



Global Code of Conduct

Approved November 9, 2017



Dear Colleagues:

At Novelion, we have an important mission – the development and commercialization of novel, life-altering therapeutics to treat debilitating, and often fatal, rare diseases. In working to achieve this goal, we share an equally important responsibility - ensuring that we each act with integrity and honesty, and with the highest standards of ethical behavior in all we do. Integrity, honesty and ethical behavior are fundamental to building a successful company. These traits help to define the character and culture of Novelion. Our actions, consistent with these principles, ultimately serves to inspire our shareholders, the healthcare community, and the patients who will benefit from our products to put their trust in us. Setting high standards for ourselves and each other is what it means to be a Novelion employee and part of the Novelion team.

This Code outlines our policies for ensuring that we conduct our business ethically, and observe applicable laws, rules and regulations. Each of you - our employees, directors and business partners - has a personal and professional responsibility for ensuring that your conduct is consistent with both the letter of this Code and its spirit of ethical behavior, and for helping us to foster a culture of compliance at Novelion. Your conduct impacts not just you, but also your colleagues and the company as a whole. Your adherence to these ethical principles is essential to our future success.

No Code of Conduct can provide definitive answers to all questions. We expect each of you to exercise reasonable judgment to determine whether a course of action is consistent with our policies and ethical standards. We expect you to seek guidance in cases where there is a question about the letter or spirit of our policies or as to how they apply to your activities. This Global Code of Conduct identifies the people who can answer questions you might have about compliance, and defines the process for addressing concerns and for reporting suspected misconduct.

Creating a strong culture based on integrity and ethical behavior requires the same high level of commitment, teamwork, leadership and dedication that we apply to our other fundamental endeavors. This Global Code of Conduct is an important part of our overall compliance efforts. Please give these principles and policies your thoughtful and frequent attention as you conduct business for Novelion. I am counting on you.

Sincerely,

Jason M. Aryeh
Chairman of the Board

INTRODUCTION

Compliance – Our Shared Responsibility

The Global Code of Conduct (“Code”) reflects Novilion’s commitment to act with integrity, honesty and high ethical standards in our daily business interactions.

Each of our employees, directors and business partners worldwide is expected to demonstrate these qualities in the way in which we conduct our business. This means that each of us must:

- Be familiar with and comply with this Code and the laws, policies, procedures and standards that apply to our activities.
- Ensure that employees who report to us understand their compliance responsibilities.
- Treat others with respect and dignity.
- Raise concerns if you believe someone is violating a law or policies.

Our managers serve as a role model for high ethical standards and create a culture of honesty and respect. We expect our managers to be a resource for employees and create an environment where employees are comfortable raising concerns. Our managers are expected to take opportunities to reinforce the importance of appropriate conduct with employees and to take reasonable actions to detect and prevent misconduct.

About the Code

This Code is not meant to describe every situation you may face, but rather sets forth the standards that all of us are expected to meet, and to point you in the right direction for more specific information when you need it.

Each of us is expected to be proactive in exercising our commitment to ethics and compliance in a way that will merit the continued trust and confidence of all our stakeholders. As each of us performs our daily business activities, it is important that we use common sense and good judgment to guide us in determining appropriate behavior. However, if you are unsure, you should seek guidance by consulting with your manager or other senior leadership.

For purposes of this Code, the term “Novilion” or the “Company” refers to Novilion Therapeutics Inc. and its subsidiaries worldwide.

Oversight and Implementation of the Code

This Code is an important component of Novilion’s broader compliance program. Other critical components of Novilion’s compliance program include:

- More detailed policies and procedures in key areas.

- Specific compliance training based on relevance of topic to employee’s business activities.
- Oversight by our Board of Directors, through its Audit Committee and Compliance Committee.
- Designation of a Chief Compliance Officer by the Board of Directors.
- Review and input on compliance issues, policies, and practices by an internal Compliance Committee.
- Auditing and monitoring.
- Avenues for reporting known or suspected misconduct or violations.

Communication of Code

All directors, officers and employees will be supplied with a copy of this Code upon the later of the adoption of the Code and beginning service with Novelion. Updates of the Code will be provided from time to time. A copy of this Code is also available to all directors, officers and employees by request made to Human Resources or the Legal Department or by accessing the Company’s website at www.Novelion.com. Those responsible for interactions with our business partners are responsible for communicating this Code to them as relevant to their activities for Novelion.

Administration of Code

If there is a conflict between this Code and Novelion’s more specific policies on a given topic, the more specific policy, as currently in effect, will govern.

Our Board of Directors, in conjunction with the Compliance Committee and Audit Committee of the Board, is responsible for administering the Code. The Board of Directors has delegated day-to-day responsibility for administering and interpreting the Code to Novelion’s Chief Compliance Officer.

RESPECT IN THE WORKPLACE

Novelion fosters a work environment in which people are treated with dignity and respect. Our work environment is characterized by mutual trust and the absence of intimidation, harassment, discrimination or abuse. We each play a role in creating a positive environment through our own example, and as leaders and managers.

It is Novelion’s policy to provide equal employment opportunities in all aspects of employment and to follow the employment-related laws in the countries in which we do business.

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

Key Reminders:

- Do not make offensive, hostile or derogatory comments or jokes. Support an atmosphere where these kinds of comments and jokes are not tolerated.
- Do not create, send or display any offensive, illegal or defamatory pictures, e-mails or other materials at Novelion or using Novelion's systems or hardware.
- Do not make any verbal comments or engage in physical conduct or other behavior designed to threaten or intimidate another person.
- Do not make unsolicited and unwelcome sexual advances, or other unwelcome or offensive verbal comments or physical conduct of a sexual nature with another employee or with anyone else in the context of work activities.

Safety in the Workplace.

Novelion is committed to a workplace free of any threats to health or safety, including health and safety issues associated with substance and alcohol abuse. Each person should follow health and safety laws, rules and practices applicable to your activities for Novelion, 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 Novelion facility.

Novelion employees should not:

- Work under the influence of alcohol or possess or consume alcohol on Novelion premises or at Novelion events, except at a Company-sponsored event at which alcohol is provided by Novelion. Employees who choose to drink at these events are expected to behave safely and responsibly, and not to drive to or from Novelion's offices or events if impaired.
- Use, possess, or distribute illegal drugs, or permit this activity, while working for Novelion or on Novelion premises or at a Novelion-sponsored event.
- Bring weapons to Novelion's premises or to a Novelion-sponsored event.

CONFLICTS OF INTERESTS

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

A "conflict of interest" occurs when your personal, financial or other outside interests interfere with Novelion's interests. Even the appearance of a conflict of interest can damage your reputation or that of Novelion. We are each responsible for identifying situations where a conflict of interest may exist, and disclosing the actual or potential conflict.

Examples of situations that might be a conflict of interest:

- Outside engagement or employment
- Community or advocacy service, e.g. serving as a board member for an organization that receives funds from Novelion
- Gifts or entertainment from vendors- Generally Novelion employees are discouraged from accepting gifts or entertainment from vendors; questions should be directed to Compliance or Legal
- Business on behalf of Novelion with a company in which you or your relatives have an interest

If you are unsure about any situation that might be a conflict of interest, you should contact the Legal or Compliance Department for guidance.

USE OF COMPANY ASSETS

Novelion’s “systems and hardware” include computers, laptops, tablets, phones, e-mail, voice-mail, drives, internet access and other systems and hardware provided or subsidized by Novelion. Novelion systems and hardware, the records and information stored on them and all records related to use of those systems are the property of Novelion, and should generally only be used for company business. Incidental personal use is permitted provided it does not violate any laws or Novelion policies, and does not interfere with job performance. The use of non-Novelion systems or hardware for company business is prohibited.

Generally, you should not expect any rights of personal confidentiality or privacy when using Novelion’s systems and hardware, although local laws in some countries may give employees in those countries greater rights. Where legally permitted to do so, Novelion may, in its sole discretion, inspect your files, records, e-mails, text messages, voice-mail messages and telephone records on Novelion’s systems and hardware, and may monitor your internet use at any time without advance notice or your consent.

Key Reminders:

- Comply with Novelion information security policies. Do not allow third parties to use Novelion systems or hardware unless appropriate internal approvals have been obtained.
- Do not covertly videotape or record audio of any person in any work-related interactions without specific authorization from the Legal Department.
- When your employment ends, return to Novelion all Novelion property and equipment, including all hardware and all information and records in your possession, including any files on your personal drives created in your business activities for Novelion.

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

Each of us plays a significant role in safeguarding Novelon confidential information. Our confidential information should not be provided to, or discussed with, anyone outside the company unless the disclosure has been approved through the appropriate internal approval procedures.

Examples of confidential information includes information related to our products; customers; marketing plans; sales activities, financial results; pricing practices; clinical trial results; business development opportunities; manufacturing process; regulatory filings; and employee records. If you possess confidential information of our vendors, customers, or business partners or any other third party with whom we are doing business or proposing to do business, treat that information the same way that you would Novelon confidential information.

Non-Disclosure Agreements: It is each employee's responsibility to confirm that a written nondisclosure agreement, in a form approved by the Legal Department, is in place prior to disclosing any Novelon confidential information to a third party. Novelon employees should not sign a confidentiality agreement provided by another company without the approval of the Legal Department.

BUSINESS RECORDS

Novelon is committed to maintaining accurate business records in an appropriate manner.

Examples of appropriate records management:

- Do not falsify any business record, e.g., hard and electronic copies of documents, e-mails, texts, voice- mails, notes, audio and visual recordings, and photographs.
- Never create, alter or destroy records or documents to impede a potential or actual investigation.
- Retain all business records for the time needed as required by law or Novelon policy.
- Do not alter or destroy any business records if you are aware of a potential or actual legal action or investigation to which records may be relevant.

In the course of conducting business, Novelon may adopt record management policies that would be designed to ensure that we adequately maintain and archive our business records.

Key Reminder:

- If you receive a "hold order" from the Legal Department or Novelon's outside counsel, do not destroy any records, information or data that you are required to retain.

OUR INTERACTIONS IN THE MARKETPLACE

Product Information and Promotion. The integrity of our interactions with patients, physicians, payers and the broader healthcare community are crucial, not just to our reputation and business, but also to the health and well-being of patients who are intended to benefit from our products.

Many laws and regulations govern these activities, and the way in which we promote our products. While laws and regulations differ country to country, Novilion is committed to ensuring that our promotional and scientific discussions, information and materials is accurate and not misleading, and complies with local laws and regulations.

Key Reminders:

Promotion

- Promote Novilion products only in any country where the product has been approved by the relevant regulatory authority in that country.
- Promote Novilion products only for the specific uses approved by the relevant regulatory agency in that country.
- Provide fair balance between risks and benefits.
- Use only promotional messages, materials and other product information that have been approved for the intended use through Novilion’s promotional review procedures.
- Only those with appropriate internal authority should set price or agree on any other terms of sale for our products.

Scientific Exchange

- Address the scientific needs of the healthcare community by providing accurate and balanced medical, scientific, and technical information about Novilion products and the diseases treated by those products.
- Use messages, materials and other product information that have been approved for the intended use through Novilion’s scientific review procedures.
- Respond to unsolicited requests for information with a narrowly tailored response.
- Ensure communications are void of promotional content, claims, tone or language.

Our Code reflects Novilion’s commitment to honor healthcare professionals’ professional independence, avoid improper inducements in any form, and to follow the applicable laws, industry codes and guidelines that govern these relationships. Our interactions should be focused on informing healthcare professionals about the benefits and risks of Novilion products and providing and obtaining scientific and educational information.

In our globalized marketplace, the laws and standards of many countries must be considered when undertaking interactions with HCPs. If more than one code or law is applicable, the stricter code will apply.

As part of our day-to-day activities, Novelson engages with healthcare professionals in direct and indirect interactions, including:

- Promotion of Novelson products
- Business relationships with healthcare professionals, including use as Consultants and Speakers
- Research Grants, e.g., Investigator Initiated Studies
- Scientific Exchange
- Business Meals
- Market Research
- Efforts to obtain market authorization and/or reimbursement for Novelson products

Key Reminders:

- We must never offer or promise anything of value to a healthcare professional to induce or reward a decision to purchase, prescribe, recommend or reimburse any of our products.
- Where allowed by local laws or industry codes, Novelson may provide, on an occasional basis:
 - ✓ Inexpensive educational items for the benefit of healthcare professionals and patients, e.g. anatomical model
 - ✓ Modest business meals in conjunction with a business discussion
- All payments to a physician for services, e.g., consulting or speaking, must be made only for a legitimate business need, paid at fair market value, and detailed a written agreement approved in advance by the Legal Department.
- Novelson may support educational programs, research initiatives or patient initiatives as grants; these must be approved through Novelson’s grant review procedures, and must not be provided as an inducement or reward for prescriptions.

HCPs: The term “healthcare professionals” includes doctors, nurses, pharmacies, formulary or benefit administrators, and any other healthcare professional who may prescribe, administer, recommend, purchase, reimburse, authorize or supply one of our products.

A Word about Industry Codes:

In addition to local country-specific industry codes, there are global and regional industry codes that may apply to our commercial activities and to certain activities prior to approval. Examples include:

- The IFPMA Code of Pharmaceutical Marketing Practices -Global
- The PhRMA Code on Interactions with Healthcare Professionals- U.S.
- The EFPIA Code on the Promotion of Prescription-Only Medicines to, and Interactions with, Healthcare Professionals - EU

Novelion has a responsibility to ensure that its employees are aware of relevant local laws and industry codes specific to the employees' regions. Novelion employees are responsible for knowing and following the rules and standards based on local laws or industry codes. Please contact your local Compliance or Legal contact if you have any questions about your region's codes or laws.

Transparency and Disclosure Laws:

Novelion is committed to tracking and reporting payments and other transfers of value provided to HCPs as required by EFPIA Disclosure Code, U.S. Open Payments Program (often referred to as the "Sunshine Act") and certain state and international laws.

While the specific reportable items vary by country, laws frequently require reporting of items of value such as food, consulting fees, speaker fees, travel, lodging and grants.

Each Novelion employee who interacts with or engage HCPs is responsible to ensure that any compensation, travel, meals or other items provided to the HCP, whether directly or through a vendor, are recorded in the appropriate system to allow for transparency reporting.

MONITORING AND DRUG SAFETY AND QUALITY

Novelion is committed to understanding the safety profile of each of our products through the collection, review and analysis of reports of adverse events associated with the use of our products and other quality information. An adverse event is any unfavorable medical occurrence or event 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 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. Collection and reporting of adverse events is required under laws and regulations worldwide, but also help us to understand more about the safety of our products.

Novelion employees who become aware of any adverse events or product quality complaint involving a Novelion product or product candidate should report the event to the drug safety department within one business day of becoming aware of the event or complaint.

CLINICAL RESEARCH

Novelion is committed to the highest ethical, scientific and clinical standards in the conduct of our clinical trials, and in the reporting of clinical trial results. We comply with all applicable laws, regulations and industry standards, including *the International Conference on the Harmonisation Good Clinical Practice Guidelines* (ICH GCP). Our policies and procedures are based on our respect for the well-being and safety of research participants, and the accurate reporting of results.

Key Reminders:

- Follow all required internal and external approval procedures before initiating a clinical study.
- Ensure that an informed consent is obtained from each study subject in a form that has been reviewed and approved in accordance with applicable Novellion review processes, and conforms to applicable laws and regulations.
- Comply with ICH GCP and other applicable laws, regulations and industry standards in the conduct of each clinical study, and in the collection, analysis and reporting of results.
- Comply with all privacy policies and procedures and all applicable laws and regulations when collecting, accessing, using or disclosing personal health information.
- Maintain ethical standards, and the fundamental tenets of accuracy and truthfulness in the collection, analysis and reporting of results of clinical studies.

PRIVACY

In our business activities, we may collect certain personal information about many different types of individuals, including our employees, patients, healthcare professionals and business partners. Some of the information collected in research, pharmacovigilance, customer support, sales activities and other business activities may constitute personal health information.

What is Personal Information?

“Personal Information” is generally defined as 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. Novellion employees and business partners should be familiar with the privacy laws that apply in the country in which they operate.

Novellion is committed to taking appropriate action to ensure the privacy of personal information, and to ensure that the information is used solely as authorized and in accordance with all applicable laws and regulations. Personnel should:

- Collect personal information only where there is a legitimate business need and where permitted by local laws and regulations
- Obtain consent for the collection and use of personal information, as required
- Take precautions to safeguard personal information
- Share personal information only as permitted and only with those persons who have a legitimate need for the information

ANTI-BRIBERY AND ANTI-CORRUPTION LAWS

Many countries in which Novelion conducts business have laws that prohibit the offering, promising or providing of anything of value to certain persons with the intent to improperly influence the person or to gain an unfair business advantage. In most countries, these laws are specific to interacting with government officials.

For example, in the U.S., the Foreign Corrupt Practices Act (FCPA) makes it illegal for employees of U.S. companies to directly or indirectly give anything of value to a non-U.S. government official to gain an improper business advantage. In some countries, however, the laws apply to a broader set of activities. For example, the UK Bribery Act prohibits the offering of bribes to anyone, including both private citizens and public officials.

These prohibitions generally apply not just to direct interactions, but also to payments or promises made through third parties, including distributors, vendors or consultants. Novelion is committed to complying with the FCPA and other applicable anti-bribery laws and to ensure that our vendors do the same in the conduct of our business. Novelion will not tolerate attempts to improperly influence public or private individuals to secure a favorable advantage to Novelion's interests.

Key Reminders:

- Do not, directly or indirectly, make, offer or promise anything of value, including money, gifts, employment, or free or discounted services that is intended to improperly influence the actions of a government official or any other person
- Watch for "red flags" that any third party acting on our behalf may be violating our policies in this area.

GLOBAL TRADE, IMPORT AND EXPORT CONTROLS AND EMBARGO REGULATIONS

Many countries have laws that govern the import, export or transfer of products, technology, information and services into and out of the country. In some countries, such as in the U.S., these laws include embargoes, economic sanctions and other trade restrictions against other countries that may prevent us from doing business in a certain country, or may limit, or impose requirements on, how we do business in certain countries.

U.S. export control laws also contain provisions generally prohibiting U.S. companies and their subsidiaries and certain affiliates worldwide from cooperating in boycotts that the U.S. does not support, such as the Arab-League boycott of Israel. Employees involved in activities involving export and import activities should be familiar and comply with the Novelion procedures and local

laws and regulations for export and import activities. If you have any questions as to whether your proposed activities, relationships or agreements are appropriate, contact the Legal Department.

ANTI-TRUST LAWS AND UNFAIR COMPETITION

Novelion 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. These laws 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.

To ensure that we comply with these laws, and to avoid even the appearance of collusion with a competitor:

- Do not engage in discussions, or enter into oral or written agreements, with an existing or potential competitor about price; discounting policies; division of territories; markets or customers; or any other terms of sale.
- Do not bribe or attempt to bribe any existing or potential customer, supplier or payer to help Novelion's business or to hurt a competitor's business.
- If you would like to engage with competitors as part of industry-wide lobbying efforts, consult with the Legal Department to understand what discussions and activities are permitted.

Business Intelligence:

Business intelligence about other companies, if collected by lawful and ethical means, may be a valuable source of information. We expect that each of our employees and any vendors we engage will only use ethical and legal means to gather business intelligence.

Key Reminders:

- Never use, or ask a third party to use, unlawful or unethical means to obtain business intelligence. Examples of unethical means include any form of misrepresentation, deception, theft, spying, bribery or encouraging or soliciting breach of a confidentiality obligation to gather competitive intelligence.
- Do not request or receive confidential information of another company from its current or former employees or vendors.
- Do not use or disclose to any Novelion employee or vendor any confidential information you learned while employed by another company.

Fair Dealing:

Competing vigorously, yet lawfully, with competitors and establishing advantageous, but fair, business relationships with customers and suppliers are a part of the foundation for our long-term success. However, unlawful and unethical conduct, including misrepresentation of facts, which may lead to short-term gains, may damage our reputation and long-term business prospects.

OUR SHAREHOLDERS AND THE INVESTMENT COMMUNITY

Insider Trading:

Insider trading laws generally make it illegal for a person to buy or sell stock or other securities of a company while in possession of material, non-public information related to the company. Insider trading laws also typically make it illegal for a person to share material, non-public information about the company with others who may trade on that information or to make recommendations on trading while in possession of material non-public information. (This is referred to as “tipping”).

These illegal activities are referred to as “insider trading.” Insider trading laws apply not only to trading in Novilion stock while in the possession of material, non-public information about Novilion, but also to trading in the stock of any of our vendors, customers or other business partners while in the possession of material, non-public information about the other company that you learn through your business activities at Novilion.

What is Material, Non-Public Information?

Information is typically considered to be “material” if a reasonable investor would consider the information important in deciding whether to buy or sell shares or other securities, or if its disclosure would reasonably be expected to affect the market price of the Company’s stock. Examples may include: financial results; results of clinical trials; key decisions of regulatory authorities; major changes in financial guidances; key business development deals; a possible merger or acquisition; major litigation; or other major developments affecting our business. Information is generally considered to be “non-public” until the information has been disclosed in a Novilion press release or has been disclosed during a webcasted Novilion investor conference call.

Trading Activity / Do and Don’ts:

- Do not trade, or have others trade for you, in the stock or other securities of Novilion, including the sale of shares acquired through the exercise of stock options, when in the possession of material, non-public information about Novilion unless such trading occurs pursuant to a 10b5-1 trading plan that meets the requirements of Novilion’s policies and procedures, and has been approved by the Legal Department.

- Do not trade (or have others trade for you) in the stock of any other company when in the possession of material, non-public information about that company learned through your Novelion related activities.
- Do not disclose material, non-public information about Novelion or any other company to anyone else with the intent, expectation or suggestion that they trade in the securities of the company while aware of such information.
- Do not give trading advice of any kind about Novelion or any other company when you are in the possession of material, nonpublic information about the company, except when appropriate, to advise others not to trade if doing so might violate the law or Novelion's insider trading policies.
- Do not engage in short-term or speculative transactions in Novelion stock, such as short sales, puts, calls, hedging transactions, margin accounts or pledges.
- Follow trading approval procedures established by Novelion.

These prohibitions apply to all our directors, officers and employees, and to those consultants or contractors who have access to material non-public information about Novelion, and to spouses, significant others, children, parents or other family members of such person who live in the same household.

FINANCIAL INTEGRITY

Accurate Books and Records:

Novelion is committed to providing its shareholders with fair, complete and accurate information about our financial condition and results of operations as required by applicable securities laws. All employees play a role in ensuring that our books, records, financial statements and disclosures fully and accurately reflect our business and results.

Key Reminders:

- Create business records and financial statements that accurately reflect the truth of the underlying transaction or event.
- Only sign or approve financial transactions, financial statements, reports or records, if you are authorized to do so, and you believe they are truthful and accurate.
- Provide timely and candid forecasts and assessments to management, without omitting or misrepresenting relevant information.
- Cooperate fully and honestly with Novelion's independent public accountants.

COMMUNICATIONS WITH INVESTORS AND MEDIA

As a publicly-traded company, Novelion has a responsibility to properly manage the flow of information to its investors, the investment community, the media and the public in a way that

ensures the information is accurate, and is disclosed in a manner that is consistent with applicable laws and regulations. Only designated members of senior management and or other authorized employees in the Investor Relations or Corporate Communications functions are authorized to speak to investors, financial analysts, reporters and other members of the media.

Who Speaks for Novelion to Investors and the Media?

- Do not speak to an investor, financial analyst, the media or anyone acting in a similar capacity about Novelion, or respond to an inquiry about Novelion from any such person unless you are authorized to do so by the CEO, the CFO or the head of Investor Relations or Corporate Communications. Refer all inquiries to Investor Relations or Corporate Communications.
- Do not respond or participate in discussions about Novelion or its products or therapeutic areas of focus on social networking sites, chat rooms or message boards or other social media forums unless authorized to do so by the CEO, the CFO or the head of Investor Relations or Corporate Communications.

GOVERNMENT INVESTIGATIONS

Novelion's activities are regulated by numerous different governmental agencies worldwide. As a result, we expect that we will, from time to time, receive requests for information from these governmental agencies, and that our facilities will be subject to governmental inspections. Novelion has a responsibility to cooperate with government authorities with requests for information, facility visits and inspections.

To Ensure We Meet Our Obligations:

- Notify the Legal Department immediately of any government complaint, investigation, subpoena, claim of non-compliance, notice of inspection, or non-routine request for information, and follow all other internal notification procedures applicable to your functional area.
- Cooperate fully with all investigations and audits, and tell the truth. When responding, do not provide misleading information or omit information that has been requested or where the omission would make the statements that are provided misleading. Do not guess or make up a response in providing information to the government.
- Do not alter or destroy documents or records in response to an investigation or audit or when an investigation or audit is anticipated.
- Work with the Legal Department to respond appropriately to requests for information in connection with litigation or requests from the government or other external agencies.
- Do not discuss an investigation, internally or externally, unless instructed to do so by senior management, the Legal Department or the government investigators.

POLITICAL ACTIVITIES AND CONTRIBUTIONS

There are numerous laws worldwide that regulate a company's ability to make political contributions and to engage in political activities, including lobbying. All political contributions proposed to be made with Novelion's funds, and all lobbying activities on Novelion's behalf, must be coordinated through and approved by the Legal Department or approved through other procedures as are adopted from time to time by Novelion.

Key Reminders:

- Do not use Novelion funds for contributions of any kind to any candidate for political office or to a holder of any national, state or local government office, without the approval of the Legal Department
- Do not represent any personal political contribution made by you as having been made on Novelion's behalf. Do not seek reimbursement from Novelion for any personal political donation.
- Do not engage in lobbying or other political activities on behalf of Novelion without the approval of the Legal Department except as approved in accordance with other procedures adopted by Novelion.
- If you are involved with lobbying or other political activities on behalf of Novelion, ensure that you have reviewed and comply with Novelion's anti-corruption and anti-bribery policies,

THE ENVIRONMENT

Respecting the Environment

Novelion is committed to complying with all applicable laws and regulations related to the environment. We endeavor to operate our facilities in an environmentally responsible way.

SEEKING GUIDANCE AND REPORTING CONCERNS

Monitoring Compliance and Disciplinary Action

Novelion's management, under the supervision of its Compliance Committee and Audit Committee, will take reasonable steps from time to time: (i) to monitor compliance with this Code, and (ii) when appropriate, to impose and enforce appropriate disciplinary measures for violations of this Code.

Novelion's management will periodically report to the Compliance Committee and Audit Committee on these compliance efforts including, periodic reporting of alleged violations of the Code and the actions taken.

Anyone who violates the law, our Code, or other Novelion policies may be disciplined, including termination of employment and/or his or her business relationship with Novelion, in accordance with international, federal, state, and local law.

Seeking Guidance and Reporting Concerns

Each employee is encouraged to proactively ask questions and seek guidance when unsure about proposed activities. The best starting point will often be your manager.

If we witness or suspect a violation of our Code, Novelion policies, or the law, we are each responsible for promptly reporting it to our managers, the Chief Compliance Officer, the Chairman of the Board Compliance Committee, or other senior leadership either directly or via our Compliance and Ethics Helpline. Failure to report a violation is itself a violation of this Code.

Novelion has established a confidential outside resource made available to us 24 hours, 7 days a week to report concerns and potential violations of the Code, our policies and applicable laws and regulations. Calls and reports to the Compliance and Ethics Helpline may be made confidentially. Each of us is responsible for using this, or other reporting channels, in good faith and in a truthful and reasonable manner.

In writing (anonymity available)	Chief Compliance Officer Novelion Therapeutics Inc. 887 Great Northern Way, Suite 250 Vancouver, British Columbia, Canada V5T 4T5
By web reporting (anonymity available)	https://novelioncompliance.tnwreports.com
By phone (anonymity available)	855-233-8089 (domestic line) A third-party vendor is available 24/7/365

Anonymity

Although calls and reports to the Compliance and Ethics Helpline or mail may be made confidentially and anonymously (where allowed by local law), we encourage reporters to identify themselves when making a report. This helps to facilitate a more complete, thoughtful, and appropriate investigation. We will use reasonable efforts to protect the confidentiality of the reporting person, subject to relevant law, rule or regulation or to any applicable legal proceedings.

Reporting to Government

Nothing in this Code is intended to prohibit an employee from reporting any suspicion of violation of law to any federal or state governmental agency, or from participating in any governmental investigation or procedures.

Responding to Concerns and Issues

Novelion is committed to investigating and responding to reported concerns and issues in a timely and appropriate manner. Personnel are expected to cooperate in any investigation of a potential violation. Failure to cooperate in a Novelion investigation is itself a violation of this Code.

No Retaliation

Novelion expressly forbids retaliation against any person who, acting in good faith, reports suspected misconduct, whether or not the misconduct is confirmed by a subsequent investigation. Novelion considers retaliation itself a violation of this Code and will respond accordingly.

Waivers and Amendments

No waiver of any provisions of this Code for the benefit of a director or an executive officer (which includes without limitation, for purposes of this Code, the Company's principal executive, financial and accounting officers) will be effective unless (i) approved by the Board of Directors or, if permitted, a committee of the Board, and (ii) if applicable, such waiver is promptly disclosed to the Company's stockholders in accordance with applicable securities laws and/or the rules and regulations of the exchange or system on which our shares are traded or quoted, as the case may be.

Any waivers of the Code for other employees may be made by the Chief Compliance Officer, the Board of Directors or, if permitted, a committee of the Board.

Novelion reserves the right to modify any aspect of its compliance program, including this Code of Business Conduct and Novelion's other policies, 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, if applicable, must be promptly disclosed to the Company's shareholders 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.