Communication is a key prerequisite for both reputation and stakeholder commitment. Idorsia makes every effort to ensure appropriate communication with all of our stakeholders; which include; employees, healthcare professionals, patient associations, scientists, alliance partners, our shareholders and the investment community in general, media, neighbors, authorities and governments.

A company’s success is clearly connected to its reputation and the engagement of its employees. Not only does a good reputation attract talented employees but it also helps establish relationships with business partners, create the right basis for investor interest, and last, but not least, it goes a long way to building confidence in a the company as a whole.

This policy underlines the priority Idorsia sets on communication. It establishes the framework procedures that define all communication activities occurring at Idorsia. It should be noted that while every effort has been made to comply with all legalities and regulations, should any part of this document conflict with local applicable legal positions, the latter shall take precedence.
Objective

Our communication teams and activities should:
• Support Idorsia’s strategic goals helping to further build a solid reputation and a strong, consistent corporate image.
• Take the lead in dealing with key topics with all stakeholders, which include; employees, healthcare professionals, patient associations, scientists, alliance partners, our shareholders and the investment community in general, media, neighbors, authorities and governments.
• Provide our stakeholders with timely, consistent information about decisions and activities taken by Idorsia and its entities worldwide to ensure fair disclosure.

Scope and applicability

This policy underlines the priority Idorsia sets on communication. It establishes the framework procedures that define all communication activities occurring at Idorsia. It should be noted that while every effort has been made to comply with all legalities and regulations, should any part of this document conflict with local applicable legal positions, the latter shall take precedence.

The Idorsia Communication Policy is applicable to all Idorsia employees worldwide.

Review and approval

• Investor Relations, Corporate Communications & Public Affairs, 01-JUN-17, signed
• Legal & Compliance, 01-JUN-17, signed
• CEO, 01-JUN-17, signed

1 Author, signs for correctness and completeness
2 (Only if applicable) Reviewer, signs for control of correctness and completeness
3 Approver, signs for the release of this document
Guiding principles

**Transparency**
Our goal is to be a company known for its open communication by proactively providing a regular flow of relevant information, thereby avoiding rumors, suspicion and mistrust resulting from concealment of information.

**Based on fact**
Our communication is based on facts from evidence and confirmed data. Any forward looking statements will be based on these facts. Our approach should not create misconceptions that could raise false expectations. This also means that Idorsia will not comment on rumors or third-party matters including competitors, and we do not speculate on the outcome of pending issues until such time as an official decision has been reached.

**Consistency**
It is essential to Idorsia’s reputation that all messages are in line with an agreed upon company position. To this end, we require our employees to direct inquiries or contact from: members of the investment community, news organizations and mass media (business, lay and science), the local community or governments to Corporate Communications (CC).

Statements made by Idorsia employees, regardless of position in the company, may be understood as being an official statement of the company’s stance on any particular issue. This is true whether the staff member is empowered to act officially on this matter or not. As a result, employees must not publicize facts, opinions, photos or videos about Idorsia in traditional mass media or in social media without consent by CC.

**Timeliness**
To achieve successful information management we must demonstrate openness to issues and address problems in a timely fashion as and when they occur. Idorsia’s communication professionals make sure that feedback is given in time to allow analysts or reporters to react.

**Equal treatment of audiences**
Idorsia treats all stakeholders equally when considering their information needs. Our goal therefore is to provide simultaneous, targeted dissemination of information and news relating to Idorsia. Exceptions may occur as a result of time-zone differences and/or to comply with legal requirements.
Respect for our business partners
Idorsia is working with several alliance partners and recognizes that they have commitments to their key stakeholders with respect to sharing information. Idorsia therefore commits to extend the same respect and courtesy to our partners’ stakeholders, as we do to our own, by coordinating all relevant communication activities. We expect reciprocity from our partners.

Our relationships with external vendors and suppliers constitute a unique competitive advantage. Use of the Idorsia brand with endorsements of products and services or third-party testimonials is only permitted with authorization from CC.

Lean communication
As in all other areas of the company, Idorsia’s communication activities are chosen by taking cost-benefit calculations into consideration and using natural resources responsibly. Where possible Idorsia will avoid printing of company documents and will distribute them by electronic means.

Retain competitive advantage
In order to retain a competitive advantage Idorsia reserves the right to disseminate information until disclosure is mandatory or the timing is considered appropriate. Budget figures are not disclosed, instead, broad guidelines and general information regarding future performance are provided to align expectations.

Defense of our reputation
Idorsia’s communication efforts aim to strengthen its reputation in the public domain. Where Idorsia’s reputation is unduly called into question, the company will take appropriate action to reinforce its position.
Idorsia’s communication teams

In order to communicate according to Idorsia’s guiding principles the company has established specific teams to address all stakeholders. The teams established are; Corporate Communications (CC), Investor Relations (IR), Public Affairs (PA), Global Scientific Information (GSI) and some representatives from Clinical Development (CD). Each team is focused upon communication strategies and their implementation tailored to the specific needs of their respective stakeholders as detailed below.

**Corporate communications (cc)**

**Communication objective**
- To clearly communicate Idorsia’s vision & strategy
- To further build a strong corporate brand and solid reputation
- To communicate consistently with all internal and external key stakeholders
- To support Idorsia’s management in their business goals – Exchange information globally through a strong network of communication correspondents

**Key stakeholders**
- Idorsia employees
- Mass media
- Public (Communities)

**Investor relations (IR)**

**Communication objective**
- To clearly communicate Idorsia’s vision and strategy
- To further build a strong corporate brand and solid reputation
- To ensure fair disclosure
- To allow for an appropriate external understanding of the company’s value and its value creation process

**Key stakeholders**
- Investors
- Investment analysts
- Financial media

**Public affairs (PA)**

**Communication objective**
- To clearly communicate Idorsia’s vision and strategy
- To generate a network with decision makers in politics and administration
- To generate fundamental understanding of the Idorsia business needs

**Key stakeholders**
- Healthcare professionals
- Pharmacists
- Patient organizations
- Patients and caregivers

**Global scientific information (GSI)**

**Communication objective**
- Provide a global service to respond to inquiries about Idorsia’s marketed medicinal products and clinical development compounds
- Respond to critical issues, concerns and information needs that have been raised by key stakeholders
- Develop communication tools such as question and answer documents for relevant critical issues

**Key stakeholders**
- Administrative Bodies (local/regional/national/international)
- Political Bodies
- Industry Associations
Clinical development (CD)

Communication objective
• Ensure appropriate and timely information is passed to regulatory authorities
• Ensure accurate and consistent exchange of information with Investigators and the external clinical teams involved in clinical trials
• Communicates all necessary clinical research information and study results to CC for disclosure
• Ensure appropriate and timely information concerning clinical research and study results is shared with the scientific community*

*Also see: Policy on the Public Disclosure of Clinical Research Information & Policy on Publication of Scientific Information

Specific communication challenges

Idorsia defines information as being relevant when such information is considered strategic or tactical or if said information could be regarded as important by internal or external target audiences. Relevant information can be either price- or non-price-sensitive.

Price-sensitive information
Idorsia is headquartered in Switzerland and is listed on the SIX Swiss Exchange, as such, it is subject to laws and regulations that govern price-sensitive information (insider knowledge, ad hoc publicity), insider dealing, market manipulation and market abuse. Price-sensitive information is generally regarded as important information a reasonable investor would rely on before trading in securities of a company and / or information which is expected to have a considerable impact on the company’s share price.

Guidance regarding price-sensitive information can be found on www.six-exchange-regulation.com. The key criterion in deciding whether new information is ex-ante price-sensitive is established in Article 53 of the Listing Rules as well as in Articles 3 and 4 of the Directive Ad hoc Publicity of the SIX Swiss Exchange.

Any person who is in possession of potentially price-sensitive information must immediately inform Idorsia’s Disclosure Committee, via CC. The CEO makes a final ruling whether the new information is price-sensitive or not based on the recommendation of the Disclosure Committee. CC must then ensure the information is dealt with appropriately.

CC and IR&PA will develop all communication activities & plans for each individual case concerning price-sensitive information that transpires. The activity and plans must be approved by the CEO.
It is imperative that confidentiality is maintained prior to the publication of any price-sensitive information. If, for any reason, price-sensitive information is released inappropriately (‘leaked’), the CEO, with CC and IR&PA will decide upon the actions necessary. These plans will include the immediate official release of the price sensitive information concerned.

Simultaneous disclosure of news and information, as specified in the guiding principles, will be considered standard practice. This also complies with SIX listing rules governing equal treatment of all stakeholders. Idorsia distributes information appropriately through (but not limited to) media releases, investor updates, internal e-mails and simultaneous publication on Idorsia’s website and intranet.

The use or dissemination of price sensitive information by Idorsia staff is strictly forbidden. During specifically defined periods “Block periods” trading in Idorsia securities by Idorsia staff is prohibited, Block periods, are defined in Idorsia’s Global Corporate Policy and Procedure on Insider Trading. The relevant dates are published on the corporate intranet under “Insider Trading Policy” and communicated beforehand to all employees via e-mail.

**Relevant but non-price sensitive information**
Idorsia will communicate information that it feels is relevant to stakeholders although not share price-sensitive. This information can comprise key aspects of the Idorsia’s strategy, culture or corporate responsibility.

Any information regarding Idorsia to be communicated by a department, team, function or affiliate, must first be conveyed to CC. The information will be reviewed by CC and the appropriate member of management to determine whether and how this information will be disseminated.

Idorsia will communicate scientific findings once all the facts have been thoroughly assessed by our scientific experts and when all information is available to provide a considered opinion. Idorsia will not speculate on an individual unsupported observation.

**Issues and crises**
Idorsia is an innovative global player in the healthcare business, with a host of related activities which are potentially risky. Despite precautions taken to minimize the risks, situations may occasionally arise which could be unfavorably perceived by some of our stakeholders.

Critical situations are managed proactively and with transparency when considered relevant to stakeholders of Idorsia. The preparation of communication material relating to the specific situation(s) is generally led by CC together with the team that is most familiar with the details. Documentation which is prepared includes, but is not limited to, press releases, positioning statements and Q&A documents.

The speed of modern media and information exchange modalities allows for rapid global distribution of information. For this reason, the same rules apply to all critical situations that occur anywhere within Idorsia. No difference should be applied to issues that may be considered ‘local’. Idorsia must respond appropriately to all events. It is imperative that CC is informed and kept up-to-date with all alerts and documentation regarding critical situations. The sender of any information relating to these situations is responsible for ensuring that the information has been received. CC and the relevant members of management will assess the severity of the situation and any action that is required as a result.

Decisions regarding further handling and disclosure of this information will be made exclusively by the CEO in consultation with members of management.
Key communication channels

The reception and understanding of information is heavily dependent upon the channel used to distribute the information. Selecting the most appropriate mode of delivery will depend upon many factors including the profile of the audience, time constraints, legal regulations and the content to be delivered.

Idorsia understands that its employees engage in social media activities. Where their engagement concerns Idorsia, its business interests or its partners, we trust and expect personal responsibility of employees using any kind of online publishing and discussion, including blogs, wiki’s, file sharing, user-generated video and audio, virtual worlds and social networks.

Corporate publications
Corporate Publications are considered any publication containing information on Idorsia as a company. A document that describes Idorsia in a way that differs from approved material made available on www.Idorsia.com must be submitted and approved by CC. All publications must be produced in accordance with Idorsia’s corporate design guidelines.

Scientific publications
Idorsia has defined in the policy for scientific publications its commitment to scientific disclosure. It is applicable to all scientific, technical and medical publications supported by Idorsia and/or related to Idorsia-sponsored non-clinical and clinical research (refer to Policy for Scientific Publications).

Disclosure of clinical research information
Idorsia is committed to publicly disclosing information about clinical research in a timely manner as this information is often important and critical to the medical profession, patients, and the public. The respective policy reflects Idorsia’s commitment to ethical, open and transparent communication of information relating to Idorsia-sponsored clinical research that evaluates Idorsia’s medicines, in line with country-specific legal requirements and international standards regarding public disclosure of clinical research (also see Policy on the Public Disclosure of Clinical Research Information).
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 (ticker symbol: 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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Communication policy
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