

Regeneron Pharmaceuticals, Inc. Vendor Code

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I. Introduction

Regeneron Pharmaceuticals, Inc., and its controlled affiliates and directly or indirectly wholly-owned subsidiaries (collectively, “Regeneron”) are committed to conducting their business in accordance with all applicable laws and with the highest ethical standards.

This Vendor Code (“Code”) is aligned with Regeneron’s standards and with the Pharmaceutical Industry Principles for Responsible Supply Chain Management and, therefore, represents our expectations and those of our industry for sustainable performance in the biopharmaceutical industry. The Code shall apply to Regeneron vendors, which means any organization or individual with whom Regeneron has commercial dealings, including entities that provide a product or service to, or on behalf of Regeneron (“Vendors”). We understand that Vendors are independent entities, but the business practices and actions of a Vendor may significantly impact and/or reflect upon Regeneron. Regeneron therefore expects all Vendors and their employees, agents and subcontractors to understand and adhere to this Code while they are conducting business with and/or on behalf of Regeneron.

In the event of any inconsistency or conflict between this Code and any applicable agreement governing the relationship between Regeneron and any Vendor (the “Agreement”), the terms, conditions and provisions of the Agreement shall govern and control.

We recognize that our Vendors provide Regeneron with quality products and services every day and that they play an important part of our overall success. Regeneron thanks all of its Vendors for their shared commitment to doing the right thing.

II. Ethics

All Vendors are expected to maintain the highest standards of integrity and conduct their business in an ethical manner in full compliance with all applicable laws and in accordance with the principles of this Vendor Code.

Regeneron expects Vendors to comply with all legal and regulatory requirements regarding ethics, including those relating to the following areas:

Business Integrity and Fair Competition

All corruption, extortion and embezzlement are prohibited. Vendors shall not pay or accept bribes or participate in other illegal inducements in business or government relationships. All Vendors are required to fully comply with all applicable anti-corruption and anti-bribery laws, including, without limitation, the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.

Vendors shall conduct their business in a manner consistent with fair and vigorous competition and in compliance with all applicable anti-trust laws. Vendors shall employ fair business practices, including accurate and truthful advertising.

Ineligible Vendors

Regeneron will not conduct business with any Vendor if any of the Vendor's officers, directors, or employees are or becomes excluded from, debarred by, or ineligible to participate in any United States governmental contracting program or is listed on any U.S. Department of the Treasury, Office of Foreign Assets Control Sanctions Program, including any Specially Designated Nationals or Blocked Persons.

Identification of Concerns

Vendors are encouraged to report concerns or illegal activities in connection with their relationship with Regeneron. Regeneron will review the concerns and respond to them appropriately.

Vendors may raise compliance concerns through Regeneron's compliance hotlines available at <http://regeneron.ethicspoint.com/media/en/gui/20640/index.html> or (877) RGN-ETHX.

Animal Welfare

Animals should be treated humanely with pain and suffering minimized. Animal testing should be performed after reasonable consideration to replace the use of animals, reduce the numbers of animals used, or to refine procedures to minimize pain and suffering of the animals involved. Alternatives should be used wherever scientifically appropriate and acceptable to regulators.

Data Protection

Vendors who have access to and manage Regeneron's personal and confidential data must act in accordance with industry standards and applicable privacy and data protection laws. Any information regarding Regeneron operations and personal data shall be treated as strictly confidential at all times and Vendor shall not exchange or otherwise disclose such data to any third party. Regeneron data should not be used for any purpose beyond the scope of the business arrangement without prior authorization.

Conflict of Interest

Vendors must avoid transactions or relationships that are or appear to be conflicts of interest. Vendors shall notify Regeneron immediately in the event of a potential or actual conflict of interest.

Clinical Trials

If conducting clinical trials, Vendors are expected to do so in accordance with all applicable international guidelines, national and local laws and regulations, as well as the strictest medical, scientific and ethical principles.

Adverse Event and Product Complaint Reporting

An Adverse Event (AE), Special Situation, or Product Complaint (PC) associated with the use of a Regeneron Product can be reported to Regeneron via email to medical.information@regeneron.com or phone at 1-844-REGN-MID (1-844-734-6643). Alternatively, our regional contact information for AE-PC reporting can be found here: <https://www.regeneron.com/downloads/medical-info-global-contact>.

Contractors should refer to obligations as set forth in their respective contracts.

Transparency Reporting

Vendors who make payments to health care providers, patient organizations, hospitals, teaching organizations and other medical organizations on behalf of Regeneron (e.g., contract research organizations) shall retain records and provide them to Regeneron in a manner that enables Regeneron to meet its reporting requirements under international and national transparency reporting laws, subject to the terms of any Agreement.

Gift Giving Guidelines

Acceptable gifts/entertainment from external vendors:

Token gifts of food (cookies, fruit, candy, etc.) that can be shared with others in the office. Gifts of nominal value (e.g., pens, notepads, calendars), reasonable meals, and entertainment in the course of a bona fide business relationship.

Unacceptable gifts/entertainment from external vendors:

Gifts that are illegal or would result in a violation of the law. A “quid pro quo” (“this for that”) agreement requiring or implying something in return for a gift or entertainment. Any gifts in cash or cash equivalents of any amount. Lavish gifts intended to influence a business decision, such as Superbowl tickets or travel tickets. Entertainment or gifts that might compromise the Company if they were to receive public scrutiny (visits to casinos, etc.).

III. Labor

Vendors shall be committed to upholding the human rights of workers in accordance with applicable laws and to treating them with dignity and respect. Regeneron expects Vendors to comply with all legal and regulatory requirements regarding fair and equitable treatment of employees, including:

Freely Chosen Employment

Vendors shall not use forced, bonded, indentured, involuntary prison labor or human trafficking.

Child Labor and Young Workers

Vendors shall not use child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above the applicable country’s legal age for employment or the age established for completing compulsory education. Employee files should be maintained with adequate data to verify ages of employees.

Non-Discrimination

Vendors shall provide a workplace free of harassment and discrimination. Harassment or discrimination for reasons such as race, color, age, gender, gender identity, sexual orientation, ethnicity, disability, physical characteristics, pregnancy, religion, political affiliation, union membership, or marital status is not to be condoned or tolerated.

Vendor shall, and shall cause its subcontractors to, take good faith actions to further Service-Disabled Veteran-Owned Business (“SDVOB”) as well as Women and Minority Owned Business Enterprise (“M/WBE”) business opportunities by actively and affirmatively soliciting bids for Goods and Services and subcontracts from qualified M/WBE and SDVOB vendors, and document and maintain records of bid solicitation and actions of subcontractors taken with respect thereto.

Regeneron expects Vendors to share its commitment to equal opportunity in employment and its commitment to employee diversity.