



You deserve tomorrow.

Mayne Pharma Group

Business Code of Conduct

July 2023





CONTENTS

OUR CODE.....	3
OUR VALUES	3
Passion	3
Innovation	3
Agility.....	3
Integrity.....	3
Accountability	3
Empowerment.....	3
OUR COMMITMENT	3
OUR SHARED RESPONSIBILITIES	4
Compliance with the Code	4
Raising Concerns	4
Confidentiality and Anti-Retaliation.....	4
THE WORKPLACE	5
Responsibility of People Managers	5
Safety.....	5
Fair Treatment.....	5
Drugs and Alcohol	6
Wellbeing	6
Environment.....	6
Conduct Outside the Workplace	6
Training and Development.....	6
BUSINESS INTEGRITY	6
Best Interest	6
Business and Financial Records.....	6
Company Assets.....	7
Use of Company Communication Systems.....	7
Intellectual Property (IP)	8
Confidentiality and Use of Information.....	8
Insider Trading.....	8
Conflicts of Interest.....	8
Gifts and Favours.....	9
Data Protection and Privacy.....	9
DEALING WITH OTHERS	9
The Spirit of the Law	9
Promoting Our Products	9
Dealing with Healthcare Professionals.....	10
Dealing with Governments.....	10
Bribes.....	10
Money laundering	10
Competition Laws.....	10
Third Party and Supplier Relationships	11
Communicating with the ASX or our Shareholders.....	11
Media Inquiries, Public Comment and Social Media.....	12

OUR CODE

This Business Code of Conduct (**Code**) applies to Mayne Pharma Group and any of its fully owned subsidiaries (**Mayne Pharma** or the **Company**). All employees, officers and directors (collectively referred to as **Employees**), as well as our third-party contractors, vendors and any other parties acting on our behalf (collectively with Employees referred to as **Representatives**) are responsible for understanding and adhering to the standards described in the Code at all times and seeking help when needed.

Our Code brings together Mayne Pharma's key policy principles and establishes expectations for behaviours that are consistent with our values and in the best interests of the Company.

The Compliance Department is responsible for reviewing the Code at least every 2 years. The Board of Directors is responsible for ratifying the Code.

OUR VALUES

Passion

We show pride, enthusiasm and dedication in everything we do. We are passionate about achieving successful results and about our brands, products, services and people.

Innovation

We are creative in delivering value to our fellow employees, customers, shareholders and community. We strive to connect new ideas with business realities. We anticipate change and capitalize on the many opportunities that arise. Ideas come from everywhere in the Company.

Agility

We anticipate and respond resourcefully to the changing environment and business needs, while aligning our actions with current priorities and objectives.

Integrity

We maintain high ethical standards, demonstrating honesty, respect and fairness in every action that we take. We do the right thing even when no one is looking or will find out.

We honour the rights and beliefs of our fellow employees, customers, shareholders and community. We treat others with a high degree of dignity, equality and trust.

Accountability

We accept our individual and team responsibilities, and we meet our commitments. We take ownership of our decisions, actions and performance. We acknowledge and learn from mistakes and accept responsibility to be part of solutions rather than make excuses.

We will deliver what we promise and not promise what we can't deliver.

Empowerment

We empower our people to take initiative and do what is right. We support and enable their growth and achievement through quality training and coaching. We acknowledge the courage it takes to admit mistakes, to learn from them and to try new ways. We provide genuine and timely recognition for efforts and results.

OUR COMMITMENT

Mayne Pharma upholds a commitment to:

- *Our Shareholders:* We will work to create shareholder value and safeguard their investment through optimising our opportunities and acting responsibly within our business dealings.
- *Our Customers and Business Partners:* We will strive for continuous improvement to produce quality products and services that are delivered when expected with prompt and professional customer service at all times.
- *Our Employees:* We aim to have the right people in the right positions, with business-aligned growth and development opportunities. We will provide a respectful workplace where harassment and discrimination is not tolerated. We strive for a workplace of equity and inclusion at all levels.
- *Our Safety:* We will provide a safe and environmentally conscious workplace and promptly respond to all safety concerns.
- *Our Quality:* We are committed to delivering product which meets or exceeds all required quality standards for the markets in which we operate.
- *Our Community:* We are committed to being active contributors in the communities where we operate.



OUR SHARED RESPONSIBILITIES

Compliance with the Code

We believe that ethical conduct is crucial to business success. We all share in this responsibility.

You must read the Code carefully and refer to it as needed. Employees must also participate in training programs to reinforce provisions of the Code.

As a supplement to the Code, Mayne Pharma provides role-specific policies and procedures to all Employees at the beginning of employment and periodically thereafter.

All Employees must certify annually that they have read the Code and that they will follow the Code, Company policies and applicable laws and regulations.

The Code and the Law

If a provision of the Code conflicts with an applicable law, the law prevails.

We must use good judgment since no set of rules can anticipate every situation. When you face a difficult ethical issue, ask yourself:

- Is it consistent with the Code?
- Is it legal?
- Is it ethical?
- Will it reflect well on me and/or the Company?

If the answer to any of these questions is “no,” don’t do it. If you are ever uncertain how to handle a particular situation, you are responsible for seeking guidance from your supervisor or manager, Human Resources, Compliance or Legal.

Violations of our Code may result in disciplinary action based on the nature and circumstances of violations. This may include termination or disclosure to governmental authorities.

In some circumstances, even a single breach of this Code can result in disciplinary action, up to and including termination of employment. If in doubt, ask your manager, Human Resources, Compliance or Legal before acting.

Raising Concerns

We all have a duty to act and a responsibility to speak up and promptly report known or potential violations of the Code or law, or other valid concerns or questions. Sometimes it may seem easier to keep

silent or look the other way but working with integrity means we must never ignore an issue that needs to be addressed. Not reporting potential or actual unethical or unlawful behaviours is a breach of the Code. Employees and Representatives who raise potential issues help us identify and correct problems promptly and may help prevent further issues.

To raise a concern or report a violation you can:

- Talk to your manager or supervisor. This is often the best person to contact first.
- Speak to Compliance, Legal or Human Resources.
- Contact our independently-operated Ethics and Compliance Hotline online (<https://maynepharma.ethicaladvocate.com>) or by phone (US: 1-866-852-5713, Australia: 1 800 312 813).

Reports must ultimately be forwarded to Legal for appropriate evaluation of the Company’s response.

We investigate all reports of possible misconduct confidentially, determine whether the Code or law has been violated and take appropriate corrective action. If you become involved in an investigation, cooperate fully and answer all questions completely and honestly.

False Accusations

No action will be taken against anyone for raising a concern in good faith. However, it is a Code violation to knowingly make a false accusation, lie to investigators, interfere with or refuse to cooperate with a Code investigation.

Confidentiality and Anti-Retaliation

The ability to discuss ethical and legal issues without fear of retaliation is vital to maintaining the integrity of the Code. We make every effort to maintain, within the limits of the law, the confidentiality of any individual who reports possible misconduct. Moreover, we will not tolerate retaliation against anyone who, in good faith, reports an ethical or legal concern.

If you work with someone who has raised a concern or provided information in an investigation you must continue to treat that person with courtesy and respect. If you believe someone has retaliated against you, report the matter as a potential Code violation.

Reference: Global Misconduct and Whistleblowing Policy for more information.

THE WORKPLACE

Responsibility of People Managers

Employees with supervisory responsibility over others have greater levels of trust and influence. Therefore, they have added responsibilities under the Code to sustain our desired work environment and to lead by example. People Managers must:

- Ensure that the people they supervise understand their responsibilities under the Code and other Company policies.
- Maintain an open and honest environment where Employees feel comfortable asking questions, making suggestions and raising concerns. If approached with a question or concern related to the Code, listen carefully and attentively. Clarify where needed. Answer any questions you can, but do not feel you must give an immediate response. If needed, seek help from your manager, Human Resources, Compliance or Legal.
- Consider conduct in relation to the Code and other Company policies when evaluating Employee performance.
- Never encourage or direct Employees to achieve business results at the expense of ethical conduct or the law.
- Always act to stop violations of the Code or the law by those they supervise.
- Follow up on allegations of wrongdoing and take appropriate corrective action.

Safety

We are committed to providing a safe workplace and making sure that our business decisions do not compromise health and safety. Information on our safety standards, systems, policies and procedures are available on our Intranet.

Everyone's behaviour contributes to an incident and injury free workplace.

Managers are accountable for the implementation of these standards, policies and procedures and for ensuring that supporting systems are in place.

All Employees must report accidents and unsafe practices or conditions to their immediate supervisor.

References: Global Environment, Health, and Safety policy for more information.

Fair Treatment

Our success depends on harnessing the talents of people from various backgrounds, cultures and ideas. Employees have the right to work in an environment free from unlawful discrimination and harassment, including sexual harassment, bullying, intimidation and abuse.

We do not tolerate any form of unlawful workplace discrimination, harassment or bullying. Workplace discrimination can occur in recruitment activities, terms of employment, training opportunities, and selection for transfer, promotion, retrenchment or dismissal. Workplace bullying includes the repeated less favourable treatment of a person by another in the workplace in an unreasonable or inappropriate manner. It includes behaviour that intimidates, offends, degrades or humiliates.

Harassment

Includes slurs, offensive or inappropriate remarks, unwelcome sexual advances, sending sexually explicit or suggestive materials, jokes, electronic communications and other visual, verbal or physical conduct that could create an intimidating, hostile or offensive work environment.

We respect Employees' right to express concerns about the effects of a hostile working environment, even if the conduct in question did not specifically target them. In addition, Employees must report observed instances of unfair treatment or harassment as a potential Code violation.

To promote a respectful working environment, we:

- Prohibit any form of harassment or discrimination based on factors such as race, gender, color, national origin, religion, age, sexual orientation, disability, gender identity, familial status, military or veteran status, genetic information, citizenship status, or any other characteristics protected by law.
- Welcome Employees from a wide range of backgrounds.
- Provide workplace practices and policies that support equitable treatment for all protected attributes.
- Forbid the use of inappropriate or potentially offensive language and behaviours.
- Strictly prohibit the downloading or transmission of messages or materials that

have content that is or could be perceived as threatening, obscene, harassing, unlawful, unethical, unlawfully discriminatory or violent or inappropriate in subject matter, including pornography, sexually explicit or graphic materials or language, ethnic or racial nicknames, slurs or stereotyping.

Reference: In Australia: Fair Treatment Policy (HR004) and, in US: EEO and Harassment Policy (HR-POL-0001).

Drugs and Alcohol

For Employees' safety, wellbeing and productivity, it is essential that we are unimpaired by illegal or certain prescription drugs or alcohol while undertaking any work-related duties.

Employees must not possess or consume illegal drugs in the workplace, including misuse of prescription drugs. Employees must not possess or consume alcohol on Company premises, except at Company-sponsored social events where alcohol consumption is authorised by senior management.

Unless prohibited by law or other valid reason, we have the right to perform drug tests or other assessments on Employees if we have reason to believe this policy is being violated.

Responsible Drinking

The responsible consumption of alcohol at Company sponsored events is acceptable.

Wellbeing

We are committed to protecting the health and wellbeing of our Employees. We acknowledge that many factors can affect job performance and that, at times, Employees may need support beyond the scope of our internal resources.

All permanent Employees and their immediate families have access to the Employee Assistance Program ("EAP"). This program offers confidential, professional and free counselling services to aid with work-related and personal difficulties.

For full details about these services in each location, please refer to your manager or the Human Resources section of the Intranet.

Environment

Mayne Pharma is committed to being a good corporate citizen with proper regard for the environment.

We strive to comply fully with internationally recognised environmental standards and commitments and government requirements.

We support environmental planning and performance auditing, the sustainable use of natural resources, energy and water conservation.

Conduct Outside the Workplace

We expect Employees to uphold a respectful conduct outside the workplace and work hours. Predominantly this includes, but is not limited to:

- Not discriminating, bullying, intimidating or abusing other Employees.
- Obligations as to confidentiality and use of all Company information.
- Not communicating with the media about work- or business-related matters, either verbally or in writing, unless specifically authorised to do so.

Breaches of this conduct may result in disciplinary action even though the conduct was outside the workplace.

Training and Development

We recognise the importance of maintaining and improving our skills. Support is available to enable us to improve our individual and team performances, including internal training and development and financial support for approved external training and development programs.

BUSINESS INTEGRITY

Best Interest

We act for Mayne Pharma's long-term benefit, never for personal gain or as a favour to family or friends.

Business and Financial Records

Shareholders and other stakeholders rely on Mayne Pharma to provide honest and accurate information. It is everyone's responsibility to ensure our business records accurately reflect transactions and events and are properly managed.

Business records, including email, phone and computer records, may become subject to public disclosure during litigation or government investigations. They may also be obtained by outside parties or the media.

Therefore, Employees should be clear, concise, accurate and not misleading when recording any information. For example, we must:

- Confirm that all reports to regulatory agencies are complete, fair, accurate and timely.
- Not alter or falsify any documents or records, including safety, quality, testing, manufacturing and compliance results.
- Not make scientific claims without robust evidence.
- Avoid exaggeration, guesswork, jumping to legal conclusions and derogatory characterisations of people and their motives.
- Properly identify, classify, store and dispose of records.
- Protect our records from unauthorised access or interference.
- Preserve all information relevant to actual or anticipated litigation, regulatory investigation or audit.

Furthermore, our financial reporting must conform with generally accepted accounting principles to meet our legal and regulatory obligations. Consequently, we must:

- Record and classify transactions in the proper accounting period. Do not delay or accelerate recording revenue or expenses to meet budgetary goals.
- Confirm that estimates and accruals are based on good judgement and supported by appropriate documentation.
- Not distort the true nature of any transaction.

Strive for Accuracy

Honest mistakes will occasionally happen. Only intentional or reckless efforts to misrepresent, improperly record transactions or falsify a record are violations of the Code.

Company Assets

We are all responsible for proper use and protection of Company assets. You must **not**:

- Use Company assets for personal benefit.
- Loan, borrow, donate, sell or dispose of any Company property unless authorised.
- Use Company computers or networks to access, receive or transmit materials that are

inappropriate, of a pornographic nature, illegal or may violate our Code.

- Abuse any privileges that you receive in your position.
- Use Company computers or networks in a way that could compromise the security or integrity of Company information or software.
- Forget common sense. For example, the occasional phone call or email from your workplace is acceptable, but excessive personal calls or emails is a misuse of assets.

Company Assets Include

- Financial assets
- Office supplies and equipment
- Computers, networks, and software
- Telephones, mobiles and voicemail
- Internet and email services

Refer to the relevant policy and seek your manager's advance approval for any use of property or services that is not solely for Mayne Pharma's benefit.

Theft of Company assets—whether physical theft such as unauthorised removal of Company product, equipment or information, or theft through intentional misreporting of time or expenses—may result in dismissal and criminal prosecution.

The Company treats workplace theft of assets belonging to other Employees the same way it treats theft of Company assets.

Use of Company Communication Systems

Everything related to Mayne Pharma's email and other electronic communications systems, including all communications and information created, received, saved or sent on Company systems, is Company property.

Any activity using a Company computer system, whether done in or out of the office, is subject to search and monitoring, with or without notice. This applies to any material created, saved or sent using Company email or computer systems, including through third party internet service providers.

Mayne Pharma strictly prohibits downloading or transmitting messages or materials containing content that could be interpreted as offensive, threatening, obscene, harassing, unlawful, unethical, unlawfully discriminatory, violent or inappropriate in subject matter.

Reference: Acceptable Information Technology Use Global Policy

Intellectual Property (IP)

We protect our IP and respect the IP rights of others.

Our IP, including patents, trademarks, copyright and confidential information, are valuable assets. To protect them we must:

- Become familiar with internal procedures relating to IP and brand use.
- Be aware of potential infringement of our IP such as unauthorised use by Employees, Representatives, customers, suppliers and competitors.
- Not allow third parties to use our IP and brands without both proper approval and measures in place.
- Ensure third parties sign confidentiality agreements where appropriate.

Confidentiality and Use of Information

Information is a valuable asset, and we must safeguard the Company's confidential information as well as information entrusted to us by others.

Confidential information is any non-public information that has not been disclosed or made available to the general public and might be of use to competitors or harmful to the owner of the information if disclosed or used for an improper purpose.

It includes everything from contracts and pricing information to marketing plans, business plans, technical specifications, non- public financial reports and employee information.

Examples of Confidential, Non-Public Information

- Financial data
- Employee data
- Strategic and business plans
- Major management or workplace changes
- Inventions and patent applications
- R&D activities
- New product launches
- Mergers and acquisitions
- Technical specifications
- Manufacturing methods
- Pricing and costs
- Supplier relationships

In safeguarding confidential information, we must:

- Not disclose confidential information to anyone outside Mayne Pharma and not

discuss it with Employees who do not have a business need to know the information.

- Be careful where and when we discuss confidential information.
- Not disclose or use any confidential information for personal profit or advantage.
- Only use confidential information entrusted to us by others in accordance with our contractual obligations.

Insider Trading

We, or anyone we associate with, do not trade in Mayne Pharma securities if we, or they, have access to unpublished sensitive information.

Inside information is any information that you know or should reasonably know is not generally available to the public and is likely to have a material effect on our share price or the value of any other securities traded on a stock exchange.

Examples of Inside Information

- Revisions upwards or downwards to sales and earnings forecasts
- Significant restructurings
- Management changes
- Important product development
- Litigation developments

It is illegal to use inside information or to communicate inside information to others who are likely to use the information to trade our shares or any other securities, and such actions may result in prosecution.

There are strict requirements for Employees who wish to buy or sell Company shares, which includes an approval process and specific closed and open window periods for trading. Any Employee looking to buy or sell Company shares must read and follow the Securities Trading Policy.

Reference: Global Securities Trading Policy.

Conflicts of Interest

When conducting Company business, we have a duty to act in the best interest of the Company and to avoid actual or potential conflicts of interest.

A conflict of interest arises when personal, social, financial, political or business activities or relationships could, or could appear to, improperly influence our judgement or the performance of our duties.

Some conflicts of interest are obvious, such as taking payments for awarding business. Others may be less obvious, such as conducting business with a family member even if they offer the best price.

If you think that you could be in a conflict-of-interest situation, you should discuss this with your manager so that it can be dealt with appropriately. When in doubt, it is better to disclose a potential conflict. Failure to disclose an actual conflict of interest may constitute a violation of the Code.

The Company has a process, managed by Legal, where each Employee has an opportunity to identify potential conflicts of interest so that the Company can document and properly handle them. Please contact Legal for details.

Depending on the nature and extent of the conflict, mitigations may include removing the employee as a participant or decision-maker in the relevant activity or disclosing the conflict to an affected third party.

Types of Conflicts

Outside employment, financial interests, speeches and presentations, personal or political relationships

Gifts and Favours

In the course of your work for Mayne Pharma, you or members of your family may be offered gifts, meals, hospitality, entertainment or any other form of favour (collectively referred to as **gifts**) from customers, suppliers, vendors or other business contacts.

We will not accept gifts if:

- Doing so might compromise or be seen to compromise our objectivity.
- They come with the expectation of reciprocation or bind us to ongoing business dealings.
- They make us feel pressured to do or promise to do something in return.
- It may be perceived as excessive in the context of our business dealings or relationship.

We do not allow gifts to influence our business decisions, or cause others to perceive an influence. Employees who are influenced or seek to influence someone can face legal or disciplinary action or dismissal.

The giving and receiving of gifts are acceptable only in accordance with the guidelines above. Gifts that could be valued at \$100 or greater must also:

- Have written pre-approval of an executive manager or delegate.
- Be promptly disclosed via the Gift Register on the Intranet.

Data Protection and Privacy

We comply with privacy and data protection laws that regulate the way we collect, use, maintain, share and delete personal information. Specifically, we must:

- Only collect, use or share personal information as relevant and needed for business purposes, and only as allowed by law.
- Inform individuals why we are collecting their personal information and, where necessary, obtain permission before using or sharing it.
- Keep personal information secure, accurate and up to date.
- Not keep personal information longer than needed, and securely delete or destroy it.

DEALING WITH OTHERS

The Spirit of the Law

Our most fundamental obligation in every place where we do business is to obey the letter and spirit of the law.

Promoting Our Products

To protect public health, governments strictly regulate how pharmaceutical companies can promote and sell products. If you are involved in communicating about our products, you should become familiar with the relevant Company policies and procedures. For example:

- **Content requirements:** Generally, materials must be consistent with approved product information, not misleading, substantiated by scientific evidence, balanced and objective.
- **Internal and external review and approval processes for materials:** In many countries, promotional materials must be submitted to a competent authority or other body before such materials can be used or on first use.
- **Audience limitations:** Most countries do not allow direct to consumer (DTC) advertising.

DTC advertising is permitted in the US, but FDA requires careful calibration to make sure consumers have access to accurate and complete information about products that we choose to advertise through television or other media.

Dealing with Healthcare Professionals

Interacting with healthcare professionals and organisations is an important part of our business, but these interactions are subject to many laws and regulations to help ensure they are appropriate.

If you expect to interact with healthcare professionals or organisations, you should become familiar with relevant Company policies and procedures, as well as any applicable local laws, regulations and codes of conduct.

Sales and marketing of Mayne Pharma products may only be based on quality, price and service, and never based on giving or receiving anything of value, gifts, entertainment or favours.

In addition, some jurisdictions have adopted their own laws restricting how pharmaceutical companies can interact with healthcare professionals and organisations. Some of these laws prohibit or otherwise restrict our ability to provide payments or other items of value, including meals and educational items. Others require that we track and report the value of educational items, meals, or other transfers of value that we provide.

Dealing with Governments

We must maintain the highest ethical standards when dealing with governments. The nature of our business requires that we interact with officials of various governments throughout the world.

It is strictly prohibited to provide a gift, meal or entertainment to any government official or any member of their family.

Any third party interacting with government officials on our behalf must follow the same rules we do and refrain from giving gifts or paying bribes (either directly or through a go-between).

Bribes

A bribe is giving or offering to give anything of value to influence a decision to gain an improper commercial advantage. Bribery and corruption—whether involving government officials or commercial entities—can be direct or indirect

through third parties like agents and distributors. In many countries, bribes include facilitation payments made to public or government officials to provide an incentive to speed up an administrative process, where the payer would have been entitled to the service without making the payment. Mayne Pharma has a zero-tolerance policy towards bribery and corruption.

Anything of Value

This literally means anything which might have value. There is no monetary threshold, and any payment, gift, donation or favour could be construed as a bribe.

We do not offer or accept bribes. We do not offer, pay, seek or accept a personal payment, gift or other favour in return for favourable treatment, to influence a business outcome or to gain any improper business advantage.

We follow the anti-bribery and corruption laws that we are subject to. Many countries we deal with have legislation criminalising bribery. A breach of these is a serious offence and the penalties can be severe including significant individual and corporate fines and even imprisonment. Turning a blind eye to suspicions of bribery and corruption can also result in liability for us and our Employees personally.

Even the appearance of a breach of these laws can have a serious impact on the individual involved and the reputation of the Company.

Money laundering

Money laundering happens when money or assets obtained by criminal means are hidden in legitimate businesses, or when legitimate money is used to support criminal activities.

We conduct appropriate due diligence on entities we deal with to understand their business and background and to determine the origin and destination of money and assets. We do not deal with suspected criminals or proceeds of crime. We report suspicious transactions and incidents of money laundering, and we do not tip off the subject of the investigation.

Prejudicing or obstructing an investigation, or not reporting suspicious activity, can lead to fines, dismissal or imprisonment.

Competition Laws

We compete vigorously and effectively within the

scope of the law.

Most countries in which Mayne Pharma operates have competition laws designed to prohibit a range of practices that restrain trade or restrict free and fair competition, including price-fixing, market sharing or bid rigging conspiracies, or conduct that aims to achieve or maintain a monopoly.

Breaches of competition laws carry potentially serious consequences for the Company and for Employees or other individuals who may be involved. Penalties range from substantial fines to imprisonment in some countries.

The following principles will help safeguard against a violation of competition law:

- Do not discuss, even informally, with competitors or potential competitors price (or any elements of price, including discounts or rebates), production, customers or markets without first consulting Legal.
- When buying a product from a supplier, do not accept any obligation to resell at a particular resale price. Do not impose a resale price on distributors of our products.
- Do not use unethical or illegal methods to gather information about other companies. Do not accept, disclose or use information that was disclosed to you in breach of a confidentiality agreement.
- Limit contact with competitors. Do not take any action that could create an appearance of an improper agreement with competitors.
- Do not discuss competitively sensitive information when participating in industry associations. Leave industry meetings if the discussion turns to inappropriate topics (such as price fixing) and ensure your departure is noted. Consult Legal promptly afterwards.
- When selling to or purchasing from a competitor, only disclose information that is legitimately required to complete the transaction.
- Obtain legal advice on appropriate conduct if we have a substantial market share or could be perceived to be able to raise prices above those seen in a competitive market. Consult with Legal to determine what is a substantial market share depending on jurisdiction.

Third Party and Supplier Relationships

We value our third party and supplier relationships, treating them in the same manner we expect to be treated. Wherever possible, we aim to establish a positive and collaborative relationship with third parties with whom we conduct business, including third party suppliers.

Our procurement processes are fair and equitable, and our expectations, requirements and relevant policies are clearly communicated. In return, we expect our Representatives:

- Act according to the principles of our Code.
- Engage in lawful business practices.
- Uphold ethical employment and management practices.
- Minimise the impact on the environment.
- Provide a safe and healthy workplace.

Procurement decisions should satisfy the following general principles:

- The third party is reputable, competent and qualified to perform the work for which they are being hired.
- The proposed compensation is reasonable.
- The proposed arrangement follows all applicable legal requirements, including engagement through a formal contract.
- There is no conflict of interest that would make engaging the third party inappropriate.
- Third parties representing the Company should be given a copy of the Code.

Communicating with the ASX or our Shareholders

Our Chairman and CEO are responsible for all Mayne Pharma communications. The Chairman is responsible for all communications with the Company's shareholders and the Australian Securities Exchange (ASX) and the CEO is responsible for other internal and external communications by the Company.

As a company listed on the ASX, we must comply with the continuous disclosure obligations of the stock exchange. Responsible persons will make public in a timely, consistent and accurate manner any information or major development related to our business which may reasonably have a material effect on the share price or which a reasonable investor is likely to use in making investment

decisions.

Determining whether an event is material is not always straightforward, which is why Employees must not communicate directly with the public regarding these matters, unless expressly authorised by a responsible person. This applies to all business information, not just confidential information.

Failure to inform the market of material events that may affect the share price could be a legal offence and disclosing inappropriate or inconsistent information may also damage our reputation.

Any public written or verbal communication that can be attributed to Mayne Pharma may amount to a public disclosure. Public disclosures must only be made by authorised spokespersons.

Examples of Public Disclosures

Annual reports, news releases, briefings on profit and business performance, interviews, speeches, articles and website information.

We must not present our personal views as those of Mayne Pharma.

Examples of Media Channels

You must not disclose Company information in person, by phone, via email or on the Internet. The Internet includes websites and social media sites such as Facebook, Twitter, LinkedIn, YouTube, etc., which are accessible to the media.

The CEO and Chairman are the only representatives authorised to communicate with the media. If you are approached by the media, you must not respond with any comments or information and should immediately advise the CEO. Alternatively, you can inform your manager or Human Resources, who should then immediately advise the CEO on your behalf. The only acceptable response to the media, other than ignoring them, is “no comment.”

Social media forums such as blogs, LinkedIn, Twitter and Facebook should be used appropriately. Problems may arise if personal posts appear to be connected with the Company or violate the rights of the Company or other Employees.

Reference: Mayne Pharma’s Communication Policy

Media Inquiries, Public Comment and Social Media

Employees, Representatives, contractors or any third party associated with Mayne Pharma must not disclose any Company information to any media channel (which includes social media), either verbally or in writing, unless expressly authorised to do so.