

CODE OF BUSINESS CONDUCT

A MESSAGE FROM THE CEO



Dear Colleagues,

At Biogen, our mission is to pioneer innovative science, deliver new medicines, transform patients' lives and create value for shareholders and our communities. We apply deep understanding of human biology and leverage different modalities to advance first-in-class treatments or therapies that deliver superior outcomes. To fulfill this mission, we must hold ourselves to the highest standards of business and professional conduct.

Doing things ethically and compliantly is embedded in Biogen's culture. The Biogen Way Essentials highlight Ethical as a foundational guiding principle. This is our unwavering commitment to acting with the highest integrity with each other and all who place their trust in us. The Biogen Code of Business Conduct describes how we operate and guides the decisions we make in support of our mission. It serves as a foundation for our Company's written standards, each providing additional guidance and direction on specific areas of conduct.

Each of us plays an important role in upholding our Code. This includes speaking up when there are concerns about potential or actual Code or policy violations. A critical part of Biogen's speak up culture is our commitment to protecting our people against retaliation: any retaliation claims will be taken seriously and thoroughly investigated.

I encourage you to take the time to read our Code and use it as a guide for your daily behavior. Remember, the Code is a living document that we can come back to whenever we're looking for the right path forward.

Christopher A. Viehbacher
President and Chief Executive Officer



TABLE OF CONTENTS

A MESSAGE FROM THE CEO	2	WE RESPECT HEALTHCARE PROFESSIONALS		WE ARE TRANSPARENT AND ETHICAL	
THE BIOGEN WAY	4	We care for our customers	20	We cooperate with regulators	42
Our Mission	4	We have proper interactions with		We avoid bribery and corruption	43
Our Culture	4	healthcare professionals	21	We engage in fair business practices	44
Our Credo	4	We are honest in our marketing practices	22	We conduct international trade legally	45
				We engage in the political process responsibly	47
WE FOLLOW OUR CODE		WE WORK TOGETHER AS A TEAM		WE PROTECT INFORMATION AND ASSETS	
Purpose of the Code	6	Respect builds successful teams	24	We treat sensitive information with care	49
Who's covered by our Code?	6	We protect human rights	25	We comply with all insider trading laws	50
What happens if we don't comply?	6	We embrace diversity and inclusion	26	We use Company assets ethically	51
Navigating the Code	7	We maintain a harassment-free workplace	27	We safeguard intellectual property	52
		We support work-life balance	28	We communicate with the public only	
OUR RESPONSIBILITIES		WE ARE RESPONSIBLE TO OUR COMMUNITIES		when authorized	53
We are all responsible	9	We are good corporate citizens	30	WE NEVER COMPROMISE OUR INTEGRITY	
Special responsibilities of managers	9	We promote sustainability	31	We address conflicts of interest	55
We make ethical decisions	10	We protect private and confidential information	32	We comply with gifts and hospitality rules	56
We speak up	11	We provide a secure workplace	34	We comply with laws, regulations, and standards	57
		We provide a safe and healthy workplace	35	We comply with our written standards	58
WE RESPECT PATIENTS		WE ARE FAIR AND HONEST			
We put patients first	13	We communicate transparently	37		
We have proper interactions with patients		We maintain strong business partnerships	37		
and patient advocacy organizations	14	We properly handle business intelligence			
We protect patient privacy	15	and confidential information	38		
We deliver safe and high-quality products	16	Complete, accurate and timely disclosures			
We are committed to bioethics and		and business records	39		
sound clinical research	18	We create and manage records responsibly	40		

THE BIOGEN WAY

The Biogen Way describes the mission and behaviors that provide the foundation for Biogen's next era. It is rooted in the Company's birth in 1978, when a group of accomplished scientists and a few venture capitalists formed a new company with an emphasis on breakthroughs in biology.



Our Mission

Biogen is a leading biotechnology company that pioneers innovative science to deliver new medicines, transform patients' lives and create value for shareholders and our communities. We apply deep understanding of human biology and leverage different modalities to advance first-in-class treatments or therapies that deliver superior outcomes. Our approach is to take bold risks, balanced with return on investment to deliver long-term growth.

Our Culture

Five culture essentials are the guiding principles that provide direction to *how* we will successfully achieve our mission. The first three focus on areas where we need to evolve how we work to achieve our ambitious mission and do some things differently.

- **Pioneer** - We boldly advance rigorous science to drive innovation in medicine.
- **Think Broadly** - We are humble and curious, integrating external and internal advances to successfully compete.
- **Drive Results** - We achieve high performance and have greater impact by being decisive and solution-oriented, while effectively managing risk.

The last two essentials are foundational to who we are and build upon our strengths.

- **Ethical** - We act with the highest integrity with each other and all who place their trust in us.
- **Inclusive** - We are open, embrace and leverage differences and treat everyone with care and dignity.

Our Credo



Caring Deeply.



Achieving Excellence.



Changing Lives.

THAT'S THE BIOGEN WAY.

WE FOLLOW OUR CODE





PURPOSE OF THE CODE

At Biogen, we hold ourselves to the highest standard of business and professional conduct. As a result, all our stakeholders continue to trust our products and services. Our Code of Business Conduct describes how we put our cultural essentials into action with a focus on ethics. It explains our commitment to improve patients' lives and make a difference in the world. Our Code also provides guidance to our employees and everyone who works on Biogen's behalf.

WHO'S COVERED BY OUR CODE?

Our Code applies to all employees, officers and board directors. Business partners are expected to live up to the principles of the Code.

BUSINESS PARTNERS INCLUDE:

- joint ventures
- agents, consultants and distributors
- suppliers and vendors
- independent contractors
- temporary employees

WHAT HAPPENS IF WE DON'T COMPLY?

Violating relevant laws, regulations or the Code, or encouraging others to do so, exposes the Company to liability and puts both your own and the Company's reputation at risk. The Company will take appropriate disciplinary action against any employee or business partner whose actions are found to violate these policies or any other policies of Biogen. Where laws have been violated, Biogen will cooperate fully with the appropriate authorities.

NAVIGATING THE CODE

Our Code of Business Conduct guides us in making the right ethical decisions for Biogen. While our Code cannot address every situation we may face, it is a tool to help us apply our Ethical Principles at work.

Our Code is divided into sections that highlight our eight Ethical Principles:

WE RESPECT PATIENTS

WE RESPECT HEALTHCARE PROFESSIONAL

WE WORK TOGETHER AS A TEAM

WE ARE RESPONSIBLE TO OUR COMMUNITIES

WE ARE FAIR AND HONEST

WE ARE TRANSPARENT AND ETHICAL

WE PROTECT INFORMATION AND ASSETS

WE NEVER COMPROMISE OUR INTEGRITY

In many sections there are examples that help apply the guidance in the Code to specific situations we may face, including:



MAKE SURE YOU — Things to make sure you do



WATCH OUT FOR — Things to be aware of



ENHANCE YOUR UNDERSTANDING — Examples and definitions


Q&A OUR CODE IN ACTION — Real-life scenarios

LEARN MORE

» Biogen's Global Policies & Guidance

INTERACTIVE PDF FEATURES

CHAPTER NAVIGATION

You can navigate from chapter to chapter by clicking on the color bars at the top of each page. The selected chapter will be change to its individual color when you hover over it with your cursor. 

PAGE NAVIGATION



You can navigate from page to page by clicking  or  at the bottom left of the page.

TABLE OF CONTENTS

You can return to the Table of content at any time by clicking  at the bottom left of the page.

OUR RESPONSIBILITIES



WE ARE ALL RESPONSIBLE

Individually, and as members of the Biogen team, we are all responsible for applying our Ethical Principles every day. Any success that we achieve, if not achieved ethically, is no success at all. To meet our responsibilities, we all must:

- Always act in a professional, honest and ethical manner when acting on behalf of the Company.
- Be familiar with and comply with our Code, our policies and applicable laws and regulations.
- Complete all required training on time.
- Promptly **report** possible violations of our Code, our policies and applicable laws and regulations to your supervisor or to any of the resources listed in this Code.

Remember: No reason, including the desire to meet business goals, is an excuse for violating laws, regulations, the Code or policies.

SPECIAL RESPONSIBILITIES OF MANAGERS

If you are in a leadership position, you are expected to fulfill the following additional responsibilities:

- Lead by example: managers are expected to exemplify the highest standards of ethical business conduct
- Be a proactive resource for others.
- Communicate with employees and business partners about how the Code and policies apply to their daily work.
- Look for opportunities to discuss and address ethics and ethically challenging situations with others.
- Create an environment where compliance is recognized and valued and where everyone feels comfortable asking questions.
- If you supervise external business partners, ensure that they understand their ethics and compliance obligations.



WE MAKE ETHICAL DECISIONS

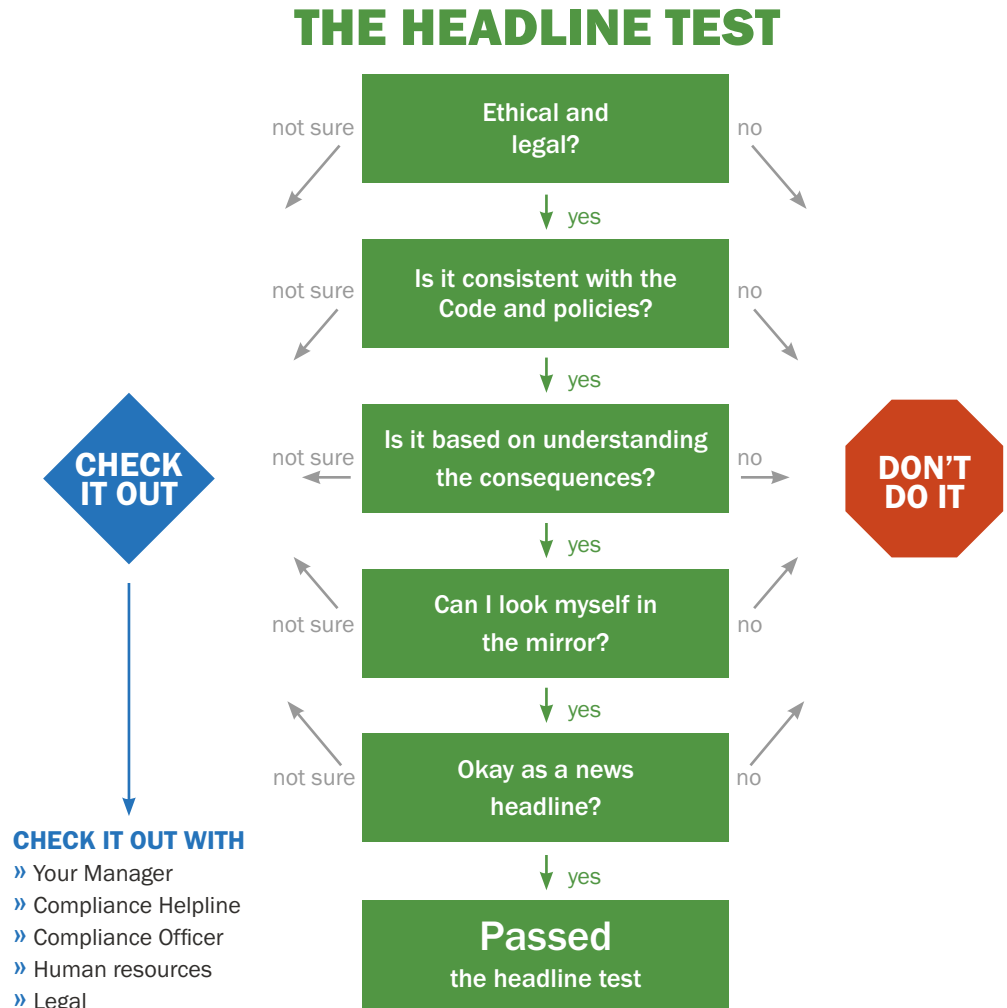
Making the right decision is not always easy. There will be times when you will be under pressure or unsure of what to do. Always remember when you have a tough choice to make, you are not alone. Your colleagues and management are available to help, and you have other resources to turn to including our Code, our policies, your supervisor and the resources cited throughout the Code.

When faced with a tough decision, it may help to ask these questions:

- Is my action ethical and legal?
- Is it consistent with the Code and policies?
- Is it based on a thorough understanding of the possible consequences?
- Will I be able to look myself in the mirror and be proud of the decision (the mirror test)?
- Would I still be comfortable with the decision if it appeared in the newspaper (the headline test)?

You might also use the following headline test diagram to think through the soundness and impact of your business decisions and actions on behalf of the Company.

Before acting on the behalf of the Company, ask yourself: How would it look if my action were to be a headline on the front page of the newspaper, captured on the internet or on a leading pharma blog.



WE SPEAK UP



Where to go for help

If you see or suspect any illegal or unethical behavior, or you have a question about what to do in a certain situation, you have a responsibility to speak up. Remember, an issue cannot be addressed unless it is brought to someone's attention. You can ask questions and report possible ethical or legal violations by using the Helpline described below. Importantly, you are encouraged to speak with the person with whom you feel most comfortable, including:

- Your supervisor or manager
- Another supervisor or any member of management
- Compliance Officer
- Human Resources
- Legal
- Finance



Helpline

If reporting your concern to your supervisor or another person is uncomfortable, please do not hesitate to call the **Helpline** or submit a report **online**.

- Your call will not be recorded.
- Language translations are available.
- Your report or question will be handled by an independent third party that we have contracted for this purpose.

- When you call, the interviewer will work with you to document the situation in detail.
- The interviewer will provide you with information on how you can access status updates or answers to additional questions.
- All calls and reports submitted are handled promptly and discreetly.
- The information will then be relayed by the third party to the Company.
- The Company will then evaluate the issue and determine appropriate next steps, including investigation.



Anonymity and confidentiality

You may report anonymously, if permitted by local law. If you call or submit online from a country where anonymous reports are permitted, you will be given a reference code. You can use this code to follow up on the progress of the investigation without compromising your anonymity. If you do not report anonymously, confidentiality will be maintained to the fullest extent feasible. In any event, seek guidance if you are unsure what to do. Don't hesitate to ask questions and get the advice you need.

IMPORTANT NOTICE TO EMPLOYEES: Consistent with the US Defend Trade Secrets Act, employees shall not be held criminally or civilly liable under any federal or state trade secrets law for the disclosure of a trade secret that:

- Is made in confidence to a federal, state or local government official, either directly or indirectly.
- Is made to the employee's attorney in relation to a lawsuit for retaliation against an employee for reporting a suspected violation of law.
- Is made in a compliant or other document filed in a lawsuit or other proceeding, if such filing is made under seal.



We will not tolerate retaliation

Regardless of the type of misconduct reported, we will not tolerate retaliation against anyone who cooperates in an investigation or who makes a good faith report of an alleged violation of laws, regulations, the Code or policies. We take claims of retaliation seriously. All such claims will be thoroughly investigated and resolved. If you believe you have been retaliated against because you reported misconduct or cooperated in an investigation, you should notify the Compliance department or the Helpline. Anyone found to have retaliated will be disciplined, up to and including termination of employment.

LEARN MORE

» Biogen Global Investigations Protocol

WE RESPECT PATIENTS

Biogen is a global biopharmaceutical company focused on discovering, developing, manufacturing and delivering therapies to patients for the treatment of neurological diseases, autoimmune disorders and rare diseases.



WE PUT PATIENTS FIRST

We treat patients with respect. We work to understand and meet their needs. We tell the truth about our products and capabilities, and we do not make promises we can't keep. In short, we strive to treat patients as they want to be treated.



✓ MAKE SURE YOU

- Only interact with patients in circumstances permitted by Company policy and local rules and regulations
- Interact with each patient fairly and honestly
- Are responsive to patient and customer requests and questions
- Promise only what you can deliver and deliver on what you promise
- Respect the physician-patient relationship

👁 WATCH OUT FOR

- Exposure to patients' personal and sensitive information
- Pressures from colleagues or supervisors to cut corners on safety, quality or standards
- Temptations to tell others what you think they want to hear rather than the truth
- Giving medical advice inadvertently or overtly

REMOVING BARRIERS TO CARE

Our Patient Services teams help improve patients' lives every day. They focus on supporting patients through product education programs, providing assistance that facilitates access to our treatments and ensuring safety and compliance with relevant regulatory standards.

WE HAVE PROPER INTERACTIONS WITH PATIENTS AND PATIENT ADVOCACY ORGANIZATIONS

Biogen recognizes the importance of fully understanding the needs of the patient communities we serve. We strive to build relationships with patient advocacy groups based on mutual respect and transparency.



✓ MAKE SURE YOU

- Ensure our communications are educational, accurate and consistent with applicable Company policies, laws and regulations
- Respect the independence of patient organizations
- Maintain documentation detailing the nature and purpose of any support provided by Biogen
- Do not require that we be the sole funder of the patient organization or any of its programs

👁 WATCH OUT FOR

- Requests to be the sole funder of the organization
- Unclear expectations and ambiguity around the nature or purpose of the involvement
- Any request to obscure details of the relationship

LEARN MORE

- » Global Interaction with Patient Advocacy Groups SOP
- » Global Grants, Donations and Sponsorships Policy
- » Patient Resources are available in the Focus on Neuroscience section on Biogen's external website: www.biogen.com

WE PROTECT PATIENT PRIVACY

We secure all patient personal data, keep it confidential and use it only for the purpose for which it was collected. Our patients trust us with their private, personal and confidential information. We earn that trust by following Company policies and procedures and complying with applicable laws and regulations. The privacy and security of patient personal data is a top priority for Biogen. Patient personal data, which may include Protected Health Information (PHI) and sensitive data is subject to various regulatory protections, such as a requirement to have policy and security safeguards in place to protect it.



✓ MAKE SURE YOU

- Handle patient personal data responsibly
- Understand what personally identifiable information (PII) and patient healthcare information (PHI) are and how to protect them
- Understand the data privacy laws that apply in the country where you work
- Ask the **Global Privacy Office** if you have questions about what personal data is and how to be compliant



ENHANCE YOUR UNDERSTANDING

Personally identifiable information (PII) is any information that can be used to identify an individual, such as:

- Full name
- Government identification number
- Date and place of birth
- Email address and phone number
- Home address
- Credit card information

Patient healthcare information (PHI) is any information about a person's health, medical treatment or payment for healthcare services, such as:

- Medical records
- Lab test results
- Medical bills
- Prescription information
- Health insurance information

LEARN MORE

- » [Global Data Privacy Policy](#)
- » [Global Data Protection Policy](#)
- » [R&D Privacy Policy](#)

WE DELIVER SAFE AND HIGH-QUALITY PRODUCTS

Biogen trusts and empowers its employees to uphold product quality and safety as an integral part of their responsibilities. Safety and quality are part of our culture and are integrated into all critical business and decision-making processes. All individuals involved in the development, manufacture, and distribution of our medicines are accountable for the safety and quality of our products. We comply with all regulations and laws relating to product complaint (PC) and adverse event (AE) reporting.



MAKE SURE YOU

- Read and understand the Global Adverse Event Reporting SOP for Biogen Originator Products
- Follow the Global Product Complaint Reporting Policy for reporting Product Complaints (PCs) and Customer Input
- Are always open to suggestions from customers and others about possible product improvements
- Speak up if you have concerns about product quality or customer service
- Report PCs, Customer Input or AEs you become aware of within one (1) business day of receipt even if you are not sure there is a cause-and-effect relationship between the product and the “event”
- Comply with all applicable procedures designed to promote product safety, efficacy and quality



ENHANCE YOUR UNDERSTANDING

A **product complaint (PC)** is any communication suggesting a deficiency related to labeling, identity, strength, purity, stability, durability, reliability, effectiveness, performance, usability, safety or quality of a Biogen clinical or commercially licensed product, or a possible failure of the product to meet any of its specifications.

Examples include:

- “The activation button was difficult to depress”
- “There is foreign material inside the product liquid”
- “The bottom of the vial was cracked”
- “This seems like a counterfeit or falsified product”

ENHANCE YOUR UNDERSTANDING

An **adverse event (AE)** is any untoward (unfavorable) or adverse medical occurrence in a patient or clinical investigation subject who is administered a medicinal product regardless of whether there is a causal relationship with the treatment or product.

Examples include:

- “Patient had a headache”
- “Patient experienced an infusion reaction”
- “Patient was involved in a car accident”

In addition to AEs, safety information required to be collected and reported to Global Safety or the local Biogen safety office includes:

- AEs associated with Product Complaints (PCs) such as “the taste of a tablet caused a patient to feel nauseous.”
- Exposure during pregnancy or breastfeeding, including paternal exposure resulting in pregnancy.
- Overdose, misuse, abuse, medication error, off-label use (use of medicines outside the terms of the license).
- Lack of efficacy.
- Occupational exposure.
- Suspected transmission of an infectious agent (contamination).
- AEs associated with falsified medicinal/counterfeit product.
- Unexpected therapeutic benefits after receiving a Biogen product.
- Use of a medicinal product in a pediatric or elderly population.
- Progression/worsening of underlying disease or preexisting condition.
- All Company-sponsored websites, apps and social media pages that have the ability to receive user-generated content (UGC), must be monitored for product complaints and adverse events. A record of the monitoring results must be kept, and any PCs or AEs identified reported within (1) business day.
- Employees who engage vendors that are reasonably expected to receive or handle PCs and AEs (this includes but is not limited to vendors contracted for Organized Data Collection Programs such as Patient Support Programs, Market Research and Social Media activities) must notify Global Safety or the local Biogen office of the program prior to start, according to local training instructions. These vendors must have language in their contract describing their PC and AE reporting requirements, and must be trained on PC and AE reporting requirements prior to interaction with patients, caregivers or health care professionals on behalf of Biogen.



LEARN MORE

- » Global Product Complaint Reporting Policy
- » Global Quality Policy
- » Global Adverse Event Reporting SOP
- » R&D Benefit Risk Policy
- » Discuss any questions or concerns about our products with your manager, Technical Product Complaints, Global Safety, Compliance Officer, Legal or Human Resources partners.

WE ARE COMMITTED TO BIOETHICS AND SOUND CLINICAL RESEARCH

We are proud of our work to advance human health care through research and development. We promote transparency and accuracy in an environment that engages with key stakeholders. Our commitment to bioethics and ethical clinical research helps us build trust with our patients, the community and physicians: trust that we abide by all laws and regulations and include the best ethical practices from the scientific and medical communities to act appropriately on high-potential research that maximizes patient benefit. Our research and clinical studies are dependent on animals and human subjects. We protect patient rights through appropriate informed consent procedures and good clinical practices, and we document our compliance with all applicable privacy-related policies and regulations.

We protect the welfare of animals used in research to ensure they are treated humanely with minimal pain and suffering. We are committed to the safe and ethical use of biotechnology to improve the quality of human life, and we recognize that we must approach technology with a balance of vigilance, diligence and humility.

Our approach to bioethics is guided by the Biotechnology Industry Organization's (BIO) principles, including a respect for the potential significant benefits of biotechnology and a commitment to use it only for the benefit of humankind. The following principles must guide us anywhere we do clinical research:

- Participants must not be exposed to unnecessary risks
- Participants must understand the nature and purpose of the research via informed consent procedures
- Privacy and confidentiality rules must be applied
- Information gathered must enable transparent and accurate reporting, interpretation and verification of study outcomes



MAKE SURE YOU

- Observe good privacy practices
- Conduct clinical research in a manner that is respectful and protects the safety and autonomy of research participants
- Report scientific conclusions honestly and in a timely fashion
- Undertake additional due diligence when using data for secondary research to ensure alignment with required ethical and regulatory guidelines



WATCH OUT FOR

- Pressure from colleagues to report research results that have not been properly vetted
- Collecting data or test results (from subjects) that we are not required to
- Use of clinical data beyond the authorized research scope

LEARN MORE

- » R&D Subject Welfare Policy
- » R&D Ethical Conduct Policy
- » R&D Intention Policy
- » R&D Privacy Policy
- » R&D Compliance Policy
- » R&D Data Integrity Policy
- » R&D Documentation Policy
- » R&D Quality Management System Policy
- » R&D Benefit Risk Policy
- » Discuss any questions or concerns about our clinical research with Regulatory Affairs, R&D Quality, Operations & Performance, your manager, Compliance Officer, Global Privacy Office, Legal, Human Resources partners or the [Helpline](#).

WE RESPECT HEALTHCARE PROFESSIONALS

Our customers have placed their trust in us.
We work hard every day to earn that trust.
As we serve patients, caregivers and
healthcare providers, we are committed to
excellence in advancing human healthcare.



WE CARE FOR OUR CUSTOMERS

We treat healthcare professionals fairly and with care. We work to understand and meet their needs. We tell the truth about our products and capabilities. We do not make promises we can't keep. In short, we treat healthcare professionals as we would like to be treated.



MAKE SURE YOU

- Treat healthcare professionals fairly and honestly
- Respond clearly to healthcare professional requests and questions
- Refer the healthcare professional to the right person when you don't have the answer
- Promise only what you can deliver and deliver on what you promise
- Respect the physician-patient relationship
- Provide privacy notices and gather consent where necessary



WATCH OUT FOR

- Pressures from colleagues or supervisors to cut corners
- Telling others what you think they want to hear rather than the truth
- Sending customers from one person to another without getting a real answer
- Giving medical advice inadvertently or overtly

LEARN MORE

- » Global Anti-bribery and Anti-corruption Policy
- » Global External Stakeholder Engagements SOP
- » Patient Resources in the Focus on Neuroscience section on Biogen's external website: www.biogen.com

When Biogen interacts with healthcare professionals, we do so with honesty, fairness and integrity.

WE HAVE PROPER INTERACTIONS WITH HEALTHCARE PROFESSIONALS

Healthcare professionals must determine the best course of care for their patients. Biogen is committed to providing timely information to assist them in treatment decisions. This includes fair, accurate and balanced product information, scientific and medical information and safety information. Healthcare professionals practice medicine: Biogen employees do not.



Due to the key role healthcare professionals play in determining which products to recommend, we take special care to avoid even the appearance of unduly influencing their decisions. We promote our products only for the uses that have been approved, cleared or authorized by the relevant governmental agency.

✓ MAKE SURE YOU

- Only engage in interactions with healthcare professionals that advance patient care and support the ethical and compassionate practice of medicine.
- Ensure that all paid service engagements with healthcare professionals are paid at fair market value.
- Examine all relationships and arrangements with referral sources, physicians, vendors and suppliers to be certain there are no kickbacks for the referral of patients or for prescriptions written.
- Never try to interfere with, or unduly influence, a healthcare professional's decision about patient care.
- Immediately refer any questions to Compliance, Legal or the [Helpline](#).
- Handle healthcare professional data responsibly and avoid exposure to patient personal data in healthcare professional environments.

👁 WATCH OUT FOR

- Additional requirements when interacting with healthcare professionals who are employed by or affiliated with government or regulatory bodies

LEARN MORE

- » Global Anti-bribery and Anti-corruption Policy
- » Global External Stakeholder Engagement SOP
- » Global Travel and Expense Policy
- » Global Material Review Policy
- » Global Conflicts of Interest and Outside Activities Policy

WE ARE HONEST IN OUR MARKETING PRACTICES

We communicate about our products accurately, honestly, ethically and in compliance with all applicable laws. We do this to ensure the safe and proper use of our products and to build trust with patients and healthcare professionals.



✓ MAKE SURE YOU

- Follow all laws and policies related to product labeling, advertising and marketing
- Provide only approved marketing and sales materials on the products and services we offer
- Only make truthful claims about our products and services
- Do not engage in making inflated claims, disparagement of competitors or other deceptive marketing communications

👁 WATCH OUT FOR

- False or misleading information, or misrepresentations of our products or those of the competition
- Overstatement of the efficacy of our products
- Statements that downplay or minimize the risks associated with our products
- Messages or marketing materials that have not been properly reviewed and approved
- The promotion of products for uses other than their approved use



ENHANCE YOUR UNDERSTANDING

Marketing and sales materials may include:

- Packaging labels
- Inserts
- Local prescribing information
- Sales aids
- Leave-behinds

LEARN MORE

- » Global Anti-bribery and Anti-corruption Policy
- » Global Materials Review Policy
- » Global Competition Law Policy

WE WORK TOGETHER AS A TEAM

We are committed to a workplace where employees feel they are treated with respect and dignity.





RESPECT BUILDS SUCCESSFUL TEAMS

We owe each other honesty, respect, and fair treatment – this means we treat others as they want to be treated and in the spirit of our Essentials. It's also the basis of our commitment to one another and the key to building successful teams.

Keeping this commitment allows us to attract and retain talented individuals in a supportive, professional and respectful work environment.

One of Biogen's core values is to respect all employees as equals and to listen to individual opinions, without discrimination or harassment based on an individual's sex, gender identity or expression, sexual orientation, marital status, race, color, national origin, ancestry, ethnicity, religion, age, veteran status, disability, the status of being transgender, genetic information or any other basis protected by law.

We believe this environment helps Biogen succeed and creates the setting for each of us to thrive and to reach our full potential. What follows are some of the key areas where we shall be guided by our commitment to our Ethical Principles.

WE PROTECT HUMAN RIGHTS

Biogen strives to uphold human rights in all our business activities. We support and champion fundamental human rights.

As a responsible organization, we respect the human rights of all people with whom we interact, including our patients, customers, employees, and business partners.



We will not knowingly work with business partners who employ children or engage in forced labor. We respect employees' lawful right to exercise free association. We recognize the right of our employees to choose or not choose collective bargaining representation.

MAKE SURE YOU

- Demonstrate our cultural essentials
- Live our Code of Business Conduct

- Do not work with business partners who employ children or forced labor
- Make sure our suppliers and partners know our human rights standards and live up to them

WATCH OUT FOR

- Business partners who fail to respect others
- Violations of human rights or employment laws
- Conflicts or lax standards



ENHANCE YOUR UNDERSTANDING

Our Human Rights position conforms to the United Nations' Universal Declaration of Human Rights and its Articles and principles. In every country where we operate, we follow all human rights laws, regulations and international conventions.

These include:

- International Labour Office Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises

LEARN MORE

- » Global PTP Vendor Onboarding and Management SOP
- » Global Non-Employee Policy
- » Discuss any questions or concerns about our commitment to human rights with your **Compliance Officer, Legal, Human Resources** partners or the **Helpline**.

WE EMBRACE DIVERSITY AND INCLUSION

Biogen brings together employees with a wide variety of backgrounds, skills, abilities and cultures. Combining this wealth of talent and resources creates our diverse and dynamic teams that drive excellence. We treat all our colleagues, job applicants and business partners with respect. We evaluate our people solely on their qualifications, skills, achievements and performance.

We strive to establish diversity, equity and inclusion as an embedded aspect of our culture, and a natural part of who we are and how we do business. Our commitment to diversity, equity and inclusion means we do not permit unlawful discrimination on the basis of protected characteristics.

✓ MAKE SURE YOU

- Treat others respectfully and professionally
- Promote diversity, equity and inclusion in all employment decisions including hiring, placement and promotions
- Avoid unlawful discrimination
- Review your own decisions to ensure that objective, merit and business considerations drive your actions

👁 WATCH OUT FOR

- Comments, jokes or materials, including emails, which others might consider offensive
- Behaviors that can be perceived as non-inclusive
- Decisions that are not based on objective business standards and criteria



OUR CODE IN ACTION

Q&A

Question: One of my coworkers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

Answer: You should **notify** your immediate supervisor or any of the resources listed in this Code. Sending such jokes violates our policies regarding our use of email and our standards promoting inclusion and preventing harassment and discrimination. By doing nothing, you are condoning such behavior.



ENHANCE YOUR UNDERSTANDING

Protected characteristics include:

- Race, ethnicity or color
- Sex, gender identity or expression, status of being transgender or sexual orientation
- Marital status
- National origin or ancestry
- Religion
- Age, disability or veteran status
- Genetic information
- Any other basis protected by law

WE MAINTAIN A HARASSMENT-FREE WORKPLACE

We all have the right to work in an environment that is free from intimidation and harassment. Biogen expects all personnel to adhere to a simple standard: all employees will be treated with respect. Verbal or physical conduct by any employee that harasses another, disrupts another's work performance or creates an intimidating or hostile work environment will not be tolerated.

MAKE SURE YOU

- Speak up when a coworker's conduct makes you or others uncomfortable
- Never tolerate harassment of any kind
- Do not visit inappropriate internet sites or display sexually explicit or offensive pictures in the workplace
- Report behavior that may violate our Ethical Principles

While it is not possible to list all circumstances that may constitute harassment, the following are some examples of conduct that, if unwelcome, may constitute harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness.

LEARN MORE

- » Global Non-Discrimination and Non-Harassment Policy
- » Discuss any questions or concerns about harassment with your **Compliance Officer, Legal** or **Human Resources** partners.

OUR CODE IN ACTION

Q&A

Question: While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked her to stop, but she wouldn't. We weren't in the office, and it was "after hours" so I wasn't sure what I should do. Is it harassment?

Answer: This type of conduct is not tolerated, not only during working hours, but in all work-related situations including business trips. You have asked your colleague to stop, which is the first step. Tell your colleague such actions are inappropriate and must be stopped and **report** the problem to your immediate supervisor or any of the resources listed in this Code.

AT BIOGEN WE DO NOT TOLERATE:

- Unwelcome remarks, gestures or physical contact
- Verbal abuse, threats or taunting
- Threatening or inappropriate remarks, obscene phone calls or stalking
- Causing fear of, or actual, physical injury to another
- Intentionally damaging someone else's property
- Threatening, intimidating, coercing or retaliating against those who report their concerns – anywhere, anytime, for any purpose

One potential form of harassment is sexual harassment, often seen in:

- Actions that are unwelcome (e.g., a request for a date or a sexual favor) or used as the basis for employment decisions.
- An intimidating, offensive or hostile work environment created by unwelcome sexual advances, insulting jokes, displays of sexually explicit or offensive pictures or other material, inappropriate touching or other offensive behavior of a sexual nature.

WE SUPPORT WORK-LIFE BALANCE

Life is more complex and busier than ever. At Biogen, we care deeply about the well-being of our employees and respect their need to effectively manage personal and professional responsibilities. To help our employees achieve work-life balance while maximizing productivity, Biogen's Ways of Working Global Guidelines allow for flexible work arrangements designed to offer employees options regarding how, when and where they get their work done.



✓ MAKE SURE YOU

- Respect others' time and make reasonable accommodations for personal and family commitments when possible.
- Work with your manager to get approval for any flexible work arrangements, consistent with our Ways of Working Global Guidelines.
- Conduct yourself in the same professional manner when working at home as you would when working in a Biogen facility.
- Comply with the standards outlined in our Code and Company policies no matter where and when you work.

OUR CODE IN ACTION

Q&A

Question: My supervisor knows I coach my daughter's sports team and I would like to leave early twice a week for games. He always seems to find a project for me to do just as I'm trying to leave. I know I'm expected to get my work done, and I do come in early and often work late, but is there anything more I can do about this?

Answer: We can't always control our work schedules and sometimes projects will come up that require our immediate attention. However, if the conflict persists, discuss the matter with your supervisor or Human Resources. You should be able to find options that allow you to meet your work-life responsibilities.



WE ARE RESPONSIBLE TO OUR COMMUNITIES

We are committed to growth and renewal for ourselves and our Company, and to making our world a better place. Our primary way of contributing to a better world is through our life changing and saving products, but we also give back to our communities.

WE ARE GOOD CORPORATE CITIZENS

At Biogen, we pioneer science to defeat complex and devastating diseases. Our business is a force for good through the patients we serve, the innovations we advance, the jobs we create and the communities we support. True to our purpose, we serve humanity through science while advancing a healthier, more sustainable and equitable world. We are committed to good corporate citizenship that gives back to society by providing educational and scientific grants and charitable donations to a variety of organizations and philanthropic programs.



✓ MAKE SURE YOU

- Think about how your department contributes to our corporate citizenship
- Do not use charitable contributions as a means of improperly influencing or gaining favor with others
- Ensure that relationships with patient groups are transparent and based on a shared objective to improve patient healthcare
- Listen to the viewpoints of our stakeholders and use their feedback to improve our performance

👁 WATCH OUT FOR

- Pressure from others to contribute to or join certain preferred charities, groups or political activities
- Improper use of charitable contributions
- Business practices that pose a threat to the well-being of our communities

LEARN MORE

- » Political Contributions Policy
- » Global Grants, Donations and Sponsorships Policy
- » Further information on our policies, procedures and areas of interest can be found on Biogen's external website: grantsandgiving.biogen.com
- » Visit the [United Nations Universal Declaration of Human Rights](#)
- » Visit the [United Nations Convention: International Covenant on Civil and Political Rights](#)

WE PROMOTE SUSTAINABILITY

We conduct business in a way that protects and improves our environment and the community. We work to reduce the environmental impact of our products, operations and supply chain.

We strive to minimize our use of natural resources, reduce waste and mitigate our impact on climate change. We proactively assess environmental risks and opportunities to continuously improve our performance.

MAKE SURE YOU

- Do your part to reduce the use of energy, including turning off electronic equipment when not in use
- Recycle, reuse and compost whenever possible
- Help identify opportunities to improve our environmental performance

WATCH OUT FOR

- Business practices that pose an environmental hazard or unnecessarily waste natural resources
- Inefficiencies and habits that are wasteful

LEARN MORE

- » EHS Management System Manual
- » Global Environmental, Health & Safety Policy
- » Global Sustainability Policy
- » Global Grants, Donations and Sponsorships Policy
- » Read about 'Environment' at [Climate Change Position Statement](#)
- » Read about 'Community and Foundation' at [Biogen Foundation](#)



WE PROTECT PRIVATE AND CONFIDENTIAL INFORMATION

At Biogen, protecting others' privacy has always been a matter of trust. No one should be surprised by what Biogen knows about them or how that data is used. To maintain the trust of our stakeholders, we comply with all applicable laws and regulations related to the handling of personal, private and confidential information.



Individuals, companies and governments have grown increasingly concerned about protecting the privacy and security of personal data. As a result, laws and regulations protecting personal data and how it may be collected, accessed, shared, processed and otherwise used have become pervasive. Privacy laws of certain countries, such as the EU Member States, require us to have a lawful basis to collect and process personal data such as, among several others, when the individual has freely given us their consent to have their data processed for a specific purpose or when data processing is necessary to comply with legal obligations. We can also collect and process personal data if we have a legitimate interest in doing so and if we respect individual rights. We must be careful to avoid collecting unnecessary data as it can unexpectedly trigger certain regulations.

Some laws specify that people must “opt in” or provide affirmative consent before we can collect, use or disclose certain types of personal data. Different jurisdictions decide whether opt-in or opt-out is required. In the EU and many other regions, consent must be freely given, specific, informed and unambiguous. Consent can't be assumed from inaction and individuals can withdraw consent at any time. Individuals should be informed about the personal data we possess about

them. Many jurisdictions provide individuals with the right to access their data, rectify any errors or request deletion of their data. Personal data that is no longer necessary for the specified purpose for which consent was given when it was collected, should be deleted in accordance with Biogen's Global Records Retention and Disposition Policy.

International transfers of data, and sharing with third parties, may require a special set of rules and protections. Personal data can only be transferred if all the data protection principles concerning its collection, processing and transfer are met. For transfers to countries outside the EU and the EEA, certain very specific arrangements must be in place ensuring data protection. If personal data is being supplied by or transferred by another organization, be sure that any transfers are permissible under our contract with that organization, and whenever you do transfer data, be sure that it isn't going to places where it will lose protection or be at risk.

Remember, even when data processing services are outsourced to others, we still maintain responsibility over that data. Many of us have access to personal data related to patients, healthcare professionals, employees and others.

✓ MAKE SURE YOU

- Learn about the types of data that are given heightened protection, which include any data that can directly or indirectly identify an individual, as well as certain sensitive personal data.
- Do not collect, access or process more data than is necessary for you to perform your job.
- Only use personal data for the purposes mentioned when we collect it.
- Provide notice to people about the types of personal data that we collect about them and how we process it.
- Delete personal data when no longer needed.
- Are careful when sharing personal data with third parties such as cloud computing providers or other service providers.
- Include explicit personal data protection requirements in contractual agreements



ENHANCE YOUR UNDERSTANDING

Data privacy laws and regulations vary from country to country and even state to state in the U.S. If you have any questions about relevant laws or public expectations, contact your supervisor, the Global Privacy Office, Legal or Human Resources department. Examples of the types of data that require protection include:

- **Personally identifiable information (PII)**
- **Patient healthcare information (PHI)**
- Other sensitive personal data

with third parties to guarantee that personal data is protected.

- Are always thoughtful about where, when, and how you discuss patients' or other individuals' personal data.
- Consult the Global Privacy Office or Legal department if law enforcement, a regulatory authority or any other person outside the Company requests personal data or employee data.
- Immediately **report** to the Global Privacy Office or Legal any loss or inadvertent disclosure of personal, sensitive or other confidential data.



WATCH OUT FOR

- Unintentional exposure of personal, sensitive or other confidential data in public settings such as on phone calls or while working on your laptop.
- Personal, sensitive or other confidential data that is sent across borders or to third parties.
- Transmission of personal, sensitive or confidential data that is not in compliance with our policies and applicable laws.

OUR CODE IN ACTION

Q&A

Question: My best friend works in Biogen's payroll department and has access to employee data. I'm planning a party and would like to send invitations to the homes of several coworkers. May I ask my friend for their addresses?

Answer: No. This would be a breach of privacy and could result in disciplinary action for both you and your friend. You should look up address data in a public directory or ask the coworkers directly.

LEARN MORE

- » Global Data Privacy Policy
- » Global Data Protection Policy
- » Global Information Security Policy
- » Global Employee Data Protection and Privacy Notice
- » Global Data Risk Classification Policy
- » R&D Privacy Policy
- » Global Records Retention and Disposition Policy

WE PROVIDE A SECURE WORKPLACE

Biogen is committed to providing a secure workplace for its employees, contractors and visitors. Any situation that may pose a security risk must be reported immediately. Security is a shared responsibility.



MAKE SURE YOU

- Always visibly wear your ID card on campus and never allow anyone to “piggy-back” behind you into a facility or restricted area
- Notify Global Security if your ID card is lost or stolen
- Immediately report any suspicious persons or activity to Global Security
- If you are subjected to violent or threatening behavior, immediately notify Global Security, Human Resources partners or your manager
- Weapons are prohibited on Company property, which includes designated employee parking areas and at Company-sponsored events
- Smoke only in designated smoking areas



WATCH OUT FOR

- Lax adherence to security standards, such as those related to facility entry procedures and ID card usage.
- Suspicious persons behavior or activity.
- The abuse of alcohol and drugs. While modest and responsible consumption of alcoholic beverages at business functions and meals is permitted, your judgment or physical abilities should never be impaired by alcohol or drugs when you are at work, and you should always be ready to carry out your work duties.

LEARN MORE

- » Global Information Security Policy
- » Global Incident Management Policy
- » Biogen Substance Abuse Prevention Policy
- » Global Password Policy
- » Global Workplace Violence Prevention Policy
- » Global Business Continuity Management Policy
- » Discuss any questions or concerns regarding security with your **Global Security Representative**, your manager, **Compliance**, **Legal** or **Human Resources** partners.

WE PROVIDE A SAFE AND HEALTHY WORKPLACE

As a leading biotechnology company, we have the privilege and responsibility to improve the lives of patients everywhere, every day. That responsibility goes beyond providing life-saving therapies to patients. As we go about our daily work, we must also respect and care for the environment, our surrounding communities and, of course, our most valuable asset – our people. That's why we constantly strive to provide a safe, healthy, efficient and comfortable workspace for our employees.

Biogen is dedicated to protecting employees from exposure to illnesses and injuries at the workplace. Biogen has enacted various programs and services offering employees an avenue to reach the optimal level of health. Situations that may pose a health or safety hazard must be reported immediately. We can only achieve our goal of a safe and healthy workplace through the proactive participation and support of everyone.

✓ MAKE SURE YOU

- Follow safety guidelines and procedures
- **Report** unsafe conditions immediately
- **Report** all hazards, near misses and incidents to your supervisor and through myEHS within 24 hours of an occurrence
- Ask questions and share ideas for improvement

👁️ WATCH OUT FOR

- Unsafe conditions that could result in an undesired outcome such as an injury, illness, spill, fire or property damage
- Any obstacles to being able to follow guidelines and procedures

LEARN MORE

- » Global Environmental, Health and Safety Policy
- » Biogen's myEHS portal
- » Discuss any questions or concerns about safety and health with **Global EHS personnel**, **Compliance**, **Legal**, **Human Resources** partners or the **Helpline**.



OUR CODE IN ACTION

Q&A

Question: I've noticed some practices in my work area that don't seem safe. Who can I speak to? I'm new here, and don't want to be considered a troublemaker.

Answer: Discuss your concerns with your supervisor or the EHS Department. There may be very good reasons for the practices, but it's important to remember that raising a concern about safety does not cause trouble, it is being responsible.

WE ARE FAIR AND HONEST

We work to operate fairly and honestly with all our stakeholders and business partners and expect them to do the same. Our books, records and financial statements must be honest, accurate, objective, complete and timely to ensure we make sound business decisions.



WE COMMUNICATE TRANSPARENTLY

We are transparent and communicate truthful information in a manner that is not misleading. We have processes in place to help ensure our promotional, medical and investor information is appropriately vetted and approved prior to use.

WE MAINTAIN STRONG BUSINESS PARTNERSHIPS

We treat all our business partners fairly and honestly, and we expect them to act with integrity. In dealings with Biogen, suppliers and business partners must follow the Code.



✓ MAKE SURE YOU

- Consider Best Value for Money (BVM, aka Fair Market Value/FMV) and industry standards when choosing suppliers.
- Disclose any potential conflicts of interest.
- Charge all payments to the business entity or project benefiting from the payment.

- Only sign off on transactions once you fully understand them and are certain that they comply with Company policies.
- Only approve payments once you fully understand the invoice and agree with the invoice amounts.
- Only make payments in accordance with the payment terms as defined in the contract, statement of work or invoice.
- Ensure all third parties are subject to appropriate due diligence screening before entering into any business relationship.
- Communicate any issues that are identified to appropriate Biogen personnel, including Human Resources, Legal, Compliance and Finance, or the [Helpline](#).

👁️ WATCH OUT FOR

- Improperly documented payments. All payments must be made in accordance with negotiated agreements and invoices that fully and accurately set forth the nature and purpose of the transaction.
- Payments to business entities that are not listed on the original sales agreement or sales invoice.



ENHANCE YOUR UNDERSTANDING

Third parties are entities engaged by or on behalf of Biogen, including:

- Vendors
- Consultants
- Healthcare professionals
- Distributors, etc.

LEARN MORE

- » Global Anti-bribery and Anti-corruption Policy
- » Global Transactional Approval & Signature Authorization Policy
- » Global Travel & Expense Policy
- » Global Grants, Donations and Sponsorships Policy
- » Global Conflicts of Interest and Outside Activities Policy
- » Global PTP Vendor Onboarding and Management SOP
- » Global Contract Review Policy
- » Global Purchasing Policy

WE PROPERLY HANDLE BUSINESS INTELLIGENCE AND CONFIDENTIAL INFORMATION

Information about competitors is a valuable asset. We do not engage in deception to obtain competitive information. We also need to be careful when accepting information from third parties. We should know and trust their sources and be sure that the knowledge they provide is not protected by trade secret laws or confidentiality agreements.

When Biogen employs former employees of competitors, we recognize and respect the obligations of those employees not to use or disclose the confidential information of their former employers. When engagement with third parties involves sensitive or confidential information, ensure an agreement covering confidentiality is in place.

✓ MAKE SURE YOU

- Obtain competitive information only through legal and ethical means
- Respect the confidentiality obligations of others
- Require third parties to respect our information

👁 WATCH OUT FOR

- New employees who retain papers or computer records from prior employers in violation of laws or contracts
- Using confidential information without appropriate approvals
- Using job interviews as a way of collecting confidential information about competitors or others
- Information from third parties: confirm that it was obtained properly

OUR CODE IN ACTION

Q&A

Question: I am a manager, and one of my employees who recently joined Biogen from a competitor has confidential information from her previous employer. She says she plans to use it to our advantage. Should I just ignore this and let her do it?

Answer: No. If an employee retains and uses such information, it is not appropriate and can result in legal action by the competitor. You must report this to the Legal department for appropriate action.

LEARN MORE

- » Global Conflicts of Interest and Outside Activities Policy
- » Global Information Security Policy
- » Global Competition Law Policy
- » Global Publications Policy
- » Discuss any questions or concerns about collecting business intelligence with your manager, **Compliance Officer, Legal, Human Resources** partners or the **Helpline**.



COMPLETE, ACCURATE AND TIMELY DISCLOSURES AND BUSINESS RECORDS

Our Company is subject to extensive and complex reporting requirements. Our operations must comply with all applicable regulatory, accounting, financial, tax and other laws and regulations of the jurisdictions in which we operate.



Business partners, government officials, investors and the public rely on the accuracy and completeness of our financial reports, business records and what we tell them. All our financial records and accounts, and financial statements, must be clear and complete, maintained in reasonable detail and appropriately reflect our Company's transactions and activities. This includes our financial records and operational data such as cost and production data, expense reports and employee records. Accurate and complete information is also essential to us as a basis for sound decision-making.

The Company's filings with the Securities and Exchange Commission, as well as other public disclosures by or on behalf of our Company, must be fair, complete, accurate, timely and understandable. Our accounting and financial reporting practices must also comply with applicable generally accepted accounting principles and other criteria, such as local statutory reporting and tax requirements. Depending on their positions with the Company, employees may be called upon to provide necessary information to assure that the Company's filings and public communications meet these standards. The Company expects employees to take this responsibility seriously and to promptly provide current, accurate and complete answers to inquiries related to the Company's public disclosure requirements.

WE CREATE AND MANAGE RECORDS RESPONSIBLY

Each of us is responsible for information and records under our control. We need to be familiar with the records management procedures that apply to our jobs. Biogen has a records and information management policy and procedures to ensure that our financial and business records and information are appropriately maintained, stored, secured and destroyed in accordance with our business needs, and in compliance with applicable laws and regulations.

We maintain paper and electronic records for as long as required by our policies and applicable laws and regulations. Our records are organized so that they can be located and retrieved when needed. Documents should only be destroyed in accordance with our Global Records Retention and Disposition Policy, and never in response to or in anticipation of litigation, an investigation or an audit.

MAKE SURE YOU

- Create business records that accurately reflect the truth.
- Record transactions as prescribed by our system of internal controls.
- Provide timely and candid financial disclosures and forecasts to management without knowingly omitting or misrepresenting relevant or material information.
- Write carefully and clearly in all your business communications, including emails.
- Write with the understanding that someday what you write may become a public document.

- Manage and secure records based on the sensitivity of the information they contain.
- Always comply with instructions from the Legal department to retain records pursuant to a litigation or investigation hold.
- Understand and follow our recordkeeping policies.
- Contact the Information Governance team or the Legal department if there is any doubt about the appropriateness or method of record destruction.

WATCH OUT FOR

- Actions or directions to others that make our financial statements inaccurate or misleading
- Actions that might interfere in any way with the auditing of records
- Destruction of records that must be preserved

OUR CODE IN ACTION

Q&A

Question: At the end of a reporting period, my supervisor asked me to record additional expenses even though the related work has not yet started. I agreed to do it. I didn't think it made a difference since I was sure the work would be completed in the next quarter. Did I do the right thing?

Answer: No, you did not. Costs must be recorded in the period in which they are incurred. The work was not started, and the costs were not incurred by the date you recorded the transaction. That is a misrepresentation and, depending on the circumstances, could amount to fraud.

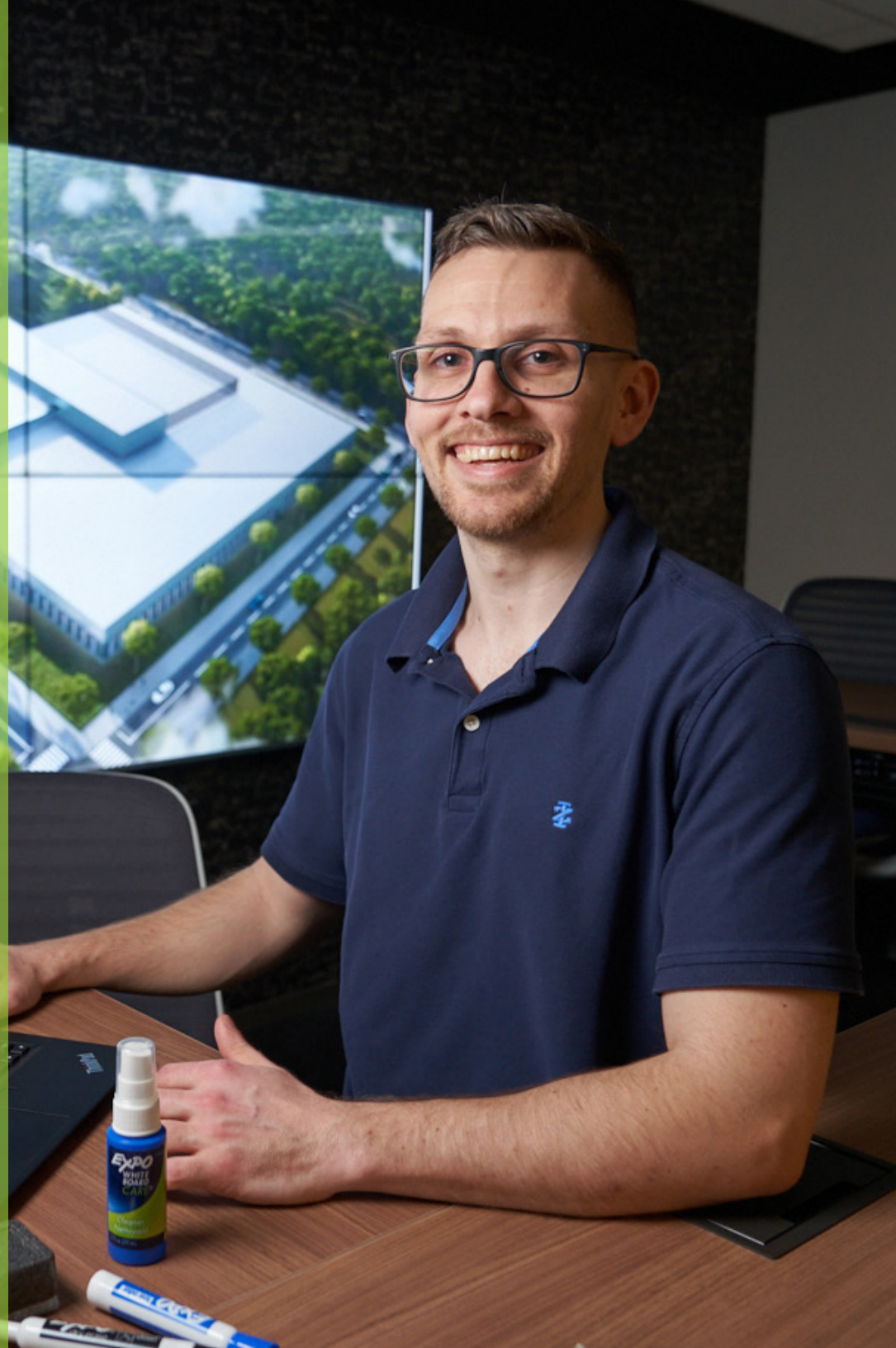
LEARN MORE

- » Global Records Retention and Disposition Policy
- » Global Email and Electronic Communication Systems Retention Policy
- » R&D Documentation Policy
- » Global Data Risk Classification Policy
- » Legal Hold Guidelines
- » Global Travel & Expense Policy
- » Global Employee Data Protection and Privacy Notice

Each of us is responsible for information and records under our control.

WE ARE TRANSPARENT AND ETHICAL

We do not offer or provide improper incentives, kickbacks or bribes to win business, to influence a business or prescribing decision, or to advance our interests with government authorities. Our interactions with healthcare professionals, government entities, government employees and others must be legitimate and never to obtain an improper advantage or to improperly influence or encourage a decision by them.



WE COOPERATE WITH REGULATORS

We comply with relevant laws and regulations and cooperate with government agencies, law enforcement officials and investigators.

✓ **MAKE SURE YOU**

- Contact the Legal department immediately and wait for their guidance before responding to any inquiries from government regulators or officials.
- Take prompt action, when notified of an external investigation, to preserve documents that may be relevant and respond to requests for information in an honest and timely manner.
- Cooperate fully and truthfully with investigators.

👁️ **WATCH OUT FOR**

- Temptation to mislead an investigator – Don't do it
- Desire to alter or destroy records – It's illegal



ENHANCE YOUR UNDERSTANDING

What happens during an investigation?

- The facts of the case will typically be developed through interviews and document review.
- Depending on the nature of the investigation and the matters at issue, you may be instructed by the investigators or the Legal department not to discuss any aspect of the investigation.
- If misconduct is discovered, the Company will take whatever corrective or disciplinary action is necessary to address the situation and prevent a recurrence.

OUR CODE IN ACTION

Question: Why are we expected to cooperate with ethics and compliance investigations? I would rather not get involved.

Answer: Your assistance is important, and it is your responsibility to cooperate. When the Company investigates, it is reviewing a possible violation of the Code, Biogen policies or relevant legal requirements. If employees do not cooperate, it is impossible to get all the facts and take the appropriate corrective actions. Withholding information or knowingly giving false or misleading information is a serious violation of our duties as employees, and could result in disciplinary action, up to and including termination of employment.

Q&A

WE AVOID BRIBERY AND CORRUPTION

We do business with honesty and integrity and prioritize compliance with all applicable ethical and legal standards. We are committed to complying with the laws of all countries where we operate, which prohibit bribing government officials. We also comply with applicable laws that prohibit bribes paid to private individuals.

Due to the complexity of anti-corruption and bribery laws worldwide, it is important that employees be aware of Company policies and ask questions if they have any doubts about the proper course of action. If you have questions, contact your supervisor or local compliance partner.

We are responsible for third parties acting on our behalf. We perform due diligence and carefully monitor our business partners and require them to operate in compliance with our Code and our standards.

MAKE SURE YOU

- Are aware of applicable bribery and corruption policies.
- Never offer money or any item of value to improperly influence a business decision.

- Never make payments to improperly influence a government official.
- Ensure all third parties engaged by or on behalf of Biogen are subject to appropriate due diligence screening before entering into any business relationship.
- Ask questions and address compliance concerns to appropriate Biogen personnel, including Legal, Compliance, Finance or the [Helpline](#).

WATCH OUT FOR

- Unethical or suspicious conduct by a supplier or business partner. If you have concerns, contact management
- Requests to make facilitation payments



ENHANCE YOUR UNDERSTANDING

Facilitation or expediting payments

are modest amounts of money paid as an unofficial fee to low level government employees to speed or initiate the performance of routine service. They are prohibited by our policies. If you are solicited for a facilitation or expediting payment, contact the Legal department Immediately.

Government officials include politicians, civil servants and employees of state-owned enterprises, such as physicians employed by state-run hospitals.

OUR CODE IN ACTION

Q&A

Question: Sometimes, during business travel, I see practices that I consider inappropriate, but they are common practices in the country I'm visiting. What should I do if I'm asked to provide what I consider to be a bribe but what the locals think of as common business courtesies?

Answer: No matter where you are, our policy applies. You should consult with your Compliance Officer or Legal if you have questions.

LEARN MORE

- » Global Anti-Bribery and Anti-Corruption Policy
- » Global Conflicts of Interest and Outside Activities Policy
- » Global External Stakeholders Engagement SOP
- » Global Contract Review Policy
- » Global PTP Vendor Onboarding and Management SOP
- » Global Transaction Approval and Signature Policy
- » Global Investigations Protocol
- » R&D Ethical Conduct Policy
- » Global Travel and Expense Policy

WE ENGAGE IN FAIR BUSINESS PRACTICES

We believe in free and open competition. We never look to gain competitive advantages through unethical or illegal business practices. We do not enter into agreements with competitors to engage in any anti-competitive behavior, including setting prices or dividing markets. We do not engage in unfair or deceptive acts or practices, such as false or misleading advertising, or other misrepresentation.



✓ MAKE SURE YOU

- Understand that antitrust and competition laws are complex, and compliance requirements will depend on the circumstances
- The following activities should be avoided:
 - **Collusion:** When companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, or allocations of markets.
 - **Bid-rigging:** When competitors manipulate the bidding process. This may include comparing bids, agreeing to refrain from bidding or knowingly submitting non-competitive bids.
 - **Predatory pricing:** When a company with market power sells a product or service below cost so as to eliminate or harm a competitor. Never share our competitive information with our competitors.

👁 WATCH OUT FOR

- Formal or informal conversations with competitors about sensitive business information.
- Use of nonpublic information about competitors received from new hires or interviewees.
- Conversations with competitors that could be perceived as limiting competition. If such a conversation begins, leave the meeting immediately and report it to the Legal department.

LEARN MORE

» Global Competition Law Policy

OUR CODE IN ACTION

Question: I received sensitive pricing information from one of our competitors. What should I do?

Answer: Contact the Legal or **Compliance** departments without delay and before any further action is taken.

Q&A

WE CONDUCT INTERNATIONAL TRADE LEGALLY

We comply with all applicable customs regulations, export controls and trade sanctions laws. This allows us to deliver our medicines in a timely manner to patients who need them, while building trust with society. We expect our business partners to do the same. International trade laws and regulations evolve dynamically, and we must adjust our processes to the changing geopolitical environment.

✓ MAKE SURE YOU

- Know the business partners with whom you are dealing, as well as the final destination and end use of our products.
- Ensure that you do not engage with persons or companies that have been placed by governments on sanctioned party lists.
- Obtain all necessary licenses before the export or deemed export and import of products, services or technology.
- Report complete and accurate information on every imported/exported product, such as its proper customs classification, origin and custom valuation.
- Do not use the Company name or registration for import/export of personal orders.
- Ensure all third parties engaged by or on behalf of Biogen are subject to appropriate due diligence including sanction screening before entering into any business relationship.
- Consult with the designated individual within their organization, Global Trade Compliance or the Legal department as early as possible about local laws on exporting/importing products, information and technology.
- **Report** any compliance concerns to appropriate Biogen personnel.

👁️ WATCH OUT FOR

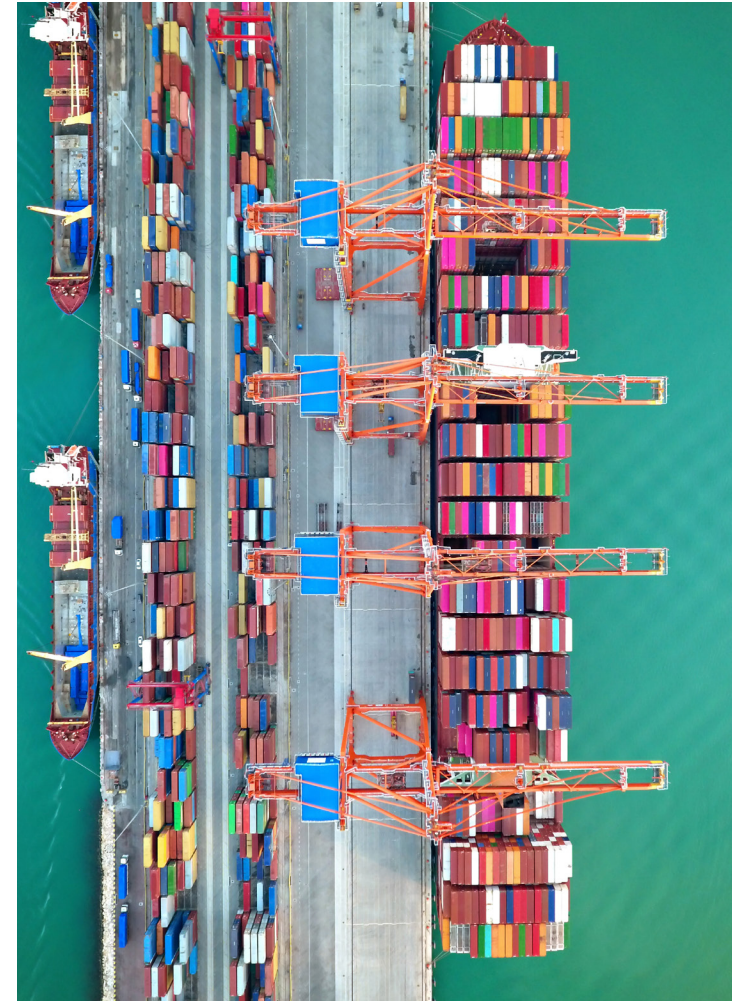
- Any request to join in, support or furnish information concerning a non-U.S. boycott must be immediately reported to the Legal department before taking any action.



ENHANCE YOUR UNDERSTANDING

Export control restrictions apply not only to goods but also covers the transfer of technology and intangible technical data, based on national regulation. For example, in the U.S. and many countries these controls include:

- Transfers of technical data to someone in another country, including to our fellow employees as well as non-employees.
- Discussions with any non-U.S. person that discloses technical information.
- Visual inspections by any non-U.S. person of U.S.-origin equipment and facilities.
- Certain technical data and information to a non-U.S. person that may be a “deemed export” to the country where the non-U.S. person is a citizen, even if the release occurs inside the United States.





ENHANCE YOUR UNDERSTANDING

Economic and trade sanctions stemming from the laws of the United States, Switzerland, the European Union, the United Kingdom and other countries also contain prohibitions against dealing with specifically identified countries, persons or organizations, including those countries where the United States enforces economic and trade sanctions, including:

- Cuba
- Iran
- North Korea
- Syria
- Crimea region
- Additionally, there is a significant sanctions program on Russia and Belarus related to the war in Ukraine

Anti-boycott provisions of U.S. law prohibit and/or penalize U.S. companies and those controlled by U.S. companies from participating in or cooperating with foreign boycotts that the United States does not sanction. These laws, which are primarily targeted at the Arab League boycott of Israel, also impose certain reporting requirements.

International trade compliance also involves complying with documented procedures and work instructions to help ensure that complete and accurate customs declarations are made to the relevant customs authorities in all jurisdictions. Customs authorities require that accurate information be disclosed with respect to inbound shipments, so that applicable duties, taxes and fees may be levied, and so that compliance with various border-enforced laws and regulations can be ensured.



LEARN MORE

- » Global Trade Compliance Policy
- » Global Biogen Export Controls Embargo and Sanctions Policy
- » Global Custom Valuation Policy
- » Discuss any questions or concerns about international business with your manager, **Global Trade Compliance**, Compliance Officer, Legal, Human Resources partners or contact the **Helpline**.

WE ENGAGE IN THE POLITICAL PROCESS RESPONSIBLY

Biogen employees have the right to voluntarily participate in the political process. This includes making personal political contributions and advocating as a private citizen.

✓ MAKE SURE YOU

- Receive all needed approvals before using Company resources to support political activities
- Seek approval from Government Affairs before engaging in lobbying activities
- Make sure your personal political views and activities are not viewed as those of the Company
- Never use Company funds, assets, services or facilities to support any political candidate or party

👁 WATCH OUT FOR

- **Improper influence:** Avoid even the appearance that your contributions or participation in political activities may be intended to gain improper influence.
- **Conflicts of interest:** Holding or campaigning for political office must not create even the appearance of a conflict of interest with your duties to the Company.

OUR CODE IN ACTION

Q&A

Question: I will be attending a fundraiser for a local political candidate. Is it OK to list my position at Biogen if I don't use any Company funds or resources?

Answer: You will need to understand and comply with the laws and regulations that apply to your contribution. For example, U.S Federal law requires candidates for federal office to collect information from donors contributing \$200 or more including their employer's information (other countries have similar laws). You must provide this legally required information, but under no circumstances can you indicate that your participation or support in political activities is representative of Biogen views.

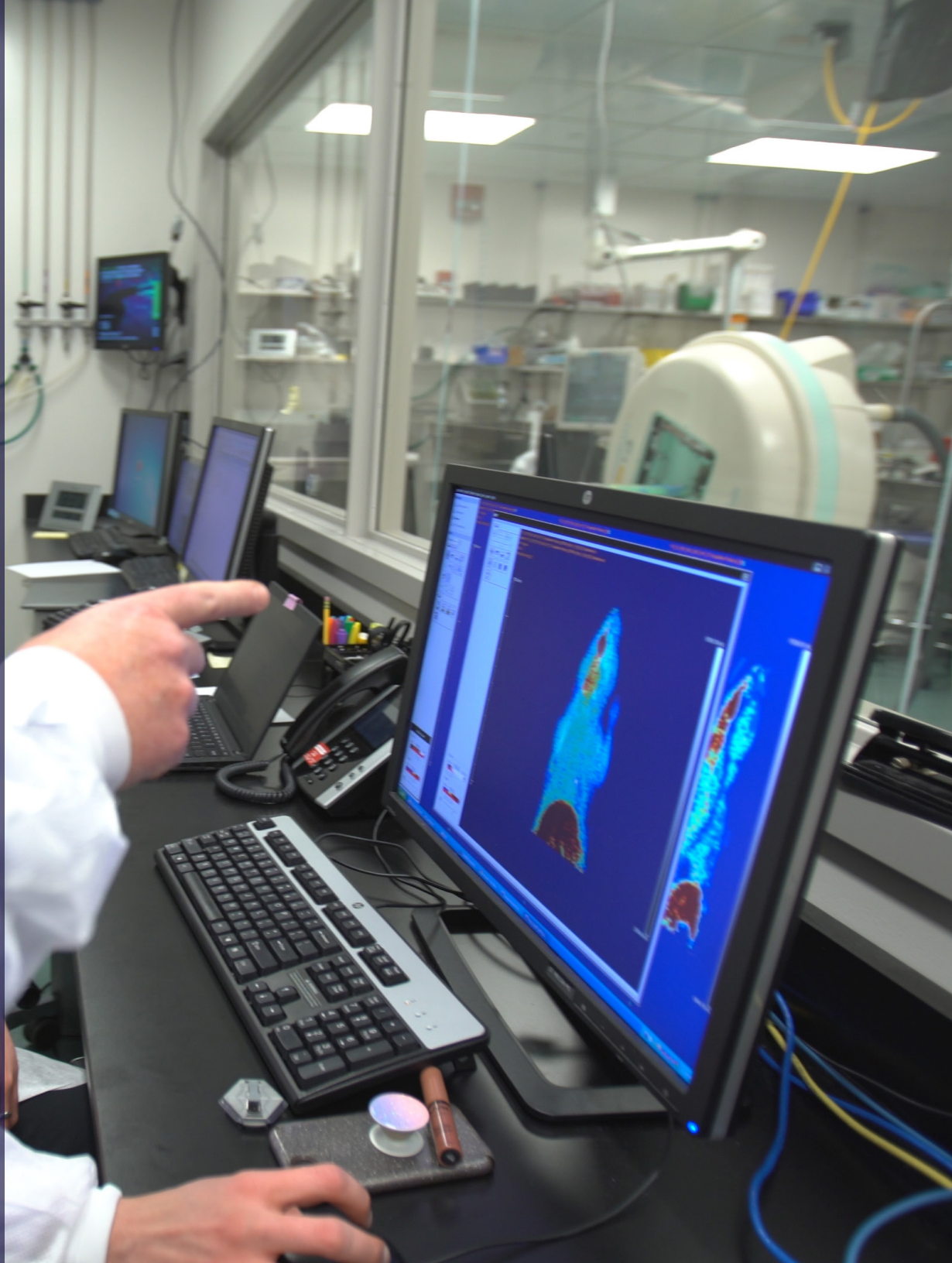
LEARN MORE

- » Political Contributions Policy
- » Global Conflicts of Interest and Outside Activities Policy
- » Discuss any questions or concerns about political contributions or political activities, with your manager, the Government Affairs department, Compliance Officer, Legal or contact the [Helpline](#).



WE PROTECT INFORMATION AND ASSETS

We respect individuals' privacy and safeguard the security of the data we collect. Protecting the information we hold is fundamental to our commitment to patients, healthcare professionals, business partners, employees and the communities we serve.



WE TREAT SENSITIVE INFORMATION WITH CARE

One of our most valuable assets is information. Each of us must be vigilant and protect Biogen's sensitive or confidential information, as well as sensitive and confidential information disclosed to us. Your obligation to preserve Biogen's sensitive and confidential information continues even after your employment with our Company ends.

✓ MAKE SURE YOU

- Use and disclose sensitive and confidential information only for legitimate business purposes.
- If sharing externally, use appropriate contract templates or confer with legal to determine what safeguards should be in place.
- Properly label sensitive and confidential information to indicate how it should be handled, distributed and destroyed in accordance with applicable policies.
- Only store or communicate Company information using Biogen's information systems or approved storage devices/locations.
- If required to transfer highly sensitive or confidential information, ensure that the

appropriate security controls and methods are used, including encryption.

- Safeguard Company assets and ensure that the appropriate authorization is obtained for the use or disposition of Company assets.

👁 WATCH OUT FOR

- Discussions about sensitive or confidential information when others might be able to overhear what is being said – for example, on planes, elevators and when using mobile phones.
- Transmission of sensitive information to unattended fax machines or printers.
- Leaving your work area unattended with confidential information displayed.

LEARN MORE

- » Global Data Protection Policy
- » Global Information Security Policy
- » Global Mobile Technologies & Acceptable Use Policy
- » Global Data Risk Classification Policy
- » Global Records Retention and Disposition Policy
- » Global Publications Policy
- » Discuss any questions or concerns about highly sensitive or confidential information with your manager, **Information Governance, Global Privacy Office**, Legal or Human Resources partners.



WE COMPLY WITH ALL INSIDER TRADING LAWS

We do not use Biogen information or information from our business partners for personal benefit. Biogen directors, officers, employees and temporary staff worldwide, as well as their immediate family members, are prohibited from engaging in insider trading. Violations of the insider trading laws are severe and include civil and criminal fines and penalties. It is your responsibility to ensure that you do not violate insider trading laws or our Global Insider Trading and Information Policy.

MAKE SURE YOU

- Do not buy or sell securities of Biogen or any other company when you have material nonpublic information about Biogen or that other company unless you do so pursuant to an approved Rule 10b5-1 trading plan.
- Do not communicate material nonpublic information to any other person (i.e., “tipping”).
- Do not engage in short sales, puts, calls, hedging transactions, margin accounts, pledges or other derivative transactions related to Biogen securities.
- Do not trade during “blackout periods” if you have been notified you are subject to such trading restrictions (unless you have previously entered into a 10b5-1 trading plan when you were not aware of material nonpublic information).

WATCH OUT FOR

- Requests by friends or family for information about Biogen, our customers or any other company with which we do business. Even casual conversations could be viewed as illegal “tipping” of inside information.

LEARN MORE

» Global Insider Trading and Information Policy

OUR CODE IN ACTION

Q&A

Question: I am aware of a significant new development in our business that I think is going to significantly increase the value of the Company’s stock. I know that I am prohibited from buying stock, but I can recommend that my friend invest in our Company, right?

Answer: No, you must not do that. You are correct that you may not trade in Company stock with this information, as it is “material nonpublic information.” Trading in Company stock while in possession of this type of information is insider trading and against the law. However, you are also forbidden by Company policy and the law from making any recommendations to others to buy or sell Company stock based on this type of information, even if you do not share that information when making the recommendation. Doing so would be considered “tipping” and could subject both you and your friend to civil and criminal penalties.



ENHANCE YOUR UNDERSTANDING

Material information is information that a reasonable investor would consider important in deciding whether to buy, sell or hold a security. Examples that may be considered material:

- A pending or proposed acquisition, sale or other significant transaction
- Results of late-stage clinical trials
- A significant product development or important information about a product, such as serious product safety issues
- Receipt of regulatory approval or failure to obtain regulatory approval for products
- Significant litigation or patent-related events
- Earnings or financial performance

Information is considered nonpublic if it has not been previously disclosed to the public through press releases or SEC filings and is otherwise not available to the general public. Information is generally considered “public” after it has been publicly available for at least 24 hours after disclosure.

WE USE COMPANY ASSETS ETHICALLY

We are each personally responsible for protecting Company assets and using them with care. Personal use of Company assets is discouraged. All information that is sent or received through our devices, networks, systems or services is part of official Company records, and we can be legally required to show those records. Therefore, make sure that business information you process is accurate, appropriate, ethical and legal.

MAKE SURE YOU

- Use Biogen assets and services only for legitimate business purposes
- Only use Biogen sanctioned devices and services to store business data and to conduct Biogen business
- Always use strong passwords or passphrases and use unique passwords wherever possible

WATCH OUT FOR

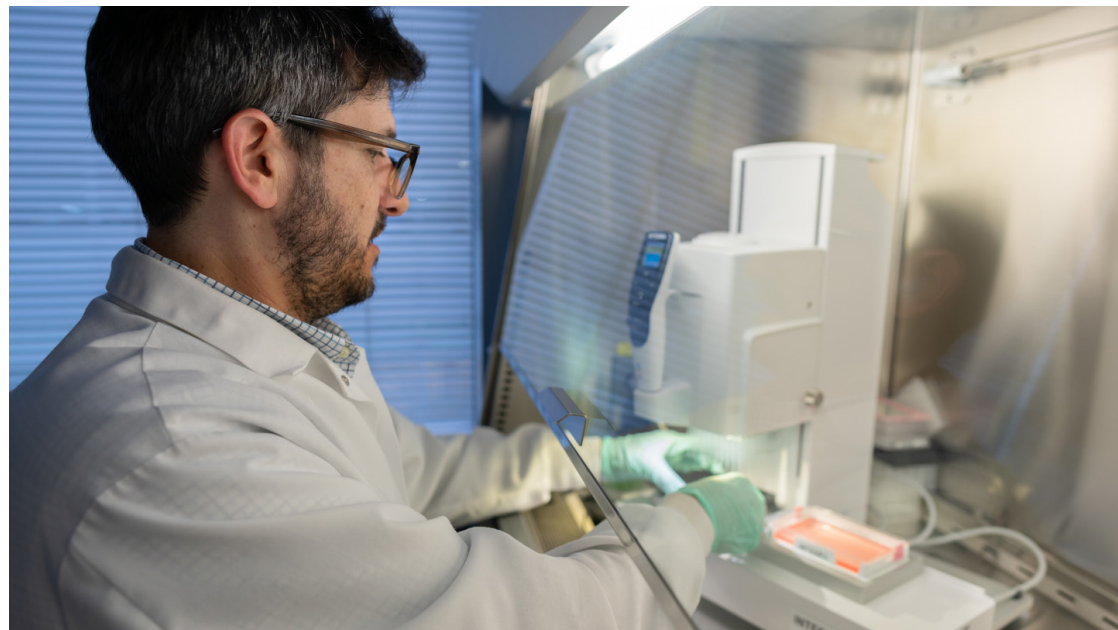
- Inappropriate use of Biogen resources for personal purposes or excessive use that has an adverse effect on productivity
- Sharing passwords or using Biogen credentials for personal accounts
- Using Biogen equipment or information systems to create, store or send content that others might find offensive



ENHANCE YOUR UNDERSTANDING

We use AI Ethically

AI, or artificial intelligence, refers to the development and use of computer systems that are capable of performing tasks that typically require human intelligence. We believe that the responsible use of AI can help us to advance our work to improve the lives of patients and the communities we serve. We are committed to ensuring that our use of AI supports ethical and validated research and promotes equity. We recognize the potential risks and challenges associated with AI, and are dedicated to using it in a way that is transparent, responsible, ethical and compliant.



LEARN MORE

- » Global Password Policy
- » Global Conflicts of Interest and Outside Activity Policy
- » Global Contract Review Policy
- » Global Mobile Technologies & Acceptable Use Policy
- » Global Purchasing Policy
- » Global Transaction Approval & Signature Policy
- » Global Travel and Expense Policy
- » Global Email and Electronic Communication Systems Retention Policy
- » Discuss any questions or concerns about protecting Biogen assets with your manager, Global IT Security, Compliance Officer, Legal, Human Resources partners or the **Helpline**.

WE SAFEGUARD INTELLECTUAL PROPERTY

Biogen's intellectual property (IP) is an important asset that must be protected.

✓ MAKE SURE YOU

- Promptly disclose to Company management any inventions or other IP that you create while you are employed by Biogen
- Properly label confidential information to indicate how it should be handled, distributed and destroyed
- Protect IP by sharing it only with authorized parties

👁 WATCH OUT FOR

- Excessive or inappropriate use of Biogen resources for personal purposes
- Sharing passwords



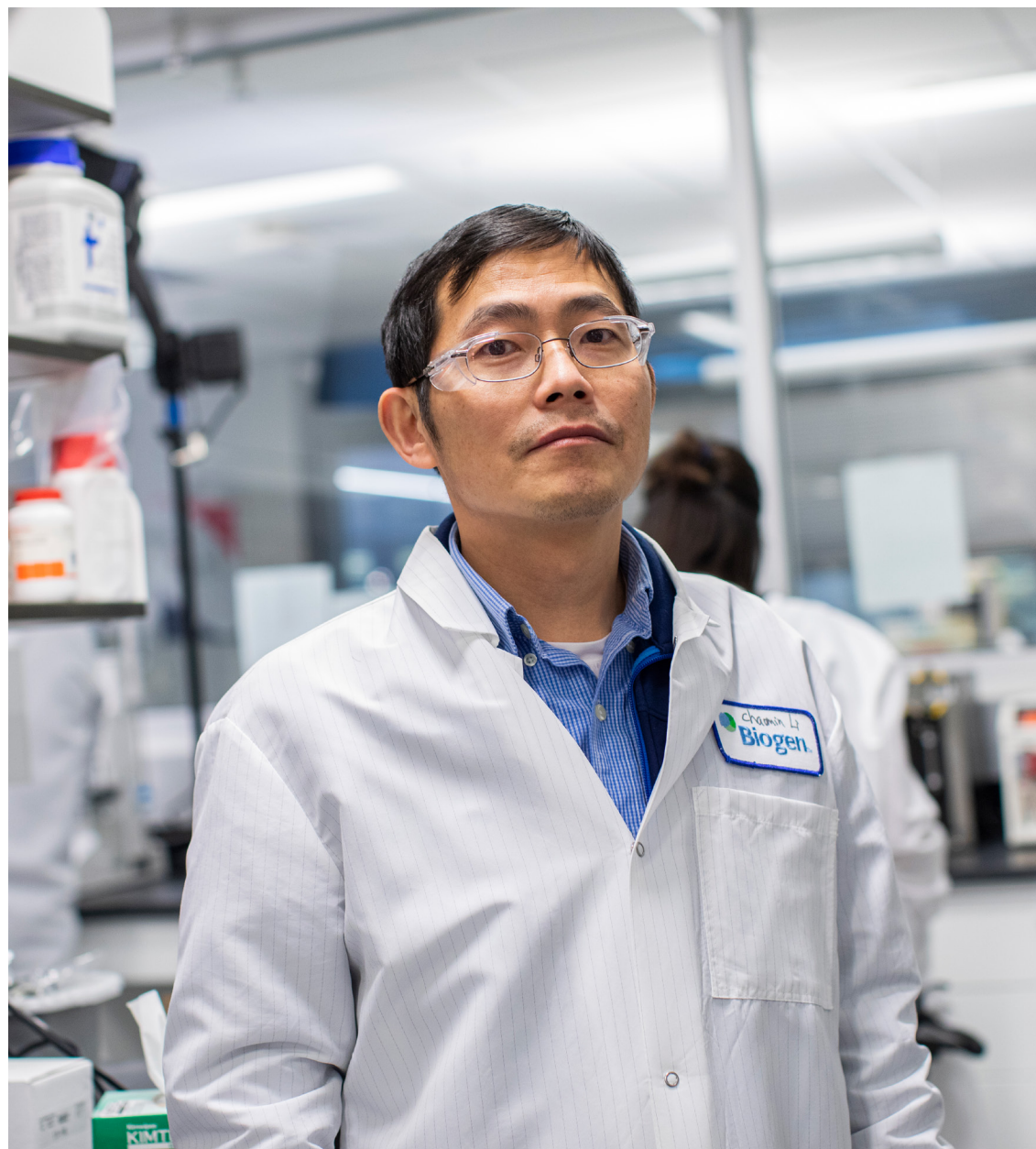
ENHANCE YOUR UNDERSTANDING

Some examples of **Intellectual Property** include:

- Trade secrets and discoveries
- Methods, know-how and techniques
- Innovations and designs
- Systems, software and technology
- Patents, trademarks and copyrights

LEARN MORE

- » Global Contract Review Policy
- » Global Information Security Policy
- » Global Password Policy
- » Global Publications Policy
- » Discuss any questions or concerns about IP-related communications with your manager or Legal.



WE COMMUNICATE WITH THE PUBLIC ONLY WHEN AUTHORIZED

To achieve a consistent voice and message when making disclosures or providing information to the public, only authorized persons may speak on behalf of the Company. Our colleagues in Corporate Affairs, Investor Relations and the Executive Management team are the only Company employees authorized to speak to media and the financial community.



MAKE SURE YOU

- Never speak publicly on issues involving the Company without prior authorization from Corporate Affairs or Investor Relations. All content must then be reviewed and approved, and the speaker must have the appropriate training.
- Refer any inquiries about our activities, sales or financial results or strategic plans to Corporate Affairs or Investor Relations.
- Get approval from Corporate Affairs before distributing any communication intended for a broad employee audience.
- Are careful when using social media, including personal use of social media that is not related to business you conduct on behalf of Biogen.
- Do not discuss Biogen or our business in online forums, blogs or bulletin boards.
- Never give the impression that you are speaking on behalf of Biogen, unless authorized.



WATCH OUT FOR

- Any suggestion in your personal communications that you speak for the Company.
- Using your Company title or affiliation outside work (such as in non-Company-sponsored charitable or community work) without making clear that you are not representing the Company.
- Hitting the “send” button without thinking carefully.
- Sending emails or posting confidential information or material that could damage the Company's reputation.

LEARN MORE

- » Global Social Media Policy
- » Global Social Media - Personal Use Policy
- » Global Sponsorships, Donations and Grants Policy
- » Discuss any questions or concerns about public communications with your manager or Corporate Affairs.

WE NEVER COMPROMISE OUR INTEGRITY

Integrity is the foundation on which we build our business. We demonstrate integrity and earn the trust and respect of our constituencies through the actions of every employee. We do what we say, and we say what we mean.



WE ADDRESS CONFLICTS OF INTEREST

A conflict of interest occurs when we have competing interests that may interfere with our ability to make objective decisions. We are expected to use good judgment and avoid situations that can lead to even the appearance of a conflict of interest. Conflicts of interest may be actual or just a matter of perception. Since these situations are not always clear-cut, we fully disclose them and discuss them with our manager. Your manager, People Relations, Legal or Compliance may be involved in reviewing, discussing and resolving conflicts of interest situations.

MAKE SURE YOU

- Discuss with your manager and disclose the full details of any situation that could be perceived as a conflict of interest
- Proactively address situations that may put your interests or those of your family in conflict with Biogen
- Avoid using your position or Company resources for personal advantage
- Report potential conflicts of interest in the COI disclosure as per the Global Conflicts of Interest and Outside Activities Policy

WATCH OUT FOR

Situations such as the following, which are common examples of conflicts of interest:

- **Self-Dealing & Corporate Opportunities:** If you learn about a business opportunity because of your job, do not take that opportunity for yourself unless you get appropriate Biogen approval. Also, giving business to a firm that will benefit an employee or family member is another example of a conflict of interest.
- **Outside Activities:** Consulting or Outside Work should be discussed with your manager. Also, any approved personal business that you or your family operates should not compete with Biogen.
- **Financial Dealings and Investments:** Ownership by you or your family of an interest in a company that is a competitor, vendor, supplier, customer or partner of the Company could be a conflict. In general, any outside activities with competitors are strictly prohibited.
- **Participating in Other Organizations:** You shouldn't accept a seat on the board of directors or advisory board of, or volunteer with, any of our competitors, suppliers, customers or partners without appropriate approval.
- **Personal Relationships:** Romantic or personal relationships may create perceived conflicts of interest and should be discussed with your manager and Human Resources. You should disclose any personal relationship with colleagues or external stakeholders that may be perceived as involving a potential conflict of interest, using the link provided in the Global Conflicts of Interest and Outside Activities Policy. If you are uncertain if the relationship qualifies as a conflict of interest, you should discuss it with your Compliance Officer.
- **Gifts & Entertainment:** Acceptance by you of gifts or other benefits greater than nominal value could be a conflict of interest.

OUR CODE IN ACTION

Q&A

Question: I work in a Biogen manufacturing facility. I'm having trouble covering my personal expenses and am thinking of getting a second job. I found one that seems perfect at MegaPharma, a Biogen supplier, and applied for it. MegaPharma called to offer me the job. What should I do before starting the job?

Answer: You should disclose the new job opportunity to your manager to determine whether there is a conflict and how best to handle it. The important thing is for you to follow the guidance as outlined in the Global Conflicts of Interest and Outside Activities Policy so the appropriate reviewers can help you work through the issues and manage any potential conflicts.

LEARN MORE

» Global Conflicts of Interest and Outside Activities Policy

WE COMPLY WITH GIFTS AND HOSPITALITY RULES

In the right circumstances, a modest gift may be a thoughtful “thank you,” or a meal may be an appropriate setting for a business discussion. However, if not handled carefully, the exchange of gifts and hospitality can create the appearance of a conflict of interest, especially if it happens frequently or if the value is large.

When it comes to gifts and hospitality, Biogen’s position is straightforward: we do not accept or provide gifts or hospitality or any other item of value if the intent is to influence a business decision. Gifts of cash or cash equivalents (e.g. stock or other forms of marketable securities) or cash-redeemable gift cards or gift certificates are never allowed. And, when it comes to healthcare professionals, special rules apply. Those rules should be followed regardless of intent. Additional information regarding the provision of gifts and other items to healthcare professionals may be found by referring to the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA) Code of Practice and Biogen written standards.

MAKE SURE YOU

- Use sound judgement, only provide and accept gifts and hospitality that are permissible by law and policy and that are reasonable complements to business relationships.
- Understand and comply with the policies of the recipient’s organization before offering or providing gifts, hospitality or any other item of value.
- Do not accept a gift, hospitality or entertainment from a business connection that is not modest and reasonable and that may give the appearance of improper influence.

- Discuss with your manager and disclose the full details of any situation that could be perceived as a conflict of interest.

WATCH OUT FOR

- Situations that could embarrass you, Biogen or the recipient
- Relationships and transactions that could create a perception of divided loyalties or improper influence

LEARN MORE

- » Global Conflicts of Interest and Outside Activities Policy
- » Global Antibribery and Anticorruption Policy
- » Global Contract Review Policy
- » Global Travel and Expense Policy
- » Global External Stakeholder Engagement SOP
- » Global Transaction Approval & Signature Policy
- » IFPMA Code of Practice



ENHANCE YOUR UNDERSTANDING

Interactions with government employees involve additional considerations beyond the kind of common sense, sound judgment principles described above. We are committed to complying with the many legal, regulatory and contractual requirements that specifically apply to government-related work around the world. To that end, you must always make sure you know whether you are dealing with a government official or government-related entity and follow rules applicable to them. The Government Affairs, Legal and Compliance departments are available to help you with questions about who may be a government representative.

OUR CODE IN ACTION

Q&A

Question: While traveling, I received a gift from a business partner that I believe was excessive.

Answer: You need to let your manager know or report it to your Compliance Officer as soon as possible. We may need to return the gift with a letter explaining our policy. If a gift is perishable or impractical to return, another option may be to distribute to employees or donate it to charity, with a letter of explanation to the donor.

WE COMPLY WITH LAWS, REGULATIONS AND STANDARDS

We live and work in a global environment and face several laws and regulations governing our industry's operations. These laws and regulations have a direct impact on our daily work. They also govern our interactions with our many business partners and associates such as researchers, patients, healthcare professionals and governments.



We understand that these laws and regulations are there to help protect our employees and the patients, customers and investors we serve. For that simple reason, we are committed to upholding the letter and spirit of these laws and regulations wherever we do business, succinctly summarized as follows:

- Everywhere we operate, we must be aware of and comply with laws and regulations that govern our business activities.
- Since we operate in many different countries and jurisdictions, there may seem to be a conflict between applicable laws. When you encounter such a conflict, consult with the Legal Department.

We comply with applicable global standards such as:

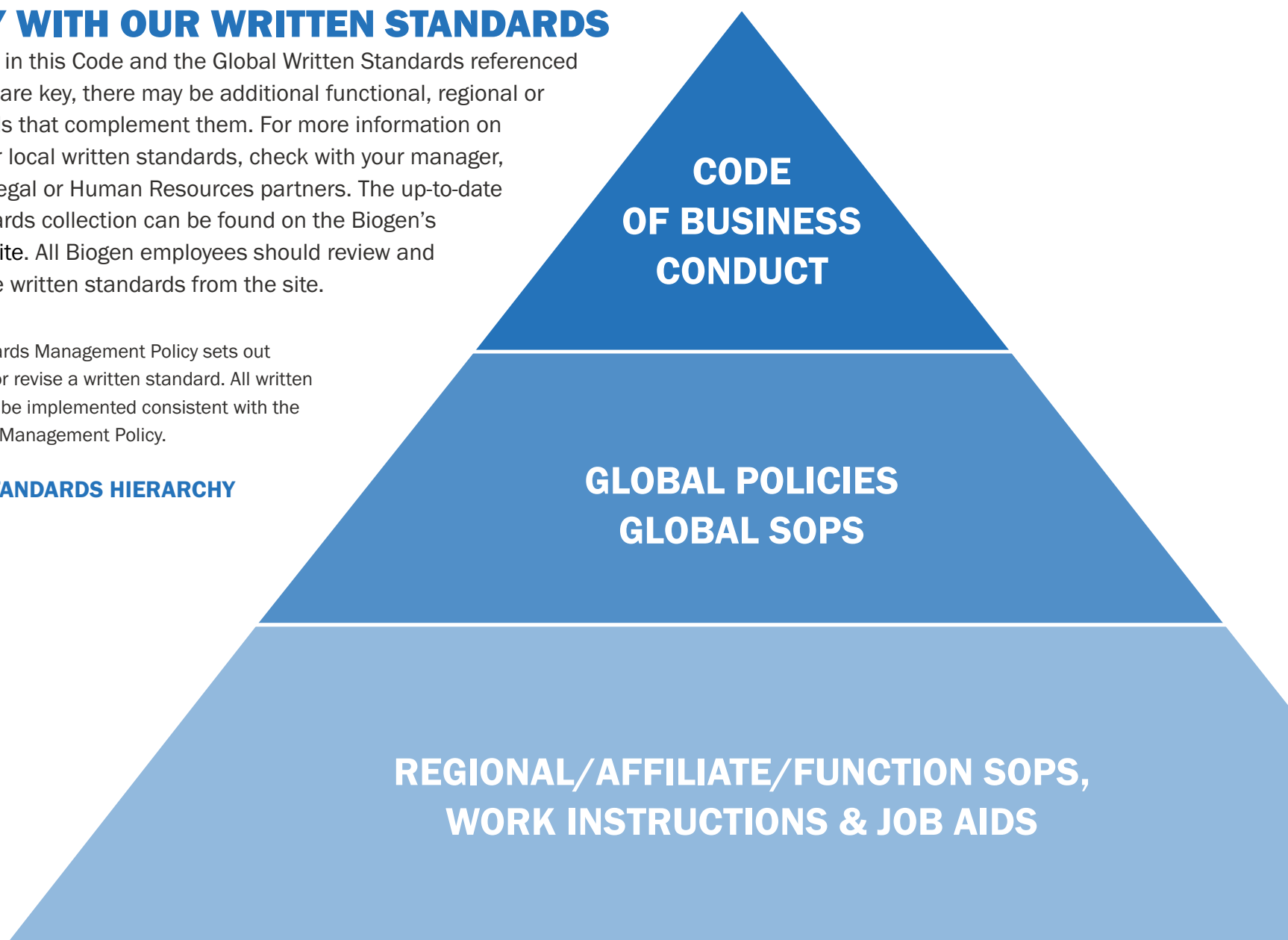
- The International Labour Office Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy
- The Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- The Declaration of Helsinki
- Good Laboratory Practices (GLPs)
- Good Clinical Practices (GCPs)
- Good Manufacturing Practices (GMPs)
- The Biotechnology Industry Organization Statement on Protecting Research and Research Participants
- The Pharmaceutical Research and Manufacturers of America's (PhRMA) Code on Interactions with Healthcare Professionals, Guiding Principles on Direct-to-Consumer Advertising, and Conduct of Clinical Trials
- The European Federation of Pharmaceutical Industries and Association (EFPIA)
- The International Federation of Pharmaceutical Manufacturers and Associations (IFPMA)
- Rules and regulations issued by the U.S. Securities and Exchange Commission
- [Biogen Climate Change Position Statement](#)
- [Biogen Human Rights Position Statement](#)

WE COMPLY WITH OUR WRITTEN STANDARDS

While the information in this Code and the Global Written Standards referenced throughout this Code are key, there may be additional functional, regional or local written standards that complement them. For more information on functional, regional or local written standards, check with your manager, Compliance Officer, Legal or Human Resources partners. The up-to-date Global Written Standards collection can be found on the Biogen's intraweb – [Synapse](#) site. All Biogen employees should review and refer to the applicable written standards from the site.

The Global Written Standards Management Policy sets out requirements to develop or revise a written standard. All written standards are required to be implemented consistent with the Global Written Standards Management Policy.

BIOGEN WRITTEN STANDARDS HIERARCHY





CODE OF BUSINESS CONDUCT

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