

# ALKERMES PLC CODE OF BUSINESS CONDUCT AND ETHICS

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# LETTER FROM OUR CEO



Colleagues,

At Alkermes, we have an unwavering dedication to people living with complex psychiatric and neurological disorders. We are deeply committed to building trust with our communities and the patients who take our medicines, and to conducting ourselves in a responsible and ethical manner.

This Code of Business Conduct and Ethics reflects our shared commitment to ethical behavior, compliance and accountability. It captures our pledge to conduct business with integrity, to comply with all applicable laws and regulations and to uphold high ethical standards in all interactions with our business partners, healthcare professionals, the communities we serve and, importantly, each other.

Please take the time to familiarize yourself with this document and continue to integrate its principles into your daily work activities. If you need further guidance or have any questions, please contact our Legal or Compliance departments.

Thank you for consistently embodying our values in your work. Together, we will continue to maintain our culture and high standards of integrity and ethics and to remain a trusted and reliable leader in the biopharmaceutical industry.

Best regards,

A handwritten signature in black ink, appearing to read 'Richard F. Pops'.

Richard F. Pops  
Chief Executive Officer



## OUR PURPOSE & VALUES

Our core values and our commitment to helping improve the lives of people living with complex psychiatric and neurological disorders guide and define our culture.

With collaboration at our core, we strive to value every person and respect each voice.

We are beyond passionate. Our commitment to our employees and the many people and communities we serve keeps us moving forward every day.

## SECTION 1

# SCOPE AND OBJECTIVES

This Code of Business Conduct and Ethics (this “Code”) applies to the members of the board of directors of Alkermes plc (the “Board”) and all officers and employees of Alkermes plc and its subsidiaries (“Alkermes” or the “Company”).

This Code outlines the core legal and ethical principles that guide our work and conduct so we may pursue our Purpose and follow our Values with honesty and integrity.



## Alkermes adopted this Code to promote:

- Honest and ethical conduct, including the ethical handling of actual, potential or apparent conflicts of interest;
- Full, fair, accurate, timely, and understandable disclosures in reports and documents that Alkermes files with, or submits to, the United States Securities and Exchange Commission and in Alkermes’ other public communications;
- Compliance with applicable laws, rules and regulations;
- Prompt internal reporting of any suspected or actual violations of this Code or applicable law (see the sections entitled ‘Reporting Suspected Violations’ and ‘No Retaliation,’ below);
- Accountability for adherence to this Code;
- Deterrence of wrongdoing in all forms.



Alkermes has cultivated and seeks to uphold a culture of compliance with all applicable laws, rules and regulations, and of ethical business conduct.

Maintaining our culture of integrity and compliance requires your active and ongoing commitment to follow and adhere to this Code. At all times, you are expected to use good judgment in seeking to comply with this Code and with all applicable laws, rules and regulations. You should report suspected or actual violations of this Code or of applicable laws, rules and regulations; the Company will then take appropriate steps to investigate.

This Code is not a comprehensive manual that covers every situation you might encounter or that describes every Alkermes

policy or procedure. This Code is also not intended to define completely, or in any way reduce or limit, the obligations you may have to Alkermes as an employee, officer or director. Instead, this Code should be viewed as establishing the minimum standards of conduct that Alkermes expects all employees, officers and directors to comply with when conducting Alkermes business.

If you have any questions about the requirements of this Code, or about how you should conduct yourself in a particular situation, you should consult your manager or a member of the Legal or Compliance teams for guidance. For contact information, please see the Legal & Compliance page on ARC, Alkermes' internal website.

# UNWAVERING COMMITMENT

We work with an Unwavering Commitment to fulfill our Purpose. We are committed to following the law, acting ethically and upholding our duties to the Company and its stakeholders.

## SECTION 2

# REPORTING AND ENFORCEMENT MECHANISMS

### Reporting Suspected Violations

If you learn of a potential or suspected violation of this Code or any applicable laws or regulations, you should promptly report the relevant information to one of the following people:

- Your manager;
- Alkermes' Chief Compliance Officer or his designee;
- Alkermes' Chief Legal Officer;
- Alkermes' Corporate Governance and Compliance Hotline; or
- Any member of the Audit and Risk Committee and/or the Nominating and Corporate Governance Committee of the Board.

**Alkermes' Corporate Governance and Compliance Hotline is available 24 hours a day, 7 days a week.**

**Reports may be made anonymously.**

**United States: 1-800-704-4487**

**Ireland: 1-800-851-387**

**[alkermes.ethicspoint.com](http://alkermes.ethicspoint.com)**

For more information about reporting potential, suspected or actual violations to the Chief Compliance Officer or members of the Audit and Risk Committee or Nominating and Corporate Governance Committee, please see the Company policy entitled, '[Reporting Financial and Compliance Matters; No Retaliation Policy \(Whistleblower Policy\)](#)' 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 Alkermes 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 federal, state, national or local laws or regulations in the United States, Ireland or any other applicable jurisdiction. No agreement or arrangement between you and Alkermes should be interpreted as prohibiting or otherwise impeding any such protected reporting or disclosures.

## No Retaliation

Alkermes encourages reports of known or suspected wrongdoing by following a strict policy against retaliation. Alkermes prohibits retaliation against any person acting in good faith who:

- Reports suspected violations of this Code or applicable laws, rules or regulations;
- Voices other ethical concerns related to the Company; or
- Participates in any investigation or remediation of, or proceeding related to, reported wrongdoing.

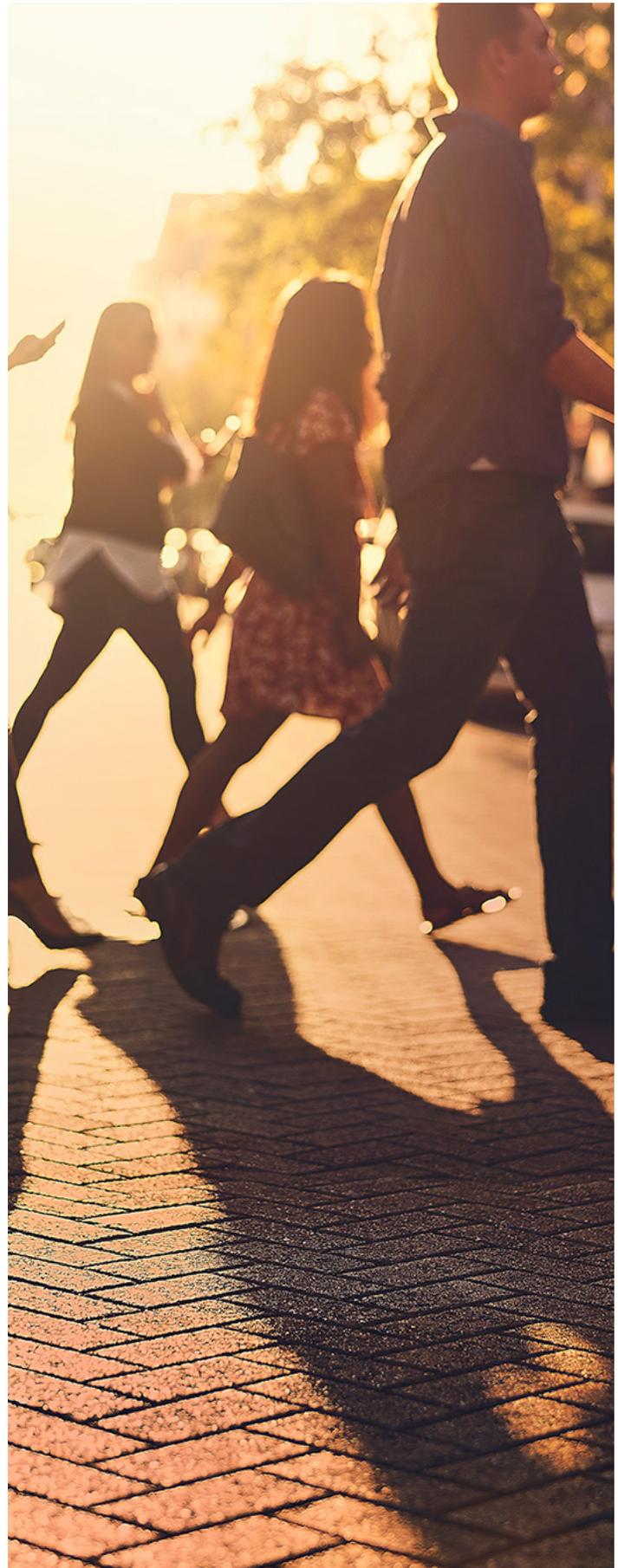
Anyone found to have retaliated against another employee for any such actions may be subject to disciplinary action, up to and including termination of employment.

If you believe that you have experienced retaliation, you should promptly notify your manager or the Chief Legal Officer and Chief Compliance Officer, David Gaffin.

## Penalties for Violations

Alkermes 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 will be subject to disciplinary action, up to and including termination of employment.

Alkermes will promptly investigate and evaluate reports of suspected or actual violations on a case-by-case basis and, if necessary, will take appropriate follow-up action including, in its sole discretion, reporting to a government authority if and as appropriate.



## SECTION 3

# STANDARDS OF CONDUCT

### Conflicts of Interest

You must ensure that all your financial, business and other activities outside of work do not conflict with your responsibilities to Alkermes.

A conflict of interest may exist when your private interest interferes, or even appears to interfere, with Alkermes' interests. Conflicts of interest may also arise when you (or your family member) receive a personal benefit (whether improper or not) because of your position at Alkermes.

You must promptly disclose any matter that you believe might raise doubt regarding your ability to act objectively and in Alkermes' best interest.

Examples of situations involving potential or actual conflicts of interest that you must disclose include, but are not limited to, the following:

- Employment by, consulting for, serving as an officer or director of, or owning a substantial interest in any business or organization that is currently or is expected to become a competitor, customer, supplier, business partner or collaborator of Alkermes;
- Directing Alkermes business to any business or organization in which you or your family member has a substantial interest;
- Using Alkermes' 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 organization that does or seeks to do business with Alkermes;
- Serving as an officer or director of any not-for-profit entity that has a business relationship with Alkermes or that conducts activities related to the therapeutic areas of any Alkermes marketed or investigational product.



## CONFLICT OF INTEREST EXAMPLES:

### • IF YOU...

- \*are employed by,
- \*consult for,
- \*serve as an officer or director of, or
- \*own a substantial interest in...

### • ...ANY ALKERMES

- \*competitor,
- \*customer,
- \*supplier,
- \*business partner or
- \*collaborator...

### • ...YOU MUST DISCLOSE

this actual, potential or apparent conflict of interest.

Employees (other than officers) must promptly disclose any actual, potential or apparent conflict situation to their manager or department head, or to the Chief Compliance Officer or their designee. All managers and department heads who receive such reports must forward them promptly to the Chief Compliance Officer or their designee.

Directors, officers and the Company Secretary shall promptly disclose any actual, potential or apparent conflict situation to the Chief Compliance Officer or to the Nominating and Corporate Governance Committee of the Board. Actual, potential or apparent conflicts of interest involving the Chief Compliance Officer should be disclosed to the Chief Executive Officer and/or the Nominating and Corporate Governance Committee. In addition, as required by Irish law, directors must declare any actual, potential or apparent conflicts of interests to the Board as soon as they become aware of such actual, potential or apparent conflict.

You must obtain approval before undertaking any activity that might involve an actual or potential conflict of interest. Employees (other than officers) must obtain approval from the Chief Compliance Officer or their designee. For directors and officers, approval must be obtained from the Nominating and Corporate Governance Committee.

If you have received approval for an outside activity that might involve a conflict of interest, you must promptly notify the Chief Compliance Officer of any significant change in your role in that activity or in your relationship with the outside individual or entity, or in the nature of such outside individual or entity's relationship with Alkermes (e.g., if an outside company you are affiliated with later becomes a supplier for or competitor to Alkermes).

## Corporate Opportunities

As a director, officer or employee, you owe a duty to Alkermes to advance its legitimate interests. If you learn of a business opportunity through your position with Alkermes or through use of company property, you may not take that opportunity for yourself or any third party with which you are affiliated, unless Alkermes has already been presented with, and rejected, such opportunity. You also may not use company property, information or your position with Alkermes for improper personal gain (whether direct or indirect) or to compete with Alkermes.

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

## Protection and Proper Use of Company Assets

You must protect and seek to ensure the proper use of Alkermes' assets, property and information. You should protect against the improper disclosure, theft, or misuse of Alkermes' intellectual and physical property and other assets.

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

## Insider Trading Policy

You are subject to, and must abide by, the [Alkermes plc Insider Trading Policy](#), a copy of which is available on ARC and on the Corporate Governance page of the Investors section of Alkermes' website, and any other related policies or procedures that Alkermes 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 Alkermes, its customers, suppliers, business partners or collaborators, except when disclosure of such information is authorized by Alkermes or legally required.

**Q:** What is considered confidential information under this Code?

**A:** Confidential information includes all non-public, proprietary and sensitive information concerning Alkermes' business (or the business of its customers, suppliers, business partners or collaborators).

Whenever you are working with confidential or other sensitive business information, you should take appropriate precautions to ensure that it is shared only with authorized individuals who need to know such information to perform their responsibilities for the Company. You may use confidential information only for legitimate business purposes.

You must return all Alkermes confidential and/or proprietary information in your possession to Alkermes when your employment or other service relationship with the Company terminates. This obligation is in addition to the requirements set forth in any confidentiality agreement that you may have entered into with Alkermes.

**Q:** What is considered a trade secret?

**A:** All forms and types of information that Alkermes has taken reasonable measures to keep secret, where such information derives economic value from not being known to, or legitimately discoverable by, another person who can obtain economic value from the disclosure or use of the information.

For clarity, it is not a violation of this Code to disclose a trade secret to a federal, state, or local government official, or to an attorney, for the sole purpose of reporting or investigating a suspected violation of law. It is also not a violation of this Code to reference trade

secrets in a complaint or other document filed in a lawsuit or other official proceeding, provided the filing is made under seal.

## Full, Fair, Accurate, Timely and Understandable Disclosures

We strive to ensure that all business records and financial reports are accurate, complete, understandable, and not misleading. We are committed to complying with applicable laws requiring the full, fair, accurate, timely and understandable disclosure of material information and ensuring the accuracy of information disseminated publicly. To that end, Alkermes maintains internal controls and procedures designed to provide reasonable assurance of the safeguarding and proper management of Alkermes' assets; the reliability of its financial reporting in compliance with generally accepted accounting principles; and compliance with applicable laws and regulations.

Alkermes 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.

You may not cause Alkermes to enter into a transaction with the intent to document or record the transaction in a deceptive or unlawful manner. You may not create any false or artificial documentation or book entry for any transaction entered into by Alkermes.

If you obtain information causing you to believe that Alkermes' 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 method described in the section entitled 'Reporting Suspected Violations' above.

## External Inquiries and Company Statements

The information Alkermes shares with the public must be truthful, accurate and clear. Only certain officers and employees in the Corporate Affairs, Investor Relations and Legal departments are authorized to make statements on behalf of Alkermes and to disclose non-public information about Alkermes to the public, members of the investment community (including analysts), or to Alkermes shareholders. You must refer all media inquiries to the Corporate Affairs team and all investor inquiries to the Investor Relations team.

## Compliance with Laws, Rules and Regulations

We are committed to complying with all applicable laws, rules and regulations. Alkermes has adopted a comprehensive compliance program based on guidance from the United States Department of Health and Human Services Office of the Inspector General.

In addition to this Code, Alkermes also maintains separate, detailed policies regarding compliance with legal and regulatory requirements that that can be obtained on ARC, through Alkermes' Learning Management System (ComplianceWire), through the Human Resources department or through the Chief Compliance Officer.

All new Alkermes employees are trained on policies and procedures relevant to their role, including compliance with this Code and information on how to report any concerns. Additional refresher and update training is routinely given to employees covering issues relevant to Alkermes' industry and workplace.

## Ethical Conduct and Fair Dealing

In addition to following the law, which is always required, you must also act fairly, honestly, ethically and in good faith when conducting business on behalf of Alkermes. 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. Questions or concerns about, or reports of, compliance issues should be raised by any of the means described in the above section entitled 'Reporting and Enforcement Mechanisms'.

## Anti-Bribery and Anti-Corruption

Alkermes has a policy of zero tolerance for bribery and corruption. You are prohibited from offering, giving, soliciting or receiving any type of bribe, kickback or other improper payment or transfer of value.

You must never offer, give, solicit or receive any money or other item of value for the purpose of obtaining, retaining or directing any business advantage or other kind of favored treatment.

Alkermes' policy is to comply fully with all applicable anti-bribery and anti-corruption laws, including but not limited to the Anti-Kickback Statute and the Foreign Corrupt Practices Act in the United States and the Criminal Justice (Corrupt Offenses) Act 2018 in Ireland.

In addition to this Code, Alkermes' Healthcare Compliance policies and procedures, which can be found on ARC and are assigned as role-based training through Alkermes' Learning Management System, contain additional provisions and controls pertaining to anti-bribery and anti-corruption.

**Q:** What is a bribe or kickback?

**A:** Anything of value offered or paid to influence an individual to corruptly take any action for purposes of obtaining or retaining a business advantage.

**“ANYTHING OF VALUE” IS BROADLY DEFINED.**

**IT CAN INCLUDE, BUT IS NOT LIMITED TO, THE FOLLOWING:**

- Cash or equivalents
- Lodging
- Consulting opportunities
- Gifts
- Employment
- Business opportunities
- Travel
- Internships
- Political donations
- Meals
- Debt forgiveness
- Charitable donations

## Government Officials or Employees

Alkermes' business often requires interactions with government officials in the United States and other countries. Transactions with government officials and government employees are covered by a variety of complex legal rules; you should consult with Alkermes' Legal or Compliance teams to be certain that you are aware of, understand and comply with these rules before interacting with government officials.

### Q: Who is a government official?

**A:** Any officer or employee of a government, government agency, state-owned enterprise, political party, or public international organization (e.g., World Health Organization). Additionally, candidates for public office and family and close associates of government officials should also be treated as though they were government officials themselves.

**NOTE:** In many countries, healthcare professionals and others involved with research, clinical development and reimbursement or access to medicines qualify as government officials.

Consistent with the Company's prohibition on all forms of bribery, you must never authorize, offer or pay anything of value, directly or indirectly, to any government official, as such term is broadly defined above, for the purpose of obtaining or maintaining business. You must follow all Alkermes policies and procedures governing transfers of value to government officials.

## Healthcare Professionals

Interactions between life science companies and healthcare professionals are heavily regulated in the United States and in many other countries. Alkermes is committed to compliance with all applicable laws, including but not limited to the federal Anti-Kickback Statute, the Stark Law, state anti-kickback laws, false claims laws and the federal Food, Drug, and Cosmetic Act, as well as applicable non-U.S. laws.

You must not authorize, offer or pay anything of value, directly or indirectly, to a healthcare professional or anyone else for the purposes of inducing or rewarding prescriptions, referrals, or any other type of business advantage. You must follow all Alkermes policies and procedures governing transfers of value to healthcare professionals.

## International Trade Controls

We must comply with all laws and regulations governing our business activities that cross international borders, including import and export controls, embargoes and economic sanctions. These restrictions can be complex and may change suddenly in response to global events. You should always consult the Legal department and Global Trade Compliance team (AskGTC@alkermes.com) for guidance on international transactions, research and other business activities.

## Political Contributions

Corporate contributions to political campaigns are strictly regulated by federal, state and local law in the United States and many other jurisdictions. Accordingly, all political

contributions made with Alkermes' funds must be coordinated through and approved by members of Alkermes' executive management team. Questions regarding corporate political contributions should be directed to the Policy & Government Relations team.

You may make personal political contributions, but you must never represent or otherwise suggest that you are making such contributions or otherwise acting on Alkermes' behalf.

## Antitrust

You must comply with the antitrust, unfair competition and trade regulation laws of Ireland, the United States and any other jurisdiction in which Alkermes conducts business activities.

You are not allowed to discuss with competitors, directly or indirectly, sensitive business information such as pricing and costs, or the terms or conditions of third-party arrangements. You are also prohibited from allocating customers or markets or taking any other action that unfairly restricts trade or competition.

## Product Promotion

Promotional communications regarding Alkermes' products must be truthful, accurate, non-misleading, fairly balanced and consistent with the prescribing information approved by the relevant health authority. All promotional materials and messaging must be reviewed and approved in advance by Alkermes' Copy Clearance Committee.

## Safety Reporting

All employees must report any adverse events or product complaints involving Alkermes products immediately (within 1 business day), in accordance with the internal procedure titled 'Adverse Event and Product Complaint Reporting for Alkermes Employees' (110-02979), which is available on the Company's internal website. Adverse events and product complaints can come from anywhere, including personal communications outside of work, news accounts, social media and published reports of scientific studies. Employees must timely report adverse events and product complaints from any source, regardless of whether the event is believed to be caused by the product or whether the event is described as a potential side effect in the prescribing information for the product.

### HOW TO REPORT ADVERSE EVENTS OR PRODUCT COMPLAINTS:

 **Fax:** +1 844-FAX-ALKS  
(+1-844-329-2557)

 **Email:** [medinfo@alkermes.com](mailto:medinfo@alkermes.com)

 **Phone:** 1-888-235-8008

## Research Integrity

We hold ourselves to the highest standards of scientific integrity and ethics and comply with all applicable laws, regulations and industry guidelines governing the conduct of research and the integrity of scientific data, including, but not limited to, Good Laboratory Practice (GLP) and Good Clinical Practice (GCP).

As a patient-focused organization, Alkermes values the people who volunteer to participate in our research studies. Alkermes maintains policies, procedures and practices that are respectful of each study participant and designed to protect their health, safety and well-being. Our research activities are designed to comply with all laws and regulations of the jurisdiction where the research takes place. We also follow all requirements for the protection of study participants set for our studies by institutional review boards or ethics committees.

We adhere to internationally recognized standards for the care, welfare and treatment of research animals, and conduct all animal research in compliance with applicable local, national or international laws.

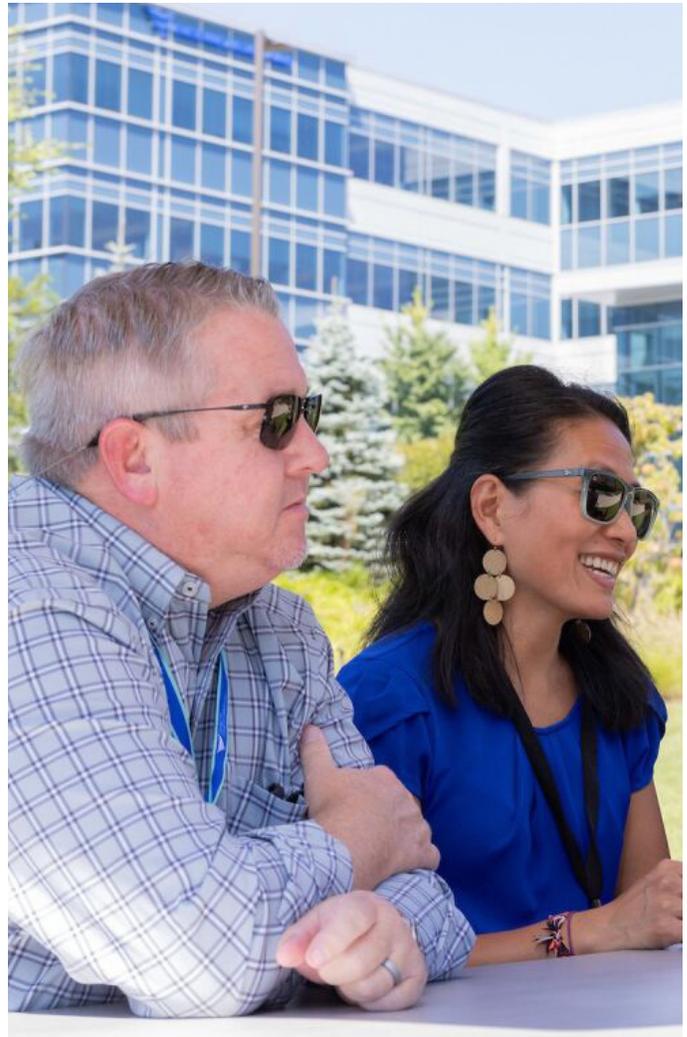
## Interactions with Patients

Patients are central to the Company's mission of researching, developing and commercializing new medicines that address the needs of people suffering from complex medical conditions. Depending on your role at Alkermes, you may have opportunities to interact with patients in certain settings, in which case you may be provided additional Alkermes-led training. When interacting with patients, you must never provide any medical advice or otherwise interfere with their relationships with their healthcare professionals, and you must always act with honesty and integrity.

If your role involves handling information about patients or research participants, you must protect the confidentiality and privacy of such information in accordance with Alkermes' confidentiality and privacy policies and procedures.

## Quality Systems

Our manufacturing activities are governed by the Alkermes Quality Management System (QMS), a comprehensive program covering the entire lifecycle of the products that we manufacture from development to commercialization, and inclusive of the full supply chain associated with each stage of manufacture. The QMS is designed to ensure compliance with current "good practice" quality standards (GxP), product specifications and applicable regulations. All employees involved in our manufacturing activities receive comprehensive training tailored to their role and are required to follow the QMS and related policies and procedures.



# COLLABORATION AT OUR CORE

We work with Collaboration at Our Core, marshalling the insights and contributions of professionals, experts, patients and communities to support the advancement of neuroscience. Collaboration requires the robust exchange of ideas and is enabled by our commitment to confidentiality, privacy, the safety of our workplace and selecting business partners who share our values.

## Information Security and Privacy

We are committed to maintaining effective oversight of the security of all personal data and other sensitive information in our possession to protect Alkermes' and third-parties' confidential business information and the privacy of patients, employees, partners and other stakeholders. Our Information Security Management System is a key element of our information security program. It is designed to identify, assess, help mitigate and monitor information technology risks across the organization, including information security risks. Our global data privacy compliance program is designed to promote compliance with the European Union's General Data Protection Regulation (GDPR), the Health Insurance Portability and Accountability Act of 1996, as amended (HIPAA), and other applicable laws and regulations, such as the California Consumer Privacy Act (CCPA).

You should always treat the personal data of individuals as highly confidential. You may only use or access such data for legitimate business purposes and must follow all Alkermes' policies and procedures regarding the storage, handling, retention and access of such data.

## Environmental Health, Safety and Security (EHSS)

We are committed to operating in a manner that protects our employees, our environment and our communities. We have adopted EHSS policies, procedures and practices to manage risks proactively and raise awareness of our environmental impacts.

## ALKERMES' CORE EHSS GOALS:

- Preserve and protect the health, safety and well-being of our employees;
- Meet or exceed applicable environmental, health and safety regulations and statutory obligations for the regions in which we operate;
- Protect the environment and promote sustainability in our operations; and
- Secure our infrastructure and support the manufacture and supply of our medicines for patients.

## Vendors and Suppliers

We seek to do business with vendors and suppliers that share our commitment to ethical business practices and corporate responsibility and sustainability. Our [Supplier Code of Conduct](#), which outlines our expectations for the suppliers with which we do business, is available on ARC and on the Suppliers page of the Responsibility section of the Company's website.

We have established sourcing and vendor management processes to assure that vendors and suppliers are operating in compliance with all applicable laws, rules and regulations. When dealing with vendors and suppliers, you must always act fairly and ethically, with honesty and integrity, and follow all Alkermes' policies and procedures regarding vendor retention, onboarding, management and oversight.

## Human Rights

We strive to uphold human rights in all our business activities and support the principles of the United Nations Universal Declaration of Human Rights. Among other things, we believe that everyone has the right to life, liberty and security of their person, and we steadfastly oppose slavery, servitude, human trafficking, forced labor and child labor. Our [Human Rights Policy](#) is available on ARC and on the Corporate Responsibility section of the Responsibility page of the Company's website.



# RESPECT EACH VOICE

We Respect Each Voice, value diversity and do not tolerate discrimination, harassment and retaliation. We seek to nurture a creative and inclusive workplace culture in which employees have access to resources and support that can help them thrive personally and professionally.

## Our People

Alkermes is committed to fostering a culture of inclusion and belonging. Our objective is to create a workplace where all employees feel valued and respected. Alkermes is an equal opportunity employer and is fundamentally committed to creating and maintaining a work environment in which employees are treated with respect and dignity. We make decisions regarding hiring, promotion, compensation, benefits and termination in collaboration with the Human Resources department, in accordance with the principle of equal employment opportunity and other legitimate criteria and without regard to protected characteristics.

## Protected Characteristics

Protected characteristics include the following attributes protected by law: race, color, religion, sex, sexual orientation, gender expression or identity, ethnicity, national origin, ancestry, age, mental or physical disability, genetic information, any Veteran status, any military status or application for military service or membership in any other category protected by applicable law.



## No Discrimination, Harassment or Retaliation

We are committed to creating and maintaining a work environment in which employees are treated fairly, with dignity and respect. We strictly prohibit and do not tolerate discrimination, harassment or retaliation.

- Discrimination is treating someone differently, or denying or granting them a benefit, because of a protected characteristic (see above).
- Harassment is any unwelcome conduct that shows hostility toward someone, that unreasonably interferes with their work performance, or that creates a hostile or offensive work environment because of a protected characteristic (see above).
- Retaliation is any adverse action taken against someone who reports, opposes or helps investigate discrimination or harassment.

If you believe you have experienced discrimination, harassment or retaliation, or know of someone who has, contact Human Resources for support and assistance.



## Waiver and 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 to 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.

Alkermes will promptly disclose to shareholders, by means of a filing with the United States Securities and Exchange Commission 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 (5) business days of the grant of any such waiver or the effective date of such amendment.



