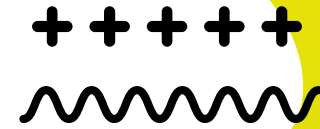


Sustainability Infosheet 2022

Compliance & business ethics



indonesia



Responsible business is vital to our long-term success, with Compliance & business ethics emerging as one of the highest priority themes from our 2020 materiality analysis.

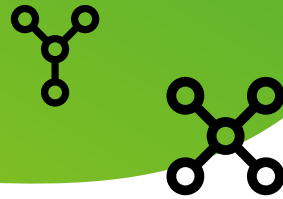
Our commitment to doing business ethically and responsibly is an essential part of Idorsia's culture, which is highlighted in **our company behaviors** and role-modeled by **our leaders**. To formalize this commitment, we have put in place a number of internal codes and processes to ensure compliance with external legal requirements from health authorities and other regulators in the countries where we operate. We do not tolerate any violation of external regulations or internal codes.

We have established internal frameworks and mechanisms to ensure compliance and maintain high standards of business ethics across the company. These include our

- **Code of Business Conduct,**
- **Anti Corruption and Anti-Bribery Policy,**
- **Whistleblower Protection Policy,**

and Enterprise Risk Management system. In addition, we have developed industry-specific frameworks in key areas of our business, such as Responsible Marketing Management and Product Stewardship.





Anti-corruption management approach

Although we are, on paper, a young company, we have already established a robust governance framework to build compliance and ethical conduct into our company. We are committed to acting professionally in all our business dealings and relationships wherever we operate. Compliance with applicable laws in all the regions where Idorsia operates is crucial to our success and our reputation. With this in mind, we have implemented a broad range of **supporting policies**, standard operating procedures and guidelines, which are steered by our Legal and Compliance department. These policies and practices are continually reviewed and adapted as appropriate.

Code of Business Conduct

Idorsia's **Code of Business Conduct**, which is provided to all employees, sets out our fundamental standards of behavior and standards for interacting with others as we evolve our business. It is the foundation of our corporate culture and defines the core principles and ethical standards by which we create value in our company. It covers topics such as insider trading, business practices, discrimination, animal welfare and more.

Board members, management and employees of Idorsia and its worldwide affiliates are responsible for always demonstrating honesty, integrity and respect in their work activities, obeying applicable laws and regulations, and adhering to Idorsia policies and procedures. All Idorsia employees have undergone mandatory training to ensure compliance with the Code, which is publicly available on Idorsia's website. Any violation of the Code may lead to disciplinary actions and termination of employment. From 2023, mandatory training will be carried out for all employees every two years.

Anti-Corruption and Anti-Bribery Policy

Our **Anti-Corruption and Anti-Bribery Policy** is testimony to our zero-tolerance approach, and we implement and enforce effective systems to counter bribery. Training on this policy forms part of the induction process for all new employees, while existing employees receive regular training on how to implement and adhere to this policy.

Group Compliance /General Counsel monitors the effectiveness and reviews the implementation of this policy, regularly considering input from all relevant stakeholders. Internal control systems and procedures are subject to regular audits to provide to monitor their effectiveness in countering bribery and corruption. All employees are responsible for upholding compliance with this policy and for ensuring disclosure and identification of any suspected danger or wrongdoing.



Management has overall responsibility for ensuring that the Anti-Corruption and Anti-Bribery Policy reflects our legal and ethical obligations, and that all those under our control comply with it. Group Compliance Office and the Group General Counsel have primary and day-to-day responsibility for implementing and monitoring the policy's use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand the policy and are given adequate and regular training on it.

Idorsia is a member of the European Federation of Pharmaceutical Industries and Associations (EFPIA), which is striving to support the industry as a whole to go beyond regulatory compliance.

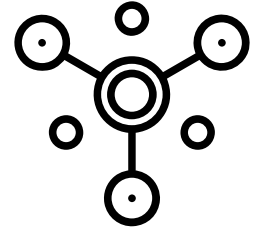
Whistleblowing mechanisms

Idorsia commits to a work environment encouraging honest discussion of issues and concerns about compliance and business conduct. All employees worldwide are expected and encouraged to report potential compliance violations to the Compliance Office supervisors, HR or other relevant departments. Employees or external stakeholders who learn of, or suspect, any policy violation must report the violation to their supervisor or the Compliance Office, or through the **Whistleblower Hotline**, whereby the reporting individual is protected by the **Whistleblower Protection Policy**.

Reports are reviewed by the Compliance Office. The Compliance Office will address all issues and allegations of misconduct and will put forward measures or corrective actions to be taken against compliance violations, up to and including termination of employment.



Human rights



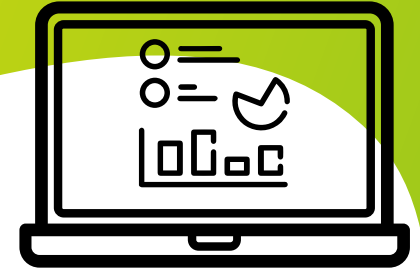
We are committed to respecting human rights in accordance with internationally accepted standards throughout our operations, as human rights are fundamental rights and freedoms to which all people are entitled regardless of race, gender, nationality, ethnicity, language, religion, or any other status.

We adhere to the United Nations Universal Declaration of Human Rights and comply fully with all relevant laws, rules and regulations governing labor and employment in the countries where we operate.

We respect the principles of freedom of association, the right to collective bargaining, equal remuneration, non-discrimination and other rights. We respect the right of all employees to join a legally recognized employee association, and we comply with all laws relating to employee representation. We strive to maintain an open dialogue with all our employees and their representatives.

We seek to prevent human trafficking, forced labor and child labor of any kind. Due to the nature of our business, we have assessed the risk of child or forced labor in our operations as minimal. We do, however, remain vigilant for unexpected issues that may arise – not only in our own operations but also in relation to our procurement practices. Idorsia prohibits any form of forced labor, including prison labor, child labor, bonded labor or work that restricts employees' free choice and movement in our own operations and those of our suppliers.

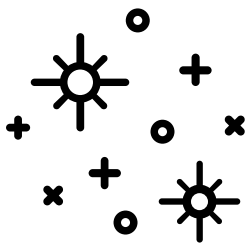
Privacy & data security



Idorsia understands the importance of protecting personal data and applying high ethical and regulatory standards. We are committed to respecting our stakeholders' privacy and safeguarding their personal data. Idorsia's Global Data Protection Policy covers all personal data on study participants, healthcare professionals, customers, suppliers and employees.

We are committed to respecting our stakeholders' privacy and safeguarding their personal information. Idorsia's data protection policy covers all personal data on study participants, healthcare professionals, customers, suppliers and employees.

To ensure the integrity and privacy of personal and health-related information provided to us, we use state-of-the-art information security programs, focusing on protection of sensitive information and detection of unauthorized access.



Risk management



At Idorsia, we seek to reduce risk and ensure business continuity through our Enterprise Risk Management system, which is designed to identify, assess and manage risks.

Significant risks relating to corruption at our Headquarters in Switzerland and affiliates across the world are monitored through this system. Currently, insider trading has been identified as a minor risk and is monitored by the Legal and Compliance functions.

For further information, see the **Risk Management info sheet**. Furthermore, many of our business partners receive communication and training about Idorsia's anti-corruption policies.



Responsible marketing management approach

Our Corporate Compliance Office is responsible for the internal compliance policies that ensure regulations applying to our sales and marketing activities are adhered to. The Compliance Office is supported by other functions which provide expertise and offer guidance on specific topics.

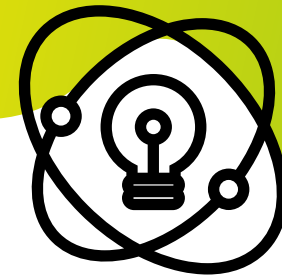
Interactions with healthcare professionals (HCPs)

We may engage Healthcare Professionals (HCPs) and Healthcare Organizations to provide knowledge and expertise required to support research, medical or commercial objectives. In order to ensure compliance with anti-bribery legislation and industry codes, contractual arrangements must not be entered into for the purpose of influencing the use, purchase or recommendation of Idorsia products. All HCP arrangements must thus meet the standards set out in our **Global Principles For Healthcare Professionals Interactions**. In circumstances where local laws and regulations impose more stringent requirements, the relevant Idorsia affiliate must adopt local policies and procedures to ensure compliance with these local regulations. A Global HCP Travel and Hospitality Guidance Policy is also available for persons interacting with HCPs.

Affiliate General Managers are responsible for ensuring compliance with the Global Principles for HCP Interactions at the local level, including the delegation of authority and resources to relevant function heads, who will be responsible for the implementation and oversight of appropriate processes within their respective areas of control. This includes the timely review and approval of all promotional and medical content and materials, appropriateness of HCP and patient interactions, appropriateness of contracting and funding provided at local level, and training on required policies and procedures, including the Global Principles for HCP Interactions and the Code of Business Conduct. At Idorsia Headquarter and at our US affiliate, a Healthcare Compliance Committee has been established to ensure appropriate oversight of our medical and commercial activities in that market.



Product stewardship



To ensure patient safety, we strive to meet or exceed applicable regulatory requirements for current Good Manufacturing, Clinical and Laboratory Practices (GxPs).

We operate in a strictly regulated industry, and extremely stringent safety standards apply to all pharmaceuticals, from development to manufacture, distribution and marketing. All products must undergo careful examination by health authorities to ensure patient and product safety. This includes a benefit-risk assessment, which, if positive, means that a product will reach the final stages of approval. All results from the benefit-risk assessment deemed relevant by the health authorities must be reflected in the product labeling.

The benefit-risk ratio of a product is reviewed continuously, even after market introduction. Any new significant risks that

emerge must be reflected in the labeling and marketing, and it is our responsibility to monitor and collect data for products and inform the relevant authorities in the event of any changes.

We also provide information on safe use and disposal of products under normal usage as per legal requirements. Further information on the safe handling and use of products is easily accessible through Idorsia's website and in the patient information leaflets provided with products, enabling patients and physicians to make informed decisions.

Furthermore, all drugs marketed in the EU and US are required to undergo environmental risk assessments, to assess the potential environmental risks of human medicinal products. The environmental risk assessment (ERA) of medicinal products is to be performed by companies during the development of new medicines. The

outcome of an ERA allows companies and authorities to minimize the amount of product released into the environment, identify specific risk reduction activities to be undertaken by the user of the medicine, and define appropriate labeling to facilitate correct disposal by patients/healthcare professionals (e.g. ensuring that the product is disposed of in special containers or returned to a pharmacy).

Further information can be found on the websites of the **European Medicines Agency** and the **FDA**.

We apply the precautionary principle to all aspects of our work, especially with the use of chemicals and therapies.

For further information on how we ensure product safety and quality in the supply chain, see our **Product Safety & Quality info sheet**.



Research ethics



We strive to maintain the highest ethical, scientific and clinical standards in all our research activities, and to comply with all national and international standards. Idorsia regularly reviews its research policies to align them with its strategic objectives and with the evolving values and goals of stakeholders.



Regulatory authorities around the world require pharmaceutical companies to test all new drugs before they are launched, and there is no alternative to including some animal testing as part of this process. This is essential both for scientific reasons and to safeguard the volunteers and patients who take part in subsequent clinical trials. As a fundamental principle, we support the “three Rs” in relation to animal testing:

Refinement – Alleviate or minimize impacts to animals by reducing potentially painful or invasive procedures, whenever possible.

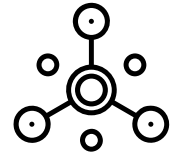
Reduction – Use the absolute minimum number of animals required to obtain valid results in each study.

Replacement – Always look for alternative, non-animal-based research methods where possible.

The number of animals used in drug development has dropped dramatically over the past three decades as a result of industry initiatives of this kind. Idorsia has a strong policy on the care, welfare and treatment of animals, and we conduct regular audits to make sure that our expectations are being met, whether the studies are conducted in-house or outsourced.

In addition, we ensure that the use and care of all laboratory animals meets or exceeds relevant local, national and international regulations. Our programs and facilities are subject to unannounced regulatory review and inspections. For sponsored work at contract research organizations, our animal welfare oversight activities include regular on site evaluations by our veterinary staff. Idorsia will never use great apes (gorillas, chimpanzees, orangutans and bonobos) in its research.

About this report



Company profile

Headquartered in Allschwil, Switzerland – a European biotech hub – Idorsia is a high-potential biopharmaceutical company, specialized in the discovery, development and commercialization of innovative small molecules, with the aim of transforming the horizon of therapeutic options. The company has an experienced team of over 1,300 highly qualified professionals covering all disciplines from bench to bedside, and commercial operations in Europe, Japan, and the US – the ideal constellation for bringing innovative medicines to patients.

We are committed to achieving our ambitious goals in an economically, socially and environmentally responsible manner, and, as the company grows, our commitment to sustainability remains as important as ever.

We have a diversified and balanced clinical development pipeline covering multiple therapeutic areas, including CNS, cardiovascular and immunological disorders, as well as orphan diseases. Two Idorsia products are commercially available – QUVIVIQ™ (daridorexant) in the US and Europe, and PIVLAZ® (clazosentan) in Japan.

Idorsia Ltd is the Group's holding and finance company, with 14 subsidiaries across Europe, Asia and the US. Idorsia was listed on the SIX Swiss Exchange (ticker symbol: IDIA) in June 2017.

About our sustainability reporting

The information contained in this info sheet covers the period from January 1, 2020 to December 31, 2022 and pertains to all significant locations of operation. In the context of its sustainability reporting, Idorsia considers significant locations of operation to be those with more than 20 permanent employees. Currently, this includes locations in Switzerland, the US and Japan. Any deviations from this reporting framework are indicated on a case-by-case basis.

The content of our sustainability reporting is aligned with the results of a materiality assessment and references the internationally recognized guidelines of the **Global Reporting Initiative (GRI)**.

For the full set of ESG info sheets, visit **www.idorsia.com/sustainability**