



TITLE: ENVIRONMENTAL MANAGEMENT POLICY

1. Commitment

We are a pharmaceutical company, and we take our responsibility for the environment seriously. Our goal is to make a positive impact on our patients, stakeholders, the environment, and the communities we work in. We believe that by being environmentally responsible, we can ensure our long-term success and contribute to a more sustainable business organization. Specifically, we're continuously working to reduce our environmental impact and minimize our greenhouse gas emissions in line with global standards and agreements governing the same.

2. Scope

This policy applies to Collegium Pharmaceutical, Inc., including all its affiliates, our employees, business partners, and consultants/contractors working for Collegium. The policy may change from time-to-time depending on local regulatory environment. When local regulation(s) becomes stricter than enumerated in this policy, then that/those regulation(s) shall govern this policy.

3. Management Approach

We regularly identify significant environmental factors, set objectives, take appropriate actions, and monitor outcomes to evaluate our performance. These environmental considerations are integrated into our business planning, thus becoming an essential part of our operations. We evaluate environmental risks as part of Collegium's management process and stay updated on new laws, regulations, and standards to ensure compliance with relevant norms and ongoing regulatory environment.

The organization has created a dedicated integrated working group, comprising of representatives from various departments, which is tasked with shaping and overseeing our environmental impact initiatives. Leading these efforts is a steering committee comprised of executive management members. Environmental performance is measured using key performance indicators aligned with globally recognized standards. Our environmental management system undergoes regular reviews and enhancements to remain current with the latest technologies and applicable standards. This policy is subject to approval by a designated member of the steering committee, thus ensuring alignment with the strategic direction set by senior management.

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4. Products and Production Processes

Our products help improve the lives of patients living with various ailments. To ensure their quality and effectiveness, we adhere to precise specifications and the mandated governing regulations. This encompasses assessing potential environmental risks stemming from the sourcing and use of resources, manufacturing processes, components and products, supply chain and waste management.

Throughout our operations, we prioritize commitment to quality and compliance along with ensuring that we adhere to and meet all relevant safety, security, and environmental protection measures. We proactively take deliberate actions to prevent contamination of the air, soil, or water.

5. Communication

Our primary environmental initiatives and key performance indicators are gathered and reported in accordance with globally recognized standards as part of our periodic ESG reports. We are committed to constant open communication on environmental matters with all our stakeholders. We actively encourage our employees to adopt environmentally responsible behaviors. Additionally, as part of our [Vendor Code of Conduct](#), we convey our environmental requirements and standards to our suppliers and service providers.

6. Implementation

This policy is based on well-established national and international standards and norms. We aim to consistently apply it across our business operations. We hold all Collegium employees, business partners, and consultants/contractors accountable for adhering to this policy. This policy will be assessed and/or revised based on new or ongoing regulatory environment.

DocuSigned by:

Scott Sudduth

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Approved by Scott Sudduth, EVP, Head of Technical Operations

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Sanga Emmanuel

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Approved by Sanga Emmanuel, Chief Compliance Officer

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