

Reporting Financial and Compliance Matters; No Retaliation Policy (Whistleblower Policy)

Alkermes plc (the “Company” or “Alkermes”) is committed to conducting its business ethically and legally, to producing transparent and accurate financial statements, and to fostering a workplace environment conducive to open discussions of business ethics, compliance and practices. The purpose of this policy (this “Policy”) is to outline procedures for reporting suspected wrongdoing and to make clear that the Company will not tolerate retaliation against anyone who reports or otherwise raises concerns of suspected wrongdoing in good faith.

Scope

This Policy applies to everyone at Alkermes, specifically to all employees, officers, contractors, interns, secondees, temporary employees and former employees of Alkermes plc and its subsidiaries and the members of the board of directors of Alkermes plc (the “Board”), as well as any person considered a “worker” under the Irish Protected Disclosures Act 2014 (together, “Alkermes Individuals”).

This Policy outlines the Company’s established procedures for:

1. the confidential and/or anonymous good faith submission of complaints or concerns regarding questionable accounting or auditing matters, potential violations of the Company’s Code of Business Conduct and Ethics or other Company policies, or activities or behaviors that are illegal or that have violated, or may violate, any laws applicable to the Company; and
2. the receipt, retention and treatment of complaints or concerns received by the Company regarding the Company’s accounting, internal accounting controls or auditing matters or any actual or potential violations of the Company’s Code of Business Conduct and Ethics, other Company policies or any laws applicable to the Company.

What to Report

All Alkermes Individuals should promptly report the relevant details of any known, suspected, or likely wrongdoing, which may include:

- Concerns regarding the Company’s financial reporting, accounting practices, internal accounting controls, or auditing matters;
- Violation of Company policies, including the Alkermes plc Code of Business Conduct and Ethics;
- Violation of any law applicable to the Company (see ‘What laws apply to the Company?’ below);
- Threat to an individual’s health or safety;
- Breach of fiduciary duty or failure to comply with a legal obligation (other than employment contracts);
- Environmental damage;
- Misuse of public funds or resources;
- Miscarriage of justice;
- Oppressive, discriminatory or negligent behavior by a public body; or
- Concealing or destroying evidence of wrongdoing.

What laws apply to the Company?

Applicable laws include, but are not limited to, the Irish Criminal Justice (Corruption Offences) Act 2018, the Irish Protected Disclosures Act 2014, the U.S. False Claims Act, the U.S. Defend Trade Secrets Act, the U.S. Antikickback Statute, the U.S. Foreign Corrupt Practices Act, U.S. federal and state securities laws, and other laws of the United States, Ireland and the European Union.

Do you have a question or personal grievance?

This Policy and its reporting procedures are for reporting suspected wrongdoing or retaliation. If you instead have a question about the right thing to do, please contact the Alkermes Legal or Compliance departments. If you believe you have been mistreated or have a personal grievance to report, please contact the Alkermes Human Resources department.

How to Report

Reports may be made through any one of the following channels:

1. To one's manager;
2. To the Alkermes Corporate Governance and Compliance Hotline;
3. To the Chief Legal Officer and Chief Compliance Officer or their designee(s);
4. To the Audit and Risk Committee of the Board; or
5. To the Nominating and Corporate Governance Committee of the Board

Reporting Contacts

Alkermes Corporate Governance and Compliance Hotline

- For U.S.-based Alkermes Individuals:
1-800-704-4487
- For Ireland-based Alkermes Individuals:
1-800-851-387
- alkermes.ethicspoint.com

David Gaffin, Chief Legal Officer and Chief Compliance Officer

- +1-781-609-6577
- David.Gaffin@alkermes.com

Chair of the Board's Audit and Risk Committee and/or Chair of the Board's Nominating and Corporate Governance Committee

- +1-781-609-6348
- Corporate.governance@alkermes.com

What to Include

Reports submitted under this Policy should include specific information to enable a thorough investigation. Whenever possible, a report should include the following: when and where the issue occurred; whether the issue is ongoing; what the issue consisted of; who was/is involved in the issue; and whether the issue has been brought to the attention of anyone at Alkermes.

Confidentiality

Any report submitted through the Alkermes Corporate Governance and Compliance Hotline (phone or webform) may be submitted anonymously.

The identity of the person making a report, the substance of the report, the findings of any investigation and the identities of anyone referred to in a report as associated with suspected wrongdoing will be kept confidential to the fullest extent possible depending on the method of reporting and consistent with the need to conduct an adequate investigation and take appropriate corrective action, except where disclosure may be required or permitted by law.

After Receiving a Report

Any Alkermes Individual who receives a report under this Policy must promptly notify the Chief Legal Officer and Chief Compliance Officer, or their designee(s).

Any Board committee Chair who receives a report must promptly notify the Chief Legal Officer and the other members of their committee within a reasonable period of time, but in no event later than the next regularly scheduled meeting of such committee and/or meeting of the full Board, whichever occurs first.

Attachment I to this Policy outlines the investigatory, evaluation, and retention processes to be followed in response to any submitted report. Attachment II contains further information with respect to reports from Alkermes Individuals based in Ireland.



No Retaliation / Unfair Treatment

Alkermes has a strict policy against retaliation. Alkermes prohibits retaliation against any person acting in good faith who:

- Submits a report following this Policy;
- Voices other ethical concerns related to the Company;
- Participates in any investigation or remediation of, or proceeding related to, reported wrongdoing;
- Discloses information to an appropriate government or law enforcement agency that they reasonably believe either demonstrates a possible violation of law or is otherwise a protected disclosure under U.S., Irish or EU law;
- Discloses a trade secret in confidence to a government official or attorney solely for the purpose of reporting or investigating a suspected violation of law, or in a filing submitted under seal in a lawsuit or other proceeding (see [Attachment III](#) for additional information);
- Files a complaint or report covered by the U.S. Sarbanes-Oxley Act of 2002 or the U.S. Dodd-Frank Act;
or
- Attempts to stop a violation of, or bring suit under, the U.S. False Claims Act.

If an Alkermes Individual believes that they have been retaliated against in violation of this Policy, they should promptly notify their manager or the Chief Legal Officer and Chief Compliance Officer. If the Company determines that retaliation has occurred, it will take appropriate corrective action and/or disciplinary action, up to and including termination of the offender.

Notwithstanding the foregoing, an Alkermes Individual who files a report or provides evidence which they know to be false or without reasonable belief in the truth and accuracy of such information will not be protected by the above policy statement and may in appropriate cases be subject to disciplinary action.

All Protected Disclosures Permitted

Nothing in this Policy or in any other Alkermes policy prohibits Alkermes Individuals from reporting possible violations of applicable law, rules, or regulations to any governmental agency or entity, or making other disclosures that are protected under federal, state, national or local laws or regulations in the United States, Ireland, or any other applicable jurisdiction. No agreement or arrangement between Alkermes and any Alkermes Individual should be interpreted as prohibiting or otherwise impeding any such protected reporting or disclosures.

Amendments

The Audit and Risk Committee of the Board and/or the Nominating and Corporate Governance Committee of the Board shall review the adequacy of this Policy from time to time and shall consider and, to the extent deemed advisable or appropriate, recommend that the Board approve and adopt, any amendments to this Policy.

Evaluation, Investigatory and Retention Processes (Common)

Investigation and Evaluation Process

Any report regarding accounting, internal accounting controls or auditing matters will be brought to the attention of the Chair of the Board's Audit and Risk Committee, and the treatment or response to such report shall be handled or supervised by the Audit and Risk Committee.

The person(s) directed by a Board committee Chair or the Chief Legal Officer and Chief Compliance Officer to investigate a report shall:

- evaluate the report as to gravity and credibility;
- initiate an informal inquiry or a formal investigation with respect to the report's allegations;
- summarize the results of such inquiry or investigation, including recommendations as to the disposition of such matter;
- make the results of such inquiry or investigation, including any recommended corrective or disciplinary action, available to the applicable Board committee for further action, as appropriate; and
- recommend changes to any Company policies or procedures necessary or desirable to prevent further similar violations or behaviors.

For all other reports, the Chief Legal Officer and Chief Compliance Officer and/or the Board committee Chair who received the report shall determine who will investigate. Such investigations will follow the steps outlined above or other applicable investigatory procedures maintained by the Company, as applicable.

Retention Process

The evaluation process followed and/or actions taken in response to a report shall be documented in the records of the applicable investigating person or committee and provided to the Chief Legal Officer and Chief Compliance Officer. The Chief Legal Officer and Chief Compliance Officer shall retain copies or records of all reports and all related documentation, in each case for a period of not less than seven years from the end of the year during which the complaint was received, the first two years in an easily accessible place. In no event shall any such copies or records be destroyed without the prior approval of (i) the Chair of the Audit and Risk Committee and (ii) the Chief Legal Officer and Chief Compliance Officer, independent counsel to the Audit and Risk Committee and/or counsel to the Company, as appropriate, in each case after considering the effect and applicability of the provisions of 18 U.S.C., Chapter 73, Sections 1512(c) and 1519, as enacted pursuant to the Sarbanes-Oxley Act of 2002 and, for Irish operations, section 17 of the Irish Criminal Justice Act 2011 and section 51 of the Criminal Justice (Theft and Fraud Offences) Act 2001.

Attachment II

Evaluation, Investigatory and Retention Processes (Reports from Ireland-based Alkermes Individuals)

Any reports under this Policy from Ireland-based Alkermes Individuals will be handled in compliance with the Protected Disclosures Act 2014, as amended (the “2014 Act”). In respect of such reports, the following provisions apply:

- The reporting person will be sent an acknowledgement of receipt, in writing, not more than 7 days after receipt.
- The Company will designate an impartial person who is competent to follow-up on the report (a “designated person”) who will maintain communication with the reporting person and, where necessary, request further information from, and provide feedback to, that reporting person.
- The designated person will diligently follow-up on the report, to include conducting an initial assessment of whether there is “prima facie” (preliminary) evidence that a relevant wrongdoing may have occurred.
- If the designated person decides that there is no prima facie evidence that a relevant wrongdoing may have occurred, the designated person may close the procedure or, where appropriate, refer the reporting person to other workplace procedures (for example, the grievance procedure). In such cases, the designated person will notify the reporting person, in writing, as soon as practicable, of the decision and the reasons for it.
- If the designated person decides that there is prima facie evidence that a relevant wrongdoing may have occurred, the Company will take appropriate action to address the relevant wrongdoing, with due regard for the nature and seriousness of the matter.
- The designated person will provide feedback to the reporting person within a reasonable period, defined for purposes of this Policy as within three (3) months of the date the report was received. The reporting person may also request, in writing, further feedback at intervals of three (3) months until such time as the procedure relating to the report concerned is closed.
- The Company accepts anonymous reports from Ireland-based Alkermes Individuals on the same conditions as other reports, although the Company’s ability to follow-up with an anonymous reporting person may be impeded by their anonymity. To facilitate follow-up under the 2014 Act, the Company encourages all Ireland-based Alkermes Individuals to include their name and contact details with any reports.
- The Company will comply with the provisions related to protection of the identity of the reporting person as set out in section 16 of the 2014 Act (subject to the exceptions in that section).
- Ireland-based Alkermes Individuals are also entitled to make a report to the Protected Disclosures Commissioner and any relevant regulators and/or relevant institutions, bodies, offices or agencies of the European Union. The procedures for doing so are set out in the 2014 Act, and related statutory instruments.

Attachment III

U.S. employees are notified of the following under applicable U.S. law:

1) Under the Defend Trade Secrets Act (DTSA):

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

(2) Use of Trade Secret Information in Anti-Retaliation Lawsuit—An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual (A) files any document containing the trade secret under seal; and (B) does not disclose the trade secret, except pursuant to court order.

2) Nothing contained in any agreement with the Company, or any Company policy, limits an employee's ability, with or without notice to the Company, to: (i) file a charge or complaint with any U.S. federal, state or local governmental agency or commission (a "Government Agency"), including without limitation, the U.S. Equal Employment Opportunity Commission, the U.S. National Labor Relations Board or the U.S. Securities and Exchange Commission (the "SEC"); (ii) communicate with any Government Agency or otherwise participate in any investigation or proceeding that may be conducted by any Government Agency, including by providing non-privileged documents or information; (iii) exercise any rights under Section 7 of the National Labor Relations Act, which are available to non-supervisory employees, including assisting co-workers with or discussing any employment issue as part of engaging in concerted activities for the purpose of mutual aid or protection; (iv) discuss or disclose information about unlawful acts in the workplace, such as harassment or discrimination or any other conduct that an employee has reason to believe is unlawful; or (v) testify truthfully in a legal proceeding. Any such communications and disclosures must not violate applicable law and the information disclosed must not have been obtained through a communication that was subject to the attorney-client privilege (unless disclosure of that information would otherwise be permitted consistent with such privilege or applicable law). If a Government Agency or any other third party pursues any claim on an employee's behalf, and if the employee has signed a release of claims with the Company, the employee will not have any right to monetary or other individualized relief (either individually or as part of any collective or class action), but the Company will not limit any right the employee may have to receive an award pursuant to the whistleblower provisions of any applicable law or regulation for providing information to the SEC or any other Government Agency.