



Let Integrity Guide You

Anylam Third Party Code of Conduct



Message from Alnylam's CEO

Alnylam has a long history of curiosity, innovation, and unwavering focus on developing products to help patients around the world. Patients and their families remain at the center of everything we do. We are also committed to supporting our colleagues, honoring the trust placed in us by other stakeholders, and enhancing our broader communities.

Foundational to these priorities is our commitment to conducting business activities with the highest level of integrity. This commitment requires not only absolute compliance with applicable legal standards, but ethical and principled business practices that take into account our broader impact on and obligations to our stakeholders, communities, and environment.

Relationships with ethical suppliers, vendors, service providers, business partners, and their subcontractors (“Third Parties”) are fundamental to our vision of revolutionizing human health through RNAi technology. We expect our Third Parties to share our commitment to integrity, including compliance with all applicable laws and regulations, and adherence to the principles and standards of ethical and responsible business described in this Alnylam Third Party Code of Conduct (“Code”). We expect this Code to express our shared values as we work together to continue delivering transformative medicines to patients with unmet needs around the world.

Best,

Yvonne Greenstreet

Chief Executive Officer

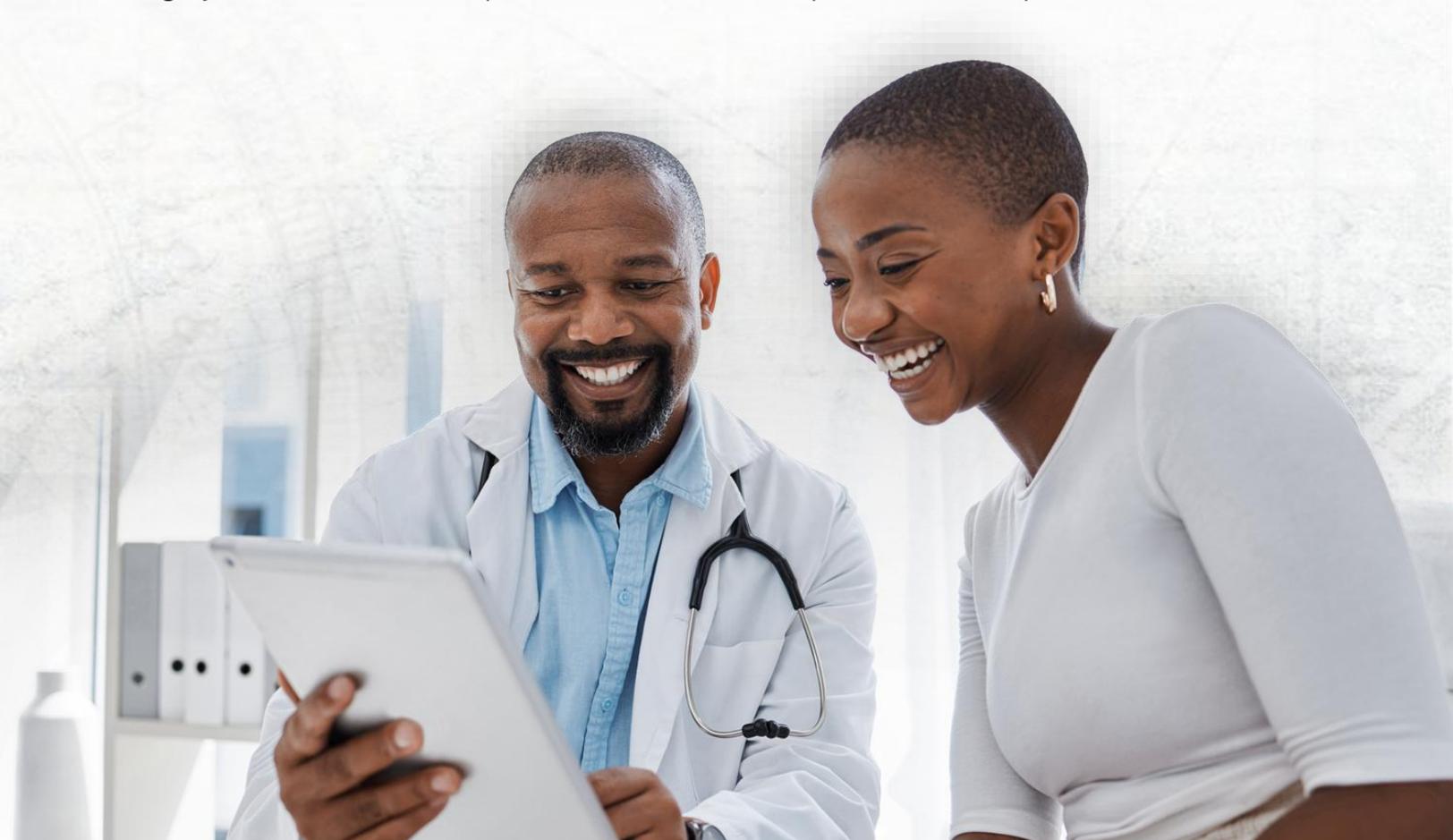




Introduction

At Alnylam, we conduct business consistent with the highest standards of integrity, our Core Values, and all applicable laws and regulations in every country where we operate. We expect the same business conduct from our Third Parties and view this Code as an expression of our shared values. Third Parties must take appropriate steps to communicate the principles and expectations in this Code throughout their organizations and supply chains, as well as with any Third Parties they engage in connection with Alnylam's business, and to undertake proactive efforts to ensure that they are adopted and applied consistently.

It is Alnylam's expectation that all Third Parties comply with both the letter and spirit of this Code, which cannot address every situation, circumstance, or issue that may arise. Alnylam encourages open lines of communications with Third Parties and is available to address any questions at compliance@alnylam.com; concerns of potential misconduct and/or unethical behavior should be raised through this email, directly to the Third Party's business contact at Alnylam, or through Alnylam's Helpline, available by telephone at 1-800-231-8685 or online at helpline.alnylam.com. The Alnylam Helpline allows Third Parties to provide information anonymously if permitted by applicable local laws. We take our responsibility to act lawfully and ethically seriously and depend on the integrity of our Third Parties to protect our business, our reputation, and the patients we serve.





Integrity – It's In Our RNA

Integrity and ethics are at the foundation of all Core Values and are anchored in our culture. Our Core Values define our priorities, inform our business strategies, and guide our decision-making and conduct.

ALNYLAM'S CORE VALUES





Business Conduct and Ethics

Alnylam conducts business ethically and with integrity and expects the same conduct from all Third Parties.

Consistent with this expectation, Alnylam conducts due diligence on all Third Parties before working with them, and continues to oversee and manage the relationships for transparency and compliance throughout their duration. Some Third Parties further undergo an enhanced due diligence process and may be subject to additional oversight and monitoring efforts during the relationship.



Anti-Bribery/Anti-Corruption

Alnylam does not tolerate any form of bribery or corruption, which can compromise the integrity of our science and undermine our mission. Third Parties must comply with all applicable laws, regulations and industry codes governing anti-bribery and anti-corruption, anti-money laundering, lobbying, gifts, payments to public officials, political campaign contributions, and other related activities and regulations. Under no circumstances may a Third Party participate in any corrupt activity, especially in connection with Alnylam's business, whether directly or indirectly, including by promising, offering, giving, accepting, or receiving anything of value for an improper purpose to a private party or government official, and Third Parties must avoid any activity or interaction that could create even an appearance or reasonable perception of impropriety.

Interactions with government officials may raise particular risks given the focus on corruption in the public sphere by enforcement authorities. Accordingly, Third Parties who interact with government officials on Alnylam's behalf must exercise particular caution and be aware that their actions may be more closely scrutinized.



Fair Competition

Alnylam is committed to protecting fair competition through behaviors that enable free and open markets. Third Parties must conduct their business consistent with full and vigorous competition, and strictly adhere to all antitrust and competition laws governing the jurisdictions in which they conduct business, including any rules applicable to government tenders.





Business Conduct and Ethics (continued)



Marketing and Promotional Practices

All marketing and promotional activities and materials, as well as other interactions with healthcare professionals (HCPs) and healthcare organizations (HCOs), must conform to the highest ethical, medical, and scientific standards, and comply with all applicable laws, rules, regulations, local industry codes, and relevant Alnylam guidance provided to the Third Party. Third Parties must ensure that employees interacting with HCPs or HCOs on Alnylam's behalf are properly trained on all relevant products as well as any specific Alnylam guidance provided to the Third Party.

Alnylam and its Third Parties are obligated to conduct all activities and interactions with HCPs and HCOs to enhance the practice of medicine and patient care by focusing on scientific, medical, educational, or product information, and/or supporting medical education and research. Third Parties are not permitted to promote any Alnylam product (or new product indication) prior to obtaining (or updating the) market authorization or an equivalent milestone that triggers lawful promotion in the relevant country (e.g., a positive opinion on pricing and reimbursement).

All promotional interactions with HCPs and HCOs must be transparent and appropriately distinguish themselves from scientific/disease awareness activities. Any transfer of value to an HCP or HCO must have a legitimate business purpose and adhere to all applicable codes and local laws. A Third Party may never offer or provide anything to an HCP or HCO intending to improperly influence or reward a decision or prescribing practice relevant to Alnylam's business or where this could create a reasonable perception of such intent.

In furtherance of these principles, Alnylam requires Third Parties to abide by the following additional guidelines in connection with the below promotional and educational activities:

- **Use of Materials:** Third Parties may only use unaltered materials, including promotional materials, that have been prepared or pre-approved by Alnylam for the particular intended use and audience. If changes are made to approved materials for any reason, including to comply with local laws and regulations, Third Parties must seek updated approval from Alnylam prior to their use.



Business Conduct and Ethics (continued)

- **Engagements with HCPs, HCOs, PAOs, and Patient Advocates:** Third Parties may engage a qualified local HCP, HCO, Patient Advocacy Organization (PAO), or patient advocate only in order to provide services that meet a legitimate business need in connection with Alnylam business, in exchange for fair market value for those services. All engagements must be documented in writing and include an appropriate data processing agreement, if applicable. Services must be provided at locations and venues fit for purpose, which are not lavish or extravagant. Under all circumstances the Third Party must respect the independence and autonomy of the engaged party.
- **Funding, including Grants and Donations:** Third Parties may not make any funding contributions, including grants or donations, relating to therapeutic areas for which Alnylam has developed approved products or is developing investigational therapeutics without Alnylam's prior notice and acknowledgment.



Quality and GxP

Alnylam is committed to delivering safe and effective products that meet or exceed the needs of our patients and customers, complying with all applicable regulatory requirements, and ensuring the integrity of our data. Any Third Party supplying Alnylam with materials or services must comply with all applicable regulations and guidelines relating to quality, including GxP, as well as the quality criteria and technical requirements to which it agreed with Alnylam. This applies to all aspects of the materials or services it provides (e.g., labor, supervision, machinery, equipment, downstream materials, and subcontractors), which must also accord with the parties' supply agreements and comply with this Code.

To this end, as applicable, Third Parties are expected to:

- Ensure appropriate mechanisms for communication between the Third Party's and Alnylam's Quality organizations to ensure that materials and services supplied to Alnylam meet all applicable requirements.
- Hold all required operating permits and licenses.
- Have in place a quality management system sufficient to ensure compliance with all applicable regulations and guidelines, the parties' agreements, and this Code.



Business Conduct and Ethics (continued)



Trade

As a global company, Alylam must comply with applicable trade laws and restrictions around the world, including on trade controls, sanctions, imports and exports, and anti-boycott activities. Third Parties must likewise ensure compliance with these laws when conducting business involving Alylam.





Human Rights & Labor

Alylam cares about its internal, local, and broader communities, and believes every individual deserves fair treatment and respect. We expect that Third Parties share our commitment to human rights, including those of people impacted by their operations, and treat all employees, workers, and suppliers with dignity and respect. At a minimum, Third Parties must honor the rights articulated by the International Bill of Human Rights and memorialized in the Declaration on Fundamental Principles and Rights at Work.

Voluntary Employment

Third Parties may not traffic persons or use forced labor of any kind, including slave, bonded, indentured, or prison labor. All workers must have freedom to enter and exit employment voluntarily.

Child Labor and Young Workers

Third Parties must comply with all applicable laws regarding child labor, including requirements relating to minimum age for workers and working conditions.

Fair Treatment & Non-Discrimination

All Third Parties must strive to provide a fair and ethical work environment, including a workplace that is free from discrimination, harassment, and bullying. Discrimination by Third Parties is not permitted based on race, ethnicity, gender, gender identity, color, national origin, religion, age, sexual orientation, disability, political affiliation, marital status, or any other legally protected characteristic. Third Parties may not permit intimidation or inhumane treatment of workers, whether through sexual harassment, verbal or sexual abuse, corporal punishment, or physical or mental coercion.

Wages, Benefits, and Working Hours

Third Parties must abide by all applicable laws on wages, including minimum wages, overtime, and mandated benefits, and clearly communicate this information with workers.

Freedom of Association

Third Parties must respect the legally protected rights of workers to associate freely, join or not join labor unions, seek representation, and join workers' councils. Workers must be able to communicate openly with management regarding working conditions without threat of retaliation in any form.



Environment, Health & Safety

Alnylam's work is dedicated to improving the health of humanity, and we are likewise committed to the health of our environment and our workers. We expect our Third Parties to share Alnylam's commitment to business practices that seek to improve the sustainability of our planet, including through sustainable use of natural resources and minimizing waste; to preserve the wellbeing of our workers; and to ensure the safety of our workplaces. At a minimum, this means complying with all applicable environmental and health and safety laws and regulations.

Environmental Authorizations

Third Parties must comply with all applicable environmental regulations, or substantially conform with international consensus standards and systems where regulations are absent. Third Parties must obtain and retain all required permits, licenses, information registrations, and restrictions, and comply with all associated operational and reporting requirements.

Waste and Emissions; Spills and Releases

Third Parties must maintain systems to ensure safe handling, moving, storage, recycling, reusing, and managing of waste, air emissions, and wastewater discharge; and to prevent and mitigate accidental spills and discharges into the environment. Any waste, emissions, or wastewater with the potential to negatively impact human health must be controlled and treated prior to its release into the environment.

Worker Protection & Hazards

Third Parties must comply with all applicable occupational health and safety regulations, or substantially conform with international consensus standards and systems where regulations are absent. Third Parties must provide a safe and healthy working environment, including for any company-provided living quarters, and maintain acceptable exposure levels to protect workers from chemical, biological, physical, and environmental hazards. Workers must have access to safety information relating to hazardous materials, particularly pharmaceutical compounds and pharmaceutical intermediate materials.

Process Safety & Emergency Preparedness

Third Parties must identify the risks from chemical and biological processes and have programs to prevent, mitigate or respond to catastrophic events, including but not limited to releases of chemicals or biological agents, fires, and explosions. Likewise, Third Parties must identify and assess other potential emergency situations in the workplace and associated areas and take proactive measures to minimize their possible impact.



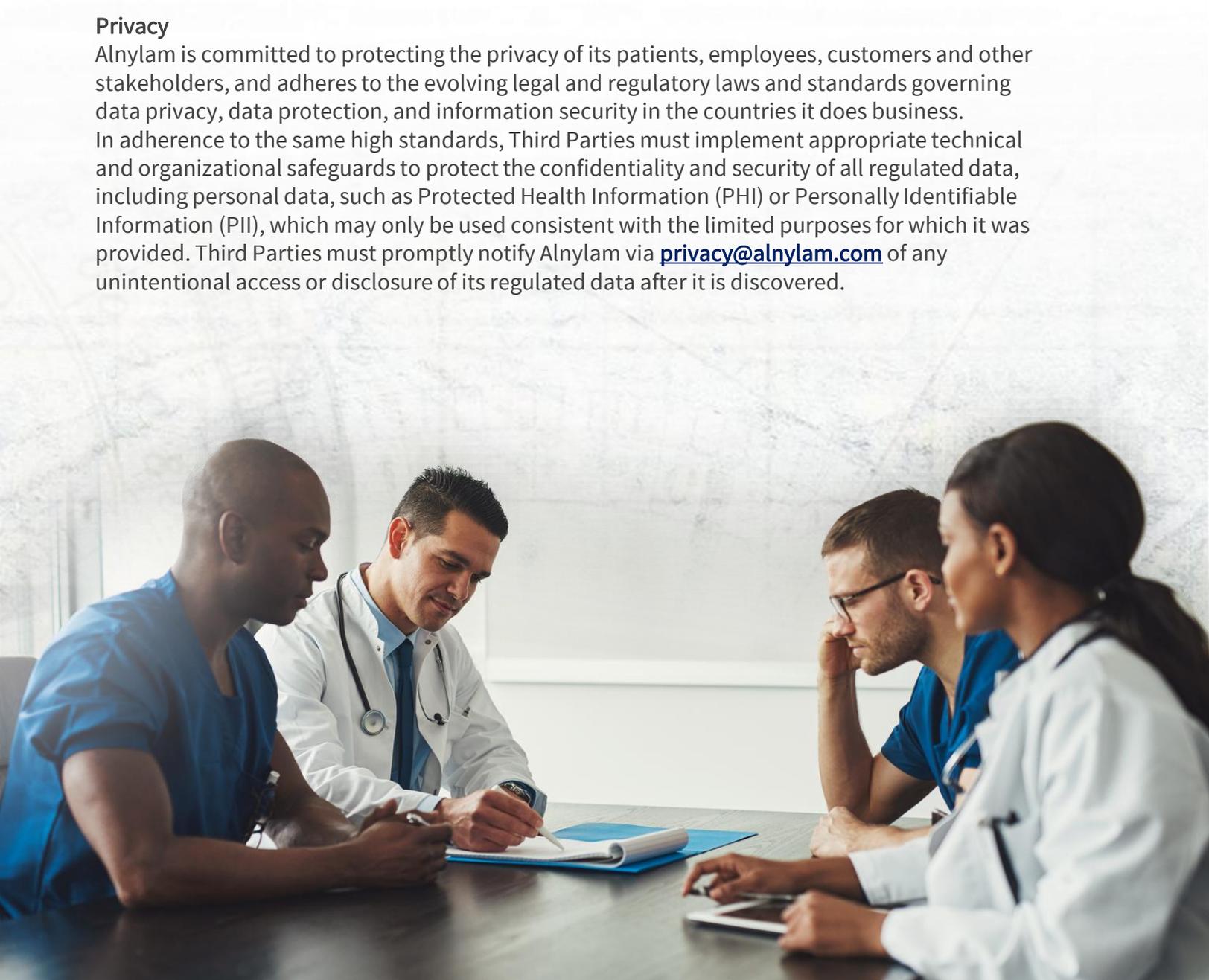
Confidential Information and Privacy

Confidential Information and Intellectual Property

Third Parties with access to any of Alnylam's confidential or proprietary information, or intellectual property, are required to safeguard it as they would their own, and in compliance with any applicable confidentiality agreements. Unless explicitly permitted by contract, Third Parties may not disclose or share this information with any other Third Party without prior written approval from Alnylam.

Privacy

Alnylam is committed to protecting the privacy of its patients, employees, customers and other stakeholders, and adheres to the evolving legal and regulatory laws and standards governing data privacy, data protection, and information security in the countries it does business. In adherence to the same high standards, Third Parties must implement appropriate technical and organizational safeguards to protect the confidentiality and security of all regulated data, including personal data, such as Protected Health Information (PHI) or Personally Identifiable Information (PII), which may only be used consistent with the limited purposes for which it was provided. Third Parties must promptly notify Alnylam via privacy@alnylam.com of any unintentional access or disclosure of its regulated data after it is discovered.





Transparency

Conflict of Interest

Alnylam expects its Third Parties to make business decisions based exclusively on good business judgment, and free from actual or potential conflicts of interest. A conflict of interest may arise any time a Third Party's personal interests could interfere, or be perceived to interfere, with its ability to make objective decisions and act in Alnylam's best interest. Any actual, potential, or perceived conflict of interest must be disclosed immediately to the Third Party's business contact at Alnylam, through Alnylam's Helpline at helpline.alnylam.com, or compliance@alnylam.com.

Gifts, Meals, Hospitality and Entertainment

Offering or providing gifts, meals, hospitality or entertainment to someone, whether an Alnylam employee, HCP, government official, or private party, may create a conflict of interest as well as other risks. Third Parties may provide gifts (except for gifts of cash or cash equivalents (e.g., gift cards), which are always prohibited), meals, hospitality and entertainment in connection with Alnylam business only when such items are: (1) lawful and ethical under local laws and regulations; (2) occasional and nominal in value; (3) provided with at least one Third Party representative present (except for gifts); (4) incidental to a legitimate business purpose; and (5) not intended to, and could not reasonably be perceived as intended to, serve any improper purpose, including to improperly influence a pending or prospective business decision, or as a reward for a past decision. In any case, Third Parties must not provide any gifts to HCPs or government officials.

Third Parties also should be aware that Alnylam employees are only permitted to accept gifts, meals, hospitality, and entertainment from a Third Party under certain circumstances per internal policy. Alnylam employees are prohibited from accepting any gifts or entertainment from a Third Party with which Alnylam is actively engaged in sourcing, contract negotiations, or award reviews, or in the time period immediately prior to or after such events; such gifts and entertainment may be viewed as intending to improperly influence or to reward a business decision, for example, to secure favorable contract terms.

Interactions with Patients and Patient Advocacy Organizations (PAOs)

Alnylam believes that open dialogue and transparent exchange of information among all stakeholders in the healthcare community is vital to advancing patient access to healthcare. Third Parties are thus required to respect the HCP-patient relationship, and must never offer medical advice, recommend treatment options, or promote Alnylam's products to patients or PAOs (unless permitted by local law).



Transparency (continued)

Transparency Reporting

Transparency legislation or codes in several countries require Alylam to disclose certain transfers of value to Third Parties, including payments to HCPs, HCOs, and PAOs. Third Parties that interact with HCPs, HCOs, and PAOs in connection with Alylam business must ensure that all transfers of value are compliant and accurately memorialized in records provided to and sufficient for Alylam to meet its transparency reporting obligations, as well as the Third Parties' own transparency obligations, as applicable. Third Parties that provide transfers of value to any HCP, HCO, or PAO on Alylam's behalf must contact transparency@alnylam.com for additional information and training on how to share these transfers of value with Alylam's Transparency team.

Accurate Books and Records

Third Parties must keep books and records that fully and accurately reflect all business information, including transactions and payments relevant to Alylam, as well as supporting documentation necessary to comply with all applicable laws and demonstrate conformance with this Code. Alylam expects Third Parties to provide accurate invoices that meet all contractual requirements, including details on services provided, related expenses incurred, and supporting documentation sufficient for Alylam to verify payment to the Third Party is appropriate.





Management Systems

Third Parties must use management systems to facilitate ongoing compliance with and improvement on the guidance provided by this Code, including mechanisms for:

Commitment and Accountability

Third Parties must demonstrate commitment to the principles and concepts in this Code by allocating appropriate resources.

Risk Management & Continual Improvement

Third Parties must have mechanisms for identifying and managing risks, and continually improving on areas addressed by this Code. This includes setting and following through on performance objectives, and promptly undertaking corrective action to address potential weaknesses identified by assessments, inspections, and management reviews.

Compliance with Legal and Customer Requirements

Third Parties must identify and comply with applicable laws, regulations, standards and relevant customer requirements.

Training and Competency

Third Parties must implement training that achieves an appropriate level of knowledge, skills, and abilities in management and workers to address this Code's expectations.

Fraud Prevention and Reporting

Third Parties must implement robust fraud prevention and reporting programs, and report to Alylam all potential fraud involving Alylam's business, regardless of materiality. Reports may be made directly to the Third Party's business contact at Alylam or through Alylam's Helpline, available by telephone at 1-800-231-8685 or online at helpline.alnylam.com.

Identifying and Handling Concerns; Non-Retaliation

Alylam expects its Third Parties to foster a culture of open communication, and to establish formal reporting structures and other channels for workers to report concerns or potentially unlawful activities in the workplace. Third Parties must establish a process for investigating or otherwise addressing each reported concern and implementing responsive corrective action as needed.

Third Parties must strictly adhere to Alylam's non-retaliation policy. Alylam does not permit retaliation or harassment for good-faith reporting of concerns, and will not work with Third Parties who threaten or engage in this behavior.



Management Systems (continued)

Business Continuity

Third Parties are responsible for designing, implementing, and maintaining business continuity plans that minimize disruption to Alnylam's business and impact on Alnylam's reputation, including by promptly recovering and restoring partially or completely interrupted functions that are critical to ongoing work with Alnylam.

