Supernus®

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A Letter from our CEO

At Supernus, our mission is rooted in improving the lives of patients suffering from diseases of central nervous system disorders. Achieving that mission requires more than innovation, scientific excellence, and strong execution. It requires trust. Every day, patients, healthcare professionals, business partners, investors, and our Teammates place their trust in us. We must continue to earn that trust through our actions.

Our Code of Conduct serves as a guide for how we do business and how we work together. It reflects our commitment to our values, ethical decision-making, compliance with the law, and respect for one another. While the Code cannot address every situation, it provides the principles that should guide our judgment when difficult decisions arise. We are expected to act honestly, speak up when something does not seem right, and seek guidance whenever we are uncertain.

The strength of our company is built on the character of our people. We each have a responsibility to uphold our values, maintain our reputation, and fulfill our mission. Making decisions and building a company that is consistent with our Code, our values, and applicable laws is not solely the responsibility of our leaders. It is incumbent upon all of us.

As we continue to grow and pursue new opportunities, our commitment to our values must remain constant. By holding ourselves to the highest standards of conduct, we earn trust, better serve patients, strengthen our culture, and create lasting value for all our stakeholders. Thank you for bringing our values to life every day and for making integrity a defining part of who we are.



Jack A. Khattar
President and Chief Executive Officer

Our Code of Conduct

Supernus is committed to conducting business with our Values and demonstrating accountability and respect. Compliance with the law is the starting point, not the finish line. We earn trust by making ethical decisions and acting responsibly every day.

What is the purpose of the Code of Conduct?
The purpose of this Code of Conduct (the "Code") is to set out the operating standards of Supernus, Inc. and its subsidiaries (together, "Supernus"), our Board of Directors (the "Board") and Supernus full- and part-time employees and contingent workers ("Teammates").

Supernus is committed to conducting business in alignment with our Values and in compliance with applicable laws, regulations, and industry standards, including the PhRMA Code and Innovative Medicines Canada Code of Ethical Practices. This Code provides the principles and expectations that help us make ethical decisions, act responsibly, and earn trust every day.

This Code promotes:

- Our Values
- honest and ethical conduct;
- transparency and accuracy in our communications and disclosures;
- compliance with applicable laws, regulations, industry codes, and company policies;
- speaking up when concerns arise; and
- accountability for our actions and decisions.

To whom does the Code apply?
The Code applies to the Board and Supernus Teammates. Others may be contractually obligated to comply with the Code (e.g., student interns and consultants). For our Teammates, the Supernus Employee Handbook contains aligned and complimentary requirements. The Third-Party Code of Conduct applies to external business partners.

Compliance with Legal and Regulatory Requirements

Supernus conducts business in multiple countries and interacts with patients, healthcare professionals, business partners, and government employees around the world. As a result, our operations are subject to a variety of national, regional, and international laws, regulations, and industry codes. Some requirements extend beyond national borders and may apply regardless of where we conduct business. It is important to understand how these requirements affect our work and to seek guidance whenever questions arise.

Anti-bribery and anti-corruption laws are an example of these global requirements. Supernus is committed to conducting business ethically and prohibits bribery, improper payments, kickbacks, facilitation payments, and other forms of corruption. Our Anti-Bribery and Anti-Corruption policies and procedures help ensure compliance with applicable laws, including those that govern interactions with healthcare professionals, government employees, customers, and third parties. Any Board member or Teammate who becomes aware of conduct that may violate anti-corruption laws or company requirements must promptly report the concern to Integrity & Compliance, Legal, or through available reporting channels.

In addition to this Code, Board members and Teammates are expected to comply with all applicable Supernus policies, procedures, and other governing documents. When requirements differ, the stricter standard applies. This may include applicable laws, regulations, industry codes (such as the PhRMA Code and Innovative Medicines Canada Code of Ethical Practices), and company policies. If you are unsure how to resolve a conflict between requirements, seek guidance from Integrity & Compliance or Legal.

This Code cannot address every situation you may encounter. Instead, it provides a framework for making sound decisions and acting with integrity, accountability, and respect. When faced with uncertainty, ask questions, seek guidance, and speak up.

Our Responsibilities

Teammates Responsibilities

We expect and rely on our Board and Teammates members to uphold and enforce this Code, our Values, and our related Compliance Standards. If you observe or believe there is a violation of the Code, our Compliance Standards, local, national, and multinational laws and regulations, or an activity that could lead to a violation, it is your responsibility and a requirement to "Speak Up."

Supernus's Speak Up program provides a number of different channels for you to raise questions or concerns, with Integrity & Compliance, Legal, your people leader, a member of senior management, or EthicsLine, a telephone and web-based reporting resource available 24 hours a day, seven (7) days a week. Both the current Supernus and Navex hotlines will remain available for a period of time, we will be transitioning fully to EthicsLine. EthicsLine is hosted by NAVEX, a third-party vendor and offers the option to raise concerns anonymously.

A "concern" is defined by the person expressing it. With regard to our Code, it most often refers to a suspected or potential violation of the Code, any law, regulation, or Compliance Standard applicable to Supernus's business and operations.

Supernus will not retaliate against any individual who reports a concern in good faith or participates in Supernus's investigation of such a concern. Any Teammate found to have retaliated against anyone for reporting in good faith or participating in an investigation will be disciplined according to our Compliance Standards. All Teammates have a responsibility to fully cooperate in an investigation.

People Leaders have an important responsibility to set an example and consistently act in accordance with, and coach others in line with, our code and compliance policies, procedures, and guidance ("Compliance Standards"). Leaders must also take steps to help integrate our Compliance Standards throughout Supernus to learn, adjust, and prevent compliance issues in a timely and ongoing manner.

Waivers and Amendments

We recognize that exceptional circumstances may require a waiver of a provision of this Code. Anyone seeking a waiver may raise the request with their people leader or directly with the Chief Integrity & Compliance Officer. Waivers for individuals other than members of our Board or our executive officers may only be approved by the Chief Integrity & Compliance Officer and will be disclosed when required. Waivers for any members of our Board or our executive officers may only be approved by the Board and will be disclosed as required.

The Code may be updated from time to time to reflect changes in our business, legal or regulatory requirements, or our expectations. Material changes will be communicated promptly to our Board and Teammates.

Our Standards

Healthcare Professionals and Patients

We work responsibly and ethically to improve the lives of patients

Supernus does not seek to influence healthcare decisions through improper benefits or incentives. Healthcare professionals should make decisions based on what is best for patients, supported by appropriate clinical information and independent professional judgment. Our interactions with healthcare professionals, healthcare organizations, patients, and patient advocacy organizations must comply with applicable laws, industry codes, and Supernus Compliance Standards. We are each responsible for ensuring these interactions are ethical, appropriate, and transparent.

Research and Development

Scientific decisions should be driven by evidence, integrity, and patient benefit.

Supernus is committed to conducting research that produces reliable, objective data and advances scientific understanding. We follow applicable laws, regulations, and recognized research standards, including requirements related to informed consent, participant protections, data integrity, and the ethical treatment of animals. We are each responsible for helping ensure our research is conducted ethically, responsibly, and with respect for those who place their trust in us.

Patient Safety

Patient safety should guide our actions throughout the product lifecycle.

Supernus is committed to monitoring, evaluating, and communicating the safety of our products so that patients, healthcare professionals, and regulators have the information needed to make informed decisions. We promptly collect, assess, and report safety information in accordance with applicable laws, regulations, and Supernus requirements.

We each share responsibility for identifying and escalating potential safety concerns. By maintaining effective pharmacovigilance processes and supporting required risk management activities, we help protect patients and strengthen confidence in our products.

We also work with regulatory authorities and other stakeholders to help protect the integrity of the pharmaceutical supply chain and reduce the risk of counterfeit medicines reaching patients.

Compliance with Our Policies

Anti-Bribery and Anti-Corruption (ABAC) and Anti-Fraud

We earn business through integrity, never through bribery, corruption, or fraud.

Supernus is committed to conducting business ethically and fairly in every country where we operate. We do not offer, promise, authorize, request, or accept bribes, kickbacks, improper payments, or anything of value intended to influence a decision or obtain an unfair advantage. We also prohibit the misuse of entrusted authority or position for personal, business, or financial gain. Facilitation or "grease" payments are prohibited regardless of local custom or business practice.

Fraud is any intentional act of deception designed to obtain an improper benefit, avoid an obligation, misrepresent facts, or cause harm to others. Fraud can take many forms, including falsifying records, misrepresenting information, submitting inaccurate expense reports, creating misleading financial or business records, concealing material information, or improperly using company assets.

These risks can arise through direct or indirect actions and may involve healthcare professionals, government employees, customers, suppliers, business partners, or fellow Teammates. Even the appearance of bribery, corruption, or fraudulent conduct can damage trust and our reputation.

We each have a responsibility to act honestly, maintain accurate records, exercise good judgment, and promptly raise concerns when we become aware of suspected misconduct. If you have questions or concerns regarding potential bribery, corruption, or fraud, seek guidance from your people leader, Integrity & Compliance, Legal, or use available reporting channels.

Conflicts of Interest

Business decisions are made in the best interests of Supernus and the patients we serve.

A conflict of interest arises when personal, financial, family, or other outside interests interfere, or appear to interfere, with the ability to make objective business decisions. Even the appearance of a conflict can undermine trust and create risk for both the individual and Supernus.

Conflicts may arise in many situations, including outside employment, financial investments, personal relationships, service on external boards or organizations, or opportunities to benefit personally from a business decision. A conflict can also occur when a family member or close personal relationship influences, or appears to influence, business judgment. Conflicts of interest are not always prohibited, but they must be promptly disclosed and appropriately managed. We each have a responsibility to identify potential conflicts, seek guidance when questions arise, and disclose situations that could affect, or appear to affect, our objectivity.

If you become aware of an actual, potential, or perceived conflict of interest involving yourself or another Teammate, review the Conflict of Interest Policy and promptly inform your leader and submit the required information to Integrity & Compliance.

Gifts and Entertainment

Our business relationships are based on trust, professionalism, and the value we provide.

Supernus does not permit personal gifts to healthcare professionals. For all other interactions, gifts, meals, entertainment, hospitality, or other items of value may only be provided or accepted when permitted by applicable laws, regulations, industry codes, and Supernus requirements.

Not all transfers of value are inappropriate. Certain items, such as pre-approved medical or scientific reprints, educational materials, or other company-authorized resources, may be provided when they support a legitimate business, scientific, educational, or patient-focused purpose. These items are pre-approved through dedicated Supernus approval pathways (e.g., Promotional Review Committee).

Items of value must never be offered, provided, requested, or accepted if they could improperly influence, or appear to influence, a business decision. Even modest gifts or hospitality can create the appearance of a conflict of interest or improper influence if not handled appropriately.

Before providing or accepting gifts, meals, entertainment, or hospitality related to Supernus business, obtain any required approvals and consult applicable Supernus Compliance Standards.

Country-specific Supernus Compliance Standards may impose additional restrictions, approval requirements, spending limits, or reporting obligations. We are each responsible for understanding and following the requirements that apply to our role and location.

Working with the Government

We engage the government honestly, transparently, and with respect for the public interest.

Supernus regularly interacts with government agencies, regulators, public officials, public healthcare systems, and public international organizations. These relationships play an important role in advancing healthcare, supporting patients, and helping ensure compliance with applicable laws and regulations.

Government interactions often involve heightened legal, ethical, and transparency requirements. When engaging with government entities or employees, we are expected to act professionally, provide accurate and complete information, maintain appropriate records, and comply with all applicable external and Supernus requirements.

In some countries, individuals who are not traditional government employees may nevertheless be considered Government Officials under the U.S. Foreign Corrupt Practices Act (FCPA) or local law. We comply with the FCPA and all applicable anti-corruption laws wherever we conduct business.

We cooperate with government authorities while appropriately protecting Supernus's legal rights, confidential information, and legitimate business interests. We also recognize that certain communications, activities, and transfers of value involving government may trigger registration, approval, disclosure, or reporting obligations. We hold ourselves accountable for meeting all applicable external requirements.

Each of us has a responsibility to seek guidance whenever we are uncertain about how to interact with government entities or employees. By conducting these interactions with integrity and transparency, we help maintain trust, support effective public institutions, and protect the reputation of Supernus.

Tax Evasion

We conduct our business honestly and do not tolerate tax evasion or the facilitation of tax evasion.

Tax evasion is the illegal non-payment or underpayment of taxes. Facilitating tax evasion occurs when a person knowingly assists, encourages, or enables another party to evade taxes. Both tax evasion and the facilitation of tax evasion are unethical and may expose individuals and companies to significant civil or criminal penalties.

Supernus is committed to complying with applicable tax laws and maintaining accurate and transparent business records. We do not tolerate tax fraud, tax evasion, or conduct intended to help another person or organization evade their tax obligations.

This expectation applies to our interactions with customers, suppliers, business partners, contractors, and fellow Teammates. We will not knowingly participate in, support, or facilitate arrangements designed to conceal income, misrepresent transactions, create inaccurate records, or otherwise circumvent applicable tax laws.

Many countries have enacted laws that impose liability on organizations and individuals who facilitate or fail to prevent tax evasion. We are each responsible for conducting business honestly, maintaining accurate records, and raising concerns if we suspect improper conduct.

If you become aware of suspected tax fraud, tax evasion, or the facilitation of tax evasion, promptly seek guidance from your leader, Finance, Legal, or Integrity & Compliance, or report the concern through the Supernus EthicsLine.

Use of Information Technology (IT) and Artificial Intelligence (AI)

We use technology, data, and AI responsibly, securely, and in ways that build trust.

Technology and data are critical to our ability to serve patients, advance science, operate effectively, and meet our business objectives. We are committed to protecting Supernus information, systems, intellectual property, and data from unauthorized access, loss, misuse, disclosure, or cyber threats.

Artificial intelligence (AI) and other emerging technologies can help improve productivity, decision-making, innovation, and business processes. However, these tools must be used responsibly and in accordance with applicable laws, regulations, company requirements, and ethical standards. AI should support human judgment, not replace individual accountability for decisions and actions.

When using information systems or AI-enabled tools, we are expected to:

- protect confidential, personal, and sensitive information;
- use only approved technologies and data sources for business purposes;
- verify the accuracy, completeness, and appropriateness of AI-generated content before relying upon or sharing it;
- respect intellectual property, privacy, security, and data governance requirements; and
- promptly report suspected cybersecurity incidents, data breaches, or misuse of company systems.

Each of us plays an important role in safeguarding the information and technologies entrusted to us. Responsible use of IT and AI helps protect patients, supports compliance with our obligations, and maintains the trust of our stakeholders.

Marketing and Promotion of Supernus Products

We are committed to promoting our products truthfully, responsibly, and in the best interests of patients.

Healthcare professionals and patients rely on accurate information to make informed treatment decisions. We are committed to ensuring that our promotional and educational communications are truthful, balanced, supported by appropriate scientific evidence, and consistent with approved labeling and applicable requirements.

Only company-approved materials may be used to promote Supernus products. Product claims, disease-state information, and other promotional communications must undergo the Promotional Review Committee (PRC) process before use. We do not promote products for unapproved uses or make statements that are false, misleading, or inadequately supported by evidence.

We are each responsible for ensuring that our communications reflect the integrity of our science, our products, and Supernus. By providing accurate and reliable information, we help healthcare professionals make informed decisions and maintain trust with patients, regulators, and other stakeholders.

Privacy and Personal Information

The information entrusted to us deserves the same care and respect that we expect for our own information.

Supernus is committed to protecting the privacy, confidentiality, and security of personally identifiable information (PII). We collect, use, share, and retain PII only for legitimate business purposes and in accordance with applicable laws, regulations, and Supernus requirements.

Whether information relates to patients, healthcare professionals, clinical trial participants, Teammates, or business partners, we must safeguard it from unauthorized access, use, disclosure, or loss. Access to PII should be limited to those with a legitimate business need and appropriate authorization.

Protecting personal information is essential to maintaining trust. We are each responsible for handling information carefully, protecting confidentiality, and promptly reporting suspected privacy or security incidents.

External Communications and Reporting

We communicate accurately, transparently, and in a manner that promotes trust and confidence in Supernus.

Investors, patients, healthcare professionals, regulators, business partners, employees, and the public rely on the information we provide. We are committed to ensuring that our external communications and public disclosures are accurate, complete, timely, and consistent with applicable laws, regulations, and Supernus requirements.

Only authorized individuals may speak on behalf of Supernus or provide information to investors, securities analysts, members of the media, or other external stakeholders. When communicating externally, we must ensure that information is truthful, appropriately reviewed, and not misleading.

As a public company, we are committed to the fair and appropriate disclosure of material information. We seek to provide stakeholders with information that helps them understand our business, strategy, performance, risks, and opportunities, while protecting confidential, proprietary, and non-public information.

Each of us has a responsibility to protect the integrity of Supernus's communications and reputation. If you receive an inquiry from the media, investors, analysts, or other external parties seeking company information, refer the request to Corporate Communications.

Confidential Information and Intellectual Property

We protect confidential information and intellectual property entrusted to us.

Protecting them is essential to maintaining trust, advancing innovation, preserving our competitive advantage, and supporting our ability to serve patients.

Board members and Teammates are required to safeguard confidential information entrusted to them by Supernus, as well as information received from patients, healthcare professionals, customers, suppliers, business partners, and other third parties. Confidential information may include scientific data, clinical research, business strategies, financial information, product plans, commercial insights, personal information, trade secrets, and other non-public information.

Confidential information may only be accessed, used, shared, or disclosed for legitimate business purposes and by individuals with appropriate authorization and a need to know. We must take appropriate precautions to protect information from unauthorized access, disclosure, loss, theft, or misuse, both during and after our relationship with Supernus.

We also respect and protect intellectual property rights, including patents, trademarks, copyrights, trade secrets, proprietary technologies, inventions, know-how, and scientific discoveries. We are expected to protect Supernus's intellectual property and respect the intellectual property rights of others. Unauthorized use, disclosure, copying, or distribution of protected information or intellectual property may harm patients, business partners, and Supernus.

Each of us plays an important role in protecting the information, innovations, and ideas that support our mission and future success.

Business Intelligence Gathering

We compete vigorously, fairly, and ethically.

Understanding the marketplace, customer needs, industry trends, and competitor activities helps us make informed business decisions and better serve patients. We may gather and use information about other companies, products, services, and markets, provided the information is obtained lawfully, ethically, and in a manner consistent with our values.

Business intelligence may be obtained from legitimate sources such as publicly available information, industry publications, scientific conferences, public presentations, market research, and appropriate interactions with customers, suppliers, healthcare professionals, and other industry participants.

We must never seek to obtain confidential, proprietary, or non-public information through deception, misrepresentation, theft, unauthorized access, breaches of confidentiality obligations, or other improper means. Likewise, we must not ask third parties to engage in conduct that would be inappropriate or unlawful if conducted by Supernus directly. When third parties conduct business intelligence activities on behalf of Supernus, we remain responsible for ensuring those activities are performed lawfully, ethically, and in accordance with Supernus Compliance Standards.

Fair competition depends on integrity and respect for the rights of others. If you believe information has been obtained, shared, or used improperly, promptly seek guidance from Legal, Integrity & Compliance, or report the concern to EthicsLine.

Dealing in Supernus Securities and Inside Information

We do not use or share inside information for personal gain.

In the course of our work, we may become aware of material non-public information about Supernus or other companies. Material non-public information is information that has not been publicly disclosed and that a reasonable investor would consider important when deciding whether to buy, sell, or hold securities.

When in possession of material non-public information, we must not buy, sell, or otherwise trade in Supernus securities or the securities of another company. We also must not share such information with others, including family members, friends, or business associates, who could use it to make investment decisions.

Protecting inside information is essential to maintaining investor confidence, complying with securities laws, and preserving trust in the fairness and integrity of financial markets. This obligation applies regardless of whether a trade is made for personal benefit or on behalf of another person.

Advances in financial markets and technology have created new ways for individuals to profit from non-public information. We must not use material non-public information to participate in prediction markets, event-based contracts, sports-style wagering platforms, derivatives, or any other arrangement where the outcome or value could be influenced by confidential Supernus information. The same standards that apply to insider trading and tipping apply to these activities.

Certain Board members and Teammates may also be subject to additional requirements, including trading windows, blackout periods, pre-clearance obligations, or other restrictions established by Supernus. Additional responsibilities are confirmed in our Code of Ethics for Senior Financial Officers. We are each responsible for understanding and complying with the requirements applicable to our role.

If you have questions about whether information may be considered material non-public information or whether a transaction is permitted, seek guidance from Legal or Integrity & Compliance before taking action.

Environment, Health, and Safety

Environment and Climate Change

We operate safely, responsibly, and with respect for people, communities, and the environment.

The medicines we develop, manufacture, and deliver have the potential to improve lives. With that opportunity comes a responsibility to protect the health and safety of our Teammates, contractors, visitors, patients, communities, and the environment.

We are committed to maintaining safe and healthy workplaces, complying with applicable environmental, health, and safety requirements, and continuously improving our

performance. Every Teammate has a responsibility to follow established procedures, identify and report hazards, stop work when safety is at risk, and help foster a culture where safety is valued and expected.

Our manufacturing, laboratory, warehousing, and distribution operations require particular attention to safety, quality, and environmental stewardship. We are committed to operating our facilities responsibly, managing materials and waste appropriately, conserving resources where possible, and maintaining systems designed to protect people, products, and the environment.

Environmental responsibility is an important part of sustainable growth. Whether working in a research laboratory, manufacturing facility, office, field-based role, or from home, our daily decisions can contribute to reducing environmental impact and supporting the long-term health of the communities we serve.

Protecting people and the environment is not separate from our mission. It is an essential part of how we maintain trust, deliver quality medicines, and operate with integrity.

Respect for Each Other

Respectful Workplace

We foster a workplace where everyone is treated with respect, has the opportunity to contribute, and can perform at their best.

Supernus believes that innovation, sound decision-making, and business success are strengthened when people with different backgrounds, experiences, skills, and perspectives can contribute openly and respectfully. We are committed to maintaining a workplace where individuals are treated fairly, valued for their contributions, and provided equal opportunities to grow and succeed.

We expect all interactions to reflect professionalism, respect, and dignity. Discrimination, harassment, bullying, retaliation, or other conduct that undermines a respectful workplace is not tolerated. This includes abusive, intimidating, threatening, humiliating, or offensive behavior, whether it occurs in person, online, or through other forms of communication. Supernus complies with applicable employment and human rights laws wherever we operate. Employment-related decisions, including recruiting, hiring, development, promotion, compensation, and other employment actions, are made based on qualifications, performance, business needs, and other lawful considerations.

Creating an inclusive workplace is a shared responsibility. We are expected to listen respectfully, encourage constructive dialogue, recognize the value of differing viewpoints, and help ensure that everyone can contribute without fear of discrimination, harassment, or retaliation.

If you experience or witness inappropriate behavior, speak up. Concerns may be discussed with your leader or reported to Human Resources, Integrity & Compliance, Legal, senior management, or through the Supernus EthicsLine.

Communities

We seek to make a positive impact in the communities where we live, work, and serve patients.

Supernus recognizes that our responsibilities extend beyond our facilities, products, and business operations. The decisions we make can affect patients, caregivers, healthcare systems, employees, local communities, and society more broadly. We are committed to conducting business in a manner that supports public health, patient well-being, and community trust.

We engage openly and responsibly with healthcare professionals, regulators, legislators, patient communities, advocacy organizations, and other stakeholders to better understand the needs and challenges facing the people we serve. Through these interactions, we seek to contribute to informed healthcare decisions, improve health outcomes, and support the responsible use of our medicines.

As members of communities around the world, we are expected to act with integrity, respect, and consideration for the impact of our actions. We comply with applicable laws and company requirements designed to protect public health and safety, and we strive to be responsible corporate citizens wherever we operate.

Building trust within our communities is essential to our mission. By listening, engaging respectfully, and acting responsibly, we help strengthen the relationships that support our long-term success and our ability to improve patients' lives.

Human Rights

We respect the dignity, rights, and well-being of all people affected by our business.

Supernus is committed to conducting business in a manner that respects internationally recognized human rights and reflects our values. We believe that every person should be treated with dignity, fairness, and respect. We seek to uphold these principles and our values in our workplaces, our communities, and throughout our business relationships.

This commitment extends to our Teammates, patients, clinical trial participants, contractors, suppliers, and other stakeholders. We do not tolerate forced labor, human trafficking, child labor, unlawful discrimination, harassment, or other practices that are inconsistent with fundamental human rights. We also support safe working conditions, lawful employment practices, and the freedom of Teammates to raise concerns without fear of retaliation.

We recognize that respecting human rights is not limited to our own operations. We expect our suppliers, contractors, and business partners to operate responsibly and in a manner consistent with applicable laws and our standards.

Our approach is informed by internationally recognized principles, including the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and applicable laws designed to prevent human trafficking, forced labor, and modern slavery.

We each share responsibility for identifying and raising concerns regarding conduct that may be inconsistent with these principles and our values.

Business Stewardship

Political Activities and Contributions

We engage in the public policy process responsibly, transparently, and in compliance with applicable laws.

Public policy decisions can have a significant impact on patients, healthcare systems, scientific innovation, and access to medicines. Supernus may participate in the public policy process in ways that are consistent with our values, business objectives, and commitment to improving patient lives.

Political contributions, lobbying activities, and other forms of political engagement are subject to strict legal, regulatory, disclosure, and approval requirements. Any political contribution or expenditure made on behalf of Supernus must be properly authorized, accurately recorded, and comply with applicable laws and Supernus requirements.

Personal political activities are a matter of individual choice and should be undertaken in a personal capacity. Teammates may not use Supernus funds, resources, assets, or brand to support political candidates, parties, causes, or organizations unless specifically authorized by Supernus.

We are committed to ensuring that our interactions with policymakers, regulators, government employees, and other stakeholders are conducted ethically, transparently, and in a manner that maintains public trust.

Financial Integrity

We maintain accurate records and provide truthful, complete, and timely disclosures.

The integrity of our books and records, financial reporting, and public disclosures is fundamental to the trust placed in Supernus by patients, investors, regulators, business partners, and one another.

All business transactions must be accurately, completely, and transparently recorded in accordance with applicable laws, accounting standards, and Supernus requirements. We must never create false, misleading, incomplete, or artificial records, nor take actions that could conceal the true nature of a transaction or business activity.

Each of us is responsible for maintaining accurate records within our area of responsibility and for providing information that is complete, timely, and reliable. This responsibility extends beyond financial records and includes operational, scientific, regulatory, compliance, and other business records that support company decision-making and public disclosures.

We are expected to cooperate fully with internal and external auditors, accountants, investigators, and legal advisors and to support the effectiveness of Supernus's internal controls, disclosure controls, and reporting processes.

Certain employees may have additional responsibilities related to financial reporting, public disclosures, and financial oversight. These individuals are expected to understand and comply with applicable company requirements, including the Senior Financial Officers Code of Ethics.

Tax Compliance

We comply with applicable tax laws and support accurate and transparent tax reporting.

TTaxes help fund public services, infrastructure, and healthcare systems that support the communities where we operate. Supernus is committed to complying with applicable tax laws and regulations in the countries where we conduct business and maintain accurate records that support our tax reporting obligations.

The management of Supernus's tax affairs is the responsibility of designated Finance and Legal professionals. All communications with tax authorities, requests for information,

audits, inquiries, or other tax-related matters should be promptly referred to the appropriate Finance or Legal representatives.

We are each responsible for maintaining accurate books, records, and supporting documentation within our areas of responsibility. Inaccurate, misleading, incomplete, or improperly documented transactions can create tax, legal, financial, and reputational risks for Supernus.

By maintaining accurate records and supporting transparent tax compliance, we help protect the integrity of our business and uphold the trust of regulators, investors, patients, and other stakeholders.

Fair Competition and Trade Restrictions

We compete fairly and comply with applicable trade restrictions.

Supernus is committed to competing vigorously, ethically, and in compliance with applicable competition, antitrust, and trade laws. Fair competition benefits patients, healthcare systems, and society by encouraging innovation, improving quality, and supporting informed decision-making.

We do not engage in activities that improperly restrict competition or distort the marketplace. This includes agreements or understandings with competitors regarding prices, customers, territories, bids, production, market allocation, or other competitive matters. We also do not obtain, use, or disclose competitors' confidential or proprietary information through improper means.

Interactions with competitors, industry associations, customers, suppliers, and other business partners must always be conducted professionally, transparently, and in compliance with applicable competition laws. If you are uncertain whether a discussion or activity could raise competition concerns, seek guidance from Legal or Integrity & Compliance before proceeding.

We also comply with applicable trade sanctions, export controls, and other trade restrictions. These laws may prohibit or restrict dealings with certain countries, organizations, entities, or individuals. Supernus conducts screening and due diligence activities to help identify sanctioned parties and other restricted transactions.

We must not knowingly engage in business with sanctioned individuals or entities or participate in transactions that violate applicable trade restrictions. If you become aware that a customer, supplier, business partner, or other third party may be subject to sanctions or trade restrictions, promptly contact Legal or Integrity & Compliance.

By competing fairly and complying with trade restrictions, we protect patients, support lawful global commerce, and preserve the trust placed in Supernus.

Living the Code

This Code belongs to all of us.
Our Code of Conduct is more than a set of rules. It reflects who we are, how we make decisions, how we treat one another, and how we earn the trust of patients, healthcare professionals, regulators, investors, business partners, and the communities we serve.

Every Board member and Teammate is responsible for understanding, following, and promoting the principles outlined in this Code. We are each expected to exercise sound judgment, seek guidance when questions arise, and speak up when we believe conduct may be inconsistent with our values or requirements.

Leaders have an additional responsibility to set the tone, model ethical behavior, foster an environment where concerns can be raised without fear of retaliation, and help ensure that this Code is understood and applied in the areas they oversee.

Compliance with this Code helps protect patients, our colleagues, our reputation, and our ability to fulfill our mission. Failure to comply with this Code, Supernus Operating Standards, or applicable laws may result in disciplinary action, up to and including termination of employment. It may also expose individuals and Supernus to legal, financial, or reputational consequences.

To demonstrate our shared commitment, Board members and Teammates may be required to periodically confirm that they have read, understood, and will comply with this Code and applicable Supernus requirements.

Ultimately, our reputation is built one decision at a time. By acting with integrity, accountability, and respect, we strengthen the trust others place in Supernus and help ensure our long-term success.

The decisions we make, especially when no one is watching, define who we are as Supernus. By acting with our values, we honor the trust placed in us and help improve the lives of the patients we serve.