

Code of Ethics

November 2022



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Our Core Values and Commitments

Core Values



INTEGRITY

Doing what's right

INCLUSION

Encouraging diversity

TEAMWORK

Working together

EXCELLENCE

Being your best

ACCOUNTABILITY

Taking personal responsibility

Leadership Commitments



I AM BOLD

in aspiration and agile in execution

I CARE

and make time for people

I LISTEN

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 updated 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.

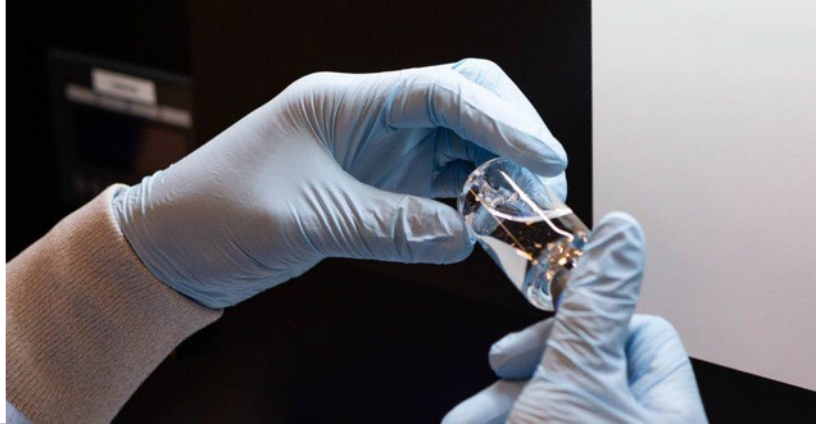
At Gilead, we are committed to maintaining the highest standards of legal and ethical conduct. This Code reflects the business practices and principles of behavior that support this commitment. It should be considered against the backdrop of our core values of Integrity, Inclusion, Teamwork, Accountability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

There is nothing more important to Gilead than making sure we do what is right. 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 managers 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





1.0

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. 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 and procedures 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



1.4

Additional Responsibilities of Managers

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



2.0



Our People

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



2.1

Inclusion and Diversity

Inclusion, encompassing diversity, is one of our core values. We value and respect inclusion and diversity 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 without any prejudice
- Read, understand and follow Gilead's global HR policies and guidance on inclusion and diversity
- For more information access: [G.Net/Employee Resources/Talent, Development & Inclusion](#) or via KiteNet



2.2

Bullying and Harassment

We strictly prohibit any form of bullying or harassment in the work environment. Harassment includes any form of behavior with the purpose or effect of violating the dignity of a person and of creating 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

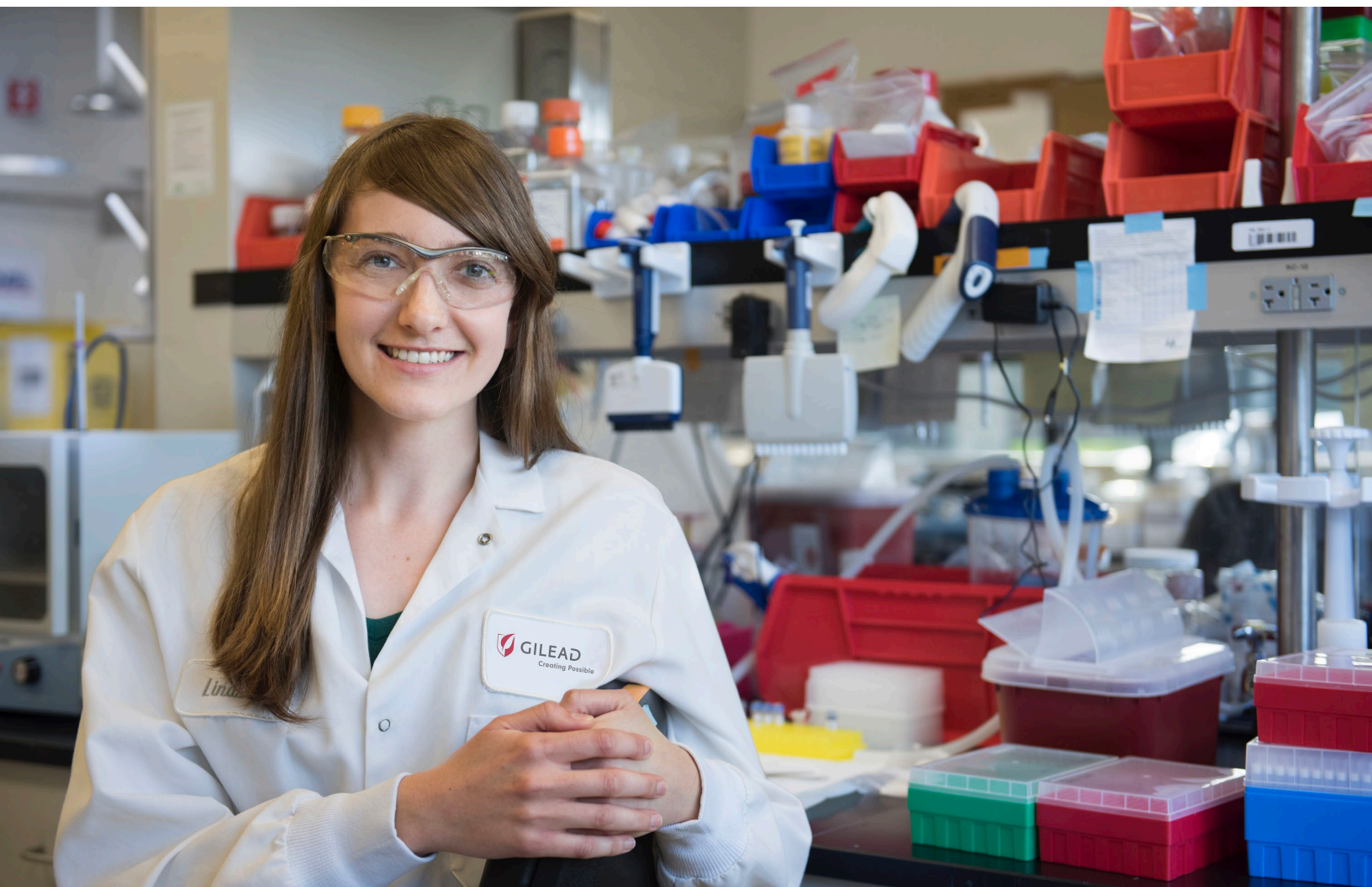


Health, Safety and Security

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

- Report any accident, injury, illness or unsafe condition immediately to your local facilities manager
- Know the emergency procedures that apply where you work and contact Gilead's Security Operation Center (SOC) on +1 (650) 522-5666 with any questions you may have. The SOC is staffed 24/7
- Read, understand and follow your local Gilead policies on health, safety and security
- To learn more, access G-Net/Employee Resources/Environmental Health and Safety or Corporate Security





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.



3.1

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.

OUR EXPECTATIONS ———

- Report any unfavorable, unexpected or undesirable result associated with Gilead product use, whether or not attributable to a Gilead product, within 24 hours after becoming aware of the adverse event, in accordance with the Global Adverse Event and Global Product Quality Complaints awareness training
- Read, understand and follow the relevant Industry Standards and Gilead policies required to perform your role



3.2

Scientific and Research Integrity

We conduct various research and development-related activities to fulfil our mission to discover and market 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



3.3

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: Replace the use of animals with any other relevant method when possible; Reduce the number of animals to the minimum necessary to ensure reliable results; and Refine techniques to promote animal welfare, quality of life, and social well-being
- Read, understand and follow the applicable Industry Standards and the Animal Use and Welfare Policy where required to perform your role

3.4

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
- Promote our products in compliance with the applicable BCM and related policies, 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 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 line manager 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

Political Activity

We engage in political activities in order 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 improperly influence a decision 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
- Ensure that any Gilead political contributions are approved in accordance with the applicable laws and, in the United States, the Gilead Political Action Committee by-laws
- Read, understand and follow the Global Anti-Bribery and Anti-Corruption Policy, and the applicable BCM



Antitrust 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

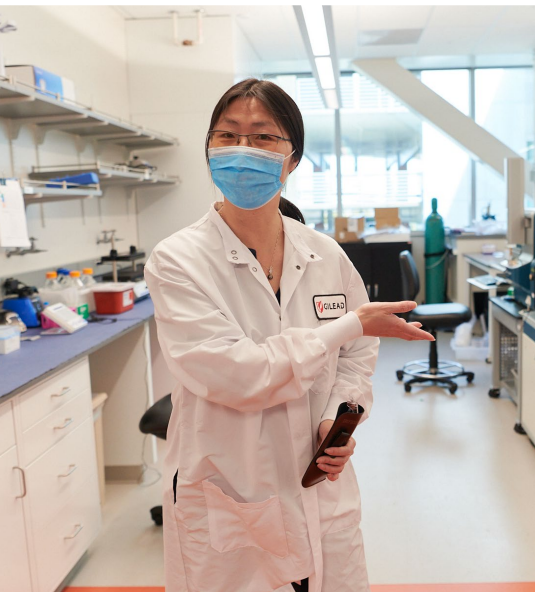
International Trade

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





Our Assets and Information

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



5.1

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

5.2

Confidential Information

We expect all Gilead Personnel to safeguard, on a need-to-know basis, any Gilead, customer, supplier, third party, business partner or other confidential information to which you may have been given access.

OUR EXPECTATIONS ———

- Know what type of confidential information you have access to. For example: financial data, pricing analysis, business plans, customer data, contracts and other non-public corporate data
- Do not disclose this information outside of Gilead unless authorized to do so or use the information for any personal gain; remember that you must not disclose confidential information even after you have finished working at Gilead
- Read, understand and follow the Confidentiality Policy and the applicable Gilead IT policies on how to secure confidential information





5.3

Protecting Personal Information

We respect and protect the privacy of Gilead Personnel, patients, customers, suppliers, third parties, business partners and others with whom we interact, by appropriately handling personal information when needed to operate effectively or to comply with the law.

OUR EXPECTATIONS —————

- If your role requires use of personal information, ensure you are familiar with the applicable data privacy laws and regulations regarding the collection, processing, use and protection of personal information, as well as Gilead principles for handling personal information
- Remember, ‘personal information’ generally means any information that can be used to identify an individual, including but not limited to: name, address, data of birth, marital status, contact information and financial records, such as salary and benefits details
- Read, understand and follow the Privacy Statement and the Policy on the Protection of Personal Information



5.4

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



5.5

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, 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
- We must respect the value of IP (both that of Gilead's and of others), supporting Gilead in defending its rights responsibly and respecting the rights of others
- To learn more, contact the Legal Intellectual Property team



5.6

Physical Assets, Including IT

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

OUR EXPECTATIONS ———

- Make sure your user IDs and passwords are secure
- Be vigilant against cyber threats such as phishing attacks, and report any security incidents immediately to ITSecurity@gilead.com
- Personal use of computer equipment, phones, email and internet access must be reasonable and not excessive. Any viewing of inappropriate material, which includes illegal activity, is strictly prohibited
- Read, understand and follow the applicable Gilead IT policies on Acceptable Use, Corporate Passwords and Emails

5.7

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 Social Responsibility

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



6.1

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

- Engage in local sustainability initiatives to reduce carbon, water use and waste to achieve our targets
- Be proactive and suggest ways of working that will improve our environmental performance
- To learn more, access G.Net/Employee Resources/Environmental Health and Safety or Corporate Sustainability



6.2

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 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
- Read, understand and follow the applicable Gilead Procurement policies required to perform your role
- To learn more, including about the Supplier Inclusion Program, access [Gilead.com/About/Ethics](https://www.gilead.com/About/Ethics) and Code of Conduct/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
- To learn more, access [Gilead.com/About/Ethics](https://www.gilead.com/About/Ethics) and Code of Conduct/Supplier Information

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 Department or a member of the Committee responsible for enforcing the Complaint Procedure and Non-Retaliation Policy (as detailed in the Policy).

Gilead has also implemented an Ethics Hotline, through which concerns can be raised confidentially either online or by phone, and in local language.

All reports will be investigated promptly and in accordance with applicable laws and Gilead policies.

We do not tolerate retaliation against anyone making reports in good faith and/or assisting in investigations of possible violations. Any retaliation will be treated as a violation of our Code.

To raise a concern via the Ethics Hotline and/or to learn more about the Complaint Procedure and Non-Retaliation Policy, access [G.Net/Ethics & Compliance](#).