

ALKERMES PLC

CODE OF BUSINESS CONDUCT AND ETHICS

This Code of Business Conduct and Ethics (this “Code”) applies to the members of the Board of Directors and all officers and employees (hereafter “you” or “your”) of Alkermes plc and its subsidiaries (the “Company”). The Company has issued this Code to promote:

- your honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
- full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company submits to the United States (“U.S.”) Securities and Exchange Commission (“SEC”) and in the Company’s other public communications;
- compliance with applicable governmental laws, rules and regulations;
- your prompt internal reporting of any violations of this Code to a supervisor, the Company’s Chief Legal Officer or the Company’s Chief Compliance Officer (which role is currently held by the Company’s Chief Legal Officer);
- accountability for adherence to this Code; and
- deterrence of wrongdoing.

The effectiveness of this Code depends in part on your full cooperation in promptly disclosing to the individuals designated in the “*Reporting and Enforcement Mechanisms*” section below any conduct believed to violate the standards described in this Code. The Company has established procedures to ensure that you understand how to report any suspected violations. The Company expressly prohibits retaliation of any kind against anyone who in good faith reports suspected misconduct.

The Company seeks to foster a culture of compliance with applicable laws, rules and regulations and the highest standards of business conduct. Everyone at the Company is expected to promote this culture of compliance. Suspected violations of this Code or applicable laws, rules or regulations must be reported, and the Company will take appropriate steps to investigate them. Violators shall be subject to discipline, up to and including termination of employment, as deemed appropriate by the Company in its sole discretion.

This Code is not a comprehensive manual that covers every situation you might encounter. This Code is not intended to reduce or limit the other obligations you may have to the Company. Instead, this Code should be viewed as imposing the minimum standards the Company expects from you in the conduct of the Company’s business. You are expected to use good judgment in seeking to comply with all applicable laws, rules and regulations. If you have any questions about the provisions of this Code, or about how you should conduct yourself in a particular situation, you should consult your supervisor or the Company’s Chief Compliance Officer.

STANDARDS OF CONDUCT

You must ensure that any financial, business, or other activities in which you are involved outside the workplace are free of conflicts with your responsibilities to the Company. A conflict of interest may occur when your private interest in any way interferes, or even appears to interfere, with the interests of the Company. Such interest may impair your objective or effective performance of your duties to the Company. Conflicts of interest may also arise when a person (or his or her family member) receives some personal benefit, whether improper or not, as a result of his or her position in the Company.

You should promptly disclose any matter that you believe might raise doubt regarding your ability to act objectively and in the Company's best interest. The following is a non-exhaustive list of examples of situations involving potential or actual conflicts of interest that should be disclosed:

- employment by or acting independently as a consultant to any competitor, customer, supplier, business partner or collaborator of the Company;
- directing Company business to any entity in which you or your family member, has a substantial interest;
- owning a substantial interest in any competitor, customer, supplier, business partner or collaborator of the Company;
- using Company assets, intellectual property, or other resources for personal gain;
- accepting, whether by you or your family member, anything of more than nominal value – such as gifts, discounts, or compensation – from an individual or entity that does or seeks to do business with the Company; and
- accepting any position as an officer or director of (i) any outside business concern that currently has a business relationship with the Company, or is currently a competitor of the Company or expected to become a competitor of the Company or (ii) any not-for-profit entity if there is or may be a Company business relationship, directly or indirectly, with the not-for-profit entity or an expectation of financial or other support from the Company for the not-for-profit entity.

Directors, officers and the Company Secretary shall promptly disclose any actual or apparent conflict situation to the Chief Compliance Officer or to the Nominating and Corporate Governance Committee of the Board of Directors of the Company (the “Nominating and Corporate Governance Committee”). In addition, as required by Irish law, directors must declare any actual or apparent conflicts of interests to the Board of Directors of the Company (the “Board”) as soon as they become aware of such actual or apparent conflict.

Employees who are not officers shall disclose all such situations of which they are aware to an appropriate supervisor or department head, or to the Chief Compliance Officer or their designee. All supervisors and department heads who receive such reports must forward them promptly to the Chief Compliance Officer or their designee. Actual or potential conflicts of interest involving the Chief Compliance Officer should be disclosed directly to the Chief Executive Officer and/or the Nominating and Corporate Governance Committee.

Directors, officers and employees must obtain approval before proceeding with any activity that may involve an actual or potential conflict of interest. For directors and officers, such requests must be approved by the Nominating and Corporate Governance Committee; all other employees need only obtain approval of such requests from the Chief Compliance Officer or their designee.

Directors, officers and employees who have obtained the approvals required by this section must promptly notify the Chief Compliance Officer in the event of any material change in the nature of their relationship with the individual or entity posing the actual or potential conflict of interest, or in the nature of the individual or entity's relationship with the Company (e.g., if such entity later becomes a competitor of the Company).

Corporate Opportunities

As a director, officer or employee, you owe a duty to the Company to advance its legitimate

interests and may not (i) take for yourself or for any third party with which you are affiliated corporate opportunities that are discovered through the use of Company property or information or as a result of your position with the Company, unless such opportunities are first offered to, and rejected by, the Company and (ii) use corporate property, information, or your position with the Company for improper personal gain (whether direct or indirect) or to compete with the Company.

Directors and officers must adhere to their fundamental duties of good faith, due care, and loyalty owed to all shareholders, and act at all times in the best interests of the Company and its shareholders.

Insider Trading Policy

Employees, officers and directors of the Company are subject to the Company's Insider Trading Policy, a copy of which is available on ARC (the Company's internal website) and on the Corporate Governance page of the Investors section of the Company's website, and any other related policies that the Board may adopt from time to time.

Confidentiality

You must maintain the confidentiality of sensitive business, technical, or other information, including trade secrets, entrusted to you by the Company, its customers, suppliers, business partners or collaborators, except when, and to the extent, disclosure of such information is authorized by a manager or legally mandated. Additionally, you should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company, is not communicated within the Company except to employees who have a need to know such information to perform their responsibilities for the Company. Confidential information includes all non-public information that might be of use to competitors or harmful to the Company, its customers, suppliers, business partners or collaborators if disclosed. You may use confidential information solely for legitimate Company purposes and must return all Company confidential and/or proprietary information in your possession to the Company when you cease to be employed by, or to otherwise have a service relationship with, the Company. This obligation is in addition to the requirements of any confidentiality agreement that you may have entered into with the Company.

Notwithstanding the aforementioned, you will not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret¹ that (i) is made in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and solely for the purpose of reporting or investigating a suspected violation of law; or (ii) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

Honest and Ethical Conduct and Fair Dealing

You must act fairly, honestly, ethically and in good faith in any dealings on behalf of the Company with any of its customers, suppliers, business partners, collaborators, competitors, employees, and all others. You may not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. Moreover, you must comply with the antitrust, unfair competition and trade regulation laws of the United States, Ireland and any other country in which the Company conducts activities.

Protection and Proper Use of Company Assets

You must protect and seek to ensure the proper use of Company assets, property and

¹ All forms and types of information that the Company has taken reasonable measures to keep secret, where such information derives actual or potential independent economic value from not being generally known to, and not being readily ascertainable through proper means by, another person who can obtain economic value from the disclosure or use of the information.

information. You should protect against the improper disclosure, theft, or misuse of the Company's intellectual and physical property and other assets.

Company assets, property and information should only be used for legitimate business purposes. The content of the Company's electronic communication infrastructure (e-mail, voicemail, text messages, instant messaging, Internet access) is not protected by any right of personal privacy, and the Company can access and monitor your Company electronic communications and devices at any time without notice, unless prohibited under applicable law.

Compliance with Laws, Rules, and Regulations

The Company is committed to compliance with applicable laws, rules, and regulations. The Company also maintains separate, detailed policies regarding matters such as compliance with the Foreign Corrupt Practices Act ("FCPA"), insider trading, fair employment practices, bullying, harassment and sexual harassment that can be obtained through the Company's Chief Compliance Officer, on ARC, through the Company's Learning System (ComplianceWire) or through the Company's Human Resources department.

You must comply with all laws applicable to the Company's business and your position as a director, officer, and/or employee of the Company. Questions or concerns about, or reports of, compliance issues should be raised by any of the means described in the "Reporting and Enforcement Mechanisms" section below.

Full, Fair, Accurate, Timely and Understandable Disclosures

The Company strives to ensure that all business records and financial reports are accurate, complete, understandable, and not misleading. The Company is committed to complying with applicable laws requiring the full, fair, accurate, timely and understandable disclosure of material information and ensuring the accuracy of publicly disseminated information. To that end, the Company maintains internal controls and procedures designed to provide reasonable assurance of the safeguarding and proper management of the Company's assets; the reliability of its financial reporting in compliance with generally accepted accounting principles; and compliance with applicable laws and regulations. The Company is committed to maintaining disclosure controls and procedures designed to ensure that financial and non-financial information is collected, analyzed, and timely reported in full compliance with applicable law. Only certain officers and certain employees in the Corporate Affairs, Investor Relations and Legal departments are authorized to disclose non-public information about the Company to the public, members of the investment community (including analysts), or to the Company's shareholders, unless one of such officers expressly authorizes disclosure by another employee in advance.

No director, officer or employee may cause the Company to enter into a transaction with the intent to document or record it in a deceptive or unlawful manner. In addition, no director, officer or employee may create any false or artificial documentation or book entry for any transaction entered into by the Company. If you obtain information causing you to believe that the Company's books or records are not being maintained, or that its financial condition or results of operations are not being disclosed, in accordance with these controls and procedures, you must report the matter directly by any of the means indicated in the "Reporting and Enforcement Mechanisms" section below.

Interactions with Government Officials and Healthcare Professionals

The Company does not permit or condone bribes, kickbacks or other improper payments, transfers or receipts. No director, officer or employee should offer, give, solicit or receive any money or other item of value for the purpose of obtaining, retaining or directing business or bestowing or receiving any kind of favored treatment.

Government Officials or Employees

The nature of the Company's business often requires interaction with officials from the U.S. government and various governments around the world. Many countries, including the U.S., have legislation, such as the FCPA, that makes it a crime to bribe government officials and others; in many countries outside of the U.S., healthcare professionals and those associated with research, clinical development and reimbursement of products are frequently also government officials. You should never authorize, offer or pay anything of value, directly or indirectly, to any government official or employee, political party, or candidate for public office for the purpose of obtaining or maintaining business or for any other business advantage. Transactions with government officials and employees are covered by a variety of complex legal rules; you should consult with the Company's legal department to be certain that you are aware of, understand and abide by these rules before taking any action.

Healthcare Professionals

Interactions between the Company and healthcare professionals are heavily regulated in the United States and in many other countries. The Company is committed to compliance with all applicable U.S. federal and state laws such as the Federal Anti-Kickback Statute, the Stark Law, state anti-kickback laws and false claims laws and any applicable non-U.S. laws. You must comply with the Company's healthcare compliance policies. In addition, the Company will take care to contractually obligate any third-party agents or consultants performing services on its behalf to act in accordance with applicable law.

Political Contributions

Corporate contributions to political campaigns are strictly regulated by federal, state, provincial and local law in the U.S. and many other jurisdictions. Accordingly, all political contributions proposed to be made with the Company's funds must be coordinated through and approved by members of the Company's executive management team.

Directors, officers and employees may make personal political contributions, but should not represent that they are making contributions on the Company's behalf. Specific questions related to political contributions should be directed to the Company's Policy and Government Relations department.

REPORTING AND ENFORCEMENT MECHANISMS

Among your most important responsibilities to the Company are the obligations to (i) comply with this Code and all applicable laws, rules and regulations, and (ii) report any situation or conduct you believe may constitute a possible violation of this Code or applicable laws, rules or regulations.

If you learn of a potential or suspected violation of this Code, you have an obligation to report the relevant information to one of the persons listed below:

- a supervisor;
- the Company's Chief Compliance Officer or their designee;
- the Company's Chief Legal Officer; or
- the Audit and Risk Committee of the Board (the "Audit and Risk Committee") and/or the Nominating and Corporate Governance Committee.

Frequently, a supervisor or department head will be in the best position to resolve the issue quickly. However, you may also raise any question or concern with any of the other persons listed above.

If the issue or concern relates to a potential or suspected violation of this Code or any U.S. federal laws, including securities laws, the FCPA, applicable bribery laws, internal accounting

controls of the Company or any auditing matter, or any other applicable law, you may report it orally or in writing confidentially (and for employees based in the United States, anonymously), to any member of the Audit and Risk Committee, any member of the Nominating and Corporate Governance Committee or the Chief Compliance Officer, pursuant to the Company policy entitled “Procedures for Reporting Financial and Compliance Matters; No Retaliation Policy”, which is available on ARC and on the Corporate Governance page of the Investors section of the Company’s website.

Nothing in this Code or in any other Company policies prohibits you from reporting possible violations of applicable laws, rules or regulations to any governmental agency or entity or making other disclosures that are protected under the whistleblower provisions of federal, state, national or local laws or regulations. In addition, no agreement between the Company and any employee should be construed to prohibit any such reporting.

POLICY AGAINST RETALIATION

The Company will not tolerate retaliation in any form against any person who in good faith reports suspected violations of this Code or applicable laws, rules or regulations, voices other ethical concerns, or who is involved on the Company’s behalf in investigating or helping to resolve any such issue. Anyone found to have retaliated against another employee for any such conduct may be subject to discipline, up to and including termination of employment. If you believe that you have been subjected to retaliation, you should report the situation as soon as possible to your supervisor or to the Chief Compliance Officer.

PENALTIES FOR VIOLATIONS

The Company is committed to taking prompt and consistent action in response to violations of this Code or applicable laws, rules or regulations. Any person who violates this Code or applicable laws, rules or regulations is subject to disciplinary action, up to and including termination of employment. The Company will promptly investigate reports of suspected violations. It will evaluate suspected violations on a case-by-case basis and apply an appropriate sanction including, in its sole discretion, reporting the violation to a government authority if and as appropriate.

WAIVER/AMENDMENTS

Only the Board may waive application of any provision of this Code, and the Board has delegated day-to-day responsibility for such waivers and day-to-day administration of this Code to the Chief Compliance Officer. Any request for such a waiver should be submitted in writing to the Chief Compliance Officer or the Board for its consideration.

The Nominating and Corporate Governance Committee shall review the adequacy of this Code from time to time and shall, to the extent deemed advisable or appropriate, recommend that the Board approve and adopt amendments to this Code. The Company will promptly disclose to shareholders, by means of a filing with the SEC or by posting on the Company’s website, all substantive amendments to this Code as well as any waivers of this Code granted to directors or officers, including the reasons for any such waivers, in either case within five business days of the grant of any such waiver or the effective date of such amendment.