

Code of Conduct

INTEGRITY
IN ACTION



ALEXION[®]

RARE INSPIRATION. CHANGING LIVES.

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**RARE
INSPIRATION.
CHANGING
LIVES.**

MESSAGE from our CEO:



Dear Colleagues,

Doing the right thing in every moment—big, small, and those minutes in between—defines who we are as an organization and how we are viewed by the stakeholders counting on us.

Integrity is anchored in our culture because we know lives are at stake. This is a responsibility I take personally and have the highest expectations of those that work for and with Alexion. We must always honor the trust that patients and other stakeholders have placed in us.

The *Integrity in Action Code of Conduct* (“the Code”) serves as a framework for acting with integrity and connects our values to our business conduct. It provides information, resources and the tools necessary to behave ethically and in compliance with the law. Sometimes, we will face situations where the right thing to do is not obvious. While the Code cannot answer every question, it can show you where to go for guidance when the answer is not clear. We are expected to tackle gray-area questions as a team to ensure we are looking at every point of view to take informed actions.

Please familiarize yourself with the Code and understand how it relates to our day-to-day activities. Acting with integrity begins with speaking up. Each of us has the obligation to speak up if we see anything that compromises our integrity. Integrity is essential to everything we do.

Kind regards,




Ludwig Hantson
Chief Executive Officer

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**RARE INSPIRATION.
CHANGING LIVES.**

A young woman with curly brown hair, wearing a white lab coat, is seated and looking towards an older woman with short blonde hair wearing blue scrubs. The older woman is seen from the back/side, looking towards the younger woman. They appear to be in a clinical or office setting with a bulletin board in the background.

Every day, we strive to live up to the expectations of patients, physicians, and ourselves, and to earn the trust of our communities. We believe that each of us is accountable for achieving our commitments with the highest standards of ethics and integrity, so that we can deliver on behalf of the patients who rely on us.

INTEGRITY IN ACTION

Putting integrity in action means practicing ethical and honest behaviors every day and in every situation. Integrity is more than a set of rules to follow. It is something within us that guides us to do what is right. It is not always easy or comfortable. Rather, it is about holding on to our values and beliefs in all the actions we take.



OUR VALUES

Patients are our Guiding Star and we serve them every day with our hearts and minds. By operating with the highest standards of ethics and integrity, we continue to build trust with patients and the marketplace. Our Culture Values are the driving forces that propel us to do better and be better. They help us operate in a complex environment as we bring our innovative treatments to patients in need around the world. Despite this complexity, each and every one of us commits to doing things the right way. Our values are not simply ideas to us, they are a vital compass in our daily work.




OUR CODE

Our “Code” serves as the foundation of our compliance program and supports the policies and procedures that we uphold every day. Our Code is one way we put our integrity in action and gives us the guidance to make choices and decisions that are ethical.

Our Code starts with our Culture Values and sets expectations for our behavior. It is a resource that helps guide us on how we interact with others and make informed, ethical decisions. It also directs us to relevant policies and other helpful tools for more information.

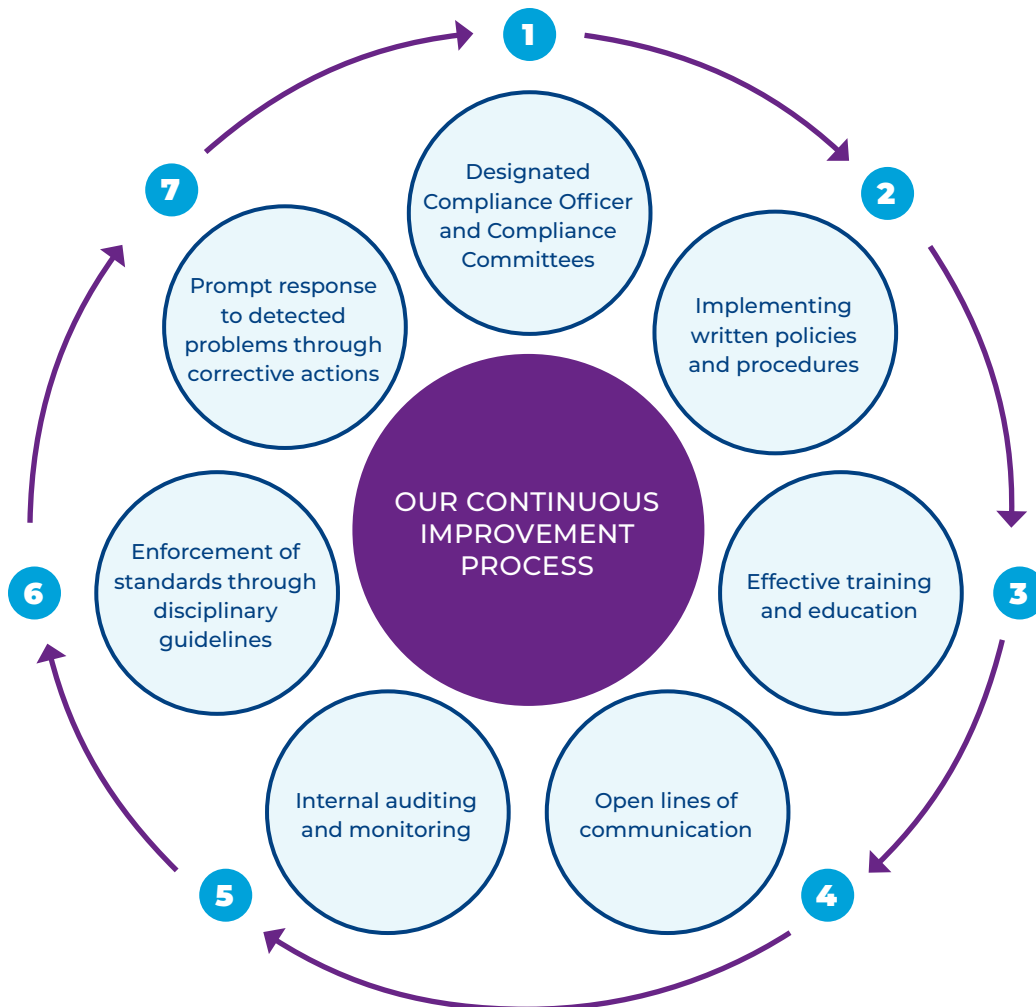
We are expected to be familiar with the information contained in this Code as well as the relevant policies, procedures, and laws related to our roles. Our Code applies globally, including to our Board of Directors, officers, and colleagues. Additionally, we expect all business partners, third parties, and vendors to embrace similar values, act in a way that is consistent with our Code, and abide by our *Vendor Code of Conduct*.


Keep in mind, our Code cannot address every situation we may possibly face in our everyday work. We must all use good judgment to guide our actions.

 Reach out to your Manager or to the Human Resources, Global Compliance, or Legal Departments with questions.

OUR COMPLIANCE PROGRAM

Our compliance program is designed to foster a culture of quality and compliance and prevent or detect violations of our policies or procedures. It incorporates the seven fundamental elements of an effective compliance program as defined by the Office of Inspector General for the U.S. Department of Health and Human Services:





Non-compliance with our Code can have serious consequences for our Company, our colleagues, our investors, and for patients, customers and the public. Non-compliance can impact:

Our Company

- Damage our reputation
 - Lead to prosecution or fines
 - Result in disclosure to government agencies
 - Lead to loss of business
-

Our Investors

- Lead to loss of confidence in Alexion and our products
 - Result in loss of investment value
 - Damage our reputation for good corporate governance
-

Patients, Customers and the Public

- Compromise product safety or efficacy
- Raise environmental risk
- Lead to loss of good faith and trust in Alexion

Global Compliance

Global Compliance is available to support you if you have a question, need to raise a concern, or need to report a possible violation of our standards. There are various ways that Global Compliance can provide you with guidance and assist with further information.

Contact Global Compliance:

- by email: compliance@alexion.com
- by phone: 1-475-230-STAR (7827)
- by website: www.Alexion.com/EthicsHotline
- by mail or in-person: 121 Seaport Boulevard, Suite 400, Boston, Massachusetts 02210

Ethics Hotline

The Ethics Hotline allows us to report a concern or get advice on Compliance or HR issues and can be done anonymously. The hotline is available by phone or by web-reporting tool 24 hours a day, 7 days a week, 365 days a year, and is operated by specially trained third-party representatives.

www.Alexion.com/EthicsHotline

Visit the Ethics Hotline website for all country-specific phone numbers



SPEAK UP

We promote a culture of open and honest communication. We are encouraged to ask questions and raise concerns, even with difficult issues. We have a duty to report anything that compromises (or has the potential to compromise) our integrity as individuals or as a company. By speaking up early, we can clarify ambiguity or address concerns before they evolve into more serious matters.

All Managers are responsible for supporting this culture by creating an environment where integrity is recognized and valued. We maintain an “open door” for direct reports and other colleagues to raise concerns or questions. While it often makes sense to first approach your Manager about concerns or questions, we have other avenues available:

- Your next level Manager
- Your business unit head
- Human Resources
- Legal
- Global Compliance
- Ethics Hotline



Read more in our *Speak Up* brochure, or contact the Global Compliance Department with questions.

ANTI-RETALIATION

We trust, value, and respect each other. Retaliation against any colleague who asks a question, raises a concern, or reports misconduct is strictly prohibited. We have a right to report concerns in good faith without fear of harassment, retaliation, or any adverse employment consequences.

Retaliation can take many forms. Examples of retaliation include:

- Threats, intimidation, mistreatment, or harassment
- Discrimination or exclusion
- Unwarranted discipline
- Demotion or reassignment
- Suspension or termination



Contact the Human Resources or Global Compliance Departments with questions.

CONFIDENTIALITY

It is essential we feel secure to ask questions and report concerns. Confidentiality is a priority when concerns and compliance issues are raised. Every effort will be made to maintain confidentiality to the fullest extent possible. However, there may be instances when, because of the nature of an investigation or certain legal requirements, it may be necessary to disclose your identity to individuals who are on a need to know basis. The Ethics Hotline allows us to anonymously report a concern, ask a question, or seek advice if confidentiality is a concern.






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**RARE INSPIRATION.
CHANGING LIVES.**



We put patients at the heart of decisions we make. We seek to understand patients' journeys and with our passion and persistence, help each patient find answers and deliver transformative therapies that change lives. We collaborate and partner with the world around us to create value for patients.



PRODUCT QUALITY AND PATIENT SAFETY

The safety and quality of our products and the safety and well-being of patients are our top priorities. At Alexion, we say “Quality is for Everyone.” We are dedicated to delivering products that meet or exceed the highest standards.

We monitor for **Product Complaints** and **Pharmacovigilance Events** that may be experienced during normal use of our products, and it is our responsibility to report these as soon as possible. We are committed to quality and product improvements whenever possible.

Product Complaints

Product Complaints include any communication that alleges deficiencies related to the identity, quality, durability, reliability, usability, safety, effectiveness, or performance of a product or clinical trial material and/or its packaging components after it is released for distribution that affects the performance of such product. Product Complaints should be reported as soon as possible:

- by email: ProductComplaints@Alexion.com
- by direct contact: Local Quality Representative
- via Atrium: Quick Links

Pharmacovigilance (PV) Events

PV events include both adverse events and special situations. An adverse event is any unfavorable or unintended sign, symptom, or disease associated with the use of a medicinal product, whether or not it is considered related to the medicinal product. Special situations include events such as product abuse, product misuse, off label use, and pregnancy. PV events must be reported to Global Drug Safety as soon as possible, but at the least, within 24 hours, even when there is minimal information:

- by email: AdverseEventReporting@Alexion.com
- by phone: 1-844-259-6783
- by fax: 1-203-439-9347
- by Direct Contact: Local Safety Officer (LSO)
- via Atrium: PV Event Reporting Tool and Quick Links



Our Commitments:

- *Deliver safe and effective products that meet or exceed the requirements of patients and customers*
- *Comply with all applicable regulatory requirements*
- *Operate a Quality Management System and improve our systems and processes*
- *Ensure the integrity of our data*
- *Uphold our individual and collective accountability for quality*

 Read more in our [Quality Policy](#), or contact the Regulatory, Quality, Legal, or Global Compliance Departments with questions.

INTERACTIONS WITH PATIENTS AND PATIENT ORGANIZATIONS

Interacting with patients and patient organizations can give us the opportunity to understand how to better serve patients. In these interactions, we are ambassadors of the Company and are always respectful, honest, and professional.

Our Commitments:

- ➔ *Interact with patients only as allowed by our policies and local laws*
- ➔ *Respect patients and the patient-physician relationship*
- ➔ *Protect the privacy of patients' personal and health information*
- ➔ *Ensure that all interactions with patient organizations are educational, accurate and consistent with applicable Company policies and with legal and regulatory standards*



Read more in our *U.S. Commercial Reference Guide*, *Global Medical Affairs Reference Guide*, and *Global Interactions with Patient Advocacy Organizations Policy*, or contact the Global Compliance Department with questions.



INTERACTIONS WITH HEALTHCARE PROFESSIONALS AND THE MARKETPLACE

We are committed to promoting our products and services based on patient need and in a balanced, transparent manner, grounded in medical and scientific fact. We respect the key role that healthcare professionals play in patient care and avoid unduly influencing their healthcare decisions. We are committed to the highest standards of integrity and compliance with applicable laws and regulations in every aspect of our relationship with healthcare professionals and the marketplace.

There are many ways that we may interact with healthcare professionals as part of our job responsibilities, including through scientific, medical, educational, or promotional engagements. We will not engage in illegal or unfair activities such as providing false or misleading advertising, offering bribes to influence a decision, or making unsubstantiated claims. We must ensure promotional communications and materials comply with both globally-reaching and locally-relevant laws, including applicable standards addressing substantiation, scientific rigor and fair balance.

CODE FACT:

We must ensure that any meal or other item of value provided to healthcare professionals is documented in a manner that ensures transparency and compliance with applicable laws.

Our Commitments:

- Avoid interfering with a healthcare professional's independent decisions about patient care
- Provide product information that is accurate and not misleading
- Ensure promotional communications and materials in line with local regulatory authority approved uses
- Ensure compliance with local relevant laws, including applicable standards addressing substantiation, scientific rigor and fair balance
- Do not make unsubstantiated claims



Read more in our [Global Medical Affairs Reference Guide](#), [Anti-Bribery/Anti-Corruption Policy and Procedures](#), [U.S. Commercial Reference Guide](#), and [Promotional and Medical Materials Review Policy](#), or contact the Regulatory, Medical, Legal, or Global Compliance Departments with questions.

CORPORATE SOCIAL RESPONSIBILITY

Corporate Social Responsibility (CSR) at Alexion supports our mission to transform the lives of people affected by rare and devastating diseases while creating value for all our stakeholders. We aspire to be a leader in this space by viewing CSR through the lens of “Shared Value,” the concept that companies can help solve social issues while creating financial value for its shareholders. Our CSR-STAR platform represents our comprehensive approach to environmental, social and governance topics impacting our business and our stakeholders.



Read more at www.Alexion.com/Responsibility

SERVE

Serve our communities and sustain our planet by investing in our communities and shared planet in support of those who depend on us today and for generations that follow

TRANSFORM

Transform patient lives by seeking to understand patient journeys, find answers, and collaborate to deliver access to therapies that change lives

ADVANCE

Advance our people and our company by becoming the most rewarding place to work, embracing diversity and governing and managing our business to return value to our stakeholders

REDEFINE

Redefine what it means to live with a rare disease by working to advance healthcare through innovative diagnostics and proactive transparency



COMMUNITY ENGAGEMENT AND EXTERNAL COMMITMENT

We support various initiatives and activities that provide medical education or benefit patients and our local communities.

Grants provide funding to eligible third-party entities to support independent and unsolicited programs or studies with bona fide and specific purposes to help patients. We receive no tangible benefit from these activities. All Grant requests must be submitted directly by the requesting organization through the Grants Portal.

Charitable Contributions & Donations support worthy groups and causes in the localities in which we work. They provide funding, medical equipment, or in kind donations to a third party, such as a hospital, university, or registered charitable organization under local law. We receive no tangible benefit from these activities.

Corporate Sponsorships provide funding to a third-party entity in exchange for the opportunity to promote our products, brands, or corporate interests, or in exchange for some other tangible benefit in compliance with policy and local laws.

Global Access to Medicine (GATM) is a program that aims to provide access to our therapies, cover temporary gaps in funded access to treatment, and enable patients to access investigational therapies that are actively being explored by us. Registration information can be found on the My Access Programs website. <https://myaccessprograms.parexel.com>

Alexion Access Foundation (AAF) recognizes that access to medicines can be challenging and is committed to supporting programs that enable eligible patients to receive our therapies. For example, AAF was established to help patients in the U.S. who do not have insurance, access to insurance, and lack the means for obtaining Alexion medicines.

Our Commitments:

- *Ensure that these key initiatives comply with all applicable Company policies*
- *Avoid linking these activities, in any way, with the use or recommendation of our products*



Read more in our *Funding for Charitable Contributions Policy, Funding Healthcare Sponsorships, Exhibits and Displays Policy, Funding for Medical Education Policy, Funding for Investigator-Sponsored Research Policy, Funding for Patient Advocacy Organizations Policy, and Anti-Bribery/Anti-Corruption Policy and Procedures*, or contact the Global Compliance Department with questions.



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**RARE INSPIRATION.
CHANGING LIVES.**

A woman in a dark blue business suit and a male doctor in blue scrubs and a white lab coat are walking in a hospital hallway. The woman is on the left, smiling and looking towards the doctor. The doctor is on the right, looking down at something in his hands. The hallway has a blurred background with lights on the ceiling.

We embrace compliance and quality as essential to everything we do. We build trust and earn credibility by doing things the right way. We are all leaders and accountable to each other, patients, customers, stakeholders and shareholders.



HEALTHCARE LAWS AND REGULATORY REQUIREMENTS

We proudly operate and do business globally. Our global reach makes us subject to many laws and regulations that govern all aspects of our business, including interactions with patients, caregivers, customers, and healthcare professionals. The laws and regulatory requirements of one country may apply to activities in another country. In the event that local laws and regulatory requirements differ from our policy, the stricter requirements generally apply.

Our Commitments:

- *Understand and comply with all healthcare laws and regulatory requirements that are applicable to our roles and responsibilities*
- *Obtain all required licenses and approvals*
- *Know our business partners and ensure they are subject to due diligence screening*

 Contact the Legal or Global Compliance Departments with questions.

ANTI-BRIBERY AND ANTI-CORRUPTION

We have a zero-tolerance policy towards bribery and corruption. Alexion prohibits anyone acting on behalf of the Company from offering, giving, requesting, accepting or receiving a bribe. We cannot offer or give anything of value to anyone, including vendors, suppliers, healthcare professionals, patients, or government officials, to improperly influence their decisions.

A **Government Official** is any individual who works for a government-owned or controlled institution. It is important to note that in some regions, healthcare professionals can often be considered government officials. This can include a doctor working in a state hospital or an individual serving as a member of a healthcare policy committee that is advising the government. Refer to our *Anti-Bribery/Anti-Corruption Policy and Procedures* for more information about government officials.

Third parties acting on our behalf are subject to our policies, procedures and all relevant laws we follow. We must avoid actions that could even suggest improper influence and never try to do anything through a third party that we cannot do ourselves.

Bribery and Corruption Laws

We are responsible for following all global laws.

U.S. Foreign Corrupt Practices Act (FCPA)

Regulates U.S. companies doing business abroad. It makes it illegal to directly or indirectly give or offer anything of value to a non-U.S. government official to improperly influence the official or to gain an improper business advantage. The FCPA also makes it illegal to inaccurately record transactions in our books and records.

U.K. Bribery Act 2010 (U.K. Bribery Act)

Prohibits bribery of government officials. It also criminalizes commercial – private sector – bribery.

U.S. Federal Anti-Kickback Statute

Prohibits offering anything of value (whether in cash or in kind) that is intended to influence an individual's decision to recommend, prescribe, endorse or purchase a healthcare product or service that is reimbursed by a federal healthcare program, such as Medicare and Medicaid.

CODE FACT:

Penalties for violating anti-bribery and anti-corruption laws can be severe, both to the Company and to us as individuals.



The FCPA and U.K. Bribery Act apply to all of our colleagues, regardless of where you operate. In addition, Alexion has voluntarily agreed to abide by restrictions contained in various local pharmaceutical industry codes, which may limit our interactions with healthcare professionals.

Our Commitments:

- Comply with all applicable anti-corruption laws
- Do not offer or accept bribes, kickbacks or any other kind of improper payment, including facilitation payments
- Keep accurate books and records so that payments are honestly described and Company funds are not used for unlawful purposes.



Read more in our [Anti-Bribery/Anti-Corruption Policy and Procedures](#) and the [U.S. Commercial Reference Guide](#), or contact your Manager or the Global Compliance Department with questions.

ACCURATE BUSINESS RECORDS

We are committed to transparency and to making full, accurate, timely, and understandable disclosures about our business. Our books, records, and accounts must accurately and fairly reflect all of the Company's dealings and transactions with the appropriate level of detail. We must never conceal or confuse our records in any way or make false or misleading entries.



We must not omit relevant information, make an inaccurate representation (whether in a document or verbally), or establish any undisclosed or unrecorded funds or assets for any purpose.

Our Commitments:

- Record information clearly and accurately
- Only sign documents that we are authorized to sign and believe to be accurate and truthful
- Make true or accurate entries or approve appropriately recorded funds or assets
- Make payments with appropriate supporting documentation
- Cooperate fully with internal and external audits and related requests



Contact the Finance Department with questions.



CONFLICTS OF INTEREST

Each of us must avoid any situation in which our personal or financial interests might cause our business loyalties to be divided. In order to uphold our Company's reputation for acting with integrity, we must be alert to any situation that may create a conflict of interest or the appearance of a conflict.

A conflict of interest occurs when we have a personal or financial relationship or political interest that can interfere with our responsibility to act in the best interest of the Company, or when we use our position at the Company for our personal gain. Some common examples of conflicts of interest include:

- **Employment Opportunities:** Offering an employment opportunity to a relative or close personal friend
- **Corporate Opportunities:** Taking advantage of business or investment information that is gained through the course of performing our duties
- **Personal Relationships:** Recommending or working with third parties who are owned, controlled by, or employ our relatives or close personal friends
- **Outside Employment:** Taking on outside employment that may interfere or improperly influence our work actions or decisions
- **Gifts, Meals, and Entertainment:** Accepting certain gifts, meals, and entertainment from entities that do business or seek to do business with the Company
- **Personal Investments:** Investing in any of our vendors, suppliers, or business partners, unless the securities of the entity in question are publicly traded or otherwise acceptable according to our policies and procedures
- **Intellectual Property:** Participating in any business that would involve developing any work, process, or invention that is in the same area as the work performed by the Company or that competes with or relates to our present or anticipated business

Our Commitments:

- Avoid situations or activities that could create an actual, potential, or perceived conflict of interest
- Disclose any activities, investments, transactions, interactions or relationships that could create an actual, potential, or perceived conflict of interest



Read more in our [Conflicts of Interest Policy](#).



INSIDER TRADING

In the course of performing our duties, we may learn and be given access to “inside information,” or material non-public information, about the Company or other publicly traded companies. Buying or selling securities, such as stocks, bonds, or options based on information that has not been publicly announced is considered insider trading and is prohibited by both Company policy and law. Disclosing such inside information to others who then use the information to buy or sell securities is also prohibited.


Material Non-Public Information includes any information that a reasonable investor would consider important when deciding whether to buy, sell, or hold a security. Information is “non-public” until it is shared with enough time for investors to evaluate the information.

Examples of material non-public information may include:

- Large business contracts
- Drug approvals
- Financial results
- Potential mergers or acquisitions

Our Commitments:

- Do not buy or sell Company securities or any other publicly traded securities on the basis of material nonpublic information
- Avoid sharing material non-public information with any person outside the Company
- Avoid short sales, puts, calls, hedging transactions, margin accounts, pledges or other derivative transactions related to Alexion securities
- Only release material non-public information with prior approval by our Legal Department

 Read more in our [Policy Statement Regarding Company Information and Transactions in Company Securities](#), or contact the Legal Department with questions.

GLOBAL TRADE CONTROLS

As an international company that does business globally, we are responsible for knowing and complying with all global trade control laws. Violations of global trade control laws are not only harmful to our reputation but can also lead to significant fines, penalties, and criminal liability for the Company and potentially any colleague involved.

Our Commitments:

- *Know our business partners and final destination of our products*
- *Obtain required licenses and approvals*
- *Accurately document all import, export, and customs records*
- *Ensure third parties are subject to due diligence screening*
- *Seek guidance from the Legal Department to ensure we comply with all trade laws*

 Contact the Legal Department with questions.

POLITICAL ACTIVITIES

Expressing our political views and being involved in political activities as individuals is encouraged at Alexion. However, as laws in many countries prohibit or set limits on corporate contributions to political parties and candidates, we must participate in any political activities only as individuals.

Our Commitments:

- *Ensure that your personal political opinions and activities are not viewed as those of the Company*
- *Not use Company time, property, money or equipment for personal political activities*
- *Only engage in lobbying activities in coordination with Global Government Affairs*

 Contact the Global Government Affairs or Legal Departments with questions.






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**RARE INSPIRATION.
CHANGING LIVES.**



We trust, value, respect and empower team members. We unlock value through diversity of people, ideas, cross-functional collaboration and continuous learning. We celebrate success and embrace failure as an opportunity to learn and improve.



EQUAL OPPORTUNITY

Our Company is as diverse as the markets we serve, each contributing unique backgrounds, talents, perspectives, and ideas. We utilize and celebrate this diversity as it breeds innovation and creates an environment where we can contribute freely and bring our whole selves to work every day.

We base our work-related decisions on merit, experience, and personal aptitude. We must never discriminate on the basis of race, religion, ethnic or national origin, gender, age, disability, or sexual orientation. We expect our business partners, third parties, and vendors with whom we work to also act in a way that is consistent with our sense of fair treatment and equal opportunity.

Our Commitments:

- *Treat everyone with fairness, respect, and dignity*
- *Encourage and listen to those who voice their opinions and share their thoughts*
- *Create a culture where every voice matters*
- *Be respectful of differences and embrace diversity*
- *Avoid making offensive or derogatory remarks*



Contact the Human Resources Department with questions.

CODE FACT:

Harassment of any kind is never tolerated, regardless of whether it is in our offices, at off-site company functions or on business trips. Your Manager and Human Resources are there to support you to ensure you feel comfortable and safe.

HARASSMENT-FREE WORKPLACE

We operate at our best when we cooperate with others and perform our duties in a professional and collaborative environment where all colleagues are treated with dignity and respect. Behavior that is offensive, intimidating, discriminatory or harassing (including any form of sexual harassment) has no place in our Company.

Our Commitments:

- Maintain a productive and professional work environment
- Create a workplace free of hostility, intimidation, and bullying
- Treat our colleagues and all individuals with whom we work with respect and dignity



Contact the Human Resources Department with questions.



SAFE AND HEALTHY WORK ENVIRONMENT

We all have the right to work in a safe and healthy environment. Whether we are in a manufacturing facility, in a laboratory, in an office, or in a vehicle, we are committed to operating responsibly. This includes creating safe and compliant workplaces and environmentally responsible operations.

Alcohol and Substance Abuse

The use of illegal drugs and the misuse of alcohol and other substances, including over-the-counter or prescription drugs, is prohibited in the workplace. The workplace is anywhere we conduct business, regardless of time or location.

Our Commitments:

- Follow Environmental, Health and Safety (EHS) regulations
- Integrate our EHS policy into every aspect of our business
- Recognize and reward EHS performance
- Identify, understand, and mitigate safety risks
- Report potential and actual hazards, incidents or illnesses immediately



Read more in our *Environment, Health and Safety (EHS) Policy*.




DATA PRIVACY AND PROTECTION

The collection and use of personal information may occur during many of our research and business activities. Personal information includes data that can be used to directly or indirectly identify an individual, such as name, contact information and health-related information. Most countries have implemented privacy and data protection laws that set requirements for the appropriate handling of personal information. To maintain trust and credibility, we comply with all applicable privacy laws and regulations wherever the Company does business and handle personal information with care and responsibility.

Our Commitments:

- *Comply with applicable laws and regulations overseeing the use and protection of personal information*
- *Collect and use the minimum amount of personal information necessary for a legitimate purpose*
- *Keep personal information only as long as necessary and dispose of it properly*
- *Share personal information only with individuals who have a legitimate need for it*

 Read more in our *Global Privacy Policy*, refer to the *Privacy* page on Atrium, or contact the Global Privacy Office at privacy@alexion.com.

RECORDS MANAGEMENT

Our Company records – recorded information captured in any medium to reflect circumstances, events, activities, transactions or results created or maintained as part of conducting business – need to be properly managed.

In addition, we may receive requests by third parties, lawsuits or other inquiries for our records and documents from time to time. We are obligated to preserve all records relevant to any litigation or government investigation involving Alexion. If we receive a legal or tax audit hold notice, we must not alter or discard any relevant information.

Our Commitments:

- *Create, maintain, and store both physical and electronic records in a secure and appropriate manner*
- *Cooperate fully with internal and external audits and related requests.*



Contact the Legal or Global Compliance Departments with questions or to understand which records must be preserved.






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A photograph of two scientists in a laboratory. The scientist in the foreground is wearing a white lab coat, safety glasses, and purple gloves, and is holding a pipette. The scientist in the background is also wearing a white lab coat and safety glasses. They are both looking down at something they are working on. The background is a brightly lit laboratory with various pieces of equipment.

We innovate with discipline and focus to seek creative solutions in all aspects of our work. We take balanced risks and encourage experimentation. We actively listen with humility to diverse internal and external inputs, and harness new ideas.



ETHICAL RESEARCH

At Alexion, we fight rare diseases with persistence, dedication and the relentless pursuit of creating medical innovations that significantly improve patients' lives. In focusing on patients as our Guiding Star, we conduct clinical research in a way that protects their safety and rights and upholds the highest ethical research standards.

When conducting research, we comply with all applicable laws and regulations, as well as international ethical guidelines, such as Good Laboratory Practices (GLP) and Good Clinical Practices (GCP). We are committed to ensuring all protocols are properly reviewed and approved and that patients are informed about the purpose of our research and have consented. The integrity and quality of our clinical data and the transparency of our clinical study results is important to our reputation.

Our Commitments:

- *Ensure study participants are not exposed to unnecessary risks*
- *Explain the nature and purpose of research to participants and gain their informed consent*
- *Follow privacy and confidentiality rules*
- *Provide data that enables transparent and accurate reporting, interpretation and verification*

 Contact the Global Clinical Development, Global Regulatory, or Quality Departments with questions.

COMPANY ASSETS


We are all responsible for protecting our Company assets and treating them with care. Our assets – whether information, physical, financial or technology assets – are essential to operating successfully. By properly managing our assets, we are able to innovate for solutions.

Examples of Company assets include, but are not limited to:

- Facilities
- Equipment
- Cash and other funds
- Hardware
- Software
- Information systems
- Mobile devices
- Information and records
- Intellectual property

Our Commitments:

- *Only use Company assets for legitimate business purposes*
- *Protect Company assets against theft, loss, damage or misuse*
- *Use only software that has been properly licensed*
- *Avoid using Company assets for personal gain*
- *Protect user IDs and passwords*

 Contact the Security, Information Technology, or Global Compliance Departments with questions or to raise a concern.

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

Our confidential information and intellectual property are what help us to innovate and ultimately succeed in the marketplace. We all have an obligation to protect the sensitive information we encounter or are given access to during collaborations, business partnerships and from our prior employment. The unauthorized release of these assets could adversely impact our Company and damage our relationships with customers and other stakeholders. All Company-related or Company-owned data and information – including those on our personal devices – are considered proprietary information and are the property of the Company. This data and information is subject to inspection, review and/or collection by the Company.

Confidential Information

In the course of our work, we may be granted access to Confidential Information which is protected, non-public information. We must apply additional care and attention to ensure this information is protected and secure. We respect all patents, trademarks, copyrights, proprietary information and trade secrets, as well as the confidential information of anyone with whom we do business.

Examples of Confidential Information include, but are not limited to:

- Non-public sales and earnings figures
- Financial projections or strategic plans
- Technology, operations, research, and technical data
- Manufacturing techniques and processes
- Employee files, compensation data, and other personal information
- Third-party information and records (e.g., patients, healthcare professionals, vendors, suppliers, etc.) given to us in confidence

Intellectual Property

All intellectual property – information that has commercial value and is the result of creative effort including copyrighted property, patents, trademarks, service marks, and trade secrets – must be in strict compliance with all applicable intellectual property laws as well as other guidance from the Legal Department.



We have an obligation to preserve confidential information and intellectual property, even after employment or the relevant business relationship ends.

Our Commitments:

- *Use and disclose confidential information only for legitimate business purposes*
- *Share confidential information only with authorized parties and with approval by the Legal Department*
- *Properly collect, store, use, disclose, and destroy confidential information in an appropriate and secure manner*
- *Use encryption where appropriate and, when uncertain if information is confidential, assume it is*
- *Avoid discussing confidential information in public areas or at work in the presence of colleagues who are not authorized to have access to the information*
- *Protect our intellectual property from misuse and respect the intellectual property of others*
- *If you create or invent things as part of your job, take the steps required to protect the intellectual property that results from your work*



Read more in our [Global Privacy Policy](#), or contact the Global Privacy Office with questions.

COMPETITIVE INTELLIGENCE

Information about competitors is a valuable asset in our competitive business environment. When collecting business intelligence, we always abide by the highest ethical standards and insist that our business partners follow the same ethical standards.



Some of us are former employees of competitors.

We must take care and remain vigilant that we do not use or disclose non-public or confidential information of our former employers.

Our Commitments:

- Obtain competitive information only through legal and ethical means
- Be careful when accepting information from third parties
- Respect the confidentiality obligations of others



Contact the Legal or Global Compliance Departments with questions.

CODE FACT:

We do not use proprietary confidential information about our competitors to our advantage, as we do not need outside influence to achieve our objectives. Any information about our competitors that is not in a public document is proprietary.

FAIR COMPETITION

Fair and honest competition is a great motivator that drives us to be more innovative and continue to improve the patient experience. Antitrust and competition laws prohibit agreements between Alexion and our competitors that affect prices, terms or conditions of sale or fair completion. We work hard every day to earn business on the merits of our science and our products, and we avoid activities that may limit competition through illegal or unfair means.

Our Commitments:

- Avoid speaking to competitors about any of the following:
 - Pricing, terms and conditions of sale, sales plans, volumes, costs or customer information.
 - Dividing production, customers, markets or territories
 - Limiting sales or production
- Do not try to stop a competitor from entering our markets
- Do not manipulate a competitive bidding process



Contact the Legal Department with questions.

COMMUNICATIONS WITH THE PUBLIC

It is essential that our public communications are clear, consistent, and responsible. For this reason, only authorized persons may communicate on behalf of our Company with outside entities such as the media, members of the investment community, and government officials.

Our Commitments:

- ➔ *Avoid responding to external inquiries regarding Company activities, results, plans, or positions on public issues without authorization*
- ➔ *Always communicate honestly and openly with patients, customers, business partners, shareholders, or anyone who has an interest in our Company*



Read more in our *Response to Media Policy*, or contact the Corporate Communications Department with questions.



SOCIAL MEDIA

We often use social media and web-based communications to stay connected and strengthen our professional and personal relationships. Social media refers to digital technologies and practices that enable people to create and share content, opinions, insights, experiences and perspectives.

We are always mindful of how we use social media, on-line forums, blogs, newsgroups, chat rooms, or bulletin boards. We cannot give the impression we are speaking on behalf of the Company, unless we are authorized to do so.

Our personal posts about Alexion's interests—anything about our business, products, colleagues and former colleagues, policies, research, relationships and competitors—must include a disclaimer that mentions your relationship to the Company and explains that the statements or opinions expressed are your own and do not necessarily represent those of the Company.



Colleagues may not engage (like, share, post, comment) on any branded content connected to our current or future therapies or business development on social media.

Our Commitments:

- Obtain necessary permissions before making Company-related posts
- Only make authorized disclosures
- Avoid giving the impression that we are speaking on behalf of the Company, unless we are authorized to do so



Read more in our *Employee Use of Social Media Policy*, or contact the Investor Relations or Corporate Communications Departments with questions.



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