REGENERON PHARMACEUTICALS, INC.

Vendor Code

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. 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:

a. 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.

b. 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 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.

c. 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 EthicsPoint: http://regeneron.ethicspoint.com/media/en/gui/20640/index.html or through the Regeneron Hotline (877-RGN-ETHX).

d. 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.

e. Privacy

In accordance with the terms of any Agreement, Vendors shall respect Regeneron's proprietary and confidential information and shall not exchange or otherwise disclose such information to any third party. In accordance with the terms of any Agreement, any information or data regarding Regeneron operations shall be treated as strictly confidential at all times unless that information is in the public domain and any Regeneron, worker and patient privacy rights, as well as any Regeneron intellectual property rights shall be protected.

f. 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.

g. 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.

h. 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.

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:

a. Freely Chosen Employment

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

b. 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.

c. 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.

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

d. Fair Treatment

Vendors shall provide a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers or threat of any such treatment.

e. Wages, Benefits and Working Hours

Vendors shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits, in accordance with the laws of the country of employment.

Vendors shall communicate to the worker the basis on which they are being compensated in a timely manner. Vendors are also expected to communicate to the worker whether overtime is required and the wages to be paid for such overtime. Vendors shall keep accurate records regarding employee working hours as required by the laws of the country of employment.

f. Freedom of Association

Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged.

Vendors shall respect the rights of workers, as required by local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

IV. Health and Safety

Vendors shall provide a safe and healthy working environment, and if applicable, safe and healthy company-provided living quarters.

Regeneron expects Vendors to comply with all standard, legal and regulatory requirements regarding employee health and safety, including in the following areas:

a. Worker Protection

Vendors should take commercially reasonable measures to protect workers from illegal or unreasonable exposure to chemical, biological and physical hazards, or excessively physically demanding tasks in the workplace and in any company-provided living quarters.

b. Process Safety

Vendors shall have programs in place to prevent or mitigate catastrophic chemical or biological releases.

c. Emergency Preparedness and Response

Vendors are expected to identify and assess emergency situations in the workplace and any company-provided living quarters, and minimize their impact by implementing emergency plans and response procedures.

d. Hazard Information

Vendors shall make available safety information relating to hazardous materials in the workplace – including pharmaceutical compounds and pharmaceutical intermediate materials – to educate, train and protect workers from hazards.

e. Diversion

Vendors shall notify Regeneron immediately if they become aware of any counterfeit, illegally diverted or stolen Regeneron materials, or if they are offered the opportunity to purchase any such materials.

V. Environment

Vendors are expected to operate in an environmentally responsible manner and to strive to minimize adverse impacts on the environment. Vendors are encouraged to conserve natural resources, to avoid the use of hazardous materials where reasonably possible under the circumstances and to engage in activities that reuse and recycle.

Regeneron expects Vendors to comply with all applicable laws, regulations, rules, permits, license approvals and court orders regarding the environment and the use of restricted substances, including in the following areas:

a. Environmental Authorizations

Vendors shall obtain all required environmental permits, licenses and registrations, and comply with all applicable operational and reporting requirements contained therein.

b. Waste and Emissions

Vendors are expected to have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health should be appropriately managed, controlled and treated prior to release into the environment.

c. Spills and Releases

Vendors are expected to have systems in place to prevent and mitigate accidental spills and releases to the environment.

VI. Management Systems

Vendors are expected to use quality management systems to facilitate continual improvement and adherence to the principles outlined in this Code.

The quality management systems elements should include:

a. Commitment and Accountability

Vendors are expected to demonstrate commitment to the principles described in this Code by allocating appropriate resources.

b. Legal and Customer Requirements

Vendors shall identify and comply with all applicable laws, regulations, rules, permits, licenses, approvals, court orders, standards and relevant Regeneron requirements.

c. Risk Management

Vendors are expected to have mechanisms to determine and manage risks in all areas addressed by this Code.

d. Documentation

Vendors shall maintain documentation necessary to demonstrate conformance with these principles and compliance with applicable laws, regulations, rules, permits, licenses, approvals, court orders, standards and relevant Regeneron requirements.

Subject to the terms of any written contract duly executed by Regeneron and a Vendor, Vendors shall provide all accurate and detailed information on submitted invoices as instructed by Regeneron.

e. Training and Competency

Vendors are expected to have a training program that achieves an appropriate level of knowledge, skills and abilities in management and workers to perform the service(s) that Regeneron has requested.

f. Continual Improvement

Vendors are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary actions to correct deficiencies identified by internal or external assessments, inspections and management reviews.

VII. References and Bibliography

Some suggested reference materials for Vendors regarding concepts covered in this Code are as follows:

General	• Pharmaceutical Supply Chain Initiative: https://pscinitiative.org/home • United Nations Global Compact: http://www.unglobalcompact.org • Universal Declaration of Human Rights: http://www.un.org/en/universal-declaration-human-rights/ • International Committee for Harmonization Guideline for Good Clinical Practice: https://www.ich.org/fileadmin/Public_Web_Site/ICH_Products/Guidelines/Efficacy/E6/E6_R1_Guideline.pdf • Regeneron Code of Business Conduct and Ethics: http://www.regeneron.com/culture-integrity
Ethics	• Declaration of Helsinki: https://www.wma.net/policies-post/wma-declaration-of-helsinki-ethical-principles-for-medical-research-involving-human-subjects/ **Anti-Bribery** • OECD Anti-Bribery Convention • US Foreign Corrupt Practices Act 1977 • UK Bribery Act 2010 **Ineligible Vendors** • U.S. Department of the Treasury, Office of Foreign Assets Control – Sanctions Program: https://www.treasury.gov/resource-center/sanctions/Pages/default.aspx **Animal Welfare** • Guide for the Care and Use of Laboratory Animals, 8th Edition (©2011) National Research Council (NRC), Washington DC, USA • Guide for the Care and Use of Agricultural Animals in Agricultural Research and Teaching, 3rd Edition (2010), Federation of Animal Science Societies (FASS), Champaign IL, USA • European Directive 2010/63/EU (PE-CONS 37/10) of the European Parliament and of the Council of the European Union on the

	Protection of Animals used for Scientific Purposes (2010)
Labor Rights	**Freely Chosen Employment** • International Labor Organization ("ILO") Conventions 29 and 105: http://www.ilo.org/global/lang--en/index.htm **Child Labor** • ILO Conventions 138 and 182: http://www.ilo.org/global/lang--en/index.htm **Non-Discrimination** • ILO Conventions 111 and 100: http://www.ilo.org/global/lang--en/index.htm • International Convention on the Elimination of All Forms of Racial Discrimination http://www.ohchr.org/EN/ProfessionalInterest/Pages/CERD.aspx • Convention on the Elimination of All Forms of Discrimination Against women: http://www.ohchr.org/en/hrbodies/cedaw/pages/cedawindex.aspx **Wages, Benefits and Working Hours** ILO Conventions 131, 95, 14 and 1: http://www.ilo.org/global/lang--en/index.htm **Freedom of Association** ILO Conventions 87 and 98: http://www.ilo.org/global/lang--en/index.htm
Health, Safety & Environment	• OHSAS 18001 • ISO 14001 Environmental Management Systems standard • ISO 50 000 Energy Management Systems standard