

CORPORATE SOCIAL RESPONSIBILITY

1 INTRODUCTION

BerGenBio ASA ("**BerGenBio**") defines corporate responsibility as conducting the company's business and achieving commercial profit and/or shareholder value in a way that is consistent with fundamental ethical values and with respect for individuals, the environment and society. BerGenBio and its subsidiaries (the "**Group**") shall respect human and labour rights, establish good environmental, health and safety (HSE) standards, facilitate good dialogue with stakeholders and generally operate in accordance with applicable regulatory frameworks and good business practice.

The Group's business depends on the trust of costumers, contractual parties, the authorities, shareholders, employees and society in general. In order to gain trust, the Group is dependent upon professionalism, expertise and high ethical standards in all aspects of the Group's work. These ethical and corporate social responsibility rules (the "**CSR Guidelines**") set forth the basic principles for business practices and personal behaviour for BerGenBio and apply to all employees of the Group, as well as persons/entities holding a position of trust with BerGenBio and hired consultants acting on behalf of the Group.

The CSR Guidelines do not give customers, suppliers, competitors, shareholders or other persons or entities any legal rights beyond those that follow from applicable legal regulatory frameworks.

2 MAIN PRINCIPLES OF CORPORATE RESPONSIBILITY

BerGenBio has identified the following main corporate responsibility topics. The general principles underlying the Group's approach to these topics are described below. Priorities shall be based on an assessment of the needs of both the business and its stakeholders, and as an integral part of day-to-day operations.

2.1 Strong corporate culture

BerGenBio shall strive to promote an open corporate culture that fosters. In promoting BerGenBio's principles for good business operations, we shall respect local values and norms, and achieve success by bridging the divide between different cultures and interests. BerGenBio companies shall always comply with local regulatory requirements in the countries in which we operate.

Responsible operations require vigilance and the exercise of good judgement on the part of management and employees.

2.2 Respect for human and labour rights

BerGenBio companies shall promote corporate conduct that reflects respect and consideration for others. In its operations BerGenBio shall respect fundamental human rights as described in international human rights conventions such as the UN Convention on Human Rights and the labour rights conventions of the International Labour Organization (ILO). BerGenBio is committed to respecting fundamental human and labour rights, both in our own internal business and in our relations with business partners, suppliers, customers and others who are directly affected by BerGenBio's activities. The Group shall work systematically with important issues as non-discrimination, the right to privacy, the right to negotiate, employment contracts, protection against harassment and management-employee collaboration.

2.3 Health, safety and environment, (HSE)

BerGenBio shall strive to achieve a vision of zero harm to people, the environment and society, and work purposefully and systematically to reduce the environmental impact. The Group's products and services shall always be subject to strict requirements in terms of quality, product safety and impacts on personal health and the environment.

2.4 Ethics in Research & Development

BerGenBio follows existing principles, regulations and guidelines to ensure the highest ethical standards in its research. BerGenBio also work to ensure that volunteers and patients are exposed to the lowest risk possible.

All employees as well as external contractors are required to strictly adhere to the Group's guidelines for Ethics in Research & Development.

2.5 Anti-corruption

Corruption is the abuse of a position of trust to acquire personal or business benefits. BerGenBio does not tolerate corruption, and expects that all leading employees promote a strong anti-corruption culture in their department.

The companies in the Group shall make active efforts to prevent undesirable conduct, and ensure that the employees are capable of dealing with difficult situations.

2.6 Insider trading

Employees and board members shall not trade, nor give advice to others about trading, in the securities of BerGenBio or other listed companies on the basis of non-public information acquired in work for BerGenBio which, if publicly known, may influence the price of the securities.

If an employee or a board member is in doubt concerning how to apply or interpret BerGenBio's requirements or the public laws on insider trading, the management should be consulted.

2.7 Money laundering

Money laundering is the process of creating the appearance that assets obtained from criminal activity, originate from a legitimate source. BerGenBio shall avoid any involvement with assets resulting from criminal activity.

2.8 Whistleblowing

Notification or whistleblowing is to pass information about a censurable or possible censurable incident to someone who is in a position to initiate corrective measures. A censurable incident is an illegal, dangerous or any other act in breach of company regulations. Anyone who becomes aware of an incident/situation which appears to contravene rules and guidelines which apply to the Group's operations is encouraged to report this.

Every employee has the right to report possible censurable incidents. Each employee is encouraged to report on possible censurable incidents but is not normally obliged to do so. However, every employee has an obligation to report on criminal activity and on incidents which could endanger life or health, or the assets of the Group.

Notification is beneficiary for each employee, for BerGenBio and the society as a whole because it offers an opportunity to implement corrective action. A colleague willing to make a report is an important resource to BerGenBio.

2.9 Compliance with legislation and regulation

BerGenBio is subject to Norwegian and international legislation and regulations.

Some Norwegian legislation also applies outside the country's border, e.g. the provisions of the penal code that refer to corruption.

BerGenBio's employees, representatives and anyone who acts on behalf of BerGenBio must comply with all legislation and regulations that apply, directly or indirectly, to the work performed for the Group.

3 COMPLIANCE AND IMPLEMENTATION

3.1 The duty to comply

Each employee and board member of BerGenBio has a personal responsibility for complying with all the requirements specified in The CSR Guidelines. Employees and board members shall not act (or encourage others to act) contrary to the CSR Guidelines the Code of Conduct.

3.2 Implementation and monitoring

The responsibility for implementing the CSR Guidelines lies with the CEO in collaboration with the executive management. The CSR Guidelines shall be distributed to all employees, managers and board members and shall also be referred to in the company's employment contracts and personnel handbook.

All employees, managers and board members shall carefully read the CSR Guidelines

The Board of Directors is responsible for updating the CSR Guidelines. The status of the activities related to this CSR Guidelines shall be reviewed annually by the board of directors.