



Code of Conduct

Our core values define who SK Life Science, Inc. ('SKLSI') is as a company and how we conduct our business. A fundamental tenant of our organization is that SKLSI has and will continue to uphold the highest levels of business ethics and personal integrity in all business transactions and interactions. To this end, this Code of Conduct ("Code") serves to:

- emphasize SKLSI's commitment to ethics and compliance with the law; and
- provide the basic standards of ethical and legal behavior.

SKLSI is committed to preserving the integrity of the U.S. healthcare system, to operate in compliance with applicable laws, and to demonstrate the highest ethical behavior possible in our interactions with our customers, suppliers, competitors and government agencies. We expect every employee, officer, director and contractor to read and understand this Code and its applicability to the performance of his or her business responsibilities. That said, SKLSI expects you to act in full compliance with this Code and in a manner consistent with the highest ethical standards.

1. Honest and Ethical Conduct

Integrity is the foundation of our company. SKLSI promotes the highest standards of honest and ethical conduct by conducting our affairs in an honest and ethical manner. The integrity of our company depends on the honesty and integrity of our employees, officers, and directors.

2. Legal Compliance

Compliance with applicable law and regulation is the basis of this Code. Our success depends on each of our employees, officers, and directors operating within applicable law and regulation. We expect each of our employees, officers, and directors to understand the legal and regulatory requirements applicable to their business areas of responsibility. While we do not expect you to completely memorize every law and regulation, we do expect you to be able to determine when to seek advice from others and to obtain that advice as needed.

3. Harassment and Intimidation

SKLSI prohibits sexual or any other kind of harassment or intimidation, whether committed by or against a supervisor, co-worker, vendor or visitor. Harassment, whether based on a person's race, gender, color, creed, religion, national origin, citizenship, age, disability, marital status, sexual orientation, ancestry, veteran or socioeconomic status will not be tolerated. You must never use company systems or property to transmit or receive electronic images or text of a sexual nature or containing ethnic slurs, racial epithets or any other material of a harassing, offensive or lewd nature. If you believe that you are being subject to such behavior, or if you receive or observe a complaint regarding such behavior, you should report this immediately to your supervisor, the Human Resources Department or the company's

legal counsel. SKLSI will promptly investigate all harassment or discrimination claims and take appropriate action, up to and including termination of employment or contracting relationship.

4. Drug-Free Work Place

To meet our responsibilities to employees, customers and investors, SKLSI must maintain a healthy and productive work environment. Misusing controlled substances, or selling, manufacturing, distributing, possessing, using or being under the influence of illegal drugs on the job is absolutely prohibited.

5. Safety in the Workplace

The safety of people in the workplace is of utmost importance. Each of us must comply with all applicable health and safety policies in order to maintain a healthy workplace.

6. Fair Dealing

SKLSI is committed to dealing honestly, ethically, and fairly with our customers, vendors, competitors and employees. No person may take advantage of another through abuse of confidential information, misrepresentation of materials facts or any other unfair practice. It is a violation of the law to engage in deceptive, unfair or unethical practices, or to make misrepresentations in connection with any sales activities.

7. Conflicts of Interest

We respect the right of our employees, officers, and directors to manage their personal affairs and investments and do not wish to impinge on their personal lives. However, we do expect that our employees, officers, and directors will avoid any conflicts of interest that occur when their personal interests may interfere in any way with the performance of their duties or the best interests of SKLSI. A conflicting personal interest could arise, for example, from an expectation of a personal gain or a need to satisfy a current or past personal obligation. We expect our employees, officers, and directors to be free from influences that conflict with the best interests of SKLSI or might deprive SKLSI of their undivided loyalty in business dealings.

If you have any questions about a potential on conflict, or if you are aware of an actual or potential conflict, please discuss the matter with the company's legal counsel.

8. Maintenance of Corporate Books, Records, Documents and Accounts

The integrity of our records depends on the validity, accuracy and completeness of the information supporting the entries in our books. Therefore, our corporate and business records should be completed accurately and honestly. The making of false or misleading entries, whether they relate to financial results, test results, or otherwise, is strictly prohibited. Any employee, officer, director or contactor who becomes aware of, or has reason to believe, that there may be any improper record keeping should immediately notify their supervisor, or the company's legal counsel.

In addition, you are prohibited from destroying any records that may be relevant to a violation of law or any litigation or any pending, threatened or foreseeable government investigation or proceeding.

9. Gifts and Other Benefits

Gifts and other benefits may not be offered, provided or accepted by any employee, officer, director or contractor in the course of business without the express permission of the company's compliance department. If approved, such gifts and other benefits must be consistent with customary business practices, and not be (a) of more than a token or nominal monetary value; (b) a cash equivalent; (c) susceptible of being construed as a bribe or a kickback; (d) made or received on more than an occasional basis; (e) pose a potential conflict of interest; (f) or be in violation of applicable law, regulations or industry guidance. Notwithstanding, occasional meals provided by our Medical Affairs or Commercial Departments to healthcare providers in certain circumstances are in compliance with our company policies.

10. Confidentiality

One of our most important assets is our confidential information. As an employee, officer, director or contractor of SKLSI, you may learn certain confidential information. We expect that you will comply with the confidentiality agreements executed by you. Any departure from the confidentiality agreement is ground for immediate termination of your employment or contracting relationship with SKLSI.

11. Compliance Standards

SKLSI has established a comprehensive compliance program that follows the "Compliance Program Guidance for Pharmaceutical Manufacturers", published by the Office of Inspector General, Department of Health and Human Services ("OIG Guidance").

The purpose of our compliance program is to prevent and detect violations of SKLSI policy as well as applicable laws, rules and regulations that guide the pharmaceutical industry. SKLSI, in keeping with OIG Guidance, recognizes that implementation of a compliance program may not eliminate all improper behavior; however, it is SKLSI's expectation that all employees will comply with the policies in our compliance program and our Code of Conduct.

Every employee, officer, director and contractor has the responsibility to ask questions, seek guidance, report suspected violations and express concerns regarding compliance with this Code. You can report Code violations or concerns on a confidential and anonymous basis by calling **833-490-0007** or going to www.lighthouse-services.com/sklsi. You may also email your concern to reports@lighthouse-services.com and include "SKLSI" in the subject. When we receive information regarding an alleged violation of this Code, we will evaluate the information, determine if it is necessary to conduct a formal inquiry and if so, initiate such inquiry or formal investigation. Where non-compliance is identified, we will take corrective action to prevent future violations and where appropriate, take disciplinary measures. Violations of this Code may result in disciplinary action up to and including termination of

employment or your relationship with SKLSI. Furthermore, violations of this Code may also be violations of the law and may result in civil or criminal penalties for you, your supervisors and/or the company.