

POLICY – WHISTLEBLOWER PROTECTION

Objective

To outline the company's whistleblower protection policy for serious and sensitive issues as defined in this policy.

Scope & Applicability

This policy applies to the entire Idorsia Group

Content

General

Idorsia and its wholly-owned subsidiaries (collectively, the "Company") are committed to preventing adverse employment action of any kind against an employee of the Company for lawfully reporting information about serious and sensitive issues involving the following:

- fraudulent activities within the Company (including wire fraud, mail fraud and bank fraud),
- questionable accounting, internal accounting controls or auditing matters of the Company,
- misconduct or illegal behavior regarding marketing activities, inducement of prescriptions etc., and
- conduct by executives of the Company that violate the Company's Policy on Ethical Conduct, or that cause reports and other public disclosures by the Company that are not full, fair and accurate.

To advance this commitment, the Company has adopted this Whistleblower Protection Policy ("this Policy").

Prohibition of Adverse Employment Action

It is a violation of this Policy for any officer, director, employee, contractor, subcontractor, or agent of the Company to take any adverse employment action or in any other manner discriminate against an employee of the Company for engaging in any conduct protected by this Policy. For the purposes of this Policy, adverse employment action includes terminating, demoting, suspending, threatening or harassing an employee of the Company.

Employee Conduct that is Protected under this Policy

An employee of the company is protected under this Policy from adverse employment action of any kind for:

- legitimately reporting, or causing to be reported, to Idorsia's Compliance Office, Legal Department, Human Resources Department or local compliance representatives, or
- cooperating or assisting in an already initiated internal or external investigation regarding,;
- alleged fraudulent activity including wire, mail or bank fraud or securities fraud against stockholders,;

- alleged matters related to any questionable accounting or auditing issues, including, without

limitation, the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording and maintaining of financial records of the Company;
- deficiencies in or noncompliance with the Company's internal accounting controls;
- alleged misrepresentations or false statements to or by a senior officer or accountant of the Company regarding a matter contained in the financial records, financial reports or audit reports of the Company; or
- alleged deviations from full and fair reporting of the Company's financial condition.
- alleged misconduct or illegal behavior regarding marketing activities, inducement of prescriptions etc.,
- alleged conduct by executives of the Company that violate the Company's Policy on Ethical Conduct, or that cause reports and other public disclosures by the Company that are not full, fair and accurate.

Reporting and Investigating Employee Complaints

The intended use of this Whistle Blower procedure is for serious and sensitive issues.

Matters described above should be reported to the Corporate Compliance Office at compliance@ldorsia.com or alternatively for written documents: Idorsia Ltd, Idorsia Compliance Office, Hegenheimermattweg 91, 4123 Allschwil.

The Corporate Compliance Office consists of the following persons:

Name Responsibility

Oliver Peinelt, Group General Counsel/Group Compliance Officer

Alex Khatuntsev, Head Global Human Resources

Olivier Lambert, Head of Drug Development

The recipient in the Corporate Compliance Office should promptly report the matter to the Group Compliance Officer. The Group Compliance Officer should determine next steps, such as additional reporting requirements and/or investigative steps. The actions taken will depend on the nature of the matter reported. Initial inquiries may be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed action without the need for investigation.

Please note: Employment-related concerns should continue to be reported through normal channels such as supervisors, local HR representatives, or to the Head Global Human Resources.

Report to Complainant

Whether reported to Idorsia personnel or through the hotline, within a reasonable time period, as appropriate the complainant will be given the opportunity to receive follow-up on his/her report, including

- Acknowledging that the report was received;
- Indicating how the matter will be dealt with;

- Giving an estimate of the time that it will take for a final response;
- Informing him/her whether initial inquiries have been made;
- Informing him/her whether further investigations will follow, and if not, why not.

Further Information

The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant.

Information as appropriate and subject to legal constraints, the complainant will receive information about the outcome of any investigation regarding his report.

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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Latest update: June 2017

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