

Code of Conduct and Business Ethics

REVISED MARCH 2025



OUR MISSION

To unlock the power of gene therapy to accelerate healthcare transformation.

OUR VISION

A world where no life is limited by disease.

Living our values

CHAMPION THE PATIENT.

BREAK THE BARRIERS.

OWN YOUR EXCELLENCE.

COMMIT TO COLLABORATE.

DEMONSTRATE THE RESPECT YOU SEEK.



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Purpose of code and reporting concerns

OUR COMMITMENT TO BUSINESS ETHICS

The Spark Code of Conduct and Business Ethics (the “Code”) applies to all employees and others acting on behalf of Spark Therapeutics, Inc. (the “Company” or “Spark”). Spark expects its independent contractors, consultants and other third parties working with Spark to comply with all applicable laws and regulations, as well as with the compliance principles set forth in the Code.

The Company strives to uphold high legal and ethical principles and standards and has adopted the Code to promote:

- Compliance with applicable governmental laws and regulations;
- Honest and ethical conduct, including the identification and mitigation of actual or apparent conflicts of interest;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Roche Group (as a subsidiary), regulatory agencies and in the Company’s other public communications;
- The prompt internal reporting of any suspected violations of the Code to appropriate persons or through the Spark Compliance and Business Ethics Helpline;
- Complete cooperation in the investigation of reported violations and the provision of truthful, complete and accurate information; and
- Accountability for adherence to the Code.

YOUR RESPONSIBILITIES

The Code is meant to familiarize you with the Company’s commitment to conducting business in a lawful and ethical manner. Although the Code references other Spark policies, it does not supersede those policies. It is important that all employees read, understand and comply with the Code and other policies that apply to them as employees of Spark and to their specific position.

We expect all Spark employees to:

- Understand and comply with the Code and all other Spark policies;
- Act with honesty, integrity and high ethical standards in conducting Spark business;
- Always treat fellow employees, patients and others with whom we do business with dignity and respect;
- Ask questions if you are unsure about what to do in a particular situation;
- Promptly report any action that you suspect violates the law, the Code, honest or ethical behavior, or any other Spark policy through the Compliance and Business Ethics Helpline or other appropriate channel;
- Fully and honestly cooperate with any Company investigation of alleged misconduct;
- Refrain from engaging in any conduct that is, or may be perceived to be, retaliatory against anyone for raising a good faith question or concern about compliance with policy or legal requirements; and
- Demonstrate a commitment to and embodiment of diversity, equity and inclusion principles and behaviors.

ADDITIONAL RESPONSIBILITIES OF MANAGERS AND OFFICERS

If you are a manager or officer, you have additional responsibilities and must serve as a positive role model for employees.

Managers and officers are responsible for:

- Cultivating an inclusive and emotionally and physically safe environment where employees are encouraged to ask questions and raise concerns without hesitation or fear of retaliation;
- Demonstrating commitment to maintaining high ethical standards and the importance of compliance with the Code;
- Enforcing and complying with the Code;
- Promoting honest and ethical conduct, including the identification and mitigation of actual or apparent conflicts of interest;
- Promptly reporting any and all suspected violations of the law, the Code or other Spark policies; and
- Consistently demonstrating commitment to and embodiment of diversity, equity and inclusion through inclusive leadership behaviors, decisions and practices.

RESPONSIBILITIES FOR IMPLEMENTATION AND ADMINISTRATION

Spark's compliance program is designed to support legal and ethical conduct throughout the Company. The Corporate Management Team is responsible for overseeing the implementation of the Code, but each individual is accountable for adhering to it. The Company has designated Spark's head of Corporate Compliance with the administration of the Code, unless otherwise noted.

MAKING THE RIGHT DECISIONS

The Code does not and cannot cover every possible situation or activity governed by the laws, rules, regulations and ethical standards applicable to our industry. Rather, it summarizes certain laws and principles of ethical business conduct and provides guideposts to assist you in engaging in lawful and ethical conduct. These laws, rules and regulations can be complex and difficult.

Q: HOW DO I KNOW WHETHER A PARTICULAR ACTION VIOLATES THE CODE?

A: Ask yourself some of these questions:

- Is this action lawful?
- Could the action adversely affect patient safety or product quality?
- Does this action comply with the Company's policies and procedures?
- Is it consistent with our mission and values?
- Could this action adversely affect the Company's reputation?
- If this action were publicized, what would a newspaper headline say about it?

If you are in doubt about how to handle a situation, you should contact your manager, the Corporate Compliance Department or the Legal Department.

REPORTING

Every employee has the responsibility to ask questions, seek guidance, report suspected violations and express concerns regarding enforcement of the Code, the law and other Spark policies. To assist with these responsibilities, Spark has established procedures for reporting and handling compliance complaints.

Any employee who knows or believes that any other employee or agent of the Company has engaged or is engaging in Company-related conduct that violates applicable law, the Code or Company policy should report such information to their manager, Human Resources, the Legal Department, the Corporate Compliance Department or anonymously by submitting such concerns in writing to the Company's head of Corporate Compliance via the web portal: compliance.sparktx.com or the Compliance and Business Ethics Helpline 1-844-826-8149, where you can leave a recorded message about any violation or suspected violation of the Code. For assistance outside of the United States, please go to compliance.sparktx.com.

While we prefer that you identify yourself when reporting violations so that we may follow up with you as necessary for additional information, you may leave messages anonymously.

Q: WHAT TYPES OF MATTERS SHOULD BE REPORTED?

A: You should report good faith concerns about suspected compliance issues or misconduct. These complaints and reports may relate to questionable financial or accounting practices, healthcare regulation compliance (including compliance with health authority regulations and Good Manufacturing Practices, Good Clinical Practices and Good Laboratory Practices), or other misconduct that is inconsistent with Spark's high standards of integrity and ethics, the Code, Spark's policies, values or applicable laws and regulations.

INFORMATIONAL RESOURCES FOR REPORTING VIOLATIONS

There are many resources available if you have a question or concern about the topics discussed in the Code, compliance issues or need to report a suspected violation.

These resources include:

RESOURCE	CONTACT INFORMATION
Your Manager	Refer to Spark Company Directory
The Human Resources Department	Chief Human Resources Officer, Spark
The Legal Department	Chief Legal Officer, Spark
The Corporate Compliance Department	Head of Corporate Compliance, Spark
Web Portal	compliance.sparktx.com
	Within the United States: 1-844-826-8149
Compliance and Business Ethics Helpline	Outside of the United States: Please visit compliance.sparktx.com for international helpline numbers.

Additional contact details for reporting a concern directly to an individual or specific department are available on the Spark intranet at the respective department homepages.

INVESTIGATIONS PROCESS

After receiving a report of a suspected compliance violation, Spark promptly will take all appropriate actions necessary to investigate the report. The Chief Legal Officer, head of Corporate Compliance and/or their designee(s) investigate alleged violations of the Code.

Employees are expected to cooperate fully with any inquiry or investigation by the Company regarding an alleged violation of the Code, the law and/or other Spark policies, and maintain confidentiality of such inquiry or investigation. Failure to cooperate with any such inquiry or investigation may result in disciplinary action, up to and including termination of employment.

Employees sometimes request information about the outcome of a Company investigation, particularly if they reported the conduct at issue or were interviewed in connection with an investigation. To protect confidentiality, the privacy of those involved and to comply with applicable laws, the Company may not disclose the status of its investigations or findings of those investigations. Please know, however, that all Company investigations will be performed thoroughly and promptly.

CONFIDENTIALITY

Spark strives to create an environment where employees feel secure in raising complaints of improper conduct. Confidentiality will be maintained to the fullest extent possible. However, there may be certain instances where it is not possible to keep your identity confidential due to the nature of the investigation and/or certain legal requirements. Employees in the United States who are concerned about confidentiality may consider anonymously raising their concerns via the web portal at compliance.sparktx.com or the Compliance and Business Ethics Helpline 1-844-826-8149 where you can leave a recorded message. For assistance outside of the United States, please go to compliance.sparktx.com.

PROTECTION AGAINST RETALIATION

Spark strictly prohibits any form of retaliation against employees who, in good faith, report or provide information in an investigation about any conduct or activity that may violate the Code, Company policies, any law or regulation applicable to the Company or any other suspected improper, unethical or illegal conduct or activities by anyone at the Company.

Examples of prohibited retaliation include, but are not limited to:

- Harassment (unwelcome and offensive comments or actions);
- Denial of benefits;
- Demotion;
- Threats;
- Suspension; or
- Termination.

If you believe that you have been, or another employee has been, retaliated against in violation of the Code, you should report the retaliation to the head of Human Resources, head of Corporate Compliance or the Chief Legal Officer.

Employees are expected, as part of the ethical standards required by the Code, to act responsibly in making complaints and/or reporting potential violations of the Code. Making a complaint or report in bad faith is itself a violation of the Code. Any employee who makes a complaint or report in bad faith will be subject to appropriate disciplinary action. Bad faith means making a report based on fabricated or noncredible information for the primary purpose of discrediting or embarrassing the employee against whom the report is made.

Q: MY MANAGER ASKED THAT I DO SOMETHING OUTSIDE OF SPARK POLICIES AND PROCEDURES THAT I BELIEVE COULD HARM THE COMPANY, BUT I AM AFRAID TO REPORT IT BECAUSE I WORRY THE MANAGER WILL FIRE ME IF THEY FIND OUT. WHAT SHOULD I DO?

A: If you have a good faith basis for reporting misconduct, you should report the violation through any of the resources noted above without fear of retaliation. The Company will take action to protect you from retaliation.

Spark prohibits retaliation and will take disciplinary action against any employee, regardless of level, who engages in such conduct.

DISCIPLINARY ACTION

Failure to comply with the standards outlined in the Code will result in disciplinary action, up to and including termination of employment. Moreover, any manager who directs or approves of any conduct in violation of the Code, who has knowledge of such conduct and does not immediately report it or who fails to detect or correct a violation, will be subject to disciplinary action, up to and including termination of employment.

Several factors may be considered in determining the appropriate disciplinary action including, but not limited to, the nature and severity of the violation; what the individual knew or should have known; the individual's direct or indirect exposure to the requirements of relevant laws, rules and policies; disciplinary action taken for similar violations; and other aggravating or mitigating factors and circumstances. The relevant Department Manager is responsible for implementing any disciplinary or corrective action, in collaboration with Human Resources, Legal and Corporate Compliance, as appropriate.

Certain violations of the Code may require the Company to refer the matter to the appropriate governmental or regulatory authorities for investigation or prosecution.

REQUIRED CERTIFICATIONS

After initial hire or first receipt of the Code, all employees must certify that they have read and understand the Code and that they will comply with the Code and any training received relative to the Code at all times.

The certification must be signed annually as a condition of continuing employment.

SUSTAINABILITY APPROACH

Since our founding, Spark has worked to create the path to bring gene therapies to patients and families, not only through our scientific efforts, but through our corporate social responsibility efforts as well. As part of the Roche Group, we share a commitment to creating sustainable value for all our stakeholders through improving lives now and in the future. Spark seeks to unlock the power of gene therapy to accelerate healthcare transformation while providing a rewarding workplace, being a trustworthy business partner, and supporting our patients and local communities. In partnership with our stakeholders, Spark strives to:

- Manage and grow our business responsibly;
- Value the dignity and protect the safety of our employees;
- Understand the impact of our business practices on the environment and reduce identified risks;
- Support and respect the protection of human rights as an integral part of our business, including by assessing risks, increasing awareness and fostering due diligence;
- Not be complicit in human rights abuses;
- Ensure that our supply chain reflects Spark's values and respect for human rights and the environment;
- Engage in philanthropic initiatives focused on the patient communities we serve, the scientific community we collaborate with and Philadelphia and other communities where we work; and
- Commit to transparency in our philanthropic giving and interactions with patient groups, healthcare professionals and healthcare organizations.

These principles are reflected in the Code and embedded in the way we conduct our daily business.



Our standards for
the marketplace

COMPLIANCE WITH LAWS, RULES AND REGULATIONS WORLDWIDE

Our industry is highly regulated, and regulation affects virtually every functional area of Spark's business.

Spark and all of its employees are required to comply with all laws, rules and regulations that apply to the operations of the Company including, but not limited to, laws, rules and regulations that govern the development, manufacturing, marketing, promotion and distribution of products; securities laws; antitrust laws; privacy laws; employment laws; and state and federal laws, including those relating to duties owed by corporate officers.

In certain aspects of our business activities, we have made further commitments to comply with regulatory guidance and generally accepted industry codes of conduct. Because Spark operates outside of the United States, the laws and regulatory requirements of more than one country may apply to certain activities. Therefore, pursuant to Spark policy, relevant Roche affiliate review is required for certain activities conducted outside the United States or with specific groups (e.g., healthcare professionals, patients, patient advocacy groups) residing or practicing outside the United States to ensure compliance with local laws and regulations. In the event local laws and regulatory requirements differ from the Code or other Spark policy, the stricter requirements generally apply.

The actions of each employee must reflect the Company's commitment to honest, ethical and professional interactions with the public and our customers, suppliers, purchasers, vendors, employees and co-workers. We do not compromise our standards for any reason, including to achieve any goal. Although adherence to legal requirements is required, such adherence is itself not always a reflection of ethical behavior.

We expect our independent contractors, consultants and other third parties working with Spark to comply with the principles set forth in the Code, as well as with the applicable laws and regulations of the countries in which they operate and with internationally accepted best practice standards.

If you have questions about which laws, regulations, policies or standards apply to your role and activities, please consult with your manager or the Legal or Corporate Compliance Departments.

LAWS AND REGULATIONS GOVERNING THE MANUFACTURE AND SALE OF PHARMACEUTICAL PRODUCTS

Spark's employees or others acting on our behalf may only provide information on our marketed or investigational products if they are authorized by Spark to do so using Spark-approved materials and messages. Spark uses many communication channels when delivering information about its products.

Examples of these channels include: direct contact with healthcare professionals by Company representatives, scientific interactions with healthcare professionals by medical science liaisons, the internet, websites, social media outlets, conferences and congresses, patient advocacy, journal advertisements and industry meetings, among others.

Regardless of the communication channel, Spark is committed to high standards of ethics and integrity in the communication of information about our products. The labeling and advertising of our approved products is highly regulated. All materials and communications about marketed Company products must be:

- Accurate and not misleading;
- Balanced, current and substantiated;
- Consistent with and not contrary to approved product labeling;
- Approved through the appropriate Spark review process before use; and
- Compliant with local medical, legal and regulatory standards and obligations.

Spark employees and anyone acting on behalf of Spark are prohibited from unlawfully promoting products prior to approval or for a use that has not been approved by the appropriate regulatory authorities. For materials and communications intended for use with audiences outside the United States, relevant Roche affiliate review is also required.

Q: CAN I CUSTOMIZE SOME OF SPARK'S PROMOTIONAL MATERIALS TO TAILOR THEM TO A SPECIFIC PHYSICIAN OR BUSINESS MEETING?

A: No. Spark's promotional materials and programs are developed, reviewed and approved through a rigorous process that helps to ensure compliance with laws and regulations. You are not permitted to alter, amend or expand approved materials and you may not create your own.

Q: I WOULD LIKE TO UPDATE A PROMOTIONAL PIECE FOR AN UPCOMING MEETING. HOW CAN I DO THIS?

A: You should submit your request to update the promotional piece to Spark's promotional review team. If your request is approved, the promotional review team will revise the promotional piece and notify you of their approval.

INTERACTIONS WITH HEALTHCARE PROFESSIONALS AND HEALTHCARE ORGANIZATIONS

Spark is committed to high standards of integrity and compliance with applicable laws and regulations in every aspect of its relationships with healthcare professionals ("HCPs") and healthcare organizations ("HCOs"). Spark interacts with HCPs and HCOs in many ways, including through medical information communications, promotional activities, clinical research and educational efforts. Interactions with HCPs and HCOs are highly regulated around the globe to ensure that their independence from untoward industry influence is respected and maintained.

Spark recognizes the importance of providing HCPs and HCOs with the timely and accurate information needed to help them make fully informed decisions in support of good patient care. All interactions and communications undertaken by or on behalf of Spark with HCPs and HCOs must be conducted in a manner that is fair and balanced, scientifically rigorous, accurate, not misleading and compliant with all applicable medical, legal and regulatory standards. All employees must understand and comply with Spark's policies regarding appropriate interactions and communications with HCPs and HCOs. It is never acceptable to improperly influence a patient treatment or testing decision by an HCP or HCO.

You are required to collect and report any direct or indirect transfers of value, including payments or services provided to HCPs and HCOs, consistent with applicable laws and regulations.

“HCPs” CAN INCLUDE, BUT ARE NOT LIMITED TO, PHYSICIANS, PHDs, RESIDENTS, FELLOWS, PHYSICIAN ASSISTANTS, NURSES, PHARMACISTS, OTHER PRESCRIBERS AND HEALTHCARE ADMINISTRATORS WHO RECOMMEND, PURCHASE OR INFLUENCE HEALTHCARE DELIVERY.

EXAMPLES OF HCOs CAN INCLUDE, BUT ARE NOT LIMITED TO, HOSPITALS, MEDICAL UNIVERSITIES, PHARMACIES, HEALTH CLINICS, SURGICAL CENTERS, OUTPATIENT FACILITIES, OR ANY OTHER ORGANIZATION THAT IN THE COURSE OF ITS ACTIVITIES MAY PRESCRIBE, RECOMMEND, PURCHASE, SUPPLY, OR ADMINISTER A PHARMACEUTICAL PRODUCT, THERAPY, OR MEDICAL DEVICE.

COMPETITION AND ANTITRUST LAWS

Spark believes in creating competitive advantage only through lawful and ethical means. Spark is committed to complying with competition and antitrust laws applicable in the countries where it operates. These laws are complex, but are intended to protect and support free enterprise, prevent monopolization and restraints on trade, abuses of market position and unfair trade practices.

At a minimum, competition and antitrust laws prohibit written or verbal agreements between competitors that fix or affect prices, terms or conditions of sale or fair competition, or agree to divide territories between competitors. It is your responsibility to be aware of these laws, as violations of antitrust and competition laws can carry severe penalties for both Spark and its employees, officers and agents.

Q: MY COUSIN GOT A PROMOTION AT ONE OF SPARK'S COMPETITORS AND WANTS TO DISCUSS PRICING STRATEGIES AT OUR FAMILY DINNER. IS THAT OK?

A: No. It does not matter that you are related to the individual or that the discussion occurs outside of the office. You cannot discuss business topics that violate antitrust or competition laws with anyone in any location.

Spark prohibits:

- Discussing confidential information with competitors, which includes, but is not limited to, pricing, costs, sales data or other terms of sale, supply information, or bids and contracts with vendors;
- Discussing or contacting suppliers or customers about actions that may exclude or limit competition from or in the marketplace;
- Entering into written or verbal agreements preventing suppliers or customers from supplying or buying from competitors; and
- Entering into written or verbal agreements with competitors that allocate markets or customers or affect price or other commercial terms.

Any agreement or joint activity with a third party that someone could claim has the effect or intent to reduce competition must be reviewed by the Legal Department.

PARTICIPATION IN TRADE ASSOCIATIONS CAN BE A LEGITIMATE ACTIVITY, BUT IS STILL SUBJECT TO THE SAME RULES AND STANDARDS.

EXERCISE CAUTION DURING DISCUSSIONS WITH COMPETITORS, BECAUSE EVEN WELL-INTENTIONED DISCUSSIONS ON MATTERS OF MUTUAL CONCERN CAN CROSS THE LINE FROM LAWFUL TO UNLAWFUL CONDUCT.

IF A DISCUSSION ABOUT ANY PROHIBITED TOPIC OCCURS, YOU MUST LEAVE THE CONVERSATION IMMEDIATELY AND REPORT THE INCIDENT TO THE HEAD OF CORPORATE COMPLIANCE OR THE CHIEF LEGAL OFFICER AS SOON AS POSSIBLE.

COMPETITIVE INTELLIGENCE GATHERING

Any collection, acceptance, analysis or use of information about competitors must be lawful and ethical.

Spark employees are free to gather intelligence about companies from public sources such as websites, public records, published articles, price bulletins, advertisements, brochures, public presentations, materials disseminated at congresses or other meetings and customer conversations and interactions with individuals in the industry. However, business information about other companies should only be collected and used ethically and in a way that does not violate laws or confidentiality obligations. Particular care should be taken when speaking to customers of other companies to ensure that we do not explicitly or implicitly ask them to impart information that is confidential to the other company. Spark employees must never misrepresent themselves or their affiliation with Spark to gather or attempt to gather competitive intelligence. Spark may not solicit, receive or use confidential information belonging to a competitor from an employee of Spark who used to work for or consult with the competitor.

Spark employees may not engage a third party to conduct unlawful collection of information for use by Spark (for example, by misrepresenting on behalf of whom they are acting or the purpose of seeking the information). When a third party is gathering information for Spark, it is the responsibility of the Spark employee who commissioned the activity to ensure the vendor collects information legally and ethically. What Spark cannot do legally or ethically directly; it cannot do through third parties working on Spark's behalf.

Spark employees may inadvertently receive confidential information, including trade secrets, about another company (e.g., through an email sent in error). The possession or use of such information without authorization could pose risk to the individual and the Company, and Spark employees must inform their manager and seek advice from the Legal Department before using or disclosing another company's confidential information.

Q: A VENDOR PREPARED AN INDUSTRY ANALYSIS THAT MISTAKENLY INCLUDED HIGHLY CONFIDENTIAL INFORMATION ABOUT A COMPETITOR'S BUSINESS. CAN I USE THAT INFORMATION TO DEVELOP SPARK'S STRATEGY?

A: No. You may not accept or use confidential information without appropriate authorization. You should immediately contact your manager and the Legal Department.

INSIDER INFORMATION AND TRADING

As an independent company within the Roche Group, Spark is committed to protecting insider information and preventing insider trading. All Spark employees are prohibited from buying, selling or engaging in any other transaction with respect to securities of Roche or any other company while in possession of insider information. Insider information is defined as non-public information about Roche or its business partners that a reasonable investor would consider important in making an investment decision. Such information includes, for example, financial results and information about possible mergers, acquisitions or divestitures, capital increases, capital market transactions, important licensing agreements and other collaborations as well as results from major clinical trials.

Spark employees who learn about insider information in the performance of their duties, whether intentionally or incidentally, are considered insiders. Non-employees who obtain such insider information can also be considered insiders. Insiders are prohibited from buying, selling or engaging in any other transaction with respect to securities of Roche or any other company while in possession of insider information. In other words, you cannot use non-public information gleaned through your employment to buy or sell securities. Insiders are also prohibited from providing trading recommendations to non-insiders. All employees must also refrain from sharing, tipping or disclosing insider information to others (including family members).

Violations of securities laws are taken very seriously. If you are uncertain about the constraints on your purchase or sale of any securities by virtue of your relationship with Spark, you should consult with the head of Finance, the Chief Legal Officer or the head of Corporate Compliance before making any such purchase or sale.

Q: I JUST BECAME AWARE THROUGH WORK THAT ONE OF SPARK'S BUSINESS PARTNERS IS ON THE VERGE OF A SCIENTIFIC BREAKTHROUGH. THIS INFORMATION IS CONFIDENTIAL AND HAS NOT BEEN DISCLOSED PUBLICLY. CAN I PURCHASE STOCK IN THE BUSINESS PARTNER?

A: No. Neither you nor your family members nor anyone acting on your behalf can purchase stock in the Company's business partner when you are in possession of material, non-public information.

PREVENTING BRIBERY AND CORRUPTION

We must build our business relationships through trust and integrity, not favors and gifts. Spark prohibits employees and anyone acting on Spark's behalf from offering, giving, requesting, accepting or receiving a bribe or kickback. A bribe or kickback may be defined as any money, fee, commission, credit, gift, service, gratuity, thing of value or compensation of any kind that is provided, directly or indirectly, and that has as one of its purposes, the improper obtaining or rewarding of favorable treatment in a business transaction, including influencing prescribing decisions or patterns. A bribe or kickback is considered illegal in all countries in which Spark conducts business. Spark also does not engage in providing payments or other items of value to expedite Spark's business.

Bribes and kickbacks are prohibited regardless of whether they are supported by Spark or the employee's personal funds and resources.

In addition to exposing Spark to severe sanctions, any employee or other person acting on behalf of Spark who engages in such conduct can also face substantial fines and/or imprisonment.

ALL COMPANY EMPLOYEES ARE EXPECTED TO REPORT POTENTIALLY CORRUPT BEHAVIOR. IF YOU SUSPECT POTENTIALLY CORRUPT OR CORRUPT BEHAVIORS, YOU SHOULD IMMEDIATELY DISCUSS IT WITH OR REPORT IT TO:

- Your manager;
- the Human Resources Department;
- the Legal Department;
- the Corporate Compliance Department; or
- the Compliance and Business Ethics Helpline 1-844-826-8149 or compliance.sparktx.com.

COMMERCIAL ENTITIES AND INDIVIDUALS

The United States government as well as many states have enacted laws that penalize conduct related to bribes and kickbacks. In the United States, these laws, typically referred to as the Anti-kickback laws, prohibit anyone from knowingly and willfully offering a monetary reward or any other reward in any form to induce an individual or entity to purchase, arrange for the purchase of, use, recommend or prescribe a product that is reimbursed by a federal or state healthcare program (including Medicare and Medicaid). The law applies to both the party offering the payment or reward and the third party who receives it.

Anti-kickback laws generally apply to the Company's interactions with patients, patient organizations, HCPs and HCOs, such as healthcare institutions, treatment centers, pharmacy or managed care directors or others who are in a position to influence which drugs are used, purchased, recommended or prescribed. All employees must be familiar with, and must comply with, Spark's policies regarding interactions with HCPs and HCOs. No meals, hospitality, payments, grants, gifts, services or anything else of value may be offered to HCPs and HCOs except as permitted by law and in accordance with Spark's policies.

Many other countries have also enacted similar anti-kickback laws and regulations. To ensure compliance with all local laws and regulations, consultation with the relevant Roche affiliate(s) is required for meals, hospitality, payments, grants, gifts, services or anything else of value provided to HCPs or HCOs located or practicing outside the United States, even when interactions or activities with these HCPs occurs within the United States. If there is any doubt as to the propriety of a business courtesy from any individual or entity, please seek guidance from the Company's Corporate Compliance Department or Legal Department.

GIFTS AND ENTERTAINMENT TO U.S. GOVERNMENT OFFICIALS

The federal government, each state and many local jurisdictions have laws that restrict the ability of the Company and its employees or agents to give gifts (i.e., anything of value that personally benefits an individual, such as meals, entertainment, tickets to sporting or theatrical events, golf, travel, lodging, charitable contributions in their name and payment for services) to federal, state or local government officials or employees, and in some cases to their spouses or children. These laws range from absolutely prohibiting such gifts to permitting them as long as there is no intent to influence a specific official decision with the gift.

To ensure the Company is in compliance with these laws, you must obtain approval from the Chief Legal Officer before providing any gift to a federal, state or local government official or employee, or to their spouse or child. As a matter of general policy, Spark does not provide gifts or entertainment to government officials.

NON-U.S. GOVERNMENT OFFICIALS

Many of the countries in which Spark does business have laws that prohibit improper influence of government officials.

The U.S. Foreign Corrupt Practices Act of 1997 ("FCPA"), United Kingdom Bribery Act and other countries' anti-corruption laws apply to and prohibit the provision of business courtesies and other financial arrangements, such as gifts, travel, entertainment, commissions, shares, debt forgiveness or discounts, to non-U.S. government officials, employees and other similar individuals and entities. Moreover, these laws may be applicable even when a payment occurs outside of the recipient's home country or where an intermediary or third party is used to facilitate the transaction or arrangement. The FCPA also makes it illegal to inaccurately record transactions in Spark's books and business records. Spark must comply with the FCPA as well as other applicable anti-corruption and anti-bribery laws.

Spark strictly prohibits the direct or indirect offering, authorizing, promising or making of any payment or gift of anything of value to foreign government officials and public employees (including, but not limited to, employees of state-owned or controlled companies or institutions such as hospitals and universities), candidates for political office and political parties (including party officials) for the purpose of influencing an official act or decision to award or retain business, or to gain an improper business advantage.

These prohibitions are not limited to cash payments but cover anything that has any value to the recipient regardless of the actual cost of the gift or service to Spark. Other gifts provided to non-U.S. government officials or employees must be approved in advance by the Chief Legal Officer.

Spark employees must comply with both the letter and the spirit of these requirements, as well as all relevant country-specific prohibitions.

BE AWARE THAT CUSTOMS IN ONE COUNTRY, INCLUDING GIFT GIVING, MAY NOT BE LAWFUL OR APPROPRIATE ELSEWHERE.

OFTEN TIMES HCPs AND SCIENTISTS ARE EMPLOYEES OF PUBLIC INSTITUTIONS AND THEREFORE MAY BE CONSIDERED GOVERNMENT OFFICIALS.

BRIBES AND KICKBACKS, WHETHER MADE DIRECTLY OR INDIRECTLY, ARE STRICTLY PROHIBITED.

RECEIVING PAYMENTS, GIFTS (E.G., MEALS, ENTERTAINMENT) OR GRATUITIES FROM COMPANY SUPPLIERS AND OTHER BUSINESS PARTNERS

Bribery laws also may be applicable when a Spark employee receives or is offered payments, gifts, or gratuities that might unduly influence the employee's business judgment or practices.

You must review the "Conflicts of Interest" section of the Code, and if offered payments, gifts or other gratuities that might unduly influence the conduct of Spark's business, you should follow the guidelines set forth below. If uncertain, seek guidance from your manager, the Legal Department, or the Corporate Compliance Department.

POLITICAL PROCESS

There are legal restrictions on Spark's ability to support political candidates or engage in political activity.

CONTRIBUTIONS

Contributions by Spark to political candidates, parties and political committees are prohibited under federal and many state campaign finance laws. Employees may not cause the Company to make political contributions, which includes not only monetary contributions from corporate funds but also use of corporate personnel or facilities, without obtaining prior approval from the Legal Department. Spark employees who are not authorized to engage in political or lobbying activities may not undertake any politically related activity or make any loan, donation, contribution or payment to a political party, candidate or political action committee on behalf of the Company, nor should they cause the Company to reimburse any individual who provides such support.

Nothing contained in the Code should prohibit Spark employees from engaging in personal political or advocacy activities as a private citizen, in their name, provided that the action is exclusively on their own accord and is not an indirect means of accomplishing any prohibited act. In addition, employees may not conduct personal political activity on Company time or use Company resources for such purposes.

Q: A FRIEND IS RUNNING FOR LOCAL OFFICE, AND I WOULD LIKE TO HELP THE CAMPAIGN. IS THIS ALLOWED?

A: Yes. Your personal political activities are your own — not Spark's.

Just make sure not to use Company resources including Company time, email, mailing lists, or Spark's name to advocate the campaign.

LOBBYING

Spark's policy is to comply with all applicable laws and regulations relating to lobbying activities. Lobbying activities can include communicating with any member or employee of a legislative branch or other government employee for the purpose of influencing legislation, communicating with certain government officials for the purpose of influencing government action (including a decision regarding the award of a government contract or a decision to add a drug to the state formulary) or engaging in research or other activities to support or prepare for such communications.

No Spark employee may engage in any lobbying activity relating to Spark without prior approval of the Legal Department.

Spark employees who are authorized by the Legal Department to engage in lobbying activities must strictly comply with applicable laws and regulations that restrict or prohibit certain interactions with government officials or that require tracking and reporting of expenditures incurred in furtherance of lobbying activities.

GLOBAL TRADE RESTRICTIONS COMPLIANCE

Spark employees must comply with all applicable customs and trade law restrictions, export control regulations, and economic sanctions rules in the countries in which Spark operates. These restrictions may change as the government evaluates trade and security issues. Spark is committed to fully complying with applicable trade laws and regulations.

Keep in mind that certain products, like software, technology or equipment may be covered under certain trade laws. If your work involves transferring goods or assets outside of the United States, you must familiarize yourself with applicable laws.

Any questions or concerns about trade compliance should be directed to the Legal Department.



Our standards for
the workplace

UNLESS OTHERWISE AGREED TO IN WRITING AND IN ACCORDANCE WITH APPLICABLE LAWS, SPARK EMPLOYEES ARE EMPLOYED BY THE COMPANY ON AN AT-WILL BASIS. AT-WILL EMPLOYMENT GENERALLY MEANS THAT EMPLOYMENT IS NOT GUARANTEED FOR ANY PARTICULAR AMOUNT OF TIME AND BOTH YOU AND THE COMPANY REMAIN FREE TO TERMINATE THE EMPLOYMENT RELATIONSHIP, WITH OR WITHOUT CAUSE, AT ANY TIME, WITH OR WITHOUT NOTICE.

THIS APPLIES TO ALL EMPLOYMENT PRACTICES, INCLUDING RECRUITING, HIRING, PAY, PERFORMANCE REVIEWS, TRAINING AND DEVELOPMENT, PROMOTIONS AND OTHER TERMS AND CONDITIONS OF EMPLOYMENT.

PLEASE DIRECT ANY QUESTIONS TO THE HUMAN RESOURCES DEPARTMENT.

EMPLOYMENT POLICIES

The success of Spark's mission to foster "a world where no life is limited by disease" hinges on our ability to build a culture that unlocks the potential of every employee.

A workforce with wide-ranging perspectives and capabilities fosters innovation and ultimately strengthens Spark and its impact on employees, patients and our communities at large. Spark celebrates and values the unique capabilities of its employees, and actively works to cultivate an environment in which a sense of mutual respect and community is felt by all.

At Spark, an inclusive culture ensures all employees can thrive personally and professionally while contributing fully to the Company's success. Spark is firmly committed to providing equal opportunity and a positive working environment in all aspects of employment, without regard to race, color, ethnicity, ancestry, religion, national origin, sexual orientation, sex, age, physical or mental disability, marital status, pregnancy, child birth or related medical conditions, other medical conditions, military service, veteran status or any other legally-protected status or characteristic under applicable law. For more information, see Spark's Equal Opportunity Policy.

DISCRIMINATION OR HARASSMENT

Spark does not tolerate any form of discrimination or harassment by any person, whether a manager, non-management employee, contractors or third-party vendors. Any form of harassment, discrimination or retaliation related to an individual's race, color, creed, religious belief, gender expression/identity, national origin, age, sexual orientation, marital status, disability, pregnancy, childbirth or related medical conditions, other medical conditions or military service, veteran's status or any other protected trait or status as established by federal, state or local law and Spark policies, is prohibited.

Spark prohibits bullying behavior in the workplace. Bullying is abusive, repeated conduct that may include, but is not limited to, threatening, humiliating, or intimidating behaviors in public or private; disruption or interference with an individual's work performance or that creates an intimidating, offensive, or unprofessional environment; verbal or non-verbal abuse (gestures that can convey threatening messages); or socially or physically excluding or disregarding a person in work-related activities. Spark will not tolerate conduct by any person, whether a manager, non-management employee, contractors or third-party vendors, which is repeated mistreatment of one or more people by one or more perpetrators. The Company encourages its employees to speak out if they believe, in good faith, that an individual's conduct is improper, unprofessional or violative of our mission, vision and values. Managers are reminded that they are responsible for enforcing and abiding by the Code and Spark's Anti-Discrimination and Anti-Harassment Policy. Any form of discrimination or harassment must be reported. The Company takes allegations of discrimination and harassment, including sexual harassment, seriously, and will respond promptly to any complaints of discrimination or harassment. The Company maintains policies setting forth its expectations for non-discrimination and a harassment-free work environment, which also include important information on reporting requirements and methods. Retaliation of any kind will not be tolerated against any employee for making a good faith complaint of discrimination or harassment, including sexual harassment, retaliation or for cooperating in an investigation of a complaint of discrimination or harassment.

Everyone in the Spark community is responsible for ensuring that these policies are complied with, and to ensure that a professional, positive business environment is maintained for all Spark employees, vendors, partners and customers. Conduct that is unprofessional and inappropriate in a business environment, whether or not violative of law, violates the Code and Spark's policies and may subject employees to disciplinary action, up to and including termination of employment. For more information, see Spark's Anti-Discrimination and Anti-Harassment Policy.

HEALTH AND SAFETY

Spark conducts its operations with the highest regard for the health and safety of its employees. Employees are responsible for complying with safety rules and regulations, and for taking necessary precautions to protect themselves and their colleagues, including taking steps to correct unsafe practices and conditions. Employees must report all accidents and work-related injuries to the head of Health and Safety. Security emergencies and theft must be reported to the head of Corporate Security.

Violent acts or threats of violence made by a Spark employee against any other person's life, health, well-being, family or property are prohibited and will not be tolerated. Moreover, weapons are strictly prohibited from Spark facilities, at Spark sponsored events and while acting on behalf of the Company.

Smoking (including vaping) is prohibited in Spark facilities.

DRUG AND ALCOHOL ABUSE

Substance abuse can pose serious health and safety concerns in the Spark workplace. Spark is committed to providing a work environment free of substance abuse for the benefit of its employees and the Company. The use of illegal drugs as classified under federal, state, or local laws, including marijuana, and the abuse of alcohol or the abuse of over-the-counter or prescription drugs are prohibited in the workplace and while on Spark business, regardless of location.

Company personnel shall not manufacture, distribute, dispense, possess, buy, sell or work under the influence of any alcohol, drugs or any substance that interferes with the safe and competent performance of one's job duties. All employees are prohibited from working in Company facilities, operating a Company vehicle or a vehicle subsidized by the Company or conducting Spark business off-site if under the influence of or impaired by alcohol or drugs. On rare occasions, alcohol may be served in connection with a Spark-sponsored function or event and, if served, must be consumed responsibly.

Subject to applicable laws and practices, employees may be subject to drug/alcohol testing if there is a reasonable suspicion of drug or alcohol abuse, after a work-related injury or accident or involvement in a violation of any Environmental Health and Safety policy or procedure.

Employees with personal alcohol or drug problems can request assistance from Spark's confidential Employee Assistance Program.

CONFLICTS OF INTEREST

Conflicts of interest may take many forms. Employees must act in the best interests of the Company. You must refrain from engaging in any activity or having a personal interest that presents a "conflict of interest," or even the appearance of a conflict of interest. A conflict of interest occurs when your personal interest interferes with the interests of the Company. A conflict of interest can arise whenever you, as an employee, take action or have an interest that prevents you from performing your Company duties and responsibilities honestly, objectively and effectively.

OUTSIDE BUSINESS AND OTHER INTERESTS

A conflict of interest can arise if your outside business or other interests affect your objectivity, motivation or performance as a Spark employee. Further, outside interests must not create a risk of disclosure or misuse of Spark non-public information. All employees are responsible for recognizing situations that may appear to compromise their business judgment or that may unduly influence or affect Company business. The following engagements have the potential for a conflict of interest:

- Third-party board memberships (for-profit or non-profit);
- Scientific advisory boards;
- Outside employment or consultancies (paid or unpaid);
- Trade or professional organization representation or committee work;
- Task forces and advisory groups; and
- Patient advocacy groups.

You must disclose and provide details concerning all potential and actual conflicts of interest to your manager prior to engaging in any outside activity where there is or could be a conflict of interest. Managers should consult with Legal as needed to determine whether to approve the outside activity and if additional approvals are required. Some cases will require approvals by Legal, Human Resources and/or senior management in addition to your manager. All full-time employees are required to obtain appropriate approval before accepting an additional job outside of Spark. If outside employment is permitted, you must continue to abide by all confidentiality agreements with Spark.

Before serving on the board for another for-profit company, you are required to obtain appropriate approval from your manager, Legal and possibly others as required by applicable Company guidance. Although involvement in charitable organizations and serving on non-profit boards is encouraged, if it relates to Spark's interests or business or you represent Spark while doing so, you must disclose the activity and, if necessary, obtain the appropriate approval. Referrals of third-party service providers typically do not create a conflict of interest and are permitted provided the Spark employee (1) is not in any way involved in the selection of the provider, negotiation of the terms, or oversight of the work involved and (2) discloses their relationship to or affiliation with the referred party to the appropriate Spark decision-makers. Consult the Conflicts of Interest Policy and the Legal or Corporate Compliance Departments for more information.

SPEAKING ENGAGEMENTS

Conflicts of interest may also arise if an employee is asked to accept a speaking engagement or honoraria. All speaking engagements, both formal and informal, must be approved in advance by your manager. You must also provide notice of your speaking engagement to the Corporate Communications Department in advance of the engagement. In addition, all employees must seek pre-approval through Spark's review process for all materials that reference Spark's activities, programs, people or assets, including speeches, that will be used at a speaking engagement. If the materials will be presented to an audience outside the United States, consultation with the relevant Roche affiliates is required. Employees are not permitted to accept honoraria but may be reimbursed for travel and accommodations directly related to participation in the engagement.

FAMILY MEMBERS AND PERSONAL RELATIONSHIPS

Spark seeks to hire individuals who contribute to the Company's success. However, a potential conflict arises if an employee hires, manages or participates in employment-related decisions regarding a spouse, romantic partner, family member or someone with whom they have had an intimate relationship.

Due to the potential for perceived or actual conflicts resulting from these relationships, the Company generally does not permit the employment of such individuals in the same line of authority.

Employees are required to notify Human Resources of any such existing relationships and any relationships that are created among employees, consultants, contractors or interns. Before hiring or retaining the services of a spouse, romantic partner or family member, as either an employee, consultant, contractor or intern, or initiating any such relationship during your employment, please consult the Policy on Family Members as Employees, Consultants, Contractors, or Interns.

Further, a potential conflict arises if a Spark employee conducts Company business (e.g., via a Company vendor or supplier) with a close friend, spouse, romantic partner, family member or someone with whom they have had an intimate relationship. You should be extremely careful if you are in a position to do business with such individuals. You must disclose to your manager and the Legal Department all such potential conflicts of interest, including if your family member or close friend has an ownership interest or is a manager or executive for a Spark vendor or business partner.

If you are uncertain about any potential conflict of interest, seek guidance from the Legal, Human Resources or Corporate Compliance Departments.

RECEIVING GIFTS AND GRATUITIES

Spark employees should not accept or permit any member of their immediate family to accept payments, gifts, gratuities or any other personal benefits or favors from any customer, supplier or other person doing or seeking to do business with the Company. As a general matter, employees should never accept payments, gifts or gratuities from an HCP or HCO.

For existing customers or suppliers only, Spark employees may accept small, inexpensive gifts, modest meals or modest entertainment from an existing third-party vendor, contractor or supplier of Spark (other than an HCP), provided any such gift, meal or entertainment is not: (a) of more than modest monetary value; (b) a cash equivalent (e.g., gift card); (c) susceptible of being construed as a bribe or kickback; (d) made or received on more than an occasional basis; (e) solicited by a Spark employee; (f) a potential conflict of interest; or (g) in violation of applicable laws, regulations or guidance.

Any gifts that are not considered of modest value should be returned immediately and reported to your manager or through any of the methods outlined in the "Reporting Compliance Concerns" section of the Code.

SITUATIONS TO AVOID:

- Holding a significant position or financial interest in a supplier, vendor or competitor without full disclosure and approval in accordance with the Conflicts of Interest Policy.
- Using business relationships to further personal interests.
- Directing business to third parties in which your family has an interest.
- Giving or receiving gifts, tips, commissions or other personal benefits from businesses with which Spark does business.

CORPORATE OPPORTUNITIES

All employees have a duty to advance the appropriate interests of Spark. Therefore, you may not: (a) take for yourself corporate opportunities that are discovered through the use of Company property, information or position, without first offering such opportunities to the Company; (b) use Company property, information or position for personal gain; or (c) compete with the Company.

PROPER USE OF COMPANY ASSETS

Spark employees use Spark's business assets and systems in order to perform their jobs. Inappropriate use of Spark's assets, including facilities, materials, supplies, time, information, intellectual property, software and other assets owned or leased by the Company, or that are otherwise in the Company's possession, may expose Spark's data and systems to substantial risk.

Spark computers, communications devices/equipment and networks may only be used in accordance with Company policy and may never be used to access, receive or transmit material that is illegal, inappropriate or otherwise violates Spark's policies.

All Company-provided computers and personal devices and equipment that employees are permitted to use for business purposes including, but not limited to, laptops, computer tablets (e.g., smartphones, iPads) and mobile telephones, should be password protected and properly secured. No software that is improperly licensed or unlawfully acquired may be introduced into a Company computer or communication device. Further, no software of any kind may be introduced into Company-provided computers and communication devices/equipment without the advance approval of the Spark IT Department.

While Company equipment is intended to be used only for Company business, it is recognized that Spark employees may occasionally use Spark computers and email for incidental personal matters. This use should be reasonable and kept to a minimum. Keep in mind that you have no expectation of privacy with regard to any Company material (including emails or text messages) that you create, view, access, receive or store on Spark systems or networks. The Company's business records (including email and computer records) may become subject to internal review and/or public disclosure in the course of internal investigations, internal audits, litigation or government investigations.

Employees are prohibited from using Spark's technology assets in any way that may be disruptive, offensive or harmful to others including, but not limited to, the downloading, display or transmission of profanity, vulgarity, material with a sexual content or any other material that would violate the Code or Spark's policies or be construed as offensive, harassing or disrespectful to other colleagues (e.g., racial or ethnic slurs, sexual comments or images). This section is not intended to interfere with employee communications or actions that are protected or required by federal, state or local law, including the National Labor Relations Act.

Spark's assets and resources, including its computing, telephone, facsimile and networking resources, should never be used to access or disseminate:

- Sexually explicit content;
- Slanderous or libelous content;
- Content which is threatening or harassing to others; or
- Any information in violation of any laws, the Code or Spark's policies.

Spark's IT systems are the property of Spark. Therefore, you should have no expectation of privacy whatsoever in any message, files, data, document, social media post, conversation, email or any other kind or form of information or communication transmitted to, received or printed from, or stored or recorded on Spark's electronic information and communications systems.

Subject to applicable law, Spark reserves the right to monitor and review all Company-related information and data on any device used to undertake Company business, including: a) logs detailing employees' internet usage; b) electronic mail and messages; and c) computer files. The Company expressly reserves the right to access an employee's Company-provided computer, communications devices/equipment, any other electronic device that accesses Company data, workspaces, offices, desks and any other object brought into the workplace to the fullest extent permissible under law.

Consult Spark's IT Acceptable Use Policy for more information and address questions about whether a particular use is permissible to your manager.

PROTECTION OF INTELLECTUAL PROPERTY AND OTHER CONFIDENTIAL COMPANY INFORMATION

Information, including products, services, ideas and concepts, are significant assets for Spark. These assets provide us with a competitive advantage and must be protected.

Employees are expected to establish, support, maintain and defend Spark's confidential information and intellectual property including, but not limited to, patents, patent applications, trade secrets, trade names, service marks and copyrights, in a manner that protects the highly sensitive nature of the information and the commercial value to the Company. You must also respect the intellectual property of others.

All employees must maintain the confidentiality of sensitive business, technical, scientific, specific employee information (including organization charts and employee directories) or other information entrusted to them by the Company, its customers, suppliers, business partners or collaborators (including product development information such as clinical trial design, patient information, non-clinical or clinical trial results prior to publication, FDA filings and disclosures, lifecycle and investment decisions, and non-public partnerships), except when disclosure is authorized or legally mandated. Confidential information includes all non-public information that might be of use to competitors or harmful to the Company, its customers, suppliers, business partners or collaborators if disclosed. Financial information should, under all circumstances, be considered confidential except where its disclosure is approved by Spark, or when it has been made public in a press release or other public documentation or communication.

You can help Spark protect its confidential information by adhering to the following principles:

- Utilize care when communicating about Spark business in public spaces;
- Beware of requests for information from outsiders, even if the requests appear to be legitimate. Notify Spark's Chief Legal Officer if you receive such a request;
- Dispose of confidential information properly;
- Exercise care when storing and sending confidential information through electronic means;
- Secure all confidential information while working in an unsecure workspace or in an open area;
- Report any incident of improper or accidental disclosure to your manager, the Chief Legal Officer or the head of Corporate Compliance; and
- Do not provide confidential information to third parties, including consumers, potential patients, vendors or contractors, without appropriate authorization and any required confidentiality agreements. Check with your manager or the Chief Legal Officer if you are unsure as to what is required.

The obligation to preserve and protect the confidentiality of Spark's intellectual property and confidential information continues even after employment ends. Additionally, employees must abide by any lawful obligations that they have to a former employer. These obligations may include restrictions on the use and disclosure of confidential information, restrictions on the solicitation of former colleagues to work at the Company and non-competition obligations.

Q: A LOCAL CHARITY WITH WHICH I AM ASSOCIATED WOULD LIKE TO SOLICIT SPARK'S EMPLOYEES FOR DONATIONS. MAY I SEND THE COMPANY EMPLOYEE DIRECTORY TO THIS CHARITY?

A: No. Spark's employee directory contains confidential employee-specific information and cannot be disseminated outside of the Company.

TIP: When in doubt, use the resources referred to in the Code to discuss the issue and ask questions.



Our standards for
company operations

ACCURACY OF BOOKS AND RECORDS AND PUBLIC REPORTS

Employees must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. Accurate information is essential to the Company's ability to meet legal and regulatory obligations.

All Company books, records and accounts will be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The financial statements of the Company must conform to International Financial Reporting Standards (IFRS) and the Company's accounting policies. No undisclosed or unrecorded account or fund should be established for any purpose. No false or misleading entries should be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property should be made without adequate supporting documentation.

It is the policy of the Company to provide full, fair, accurate, timely and understandable disclosure in reports and documents provided to the Roche Group (as a subsidiary).

CONCERNS REGARDING ACCOUNTING OR AUDITING MATTERS

It is your responsibility to report any concerns regarding questionable or fraudulent accounting or auditing matters or complaints regarding accounting, internal accounting controls or auditing matters.

Our Chief Executive Officer and senior leaders in Finance and Accounting have additional responsibilities.

You may report your concerns confidentially, and anonymously if you wish, or submit such concerns or complaints in writing to the Company's Chief Legal Officer and/or head of Corporate Compliance via the web portal compliance.sparktx.com or the Compliance and Business Ethics Helpline 1-844-826-8149, where you can leave a recorded message. See the "Reporting Compliance Concerns" section of the Code. For assistance outside of the United States, please go to compliance.sparktx.com.

RECORDS RETENTION

Company records must be maintained, stored and, when appropriate, destroyed in accordance with industry best practices, and in compliance with Company policy and applicable laws and regulations. Under certain circumstances, such as litigation or governmental agency requests, the Company may be required to preserve documents and information beyond their normal retention period. Never create, alter or destroy records or documents for the purpose of impeding the efforts of any investigation, litigation or government or regulatory agency investigation.

All Spark employees are expected to be familiar with the specific document retention requirements as relevant to the nature of their business activities. If a question arises as to your obligations, please contact the Legal Department.

PRIVACY

While privacy obligations differ from country to country, it is important to note that many countries have adopted laws to protect personal information that is gathered from various sources, including patients, clinical trial subjects, customers, healthcare providers and employees. Spark is committed to protecting the privacy and integrity of personal information (including personal health information) that comes into its possession.

You can help protect the privacy of personal information by adhering to these principles:

- Follow all Company policies and procedures for handling and destroying personal information;
- Comply with all applicable laws and regulations when collecting, using and destroying personal information;
- Collect the minimum amount of information necessary to achieve the business purpose;
- Never seek, obtain, receive or view personal health information about specific patients from healthcare professionals or patients;
- Store personal information for only so long as is necessary to complete the business objective;
- Share information only with individuals who have a legitimate need for the information and who agree to keep the information secure; and
- Report any incident of improper or accidental disclosure to your manager, the Chief Legal Officer or the head of Corporate Compliance.

RESEARCH AND DEVELOPMENT

Spark is committed to conducting its research and development operations in accordance with all applicable laws and regulations, as well as recognized guidelines such as the Good Laboratory Practices, Good Clinical Practices and Good Manufacturing Practices.

All Spark employees are expected to protect the integrity of the Company's research and development process by ensuring that all research including, but not limited to, non-clinical and clinical development, is conducted according to applicable laws and regulations and to the highest ethical, medical and scientific standards.

Spark is committed to providing a high degree of transparency relative to the research that it conducts and sponsors, as well as the results and outcomes of such research. The Company registers information about the clinical trials that it conducts and sponsors on publicly available websites in accordance with United States and foreign laws.

MONITORING THE SAFETY, PERFORMANCE AND QUALITY OF PRODUCTS

Spark is committed to assuring that our products have and maintain an acceptable risk-to-benefit profile when used in accordance with the product labeling and good medical practice. The Company performs preclinical and clinical testing to identify the safety and tolerability profile of our products and, if approved for use, we will continuously monitor our products through the use of post-marketing surveillance and spontaneous reports from prescribers and consumers.

All Spark employees, third-party consultants, service providers and contractors, engaged by Spark to act on its behalf, must immediately report any Safety Information (e.g., adverse drug experience) and/or product complaints that they become aware of that could be associated with a Spark product **WITHIN 24 HOURS**. Also, suspected product counterfeiting of or tampering with Spark products must be reported immediately. For more information, refer to **Spark's Safety Information and Product Complaint Reporting Policy**.

All Safety Information and Product Complaints must be reported **WITHIN 24 HOURS**. We are all responsible! Safety Information and Product Complaint Reporting Contacts:

- Call in US: 1-855-SPARKTX (1-855-772-7589)
- Website: <https://aepqc.sparktx.com/>

While all biotechnology products have possible side effects, Spark is committed to working with regulators to provide HCPs and HCOs, as well as patients and their caregivers, with accurate and current prescribing information for our products. Spark has a responsibility to track and report safety information and product complaints to government authorities and is committed to doing so as required.

TREATMENT OF ANIMALS

Whenever possible, Spark is committed to the development and use of scientifically validated alternative testing methods that do not utilize animals. The Company works with regulatory authorities to increase the recognition and acceptance of alternative models that will not compromise patient safety or the effectiveness of medicines under development.

In those circumstances when it is necessary to use animals to conduct vital research, Spark acknowledges its responsibility to ensure that animals included in studies conducted on its behalf are treated with respect and with a high level of humane and ethical concern.

ENVIRONMENTAL COMPLIANCE

U.S. federal law, as well as other international laws, imposes criminal liability on any person or company that contaminates the environment with any hazardous substance that could cause injury to the community or environment. Violation of environmental laws can involve monetary fines and imprisonment. We expect employees to comply with all applicable environmental laws.

It is our policy to conduct our business in an environmentally responsible way that minimizes environmental impacts. We are committed to minimizing and, if practicable, eliminating the use of any substance or material that may cause environmental damage; reducing waste generation and disposing of all waste through safe and responsible methods; minimizing environmental risks by employing safe technologies and operating procedures; and being prepared to respond appropriately to accidents and emergencies.

Spark also works to manage the environmental impact of its business, to mitigate or reduce identified environmental impacts and to act in accordance with applicable environmental laws.

SOCIAL MEDIA

“Social media” include various modes of digitally publishing information and content online including, but not limited to, websites and applications for social networking like Facebook, Instagram, YouTube, micro-blogging sites such as X (formerly Twitter) and online discussion forums (e.g., Google Groups).

Social media has become embedded within our society as a modern form of communication. As such, employees use social media in a number of ways in their personal lives. Be mindful that social media posts may be representative of Spark if the company name, logo, investigational assets or marketed products are referenced directly or indirectly.

The below table provides guidance when discussing Spark investigational assets or marketed products on personal social media channels.

SOCIAL MEDIA INTERACTION	INVESTIGATIONAL ASSETS	MARKETED PRODUCTS	NO INVESTIGATIONAL ASSETS OR MARKETED PRODUCTS
Post	No	No	Yes
Comment	No	No	Yes
Like	Yes*	Yes*	Yes
Share or Link	Yes, but only if the post you are sharing is on a Spark corporate social media account.*	No	Yes

* You may not add additional commentary unless the Company provides an approved comment.

The following principles should be followed when engaging in social media activity related to Spark:

- Report Safety Information, including Adverse Events and Product Complaints, consistent with Spark Policy;
- Follow all Company policies and guidelines;
- Be responsible and use good judgment;
- Protect confidential information and Company assets;
- Do not post anything that would violate Spark's policies against unlawful harassment, discrimination and retaliation;
- Caution is always taken when posting information publicly. If you have any doubts about the potential consequences of your decision to post certain content, ask the Corporate Communications or Legal Department.

See Spark's Social Media Policy for more information.

Q: CAN I POST ON A PERSONAL SOCIAL MEDIA ACCOUNT THAT A CLINICAL TRIAL IS ENROLLING?

A: No. Posting about investigational assets on a personal social media account is prohibited.

MEDIA OR OTHER PUBLIC INQUIRIES

Spark is committed to disclosing accurate information to the media and other members of the public. This may also include requests from vendors or other third parties that Spark works with or hires for testimonials or other public statements. Employees are not authorized to answer any questions or requests for information, whether formal or informal, from the media, external third parties or any other public entity, including vendors. Please contact your manager and Spark's:

- Corporate Communications and Community Engagement Department for media, third party and other public inquiries or for requests relating to charitable contributions; or
- Patient Advocacy Department for inquiries from patient advocacy groups.

If you are unsure about how to respond to a particular inquiry, contact the Legal Department.

WAIVERS AND AMENDMENTS

The provisions of the Code of Conduct may only be modified by the Chief Executive Officer in consultation with the Chief Legal Officer. No other employee has the right to amend or waive any provisions of the Code.

COOPERATING WITH GOVERNMENT INVESTIGATIONS

Spark will cooperate with all government investigations, inquiries, requests for information or facility visits. Employees must immediately notify the Chief Legal Officer and head of Corporate Compliance if they are contacted by any U.S. or non-U.S. government authority.

The Company will distribute the Code to all employees of the Company. Each employee will be required to certify that they have received, read and understood the Code and will comply with its terms.

The Company reserves the right to amend, alter or terminate the Code at any time for any reason. The most current version of the Code can be obtained from the head of Corporate Compliance, the Chief Legal Officer or the Company's website sparktx.com. Employees are expected to familiarize themselves with any revisions to the Code.

The Code is not an employment contract between the Company and any of its employees.