



COLLEGIUM HUMAN RIGHTS STATEMENT

PURPOSE

- Respect for human rights is a fundamental value of Collegium Pharmaceutical (“Collegium”).
- We are aware that, as a business enterprise, we are a member of society and can contribute to creating an environment in which human rights are respected. Meeting the responsibility to respect human rights is key to operating as a responsible business and is a baseline expectation for all companies. We strive to respect and promote human rights in our relationships with our employees, customers, suppliers and vendors. Our aim is to help increase the enjoyment of human rights within the communities in which we operate.
- Our employees are guided by our core values of Uphold Integrity; Embrace Differences; Be Accountable; Encourage Expression. These are the foundational beliefs of our organization and shape our culture and define how we work together.
- This Human Rights Statement is aligned with Collegium’s Corporate Code of Ethics; its Equal Employment, Non-Discrimination, and Harassment policies; and its Workplace Violence policy.
- This Human Rights Statement is guided by international human rights principles encompassed by the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

SCOPE

- This statement applies to Collegium, its employees and its subsidiaries and affiliates. Collegium also expects its vendors and suppliers to uphold these principles and urges them to adopt similar policies within their own businesses.
- The Human Rights Statement is overseen by the Chief People Officer.

KEY PRINCIPLES

Diversity and Inclusion

At Collegium, we believe each employee’s unique experiences, perspectives and viewpoints add value to our ability to positively impact the lives of people suffering from pain and the communities

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we serve. We strive to create and maintain a diverse workforce and an inclusive culture by Embracing Differences and Encouraging Expression. We aim to foster a stronger, smarter and more informed organization.

- We believe that all human beings are born free and equal in dignity and rights. We value and advance the diversity and inclusion of the people with whom we work, and we treat with dignity and respect not only our employees, but those with whom we do business – including our customers, suppliers, partners and competitors.
- We are committed to equal opportunity and are intolerant of discrimination and harassment. We strive to ensure equal pay for equal work. We work to maintain workplaces that are free from discrimination or harassment on the basis of age, national origin, citizenship status, ancestry, race, color, religion, creed, sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or expression (including transgender status), sexual orientation, military or veteran status, physical or mental disability, genetic information or any other status protected by applicable federal, state or local law. This statement applies to hiring, training, promotion, compensation, disciplinary measures, access to facilities and programs, and all other personnel actions and conditions of employment.
- We do not tolerate disrespectful or inappropriate behavior, discrimination or retaliation of any kind. Harassment is not tolerated in the workplace or in any work-related event outside the workplace.

Safe and Healthy Workplace

We manage our facilities and conduct our operations in a manner intended to protect the health and safety of our employees, customers, contractors and any other visitors. Our policy is to comply with all applicable safety and health laws and regulations.

- We are committed to maintaining a workplace that is free from violence, harassment, intimidation and, to the extent possible, other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

Forced Labor and Human Trafficking

We are committed to preventing and prohibiting forced labor of any kind, including all forms of modern-day slavery or human trafficking, child labor, prison labor or indentured labor.

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Guidance and Reporting for Employees

We strive to create workplaces in which open and honest communication among all employees is valued and respected. Collegium is committed to complying with applicable labor and employment laws wherever we operate.

- Any employee who has questions about this Statement or would like to confidentially report a potential violation of this Statement should raise those questions and concerns with their supervisor, Human Resources or Compliance (compliance.collegiumpharma.ethicspoint.com) or toll-free (844) 764-2360. Employees may also utilize the Compliance email address to report a concern at Compliance@Collegiumpharma.com. No reprisal or retaliatory action will be taken against any employee for raising concerns in good faith under this Statement. Collegium will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any confirmed violation.
- Collegium reserves the right to amend this statement at any time. Nothing in this statement says or implies that a contract exists between Collegium and its employees or provides any guarantee of continued employment with Collegium.

IMPLEMENTATION

Compliance Department

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

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

Department Management

Management of each Department or other organizational unit must:

- Ensure that this Statement is embedded in their business activities and adhered to.
- Train, oversee and supervise employees in accordance with the principles articulated in this Statement, as applicable.

REFERENCES

For further guidance or additional information see:

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- Collegium’s Code of Ethics
- Collegium’s Equal Employment, Non-Discrimination, Harassment and Workplace Violence Policies

HISTORY

- Version 1.0 – February 2023

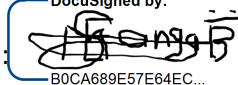
DEPARTMENT RESPONSIBILITIES:

OWNING, APPROVING AND STAKEHOLDER DEPARTMENT(S):

Department: Human Resources

- Name: Kelly Clements
- Signature: Kelly Clements
- Title: Chief People Officer
- Date: 2/16/2023

Department: Compliance

- Name: Sanga Emmanuel
- Signature: 
- Title: Chief Compliance Officer
- Date: 2/16/2023

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