



**RVL PHARMACEUTICALS, INC.**

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**CODE OF  
CONDUCT**



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# INTRODUCTION

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## Applicability

This Code of Business Conduct and Ethics (“Code”) applies to RVL Pharmaceuticals, Inc. (“Company”), its directors, officers and employees. It is not intended to cover every issue or situation an employee, officer or director may encounter at the Company. Our Code should be used as a guide in addition to other company policies and guidelines.

References in the Code to employees are intended to cover employees, officers and, as applicable, directors.

We expect every employee, officer and director to read and understand our code and its application to the performance of your business responsibilities.

## Purpose

We are committed to maintaining high standards of business conduct and ethics. Our Code reflects the business practices and principles of behavior that support this commitment. Officers, managers and other supervisors are expected to develop in employees a sense of commitment to the spirit, as well as the letter, of the Code. Supervisors are also expected to ensure that all agents and contractors conform to Code standards when working for or on behalf of the Company. Our Code addresses conduct that is particularly important to proper dealings with the people and entities with which we interact.

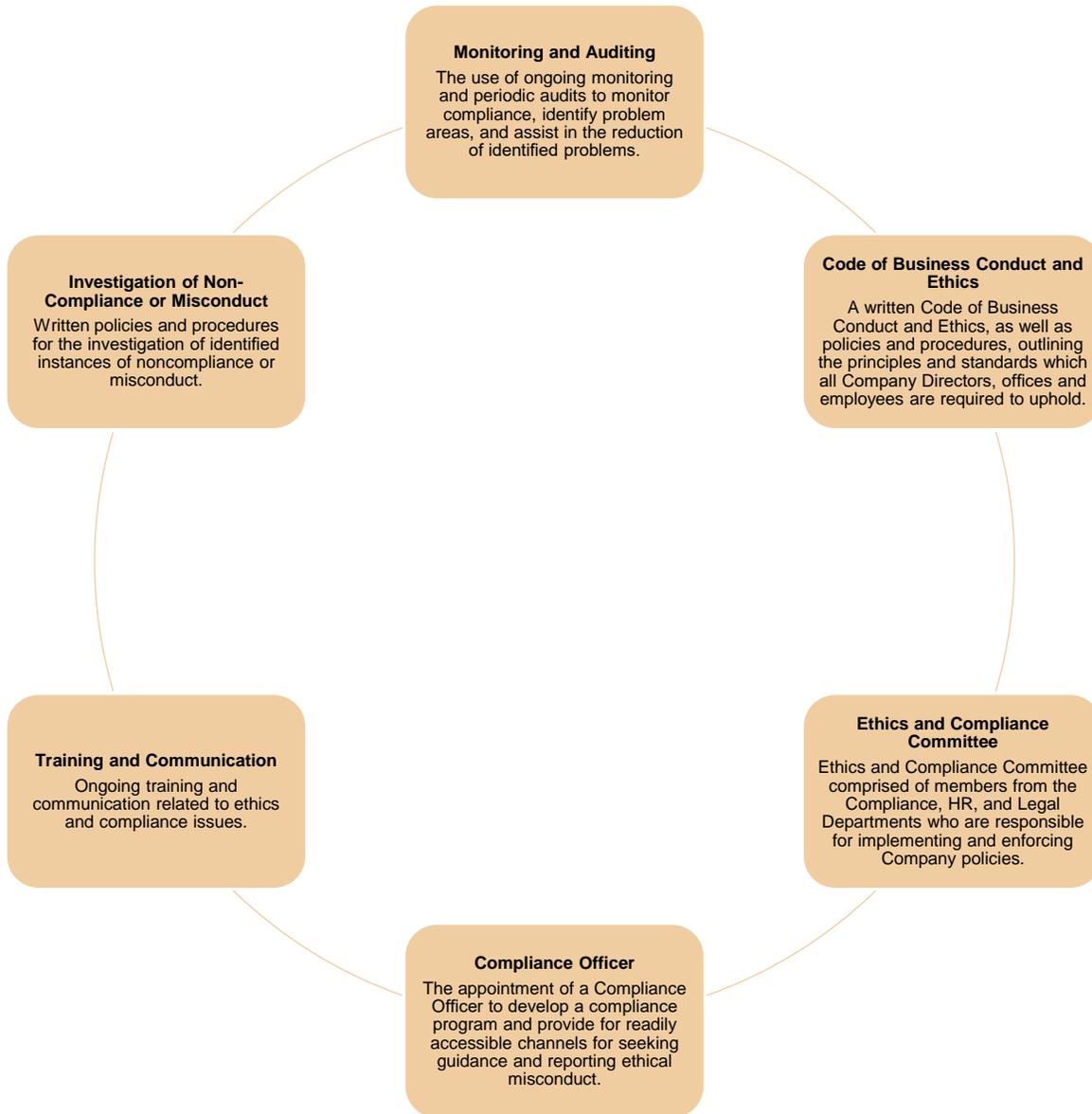
You should not hesitate to ask questions about whether any conduct may violate the Code, voice concerns, or clarify gray areas. In addition, you should be alert to possible violations of the Code by others and report suspected violations, without fear of any form of retaliation.

Any employee who violates the standards in the Code may be subject to disciplinary action, which, depending on the nature of the violation and the history of the employee, may range from a warning or reprimand, up to and including termination of employment and, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution.

## Keep in Mind

It is the responsibility of each employee to apply common sense, together with your own highest personal ethical standards, in making business decisions where there is no stated guideline in the Code.

Components of Our Ethics and Compliance Program



# 1. OUR COMMITMENT TO ETHICS

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Each of us is accountable for abiding by our Code every day. Through this personal commitment, we make business decisions that are in the best interest of the Company and its customers.

## Accountability

Recognizing ethical issues and doing the right thing in all Company business activities is your responsibility. When engaging in business activities for the Company, ask yourself:

- Are my actions ethical?
- Am I taking responsibility?
- If I were testifying in court and asked to explain what I have done, how would I respond?
- Do I speak up when I see, or am aware of, a violation of Company policy?
- Am I being honest and fair?
- Are my actions legal?
- Would another person's input help to evaluate the planned action?
- How would my actions look if they were reported on a newspaper's front page?
- What feels right or wrong about the planned action?

## Expectations of All Employees

As a Company employee, you are expected to comply with both the letter and the spirit of our Code. This means you must understand and comply with all of our policies, laws and regulations that apply to your job, even if you feel pressured to do otherwise.

Our Code also requires you to seek guidance if you have questions or concerns and to cooperate fully in any investigation of suspected violations of the Code that may arise in the course of your employment. Periodically, you may be asked to provide a written certification that you have reviewed and understand the Company's Code of Conduct, comply with its standards, and are not personally aware of any violations of the Code by others.

This certification is your pledge to live up to our Code and its expectations and to promptly raise concerns about any situation that you think may violate our Code. Employees who violate our Code put themselves, fellow employees, and our Company at risk and are subject to disciplinary action up to and including termination of employment.

You are expected to comply with both the letter and the spirit of our code. Seek guidance if you have questions or concerns about suspected violations.

#### Manager's Responsibilities

An important part of a leader's responsibility is to exemplify our corporate values and exhibit the highest standards of integrity. If you supervise others, you should create an environment where employees understand their responsibilities and feel comfortable raising issues and concerns without fear of retaliation. If an issue is raised, you must take prompt action to address the concerns and correct problems that arise. You must also make sure that each employee under your supervision understands our Code and the policies, laws and regulations that affect our workplace. Most importantly, you must ensure that employees understand that business performance is never more important than ethical business conduct.

Employees who supervise others have an important responsibility to lead by example, maintain the highest standards of behavior and be ethical role models for all employees.

#### Waivers

The Company will waive application of the policies set forth in this Code only where circumstances warrant granting a waiver based on the best interests of the Company and its stockholders. Any waiver pertaining to an employee must be approved by the Company's Chief Executive Officer and General Counsel.

Waivers of the Code for Directors and Executive Officers may be made only by those members of the Board of Directors not involved in the possible waiver and must be promptly disclosed as required by law or regulation, including through the filing of a Current Report on Form 8-K with the SEC, if so required.

## 2. REPORTING AND NON-RETALIGATION

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Part of our commitment to integrity and ethical business practices includes our obligation to report violations of our Code, our other policies, and the law.

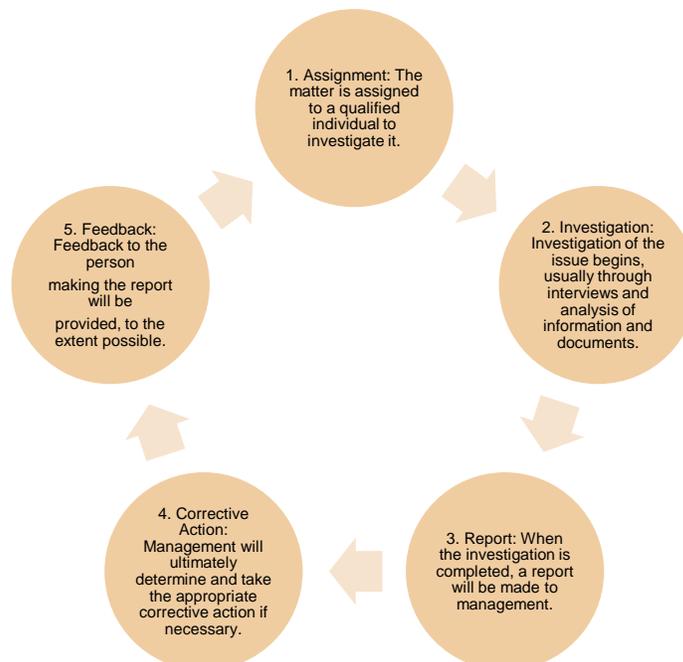
### Reporting

We must come forward with any concerns about compliance with our Code and seek the appropriate guidance whenever there is doubt about the right thing to do. Company employees located in countries that prohibit requiring employees to make such reports are encouraged to report such violations but are not required to.

One way to report a known or suspected violation is through the confidential Compliance and Ethics Hotline, 1-844-591-7913 or [rvlpharmaceuticals.ethicspoint.com](http://rvlpharmaceuticals.ethicspoint.com). You may also report any concerns about compliance with relevant laws or our Code to the Compliance Department directly at [compliance@rvlpharma.com](mailto:compliance@rvlpharma.com).

All questions, concerns and reports of possible violations are treated seriously by the Company. After a report is made and carefully reviewed, the Company takes various steps to resolve the reported concern, which often includes initiating an investigation of the matter, as deemed appropriate by the Company's Legal and Compliance Departments.

The investigation process is outlined below\*:



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\*Confidentiality throughout the process will be preserved to the extent possible.

Employees should not interfere in internal investigations or engage in their own fact-finding. Rather, you should promptly raise ethics and compliance questions and immediately report suspicious behavior. All investigations and any resulting corrective action will be conducted in compliance with local law, applicable Company policies and any required workers' representative consultation requirements.

All employees are expected to cooperate in internal investigations, audits, accounting reviews or directions from Company lawyers in connection with lawsuits or government investigative proceedings. Searches of Company- provided physical and information technology resources may be required.

The Company may, in appropriate cases and subject to applicable local law, notify government authorities and cooperate with any resulting prosecution or other government action. In addition, when legally required or otherwise appropriate, the Company will timely self-report compliance violations to applicable government authorities and cooperate with any resulting official proceedings.

The determination of whether and when to refer a matter to government authorities, or to self-report compliance violations, will be made by the Company General Counsel or his or her designees.

#### Confidentiality

It is essential that you feel secure when participating in the Company's compliance program. In some instances, however, it may be impossible to keep your identity confidential because of the demands of conducting a thorough investigation or certain legal requirements. Where available and permitted by law, colleagues concerned about confidentiality may consider placing an anonymous report to the Compliance and Ethics Hotline.

Confidentiality is a priority and effort will be made to protect your identity whenever you interact with any element of the compliance program.

#### Keep in Mind

It is each employee's responsibility to know and understand legal and compliance ethical standards as they apply to his or her job. Violations of Company ethical standards are grounds for disciplinary action, up to and including termination, and legal prosecution.

#### Non-Retaliation Policy

The Company has a strict "no retaliation" policy. You may raise questions or concerns without fear of retaliation. Retaliation includes, but is not limited to, intimidation or an adverse employment action against an employee.

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Retaliation against anyone who makes a good- faith report about a questionable business decision, action or practice, or provides information or otherwise assists in an investigation or proceeding regarding any conduct that the employee believes constitutes a violation of applicable laws or regulations, our Code of Conduct, or the Company's related policies is prohibited and will, in itself, be treated as a violation of our Code of Conduct.

The Company prohibits taking any negative action against an employee for exercising his or her rights under state or federal employment laws, reporting a possible violation of this policy or for cooperating in an investigation.

By enforcing this non-retaliatory environment, the Company makes it safe for employees and other stakeholders to raise ethics and compliance concerns in good faith. The Company's senior management actively supports and strictly enforces the non- retaliation policy. Retaliation against an employee or a third-party for reporting a concern in good faith is prohibited, and will result in discipline, up to and including termination. Any acts of retaliation should be reported immediately and will be promptly investigated.

#### Open Door Policy

The Company utilizes an "Open Door" policy to encourage communication. Effective communication is essential in any work environment, and employees' supervisors and other members of the Company management team are prepared to discuss concerns that employees may have. Employees should feel free to discuss any issues they may have directly with their supervisor. If employees have any concerns, ideas, suggestions, and complaints or feel they have not been treated fairly, they should use the three-step procedure outlined here;

1. The employee should discuss the issue with their supervisor/ manager as soon as possible.
2. If the employee is not satisfied with the response from their supervisor, or if the issue is of a particularly urgent nature, they may discuss the issue with the next level of management within their department.
3. If the employee is still dissatisfied with the response or the issue persists, they should directly discuss the issue with the Human Resources Department.

At any time, employees can discuss any concerns directly with the Human Resources Department.

Any employee who reports a violation will be treated with dignity and respect and will not be subjected to any form of discipline or retaliation for reporting in good faith.

The Company is committed to making this organization a great place to work and encourages employees to take an active role in raising any issues or providing feedback.

## **3. OUR LEGAL RESPONSIBILITIES AND INDUSTRY STANDARDS**

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We must understand and follow relevant federal and state laws and regulatory requirements and the laws and regulatory requirements of the countries in which we do business. We're committed to complying with all requirements that apply to us. Each of us must be familiar with them, not just because of the substantial penalties associated with violations, but because it's good business and the right thing to do.

This Code applies to all Company Personnel no matter where they conduct business. When our Code is more restrictive than the requirements of another country, we will comply with the Code. However, if the Code is less restrictive than the law or requirement of another country we must follow the law or requirement of that country.

Relevant laws, regulatory standards and industry guidance that apply to the Company can be complex and their applicability may vary depending on particular circumstances. Employees should consult the Legal Department with any questions or concerns regarding these requirements.

For more information regarding our legal responsibilities and industry standards, please see Global Anti-Bribery and Anti-Corruption Policy.

### Anti-Bribery and Corruption

In the U.S., federal and state laws prohibit anyone from knowingly and willfully receiving or paying anything of value (e.g., kickbacks, bribes and rebates) either directly or indirectly to influence someone to recommend, prescribe, purchase or use a product that is reimbursed under federal or state government healthcare programs (e.g., Medicare and Medicaid). Some state laws are broader and apply to all items and services, even those not reimbursed under a government program.

Since the Company operates in the health care and life sciences industry, it is important to have a general understanding of these authorities, even when they do not apply to the Company.

We must fully comply with relevant laws, industry standards and other requirements that apply to us.

#### Anti-Corruption Statutes

The United States and other countries have statutes or laws that prohibit promising, authorizing, offering, or providing money or anything of value with a corrupt or other illegal intent to influence (or attempt to influence) healthcare professionals, foreign officials, or any other persons. The payment of a bribe to (or any payment with the intent to influence) foreign officials is illegal in every country in which the Company does business, and is strictly prohibited by the Company. Bribes are also prohibited if the recipient is in the private sector.

In our business, we must be particularly sensitive to bribery and corruption issues because governments are often both the regulator of our products and a major customer. We also use the services of healthcare professionals and scientists, many of whom are employees of public institutions and may be considered government officials. For this reason, the Company prohibits all employees from offering or making payments or providing or receiving benefits that are intended to improperly influence, or even appear to improperly influence, a government official's actions. The Company also prohibits "commercial bribery," which is illegal in many countries. Commercial bribery is giving something of value to an intermediary (e.g., an employee of a customer), with the intent to influence commercial conduct. All of the above prohibitions apply irrespective of whether the offer, provision, request, or acceptance of the payment or other thing of value occurs directly by a Company employee or through a third party.

#### Anti-Money Laundering

Money laundering is a global problem with far-reaching and serious consequences. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation and can expose the Company and individuals to severe sanctions.

The Company forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion.

We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Anti-money laundering laws of the United States and other countries and international organizations require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable customers involved in legitimate business activities and transactions.

#### Antitrust and Competition Laws

In most of the countries where we operate, strict laws are enforced similar to antitrust laws in the United States and competition laws in the European Union prohibiting collusive or unfair

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business behavior that restricts free competition. There are almost no circumstances allowed by law to enter agreements with competitors to fix prices, bid rigging, terms of sale, production output, or to divide markets or customers. In addition, attempts to discriminate in prices or terms of sale among our customers, or to otherwise restrict the freedom of our customers to compete, may sometimes be illegal. Legal issues may also arise if we refuse to deal with certain customers or competitors.

We strictly prohibit any activity that may be considered to be a restraint of trade, an unfair business practice, price fixing, or unfair competitive behavior. Agreements with competitors do not need to be written in order to violate applicable antitrust and competition laws. Informal, verbal, or implicit understandings restricting competition are also prohibited. Antitrust violations in the U.S may be prosecuted criminally as felonies and can result in severe penalties for the Company and any associate or other person who participates in a violation.

In the United States, the European Union and many other countries, certain activities that hinder free competition among companies may violate local law.

Each of us responsible for an area of business where these laws apply has a duty to understand their requirements. These laws are complex, vary from country to country, and penalties imposed for violations can be severe. Consult the Company's Legal Department before taking action.

United States antitrust and other countries' competition laws are quite complicated, and failure to adhere to these laws could result in significant penalties imposed on both the Company and the employees who violated the law.

#### Procurement

Suppliers are selected on a competitive basis based on total value, which includes quality, suitability, performance, service, technology, and price. We strive toward establishing mutually beneficial relationships with our suppliers based on close cooperation and open communication. Terms and conditions defining our relationship with suppliers are communicated early in the supplier selection process. Any agreements to such terms and conditions, or any acceptable modifications, are reached before work begins. Our Pricing Committee helps ensure that we make good economic pricing decisions that comply with relevant laws.

#### Trade Compliance & Export Laws

United States export control laws restrict the export of goods, software and technology from the United States to certain foreign countries. Both the United States Food and Drug Administration ("FDA") and the United States Customs Service also regulate the export of approved and

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unapproved products and related items. For questions about United States export laws, contact the Company's Legal Department.

Although the applicable laws may vary from country to country, overall antitrust and competition laws prohibit activities that include:

- Setting prices among competitors,
- restricting production,
- allocating the available market among competitors (agreements not to sell),
- refusing to deal with a supplier or customer,
- limiting the quality or type of a product or service, or
- limiting warranties or guarantees.

#### Economic Sanctions, Embargoes and Boycotts

The Company may operate in countries outside the United States and, therefore, is sometimes subject to economic sanctions and embargoes maintained by various governments.

We comply with applicable sanctions and embargoes consistent with United States law. We also comply with United States laws which prohibit participating in the economic boycotts of other countries. We may be obligated to report any request by a foreign government to support a boycott promptly to the United States government. Any such request must be reported immediately to the Company's Legal Department.

We engage in open and fair procurement activities regardless of nationality or the size of the transaction.

#### Prescription Drug Marketing Act

In our business, it is important to comply with all applicable requirements regarding the proper uses and tracking of drug samples, including the United States Prescription Drug Marketing Act ("PDMA"), and similar laws, rules and regulations in other countries where we do business.

Among other things, the PDMA prohibits the selling, purchasing or trading of prescription drug samples or coupons. Our PDMA Policies and Procedure Manual details our obligations for sample record keeping, handling and distribution.

For more information, please see the Company's PDMA Policies and Procedure Manual.

Under the PDMA, samples may be distributed only:

- To HCPs licensed to prescribe such drugs, or
- To pharmacies of hospitals or healthcare entities, at the request of such licensed HCPs, and

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- If requested in writing by validated licensed HCP and using a process that requires a return receipt to the manufacturer or distributor.

#### Our Relationships with Healthcare Professionals

There are many Company policies that govern our relationships with the healthcare industry. In addition, there are United States laws and the laws of other countries that may affect our relationships with healthcare professionals (“HCPs”).

Relevant policies are issued to those of us who interact with healthcare professionals (as defined in our policies), and these policies provide a general overview of healthcare and other laws to help us conduct business legally and ethically. We must also be familiar with and follow industry standards that apply to interactions with healthcare professionals in other countries where we promote human pharmaceuticals, as applicable. For more information, please see the RVL Healthcare Interactions Policy.

#### The Food, Drug, and Cosmetic Act

We must comply with all applicable laws, rules and regulations governing the testing, development, manufacture, labeling, marketing, advertising, promotion, selling and distribution of drugs in the United States and in other countries where we do business. The United States Food, Drug, and Cosmetics Act (“FDCA”) and its implementing regulations establish a number of relevant requirements for human drugs. For more information, please see the RVL Promotional Activities and Materials Policy.

#### The FDCA at a Glance

- Prohibits marketing a drug or use that has not been approved by the FDA, or in a way that is inconsistent with a drug’s labeling.
- Promoting unapproved products and unapproved uses of approved products, or making unapproved or unsupported claims about a product’s safety, effectiveness or characteristics, may be viewed by the FDA as promotional advertising that fails to meet FDA regulatory requirements and therefore is unlawful off-label promotion that violates the FDCA.
- Requires that all promotional communications contain a fair balance of safety and effectiveness information, and are not false or misleading.
- Applies to clinical investigations of certain drugs, including new drugs.

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#### State and Local Marketing Disclosure Laws

In the U.S., certain states and jurisdictions have enacted laws that regulate pharmaceutical marketing and advertising practices or that require disclosures of product pricing, promotional spending, and other matters. These laws may impose restrictions that are stricter than Federal standards. We must all be aware of and comply with these state and local laws.

#### Federal and State Privacy Laws

The Company may receive certain personal health information that may be protected by federal and/or state laws. Company personnel must treat such information carefully and in compliance with privacy laws. In general, personally identifiable health information may be protected under state law. Moreover, while the Company is not subject to the Health Insurance Portability and Accountability Act (“HIPAA”), essentially all of our customers are, and therefore we make efforts to respect the legal obligations of our customers.

#### Government Healthcare Programs

Complying with the laws relating to the government healthcare programs in each country where we do business is incredibly important.

In the U.S., the Company’s product is not currently reimbursed or purchased by federal healthcare programs. That said, we are committed to complying with applicable laws, regulations and written directives, including those related to the contracting, price reporting, and marketing, selling, promoting and advertising of our products in the US.

#### False Claim Laws

The False Claims Act prohibits one from knowingly submitting or causing someone else to submit a fraudulent claim for reimbursement to a government-funded healthcare program. California and other states have enacted similar laws modeled after the federal False Claims Act. Manufacturers have been held accountable under the False Claims Act even though the Healthcare Professional, rather than the manufacturer, submits the claim to the government. Company policies require any and all data that is submitted to government officials be complete and accurate.

Since the Company operates in the health care and life sciences industry, it is important to have a general understanding of these authorities, even when they do not apply to the Company.

Government healthcare programs include (but are not limited to):

- Medicare (in particular, Part D, which subsidizes the cost of prescription drugs for Medicare beneficiaries),

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- the Medicaid Drug Rebate Program,
- the 340B Drug Pricing Program, and
- the Veterans Administration Pricing Programs (as set forth in the Federal Supply Schedule and Veteran's Healthcare Act of 1992).

#### Our Relationships with Government Officials

Our business brings us into contact with a wide range of government officials. We will act responsibly in all such contacts. Each of us has a responsibility to seek and obtain authority from the Company's management to contact government officials on behalf of the Company. For those of us who have been authorized to contact government officials as part of our jobs, we must keep management informed on a timely basis about any discussions with those government officials. In sensitive situations, we must discuss in advance with supervisors our communications with government officials before we contact them.

Similarly, an appropriate member of the Company's management must review all documents before we submit them to a government official or entity. None of these requirements is intended to restrict or limit in any way the rights of any employee to report violations of the law to the government. For more information, please see the RVL Healthcare Interactions Policy.

Making a false statement to a government official, regardless of whether the statement actually misleads the official, may be a criminal act, and in all cases against our code.

Should you have questions or doubts regarding the appropriateness of any item to be provided to a healthcare professional, seek advance guidance from the Company's Legal or the Compliance Departments.

#### Our Relationships with Researchers – Scientific Integrity

We must maintain the highest standard of integrity in our relationships with medical professionals, hospitals, universities and contract research organizations as we conduct clinical safety trials, field safety trials and other research. Our interactions with researchers must be focused on eliciting sound medical judgments.

When we receive patient data or other personally identifiable health information, we will treat it confidentially and safeguard it according to applicable privacy and data protection laws. The integrity of our scientific investigations and their results are critical to our business. We must at all times maintain proper clinical and laboratory practices in accordance with FDA regulations, such as GCP and GLP, and other applicable standards, including those of other countries where we do business.

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All information from clinical research that is published must be complete, accurate, and fairly represented in accordance with applicable Company policies.

#### Keep in Mind

We must never allow time or other pressures or business concerns to compromise our investigations, the safety, welfare or rights of the human subjects, or the safety of our products.

#### Our Relationships with Suppliers and Service Providers

We negotiate fairly and competitively on the prices we pay for materials, supplies and services, while seeking to obtain the maximum value for each expenditure. It is imperative that relationships with suppliers be conducted with integrity and with the confidence that each party will fulfill its commitments.

We must never make any purchase in which we or any family member has a material financial or other interest. In addition, we must disclose any such potential conflict of interest as soon as it is identified. For more information, refer to the topic “Conflicts of Interest” under Section 5.

Vendors and suppliers with whom we do business should be made aware of and encouraged to abide by the standards set forth in the Code. For more information, please see the RVL Fee-for-Service Arrangements Policy.

## **4. OUR ETHICAL RESPONSIBILITIES**

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We strive to be a trusted leader in the marketplace. Abiding by the guiding principles of our Code helps us earn the trust to build a sustainable and profitable corporation.

### Conflicts of Interest

Our Company requires you to avoid any conflict, or even the appearance of a conflict, between your personal interests and the interests of our Company.

### A Conflict Can Arise

- When a director, officer, or employee takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively.
- When a director, officer, employee, or a member of his or her family, receives improper personal benefits as a result of his or her position in the Company.
- If outside employment activities impair timely and effective performance for our Company.

We have an obligation to make sound business decisions in the best interests of the Company without the influence of personal interests or gain. We must conduct business in the best interests of the Company and not ourselves or others. Conflicts of interest and potential conflicts of interest must be avoided.

You should not take employment or provide consulting services for any business entity that is a supplier or competitor of the Company. You should ensure that any outside activity is strictly separated from your employment. You should not use any Company resources or personnel for activities not relating to the Company. Upon receiving advanced approval by the Human Resources Department, you may engage in outside employment or business ventures if that activity does not compete against the Company, does not provide goods or services to the Company, and does not violate your confidentiality or other obligations to the Company.

Private interests and opportunities for personal gain should never interfere or appear to interfere with the interests of the Company. No business decision should ever be influenced by a personal interest in or relationship with any individual or organization that does or seeks to do business with the Company.

Acceptance of any fee or other gifts from suppliers, lenders, landlords, and other third parties is not permitted unless disclosed and approved in advance by the Chief Financial Officer or

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General Counsel. Typically, all employees are prohibited from accepting gifts, except those of nominal value.

If an employee wishes to offer, or is offered any gift, they should disclose the gift to the Company's Chief Financial Officer and General Counsel who shall determine and direct the appropriate activity.

#### Corporate Opportunities

We are all free to pursue business opportunities outside of the Company. However, opportunities discovered through the use of corporate property, information or position must not be used for our personal advantage or gain at the expense of the Company. We have a duty to advance the Company's legitimate interests at every opportunity.

#### Outside Employment

If any Company employee takes on outside employment (including self-employment and outside directorships), it is important to carefully evaluate outside activities to avoid any conflict of interest. Outside employment must:

- Be approved in writing in advance by the Human Resources Department, and you must disclose the nature of the work, time commitment and any other relevant information.
- Never require use of the Company's property, facilities, resources or staff.
- Not be done during regular work hours, even for telephone conversations related to your other job.
- Pose no conflict with or adversely affect your responsibilities to the Company.

#### Keep in Mind

Conflicts of interest may not always be clear; if you have questions, or become aware of a conflict or a potential conflict, you should consult with the Company's General Counsel.

#### Competitive Information

Gathering information about our competitors, often called competitive intelligence, is a legitimate business practice and is a valuable tool in our business. Doing so helps us stay competitive in the marketplace; however, we must never use any illegal or unethical means to obtain information about other companies. When working with consultants, vendors, and other partners, ensure that they understand and follow Company policy on gathering competitive information.

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One benefit of collecting information about the Company's competitors is to evaluate their products, marketing methods and other practices. Although we may do this through legitimate sources, it is not permitted to gather this information by improper methods.

#### Sources and Methods of Collecting Competitive Information

- Legitimate:
  - Publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows.
  - Competitive information appropriately gained from customers and suppliers (unless they are prohibited from sharing the information).
  - Obtaining a license to use the information or actually purchasing the ownership of the information.
- Improper:
  - Attempts to acquire confidential information from a new Company director, officer or employee who formerly worked for one of our competitors.
  - Theft of information.
  - Competitive information gained from customers and suppliers (if they are prohibited from sharing the information).

#### Fair Dealing

We deal fairly with our customers, suppliers, competitors and employees. We discourage and never seek competitive advantages through illegal or unethical activities. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing.

Examples of unfair competition that would not be tolerated by the Company include:

- making untrue or deceptive statements in order to induce a party to enter into a contract,
- committing industrial espionage to acquire a competitor's trade secrets,
- making false, misleading or untruthful comments about competitors' products or services, or
- making unfounded or misleading claims about the Company or its products.

#### Questionable Payments, Gifts or Contributions

Modest gifts, favors, and entertainment are often used to strengthen business relationships. However, no gift, favor or entertainment should be accepted or given if it obligates, or appears to obligate, the recipient, or if it might be perceived as an attempt to influence fair judgment. Our handling of payments, gifts, and contributions impacts how we are perceived in the marketplace. To preserve our standards of ethics and integrity, we prohibit the direct or indirect payment or receipt of bribes, payoffs, entertainment, and anything that may be considered illegal, unethical or compromising. In general, you must obtain approval from the General Counsel, before providing any gift to customers, suppliers, or others that you would not be able to accept from a customer, supplier, or other applicable parties.

We are committed to honest business competition that is in the best interests of the Company.

Never give or accept cash or its equivalent in connection with a business transaction.

Never promise or make loans or investments of any kind without first fully complying with Company policy and applicable record keeping requirements.

Our employees, officers, directors, family members, third parties, and third parties' family members are prohibited from offering, accepting, or receiving a gift if it:

- Is not consistent with customary business practices,
- Is extravagant in value,
- Can be construed as a bribe or payoff in violation of any law, including a bribe to a government official in violation of the United States Foreign Corrupt Practices Act,
- Violates any other laws or regulations, or
- Could cause embarrassment to or discredit our Company if disclosed.

If you receive a gift without notice, that you do not believe to be modest, you have the option of returning it with a note explaining the Company's policy on gifts, donating it to a charitable organization, or if the item is a perishable food item, sharing it with all members of your department.

#### Gifts to Government Officials

We do not give gifts, cash payments, or other compensation to any foreign or domestic government official without advance clearance from the Company's General Counsel. Payments of this kind to foreign government officials can violate applicable anti-corruption laws.

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Specific laws apply to interactions with government officials and employees. For example, the United States and other countries have strict laws that prevent providing anything, including food or beverages, to a government employee. When doing business with government agents, employees or officials, be sure you understand applicable laws as well as local customs and norms. Please discuss with the General Counsel any gifts or proposed gifts that you are not certain are appropriate. For more information, please see the RVL Healthcare Interactions Policy.

We must not misrepresent, to any person inside or outside of the Company, the condition or status of our products.

#### Gifts to and from Customers and Suppliers

We comply fully with all relevant laws, guidance, and standards that permit only certain types of gifts or the transfer of anything of value to purchasers of our products. In addition, we do not accept entertainment or gifts from any individual or organization with whom the Company does business, except items of nominal value customarily exchanged in the course of business. Different requirements apply to gifts to healthcare professionals.

#### Advertising Standards

We advertise, promote and label our products consistently within the requirements of federal and state agencies, including the Federal Trade Commission, the FDA, and the Health and Human Services Department and with applicable laws and requirements of other appropriate regulatory agencies in other countries. Publicly disseminated material must not be false, misleading or deceptive. For more information, please see the RVL Promotional Activities and Materials Policy.

#### Product Quality and Safety

We strive to develop, test and manufacture products in compliance with all relevant product quality standards, including Good Clinical Practices (“GCPs”), Good Laboratory Practices (“GLPs”), current Good Manufacturing Practices (“cGMPs”), and other applicable regulations set forth by the FDA and other appropriate regulatory agencies and consistent with the requirements of other countries where we do business. We also work to ensure that all of our development, manufacturing, and quality processes are appropriately documented and followed at all times.

Each of us has a responsibility to see that our products meet all applicable government regulations and Company standards.

When we become aware of any adverse events or complaints associated with any of our products, we are obliged to document, evaluate, and report them in accordance with regulatory

policy and local law. For more information, please see the Adverse Events and Products Complaints Policies.

Any employee who receives information pertaining to an Adverse Event or product complaint should inform the Company within 24 hours by calling 1-877-482-3788.

#### Promotional and Educational Materials and Detailing

Our responsibilities to the market include promoting, marketing, selling and development of safe products for our customers. We promote approved products for approved indications only, and employees must not engage in off-label promotion. Employees involved in sales and marketing activities must:

- Use only promotional or educational materials that have been approved by the Company as directed by the Company.
- Never create “homemade” promotional materials or alter approved materials.
- Ensure that all promotional materials and communications are balanced, substantiated, accurate and not misleading.
- Promote Company products only for their approved indications.
- Never discuss information about unapproved new products or off-label information.
- Follow Company policies on responding to unsolicited questions from healthcare professionals about unapproved products or off-label use of approved products.

## **5. OUR RESPONSIBILITIES TO THE COMPANY**

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We strive to produce exceptional results for our Company. We do this by functioning as a great team in the workplace. Some of our workplace responsibilities include safeguarding Company property, communicating appropriately with the public, and conducting ourselves professionally on the job. In addition, we each must comply with the relevant state and federal employment laws.

### Business Records and Accounting Responsibility

Accurate business records are essential to the management of the Company. They also help the Company fulfill its obligation to provide full, accurate, and timely financial and other disclosures. All of the Company's books, records, and accounts must fully and accurately reflect the Company's business transactions.

### Company Accounting Records

All of the Company's books, accounts and other records must reflect Company business fairly, accurately and in reasonable detail. We must not intentionally make or maintain records that conceal or disguise any aspect of any Company transaction.

We must be committed to making purchases in the best interests of the Company without favoring any supplier.

### Integrity of Accounting and Financial Reporting

As part of our business, we may have to provide periodic, timely and reliable financial information to investors, creditors, and government agencies. Communications regarding such matters must be complete, fair, accurate and timely. The Company's business affairs are also subject to certain internal and external disclosure obligations and recordkeeping procedures. As a public Company, we are committed to abiding by our disclosure obligations in a full, fair, accurate, timely and understandable manner. Our internal control procedures are further regulated by the Sarbanes-Oxley Act of 2002. The Sarbanes-Oxley Act of 2002 was passed in response to events at public companies involving pervasive breakdowns in corporate ethics and internal controls over financial reporting.

The Act is intended to rebuild confidence in the capital markets by ensuring that public companies are operated in a transparent and honest manner. We must maintain our accounting and financial records on the basis of valid, accurate and complete data, with adequate supporting

## RVL Pharmaceuticals, Inc.

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information to substantiate all entries to the books of account. Each of us involved in collecting, analyzing or reporting financial information is responsible for the integrity of such information.

Ensuring proper and effective internal controls is a priority for the Company.

#### Accounting and Financial Reporting Dos and Don'ts

- Do
  - Assess and state the financial condition and results of operations of the Company in accordance with the Company's standard practices and generally accepted accounting principles;
  - Do maintain records according to law and Company policy; and
  - Report violations immediately to the Chief Financial Officer and General Counsel.
- Don't
  - Establish unrecorded, undisclosed, or "off book" funds or assets for any purpose;
  - Create or pay false or fictitious invoices; or
  - Create false entries or misleading reports.

We must maintain books and accounting records in compliance with generally accepted accounting principles ("GAAP") and other appropriate accounting methods and principles. We must never withhold any requested information from management or from the Company's independent auditors or internal auditors.

Anyone responsible for financial or accounting matters is also required to ensure the full, fair, accurate, timely and understandable disclosure in all reports containing financial information required to be filed by the Company.

#### Employee Responsibilities

Most of us participate to some extent in recording, processing, or analyzing financial or other information, or in the review and audit of these activities. These processes exist to assist in business decision-making and the evaluation of the Company's performance by our Board and senior management. They are also necessary to ensure compliance with legal and other requirements pertaining to the retention of information and its disclosure to others, including to investors and regulators.

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If you have any questions or concerns about the Company's financial records, internal accounting controls, or audit practices, discuss the matter with your supervisor, manager, or the Chief Financial Officer.

#### Employee Responsibilities in Proper Business and Financial Records

- Never make, or ask others to make, a false or misleading entry or report. This applies whether the report is financial or non-financial or for internal or external use.
- Always record business transactions and payments accurately and in accordance with our Company policies.
- Never use or transfer Company funds for any purpose that would be in violation of any law, regulation, or Company policy.

#### Records Retention

Company records must be maintained and retained according to statutory, regulatory, judicial and contractual requirements. Records consist of all forms of information created or received by the Company, whether originals or copies, regardless of media. Examples of Company records include paper documents, e-mail, electronic files stored on disk, tape or any other medium (CD, DVD, USB data storage devices, etc.) that contains information about our Company or our business activities.

All records are the property of the Company and should be retained in accordance with our Records Retention Policy. We are responsible for properly labeling and carefully handling confidential, sensitive, and proprietary information and securing it when not in use.

We do not destroy official Company documents or records before the retention time expires, but do destroy documents when they no longer have useful business purpose. Contact the Legal Department for more specific retention and destruction guidelines.

Our records are our corporate memory, providing evidence of actions and decisions and containing data and information critical to the continuity of our business.

#### Physical Property

All employees must protect our Company assets, such as equipment, inventory, supplies, cash, and information. Use our Company resources only to conduct Company business. No employee may commit theft, fraud or embezzlement, or misuse Company property.

The Company provides an array of information and technology resources intended to maximize our efficiency in carrying out your job such as: e-mail, computers, computer applications,

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networks, the internet, the intranet, facsimile machines, cell phones, other wireless communication devices, telephones, and voice mail systems. Please remember Company and all who work here. Occasional, limited personal use of these resources is permitted, but cannot interfere with your work performance, or the work performance of your colleagues. We cannot tolerate inappropriate or illegal use of these assets and reserve the right to take appropriate disciplinary actions, as needed, up to and including termination of employment.

Moreover, the use of our Company's assets and resources for personal financial gain is strictly prohibited. Any incidents of theft, loss, misuse, improper disposal, damage to, destruction of, or waste of Company physical property, or situations that could lead to such losses, must be reported immediately to your supervisor.

As employees of the Company, each of us is a steward of its assets. Treat Company assets with the same care you would if they were your own.

#### Examples of Inappropriate Use of Company Resources

- Hacking- Distributing literature for outside entities.
- Pirating software or video/audio Files- Distributing confidential, proprietary or trade secret information of the Company to anyone outside of the Company.
- Sending inappropriate e-mail- Accessing inappropriate web sites (such as those advocating hate, violence, sexually explicit material, or promoting illegal activities).

#### Intellectual Property

Our intellectual property is among our most valuable assets. Protecting, and, when appropriate, enforcing our intellectual property rights, is essential to maintaining our competitive advantage.

Employees should therefore use Company intellectual property only for the Company's benefits and consult the Legal Department before disclosing proprietary information to outsiders.

Even if an employee leaves the Company, he or she remains obligated to protect the Company's intellectual property and proprietary information. Protecting property also means that the Company will apply for intellectual property protection whenever appropriate. If you have any questions regarding intellectual property, you should seek the guidance of the Legal Department.

Additionally, the Company works hard to respect the intellectual property of others in order to compete fairly in the marketplace. Therefore, it is important for employees to use the intellectual property of others within licensing agreements and the law, and also to contact the Legal Department whenever an employee mistakenly comes into possession of someone else's intellectual property.

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As an employee, the things you create for the Company belong to the Company. This “work product” is our Company’s property (it does not belong to individuals) if it is created or developed, in whole or in part, on Company time, as part of your duties or through the use of Company resources or information. You must promptly disclose to the Company, in writing, any such work product and cooperate with our efforts to obtain protection for our Company. To ensure that our Company receives the benefit of work done by outside consultants, it is essential that an appropriate agreement or release be in place before any work begins. We value new product and business ideas, concepts, and other information we produce.

“Work product” includes inventions, discoveries, ideas, improvements, Software programs, artwork, and works of authorship.

#### DO NOT

- Disclose non-public intellectual property inappropriately or without approval from the Legal Department,
- Use Company resources or time to create or invent something unrelated to our business,
- Use a previous employer’s intellectual property without that company’s permission,
- Make unauthorized copies of software or licensed information, except as specified in the licensing agreement,
- Photocopy magazine/journal articles or other publications unless you have the authority or license to do so,
- Hire a competitor’s employee to obtain that competitor’s trade secrets,
- Affix the trademark of another company to goods without authorization,
- Fail to remove another’s trademark when the goods or parts are remanufactured, or
- Erroneously allege patent infringement or mark a product with an untrue patent notice.

When we do not identify or otherwise protect intellectual property, our Company risks losing rights to it and the competitive advantages it offers. Protect intellectual property from illegal or other misuse by making sure it is affixed with or identified by appropriate trademark, service mark, copyright notice or patent marking. Disclose to management any innovation developed on Company time or using Company information or resources, so that our Company can decide whether to seek formal protection. Licenses must be obtained to use intellectual property belonging to someone else or we must purchase the outright ownership of the property. In the

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case of property rights with an expiration date, such as patents, you must be sure that this date has passed if licensing or outright purchase is not feasible. Avoid infringing on the intellectual property rights of others.

Please note, employees have the right to disclose trade secrets in confidence to federal, state, and local government officials, or to an attorney, for the sole purpose of reporting or investigating a suspected violation of law. Nothing in this policy is intended to conflict with 18 U.S.C. 1833(b) or create liability for disclosure of trade secrets that are expressly allowed by 18 U.S.C. 1833(b).

#### Using Software

The Company licenses the use of computer software from a variety of outside companies. We do not own such software, or its related documentation. We do not duplicate any software without the authorization of the software manufacturer because it is illegal in the United States and certain other countries and can result in civil damages and criminal penalties, including fines and imprisonment. In addition, the unauthorized duplication of copyrighted computer software is a violation of international copyright laws.

#### Electronic Media

Electronic Media, such as telephones, fax machines, personal computers, data storage units or thumb drives, e-mail and voice mail are provided to us to enable us to do our job at the Company. Each of us has a responsibility to protect these systems and the data that is contained on them from misuse, improper access, damage, and theft. It's important to remember that Company-provided computers, cell phones, and other communication devices, and any communications we produce using them, are neither private nor confidential, and may be viewed or monitored at any time without your consent.

Company equipment must be used primarily for Company business. We permit incidental and occasional personal use, but we require that all Company property be used appropriately at all times. All employees who have been given access to the Company's email system in the course of their work are permitted to use the Company's e-mail to discuss terms and conditions of their employment, but only during non- working hours.

Computers and all information on Company computers, as well as any company information on your home computer or other device, are Company property. Use licensed software or documentation according to licensing agreements, and do not duplicate it without express permission. Protect any passwords that provide access to our Company networks. You are responsible for what you say in an e-mail message. Do not use your Company title or contact information for personal mail, e-mail or anything other than Company business unless you have specific permission from your supervisor.

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Each employee, officer and director must ensure that their use of our Company information systems, networks and tools meets Company standards and policies, including Information Systems policies, security and data protection requirements, and local legal requirements. For more information, please see the Electronic Communications and Social Media Policy.

#### Keep in Mind

Be just as careful and professional with electronic media such as e-mails, instant and text messaging, and other similar forms of communication as you would when writing a formal letter.

You may not post to social media financial, confidential, sensitive or proprietary information about the Company, clients, employees or applicants. You may not post obscenities, slurs or personal attacks that can damage the reputation of the Company, clients, employees or applicants.

Think before you use Company electronic media for non- business purposes and ensure that you comply with all policies when doing so. Communication systems shall not be used for solicitation purposes, outside commercial ventures or any other communication of a personal or commercial nature, including, social, political, religious or otherwise. Sending offensive materials electronically may be considered by certain recipients to be a type of harassment that violates Company policy and can result in Company liability. Social media is of growing importance in the marketplace. It enables us to learn from and share information with our stakeholders, as well as communicate with the public about our Company. In addition to following all Company policies, a general rule to remember when utilizing social media is to think about the effect of statements that you make. These transmissions are permanent and easily transferable, and can affect our Company's reputation and relationships with coworkers and customers.

These standards apply unless they are prohibited by or differ from local law. If these standards are more restrictive than local laws, we will comply with them. If these standards violate local law, we must follow the local requirements.

#### Public Communication

Only selected members of senior management are authorized to conduct interviews or discussions with interested parties. All other employees are prohibited from speaking with the media, investors, and analysts on behalf of the Company. Unless authorized, do not give the impression that you are speaking on behalf of the Company in any communication that may become public. This includes posts to online forums, social media sites, blogs, chat rooms, and bulletin boards. This policy also applies to comments to journalists about specific matters that relate to our businesses, as well as letters to the editor and endorsements of products or services. All inquiries from non-employees about the Company or its business, pending legal

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matters or other sensitive issues must be referred to the Human Resources Department or as specified under the Regulation FD Policy for inquiries from the investment community. Internal communications may not be forwarded to anyone outside the Company, except to authorize Company agents needing such information to represent the Company as determined by senior management. Communications include e-mail, newsletters, written memoranda, and presentations (unless delivered in a public forum or otherwise available through our website). For more information, please see the Regulation FD Policy.

It is important that our communications with the public be complete, fair, accurate and timely.

#### Managing Our Information

We deal with business-related information about our performance, our plans, our proprietary technologies, our products and a host of other matters, which we must control carefully to maintain our competitiveness, reach our performance goals, and comply with various laws and regulations. We also generate or receive and store personal information about our employees and non-employees that must not be disclosed, both for legal reasons and because we are committed to maintaining individuals' privacy. We must comply with applicable privacy laws, rules and regulations wherever we do business. These rules are complex and differ from country to country. Consult the Legal Department with questions or concerns.

#### Confidential Information

We must prevent disclosure of the Company's confidential information to unauthorized persons. If you need to send confidential information outside the Company, make certain there is a confidentiality agreement with the person receiving the information. Be cautious and thoughtful when sharing confidential information in writing, including e-mails, and during private conversations. Consider your surroundings when talking on a cell phone or in a public place.

We must be sensitive about our handling of Company information.

We may encounter confidential information that belongs to or is to be provided to third parties, such as former employers, our suppliers and customers, and other business partners. We may not use or disclose such information without the consent of the third party or without taking appropriate precautions. Furthermore, third-party patient information – for example, information obtained from adverse event reports or other materials – should remain confidential. The disclosure of confidential medical information is prohibited by law in many circumstances.

Some of the Company's most valuable assets are intangible and include our trade secrets and Company confidential information. You must guard our intangible assets just as you would our Company's physical assets.

### Examples of Confidential Information

- Strategy and finance
  - Undisclosed financial information and earnings reports
  - Merger, acquisition, divestiture or business plans
  - Capital requirements and plans
  - Product costs and volumes
- Product and technology
  - Confidential product performance information
  - New product offerings
  - Confidential technical data
  - Proprietary computer software
- Operations
  - Procurement plans
  - Personnel information or organizational changes
  - Marketing, pricing or service strategies
  - Business negotiation information
- Other
  - Proprietary or classified government information
  - Confidential information about our customers
  - Medical information about patients using our products
  - Proprietary information about our business partners

Violations of our obligations regarding confidentiality of Company information or a prior employer's information may expose both the individual and the Company to civil and criminal liability.

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Note that nothing in this policy should be construed to prevent employees from communicating with any government entity concerning matters relevant to that governmental entity. Employees should understand that they cannot be held criminally or civilly liable under any federal or state trade secret law for disclosing a trade secret (a) in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney, solely for the purpose of reporting or investigating a suspected violation of law, or (b) in a complaint or other document filed under seal in a lawsuit or other proceeding. This immunity notwithstanding, employees may not unlawfully access trade secrets by unauthorized means. If you discover that confidential information has been publicly disclosed, you should immediately contact the Company's General Counsel.

#### Insider Trading

In the course of our work, we sometimes gain information about our Company or other companies we deal with that has not yet been communicated to the general public and would be important to making a reasoned investment decision. It is known commonly as "inside information"; if used to make an investment decision, such action may constitute insider trading.

We do not provide inside information to others. We do not buy or sell the securities of our Company or other companies based on inside information, unless the information becomes public or immaterial. If we engage in trading securities of our Company or of any other Company based on inside information or disclose material, non-public information to others, we are subject to severe criminal and civil penalties. In addition, the Company will report insider trading by any Company employee to the appropriate authorities, and we will cooperate fully in any resulting investigation. For more information, please see the Insider Trading Policy.

#### Examples of "Inside Information"

- Earnings forecasts
- Possible acquisitions or joint-ventures
- Acquisition or loss of a significant contract
- Dividend actions
- Major litigation developments
- Important product developments
- Significant personnel changes

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- Undisclosed stock buyback plans Pending regulatory actions

#### Employee Information

We respect the privacy of our employees and will protect personal and confidential information that we are required to obtain for operating or legal purposes. Access to personal employee information, such as personnel information and medical records, is limited by Company policy and data privacy laws and regulations. You may have the right to access your own personnel or medical information, but you may not access or use the employee records of others unless authorized to do so.

While we respect employees' privacy, we reserve the right to inspect our facilities and property, such as computers, telephone records, lockers, e-mails, files, business documents and workplaces. Employees should not expect privacy when using Company-provided services or equipment. It is inappropriate and prohibited to disclose employee information either inside or outside of the Company, unless there is a legitimate business need or the Company is legally required to do so. We must comply with all applicable laws relating to accessing and disseminating employee information. Contact the Human Resources Department with questions.

Personal information about employees may be accessed only by those who need to know it to perform their jobs.

#### Contractual Commitments

The Company regularly enters into contractual agreements and commitments. All leases, contracts and agreements must be in writing and approved in accordance with Company policy or other process approved by the Legal Department.

#### Employment Contracts

Employment contracts are important and necessary tools in business. However, no employee has the authority to enter into any employment contract on behalf of the Company without the approval of the Chief Executive Officer or an individual designated by the Chief Executive Officer.

#### Legal Proceedings

There may be a time when the Company becomes involved in legal proceedings. Company officers and employees are required to notify, in writing, to the Legal, Human Resources, or Compliance Departments if you are:

- Named in lawsuit as a defendant, plaintiff or third-party related to Company business,

## **RVL Pharmaceuticals, Inc.**

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- Arrested, indicted or convicted of any crime or disorderly offense, excluding traffic violations, provided that, if you use a Company-provided vehicle, or if your job requires driving, you must notify the Company of any violations related to drinking or drug use while driving,
- Subpoenaed to testify or produce evidence in any matter related to Company business,
- Identified as the subject of an investigation or questioned by any law enforcement or regulatory agency related to Company business,
- Named in a complaint filed by any regulatory agency, or
- Involved in a lawsuit that may reasonably result in the Company becoming involved in such lawsuit.

### Publications and Speaking Engagements

All employees may participate in speaking engagements and may author publications as they wish. However, employees should not author or coauthor articles, books, newsletters or other publications or make public presentations (for example at continuing education seminars or at trade or professional symposia) which in any manner relate to the Company, your work at the Company, or any Company product without having first obtained permission from the Company's General Counsel or Human Resources Department.

If any employee wants a non-employee to make a public presentation relating to the Company or any of its products, the employee must first consult with the Company's General Counsel to put an appropriate contract in place. For more information, please see the Regulation FD Policy.

## **6. OUR RESPONSIBILITIES TO EACH OTHER**

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### Anti-Harassment

Each employee has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, the Company expects that all relationships among persons in the office will be business-like and free of bias, prejudice and harassment.

The Company encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of the Company to promptly and thoroughly investigate such reports. For more information please see the Company Employee Handbook.

Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. Depending on the circumstances, harassment can also include unwelcomed joking, teasing or other conduct directed toward a person because of his or her gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

The Company is committed to a work environment in which all employees are treated with respect and dignity.

### Equal Treatment

We are committed to the principles of equal employment opportunity, inclusion and respect.

All employment-related decisions must be based on Company needs, job requirements and individual qualifications. Always take full advantage of what our team members have to offer; listen and be inclusive.

We do not tolerate discrimination against anyone – team members, customers, business partners or other stakeholders – on the basis of race; religion; color; sex (including pregnancy); gender identity; sexual preference; sexual orientation, national or ethnic origin; weight; height; age; physical or mental disability; citizenship status (as long as a Company employee is authorized to work in the country of employment); marital status; past, present or future military service; or any other factor protected by the laws and regulations in the locations where we operate.

We provide reasonable accommodations to individuals with disabilities. Report suspected discrimination right away and never retaliate against anyone who raises a good faith belief that unlawful discrimination has occurred. For more information please see the Company Employee Handbook.

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Having a diverse workforce – made up of team members who bring a wide variety of skills, abilities, experiences and perspectives – is essential to our success.

We are committed to providing a work environment based on mutual respect and trust, and where everyone is free of harassment, unlawful discrimination and retaliation. Violations of this policy will not be tolerated.

This pertains to applicants and employees in all phases of employment, including recruiting, hiring, placement, training and development, transfer, promotion, demotion, performance reviews, compensation and benefits, and separation from employment.

We each have a responsibility to understand and follow policies and regulations related to equal employment, non-discrimination and non-harassment. Immediate supervisors, other members of management, or the Human Resources Department are available to discuss questions, concerns, problems or complaints involving discrimination or harassment.

If you report concerns, your identity will be kept confidential to the extent legally permissible, and appropriate steps will be taken to prevent retaliation against you. The Company does not tolerate retaliation. For more information please see the Company Employee Handbook

#### Work Environment

Our work environment should be clean, healthy and safe. We all are responsible for ensuring that our operations meet applicable government and Company standards.

We must all be aware of environmental laws, health and safety issues, and Company policies related to our business. Applicable health and safety laws are posted in relevant work areas or are otherwise available through the Human Resources Department.

We must practice safety in our workplace. Report any injury, accident or unsafe situation immediately to your supervisor and Human Resources. For more information please see the Company Employee Handbook.

#### Fair Wages

The Company is committed to following all applicable wage and hour laws and regulations. To help ensure that all work performed for the Company is compensated correctly, employees compensated on the basis of hours worked must report and record time accurately in accordance with established local procedure.

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#### Health and Safety

An important goal of the Company is to ensure the safety of our facilities and working conditions. Following all applicable laws that concern the health and safety of our employees as well as our customers is a Company priority.

#### Threatening Conditions

The Company will not tolerate violence, threats of violence, physical intimidation or other conduct that may compromise workplace or individual safety. If you believe that the words or conduct of another individual threaten violence or suggest harm to others, immediately report it to your supervisor or the Human Resources Department.

#### Weapons, Drugs and Alcohol

The Company strives to maintain a workplace that is free from illegal use, possession, sale, or distribution of weapons, alcohol or controlled substances. You may not possess firearms, other weapons, explosive devices or dangerous materials in the workplace unless you have prior authorization. The Company also requires employees to work free from the influence of any substance, including drugs and alcohol, preventing them from conducting work activities safely and effectively.

Our Company reserves the right to have any employee tested if there is reasonable suspicion that he or she is under the influence of drugs or alcohol. If you have a problem related to alcohol or drugs, you are encouraged to seek assistance from the Employee Assistance Program or other qualified professionals and review the Company's Alcohol and Drug Free Workplace Policy. The illegal possession, use, purchase, transfer or sale of weapons, narcotics, alcohol, or other controlled substances, or any attempt to carry out such activities, is strictly prohibited, on Company-owned or controlled property, in Company-owned or Company-leased vehicles, during Company business, or at Company-sponsored events.

Notwithstanding the restrictions set forth above, employees with the title Vice President and above may authorize the consumption of alcohol for special occasions or for certain business meetings, either on Company property or at Company-sponsored events off site. Although alcohol may be served at such events, consumption is completely voluntary, should always be in moderation, and never in a manner that would embarrass or harm the Company. For more information please see the Company Employee Handbook.

If you are using prescription or non-prescription drugs that may impair alertness or judgment, or witness an employee impaired and therefore possibly jeopardizing the safety of others or the Company business interests, you should report it immediately.

## **7. OUR RESPONSIBILITIES TO THE COMMUNITY**

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### Political Contributions

We encourage our employees, officers, and directors to contribute to the community and to fully participate in local, national and international political processes. However, there are certain ethical guidelines for doing so. As a private citizen, you are free to make contributions to causes, candidates or political parties of your choice. Employees shall not make any contribution of Company funds, property, or services to any political party or committee, domestic or foreign, or to any candidate for or holder of any office of any government - national, state, local or foreign. This policy does not preclude, where lawful Political contributions made by the Company that have been reviewed and approved in advance by the Chief Executive Officer. The Company will comply with all relevant laws regulating its participation in political affairs, including political contributions.

If you express a personal view in a public forum (such as a letter to the newspaper), do not use Company letterhead, Company e-mail, or reference your business address or title.

### Charitable Contributions

Company employees may contribute to charitable organizations of their own choice. However, as with political activities, you may not use Company resources to personally support charitable or other non-profit institutions not specifically sanctioned or supported by the Company. You should consult the Legal or Compliance Departments if you have questions about permissible use of Company resources.

### Environmental Stewardship

We are committed to conducting business in an environmentally responsible manner and strive to improve our performance to benefit our employees, customers, communities, shareholders, and the environment. Employees whose work affects environmental compliance must be completely familiar with the permits, laws, and regulations that apply to their work. All employees are responsible for making sure that Company business is conducted in compliance with all applicable laws and in a way that is protective of the environment.

## **8. IMPORTANT CONTACT INFORMATION**

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1. Compliance & Ethics Hotline:
  - a. Telephone: 1-844-591-7913
  - b. Web: [rvlpharmaceuticals.ethicspoint.com](http://rvlpharmaceuticals.ethicspoint.com)
2. Compliance Department e-mail: [compliance@rvlpharma.com](mailto:compliance@rvlpharma.com)
3. Legal Department e-mail: [legal@rvlpharma.com](mailto:legal@rvlpharma.com)

This Code reflects policies, practices, and procedures of RVL Pharmaceuticals, Inc. (collectively referred to in this document as “Company”), which are subject to change. This Code is not legal advice and does not replace the advice of counsel.

The Code is the guide to the Company’s policies and legal requirements that govern how we conduct business around the world. This manual is a general reference for all employees everywhere we do business. It does not describe all applicable laws or Company policies, or give full details on any individual law or policy. The Company reserves the right to modify, revise, or alter any policy, procedure, or condition related to employment at its sole discretion and at any time without notice and without revision of the Code. The contents of the Code do not constitute the terms of a contract of employment, and nothing contained herein should be construed as a guarantee of continued employment — employment with the Company is on an at-will basis. The Code is not a legal document and is intended for informational use only. The information herein supersedes previous printed Codes, can be changed or revoked unilaterally by the Company at any time, and is not all-inclusive.

## 9. QUESTION AND ANSWER (“Q&A”)

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- How can I be sure I will not violate a small technicality of a law? The different laws are so complicated and cover so many different areas, how can I be sure that I won't violate some little technicality? Moreover, how am I supposed to understand it all?
  - Don't abandon your own judgment. If something seems intuitively wrong to you, ask before acting. You also have an obligation to understand the finer points of the rules governing your job. Do not hesitate to contact the Legal or Compliance Departments if you need clarification of the laws or of our standards and policies.
- During a dinner break at an industry conference, someone who works for one of our competitors mentioned that his company was considering increasing prices because of certain industry pressures. Everyone knows that our Company is also experiencing these same pressures. Is it okay for me to discuss our pricing plans?
  - No. You may never discuss pricing with a competitor. This prohibition applies equally to learning the competitor's pricing practices or plans (other than from publicly available information) and to revealing those of the Company. As soon as you realize that a competitor is starting to raise this subject, you should break off the discussion, even if it means walking out in the middle of a meal. You should then immediately report what happened to the General Counsel.
- My brother owns a business and wants to be a Company supplier. May I direct him to a Company manager?
  - Yes. You may direct your brother to the person who may be interested in his product or service. However, your supervisor and the person making the purchasing decision should be told about the relationship. Normal Company procedures for selecting a vendor must be followed to make sure there is no appearance of special treatment for your brother.
- May we hire another Company to investigate a new product a competitor is ready to launch?
  - Yes, as long as you have a written agreement with the Company requiring the Company to abide by the law and our Company policy. The Legal Department can help you draft an agreement.
- What is the difference between a “gift” and a “bribe?”
  - A “gift” is made with no strings attached in the interest of, for example, building a business relationship or expressing thanks. A “bribe” occurs if you accept or give

something of value to someone in return for something else, such as the award of business or the exercise of the other's discretion or influence.

- In our region, we are expected to offer expensive gifts and lavish entertainment. We can't compete effectively if we appear ungenerous. What should I do?
  - Gifts and entertainment are things of value and may not be given to obtain or retain business or to obtain improper advantage. However, gift giving and entertaining are not always illegal. Gifts must be reasonable, in accordance with customary courtesies, related to a legitimate business purpose, presented openly with complete transparency, properly recorded in the Company's books and records, and permitted under applicable laws, and the guidelines of the recipient's employer. You must consult with the General Counsel before giving a gift to a government official. If you have any doubt about the propriety of a gift or entertainment, do not give it.
- If my department has made its revenue target for the quarter, is it okay for us to defer recognition of additional revenue to the next quarter?
  - No. Under generally acceptable accounting principles, all revenue and expenses must be recognized in the period in which they are earned or have occurred.
- I have some records in my files that I don't use anymore. Can I discard them?
  - Before you dispose of a Company record, you should refer to our Company's Record Retention Policy to determine how long the record must be held in your files. You must also be sure to verify that the record is not subject to a Tax Hold or Legal Hold. If you have questions about the correct retention period for a Company record, contact the Legal Department.
- What constitutes misuse of our Company assets and resources? How do we know if personal use of our Company assets and resources cross the line of reasonableness?
  - The following examples are illustrative of misuse and unreasonableness:
    - Use of our Company facilities for personal gain.
    - The excessive use of the telephone or facsimile for personal purposes.
    - The taking of office supplies or equipment for personal consumption or use at home, (e.g., using our Company equipment to repair personal property).
    - The personal use of our Company vehicles without express authorization.
    - The unauthorized copying of computer software programs.
    - The use of our Company-issued credit card(s) for personal purchases.
- How do I know if something is a Company trade secret or confidential?
  - You should treat everything you learn about the Company and its business as a trade secret or confidential, unless it is obviously a matter of general public knowledge. A particular document or other material containing information does

not need to be marked “trade secret” or “confidential” to be treated as such. If you have any questions, you should contact the General Counsel.

- I received an e-mail that contains a statement that could be misunderstood or viewed as improper. What should I do?
  - It is important that our written communications are accurate and leave the proper impression. If you are concerned about potential implications of an e-mail, you should call the author and discuss your concerns. You (or the original sender) should then send a second e-mail clarifying the intent of the original e-mail. Simply deleting the troublesome e-mail is not enough. Deleted e-mails are usually recoverable, and it is important to correct potential misperceptions.
- We hired a person who formerly worked for a competitor. She is aware of proprietary and confidential information about her former employer. Is it okay for her to share this information at the Company?
  - No. Company policy prohibits disclosing proprietary, technical information and confidential business information about her former company. Even if it were accidentally disclosed, you cannot use the information. Simply stated, our Company will treat proprietary and confidential information about other companies in the same way that we expect former Company employees to treat our confidential information after leaving.
- What happens if I receive a subpoena for documents or testimony?
  - Do not attempt to respond to the issuer of the subpoena directly. A subpoena usually requires a quick response, so forward it immediately to the Legal Department.
- I believe that I did not receive a promotion because my boss knows that I am pregnant. I heard my manager say that when a woman becomes pregnant, it inevitably interferes with job performance. Is there anything I can do?
  - Yes. All employment-related decisions at the Company (e.g., promotion, remuneration, training, etc.) must be based on job-related criteria, skills and performance. You should report the situation to your Human Resources representative. A report could also be made using the Compliance and Ethics Hotline.
- I suspect that my co-worker is abusing prescription drugs. Since this is not an illegal substance, should I tell someone?
- Abuse of legally prescribed drugs can be just as dangerous as abuse of illegal substances. Talk to your co-worker about our Company’s Employee Assistance Program if you are comfortable doing so. Otherwise, share your concerns with your manager, Human Resources or the Compliance and Ethics Helpline.

## 10. KEY TERMS

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- **Retaliation:** Any action, statement, or behavior that is designed to punish an employee for exercising his or her rights under applicable law, or for reporting, cooperating with investigations or inquiries, or seeking guidance regarding noncompliance with laws or regulations, or the Company's Policies, or to deter an employee from taking such action.
- **Kickback:** Something of value provided for the purpose of improperly obtaining or rewarding the recommendation, prescription, purchase or use of a product.
- **Anything of Value:** Consists of cash payments, gifts, services, charitable donations, political contributions, travel, meals, or entertainment, or any other item that may have value to the recipient.
- **Foreign Official:** Any officer or employee of a foreign government (any department, agency or instrumentality) or public international organization. HCPs at government-owned hospitals, for example, may qualify as foreign officials.
- **Money Laundering:** The process of converting illegal proceeds so that funds are made to appear legitimate—not limited to cash transactions.
- **Healthcare Professionals ("HCP"):** Any physician, nurse practitioner, physician assistant, pharmacist or any other person with pharmaceutical prescribing or dispensing authority or the ability to make clinical treatment decisions or set clinical guidelines under applicable laws; Office staff or paramedical personnel in a physician's office or hospital setting; or Any wholesaler, distributor, managed care entity, group purchasing organization, hospital or any other person or entity in a position to purchase, recommend, refer or arrange for the purchase, sale, or formulary placement of any Company product
- **Business Transactions:** Include time sheets, vouchers, bills, purchase orders, sales orders, all contractual obligations, invoices, expense reports, payroll and benefits records, performance evaluations, and other essential Company data. Can also refer to creations of the human mind that are protected by various national laws and international treaties, and includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise, and other intangible industrial or commercial property.
- **Sexual Harassment:** Constitutes discrimination and is illegal under federal, state and local laws. Depending on the circumstances, harassment can also include unwelcomed joking, teasing or other conduct directed toward a person because of his or her gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

# 11. APPROVAL SHEET

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Policy Title: RVL Pharmaceutical, Inc. Code of Conduct

Policy Number: RVL-HCC-Pol-00030

Effective as of: May 2021

Document Owner: Jessenia Morales, Compliance Manager

Approval Required By:	Signature:
Name: Brian Markison Title: CEO	
Name: JD Schaub Title: EVP & COO	
Name: Chris Klein Title: General Counsel	
Name: Jessenia Morales Title: Compliance Manager	