



Code of Conduct

1. Application

This code of conduct applies to OPKO Health Inc. and its subsidiaries and affiliates and their Directors, full-time and part-time employees, contractors and temporary workers.

2. Your Obligation

You must understand and always comply with any and all laws, rules, regulations and ethical codes that apply to your job function. OPKO's Code of Conduct, policies, procedures, and trainings encapsulate applicable laws, rules, regulations, and ethical codes that pertain to your job – you must understand and always comply with them. Contact your Compliance or Legal department if you are unsure or have questions.

3. Make Good Decisions

When making decisions you must ensure you can truthfully say “yes” to each of these questions:

- ✓ Is my decision and resulting action legal?
- ✓ Does it comply with OPKO's Code of Conduct?
- ✓ Is it permitted by our policies and procedures?
- ✓ Could it have negative consequences for OPKO or myself?
- ✓ Would I be comfortable if it was reported in a newspaper?

4. Speak Up

OPKO has an open door and anti-retaliation work environment, which means all Code violations must never be ignored and a person reporting such information in good faith must be protected from any form of retaliation. If you suspect a violation of law, OPKO's Code of Conduct, or OPKO's Policies or Procedures, you have a duty to report this suspected violation to your supervisor. If you do not feel comfortable reporting a suspected violation to your supervisor you must report it to Human Resources, Corporate Compliance or Legal. See section 17 for the Corporate Compliance departmental email, or how to anonymously report a violation.

5. Create and Maintain a Healthy Work Place

Individual dignity and autonomy must be respected and safeguarded. Harassment, intimidation, bullying and/or discrimination is not tolerated. Employment decisions affecting individuals must be predicated on individual performance and ability - not factors like race, color, gender, religion, politics, age, national origin, disability, marital status, pregnancy, veteran status, sexual orientation or other factors irrelevant to individual capability.

Everyone owns workplace safety and must observe safe work practices by understanding and obeying posted warnings, signs, policies, procedures and trainings. Immediately report workplace injuries, activities or conditions that could pose a threat to OPKO employees, individuals working on behalf of OPKO, and anyone visiting OPKO workplace facilities. OPKO prohibits the use of illegal drugs, misuse of alcohol and other legal substances, and weapons at its workplaces.

Unsure of what to do? Primary contact is your Human Resources, Legal or Compliance Departments.

6. Never Bribe or Engage in Corrupt Acts

Bribery means the act of offering something in order to obtain an undue interest or advantage. OPKO personnel and anyone acting on OPKO's behalf may not offer, give, request, accept or receive a bribe. OPKO strictly prohibits any form of bribery and corruption as it distorts fair trade, hinders economic development, may be illegal and imposes multiple costs on society.

Unsure of what to do? Primary contact is your Compliance or Legal Departments.

7. Communicate Responsibly

Product and service communications must be truthful, accurate, complete, fair and balanced, and based on scientific rigor. The promotion of our products and services through our interactions with healthcare professionals must be consistent with the indications and conditions of use described in prescribing/referral information approved by relevant government authorities. We cannot engage in false or misleading advertising or unfair comments about competitors' products and services. All promotional product and service materials (all forms) must be reviewed and approved via internal processes defined in company policies and procedures.

Service or product reimbursement claims must be predicated on actual patient use and determined medically necessary by the treating healthcare professional. All service or product claims must be reviewed and approved via internal processes defined in company policies and procedures.

Do not communicate to the public, regulatory or government authorities, or investors on OPKO business information such as its products, services, research, or finances unless you are explicitly designated for this role by the head of your Legal or Compliance Department.

Unsure of what to do? Primary contact is your Compliance or Legal Departments.

8. Ensure Quality

OPKO puts the health and safety of patients first in everything it does. Everyone at OPKO is accountable for the Quality of OPKO research, products and services. Quality in the context of the life science industry means to establish and follow practices that ensure research, products and service related activities are safe, produce the highest level of data integrity, and meet intended use when products and services are provisioned to patients. You must always follow policies and procedures governing research, development, manufacturing, distribution, and laboratory diagnostic activities when performing a job function that could impact Quality. You must work with your supervisor to understand all Quality, legal, compliance, regulatory and industry standard requirements pertaining to your job. Do not

modify your work if you think there is a problem with following a governing policy and/or procedure. Raise your concern via the Speak Up process above to initiate a potential policy or procedure change assessment, or if you identify a quality issue with any product or service, especially if a patient could be or has been adversely impacted.

Unsure what to do? Your primary contact is your Quality, Compliance, or Legal Departments.

9. Properly Use and Protect Company Assets and Confidential Information

OPKO personnel and people working on OPKO's behalf must prevent or not facilitate unauthorized use, theft, damage, misappropriation or misuse of OPKO or third-party assets and confidential information.

- ❖ Physical assets such as supplies, equipment and vehicles may never be used for personal financial gain. OPKO assets may never be used to access or send offensive, threatening, abusive or obscene material.
- ❖ Confidential information must never be collected and used beyond what is authorized and needed for a particular defined business purpose and only on company provided assets or assets of third-parties contractually working on OPKO's behalf. Only disclose confidential information to people authorized to access the information as part of their job responsibility. Confidential information includes:
 - ✓ personally identifiable and protected health information of patients, healthcare professionals and employees.
 - ✓ intellectual property (e.g. patents, trade secrets, copyrights, trademarks).
 - ✓ product or service architectures, source codes, product or service plans and processes, and financial information.
 - ✓ third-party information protected under contractual agreements.
- ❖ You must immediately contact your Compliance or Legal departments if you identify unauthorized access of confidential information.
- ❖ Your Legal department may periodically send notices to not alter or discard specific information related to an investigation – you must make sure such notices are accurately and completely followed.

Unsure of what to do? Primary contact is your Compliance or Legal Departments.

10. Avoid Conflicts of Interest

OPKO personnel must not put themselves in situations where their own financial or personnel interest conflicts with their ability to act in the best interest of OPKO.

Unsure of what to do? Primary contact is your Compliance or Legal Departments.

11. Insider Trading

You may not buy or sell OPKO securities (for example stocks, bonds or options) when you are aware of material, non-public information relating to OPKO that an investor might

consider important in deciding whether to buy, sell or hold securities (e.g. insider information) unless explicitly approved by your Legal department.

Unsure of what to do? Primary contact is your [Legal Department](#).

12. Accurate Financial and Business Records

All OPKO books, records and accounts must accurately and honestly reflect the Company's business transactions. These records include financial statements, as well as time sheets, vouchers, bills, invoices, expense reports, payroll and benefits records and performance evaluations. Never misreport or misrepresent data, information, or purposefully fail to record or disclose funds, assets or liabilities.

Unsure of what to do? Primary contact is your [Compliance or Legal Departments](#).

13. Political Activities

Lobbying

You cannot provide anything of value to government officials or their staff without express written approval by your Legal or Compliance Departments.

Political Contributions

You cannot make political contributions using OPKO's name, resources or time - such contributions must be entirely separate from your work and affiliation with OPKO unless expressly approved by your Legal or Compliance Departments.

14. Trade Control Laws

OPKO Legal must be contacted before the import, export or transfer of technologies or performance of services, or making investments, transactions, or perming research and business activities in markets outside the U.S. Such laws related to these activities often change as the U.S. government adjusts to new political and security circumstances.

15. Fair Competition

OPKO competes based on the merits and quality of its products, services, and operational excellence. Do not participate in any plan, discussion, understanding or agreement with a competitor or supplier that could appear to interfere with free competition, including discussions on pricing or allocating markets or territories. Never acquire information about competitors through improper means such as theft, deception or misrepresentation.

Unsure of what to do? Primary contact is your [Compliance or Legal Departments](#).

16. Government Investigations

OPKO cooperates with all government authorities in connection with requests for information, inspections, physical searches and raids. If you are contacted by any government authority with regard to a non-routine request for information you must immediately contact OPKO Legal.

17. Reporting of Code Violations

A good faith belief of an suspected or known violation(s) to this code can be emailed to compliance@opko.com, or through the OPKO Alert Line, which allows for confidential and anonymous reporting:

- U.S. & Canada: 1-888-227-5556
- Chile: 12300206756
- Mexico: 0018005146065
- Spain: 900808307
- Israel: 1809450141
- Ireland: 1800-552-739

Failure to report a violation or suspected violation of this code can result in disciplinary action by OPKO, including termination of employment and business relationships.

Upon receipt of a report of a suspected violation, OPKO Compliance will launch a prompt and thorough investigation. OPKO expects employees to fully cooperate with any such investigation and it prohibits retaliation against any employee who makes a good faith report of a suspected violation of law or OPKO policy.

18. Code of Conduct Certification

CODE OF CONDUCT CERTIFICATION

I acknowledge that:

- 1) I have been provided with a copy of OPKO Health, Inc.'s Code of Conduct which I have read, understood and will comply with at all times.
- 2) I fully understand that, as an employee of OPKO Health, Inc. or any of its subsidiaries and affiliates, I have an obligation to fully adhere to OPKO Health, Inc.'s Code of Conduct and Business Ethics and to its policies and principles.
- 3) As of the date hereof I am not aware of any violation of OPKO Health, Inc.'s Code of Conduct and Business Ethics or any other company policy.
- 4) When I have a concern about a possible violation of company policy, I will report the concern to my manager, the local Compliance Officer, Compliance Responsible Person or the Chief Compliance Officer.

Employee/Contractor Signature
(or electronic signature through system)