prior to or after an event/meeting. In addition, Camurus will not reimburse travel, meals or additional lodging costs for spouses or other guests, unless as referenced above, in the exceptional circumstances of established health needs of the healthcare stakeholder.

POLICY COMPLIANCE

This policy applies to all employees of Camurus, in customer facing functions and departments. Any exception to the Policy is subject to approval by Camurus CEO or the Global Head of Compliance/Compliance Officer.

For Camurus employees, violations of this policy may lead to disciplinary actions up to, including termination of employment. It is the responsibility of all Camurus employees to immediately report any suspicion of violation of this policy. Such concerns can be reported through ordinary Line manager reporting, HR, Camurus management, or to a representative of Camurus Legal or Compliance functions.

Reports can also be made through Camurus' whistleblowing system, which facilitate anonymous reporting and follow up. The whistleblowing system is available via Camurus intranet and the corporate website.

Camurus will not tolerate retaliation against anyone for reporting concerns in good faith.

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REFERENCES

1.Camurus Healthcare Interaction Policy https://www.camurus.com/sustainability/governing-documents/ (GUI-0028)

2. EFPIA Code of Practice https://www.efpia.eu/relationships-code/the-efpia-code/

3. Medicines Australia, Hospitality Guidance https://www.medicinesaustralia.com.au/code/about-the-code/code-resource-toolkit/guidance/

4. US Meals, Gifts & Entertainment (Camurus Policy GUI-0031)

5. The Pharmaceutical Research and Manufacturers of America (PhRMA), Code on Interactions with Healthcare Professionals https://www.phrma.org/stem/code-on-interactions-with-health-care-professionals

6. SOP-0125 Camurus Ltd Meetings & Hospitality

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