



# Code of Business Conduct and Ethics

## Delivering with Purpose



## **Delivering with Purpose: A Message from Our CEO**

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**“WE MUST HOLD  
OURSELVES  
ACCOUNTABLE  
FOR OUR ACTIONS  
AND NEVER  
COMPROMISE OUR  
INTEGRITY.**

## Delivering with Purpose: A Message from Steve

Dear Team Viridian,

At Viridian, we are a dedicated, resilient, and tenaciously driven team. Our goal is to develop and deliver better medicines for people, and it is reflected in everything we do: from early research to enrolling clinical trials and seeking regulatory approvals, to educating patients and healthcare professionals about our programs in a fair and balanced way. We will always strive to overcome obstacles, persevere, and achieve our goals to make a positive impact on the lives of patients and their community.

How we go about delivering on those goals matters. We must hold ourselves accountable for our actions and never compromise our integrity. By doing things the right way and making good ethical choices, we link our shared momentum to achieve our goals together with our commitment to make a better life for people affected by complex diseases.

That is why we have developed “**Delivering with Purpose: Viridian’s Code of Business Conduct and Ethics**,” which embodies the values that direct our daily decisions and behaviors. Our Code of Conduct provides a practical guide for handling how we work together, treat each other, and represent our organization both internally and externally. It will serve as a resource for all of us, and if you cannot find the specific answers that you are looking for in the Code of Conduct, it will point you to the Viridian resources and policies that can.

I encourage everyone to read our Code of Conduct carefully, ask questions, and speak up when something does not feel right. It is a responsibility that we all share and is essential for delivering great results to our community of patients, healthcare professionals, employees, and shareholders.

Sincerely,



Steve Mahoney  
**President and Chief Executive Officer**

## MISSION STATEMENT

We exist to tenaciously develop and deliver better medicines for people.

## CORE VALUES

### Delivering Impact

means swiftly achieving results with excellence, reliability, and accountability, creating meaningful and lasting value.

### Tenaciously Driven

is the persistent resolve to overcome challenges, adapt to obstacles, and stay focused on achieving goals.

### Embracing Success

honors hard work, champions accomplishments, and appreciates humor and camaraderie amid dedication and effort.

### Shared Momentum

is the effective coordination of our people, processes, and priorities—enabling clear communication, alignment, teamwork, and a dynamic push forward.

### Compassionately Connected

reflects our commitment to making life better for people with complex diseases, while also striving to do our best for our employees and partners.



## USING OUR CODE

What does it mean to be a part of Team Viridian? It means working with compassion and tenacity to deliver innovative new treatments for rare and complex autoimmune diseases. It means improving the quality of life not just for patients, but for the entire patient community of family and care partners that are also impacted. The work we do is literally life changing.

That is why everyone who works at Viridian, no matter their role or job title, must act with integrity in every action and interaction, making decisions that reflect who we are and what we stand for as a Company. In many situations, the right thing to do may be clear. But we understand that work can be complicated – and so can the laws and rules that apply to us. Sometimes it can be hard to know what to do or where to go for help.

Our Code of Business Conduct and Ethics (“Code”) is your most important resource in this effort. It is designed with you in mind—a vital resource that will help you:

- Comply with applicable laws, regulations, and Company policies.
- Promote integrity and the highest standards of ethical conduct.
- Address common ethical situations you could encounter in your work.
- Avoid even the appearance of anything improper in connection with our Company’s business activities.

## Complying With Laws and Regulations

Viridian is committed to compliance with all laws, rules, and regulations that apply to our business. It is impossible to anticipate every question you may have or situation you might face so, in addition to the Code, Viridian also has other resources that can be of help. These additional resources are listed throughout the Code. As always, we rely on you to use good judgment and seek help when you need it.

We operate in multiple countries, so it is important to be aware of different laws and customs that may apply. While we respect the norms of our customers, business partners, and coworkers throughout the world, all employees must, at a minimum, comply with the standards and principles in this Code. If any guidance in our Code conflicts with a local law, rule, or regulation, you should seek guidance from Compliance or the Legal Department. If you believe you may have broken a local law, rule, or regulation due to a conflict, contact the Legal Department.

## Who Must Follow This Code

All employees of Viridian and its subsidiaries, including executives and members of our Board of Directors, are required to read, understand, and follow our Code. Consultants, contractors, agents, suppliers, vendors, and temporary employees (“business partners”) who serve as an extension of Viridian are also expected to follow the spirit of our Code, as well as any applicable contractual provisions.

If you supervise a business partner, you are responsible for communicating our standards and ensuring they are understood. If a business partner fails to meet our ethics and compliance expectations or their contractual obligations, it may result in the termination of their contract.



## Accountability and Discipline

Violating our Code, our policies, or the law, rules, and regulations, or encouraging others to do so, exposes the Company to liability and puts our reputation at risk. It is everyone's responsibility to report suspected violations.

Anyone who violates our Code may be subject to disciplinary actions, up to and including termination of their employment with Viridian. Violations of laws, rules, or regulations may also result in legal proceedings and penalties including, in some circumstances, potential criminal prosecution.





## Remote Working

Viridian supports a hybrid work model for office-based employees, and a portion of our workforce operates in fully remote roles. Regardless of location, our commitment to Viridian's values, standards, and policies remains unchanged. No matter where we are working—at home, while traveling, or anywhere else in the world—we have a duty to maintain our Company's high standards and follow our policies.

When working remotely, maintain consistent productivity, engagement, and responsiveness as you would in an office setting. Always do what is expected of you. Be accessible during standard working hours and collaborate effectively with colleagues and stakeholders. Also protect any Viridian assets that are in your care, including technology, hardware, and confidential information.

Remote work—whether hybrid or fully remote—comes with the responsibility to meet the same standards of conduct and performance expected in any Viridian workplace.

# UNDERSTANDING OUR OBLIGATIONS

Each of us has an obligation to act with integrity, even when this means making difficult choices. Meeting this obligation is what helps us succeed and grow.

## Employee Responsibilities

Each of us has a responsibility to:

- Act professionally, honestly, and ethically when conducting business on behalf of our Company.
- Know the information in our Code and policies, paying particular attention to the topics that apply to our specific job responsibilities.
- Complete all required training within the allotted time and stay up to date on current standards and expectations.
- Report concerns about possible violations of our Code, our policies, or the law to your manager, Human Resources, Compliance, the Legal Department, or through the Viridian Hotline.
- Cooperate and tell the truth when responding to an investigation or audit, and never alter or destroy records in response to an investigation or when an investigation is anticipated.

## Additional Responsibilities of Managers

Viridian managers are expected to:

- Lead by example. Model high standards of ethical business conduct, and help create a work environment that values mutual respect and open communication.
- Be a resource for others. Communicate with employees and business partners about how the Code and other policies apply to their daily work.
- Be proactive. Look for opportunities to discuss and address ethical dilemmas and challenging situations with others.
- Delegate responsibly. Never delegate authority to any individual whom you believe is not qualified for the responsibility or may engage in unlawful/unethical activities.
- Respond quickly and effectively. When a concern is brought to your attention, treat it seriously and with respect for everyone involved. Escalate the issue to ensure it is addressed appropriately.
- Be aware of the limits of your authority. Do not take any action that exceeds your authority. If you are unsure of what is appropriate (and what is not), discuss the matter with your manager, department head, or Human Resources.

Remember: No reason, including the desire to meet business goals, should ever be an excuse for violating our Code, our policies, or the law and regulations.

## WHAT IF?

**I'm a manager and not clear about what my obligations are if someone comes to me with an accusation—and what if it involves a senior manager?**

No matter who the allegation involves, you must report it. Viridian provides several options for reporting concerns. If for any reason you are uncomfortable making a report to a particular person, you can reach out to Human Resources, Compliance, the Legal Department, or through the Viridian Hotline.

**I observed misconduct in an area not under my supervision. Am I still required to report the issue?**

Yes, all employees are required to report misconduct whether it is under your area of responsibility or not. You have a special obligation to be proactive. The best approach would be to talk first with the manager who oversees the area where the problem is occurring, but if this isn't feasible or effective, you can contact Human Resources, Compliance, the Legal Department, or utilize the Viridian Hotline.

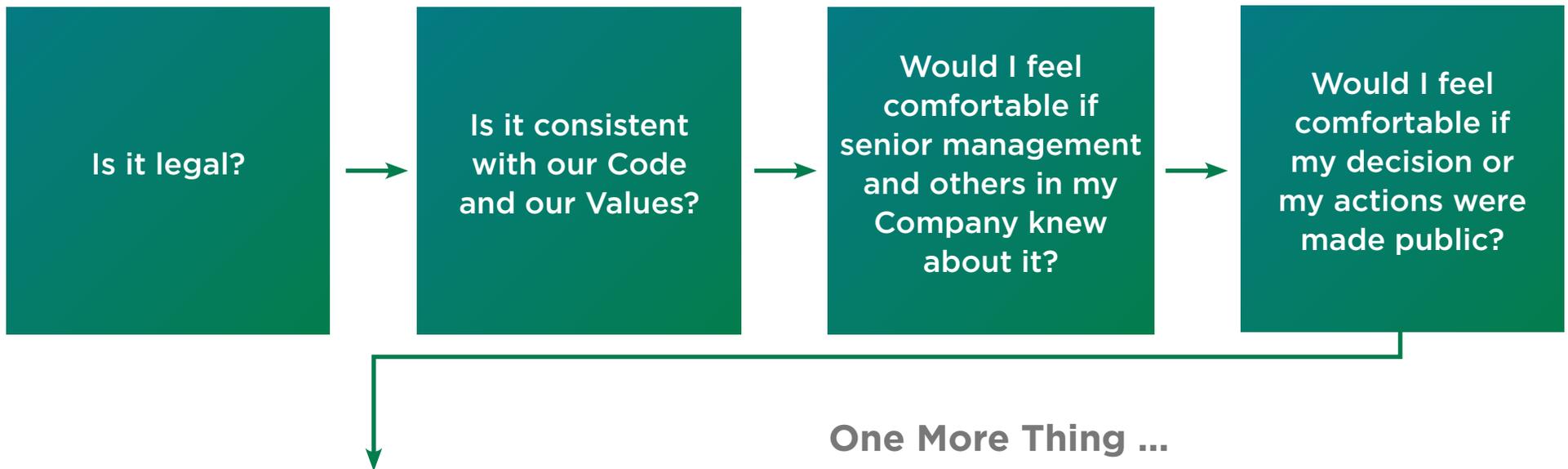
## OUR POLICIES

**Viridian Therapeutics Employee Handbook**

# MAKING ETHICAL DECISIONS

Making the right decision is not always easy. There may be times when you'll be under pressure or unsure of what to do. Always remember that when you have a tough choice to make, you are not alone. There are resources available to help you.

**Facing a Difficult Decision?** It may help to ask yourself:



If the answer to all of these questions is “**yes**,” moving forward is likely OK, but if the answer to any question is “**no**” or “**I am not sure**,” stop and seek guidance.

Remember, in any situation, under any circumstances, it is always appropriate to ask for help.

## One More Thing ...

We value your feedback. If you have suggestions for ways to enhance our Code, our policies, or our resources to better address a particular issue, bring them forward. Promoting an ethical Viridian is a responsibility we all share.

## SHARING CONCERNS

If you see or suspect a violation of our Code, our policies or the law, or if you have a question about what to do, talk to your manager.

If you are uncomfortable speaking with your manager, there are other resources available to help you:

- Contact another member of management.
- Contact Human Resources, Compliance, or the Legal Department.
- Contact the [Viridian Hotline](#) or +1 833 596 6699.

Viridian will make every reasonable attempt to ensure that your concerns are addressed appropriately.

### WHAT IF?

**I believe someone misused the Viridian Hotline, made an anonymous call and falsely accused someone of wrongdoing. What should I do?**

Report your concern immediately. Experience has shown that hotlines are rarely used for malicious purposes. However, it is important to know that we will follow up on reports, and anyone who uses the Viridian Hotline in bad faith to spread falsehoods or threaten others, or with the intent to damage another person's reputation, will be subject to disciplinary action.

### What to Expect When You Use the Viridian Hotline

The Viridian Hotline web portal and phone line are available 24 hours a day, seven days a week. Operated by an independent third-party provider of corporate compliance services, the Hotline provides an avenue to ask questions, raise concerns, and report potential violations. The Hotline will document what is reported and forward it on to Viridian to be addressed.

When you contact the Hotline, you may choose to remain anonymous where permitted by local law. All reports received will be treated equally, whether they are submitted anonymously or not.

After you make a report, you will receive an identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information to conduct an effective investigation. This identification number will also enable you to track the resolution of the case; however, please note that out of respect for privacy, Viridian will not be able to inform you about individual disciplinary actions.

Any report made is considered confidential and handled with care and discretion. Details are only shared with individuals who are directly involved in reviewing or investigating the matter.

Remember, an issue cannot be addressed unless it is brought to someone's attention.



### What Does Reporting “in Good Faith” Mean?

It means making a genuine attempt to provide honest, complete and accurate information, even if it later proves to be unsubstantiated or mistaken.

### What Does Reporting “in Bad Faith” Mean?

It means making knowingly false or inaccurate statements with the intent to deceive, often to harm or defraud others.

## Our Commitment to Non-Retaliation

We will not tolerate retaliation against any colleague who, in good faith, asks a question, reports conduct that may be inconsistent with our Code, our policies, or the law, or assists in an investigation of suspected wrongdoing.

### WHAT IF?

**I suspect there may be some unethical behavior going on involving my manager. I know I should report my suspicions, and I am thinking about using the Viridian Hotline, but I am concerned about retaliation.**

You are required to report misconduct and, in your situation, using the Viridian Hotline is a good option. We will investigate your suspicions and may need to talk to you to gather additional information. After you make the report, if you believe you are experiencing any retaliation, report it. We take claims of retaliation seriously. Reports of retaliation will be thoroughly investigated and, if they are true, retaliators will be disciplined.



## OUR POLICIES

### Investigations and Non-Retaliation Policy

## CREATING AN INCLUSIVE WORKPLACE

Viridian helps bring together employees with a wide variety of backgrounds, skills, and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results. We are committed to ensuring that everyone in our workplace—employees, job applicants, and business partners—feel welcome and valued and are given opportunities to grow, contribute, and develop with us. To uphold that commitment, we support laws prohibiting discrimination and provide equal opportunity for employment, income, and advancement in all our departments, programs, and worksites.

Hiring and employment decisions are always based on qualifications, demonstrated skills, and achievements—and never on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, age, disability, genetic information, or any other characteristic protected by law.



### DO THE RIGHT THING

- Treat others respectfully and professionally.
- Consistently ensure fairness and equity in hiring and other employment decisions.
- Do not discriminate against others on the basis of any other characteristic protected by law or Company policy.



### WATCH OUT FOR

- Comments, jokes or materials, including emails, that others might consider offensive.
- Inappropriate bias when interacting with or evaluating others. If you supervise others, judge them on performance. Use objective, quantifiable standards and avoid introducing unrelated considerations into your decisions.



### WHAT IF?

**One of my coworkers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?**

You should notify your manager, Human Resources, Compliance, the Legal Department, or the Viridian Hotline. Sending these kinds of jokes violates our values, our email usage policies, and our standards on harassment, discrimination, and belonging. By doing nothing you are condoning discrimination and tolerating beliefs that can seriously erode the team environment we have all worked to create.



### OUR POLICIES

**Non-Discrimination and Non-Harassment Policy**  
**Viridian Therapeutics Employee Handbook**

## SHOWING RESPECT TO ALL

We all have the right to work in an environment that is free from intimidation, harassment, bullying, and abusive conduct. Viridian does not tolerate any employee engaging in abusive behavior that disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment.

If you see, suspect, or feel you have been the victim of harassment (including sexual harassment), report it immediately. You'll be helping to preserve a respectful and productive workplace.

### Sexual Harassment

A common form of harassment is sexual harassment, which in general occurs when:

- Actions that are unwelcome—such as a request for a date, a sexual favor, or other similar conduct of a sexual nature—are made a condition of employment or used as the basis for employment decisions.
- An intimidating, offensive or hostile environment is created by unwelcome sexual advances, insulting jokes or other offensive verbal or physical behavior of a sexual nature.





## DO THE RIGHT THING

- Promote a positive attitude—support policies designed to build a safe, ethical and respectful workplace.
- Help each other—speak out when a coworker’s conduct makes others uncomfortable.
- Be professional—do not visit inappropriate internet sites or display sexually explicit or offensive pictures.
- Speak up—report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.



## WATCH OUT FOR

- Threatening remarks, obscene phone calls, stalking, or any other form of harassment.
- Sexual harassment or other unwelcome verbal or physical conduct of a sexual nature.
- The display of sexually explicit or offensive pictures or other materials.
- Sexual or offensive jokes or comments.
- Verbal abuse, threats, or taunting.



## WHAT IF?

**While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. We weren’t in the office, and it was after regular working hours, so I wasn’t sure what I should do. Was that harassment?**

It could be. We expect our employees to practice respect, not only during working hours but in all work-related situations, including business trips. Tell your colleague you are uncomfortable with these actions and ask them to stop. If they continue, report the problem.

**I frequently hear a colleague making derogatory comments to another coworker. These comments make me feel uncomfortable, but I feel like it’s none of my business, and the person they’re directed at will speak up if they are offended. Should I ignore this?**

No, you shouldn’t. It’s up to each of us to help maintain a work environment where people feel welcome, valued, and included. Since you’re aware of this situation, you have a responsibility to speak up about it. If you feel you can, speak to your colleague and ask that this behavior stop. If you feel you can’t or the comments continue, talk to your manager, Human Resources, Compliance, the Legal Department, or the Viridian Hotline.

# PRIORITIZING HEALTH AND SAFETY

Ensuring safety is an integral part of everything we do. Reporting risks and hazards is not just the right thing to do, it is a requirement, because a failure to speak up about an incident, or to participate in an investigation into an incident, can have serious repercussions for our Company, and for every employee on the job, every day.

Each of us is responsible for acting in a way that protects ourselves and others. No matter what job you do or where you do it, we count on you to actively promote a safe and healthy workplace, and report any situations that may pose a health, safety, or security risk. Do your part to keep everyone safe.

## Alcohol and Drugs

While at work or on Viridian business:

- Always be ready to carry out your work duties—never impaired.
- Do not use, possess, or be under the influence of illegal drugs or any substance that could interfere with a safe and effective work environment.

## Workplace Violence

Violence of any kind has no place at Viridian. We won't tolerate:

- Intimidating, threatening, or hostile behavior.
- Causing physical injury to another.
- Acts of vandalism, arson, sabotage, or other criminal activities.
- The carrying of firearms or other weapons onto Company property unless you are authorized to do so.





## DO THE RIGHT THING

- Follow the safety, security, and health rules and practices that apply to your job.
- Maintain a neat, safe working environment by keeping workstations, aisles, and other workspaces free from obstacles, wires, and other potential hazards.
- Notify your manager immediately about any unsafe equipment, or any situation that could pose a threat to health or safety or the environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- Cooperate with any investigations into incidents.



## WATCH OUT FOR

- Unsafe practices or work conditions.
- Carelessness in enforcing security standards, such as facility entry procedures (e.g., ID tailgating) and password protocols.



## WHAT IF?

**I've noticed some practices in my area that don't seem safe. Who can I speak to? I'm new here and don't want to be considered a troublemaker.**

Discuss your concerns with your manager, Facilities, Human Resources, or the Viridian Hotline. There may be very good reasons for the practices, or you may be bringing to light an issue that needs to be addressed. In either case, raising a concern about safety does not make you a troublemaker. It makes you a responsible employee who is concerned about the safety of others.

**A contractor commits a violation of our standards. Are contractors expected to follow the same health, safety, and security policies and procedures as employees?**

Absolutely. Managers are responsible for ensuring that contractors and other business partners at work on Viridian premises understand and comply with all applicable laws and regulations, as well as with additional requirements our Company may have.

## ENRICHING PATIENTS' LIVES

We focus on patients' needs. A major way we do this is complying with all applicable laws that regulate our industry. Many of these laws concern the way we promote and sell our products. It is never acceptable to try to influence purchasing decisions in any way that is unethical, inappropriate, or illegal, or creates a potential conflict of interest.

Be honest, open, and up-front when interacting with those who may be interested in buying or prescribing our products.



### DO THE RIGHT THING

- Understand how these laws apply to your job and ask for guidance from the Compliance or Legal Departments if you are ever unsure of the proper course of action.
- If you are in a situation outside the United States where local regulations, rules, or laws seem to conflict with our Code or applicable U.S. regulations, consult your manager or seek guidance from Compliance or the Legal Department.

### The Laws That Apply to Our Business

We abide by all laws, regulations, policies, and procedures that apply to our jobs, including:

- **U.S. Anti-kickback Statute.** We don't give anything of value to induce a healthcare professional to use or recommend pharmaceutical products that are paid for or reimbursed by the government.
- **U.S. False Claims Act and similar laws in other countries.** We don't submit or cause the submission of false claims for health care reimbursement to the government.
- **Food, Drug, and Cosmetic Act, Public Health Service Act (PHSA), and similar laws in other countries.** We don't promote a regulated product or an indication that has not received Food and Drug Administration (FDA) or other appropriate regulatory approval.
- **Transparency Laws.** We report payments and transfers of value made to healthcare professionals and others, as required by transparency laws and regulations.
- **U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and similar laws in other countries.** We do not participate in bribery or corruption and adhere to all local laws and regulations that cover bribery and corruption.



### OUR POLICIES

#### Anti-Bribery and Anti-Corruption Policy

## WORKING WITH HEALTHCARE PROFESSIONALS

In our interactions with healthcare professionals, we promote patient welfare by observing good business practices, meeting industry standards, and complying with Viridian policies. This includes not only complying with federal and state laws, but also adherence to the PhRMA **Code on Interactions with Health Care Professionals** and other applicable trade association regulations.

Make sure all interactions are professional and serve a legitimate business purpose, and never engage in any conduct that is intended to—or could even suggest the appearance of—improperly influencing a healthcare professional's medical decision making.



### DO THE RIGHT THING

- Never pay or offer to pay anyone, including colleagues, physicians, or any other provider to refer a patient.
- Do not offer or give anything of value to influence or reward prescribing, using, purchasing, or recommending our products or services.



### WATCH OUT FOR

- **Business courtesies**—federal and state laws and our policies strictly limit what we may give healthcare professionals. Gifts and entertainment are never allowed, and hospitality must always be incidental to the business engagement.
- **Improper influence**—do not interfere with the independent medical decision making of healthcare professionals.



### OUR POLICIES

Interactions with Healthcare Professionals Policy

# CHAMPIONING SAFETY AND QUALITY

We develop our products with patient communities in mind and are dedicated to ensuring they receive safe, high-quality products and therapies. Our commitment to safety and quality has allowed us to earn the trust of patients and physicians around the world.

Patient safety is always a priority. Viridian adheres to the highest standards, and never sacrifices quality to meet a company target or deadline. If you see or suspect activity that goes against our commitment, [speak up](#).

## How We Inspire Trust

We deliver on our promises and ensure that we meet the highest standards by:

- Continuously improving our processes and operations everywhere we do business.
- Following the most stringent guidelines when applicable.
- Implementing controls and safeguards to protect the integrity of data collected on our products.
- Testing our products to ensure they meet all approved quality standards prior to releasing them to the market.
- Evaluating the performance of our products throughout their lifecycle to ensure quality and reliability.

## Adverse Events and Product Complaints

We have an obligation to report any issue that could compromise the quality or safety of our products we provide to healthcare professionals and patients.

It is everyone's responsibility to report potential adverse events or product quality issues, including situations which you suspect or become aware of violating our Viridian Quality policies, within 24 hours of awareness. By acting quickly, you can help us address and correct the issue before it presents a risk to those we serve.



## WHAT IF?

**I think there may be an issue with one of the manufacturing processes at my facility, but we are behind schedule and if I say anything, we will be delayed further as the Company investigates. What should I do?**

Viridian never sacrifices quality to meet a deadline or target. You should report the matter immediately.



## OUR POLICIES

[Quality Manual](#)

[Post Market Surveillance and Reporting \(MDR\) Policy](#)

## Fair Dealing

We treat our customers and business partners fairly. We work to understand and meet their needs and seek competitive advantages through superior performance, never through unethical or illegal practices.

We tell the truth about our services and capabilities and never make claims that aren't true. In short, treat our customers and business partners as you would like to be treated.

## DO THE RIGHT THING

- Be responsive to customer requests and questions. Only promise what you can deliver and deliver on what you promise.
- Never take unfair advantage of anyone by manipulating, concealing, or misrepresenting material facts, abusing confidential information, or any other unfair dealing practice.
- Never grant a customer's request to do something that you regard as unethical or unlawful.
- Be forthright about unexpected delays or setbacks by speaking with your manager about any errors, omissions, or mistakes that could impact our ability to fulfill any agreements.

## WATCH OUT FOR

- Temptations to tell customers what you think they want to hear rather than the truth; if a situation is unclear, begin by presenting a fair and accurate picture as a basis for decision-making.





## MARKETING AND ADVERTISING HONESTLY

Viridian's advertising and promotion efforts focus on conveying truthful, accurate, fair, and balanced information to healthcare professionals, patients (where permissible), and customers. We only promote our products for uses that have been approved or authorized by appropriate government or regulatory agencies. For example, we do not promote in the United States a use that has been approved by another country's government or regulatory agency but not the U.S. Food and Drug Administration.

Do your part to ensure our product claims are grounded in scientific evidence, accepted medical practice, and government-approved labeling rules in all countries where we operate.



### OUR POLICIES

Healthcare Communications Policy

## DEVELOPING NEW TREATMENTS

Research is a critical component of healthcare delivery and is at the heart of all medical advances. The research we conduct at Viridian is not only scientifically beneficial but also upholds the ethical principles of human participant research. Any research we conduct at Viridian must be approved in advance by management, and participant enrollment in any research study or clinical trial must be voluntary.

### Research Misconduct

Viridian will not tolerate research misconduct of any kind. That includes:

- **Fabrication**—making up data or results and recording or reporting fabricated information.
- **Falsification**—manipulating research materials, equipment, or processes, or changing or omitting data or results to misrepresent the research.
- **Plagiarism**—using another person's ideas, processes, results, or words without giving appropriate credit.





## DO THE RIGHT THING

- Review and follow all policies regarding proposal, approval, conduct, and reporting of research.
- Watch for any research-related billing errors by helping us carefully determine and assign the right coding and billing, following budgets, and only paying for bona fide expenses when research participants are involved.
- Direct any research or development related questions (that your team cannot or should not be answering) to Medical Information.



## WATCH OUT FOR

- Situations that could lead to conflicts. Avoid any relationship or activity that could influence or appear to influence your ability to protect research participants, influence research results, or compromise the validity or integrity of data collected in the performance of research.
- Possible misconduct.

## Animal Welfare/Animal Testing

We are dedicated to the ethical and responsible treatment of all animals used in the development of our products. We work to replace the use of live animals, reduce the number of animals used, and refine our procedures to minimize distress, whenever scientifically valid and acceptable to regulators.

If you conduct animal-based research on our behalf—or work with business partners who do—you are expected to comply with our policies and all applicable laws and regulations.



## WHAT IF?

**I believe I may have inadvertently committed plagiarism by not properly citing third-party research in a recent report. The report hasn't been published yet. Is this considered misconduct?**

No. Making a mistake is not intentional misconduct. It would be if you failed to correct the mistake and knowingly published the report without proper attribution. If you become aware of a mistake, alert your manager and take steps to resolve the issue.



## PROTECTING PRIVACY

Customers, patients, and business partners place their trust in us. We must protect their information, including confidential information, just as we protect our own. Make sure you understand the expectations of customers, patients, and business partners regarding the protection, use, and disclosure of the information that they provide to us.

We respect the personal information of others and follow all applicable laws and regulations in collecting, accessing, using, storing, sharing, and disposing of it. We collect only the minimum amount of personal identifiable information (PII) needed to perform our work and use it only for legitimate business purposes and only after obtaining consent, if applicable.

### DO THE RIGHT THING

- Limit any access to third-party confidential information to only those who have a need to know to do their job, and only for authorized purposes.
- Immediately report any suspected or actual loss or theft of confidential information to your manager.

## WATCH OUT FOR

- Requests by business partners for information about customers or patients or about other business partners if there is no associated business requirement or authorization.
- Unintentional exposure of information, including confidential information, about customers, patients or business partners in public settings or through unsecure networks.
- Failing to shred or securely dispose of sensitive information.
- Using “free” or individually purchased internet hosting, collaboration, or cloud services where unintentional exposure of information could occur.

Personally Identifiable Information (**PII**) and Protected Health Information (**PHI**) Viridian complies with all applicable laws and regulations that protect the privacy of PII and PHI.

- **PII** is information that can be used to trace someone’s identity or can be combined with other personal information to do so (for example, a name, address, social security number, driver’s license number, or account number).
- **PHI** is a specific type of personal information that identifies an individual and relates to a person’s physical or mental health, treatment, or payment for health care.



## OUR POLICIES

### Privacy Policy



## ELIMINATING FRAUD, WASTE, AND ABUSE

Viridian is committed to the integrity of the healthcare system and to detecting, correcting, and preventing false claims. As part of this commitment, we expect our employees to be able to recognize and report instances of fraud, waste, and abuse.

Each of us has a responsibility to ensure payments and transactions are properly authorized and fully and accurately recorded in compliance with all applicable laws, regulations, and Viridian policies.



### DO THE RIGHT THING

- Complete all required training and know the definitions of “fraud,” “waste,” and “abuse.”
- Ensure timely and accurate documentation, coding, and billing that reflect services ordered and actually performed.
- Only bill for services we actually provide.
- Promptly report any instances of suspected fraud, waste, or abuse.



### WATCH OUT FOR

Activities that constitute fraud, waste, or abuse, such as:

- Billing for services, procedures, or supplies that have not actually been provided.
- Providing services to patients that are not medically necessary.
- Forging a physician’s signature to obtain pharmaceuticals.
- Intentionally misrepresenting or manipulating information to receive payment for services that were not provided.
- Lack of supporting documentation, where it is required.

# PREVENTING BRIBERY AND CORRUPTION

Viridian is committed to complying with all applicable anti-corruption laws. We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business, regardless of local customs.

Do not pay or accept bribes or kickbacks, at any time for any reason. This applies equally to any person or company representing our Company. Our partners must understand that they are required to operate in compliance with our standards and to maintain accurate records of all transactions. Never ask them to do something that we are prohibited from doing ourselves.

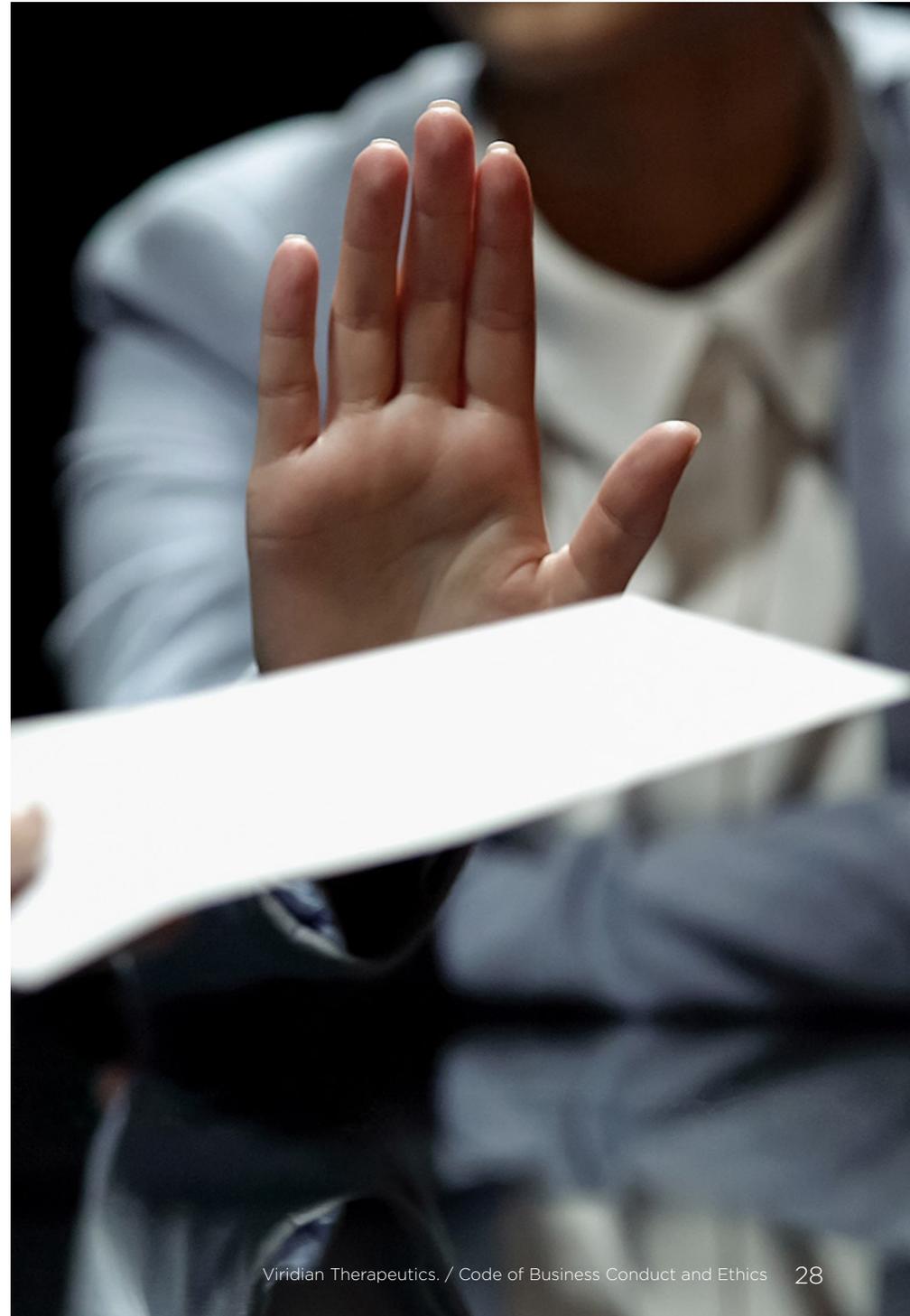
## Key Definitions

**Bribery** means giving or receiving anything of value (or offering to do so) to obtain a business, financial, or commercial advantage.

**Corruption** is the abuse of an entrusted power for private gain.

**Facilitation payments** are typically small payments to a low-level government official that are intended to encourage them to perform their responsibilities.

**Government officials** include government employees, political parties, candidates for office, employees of public organizations, and government-owned entities.



## DO THE RIGHT THING

- Understand the standards set forth under anti-bribery laws which apply to your role at Viridian.
- Never give anything of value inconsistent with local laws and regulations to any government official. If you are not sure of the local laws, the safest course of action is to not give anything of value.
- Exercise due diligence and carefully monitor third parties acting on our behalf particularly when dealing in countries with high corruption rates and in situations where “red flags” would indicate further screening is needed.
- Accurately and completely record all payments to third parties.

## WATCH OUT FOR

- Apparent violations of anti-bribery laws by our business partners.
- Agents who do not wish to have all terms of their engagement with Viridian clearly documented in writing.

## WHAT IF?

**I work with a foreign agent in connection with our operations in another country. I suspect that some of the money we pay this agent goes toward making payments or bribes to government officials. What should I do?**

This should be reported to Compliance, the Legal Department or the Viridian Hotline for investigation. If there is bribery and we fail to act, both you and Viridian could be liable. Investigating these kinds of situations can be culturally difficult in some countries, but anyone doing business with us should understand the necessity of these measures. It is important and appropriate to remind them of this policy.

## OUR POLICIES

Anti-Bribery and Anti-Corruption Policy





## COMPETING FAIRLY

We believe in free and open competition and never engage in practices that may limit competition or try to gain competitive advantages through unethical or illegal business practices.

Do not engage in conversations with competitors about sensitive information or engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers, or markets. Antitrust laws are complex, and compliance requirements can vary depending on the circumstances, so seek help with any questions by contacting the Legal Department about what is appropriate and what isn't.

### Be Alert to Anti-Competition Warning Signs

In general, the following activities are red flags, should be avoided, and, if detected, reported to the Compliance or Legal Department, or the Viridian Hotline:

- Sharing our Company's sensitive information with a competitor.
- Sharing sensitive information of business partners or other third parties with their competitors.
- Attempting to obtain nonpublic information about competitors from new hires or candidates for employment.

## WATCH OUT FOR

- **Collusion**—when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages, or allocations of markets.
- **Bid-rigging**—when competitors or service providers manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding, or knowingly submitting noncompetitive bids.
- **Tying**—when a company with market power forces customers or patients to agree to services or products that they do not want or need.
- **Predatory pricing**—when a company with market power sells a service below cost to eliminate or harm a competitor, with the intent to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.

## WHAT IF?

**I received sensitive pricing information from one of our competitors. What should I do?**

You should contact the Legal Department, or the Viridian Hotline without delay and before any further action is taken. It is important, from the moment we receive such information, that we demonstrate respect for antitrust laws, and we make it clear that we expect others to do the same. This requires appropriate action that can only be decided on a case-to-case basis and may include sending a letter to the competitor.



## AVOIDING INSIDER TRADING

We respect every company's right to protect its material, nonpublic ("inside") information, and we comply with insider trading laws.

In the course of business, you may learn confidential information about Viridian or about other publicly traded companies that is not available to the public. Trading securities while aware of inside information, or disclosing it to others who then trade ("tipping"), is prohibited by various laws and our policies.

### Material Information

Material information is the kind of information a reasonable investor would take into consideration when deciding whether to buy or sell a security. Some examples of information about a company that may be material are:

- A proposed acquisition or sale of a business, or significant transaction for the company
- A significant expansion or cutback of operations
- A significant product development, such as clinical trial results
- Important information about a product
- Revenue results, especially if they are significantly different from expectations
- Extraordinary management or business developments
- Changes in strategic direction such as entering new markets



## DO THE RIGHT THING

- Do not buy or sell securities of any company when you have material nonpublic information about that company, or trade in the securities of another "economically linked" company, such as a competitor or supplier of the company for which you have the information.
- Protect material nonpublic information from the public, including information in all forms, e.g., oral, electronic, or paper copy.
- Discuss any questions or concerns about insider trading with the Legal Department.

## WATCH OUT FOR

- Requests from friends or family for information about companies we do business with or for which we have confidential information. Even casual conversations could be viewed as illegal "tipping" of inside information.
- Sharing material nonpublic information with anyone, either on purpose or by accident, unless it is essential for Viridian-related business. Giving this information to anyone else who might make an investment decision based on your inside information is considered "tipping" and is against the law regardless of whether you benefit from the outcome of their trading.



## OUR POLICIES

### Insider Trading Policy

## HANDLING CONFLICTS OF INTEREST

A conflict of interest can occur whenever an employee has an interest or activity that may interfere with their ability to make an objective decision on behalf of Viridian. Conflicts of interest may be actual, potential, or even just a matter of perception.

Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, because the perception of a conflict can undermine the trust others place in us and damage our reputation. Conflict of interest situations are not always clear-cut, so fully disclose them to your manager and Human Resources so they can be properly evaluated, monitored, and managed.



### DO THE RIGHT THING

- Avoid conflict of interest situations whenever possible.
- Always make business decisions in the best interest of Viridian.
- Think ahead and proactively address situations that may put your interests or those of a family member in conflict with Viridian.
- Discuss with your manager and Human Resources the full details of any situation that could be perceived as a potential conflict of interest.

## Potential Conflicts of Interest

Be alert to situations, including the following, which are common examples of potential conflicts of interest:

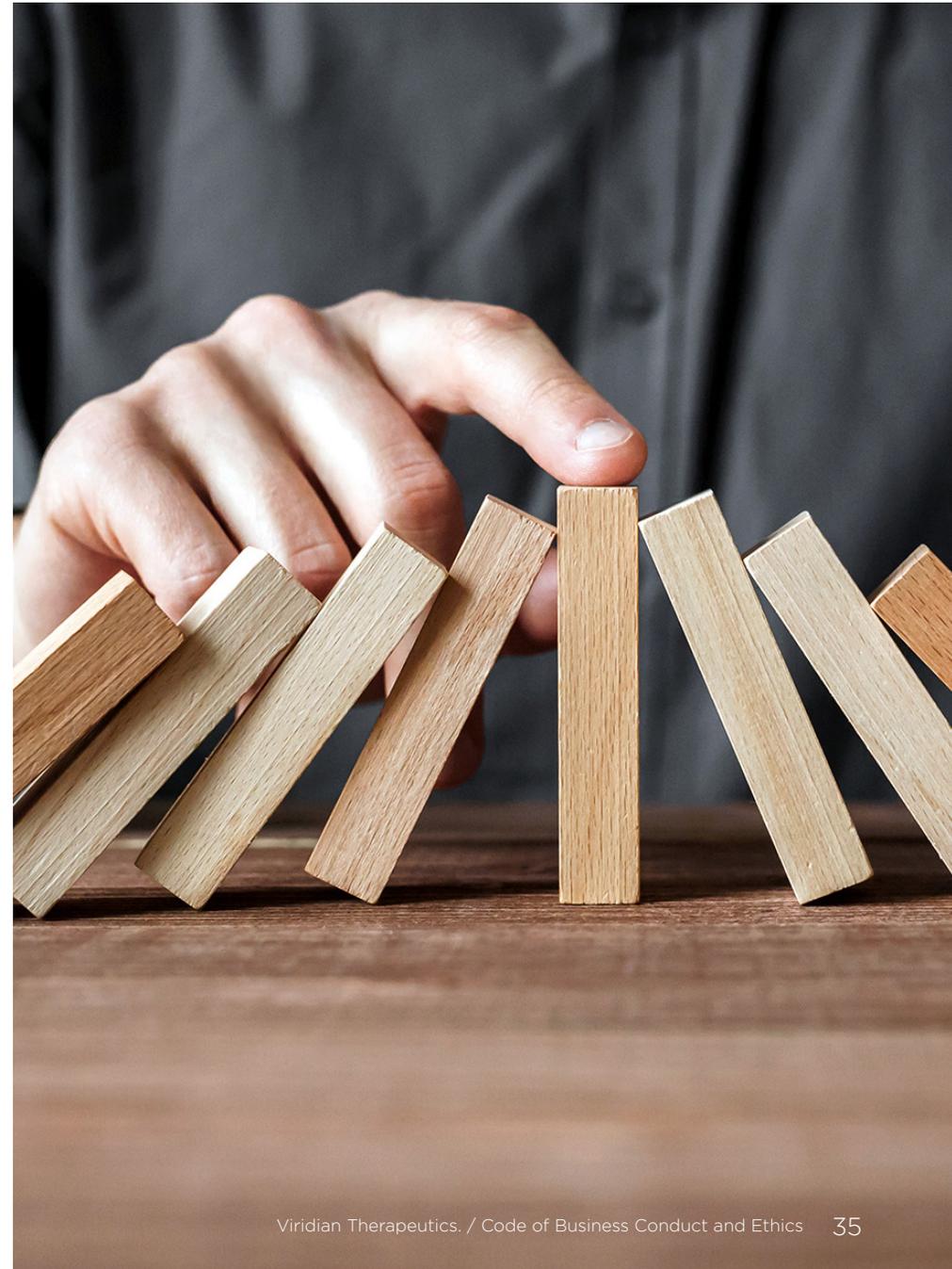
**Corporate opportunities:** If you learn about a business opportunity because of your job, it belongs to Viridian first. This means that you should not take that opportunity for yourself unless you get approval from your manager, Human Resources, and Compliance.

**Friends and relatives:** On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a customer, business partner, competitor, or even our Company. Since it is impossible to anticipate every scenario that could create a potential conflict, you should disclose your situation to your manager to determine if any precautions need to be taken.

**Outside employment:** To ensure that there are no conflicts and that potential issues are addressed, always disclose and discuss outside employment or side businesses with your manager and Human Resources. If approved, make sure the outside activity does not interfere or compete with your work at Viridian. Working for a competitor, business partner, or customer may raise conflicts that will need to be resolved.

**Personal investments:** A conflict can occur if you have a significant ownership or other financial interest in a competitor, business partner, or customer. Make sure you know what's permitted—and what's not—by our policies and seek answers to any questions.

**Civic activities:** Unless and until you've discussed it with Company management, you shouldn't accept a seat on the board of directors or advisory board of any of our competitors, business partners, or customers, especially if your current job gives you the ability to influence our relationship with them.



## APPROPRIATE BUSINESS COURTESIES

A modest gift may be a thoughtful “thank you,” or a meal may offer an opportunity to discuss business. If not handled carefully, however, the exchange of gifts and entertainment could be improper or create a conflict of interest. This is especially true if an offer is extended frequently, or if the value is large enough that someone may think it is being offered as an attempt to influence a business decision.

We do not accept or provide gifts, favors, or entertainment — even if it complies with our policies — where the intent is to improperly influence any decision. Additionally, we do not provide gifts or entertainment, directly or indirectly, to any healthcare professionals or government officials, regardless of the circumstances. Any expenses related to business courtesies should be properly recorded and maintained in accordance with our policies.

### Government Officials

Be aware that the rules for what we may give to—or accept from—government officials are much stricter. Additionally, in many countries outside of the U.S., healthcare professionals are also considered government officials. Don't offer anything of value to a government official if you are unsure of the rules. It is always safer to ask Compliance or the Legal Department for advice prior to engaging with government officials for guidance on whether it is appropriate.

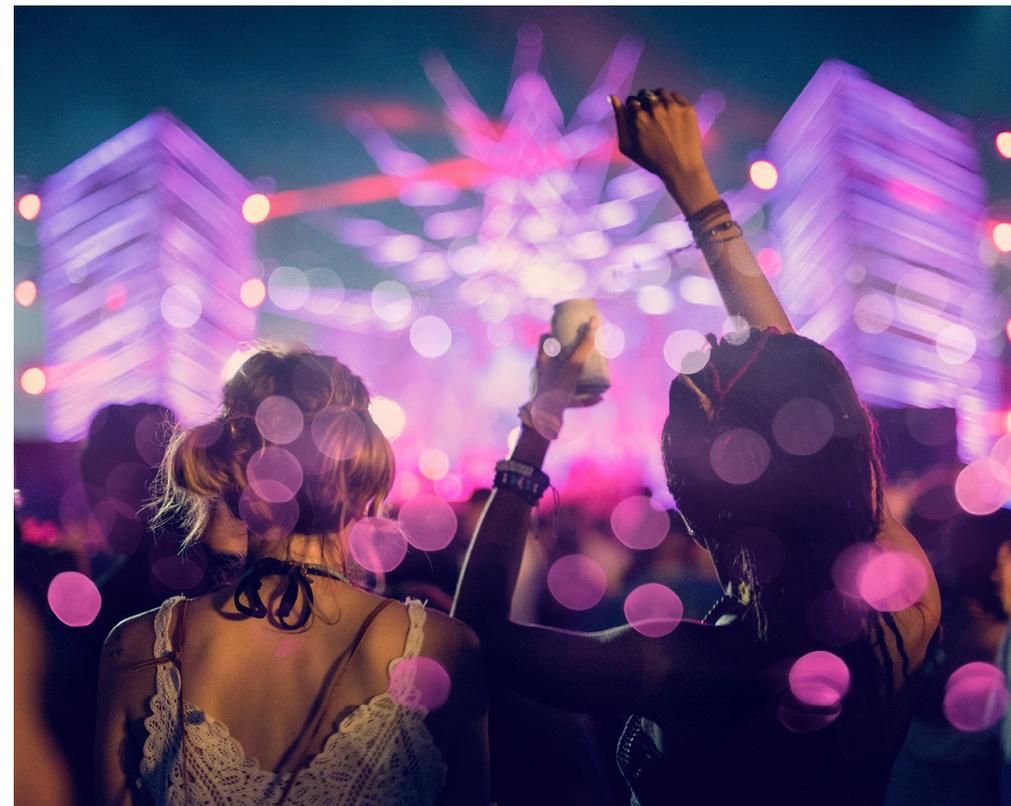


## DO THE RIGHT THING

- Only provide and accept gifts and entertainment that are reasonable complements to business relationships.
- Never offer gifts to—or accept them from—a business partner with whom you are involved in contract negotiations.
- Make sure anything given or received complies with the Company policies of both the giver and the recipient.
- Never give or accept cash or cash equivalents.
- Do not request or solicit personal gifts, favors, entertainment, or services.
- Raise a concern whenever you suspect that a colleague or business partner may be improperly attempting to influence a decision of a customer or government official.

## WATCH OUT FOR

- Situations that could embarrass you or our Company. When unsure, ask yourself, “If this were made public, would it be viewed as inappropriate?”
- Gifts, favors, or entertainment that may be reasonable for a privately owned company but not for a government official or agency.



## INTERACTING WITH THE GOVERNMENT

We are committed to meeting the many special legal, regulatory, and contractual requirements that apply to our government contracts. These requirements may apply to bidding, accounting, invoicing, subcontracting, employment practices, contract performance, gifts and entertainment, purchasing, and other matters. These requirements may also flow down to individuals and companies working on our behalf.

If you are responsible for conducting business with the government on behalf of Viridian, make sure you know and comply with what's contractually required as well as all laws and regulations that apply to our government-related work. The Legal Department is available to answer questions related to these requirements.

From time to time, employees may be asked to participate in internal and external investigations and audits that are conducted by our Company or by government officials. All employees are expected to fully cooperate with all such requests and ensure that any information provided is true, accurate, and complete.

If you learn of a potential government investigation or inquiry, immediately notify your manager and the Legal Department before taking or promising any action. If you are directed by our Company to respond to a government official's request, extend the same level of cooperation and again, ensure that the information you provide is true, accurate, and complete.

### WATCH OUT FOR

- Falsified information. Never destroy, alter, or conceal any document in anticipation of or in response to a request for these documents.
- Unlawful influence. Never provide or attempt to influence others to provide incomplete, false, or misleading statements to a Company or government investigator.



### OUR POLICIES

#### Anti-Bribery and Anti-Corruption Policy

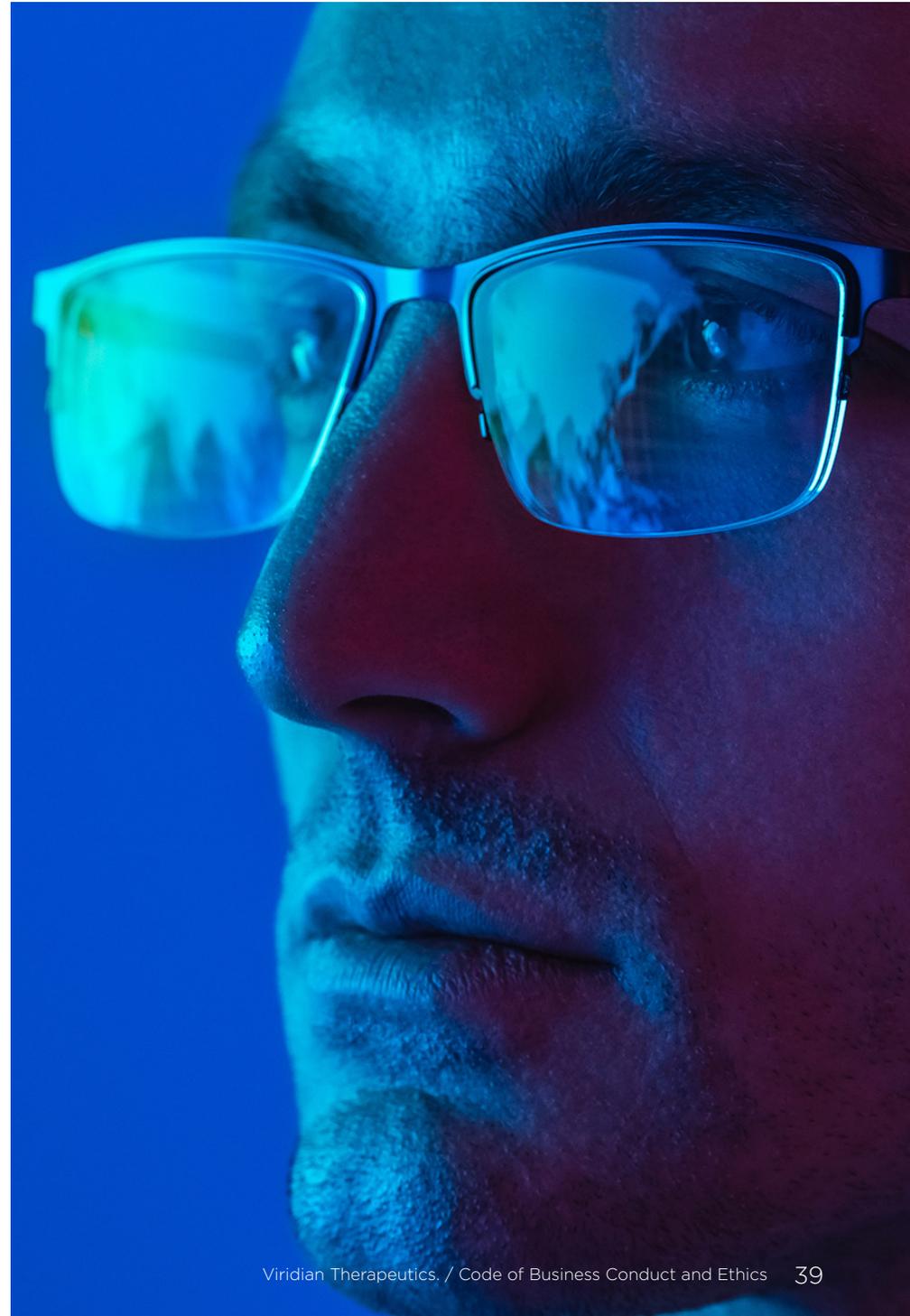
## IMPORTING AND EXPORTING RESPONSIBLY

Viridian has global operations that support a growing, worldwide customer base. To maintain and grow our global standing, we must strictly comply with all applicable laws that govern the import, export, and re-export of our products, and also with the laws of the countries where our products are manufactured, sold, or used. Any violation of these laws, even unintentionally, could have damaging and long-lasting effects on our business.

If your job duties include exporting products or receiving imported products, you are responsible for ensuring screening of customers, suppliers, and transactions take place to make certain that we comply with all applicable export and import requirements.

### Anti-boycott Regulations

We are subject to the anti-boycott provisions of U.S. law that require us to refuse to participate in foreign boycotts that the United States does not sanction. We promptly report any request to join in, support, or furnish information concerning a non-U.S.-sanctioned boycott.





## DO THE RIGHT THING

- Obtain all necessary licenses before the import, export, or re-export of products, services, or technology.
- Report complete, accurate, and detailed information regarding every imported or exported product, as applicable, including its place(s) of manufacture and its full cost.
- Direct any questions you have regarding imports or exports of our products, materials, parts, or technology to the Head of Supply Chain or the Legal Department.



## WATCH OUT FOR

- Transferring technical data and technology to someone in another country, such as through email, conversations, meetings, or database access. This restriction applies to sharing information with coworkers, as well as non-employees.
- Transporting Company assets that contain certain technology (such as a computer an associate takes on a business trip) to another country.



## WHAT IF?

**My work requires regular interaction with Customs officials. As part of my job, I am routinely asked to provide the Customs Service with information about our imports and exports. Do I really need to contact the Head of Supply Chain prior to each and every submission of information to the government?**

The right approach here would be to discuss with the Head of Supply Chain or Legal Department the types of requests your department routinely receives from Customs. These routine requests, once understood, might be handled without any review. Extraordinary requests would still require the Legal Department to review to ensure that you are responding accurately, fully, and in accordance with the law and regulations, as applicable.



## BUILDING STRONG PARTNERSHIPS

Viridian evaluates and engages with qualified business partners on an objective basis grounded in fairness. When selecting partners, we assess their ability to satisfy our business and technical needs and requirements. All agreements must be negotiated in good faith and be fair and reasonable for both parties.

Do your part to hold our business partners to our high standards and ensure they operate ethically, in compliance with the law, and in a way that's consistent with our Code, our policies, and our values.

### Supplier Relations

Viridian evaluates and engages with suppliers (including vendors) on an objective basis grounded in fairness. When selecting suppliers, we assess each supplier's ability to satisfy our business and technical needs and requirements. We also make purchasing decisions based on the long-term cost and benefit to Viridian. All agreements are negotiated in good faith and must be fair and reasonable for both parties.

# PROTECTING COMPANY ASSETS

Viridian entrusts employees with assets (both tangible and intangible) that enable us to operate our business. Physical assets include Viridian facilities, materials, products, and equipment. Electronic assets include computer and communication systems, software, and hardware. Files and records are also Company assets, and we have a responsibility to ensure their confidentiality, security, and integrity.

Each of us is personally responsible for using these assets with care and protecting them from fraud, waste, and abuse. Your personal use of Company assets is discouraged, but where permitted, should be kept to a minimum and have no adverse effect on productivity and the work environment. Be aware that any information you create, share, or download onto Company systems belongs to Viridian, and we have the right to review and monitor system use at any time, without notifying you, to the extent permitted by law.



## DO THE RIGHT THING

- Use Company assets to carry out your job responsibilities, never for activities that are improper or illegal.
- Observe good physical security practices, especially those related badging to gain access to our facilities.
- Be a good steward of our electronic resources and systems, and practice good cybersecurity:
  - Do not share passwords or allow other people, including friends and family, to use Viridian assets.
  - Only use software that has been properly licensed. The copying or use of unlicensed or “pirated” software on Company computers or other equipment to conduct Company business is prohibited. If you have any questions about whether or not a particular use of software is licensed, contact the Information Technology Department.
  - Lock your workstation when you step away and log off our systems when you complete your work for the day.
  - Beware of phishing attempts—use caution in opening email attachments from unknown senders or clicking on suspicious links.

## WATCH OUT FOR

- Requests to borrow or use Viridian equipment without approval.
- Excessive use of Viridian resources for personal purposes.
- Unknown individuals without proper credentials entering our facilities.



## OUR POLICIES

Information Technology and Security Policy



# SAFEGUARDING CONFIDENTIAL INFORMATION

Viridian relies on employees to be vigilant and protect our confidential information and intellectual property—some of our most important and valuable assets. This means keeping this information secure, limiting access to those who have a need to know in order to do their job, and only using it for authorized purposes.

Do your part to safeguard confidential information. Be aware that this obligation continues even after your employment at Viridian ends. Intellectual property that you create in the course of your employment with Viridian belongs to Viridian, and your obligations with respect to this are outlined in more detail in the invention assignment agreement that you executed at the commencement of employment.

Viridian commits substantial resources to intellectual property development, innovation, and technology, and the creation and protection of our intellectual property rights are critical to our business. Contact the Legal Department if you receive questions regarding:

- The scope of our intellectual property rights
- How Viridian intellectual property rights apply to another company's products
- How a third party's intellectual property rights apply to Viridian's intellectual property rights, technology, or products

## Intellectual Property

Examples of intellectual property (IP) include:

- Business and marketing plans
- Company initiatives (existing, planned, proposed, or developing)
- Customer lists
- Supply chain
- Trade secrets and discoveries
- Methods, know-how, and techniques
- Inventions, innovations, and designs
- Systems, software, and technology
- Patents, trademarks, and copyrights

Viridian commits substantial resources to technology development and innovation, and the creation and protection of our intellectual property rights are critical to our business. Contact the Legal Department if you receive questions regarding:

- The scope of our intellectual property rights
- How Viridian rights apply to another company's products
- How a third party's intellectual property rights apply to Viridian's intellectual property rights or products

## DO THE RIGHT THING

- Promptly disclose to the Legal Department any inventions or other intellectual property that you create while you are employed by Viridian.
- Properly label confidential information to indicate how it should be handled, distributed, and destroyed.
- Use and disclose confidential information only for legitimate business purposes.
- Protect our intellectual property and confidential information by sharing it only with authorized parties.
- Only store or communicate Company information using secure means and using Viridian information systems.

## WATCH OUT FOR

- Discussions of Viridian confidential information in places where others might be able to overhear—for example on planes and elevators, in restaurants, and when using your phone.
- Sending confidential information to unattended devices or printers.



## USING ARTIFICIAL INTELLIGENCE ETHICALLY

We embrace new technologies, including artificial intelligence (AI), which is rapidly changing the way Viridian collects, uses, and analyzes data. AI is also empowering us to give customers and patients more efficient and personalized experiences.

Because AI learns and operates in a human-like way, issues involving discrimination, equity, and privacy can arise. That's why it's critical for us to use, design, and develop these tools ethically from the start. Falling short in this effort can expose us to regulatory, legal, and reputational risks. If your work involves AI, data analytics, or other digital technologies, be sure to follow all applicable laws and regulations and build new technologies ethically, fairly, and transparently.



### DO THE RIGHT THING

- Maintain human oversight at all stages of AI use.
- Avoid AI tools and uses that could create or spread bias, discrimination, or unfair outcomes.
- Verify the accuracy of AI outputs and reference source material to minimize outdated or unreliable information.
- Protect intellectual property and confidential information, customer data, patient data, and the security of our systems—never input proprietary data into an AI tool that has not been approved by Viridian and consult with the Information Technology Department with any questions on how to bring in and use AI tools.



# MAINTAINING FINANCIAL INTEGRITY

The accuracy and completeness of our business records and financial disclosures are essential to making informed decisions and supporting investors, regulators, and others. As a public company, we are subject to various laws and regulations relating to our financial reporting. In addition, our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some employees have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. Ensure that any information you record is accurate, timely, complete, and maintained in a manner that is consistent with our internal controls, disclosure controls, and legal obligations.

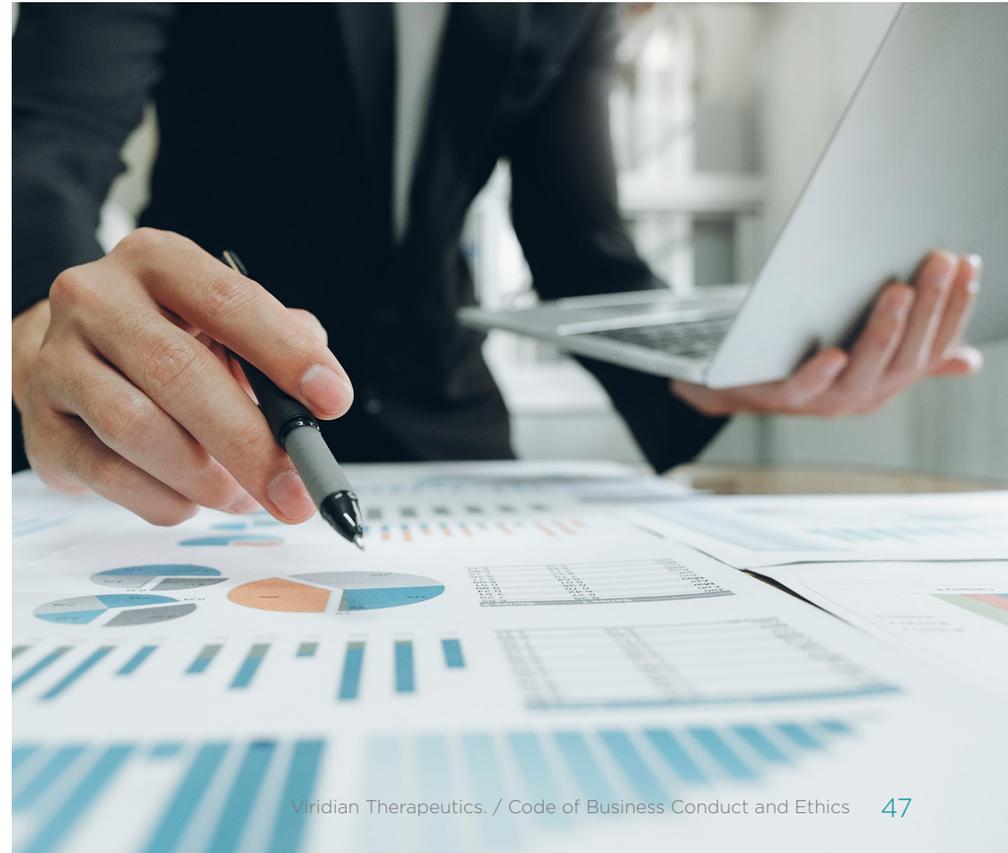
## Records Management

Documents should only be disposed of in compliance with Viridian policies and should never be destroyed or hidden. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to—or in anticipation of—an investigation or audit.

If you have any questions or concerns about retaining or destroying corporate records, please review our policies on document retention. You may also contact Compliance or the Legal Department.

## Full, Fair, and Timely Disclosures

Viridian is committed to meeting its obligations of full, fair, and timely disclosure in all reports and documents that describe our business and financial results, and other public communications.





## DO THE RIGHT THING

- Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.
- Write carefully in all business communications. Write as though someday the records you create may become public documents.



## WATCH OUT FOR

- Records that are not clear and complete or that obscure the true nature of any action.
- Undisclosed or unrecorded funds, assets, or liabilities.
- Improper destruction of documents.



## WHAT IF?

**While reviewing invoices, I noticed an unusually large amount paid to one of our suppliers. No additional documentation was provided, but we've been working with this supplier for a long time without incident. Should I say something?**

Yes, you should. A sudden change to the amount or method of payment could be legitimate or it could be a sign of misconduct. Regardless of a supplier's track record, all transactions should be verified with supporting documentation.



## OUR POLICIES

[Anti-Bribery and Anti-Corruption Policy](#)

# SPEAKING ON BEHALF OF VIRIDIAN

Viridian is committed to maintaining honest, professional, and lawful internal and public communications.

We need a consistent voice when making disclosures or providing information to the public and must ensure only those limited authorized spokespeople (e.g., CEO, CFO, etc.) speak on behalf of Viridian.

Unless you are an authorized spokesperson, refer any communications with the media, investors, stock analysts, and other members of the financial community to Investor Relations and Corporate Communications.



## WATCH OUT FOR

- Giving public speeches or writing articles for professional journals or other public communications that relate to Viridian without appropriate Company review and approvals.
- The temptation to use your title or affiliation outside of your work for Viridian without it being clear that the use is for identification only.
- Invitations to speak “off the record” to journalists or analysts who ask you for information about Viridian or its customers, patients, or business partners.

## Social Media

Every communication about our Company affects our reputation and our brand, so we take care online. We must never post anything that would be considered harassing or discriminatory, and we must never disclose confidential or protected information about our Company, our employees, patients, or business partners.

If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites, or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of Viridian. If you believe a false statement about our Company has been posted, do not respond, even if your intent is to “set the record straight.” Your posting might be misinterpreted, start false rumors, or may be inaccurate or misleading. If you are unsure whether a post or interaction is appropriate, consult Corporate Communications, Compliance, the Legal Department, or the Viridian Hotline before taking action.

## UPHOLDING HUMAN RIGHTS

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights.

Each of us can help support efforts to eliminate abuses, ensuring that labor within our operations and supply chain is freely chosen and fairly compensated.



### DO THE RIGHT THING

- Report any suspicion or evidence of human rights abuses in our operations or in the operations of our suppliers.
- Remember that respect for human dignity begins with our daily interactions with one another, patients, business partners, and customers. It includes doing our part to protect the rights and dignity of everyone with whom we do business.



### WHAT IF?

**When I was visiting a new supplier, I noticed employees working there who seemed underage. When I asked about it, I didn't get a clear answer. What are my next steps?**

You did the right thing first to be on the lookout for human rights abuses and second to raise the issue with our supplier. The next step is to report the incident to Compliance, the Legal Department, or through the Viridian Hotline. We are committed to human rights and to the elimination of human rights abuses including child labor.



## ENGAGING WITH OUR COMMUNITIES

Corporate social responsibility is an integral part of Viridian's culture. We believe in making a positive difference in people's lives and engaging responsibly in charitable activities to make a positive impact in the communities where we live and work. As a Company, we contribute funds, time, and talent to support Company-wide programs and local causes. We encourage (but do not require) you to participate in the many initiatives we support.

Viridian also encourages you to make a difference on a personal level, supporting charitable and civic causes that are important to you. Be sure your activities are lawful and consistent with our policies and that you're participating on your own time and at your own expense.

### WATCH OUT FOR

- Putting pressure on colleagues to participate in personal charitable or volunteer activities.
- Using Viridian funds, assets, or the Viridian name to further your personal volunteer activities.



## OUR POLICIES

### External Funding Policy



## BEING GOOD ENVIRONMENTAL STEWARDS

We recognize our environmental and societal responsibilities. We are committed to sustainability and to minimizing damage to the environment as well as any potential harm to the health and safety of employees, patients, customers, and the public.

Protect employee safety and the environment. Read and understand all the information provided by our Company that is relevant to your job and operate in full compliance with environmental, health, and safety laws and regulations.



### DO THE RIGHT THING

- Fully cooperate with environmental, health, and safety training, and with our Company's periodic compliance reviews of our products and operations.
- Stop work and report any situation that you believe could result in an unsafe working condition or damage to the environment.
- Provide complete and accurate information in response to environmental, health, and safety laws, regulations, and permits.
- Be proactive and look for ways we can minimize waste, energy, and use of natural resources.
- Contact the Head of Facilities if you have any questions about compliance with environmental, health and safety laws, and policies.

## MORE INFORMATION

Do you need additional guidance? Viridian has a variety of resources to contact for help:

<b>Issue or concern</b>	<b>Contact:</b>
To ask questions, report potential misconduct, or other ethical concerns	Your manager/supervisor or a member of senior management <a href="#">Human Resources</a> <a href="#">Compliance</a> <a href="#">Legal Department</a> The Viridian <a href="#">Hotline</a> , or call +1 833 596 6699
For legal questions	<a href="#">Legal Department</a>
To view Company policies	Visit <a href="#">Veeva</a>
For media inquiries	<a href="#">Investor Relations and Corporate Communications</a>
For information security inquiries	<a href="#">Information Technology Department</a>
For general security concerns	Onsite Facilities Staff