



# Code of business conduct

## “The Code”

Idorsia’s Code of Business Conduct (“the Code”) establishes corporate standards of behavior for all Idorsia employees. By maintaining the standards of conduct described in this Code, you enable Idorsia to fulfill its commitment to the highest integrity in business conduct.

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### **The main provisions of the code are:**

- Employees of Idorsia and its worldwide affiliates are responsible for always demonstrating honesty, integrity, and respect in their work activities, obeying applicable laws and regulations, and adhering to Idorsia policies and procedures, including this Code of Business Conduct.
- Supervisors are accountable for compliance and business conduct in the group they manage.
- Department heads are accountable for compliance and business conduct in their functional or operational area.
- Idorsia is committed to a work environment that encourages honest discussion of issues and concerns about legal compliance, Company policy, and business conduct.

- Employees who learn of or suspect a legal, ethical, or policy violation must raise it with their supervisor, or their local compliance champion, or the Corporate Compliance Office, or through the Global Compliance Helpline at 0800 110 007 (for Switzerland), +41 58 844 0106 for outside Switzerland, or [compliance@Idorsia.com](mailto:compliance@Idorsia.com).
- Idorsia does not permit measures against anyone who, in good faith, raises issues, concerns, or allegations of compliance violations or unethical conduct.
- Idorsia will investigate all allegations of misconduct, including violations of this Code and, where appropriate, take disciplinary and corrective action, up to and including termination of employment.

While covering a wide range of business practices and procedures, this Code cannot and does not cover every issue that may arise, or every situation where decisions must be made; rather, it sets forth key guiding principles that represent Company policies and established conditions for continued employment.

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### **How should I use the code?**

While all Idorsia employees are expected to exercise good judgment, it is not always easy to determine what is “right” depending upon the circumstances.

Idorsia’s Code of Business Conduct is intended to help employees arrive at the right decision, providing guidance in situations that may pose questions or require difficult judgments.



# Legal compliance & ethical practices



## Compliance with laws & regulations

Acting with honesty, integrity, and respect is the foundation upon which this Code is built and how Idorsia conducts business. In addition to this guiding principle, obeying laws and regulations, both in letter and in spirit, is critical to our success. While Idorsia employees are not expected to know the details of every law or regulation, it is important that employees are aware of the core requirements established in this Code and know when to seek advice from their supervisor or the Corporate Compliance Office.

Idorsia strives to provide fair and competitive wages to our employees based on performance and ethical conduct and to protect our employees from unsafe or improper working conditions.

Idorsia is also committed to quality in the manufacturing, packaging, and testing of its products. To ensure patient safety, it strives to meet or exceed applicable regulatory authority requirements for current Good Manufacturing, Clinical and Laboratory Practices (cGMPs).

Idorsia is required to compile and maintain numerous records and to file reports and applications with various government agencies. Virtually all of these agencies operate under laws which make it a crime -punishable by fines and/or imprisonment - to knowingly submit false or incomplete information, to fail to submit required information, or to fail to submit information within a required time period. Carelessness alone can constitute an offense in some instances and can call into question Idorsia's competency and good faith.

Accordingly, Idorsia requires that all employees who prepare information, records, or submissions for governmental agencies, or who otherwise deal with such agencies, do so diligently, accurately, completely, and with absolute integrity.

To ensure Idorsia employees are prepared to perform their duties effectively and in compliance with our quality requirements, the Company provides appropriate instruction and training.

Each department head is responsible for ensuring that employees within their group complete all required training. Employees are expected to complete prescribed training and acknowledge, in writing, that they understand and will comply with relevant laws, rules and regulations, as well as Company policies and procedures.

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### Laws and regulations with which idorsia must comply include, among others, those that address:

- The research, development, pharmacovigilance, manufacturing, marketing, promotion, and distribution of pharmaceutical products
- Labor and employment laws
- Securities laws
- Anti-competitive (anti-trust) laws
- Privacy laws
- Corporate Governance laws relating to duties owed by corporate directors and officers

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## Business practices

Interactions with vendors, customers, competitors, collaborators, healthcare professionals (HCPs), patients, and government officials must always be legal, transparent, and ethical. Offering or accepting an inducement (financial or otherwise) in exchange for the purchase of and/or recommendation to purchase a product or service is inappropriate and prohibited.

### Gifts and entertainment

#### Non-Governmental, Non-HCP Business Associates

While providing, hosting, or accepting a business courtesy, such as a modest meal, gift and/or entertainment, may be acceptable under certain circumstances, the business courtesy must be reasonable in nature, permissible under applicable laws and regulations, and compatible with industry standards and local customs. To avoid even the appearance of a conflict of interest, employees must exercise caution, honesty, and good judgment. In uncertain circumstances, or if there is any doubt, the situation must be presented to a supervisor, who has the ultimate responsibility and authority to approve the offering or acceptance of a business courtesy.

Idorsia employees are strictly prohibited from requesting business courtesies of any kind. If refusal of a gift that exceeds normal business courtesy would offend the giver, the gift should be accepted and then forwarded to the Corporate Compliance Office for appropriate handling.

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### Examples of prohibited “inducements” to secure business may include:

- Gifts, entertainment, or hospitality that is excessive or lavish
- Donations to third parties at the request or direction of another party
- Paying travel expenses or accommodations for an individual without a legitimate business purpose
- Accepting or providing a gift, money, cash equivalent, or other item of value
- Providing free goods or services
- Payments to government officials to influence governmental actions



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## HCPs, Business Associates

Offering business courtesies to HCPs is regulated in many countries by law and/or industry codes, which are concerned with the potential conflict of interest created by industry's influence on HCPs. To address these concerns and ensure our focus remains on patient care, Idorsia is committed to only providing business courtesies consistent with local country requirements, and for the purpose of facilitating patient or HCP education.

For this reason, business courtesies may never be provided with the intent of inappropriately inducing an HCP to prescribe, purchase, or recommend any products.

## Government Officials

Many countries have anti-bribery laws regulating the offering of business courtesies to government employees and representatives (collectively, "government officials"). Idorsia policy prohibits offering, promising, paying, or giving anything of value, directly or indirectly, to a government official for the purpose of unduly influencing a government action. Prohibited items of value may include, but are not limited to, cash payments, meals, personal gifts, travel, and entertainment.

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**Around the world there are wide-ranging interpretations of "normal business practices". What is considered a customary business courtesy in one country may be viewed as improper in another. What does that mean for idorsia employees?**

Idorsia employees must not provide any payment or benefit of any kind or provide anything of value to gain an improper business advantage regardless of the country in which the conduct takes place. Before making any payment or providing anything of value, seek guidance from your supervisor, your local compliance champion, or the Corporate Compliance Office.



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### **Anti-competitive practices and fair dealing**

Idorsia is committed to protecting free enterprise through compliance with applicable anti-competition laws and regulations. Violation of laws and regulations designed to ensure competition and free enterprise can have serious consequences for the Company and for individuals. Below are some examples of activities with important anti-competition implications:

- Agreeing with competitors to fix prices or other terms of sale
- Boycotting certain suppliers or customers
- Dividing sales opportunities with competitors by territory or product line
- Agreeing with distributors on mandatory resale pricing
- Price discrimination
- Disparaging, misrepresenting, or harassing a competitor

Anti-competition issues are complex and should be referred to the Group General Counsel. Idorsia seeks to outperform competition fairly and honestly through superior performance and never through dubious or illegal business practices. Misappropriating proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited.

### **International trade**

Employees whose job functions involve international trade must be knowledgeable of and compliant with the applicable legal requirements and restrictions, such as trade embargoes, boycotts, import/ export restrictions, local importation customs practices and requirements, and other trade and taxation laws and regulations, as well as relevant Company policies.

For questions relating to matters of international trade, employees must consult their supervisor or the Group General Counsel.

## Conflicts of interest

A conflict of interest exists whenever an individual representing Idorsia uses their position to engage in conduct that compromises, or appears to compromise, their ability to make an impartial business decision to the ultimate benefit of the Company.

Idorsia employees are strictly prohibited from engaging in any activities that may result in a conflict of interest, unless previously disclosed to their supervisor and authorized by the Corporate Compliance Office.

It is not possible to describe every situation or occurrence that could lead to a conflict of interest. Therefore, employees must avoid any circumstance that could even lead to the appearance of impropriety.

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### What are some ways to avoid conflicts of interest?

Idorsia employees can avoid conflicts of interest by always basing business decisions on normal business considerations such as quality, cost, availability, reputation, and other factors bearing directly on the product or service. Idorsia employees must not use their position to directly or indirectly benefit themselves or others (including but not limited to relatives or close associates).

Decisions and actions involving Idorsia and its business must always be based upon what is in the best interests of Idorsia. If you are uncertain whether a conflict of interest might exist, contact your supervisor or the Corporate Compliance Office before making a decision or engaging in an activity.



Some common conflict of interest situations may include:

**Financial interests**

Holding, by an Idorsia employee or direct family member, a direct or indirect financial interest of more than 5% in a vendor or customer.

**Employment**

Being employed by, providing consulting services for, or serving as an officer or director of another company, including but not limited to competitors, customers, suppliers, or vendors to Idorsia.

**Business and financial transactions**

Conducting Idorsia business transactions with a company that employs a family member of an Idorsia employee.  
 Entering into personal financial transactions with an employee or representative of a customer, competitor, or vendor.

**Corporate opportunities**

Using non-public information acquired as a result of employment with Idorsia.  
 Taking advantage of business opportunities that rightfully belong to Idorsia.  
 Selling services or products that compete with Idorsia.

**Non-business activities**

Participating in trade association, non-profit, or other non-business activities to the detriment of performing Idorsia job duties.

**Personal use of company property and information**

Using or diverting Company property for non-business activities.

Note: The above examples are provided for illustration and do not represent a comprehensive listing of all potential conflict of interest situations.

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**The spouse of an idorsia employee has an ownership interest in an advertising company idorsia is considering using. The idorsia employee does not have any decision-making responsibilities as to which vendor is selected. Does this present a conflict of interest?**

No. This is a potential conflict of interest. Importantly, any actual or potential conflict of interest or even the appearance of a conflict of interest could damage an employee’s reputation or that of the Company. The relationship must immediately be disclosed to your supervisor or to the Corporate Compliance Office for advice.



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## Political contributions & activity

It is recognized that as a member of a highly regulated and publicly visible industry, certain political initiatives may affect Idorsia business. Idorsia's political activities will occur only through participation in and membership of industry associations (e.g., Interpharma, PhRMA). The Chief Executive Officer must approve consultation and hiring of political lobbyists as well as active or passive participation in any associations, parties, or other interest groups.

Direct support (financial or otherwise) of political parties or individual candidates for public office by Idorsia is prohibited. Idorsia employees, in their company capacity, cannot make any loan, donation, contribution, or payment to a political party, candidate, or political action committee, for or on behalf of the Company, or any project or development in which the Company is engaged, nor shall they cause the Company to reimburse any individual who provides such support. (Nothing contained in this Policy shall prohibit Idorsia employees from taking any of the above actions as a private citizen, in his or her name, provided that the action is exclusively on their own accord and is not an indirect means of accomplishing one of the prohibited actions.)

For questions relating to political contributions and activities, consult with your supervisor, your local compliance champion, or the Corporate Compliance Office.

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## The work environment

### Interactions with others

Idorsia is firmly committed to providing equal opportunity and a positive working environment in all aspects of employment. Idorsia employees must treat each other and our third party stakeholders with respect at all times.

Discrimination based on race, color, religion, national origin, sexual orientation, gender, age, disability, or any other legally prohibited basis, is prohibited. This applies to all employment practices, including recruiting, hiring, pay, performance reviews, training and development, promotions, and other terms and conditions of employment.

Similarly, Idorsia does not permit any form of harassment.

This includes any abusive conduct, including verbal, non-verbal, or physical conduct that demeans or shows hostility toward an individual.

### Policy against retaliation

Retaliation or other means of counter measures are prohibited against any employee who has made a complaint in

good faith about discrimination, harassment, sexual harassment, wrongdoing and violations of law, or Company policies or procedures to appropriate Company managers, or who has cooperated in the investigation of such a complaint.

Retaliation includes any employment decision or other conduct made with the intent to punish an employee for submitting a complaint or assisting in a Company investigation, as well as any decision or conduct that might have discouraged an employee from submitting a complaint or cooperating in an investigation.

### Health, safety, and the environment

Idorsia recognizes that excellence in health and safety (“H&S”) performance is integral to an efficient and successful business. Idorsia will constantly pursue high standards of H&S performance in all its activities.

All employees must comply with the Company’s environmental, health, and safety policies and procedures, as well as local laws and regulations. Employees must also attend required training and perform

their jobs in a manner that promotes a safe and healthy workplace while also preserving and protecting the environment.

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### What behaviors might be considered harassment?

Behavior that might be considered harassment may take many forms and can include words, gestures, or acts. Examples include jokes related to race, religion, ethnic origin, or other personal characteristics, teasing that causes someone to feel humiliated, bullying, displays of inappropriate material, unwelcome flirting or sexual advances, and threats of violence.

Be aware that behavior that is “acceptable” in one country may not be acceptable elsewhere.



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## Idorsia property & resources

All Idorsia facilities and equipment are Idorsia property. Employees are responsible for the appropriate use of Idorsia facilities, equipment, and services. Any suspected incident of theft or fraud must be reported immediately for investigation.

Employees are not permitted to access another employee's office or computer unless prior permission is received from that employee or from a supervisor in instances where such action is necessary to conduct Company business. It is against Company policy to use or divert any Company property, including services of other employees and Company information, for personal advantage or benefit or for use in non-Idorsia business activities or non-business activities unrelated to the Company.

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### Protecting company property and resources:

- Handle Company assets and equipment carefully to minimize loss and damage
- Use Company assets for legitimate business purposes only
- Secure Company equipment and information such as laptops or work files when traveling or at other times when they are outside the office
- Follow Company policies and instructions regarding user IDs and passwords
- Notify the Global Information Technology (IT) department and line management immediately in the event of loss or theft of equipment
- Do not introduce software onto Company-provided equipment without the advance approval of the Idorsia Global IT department

## Equipment and electronic communications

Idorsia computers, communications devices/equipment, and networks may only be used in accordance with Company policy and may never be used to access, receive, or transmit material that is illegal or inappropriate. If sending proprietary or confidential information to persons outside of the Company's email system or if receiving information from persons that are transmitting such information via a non-company email or data transfer system, the Company's IT safety protocols and precautions must be observed.

## Travel

Business travel must have a legitimate business rationale and be conducted in such a manner as to optimize the benefit of the trip to the Company (e.g., maximize use of employee time spent working upon Company business while also using Company resources efficiently).

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# Data and information policies



## Record keeping

Company records, such as laboratory notebooks, product information, financial information, and government filings, must be an accurate and verifiable record of all activities and transactions. All data must be recorded and maintained according to Idorsia record retention policies and procedures.

The Company's processes shall be designed to ensure reasonable assurance of effective and efficient operations, compliance with laws and regulations, and the safeguarding of assets and reliable financial information (Sarbanes-Oxley Act of 2002). Idorsia employees entrusted with control over these assets and financial information, shall, through the use and maintenance of controls, implement and uphold an environment in line with Idorsia's compliance Framework. Recording financial transactions follows generally accepted accounting principles in the United States (US GAAP) and applicable local law. Financial information shall be presented fairly, in all material respects, reflecting the financial position of the Company. Maintaining undisclosed or unrecorded funds or assets

and liabilities established for any purpose is prohibited. Financial information shall be readily understandable by users and relevant to the economic decision-making needs of users in all material respects. The information filed with, or submitted to, any regulatory body, as well as shared through internal and external communication channels, has to be reliable in terms of complete and fair presentation.

The manner in which information is recorded reflects on the Company's scientific and business integrity, and all employees are responsible for adhering to the highest standards of their profession. Reports and interpretation of data and results (including financial results) must be done in good faith and in such a manner as to prevent misleading the reader, or disguising or misrepresenting any aspect of a transaction. Falsification of records or misrepresentation of facts is prohibited by the Company.

Business records and communications often become public and therefore the content of such records and communication must be professional, precise, and accurate, and

may not contain exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies. This applies equally to electronic communications (such as email), internal memos, and formal reports.

Company records must be maintained, stored and, when appropriate, destroyed in accordance with the Company's record retention policies and SOPs, and in compliance with applicable laws and regulations (e.g., drug regulatory, environmental, tax, employment, and trade regulations).

Under certain circumstances, such as litigation or governmental agency requests, the Company may be required to preserve documents and information beyond their normal retention period.

To understand which records must be preserved, or if a question arises as to the interpretation of a records and information retention policy, the Group General Counsel should be consulted.

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## Information management

### Intellectual property

Protecting Idorsia’s intellectual property is essential to maintaining a competitive advantage. Idorsia employees are expected to establish, support, maintain, and defend the Company’s intellectual property (including but not limited to patents, patent applications, trade secrets, trade names, trademarks, service marks, and copyrights) in a manner that protects the highly sensitive nature of the information and its commercial value to Idorsia.

### Confidentiality

Confidential information includes information about Idorsia operations, performance, technology, products, or employees that has not been publicly disclosed by an authorized spokesperson of the Company or is not available from public sources. Protecting confidential information is critical to Idorsia’s competitive edge and is every employee’s responsibility.

### Types of confidential information include:

- Research and scientific data
- Clinical study information
- Technical designs and processes
- Manufacturing designs and processes
- Financial records and data
- Marketing and business plans
- Unpublished patent applications
- Information that would enable a competitor to gain a competitive advantage
- Information that may influence Idorsia’s share value

or disclose another company’s confidential information unless it was legally obtained by Idorsia. Confidential information rightfully provided to Idorsia must be protected and may not be used or disclosed by an Idorsia employee to any other party except according to the terms under which it was provided.

Idorsia employees who are offered or come into possession of information belonging to another company or about another company, and who are unsure of its status, or believe it may be confidential, should consult the Group General Counsel.

### Confidential information that belongs to third parties

Providing Idorsia employees with information about other companies is acceptable only when the information is obtained lawfully (e.g., through the public domain). Idorsia employees are not to use

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## Privacy

Idorsia is committed to protecting the privacy and integrity of personal information in all business activities. Insofar as it is legally permissible, the Company may collect personal information; however, it will only collect such information for legitimate business purposes and retain it only as long as is necessary or required by law. In addition, Idorsia takes precautions to safeguard the security of personal information when it is collected, processed, stored, and transferred, and will provide notice and obtain consent prior to obtaining personal information, consistent with applicable laws and regulations.

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### What is personal information?

Personal information is any information that can be used, alone or in combination with other information, to identify a specific individual. It includes such information as an individual's name, birth date, gender, home and business addresses, social security number, identity card/passport numbers, driver's license number, financial account and credit card number, picture, relatives, telephone number, email address, and other document or electronic identifiers.



## Insider trading

All non-public information about the Company (or another company) must be considered confidential information. Confidential information that could affect the price of a stock (Idorsia's or another company's) or could be considered important by investors trading in a stock is commonly called "inside information". The use of "inside information" for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is illegal; doing so can result in fines and criminal prosecution both for the person who trades and for the person who divulges the information.

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### "Inside information" is material, non-public information that investors would consider relevant to making an investment decision.

Examples include:

- Ongoing negotiations of a merger, acquisition, licensing, or similar transaction
- Approval of new products
- Entry into significant new contracts
- Sales of assets
- Changes in management
- Earnings statements or forecasts



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### A joint venture partner with whom an Idorsia employee is working disclosed that they are on the verge of a major scientific breakthrough. Can the Idorsia employee purchase stock in our joint venture partner?

No, an Idorsia employee cannot purchase this stock until the first business day after the information is known to the public. Just as importantly, the Idorsia employee cannot provide this information to any other person (including but not limited to his/her spouse, children, relatives, friends, or close associates) who might directly or indirectly benefit personally from this confidential information.

There are very strict laws regarding the use of non-public information about public companies that include both civil and criminal penalties. When in doubt, do not take any action until you have discussed the matter with a member of the Idorsia Legal Department.

To avoid even the appearance of trading on inside information, certain Idorsia employees are restricted to specific times in which they can trade in Idorsia stock. Employees who believe they may be subject to these trading periods or have questions about a specific situation should consult with the Group General Counsel before trading.

Related Idorsia Policies: POL-000026: Information Technology (IT) Acceptable Use, POL-000071: Protection of Personal Data, POL-000048: Global Corporate Policy and Procedure on Insider Trading



# Clinical and scientific integrity



## Scientific integrity

Research integrity is fundamental to the scientific process and to Idorsia's ability to bring novel products to market.

Idorsia employees are expected to protect the integrity of the research and development process by ensuring that all research, including but not limited to non-clinical and clinical development, is conducted according to all applicable laws and regulations and to the generally accepted standards of the scientific community.

Scientific misconduct is prohibited. Examples of scientific misconduct include but are not limited to fabrication, falsification, or plagiarism in proposing, conducting, or reporting research. Scientific misconduct disregards the intellectual contributions and property of others, impedes the progress of research, and corrupts the scientific record.

## Interactions with healthcare professionals & promotional activities

Idorsia is committed to the appropriate use of its products and recognizes the importance of providing Healthcare Professionals (HCPs) with the critical information that they need to make fully informed prescribing decisions.

For the purposes of this Code, an HCP is any person or entity that interacts directly with patients and has a role in the diagnosis or treatment of the patient, or is licensed and permitted by law to prescribe drugs for medical use, or is in a position to arrange for or recommend the purchase or prescription or formulary placement of any Company product.

Interactions and communications undertaken on behalf of Idorsia must be focused on informing HCPs about the Company's products, providing scientific and educational information, and supporting medical education. Since Idorsia provides information through various channels, it is

critical that promotional interactions and communications are in full conformity with applicable approved product labeling and meet the highest professional, marketing, and promotional standards.

All promotional activities and interactions with HCPs must be conducted in a manner that is fairly balanced, scientifically rigorous, and compliant with applicable laws and regulations. The marketing and promotion of products for an unapproved use is illegal and is prohibited by the Company. Furthermore, it is Company policy to comply with all applicable laws and regulations prohibiting the offering or giving of kickbacks, bribes, or other improper inducements to HCPs. All representatives who are employed by or act on behalf of Idorsia and who visit HCPs must receive training about applicable laws, regulations, industry codes and Company policies governing appropriate interactions with HCPs.

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## Monitoring the safety, performance, & quality of products

Patient safety, through the optimal performance and quality of products, is fundamental to our Company's mission. Idorsia takes seriously its commitment to assure that our products have and maintain an acceptable risk-to-benefit profile when used in accordance with the product labeling and good medical practice. The Company performs extensive and robust non-clinical and clinical testing to identify the safety and tolerability profile of products and, once approved for use, the products are continuously monitored through the use of post-marketing surveillance and spontaneous reports from prescribers and consumers. It is the responsibility of all Idorsia employees to promptly report any adverse drug experiences that they become aware of that could be associated with an Idorsia product to the Company's Global Drug Safety Department.

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**An adverse drug event/experience is defined as any unfavorable and unintended sign, symptom, or disease associated with the use of the product irrespective of causal relationship.**

It also includes:

- A product quality defect
- Exposure during pregnancy or lactation
- Misuse, abuse, or overdose
- Medication errors (e.g., dispensing errors, maladministration, etc.)
- Overdose (whether intentional, accidental, or prescribed)
- Occupational exposure as a result of one's professional or non-professional occupation
- Reports of suspected falsified products
- Reports on any transmission of an infectious agent via the product/s
- Drug-drug or drug-food interactions
- Withdrawal symptoms
- Lack of effect or worsening of a pre-existing condition
- An unintended beneficial effect

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# Animal welfare



## Treatment of animals

Whenever possible, Idorsia is committed to the development and use of scientifically validated alternative testing methods that do not utilize animals. The Company works with regulatory authorities to increase the recognition and acceptance of alternative models that will not compromise patient safety or the effectiveness of medicines under development.

In those circumstances when it is necessary to use animals to conduct vital research, Idorsia acknowledges its responsibility to ensure that animals included in studies conducted on its behalf are treated with respect and with a high level of humane and ethical concern.

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Idorsia employees must work to prevent violations of this Code. The Company recognizes that in some instances it may be difficult to determine the correct answer to a particular situation. Since every situation that will arise cannot be anticipated and addressed directly in our Code of Business Conduct, it is important to remember that there are resources available to assist employees. The following points should be kept in mind:

- Ask yourself: What exactly am I being asked to do? Does it seem unethical, illegal, or improper?

- Ask first, act later: If you are unsure of what to do in a given situation, discuss the problem with your supervisor, or a member of the Human Resources or Legal departments, your local compliance champion, or the Corporate Compliance Office. This is the basic guidance for all situations.
- Seek help from other Company resources: In cases where you feel it is uncomfortable to discuss an issue with your supervisor, consult with a member of the Human Resources or Legal departments, your local compliance champion, or the Corporate Compliance Office. If you wish to remain anonymous, use the Company's Global Compliance Helpline at 0800 110 007 (for Switzerland), +41 58 844 0106 for outside Switzerland, or [compliance@Idorsia.com](mailto:compliance@Idorsia.com).
- You may report Code violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected to the extent that it is feasible. The Company does not permit retaliation of any kind against employees for reports of Code violations.

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# Reporting, investigation & enforcement

## Reporting/investigation procedures

Any employee who reasonably believes that there has been a violation of this Code must report it immediately to their supervisor, their local compliance champion, or the Corporate Compliance Office, or through the Company's anonymous Global Compliance Helpline.

If the violation is reported to the Compliance Office, it will promptly investigate the matter. The investigation will be handled discreetly and the information will be disclosed to others only on a "need to know" basis and/or as required by law. There will be no adverse action taken against employees who, in good faith, report violations of this Code of Business Conduct or who participate in the investigation. If the investigation leads to the conclusion that a violation of this Code has occurred, the Company will take appropriate corrective action.

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### What types of issues should be reported in accordance with this code of business conduct?

Examples of issues include:

- Misconduct regarding sales and marketing practices
- Fraudulent financial reporting
- Insider trading
- Harassment or discrimination
- Disclosure of confidential information
- Environment, health, and safety issues
- Data privacy violations



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## Procedures for submitting confidential, anonymous complaints regarding accounting, regulatory, & auditing matters

As an alternative to the procedures defined above, any employee who reasonably believes that there has been a violation of this Code caused by questionable accounting, financial or auditing matters, disclosure matters, potential violations of securities or regulatory laws, or fraud against stockholders, has the right to submit a confidential, anonymous complaint directly to the Group General Counsel/Group Compliance Officer of Idorsia. The complaint should be made in written form or through such other methods as are made available by the Company for such purposes, such as the Global Compliance Helpline and provide sufficient information so that a reasonable investigation can be conducted.

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### Who should be contacted to report a compliance concern?

Depending on the nature of the concern, there are several options for reporting a concern, including line management, the local compliance champion, the Corporate Compliance Office, and the Compliance Helpline.



#### The Code

Legal compliance & ethical practices

The workplace

Data & information policies

Clinical & scientific integrity

Animal welfare

Personal responsibility

**> Reporting, investigation, & enforcement**

## Violations of the idorsia code of business conduct

The Group General Counsel and/or Group Compliance Officer shall determine, or designate appropriate persons to determine, appropriate actions to be taken in the event of violations of our Code. In the event of a violation of the Code by a member of the Board of Directors or an Executive Officer of the Company, however, the Board of Directors shall determine the actions to be taken. Such disciplinary actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to the Code.

In determining what action is appropriate in a particular case, the Group General Counsel, Group Compliance Officer, or Board of Directors shall take into account all relevant information, including the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action, and whether or not the individual in question had committed other violations in the past.

Should there be a finding that a Director, officer, or employee has violated this Code, the Company will provide them with a written notice of its determination, as well as the nature of the disciplinary action to be taken (e.g., censure by the Board, demotion or re-assignment of the individual involved, suspension with or without pay or benefits, or termination of the individual's employment).

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## The corporate compliance office

The Corporate Compliance Office coordinates the business conduct and compliance programs, and is a resource to assist employees with answers to questions or interpretations of the Idorsia Code of Business Conduct and related issues. It is also a resource for supervisors in managing compliance issues. The Group Compliance Officer (GCO) is the chairman of the Corporate Compliance Office and reports directly to Idorsia's Nominating and Governance Committee. Members of the Compliance Office include:

Name	Responsibility	Phone	E-mail
Oliver Peinelt	Legal & Compliance	+41 61 558 12 42	oliver.peinelt@Idorsia.com
Olivier Lambert	QA/CGMP/GCP/GLP	+41 61 565 67 51	olivier.lambert@Idorsia.com
Alex Khatuntsev	Human Resources	+41 61 565 62 45	alex.khatuntsev@Idorsia.com

Idorsia recognizes the hard work and constant attention needed to maintain high ethical standards and compliance priorities in the workplace. Individual employee commitment to this Code of Business Conduct will demonstrate Idorsia's dedication to integrity, professionalism, quality, respect, and honesty.

Should you have any questions or require further clarification relative to any of the Sections contained within our Code, please do not hesitate to seek assistance from your supervisor/manager, your Human Resources contact, the Group General Counsel, or the Group Compliance Officer of Idorsia.

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If an employee is uncertain whom to contact, any of the individuals listed above may be contacted for assistance. Employees should contact these individuals to ask questions, raise issues or concerns, or report suspected violations; anonymously, if necessary.

Alleged compliance violations will be investigated. All employees are required to cooperate in any investigation. Failure to fully cooperate may result in disciplinary action, up to and including termination.

Corporate policies referred to in this policy and other generally applicable policies will be posted on Quatro, accessible via the Idorsia intranet, or can be obtained by calling the Corporate Compliance Office.

**Idorsia** is an independent biopharmaceutical company based on science and innovation. The company is specialized in the discovery and development of small molecules, to transform the horizon of therapeutic options. It is headquartered in Allschwil/Basel, Switzerland and is quoted on the SIX Swiss Exchange (tickersymbol: IDIA). All trademarks are legally protected by their respective owners.

**Disclaimer** This fact sheet has the sole purpose to provide members of the public with general information about the activities of Idorsia. The forward-looking statements in this fact sheet are based on current expectations and belief of company management, which are subject to numerous risks and uncertainties.

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## Financial Performance

Latest update:  
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