

# LB Pharmaceuticals, Inc. Employee Handbook:

# **Code of Business Conduct and Ethics**

Issued on: May 15, 2023

At LB Pharmaceuticals, Inc. ("LB"), we believe in hiring great people to provide the highest levels of service to our customers. It has always been our practice to conduct ourselves with the highest standards of ethical behavior when it comes to interacting with each other and protecting our company's interests.

This document, the LB Code of Business Conduct and Ethics or 'Code of Conduct,' covers a wide range of business practices and procedures. It serves as a framework to help you understand the core philosophies of LB business and to guide you as you make on-the-job decisions.

As a LB employee, you are expected to comply with the Code of Conduct and any other applicable laws, regulations, expectations, policies, procedures and guidelines that apply to your position. Failure to do so may result in disciplinary action up to and including termination of employment.

#### USE GOOD JUDGMENT IN ALL SITUATIONS

We expect you to use good judgment when it comes to your interactions with other LB employees and vendors. The following pages contain important information and guidelines we have created to help you use good judgment. When we talk about using good judgment, it's really about how we treat each other and how we do business. If you have questions about what using good judgment means, talk with the CEO/CFO.

#### **OUR DOOR IS ALWAYS OPEN**

We value and encourage open and honest discussion, which is why our Open Door philosophy is such an important part of our culture. Clear, open, honest, and respectful communication is essential.

We want you to feel confident in discussing any issue with the person or people directly involved.

The following individuals are among those who can help you with any questions or concerns you may have:

- CEO/CFO
- Corporate Council (Andrew White. Attorney at Williams Mullen Ph: 804-420-6243)



In the event you become aware of illegal or unethical behavior, immediately report it to one of the above individuals.

#### RETALIATION IS NOT PERMITTED

We do not permit any retaliation of any kind against employees who report possible misconduct, raise a concern regarding a violation of this Code of Conduct, participate in an investigation or otherwise engage in legally protected activity. Anyone who retaliates will be subject to disciplinary action, up to and including termination of employment.

If you feel you have been subject to retaliation, immediately contact the CEO/CFO or Corporate Council (Andrew White)

#### **TECHNOLOGY USE**

Technology is an important part of how we serve our customers and encourage employees to leverage the technology available. The LB technology tools used to perform LB work — including LB -provided devices or applications that allow employees to connect to the LB network or access data from personal — devices are company resources and are provided for business purposes only.

You are expected to use good judgment when using LB -provided technology, including but not limited to:

- Access to the Internet
- Social networking/media tools
- Software and software tools
- Communication methods such as email, texting, secure e-mail and voice mail
- Approved personal or company issued devices, including smart phones and other mobile devices that access the LB Network
- Private web-based email accounts such as Hotmail, Gmail, Yahoo, etc. that you may access through company-provided technologies
- Information that is retrieved and stored in company-owned hard drives or in temporary intranet files

You may only use authorized tools and processes to store personal information, confidential financial data or other non-public proprietary company information.

We have a legitimate business need (including to ensure compliance with LB policies, including this Code of Conduct) to access, review, copy, move or delete the content and information carried by these technologies at any time and without notice, and by using these technologies, you understand and agree that LB retains the right to do so. You are permitted to use these technologies for limited and reasonable personal use provided such use does not interfere with your duties. However, any such



personal use is governed by all applicable LB policies including this Code of Conduct. Employees should not expect privacy when using these resources, including when accessing remotely.

All LB guidelines apply to the use of technology. These include, but are not limited to our expectations regarding harassment, discrimination, retaliation, sexual harassment, violence in the workplace, privacy and non-public, proprietary company information. Discriminatory, unethical and/or inappropriate behavior when using these technologies or social media will not be tolerated.

Please take special note of New York Penal Law 245.15, Unlawful Dissemination or Publication of an Intimate Image as well as NYC Administrative Code 10-180 (10-177\*3). Together, these laws prohibit anyone from disseminating, either by text, email, social media or any other electronic format, sexual, naked and/or intimate images without consent to friends, colleagues, employers, and family members. This also includes uploading to the internet on sites including Reddit, Instagram, Youtube, Facebook or even Pornhub. Any violation of either New York Penal Law 245.15 or NYC Administrative Code 10-180 (10-177\*3), whether or not this takes place within New York State, will constitute a violation of the LB Code of Conduct and be grounds for your immediate dismissal.

LB manages our business records and information, both written and electronic, as part of our normal course of business in compliance with LB policies and applicable regulatory and legal requirements.

#### TECHNOLOGY USE WHILE DRIVING

LB expects employees to exercise good judgment at all times including when driving on company time or conducting business while driving. Cell phone or other types of mobile device usage while driving can increase the likelihood of an accident causing injury to oneself or others. Use of a cell phone or other mobile devices in any capacity while driving is not required by LB. LB expects employees to avoid unnecessary use of such devices while driving, even where use is not restricted by law.

To the extent possible, you should only communicate on mobile devices when safely parked. If you must make a call while driving, we expect you to use hands-free devices, keep the calls brief and exercise extreme caution.

#### SOCIAL MEDIA AND BLOGGING

We recognize that many of our employees use social media tools as another way to connect and share information about LB.

Whether or not you are acting on behalf of LB, or using your personal social media accounts or blogs to talk about our products or our business, always use good judgment and follow these guidelines:

- Do not post sensitive, private or confidential company information
- Do not post comments about a coworker, or vendor or any identifiable group of individuals could be perceived as harassing, threatening, retaliatory, hateful or discriminatory. An example



of the above would be Tweeting the following "People from Idaho are all stupid jerks." Or "Italians have no idea how to drive on a two-lane highway."

 Do not post photos or videos that are in violation of the aforementioned New York Penal Law 245.15, Unlawful Dissemination or Publication of an Intimate Image as well as NYC Administrative Code 10-180 (10-177\*3).

Please note that LB maintains for the benefit of all, one or more LB only chat rooms on Twitter. Some of these rooms are meant for the use of one or more teams of employees and some rooms are for all employees. You will be invited to one or more of these rooms based upon your position within LB.

Under no circumstances are you to copy and send to third parties any transcript, photos, or other material from these internal rooms without prior explicit permission from LB's CEO/CFO.

Lastly, under no circumstance are you to use any of these rooms to harass, demean, or purposely insult any LB employee, employee family member, consultant, advisor, or any other LB affiliate.

In addition to the guidelines above and in this Code of Conduct, you must follow all other LB guidelines and expectations, including the Privacy Policy and Privacy Trainings. Failure to comply may result in disciplinary action up to and including termination of employment.

#### WE TREAT EACH OTHER WITH RESPECT

At all times when communicating of behalf of LB, you are to maintain professional decorum and never act in a way that would lead a third party to feel as if you are intending to degrade, dehumanize or disrespect. Always assume that any communications you have with others as part of your role at LB reflects onto all of your fellow coworkers.

# EQUAL EMPLOYMENT OPPORTUNITY PHILOSOPHY

Our people are the foundation of who we are as a company. Attracting, hiring and retaining diverse talent enables us to be more innovative and better serve our employees, customers and communities.

We uphold our tradition of valuing our employees and are an equal opportunity employer committed to recruiting, hiring, training and promoting qualified people of all backgrounds, regardless of actual or perceived sex; race; color; religious creed; national origin; ancestry; age; marital status; pregnancy; nursing mother status; physical, mental or sensory disability; medical condition; genetic information; sexual orientation; gender (including gender identity or expression); military or veteran status; or any other basis protected by federal, state and/or local laws.

#### **EMPLOYEE ACCOMMODATION**

Please contact the CEO/CFO if your ability to perform the expectations of your job is impacted by your pregnancy, disability, or religion. We will partner with you to determine if there is a reasonable accommodation we can provide, such as an accommodation to enable you to perform the essential



functions of your job. If you are unable to perform the essential functions of the job, even with a reasonable accommodation, we encourage you to ask the CEO/CFO for support in identifying other available positions at LB for which you may be qualified or any other reasonable accommodation options such as a leave of absence.

You have an obligation to assist and cooperate in the accommodation process. The process has the best chance of success if you advise management of your need for accommodation and continue to work collaboratively and in good faith with us during the accommodation process. As part of this obligation, you are expected to have ongoing communication with LB, including during absences, and provide and facilitate timely responses to LB requests for relevant information about your accommodation needs.

#### WE DO NOT PERMIT HARASSMENT OR DISCRIMINATION

At LB we strive to create an inclusive, supportive environment. To that end, we do not permit discrimination or harassment of any kind by any supervisor, manager, coworker and/or third parties. This includes, but is not limited to, discrimination or harassment based on actual or perceived sex; race; color; religious creed; national origin; ancestry; age; marital status; pregnancy; nursing mother status; physical, mental or sensory disability; medical condition; genetic information; sexual orientation; gender (including gender identity or expression); military or veteran status; or any other basis protected by federal, state and/or local laws. Any unwanted and/or unwelcome behavior — whether it is physical, verbal, in person, written, or through email, social media, or other technological means — that creates an intimidating, hostile or offensive environment is prohibited.

If you experience or observe any behavior you believe is discriminatory or harassing, you should report it immediately to CEO/CFO or any manager. In addition, managers and supervisors must report any such complaints to HR so that they can be addressed immediately. Complaints, written or verbal, will be investigated as promptly and as confidentially as is reasonable. LB prohibits retaliation for reporting or participating in an investigation of harassment or discrimination. LB will take corrective action when appropriate, up to and including termination of employment. LB will inform the complaining employee either verbally or in writing of the outcomes of its investigation when appropriate.

# Sexual Harassment is a Serious Matter

We do not permit harassment of any kind and that includes sexual harassment by or against employees, vendors or customers. Sexual harassment may include threats or insinuations that an employee's refusal to submit to sexual advances will adversely affect that person's employment, evaluation, wages, advancement opportunities, assigned duties or any other conditions of employment or career development.

Sexual harassment can also be sexual advances, requests for sex, or unwelcome verbal or physical conduct based on sex that interferes with an employee's work performance or creates an intimidating,



hostile, humiliating, or sexually offensive work environment. While it is impossible to list all types of behavior that could be sexual harassment, some examples are:

- Unwanted and/or unwelcome sexual comments, advances, flirtations or propositions.
- Verbal abuse of a sexual nature, including sexually oriented jokes or comments or questions regarding one's sexual experience, activity or prowess.
- Comments about an individual's sexual attractiveness.
- Display of sexually suggestive objects or pictures or making sexually suggestive gestures.
- Requesting of another coworker, consultant, vendor, patient or any other affiliate of LB to share with you any image, whether a still photo or video, comprising an intimate image as defined by either New York Penal Law 245.15, Unlawful Dissemination or Publication of an Intimate Image as well as NYC Administrative Code 10-180 (10-177\*3).

LB prohibits these acts and any other acts that constitute sexual harassment.

#### KEEP OUR WORKPLACE FREE FROM VIOLENCE

As part of our goal to provide a safe environment for our employees and customers, LB prohibits any kind of threat, intimidation or act of violence in the workplace.

Threats — either direct or implied — may include words, gestures, phone calls, emails, text messages, social networking/media messages or posts and drawings.

Intimidation, threats and violence may also arise out of non-work situations, for example, domestic abuse or relationship breakups. These situations may impact our workplace, including your safety or the safety of coworkers or vendors. LB is committed to working with employees who are victims of domestic violence to prevent abuse and harassment from occurring in the workplace. LB is also committed to managing the risk these situations may pose to other employees.

As an employee, you play a critical role in maintaining a culture of safety. You must immediately notify the CEO/CFO of any threats, intimidation and/or acts of violence (including threats to harm oneself) as soon as possible so that we can evaluate and implement appropriate safety procedures to help ensure a safe and secure workplace. LB will address any threats or concerns as promptly and confidentially as is reasonable. Remember, we cannot take steps to help create a violence-free workplace unless we are aware of situations that could lead to the risk of violence in the workplace. You are also responsible for:

- Cooperating with an investigation into any risk of violence in the workplace.
- Providing CEO/CFO with a copy of any temporary or permanent restraining/protection orders that identify you, any LB employee as protected.
- Not bringing potentially dangerous items including weapons into the workplace with you. Weapons of any kind are not allowed in our workplace for any reason.



LB cares about the well-being and safety of our employees. You should contact the CEO/CFO if you need time away from work due to a domestic abuse situation.

#### **WORKING SAFELY**

We all share responsibility for our own safety and the safety of our coworkers and customers.

You are responsible for making safety a priority and performing your duties according to general safety practices. You are also responsible for complying with all job-specific safety best practices. We will communicate safety performance openly with you, and we expect you to inform the CEO/CFO anytime you come across a situation or condition you believe might jeopardize your safety or the safety of others. Failure to follow safety practices or to report safety violations may result in discipline up to and including termination of employment.

# DRUGS, ALCOHOL AND TOBACCO LIMITATIONS IN THE WORKPLACE

We believe LB should be a safe, efficient and productive place to work. For that reason, employees must work free from the effects of drugs and alcohol.

LB prohibits having, using, or being under the influence of drugs (including drug paraphernalia) during your shift (including meal and rest periods), while attending company events, or while otherwise representing the company. For the purposes of this policy, 'drugs' includes: (1) any illegal drug; (2) any over-the-counter or prescription medication that is obtained illegally or is used contrary to its prescribed dosage or purpose; and (3) marijuana.

LB also prohibits employees from consuming or being under the influence of alcohol during their shift (including meal and rest periods), while attending customer events, or while otherwise representing the company.

If LB determines that an employee has violated this policy or if an employee is perceived to be under the influence of drugs or alcohol during a shift (including meal and rest periods), while attending events, or while otherwise representing the company, LB may take disciplinary action, up to and including termination of employment.

Should you have a substance abuse issue our Resources for Living Program is available to provide confidential support and appropriate resources. Talk with CEO/CFO if you need time away from work to attend a rehabilitation program. However, please also be aware that if a problem with your job performance exists, we will address it with you, regardless of any substance abuse issue you may have.

LB employees are prohibited from smoking of any kind on company property except in designated smoking areas. This includes the use of lighted, battery-operated or electronic smoking or similar devices.



### THEFT, FRAUD, AND OTHER CRIMINAL BEHAVIOR

Criminal behavior, theft of LB merchandise, money, sales or other property, and fraudulent transactions are prohibited.

### TRAVEL POLICY

The Company's policy on business travel and employee reimbursements is attached as Exhibit A. Please familiarize yourself with the policy and its ramifications on any travel you may take on behalf of the company. If you have any questions regarding the policy, or would like to apply for a written exception to one or more of the policies due to personal health or a particular family situation, please contact either the CEO or CFO at least 21 days prior to expected date of travel.

#### **EMPLOYEE INFORMATION**

LB is committed to respecting your privacy.

We take great care to protect your personal information and require that you do the same by not misusing the personal information of other employees. Personal information about employees includes information such as Social Security numbers, dates of birth and health information. We have safeguards in place to limit access to your personal and health information, and we retain and safeguard personnel records.

#### WE DO BUSINESS WITH INTEGRITY; PROTECT LB, ITS INTERESTS AND PROPERTY

To protect LB, its interests and its property, you must comply with all applicable governmental laws, rules and regulations when you are conducting business on behalf of LB. You also must avoid engaging in conduct that, even though legal, is inconsistent with LB's policies or ethical principles. This means that you must ensure that you do not use LB's property, funds, personnel, time, facilities or equipment for your own personal use or gain. This also means that you must return to LB at the end of your employment any LB property, equipment or sensitive, personal or confidential information as defined in these guidelines that is in your possession or control.

You should also be aware that any business processes or opportunities you discover through your work at LB belong to LB, not you, and may not be disclosed or used for personal gain. Similarly, LB shall be the exclusive owner if you make a discovery, develop or create any invention, design, process, concept, formula, tangible work of design or authorship, or similar creation using LB's resources or confidential information in the course of your employment.

Information about company performance that has not been made public must also be kept confidential. Be especially alert if someone asks you about the current pace of business, sales, our profitability or our strategies. Participating in these discussions can result in an inadvertent but nevertheless damaging, disparaging or illegal disclosure of information.



If you have any questions at all about what constitutes sensitive, personal or confidential business information or how to protect that information, please contact CEO/CFO.

### MEDIA, INVESTOR AND MARKET RESEARCH ORGANIZATION QUESTIONS

You can help us ensure that when we speak as a company, we speak with one voice, with a consistent message and through appropriate channels.

Only approved LB spokespeople may serve as a LB representative when speaking to the investment community, market research organizations or the news media (including newspapers, television, radio, magazines, blogs or online publications). This means non-approved employees may not respond to inquiries nor reach out to the investment community, market research organizations or the news media on behalf of or as a representative of the company. No LB employee should accept compensation for providing information about the company.

Under no circumstances are you to post on any social media your opinions regarding the future stock price or valuation of LB or any company whose primary business is developing therapeutics for psychiatric indications.

#### COMPENSATION FOR TIME WORKED

LB compensates you for all time worked, including time you spend outside of work on work-related social networking, emailing, phone calls, etc.

If your compensation is based upon an hourly rate, you are expected to accurately and completely submit all the time that you work. Even if this is not the case, you may be asked by LB management to provide a list of hours worked during such weekdays that you are employed.

LB is committed to paying employees accurately, including only making legally permissible deductions from employees' pay. Despite this commitment, mistakes can happen. We encourage you to request and review your electronic payslips each pay period to ensure they are correct. Please notify CEO/CFO immediately if you believe an error has occurred with respect to your pay, including if you believe an improper deduction has been taken from your salary or other pay. LB will investigate all concerns and will promptly make any required adjustments.

Should you choose to end your employment with LB, you must timely notify the CEO/CFO and your manager so we can ensure accurate and timely pay.

### ACCURATE AND ETHICAL ACCOUNTING

LB works hard to earn the trust of our customers, employees, vendors and other business partners by being honest and forthright in all aspects of our business, including compliance with all applicable



financial reporting and accounting rules and regulations. This trust is one of our most valuable assets. We want to assure you that we approach our accounting the same way we do the rest of our business.

It is possible that company directors, officers and employees may be called on to provide necessary information to ensure that LB's public reports and communications are complete, fair, accurate and understandable.

If requested of you, LB expects you to take this responsibility very seriously, with the same integrity expected of you on a daily basis. We also expect you to share in this responsibility for accurate and ethical accounting procedures by properly recording all transactions in accordance with LB procedures and by retaining or disposing of records in accordance with LB record retention policies.

LB has established procedures to respond to possible employee concerns about accounting-related practices. You are welcome to submit a complaint regarding accounting matters to the LB Board of Directors. Examples of concerns you should report are errors, fraud or misrepresentation in our accounting-related practices. Retaliation against you for making a complaint will not be tolerated. As with all other matters, our door is always open. Should you have questions or concerns regarding accounting, internal audit controls or auditing matters, contact:

- CEO/CFO
- Corporate Council (Andrew White. Attorney at Williams Mullen Ph: 804-420-6243)

#### AVOID CONFLICTS OF INTEREST

LB values fair and honest dealings with our customers, coworkers, vendors, competitors and other business partners.

We expect you to uphold these values by avoiding conflicts of interest.

A conflict of interest can include activities, investments or associations that compete with LB, that interfere with your judgment on behalf of LB or exploit your position with LB for personal gain. For example, a conflict of interest may exist if you or a member of your family is associated with one of LB's institutional investors or have ownership interest in a vendor that does business with LB.

You may work for another employer as long as it does not cause a conflict of interest or interfere with your job performance at LB. This applies to use of social media as well. For example, if you are asked by a direct competitor to post their product information on your blog in exchange for compensation, this is a conflict of interest.

You must report any actual, perceived or potential conflicts of interest to CEO/CFO. Officers should report actual, perceived or potential conflicts of interest to the Corporate Secretary, and members of the Board of Directors should report actual, perceived or potential conflicts of interest to the Corporate Governance and Nominating Committee.



#### WORKPLACE RELATIONSHIPS

You should avoid relationships or behaviors that create a real or perceived conflict of interest with your job performance or judgment at LB.

Any employee who has a close, personal relationship with an employee they supervise, or any relationship that could create a real or perceived conflict of interest, must immediately disclose the relationship to the CEO/CFO so that appropriate action may be taken. Failure to promptly disclose such relationships or other related poor judgment may lead to disciplinary action up to and including termination of employment.

TALKING ABOUT WAGES, HOURS AND WORKING CONDITIONS AND OTHER CONDITIONS OF EMPLOYMENT

You are free to discuss, debate, criticize and share with others information about your and other employees' wages, hours, working conditions, conditions of employment and other personal information in support of your rights or as part of efforts under Section 7 of the NLRA and federal, state and/or local laws. LB will also not take any action to impede an employee from communicating with any regulatory or self-regulatory organization or agency such as the Securities and Exchange Commission or OSHA. Nothing in this Code of Conduct, including the references to the protection of private and personal information in the Customer Information, Technology Use, Social Media Policy and Employee Privacy and Protect LB Its Interests and Property sections, is intended to impact or restrict these rights. LB will not discipline, retaliate, or terminate your employment for exercising these rights.

## AT-WILL EMPLOYMENT

Nothing in this information constitutes an employment contract. Your employment with LB remains atwill, which means that both you and LB reserve the right to end the employment relationship at any time, with or without notice, with or without reason, other than delineated in an effective employment contract between LB and yourself.

#### **WAIVERS**

LB takes compliance with the principles laid out in this Code of Conduct very seriously, and any waivers of strict compliance will be made in limited, special circumstances. For LB's principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions, any waiver will require prior approval of either the Board of Directors or the Corporate Governance and Nominating Committee, along with prompt disclosure to shareholders.

#### **GROOMING AND DRESS STANDARDS**

It is in everyone's best interest for all employees of the Company to present a professional image to customers, clients and the public. Cleanliness is an essential part of providing this image. A neat, clean,



businesslike appearance is a requirement for all jobs. In most instances, you may wear your hair the way you choose while working as long as it remains well trimmed, well groomed and businesslike in appearance. All employees are expected to dress in a manner consistent with good hygiene, safety and good taste. Office personnel are required to wear clothes appropriate to a business office environment. At all times, employees are required to dress within the bounds of good taste (e.g., shorts, logo/souvenir type tee-shirts, tank tops, distressed (worn-out looking) or torn jeans or dungarees, and suggestive/provocative type clothing are prohibited.)

### **EQUAL EMPLOYMENT OPPORTUNITY**

The Company believes that all persons are entitled to equal employment opportunities and does not discriminate against its employees or applicants because of actual or perceived age, race, sex, color, ancestry, national origin, marital status, military and veteran status, registered domestic partnership status (as defined in California by California Family Code § 297), medical condition (including genetic information and characteristics), political affiliation, physical disability or mental disability, citizenship, religion, creed, religious dress and grooming, pregnancy or related condition, breastfeeding or a related condition, sexual orientation, gender expression, gender identity or on the basis of any other classification protected by state, federal or local laws. Equal employment opportunities will be extended to all persons in all aspects of the employer-employee relationship, including recruitment, hiring, upgrading, training, pay, promotion, transfer, discipline, layoff, recall and termination. All Equal Employment Opportunity questions should be directed to the CEO/CFO.

#### DISABILITY DISCRIMINATION

The Company is also committed to providing equal employment opportunities to otherwise qualified individuals who have a disability, a record of a disability or are regarded as having a disability. We will provide reasonable accommodation to such individuals to the full extent required under the Americans with Disabilities Act, and any applicable state or local law, regulation or ordinance. If you require a reasonable accommodation, you must notify your supervisor. We will then engage in an interactive process with you to attempt to determine what type of reasonable accommodation would be effective. Your suggestions and input throughout that process are encouraged. Under certain circumstances, we may ask you: (1) to provide documentation (to the extent permitted by law) from a licensed health care provider confirming your inability to perform an essential function of your job without reasonable accommodation; or (2) if such documentation is necessary and is not available, to visit an appropriate health care professional of our choice to substantiate the existence of a disability and the need for reasonable accommodation.

# FAMILY AND MEDICAL LEAVE

The Company will grant family and medical leaves of absence in accordance with the federal law known as the Family and Medical Leave Act ("FMLA"). Employees must contact the CEO/CFO as soon as they become aware of the need for a FMLA leave.



#### DISCIPLINARY ACTION

Any employee who willfully fails to comply with or violates any of the safety rules, regulations or Company policies set forth in Sunrise Company's Safety Programs and/or Code of Safe Practices shall be subject to disciplinary action including, if deemed necessary, termination. Senior Management and department supervisor will determine the disciplinary action required.

#### PERFORMANCE REVIEWS

An attempt to review each employee's job performance with the employee will be made by his immediate supervisor annually. If the employee receives a written evaluation, the original form will be placed in the employee's personnel file. Some departments of LB schedule additional reviews. This method will provide each employee with an opportunity to note major accomplishments and progress as well as performance concerns and areas for improvement.

#### PROMOTIONS AND TRANSFERS

LB encourages employees to apply for promotions to positions for which they are qualified. Promotions and transfers will be based on the ability, qualifications and potential of the candidates for the positions. Employees who are interested in transferring to another position should contact their immediate manager and thereafter either the Human Resources Department or CEO/CFO provided they have completed six months of employment. All promotions and transfers are at the sole discretion of management.

#### IN CLOSING...

You are part of a legacy of talented individuals who work together to provide the highest level of value to our shareholders, partners and patient community. Throughout your career at LB, you'll face many new challenges and opportunities. As you rise to meet the challenges and take advantage of the opportunities, we ask that you follow the philosophy LB was founded upon: use good judgment in all situations. Doing so will empower you to provide outstanding service every day. Use the information included in the Code of Conduct and other position-specific expectations to guide your decisions. You are expected to comply with the Code of Conduct and all other LB policies. Because LB is constantly growing and changing, this Code of Conduct may be revised from time to time without notice. For this reason, employees should access the Code of Conduct from <a href="https://www.lbpharma.us/aboutus">www.lbpharma.us/aboutus</a> to ensure they are receiving the most current information about the Code of Conduct. And if you are ever in doubt or see something that doesn't look like good judgment, reach out to the CEO/CFO — we are here to help.