



# BeiGene Code of Conduct

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## A Message from Our Founders

### Dear BeiGene team,

Not long ago, we set out to build a fully-integrated, global biotechnology company committed to innovation in drug development and improving patient access to medicines. As we continue to grow our organization, it is critical that we formally reinforce high global standards for how we conduct our business activities and interact with each other and our external stakeholders.

Our Code of Conduct (the “Code”) helps us to achieve those standards by providing common rules, principles, and expectations for behavior for our board of directors and all Company employees – regardless of role, level, or location. By doing so, the Code not only helps us fulfill our ethical and legal obligations wherever we operate, but also earn and maintain the trust of our fellow colleagues, customers, suppliers, business partners, government regulators, and most importantly, the patients we serve.

Every day at BeiGene, each of us is responsible for upholding the Code and practicing the Company Values reflected in it, especially those relating to patient-centricity, honesty, integrity, respect, open communication, quality, and compliance. While working in today’s increasingly complex and fast-paced business environment can present unique challenges, we must never waver in our commitment to the principles embodied in the Code, each other and our stakeholders.

Please take time to review the Code and familiarize yourself with its contents so that you may refer to it whenever you have a question. Much of the Code’s rules and principles reflect practical common sense to help you in your decision-making process. Nonetheless, if you are unsure about the right course of action or if you have concerns about activities or behaviors that you believe may be inconsistent with the Code, we encourage you to consult with the many resources contained herein for guidance.

Through our shared commitment to the Code, we lay the foundation for a culture of lasting integrity and excellence at BeiGene. None of this is possible without all your efforts, and we are honored each day to work with such an incredible team.

Kind regards,



**John Oyler**

Co-Founder,  
Chairman and CEO



**Xiaodong Wang, Ph.D.**

Chairman of the  
Scientific Advisory Board  
& Co-Founder

# Who we are

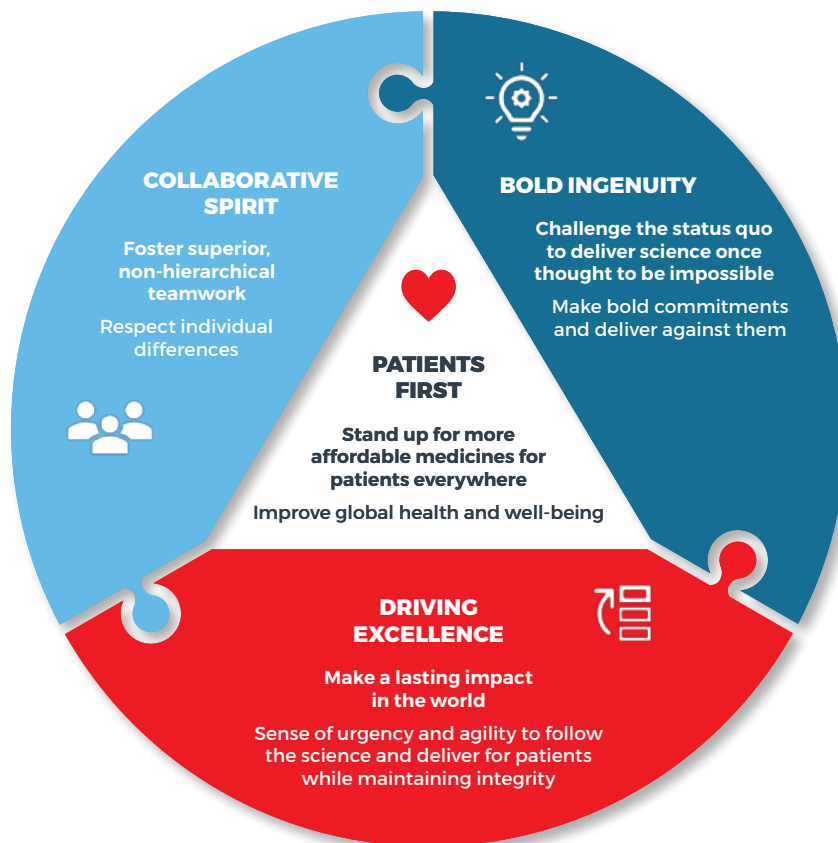
## Vision

Transform the biotechnology industry, creating impactful medicines that will be affordable and accessible to far more cancer patients around the world.

## Mission

Build the first next-generation biotechnology company – one that expands the highest quality therapies to billions more people – through courage, persistent innovation, and challenging the status quo.

## Values



## Behavior

How we get things done is just as important as what we accomplish – we operate with an unwavering commitment to compliance, ethics, and integrity, and always treat fellow colleagues with respect and dignity



# A Culture of Quality and Excellence

Although we are a global organization that thrives on diversity, we share common BeiGene values through our Code.

## Purpose and Scope of the Code

At BeiGene, Ltd., we are passionate about our people, science, and the communities we serve. As we expand our global organization, our goal is to be recognized for our innovations in cancer research and drug development, talented employees, exceptional therapies, and strong culture. To that end, we are committed to maintaining the highest standards of quality, compliance, and ethical business conduct in all of our activities, both internal and external.

**Although we are a global organization that thrives on diversity, we share common BeiGene values through our Code.**

The Code embodies our commitment to ethical business practices in all our interactions with the healthcare community, patients, suppliers, business partners, government regulators, shareholders, and each other. Integrity is more than complying with the law. It reflects who we are as a company and as individuals, and it serves as a driving force in how we operate. Our commitment to doing what is right is a shared responsibility of all employees.

The Code applies to all employees, Officers and Directors of BeiGene, Ltd. and its subsidiaries worldwide (collectively, "BeiGene," "Company," "Company Personnel," "you," "we," "us" or "our").

Company Personnel who engage third party contractors, vendors and consultants on behalf of the Company must ensure that they are made aware of and support the principles and requirements set forth in the Code.

## Our Responsibilities

We are each expected to read and understand the Code and its application to our role and responsibilities at the Company, and to seek guidance and report concerns when necessary. We are also responsible for ensuring our personal decisions and actions comply with the Code in letter and spirit, regardless of the location or nature of our work.

Additionally, managers and supervisors are responsible for fostering an environment where Company Personnel are encouraged to ask questions and raise concerns without hesitation or fear of retaliation.

**Acting with integrity and doing what is right may not always be easy, but we must strive to be better if we want to achieve our potential as a leading global biopharmaceutical company.**



The Code is designed to provide an overview of common topics relating to our operations and to set standards that promote compliance with many of the laws affecting our business. The Code is not intended to address every situation that may occur.

As such, we must use good judgment, always bearing in mind our commitment to putting patients first, and refer to applicable Company policies, procedures and other Company resources if further guidance is needed.



The Legal and Compliance Department is charged with administration of the Code, and the Board of Directors and our executive management team are responsible for overseeing its implementation. However, all of us are accountable for:

- Acting with honesty and integrity when representing the Company;
- Conducting Company business in compliance with applicable legal and regulatory requirements;
- Supporting the Company's Quality Management System and related policies and procedures for Good Manufacturing Practices (GMP), Good Distribution Practices (GDP), Good Clinical Practices (GCP), Good Pharmacovigilance Practices (GPV), Good Laboratory Practices (GLP) and other internationally recognized quality standards;

- Familiarizing ourselves with and adhering to Company policies and procedures relating to our activities;
- Treating patients, customers, partners, suppliers and other Company Personnel with respect, honesty and integrity;
- Avoiding situations where our personal interests are, or appear to be, in conflict with Company interests;
- Protecting Company proprietary information, assets and resources, as well as those of our customers, vendors and collaboration partners;
- Preserving the confidentiality of the Company's non-public information;
- Using the Company's assets responsibly; and
- Reporting in good faith any suspected violation of applicable laws and regulations, the Code or Company policies and procedures in accordance with the reporting procedures provided in the Code.

**When faced with a challenging situation, ask yourself:**



- Is it permitted by applicable laws and regulations?
- Is it consistent with the letter and spirit of the Code and other Company policies and procedures?
- Would I be comfortable if my actions were disclosed to the media?

### Seeking Guidance and Reporting Concerns

BeiGene encourages a culture of open-door communication. This means that managers are here to address concerns, listen to suggestions about ways to improve the workplace and help find solutions. It also means that we should feel comfortable seeking guidance, raising concerns or making reports about suspected misconduct.

Raising questions and reporting concerns not only helps the Company address potential problems before they occur, but also supports the refinement of our policies and training in potentially misunderstood areas.

Your most immediate resource for any matter related to the Code is your manager. However, you may also seek guidance or report a concern to any other Company supervisor, Executive Committee member, the Human Resources Department, the Legal and Compliance Department, or the BeiGene Legal & Compliance Helpline. The BeiGene Legal & Compliance Helpline allows for anonymous reporting (where allowed by applicable law) by phone or web portal and is available 24 hours a day, 365 days a year at: [BeiGene.Ethicspoint.com](https://www.beigene.com/ethicspoint).

For more information about reporting suspected misconduct or any compliance concerns, please refer to BeiGene's Reporting Misconduct Policy.



**Our commitment to integrity requires us to report any suspected misconduct using the reporting procedures provided in the Code.**

### Confidentiality

BeiGene strives to create an environment where employees feel secure in raising concerns. Confidentiality will be maintained to the fullest extent possible and information will be shared only with those who need to address or investigate the matter. Should you identify yourself, every reasonable effort will be taken to keep your identity confidential. However, there may be circumstances where it is not possible to keep your identity confidential due to the nature of the investigation and/or legal requirements.



### Investigative Process

BeiGene takes violations of applicable laws and regulations, the Code, and Company policies and procedures seriously. BeiGene will promptly and thoroughly investigate all reports of suspected misconduct. Company Personnel are expected to cooperate fully with any investigation.

### Non-Retaliation

BeiGene prohibits any form of retaliation against anyone who, in good faith, reports a concern or provides information in an investigation. Examples of retaliation include harassment (unwelcome and offensive comments or actions); reduction in compensation; demotion; threats; suspension; or termination. Reports of suspected retaliation should be made promptly to the Legal and Compliance Department.



### If I report suspected misconduct, will I be kept informed of any actions taken by the Company?



We recognize that reporting suspected misconduct can be a challenge. Reporters will always receive confirmation that their report has been received and will be reviewed. When appropriate and allowed by applicable law, we will seek to update you on the status of any actions taken by the Company.

### Disciplinary Action

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

It is important to note that some violations of applicable laws and regulations may require the Company to refer the matter to the appropriate governmental or regulatory authorities for investigation or prosecution.

# Integrity in the Marketplace

Our success depends on our ability to earn the trust of our stakeholders—including patients, healthcare professionals, and regulatory authorities.

### **Compliance with Laws and Regulations**

We operate in a highly regulated industry where virtually every area of our operations is subject to numerous laws and regulations. Our success depends on each of us understanding the legal and regulatory requirements that affect our roles, including but not limited to those that govern the research, development, manufacturing, marketing, promotion and distribution of our therapies.

In the event that applicable laws and regulations differ from the Code and/or other Company policies and procedures, the stricter requirements shall apply.

**Our success depends on our ability to earn the trust of our stakeholders, including patients, healthcare professionals and regulatory authorities. While this trust takes time to cultivate, we must be mindful that it can be lost in an instant.**

### **Interactions with Healthcare Professionals**

BeiGene is committed to complying with applicable laws and regulations in all of its interactions with healthcare professionals. Accordingly, none of our interactions with healthcare professionals should ever be intended to improperly influence a healthcare professional's decision to purchase, prescribe, use, or otherwise recommend BeiGene therapies.

For purposes of the Code, a "healthcare professional" is any individual licensed or authorized to prescribe, purchase, dispense, recommend, influence, or arrange

for the purchase, sale, or formulary placement of prescription drug products. Healthcare professionals may include physicians, nurses, nurse practitioners, physician assistants, pharmacists, or health plan administrators.

**All of our interactions with healthcare professionals are intended to advance medical and scientific progress, enhance patient care and, where appropriate, support the safe and effective use of our therapies.**

Any interactions where BeiGene therapies are discussed must be conducted in a manner that is fair and balanced, scientifically rigorous, accurate, truthful and not misleading. Further, interactions focusing on the promotion and advertising of our therapies must be consistent with the prescribing information approved by the relevant regulatory authorities. Under no circumstances may a product be promoted prior to its approval or for a use that has not been approved by the relevant regulatory authorities.



In addition, from time-to-time, we may interact with healthcare professionals for the purposes of obtaining necessary consulting services (e.g., advisory board or speaker), sponsoring travel to attend Company meetings or scientific congresses, participating in meals to discuss Company business, or providing healthcare professionals with educational items for patient or healthcare professional education (e.g., medical textbooks or anatomical models). Whenever we offer something of value to a healthcare professional, we must be vigilant to ensure that such transfers of value are: modest and appropriate by local standards; compliant with local legal and regulatory requirements; and as further discussed in the Code, not perceived as “bribes” or “kickbacks” in return for favorable business treatment.

**Items, activities or gifts for the personal benefit of a healthcare professional, such as tickets to events, sports equipment, jewelry, recreational activities, or gifts of cash or cash-equivalents, such as gift cards, are never acceptable and are strictly prohibited.**

BeiGene has established internal Company policies and procedures to help ensure that all of its interactions with healthcare professionals comply with applicable legal and regulatory requirements.

For further information regarding interactions with healthcare professionals, please refer to the appropriate BeiGene country compliance policies for interactions with healthcare professionals.

### **Interactions with Healthcare Professionals Who May be Considered Government Officials**

Healthcare professionals working at public hospitals or government institutions may be considered “government officials” in which case interactions with such healthcare professionals may be subject to additional anti-bribery and anti-corruption laws and regulations. Always consult with the Legal and Compliance Department before engaging or interacting with healthcare professionals who may be government officials.



For further information regarding interactions with healthcare professionals who may be government officials, please refer to BeiGene anti-bribery policies and procedures and the appropriate country compliance policies for interactions with healthcare professionals.

### **Interactions with the Patient Community**

We always put the best interest of patients first. BeiGene primarily interacts with patients through the conduct of clinical research and, where permitted, supporting patient advocacy and disease awareness. The intent of these activities is to enhance patient education and access to medicines and care.

Where permitted under local laws and regulations, we are committed to ensuring our communications with patients are transparent and that they focus on providing the information patients need to make informed, personal medical decisions. Such communications must be tailored for patient audiences and not healthcare professionals.



We also seek to protect the privacy of every patient. During our business activities, we may encounter or obtain patient personal data. Generally, personal data, also known as personal identifiable information, is any information that relates to an identified or identifiable living individual. Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data. Examples of personal data include date of birth, name, age, gender, home address, phone, or data held by BeiGene or a third-party, which could be a code or subject ID number that uniquely identifies a person.

At BeiGene, we respect Privacy, and everyone in the company worldwide has a role to play in complying with BeiGene privacy policies and procedures and applicable privacy laws, which among other things may require the provision of adequate notice and/or obtaining patient consent before we use patient information for business activities.

We are obligated to securely collect and protect patients' personal data to prevent data privacy breaches. Company Personnel must report any potential misuse or loss of patient personal data to the Privacy Office as soon as it is known or suspected.

All interactions and activities with patients must adhere to applicable laws and regulations, the Code, and Company policies and procedures. Do not assume that data privacy requirements are the same in all countries. Different countries have different requirements.

For further information regarding interactions with the patient community, please refer to BeiGene privacy and data protection policies and procedures.

### **Safety Monitoring and Adverse Event Reporting**

Supporting the health and safety of our patients is a Company-wide responsibility. We take great pride in ensuring our therapies maintain an acceptable risk-to-benefit profile when used in accordance with the approved prescribing information and good medical practice. We perform rigorous testing to characterize the safety and tolerability profile of our therapies and continuously monitor their use through post-marketing surveillance. Adverse events are tracked and reported to regulatory authorities as required by applicable laws and regulations.

**We are committed to a quality culture in which all BeiGene Personnel understand and take ownership of the responsibility for protecting patient safety and the integrity of our therapies.**



While all prescription therapies can have possible side effects, we are vigilant in our efforts to provide regulators, healthcare professionals, patients and their caregivers with accurate and timely information to promote the safe and effective use of our therapies.

As such, you are required to report any suspected patient adverse events that could be associated with one of our therapies to the BeiGene Drug Safety and Pharmacovigilance Department within 24 hours of receipt of such information at: [adverse\\_events@beigene.com](mailto:adverse_events@beigene.com).

For further information regarding adverse event reporting, please refer to the BeiGene Adverse Event and Product Complaint Reporting SOP.

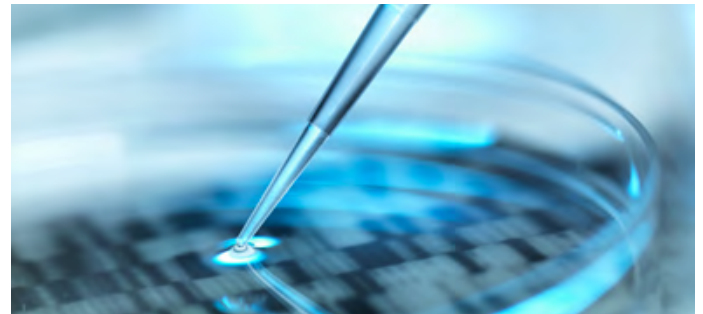
### **Quality, Manufacturing, and Supply Chain**

BeiGene's mission to deliver safe, effective, quality drug products that consistently meet or exceed customer and regulatory requirements is championed through the application of a Quality Management System (QMS) that promotes continuous improvement. We earn and preserve stakeholders' trust by adhering to strict quality control standards in the testing, manufacturing, packaging, storage and distribution of our therapies. We maintain a comprehensive quality assurance and control program to generate awareness, foster a culture of quality, and to support our compliance with applicable laws and regulations and internationally recognized standards for Good Manufacturing Practice (GMP) and Good Distribution Practice (GDP). Furthermore, we require the same quality control standards from our suppliers and business partners.

Additionally, we understand our role in protecting patients from counterfeit or tampered goods. Counterfeit or tampered goods present a danger to patients, our reputation and our trust within the broader healthcare community.

Timely reporting of any potential product complaints or quality concerns is critical to ensuring the integrity of our therapies.

**Achieving our goal of making a difference in patients' lives starts with ensuring the quality of our therapies.**



As such, you are required to report any suspected product complaints or quality concerns that could be associated with one of our therapies to the BeiGene Quality Assurance Department within 24 hours of receipt of such information at: [productcomplaints@beigene.com](mailto:productcomplaints@beigene.com).

For further information regarding the Company's Quality Program or product complaint reporting, please refer to the BeiGene Quality Policy or the BeiGene Handling of Product Complaints SOP, respectively.

## Anti-Bribery and Anti-Corruption

BeiGene has a zero-tolerance policy for bribery and corruption. We respect and comply with all applicable anti-bribery and anti-corruption laws in the countries in which we operate. In addition to exposing the Company to severe sanctions and reputational damage, anyone who violates these laws can be subject to substantial fines and/or criminal prosecution.



Company Personnel are strictly prohibited from offering, giving or facilitating any form of bribe or kickback. A “bribe” or “kickback” is any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind that is provided, directly or indirectly, and has as one of its purposes the improper obtaining or rewarding of favorable treatment in a business transaction.

Business courtesies such as nominal gifts and modest meals may only be offered or provided if appropriate under local standards and consistent with applicable laws and regulations. No business courtesy may, under any circumstances, be offered where a reasonable person might conclude that the courtesy was offered with an expectation or obligation of favorable treatment in a business transaction.

Special requirements apply when interacting with a government official, which is broadly defined and includes any employee of a government agency or department, any employee of an enterprise that is government-owned, operated or controlled, political party representative or official or candidate for political office. Paying, offering, or promising to pay bribes or kickbacks to government officials to secure business is strictly prohibited. Further, many countries prohibit providing anything, regardless of value, to government officials, including but not limited to meals, gifts, travel, lodging and/or compensation for consulting services.

For further information regarding interactions with government officials, please refer to BeiGene Anticorruption Compliance Policy.

**Remember that many anti-bribery and anti-corruption laws apply internationally, so even if an activity may be considered “acceptable” in one country, it can constitute a violation with significant penalties in other countries where BeiGene operates.**

## Anti-competition

Anti-competition laws are designed to protect free enterprise and prevent restraints on trade that could lead to unfair and abusive trade practices. These laws are based on the principle that the public interest and consumers are best served by vigorous competition. Violations of anti-competition laws can carry severe penalties, including criminal prosecution and significant fines. You are not expected to understand the anti-competition laws in the various countries where we operate. However, the Company expects you to consult with the Legal and Compliance Department whenever you have a question relating to these laws or believe a potential business arrangement could violate anti-competition principles.

The following activities are examples of prohibited conduct:

- Discussing confidential information with competitors, including but not limited to information relating to product pricing, cost of goods, sales data, supply information, and bids and contracts with vendors;
- Entering into agreements that prevent suppliers or customers from supplying or buying from competitors; and
- Entering into agreements with competitors for the allocation of markets or customers in contravention of anti-competition and other applicable laws.

The above requirements are not intended to restrict Company Personnel from collecting competitive intelligence about competitors from public sources

such as websites, published articles, price bulletins, advertisements, brochures, public presentations, and other sources of public information. However, such information should only be collected and used in a way that does not violate anti-competition and third-party confidentiality obligations.



## International Trade Controls

Many countries regulate international trade transactions – imports, exports, and international financial transactions – for national security and foreign policy purposes. The Company is committed to complying with all applicable international trade controls in all countries in which it conducts business. Company Personnel whose job functions involve international trade must be knowledgeable of and comply with all applicable trade controls and relevant Company policies and procedures.

For further information regarding international trade controls, please consult with the BeiGene Legal and Compliance Department.

### **Political Activities**

BeiGene complies with all applicable laws and regulations relating to political lobbying activities (“Lobbying”) and political contributions. Lobbying can include communicating with any member or employee of a branch of government for the purpose of influencing legislation, government action or policy. Only Company Personnel or third parties authorized by the BeiGene Government Affairs Department or the Legal and Compliance Department may engage in Lobbying on behalf of BeiGene.

Further, where permitted by applicable law and regulations, only authorized Company Personnel may be involved in making any loan, donation, contribution or payment to a political party, candidate or political action committee on behalf of BeiGene.



Nothing contained in the Code prohibits Company Personnel from engaging in political or advocacy activities in their individual capacity as private citizens, provided that the action is exclusively on their own accord and time and does not use Company resources.

# Responsibilities in the Workplace

BeiGene values a diverse and inclusive workplace, which ultimately improves innovation and strengthens our business.



### **Diversity and Inclusion and Equal Employment Opportunity**

BeiGene values a diverse and inclusive workplace, which ultimately improves innovation and strengthens our business. We welcome diversity. We are firmly committed to providing equal opportunity for all applicants and employees and a positive working environment in all aspects of employment, without regard to race, color, gender, ethnicity, religion, national origin, sexual orientation, age, disability or medical condition or any other legally-protected status or characteristic.

### **Anti-Discrimination and Anti-Harassment**

BeiGene does not tolerate discrimination or harassment in the workplace, including any form of unwelcome or abusive conduct or action, such as verbal, non-verbal, written, electronic or physical conduct that creates an intimidating, hostile or offensive work environment; unreasonably interferes with an individual's work performance; or demeans or shows hostility toward an individual.

We are all accountable for fostering a culture that embraces the contributions of all Company Personnel. As such, everyone should be treated with openness and respect in our interactions with each other and third parties. Even where disagreement or interpersonal conflicts may arise, we are committed to resolving such conflicts in a respectful and professional manner.

Company Personnel are required to report any discrimination or harassment they may witness or experience in the workplace using the [reporting procedures provided in the Code](#). By doing so, you are not only protecting the Company but, more importantly, your fellow colleagues. We do not tolerate any retaliation against Company Personnel for asking questions or making good faith reports of possible violations of the law, the Code or other guidelines.

**While laws on discrimination and harassment vary from country to country, everyone deserves a work environment that is respectful and free from discrimination and harassment. BeiGene's policies on discrimination and harassment apply globally. Consult with the Human Resources Department if you are unsure whether certain conduct is consistent with the Code or Company policy.**

### **Environmental, Health and Safety**

BeiGene complies with environmental, health and safety legal and regulatory requirements (EH&S requirements) not only for the safety and protection of Company Personnel but also for the local communities in which we operate. We are committed to maintaining safe workplaces, reducing the environmental impact of our operations and encouraging environmentally sustainable business practices. This extends to our selection of suppliers and business partners who share our commitment.

Company Personnel are responsible for adhering to EH&S requirements and for taking the necessary precautions to protect themselves and their colleagues. This includes identifying any unsafe workplace practices and conditions and reporting all accidents, work-related injuries, threats/workplace violence, and security emergencies to the local Workplace Services manager or Human Resources representative.

## Substance Abuse

The abuse of illegal drugs, prescription drugs, or alcohol in the workplace poses serious safety and health concerns and has no place at BeiGene.



On Company designated occasions, alcohol may be served in connection with a Company-sponsored function or event and, if consumed, must be done responsibly using good judgment. In addition, Company Personnel should not work in BeiGene facilities, operate a Company vehicle or a vehicle subsidized by the Company, or conduct any other BeiGene business if their ability to work responsibly is impaired by alcohol or drugs.

## Conflicts of Interest

We must always act in the best interests of the Company and refrain from engaging in any personal activity that interferes with the interests of the Company. A conflict of interest may take many forms – personal, social or financial – but is generally characterized by a situation or activity that prevents an individual from performing Company duties and responsibilities honestly, objectively and effectively. Situations that may create even the appearance of a conflict of interest should be avoided.

If you plan to engage, or have already engaged, in an activity that you think may constitute, or may be perceived by others as constituting, a conflict of interest under BeiGene's Code of Conduct and Conflict of Interest Policy, you must disclose the activity to your manager, BeiGene's Legal and Compliance

Department and Human Resources Department at <https://Beigenecoi.ethicspoint.com>. Written approval must be provided by the BeiGene Legal and Compliance Department before starting or continuing to engage in such activity.

It is impossible for the Company to identify every situation that may pose a potential conflict of interest, so it is critical that we apply good judgment and common sense before undertaking activities that could impair our work. While not a complete list, the following activities should always be disclosed and pre-cleared:

- Creating an outside business;
- Hiring, referring or making employment decisions (e.g., compensation, promotion and other terms and conditions of employment) relating to a family member, relative or personal friend;
- Accepting an additional job outside of BeiGene;
- Accepting a speaking engagement relating to your work at BeiGene;
- Serving as a director, officer or substantial shareholder of another company; or
- Conducting Company business with a friend, relative or someone else with whom you have a close personal relationship.

### Would it be a conflict of interest if I work as a consultant for another company during my free time?



Maybe. If the other company is in the same line of business as BeiGene, if BeiGene's resources are used, or the activity negatively affects your job performance or limits your capacity at BeiGene, this would be a conflict of interest. Such outside business activities should be disclosed to and pre-cleared by the Human Resources Department or Legal and Compliance Department.

Action by members of your immediate family, significant others or other persons who live in your household (“family members”) may also present ethical issues to the extent that they involve Company business. For example, acceptance of a gift by a family member from one of our suppliers could create a conflict of interest and result in a Code violation attributable to you. Consequently, in complying with the Code, you should consider not only your own conduct, but also that of family members.

### **Gifts, Gratuities, and Entertainment**

We must always use caution when accepting gifts, meals or entertainment from any vendor, contractor, supplier or other person doing or seeking to do business with the Company.

With manager approval, Company Personnel may accept modest and inexpensive gifts, meals or entertainment from third-party vendors, contractors or suppliers of BeiGene, provided that such gifts, meals or entertainment are not (a) cash or a cash equivalent (e.g., a gift card); (b) susceptible of being construed as a bribe or kickback; (c) made or received on more than an occasional basis; (d) solicited by Company Personnel; (e) a potential conflict of interest; or (f) in violation of applicable laws or regulations. Any gifts inconsistent with these requirements should be returned immediately and reported to your manager or through the reporting procedures provided in the Code.

Moreover, any Company Personnel involved in procurement decisions must ensure that such decisions are based exclusively on normal business considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favors or personal benefit.

### **Corporate Opportunities**

All Company Personnel have a duty to advance the legitimate interests of BeiGene. Therefore, you may not take for yourself corporate opportunities that are offered to you as a result of your relationship with the Company without first offering such opportunities to the Company.



## Company Information Technology Assets

BeiGene's information technology assets, systems, and communication networks are intended for the sole purpose of conducting Company business and may only be used in accordance with the BeiGene Acceptable Use Policy, Bring Your Own Device "BYOD" Policy and other applicable Company policies and procedures. Company equipment, electronic messaging applications such as email, and other systems must never be used to access, receive or transmit material that is illegal, inappropriate, or otherwise violates applicable laws and regulations, the Code, and/or Company policies and procedures. Inappropriate use of such assets owned or leased by the Company, or otherwise in the Company's possession, may expose our data and systems to substantial risk.

Computers, smartphones, tablets and other personal devices used for conducting Company business should be password protected with multi-factor authentication and properly secured at all times. Software that is not properly licensed or lawfully acquired may not be introduced into a Company computer or communication device. Further, no software of any kind may be introduced into Company-provided devices and communication systems without the prior approval of the BeiGene Information Technology Department, in accordance with Information Security policies and standards.

While the Company recognizes that Company Personnel may occasionally use BeiGene devices and email for incidental personal matters, such use should be reasonable and kept to a minimum.

## Protecting Our Information Technology:



- Always be professional when using Company systems
- Stop, look, and think before clicking on links or opening attachments in email. Report phishing emails using the Phish Alert button
- Do not create, send or download content or communications that could be considered offensive, derogatory, defamatory, harassing, obscene or vulgar
- Do not download unauthorized software or other programs

Take precautions to protect the security of computer systems, including corporate data, electronic communications, and applications.

Moreover, subject to applicable laws and regulations, Company Personnel shall have no expectation of privacy regarding any communications or materials (including emails or text messages) that are created, viewed, accessed, received or stored on BeiGene systems, applications or networks, including through BeiGene email and other systems used on your personal device. The Company's business records, including email and computer records, may become subject to internal review and/or public disclosure during internal investigations, audits, litigation, or government investigations.

Report any suspicious or malicious activity and security incidents to Information Security at [itsecurity@beigene.com](mailto:itsecurity@beigene.com).

For further information regarding the acceptable use of Company assets, please refer to the BeiGene Acceptable Use Policy, BYOD Policy, and Information Security Policy.

## Confidential Information and Intellectual Property

Confidential information is one of the Company's most valuable assets. Confidential information is a source of our competitive advantage and must be protected. "Confidential information" includes but is not limited to all non-public information that might be of use to competitors or harmful to the Company or its customers if disclosed, such as our intellectual property as well as proprietary information about the Company's operations, performance, technology, products and/or personnel.

Company Personnel must only use confidential information for legitimate business purposes, in accordance to the Data Classification Standard, and may not disclose or distribute such information, except when disclosure is authorized by the Company or required by legal or regulatory requirements.

Company Personnel must also be careful to maintain the confidentiality of information entrusted to them by the Company's customers, suppliers, business partners and collaborators..

To help protect BeiGene confidential information, always keep the following principles in mind:

- Utilize care when conducting BeiGene business in public areas;
- Use screensavers when working on computers in unsecure spaces;
- Beware of requests for information from external sources;
- Dispose of confidential information properly;
- Exercise care when storing and transmitting confidential information;
- Protect and do not share any login account names, usernames, and passwords used for Company business;

### What do I do if I receive confidential information about a competitor?



The confidential information of third parties, including our competitors, must be respected and must not be used by BeiGene. If you become aware of information about a third party you believe to be confidential, refrain from further sharing or distributing the information and immediately contact the Legal and Compliance Department for guidance.



- Report any incident of improper or accidental disclosure to your manager or the Legal and Compliance Department; and
- Do not provide confidential information to third parties, including vendors or contractors, without appropriate authorization and required confidentiality agreements.

The obligation to preserve and protect BeiGene confidential information continues even after employment with the Company ends. Additionally, Company Personnel must abide by any legal and contractual obligations that they have to a former employer restricting the use and disclosure of its confidential information.



# Commitment to the Company and our Shareholders

We respect and uphold our obligations to investors, regulators, patients and the public by maintaining the integrity of our books and records.

### **Integrity of Books and Record Keeping**

Accurate financial and business records are essential for managing our business, maintaining investor confidence, complying with legal and regulatory requirements, and satisfying obligations to our customers, vendors and others with whom we do business.

Therefore, our corporate and business records must always be completed accurately, honestly and in a timely manner. The making of false or misleading statements and entries relating to our financial and accounting records or results is strictly prohibited. Any individual who becomes aware of a departure from these standards has a responsibility to promptly report this information using the reporting procedures provided in the Code.



### **Record Retention**

BeiGene's business records must be maintained in compliance with applicable laws and regulations (e.g., regulatory filings, tax filings, employment and contractual obligations) and, when appropriate, disposed of in accordance with the Company's Global Records Retention and Disposition Policy and Global Records Retention and Disposition Schedule. "Business records" are any recorded information captured in any medium that reflects circumstances, events, activities, transactions or results created or maintained as part of conducting business for BeiGene. These records may be physical or electronic.

Examples of media containing business records include paper documents (including hand-written notes or lab notebooks), audio or video recordings, and computer-based information such as email and computer files. Company Personnel are expected to be familiar with the document retention requirements applicable to their role and business activities and should consult with their manager for guidance when needed.

In addition, under some circumstances, such as litigation or government agency requests, the Company may be required to preserve documents and information beyond their normal retention period. If required to do so, we must be diligent in adhering to any document hold requests.

For further information regarding records retention, please consult with the Information Governance Program Office.

### **Securities Trading**

Company Personnel are prohibited from buying, selling or engaging in any transaction with respect to securities (e.g., shares, ADSs, options, RSUs or derivatives) of BeiGene or any other company with whom BeiGene conducts business or exchanges confidential information while in possession of material, non-public information ("Inside Information"). This restriction applies to all securities markets where BeiGene securities are traded (e.g., the NASDAQ Stock Market and the Stock Exchange of Hong Kong). "Material information" is any information that a reasonable investor could consider important in making an investment decision. Those in possession of material, non-public information must refrain from buying or selling relevant securities until market close after the first full trading day following public disclosure of that information. Also prohibited is the sharing with or disclosing of Inside Information to others—commonly known as "tipping."

To avoid even the appearance of trading on Inside Information, some Company Personnel may be designated as “Restricted Insiders” by the Company’s General Counsel (the “Insider Trading Compliance Officer” under this Policy) and subject to additional requirements under the BeiGene Special Trading Procedures for Insiders (“Trading Procedures”). Generally, the Trading Procedures require Restricted Insiders to obtain pre-clearance of all transactions in the Company’s securities from the Insider Trading Compliance Officer, or if unavailable, the Company’s Chief Financial and Strategy Officer.

**Examples of material, non-public information that an investor could consider important in deciding whether to buy, sell or hold securities could include:**



- financial results;
- potential mergers or acquisitions;
- licenses;
- clinical trial results; and
- regulatory guidance or action.

Violations of securities laws are taken very seriously. If you are uncertain about the implications of a purchase or sale of any BeiGene or other company securities by virtue of your service relationship with the Company, you should consult with the Insider Trading Compliance Officer before entering any such transaction.

For more information regarding trading in Company securities, please refer to the BeiGene Statement of Company Policy on Insider Trading and Disclosure and the BeiGene Special Trading Procedures for Insiders.

## Privacy and Data Protection

The majority of countries have adopted strict privacy and data protection laws (“Privacy Laws”) governing the collection and use of individuals’ personal data. Generally, personal data, also known as personal identifiable information, is any information that relates to an identified or identifiable living individual. Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data. Examples of personal data include date of birth, name, age, gender, home address, phone, or data held by BeiGene or a third party, which could be a symbol that uniquely identifies a person. Privacy Laws are broad and generally apply to the collection and use of personal data from various sources, including but not limited to patients, clinical trial subjects, vendors, customers, healthcare professionals, visitors to our websites and Company Personnel.

**Protecting the privacy and security of personal data is a growing global concern. The majority of countries have enacted or are enacting or strengthening Privacy Laws that govern the use of personal data and holding transgressors accountable.**

We are committed to protecting the privacy and security of all personal information — including sensitive health information — that comes into our possession in compliance with applicable laws.

For further information regarding privacy and data protection requirements, please refer to BeiGene privacy and data protection policies and procedures.

## Scientific Integrity

We are committed to conducting our research and development operations in accordance with applicable laws and regulations and internationally recognized quality standards, such as those for Good Laboratory Practice (GLP) and Good Clinical Practice (GCP). We uphold the integrity of the Company's research and clinical development activities by ensuring that all pre-clinical and clinical development is conducted in accordance with the highest ethical, medical, and scientific standards.



Scientific misconduct in all of its possible forms is strictly prohibited. Examples of scientific misconduct include, but are not limited to, fabrication, falsification, or plagiarism in proposing, conducting, or reporting research, disregarding the intellectual contributions and property of others, impeding the progress of research, and corrupting scientific records.

We seek to provide transparency in all of our research results and outcomes, whether positive or negative. In doing so, we strive to advance scientific knowledge, enhance patient care and preserve the trust of our stakeholders.

## Social Media

"Social Media" generally refers to digitally published information and online content, including, but not limited to, websites and applications for social networking (e.g., WeChat, Facebook, LinkedIn, Twitter, Weibo, QQ, and other online discussion or messaging forums) and other forms of online communication.

Because our personal use of Social Media to discuss Company activities or business may carry potential legal and reputational implications for the Company, the following requirements must be observed:

- Only authorized Company Personnel and spokespersons are permitted to use Social Media to communicate information about the Company's business and operations, including but not limited to clinical studies, therapies, financial and operational results, and business dealings (e.g., announcement of a collaboration with a new business partner);
- Do not make unauthorized disclosures of confidential information, and generally avoid mixing personal and business-related content;
- Always be truthful and accurate in postings and recognize that online comments are never truly anonymous;
- Never post anything that could violate the Code and Company policies and procedures against unlawful harassment, discrimination and retaliation, or that would otherwise reflect negatively on the Company, or disparage other parties; and
- Use of Social Media must comply with applicable laws and regulations, the Code, and Company policies and procedures related to product promotion, privacy and pharmacovigilance.

**When you refer to BeiGene in social media, remember that such communications can be interpreted by external audiences, including regulators, as official statements on the Company's behalf.**

For further information regarding social media use, please refer to the BeiGene Social Media Use Policy and/or consult with the BeiGene Corporate Communications Department.

### **Media, Investor or Other Public Inquiries**

BeiGene is committed to delivering accurate and reliable information to the media, financial analysts, investors and other members of the public. This information should be disclosed only through Company-approved channels to ensure that all those with an interest in the Company receive equal access to information.

All inquiries or calls from the media, investors or others should be referred to the BeiGene Investor Relations Department or Corporate Communications Department. We have designated specified individuals in these departments, as well as certain Company Officers, as our official spokespersons for the Company. Unless specifically authorized by the Investor Relations Department or Corporate Communications Department, these designees are the only Company Personnel who may communicate with the media, investors or others on behalf of the Company.



### **If a reporter contacts me about basic information on BeiGene, may I provide brief answers?**



No. Even simple questions must be forwarded to our Corporate Communications Department and/or Investor Relations Department to ensure that all relevant facts are provided in an accurate and consistent manner. This also helps ensure that potential material information is publicly disclosed according to Company plans and in compliance with applicable securities laws.

### **Cooperating with Government Investigations**

BeiGene is committed to cooperating with all government requests for information relating to the Company or its operations. This commitment does not limit the Company's efforts to protect and defend its interests and rights afforded under law. If you are presented with a government agency request for information or access to Company facilities, documents or assets, and circumstances allow, notify the BeiGene Regulatory Affairs Department or the Legal and Compliance Department before proceeding.



**Code Dissemination, Amendments, and Waivers**

The Company will distribute the Code to all Company Personnel and make it available on the Company's website. All Company Personnel must acknowledge that they have read and understand the Code and that they will comply with it. Violation of the Code may result in discipline, up to and including termination of employment.

BeiGene reserves the right to amend or alter the Code at any time and for any reason; provided that any amendment shall be publicly disclosed to the extent and in the manner required by applicable legal and regulatory requirements. The Company's Board of Directors must approve any material amendment of the Code.

Any waiver of the Code for BeiGene's Directors or Executive Officers may be made only by the Company's Board of Directors and shall be promptly disclosed, along with the reasons supporting such waiver, to the extent and in the manner required by applicable legal and regulatory requirements.



