



COLLEGIUM LOBBYING & POLITICAL EXPENSES STATEMENT

At Collegium, we are driven to make a positive difference in the lives of people living with serious medical conditions. The environment for research, development, and commercialization of our products can be significantly impacted by governmental policies implemented at the national, state, and local levels, and good communications and relationships with government agencies and elected and appointed governmental officials are important to Collegium. All Collegium interactions and relations with government officials must be conducted with honesty and integrity and in compliance with the letter and intent of all applicable laws and regulations.

PUBLIC POLICY PARTICIPATION

From time to time, Collegium may participate in federal and state public policy discussions to advocate the judicious and appropriate use of opioid therapy. We invest in leading with the science to expand the body of knowledge regarding the differentiation of our products and their impact in real-world settings and disseminate this information to healthcare providers, payers, and policy makers to educate on Collegium, our portfolio, and our mission to make a positive difference in the lives of people living with serious medical conditions.

We work with industry, provider, and patient groups, government relations professionals, trade associations and others to educate policymakers about our mission and to engage in constructive public policy dialogue that recognizes the needs of patients, their providers, and the communities we serve.

LOBBYING AND POLITICAL CONTRIBUTIONS

Lobbying

Collegium is committed to complying fully with all applicable state and local laws and regulations relating to interactions between Collegium employees and contractors and government officials. Such interactions are also subject to Collegium policy, including our Code of Ethics, Vendor Code of Conduct, and Anti-Bribery/Anti-Corruption policy and any other internal policies specific to political engagement and lobbying.

When engaging in lobbying activities, Collegium files public quarterly reports in accordance with the Lobby Disclosure Act detailing its federal lobbying activity. These reports are publicly available and located on the U.S. Senate Lobbying Disclosure [website](#) or the U.S. House of Representatives Office of the Clerk [website](#). Information about Collegium’s lobbying activity in a specific state is generally available on the website of the state agency overseeing lobbying compliance in that state.

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Outside of the United States, laws and regulations governing interactions with policy makers vary by country. Collegium is committed to complying with all applicable laws and regulations in countries where relevant interactions with policy makers occur.

Political Contributions

US law prohibits companies from making contributions to or expenditures for candidates running for federal office except through corporate-sponsored political action committees (PACs). State laws are diverse and complex; political contributions by companies are allowed, limited or prohibited depending on the state.

Because of the complexity of state and federal laws governing corporate political activities, only the Collegium Finance department may authorize the Company's financial contributions to any candidates, committees, political organizations and ballot issue campaigns.

Employees may never use Collegium time, property, or equipment for their own political activity.

IMPLEMENTATION

Compliance Department

Collegium's Compliance Department will implement a general employee training including:

- Periodic distribution of this Statement and its accompanying or applicable principles.

Department Management

Management of each Department or other organizational unit must:

- Ensure that this Statement is embedded in their business activities and adhered to.
- Train, oversee and supervise employees in accordance with the principles articulated in this Statement, as applicable.

REFERENCES

For further guidance or additional information see:

- Collegium's Code of Ethics
- Vendor Code of Conduct

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- Anti-bribery/Anti-corruption Policy

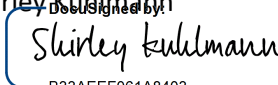
HISTORY

- Version 1.0 – December 1, 2023

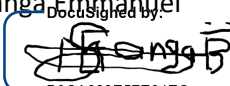
DEPARTMENT RESPONSIBILITIES:

OWNING, APPROVING AND STAKEHOLDER DEPARTMENTS:

Department: Legal

- Name: Shirley Kuhlmann
- Signature: 
B33AEEF061A8403...
- Title: Chief Administrative Officer, General Counsel
- Date: 1/24/2024

Department: Compliance

- Name: Sanga Emmanuel
- Signature: 
B0CA689E57E64EC...
- Title: Chief Compliance Officer
- Date: 1/24/2024

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