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## KHIRON LIFE SCIENCES CORP. CODE OF ETHICS AND BUSINESS CONDUCT

### INTRODUCTION AND APPLICATION

The code of ethics ("Code") of KHIRON LIFE SCIENCES CORP (the "Company" or "KHIRON") communicates the values, responsibilities and rules of conduct that govern the activities of the Company and its affiliated companies.

This Code is compulsory for all directors, officers, and employees of Khiron and its affiliated companies and constitutes a commitment and obligation to comply with each of the guidelines indicated in this Code.

All questions relating to this Code are to be addressed to your manager or the Legal Department who shall consult with members of the Company's Ethics Committee, as appropriate.

### PURPOSE OF THE CODE.

The Code is intended to document and communicate to the employees, officers and directors and collaborators, as well as all third related parties, about the principles of conduct, values, responsibilities and ethics that govern the activities of Khiron Life Sciences Corp. and its subsidiaries (collectively, the "Company") within the parameters of personal, collective and entrepreneurial behavior and within the principles established by the Company.

The purpose of the Code is to:


- i. Promote honest and ethical conduct, including the avoidance of actual or apparent conflicts of interest in the Company's business activities.
- iii. Promote full, balanced, accurate and timely disclosure to shareholders and securities regulators, including news releases and publicly filed documents, in compliance with applicable laws and regulations.
- iv. Promote compliance with applicable governmental laws, rules and regulations.
- vi. Promote accountability for adherence to this Code, including reporting violations of this Code.

### CORPORATE VALUES.

The Company's corporate values will be as follows:

- Security is our seal of confidence: we work for the well-being of people and their environment. We do not put your safety at risk.
- We have integrity: we achieve goals without cheating.
- We transform life: we are here to understand and improve the quality of life of people and their environment.

PRODUCED BY	REVIEWED BY	APPROVED BY
<b>Name:</b> Angela Acosta	<b>Name:</b> Livia Maduri	<b>Name:</b> Board of Directors
<b>Position:</b> Legal Leader	<b>Position:</b> General Counsel	<b>Position:</b> Board of Directors
<b>Date:</b> 04/11/2021	<b>Date:</b> 04/11/2021	<b>Date:</b> 04/11/2021

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- We surprise and create value: we will always exceed the expectations of our patients, clients and consumers.
- We challenge ourselves and make a difference: to be the best we cannot be complacent.
- We inspire collectively: we always inspire our talent, to increase our ability to deliver as a team.
- We are constantly innovating scientific research and innovation leverage the achievement of our objectives.

### **CONFLICTS OF INTEREST**

KHIRON employees may not, directly or indirectly (including beneficial owners through or by means of any family members and/or affiliated persons) hold, develop, have corporate participation, or have a particular and direct interest, in commercial activities that are similar to those developed in the company's corporate purpose without express, written and prior approval of the Company's CEO. This prohibition includes having an interest in capital, participation in profits, stock options, commissions, labor or consulting relationship, participation in boards of directors or other commercial or personal interests in any company in the medical cannabis industry.

Passive investments in any other companies in the medical cannabis industry that occur through directors, officers, and employees' investments in mutual funds, exchange trade funds, or any other fund of this type, without the directors, officers, and employees, will be allowed.

No Worker may derive any personal gain or benefit from marketing any of KHIRON's products.


### **EXCLUSIVITY**

Full-time employees will have obligations of exclusivity under the terms indicated in their employment contracts, and may not, under any circumstances, perform work that is their responsibility for another employer, or enter into an informal service relationship in which they perform the same work that is the subject of their employment contract.

### **CONFIDENTIALITY**

Directors, officers and employees shall protect the Company's Confidential Information from unauthorized access, disclosure and use. Confidential Information is understood to mean non-public information including but not limited to: all processes, methods of operation, data, graphics, visual, verbal or written information, financial information, customer and supplier lists, intellectual property, currency or customs declarations, financial statements, business projects, contracts, trade secrets, judicial or administrative actions, security policies, patents and inventions, know-how (understood as non-patented knowledge) and software developed or licensed by the company (all of the foregoing referred to globally as the "Information" for purposes of this Code).

Confidential Information may only be disclosed in furtherance of KHIRON's business and pursuant to a Confidentiality or Non-Disclosure agreement, by persons authorized by their functions, or when disclosure is compelled under applicable law.

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Negligent disclosure of confidential information is no less harmful to the Company than intentional disclosure, so employees should be careful not to talk about projects, jobs or customer and patient information in public places such as restaurants and cafes, and even in the hallways of the company if people unrelated to the information being discussed are nearby. Employees must not leave portable devices including mobile phones or laptop computers with Company Information in public lockers, parked vehicles or in the care of third parties. Portable devices and laptop computers containing Company Information must always be password protected and locked when unattended.

Employees are prohibited from keeping confidential information of KHIRON or its customers, patients or other third parties with whom the company has a business relationship in their personal files.

This obligation of confidentiality survives the termination of the employment or service agreement with the Company, for so long as the information remains non-public.

If there are questions about the handling of Confidential Information, the Legal Department should be consulted prior to any use or disclosure.

In the same way, KHIRON respects the confidential and privileged information of third parties, their intellectual and industrial property rights, as well as all its employees, and for this reason the use of such information for the benefit of the Company is not allowed if it has not been obtained with the express authorization of its owner. Employees must comply with obligations of confidentiality towards their former employers. No director, officer or employee shall induce any person to breach obligations of confidentiality owed to third parties.

## **GIFTS AND ENTERTAINMENT**

Company employees, officers and directors, and their relatives, may not request or accept payments of money or anything of value from any government officials, customers, suppliers or others with whom the Company does business, has done business, or may have occasion to do business. Employees may not accept:

Compensation in any form (cash, kind, credit, etc.).


Payment for or provision of travel or accommodation.

Entertainment including, but not limited to, tickets to sporting and other events, business meals, and other business-related entertainment activity (golf, tennis, etc.) unless approved in advance by your supervisor or a member of the Company's Legal Department or ancillary to a legitimate business meeting attended by the person or company providing the entertainment.

Gifts of any kind, nature, or description whose value exceeds USD\$100 or could have the appearance of being a bribe, kickback or payoff. For guidance on gifts that do not meet these criteria, please contact a member of the Company's Legal Department.

## **INSIDER TRADING AND TIPPING**

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All directors, officers and employees are prohibited buying or selling securities of the Company, or the securities of any other entity with whom the Company conducts business, while in possession of material confidential information about the Company or the other entity (meaning information that significantly affects, or would reasonably be expected to have an effect on, the market price or value of the Company's securities). Pursuant to this Code, you are also prohibited from communicating such confidential information to others who might trade securities based on that information ("Tipping"). Such acts could result in criminal prosecution of the individual and the Company, or result in serious fines or penalties. (See the Company's Insider Trading Policy.)

### **NON-DISCRIMINATION, SOCIAL INCLUSION AND RESPECT**

Any type of discrimination, exclusion or distinction based on gender or gender expression, sexual orientation, religion, race, nationality, disability, age, family status, marital status, among others, are behaviors that the Company rejects and prohibits towards and among employees and third parties. KHIRON promotes the free development of the personality, well-being, equality and dignity of its employees and the communities where the Company operates.


KHIRON employees must relate to each other with respect, promoting a good, safe and healthy working environment. Any violence or harassment of another Worker is prohibited.

### **HUMAN RIGHTS**

KHIRON's fundamental principle is respect for human and children's rights, and it is against the practices of child labor and slavery, which are strictly prohibited and unacceptable in the Company. Khiron will not engage in commercial relationships with third parties that use child labor or slave labour.

KHIRON is committed to respecting and protecting human rights and public freedoms as recognized in the Universal Declaration of Human Rights and all international principles and treaties promulgated in this regard. In this regard, Khiron commits itself to the following, which is inclusive but not limiting:

- Respect the freedom and equality of all its employees and people with whom Khiron has interaction or inheritance.
- Do not discriminate in any way based on race, color, sex, language, religion, political opinion, economic status, among others.
- Respect life and protect it and recognize the legal personality of people.
- Reject outright any cruel, inhumane, degrading treatment, form of torture or slavery.
- To presume the innocence of any person until proven guilty according to law.
- Do not arbitrarily interfere with the privacy of your employees.
- Guarantee freedom of thought, conscience, opinion, expression, religion, and freedom of union or association (including freedom to join a trade union).
- To guarantee the right to social security for its employees and other collaborators.
- Guarantee the right to work, without discrimination and with equitable remuneration.
- To guarantee the right to rest and enjoy free time for its employees.
- Respect the right to education.

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- Respect the right to take part in the cultural life of the community, to enjoy the arts, to participate in scientific progress and the right to protection of moral and material interests.
- Recognize and act upon the duty you owe to your employees and the community.

## **PROTECTION AND USE OF ASSETS, FACILITIES AND RESOURCES**

It is the responsibility of employees to protect and properly use the Company's assets, resources, and facilities. This includes the use of all communication elements and tools such as internet, telephones, computer equipment and other computer, office, and technological tools, as well as all types of goods used in the production and quality control processes.

Company property shall only be used for the furtherance of the employee's job function and shall not be used, unless expressly authorized, for personal purposes. Likewise, employees shall not withdraw, damage, or deliberately allow a third party to withdraw or damage said resources and other assets of any kind that have been entrusted to them by reason of their position.

The Company's furniture and equipment including cellular devices, regardless of their condition, may not be loaned, sold, rented, destroyed, or given away; for all purposes, the prior written authorization of the Company is required. Employees shall exercise appropriate care for Company property in their use.


## **COMPANY RECORDS**

Employees, officers, and directors must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. Accurate information is essential to the Company's ability to meet legal and regulatory obligations.

All Company books, records and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The financial statements of the Company shall conform to generally accepted accounting rules and the Company's accounting policies. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation.

## **INTELLECTUAL PROPERTY**

All products, inventions, improvements, techniques, designs, materials, methods, or processes related to the business, products or services of the Company and which have been created or developed by KHIRON employees, consultants while employed by the Company("Developments"), besides being confidential, are the exclusive property of the Company. If the employee acquires any rights or interests in such Developments or in any intellectual rights relating to the Developments, the employee agrees to unconditionally assign all such rights and interests to the Company. The employee shall, both during and following the term of employment by the Company, execute all documents and do all other acts necessary to enable the Company to protect its rights in the Developments.

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Employees shall not infringe the intellectual property of third parties and shall not incorporate the intellectual property of third parties into the products and services of the Company except under license from the owner.

It is the obligation of every employee to inform KHIRON's Human Resources and Corporate Talent department about any theft, plagiarism, copy or misuse of the systems, procedures, methods and in general intellectual property of the Company of which they become aware.

### **PATIENT AND CUSTOMER RELATIONS**

All Company employees, especially those who work directly with clients and patients, must encourage the delivery of services in an atmosphere of respect, kindness, and transparency, providing timely and accurate information, according to the needs of the client.

In the same way, our clients are expected to share our principles. Given the above, if it is determined that a client is involved in illegal or unethical acts that violate this Code, the appropriate processes must be initiated to terminate the business relationship.


Likewise, KHIRON employees are prohibited from establishing commercial links or relationships of any kind with natural or legal persons reported in the money laundering and terrorism control lists such as the UN, OFAC or others, which are binding for Colombia.

KHIRON does not pay to buy business. Company employees, officers and directors, and their relatives, may not do payments of money or anything of value to any government officials, customers, or others with whom the Company does business, has done business, or may have occasion to do business. Employees may not give:

- Compensation in any form (cash, kind, credit, etc.)
- Payment for or provision of travel or accommodation.
- Entertainment including, but not limited to, tickets to sporting and other events, business meals, and other business-related entertainment activity (golf, tennis, etc.) unless approved in advance by your supervisor or a member of the Company's Legal Department or ancillary to a legitimate business meeting attended by the person or company providing the entertainment.
- Gifts of any kind, nature or description whose value exceeds USD\$100 or could have the appearance of being a bribe, kickback or payoff. For guidance on gifts that do not meet these criteria, please contact a member of the Company's Legal Department.

### **RELATIONSHIP WITH SHAREHOLDERS**

The relationship between shareholders and management will be carried out in accordance with the parameters established in the Company's articles, bylaws, applicable laws and rules of the TSXV, and in line with good governance, transparency, ethics and timely communication practices described more fully in the Company's Disclosure Policy.

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### **RELATIONSHIP WITH SUPPLIERS AND CONTRACTORS**

KHIRON seeks to give opportunity to all suppliers, without generating false expectations. The selection of suppliers is based on criteria of quality, price, transparency, long-term relationship, compliance, and competitiveness. Suppliers and contractors will be chosen based on objective criteria.

Suppliers and contractors must ensure that their activities are conducted in accordance with applicable laws, in compliance with contractual terms, and in compliance with applicable sections of the Code.

Employees observing behavior that is not in line with the Code have a duty to initiate the corresponding actions to correct the situation.

It is prohibited to make payments in the name of KHIRON other than payments made for goods and services in the ordinary course of business, or to give gratuities to suppliers or contractors, either directly or indirectly, that could have the appearance of being a bribe, kickback or payoff.

Likewise, employees are prohibited from making private arrangements with the Company's suppliers or contractors for their own benefit.

Unauthorized private agreements with suppliers or contractors, to obtain favorable advantages for the Company, are also prohibited.

### **RELATIONSHIP WITH THE COMMUNITY IN THE AREA OF INFLUENCE**

For KHIRON, it is of utmost interest to maintain a strong relationship with the communities in its area of influence. Therefore all KHIRON workers who have contact with the community and whose work impacts the community, are committed to creating relationships based on trust, transparency of information, awareness of requests, respect and collaboration.


### **RELATIONSHIP WITH AUDITORS**

No director, officer or employee, shall, directly or indirectly, make a materially false or misleading statement or omit to disclose a material relevant fact, to an accountant in connection with any audit, review or examination of the Company's financial statements.

### **RELATIONSHIP WITH COMPETITORS**

KHIRON's principle is to have transparent quality and innovation practices for the products and services it offers and provides. No comparative advantages are obtained from illegal, prohibited, or restrictive practices of competition. Such actions include obtaining confidential information from the Company's competitors that has not been officially published or authorized for delivery.

Likewise, price agreements, manipulation of supply or prices, and other behaviors stipulated in the respective laws are considered illegal practices, and therefore such practices will be sanctioned in accordance with the law. However, agreements with potential competitors will be possible as permitted by law.

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Non-compliance with the rules of free competition and unfair competition generates serious civil and criminal penalties for KHIRON.

### **CORRUPTION, BRIBERY, EXTORTION AND MONEY LAUNDERING**

KHIRON rejects any act of corruption, so bribery and extortion are prohibited, both for negotiations with third parties or within the company, as well as for establishing personal or commercial relationships with organizations outside the law. Likewise, it is prohibited to promise, offer, pay, deliver, demand, or receive any amount of money or recognition in kind, directly or indirectly, to or from a third party without complying with the authorization levels established in accordance with the Company's processes.

All activities developed must be based on the principle of transparency and in compliance with the Company's Anti-Bribery and Anti-Corruption Policy and Anti-Money Laundering Policy.

KHIRON is committed to conducting its operations in a transparent and integrated manner. Under no circumstances is bribery and/or extortion allowed. If any employee of the Company is being subjected to bribery and/or extortion in his/her working relationships, inside or outside the Company, he/she must immediately report it to the Corporate Talent area who will also escalate this information to the corresponding areas of the Company.

Similarly, when the Company or any of its employees become aware of cases of extortion and/or bribery of third parties outside the Company, it will be their duty to report them to the Company, which must report them to the competent authorities.

Likewise, it is prohibited to carry out any transaction, operation or action aimed at hiding the origin of funds resulting from illegal activities including bribery, money laundering, terrorism or drug trafficking, in addition to all those that are against the law.


KHIRON. is committed to fully comply with anti-money laundering laws and regulations, as well as to implement relevant actions, mechanisms, regulations and/or policies to evaluate business relationships to ensure the integrity of the operations carried out.

No Khiron worker, subcontractor, agent, supplier, contractor, or any entity with which KHIRON has a relationship shall (i) do, tolerate or omit to do anything by unreasonably invoking or giving in to threats by the unlawful groups, (ii) receive, supply, administer, invest, finance, transfer, keep, transport, store or preserve any money or property from or to the unlawful groups, (iii) collaborate with or assist the unlawful groups, (iv) construct, assign, lease, make available, facilitate or transfer property for use by unlawful groups in any capacity, (v) paralyze, suspend or significantly diminish the performance of its contractual obligations by acting on instructions from unlawful groups, (vi) pay sums of money to extortionists, and (vii) refrain from reporting punishable acts.

### **INDUSTRIAL SAFETY AND HEALTH AT WORK**

It is a priority for the Company to prevent any type of labor incidents and to safeguard the safety and health of all employees, contractors and other third parties working in or entering the Company's premises. For this reason, everyone is responsible for creating safe working environments and demonstrating health and safety-oriented behavior.



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All KHIRON employees must be committed to and responsible for reporting any potential health and safety risks identified in the workplace, as well as stopping any work activity that is considered a risk.

It is the obligation of all employees to attend the training provided by the company to identify risks in the work environment, as well as to comply with the laws, rules and standards set forth in the Management System for Safety and Health at Work.

Likewise, they must comply with all biosafety protocols dictated by the national government during the health emergency caused by the Covid - 19, their ignorance, and in general, the ignorance and transgression of the rules of the Management System of Safety and Health at Work SG-SST lead to the termination of the employment contract unilaterally and with just cause.

## **ETHICS LINE**


All employees have a duty to report any violations of this Code. The Company will not discipline, discriminate against, or retaliate against any employee who reports in good faith a complaint or concern regarding any possible or suspected violations of this Code.

The Ethics line is a communication mechanism in which employees can report suspected or potential violations of this Code. Employees should contact the Ethics line even if they do not have all the facts or if they are unsure if there has been a violation. The reports, which may be anonymous if the reporter so wishes, should be made to the e-mail [ethicsfirst@khiron.ca](mailto:ethicsfirst@khiron.ca).

The following is a non-exhaustive list of possible violations that can be reported to the ethics line:

- Accounting misstatements or irregularities
- Antitrust violations
- Conflicts of Interest
- Environmental law violations
- Export/Import laws violations
- Drug trafficking, diversion, counterfeiting
- Fraudulent transactions
- Theft and misappropriation
- Health and safety violations
- Political contributions
- Insider Trading, Tipping and Securities Law violations
- Bribes, money laundering and kickbacks
- Abuse of the position held in the Company for personal gain
- Business practices against the interests of the company
- Unauthorized access, disclosure or use of confidential information
- Participation in illegal activities
- Falsification of corporate documents or forgery
- Improper gifts, payments, presents or favors

All reports will be documented and referred to appropriate personnel, who will determine whether an investigation is warranted. The identity of reporting individuals who are not anonymous but request confidentiality will be treated confidentially to the extent permitted or required by applicable laws. The identity of persons under investigation due to an Ethics line report will be kept

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confidential except as reasonably necessary to conduct the investigation, on a need to know basis. Personal data will be collected and processed in compliance with the Company's Privacy Policy and applicable laws.

## **ETHICS COMMITTEE**

The Ethics Committee is responsible for administering and monitoring compliance with this Code, as well as recommending sanctions and/or actions to be taken that impact on ethical issues. Among its main functions are:

- Promote an ethical culture within the Company.
- Establish, together with Corporate Talent, a training plan for the Company's employees on ethical culture.
- Review guidelines and policies to ensure compliance with this Code.
- Recommend sanctions and actions in cases related to breaches of this Code.
- Assess disputes and resolve conflicts that impact on ethical issues.
- Ensure that all reports of deviations, misconduct or non-compliance with the rules and regulations in force are received and addressed.

The Ethics Committee will be made up by: (i) Compliance Officer, (ii) a representative of the Legal department, (iii) a representative of the regulatory department, (iv) the Controller and (v) the General Counsel.

If a member of the Ethics Committee fails to comply with any provision of this Code, he or she will be removed as a member of the Ethics Committee, and his or her employment may be terminated unilaterally with just cause.

NOTE: The above applies to the entire Company except for ILANS S.A.S when dealing with an ethical issue involving a patient and his/her personal health information (medical history). In this case, the Ethics Committee shall adapt to the requirements of local regulation and professional governing bodies (e.g. medical associations).

## **REGULATORY AND ADMINISTRATIVE COMPLIANCE**


The Company and its employees must abide by the laws, rules and regulations in their respective jurisdictions.

Every employee is responsible for exercising control over his or her own functions. In the case of management positions, they must monitor compliance with current regulations, as well as with the Company's internal regulations by the personnel under their charge, which is in accordance with the winning aspiration and vision of the Company.

## **NON-COMPLIANCE WITH CODE**

Violations of this Code constitute serious misconduct and a breach of the corresponding employment or service agreement and will be subject to disciplinary or other sanctions, including,

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as appropriate, warning, dismissal, or termination for breach of contract, and filing of civil actions or criminal complaints.

#### **EFFECTIVE DATE**

The provisions contained in this Code are mandatory, take immediate effect and come into force on February 8, 2021.

This policy must be reviewed and approved by the Company's Board of Directors on an annual basis, and it is the responsibility of the Corporate Talent area to maintain and disclose this policy and any revisions.

#### **CONTROL OF CHANGES**

<b>SUMMARY OF THE MODIFICATIONS</b>	
Drafted document	Version 00 01/10/2018
Review & approval by board of directors, come into force.	Version 01 08/02/2021
Review & modification of The Ethics Committee	Version 02 04/11/2021
<b>DETAIL OF ELIMINATIONS</b>	
N/A.	