



Supplier Code of Conduct

At Insmmed, our business decisions are **Powered By Integrity**. Our ability to successfully deliver much needed medicines to patients depends upon this commitment.

Just as we hold ourselves to high standards of integrity, we expect the same from our suppliers.

A **supplier** is an individual or business entity (vendor, provider, distributor, contractor, sellers, or dealers) that provides goods, services, or resources to Insmmed.

Our **Supplier Code of Conduct** outlines our expectations for suppliers to conduct business legally, ethically, and responsibly – following all relevant laws, regulations, and industry standards.

We are committed to:



Ethical Business
Conduct



Human Rights and
Responsible Labor
Practices



Environment,
Health, and
Safety



Quality and Risk
Management



Commitment to Ethical Business Conduct

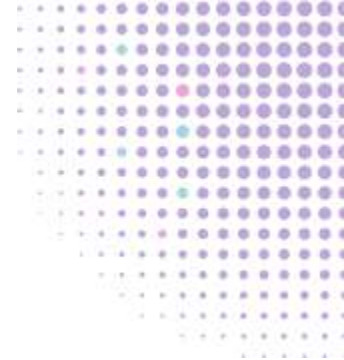
Insmed takes ethical business conduct very seriously, and we expect our suppliers to as well. The following topics speak to our expectations across a range of important areas that aim to keep our business activities ethical, transparent, and compliant with applicable laws and regulations. This section outlines expectations for suppliers in each of these areas:

- Anti-Bribery and Corruption
- Fair Competition
- Marketing and Promotional Practices
- Interactions with Healthcare Professionals
- Animal Research and Welfare
- Scientific and Research Integrity
- Conflicts of Interest
- Patient Safety and Adverse Events
- Data Privacy and Security
- Data Breach Notification





Commitment to Ethical Business Conduct



Anti-Bribery and Corruption:

Insmed does not tolerate bribery or other form of corrupt business behavior. Never engage in any kind of bribery or kickbacks, including promising, offering, providing, authorizing, or accepting anything of value to obtain an unfair business advantage.

We expect our suppliers to fully comply with all applicable foreign and domestic anti-corruption laws.

Bribery occurs when...

someone is persuaded by gifts, payments, or favors to do something they should or should not do. Bribery can also occur when someone requests payment to conduct normal job duties.

Any payment made to expedite a routine action, also known as a facilitation payment, is also considered a bribe and is therefore prohibited.

Fair Competition:

We expect our suppliers to compete fairly and conduct their business consistent with applicable fair competition and antitrust laws. These laws are intended to prevent unfair business practices, such as collusion that harms competition in the market.

Our suppliers shouldn't engage in practices such as price-fixing, bid-rigging with competitors, abuse of market dominance, or other practices that restrict free trading and competition.

Suppliers should refrain from discussing sensitive business information with competitors, such as pricing, sales strategies, production capacities, or any other information that could be used to coordinate anti-competitive behavior.



Commitment to Ethical Business Conduct



Marketing and Promotional Practices:

Marketing and promotional materials and activities should comply with applicable regulations and industry standards and guidelines, such as the Code on Interactions with Healthcare Professionals issued by the Pharmaceutical Research and Manufacturers of America (PhRMA) and the Code of Practice issued by the European Federation of Pharmaceutical Industries and Associations (EFPIA) designed to ensure that information is supported by scientific evidence and consistent with regulatory approvals to prevent misrepresentation of our products' efficacy or safety.

Insmed must approve the use of our Company's name or logo, including any brand names, as well as any marketing claims or other promotional activities. The right to include Insmed's name, logo, brand names, or description of our work together in any publication or any promotional materials may only be granted in certain instances.

Interactions with Healthcare Professionals:

When interacting with healthcare professionals (HCPs) on behalf of Insmed, suppliers should conduct their interactions ethically and in compliance with applicable laws and industry standards and guidelines.

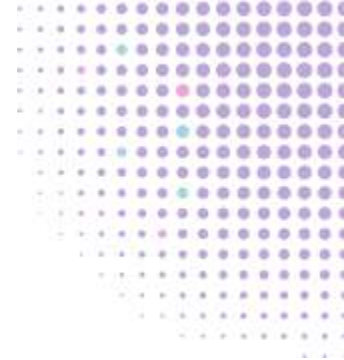
Communications with HCPs should focus on complete and accurate information about our products.

Suppliers should never attempt to sway an HCP's independent medical judgment for Insmed's (or their own) benefit.

Suppliers must also follow Insmed's process for collecting information regarding any financial interactions with HCPs, healthcare organizations, patients, and patient organizations as required based on the engagement.



Commitment to Ethical Business Conduct



Animal Research and Welfare:

We respect and protect the welfare of animals used in research, complying with all legal and Insmed requirements that govern the care and use of animals. Our suppliers share our commitment to the highest standards of animal care in research.

We follow the “3Rs” of animal welfare in research:

Replace: wherever possible, leveraging technologies or approaches that replace the use of animals.

Reduce: limiting the number of animals used in each study to the minimum needed to produce valid results and address critical research questions.

Refine: employing approaches that minimize animals’ pain and distress and improve their welfare.

Scientific and Research Integrity:

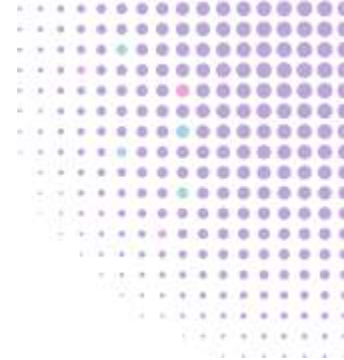
We conduct clinical research and development activities consistent with bioethics principles and sound scientific methodologies, focusing on the safety and well-being of research participants.

Suppliers should follow Insmed’s processes for the handling and publication of scientific information. We only publish scientific information that is accurate, objective, balanced, and timely.





Commitment to Ethical Business Conduct



Conflicts of Interest:

Business decisions must be made in the best interests of Insmmed. Our suppliers should review and assess all engagements for any potential or actual conflicts of interests.

We expect our suppliers to disclose any potential or actual conflicts of interest, as well as have potential mitigation actions in place to prevent conflict of interests from occurring.

It's impossible to list all the different types of **conflicts of interest** that can arise, but here are some examples that you must disclose:

- Owning a financial interest in a competitor or customer of Insmmed.
- Competing with Insmmed in any way, whether it's for the purchase of property or the development of a product.
- Acting on behalf of Insmmed if a family member or close friend is on the other side of the transaction.

Patient Safety and Adverse Events:

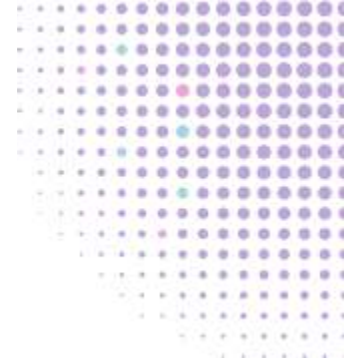
Insmmed puts the health and safety of our patients first. Suppliers should have management systems in place to always ensure the quality and safety of our products.

We comply with all safety and quality regulations that govern our products and report any concerns about our products if they arise. Insmmed expects its suppliers and their employees to report any adverse event, complaint, or side effect related to an Insmmed product to Insmmed's reporting system.

Reports should be made to Insmmed's Drug Safety and Pharmacovigilance (DSPV) and Product Quality Complaint (PQC) contacts in accordance with the supplier's contractual arrangement with Insmmed.



Commitment to Ethical Business Conduct



Data Privacy and Security:

Suppliers should comply with applicable privacy and data protection laws and regulations, including but not limited to, the General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), the Washington My Health My Data Act, and any other relevant local laws.

Suppliers should maintain policies and procedures designed to protect the data of Insméd, Insméd employees, our patients, and HCPs. Our suppliers shall have provisions and standards that ensure the protection, security, and lawful use of confidential information and personal data. In adhering to this requirement, Insméd suppliers will complete an IT Security Questionnaire prior to onboarding.

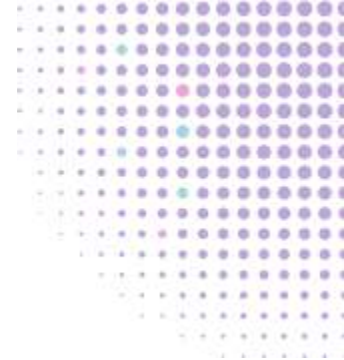
Suppliers providing critical technical services and/or data or processing or storing Insméd data must implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including:

- **Access Controls:** Implementing strict access controls to ensure that only authorized personnel have access to data.
- **Encryption:** Using strong encryption methods to protect data both in transit and at rest.
- **Incident Response:** Establishing and maintaining an incident response plan to address data breaches promptly and effectively.
- **Regular Audits:** Conducting regular security audits and assessments to identify and mitigate potential vulnerabilities.

Personal information is the information we use to identify or contact individuals, such as people's names, personal identification numbers (e.g., Social Security number), driver's license numbers, telephone numbers, addresses, or any other names or codes that are unique to them.



Commitment to Ethical Business Conduct



Data Breach Notification:

In the event of a data breach impacting Insmmed data and/or required notification to a regulatory agency or entity, suppliers must notify Insmmed immediately and provide all necessary information to assess the breach's impact and take appropriate remedial actions. Suppliers must cooperate fully with any investigations and provide timely updates on the breach's status.

Suppliers should refrain from discussing sensitive business information with competitors, such as pricing, sales strategies, production capacities, or any other information that could be used to coordinate anti-competitive behavior.





Commitment to Human Rights and Responsible Labor Practices

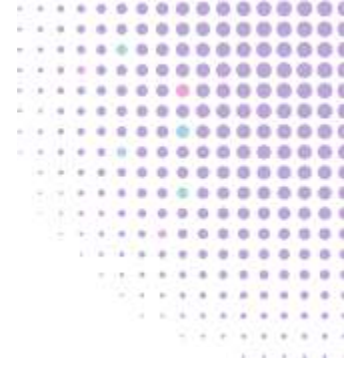
Our suppliers should be committed to upholding the human rights of workers and treating them with dignity and respect. This section outlines expectations for suppliers in each of these areas:

- Voluntary Employment, Anti-Slavery, and Anti-Trafficking
- Child Labor and Young Workers
- Non-Discrimination and Fair Treatment
- Respectful Environment
- Wages, Benefits, and Working Hours
- Freedom of Association





Commitment to Human Rights and Responsible Labor Practices



Voluntary Employment, Anti-Slavery, and Anti-Trafficking:

We believe in a world where everyone works freely and with dignity. Our suppliers are expected to uphold the high standards of voluntary employment, including by prohibiting all forced labor, slavery, and human trafficking.

Employment must be a choice, accompanied by clear advanced notice that communicate rights and responsibilities.

Child Labor and Young Workers:

Suppliers must comply with all applicable child labor laws. If workers under the age of 18 are employed, they must do only work that is not harmful to them and does not interfere with their education. Suppliers should not employ any individuals under the legal local minimum age to work.

Non-Discrimination and Fair Treatment:

Suppliers should provide a workplace free of harassment and discrimination. Discrimination because of someone's race, religion, gender, sexual orientation, ethnicity, disability, political affiliation, union membership, or marital status should never be tolerated.

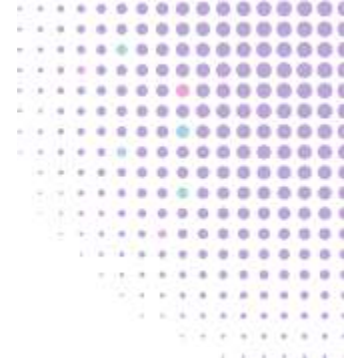
Our suppliers' workplaces should also be safe and free of hostility and harsh and inhumane treatment. They should prohibit corporal punishment, mental or physical coercion, verbal or psychological abuse, and sexual harassment, giving all workers a right to a workplace free of harassment and abuse.

Respectful Environment:

Insméd believes that different opinions, backgrounds, and experiences make us a stronger Company. We expect our suppliers to maintain an inclusive culture where everyone feels respected and heard.



Commitment to Human Rights and Responsible Labor Practices



Wages, Benefits, and Working Hours:

Our suppliers should pay workers according to applicable wage laws where the supplier operates. Employees should be paid at least minimum wage, as well as applicable overtime hours and mandated benefits.

We expect suppliers to communicate with workers the wages to be paid in advance of any work commencing, and whether overtime is required and the wages to be paid for such overtime.

Suppliers should comply with regulations that define maximum working hours and never force employees to work beyond those maximums.

Freedom of Association:

We respect and support the rights of workers to freely associate, organize, and collectively bargain. Our suppliers are expected to foster an environment where workers can engage in these activities without fear of retaliation, intimidation, or harassment.

We believe that open dialogue between workers and management is essential for fostering a collaborative and fair workplace.





Commitment to Environment, Health, and Safety.

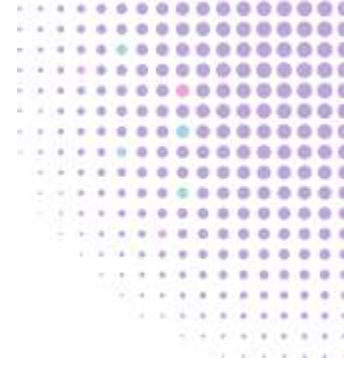
Upholding robust health and safety standards is central to our work. We expect our suppliers to provide their employees with a healthy and safe workplace, including access to clean, safe, and reasonable working conditions. We also recognize our responsibility to the environment and work with suppliers that seek to operate sustainably. This section outlines expectations for suppliers in each of these areas:

- Worker Protection
- Emergency Preparedness and Response
- Environmentally Responsible Practices
- Sustainable Source and Traceability
- Energy and Climate
- Waste and Materials
- Water
- Hazardous Materials and Toxic Emissions
- Biodiversity and Natural Resources





Commitment to Environment, Health, and Safety.



Worker Protection:

We expect our suppliers to take every reasonable precaution to provide a work environment that is free from recognizable hazards for its employees.

We expect our suppliers to adhere to occupational safety standards, including those established by the Occupational Safety and Health Administration (OSHA) or equivalent international regulations.

Suppliers have a responsibility to inform employees of the known physical and health hazards and should ensure a workplace that actively protects employees from unhealthy exposure to chemical, biological, and physical hazards. This includes implementing robust safety protocols and providing comprehensive training on hazard recognition and safe handling procedures. Appropriate protective equipment should be readily available and maintained to safeguard workers from exposure.

Suppliers should establish clear systems for the prompt reporting and investigation of any workplace incidents or exposure-related health issues. Workers should be empowered to report unsafe conditions without fear of retaliation,

ensuring transparency and swift corrective action. Documentation of such reports and the measures taken to address them should be meticulously maintained, supporting continuous improvement in hazard management.

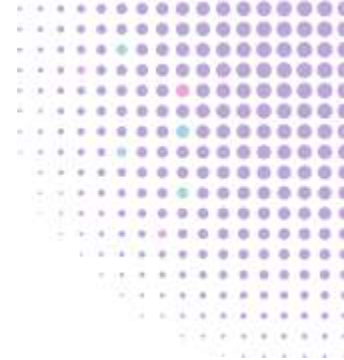
Emergency Preparedness and Response:

Suppliers should identify and assess emergency situations that could arise in the workplace. In planning for emergency situations, it's important to develop and implement emergency plans and response procedures to minimize operational disruption and protect workers.

These can include worker notification and evacuation procedures, emergency training, fire drills, appropriate first aid supplies, and adequate exit facilities. These emergency response items should be employed for any subcontractors on a supplier's site as well.



Commitment to Environment, Health, and Safety.



Environmentally Responsible Practices:

Insmed expects its suppliers to operate in an environmentally responsible manner. Suppliers shall comply with all applicable environmental laws and regulations in countries where they operate.

Suppliers should continuously evaluate their environmental impact through active monitoring and management systems and strive to continuously improve environmental performance.

Sustainable Sourcing and Traceability:

Insmed is committed to sustainable sourcing and traceability, and we ask our suppliers to join us in our effort by responsibly gathering materials and ingredients that meet high environmental and ethical standards. It's crucial that suppliers keep records and trace sourced materials to ensure compliance with legal and sustainability guidelines.

We ask that suppliers determine whether their supply chain includes conflict minerals and provide Insmed with evidence on request that supply chains do not contain such conflict minerals, to help us meet our obligations.

Energy and Climate:

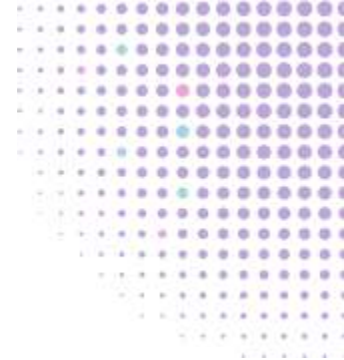
Insmed expects suppliers to measure and report energy consumption and greenhouse gas emissions for their operations. Suppliers should pursue energy efficient initiatives, projects, and/or operations designed to reduce energy consumption. Insmed encourages suppliers to evaluate and pursue renewable energy and/or zero-carbon solutions to reduce greenhouse gas emissions.

Insmed expects suppliers to evaluate risks to their business due to a changing climate. Suppliers should consider if risks are exacerbated due to climate change, or are increasing in severity and frequency, and plan accordingly with mitigation and business continuity strategies.





Commitment to Environment, Health, and Safety.



Waste and Materials:

Suppliers should measure and report the amount of waste generated, waste-to-landfill, as well as waste reused and/or recycled in their operations.

Insméd encourages suppliers to improve efficiency by minimizing requirements for new materials, minimizing waste generation, and improving reuse and recycling.

Water:

Suppliers should measure and report the amount of water withdrawn and/or consumed within their operations.

Suppliers shall comply with all applicable environmental laws, regulations, and permitting requirements regarding water withdrawals and discharges. This may include requirements on monitoring, treating, controlling, managing and properly disposing of wastewater in addition to maintaining required documentation and records.

Insméd encourages suppliers to pursue water efficient initiatives, projects, and/or operations designed to reduce water withdrawals and/or consumption especially for high water stressed areas.

Hazardous Materials and Toxic Emissions:

Suppliers shall comply with all applicable environmental laws, regulations, and permitting requirements regarding hazardous materials and toxic emissions. Those responsibilities include proper handling, identification, monitoring, treating, controlling, storage and disposal in addition to maintaining required documentation and records.

Suppliers should work to reduce and, where possible, eliminate hazardous materials and toxic emissions.

Biodiversity and Natural Resources:

Suppliers shall comply with all applicable laws, regulations, and permitting requirements designed to conserve natural resources, protect ecosystems, and preserve biodiversity.



Commitment to Quality and Risk Management

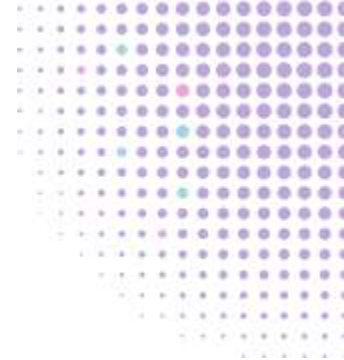
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Commitment to Quality and Risk Management



Business Continuity and Disaster Recovery:

Suppliers providing critical technical services and data or storing/transmitting Inmed data must have robust business continuity and disaster recovery plans in place to ensure the continuous availability of critical services and data. This includes:

Risk Assessment: Conducting regular risk assessments to identify potential threats to business operations and data security.

Contingency Planning: Developing and maintaining contingency plans to address various types of disruptions, including natural disasters, cyber-attacks, and system failures.

Backup and Recovery: Implementing regular data backup procedures and ensuring that data can be quickly and effectively restored in the event of a disruption.

Testing and Drills: Regularly testing and updating business continuity and disaster recovery plans to ensure their effectiveness and readiness.

Communication: Establishing clear communication protocols to keep all relevant stakeholders informed during a disruption.

Legal and Customer Requirements:

Suppliers should identify and comply with applicable laws, regulations, standards, and relevant Inmed requirements, and should maintain documentation and quality management systems in accordance with them.

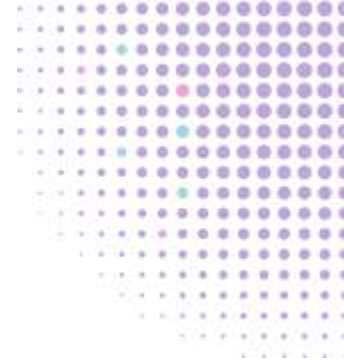
Risk Management:

Suppliers should have mechanisms in place to determine and manage risks in all areas that are discussed in this document. Continually monitor those mechanisms to ensure they are operating appropriately and controlling the risks effectively. Any review should also include assessments of the risks and controls related to work provided by suppliers' own third parties.





Commitment to Quality and Risk Management



Documentation:

Suppliers must maintain documentation needed to demonstrate compliance with the expectations contained in this document and with applicable regulations and reporting requirements.

Supplier Quality Responsibility:

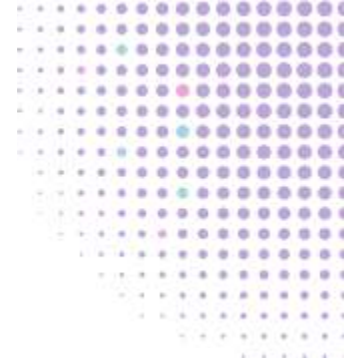
Suppliers should have quality management systems in place to comply with applicable regulatory requirements. By ensuring compliance with applicable regulations and industry standards, suppliers are able to meet Insméd's expectations of delivering safe and high-quality products to our patients. Ensure every product manufactured, tested, or distributed meets and conforms to applicable GxP regulatory standards.

Suppliers shall ensure the integrity of their supply chain, avoiding counterfeiting and adulterations to protect patient products.

Ensuring the **highest level of quality** in our work is crucial to our patient-centric approach.



Commitment to Quality and Risk Management



Communication, Training, and Competency:

Our suppliers' resources should have an appropriate level of knowledge, skill, and ability to achieve the expectation of this Code. Suppliers should ensure there are effective methods to communicate and train on these expectations.

Continuous Improvement:

Insmed expects its suppliers to continually improve in their quality management by establishing performance objectives, executing implementation plans, and addressing identified deficiencies through corrective actions. Monitor performance internal or external assessments, inspections, or management reviews.

Suppliers are also encouraged to continually improve their data privacy and security practices. We value suppliers who proactively seek to enhance their security measures and stay informed about the latest developments in data protection.

Change Control:

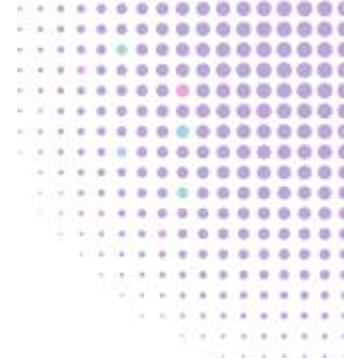
Suppliers should establish and follow rigorous change control procedures to manage any alterations in manufacturing processes, equipment, raw materials, IT Systems, or other critical operations that could impact product quality or compliance.

These procedures should ensure that Insmed is notified of all proposed changes, and these changes are thoroughly evaluated, documented, tested, and approved before they're implemented.

The evaluation process should consider the potential impact on product quality, regulatory compliance, and supply chain continuity, ensuring that any risks are identified and mitigated appropriately.



Commitment to Quality and Risk Management



Reporting to Insmmed:

Suppliers are responsible for promptly reporting any:

- Actual or suspected illegal activities;
- Failures to meet the expectations in this Code;
- Violations of any contractual relationship with Insmmed, including violations committed by any worker or agent acting on behalf of either the supplier or Insmmed;
- Any health authority inspections and/or regulatory issues; and,
- Changes in subcontractors, in accordance with the supplier's governing agreement (e.g., Master Services Agreements, Licenses, etc.).

Reporting responsibility extends to any third parties our suppliers work with on our behalf or on our projects.

Any individual making a report should feel safe to do so without threat or fear of retaliation, intimidation, or harassment. Submit any issues or concerns via any of the channels located on this page.

Questions or concerns regarding compliance with this code should be sent to:

SupplierPortalAdministrator@insmed.com

Please reference Supplier Code of Conduct in the subject line.

Our Insmmed Hotline can be reached at:

[Insmmed.Ethicspoint.com](https://www.insmed.com/Ethicspoint.com)

**or by dialing:
+1-844-539-2347**