



Code of Business Conduct and Ethics

1. INTRODUCTION

Dova Pharmaceuticals, Inc. ("**Dova**" or "**the Company**") is committed to creating an environment where we are able to do our best work while maintaining the highest standards of business conduct and ethics. This Code reflects the business practices and principles of behavior that support this commitment.

The Code reflects Dova's commitment to an ethical culture and conducting business with integrity. All employees are expected to read and understand the Code and its application to the performance of his or her business responsibilities. Likewise, we expect those who work on behalf of Dova to comply with the Code's terms in the performance of any services rendered.

The integrity and reputation of the Company depends on the honesty, fairness and integrity brought to the job by each person associated with us. You are expected to fully comply with the Code and all applicable policies and procedures.

2. BUSINESS STANDARDS AND LEGAL REQUIREMENTS

Our commitment to compliance with laws and regulations is the foundation of the Code. Our success depends upon you operating within legal guidelines and company policies and procedures. We expect our employees and those who work on behalf of Dova to understand the legal and regulatory requirements applicable to their business units and areas of responsibility. While we do not expect you to memorize every detail of these laws, rules and regulations, you are required to know when to seek advice from management, Legal, Human Resources or Compliance.

Violations of the law will not be tolerated. Dova will investigate complaints or concerns related to violations and investigate them thoroughly. Violation of laws, rules and regulations of any country may subject an individual, as well as the Company, to civil and/or criminal penalties. You should be aware that conduct and records, including emails, are subject to internal and external audits and to discovery by third parties in the event of a government investigation or civil litigation. It is in everyone's best interests to know and comply with our legal obligations.

a. Principles of Business Interactions

We promote our products ethically and honestly. Our sales, marketing, advertising and product labeling activities are required to always be truthful, balanced and not misleading. Our employees and those who work on behalf of Dova are expected to comply with applicable healthcare laws and follow company policies and procedures governing all interactions including those with our customers, patients, providers, payors and government officials.

When engaging in interactions with healthcare professionals and organizations, we

- avoid the perception of inappropriate influence;
- ensure transparency in all interactions and never offer or provide a transfer of value in an effort to influence prescribing decisions or secure an improper advantage;
- compensate at Fair Market value;
- document the services of healthcare professionals in a written agreement that outlines the purpose of the interaction, service performed, and the payment provided;
- ensure Scientific Exchange and materials are truthful, accurate, balanced, non-misleading and supported by scientific evidence; and
- respond promptly to reports of adverse events and product complaints.

b. Compliance Resources

To facilitate compliance with the Code, we have implemented a program of awareness, training and review. We have established the position of Compliance Officer to oversee this program, and we recognize that our people are our greatest strength in achieving our business goals. We are committed to ensuring resources, including policies, procedures, training and communications, are readily available to you to assure the execution of sensitive and regulated activities consistent with legal and policy requirements.

Managers have a special responsibility to model behaviors and provide guidance consistent with our Code. In addition, managers are required to educate all current and new personnel under their supervision about the substance and application of the Code.

Any questions relating to the Code, policies or procedures should be directed to your manager, Human Resources, Legal, or Compliance.

c. Raising Concerns and Non-Retaliation

Dova employees and those who work on behalf of Dova have an affirmative obligation and a unique opportunity to ask questions whenever choices or actions are unclear. You also have an obligation to report any actual or suspected misconduct. Concerns about potential misconduct should be raised to your manager, Human Resources, Legal, or Compliance. If you have a question or concern and you wish to raise anonymously, you may contact the Dova Advice-line by calling 1-877-647-3335 or accessing the online reporting portal at www.RedFlagReporting.com and entering the access code "Dova". Additional information is provided in Section 10 of the Code.

Dova takes good faith reports of suspected or actual misconduct seriously and maintains a strict non-retaliation policy. Any person engaging in retaliatory activity against any person who raises a good faith concern about potential misconduct will be subject to discipline up to and including termination.

d. Disclosure of Debarment, Exclusion and Other Restrictions

Information that may preclude an employee or those who work on behalf of Dova from involvement in company operations must be self-disclosed. This includes any restrictions preventing involvement in the U.S. federal healthcare programs. Dova reserves the right to screen employees and third parties for exclusion, debarment or other ineligibility in healthcare programs or government contracts.

e. Insider Trading

Employees and those who work on behalf of Dova who have access to confidential (or "inside") information are not permitted to use or share that information for stock trading purposes or for any other purpose except to conduct our business and must comply with all securities laws and regulations restricting insider trading of securities. If, in performing duties at Dova, an employee becomes aware of "material nonpublic information" concerning Dova, Swedish Orphan Biovitrum AB ("Sobi"), or any company transacting business with Dova or Sobi, that employee may not buy or sell securities of Sobi or any other company transacting business with Dova or Sobi, either on their own account or on behalf of Dova, Sobi, or any others, nor may that employee provide that material non-public information to others, until it is publicly disclosed in accordance with applicable laws, regulations and company procedures. To use material non-public information in connection with buying or selling securities, including "tipping" others who might make an investment decision on the basis of this information, is not only unethical, it is illegal. You must exercise the utmost care when handling material inside information.

"Material non-public information" is any non-public information that could have a material influence on investors' decisions to sell or buy securities. Examples may include issuance of shares, repurchase of shares, mergers and acquisitions, commercialization of new products, progress or failure of clinical trials, and material changes in financial forecasts.

f. International Business Laws

Our employees and those who work on behalf of Dova are expected to comply with the applicable laws in all countries to which they travel, in which they operate and where we otherwise do business, including laws prohibiting bribery, corruption or the conduct of business with specified individuals, companies or countries. The fact that, in some countries, certain laws are not enforced or that violation of those laws is not subject to public criticism is not an excuse for noncompliance. We expect our employees and those who work on behalf of Dova to comply with U.S. laws, rules and regulations governing the conduct of business by its citizens and corporations outside the U.S.

These U.S. laws, rules and regulations, which extend to all our activities outside the U.S., include:

- The Foreign Corrupt Practices Act, which prohibits directly or indirectly giving anything of value to a government official to obtain or retain business or favorable treatment and requires the maintenance of accurate books of account, with all company transactions being properly recorded;
- U.S. Embargoes, which generally prohibit U.S. companies, their subsidiaries and their employees from doing business with, or traveling to, countries subject to sanctions imposed by the U.S. government (currently, Cuba, Iran, North Korea, Sudan and Syria), as well as doing business with specific companies and individuals identified on lists published by the U.S. Treasury Department;
- U.S. Export Controls, which restrict exports from the U.S. and re-exports from other countries of goods, software and technology to many countries, and prohibit transfers of U.S.-origin items to denied persons and entities; and

- Antiboycott Regulations, which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person.

If you have a question as to whether an activity is restricted or prohibited, please ask before taking any action, including giving any verbal assurances that might be regulated by international laws.

g. Antitrust Laws

Antitrust laws are designed to protect the competitive process. These laws generally prohibit:

- formal or informal agreements with competitors that harm competition or customers, including price fixing and allocations of customers, territories or contracts;
- formal or informal agreements that establish or fix the price at which a customer may resell a product; and
- the acquisition or maintenance of a monopoly or attempted monopoly through anti-competitive conduct.

Certain kinds of information, such as our strategies and identification of local business partnerships, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be and regardless of the setting, whether business or social.

Antitrust laws impose severe penalties for certain types of violations, including criminal penalties and potential fines and damages of millions of dollars, which may be tripled under certain circumstances. Understanding the requirements of antitrust and unfair competition laws of the various jurisdictions where we do business can be difficult, and you are urged to seek assistance from your manager or the Compliance Officer whenever you have a question relating to these laws.

h. Environmental Compliance

Federal law imposes criminal liability on any person or company that contaminates the environment with any hazardous substance that could cause injury to the community or environment. Violation of environmental laws can involve monetary fines and imprisonment. We expect employees to comply with all applicable environmental laws.

3. FAIR DEALING

We strive to outperform our competition fairly and honestly. Advantages over our competitors are to be obtained through superior performance of our products and services, not through unethical or illegal business practices. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance our interests. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering, you must consult your manager or the Compliance Officer, as further described in Section 10.

You are expected to deal fairly with our partners, suppliers, contributors, employees and anyone else with whom you have contact in the course of performing your job. Be aware that the Federal Trade Commission Act provides that "unfair methods of competition in commerce, and unfair or deceptive acts or practices in commerce, are declared unlawful." It is a violation of the Act to engage in deceptive, unfair or unethical practices and to make misrepresentations in connection with sales activities.

4. CONFLICTS OF INTEREST

Our employees and those who work on behalf of Dova are required to avoid any conflict or potential conflict between their personal interests (including those of their significant others and immediate family) and the best interests of the Company. For example:

r:tr **Tell us about any potential conflicts you have.** For example, conflicts may arise when you, a significant other, or a member of your immediate family has a connection to one of the Company's competitors or collaborators.

r:tr **Do not establish or hold a significant financial interest in, or provide services to, any of our competitors, customers, partners or service providers.** For example, you cannot advise or serve on the board for a Company competitor, even if you are not compensated for your work. You cannot make a significant investment in one of our competitors, either. A financial interest that exceeds \$50,000 is presumed to be significant.

r:tr **Do not conduct business on behalf of the Company if you have a personal stake in the outcome (other than the compensation you receive from the Company).** For example, employees should not transact business on behalf of the Company with a company with which they have a financial interest. Material related-party transactions involving any executive officer or director must be publicly disclosed as required by applicable laws and regulations.

r:tr **Do not solicit contributions for any charity or political candidate from any person or entity that does business or seeks to do business with us.**

Please note that the examples listed above extend to conflicts involving the personal interests of your family members and significant others. In addition, please note that all loans and guarantees by the Company must be approved in advance by the Board of Directors because of the potential for conflicts of interest.

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an officer or director of the Company, you should discuss the matter with your manager or the Compliance Officer (as further described in Section 10). Managers may not authorize conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first discussing the matter with the Compliance Officer and providing the Compliance Officer with a description of the activity. If the manager is involved in the potential or actual conflict, you should discuss the matter directly with the Compliance Officer. Officers and directors should consult with Legal regarding any potential or actual conflicts of interest.

5. CORPORATE OPPORTUNITIES

You may not take personal advantage of opportunities for the Company that are presented to you or discovered by you as a result of your position with us or through your use of corporate property or information. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business. You may not use your position with us or corporate property or information for improper personal gain, nor should you compete with us in any way.

6. GIFTS AND ENTERTAINMENT

Business gifts and entertainment are meant to create goodwill and sound working relationships and not to gain improper advantage with partners or customers or facilitate approvals from government officials. The exchange, as a normal business courtesy, of meals or entertainment (such as tickets to a game or the theater or a round of golf) is a common and acceptable practice as long as it is not extravagant. Unless express permission is received from a manager or the Compliance Officer, gifts and entertainment cannot be offered, provided or accepted by any employees and those who work on behalf of Dova unless consistent with customary business practices and not (a) of more than U.S. \$250.00 in monetary value, (b) in cash, (c) susceptible of being construed as a bribe or kickback, (d) made or received on a regular or frequent basis or (e) in violation of any laws. This principle applies to our transactions everywhere in the world, even where the practice is widely considered "a way of doing business". Employees and those who work on behalf of Dova should not accept gifts or entertainment that may reasonably be deemed to affect their judgment or actions in the performance of their duties. Our partners, suppliers, contributors, consumers and the public at large should know that our employees' judgment is not for sale.

Under some statutes, such as the U.S. Foreign Corrupt Practices Act (further described in Section 2), giving anything of value to a government official to obtain or retain business or favorable treatment is a criminal act subject to prosecution and conviction. Discuss with your manager or the Compliance Officer any proposed entertainment or gifts if you are uncertain about their appropriateness.

7. CONFIDENTIALITY

One of our most important assets is our confidential information. We sometimes share confidential information with our employees and those who work on behalf of Dova and we expect you to keep that information confidential, and not disclose or use it except as needed to perform your work here, as you agreed in your confidentiality agreement with the Company. If you don't know whether something is confidential, ask your manager. Unless you hear otherwise, you should assume that everything (financials, strategy and plans, scientific and technical data, details and results of our studies and clinical trials, information about our product candidates, employees and those who work on behalf of Dova, legal disputes, etc.) is confidential.

In addition, because we interact with other companies and organizations, there may be times when you learn confidential information about other companies before that information has been made available to the public. You must treat this information in the same manner as you are required to treat our confidential and proprietary information. There may even be times when you must treat as confidential the fact that we have an interest in, or are involved with, another company.

All of our employees and those who work on behalf of Dova have a duty to refrain from disclosing to any person confidential or proprietary information about us or any other company learned in the course of employment here, until that information is disclosed to the public through approved channels (usually through a press release or a formal communication from a member of senior management). This policy requires you to refrain from discussing confidential or proprietary information with outsiders and even

with other Company employees, unless those fellow employees have a legitimate need to know the information in order to perform their job duties. Unauthorized use or distribution of this information could also be illegal and result in civil liability and/or criminal penalties.

You should also take care not to inadvertently disclose confidential information. Materials that contain confidential information, such as memos, notebooks, computer disks, memory sticks, laptop computers, tablets and mobile devices, should be stored securely. Unauthorized posting or discussion of any information concerning our business, information or prospects on the Internet is prohibited. You may not discuss our business, information or prospects on blog posts or social media sites (including Facebook and Twitter), or in response to news reports or articles, regardless of whether you use your own name or a pseudonym. All Company emails, voicemails and other communications are presumed confidential and should not be forwarded or otherwise disseminated outside of the Company, except when required for legitimate business purposes. Be cautious when discussing sensitive information in public places like elevators, airports, restaurants and "quasi-public" areas within the Company, such as cafeterias. Please take special care when talking to your friends, family, or others about the Company or our industry.

In addition to the above responsibilities, if you are handling information protected by any privacy policy published by us, then you must handle that information in accordance with the applicable policy.

8. MAINTENANCE OF CORPORATE BOOKS, RECORDS, DOCUMENTS AND ACCOUNTS; FINANCIAL INTEGRITY; PUBLIC REPORTING

The integrity of our records and public disclosure depends upon the validity, accuracy and completeness of the information supporting the entries in our books of account. Therefore, our corporate and business records should be completed accurately and honestly. The making of false or misleading entries, whether they relate to financial results or otherwise, is strictly prohibited. Our records serve as a basis for managing our business and are important in meeting our obligations to our partners, local business customers, contributors, creditors, employees and others with whom we do business. As a result, it is important that our books, records and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities. We require that:

- no entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities or misclassifies any transactions as to accounts or accounting periods;
- transactions be supported by appropriate documentation;
- the terms of commercial transactions be reflected accurately in the documentation for those transactions and all such documentation be reflected accurately in our books and records;
- employees and those who work on behalf of Dova comply with our system of internal controls; and
- no cash or other assets be maintained for any purpose in any unrecorded or "off-the-books" fund.

Our accounting records are also relied upon to produce reports for our management, stockholders and creditors, as well as for governmental agencies. In order to ensure the integrity of our records:

- no employee may knowingly take or authorize any action that would cause our financial records or financial disclosure to fail to comply with applicable laws, rules and regulations;
- all employees must cooperate fully with our accounting teams, as well as our independent public accountants and counsel, respond to their questions with candor and provide them with complete and accurate information to help ensure that our books and records are accurate and complete; and
- no employee should knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of our reports filed with any government agencies or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of our reports accurate in all material respects.

Any employee who becomes aware of any departure from these standards has a responsibility to report his or her knowledge promptly to a manager, the Chief Financial Officer or one of the other compliance resources described in Section 10.

9. WAIVERS

Any waiver of this Code for executive officers (including, where required by applicable laws, our principal executive officer, principal financial officer, principal accounting officer or controller (or persons performing similar functions) or directors may be authorized only by the Board or, to the extent applicable, a committee of the Board and may be disclosed to stockholders as required by applicable laws, rules and regulations.

10. REPORTING VIOLATIONS OF THE CODE

Your most immediate resource for any matter related to the Code is your manager. He or she may have the information you need or may be able to refer the question to another appropriate source. There may, however, be times when you prefer not to go to your manager. In these instances, you should feel free to discuss your concern with the Compliance Officer. A dedicated email address for the Compliance Officer at compliance@dova.com is available to those who wish to seek guidance on specific situations or report violations of the Code, or to ask questions about the Company's policies.

If you have a question or concern and you wish to raise it anonymously, you may contact the Dova Advice-line by calling 1-877-647-3335 or accessing the online reporting website at www.RedFlagReporting.com and entering the access code "Dova."

Whether you identify yourself or remain anonymous, your contact will be kept strictly confidential to the extent reasonably possible within the objectives of the Code.

If you encounter a situation or are considering a course of action and its appropriateness is unclear, you should discuss the matter promptly with your manager or the Compliance Officer. Even the appearance of impropriety can be very damaging and should be avoided.

If you are aware of a suspected or actual violation of the Code standards by others, you have a responsibility to report it. You are expected to promptly provide a compliance resource with a specific description of the violation that you believe has occurred, including any information you have about the persons involved and the time of the violation. Whether you choose to speak with your manager or the Compliance Officer, you should do so without fear of any form of retaliation. We will take prompt

disciplinary action against any employee who retaliates against you, which may include termination of employment.

Managers must promptly report any complaints or observations of Code violations to the Compliance Officer. If you believe your manager has not taken appropriate action, you should contact the Compliance Officer directly. The Compliance Officer will investigate all reported possible Code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances. Neither you nor your manager may conduct any preliminary investigation, unless authorized to do so by the Compliance Officer. Your cooperation in the investigation will be expected. As needed, the Compliance Officer will consult with the legal department, the Human Resources department and/or the Board. It is our policy to employ a fair process by which to determine violations of the Code.

If any investigation indicates that a violation of the Code has probably occurred, we will take such action as we believe to be appropriate under the circumstances. If we determine that an employee is responsible for a Code violation, he or she will be subject to disciplinary action up to, and including, termination of employment and, in appropriate cases, civil action or referral for criminal prosecution. Appropriate action may also be taken to deter any future Code violations.