

SPECTRUM

VENDOR CODE OF CONDUCT AND ETHICS



TABLE OF CONTENTS

- **OVERVIEW ----- 4-8**
 - » Letter from the CEO
 - » Purpose, Severability and Company Information
 - » Spectrum’s Foundation
 - » Background
 - » Due Diligence Screening
- **ETHICS ----- 9**
 - » Transparency and Disclosure of Information
 - » Anti-Bribery and Anti-Corruption
 - » Protection of Intellectual Property and Confidential Information
- **MANAGEMENT ACCOUNTABILITY ----- 10**
 - » Management Accountability and Responsibility
 - » Management Systems and Governance
 - » Conflicts on Interest
 - » Insider Trading
 - » Press
- **COMPLIANCE ----- 11-12**
 - » Risk Assessment and Management
 - » Audits and Assessments
 - » Documentation and Records
 - » Training and Communication
 - » Corrective Action Process
 - » Grievance Mechanism and Whistleblower Protection
 - » Privacy and Data Protection
- **HUMAN RIGHTS ----- 13**
 - » Anti-Discrimination
 - » Anti-Harassment and Abuse
 - » Prevention of Involuntary Labor and Human Trafficking



TABLE OF CONTENTS

- **LABOR-----14**
 - » Working Hours
 - » Wages and Benefits
 - » Performance Objectives with Implementation Plans and Measures
 - » Vendor Diversity and Inclusion
- **HEALTH AND SAFETY-----15**
 - » Health and Safety Training and Communication
 - » Occupational Health, Safety and Hazard Prevention
 - » Emergency Prevention, Preparedness and Response
 - » Incident Management
- **ENVIRONMENT -----16-17**
 - » Environmental Laws, Permits and Registrations
 - » Material Restrictions and Handling
 - » Pollution Prevention and Resource Reduction
 - » Waste Management Training
 - » Water
 - » Air
 - » Transporters and Haulers of Waste
 - » Hazardous Substance Management and Restriction
 - » Non-Hazardous Waste Management



LETTER FROM THE CEO

Dear Vendor,

It is with great pride and pleasure that I welcome you to partnering with Spectrum! Together, we do the work it takes to serve our patients, customers, and shareholders who all deserve our best. Each day you now have the opportunity to contribute to the noble cause of improving the lives of others. Spectrum is focused on the development and commercialization of innovative therapies within the realm of cancer, which has so many unmet needs. Cancer touches everyone. You now have the chance to affect the lives of many. Embrace that! Innovation comes from our people, both employees and partners, which leads to advancements and treatments that will help mankind. Your passion and collaborative efforts will lead to Spectrum's continued success. I encourage you to approach this partnership with pride and choose to be excellent at all that you do every day. Be accountable for and own your work. Never accept mediocrity in what you do. The outcome of your work is so important to others. Remember, our success is the sum of the work of all employees and partners together. What we do matters!

As employees and partners strive to meet Spectrum's goals, we must do so with the highest ethical standards of compliance with all applicable laws, rules and regulations. Honest, ethical and professional conduct remains fundamental to achieving the highest goals set for Spectrum.

We will advise you of significant changes to this Code when they occur. Spectrum is built on its people, both employees and partners, and we rely on you to consistently deliver the highest levels of productivity. I encourage you to speak with your Spectrum relationship manager about any questions, comments or concerns you have regarding this Code, or about your engagement in general. We encourage you to bring your questions, suggestions and complaints to our attention. Careful consideration will be given to each of these in our continuing effort to improve operations at Spectrum.

Welcome to your partnership with Spectrum!

A handwritten signature in black ink, appearing to read 'Joe Turgeon'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Joseph W. Turgeon
President and Chief Executive Officer



PURPOSE, SERVABILITY AND COMPANY INFORMATION

OVERVIEW

Spectrum Pharmaceuticals, Inc. (the “Company”) has adopted this Vendor Code of Business Conduct and Ethics (the “Code”) to acquaint Vendors with the Company and to provide a ready reference to answer most questions regarding expectations of conduct. This Code should not be considered all-inclusive, but rather a set of guidelines.

This Code should be kept throughout the duration of the goods or service engagement or until a new Code is provided. This Code can be changed by the Company at any time but can only be changed in writing by the CEO of the Company. Regardless of the date of engagement, Vendors are subject to any amendments, deletions, and changes to the Code.

This Code should not be construed as creating any kind of “Vendor contract”.

If any applicable laws have changed since the writing of this Code, and if any portion of this Code is determined to be unlawful or unenforceable because of such change or for any other reason, it shall not mean that the entire Code or any other provision in it is invalid.

Company Headquarters:

11500 Eastern Ave. Suite 240, Henderson NV, 89052

Company Website: www.sppirx.com

Company Intranet Site: <http://mySpectrum/>

Important Phone Numbers:

Corporate Office - Nevada: (702) 835-6300

Fax: (702) 260-7405

Anonymous Compliance Helpline: (844) 587-1660

As of the effective date this Code the following persons held corresponding positions set forth below. These positions are identified as they are referenced within the contents of the Code. Positions and Employees may change at any time, as needed.

President and Chief Executive Officer: Joseph W. Turgeon

Chief Operating Officer: Thomas J. Riga

Chief Compliance Officer: compliance@sppirx.com

Chief Information Officer: IT@sppirx.com

Human Resources/Benefit Coordinator:
humanresources@sppirx.com

Payroll Administrator: payroll@sppirx.com

Legal Department: legal@sppirx.com

Safety Manager: facilities@sppirx.com



SPECTRUM'S FOUNDATION

OVERVIEW

Spectrum's foundation is built on strong ethical principles and values which reflect our commitment to conducting business with honesty, fairness and integrity; whereby we avoid doing anything that could even suggest impropriety in any of our dealings.

MISSION:

At Spectrum Pharmaceuticals Inc., we bring the expertise and passion for excellence of our team to acquire, develop and commercialize novel and targeted pharmaceuticals for unmet medical needs while building value for our shareholders.

VALUES:

Small Company Spirit, Patient Focus, People, Integrity and Quality.

COMMITMENT TO EXCELLENCE:

Each of us is committed to excellence in everything we do. We know that each of us has the power to make a difference at our Company every day. Each and every one of us brings a unique skill and voice that is critical to the success of our Company. Understanding this, we strive every day to help our Company achieve this mission.

CORE PRINCIPLES:

Spectrum abides by the following core principles:

1. We will use all lawful and ethical means possible to bring our therapy options to the right patients, in the right way.
2. We will be personally responsible to understand and adhere to the letter and spirit of all laws and company policies that pertain to our daily business.
3. We will partner only with healthcare professionals, suppliers and other business partners who share our commitment to understand and uphold the laws and regulations that apply to our operations.
4. We will respect and protect the dignity and privacy of patients, healthcare professionals and their staff, business partners, competitors and our fellow employees.
5. We will promptly and cooperatively report without fear of retaliation any behavior contrary to these principles to management, the Compliance Department or the Compliance Helpline.



BACKGROUND

OVERVIEW

Spectrum defines “Vendor” (aka Third Party) as any individual that is not employed by Spectrum or its affiliated entities, or an entity that is not majority owned by Spectrum or its affiliated entities.

The Spectrum Vendor Code of Business Conduct and Ethics (the Code) describes Spectrum’s preferences with respect to Vendor conduct. Spectrum prefers for Vendors to act in accordance with the Code, including aligning guidelines, policies and practices, and communicating and enforcing the Code provisions throughout their organization and across their supply chain, including to sub-vendors and sub-contractors.

Spectrum strives to work with Vendors that: 1) act with integrity and demonstrate a commitment to legal, ethical, safe, fair and environmentally responsible business practices and 2) operate in compliance with all applicable laws, rules and regulations within the geographies in which they operate.

Spectrum does not condition Vendor goods and service engagements upon any explicit or implicit agreement or understanding to use, purchase, order, refer, recommend, arrange, prescribe, provide formulary status for, or dispense any Spectrum product. Vendor goods and service engagements may never be used to reward past purchases or recommendations or encourage the potential for future purchases or recommendations to use Spectrum products.

In instances where standards outlined in the Code differ from local laws, Spectrum prefers Vendors should respect these standards within the framework of the applicable local laws. Spectrum prefers Vendors that are open and cooperative with the regulators and comply with the global and local jurisdictional requirements.

This Code sets forth Spectrum’s preferences for current and future vendors. Spectrum prefers all new and existing vendors to aspire to make continuous improvements to their businesses as noted herein across ethical, human and labor rights, vendor diversity and inclusion, and environmental areas.



DUE DILIGENCE SCREENING

OVERVIEW

Spectrum makes a conscious and concerted effort to only contract with Vendors that conduct business with the highest ethical standards and maintain compliance with all applicable laws, rules and regulations. Each proposed Vendor undergoes a rigorous due diligence screening prior to being offered a contract.

Only entities that are in good standing and have not, for example, been excluded, debarred, or otherwise sanctioned by federal, state, or local law enforcement, regulatory, licensing, or medical review agencies or boards, are eligible for engagement for bona fide services. Spectrum will not knowingly contract with or conduct business with a Debarred/Excluded Person or any other entity that is not in good standing.

Spectrum prefers for Vendors to immediately self-disclose any information that might preclude their involvement in Spectrum business operations. This includes restrictions preventing their involvement in federal government programs or government contracts, debarment, exclusion, sanction, suspension or other events that makes a Debarred/Excluded Person or makes a Vendor otherwise not in good standing.

All Spectrum contracts entered into with a Vendor require the Vendor to disclose, immediately, any debarment, exclusion, suspension or other event that makes the Vendor a Debarred/Excluded Person or makes a Vendor otherwise not in good standing.

If Spectrum is notified or otherwise informed that an existing Vendor (contracted) is a Debarred/Excluded Person or a Vendor otherwise not in good standing, Spectrum shall terminate the engagement.



OVERVIEW

Spectrum expects the highest standards of ethical conduct in all our endeavors, including work conducted by employees and Vendors alike.

Spectrum prefers to work with Vendors that conduct business with the highest ethical standards and in compliance with all applicable laws, rules and regulations.

ETHICS

SPECTRUM PREFERS TO WORK WITH VENDORS WHO STRIVE TO:

Transparency and Disclosure of Information

- Record and report all business information honestly, accurately and without falsification or misrepresentation.
- Create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements.
- Be honest, direct and truthful in discussions with regulatory agency representatives and government officials.

Anti-Bribery and Anti-Corruption

- Comply with all applicable anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.
- Not directly or indirectly give, offer or accept anything of value to obtain or retain business or favored treatment, to influence actions or to obtain an improper advantage for Spectrum, itself, or any third-party.

Protection of Intellectual Property and Confidential Information

- Respect Spectrum's intellectual property rights and safeguard confidential information.
- Manage technology and know-how in a manner that protects intellectual property rights.



OVERVIEW

Spectrum is committed to holding both employees and Vendors accountable to their actions.

Spectrum prefers to work with Vendors that implement or maintain, as applicable, a management system that facilitates compliance the law, identification and mitigation of related operational risks and facilitates continuous improvement.

MANAGEMENT ACCOUNTABILITY

SPECTRUM PREFERS TO WORK WITH VENDORS WHO STRIVE TO:

Management Accountability and Responsibility

- Identify company representatives responsible for ensuring implementation and periodic review of its management systems.

Management Systems and Governance

- Institute effective management systems that utilize the best available techniques and practices to continuously improve performance.

Conflicts of Interest

- Avoid the appearance of or actual improprieties or conflicts of interest.

Insider Trading

- Avoid insider trading by not buying or selling Spectrum or another company's securities when in possession of information about Spectrum or another company that is not available to the investing public and that could influence an investor's decision to buy or sell the security.

Press

- Not communicate to the press on behalf of Spectrum unless expressly authorized in writing to do so by Spectrum.



OVERVIEW

Spectrum is committed to maintaining a Compliance & Ethics Program that abides by the Office of the Inspector General's (OIG) Compliance Program Guidance for Pharmaceutical Manufacturers to promote the prevention, detection and resolution of problems.

Spectrum prefers to work with Vendors that maintain a Compliance & Ethics Program that abides by the OIG guidance.

COMPLIANCE

SPECTRUM PREFERS TO WORK WITH VENDORS WHO STRIVE TO:

Risk Assessment and Management

- Develop and maintain a process to identify risks associated with its operations;
- Determine the relative significance of each risk; and
- Implement appropriate procedures and controls to control the identified risks.

Audits and Assessments

- Perform periodic evaluations of its facilities and operations, and the facilitations and operations of its subcontractors and net-tier suppliers to ensure compliance with this Code and the law.
- Permit Spectrum and/or a third-party designated by Spectrum to periodically evaluate vendors' facilities and operations, and those of its subcontractors and net-tier suppliers, to the extent they are providing goods or services to Spectrum, for Spectrum's benefit, or for the use in Spectrum's products

Documentation and Records

- Maintain processes to identify, understand and implement applicable laws and regulations and requirements of this Code.
- Maintain documents and records to ensure regulatory compliance.

Training and Communication

- Develop and maintain management and worker training programs to facilitate proper implementation of its policies and procedures and to fulfill vendors' continuous improvement objectives.
- Maintain a process for communicating clear and accurate information about its performance, practices, policies and expectations to its workers, next-tier suppliers and customers.
- Maintain an ongoing process to obtain feedback on its practices related to this Code and to foster continuous improvement



OVERVIEW

Spectrum is committed to maintaining a Compliance & Ethics Program that abides by the Office of the Inspector General's (OIG) Compliance Program Guidance for Pharmaceutical Manufacturers to promote the prevention, detection and resolution of problems.

Spectrum prefers to work with Vendors that maintain a Compliance & Ethics Program that abides by the OIG guidance.

COMPLIANCE (CONT'D)

Corrective Action Process

- Maintain a process for timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation or review.

Grievance Mechanism and Whistleblower Protection

- Ensure workers have a mechanism to report grievances that facilitates open communication between management and worker, without the fear of retaliation. Such mechanism should include an anonymous complaint mechanism.

Privacy and Data Protection

- Protect confidential information in accordance with their contractual obligations.
- Adopt and maintain processes to provide reasonable protections for personal, proprietary and confidential information, including information that they access, receive or process on behalf of Spectrum.
- Recognize that unauthorized use or disclosure of such information may have personal, legal, reputational and financial consequences for the vendor, individuals whose personal information may be implicated, and for Spectrum.
- Comply with all applicable privacy/data protection and information security laws and regulations.



OVERVIEW

Spectrum is committed to protecting human rights.

Spectrum prefers to work with Vendors that:

- Create a workplace that respects each workers' human rights including personal dignity and individual worth.
- Uphold the highest standards of human rights and have applicable policies and practices that apply to all workers, suppliers and their supply chains, including migrant and temporary workers.
- Comply with the spirit, as well as the letter, of regulations and laws in the jurisdictions in which we operate (e.g., Universal Declaration of Human Rights and the International Labor Organization (ILO) Core Conventions).

HUMAN RIGHTS

SPECTRUM PREFERS TO WORK WITH VENDORS WHO STRIVE TO:

Anti-Discrimination

- Not discriminate against any worker in hiring, compensation, access to training, promotion, termination and/or retirement based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity or expression, union membership, pregnancy, veteran status or any other status protected by country law.

Anti-Harassment and Abuse

- Commit to a workplace free of harassment and physical discipline or abuse.
- Not threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, sexual harassment, or any other forms of intimidation.

Prevention of Involuntary Labor and Human Trafficking

- Respect and promote human rights in accordance with the United Nations Guiding Principles on Business and Human Rights.
- Ensure all work is voluntary.
- Not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor.
- Ensure worker access to work-related documents. Vendors are discouraged from requiring workers to lodge "deposits", holding employee identity or immigration papers (including but not limited to passports or work permits), or destroying, concealing, confiscating or otherwise denying worker's access to such documents. Ensure workers are free to resign their employment in accordance with local and national laws or regulations without unlawful penalty.

Vendors who employ workers who are not a national of the country in which the work is taking place, and who were brought into that country for the purpose of working for the vendor, should provide return transportation to the worker's origin, or reimburse the worker for the cost of such trip upon the end of employment.



OVERVIEW

Spectrum believes all workers in the supply chain deserve a fair and ethical workplace.

LABOR

SPECTRUM PREFERS TO WORK WITH VENDORS WHO STRIVE TO:

Working Hours

- Follow all applicable laws and regulations with respect to working hours and days of rest, meal breaks, and overtime.

Wages and Benefits

- Provide wages and benefits that meet or exceed the requirements of local law.

Performance Objectives with Implementation Plans and Measures

- Maintain written standards, performance objectives, targets and implementation plans, including periodic assessments of the performance against those objectives.

Vendor Diversity and Inclusion

- Take proactive steps to provide a full Spectrum of businesses- based on the ownership structure (for example, women owned, locally owned), scale (for example, small or medium enterprise) or nature of the enterprise (for example, social enterprise)- with the opportunity to compete on a fair and equal basis for business.



OVERVIEW

Spectrum is committed to ensuring worker health, safety and well-being.

Spectrum prefers working with Vendors who provide and maintain a safe work environment and integrate sound health and safety management practices into its business, including those applicable to the areas of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and housing.

HEALTH AND SAFETY

SPECTRUM PREFERS TO WORK WITH VENDORS WHO STRIVE TO:

Health and Safety Training and Communication

- Provide workers with appropriate workplace health and safety training in their primary language, including safety information relating to hazardous materials.
- Prominently display health and safety information throughout their facilities.

Occupational Health, Safety and Hazard Prevention

- Identify, evaluate and manage occupational health and safety hazards through a prioritized process of hazard elimination, engineering controls and/or administrative controls.
- Provide workers with job-related, appropriately maintained personal protective equipment and instruction on its proper use.

Emergency Prevention, Preparedness and Response

- Identify and assess potential emergency situations. For each situation, vendors should develop and implement emergency plans and response procedures that minimize harm to life, environment and property.
- To the extent that the Vendor transports goods for Spectrum into the United States, Vendors should comply with the C-TPAT (Customs-Trade Partnership Against Terrorism) security procedures on the U.S. Customs website at www.cbp.gov (or other website established for such purpose by the U.S. government).

Incident Management

- Have a system for workers to report health and safety incidents and near-misses, as well as a system to investigate, track and manage such reports.
- Implement corrective action plans to mitigate risks, provide necessary medical treatment and facilitate workers' return to work.



OVERVIEW

Spectrum is committed to protecting the environment.

Spectrum prefers to work with Vendors that:

- Respond to challenges posed by climate changes and work toward protecting the environment.
- Minimize or eliminate waste across their operations and those of their suppliers.

ENVIRONMENT

SPECTRUM PREFERS TO WORK WITH VENDORS WHO STRIVE TO:

Environmental Laws, Permits and Registrations

- Comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste and wastewater discharges, including the manufacture, transportation, storage, disposal and release to the environment of such materials.
- Identify the chemicals or other materials being released that pose a threat to the environment and manage them appropriately to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.
- Obtain, keep current and comply with all required environmental permits and follow the operational and reporting requirements of such permits.

Material Restrictions and Handling

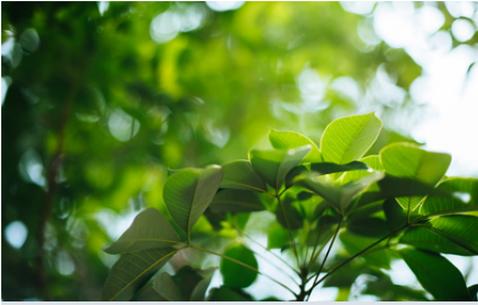
- Ensure all materials used by comply with applicable rules, laws and regulations regarding the prohibition or restriction of specific substances to ensure safe and responsible handling, storage and disposal.

Pollution Prevention and Resource Reduction

- Reduce energy, water and natural resource consumption by implementing conservation and substitution measures.
- Minimize hazardous substances, consumption by implementing reduction and substitution measures.

Waste Management Training

- Ensure all workers who handle hazardous and non-hazardous waste are properly trained on how to deal with substances and the potential hazards the material presents if mismanaged or released to the worker and environment.



OVERVIEW

Spectrum is committed to protecting the environment.

Spectrum prefers to work with Vendors that:

- Respond to challenges posed by climate changes and work toward protecting the environment.
- Minimize or eliminate waste across their operations and those of their suppliers.

ENVIRONMENT (CONT'D)

Water

- Take steps to conserve, reduce use of and reuse water in their own operations.
- Manage water resources to ensure their operations do not prevent access to sufficient safe water for all users in surrounding communities, including those both up and downstream from their facilities.
- Implement a systematic approach to identify, control and reduce wastewater produced by its operations.
- Conduct routine monitoring of the performance of its wastewater treatment systems.
- Implement a systematic approach to prevent contamination of stormwater runoff. Vendors shall prevent illegal discharges and spills from entering storm drains.

Air

- Identify, manage, reduce and responsibly control air emissions emanating from its operations that pose a hazard to the environment.
- Conduct routine monitoring of the performance of its air emission control systems.
- Establish greenhouse gas (GHG) emission reduction targets and select low-GHG products and services, where relevant.

Transporters and Haulers of Waste

- Only use permitted transporters and haulers that have a positive record of operating safely and complying with applicable transportation laws and best management practices.

Hazardous Substance Management and Restriction

- Implement a systematic approach to identify, manage, reduce and responsibly dispose of or recycle hazardous substances.

Non-Hazardous Waste Management

- Implement a systematic approach to identify, manage, reduce and responsibly dispose of or recycle non-hazardous waste.

COMPLIANCE HELPLINE

(844) 587-1660

www.sppirx.ethicspoint.com

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