



COLLEGIUM ANTI-BRIBERY/ANTI-CORRUPTION POLICY

PURPOSE

- This policy sets forth our commitment to preventing and detecting bribery and corruption of all types, and sets the basic standards for our interactions with all third parties, including commercial counterparts, healthcare professionals, government employees and government entities.

SCOPE

- This policy applies to all employees, officers and anyone acting on behalf of Collegium Pharmaceutical, Inc. ("Collegium") and must be reviewed and acknowledged on an annual basis as part of Collegium's compliance program training program.
- Although there is particular sensitivity in Collegium's interactions with healthcare professionals (HCPs) and government entities due to the industry in which we operate, this policy applies to our interactions with all third parties, including any commercial counterpart.
- We will take reasonable measures to ensure that all third parties with whom we work respect and comply with anticorruption/antibribery laws and principles.

Q: Are we responsible for the actions of third parties?

A: Under certain circumstances, yes. For this reason, we must be careful and diligent about whom we engage and monitor their activities as they act on our behalf.

- In addition to this policy, be sure to consult other applicable policies, laws and regulations before engaging a third party to do business with Collegium.

Q: What if the legal standards are stricter than the principles in this policy?

A: In every case, you should apply the most restrictive standard.

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COMMITMENT

- We are committed to doing business with integrity and complying with all applicable legal and ethical standards.
- We adhere to all pharmaceutical industry codes applicable to where we do business.
- We conduct business fairly and transparently.
- We prohibit all forms of bribery, corruption and other behavior that could constitute or appear to constitute the exertion of, or an attempt to exert improper influence to attain or retain business.
- We prohibit the making of facilitation or “grease” payments.

Q: What are facilitation or “grease” payments?

A: Facilitation payments are small, sometimes nominal, sums requested in order to expedite the performance of a routine function. Facilitation payments are illegal in many jurisdictions and will always be contrary to Collegium's Code of Ethics.

- Our interactions with HCPs, government employees, government entities and other third parties must be legitimate and never have a purpose to obtain an improper advantage or improperly influence or encourage a decision by them.

Q: What is a healthcare professional, or HCP?

A: It is any individual, institution, or entity who in the course of their professional activity, may prescribe, supply, administer, purchase or acquire a medicine, or to influence any of the foregoing. Some common examples include doctors, pharmacists, nurses, hospitals, private health funds and medical societies, as well as administrative or clinical support staff who provide support to the HCPs.

KEY PRINCIPLES

No Inducements

We will not offer, promise or provide any inducements, such as payments or other things of value, in any of our business transactions or interactions other than payments for the fair market value of

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goods and/or services received. We will not select someone to provide services with a purpose to directly or indirectly obtain an improper advantage or improperly influence or encourage a decision or action, such as those affecting tax, inspections or audits by regulatory agencies, clinical trials, the decision to grant a permit, accelerate market access, prescribe, recommend, purchase, sell or arrange for the prescribing, recommendation, purchasing, sale or reimbursement of any Collegium product. Neither will we offer indirect inducements, such as those made to family members to obtain or retain business, or secure any professional or personal advantage.

Q: What types of payments or things of value are we concerned about?

A: Anything of value could be prohibited, depending on the circumstances and the recipient. Non-cash payments, such as any type of benefit, gift, entertainment or even favors are payments or things of value, and if promised or offered inappropriately, can violate this policy, as can all of the following, if offered with improper motives (the list is an example; it is non-exhaustive):

- Consulting, speaking or other service opportunities.
- Medical education; travel; accommodation.
- Grants; donations; charitable contributions.

Justified Business Purpose

We must have a justified business reason and proper motive for everything we do.

- Third parties, in particular HCPs, government employees and entities, may only be engaged to provide services for which we have a justified business need that is defined and documented in advance, and for which such persons are appropriately qualified to provide. We should never provide anything of value with a motive of getting or retaining business from the recipient or any associated or affiliated person or entity.

Q: What is a justified business need for services?

A: This is a need for services reasonably required for the legitimate operation of our business that we have determined can only or most effectively be met by engaging a third party.

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- Meals, refreshments, travel and accommodation can only be offered, provided or paid for in connection with a justified business event or activity, only to the actual participants, and never to influence their decision to purchase our products or otherwise do business with us, or personally benefit them or other third parties, in particular HCPs, government employees or government entities.
- Charitable or educational grants and donations may only be given in the spirit of being a good corporate citizen and in accordance with existing company policies and procedures.

Transparency and Documentation

- All interactions with third parties, in particular HCPs, government employees or entities, must be transparent and accurately documented. The purpose and appropriateness of anything of value provided must be clear.
- Books, records and accounts must accurately and fairly reflect all transactions and dispositions in reasonable detail.
- All service agreements must be processed in accordance with the Collegium contract review process and be subject to a written contract that is properly executed and authorized by all relevant parties.
- HCPs, government employees and government entities who publicly act on our behalf must be required by the contracts to declare their engagement with Collegium, where required or appropriate.
- All monetary payments by Collegium to third parties for documented and justified business purposes, as defined by this policy, shall be made via an approved company financial payment system (e.g. by bank transfer, check, company credit card, etc.). Payments must not be in the form of cash or cash equivalent (e.g., debit cards, gift cards, gift certificates, etc.), and shall be accurately and appropriately recorded in the company's books and records.
- Where payments are made through a specifically authorized third party, on behalf of Collegium, when genuine business needs require such an arrangement, the third party shall be contractually obligated to accurately document, track and report to Collegium the amounts paid on its behalf, as dictated in this policy.

Reasonableness of Value, Amount and Frequency

Anything we pay or provide for services must be reasonable and permissible as determined by governing policies and regulations.

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- Payments and reimbursements must be reasonable and in line with prevailing market rates, also known as Fair Market Value (FMV). FMV rates should be determined through Collegium’s existing FMV calculation process. Things of value, including gifts, hospitality, accommodation and travel, must be permissible under applicable policies and regulations, and should also be reasonable in nature and not lavish or excessive in value, amount and/or frequency.
- Any giving or receiving of items of value or hospitality that is based upon a genuine personal relationship independent of Collegium, and which is personally funded by the individual(s) involved (without company reimbursement) is permissible and not restricted by this policy, so long as it is not intended and could not be viewed as intended for improper influence. When in doubt, contact the Compliance Department.

IMPLEMENTATION

Compliance Department

Collegium’s Compliance department will implement a general employee training including:

- Periodic distribution of this policy and its accompanying or applicable principles.

Department Management

Management of each Department or other organizational unit must:

- Ensure that this policy is embedded in their business activities and adhered to.
- Train, oversee and supervise employees in accordance with the principles articulated in this policy, as applicable.
- Implement processes, awareness, training and controls, in line with the Company’s Code of Ethics.

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Q: What counts as a failure to follow this policy?

A: The following are some examples of what could be considered a failure to follow this policy:

- Failure to implement the principles and obligations set forth in this policy;
- Failure to report a suspected or actual violation of law or a breach of the principles set out in this policy;
- Falsification of documents related to payments or things of value provided to a third party;
- Lack of attention or diligence on the part of supervisory personnel that directly or indirectly leads to a violation of law/this policy; and
- Direct or indirect retaliation against an employee who reports an actual or suspected violation of law or the principles articulated in this policy.

Enforcement

Failure to follow the principles set out in this policy may result in disciplinary action, up to and including termination.

Reporting concerns:

We encourage all Collegium personnel to report any suspected or actual violations of this policy, laws or regulations to management, the Compliance department, Human Resources, Legal department or through the anonymous Whistleblower Ethics Hotline (available at <https://secure.ethicspoint.com/domain/media/en/gui/62047/index.html> or by calling the toll free telephone number (844) 764-2360), in accordance with our policies, applicable laws and regulations, and to assist, where applicable, with investigations.

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REFERENCES

For further guidance or additional information see:

- Collegium’s Code of Ethics
- Travel and Expense Policy
- Procurement Regulations and Requirements
- Collegium’s Contract Approval Process
- Collegium’s Conflict of Interest Policy
- Fair Market Value Determination Process (Fair Market Value Cards)
- Commercial Customer Interactions Policy
- The PhRMA Code
- Federal and State-Specific Laws and Regulations

HISTORY

- Version 1.0 – July 2016
- Version 2.0 – June 2019
- Version 3.0 – February 2023

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DEPARTMENT RESPONSIBILITIES:

OWNING, APPROVING AND STAKEHOLDER DEPARTMENT(S):

Department: Compliance Department

Name: Sanga Emmanuel

DocuSigned by:

Signature:

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Title: Chief Compliance Officer

Date: 2/17/2023

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