

GLOBAL CODE OF BUSINESS CONDUCT



INTRODUCTION

Dear Colleagues,

Curium's current and future success is based on living our values. At the foundation of these values is total integrity, highest ethical standards and compliance with all applicable laws, regulations and rules.

We operate in a heavily regulated industry. Many behaviors, actions or inactions can damage our company's name, reputation or credibility. Therefore, all of us who represent Curium in any position or capacity should be personally committed to comply with our Global Code of Conduct and spread within our organization a culture in which integrity and compliance with this Code is constant and a priority. Unethical or dishonest behavior cannot be tolerated.

This Global Code of Business Conduct is a complement to applicable laws or local rules, policies or regulations. In each and every situation, the less permissive/the stricter provision shall apply.

Thank you for all you do for Curium, your colleagues, our customers and their patients.

Who is covered by this policy?

The Global Code of Business Conduct, applies to everyone working for and on behalf of Curium; employees, consultants, distributors and agents.

We expect all of our business partners and suppliers to uphold the same standards.

What is expected of me?

It is your responsibility:

- to read and understand the Code of Conduct and to keep yourself updated on our company's policies,
- to follow the standards expressed by the Code of Conduct in your day-to-day work,
- to seek guidance and training when you have questions or doubts about the Code of Conduct,
- to be alert to actions by employees or third parties that do not comply with our Code of Conduct,
- to speak up if you become aware of violations of the Code of Conduct and,
- to cooperate fully and transparently in all compliance related matters and reviews.

How to report a suspected violation of the Code of Conduct?

As a Curium employee, you are expected to report any conduct you believe in good faith to be a violation of the Code of Conduct or the law. By reporting compliance concerns you are acting in the spirit of our Code and helping to protect our business and our reputation. If you have compliance concerns, it is generally best to talk to your manager who will further report the concern to the Compliance Office. You can also report your concerns anytime with a manager of higher rank, Human Resources or directly to the Compliance Office depending on the nature of the concern. You must feel comfortable raising concerns with no fear of retaliation.

Emails sent to the Compliance Office (Compliance.Office@curiumpharma.com) will arrive correctively to the Group General Counsel, the US General Counsel and to the EU and International General Counsel.

Q&A

Q: I have a concern about the actions of a colleague. How should I report this?

A: The most important thing is to raise your concern – it does not matter which route you choose. If you feel comfortable talking to your manager, do that. Your manager is there to support and help you choose the correct course of action. You can also simply refer by email to Compliance.Office@curiumpharma.com and one of the three persons listed above will make direct contact with you.

Q: Can I remain anonymous?

A: If reported to the Compliance Office, the confidentiality of the report may on request be ensured.

I. Selling our Products

1.1. Quality and regulatory excellence

We ensure compliance with laws and regulations and work closely with regulators. Our fundamental responsibility is to provide safe and effective products for customers and patients. As a global company operating in one of the most highly regulated industries, we face an increasing variety of laws and regulations in every market where we operate. Our success depends not only on compliance with the laws and our own procedures but also on avoiding any suggestion of having violated such laws or procedures. Our products are developed, manufactured, marketed, sold and serviced in accordance with quality-controlled processes and procedures. As a company employee, or if you act on behalf of Curium in any way, you must fully understand and comply with all quality and regulatory processes and procedures that are relevant for your work.

Q&A

Q: In many countries we rely on the distributor's view about the need for regulatory approvals. How do we ensure that these views are accurate?

A: Consult the Quality and Regulatory group to verify what is required in a specific country and/or region. If regulatory approvals are required, make sure the products have the necessary approvals. If the products do not have the necessary approvals, submit a request to initiate a regulatory submission.

Q: How do we know if a certain product has received a marketing authorization in a specific country or region?

A: You must work with your local Quality and Regulatory team to verify that the product has a valid certificate for the intended country/region.

1.2. Avoiding bribery and corrupt dealings

Our business dealings are heavily regulated by laws. Breaking these laws can result not only in significant fines but also in criminal penalties for the company and us as individuals. These laws prohibit bribery and other corrupt dealings, such as kickbacks, that may improperly influence the decisions or actions of others. Improper actions are prohibited, whether carried out directly by a company employee or indirectly through a third party such as a distributor, agent or consultant. Everyone working for or on behalf of Curium is expressly prohibited from offering anything of value in an effort to unduly influence others in business dealings. This applies to every country around the world and to interactions with both governments and the private sector. Opportunities that are subject to making improper payments must be turned down. Curium also prohibits accepting anything of value from any person or company when it is designed to influence an action or obtain an improper advantage. Everyone working for or on behalf of Curium must follow all applicable laws and regulations pertaining to interactions with government officials and health care professionals. **Please refer to Curium's Anti-Corruption Policy attached hereto as EXHIBIT A for more details.** In case of doubt, always contact the Compliance Office.

Q&A

Q: From time to time I provide meals, gifts, travel and entertainment to customers. Is this appropriate?

A: Providing business courtesies can be an appropriate way of doing business, but only under the right circumstances. There are a variety of laws that govern business courtesies. These laws are complex, differ from country to country and can have serious repercussions for our company. Before offering or providing a business courtesy, make sure it satisfies all the guidelines and requirements in Curium's Anti-Corruption Policy.

Q: I have a suspicion that one of Curium's distributor sales representatives has been making improper payments to an end customer. I do not think anyone at Curium was involved. Should I report this?

A: Absolutely. Both Curium and our employees can be held liable for the actions of third parties, even if we were not directly involved. Report this to the Compliance Office immediately.

Q: A Curium distributor has asked for an additional product discount above and beyond our regular discount due to unexpected government fees. Do we need to look into this?

A: Yes, we must clearly understand what additional fees the distributor is being asked to pay. This makes good business sense and helps ensure these are valid charges that cannot be viewed as a bribe.

1.3. Interactions with health care professionals

Building long-term relationships with our customers is critical for our success. We achieve this by establishing Curium as a trusted partner who can always be counted on to act openly and honestly. This applies especially in our interactions with health care professionals* who can influence customer decisions about our products and services. We must ensure these interactions are guided by the highest standards of integrity. We may only engage the services of health care professionals when there is a legitimate business need and value for Curium and must never pay more than an appropriate market rate for services rendered. Providing something of value to a health care professional in return for a favourable decision or other business advantage is prohibited. Anything of value offered or provided to health care professionals must be made openly and properly

documented and must comply with all applicable laws (which may impose a prior approval or reporting process).

*Health care professionals refers to individuals (and the institutions for which they work) involved in the decision-making process resulting in, for example, the procurement of our products or services. This may include, for example, doctors, nurses, hospital managers, administrators, and even consultants employed by hospitals.

Q&A

Q: We will host an international conference and would like to hire a doctor to make a speech. Is that okay?

A: Yes, as long as there is a genuine need for the speech and the compensation is consistent with fair market value. There should be no real or perceived connection to the purchase of Curium products. The services should be properly documented and may need to be disclosed to the doctor's institution and reported to the government according to local laws and procedures. Consult the Legal Department for guidance.

Q: A customer has asked Curium to make a charitable donation to a non-profit charity and indicated that such a donation would help secure Curium as a vendor of choice. Can Curium make the donation?

A: No. Even if the donation were used by the charity for a legitimate charitable purpose, donating Curium money in return for preferential customer treatment would not be appropriate and would violate the law.

1.4. Competing fairly

Competition or antitrust laws ensure a true and free competition with our competitors, on an equal footing with no unfair advantages. These laws are based on the principle that a competitive marketplace promotes consumer welfare and efficiency. Competition laws are very complex, global in reach and can operate differently in a particular situation. It is very important that you work closely with the Legal Department to make sure we are not inadvertently engaging in anti-competitive activities. Further details on our duty to compete fairly are contained in **the Curium Antitrust Compliance Policy set out in EXHIBIT B.**

Q&A

Q: I will be meeting a competitor at a conference next week. Am I allowed to talk about a deal I know we're both bidding on?

A: No. Any exchange of information that might manipulate the normal competitive conditions of the market in question, or coordinate the activities of competitors, can be viewed as a violation of competition law. Sharing sensitive business information is unacceptable.

1.5. Honoring international trade obligations

As a global company, our business relies on moving people, products, technology and information all around the world every day. These activities are regulated by international trade laws that place different restrictions on our activities depending on factors such as the place of origin, content,

destination, end use, and the parties involved. In some cases, even the exchange of information across national boundaries, whether by email, phone or web access, is restricted. All Curium products and technology must be transferred in accordance with the import and export law requirements of the countries in which we operate. All parties involved in our transactions, including the end users of our products, must be screened to ensure that we can do business with them. In each case, employees involved in trade or export activities on behalf of Curium must ensure that all documentation for import, export and tax purposes is complete and accurate. Further details on our duty to comply with international trade obligations are contained in the **Curium Trade Compliance Policy set out in EXHIBIT C.**

Q&A

Q: A customer has asked me to prepare two invoices – a sales invoice with the actual price and a separate shipping invoice reflecting a lower price. Is this ok?

A: No. Documentation prepared for shipping purposes is used by government agencies in several ways, including determining tax and customs duties. These records, like all records for Curium, must be complete and accurate in all respects.

Q: I am invited to a customer meeting in Iran as a Curium product specialist but have been informed that certain conditions need to be fulfilled for me to travel to Iran as a US citizen. That sounds complicated. I also hold a UK passport. Could I just travel to Iran using my UK passport?

A: No. Using your UK passport does not eliminate your obligations to comply with US export law as a US citizen.

II. Protecting our Funds and Assets

2.1. Handling conflicts of interest

A conflict of interest arises when a Curium employee's loyalties or actions are divided between Curium's interests and the interests of themselves or another, such as a competitor, supplier or customer. Every decision and financial commitment we make as employees must promote the goals and objectives of Curium. Curium employees may engage in legitimate and lawful financial and other activities outside working hours so long as those activities do not create a conflict with or otherwise harm Curium's interests. There are many possible scenarios that can create a conflict of interest – some of which may not be obvious. These are some examples:

- Accepting personal gifts or entertainment from competitors, customers or suppliers
- Working for competitors, suppliers or customers, or holding significant shares in any such entities
- Engaging in any work in competition with Curium
- Employing close relatives, especially when those relatives report directly or indirectly to the Curium employee
- Using a supplier in which your close friend or relative has a significant financial interest or plays a significant role

Q&A

Q: My friend is the managing director of a company under consideration as a new Curium supplier. I know that his company is doing excellent work and really needs this contract. What should I do?

A: To avoid any conflict of interest, you should immediately inform your manager that you have a close personal connection to the supplier and should not be involved in evaluating your friend's company.

Q: Are there any guidelines to help me avoid potential conflicts of interest in interactions with suppliers with whom I have become close?

A: You can ask yourself these questions to determine whether the relationship with the supplier can expose you to a conflict of interest, or the appearance of a conflict: • Is it a personal friendship or a friendly professional relationship? • Do you fear that your personal loyalty may compromise your ability to objectively evaluate the supplier and make decisions in Curium's best interest? Discuss with your manager to avoid any potential or appearance of a conflict of interest.

Q: What should I do if I receive a personal gift from a supplier in a country where refusing business gifts can be seen as an insult?

A: In situations where rejecting the gift is culturally impolite and can damage the relationship, you should accept the gift on behalf of Curium and turn it over to your manager for proper disposition by Curium. If unsure, consult the Compliance Office for guidance.

2.2. Proper use of our funds and assets

We need to manage and protect our assets and information to safeguard our business and reputation. Curium's assets cover a range of property which includes information and computers, telephones, software, product plans, strategy documents and similar items, all of which are key to the success of our company. Everyone entrusted with Curium property is responsible for its protection and correct use.

INTELLECTUAL PROPERTY Intellectual property is one of our most valuable assets, which differentiates us from our competitors. You must be vigilant in safeguarding our patents, trademarks, copyrights, trade secrets, know-how and all other proprietary information. Any unauthorized use of these could harm our business.

RESTRICTIONS ON USE OF COMPANY FUNDS The use of company funds must be appropriately and officially approved beforehand. As an employee, you must adhere to Curium's policies relating to signatory rights and authorization of invoices and expenses. Special care needs to be taken concerning gifts and hospitality, charitable donations and sponsorships. You must always follow the applicable procedure for these activities, as they may be inappropriate or even illegal depending on the circumstances.

CONFIDENTIAL INFORMATION Employees and other persons working for Curium must protect confidential information from improper disclosure, and communication of confidential information shall be limited to individuals who need it in order to carry out their work. Confidential information obtained from others must be treated in the same way as we expect them to treat information received from us and in accordance with the terms applicable to its disclosure. Any unsolicited third-party proprietary information should be refused. If you inadvertently receive such information, notify the Legal department immediately.

BUSINESS COMMUNICATION TOOLS AND SOCIAL MEDIA Take special care to use the business communications tools primarily for business purposes and in line with applicable policies

and guidelines. Do not use internal open social media channels to share confidential, personal or commercial information about Curium, its customers or third parties. When you speak about yourself in external social media, you must not spread any Curium information that is not intended for the public. Nor should social media be used in a way that could harm Curium's brand or reputation.

COMMUNICATING ON BEHALF OF CURIUM Only authorized representatives may communicate externally on behalf of Curium, including via social media. Any request from third parties (analysts, banks, journalists, press agencies etc.) must be answered by a "No Comment" and the request directed to the Legal Department or the Group CFO.

Further details on the management of information are contained in the Curium Information Policy set out in EXHIBIT D.

Q&A

Q: I have just joined Curium from a competitor and brought with me lots of information which I think could be useful to share. Is this OK?

A: No. You are not allowed to share information if it is of a confidential nature. Sharing this information would expose Curium to risk as well as cause harm to your former employer.

Q: One of our customers has heard rumours about our new product under patent application. What can I tell the customer?

A: You should consult with the Legal department before discussing the new product with the customer. Discussing a pending patent application may jeopardize Curium's right to obtain the patent.

2.3. Financial information and communication with media and investors

FINANCIAL INTEGRITY In order to maintain the investors' trust and fulfil our accountability with the financial market, we must record all transactions promptly, accurately, completely and honestly in accordance with applicable internal and external financial and accounting principles, standards and regulations. We never alter or manipulate source documents, accounting entries or financial statements to achieve a forecasted or desired result.

EXTERNAL COMMUNICATION AND FINANCIAL DISCLOSURE All our communication, through whatever channel, shall be truthful, reliable, timely and appropriately authorized. Everyone working for Curium must be mindful of situations in which they may be perceived to be communicating on Curium's behalf and refer questions to the Legal Department. All financial communication from Curium shall be accessible and up-to-date, based on officially published market figures and company messages, and supported with correct and relevant facts and circumstances.

Q&A

Q: I was asked to sign my name on a sales contract using a date from two weeks ago. This does not seem right. What should I do?

A: Falsifying information in company documents, like contracts, can lead to the improper recording of transactions in violation of accounting rules and financial regulations. No employee should ever

prepare or sign a document in a manner that misrepresents the underlying facts. You should contact the Legal department for guidance on specific contract-related questions.

Q: I incur business expenses infrequently and, whenever I do, the amounts are not very large. Do I need to worry about coding the expenses properly when I submit my expense report?

A: Yes. Each Curium employee must make sure the Curium books and records they create – including internal expense reports – honestly and accurately reflect the underlying transaction or expenditure. No employee may allow a record to be entered that is inaccurate, incomplete or misleading.

Q: A friend who is a financial journalist asks about Curium’s financial performance and rumours that we are about to close an important acquisition. Am I allowed to give my personal opinion about that project?

A: Be careful to not to talk on behalf of Curium. When you share your personal opinion about Curium’s performance among friends, make sure you do not share confidential or proprietary information. Sharing information about a transaction, even after disclosure to the public, would be sharing confidential information. Be very cautious if you engage in any discussion about Curium as you may reveal more information than you intended to a trained journalist.

2.4. Promoting global sustainability

SUSTAINABILITY for Curium means to act in an ethical, social and environmentally responsible manner at all times in combination with maintaining sound financial results and good governance. The principles in our Code of Conduct are all cornerstones in building a sustainable company for the future.

HIGH STANDARDS ON SUPPLIERS As described in this Code of Conduct, we have set high standards on the way we do business and we expect the same from our suppliers in their own businesses and their business relationships. In many cases, suppliers have implemented their own codes, and these should be in line with, and comply with, our standards as a prerequisite to doing business.

REDUCING ENVIRONMENTAL IMPACT We are committed to reducing the environmental impact of all operations in the company and of our products and solutions. We strive to effectively utilize all types of resources needed when products and processes are developed and implemented, for example, energy, natural resources and raw materials. We also aim to minimize waste and emissions to air and water, and recover or recycle materials, water and energy wherever possible. We avoid materials and methods that may cause health or environmental risks and avoid the use of hazardous materials whenever possible.

Q&A

Q: What can I personally do to contribute to reducing our environmental impact?

A: You can, for example, avoid unnecessary travel, which will also save time and money. When there is an option, choose the train instead of a car.

Q: What should I do if I suspect that an existing supplier has different standards than Curium (for example releasing waste into a lake or using materials or methods that may put employees at risk), when it comes to sustainability and the Code of Conduct?

A: Complying with the standards as to environment and health and safety, among other principles, is a prerequisite to doing business with Curium. You should bring this to the attention of the Compliance Office so that Curium can enforce the supplier's contractual commitment to our Code of Conduct.

Q: Can I select or reject a supplier based on their environmental performance?

A: A company's environmental performance is part of the total supplier assessment. If the environmental performance of a supplier is not consistent with our requirements, this could be a reason to reject the supplier. The first approach should however be to work with the supplier to enhance their performance. By doing this, we are contributing to a more sustainable future.

III. Working With Each Other

3.1. Protecting human rights and celebrating diversity

Our employees are our most valuable resource. It is our responsibility to ensure we provide a sustainable working environment with fair terms and conditions for everyone working for us.

HUMAN RIGHTS We respect and work in line with internationally proclaimed human rights and ensure that we do not abuse any part of the human rights principles.

NO DISCRIMINATION A respectful work environment means that harassment (physical or verbal), discrimination or bullying are unacceptable. We must all treat each other with respect, dignity and common courtesy. No employee should be discriminated against due to e.g. age, race, gender, religion, sexual orientation, marital status, social origin, political opinion or ethnic background.

DIVERSITY We believe a diverse workforce and an inclusive and respectful work environment are essential components of a thriving, innovative and sustainable business. As a truly global company we want to attract employees from a wide range of backgrounds and cultures to better understand and match our customers' needs in different countries. Our workplace is built on respect for each other, honesty and integrity and we celebrate the diversity of all employees and partners represented by this global company.

FAIR EMPLOYMENT AND REMUNERATION We embrace fair employment practices where all employees have the same opportunities for a job based on qualification and merit, for example, education, prior experience, skills, performance, values, leadership and other relevant criteria. The aim is to ensure that all employees with the same experience and qualifications receive equal pay for equal work. Everyone who works for Curium should have the right to fair wages according to local conditions and contractual working time including time to rest, overtime and holidays. Curium does not accept the use of forced or compulsory labour, or child labour.

FREEDOM OF ASSOCIATION We recognize and respect the freedom of our employees to be a member of any employee organization of their own choosing. Where employees are represented by

a legally recognized trade union, we establish a constructive dialogue and engage in negotiations or consultations as required with their representatives.

If you believe that you or others have been subject to unlawful discrimination or harassment, report the incidents and circumstances to your manager, an HR manager, other senior managers or the Compliance Office.

Q&A

Q: A colleague is recruiting a new team member. I am concerned that they may be discriminating against my female colleague who is pregnant but interested in the job. What can I do?

A: You are right to raise your concern as we will not tolerate any form of discrimination. You should first of all urge your colleague to discuss the selection criteria with the HR manager. If there is no change, then you should raise the issue with your manager, another senior manager or the Legal Department.

3.2. Healthy and safe work environment

Curium is committed to creating and maintaining a safe working environment at all sites and preventing workplace accidents and injuries. All necessary precautions for a safe and sound work environment must be met regardless of whether you work at an office or a manufacturing site. Therefore, health and safety aspects must always be considered, for example in the design and production of new products and services, when introducing a new activity or way of working, or adopting a new office or site. Everyone with a job that requires specific safety instructions and protection will receive all necessary training prior to starting the work and the workplace must be equipped with adequate protection materials and tools. We do not tolerate the abuse of drugs or alcohol in the workplace.

Q&A

Q: What should I do if I suspect that a colleague is operating equipment under the influence of alcohol or drugs?

A: You should let your colleague know that this is not appropriate, and you should also report this incident to your line manager or the Human Resources department.

3.3 Safeguarding personal information and patient data

Trust, including responsibility for the privacy of individuals, is at the heart of our business and a long-standing Curium value. Curium is committed to protecting the privacy and confidentiality of any personal information to which we gain access in the course of our business. Any collection or processing of personal information must be for specific and legitimate business purposes with due consideration to principles of proportionality and transparency. We value personal information entrusted to us and we work hard to protect it. Personal information of employees, customers or patient information is confidential and must be kept accordingly. When you are involved in accessing or processing personal information, you must familiarize yourself and comply with relevant legal and contractual requirements. Consult the Compliance Office if you need guidance.

Further details on the management of information are contained in the Curium Information Policy set out in EXHIBIT D.

Q&A

Q: What is “personal data protection” and why do we need to be concerned about it?

A: While the exact definition varies from country to country, generally personal data is any information relating to an individual – a name, a photo or an email address for instance. In the online environment, where vast amounts of data are instantly transferred around the world, it is increasingly difficult for individuals to maintain control over their personal information. Almost everything we do online allows for the collection of data. In many countries, including in the EU, data protection is a fundamental right that trumps other interests. Additionally, there are very restrictive regulations for protected health information, such as the United States HIPAA regulations for protected health information. Employees accessing a US customer’s protected health information from outside of the United States are bound to HIPAA regulations, which include having documented evidence of HIPAA training.

Q: What if there is a business need to share personal information with third parties?

A: Provided there is a legitimate business need for doing this, you must ensure that the third party can protect the personal information properly and will use it only to provide services to us. Make sure there is an appropriate contract in place that addresses protection of personal information and ensure compliance with local regulations, which may include mandatory notification to authorities regarding personal data sharing.

Q: I have been diagnosed with an ongoing medical condition. How do I ensure this information is kept confidential and only given to people who really need it?

A: There is a balance between the employer’s need for information and the employee’s right to respect for their private life. You may ask your Human Resources contact to provide assurance that the health information is being kept in a specially protected manner and that access to this information is limited to managers or human resource personnel that genuinely need it to carry out their job.

EXHIBIT A: CURIUM ANTI-CORRUPTION COMPLIANCE POLICY

I. Introduction

Curium Bidco Sàrl, its affiliates (collectively, “Curium” or the “Company”) and its management is committed to conducting all aspects of its business in keeping with the highest legal and ethical standards and expects all Curium Personnel and other persons acting on its behalf to uphold this commitment. In accordance with this commitment, Curium has adopted this Anti-Corruption Compliance Policy (the “Policy”), which is applicable to all directors, officers, Curium Personnel, agents, distributors, representatives and other associated persons of Curium (collectively “Curium Personnel”). This policy constitutes an integral element of Curium’s overall antitrust culture and ethical standards.

In brief, Curium will not tolerate bribery, kickbacks, or corruption of any kind, directly or through third parties, whether or not explicitly prohibited by this Policy or by law. Curium Personnel are not permitted to give or offer anything of value (including gifts, hospitality, or entertainment) to anyone for the purpose of improperly obtaining or retaining a business advantage. Similarly, Curium Personnel may not solicit or accept such improper payments.

This Policy and the internal controls herein have been designed to prevent bribery from occurring, avoid the appearance of wrongdoing and enable Curium to respond promptly and effectively to any inquiries about its conduct. The pages that follow provide a general guide to anti-corruption compliance but do not address every potential scenario that may implicate issues bearing on compliance with this Policy. Therefore, any Curium Personnel who have any questions concerning the requirements of this Policy should consult with the Compliance Office.

A. Curium Personnel shall not be permitted to pay or receive bribes.

Curium Personnel must conduct their activities in full compliance with this Policy, the laws of the Country where located and all applicable anti-corruption laws, including local anti-corruption laws, the UK Bribery Act and the United States Foreign Corrupt Practices Act (“FCPA”).

Under this Policy, Curium Personnel are not permitted to give or offer anything of value, directly or indirectly, to any Government Official or any commercial party for the purpose of improperly obtaining or retaining a business advantage. “Anything of value” should be broadly interpreted to include cash, gifts to family members, forgiveness of a debt, loans, personal favors, entertainment, meals and travel, political and charitable contributions, business opportunities and medical care, among other items. Simply put, bribes, kickbacks or similar payments are never permitted, whether made to a Government Official or to customers, investors, clients or other private parties. Similarly, Curium Personnel may not solicit or accept such payments.

If confronted with a request or demand for an improper payment or other violation of this Policy, the request or demand must be immediately rejected and reported to Curium’s Compliance Office. Similarly, if any employee or agent knows or believes that an improper payment has been or will be made, the employee or agent must also report such payment to Curium’s Compliance Office. Curium’s policy is that no adverse employment action will be taken against any Curium Personnel in retaliation for, honestly and in good faith, reporting a violation or suspected violation of anti-corruption laws or this Policy.

B. Curium Personnel have received, read and fully understood the Company's Anti-Corruption Policy (the "Policy")

Curium Personnel should comply with all the rules contained therein and to report any potential violations to Curium Compliance Office. Curium Personnel should abide by and participate in any Company's Anti-Corruption training. Curium Personnel must understand that failure to comply with the FCPA, UK Bribery Act and any other applicable anti-corruption laws may result in prosecution, with penalties including fines and/or imprisonment.

This Policy sets forth various rules relating to gifts, entertainment, travel, meals, lodging and employment. All such expenditures must be recorded accurately in the books and records of the Company, in accordance with Section IV below.

a. Gifts

As a general matter, Curium competes for and earns business through the quality of its Curium Personnel, products and services, not with gifts or lavish entertainment. The use of Curium funds or assets for gifts, gratuities, or other favors to Government Officials or any other individual or entity (in the private or public sector) that has the power to decide or influence the Curium's commercial activities is prohibited, unless **all** of the following circumstances are met.

- the gift does not involve cash or cash equivalent gifts (e.g., gift cards, store cards or gambling chips);
- the gift is permitted under both local law and the guidelines of the recipient's employer;
- where applicable, the gift has been approved or notified to the competent local authorities;
- the gift is presented openly with complete transparency;
- the gift is properly recorded in the Company's books and records;
- the gift is provided as a token of esteem, courtesy or in return for hospitality and should comport with local custom; and the item costs less than EUR 200 or USD 200 and no gift in aggregate should exceed a value of EUR 500 or USD 500 for one single party over a period of six months.

Gifts that do not fall specifically within the above guidelines require advance consultation and approval by the Compliance Office.

Note that the provision of gifts, as well as the reporting requirements, in this Policy, apply even if Curium Personnel are not seeking reimbursement for the expenses (i.e. paying these expenses out of your own pocket does not avoid these requirements).

Curium Personnel must not accept or permit any member of his or her immediate family to accept any gifts, gratuities or other favors from any customer, supplier or other person doing or seeking to do business with Curium, other than items of nominal value. Any gifts that are not of nominal value should be returned immediately and reported to your supervisor. If immediate return is not practical, they should be given to Curium for charitable disposition.

b. Meals, Entertainment, Travel and Lodging

Common sense and moderation should prevail in business entertainment and the payment of travel and lodging expenses engaged in on behalf of the Company. Curium Personnel should provide business entertainment to or from anyone doing business with Curium only if the entertainment is infrequent, modest and intended to serve legitimate business goals.

Meals, entertainment, travel and lodging should never be offered as a means of influencing another person's business decision. Each should only be offered if it is appropriate, reasonable for promotional purposes, offered or accepted in the normal course of an existing business relationship, and if the primary subject of discussion or purpose of travel is business. The appropriateness of a particular type

of entertainment, travel and lodging of course, depends upon both the reasonableness of the expense and on the type of activity involved. This is determined based on whether or not the expenditure is sensible and proportionate to the nature of the individual involved. Adult entertainment is strictly prohibited.

Expenses for meals, entertainment, travel and lodging for Government Officials or any other individual or entity (in the private or public sector) that has the power to decide or influence Curium's commercial activities may be incurred without prior approval by Curium Compliance Office only if **all** of the following conditions are met:

The expenses are bona fide and related to a legitimate business purpose and the events involved are attended by appropriate Company representatives;

The cost of the meal, entertainment, travel or lodging by person is less than:

- Breakfast: \$50 (equivalent in Euros)
- Lunch: \$200 (equivalent in Euros)
- Dinner: \$200 (equivalent in Euros)
- Refreshments unaccompanied by a meal: \$50 per person (equivalent in Euros)
- Travel: economic class only and limited to a reasonable number
- Hospitality (Hotel): reasonable in consideration of the lieu, date and place
and

The meal, entertainment, travel or lodging is permitted by the rules of the recipient's employer (if applicable).

For all such expenses, the reimbursement request must identify total number of all attendees and their names, employer, and titles (if possible). All expense reimbursements must be supported by receipts, and expenses and approvals must be accurately and completely recorded in the Company's records. In all instances, Curium Personnel must ensure that the recording of the expenditure associated with meals, lodging, travel or entertainment clearly reflects the true purpose of the expenditure.

Note that the provision of meals, entertainment, travel and lodging as well as the reporting requirements, in this Policy, apply even if Company Curium Personnel are not seeking reimbursement for the expenses (*i.e.* paying these expenses out of your own pocket does not avoid these requirements).

When possible, meals, entertainment, travel and lodging payments should be made directly by the Company to the provider of the service and should not be paid directly as a reimbursement. Per diem allowances may not be paid to a Government Official or any other individual (in the private or public sector) that has the power to decide or influence the Company's commercial activities for any reason.

Any meal, entertainment, travel or lodging expense which is reasonably of an excessive value and greater than EUR 500 and equivalent value in other currencies per person, and any expense at all that is incurred for meals, entertainment, travel or lodging unrelated to a legitimate business purpose, must be pre-approved by the Compliance Office.

Please note that in addition to traditional gifts, meals, entertainment and travel that are provided to business relationships where Curium Personnel are not in attendance shall be considered gifts, and subject to the rules and requirements for gifts specified in this Policy.

c. Employment/Internships

On occasion, Government Officials or Curium's business partners may request that Curium provide internships or employment to certain individuals. Offering internships or employment to Government Officials or Curium's business partners may be viewed as providing an item of value.

This Policy sets forth guidance for handling such requests from Government Officials or Curium's business partners. If a candidate is interviewed for an internship or employment within the ordinary course of filling a position, the Compliance Office must be notified of the candidate's relationship to a Government Official or Curium's business partner. If a candidate related to a Government Official or Curium business partner is interviewed outside of the ordinary course of filling a position, any internship or employment offer must be pre-approved by the Compliance Office.

d. Political Contributions and Charitable Donations

Curium Personnel may not make political or charitable donations, whether in their own name or in the name of Curium, to obtain or retain business or to gain an improper business advantage. Any political or charitable contributions by Curium must be permitted under the law, permissible pursuant to the terms of this Policy, made to a bona fide organization, and in the case of political contributions or charitable contributions connected to any Government Official or government entity made with the prior approval of the Compliance Office. In certain instances where there is heightened risk of corruption, the Compliance Office may require diligence to be conducted. The Compliance Office must be notified if a Government Official solicits a political or charitable contribution in connection with any government action related to Curium or its affiliates. Individual Curium Personnel or agents may not make political contributions on behalf of Curium or its affiliates.

II. Relationships with Third Parties

Anti-corruption laws prohibit indirect payments made through a third party, including giving anything of value to a third party while knowing that value will be given to a Government Official for an improper purpose. Therefore, Curium Personnel should avoid situations involving third parties that might lead to a violation of this Policy.

Curium Personnel who deal with third parties are responsible for taking reasonable precautions to ensure that the third parties conduct business ethically and comply with this Policy. Such precautions may include, for third parties representing Curium before governmental entities, conducting an integrity due diligence review of a third party, inserting appropriate anti-corruption compliance provisions in the third party's written contract, requiring the third party to certify that it has not violated and will not violate this Policy and any applicable anti-corruption laws during the course of its business with the Company, and monitoring the reasonableness and legitimacy of the services provided by and the compensation paid to the third party during the engagement. Curium Personnel retaining third parties that will be representing Curium before governmental entities must discuss the engagement with the Compliance Office prior to hiring the third party. Any doubts regarding the scope of appropriate due diligence efforts in this regard should be resolved by contacting the Compliance Office.

In addition, once a third party is engaged, Curium Personnel who deal with third parties must always be aware of potential red flags. Red flags are certain actions or facts which should alert a company that there is a high possibility of improper conduct by a third party. A red flag does not mean that something illegal has happened, but rather that further investigation is necessary. Red flags are highly fact-dependent, but some examples of red flags are:

- Unusual or excessive payment requests, such as requests for over-invoicing, up-front payments, ill-defined or last-minute
- Payments, success fees, unusual commissions or mid-stream compensation payments;
- Requests for payments to an account in a country other than where the third party is located or is working on behalf of the Company;
- Requests for payment to another third party, to a numbered account, or in cash or other untraceable funds;
- Requests for political or charitable contributions;
- The third party is related to a Government Official or has a close personal or business relationship with a Government Official;
- Any refusal or hesitancy by the third party to disclose its owners, partners or principals;

- The third party uses holding companies or other methods to obscure its ownership, without adequate business justification;
- The third party expresses a desire to keep his representation of the Company or the terms of his retention secret; or
- The third party has little experience in the industry but claims to “know the right people”.

If Curium Personnel have reason to suspect that a third party is engaging in potentially improper conduct, they shall report the case to the Compliance Office, immediately. Curium shall conduct an investigation and stop further payments to the third party if the Curium’s suspicions are verified through the investigation.

III. Transparency on Interactions with Health Professionals

Under the anti-corruption and other laws of certain countries, conferral of any benefit (including but not limited to gifts or hospitality) to Healthcare Professionals (defined below) is subject to heightened scrutiny. Accordingly, in addition to complying with the general requirements set forth under this Policy, Curium Personnel must also comply with related healthcare compliance transparency and reporting requirements applicable to the Company’s interactions with Healthcare Professionals in each country where it operates.

Curium Personnel shall comply with the disclosure requirements of any grant, remuneration, gifts or any other benefit allocated to Health Professionals and for such purpose shall communicate all pertinent information to Curium Compliance Office and other internal organization in charge of loading and officially declaring the grant to health governmental agencies using the official centralized dedicated platforms in each jurisdiction.

In accordance with Curium policy, a Healthcare Professional is broadly defined as any person in a position to purchase, prescribe, administer, recommend, or arrange for the purchase of a Curium product, including, but not limited to, doctors, nurses, office practice managers, pharmacists, medical directors, practice managers, and pharmacy benefits managers, as well as any individuals employed by such entities who are in a position to influence, recommend, or arrange for the purchase, sale, or prescription of Curium products, or who are affiliated with: (i) formulary or pharmacy & therapeutics committees and boards; (ii) tender committees; (iii) committees associated with the development of treatment protocols or standards (e.g., developing clinical guidelines); or (iv) healthcare institutions, medical committees, or other medical or scientific organizations.

IV. Recordkeeping and Internal Controls

This Policy requires that all expenditures made by Curium are accurately reflected in the Curium’s financial records and that all payments made with Curium funds, or on behalf of Curium, have been properly authorized. Curium Personnel must follow all applicable standards, principles, laws and practices for accounting and financial reporting. Curium Personnel must be timely and complete when preparing all reports and records required by management. In particular, Curium Personnel should ensure that no part of any payment is to be made for any purpose other than that to be fully and accurately described in Curium’s books and records. Curium Personnel should use best efforts to ensure that all transactions, dispositions, and payments involving Curium funds or assets are properly and accurately recorded in the Company’s financial records. No undisclosed or unrecorded accounts are to be established for any purpose. False or artificial entries are not to be made in Curium’s books and records for any reason. Finally, personal funds must not be used to accomplish what is otherwise prohibited by this Policy.

The Compliance Office is primarily responsible for the oversight and enforcement of this Policy. Curium will conduct periodic audits of its books and records to monitor compliance with this Policy.

V. Compliance Procedures and Training

As part of Curium's ongoing commitment to anti-corruption compliance, all Curium Personnel (new and existing Curium Personnel) must receive and review a copy of this Policy.

In addition, Curium will set up anti-corruption compliance training programs to educate Curium Personnel about the requirements and obligations of anti-corruption laws and this Policy. All Curium Personnel of the Company should participate in such training.

VI. Reporting Requirements and Whistleblower Protection

Curium takes its commitment to anti-corruption compliance very seriously and expects all Curium Personnel to share that commitment. Curium therefore expects and requires any Curium Personnel who have knowledge of, or reason to suspect, any violation of this Policy to contact the Compliance Office immediately. Reports may be made anonymously, unless local procedures demand otherwise in certain cases (e.g. harassment complaints).

It is Curium's policy that, if the report of known or suspected violations is made honestly and in good faith, no adverse employment-related action will be taken against any Curium Personnel in retaliation for reporting a violation or suspected violation of anti-corruption laws or this Policy.

All questions regarding this Policy should be directed to the Compliance Office.

EXHIBIT B: CURIUM'S ANTITRUST COMPLIANCE POLICY

I. INTRODUCTION

- Curium Bidco Sàrl, its affiliates (collectively, “Curium” or the “Company”) and its management, is committed to comply fully with the antitrust and competition laws of all the countries where it does business. Virtually every country in which Curium does business has competition laws. These laws broadly follow the same key principles.
- This policy is fully endorsed by Curium’s Management and it constitutes an integral element of Curium’s overall antitrust culture and ethical standards.
- Curium operates in markets with particular characteristics and a limited number of competitors. This imposes greater constraints on Curium’s actions than might otherwise be the case. The following guidance is provided on the assumption that Curium’s market position is such that in each instance it is subject to the highest obligations not to distort competition by its actions.
- **Any Curium employee who becomes aware of any potential antitrust violation, or who is solicited to commit a potential antitrust violation must immediately contact the Curium Compliance Office email requesting the Compliance Office to call him back.**

II. BASIC ANTITRUST RULES

ALWAYS	NEVER
Contact Curium’s Compliance Office by email requesting them to call you back if you have any concerns about antitrust laws.	Exchange pricing information with a competitor.
Engage in vigorous competition with your competitors.	Discuss bids with competitors.
Contact Curium’s Compliance Office if a competitor shares with you, information about its prices or bidding plans.	Divide or allocate customers or markets.
Avoid even the appearance of impropriety.	Condition the purchase of one product on the purchase of another product without the prior approval from Curium’s Compliance Office.
Terminate any discussion or meeting that appears improper and contact Curium’s Compliance Office by email requesting them to call you back.	Hesitate to contact Curium’s Compliance Office for guidance and advice.

III. PURPOSE AND REACH OF ANTITRUST AND COMPETITION LAWS

- Antitrust laws are designed to preserve a competitive economy. A core principle is that it is most efficient (and customers are better off) when the forces of supply and demand determine prices and output, and each competitor takes its own business decisions freely and independently.
- Competition law reaches conduct beyond national borders. For example, inappropriate conduct with a competitor relating to Curium's business in Europe will infringe EU antitrust law, regardless of whether it takes place at a trade fair in Hong Kong or at Curium's premises in France.

IV. CONSEQUENCES OF ANTITRUST INFRINGEMENTS

For Curium:

- Significant monetary fines (e.g., the European Commission has the power to fine companies up to a maximum of 10% of their previous year's turnover).
- Private damages: any customer that can prove it has been harmed by Curium's behavior may commence a lawsuit (including class actions, in some jurisdictions) seeking damages.
- Legal fees.
- Business disruption for key employees.
- Reputational damages.

For Curium employees:

- Job loss.
- Jail time, monetary fines, disqualification of executives (e.g., Article L. 420-6 of the French Commercial Code provides for imprisonment and fines for individuals who fraudulently play a personal and significant role in designing, organizing or implementing anticompetitive practices).

V. RELATIONS WITH COMPETITORS

1. **Contact with competitors must be kept to a minimum**

Meeting and interacting with competitors is not unlawful in itself. However, even legitimate cooperation with competitors may pose antitrust risks. Great care must be taken with regard to the content of the exchanges that occur during (legitimate) interactions with competitors. If interaction with a competitor takes place, for example, because the competitor is also a customer or supplier, or because the competitor is participating in a trade show or a trade association meeting, restrict the scope of your exchanges with this competitor to what is strictly necessary and abide by the rules of conduct set out below. Even the appearance of collusion can be very costly to Curium and its employees.

Example: Can Curium enter into a joint production agreement for generators with a competitor? It depends on the facts. This arrangement would need to be closely reviewed by Curium's Legal Department.

2. **Never discuss or agree to the following items with competitors**

- Prices and discounts: these include prices, discounts and rebates, price lists, credit terms, etc.
- Costs of specific products.
- Sales volumes or market shares, sales or service territories, conditions of sale.
- Allocation or sharing of customers, territories or products.
- Information about production, notably production rates, the opening and closing of manufacturing sites or other premises, plant capacity, capacity utilization and delivery schedules.
- Market plans relative to entering or exiting markets or product categories.

3. Do not coordinate bids or Requests for Quotations (“RFQs”) with competitors

- Bid rigging is *always* illegal. Companies must respond to customers’ bids and RFQs independently. Under certain circumstances, competitors can form *consortia* or other forms of cooperation in order to submit a joint offer. Always consult with Curium’s Legal Department before entering into any cooperation with a competitor in connection with a customer’s bid.
- If a competitor contacts you about how Curium intends to respond to a bid or RFQ, simply say that you do not intend to share Curium’s information and immediately inform Curium’s Compliance Office by email requesting them to call you back.
- If a customer provides you with the price offered by the competition, do not attempt to verify this price with competitors.

4. Never exchange confidential or competitively sensitive information

- Curium should stay clear from exchanging competitively sensitive information with competitors, especially if the information concerns the following: prices, inventory, profits, strategies, costs and terms of sale, price announcements.
- If you receive unsolicited sensitive information from a competitor, make note of how and from whom you obtained it and do not communicate with that competitor regarding its content. Instead, contact Curium’s Compliance Office by email requesting them to call you back.
- Information concerning competitors may only be obtained from sources other than your competitors themselves; you must document the source of any information concerning competitors, in order to be able to prove that it was legitimately obtained.
- If you receive information from a competitor or information that you think was sent by a competitor, a letter, prepared with Curium’s Legal Department, must be immediately sent to the competitor.
- You must obtain approval from Curium’s Legal Department before sharing any competitively sensitive information outside the company.

Example: Can Curium pick up the phone and check how a competitor plans to respond to a specific RFQ? NO!

VI. RELATIONSHIPS WITH CUSTOMERS OR DISTRIBUTORS

Because Curium operates in markets with particular characteristics and a limited number of competitors, you should be aware that the following practices may raise potential antitrust risks.

1. Prices and sales terms

- Excessive pricing: High prices that have “no reasonable relation to the economic value of the product”. Excessive pricing is a problem if a competitor is placed at a disadvantage (e.g., by having to pay more for input products).
- Predatory pricing: Pricing below cost may be illegal if the object is to force competitors to exit the market.
- Discriminatory pricing: Curium may not discriminate between its customers if this affects competition. Concerns may arise if a supplier gives non-competing customers a price advantage over competing customers. Price discrimination means applying different prices and price components to similarly situated customers. Customers are not similarly situated if they buy the products at significantly different points in time, buy significantly different quantities or grades, or use the product for different ends.

A possible justification for pricing decisions may be to show that the purpose of the act was actually something other than harming a competitor (e.g., cost savings, meeting competition, changed market conditions, etc.). Contact Curium’s Compliance Office by email requesting them to call you back if you have doubts or questions in relation to a specific situation.

Example: Can Curium apply a higher price for Mo-99 simply because the customer is also a competitor? NO!

2. Discounts and rebates

Curium cannot use discounts or rebates to lock in customers. Potentially problematic discount/rebate plans include: rebate schemes with long reference periods (e.g., more than 1 year); rebates based on Curium’s share of a customer’s total purchases; rebates based on all products purchased from Curium; rebates based on increasing purchase volumes; rebates based on what a customer would have purchased from other suppliers.

However, volume-related savings, reduced packaging or shipping costs may justify certain decisions.

Example: Can Curium condition the offer of a discount scheme on the customer’s commitment to purchase from Curium for at least three years? *It depends on the facts.* Consult with Curium’s Legal Department regarding any rebate structure.

3. Tying/bundling

- “Tying” refers to conditioning the sale of one product on the purchase of another.
- “Bundling” refers to selling two or more distinct products together as a single product (it includes situations where goods are sold together for less than the sum of their individual prices).

Tying and Bundling activities are likely to create antitrust issues. These activities require a careful analysis of their compliance with law and must always be submitted to the Legal Department before being proposed to a customer.

Example: Can Curium agree to sell PET products only on condition that the same customer agrees to also buy SPECT products? *It depends on the facts.* Consult with Curium's Legal Department if you wish to engage in any tying/bundling practice.

4. Exclusivity provisions

Always contact Curium's Legal Department if you want to apply exclusivity provisions. Danger areas:

- Requiring customers to buy all of their requirements of that product from Curium.
- Requiring distributors not to carry competitors' products.
- Requiring customers to allow Curium to match competing offers.
- Restrictions on passive sales (unsolicited sales outside an exclusive sales territory) are always prohibited.

5. Resale prices

Irrespective of market conditions, once Curium has sold a product to a distributor (or customer), it cannot control the price at which its distributor (or customer) re-sells the product.

- Setting a specific or minimum resale price is illegal in most jurisdictions. It can limit competition between distributors and facilitate collusion.
- Recommending resale prices (e.g., recommended price lists), is usually permissible as long as your resellers decide independently to observe specified resale prices.
- Using the implicit or express threat of sanctions to enforce compliance with recommended prices turns the recommendation into a potentially unlawful resale price maintenance agreement.

Example: Can Curium apply higher prices because a distributor refuses to adhere to Curium's recommended price lists? NO!

6. Termination/refusal to supply

Companies with strong market positions may not terminate or refuse to supply a customer (absent any creditworthiness concerns) if to do so would cause harm to competition. Danger areas include:

- Refusing to supply an existing customer (refusal to supply a *new* customer must be reviewed on its facts with the Curium Legal Department).
- Where the customer competes (or may compete) with Curium.
- Where the customer wants to develop the product for a new market.

VII. RELATIONSHIPS WITH SUPPLIERS

When dealing with suppliers, Curium must respect their freedom to select their own customers. Bear in mind that:

- Curium may not impose exclusive obligations on its suppliers.
- Curium's ability to extract excessively low prices might be considered abusive.

Example: Can Curium refuse to source molybdenum from a supplier unless the latter agrees to stop selling the same input to Curium's competitors? NO!

VIII. MEMBERSHIP OF TRADE ASSOCIATIONS

Trade association meetings can be perfectly legitimate and are not in themselves prohibited. However, trade association meetings present special risks, especially where competitors and/or distributors are present. The simple fact of participating in a meeting where inappropriate subjects are discussed can be dangerous.

- **Do** get the agenda in advance of the meeting and consult with Curium's Legal Department if any agenda item appears to raise antitrust concerns.
- **Don't** attend meetings that do not have a clear and defined agenda.
- **Don't** raise any matter or make any statement at the meeting that you think may involve competitively sensitive information without consulting with Curium's Legal Department.
- **Don't** prepare any report summarizing or benchmarking the information exchanged during the meeting without consulting with Curium's Legal Department in advance.
- **Don't** attend a meeting at which prohibited topics are discussed. If such topics are raised outside the agenda, strongly request that the discussion stop immediately. If the discussion continues, leave the meeting, ask for your departure to be recorded in the minutes and immediately inform Curium's Legal Department.
- **Do** request a copy of the minutes of each meeting you attend. Review it carefully and send any amendments you deem appropriate. If you do not receive minutes, prepare your own with the assistance of Curium's Legal Department.
- **Don't** discuss prohibited topics with competitors during lunches, coffee breaks or other informal gatherings held before or after these meetings.

Can Curium attend trade association meetings where competitors discuss future SPECT prices or other competitively sensitive topics? NO! Even passive participation without clearly distancing yourself from what is being discussed can put Curium at risk of being found liable of an antitrust violation.

EXHIBIT C: CURIUM TRADE COMPLIANCE POLICY

SECTION 1: Introduction

Curium Bidco Sàrl, its affiliates (“Curium” or “Company”) and its management are committed to complying with all applicable export, import, and economic sanctions (collectively, “trade compliance”) laws of all countries in which Curium does business, including without limitation all such laws of the United States and of the European Union. This commitment extends to promoting strict compliance on an on-going basis and managing all international activities with direct supervision, control, and reasonable care.

It is Curium’s policy to ensure that a compliant and consistent approach to managing trade compliance activities is applied globally.

Employees who are aware of potential violations of this policy or non-compliance issues regarding trade compliance laws should report them immediately to local management and the Compliance Office.

SECTION 2: PURPOSE OF THIS POLICY

The purpose of this policy is to ensure that Curium complies with all applicable trade compliance laws. Curium is committed to implement and maintain an effective Global Trade Compliance.

SECTION 3: SCOPE OF THIS POLICY

This policy applies worldwide to Curium and any of its global divisions, subsidiaries, affiliates, majority-owned joint ventures, branch offices and other Curium controlled entities, and to all directors, managers, officers, and employees of the Company, as well as any third-party agents or distributors acting for or on behalf of Curium.

This policy encompasses all Curium products and services that are imported, exported, or re-exported in all jurisdictions in which the Company conducts business, irrespective of value, method of shipment (e.g., air, water, surface, passenger hand-carry, or electronic transmission), or rate of duty.

SECTION 4: POLICY OWNER AND STATEMENT OF RESPONSIBILITY

This policy is owned by the Compliance Office in conjunction with other functional areas including supply chain, finance, tax, government affairs, manufacturing, and purchasing.

It is the responsibility of the Company and all Curium employees to comply with the regulations governed by this policy. It is the personal responsibility of all Curium employees to act in accordance with the legal standards and restrictions relevant to their assigned duties including, as applicable, European Union and U.S. trade compliance laws, as well as the trade compliance laws of any European Union Member States and other jurisdictions in which the Company does business. A violation of applicable laws may subject a Curium employee and/or the Company to civil and criminal penalties. Violations of this policy may result in disciplinary action, up to and including termination. If you believe that any requirement of this policy is in conflict with local laws, please contact the Compliance Office.

SECTION 5: POLICY

Conformance to Laws and Regulations

Curium's import and export operations in each country in which it operates shall be consistent with local laws and requirements. All employees are responsible for conducting their import and export activities in compliance with applicable laws and regulations. Each supervisor and manager is also responsible for ensuring employee understanding and compliance with the trade compliance laws associated with the activities where the employee is engaged.

Export Controls Compliance

Most countries place restrictions on the export of goods or technology for national security and non-proliferation reasons, and items with potentially dangerous end-uses (e.g., biological weapons and chemical weapons precursors) may require government approval prior to export. Because of the nature of our products, however, many Curium products may be exported to any country in the world with no prior authorizations, with the exception of countries subject to foreign-policy controls, embargoes, and sanctions.

Production equipment, computers, chemicals, and other non-production goods may be subject to restrictions, however, even if used to make pharmaceutical products. This is because of the "dual-use" nature of these types of items. For example, Curium may use laboratory equipment to develop new medicines, but someone else might use the same equipment to develop a biological weapon. Therefore, it is important to remember that the export of any articles, technology, or software, and, in the United States, the "release" of technology to a non-U.S. national, must be in compliance with Company procedures.

In addition, Curium radiological products, and the transportation of such products, also may be subject to nuclear regulatory controls in the various jurisdictions in which the Company operates.

Economic Sanctions and Embargo Compliance

a. Company Policy

It is Curium's policy that all employees comply with applicable laws and regulations regarding economic sanctions, embargoes, and other restrictions on transactions with certain countries, groups, and individuals. This policy and the sanctions laws behind it apply to trade in goods and services, investments, financing of trade transactions and the supply of technology associated with goods and services. As a matter of Company policy, no Curium legal entity, regardless of country in which it is located, and no Curium employee, regardless of citizenship, will engage in transactions involving countries embargoed or subject to comprehensive sanctions by the EU or U.S. (see **Appendix A**), unless approved by Curium's Legal Department. The Company has implemented safeguards to prevent and detect shipments to sanctioned and embargoed countries, including denied parties screening. The circumstances in which Curium may approve transactions with countries or persons subject to sanctions and embargoes are very limited and may be considered only if execution of the relevant transaction would be lawful.

. Any employee that wants to engage in activities involving countries embargoed or subject to comprehensive sanctions by the EU or U.S., whether or not within the scope of any other authorization or applicable regulation, must first consult Curium's Legal Department.

b. Summary of U.S. Sanctions

U.S. sanctions apply to U.S. citizens, wherever they are located, permanent residents, entities organized under the laws of the U.S, and persons and entities located in the U.S. The sanctions also apply to trade in U.S. goods, services, and technology by any person. Importantly, non-U.S. made products that contain more than 10% controlled U.S. content, by value, may be restricted for export to

countries subject to U.S. embargoes or sanctions, regardless of which Curium legal entity is selling such goods. The sanctions also apply asset freezes and other forms of financial sanctions on specified individuals and entities. U.S. sanctions apply, for example, to the clearance of U.S. dollar transactions through the jurisdiction of the U.S. See below for separate section on 'facilitation' of transactions under U.S. sanctions law.

c. Summary of EU Sanctions

EU sanctions apply to EU nationals, corporate entities and persons or business in the EU. EU sanctions restrict the sale for export out of the EU of covered goods, services and technology. They also impose wide-ranging asset freezes and restrictions on the provision of credit or other economic resources to various named individuals or entities. EU sanctions include provisions prohibiting any involvement, directly or indirectly, in efforts to circumvent sanctions.

EU sanctions are agreed centrally but enforced by each EU Member State. Member States can impose additional sanctions measures beyond those of the EU, although examples of this practice are limited. Member States can also vary in their interpretation of the sanctions measures passed by the EU. In all, it is essential for Curium personnel to consider not only the EU sanctions but their interpretation and, possibly, imposition of additional measures by Member State governments.

It is important to remember that non-EU European jurisdictions, including Switzerland and Norway, are outside the control of the EU institutions imposing sanctions and may have a different approach to the substance, as Switzerland often does, and the interpretation of the sanctions measures.

d. Denied Parties Screening Policy

The EU and U.S. also impose targeted sanctions and export controls on individuals and entities that have been designated under sanctions targeting terrorists, narcotics traffickers, organized crime syndicates, and weapons proliferators, wherever they are located. In many cases, the sanctions prohibit EU and U.S. persons from engaging in virtually all transactions with such designated individuals and entities. It is Curium's policy that each relevant business develop procedures to screen all of their customers and business partners against all relevant denied parties lists, including those maintained by the U.S. and EU.

e. Special Obligations of U.S. Person Employees

No U.S. person (which includes U.S. citizens, U.S. permanent residents, U.S. corporate entities, or persons located in the United States), wherever located, will engage in any trade transaction, or otherwise "facilitate" or participate in any activity that violates U.S. trade compliance laws or regulations, including any transactions or prohibited activities involving any countries embargoed by the United States. For US persons and US entities, this prohibition on facilitation includes performing any of the following activities, unless such U.S. person activities are approved by licenses or other approvals issued by the U.S. Department of Treasury's Office of Foreign Assets Control ("OFAC"): selling, shipping, brokering, financing, approving, supporting (e.g., technical, warranty/claims, or legal support), processing, arranging, advising, referring an order or other business opportunity to any non-U.S. entity, or restructuring transactions to permit or assist a non-U.S. entity or person to perform such transaction

Anti-Boycott Compliance

Anti-boycott regulations require any U.S. company and their subsidiaries to refuse to participate in unsanctioned foreign boycotts of countries friendly to the United States. Importantly, the receipt of a

boycott related request may require Curium to file reports with the U.S. Department of Commerce, and the U.S. Department of the Treasury even if the Company expressly rejects the request.

Any requests received by a Curium employee to support a trade boycott of any country must first be reported to the Compliance Office prior to acting on the request. The Compliance Office will provide you the necessary information to determine what actions, if any, may be lawfully taken with respect to the request. Examples of boycott related requests may be found at <https://www.bis.doc.gov/index.php/enforcement/oac/7-enforcement/578-examples-of-boycott-requests>.

SECTION 6: GLOBAL TRADE COMPLIANCE TRAINING

Each continental region shall be invited to follow a Global Trade Compliance Training.

SECTION 7: WHO TO CONTACT

Any questions or concerns related to this Policy or potential non-compliance events must be directed or reported to your direct supervisor or manager and the Compliance Office.

APPENDIX A – LIST OF COUNTRIES/TERRITORIES SUBJECT TO COMPREHENSIVE EMBARGOES OR COMPREHENSIVE SANCTIONS

- **Crimea region of Ukraine**
- **Cuba**
- **Iran**
- **Libya**
- **North Korea**
- **Russia**
- **Sudan**
- **Syria**

EXHIBIT D CURIUM INFORMATION POLICY

A. PERSONAL INFORMATION POLICY

At a peak of digital age, May 25th, 2018 marked a drastic change in regard to data protection across the European Union and beyond. It is since that day that is applied *the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (The General Data Protection Regulation)*. This Regulation aims to harmonize the data protection Law. As a regulation, the General Data Protection Regulation (hereinafter “GDPR”) is **directly applicable** in all European Union member states. Under the GDPR, CURIUM is identified as a Controller, that is to say a legal person which determines the purposes and means of the processing of personal data.

CURIUM's observation of the GDPR and other similar regulations through **all employees' commitment** is essential as these regulations severely sanctions companies which do not comply.

In this context, the **aim** of this policy is to give you the opportunity to understand what CURIUM's position on privacy and personal data is, how the new legislation applies to CURIUM's employees and to the Group, and what is expected from CURIUM's actors.

It might also be the opportunity for you to answer questions from business partners concerning CURIUM's process of personal data (this policy remaining confidential). Indeed, CURIUM values its business partners' trust in the Group and this trust involves the assurance, for any of these business partners, that its personal data are collected and processed in a lawful way. All CURIUM's actors (that is to say everyone working for the Group, meaning employees or consultants) **must ensure to comply with this Curium Information Policy** and might refer to it in case CURIUM business partner is enquiring regarding the commitment of the Group on personal data.

1. WHICH PERSONAL DATA MIGHT BE COLLECTED BY CURIUM?

The GDPR refers to the protection of natural persons with regards to the processing of their personal data.

“Personal data” are any information relating to an identified or identifiable natural person such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person

“Processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The above definitions are very broad. Personal data information might vary depending of the field of industry of each company. **Personal data likely to be processed by CURIUM mainly concern employee's information** (names, phone contacts, addresses etc.) followed by personal data collected in the frame of day-to-day interactions with our business partners. It would not be expedient to exhaustively list all personal data susceptible to be processed. For this reason, please always refer to the terms defined above if questioning on the application or not of this personal information policy.

2. WHY IS CURIUM COLLECTING AND PROCESSING PERSONAL DATA?

CURIUM is collecting and processing personal data to:

- Provide information and services to its employees;
- Provide information and services to its business partners;
- Contact and interact with its business partners;
- Operate its business and especially comply with applicable law, regulations and requirements of regulators, governments and authorities (e.g. pharmacovigilance obligations);
- Perform its contractual obligations as diverse they might be;

Many legitimate business purposes can therefore **justify** the collection and processing by CURIUM of personal data. However, please take into consideration that the processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation **shall be prohibited** (exceptions to be presented below).

3. HOW DOES CURIUM COLLECT AND PROCESS PERSONAL DATA?

CURIUM is implementing **appropriate technical and organizational measures** to ensure a level of security appropriate to the risk identified by the IT department.

For example:

- The pseudonymization and encryption of personal data;
- The ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- The ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- A process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.

In practice it means:

- The access to server rooms only with key and the securing of IT rooms with alarm;
- The mandatory use of individual credentials and password for confidentiality and tracking purposes (pharmaceutical audit trials);
- The restriction of users' access for specific tasks they are involved in;
- The challenge of personal data usage and potential substitutions of user-related data by ransom codes;
- The encryption of hard disk or cloud solution;
- The regular checking of backups for recovery
- The regular evaluation of technical and organizational measures on effectiveness and plausibility;
- Monitoring of network activity, remote accesses, firewall usage and antimalware protecting tools, private secured network to transfer data, up-to-date supported systems and hardware to ensure latest protections
- Implementation and update of company policies and processes to reflect changes in regulations and duties, especially related to data handling and protection.

4. FOR HOW LONG WILL CURIUM RETAIN PERSONAL DATA?

CURIUM will keep personal data in accordance with what is demanded by the Nuclear and Pharmaceutical regulations, applicable laws and systems consistency and, otherwise, as short as necessary in relation to the purposes for which they are collected or processed, following on this GDPR requirement.

The preservation time of personal data may be shortened if a data subject (whether external or internal to CURIUM, identified or identifiable natural person whose personal information are collected by CURIUM (hereafter a “Data Subject”)) withdraws his or her consent or objects to the processing of personal data concerning him or her, or where the processing of his or her personal data does not comply with this Regulation. Preservation time imposed by specific regulations will however prevail on that right of Data Subjects to shorten or withdraw the retention of personal data.

5. DOES CURIUM SHARE PERSONAL DATA?

CURIUM may disclose personal data in the following situations:

- between its subsidiaries and affiliates (companies controlling, controlled by, or under common control of a CURIUM company) for legitimate business purpose;
- with its third-party service providers such as processors that is to say natural or legal persons, public authorities, agencies or other bodies which processes personal data on behalf of the controller;
- to conduct surveys, provide technical support, and transmit communications;
- to comply with its legal obligations, including in response to lawful requests (e.g., court orders, in connection with any legal or regulatory process, or to comply with relevant laws by public authorities, such as to meet national security or law enforcement requirements);
- to protect and defend CURIUM rights and property, to defend CURIUM against a legal claim; to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, for audit purposes, or a violation of CURIUM policies;
- **with Data Subject’s permission**, to share information with unaffiliated third parties who are not described elsewhere in this policy.

6. HOW DOES CURIUM PROTECTS PERSONAL DATA?

CURIUM, acting as the Controller, commits to respect GDPR’s obligation on all personal data that CURIUM may have to collect, stock and process.

CURIUM therefore commits (and expects from all its employees) to:

- treat personal data of each concerned Data Subject in a lawful, loyal and transparent way;
- acknowledge all the personal data collected and processed;
- inspect that collected and processed personal data are indeed necessary in regard to the field of activity of CURIUM;
- ensure the respect of the rights of persons of whom personal data are involved (right to access, right to erasure, right to rectification, right to restriction of processing, right to data portability, right to object);
- ensure its ability to share personal data process information on the limit of each storage;
- only call on processors with sufficient warranty regarding the implementation of technical and organizations measures, and which meet the requirements of the GDPR including the security of processing and all other rules applicable to processors;
- respect and command respect of the GDPR if personal data are transferred outside the European Union (for the sake of an agreement for example).

7. EXCEPTIONS

As already mentioned, in order to operate its business **and comply with applicable law, regulations and requirements of regulators, government and authorities** such as pharmacovigilance obligations, CURIUM might collect and process personal data without the detailed consent of the Data Subject.

8. DATA PROTECTION RESPONSIBLE PERSON

CURIUM data protection responsible persons are Anne Parmantier, Xavier Defourt and Bob Budenholzer (for the US), all of them reachable at the following email address: Compliance.Office@curiumpharma.com (hereafter referred to as the “Responsible Person”).

CURIUM ensures that the data protection Responsible Person is involved, properly and in a timely manner, in all issues which relate to the protection of personal data.

Data subjects may contact the data protection Responsible Person regarding all issues related to the process of their personal data and to the exercise of their rights under the GDPR. The data protection Responsible Person is bound by secrecy or confidentiality concerning the performance of his tasks.

9. WHAT IS EXPECTED FROM CURIUM’S MEMBERS

As major actors of this Privacy Policy, CURIUM expects its employees to:

- **Contact** the data protection Responsible Person if you have any query regarding the collect and process of **your** personal data by CURIUM.
- **Immediately** inform the data protection Responsible Person if there in any query of a Data Subject regarding her/his personal data.
- Handle over to the **data protection Responsible Person** all demands regarding personal data in a clear and understandable way, and in a reasonable time. Queries from Data Subjects must **always** be managed by the data protection Responsible Person and not directly by employees unless formerly delegated.
- Define essential personal data you need in respect to **your specific context**. It is indeed important for CURIUM to rely on processes and measures enabling, from the start, an **optimal protection of personal data** and therefore a **minimization of the collect**. It might be the opportunity for you to **update** your personal data requests (for example, to review forms you might send to your customers or other business partner which as of today, request personal data which eventually, are not indispensable).
- If the Data Subject has not been requested to give his/her consent to the collect and process of its personal data (through a form, specific article of a contract or any other medium), you shall **save** written statements, emails, forms **which can evidence that Data Subject agreed to the collect and process of her/his personal data for specific purposes**. Do not hesitate to make screenshots and collect in a unique folder, all evidences which should be communicated to the data protection Responsible Person.
- Strictly follow the Social Media and Password policies (below)

B. SOCIAL MEDIA POLICY

Social medias are now part of the business and its performance. CURIUM **recognizes the importance** and usefulness of these while remaining aware of the **risks** they can involve.

CURIUM’s actors must acknowledge that due to CURIUM’s activity in the field of **healthcare**, they are **all responsible** to protect and ensure the professional **renown** of the Group. You must therefore be aware of the importance of social media (such as Facebook, LinkedIn, Twitter, YouTube, Instagram, personal blogs and other websites) and follow the below guidelines whenever you are using social media:

- As CURIUM's employee, you are expected to share the values of the Group and this even in the private sphere. Therefore, your use of social media should never denigrate CURIUM and always be in the **spirit of our corporate values**;
- Do not mention CURIUM in your interactions on social media (LinkedIn being an exception when mentioning your current or former position within CURIUM);
- Be aware that your action, as an actor of CURIUM, can have impact on the Group **image** and might remain public for a long time;
- Use your **best judgment** when interacting on social media in order to always act with **decency**, never be inappropriate, harmful to CURIUM its employees or its business partners, nor create a hostile work environment;
- **Never** interact on behalf of CURIUM on social media if you have not been authorized (in writing) to do so by a person entitled to provide you with such authorization. If duly authorized, all communication through CURIUM' social media should be **correct, clear and approved** by the marketing department;
- Get appropriate permission and authorization before referring to or posting images of CURIUM employees or business partners (current or former ones);
- Identify yourself as CURIUM representative (when speaking and if authorized to so) on the **name** of CURIUM;
- Only share **publicly available information** excluding information considered confidential or with a confidential nature. Should you have any question about the confidentiality of an information, please check with your supervisor or marketing department;
- Always remember that social media may generate **press and media attention** as well as **legal** questions;
- Make sure to inform the marketing department and the Compliance Office about any positive or negative remarks about CURIUM's products you might come across with (and keep a record of it).
- **Never** interact directly when the above-mentioned situation occurs.
- Social media should not interfere with your responsibilities at CURIUM and CURIUM's computer systems are to be used for business purposes only.

C. PASSWORD POLICY

Usernames and passwords are the primary mechanisms that protect CURIUM information technology systems and other resources from unauthorized use. This policy applies to all computing resources administered by CURIUM.

1. POLICY

It is important for you, as an account holder and/or system administrator, to construct secured password and to ensure the safe management of your password and this in order to reduce the risk of dissemination of information to undesirable or unauthorized parties.

Computing accounts must be protected by **strong** passwords.

- Never write down your username and password (including under electronic form) unless following IT's recommendation regarding a specific vault system
- Never share a password with anyone, including in the IT department, and never include them through email
- Never include a password in a non-encrypted stored document
- Never hint at the format of your password
- Never use the "Remember Password" feature of application programs such as Internet Explorer, your email program, or any other CURIUM computing resources on non-Curium equipment, and avoid to do so on CURIUM's one

- Never use your corporate or network password on an account over the internet which does not have a secure login
- Report any suspicion of your password being broken to the IT department
- If you have the possibility to modify your password, don't use common acronyms common words, names of people, parts of numbers easily remembered
- Specific CURIUM applications might recommend password rules. If applicable, make sure to follow these rules
- Make sure you do not share your username and password with anyone **including** your colleagues and/or other CURIUM's stakeholders

2. ROLES AND RESPONSIBILITIES

Each department is responsible for implementing, reviewing and monitoring internal practices to ensure compliance with this policy.

The Chief Information Officer is responsible for enforcing this policy and is authorized through its department, to set and maintain specific password creation and management standards for CURIUM systems and accounts.

3. CONSEQUENCES AND SANCTIONS

Violations of this policy may incur the same types of disciplinary measures and consequences as violations of other CURIUM policies, including progressive discipline up to and including termination of employment.