

MAYNE PHARMA GROUP LIMITED

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

1. PURPOSE

This global policy outlines the principles that inform and guide business transactions everywhere Mayne Pharma does business. **We apply a “zero tolerance” approach to acts of bribery or corruption.**

2. SCOPE

This policy applies to all Mayne Pharma directors, officers, and employees (**Employees**) engaged in business transactions, at any level, on behalf of Mayne Pharma Group Limited or any of its fully owned or controlled subsidiaries (**Mayne Pharma**).

3. POLICY STATEMENT

Mayne Pharma prohibits all forms of bribery and corrupt conduct, whether involving a government official, an individual or another company, in accordance with applicable laws and regulations. Mayne Pharma’s prohibition applies to both direct and indirect bribery and corrupt conduct. Consequently, engaging a third-party vendor to engage in prohibited behaviour will violate this policy.

Our “zero tolerance” approach means that Mayne Pharma will investigate and terminate any Employee that:

- Has engaged in bribery or corruption; or
- Has/had knowledge about ongoing bribery or corruption and does/did not report it.

All Employees entrusted with conducting business on behalf of the Company must be aware of all applicable laws that govern their activities. Refer any questions or concerns to the Legal or Compliance Teams for guidance. Among the anti-bribery laws that apply to Mayne Pharma’s business dealings are the anti-bribery and corruption legislation contained in the Australian Commonwealth Criminal Code Act and the US Foreign Corrupt Practices Act. Other local anti-bribery and corruption laws may apply.

The term “bribe” has been consistently defined (including in Australia and the US) as “anything of value” provided, accepted, requested, or offered directly or indirectly to influence individuals to act corruptly, or in violation of their official duties, in exchange for favourable treatment or other advantage.

The term “anything of value” can mean cash, cash equivalents (like gift cards), loans, access to entertainment, employment opportunities, charitable donations, votes, services, travel, and meals among any number of other possibilities.

The term “government official” is broadly defined as anyone who is employed by a government, or quasi-government entity. For example, a physician or nurse employed by a public hospital would likely be considered a government official.

4. RESPONSIBILITY

All Employees must:

- Be familiar with applicable anti-bribery and corruption legislative requirements in the jurisdictions where you are conducting business on behalf of Mayne Pharma.
- Seek help from the Legal or Compliance team if you are unsure about specific anti-bribery and anti-corruption requirements, including any questions related to transactions (no matter the size).

- Accurately and completely record financial transactions in Mayne Pharma's accounting systems, consistent with applicable Finance policies, and maintain all required documentation support.
- Report any known or suspected breaches of this policy to the Compliance or Legal Teams. Anyone who feels uncomfortable with this option can utilise the Whistleblower Hotline, which can be accessed globally online at <https://maynepharma.ethicaladvocate.com>, or by telephone on 1-866-852-5713 (from the US) or 1800 312 813 (from Australia).

The Compliance Team must:

- Maintain an Anti-Bribery and Anti-Corruption Compliance Program.
- Provide guidance to Mayne Pharma colleagues, as necessary.
- Notify the Legal Team of any known violations of this policy.
- Manage the investigation of Anti-Bribery or Anti-Corruption issues, including those submitted through the Whistleblower Hotline.

The Legal Team must:

- Provide legal advice and guidance to Mayne Pharma colleagues, as necessary.
- Support and counsel the investigation of Anti-Bribery or Anti-Corruption issues, including those submitted through the Whistleblower Hotline.

5. REFERENCES AND RELATED DOCUMENTS

Mayne Pharma Group Business Code of Conduct
GLO.POL.LEG.0002 – Misconduct and Whistleblowing Policy