



# Code of Business Conduct and Ethics

*Always Doing Business The Right Way*

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## Our Vision and Values: A Message from Our Chief Executive Officer

Dear Beam Team,

At Beam, our vision is to provide life-long cures for patients suffering with serious diseases. We are guided in this vision by a core set of values:

- We are a community of **fearless innovators**.
- We are **rigorous and honest** in our research.
- We listen with **open minds**.
- We are **committed** to each other.

With this vision and these values comes the responsibility to uphold the highest standards of integrity and to ensure our actions align with all applicable laws and regulations. "Always Doing Business the Right Way" is not just a principle; it is essential to our success.

Our Code of Business Conduct and Ethics ("Code") serves as a guide to help us understand the standards we are expected to uphold. It enables us to maintain the trust and credibility we have earned with patients, healthcare providers, business partners and shareholders worldwide. This Code represents our collective commitment—to each other, to our company and, most importantly, to the patients we serve—to adhere to the highest standards of ethics and accountability.

If ever in doubt about the appropriate course of action, it is essential to seek guidance. If you have concerns regarding compliance, speak up. The Code provides direction on where to seek assistance and offers guidance on how to raise questions or concerns related to compliance.

Remember, Beam's integrity begins with each of us, and conducting business ethically is fundamental to preserving our culture and reputation. Please read the Code carefully and ensure you follow its guidance at all times. We all share the responsibility to uphold the values of honesty, quality, and integrity that the Code enshrines.

Thank you for your dedication and commitment.

Sincerely,

John Evans  
Chief Executive Officer

## Understanding Our Responsibilities

### Adherence to the Code

The Code applies to all employees, officers and directors, each of whom must adhere to its provisions, including the provisions requiring the reporting of suspected violations. Certain business partners, such as agents, consultants, distributors, suppliers, vendors, independent contractors and temporary employees are also expected to live up to the principles of the Code. Managers who supervise our external business partners are responsible for ensuring that they understand our standards.

### Reading and Understanding the Code

The most current version of the Code is available on the Beam HR Link website. The Code will be provided to each new employee, officer and director at the beginning of his or her relationship with Beam and on an annual basis thereafter. Each employee, officer and director shall certify that he or she has received, read and understood the Code and, for annual certifications, has complied with its terms.

### Company Policies

The Code is not intended to be an exhaustive description of Beam's policies. Beam has adopted policies and procedures addressing certain topics in the Code in more detail and may adopt additional policies from time to time. Our policies and procedures can be found on Beam's HR Link site.

Please contact your manager, Human Resources or Legal with questions about Beam's policies and procedures.

### Asking for Help

The Code cannot directly address every scenario that may arise; therefore, employees are expected to use good judgment and common sense when acting. If you are ever in doubt or have questions about whether a particular activity is consistent with this Code, a company policy or the law, please ask your manager or a representative from Human Resources or Legal before proceeding. While there may not always be a quick or easy answer, it is in the best interests of Beam and all of us to ask for help to ensure that all aspects of a particular decision are considered.

### Reporting Concerns

We greatly value your vigilance in identifying and reporting violations of the Code, company policies or the law. If you have concerns regarding compliance, please speak up. We strongly encourage you to report any suspected violations to:

- Your manager;
- A representative from Human Resources;
- The Chief Legal Officer;
- Beam Compliance Hotline: 855-789-2539
- Portal: <http://www.whistleblowerservices.com/BEAM>

Reports to the Beam Compliance Helpline can be made anonymously if you choose. The helpline is operated by an independent third party contracted by Beam to help ensure anonymity.

Any manager who receives a report of a suspected violation of the Code must immediately inform the Chief Legal Officer, Chief Human Resources Officer or Chief Executive Officer.

## Introduction

The Company's Board of Directors has adopted this Code in order to provide guidance as to the appropriate way to conduct business, deter wrongdoing and promote:

- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submit to, the Securities and Exchange Commission (the "SEC"), and in other public communications made by the Company;
- compliance with applicable governmental laws, rules and regulations;
- the prompt internal reporting of violations of this Code to an appropriate person or persons identified herein; and
- accountability for adherence to the Code.

## Manager Responsibilities

Managers at Beam play an important role in shaping the direction of their team's work and overall experience at the company. Managers are responsible for:

- setting expectations for annual goals, key deliverables and critical competencies;
- providing regular feedback and coaching as part of the overall performance management process;
- serving as a source of company information and providing an open door for feedback; and
- setting an example for their teams by demonstrating our values and competencies.

Managers are also essential in promoting the standards contained in the Code and are often the first point of contact when an employee has a question or concern. Managers are expected to take all employee concerns seriously and create an environment where their teams feel comfortable raising issues. While answers may not be available immediately, managers are expected to listen carefully, to involve Human Resources or Legal as needed, and to take appropriate action to address a concern or question.

Many resources exist to support managers in their roles. Additional information and guidance can be obtained on Beam's HR Link, from your manager or from Human Resources.

## No Retaliation

Beam prohibits retaliation against anyone for reporting, in good faith, a suspected violation of the Code, a company policy or the law. Retaliation in any form against an individual who reports in good faith a suspected violation (even if the report is mistaken), or who assists in the investigation of a reported violation, or who otherwise engages in Permitted Activities (as defined below) is itself a violation of this Code. Acts of retaliation should be reported immediately to your manager, Human Resources or Legal.

## Investigations

Human Resources or Legal will coordinate the investigation of any reports of alleged violations of the Code. You are expected to fully cooperate with any such inquiry or investigation.

## Disciplinary Action

Failure to (1) adhere to the provisions in this section and the following sections of the Code or (2) comply with company policies or with the law may result in disciplinary action up to and including termination of employment.

## Maintaining a Respectful and Safe Work Environment

### Preventing Discrimination and Harassment

Beam embraces people with different backgrounds, experiences, abilities, skills and beliefs. These varying perspectives help our company succeed. Beam is committed to the principles of equal employment, diversity, inclusion and respect.

Beam does not tolerate discrimination against or harassment of anyone who works for or with Beam (including employees, customers and suppliers) on the basis of sex (including pregnancy, childbirth or related medical conditions), race, color, religion, ethnicity, national origin, ancestry, age, physical or mental disability, veteran status, marital status, sexual orientation, gender identity, genetic information or any other basis protected by local, state or federal laws.

If you believe that you or someone else may be the target of discrimination or harassment please report the situation to Human Resources.

### Ensuring Workplace Safety

Beam is committed to ensuring a safe and healthy work environment, free of threats to the health, safety, and well-being of our employees. You are required to comply with Beam's established safety rules and procedures, as well as applicable laws and regulations regarding workplace safety.

You have a responsibility to report any unsafe situations, accidents or injuries whether you are directly involved or are a witness. Please contact Facilities with any questions about workplace safety rules and procedures.

Beam prohibits violence in the workplace. If you believe that you or someone else may be the target of violence or intimidation, or threats of violence or intimidation, please report the situation to Human Resources. The use, sale or possession of weapons in the workplace is also prohibited.

While modest and responsible consumption of alcoholic beverages at business functions and meals is permitted, your judgment, professionalism or physical abilities should never

be impaired by alcohol or drugs when carrying out your job duties in or outside of the office.

Please refer to *Beam's Employee Reference Guide* for more information about Beam's policies on workplace safety.

### Respectful Use of Company Assets

Beam provides employees with tools such as office space, supplies, computers, an internet connection, e-mail and other electronic and physical tools to help us do our jobs comfortably, effectively and efficiently. You are responsible for using these resources in a professional, ethical and lawful manner. While you may use these resources for personal use on a limited basis, personal use should be kept to a minimum and should not interfere with the performance of your job responsibilities.

Beam's electronic systems should never be used to transmit gossip, profanity, vulgarity, material with sexual content or any other material that would be offensive to the average person (e.g., a racial or ethnic slur) or to download or view material from the Internet that is profane, vulgar, sexual, or that would be offensive to the average person. All information stored, transmitted, received, or contained in Beam's electronic systems and devices is Beam's property and should not be considered private. Beam expressly reserves the right to monitor, access and review employee use of Beam's electronic systems and devices (including its Internet connection, e-mail, IM, or voice mail systems, and e-mail or IMs sent or received through personal or web-based accounts). Please refer to Beam's Employee Reference Guide for more information about Beam's policies on electronic systems.

### Preserving Employee Privacy

Beam respects employee privacy and only collects and maintains employees' personal information— such as payroll and medical information— for business purposes. Access to this information is limited to those who need it to perform their jobs and they are required to protect the confidentiality of the information.

Each of us is responsible for maintaining high ethical standards and for adhering to the laws and regulations that are applicable to Beam.

## Doing Business Ethically and Legally

### Avoiding Conflicts of Interest

We should always act in the best interest of Beam and refrain from engaging in any activity or having a personal interest that presents a “conflict of interest”. A conflict of interest occurs when your personal interests (or the interests of your family) interfere with Beam’s interests. Conflicts of interest can arise when you take an action or have an interest that prevents you from performing your job duties and responsibilities honestly, objectively and effectively. Each of us is expected to use good judgment to avoid situations that can lead even to the appearance of a conflict of interest.

For example, you should not:

- perform services as an employee, officer, director, consultant, advisor or in any other capacity for a competitor of Beam, other than any services performed at Beam’s request;

- have a financial interest in a competitor of Beam, other than a financial interest representing less than one percent (1%) of the outstanding shares of a publicly-held company; or
- use your position with Beam to influence a transaction with a supplier or customer in which you have a personal interest, other than a financial interest representing less than one percent (1%) of the outstanding shares of a publicly-held company; or
- conduct business on behalf of the Company with immediate family members.

Beam’s Related Person Transaction Policy requires review and approval of certain transactions, arrangements or relationships with Beam in which any of its executive officers, directors, director nominees or holders of 5% or more of its outstanding stock (or their immediate family members) has a material interest. Please contact Legal with any questions about the Related Person Transaction Policy.

Conflicts of interest can also arise in non-financial situations. For example, real or perceived conflicts of interest can be created by hiring of a family member in your reporting line or function, or by maintaining intimate relationships with employees in your reporting line or function (or in another function with which you work closely).

It is impossible to describe every potential conflict of interest, which is why communication is critical. You are required to disclose any conflict of interest, or anything that could be perceived as a conflict of interest, to your manager and Human Resources so that the situation can be appropriately managed.



## Handling Gifts and Entertainment

The giving or receiving of cash, gifts, entertainment or other benefits by individuals in their capacity as representatives of Beam can create a real or perceived conflict of interest and, in some cases, can violate the law. Neither you nor your family members may accept cash, gifts, entertainment or other benefits from customers, suppliers or anyone doing or seeking to do business with Beam, other than items of insignificant value (such as a small gift basket).

Common sense should prevail when engaging in business entertainment on behalf of Beam. Acceptable entertainment is infrequent, modest, intended to serve legitimate business goals and in compliance with applicable laws.

The sections in the Code titled Interactions with Healthcare Professionals and Relationships with Government Officials and Compliance with Anti-Bribery Laws address special considerations for providing items of value or entertainment to healthcare professionals or government officials, both inside and outside of the U.S.

### Interactions with Healthcare Professionals

In the United States and elsewhere, interactions with healthcare professionals are subject to special laws and stringent oversight. The term "healthcare professional" includes anyone (or any entity) who may be in a position to purchase, prescribe, arrange for or recommend the purchase or prescription of Beam's products.

These laws include the prohibition of kickbacks, or the payment of anything of value (including money, gifts, services, entertainment or other items) made for the purpose of improperly influencing a decision to obtain or retain business. A key purpose of these laws is to protect the independence and objectivity made by healthcare professionals treating patients.

Beam prohibits all kickbacks and improper inducements to healthcare professionals to



prescribe or purchase Beam products. Put simply, we do not "buy business". All interactions with healthcare professionals should be professional in nature and facilitate the exchange of medical or scientific information, with the ultimate goal of benefitting patient care.

Critically, questions about Beam's underlying intent might be raised concerning bona fide payments or transfers of value that may seem common or routine for those with experience in the pharmaceutical industry. These payments or transfers can include the provision of meals in connection with business meetings, fees or "honoraria" associated with a consulting or speaking engagement or educational or research grants. To avoid any actual or perceived kickbacks or inducements, all arrangements with healthcare providers to provide consulting or other services to Beam must be in response to a legitimate business need and set forth in a written agreement, and related payments must not exceed fair market value for the services rendered.

You must consult applicable Beam policies before engaging healthcare professionals to provide services and before providing anything of value to a healthcare professional. Please contact Legal with any questions about interactions with healthcare professionals.

### **Relationships with Government Officials and Compliance with Anti-Bribery Laws**

Beam is committed to compliance with anti-bribery laws wherever it does business, including the U.S. Foreign Corrupt Practices Act and similar laws outside of the U.S., that prohibit the payment of bribes to government officials. Accordingly, Beam prohibits unlawful exchanges of value, including bribes, kickbacks, and other types of payoffs and benefits paid to any healthcare professionals, customers, governmental authorities, suppliers, or any other parties, to influence them to obtain or retain a business advantage.

You are prohibited from making or promising to make, directly or indirectly, any payment of money or anything of value to any government official, political party, or candidate for political office, which is intended to induce or influence that person to act in any way to assist Beam in obtaining or retaining a business advantage.

Beam is committed to working fairly and honestly with government representatives and agents, and to complying with governmental requests and processes. We must all be truthful and straightforward in our dealings with the government and may not direct or encourage another employee or anyone else to provide false or misleading information to any government official. Providing gifts, gratuities, or other favors or items of value to government officials is generally prohibited.

It is important to note that many health care professionals outside of the United States are employees or officials of foreign government agencies and, therefore, are considered "government officials." Thus, we should exercise care and caution in our business interactions with such institutions.

Please contact Legal with any questions about interacting with government officials.

### **Interactions with Patients and Patient Advocates**

At Beam, patients are at the center of everything we do. We are committed to interacting with patients and patient advocates in an appropriate way. You should never provide medical advice to patients and should always refer a patient to his or her physician when medical questions arise.

Interactions with organized patient advocacy groups or individual patient advocates should be conducted with transparency and in a manner structured to ensure their independence. Please contact Patient Advocacy with questions about interacting with patient advocacy groups.

### **Promoting Products**

Beam is committed to the honest and truthful promotion and marketing of its products and to using accurate and well-balanced scientific information in all of its marketing activities. If acting on Beam's behalf in marketing and promotional activities, you must follow Beam's policies and procedures (including its policies on promotional communications) when interacting with healthcare professionals and patients.

When promoting and marketing Beam products, you must:

- always present information that is accurate and balanced, including an accurate statement of safety information which should never be minimized or misrepresented;
- never promote products for unapproved uses;
- conduct promotional activities only with approved materials; and understand the rules governing promotion, including Beam policies and procedures.

You should consult Legal with questions about the proper promotion of Beam's products.

### **Engaging in Personal Political Activities**

Beam supports your right to engage in the political process, including through personal monetary contributions or by volunteering personal time. However, you must conduct any political activities on your own time and with your own resources. In addition, you may not make political contributions on behalf of Beam or suggest that Beam has provided support.

If you have any questions about engaging in political activities please speak with your manager, Human Resources or Legal.

### **Supporting Fair Competition**

Beam must always deal honestly, ethically and fairly with our suppliers, customers, competitors and employees and adhere to all laws designed to promote free trade and fair competition among businesses. These competition laws (also known as anti-trust laws in the United States) prohibit engaging in conduct that interferes with fair competition. This conduct may include, but is not limited to, the following types of agreements or discussions: (i) “price fixing” arrangements; (ii) refraining from competing on bids (“bid rigging”) with competitors; (iii) market division with competitors; or (iv) boycotting or collectively refusing to deal with certain customers, healthcare professionals or vendors.

In addition, you should never threaten to use Beam's potential market position against a third party, boast about “market power,” disparage competing products, or mislead a customer or supplier about a competitor. Although these actions may not necessarily be violations of antitrust laws, they may create an appearance of improper behavior.

Please contact Legal with any questions about whether a particular arrangement complies with competition laws.

### **Understanding Insider Trading Laws**

As a publicly traded company, Beam must adhere to particular standards to ensure compliance with applicable securities laws and the regulations of the Securities and Exchange Commission (SEC) and similar bodies. To help ensure compliance with these laws and regulations, Beam has adopted an Insider Trading Policy.

In the course of your work you may have knowledge of information, whether about Beam or other companies, before that information becomes publicly available to outside investors. While Beam values open communication internally, you must avoid prematurely disclosing any information to outside parties except in connection with Permitted Activities (as defined below). An investor may decide to buy, sell or hold stock based on that non-public information, which is both unethical and illegal.

## **PERSONAL POLITICAL ACTIVITIES MUST BE KEPT SEPARATE FROM WORK**

- Do not make political contributions, directly or indirectly, on behalf of Beam.
- Do not lobby on behalf of Beam without approval from Legal.
- Do not use Beam's name, property, or your job title for personal political activities.
- At work, do not solicit donations or try to persuade others to support political parties or candidates.

Similarly, you may not buy, sell, or engage in any other transaction with respect to any of the securities of Beam (subject to certain exceptions outlined in the Insider Trading Policy) or any other company while in possession of material, non-public information about Beam or such other company. Doing so is both unethical and illegal. Material information is any information that a reasonable investor would consider important in making an investment decision.

You must also refrain from providing non-public Beam information to people outside of Beam who may trade on the basis of that information (a practice referred to as “tipping”) unless it serves a legitimate business purpose and the disclosure of such information has been properly authorized and appropriate confidentiality protections are in place.

These topics are addressed in more detail in the Insider Trading Policy. If you have any questions about whether a proposed purchase or sale of Beam or any other company’s securities might be a violation, or any questions about the Insider Trading Policy, please consult Legal.

### WHAT IS INSIDER TRADING?

Placing stock trades based on non-public, material information.

Providing non-public Beam information to anyone outside Beam without a legitimate business purpose, proper authorization and appropriate confidentiality protections.

### Financial Integrity

As a public company, Beam has an obligation to provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with or submitted to the SEC and in other public communications.

We are all responsible for honestly and accurately reporting all business transactions. All books, records and accounts must be maintained according to all applicable regulations and standards and must accurately reflect the true nature of the transactions they record. Beam's financial statements must conform to generally accepted accounting rules established by Beam's accounting policies. The making of any false, misleading or artificial entries on any Beam business record including, but not limited to, financial reports, test reports and time reports, is strictly prohibited.

If you have questions about Beam's accounting, internal accounting controls or auditing processes, please contact Finance or Legal.

### Dealing with Independent Auditors

You must always make truthful, complete and accurate statements regarding any audit, review or examination of Beam's financial statements or the preparation or filing of any document or report with the SEC. It is prohibited to (directly or indirectly) coerce, manipulate, mislead or fraudulently influence any independent public or certified public accountant conducting an audit or review of Beam's financial statements.

## Maintaining Records

You are required to follow all applicable policies and procedures regarding the creation, maintenance, access rights, storage and destruction of Beam's business records. Beam will retain records for as long as they are required and in the manner required to meet legal, regulatory, administrative and operational requirements. If it should ever become apparent that records of any type will be required in connection with a lawsuit or government investigation, all relevant records should be preserved, and ordinary disposal or alteration of records pertaining to the subject of the litigation or investigation should be suspended. If you ever have any questions about whether particular records under your control should be preserved because they might relate to a lawsuit or government investigation, please contact Legal.



As part of our commitment to the well-being of patients, *Beam* is committed to developing and manufacturing the highest quality products in accordance with Good Clinical Practices, Good Manufacturing Practices and applicable laws. *Beam* has a continuing responsibility to review information that it learns about its products and to report safety information, including certain information relating adverse events and quality complaints, to applicable regulatory authorities.

## Demonstrating Our Commitment to Safety and Quality

### Scientific Integrity

Research integrity is fundamental to the scientific process and to *Beam*'s ability to bring novel products to market. All *Beam* research and development must be conducted according to all applicable laws and regulations, authorship rules, reporting requirements, and the generally accepted ethical standards of the scientific community. Scientific misconduct, such as fabrication, falsification, or plagiarism in proposing, conducting, or reporting research, disregards the intellectual contributions and property of others, impedes the progress of research, and corrupts the scientific record. It is prohibited.

### Clinical Research

*Beam* is proud of its efforts to help patients through clinical research. To ensure adherence with all laws, regulations and our own commitment to patients, *Beam* follows all review and approval procedures required by applicable laws and regulations before initiating clinical research. *Beam* protects patient safety and well-being through appropriate informed consent procedures and Good Clinical Practices.

### Reporting Safety Events

In accordance with applicable *Beam* policies, you must report adverse and other safety events within 24 hours of receipt of information about the event, even if you are not sure whether there is a cause and effect relationship between the use of the product and the event. Reports should be made to Medical Safety and Risk Management or any other contacts listed in applicable *Beam* policies.

An adverse event is any untoward medical occurrence, including any unfavorable or unintended sign, symptom or disease, in a patient or clinical trial subject who uses a *Beam* product. Other safety events can include when someone:

- experiences a lack of effect from a medication;
- misuses or abuses a medication;
- is exposed to a medication during pregnancy or lactation; or
- dies after exposure to a medication.

### Reporting Product Complaints

In accordance with applicable *Beam* policies, you are responsible for reporting product complaints to within 24 hours of receipt of information about a product complaint. Reports should be made to Quality Assurance or any other contacts listed in applicable *Beam* policies.

Product complaints are written, verbal or electronic communications that suggest deficiencies related to the safety, identity, strength, purity or quality of a *Beam* product, including its packaging or labeling.

Information is an especially important asset to *Beam*. How we communicate – and refrain from communicating – about *Beam's* proprietary and confidential information and the information of others is critical to maintaining our competitive advantage and to meeting our legal obligations.

## Communicating About Beam and Our Work

### Handling Confidential and Proprietary Information

We each have an obligation to maintain the privacy and security of Beam's confidential and proprietary information.

Confidential information is information that Beam considers private and that is not common knowledge outside Beam, such as Beam's business strategy, future plans, financial information, contracts, personnel information, technical or scientific information about current or future research or other information that Beam deems confidential.

Proprietary information is information that Beam owns, develops, pays to have developed, or to which it has an exclusive right. Maintaining the confidentiality of confidential and proprietary information is vital to Beam's ability to achieve success and maintain its competitive position in the industry.

We must all maintain the confidentiality of confidential information that is related to Beam or other companies, including our suppliers and customers, except when disclosure is authorized by a supervisor or legally permitted in connection with Permitted Activities (as defined below). Unauthorized disclosure of any confidential information is prohibited. Except in connection with Permitted Activities, you must not share proprietary information with anyone not entitled to know for a legitimate business reason; this includes fellow employees, spouses, other family members, and friends. You are also required to maintain the confidentiality of Beam's intellectual

property, which includes, but may not be limited to, any patents, trademarks, copyrights, and use of rights licensed by others.

To avoid inadvertent disclosure of any confidential or proprietary information, you should avoid discussions of Beam information in public places, such as elevators, public transportation or in restaurants. Any access to confidential or proprietary information given to a third party for a legitimate business reason must be provided under a confidentiality agreement approved by Legal.

The obligation to protect Beam's confidential and proprietary information continues on and off company premises, and during and after employment with Beam.

If you have any questions about whether something is proprietary or confidential, please contact Legal.

### Protecting Customer and Patient Privacy

We have a responsibility to protect sensitive personal information gathered from employees and individuals with whom we work, including consumers, healthcare professionals, clinical trial subjects and patients. This information should be collected only for legitimate business purposes and access should be restricted on an "as needed" basis. Employees responsible for the collection and storage of such information should take appropriate precautions to safeguard personal information.

### **Communicating with External Parties**

Only those individuals who are officially authorized to speak as representatives of Beam may speak with the media, investors and analysts on behalf of the company. Those authorized individuals include the CEO, CFO, SVP Business Development and Strategy or any other person approved by an authorized individual.

Individuals who are not specifically authorized to speak on behalf of Beam must not give the impression that they are speaking on behalf of the company through any communication channels that are public or may become public. Such communication channels include, but are not limited to, social media sites, online forums, blogs, chat rooms, websites, discussions with journalists (including from trade publications) and letters to the editor.

If you are not authorized to speak on behalf of Beam and you are contacted by a member of the media or by an investor or analyst, please refer the inquiry to the Head of Investor and Public Relations. Please also let the Head of Investor and Public Relations know if you plan to participate in any trade conferences, interviews for trade articles or similar activities where your role at Beam may be mentioned.

### **Waivers and Other Matters**

All employees, officers and directors are obliged to follow the provisions of the Code. Generally, waivers will not be granted and exceptions will be made only for good cause. Any waiver for a director or executive officer must be approved by the Board of Directors. Any waiver for any other employee must be approved by the Head of Legal. Any waivers will be disclosed as may be required by law.

Beam reserves the right to amend, alter or terminate this Code at any time for any reason. The most current version of the Code can be found in the Human Resources Policies section of Beam's Intranet site.

The Code is not an employment contract between Beam and any of its officers, employees or directors.

## Reminder about Reporting Importance and Resources

Please remember that an issue cannot be addressed unless it is brought to someone's attention.

We greatly value your vigilance in identifying and reporting violations of the Code, company policies or the law. If you have a question about what to do in a certain situation, or if you suspect any illegal or unethical behavior, please speak up. We strongly encourage you to contact:

- Your manager;
- A representative from Human Resources;
- The Chief Legal Officer;
- Beam Compliance Hotline: 855-789-2539
- Portal: <https://www.whistleblowerservices.com/BEAM>.

Reports to the Beam Compliance Helpline can be made anonymously if you choose. The helpline is operated by an independent third party contracted by Beam to help ensure anonymity. Any manager who receives a report of a suspected violation of the Code must immediately inform the Chief Legal Officer, Chief Human Resources Officer or Chief Executive Officer.

While Beam desires to address matters internally, no provision of the Code or of any other agreement or Company Policy prohibits or restricts you from (i) communicating with government agencies without notice to or approval from Beam, including but not limited to the Securities and Exchange Commission, the Equal Employment Opportunity Commission, or similar state or local agencies or to any legislative

body or self-regulatory organization (each, a "Government Entity") about possible or actual violations of the law, or otherwise providing information to a Government Entity, filing a charge or complaint with a Government Entity, or participating, testifying, or otherwise assisting in Government Entity investigations or proceedings without notice to or approval from Beam, or (ii) making disclosures or communications to engage in protected, concerted activity or otherwise exercising rights under Section 7 of the National Labor Relations Act (each, a "Permitted Activity"). Additionally, nothing in the Code or any other agreement or Company policy limits an employee's, officer's, or director's right to receive an award from any Government Entity for or in connection with information provided to the Government Entity.

Beam will not discharge, demote, suspend, threaten, harass, or in any other manner discriminate or retaliate against an employee because the employee has reported a suspected violation of law or this Code internally or engaged in a Permitted Activity. However, if a report is made with knowledge that it was false, Beam may take appropriate disciplinary action against the employee, up to and including termination.

## Thank You

Thank you for taking the time to read and understand Beam's Code of Business Conduct and Ethics. By living our values and by undertaking the shared responsibilities described in the Code, we all contribute to Beam's ultimate mission to help patients and their families.



# Questions?

Please contact Chris Bellon at [CBellon@beamtx.com](mailto:CBellon@beamtx.com).