

# Code of Ethics

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# Our Core Values and Commitments

## Core Values



## Leadership Commitments



### **I AM BOLD**

in aspiration and agile in execution

### **I CARE**

and make time for people

### **I LISTEN**

and speak openly and explain the “why”

### **I TRUST**

others and myself to make sound decisions

### **I OWN**

the impact of my words and actions



# A Letter from Daniel O'Day, Chairman & Chief Executive Officer



I am pleased to introduce the Code of Ethics for Gilead and Kite. This is essentially our guide to “doing the right thing,” every time, no matter where we are in the world. Instead of specifying detailed rules, our Code focuses on the most important principles and expectations about how we should work with our customers, third parties, business partners and with each other. It is our responsibility to understand and follow this Code, in addition to the various policies that apply to our work.

At Gilead, we are committed to maintaining the highest standards of legal and ethical conduct. This Code reflects the business practices and principles of behavior that support this commitment. It should be considered against the backdrop of our core values of Integrity, Inclusion, Teamwork, Accountability and Excellence.

There is nothing more important to Gilead than making sure we do what is right. Each of us has a responsibility to take ownership of ethics and to incorporate ethical decision-making in every situation. Sometimes the right thing is not always obvious, particularly in the complex global environment in which we operate. Whenever the path is unclear, employees should seek guidance from people leaders or other internal sources as referred to in this Code.

I thank you for your support in ensuring that we continue to uphold these principles in everything we do.

Best regards,  
Daniel O'Day

# A Letter from Robert Ladd, Chief Ethics and Compliance Officer



At Gilead, our commitment to ethical excellence is the foundation of everything we do. As we share our Code of Ethics, we reaffirm our dedication to maintaining the highest ethical standards across our organization. This Code is more than a set of guidelines—it is a reflection of our shared values and a roadmap for leading with decisions that are principled, transparent and aligned with our mission.

Each of us plays a vital role in fostering a culture of trust and integrity. By doing what's right and demonstrating ethical behavior in every decision and interaction, we strengthen our collective impact and uphold our reputation. Let this Code serve as both a guide and a reminder of our responsibility to one another, to our partners, and to the patients and communities we serve.

Best regards,  
Robert Ladd







# Our Code - Our Responsibility

This Code of Ethics is our public commitment to doing business the right way by acting honestly, fairly and with high standards of integrity. Integrity is essential to achieving our mission to serve patients, build and maintain trust with all our stakeholders, protect Gilead, our employees and others we work with, and preserve our reputation.

Our Code serves as a valuable resource to help us make sound, ethical decisions in the best interests of Gilead and those we serve. It includes references to relevant Gilead policies and procedures (collectively “policies”), and other helpful resources. As it is not possible to cover every possible situation, we rely on you to use good judgment and to speak up when you have questions or concerns.

As we operate globally, there may be times when local laws, regulations or customs conflict with or differ from our Code. In such cases, you should be guided by the stricter standard.







## 1.1

### Who Must Follow Our Code

Our Code applies to all employees, officers, directors and contractors of Gilead, its affiliates and subsidiaries (collectively “Gilead Personnel”).

We also expect third parties who are authorized to act for or on behalf of Gilead to act consistently with the Code.



## 1.2

### Non-Compliance

Gilead Personnel who violate any of the applicable laws, regulations, our Code or any other Gilead policy may cause liability and/or serious reputational harm to Gilead and will be subject to appropriate measures, including disciplinary action up to and including termination.



## 1.3

# Employee Responsibilities

## OUR EXPECTATIONS

- Read, understand and follow the information in our Code
- Act in a manner that is ethical, appropriate and consistent with applicable laws, regulations, our Code and other Gilead policies that are relevant for your role based on your business and geography
- Speak up if you become aware of possible violations of laws, regulations, our Code or any other Gilead policy. See section 7 for details on how you can raise a concern



*“At Gilead, ethics isn’t just a policy - it’s a promise. Every time I make a decision, I think about the patients who rely on us. Doing the right thing is how we honor that trust.”*

**Marvin Barnes, Executive  
Therapeutic Specialist, HCV Sales**

## 1.4

# Additional Responsibilities of People Leaders

## OUR EXPECTATIONS

- Lead by example, acting as a good role model of ethical behavior
- Help your team understand the information in our Code and other Gilead policies relevant to their role
- Foster a culture where ethical conduct is recognized and valued, and where compliance is viewed as a core requirement
- Encourage your team to ask questions and speak up, and do your part to make sure that no one experiences retaliation for doing so
- Consistently enforce our Code of Ethics







# Our People

We are committed to enhancing Gilead's reputation as a fair and equitable employer, and providing professional development and learning opportunities in a safe and inclusive working environment.



## Inclusion

Inclusion is one of our core values. We value and respect inclusion and promote equal opportunities through our recruiting and promoting processes. We evaluate employees based on their skills and proficiency, irrespective of their age, ethnic origin, gender, religion or sexual orientation or any other characteristic protected by applicable employment laws.

### OUR EXPECTATIONS

- Treat everyone with fairness, respect and dignity
- Base your work-related decisions on merit alone
- Read, understand and follow Gilead's global and local HR policies and guidance on inclusion
- For more information access: G.Net/Employee Resources/Talent, Development & Inclusion or via KiteNet



## Bullying and Harassment

We strictly prohibit any form of bullying or harassment in the work environment. Harassment includes any form of behavior that violates the dignity of a person and creates an intimidating, hostile, degrading, humiliating or offensive work environment.

### OUR EXPECTATIONS

- Never write, display or send any offensive messages or make any derogatory remarks or inappropriate jokes
- Understand that inappropriate comments of a sexual nature or any other sexually offensive behavior will not be tolerated
- Read, understand and follow your local Gilead HR policies on bullying and harassment

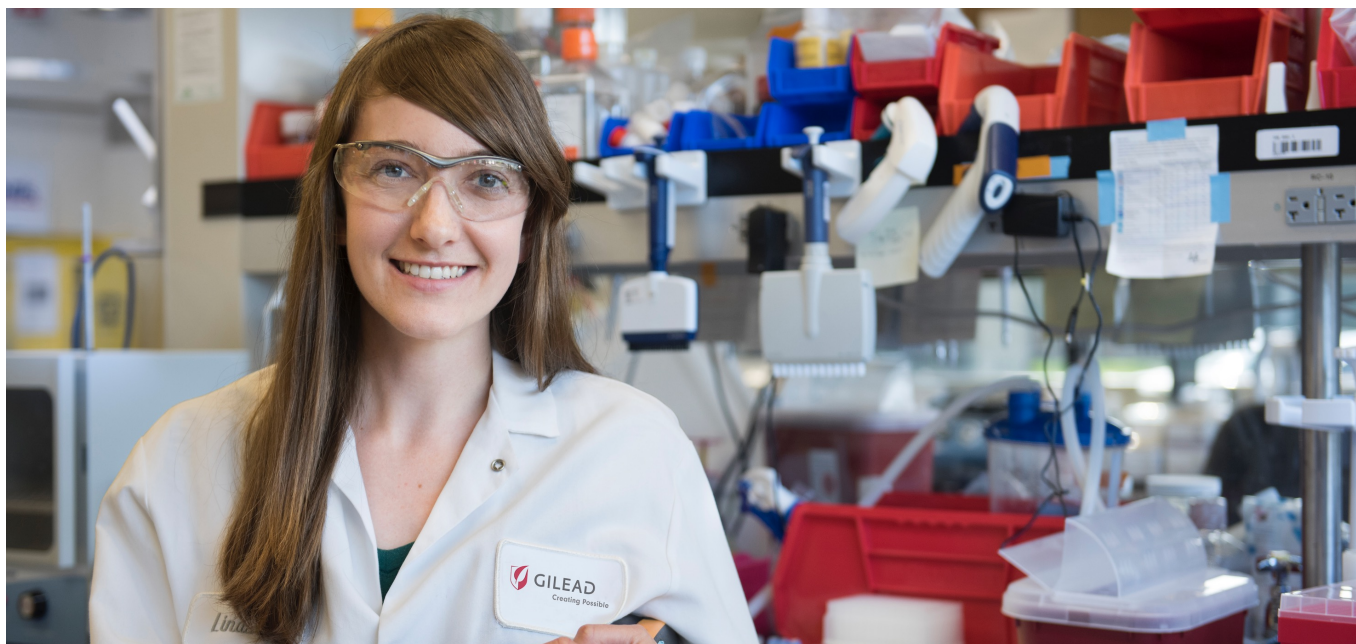


## Health, Safety and Security

We are committed to providing a safe and professional work environment to protect the health and well-being of all our personnel, third parties, business partners and other visitors.

### OUR EXPECTATIONS

- Adhere to health, safety and security laws and regulations, Gilead's Environmental, Health and Safety Commitment (EH&S) Statement and site-specific requirements
- Report emergencies including accidents, injuries, urgent medical needs, or unsafe conditions via your site's emergency number and follow your site's emergency response plan
- For remote and field workers, report security incidents or concerns via Gilead's Security Operation Center (SOC) at +1 (650) 522-5666 or at [security@gilead.com](mailto:security@gilead.com) or via the confidential online portal on the Corporate Security G.Net SharePoint page.
- For all non-emergency accidents, injuries or illnesses or when after an emergency situation is no longer in emergency status, submit an incident report using the Incident Report widget on the G.Net homepage
- Read, understand and follow your local Gilead policies on access control, visitor management, travel security, health, safety and the emergency procedures that apply to your work location
- Visit the Environmental Health and Safety (EHS) and the Corporate Security G.Net pages for more information and resources







# Our Industry

We work to the highest standards of ethical conduct in our interactions with the healthcare community, complying with the laws, regulations, industry codes and practices (collectively “Industry Standards”) that govern the pharmaceutical industry and our company. These Industry Standards relate to research and development, manufacturing, promotion, marketing, and distribution, as well as interactions with healthcare professionals, government officials, patients and other third parties.



## Drug Safety and Quality

We are committed to patient safety and follow stringent control procedures to monitor and ensure the safety, efficacy and quality of our products at every stage of their lifecycles and to prevent and detect others from selling counterfeit, adulterated and illicit versions of our products.

### OUR EXPECTATIONS

- We all have an important role in ensuring patient safety through the collection of safety information and ensuring that third parties acting on Gilead's behalf do the same
- Safety information includes unfavorable or undesirable experiences. It also includes situations not adverse in nature, but important to enable Gilead to analyze and communicate effectively on the safety of our products to providers and patients such as pregnancy, product quality complaints and inappropriate device use
- Report safety information whether expected or unexpected and whether or not attributable to a Gilead product within 24 hours after becoming aware of safety information, in accordance with the Global Adverse Event and Product Quality Compliant training



## Scientific and Research Integrity

We conduct various research and development-related activities to fulfill our mission to discover and make available innovative medicines to address unmet medical needs. We conduct these activities ethically and ensure the data generated is in compliance with Industry Standards on data integrity.

### OUR EXPECTATIONS

- Respect the rights, dignity and safety of the participants and communities who participate in our research
- Sponsor studies and clinical trials with the goal to enhance clinical or scientific knowledge of disease, therapies and/or Gilead products, and always for the ultimate benefit of patients
- Read, understand and follow the applicable Industry Standards, Business Conduct Manuals (BCMs) and other Gilead research and development policies required to perform your role





## Animal Welfare

We are committed to the ethical treatment and responsible use of animals as part of our research studies. We only use animals when alternatives will not provide the data necessary to discover, develop or obtain regulatory approval of safe and effective medicines.



### OUR EXPECTATIONS

- Ensure all animal welfare efforts are considered, including but not limited to the 3R principles: **R**eplace the use of animals with any other relevant method when possible; **R**educe the number of animals to the minimum necessary to ensure reliable results; and **R**efine techniques to promote animal welfare, quality of life, and social well-being
- Read, understand and follow the applicable Industry Standards, including the Guide for the Care and Use of Laboratory Animals (NIH), and the Animal Use and Welfare Policy where required to perform your role

## Professional Interactions with the Healthcare Community

We work with healthcare professionals, patient organizations, payer bodies and others in the healthcare community for the right reasons, in a transparent and ethical way. We comply with Industry Standards on the promotion of prescription medicines.

### OUR EXPECTATIONS

- Ensure that we always have a clear, legitimate and appropriate business purpose for all our interactions
- Ensure that we are using appropriate tools to communicate, as outlined in the E-Communications Policy
- Promote our products in compliance with the applicable BCM and related policies and procedures, which incorporate the Industry Standards
- Ensure that all information and materials are accurate, fair, balanced, not misleading and shared appropriately
- Do not provide anything of value to inappropriately influence a decision to approve, reimburse, prescribe, purchase or recommend a Gilead product
- Read, understand and follow the applicable BCM and related policies and procedures required for you to perform your role





# Our Business Dealings

We work with our customers, suppliers, third parties and business partners in an honest, respectful and responsible way. We comply with all applicable laws in relation to our business dealings, supporting fair, open and free competition.





## Conflicts of Interest

We all have a duty to act in the best interests of Gilead. A conflict of interest exists when your loyalties or actions are divided between Gilead's interests and those of another party, including your own self-interests.

### OUR EXPECTATIONS

It is essential that you avoid any situation or interest that might interfere, or be perceived by others to interfere, with your judgment or responsibilities to Gilead. Be aware of the many different ways in which conflicts of interests can occur. For example:

- You have a financial interest that could affect your judgment
- You gain personal enrichment through access to Gilead's confidential information relating to Gilead's business
- You conduct personal business on Gilead time or use Gilead's physical or intellectual property resources
- You misuse your position at Gilead in a way that results in personal gain
- A family member has a personal interest in a competitor, supplier or customer of Gilead
- Disclose situations to your people leader that might create a conflict, or even the appearance of a conflict
- Read, understand and follow the Conflicts of Interests Policy and the Procurement Code of Conduct



## Anti-Bribery and Anti-Corruption

We compete in the marketplace solely on the merits of our products and do not tolerate bribery or corruption in any form.

### OUR EXPECTATIONS

- Bribery of any kind is strictly prohibited. Do not give, offer, promise or receive anything of value, directly or indirectly through a third party with the intent to obtain an improper business advantage for Gilead
- We prohibit facilitation payments. These are small unofficial payments to low-level government officials to speed up or obtain routine administrative processes
- We must oversee third parties who provide services for or on behalf of Gilead as we may be responsible for their actions
- Read, understand and follow the Anti-Bribery and Anti-Corruption Policy, and the applicable BCM and related policies and procedures

## Political Activity

We engage in political activities to make our position known on relevant government healthcare issues and also to advance our objective to provide patients with access to our products. Where permitted under local laws, we make publicly disclosed contributions to local political candidates or organizations, based on objective, transparent criteria.

### OUR EXPECTATIONS

- We must never engage in any political activity with the intention to influence a decision in an improper way for the benefit of Gilead
- You have the right to personally participate in the political process, however, you need to make it clear that your personal views and actions are not those of Gilead and any such activities must be conducted only on non-Gilead time
- Where Gilead permits political contributions, ensure they are approved by the Gilead Political Action Committee by-laws for contributions in the United States, and International Government Affairs for outside of the United States
- Read, understand and follow the Global Anti-Bribery and Anti-Corruption Policy, and the applicable BCM and related policies and procedures



## Anti-Trust and Fair Competition

We compete actively, independently and fairly against other pharmaceutical companies to develop, produce, provide access to and supply medicines.



### OUR EXPECTATIONS

- Do not collaborate or exchange information with our competitors to maintain higher prices, coordinate offers in tender or bidding processes, or inappropriately allocate customers, territories or therapeutic markets
- Avoid any pricing strategies that would unfairly exclude competitors or prevent distributors or resellers from offering discounts out of their margins
- Do not rely on any unfair activities or incorrect or misleading statements to hinder the entry or use of generics or other competitors
- Read, understand and follow the Antitrust and Competition Law Policy

## Anti-Fraud

We believe that preventing and addressing fraud is everyone's responsibility. We do not tolerate any form of fraud.

### OUR EXPECTATIONS

- Fraud is the intentional use of false or misleading information to deceive the other party for the benefit of Gilead. Fraud includes (but is not limited to): false accounting, knowingly withholding information, falsification of research data, kickbacks, dishonest and/or inaccurate marketing material, off-label marketing and manipulation of clinical trial results
- We must not intentionally misrepresent any aspect of operations or financial data
- All business transactions, financial records and reporting must be conducted honestly and accurately and in compliance with laws and regulations





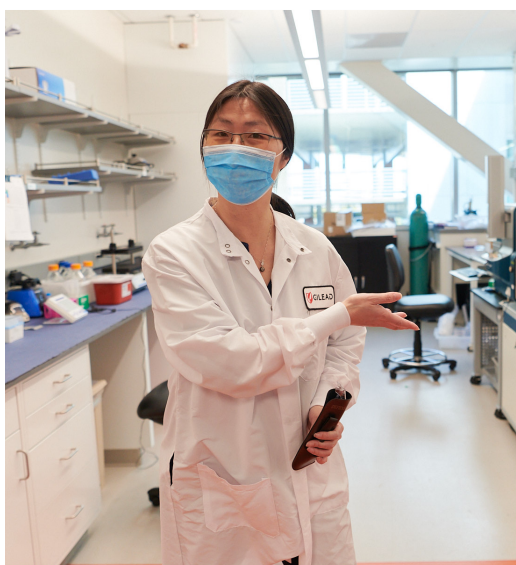
## International Trade

We are committed to compliance with all customs regulations, export controls and trade sanctions laws that apply to our operations globally. Many countries have laws that broadly prohibit or restrict companies such as Gilead from engaging in or facilitating trade, financial transactions or other business with specific countries (such as Cuba, Iran and North Korea), companies and/or individuals.

### OUR EXPECTATIONS

- If you deal with financial transactions and/or the movement of our products, goods, materials, services, equipment, software and/or technology, you must ensure that you read, understand and follow the applicable laws and regulations and Gilead policies required to perform your role
- To learn more, contact the Global Trade Compliance team or the Office of Ethics and Compliance (OEC)





# Our Assets and Information

We all have a duty to manage and protect Gilead's assets and any information we have access to, including the personal data of our patients, customers, colleagues, suppliers, third parties, business partners and others. Company assets include proprietary know-how, facilities, property and equipment, computers and IT systems, information and funds.



## Intellectual Property

**We must ensure that Gilead's intellectual property (IP) is protected and secure and avoid knowingly infringing the IP rights of others.**

### OUR EXPECTATIONS

- Understand that Gilead's IP includes patents, trade secrets, know-how, trademarks, copyrights and design rights
- Gilead's IP is a corporate asset that generates revenue. Therefore, we must maintain confidentiality of our non-public IP and not disclose it outside of Gilead
- Work with Gilead's IP team to secure protection for inventions, creative works, brands and other innovations
- Use the GILEAD brand and our other trademark assets consistently with brand playbooks and guidelines to maintain and strengthen IP rights and our reputation
- Respect the IP rights of others and acquire and use appropriately licensed copies of copyright- and patent-protected materials in carrying out our business
- To learn more, contact the Legal Intellectual Property team

## Confidential Information

**We expect all Gilead Personnel to appropriately handle any Gilead, customer, supplier, third party, business partner or other confidential information to which you may have been given access.**

### OUR EXPECTATIONS

- Understand what information is confidential and what type of confidential information you have access to. For example: preclinical and clinical data, manufacturing information, financial data, pricing analysis, business plans, customer and other third-party data, employee and previous employee data, contracts and other non-public corporate and scientific data
- Ensure that all company confidential information is appropriately classified, stored and shared in accordance with the applicable Gilead policies on confidentiality
- Only share confidential information for authorized purposes and to authorized individuals, both within and outside of Gilead. Sign non-disclosure agreements where necessary
- Do not use the confidential information for any personal gain; remember that you must not disclose confidential information even after you have finished working at Gilead







*“Ethics and innovation go hand in hand. We are able to lead in science because we lead with integrity. That’s what makes Gilead different.”*

**Moupali Das, Vice President, Clinical Development, HIV Prevention and Pediatrics**

### 5.3

## Protecting Personal Information

We will act ethically and responsibly when entrusted with personal information to protect the privacy of Gilead Personnel, patients, customers, suppliers, third parties, business partners and others with whom we interact.

### OUR EXPECTATIONS

- We are accountable for protecting personal information and for only using it in accordance with Gilead’s Standards, including the Policy on Protection of Personal Information, and applicable laws and regulations. Remember, ‘personal information’ generally means any information that can be used to identify an individual
- Collect, use and share only what you need for business purposes and delete it when no longer needed in accordance with records management policies
- Inform individuals how we will use information and obtain their consent when required
- Ensure appropriate safeguards are in place to prevent unauthorized access to, and use of, information



## Physical Assets and Gilead Systems

We are conscientious and act appropriately to ensure company assets are not damaged or lost and that our systems are not misused. We all have a responsibility for keeping our network and information secure.

### OUR EXPECTATIONS

- Use company assets and Gilead systems responsibly and for intended business purposes only in accordance with our Acceptable Use Policy
- Make sure your user IDs and passwords are secure; utilize strong passwords and change them regularly in accordance with our Corporate Passwords Policy
- Be vigilant to cyber threats (for example, phishing scams), and report any suspicious activity or incidents immediately to the Security Operations Center in accordance with our Cybersecurity and Data Privacy Incident Reporting Policy

## Insider Trading

We do not misuse material information that could affect Gilead stock or the stock of any other public company that does business with Gilead. Information is ‘material’ if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy or sell the stock, or release of the information could have an impact on the stock price.

### OUR EXPECTATIONS

- Never buy or sell Gilead stock or stock of any other public company that does business with Gilead if you have material, non-public information about Gilead or such public company
- Never directly or indirectly share material, non-public information with others
- Remember, these rules continue to apply for a period of six months after your employment with Gilead has terminated
- Read, understand and follow the Insider Trading Policy



## Communications with Investors and the Media

We must protect Gilead's image and reputation and ensure that any public communications are clear, accurate and consistent.

### OUR EXPECTATIONS

- Only authorized persons can talk to the media or members of the investment community
- All media or investor inquiries must be directed to the relevant Public Affairs team
- Remember that your social posts and comments can impact Gilead's reputation as they may be perceived as communications to the public
- Read, understand and follow the Policy on Communication with Investment and Media Communities and the Social Media for Employee Use Policy



## Accurate Books and Records

We all have a responsibility to be honest and transparent about our operations and performance. Business partners, regulators and the public rely on accurate and complete disclosures and business records.



### OUR EXPECTATIONS

- Ensure all transactions, including those made by our third parties, are properly authorized, recorded and reported (for example: storage of receipts and invoices), as required under applicable Gilead policies
- Read, understand and follow the applicable Gilead information governance policies on records retention when creating, retaining or destroying documents, including those in electronic formats
- Read, understand and follow Gilead's Legal Hold Policy







# Our Corporate Responsibility

Our corporate responsibility program addresses the social and environmental impacts of our business operations. We strive to be a responsible business because it makes us a better business.



## Managing Our Environmental Impact

We prioritize efforts in adopting sustainable practices and to manage our environmental impact of our products through their lifecycle in all locations where we operate.

### OUR EXPECTATIONS

- Adhere to environmental laws and regulations and Gilead's Environmental Health and Safety (EH&S) Commitment Statement and site-specific requirements. Report any potential environmental concern or violation
- Engage in local sustainability initiatives to reduce carbon, energy, water and waste and support product stewardship and sustainable purchasing efforts to achieve our corporate sustainability targets
- Be proactive and suggest ways of working that will improve our environmental performance
- Visit the Corporate Sustainability and the Environmental Health and Safety (EH&S) G.Net pages



## Artificial Intelligence and Use of Data

Artificial Intelligence (AI) has become a powerful tool in enhancing our operations and driving innovative solutions to discover and develop our therapies and improve health equity. We integrate AI into our workflows and decision-making processes in an ethical, safe and responsible manner, consistent with our AI Principles.

### OUR EXPECTATIONS

- We design and implement AI in a manner that is clear and understandable to stakeholders
- We prioritize security and privacy in the development and application of AI
- We take ownership over our work and its outcomes. This includes appropriate oversight to address any issues or biases that may arise and continually monitoring AI systems for performance and fairness
- For additional information, please contact the Enterprise Data Science Council via [AskEDSC@gilead.com](mailto:AskEDSC@gilead.com)



## Engaging with Our Communities

We are committed to engaging with our communities by acting philanthropically through the provision of grants and charitable contributions to not-for-profit organizations, and through volunteer programs.

### OUR EXPECTATIONS

- Be proactive and encourage your colleagues to participate in Gilead's Corporate Matching Donation and Volunteer Programs ('Giving Together')
- Do not provide any corporate giving to inappropriately influence a decision to approve, reimburse, prescribe, purchase or recommend a Gilead product or for any other business advantage
- Read, understand and follow the Corporate Giving Guidelines and applicable BCM and related policies and procedures required to perform your role
- To learn more, access [G.Net/Giving Together](#)

## Responsible Supply Chain Practices

We value our suppliers and business partners and work to always treat them honestly, fairly and with respect. We expect our suppliers and business partners to share our commitments to ethics and compliance and to read, understand and follow the Supplier Code of Conduct.

### OUR EXPECTATIONS

- Select suppliers and business partners based exclusively on normal commercial considerations, such as quality, cost, availability, service and reputation
- Communicate clearly to our suppliers and business partners our expectations in relation to ethics and compliance under our Supplier Code of Conduct
- We prioritize the environment by reducing greenhouse gas emissions, conserving natural resources and operating in ways that minimize the release of pharmaceuticals into water resources
- Read, understand and follow the applicable Gilead policies on procurement required to perform your role
- To learn more, including about the Supplier Inclusion Program, access [Gilead.com/Company/Supplier Information](#)





## Commitment to Human Rights

We seek to conduct our business in a manner that respects the human rights and dignity of people. Each of us can play a role in the elimination of human rights abuses such as child labor, slavery and human trafficking, and forced labor.

### OUR EXPECTATIONS

- Support and respect the protection of human rights and ensure that our suppliers and business partners do the same
- Adhere to, and ensure our suppliers and business partners do the same, the following international standards:
  - [UN Universal Declaration on Human Rights](#)
  - [UN Convention on the Rights of the Child](#)
  - [Ten Principles of the UN Global Compact](#)
  - [OECD Guidelines for Multinational Enterprises](#)
  - [ILO Declaration on Fundamental Principles and Rights at Work \(amended in 2022\)](#)
- To learn more, access [Gilead.com/Company/Supplier Information](https://Gilead.com/Company/Supplier%20Information)



*"Integrity is the foundation of everything we do. Whether we're developing treatments for HIV or advancing oncology research, we hold ourselves to the highest standards - because lives depend on it."*

**Ona Gardner, Senior Director, Global Compliance Operations**



# How to Speak Up Without Retaliation

We all have a responsibility to speak up if we become aware of possible non-compliance of laws, regulations, our Code or any other Gilead policy.

## ► How you can raise a concern

There are a number of ways you can raise a concern. You can contact a member of management, the Legal or Office of Ethics & Compliance Departments, a Human Resources Business Partner or any individual responsible for enforcing the Complaint Procedure and Non-Retaliation Policy or other relevant local policies.

Gilead's Ethics Hotline is accessible to all employees globally. It is operated by an independent, third-party provider, and is available 24 hours a day, every day of the year. Concerns may be reported via phone (local toll-free numbers have been set up in most countries) or on the web. The phone and web-based reporting systems are available in multiple languages and reporting may be made anonymously where permitted by local law and will be answered by a knowledgeable person promptly.

Reports are handled in accordance with Gilead's Complaint Procedure and Non-Retaliation Policy and Gilead's Investigations and Disciplinary Policy. Gilead will not tolerate any form of intimidation or retaliation by any officer, employee, contractor, subcontractor, or agent of Gilead against anyone filing a report in good faith.