

IROKO

Code of Conduct



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President's Message

Dear Iroko Colleagues:

In every facet of our business, Iroko is committed to integrity. For each of us, that means conducting ourselves according to high ethical and legal standards. Our Code of Conduct summarizes the industry standards as well as our own policies that guide our actions in each of the jurisdictions where we conduct business.

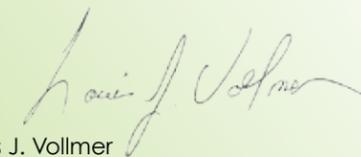
It is the responsibility of every Iroko colleague and agent who engages in the activities described in our Code of Conduct to be knowledgeable about and comply with Iroko's policies. The Company takes violations seriously, so it is important to know the policies and comply accordingly.

As President of Iroko, how we conduct business is of vital importance to me. It is a privilege to work for a company that can have such a tremendous impact on the lives of the patients who use our products. So, operating with the highest degree of integrity with patients as the primary focus of what we do keeps us grounded and in step with the most foundational elements of our Company. Integrity is the cornerstone of all of the decisions we make. Every Iroko colleague is expected to deliver high performance while enabling a culture of trust where everyone feels completely comfortable speaking up and voicing alternative views and opinions.

No matter how we change and grow, the core of who we are, embodied in our values and standards, will remain constant. And those values and standards along with the integrity in all we do will always be the very basis of our success.

Doing well requires that we do right, and I look forward to your strong support of our Code of Conduct.

Sincerely,



Louis J. Vollmer
President,
Iroko Pharmaceuticals, LLC



Our Commitment and Pledge of Integrity

We are all expected to take ownership of compliance and to perform with integrity—that is what we mean when we say “doing the right things, right, every time.” Your personal commitment to performing with integrity is vitally important to Iroko’s success.

We can help ensure that we conduct business to the highest standards by:

- taking responsibility and holding each other accountable;
- raising concerns and asking questions;
- exercising good judgment and making the right decisions even when the decisions are difficult; and
- following Iroko policies in everything we do and everywhere we operate.

Annually, colleagues will be asked to sign a pledge indicating that they are familiar with the provisions of our Code of Conduct and that they pledge to perform their day-to-day responsibilities with integrity.



Our Principles of Conduct: Integrity in the Marketplace

• Our Individual Responsibility

Speak Up

It is important to Iroko that all actual and potential violations of law, policies, or our Code of Conduct are fully evaluated by appropriate personnel. Each Iroko colleague is expected to report any violation as soon as he or she becomes aware of the violation. Many violations of laws that apply to our business carry civil or criminal penalties. Any conduct that you believe to be unlawful or a violation of our Code of Conduct should be reported to your supervisor, to the Legal Department, or to the Iroko Compliance Office. You may choose to identify yourself in the communication or you may make the report anonymously. All employees are required to cooperate fully in any investigation.

Iroko will take measures to ensure confidentiality of communications to the extent possible, and will investigate reports of possible misconduct.

Non-Retaliation Policy
Iroko assures protection against any form of reprisal for reporting actual or suspected violations of law or our Code of Conduct.

• The Iroko Compliance Program

All colleagues are expected to take ownership of compliance and to perform all tasks with integrity. Our policies are ever evolving to take into account updates and changes in the laws, regulations, standards, and codes impacting our industry as well as to incorporate improvements learned over time.

Our Compliance Program incorporates the elements in accordance with the “Compliance Program Guidance for Pharmaceutical Manufacturers” developed by the United States Department of Health and Human Services,

Office of Inspector General (OIG). Below is a brief description of how our Compliance Program embodies each of the seven elements of an effective compliance program:

1. Governance: Involvement and Dedicated Compliance Personnel

Iroko’s Compliance Office is responsible for overseeing all aspects of Iroko’s global compliance program, including implementing Code of Conduct training; developing and conducting training on key areas of legal risk; developing and implementing monitoring systems; providing channels for employees, suppliers, agents, and customers to report suspected legal and ethics violations; and reporting compliance and ethics activities and issues as appropriate.

The Executive Director of Compliance leads the Compliance Program and promotes leadership and oversight through the Executive Compliance Committee.

Additional compliance support is provided by Legal, Regulatory, Human Resources, Finance and other functional groups as appropriate.

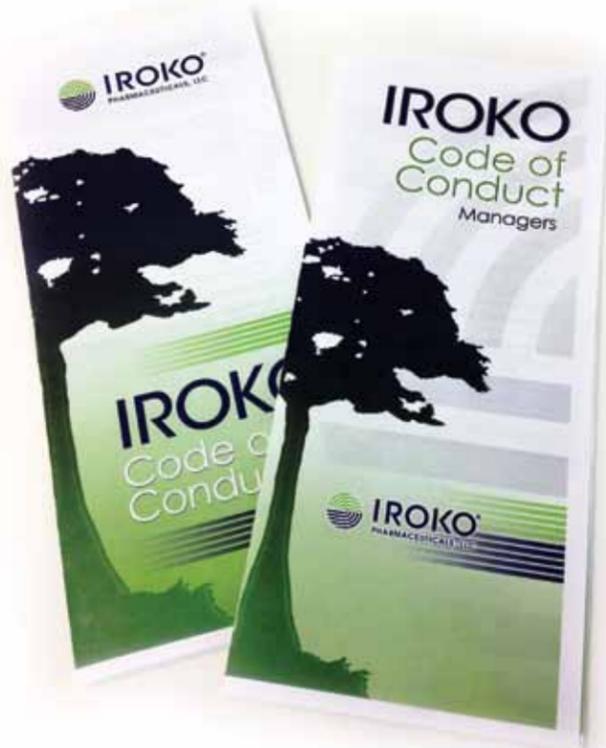
The Compliance Office has exclusive responsibility for investigating, or directing the investigation of, significant potential, suspected or actual violations of law or policy. The Compliance Office may request the assistance of appropriate Iroko personnel in conducting the investigation.

2. Written Policies and Procedures

Iroko has implemented policies and procedures that provide colleagues with direction in their day-to-day activities including, but not limited to, our Code of Conduct. Iroko has implemented the Pharmaceutical Research and Manufacturers of America (PhRMA) "Code on Interacting with Healthcare Professionals" (PhRMA Code). Other Iroko policies are available to colleagues worldwide on the Iroko Compliance intranet site (<https://portal.iroko.com>).

3. Effective Training and Communication

Iroko is committed to providing effective training to employees, managers, officers, directors and certain of our agents/consultants on our Compliance Program on an ongoing basis. Training is conducted via a variety of methods including online education and live classroom training.



4. Effective Lines of Communication

Fostering an environment that encourages open communication regarding our Code of Conduct, Company policies, or concerns about suspected improper business practices is important to Iroko and forms a key aspect of our Company culture. Iroko provides multiple channels for raising compliance concerns.

Open Door Policy

The Company has an "Open Door Policy" and encourages colleagues to discuss all issues, concerns, problems and suggestions with their immediate supervisors or other managers without fear of retaliation.

Compliance Helpline

Where available and permitted by law, Iroko's Compliance Helpline allows colleagues to report a concern or to get information or advice anonymously. The Compliance Helpline can be reached by phone or online via the web-reporting tool. This resource is accessible 24 hours a day, 7 days a week, and 365 days a year. The Compliance Helpline is operated by specially trained third party representatives:

Compliance Helpline Number (U.S., Puerto Rico, and Canada): 1-855-IROKO20 (1-855-476-5620)

For colleagues outside the U.S., Puerto Rico, and Canada, dial the following Universal International Freephone Number +800-1777-9999 or dial +1-720-514-4400 for collect call/reverse charges. If using the collect call number, operator assistance may be required and local charges may apply.

Compliance Helpline Web-Reporting Tool

Iroko has chosen an incident reporting system operated by a third party service provider, which is accessible via www.IrokoComplianceHelp.com, to give you a personal 24-hour helpline tool. To make an online report, log on to www.IrokoComplianceHelp.com. Your confidential and anonymous report will instantly and discreetly be forwarded to appropriate personnel in the Legal Department. After submission, the system will provide you with a unique access number and you will be asked to create a personal password. This information will allow you to re-enter your report to anonymously receive and send messages pertaining to your report as well as check the status.

Contact the Iroko Compliance Office Directly

Email: Compliance@iroko.com

Mail: Iroko Compliance Office, Iroko Pharmaceuticals, LLC, One Kew Place, 150 Rouse Blvd, Philadelphia, PA 19112

5. Internal Monitoring and Auditing

Internal monitoring and auditing are vital parts of the Compliance Program. The Compliance Office identifies potential risk areas on which to focus its auditing and monitoring activities. With our monitoring and auditing mechanisms, Iroko is able to verify the efficient operation of its policies and practices, determine where enhancements can be made, and have the capability to detect and prevent deviations before, in certain circumstances, they grow into larger compliance concerns.

6. Enforcement Through Appropriate Discipline and Recognition

Our Code of Conduct puts all colleagues, including Management, on notice that failure to adhere to our compliance standards may have disciplinary consequences, up to and including termination of employment. If an investigation suggests that discipline may be warranted, appropriate action is taken. Likewise, Iroko's practices recognize colleagues for exemplary behaviors that serve as best-in-class examples of Iroko's company values and core commitment to integrity.

7. Prompt Response and Corrective Action for Detected Problems

Our compliance program supports prompt response and corrective action for detected problems as appropriate under the circumstances. It is expected that compliance concerns referred through any of the many communication channels (email, Compliance Helpline, etc.) will be carefully reviewed, thoroughly and thoughtfully investigated in a timely manner, and appropriately resolved. Upon conclusion of an internal investigation, corrective action and preventive measures will be determined and implemented as appropriate.

• Healthcare Laws and Regulatory Requirements

Various laws and regulatory requirements worldwide govern the manufacture, labeling, sale, distribution, government contracting, marketing, and promotion of our Company's products in order to assure their safety and efficacy. Violations of these laws can result in severe penalties to the Company and individual employees. Because Iroko is a global company, the laws and regulatory requirements of one country may apply

to activities in another country. All Iroko employees are expected to comply fully with the laws, regulatory requirements, standards, industry codes and policies applicable to his or her individual role or segment of the business. In the event you should have a question concerning these laws or requirements, you should consult with the Regulatory Affairs Department or the Legal Department.

• Promotional Activities and Interactions with Healthcare Professionals

Regulation of advertising and product promotion directly affects our customer relationships. All employees and contractors must follow Iroko's policies on promotional activities and interactions with healthcare professionals. Iroko's internal policies and procedures are designed to ensure that all promotional materials and communications are accurate, not misleading and are compliant with all applicable medical, legal and regulatory standards.

All interactions with healthcare professionals must be guided by laws, regulations, industry codes, and Iroko's *Policy on Interactions with Healthcare Professionals*.

Gifts and Hospitality. We believe in competing on the merits of our products and services and wish to avoid even the appearance of improper conduct with our customers. The provision of gifts, including services, to customers raises serious questions about conflicts of interest or the appearance of conflicts of interest. Therefore, the giving of gifts is prohibited unless it complies with the specific exceptions described below. We recognize that in certain cultures there may be an occasion when gift-giving is customary and expected. Decisions about these situations must be carefully weighed, and prior written approval must be obtained from the Compliance Office before proceeding.

To Physicians:

Because we wish to safeguard the public's confidence in physicians to make decisions solely on the basis of the best interests of patients, we do not provide gifts or other incentives to the physicians with whom we interact. As part of informing physicians about our products, we may provide occasional educational and practice-related items, as long as they are of nominal value and medically relevant (e.g., medical textbooks and other items that serve a genuine educational function) and permitted within the jurisdiction. Remember that some localities have restrictive policies based on local laws or industry codes regarding gifts to physicians. We may provide occasional meals or hospitality, provided that it is:

- In the course of a bona fide educational or business context;
- An accompaniment to an educational or business event/function;
- Legal;
- Consistent with applicable industry codes;
- Consistent with Company policies and procedures;
- Not likely to be perceived as an attempt to improperly influence business decisions; and
- Not embarrassing to the Company if it were to receive public scrutiny.

Our Policy on Interacting with Healthcare Professionals provides a summary of the guidelines for meals, hospitality, gifts, and promotional items for healthcare professionals. It is important to adhere to that policy. Also, you may consult the Legal Department and/or the Compliance Office for additional guidance.

To Third Party Clinical Investigators:

Iroko may support research studies initiated and conducted by third party investigators

that may use Iroko products or that may relate to analgesia therapies.

The proposed research must contribute to the broader medical community and the principal investigator should plan to publish the research results in a peer-reviewed medical journal or present them at a medical conference. Iroko will not support third party research that is unnecessarily duplicative or that Iroko believes is a pretense to promote products.

Funding decisions are not based on the principal investigator's relationship to Iroko or prescribing habits; nor are payments prefaced on research outcomes. Payments are made to the principal investigator's institution, not the individual principal investigator and the related budget must be reasonable and based on fair market value.

To Customers:

In addition to physicians and researchers, we also interact with other important parties, including wholesalers, distributors and retailers. With respect to customers, only business-related items of nominal value are permitted as gifts and an employee must notify his/her manager before accepting a personal gift from a current or potential vendor, contractor or client if the value exceeds \$100.00. Moreover, employees should refrain from giving gifts to customers; if permitted and if approved by the President, the gift should not exceed \$100.00 in value. For additional assistance and guidance, please consult with the Legal Department and/or the Compliance Office.

Monitoring the Safety, Performance and Quality of Our Products

We all have a role to play to help Iroko deliver on its commitment to improve human health. One of your most important responsibilities is to inform the Company of any adverse experiences (AE) or product quality complaints. We are all required to report to Medical Affairs any AE that may be associated with the use of our products. Immediately or at the latest, within 24 hours of becoming aware of an AE, information must be reported, in accordance with Company policies, by faxing a report to +1-877-746-8937 or by calling +1-877-757-0676. Product quality complaints may also be reported by calling 1-877-757-0676.



Our Pledge to Each Other: Integrity in the Workplace

• Promote Equal Opportunity in Employment

Iroko promotes diversity and equal opportunity in employment. Each of us is responsible for maintaining a positive work environment and ensuring that all individuals are treated with respect and dignity. Our employment-related decisions must be based upon an individual's skills, qualifications, and job performance. We do not allow decisions to be made based on any factors that are discriminatory and prohibited by law – including in the United States for example, race, color, sex, age, disability, veteran status, religion, national origin, ancestry, sexual orientation, or citizenship status.

• Prohibition on Discrimination or Harassment

Iroko does not tolerate any form of harassment, which includes verbal or physical behavior that denigrates or shows hostility or aversion toward an individual because of his/her sex, race, ethnicity, sexual orientation, age, religion or any other legally-protected characteristics, and: (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities.

Harassment is not only unacceptable in Iroko's offices, but also in any other Iroko-related setting such as an Iroko-sponsored event, or when using Iroko's electronic assets (e.g., email, voicemail and Internet). Each of us must avoid engaging in any of this conduct, and if we have knowledge of it or observe it, report it to Human Resources.

Our Pledge to Iroko: Integrity in Protecting Company Assets, Reputation and Goodwill

• Books and Record Keeping

We make decisions based on information recorded at every level of the Company. Incomplete or inaccurate information may lead to poor decisions and negative consequences; for example:

- Improper recording of revenues and expenses leads to misrepresentation of the Company's financial position, and is illegal.
- Incomplete or inaccurate manufacturing documents could jeopardize the supply of a product and violate regulations.

We must record all information honestly and accurately. This includes, but is not limited to, expenses, revenues, research test results, production and quality data and any other corporate information. All financial transactions and payments must be authorized and recorded. Strict compliance with corporate accounting methods is required, as is cooperation with our designated auditors.

Contact the Finance Department with any questions concerning the proper recording of financial transactions.

• Conflicts of Interest

Iroko's expectation of each of us regarding conflicts of interest is straightforward: never let your business dealings on behalf of Iroko be improperly influenced – or even appear to be improperly influenced – by your personal interests. We must always conduct ourselves in a way that avoids actual or apparent conflicts of interest. You should report potential conflicts of interest to your manager, who will work with the Legal Department, Human Resources, and/or the Compliance Office to best handle the situation.

• Confidentiality, Protection of Trade Secrets and Intellectual Property

Information is an important Iroko asset that must be protected. The loss of confidential information can be extremely damaging to our competitive position and reputation. Examples of confidential information include, but are not limited to, pricing, formulations, research results, manufacturing methods, financial data and marketing and sales strategies and plans. Confidential information also includes sensitive information regarding the Company's business, employees, customers, clients and/or business partners. You must never disclose any confidential Company information unless there is a valid business purpose and you receive prior authorization by Management.

Iroko intellectual property consists of any business ideas or information that the Company owns, such as unique products and business methodologies. Each of us is responsible for protecting the confidentiality of Company information and trade secrets, which is vital to protecting Iroko intellectual property.

Any violations of this policy will not be tolerated and Iroko reserves the right to terminate employment and take legal action against employees who disclose confidential information without authorization.

General guidelines for protecting confidential Company information include:

- Not discussing sensitive Company business in public;
- Using password protection on computer files (and not sharing your password with other employees);
- Securing sensitive information in locked files and cabinets;



- Securing sensitive information on laptop computers while traveling;
- Exercising caution when using speakerphones and cellular phones;
- And finally, when you are in doubt about the confidential nature of information, treat it as confidential.

Even after we leave the employment of Iroko, we are obligated to maintain the confidentiality of Company information and return all documents and files (including electronically stored information).

• Acceptable Use of Company Computers and Resources

To best represent Iroko and those we serve, we must demonstrate proper care and use of Iroko assets.

While personal use of Iroko assets is permissible, it should be kept to a minimum and should not interfere with Iroko business or an employee's performance of his or her Iroko responsibilities and should never involve inappropriate, unethical, or illegal content.

Physical Property: Iroko property, including computers and other equipment, cell phones and supplies, must be protected from misuse, damage,

theft or other improper handling. Iroko property is meant for conducting Iroko business and is subject to ongoing monitoring by the Company. If an electronic device containing Company data is lost or stolen, the employee must immediately notify his/her manager and the IT Department. Likewise, other assigned items that are lost or stolen should be reported as soon as possible to his/her manager and the IT Security Officer at 267-546-3456.

Information Technology (IT) Systems: Iroko's IT systems include computers, networking resources, email systems, voice systems, mobile devices and other information processed through Iroko systems. Each of us has a responsibility to protect these systems and the information on them from improper access, damage or theft. Iroko reserves the right to access, review and disclose the contents of any and all electronic, photographic or voice information generated with, or passed through, utilizing Iroko systems, technology and/or resources.



• Protecting Our Image: Social Media

Iroko's relationships with patients, customers, the medical community, and business partners depend on appropriate channels for full discussion and providing accurate information. Using Iroko computers or equipment is strongly discouraged when engaging in social media activities. Even when not using Iroko property, you must never misstate facts about Iroko or make any public posting of confidential or proprietary information related to any aspect of Iroko's business on the Internet. You are prohibited from discussing any Iroko product, business plan, research, strategy, or other business-specific details in any social media forum in a way that could be regarded as advertising or promoting a prescription product or otherwise disclosing non-public information. In addition, you should never give the impression that you are speaking on behalf of Iroko in any personal communication. You should direct all media inquiries to Corporate Communications. You may only speak on behalf of Iroko if you have permission – and any information you provide must be complete, fair, accurate, timely and understandable.

• Protection of Personal Information

We have clear responsibilities to protect personally identifiable information, including sensitive personally identifiable information gathered from employees, consumers, healthcare professionals, clinical trial subjects and patients worldwide. We must make sure we comply with global laws whenever we collect, store, transfer, and use this information. The highest standards of integrity must be applied when handling personally identifiable information. A useful guideline is to always protect it as though your own information were being used.

We may monitor your personal communications for business reasons, to properly review the use of corporate assets, correct technical issues, investigate possible wrongdoing and ensure compliance with applicable laws. Any monitoring will be conducted in compliance with our Internet and email usage policies, and to the extent permitted by applicable law.

If you believe data is being misused or is inadequately protected, please contact the Legal Department and/or the IT Security Officer.

Our Pledge to Customers and Business Partners across the Globe:

Integrity in Business Relationships

• Respect for Fair Business Practices and Competition

We must conduct business – selling and marketing products, interacting with health care professionals, contracting with third parties – in a fair manner. Taking advantage of anyone through, for example, manipulation or misrepresentation of information is not acceptable or tolerated. Iroko competes strongly, but fairly, around the world. We seek to maintain and grow our business through superior products and services – not through any improper or anticompetitive business practices. So each of us must strive to understand and comply with global competition and antitrust laws.

Be mindful that competition and antitrust issues may arise from contacts between Iroko and its competitors, or between Iroko and its suppliers and customers. Never discuss with our competitors issues relating to:

- Prices (for example, do not discuss price scales, pricing methods, chargebacks, promotional and billing terms, margins, or discounts);
- Products (for example, do not discuss marketing plans and strategies);
- Production (for example, do not discuss industrial capacity, logistics, product quality);
- Market division by region, customer or therapeutic field;
- Financial information (for example, do not discuss cost of goods/services or profits, margins); or
- Tenders (for example, do not discuss the intention (or not) to bid for them).

At forums, conferences and other meetings, avoid informal contacts with competitors so that you do not discuss issues that might violate antitrust or competition law. If one or more competitors approach you about such an issue, indicate your unwillingness to continue with the discussion. Do not hesitate to say that you object to the issue having been raised, and to withdraw from the discussion.

Competition and antitrust laws can be very complex. If you are unsure of appropriate business practices, you should consult with the Legal Department.

• Anti-Bribery and Anti-Corruption

Payments to Government Officials

Most countries in which we do business have laws that forbid offering, promising, making, authorizing or providing (directly or indirectly through third parties) any payments, gifts, or anything of value to any government official to influence an official act or to influence a decision to award or retain business.

In the United States, the U.S. Foreign Corrupt Practices Act (FCPA) makes it illegal for employees of U.S. companies to directly or indirectly give anything of value to a non-U.S. government official in order to gain an improper business advantage. The FCPA also makes it illegal to inaccurately record transactions. As a U.S. company, all Iroko directors, officers, employees or third parties must comply with the FCPA, as well as with all local anti-bribery and anti-corruption laws.

Commercial Individuals and Companies

Iroko also prohibits "commercial bribery." Generally, commercial bribery is giving, offering or receiving something of value to or from an individual or entity in exchange for improper commercial conduct. Iroko prohibits any director, officer, employee or third party from directly or indirectly engaging in any form of bribery. No director, officer, employee, or third party should assume that the Company's interest ever requires otherwise.

Facilitation Payments

Facilitation payments—sometimes referred to as "grease" payments—are unofficial payments made to a public official or other person in order to secure or expedite the performance of a routine or necessary action. Iroko prohibits facilitation payments and all Iroko employees and third parties should avoid

making any such payment on behalf of the Company.

• Manage Suppliers, Contractors and Third Parties Diligently

We expect that our suppliers and contractors will conduct all activities on behalf of the Company consistent with our Code of Conduct, and according to their contracts with Iroko. We must be diligent in assuring that these parties live up to their obligations.

In addition, we must be careful to avoid situations involving third parties that may lead to a violation of the law. It is unacceptable for a third party, such as a sales agent, distributor or other representative, to provide or offer to provide any payment or anything of value to anyone on behalf of Iroko in an attempt to acquire or preserve business or obtain an improper advantage. Therefore, all employees should observe the following guidelines:

- Each third party representative should be carefully selected and evaluated before being retained.
- All arrangements and contracts with third parties must be in writing and reviewed and approved by the Legal Department.
- Compensation must be customary and reasonable in relation to the services provided.
- All payments must be properly reflected in Iroko's records, books of account and financial statements.
- No payments may be made in cash to third parties or to bank accounts that are not in the third party's name.

• Hiring Relatives and Friends

We seek to hire employees who can contribute to the Company's success. While we may hire friends of current employees and encourage their referral, we will not, however, show favoritism to candidates who are friends of our employees. We will hire each candidate based on his or her qualifications for the open position. Effective October, 2008, it is Iroko's policy not to hire relatives of any current employee. For the purposes of this Code of Conduct, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage, i.e., parent, spouse, partner, child, sibling, grandchild, grandparent, aunt, uncle, first cousin, stepparent/child, or other relationships which the Company may determine raise similar issues. Any employee with a relative working for Iroko or Phoenix IP Ventures, LLC is required to report this relationship to Human Resources and his/her manager.

• Global Trade Compliance

We may not export or sell products without proper approvals by the Legal Department. In addition, our products must meet the legal requirements of the producing country and the countries to which the products would be exported, as well as certain U.S. requirements. Further, we may not import from or export to countries against which there is a U.S. embargo (e.g., Sudan and Cuba). We may not import from or export to certain individuals or organizations with which contact is prohibited by U.S. government agencies.

Our Pledge to the Communities We Serve: Integrity as a Socially Responsible Corporate Citizen

• Trade Securities Legally

There are strict laws that prohibit the use of insider information when buying, selling or trading publicly traded securities. You must not buy, sell, or trade the securities of companies about which you have insider information – until that information becomes public. Insider information can take many forms, but generally is considered to influence an investor's decision to buy, sell or hold securities in a company. Often, it involves information affecting a company other than Iroko, but which you learn about as an Iroko employee. Because insider information is extremely valuable, handle it just like you would handle other confidential information: don't discuss it with family, friends or anyone else; don't talk about it in public places; don't fax it to unattended machines; don't email it to general information broadcast codes; and don't tell others at Iroko unless they must know for business reasons.

• Human Subject Protection in Clinical Research

Clinical trials determine the safety and efficacy of our products in people who volunteer to participate in our studies. It is, therefore, crucial that we conduct these trials with the utmost regard for the health and safety of participants while furthering the interests of science and society.

Iroko is committed to ensuring the safety of the patients and volunteers who take part in our clinical trials, and to upholding the highest ethical, scientific and clinical standards in all of our research initiatives worldwide. All Iroko-sponsored clinical studies are designed and conducted in accordance with applicable laws and regulations as well as recognized medical and ethical standards. Our policies and procedures are intended to ensure Iroko's respect for the health, well-being and safety of research participants as well as for the culture, laws and regulations of the countries in which studies are conducted. Our interventional trials, including those done by Iroko or by external clinical research organizations for Iroko, follow globally recognized principles of international ethics and guidelines for research involving human subjects. These trials are prospectively reviewed by a qualified Institutional Review Board or Independent Ethics Committee. Some of our trials may use independent review of safety data in addition to internal reviews by our research colleagues to help ensure patient safety. In addition, in all research endeavors sponsored by Iroko, Iroko colleagues and those working on behalf of Iroko shall refrain from inappropriately influencing the results and conclusions published from such research.

Information about specific Iroko-sponsored patient trials is available on <http://www.ClinicalTrials.gov>, a publicly available study registry and results database maintained by the U.S. National Institutes of Health.

• Involvement in Political and Public Life

Good corporate citizenship requires that we do not unfairly or illegally influence the political process in the communities in which we operate. Due to the complexity and diversity of laws and regulations governing corporate political activities, political contributions and other related activities on a company level may only be undertaken with the prior approval of the Legal Department.

As private citizens, we may participate in the political process, including contributing to candidates or parties of our choice. However, we may not use Company time, property or resources for our personal political activities.

• Philanthropy and Community Investment

Iroko provides charitable donations, sponsorships and contributions for educational, humanitarian and social projects. We are proud of our history of giving back to the communities we serve and of being a socially responsible corporation. Nonetheless, all charitable contributions must be transparent and paid to not-for-profit organizations whose charitable goals are compatible with Iroko's policies. Before you use Iroko funds to make a monetary charitable contribution; donate to a charitable organization on behalf of Iroko; or otherwise donate or allow the use of Iroko assets by or for such an organization, you must obtain written approval from the Legal Department and the Finance Department.



Raising Compliance Concerns

Iroko will not tolerate retaliation against any employee who raises a business practices or compliance issue. Any employee who raises such an issue will be protected from retaliation. This protection extends to anyone giving information in relation to an investigation. However, Iroko reserves the right to discipline anyone who knowingly makes a false accusation, provides false information to Iroko or has acted improperly.

When you contact the Compliance Office or the Iroko Helpline to raise an issue, you may remain anonymous, although you are encouraged to identify yourself. Should you choose to identify yourself, every reasonable effort will be made to keep your identity confidential in a manner consistent with conducting a thorough and fair investigation as may be required under the law. To assist the Compliance Office in maintaining confidentiality, however, it is imperative that you practice discretion with colleagues or coworkers.





Compliance Helpline

(U.S., Puerto Rico, and Canada):
1-855-IROKO2Ø (1-855-476-5620)

www.IrokoComplianceHelp.com

(International toll-free):
+800-1777-9999

Contact the Iroko Compliance Office

Email: Compliance@Iroko.com

IT/Security Officer

267-546-3456

**Clinical Research and
Medical Affairs**

Chief Medical Officer
267-546-3048

Corporate Communications

CorporateCommunications@iroko.com

