

Our Human Rights Principles and Commitments

Overview

Alnylam's commitment to human rights aligns with our Core Values and our responsibility as a good corporate citizen. This commitment ensures the highest level of ethical, compliance, and legal standards in all we do, consistent with Alnylam's Code of Business Conduct and Ethics. Alnylam is dedicated to developing a culture that responsibly acts to address human rights-related issues relevant to our company and the stakeholders we serve.

Alnylam respects human rights of individuals and communities wherever we operate, consistent with the UN Guiding Principles on Business and Human Rights, UN Global Compact, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights, International Labor Organization Declaration on Fundamental Principles and Rights at Work, Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises on Responsible Business Conduct, and other relevant documents and frameworks.

We abide by the principles and ethical commitments described below and in our Code of Business Conduct and Ethics, carrying out the highest standards globally. In addition, Alnylam is committed to engaging only those third parties who embrace standards of ethical behavior consistent with our own, as outlined in Alnylam's Third Party Code of Conduct for our suppliers and business partners.

Non-Discrimination

We are committed to a work environment free from discrimination, harassment, and retaliation. Our workplace provides equal opportunity to all applicants and employees regardless of race, color, religion, gender, age, national origin, ethnicity, marital status, sexual orientation, gender identity or expression, disability, or military status. We believe our workforce should reflect the diversity of the communities where we operate. We are committed to training regarding diversity, equity, and inclusion, and the importance of decreasing bias in the workplace for current and future employees.

Safe and Healthy Workplace Conditions

We are committed to ensuring all employees and contractors have safe and healthy workplaces free from significant risks. Everyone has the right to work without the risk of harm to their health or physical being. We strive to maintain a workplace with zero incidents, and we take seriously all injuries and occupational illnesses. We also actively promote outside-of-work health and well-being for our employees through our benefits and wellness packages globally.

Workplace Security

We are committed to maintaining a workplace that is free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal or external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

Freedom of Association and Collective Bargaining

We strive to always keep an open dialogue with our employees. We respect our team members' right to associate with any group they choose, consistent with all local laws.

No Forced Labor

We prohibit forced labor in any form. We recognize that modern slavery is a concern in a variety of industries, and we work to ensure our suppliers and business partners do not engage in forced labor, modern slavery, or human trafficking of any kind. Under the California Transparency in Supply Chains Act of 2010, we annually disclose in our ESG Report our efforts related to supplier and business partner policies and procedures, as well as our internal human resources standards in place, to ensure fair labor practices. Fair labor practices include protections against destroying, concealing, or confiscating immigration documents, using fraudulent recruiting tactics, or charging recruitment fees. Our Third Party Code of Conduct further outlines the expectations we set for our suppliers and business partners in this area.

No Child Labor

We prohibit child labor across our business and supply chain. Suppliers and business partners shall never employ children, recognizing the minimum age for employment or work shall be 16 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher.

Fair Compensation

We are committed to providing compensation in our company that is sufficient to meet the needs of our employees and their families. We require our suppliers and business partners to pay at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition, we require workers to be compensated for overtime hours at the rate required by applicable laws and regulations.

Reasonable Accommodations

We provide reasonable accommodations for individuals with disabilities and for those with specific cultural and religious needs. We provide accommodation surrounding pregnancy, childbirth, nursing, and other related conditions. We work to make our in-person locations and online communications accessible to all audiences.

Respecting Privacy and Protecting Personal Data

We are committed to protecting the personal data and privacy of our employees, patients, customers, and other stakeholders. We recognize that mishandling personal and sensitive data can cause harm to individuals, potentially leading to stigma, embarrassment, and discrimination. As a part of our commitment to human rights, we ensure that personal data is collected, used, shared, and disposed of responsibly and that personal data is handled in accordance with the highest standards globally.

Human Rights in Clinical Trials

We are committed to ensuring our clinical trials consider informed consent for all participants and directly address the benefits and risks of our processes for all participants. We are also committed to ensuring our clinical trials are designed to ensure the rights, safety, privacy and well-being of participants and that we adhere to all applicable laws and regulations. We are committed to designing our clinical trials so that participants reflect the racial and ethnic diversity of the epidemiology of the disease we intend to treat. We know those who are underrepresented in healthcare are also often underrepresented in clinical research. We work to ensure the rights and accessibility requirements of all populations are considered in our clinical trial processes.

Human Rights in R&D and Medical Innovation

We work to create important innovations in our industry and are committed to ensuring the intellectual property rights related to our advancements in science are protected.

Patient Access and Affordability

We believe that together with partners in the healthcare ecosystem, we can reduce barriers to our medicines to improve outcomes for all stakeholders in the patient journey – most importantly, for the patients who may benefit from them. We believe biopharmaceutical companies must address access and improve outcomes from the time of drug discovery. We recognize that a patient's ability to access and afford our medicines is complex, and we commit to continuing our legacy of value-centric solutions.

We seek to remove barriers within our control to enable patients to receive care in convenient settings.

Speak Up and Helpline

We are committed to fostering an environment where employees feel safe to speak up and express their ideas, concerns, and issues, without fear of retaliation. All Alnylam managers and leaders employ an open-door policy that encourages team members to bring questions or concerns to their direct leadership. While Alnylam colleagues are encouraged to discuss questions or concerns with their manager, there may be times when other or additional avenues may be appropriate. Accordingly, as needed, colleagues may reach out to peers or other managers or leaders, including department heads or any other manager in the company, or to Human Resources, Legal, or Ethics & Compliance.

All colleagues have access to channels of communication other than open-door discussions, such as a department-designated e-mail box (e.g., Compliance@alnylam.com or AskHR@alnylam.com) or the company's reporting Helpline, which allows for anonymous reporting (unless otherwise limited by local law). The Helpline is available 24 hours a day, 7 days a week, 365 days a year, online at helpline.alnylam.com or by phone at 1-800-231-8685. International dialing instructions and local phone numbers for countries outside of the United States can be found by visiting the Helpline online. In some of the countries in which we operate, additional procedures, options, and guidance for reporting concerns may be provided in local policies and/or procedures to account for applicable local laws.