

November 2020

Alimera Sciences Foreign Corrupt Practices Act for Employees, Distributors and Representatives

Alimera Sciences Inc. and its subsidiaries (**Alimera**) are committed to ethical standards of business conduct. Alimera supports full compliance with the U.S. Foreign Corrupt Practices Act (**FCPA**) and comparable laws in other jurisdictions that prohibit commercial bribery, including the UK Bribery Act of 2010 (**UK Bribery Act**; collectively **Anti-Bribery Laws**). Alimera expects and requires that its employees, business partners, agents, representatives and distributors globally will (i) act in strict compliance with Anti-Bribery Laws and this Policy and (ii) immediately report any suspected or actual violations of Anti-Bribery Laws or this Policy to Alimera's Compliance Officer, the Audit Committee Chairman or the Chairman of the Board of Directors as described in this Policy.

At Alimera, we conduct business ethically and with integrity wherever we are and whatever our role. This Policy explains our standards of conduct in potentially sensitive situations so you can always find the right way to act.

Please read this Policy carefully and retain a copy for future use.

/s/ Rick Eiswirth

Richard S. Eiswirth, Jr.
President and Chief Executive Officer

FOREIGN CORRUPT PRACTICES ACT AND COMPARABLE ANTI-BRIBERY LAWS

Alimera conducts business operations in many jurisdictions. These operations are subject to various laws combatting corruption, including the FCPA and other local anti-bribery laws such as the UK Anti-Bribery Act). Alimera's employees, contractors, representatives, agents and distributors (collectively, **Representatives**) are required to know, understand, and at all times comply with all anticorruption laws applicable to them, including the FCPA, the UK Anti-Bribery Act and other applicable Anti-Bribery Laws. In addition, Alimera's Representatives are required to report actual or potential violations of these laws involving Alimera, or its products or services in any way, to Alimera's Compliance Officer, to the Audit Committee Chairman, or to the Chairman of the Board of Directors as set forth below:

Via Mail:

Alimera Sciences, Inc.
6120 Windward Parkway
Suite 290
Alpharetta, Georgia 30005
USA

Via email:

AlimeraCompliance@getintouch.com or compliance@alimerasciences.com

Via web:

www.intouchwebsite.com/AlimeraCompliance

Via phone:

Outside US: +33 975 183 032 (FR)
+49 32 211 001 422 (DE)
+351 308 802 620 (PT)
+44 33 080 80 991 (UK)
+1 678 990 5740 (US direct)

Via Facsimile

Outside US: 001 678-990-5744

Inside US: 844-676-2405 or
678-990-5740

Inside US: 678-990-5740

Reports may be made anonymously through any of the above methods. The InTouch Website and GetInTouch email address are managed by a third-party provider. Alimera may update this information to provide additional or other ways to report concerns as determined by the Compliance Officer or Audit Committee.

SUMMARY OF RESTRICTIONS

Prohibited Behavior

- Under the FCPA, no Representative may give, offer or promise to give, whether directly or indirectly through another person, any money or anything else of value (include, for example, food, drinks, gifts, entertainment, travel, or personal favors) to any Foreign Official (defined below), in order to secure, keep or obtain any favorable treatment for Alimera or Alimera's products and services, including an advantage in any contract or regulatory matter. **This Policy is violated whether or not the attempt is successful.**
- Under the UK Anti-Bribery Act, no Representative may offer, promise or give to *any* person (not just Foreign Officials) a financial or other advantage for the purpose of bringing about an improper performance of a function or activity.

Some examples of prohibited behavior:

- No Representative may bribe a government employee in order to obtain favorable treatment for Alimera. For example:
 - Bribe a customs official to ease the process of importing Alimera products; or
 - Bribe an employee of a government-owned hospital to encourage that employee to support the purchase of Alimera products or services.

- No action that a Representative would be prohibited from taking under this Policy may be taken through a third party such as a friend, relative, distributor or consultant.

Foreign Official for purpose of this Policy means:

- any officer or employee of a foreign government;
- any officer or employee of any department, agency, or instrumentality of a foreign government;
- any officer or employee of a Public International Organization that has been designated as such by the President of the United States (such as, for example, the World Bank, the International Monetary Fund or the World Trade Organization);
- any person acting in an official capacity for or on behalf of any foreign government or department, agency, or instrumentality of a foreign government, or for or on behalf of any Public International Organization;
- any foreign political party or official thereof; or
- any candidate for foreign political office.

The term Foreign Official also includes any employee of a state-owned or state-controlled enterprise, even if that enterprise is run like a private business. In certain countries a significant number of the citizens are Foreign Officials due to the close connections between private enterprise and the government and/or party affiliations. **Alimera Representatives should be aware that many non-U.S. physicians, hospitals and other health care providers and health care system employees are likely Foreign Officials.** The determination as to whether a particular person is an instrumentality of a foreign government is complex. Representative must always err on the side of caution and consult with Alimera's Compliance Officer if there is any doubt or uncertainty about this issue.

For purposes of the FCPA, foreign government or government-run entity refers to authorities and entities outside of the United States. Please note, however, that the UK Anti-Bribery Act does not distinguish between bribes of Foreign Officials and bribes of private citizens.

Facilitating Payments:

Facilitating payments for purposes of this Policy are small payments made to effect routine government actions that involve non-discretionary matters. Some examples of these non-discretionary matters are custom clearances of materials and persons, processing visas, delivering mail, supplying utilities and providing police protection.

Although the FCPA and some other applicable Anti-Bribery Laws may allow these types of payments, the law in this area is complex. For example, such payments are illegal under the UK Bribery Act and almost always illegal under the laws of the host country. For that reason, **facilitating payments are strictly prohibited without receiving prior, written approval from Alimera's Compliance Officer.** In addition, payments that are lawful under the express, written laws of the foreign country in which the action takes place but appear to be inconsistent with this Policy may on occasion be permissible but only **with the prior written consent of Alimera's Compliance Officer.**

No Materiality Standard

Most Anti-Bribery Laws, including the FCPA and UK Anti-Bribery Act, do not contain any "materiality" standard; all violations, regardless of the value of the bribe, are considered equally serious, subject to criminal penalty, and will not be tolerated.

Other Payments to Be Avoided:

Certain types of payments or other benefits to third parties often create an appearance of impropriety and should be avoided without the express consent of the Alimera Compliance Officer. These include:

- Situations where excessive commissions are paid or promised to third-party agents or consultants, especially when the services are only vaguely described.
- Situations where the third party is related to or associated with a foreign official.
- Situations where a third-party consultant's normal line of business is different than that for which we have retained the consultant.
- Situations where the third party becomes involved at the request of a government official.

In order to ensure that its Representatives throughout the world fully comply with this Policy, the FCPA and other applicable Anti-Bribery Laws, Alimera reserves the right to conduct audits and inspections of the facilities, books and records of all of Alimera's Representatives. Failure to cooperate with such an audit will result in immediate termination of our business relationship.

POLITICAL CONTRIBUTIONS OUTSIDE THE U.S.

The FCPA does not prohibit political contributions if the purpose of the contribution does not relate to the obtaining or retention of business.

However, political contributions and activities warrant special attention because the purpose of such contributions and activities could be misconstrued as payments to obtain or retain business in a given country. Since Alimera and its subsidiaries are potential government suppliers throughout the world, the legality of such contributions might be questioned if the contributions appear to be connected to particular business relationships or are so large in amounts as to suggest that at least an implicit quid pro quo understanding exists.

It is also recognized that it may be appropriate for Alimera and its subsidiaries to support the political process through contributions in countries where such contributions are legal, publicly known and accepted, and could not be misconstrued as having been made for any improper purpose.

Therefore, with respect to non-U.S. political contributions, Alimera and its subsidiaries will neither fund nor in any way give support to any political party or official or to any candidate for political office, even where permitted by law, unless such political contributions receive the prior approval of the Chief Executive Officer. Prior to submission to the Chief Executive Officer, any proposed contribution must first be reviewed by the Compliance Officer to assure the contribution would comply with applicable laws and policies. Any contributions made in accordance with this procedure must be accounted for properly in the books and records of the Company and will be reported to the Audit Committee of the Board of Directors for their information.

Please note that this Policy does not prohibit a Representative from making lawful political contributions on his or her own behalf.

Compliance Officer

The CEO of Alimera Sciences, Inc. will designate a Compliance Officer responsible for investigating and reporting to the company's Audit Committee all reports of violations of this Policy and for assuring the confidentiality thereof, subject to disclosure obligations to the U.S. Government, any foreign government or state, local or other applicable law enforcement authorities. The Compliance Officer is responsible for this Policy and the administration of training and compliance programs to insure compliance with this Policy.

Compliance and Training Program

The Compliance Officer shall develop and implement a compliance and training program in order to make Representatives knowledgeable about this Policy and Alimera's requirement of strict compliance.

Reporting Violations of this Policy or the Law

It is the obligation of every director, officer, employee and Representative of Alimera to report all actual or suspected violations of this Policy to Alimera's Compliance Officer or to the Audit Committee Chairman or the Chairman of the Board of Directors.

All reports will be promptly investigated, and appropriate corrective or disciplinary action will be taken. No report shall result in negative consequences to any individual who in good faith reports a violation of this Policy.

Questions About this Policy

Any Representative with questions about this Policy should talk initially to his or her primary business contact at Alimera who shall be responsible for directing the Representative to the appropriate contact at Alimera, or the Representative may contact the Compliance Officer directly.