



AMRYT PHARMACEUTICALS

**GLOBAL
CODE OF
CONDUCT**

SEPTEMBER 2022

Version 2.0

A LETTER FROM THE CEO



A handwritten signature in blue ink, which appears to read "Joe Wiley". The signature is fluid and cursive.

Joe Wiley

Chief Executive Officer
Amryt PLC

The way in which Amryt achieves business success is every bit as important as what we achieve. I want to lead a business where every single employee feels proud of their achievements because they work hard and work in the right way.

Together we can create our company, our culture and our future. At Amryt, our focus is on acquiring, developing and commercializing medicines to treat patients with rare, orphan and debilitating diseases.

Our unwavering goal of improving the life of patients suffering from these devastating diseases should always be accomplished in the right way – with a constant focus on truthful communication, ethical competition, mutual respect and safety, and integrity in all that we do.

At Amryt we want to ensure that our activities are guided by our commitment to our core values, and that our actions are compliant with regulations that govern our industry. The foundations of these commitments are laid out in our Code of Business Conduct, and each employee must take personal responsibility for abiding by our Code.

Let's build a company and culture together that makes us proud of how we attain our future success.

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INTRODUCTION

This Code of Business Conduct (this “Code”) applies to all employees, officers and directors of Amryt Pharma Plc (“Amryt” or the “Company”). Amryt also expects its independent contractors, consultants and other third parties with whom it works to comply with all applicable laws and regulations, as well as with the principles set forth in this Code.

We operate on a foundation of responsibility, integrity and ethical practice. We aim to forge partnerships and collaborations that work for all. By listening to our stakeholders we create a clear path for our transformative medicines to reach those that need them.

This Code reflects Amryt’s commitment to acting with integrity and honesty in all that we do. It further demonstrates the high ethical and legal standards the Company has adopted. Its principles include the following:

- Compliance with applicable laws, rules and regulations;
- Honesty and integrity in all actions and statements;
- Treat all individuals, both in and outside of the Company, with respect and dignity;
- Full, accurate and understandable disclosures in reports and documents filed with regulatory agencies and in public communications;
- Thorough, prompt and fair review of all allegations of suspected violations of this Code or other Company standards and guidelines; and
- Accountability by all Company employees, including leadership at every level, for compliance with this Code.

We expect our leaders to set the tone for compliance with our Code and accountability for all employees. All directors, officers and employees will be supplied a copy of this Code and all must certify that they have received, read and understood the Code and will comply with its terms.

Amryt can amend, alter or terminate this Code at any time for any reason. The most current version of this Code can be obtained from the Human Resources, Compliance or Legal departments as well as Amryt’s website (www.amrytpharma.com). Employees, officers and directors will periodically receive revisions to the Code. We expect all of our business partners to be aware of and responsible for adherence to the principals set forth in this Code, as relevant to their respective activities with Amryt.

This Code is not an employment contract between the Company and any of its employees, officers or directors.

OUR RESPONSIBILITIES AND VALUES

All of us play an important role in ensuring compliance with this Code, other Company policies and the law. Acting consistently with these principles is a responsibility of all of us at Amryt. This Code is a reflection of Amryt's core values, which is at the center of how we operate and conduct business in the global community:

AMRYT'S VALUES



This Code is meant to provide you with guidelines concerning the Company's commitment to lawful, honest and ethical conduct in all that it does. Please note that the Company may have other guidelines or policies on some of the matters this Code discusses, some of which will be referenced throughout. This Code does not supersede those policies. Instead, employees must be familiar with all Company policies, rules and guidelines that apply to them.

OUR RESPONSIBILITIES AND VALUES

Employees, officers and directors must:

- Review, understand and comply with this Code and all other applicable Company policies;
- Ask questions about any matters related to this Code of which they are unsure;
- Act with honesty, integrity and ethical standard in conducting Company business;
- Treat our peers, customers, clients, vendors and others with respect and dignity;
- Raise any statements or behaviours that they think may violate this Code or other applicable policies through the channels described below;
- Cooperate with any inquiries or investigations pursued by the Company concerning possible violations of this Code or other rules, policies or guidelines; and
- Refrain from retaliating against anyone because they have raised a question or concern in good faith.

Q: Where can I find out what rules and guidelines apply to me?

A: Speak with your supervisor or reach out to Compliance, Legal or any representative of Human Resources. Ultimately, it is your responsibility to make sure your conduct conforms to applicable laws and rules. Make sure you get answers to your questions if you have any concerns.



OUR RESPONSIBILITIES AND VALUES

MANAGERS AND DIRECTORS HAVE AN IMPORTANT ROLE TO PLAY IN IMPLEMENTING OUR STANDARDS AND LEADING BY EXAMPLE.

Every manager, supervisor, or other Company leader has additional responsibilities. We must:

- Create a culture in which our colleagues feel comfortable raising concerns and asking questions without fear of retaliation;
- Model Amryt's commitment to this Code and other Company principles of ethical behaviour and honesty in all that we do and say;
- Ensure that our direct reports act consistently with this Code, Company policies and guidelines, and applicable law at all times; and
- Raise all suspected violations of the Code through appropriate reporting lines.

This Code is an important part of Amryt's culture.

Amryt expects its employees to adhere to this Code, and if employees fail to abide by the terms of this Code, there may be disciplinary action. Disciplinary action may include, but is not limited to, oral or written reprimands, warnings, probation or suspension, with or without pay, demotions, and termination of employment, without following any progressive disciplinary steps, in accordance with applicable law. It also reserves the right to refer any suspected violations of the law to appropriate authorities for investigation and possible prosecution.



REPORTING COMPLIANCE CONCERNS

The Company offers multiple reporting channels to ensure that employees can choose an option with which they are comfortable. Among these options is an ethics reporting portal that is available in all time zones globally, twenty-four (24) hours a day, seven (7) days a week at: <https://amrytpharma.ethicspoint.com>. The portal also includes local telephone numbers for reporting.

Other reporting options include the following:

Resource	Contact Information
Your Manager or Supervisor	Refer to the Company Directory
The Human Resources Department	Head of Human Resources HR and Payroll Managers
The Legal Department	General Counsel Vice President, Legal
The Corporate Compliance Department	Global Chief Compliance Officer Executive Director, US Compliance compliance.us@amrytpharma.com
Ethics Reporting Portal	https://amrytpharma.ethicspoint.com Please visit the above address of reporting telephone numbers

While we ask that you identify yourself when reporting suspected violations so that we may follow up with you as necessary, you may file reports anonymously if permitted by local law.

We ask that all of our employees report any concerns regarding possible violations of this Code or other applicable rules, guidelines or laws that are held in good faith. This may include concerns relating to employee workplace conduct, financial or accounting practices, manufacturing, applicable regulations and any other form of conduct that may be inconsistent with our standards of integrity and honesty. It is difficult for Amryt to address issues if employees do not speak up.

WHEN IN DOUBT, RAISE YOUR CONCERN VIA A REPORTING LINE OR BY ASKING A QUESTION USING THE OTHER PROCEDURES DESCRIBED IN THIS POLICY.

REPORTING COMPLIANCE CONCERNS

We review all complaints raised in good faith to determine whether an investigation is appropriate and what form it will take. If we find that certain conduct has violated the terms of this Code, we will take action, as appropriate under the circumstances.

An investigation may involve the Compliance, Human Resources and Legal Departments, as needed. The Company may also seek the assistance of an outside resource to investigate a complaint if it deems such action appropriate.

All employees, officers and directors are expected to cooperate fully in any Company investigation regarding an alleged violation of this Code or other applicable rules, policies or guidelines. Failure to do so may itself result in disciplinary action, up to and including termination of employment in accordance with local law.

Q: I think something might have happened that violates our Code of Conduct, can I report my concern confidentially?

A: Complaints can always be made anonymously via our online reporting channel. We review every complaint to ensure Amryt takes appropriate action. When reports are reviewed, we try to maintain confidentiality where possible, in light of the need to conduct a full and fair investigation, or as may be required by law. Additionally, we note that certain local laws may not allow us to keep a report anonymous.

During and after an investigation, as appropriate, we strive to maintain privilege and confidentiality as much as practicable, and therefore, we may not always share the results of an investigation with the reporting party. We also cannot guarantee complete anonymity, depending on the level and scope of the outcomes and requirements mandated by local law. Employees who are concerned about remaining anonymous may raise their concerns via the online reporting portal (<https://amrytpharma.ethicspoint.com>).

Nothing in this Code prohibits an employee from reporting any suspicion of violation of law to the appropriate governmental agency, or from participating in any governmental investigation or procedures.

REPORTING COMPLIANCE CONCERNS



Amryt does not tolerate retaliation against any individual who makes a report in good faith.

Amryt strictly prohibits retaliation against any person who, acting in good faith, reports suspected misconduct, regardless of whether the alleged misconduct is confirmed by subsequent investigation. Any person who participates in any such retaliation will be subject to disciplinary action, including possible termination in accordance with local law.

What is retaliation?

- Harassment (i.e. unwelcome and offensive comments or actions);
- Bullying;
- Denial of opportunities, promotions or benefits;
- Demotion;
- Threats of any kind;
- Suspension;
- Termination; or
- Any other negative consequences affecting one's terms and conditions of employment or status.

If you believe that you or another employee has been retaliated against in violation of this Code, you should report it using the reporting lines described in the Code.

Employees are expected to act in good faith in making complaints under the terms of this Code. Anyone determined to have made a complaint in bad faith may be subject to appropriate disciplinary action.

If we determine there is a violation of the Code, we will take appropriate action, including but not limited to corrective actions such as coaching, re-training, and/or disciplinary action up to and including termination of employment in accordance with local law. Certain violations of the Code may also necessitate that Amryt report wrongdoings to appropriate government or regulatory agencies, which may result in financial or criminal liabilities for any individual(s) involved. The Company reserves the right to pursue or cooperate in the prosecution of any crimes suspected by individuals covered by this Code or other Company policies, and to seek restitution or damages if warranted.

TRUTHFUL COMMUNICATION

Amryt has authorized specific individuals to speak to the media, government authorities, investors and others on behalf of the Company regarding our products. If you have not been granted specific authorization, then you must not speak on the Company's behalf or purport to do so.

There are several communications channels the Company uses to inform the public and others about its products including: direct contact with healthcare professionals ("HCPs") by Company representatives, interactions with the scientific community through authorized liaisons, the Internet, Company websites, specific social media accounts and outlets, conferences and other industry gatherings, and journal advertisements.

We must always communicate honestly and ethically when discussing our products, our science and our business. In every interaction you engage in on our behalf with patients, HCPs, regulators or others, you are accountable for the nature and content of the communications. To that end, anything we say about our Company or our products must be lawful, accurate and approved by the appropriate company personnel before it is used or communicated. This is crucial not just to our business reputation, but also to the health and well-being of the patients who are intended to benefit from our products.



Product labelling and advertising are highly regulated and therefore subject to intense scrutiny. Therefore, all communications – written and verbal, and however publicized – must follow these standards at all times:

- Truthful, honest and fair balanced;
- Up-to-date and substantiated by objective evidence;
- Approved by appropriate Company personnel through the applicable process; and
- Compliant with all company policies.

Discussions regarding a therapy or treatment in a particular country or region is highly regulated based on the role of the person at the company. All discussions regarding Amryt products or clinical programs must be consistent with all regional applicable industry codes/laws/guidance. Once approved by the relevant regulatory authority, all products claims and promotions must be consistent with approved labelling and prescribing information.

TRUTHFUL COMMUNICATION

INTERACTIONS WITH HEALTHCARE PROFESSIONALS AND ORGANISATIONS

Integrity is one of Amryt's corporate values. It is ingrained into all that we do, including in all of our interactions with the healthcare community.

Interactions with HCPs and healthcare organizations ("HCOs") are highly regulated around the globe. Amryt interacts with HCPs and HCOs in many ways, and always strives to ensure those interactions are compliant with applicable laws, rules and protocols. That includes when we meet and engage with HCPs in the marketing and promotion of our products; our interactions with healthcare professionals during medical conferences and in the course of other scientific exchanges; the selection of investigators for our clinical research programs; and engagement of consultants for advice and services we need.

HCPs include doctors, nurses, pharmacies, formulary or benefit administrators, and any other prescribers and administrators who may recommend, purchase or influence healthcare delivery. HCOs include hospitals, clinics, medical practices, universities, pharmacies, professional organizations, medical societies and payers, distributors/ wholesalers and specialty pharmacies.

Amryt recognizes the importance of providing HCPs and HCOs with the information needed to make informed decisions in support of patient care. All interactions and communications made on Amryt's behalf with HCPs and HCOs must be conducted in a fair and balanced manner, and consistent with rigorous scientific standards. It must never be misleading, nor violate any applicable medical, legal or regulatory standards. Ultimately, sound patient care must guide our interactions. Thus, Amryt personnel may never improperly influence an HCP's or HCO's treatment decisions.

Employees must collect and report any direct or indirect transfers of value, including payments to HCPs and HCOs, consistent with applicable laws and regulations.

Amryt tracks and reports payments and other transfers of value provided to HCPs and HCOs as required by applicable laws, rules and codes, which may vary based on location. This includes the value of food and beverages provided, consulting fees, speaker fees, travel and lodging, grants and payments of any kind. Our employees, consultants and vendors are expected (1) to know the transparency and reporting requirements that apply in their country and regions and (2) to comply with those requirements as well as Amryt's procedures on tracking and reporting relevant payments and benefits. Anyone with questions regarding these obligations must promptly seek guidance using one of the reporting lines described in this Code.

TRUTHFUL COMMUNICATION

COMMUNICATIONS WITH INVESTORS AND THE MEDIA

As a publicly-traded company, Amryt has a responsibility to ensure that only accurate information is provided to its investors and other audiences, including the media. Employees are not authorized to answer any questions or requests for information from the media, an investor or any other public entity. Instead, requests for information should be referred to the Investor Relations or Corporate Communications departments.

If you are unsure about how to respond to a particular inquiry, contact the Legal Department.

Q: A reporter saw my LinkedIn profile and called me looking for some basic information about the Company. Can I answer her questions?

A: No. Even simple questions must be rerouted to our Corporate Communications Department because you may not have all the relevant facts. Even if you provide accurate information, releasing it at the wrong time could interfere with the Company's plans. In addition, uncoordinated disclosure could pose problems under securities laws if the information released was material inside information. Simple information and disclosures that may seem harmless can create problems.



ETHICAL COMPETITION

ANTITRUST LAWS AND UNFAIR COMPETITION

Amryt is committed to the principle of full and fair competition, and we expect our employees to comply with antitrust laws and competition laws everywhere we do business.

Amryt pursues competitive success through lawful and ethical means. Therefore, we comply with competition and antitrust laws that apply wherever we operate. Laws regulating competitive activity are complex, but they generally prohibit agreements between competitors that relate to price or terms and conditions of sale or that create any other hindrance on full and fair competition. All individuals subject to this Code have a responsibility to be aware of these laws. Violations may lead to severe penalties for Amryt and for any individuals involved – including those who know of possible violations but fail to report them.

Q: What conversations can I have with my peers and business contacts?

A: We understand that you may have informal communications from time to time, but it is important to avoid all of the following:

- **Discussions, whether oral or written, with existing or potential competitors about price; discounting policies; division of territories; costs; sales; bids; markets or customers; or any other terms of sale.**
- **Discussions, whether oral or written, with suppliers or customers about actions that may exclude competition from the marketplace;**
- **Entering into any agreements with the purpose or effect of preventing suppliers or customers from supplying or buying from competitors; and**
- **Providing or offering anything of value to any existing or potential customer, supplier, or payer to help Amryt's business or to hurt a competitor's business.**

Examples of activities that may be permissible under the terms of this Code include participation in trade groups and competitive intelligence gathering from publicly available sources. However, in both instances, employees must take care to share, gather and use information in a compliant, fair and ethical fashion. Questions about how employees should proceed in navigating any interactions that may implicate their obligations under this Code or applicable law should be directed to their supervisor or another reporting channel **before** they attend any such function or obtain industry information. Failure to seek guidance or clarification ahead of time may itself be deemed a violation of this Code.

ETHICAL COMPETITION

INSIDER TRADING

Insider trading is a criminal offense in many jurisdictions. Amryt is committed to following trading rules.

All employees, directors and officers are prohibited from buying, selling or engaging in any other transaction with respect to securities of Amryt or any other company – whether affiliated with Amryt or not – while in possession of material, non-public information.

Material information is any information a reasonable investor would consider important in making an investment decision. Examples may include financial data; results of clinical trials; key decisions of regulatory authorities; key business-development deals or other strategic decisions; hiring or separation of executive team members; threatened or filed litigation; or other major developments affecting our business.

Employees cannot use non-public information gleaned through their employment to buy or sell securities. They also may not share, tip, or disclose this information to others.

Q: Can my spouse invest in Amryt or related companies if I am not involved in the investment choices?

A: No. These rules apply to anyone with access to non-public information about Amryt, and their family members, including spouses, significant others, children, parents or others who live in the same household.

Securities laws and violations are taken very seriously. Please refer to the Company's Conflict of Interest Policy for more information. If you are uncertain about the constraints that may apply to any purchase or sale of any securities by virtue of your relationship with Amryt, you must consult with the General Counsel, or their designees, before making any such purchase or sale.



ETHICAL COMPETITION

PREVENTING BRIBERY AND CORRUPTION

We will not attempt to improperly influence public or private individuals to secure a favourable advantage for Amryt. These behaviours are counter to our principles and the law.

Amryt seeks competitive advantages through the talent and hard work of our community and the quality of our products. We build on these advantages only via honest and ethical means – and never gifts, favours or monetary support. Thus, we strictly prohibit employees or anyone acting on Amryt’s behalf from offering, giving, requesting, accepting or receiving a bribe or kickback of any kind and for any reason. Bribes and kickbacks include but are not limited to money, fees, commissions, credit, gifts, gratuities, things of value or compensation that is provided, directly or indirectly, and that has as one of its purposes, the improper obtaining or rewarding of favourable treatment in a business transaction. Bribes and kickbacks are prohibited by law in all locations in which we do business, and they are always contrary to Company policy and practices.

In many countries, anti-kickback and bribery laws prohibit the offering of bribes to anyone, not just public officials.

These prohibitions generally apply not just to direct interactions, but also to payments or promises made through third parties, including our distributors, vendors, or consultants. Employees of the Company and others to whom this Code applies may be considered responsible for the actions of the distributors, vendors and consultants with whom they interact; thus, they must take particular care to educate those partners on the seriousness of this principle and ensure compliance.

Several locations in which Amryt does business have Anti-Bribery/Anti Corruption laws that may impact our business. Example of such laws we need to adhere to (but may not be limited to) are:

- Foreign Corrupt Practices Act (FCPA)(US)
- UK Bribery Act
- French Criminal Code and Anti-Gift Decree for Healthcare Professionals
- German Criminal Code and Anti-Corruption Act
- Brazil Clean Companies Act (Lei da Empresa Limpa or Lei Anticorrupção)

ETHICAL COMPETITION

The following is guidance on some actions that may implicate these prohibitions:

- Do not, directly or indirectly, make, offer or promise anything of value, including free or discounted services, that are intended to improperly influence the actions of a government official or any other person, or to gain an unfair business advantage, and do not permit any third party acting on our behalf to take any such action.
- Consult with the Legal or Compliance Department before providing or paying for any meals, refreshments, gifts (generally not permitted), travel or lodging expenses, services, honoraria, fees, contracts, reimbursement of expenses or anything else of value, to a government employee, institution, agency, or entity;
- Inform third parties acting on our behalf, including vendors, contractors or consultants, of the requirements of the Code, and related policies, and provide them a copy;
- Ensure proper approvals are obtained before committing the Company to any contracts or fee-for-services agreements of any kind.

In addition to exposing Amryt to severe sanctions, employees, officers, directors or others acting on Amryt's behalf who engage in any of the conduct above may face substantial financial and criminal liability, which may result in fines or imprisonment.

INTERACTIONS WITH COMMERCIAL AND PATIENT-RELATED ENTITIES

In addition, Amryt engages with patients and patient organizations that can provide a unique perspective to our efforts in creating innovative new treatments. At times, we will also interact with these groups to help raise awareness of health-related issues and to share information on diagnosis and treatment. In the spirit of acting responsibly and with integrity at all times, it is important that the financial support we provide to organizations is appropriately documented and recorded. Our work with these entities should never include promotion of Company products.



ETHICAL COMPETITION

INTERACTIONS WITH GOVERNMENT OFFICIALS

Other important relationships are those with government officials in many countries and at every level – national or federal, state, and local or provincial. In all such cases, Amryt employees and others working on the Company’s behalf are strictly prohibited from offering or providing a payment, fee or gift that is intended to improperly influence a government official or gain an unfair advantage.

Laws that cover these interactions include but are not limited to the U.S. Foreign Corrupt Practices Act of 1997 (“FCPA”) and the United Kingdom Bribery Act. These laws strictly prohibit the provisions of business courtesies and other financial arrangements, such as gifts, travel, entertainment, commissions, shares, debt forgiveness or discounts to non-U.S. government officials, employees and other similar individuals and entities. These laws also may apply even when a payment occurs outside of the recipient’s home country or where an intermediary or third party is used to facilitate the transaction or arrangement. They further make it illegal to inaccurately record transactions in Amryt’s books and business records.

Amryt is required to comply with all anti-bribery and similar laws elsewhere and commits to fulfilling these obligations at every level.

Amryt strictly prohibits the direct or indirect offering, authorizing, promising or making of any payment or gift of anything of value to foreign government officials and public employees (including but not limited to, employees of government-owned or controlled companies or institutions such as hospitals and universities), candidates for political office and political parties (including party officials) for purposes of influencing an official act or decision to award or retain business, or to gain an improper business advantage.

Q: An HCP who works for a state sponsored hospital has offered to provide Amryt with consultancy work for cash to assist with our dossier submission. They have informed Amryt that they have provided this previously for other pharmaceutical companies with positive results. Should I proceed?

A: No. Amryt strictly prohibits offering payment to a government official for the purpose of influencing a decision relating to Amryt’s products.

ETHICAL COMPETITION

RECEIVING GIFTS AND OTHER PAYMENTS FROM BUSINESS PARTNERS AND THIRD PARTY VENDORS

Amryt prohibits employees and others who act on its behalf from receiving, as well as offering or providing, what could be considered bribes or kickbacks.

Anti-bribery laws and this Code, as well as other Company policies, apply when an employee receives or is offered payments, gifts or gratuities that may unduly influence Amryt's business judgment or practices. You must review the "Conflicts of Interest" section of this Code and, if you are offered any payments, gifts or gratuities, you must follow its guidelines.

Gifts and other gratuities can only be accepted when they are of nominal value and do not impact business decisions.

Employees and others subject to this Code may not accept, or permit their family members to accept, gifts, gratuities or other favours from any customer, supplier

or other person doing or seeking to do business with the Company. As a general matter, employees should never accept payments, gifts or gratuities from an HCP.

On occasion, employees may accept small, inexpensive gifts, modest meals or modest entertainment from an existing third-party vendor, contractor or supplier (other than an HCP), provided any such gift, meal or entertainment is not (a) of more than token or modest monetary value; (b) a cash equivalent; (c) susceptible of being construed as a bribe or kickback; (d) made or received on more than an occasional basis; (e) solicited by the employee; (f) a potential conflict of interest; or (g) in violation of applicable laws, regulations or guidance. Any gifts that are not considered modest or inexpensive should be returned immediately and reported to your manager or through any of the methods outlined in this Code.

Q: Can I give gifts to business contacts?

A: You may not give gifts to government officials, regardless of how well you know them or the gift's purpose, without first speaking with the legal or compliance to make sure it doesn't implicate anti-bribery laws. You also must take care if providing gifts or donations to candidates for office that you do so in a manner that is clear that the gifts are made in your personal capacity.

Gifts to business contacts are only acceptable if they are small, of modest value, provided infrequently, and otherwise comply with the "Conflict of Interest" section of this Code.

ETHICAL COMPETITION

POLITICAL CONTRIBUTIONS AND OTHER RESTRICTIONS

Amryt supports its employees', officers' and directors' engagement in their communities as citizens. However, they must take care that their activities do not potentially implicate Amryt's obligations to report its contributions, lobbying and other political activities.

CONTRIBUTIONS

Many countries, such as the United States have laws regulating or restricting the Company's ability to make contributions to political campaigns. Accordingly, the contribution of Amryt assets or services for any political purpose – whether for a candidate, campaign or other cause – must first be reviewed by the Legal Department. Company Employees who are not authorized to engage in political or lobbying activity may not undertake any political activity or make any loan, donation, contribution or payment to a political candidate, party or political action committee on behalf of the Company. They also may not cause the Company to reimburse any individual who provides such support. These prohibitions include using Company time, space or other resources for political purposes.

LOBBYING

Lobbying includes all activities and statements intended to influence government decisions or behaviour. Examples include communicating with a member or employer of a legislative body for purposes of influencing general or specific legislation,

communicating with other government officials in order to influence decision-making or engaging in research or activities to support or prepare for such communications. Amryt Employees may not engage in lobbying on behalf of Amryt without first getting approval of the Legal Department.

Those who are appropriately authorized to lobby on Amryt's behalf must strictly comply with applicable laws and regulations that restrict their interactions with government officials. This includes but is not limited to reporting and tracking of expenditures.

None of these rules are intended to prevent employees from engaging in political activity or advocacy as a private citizen, in the employee's own name, provided that the action is exclusively of their own accord and is not an indirect means of accomplishing something that violates this Code or the law.

TRADE RESTRICTIONS

Amryt complies with applicable trade laws and other regulations, concerning how goods or assets may be carried or conveyed across national borders. These laws may change in response to global, national or local political and security concerns. Thus, employees must consistently work with their supervisors and the Compliance Department or Legal Department to ensure they are aware of and in compliance with applicable laws and regulations at all times.

MUTUAL RESPECT AND SAFETY

AMRYT WORKPLACE POLICIES

Amryt is a place where all people are treated with dignity and respect.

Amryt strives to create and maintain a work environment where people want to work and in which people are treated with dignity and respect. We also expect that our employees will treat each other fairly, and with openness and honesty. Our work environment should be characterized by mutual trust and the absence of intimidation or abuse. Employees should be able to work in a safe, constructive atmosphere, free from verbal and physical harassment.

The following should be true in all our dealings with each other and with those outside the Company:

- We treat colleagues fairly and with respect, and we are open and honest with each other.
- We do not discriminate when hiring or making employment related decisions.
- We operate a positive work environment in which people know their contributions are valued.



MUTUAL RESPECT AND SAFETY

EQUAL EMPLOYMENT OPPORTUNITY

Amryt values diversity and is firmly committed to providing equal opportunity in all aspects of employment, without regard to any individual's race, colour, ethnicity, ancestry, national origin, age, religion, disability status, gender or expression, sexual orientation, marital status, pregnancy, child birth or related medical conditions, military service, veteran status or any other criteria or characteristic which causes a person to be part of a protected class under applicable laws ("protected characteristics"). Information regarding this principle and protections can be found in Amryt's Equal Employment Opportunity Policies and from the Human Resources Department.

Amryt will not tolerate unlawful discrimination or harassment of any kind against employees or third parties who perform work for the Company.

Amryt strictly prohibits any unlawful discrimination or harassment of any kind against employees or third parties who perform work for the Company. This includes any form of unwelcome or abusive conduct or action, such as verbal, non-verbal, written, electronic or physical conduct that creates an intimidating, hostile or offensive work environment; unreasonably interferes with an individual's work performance; adversely affects an individual's employment opportunities; or that demeans or shows hostility toward an individual because of his or her protected characteristic(s).

REPORTING DISCRIMINATION OR HARASSMENT

As with all elements of this Code, Amryt takes its commitment to preventing discrimination and prohibiting harassment very seriously. All employees and others subject to this Code share in that commitment as a critical element of their responsibilities to Amryt.

Therefore, all employees are encouraged to speak out if they believe in good faith that an individual's conduct violates these rules and principles. To do so, they can make use of any of the reporting channels described in this Code. The Company takes all such reports seriously and reviews them promptly. When we determine inappropriate conduct has occurred, it takes remedial action against offending parties, including immediate termination of employment when warranted and in accordance with local law.

Retaliation of any kind against any individuals who raise a good faith claim of discrimination or harassment is strictly prohibited. It is contrary to this Code and, in some cases, applicable law.

MUTUAL RESPECT AND SAFETY

SAFETY IN THE WORKPLACE

Each person should follow health and safety laws, rules and practices applicable to your activities for Amryt, and to the business locations where you are working. You should report immediately all unsafe conditions, accidents or near misses, and any work-related injuries or illnesses that occur at any Amryt facility or other property under the Company's control.

Amryt is committed to a workplace free of any threats to health or safety. Employees must abide by applicable safety rules and regulations in all of our facilities, including those imposed by local governments and by facility management. All accidents and work-related injuries, emergencies or threats to health and safety must be reported along appropriate reporting lines for each individual's work location.

Employees who drive on behalf of the Company are expected to do so in compliance with local applicable law and otherwise operate their vehicles in a safe manner. This includes but is not limited to refraining from using phones or other electronic devices while driving.

Violence and threats of violence are strictly prohibited and must be reported immediately.

DRUG AND ALCOHOL ABUSE

Amryt is committed to a workplace free of the health and safety issues associated with substance and alcohol abuse. The use of illegal drugs and the abuse of alcohol or over-the-counter or prescription medications are prohibited in the workplace and while on Company business, regardless of the location.

Working in any Company facility, operating a Company vehicle or a vehicle subsidized by the Company, or otherwise conducting Company business in any location while under the influence of alcohol or illegal drugs is strictly prohibited. At Company-sponsored events, exceptions may be made for the responsible and safe consumption of alcohol.

Q: How has Amryt policy changed as a result of COVID-19?

A: Like every business, we have had to evolve during the pandemic, an evolution that is continuing today. Consult the applicable COVID-19 Policy for more information, protocols and business developments that have occurred as a result of COVID-19. This includes employee health and safety-related information and vaccine mandates in the US. The situation is constantly changing globally. We recommend you consult with your supervisor and/or a representative of the Human Resources Department whenever you have questions about local conditions, Amryt's protocols or concerns about your safety.

MUTUAL RESPECT AND SAFETY

CONFLICTS OF INTEREST

We recognize and respect the right of our employees, officers and directors to engage in outside activities which they may deem proper and desirable as long as these activities do not interfere with the performance of their duties for Amryt Pharma or their ability to act in Amryt Pharma's best interests.

Employees, officers and directors must refrain from activities that pose a conflict of interest or the appearance of a conflict of interest in all that they do.

A "conflict of interest" occurs when your personal, financial or other outside interests interfere with the interests of the Company. Even the appearance of a conflict of interest can damage your reputation or that of Amryt. It can arise whenever you take action or have an interest that prevents you from performing your duties with honesty and integrity. You should avoid situations where a reasonable person would question whether you were inappropriately influenced in making a business decision.

This means that all employees, officers and directors should abide by the following guidelines at all times:

- Never seek or accept payments, fees, loans or discounted services from any person or company with whom we do business or may do business without the prior approval of the Legal Department.
- Do not take advantage of Company information, resources or corporate opportunities for personal profit.
- Do not hold an ownership interest or other personal business association with a competitor.
- In certain cultures where declining a gift would likely be considered insulting or cause offense, contact the Compliance or Human Resources Department for further guidance.



MUTUAL RESPECT AND SAFETY

- Employees should not accept personal honoraria for activities that closely relate to the work you perform for Amryt Pharma.
- All speaking engagements, both formal and informal, must be approved in advance by your manager and the Legal Department. Any materials used in such engagements must be approved in advance by the Company.
- Employees may not have “second” jobs or consulting relationships that may interfere with their work for Amryt. Before accepting any such position, employees should review them with the Legal Department and Human Resources. Even if approved, employees with outside engagements will be required to abide by all obligations to the Company, including confidentiality restrictions and this Code.
- Before serving as an officer or director of another for-profit company, you must obtain approval of the General Counsel. Involvement in charities and other non-profit organizations is encouraged throughout the Company, but, if you will be representing the Company in any such activities, you must first obtain Company approval.

Exceptions to these rules may be permitted from time to time for small holdings in publicly traded companies. Employees should seek guidance from the Legal Department before investing or conducting business with any such entity to determine whether a particular relationship or transaction may violate the terms of this Code or any other applicable rules.

Doing business with friends and relatives poses significant risk and must be undertaken carefully.

Conflicts may arise or appear to arise whenever an employee hires, manages or otherwise conducts Company business with a close personal friend, relative or someone with whom they have had a close relationship. Due to the potential for perceived or actual conflicts resulting from these relationships, the Company does not permit the employment of relatives in direct reporting lines, including both direct and indirect reporting and/or supervision.

Employees who are in a position to do business with a close personal friend or relative on behalf of the Company must disclose the relationship to the Legal and Compliance Departments, including if your family member or close friend has an ownership interest or is a manager or executive for a vendor or business partner. If you are uncertain about any potential conflict of interest, seek guidance from the Human Resources, Legal and Compliance Departments.



MUTUAL RESPECT AND SAFETY

USE OF COMPANY ASSETS

We all must take care to safeguard Company equipment, services and information out of respect for each other and in order to maintain the Company's competitive advantages.

All Amryt systems and hardware, the records and information stored on them and all records related to use of those systems are the property of Amryt and should generally only be used for Company business. Amryt's "systems and hardware" include computers, laptops, tablets, phones, e-mail, voice-mail, drives, internet access and other resources provided or subsidized by Amryt. Incidental personal use is permitted if such use does not violate any laws or Amryt policies and does not interfere with job performance. Failure to use these resources appropriately may expose the Company's data and systems to substantial risk.

These resources may never be used to access, receive or transmit material that is illegal, inappropriate or otherwise violate Company policies. Software that is not properly licensed or lawfully acquired may not be introduced into a Company computer or communication device. No software of any kind may be introduced onto these systems or devices without the express and advanced approval of our corporate security team.

All Company devices and electronic or digital accounts must be password-protected and properly secured at all times.

Amryt equipment is to be used only for Company business, though occasional use for incidental personal matters may be permitted when it is consistent with other policies and does not prevent employees from fulfilling their duties. ***Employees should not expect any rights of personal confidentiality or privacy when using Amryt's systems and hardware.*** Where legally permitted to do so, Amryt may, in its sole discretion, inspect the files, records, e-mails, voice-mail messages and telephone records on Amryt's systems and hardware, and may monitor employee internet use in each case at any time without advance notice or consent where permitted by applicable law.

Employees are expressly prohibited at all times from using Amryt's property and electronic systems in any way that may be disruptive, offensive or harmful to others, including but not limited to, the downloading, display or transmission of profanity, vulgarity, material with any sexual content or any other material that would violate this Code, Company policies or be construed as offensive, harassing or disrespectful. These provisions are not intended to interfere with employee communications or actions that are protected or required by federal, state or local law, including, but not limited to, the U.S. National Labor Relations Act.

MUTUAL RESPECT AND SAFETY

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

The information and ideas that we produce or acquire in the course of our work are vital to our business and to our ability to compete. We seek to protect these important assets through protection as confidential information and valuable intellectual property. Examples of confidential information include, but are not limited to: information related to our products; customers; marketing plans; sales activities, financial results; pricing practices; clinical trial results; business development opportunities; manufacturing process; regulatory filings; scientific and trade secrets, and employee records. For purposes of this Code, we also treat as confidential any information provided to us on a confidential basis by third parties during a business relationship. Financial information should, under all circumstances, be considered confidential except where its disclosure is approved by the Company, or when it has been made public in a press release or a report filed with the SEC.

Each of you plays a significant role in safeguarding Amryt's confidential information. Our confidential information may not be provided to, or discussed with, anyone outside the Company unless the disclosure has been approved through the appropriate internal approval procedures or required by legal mandate. Except in certain limited circumstances specified by the Legal Department, a written nondisclosure agreement, in a form approved by the Legal Department, must be signed by the intended recipient of any Amryt confidential information. Publications and

presentations that include any Amryt information must be approved in accordance with Amryt's publication policies prior to being submitted.

The following principles should guide your actions in handling Company information:

- Be aware of your surroundings to ensure Company information is not disclosed to outsiders inappropriately;
- Obtain nondisclosure agreements, in a form approved by the Legal Department, from third parties before they are granted access to any Company information.
- Only approved Company signatories may sign nondisclosure and confidentiality agreements. Please contact the Legal Department before implementing or signing one.
- Dispose of Company information properly.
- Secure all Company information when working outside of the office or an open area.

Any suspected or known access to Company information by non-Company actors must be reported immediately to your manager or the Global Compliance Officer or General Counsel.

MUTUAL RESPECT AND SAFETY

USE OF SOCIAL MEDIA

Engagement with social media has become a regular form of communication in our society. Amryt understands that many employees will engage on social media platforms like Facebook, Instagram, YouTube, Twitter and online networking or discussion groups that fit within this broad category of content outlets. Nevertheless, we expect that employees will be mindful that their posts and comments may be seen as representative of the Company if they include the Company's name, logo, assets, or information, or if they reference any marketed products directly or indirectly.

Employees should follow these principles whenever engaging on social media related to Amryt:

- Follow the rules in Amryt's Social Media policy, and other provisions in this Code, including the Equal Employment Opportunity, Research and Development and Communications with Investors and the Media provisions.
- Be honest about your affiliation with the Company.
- Be responsible and exercise common sense and good judgment.
- Do not post any material that violates applicable harassment, discrimination or retaliation rules.

If you have any doubts about whether a post or comment may be appropriate, consult with the Human Resources or Legal Department **before** posting.

Q: Can I share or repost Amryt updates to my own LinkedIn feed?

A: Employees are permitted to repost or share publicly available corporate communications to their own LinkedIn feeds only if they do not provide additional commentary in doing so. Employees who wish to include additional commentary in social media reposts must receive authorization from Legal, Human Resources and Corporate Communications prior to doing so.

INTEGRITY IN ALL THAT WE DO

COMPLIANCE WITH LAWS, RULES AND REGULATIONS

The pharmaceutical industry is highly regulated. Amryt is committed to following all applicable laws, rules and regulations in all that we do.

Therefore, all employee, officers and directors must make compliance with these obligations a top priority in performance of their duties. This includes compliance with all laws and regulations concerning the development, manufacturing, marketing, promotion and distribution of our products; securities and antitrust laws; privacy laws; employment laws; and global regulations and local laws covering the duties of employees, officers and directors.

In certain aspects of our business, we have made further commitments to comply with applicable and accepted codes of conduct. In addition, operating in multiple countries across the globe means that more than one set of laws may apply to any particular business line or activity. The Company will abide by and enforce these additional and/ or stricter requirements whenever applicable. Employees with questions regarding which standards may apply to their activities or locations should reach out to their supervisors, the Compliance Department or make use of the reporting lines provided elsewhere in this Code.

At all times and in all locations, the actions of each Company employee must reflect Amryt's commitments to ethical actions and integrity in its dealings with customers, vendors, suppliers, employees and others.

Examples of industry codes that may apply to certain business lines or activities include the PhRMA Code on Interactions with Healthcare Professionals (U.S.); the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code on the Promotion of Prescription-Only Medicines to, and Interactions with, Healthcare Professionals (E.U.); Association of the British Pharmaceutical Industry Code of Practice (U.K.); the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA) Code of Pharmaceutical Marketing Practices (international); and the Irish Pharmaceutical Healthcare Association (IPHA) Code of Practice for the Pharmaceutical Industry.

INTEGRITY IN ALL THAT WE DO

ACCOUNTING AND OTHER BUSINESS RECORDS

Amryt is committed to providing its stockholders and other parties with fair, complete and accurate information about our business as required by law.

The integrity, reliability and accuracy of our books, records, financial statements and disclosures are fundamental to our business operations and its legal and regulatory obligations. Therefore, all employees, officers and directors share in the responsibility to ensure that these and other Company documents are maintained honestly and fairly. All Company books, records and accounts will be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. This policy applies to all documents created or received in the course of business activities, no matter what the medium, including hard and electronic copies, e-mails, texts, voice-mails, notes, audio and visual recordings and photographs.

Financial statements must conform to generally accepted accounting rules and the Company's own accounting policies. No undisclosed or unrecorded

account or fund may be established for any purpose. No false or misleading entries may be made in any Company books or records for any reason, and no disbursements of corporate funds or other corporate property should be made without adequate and appropriate supporting documentation. In addition, the Company provides full, fair, accurate, timely and understandable disclosures in reports and documents filed with, or submitted to, the SEC and in other publications. Any actions taken or statements made that are contrary to this commitment may result in disciplinary action, including termination of employment.

It is your responsibility to report any concerns regarding questionable or fraudulent accounting or auditing matters or complaints regarding accounting, internal accounting controls or auditing matters. Such concerns or complaints should be raised immediately via the reporting channels provided elsewhere in this Code.

Documents and other records may only be destroyed when they are no longer needed for any legitimate or reasonable business, legal or regulatory purpose. Each Company department will develop and adhere to a records retention schedule that will specify record retention periods for each type of business record in compliance with applicable law. From time to time, the Legal or Compliance Departments may direct you to retain documents for a longer period of time. These instructions must be followed in all circumstances.

INTEGRITY IN ALL THAT WE DO

RECORDS RETENTION

Company records must be maintained, stored and, when appropriate, destroyed in accordance with best practices and in compliance with applicable laws and regulations. Under certain circumstances, such as litigation and government requests, the Company may be required to preserve documents and information beyond their normal retention period. Never create, alter, or destroy records or documents for the purpose of impeding the efforts of any investigation, litigation or audit or other records request.

Amryt follows these and similar laws and regulations. Employees must ensure they are familiar with any that apply to their work and abide by the relevant restrictions.

Amryt operates in several locations with records retention and reporting laws that may impact our business. These laws include (but may not be limited to):

- The US Health Insurance Portability and Accountability Act (“HIPAA”)
- The EU General Data Protection Regulation (“GDPR”)
- The US False Claims Act (“FCA”)
- The UK Data Protection Act (“UK DPA”)
- The US Food, Drug and Cosmetics Act (“FDCA”)



INTEGRITY IN ALL THAT WE DO

PRICE REPORTING

In certain countries, Amryt's products may be reimbursed by federal and local agencies. Therefore, our Company must provide accurate pricing information to those entities. We do so in all cases and ensure that we report this information in a timely manner. Impeding the Company in these efforts is considered a violation of this Code.

PRIVACY

Many countries in which we do business impose restrictions on how we can collect and protect personal information. To that end, we take our obligations under the Health Insurance Portability and Accountability Act (HIPAA) and the General Data Protection Regulation (GDPR) seriously and this Code is designed to assist our employees in complying with these laws. In all cases and locations, we adhere to the applicable legal obligations and to the basic principle that personal information should never be shared without the consent of the individual to whom it applies and with appropriate safeguards in place.

Personal information we collect and manage may include information concerning our employees; patients who have been prescribed our products; healthcare professionals; and those with whom we conduct business. Additionally, we may collect personal information for our research activities, pharmacovigilance, certain customer support services, sales and other business related activities.

For purposes of this Code, "personal information" is any information related to an identified or identifiable natural person. An identifiable natural person is one whose name is known or whose identity can be determined, directly or indirectly, by reference to the information about the person that is known or available including by combining such information. Some countries protect personal information, as broadly defined. Other countries protect certain kinds of personal information such as health information or financial information.

You must report any incidents of improper or accidental disclosure or use of personal or personal health information immediately to DPO@amrytpharma.com. Failure to report any such incidents of which you are aware may be considered itself a Code violation.

INTEGRITY IN ALL THAT WE DO

Collection and use of personal or personal health information is important to our business. **Employees, officers and directors must be mindful that unlawful use or disclosure of this information harms the person about whom it pertains and result in significant penalties for Amryt and its personnel.**

You must adhere to the following practices in handling or accessing any personal or personal health information:

- Follow all Company and department or business-line specific policies and procedures for handling and destroying personal information.
- Collect personal information only if consented, where there is a legitimate business need, and only as permitted under applicable laws.
- Collect the minimum amount of information necessary to achieve the business purposes.
- Obtain and retain written and specific consent for the collection and use of personal information.
- Never seek, obtain, receive, or access personal health information about specific patients from healthcare professionals or patients without the appropriate consent.
- Store personal information for only so long as is necessary to achieve the specific business objective for which it was collected.
- Share information only with those within the Company who have a legitimate need for the information and who agree to keep the information secure.

You must report any incidents of improper or accidental disclosure of personal or personal health information immediately, using the reporting lines described elsewhere in this Code. Failure to report any such incidents of which you are aware may be considered itself a Code violation.



INTEGRITY IN ALL THAT WE DO

RESEARCH AND DEVELOPMENT

Amryt conducts scientific research, clinical trials and reporting of results consistent with the highest ethical and scientific standards. It also follows all applicable industry standards and regulations, including the International Conference on the Harmonisation Good Clinical Practice Guidelines (“ICH GCP”) and the U.S. Food and Drug Administration’s Good Clinical Practice (“FDA GCP”) guidelines. All employees are expected to adhere to these standards in all research and development activities. These obligations are based not just on our legal and regulatory responsibilities, but also our respect for the well-being and safety of research participants and, ultimately, the patients who depend on our products.

MONITORING DRUG SAFETY AND QUALITY

Amryt is committed to understanding the safety profile of each of our products through a comprehensive collection, review and analysis of necessary and available data. This includes understanding adverse events and product quality complaints associated with the use of our products.

Amryt employees who become aware of any adverse events or product quality complaints involving an Amryt product or product candidate should report the event to the drug safety department within one (1) business day of becoming aware of the event or complaint. Reports can be made by emailing medinfo@amrytpharma.com. Reports may also be made via Amryt’s UK toll paid telephone number at +441604 549 952 which is available in all countries, +1 855 303 2347, +1 844 312 2462 (for Mycapssa® related enquiries, adverse events or product complaints), or our University International Freephone Number at 00 800 4447 4447. Further country specific numbers can be found by visiting <https://amrytpharma.com/healthcare-professionals/medical-information-enquiries>.

For purposes of this Code, an “adverse event” is any unfavourable medical occurrence or event, including lack of effect, in a person who has received one of our products. Adverse events are typically reportable even if the event is not necessarily caused by treatment with our product. Information about an adverse event may be learned in a variety of different ways, including through phone calls, letters, e-mails, completed response forms from our marketing programs, or casual conversations.

Other reporting and recordkeeping requirements may apply. The Company provides training on these obligations, in which employees must participate on a regular basis.

INTEGRITY IN ALL THAT WE DO

RESPECT FOR OUR ENVIRONMENT

The natural environment is a precious resource on which we all depend. Amryt policies and practices recognize its value and the Company is committed to operating in a manner consistent with applicable environmental laws and regulations.

In the U.K., U.S. and elsewhere, certain laws may impose severe penalties against those who contaminate the natural environment or waste natural resources. Amryt shares in the principles that animate these restrictions. Therefore, all employees, officers and directors must act in a way that minimizes any

potentially negative environmental impact by our business activities. We must also commit to minimizing the use of any materials that may cause environmental damage or waste and disposing of all waste products through safe and responsible methods.

At all times, employees must be aware of and abide by any environmental or waste-related restrictions that impact their activities. Questions about any particular products or practices should be directed to the Global Compliance Department or raised through the other reporting channels described in this Code.

DEDICATION TO OUR COMMUNITIES

Amryt is a good corporate citizen. Therefore, we support initiatives that help our communities grow and develop. Employees must share in, and lead, in this commitment.

We believe that we have a responsibility to our patients and their families that goes beyond our products. Having a positive impact on society and reducing our impact on the environment strengthens our company, reinforces our commitment to bring rare disease and orphan therapies to people that significantly improve their lives. As an organization, we contribute to projects and programs through charitable contributions and, donations. Given our unique market, we prioritize

activities and programmes that provide patients with better access to information and improved treatment options. Amryt also supports the education of healthcare professionals and other industry professionals in the form of research grants.

Additionally, through our Amryt Cares program, we support our employees who undertake voluntary activities that empower our communities and the environment. With this program, we encourage you to pursue activities in health, education, social services, and the environment, as well as cultural and civic projects that are important to you.

WAIVERS AND AMENDMENTS

In rare circumstances, waiver of specific provisions of this Code may be permitted under the following terms:

Only the Board of Directors may waive specific provisions of this Code. In the event of an approved waiver involving the conduct of an executive officer or director, appropriate and prompt disclosures must be made to the Company's shareholders as required by applicable law and stock exchange rules.

Amryt reserves the right to modify any aspect of its compliance program, including this Code, at any time for any reason, and with or without notice. All amendments to this Code must be approved by the Board of Directors or a committee of the Board and disclosed to the Company's stockholders in accordance with applicable United States securities laws and/or the rules and regulations of the exchange or system on which the Company's shares are traded or quoted, as the case may be.

COOPERATING WITH GOVERNMENT INVESTIGATIONS

Amryt will cooperate with all government investigations, inquiries, requests for information or facility visits, as appropriate. Employees should notify the General Counsel and Global Chief Compliance Officer if they are contacted by any government authority.

Employees may always report a concern or suspected violation of this Code or other Company policy via <https://amrytpharma.ethicspoint.com>. Telephone numbers for making reports are available on the website. Reports may be made anonymously.

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