



COLLEGIUM VENDOR CODE OF CONDUCT

PURPOSE

- At Collegium Pharmaceutical, Inc. we maintain uncompromising integrity in everything we say and do, and we are committed to doing business in compliance with all applicable legal and ethical standards. To execute our mission of improving the lives of people living with serious medical conditions, we rely on relationships with third-party vendors and we expect our vendors to operate with the same high legal and ethical standards.

VENDOR STANDARDS

When doing business with or on behalf of Collegium, we expect vendors to adhere to the following standards:

Environmental

- **Environmental Compliance:** Vendors shall adhere to all applicable environmental laws, including all laws related to waste discharge, air emissions, toxic substances, hazardous materials usage and ensure lawful disposal of those materials.

Human Rights

- **Non-Discrimination:** Vendors shall not subject employees and/or contractors to discrimination of any kind based on race, religion, age, nationality, gender, disability, sexual orientation, trade union membership, political affiliation or any other status protected by law.
- **Abuse, harassment and disciplinary action:** Vendors shall provide a work environment free of abuse and harassment. No workers shall be subject to mental or physical abuse, threatening language or actions or exploitative or sexually coercive behavior. Written disciplinary rules and procedures must be fair, reasonable and validated by local government authority. Furthermore, workers' grievances must be dealt with in a fair and appropriate manner.
- **Freedom of association and collective bargaining:** Vendors shall, as and to the extent required by applicable law, acknowledge employees' right to form and join trade unions, employee representative organizations or any other employee associations freely and lawfully without interference by vendors.

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- **Child labor:** Vendors shall not use child labor. Vendors shall not engage employees below the legal minimum age as required by local law. Vendors agree to verify the age of their employees and maintain documented proof of their employees' ages.
- **Voluntary labor:** Vendors shall not engage in forced labor. All work is voluntary and not performed under threat of penalty or coercion. Forced labor, including slave, bonded, trafficked, indentured or prison labor, is prohibited.
- **Working hours:** Vendors shall communicate overtime requirements to employees and shall comply with all local legal requirements regarding overtime and time-off. Work hours should not exceed the legal maximum under local law.
- **Wages and Benefits:** Vendors shall compensate all workers with wages, including overtime premiums that meet legal standards and provide legally required insurance and benefits as mandated by local law. Deductions from wages as a disciplinary measure are not permitted.

Health and Safety

- **Safe working conditions:** Vendors shall maintain a safe, hygienic and healthy work environment in compliance with all applicable laws and regulations. Adequate measures are taken including training on chemical/fire/machine safety and first aid, warning signs posted, properly marked exits, fire drills, evacuation plans and fire-fighting equipment required by local laws is properly installed, well maintained and regularly checked.

Ethics

- **Conflicts of Interest:** Vendors shall perform reasonable measures to avoid situations that present, or create the appearance of, a conflict between their interest and their obligations to Collegium.
- **Anti-Bribery and Anti-Corruption:** Vendors shall not engage in bribery and shall have systems in place to ensure compliance with all applicable laws. Vendors are expected to comply with Collegium's Anti-Bribery & Anti-Corruption Policy as well as the Code of Ethics.
- **Anti-Counterfeiting:** Vendors shall not knowingly purchase or otherwise acquire counterfeit, illegally diverted or stolen products. If the vendor is offered to purchase or becomes aware of counterfeit, illegally diverted or stolen products in their supply chain that may affect the goods or services the vendor renders to Collegium, the vendor will notify Collegium immediately.
- **Fair Competition:** Vendors shall conduct business in compliance with all applicable anti-trust

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laws.

- **Data Privacy and Security:** Vendors shall protect and make only proper use of confidential information to protect the privacy rights of the company, workers, patients and any other parties engaged in conducting business with or on behalf of Collegium. Vendors shall comply with applicable privacy and data protection laws.

To ensure that we conduct business with vendors who share our commitment to integrity, we:

- Perform background checks on all potential vendors.
- Screen all potential vendors against the Office of Inspector General List of Excluded Individuals/Entities (LEIE) to ensure vendors have not:
 - Been convicted of criminal offenses such as Medicare or Medicaid fraud, patient abuse or neglect, other health care-related fraud, theft, financial misconduct, or unlawful manufacture, distribution, prescription or dispensing of controlled substances.
 - Had a license to provide health care services suspended, revoked or surrendered for reasons bearing on professional competence, professional performance or financial integrity.
 - Submitted false or fraudulent claims to a Federal health care program.
 - Engaged in unlawful kickback arrangements.
 - Defaulted on health education loan or scholarship obligations; or
 - Controlled a sanctioned entity as an owner, officer or managing employee.
- Screen all potential vendors against the Office of Foreign Assets Control (OFAC) Sanctions List to ensure vendors have not been convicted of a felony related to the development or approval, including the process for development or approval, of any abbreviated drug application; or for conduct related to development or approval of any drug product, or otherwise related to any drug product under the Federal Food, Drug and Cosmetic Act.
- Screen all potential vendors against the Food and Drug Administration (FDA) Debarment list to ensure vendors have not been forbidden from working in the drug industry.
- Verify that potential vendors have not been criminally indicted or convicted of misdemeanor

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or felony offenses.

- Verify that potential vendors have not received State or Federal sanctions.

Vendors are required to comply with this Vendor Code of Conduct as a condition of doing business with Collegium. If at any time Collegium has reason to believe that a vendor is operating in violation of or contrary to the Vendor Code of Conduct, Collegium reserves the right to assess vendors' compliance with this Vendor Code of Conduct through use of Collegium personnel or third parties and may provide a written notice to the Vendor requesting immediate remedial action. Such non-compliance may affect the vendor's relationship with Collegium, including the ability to conduct business in the future.

For questions or to report a violation of this Vendor Code of Conduct, please contact our Compliance department at compliance@collegiumpharma.com. If you wish to remain anonymous, call the Collegium Ethics Hotline at 1-844-764-2360 or report through the web portal at compliance.collegiumpharma.ethicspoint.com.

IMPLEMENTATION

Compliance Department

Collegium's Compliance Department will implement a general employee training including:

- Periodic distribution of the Vendor Code of Conduct and its accompanying or applicable principles.

Legal Department

Collegium's Legal Department will ensure that the Vendor Code of Conduct is:

- Incorporated by reference into Collegium's standard contractual agreements, to the fullest extent possible where applicable.

REFERENCES

For further guidance or additional information see:

- [Collegium Code of Ethics](#)
- [Collegium Anti-Bribery & Anti-Corruption Policy](#)

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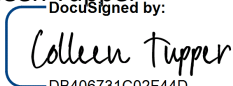
HISTORY

- Version 1.0 – February 2023

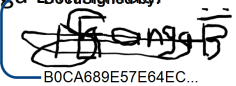
DEPARTMENT RESPONSIBILITIES:

OWNING, APPROVING AND STAKEHOLDER DEPARTMENT(S):

Department: Finance

- Name: Colleen Tupper
DocuSigned by:
- Signature: 
DB406731C02F44D...
- Title: Chief Financial Officer
- Date: 2/17/2023

Department: Compliance

- Name: Sanga Fransman
DocuSigned by:
- Signature: 
B0CA689E57E64EC...
- Title: Chief Compliance Officer
- Date: 2/17/2023

Department: Legal

- Name: Shirley Kuhlmann
DocuSigned by:
- Signature: 
B33AEEF061A8403...
- Title: General Counsel & Chief Administrative Officer
- Date: 2/17/2023

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