



Anti-Bribery and Anti-Corruption Policy

GLOBAL BLOOD THERAPEUTICS, INC.

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Anti-Bribery and Anti-Corruption Policy

Leadership Message

A message from the Chief Legal Officer



Hope, Science, Community, what drives us as a company should also be a guideline for our daily business conduct.

We conduct business with integrity and no business result is ever worth sacrificing our values and reputation.

We base our relationships on trust, transparency, and accountability. We prohibit bribery in all business dealings, in every country around the world, with governments and the private sector.

Building trust with our stakeholders and the communities we serve is essential for achieving our goals. We have no tolerance for corruption—it’s against the law and everything GBT stands for.

Thank you,

*Tricia Suvari
Chief Legal Officer*

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GBT Helpline:

www.gbthelpline.ethicspoint.com

1-844-527-2814

compliance@gbt.com

Why It Matters

Global Blood Therapeutics, Inc. (“GBT” or “Company”) is committed to conducting business ethically and in compliance with applicable Anti-Bribery and Anti-Corruption (“ABAC”) laws and prohibiting all forms of bribery and corruption.

Corruption violates the public’s trust, threatens development, and endangers fair trade. Trust and confidence of our various stakeholders across the globe are key for the success of our company, products, and mission. We base our business relationships on trust, transparency, and accountability.

This ABAC policy (this “Policy”) builds on our Code of Business Conduct and Ethics and provides additional guidance to ensure that GBT personnel (as defined below) do not knowingly or unknowingly compromise Company values regarding anti-bribery and anti-corruption. This Policy is designed to facilitate compliance with all applicable ABAC laws and regulations and ensure consistent treatment of ABAC risks throughout GBT, and personnel must abide by the requirements set forth in this Policy.

This Policy applies to the Company’s directors, officers, employees, and contractors (collectively referred to as GBT Personnel).

Roles and Responsibilities

GBT’s Responsibility

As a United States headquartered company conducting business around the world, GBT, its subsidiaries and its affiliates (collectively and individually referred to as GBT or the Company) must comply with the U.S. Foreign Corrupt Practices Act, 1977 (“FCPA”), as well as all applicable United States and non-U.S. ABAC laws, such as the UK Bribery Act.

Global Legal and Compliance Teams:

- ✓ The Company’s Chief Legal Officer has been appointed to serve as the Compliance Officer responsible for providing guidance and interpretation on matters related to this Policy. As used throughout this Policy, all references to the Compliance Officer shall include the Chief Legal Officer and his/her designee(s).
- ✓ Provide advice and guidance on questions of appropriateness or concerns regarding compliance.
- ✓ Educate internal and external stakeholders regarding potential ABAC risks and raise awareness of the topic.
- ✓ Perform due diligence of new or potential business partners based on their specific risk profile.
- ✓ Monitor the Company’s operations to ensure that business is conducted in accordance with this Policy and applicable laws.

GBT Personnel:

- ✓ Review and understand this Policy.
- ✓ Participate in trainings and complete necessary due diligence.
- ✓ Perform interactions with third parties and government officials with caution, and in accordance with this Policy and applicable laws.
- ✓ Know your third-party business partners; ensure that they are properly reviewed; and understand when and what approvals are required for specific third parties.
- ✓ Speak up and report violations or any potential red flags.

Prohibition against Bribery and Corruption

We have a simple rule about corruption: GBT does not make improper payments or act corruptly.

- An **improper payment** or **bribe** is any payment or anything of value offered or provided to influence a decision or to obtain an unfair business advantage. The mere offer or promise of a payment can represent a violation.
- Anything of **value** includes items such as cash, products, services, bonuses, gifts, offers of travel/hospitality/entertainment, favors, trainings, discounts or credits, speaker fees, research agreements, charitable contributions, political contributions, loans, scholarships, offers of employment, or any other type of preferential benefit. Under most jurisdictions there is no minimum threshold or materiality requirement for corrupt payments.
- An act is **corrupt** if it is performed to secure an improper business advantage, either by paying a bribe or through other means.

This Policy prohibits improper payments to, including bribery of, both government officials and private persons including relatives, friends, or colleagues of a private person or of a government official. This includes hiring relatives of a government official to influence the official's decision making.

Non-exhaustive examples of bribes or improper payments include:

- a. Offering, authorizing, or making a payment of something of value to a government official in order to receive or renew a license or permit or to obtain an approval that the Company needs to continue business.
- b. Offering, authorizing, or making a payment of something of value to a government official that is intended to influence implementation of a law that is beneficial to the company's business or to influence the repeal of a law that is adverse to the Company's business.
- c. Offering, authorizing, or making a payment of something of value to a government official in exchange for overlooking or forgiving a regulatory compliance mistake or violation.
- d. Offering, authorizing, or making a payment of something of value to government officials intended to influence actions and decisions that would help the Company to win a deal or to prevent the Company from losing a product approval or sale.
- e. Agreeing to award a contract or bid to, or to purchase products or services from, a company in exchange for a personal benefit.
- f. Offering, authorizing, or making a payment of something of value to health care professionals that is not in compliance with the GBT Code of Conduct, the GBT Healthcare Compliance Policy Handbook, or the EU Compliance Compendium (together, "GBT HCC Policies").
- g. Offering a payment to the buying agent of another company to secure an advantage over competing businesses.

For additional improper payment considerations, please see Appendix 1 of this Policy.

Interactions with Government Officials

All GBT Personnel must conduct interactions with government officials with caution.

The term **Government officials** is defined broadly to include any elected official or employee of any government, individual or entities that are acting on behalf of any government, political parties and party officials, public international organizations, and candidates for political office, or any company or entity owned or controlled by or acting on behalf of any of the above - even if that person is not employed by the government (such as a government consultant).

Health care professionals, including but not limited to physicians, nurses, and clinical trial coordinators (“HCPs”), employed by public institutions are also considered government officials.

Examples of government officials that GBT Personnel may interact with:

- Employees and agents of regulatory authorities or tax authorities;
- Customs brokers;
- Inspectors from a tax, health, or environmental agency;
- Health care professionals (including nurses) employed at a state-owned hospital;
- Professors or researchers at state or other government-owned universities;
- Legislators;
- Elected officials of local, state, province, or national governments;
- Honorary officials (who are typically not compensated, such as honorary members of chambers or members of royal families holding administrative positions) who can influence the award of business;
- Journalists employed by state-owned media; and
- Businesspersons who are acting for and on behalf of any government entity.

GBT prohibits Facilitation Payments (as defined below) of any kind.

Facilitation Payments are small payments made mostly to low-level government officials for the purpose of securing or expediting the performance of a routine, nondiscretionary government action. An example is the expediting of the issuance of permits as long as the Company meets all permit requirements under local rules and regulations. While such payments may be permissible under the laws of certain jurisdictions, they are, nonetheless, strictly prohibited pursuant to this Policy.

Dealings with Third Parties

Third parties can expose GBT to corruption risks, particularly when those third parties are likely to interact with government officials on GBT’s behalf. Examples of third parties that GBT may interact with include:

- Distributors and sub-distributors;
- Customs brokers;
- Logistics providers;
- Legal and regulatory consultants;
- Clinical research organizations;
- Clinical investigative sites;
- Contract manufacturers; and
- Travel agents.

GBT may be liable for the actions of third parties that are working on our behalf. We must perform due diligence and work with responsible partners.

GBT has developed a global, risk-based due diligence program to address third-party risk. As part of this program, GBT Personnel need to take certain steps – depending on the profile and services performed by the third party – to ensure that we understand any potential bribery and corruption risk factors that could be associated with a third party.

Before entering into a new relationship with any type of third party, GBT Personnel must review GBT’s Third-Party Policy to understand the specific requirements.

Reasonable and Bona Fide Business Expenses

Payments for reasonable and bona fide incurred business expenses are permitted if such payments are directly related to a promotion, demonstration, or education about the Company’s products and services, or the negotiation, execution, or performance of a contract with a foreign government or agency of a foreign government. This includes travel and lodging expenses. However, act with extreme caution when making such payments and consider the following points:

- Do not extend any invitation for travel to any government official, government employee, or political party, official, or candidate for political office, unless it is specifically allowed according to GBT HCC Policies, without the prior approval of the Compliance Officer.
- Any travel or entertainment expenses must be “reasonable” and limited solely to those individuals necessary for the furtherance of the Company’s business. Such expenses must also be incurred. GBT Personnel cannot pay or promise to pay any travel or entertainment expenses for spouses or guests of your invitees. GBT HCC Policies include requirements and procedures, including such expenses, that need to be followed when dealing with HCPs.
- All travel and entertainment expenses must be accurately and adequately documented in the books and records of the Company. If such expenses are incurred by contractors or other third parties acting on behalf of GBT, they should maintain a record and provide supporting documentation on request of GBT, which should include the purpose, beneficiaries, and value of such expenses incurred.
- Gifts and tokens of appreciation of nominal value are permitted only if they are given openly and transparently, infrequently, and as permitted under local laws. Such gifts or tokens of appreciation should not be offered for any improper purposes. Please also consider any specific local regulations regarding gifts for HCPs.
- It is the obligation of GBT personnel to ensure that a payment qualifies as a “reasonable and bona fide expense.” In case of questions, consult with the Company’s Compliance Officer.

Charitable and Political Donations

While donations to charitable organizations, as well as support provided to education and research initiatives, grants, and sponsorships, ordinarily are regarded as good corporate citizenship, those made to organizations in which government officials possess a role, such as trustee, cause concern under global anti-corruption laws if the intent is to influence such government officials. Similarly, many countries have taken the position that a donation made to a charitable organization at the request of and/or to obtain goodwill from a government official may be considered a benefit for that official. Before making any donation to a charity associated with a government official, refer to the GBT HCC Policies on “GRANTS, CHARITABLE CONTRIBUTIONS, AND SPONSORSHIPS” for detailed guidance regarding the approval and funding processes.

Numerous U.S. federal, state, and local laws regulate activities of GBT, our affiliates, our GBT Personnel and third parties with regard to political contributions, fundraising and volunteer work, seeking or holding public office, and lobbying. Failure to comply with these laws could result in a legal violation, civil or criminal penalties, and reputational risk for GBT Personnel and intermediaries.

GBT Personnel may not use the Company's funds for political contributions of any kind to any political candidate or holder of any national, state, provincial or local government office. GBT Personnel may make personal contributions but should not represent that he or she is making any such contribution on the Company's behalf. Specific questions should be directed to the Compliance Officer.

It is never permissible for GBT personnel to provide a political contribution to improperly influence a government official or in exchange for any improper favor or benefit.

For clarity on who is considered a government official, refer to the sections above.

Books, Records, and Internal Controls

Detailed and accurate records and internal controls are required by many anti-corruption laws. All GBT Personnel and third-party representatives must keep detailed and accurate records of its business transactions and in particular any payments to government officials. There is no knowledge or intent requirement and there is no "materiality" threshold for these requirements. Accordingly, even a small misstatement or false record-keeping can give rise to liability.

- ✓ False, incomplete, or misleading entries or records may not be created.
- ✓ Any undisclosed or unrecorded corporate funds for miscellaneous expenses may not be maintained.
- ✓ Vague accounting descriptions like "advertising" or "promotional costs" without further explanation will raise red flags and could implicate the record-keeping provisions of applicable anti-bribery and anti-corruption laws.

For additional guidance regarding the requirements for the accuracy of records, please refer to GBT's Code of Business Conduct and Ethics.

Additionally, any third-party conducting business on GBT's behalf must maintain a record and provide supporting documentation on request of GBT, which should include the purpose, beneficiaries, and value of such transactions.

Penalties

Failure to comply with the FCPA and similar anti-bribery and anti-corruption laws, including the UK Bribery Act, may result in civil and/or criminal fines to the Company, as well as significant harm to the Company's reputation. Such a failure may also result in civil and criminal penalties being imposed against the GBT Personnel or third-party representatives involved. Failure by GBT Personnel to comply with this Policy may also result in disciplinary action being taken by the Company.

Seeking Guidance and Reporting Concerns

Each of us has an obligation to ask questions or raise concerns if we believe that misconduct may have occurred, or if GBT Personnel or a third party acting on behalf of GBT has potentially acted in violation of this Policy, our Code of Business Conduct and Ethics, or applicable laws. Appendix 1 includes a list of red flags for potential acts of bribery and corruption.

If you have a question or concern regarding compliance with this Policy, GBT encourages contacting your team leader, another business leader, or the Compliance Officer.

Additionally, GBT encourages GBT Personnel to ask questions or raise concerns using the **Ethos Helpline**. You may contact the GBT Ethos Helpline directly, and anonymously, by web, telephone, or writing:

- ✓ GBT’s “Ethos Helpline” online – www.gbthelpline.ethicspoint.com;
- ✓ GBT’s “Ethos Helpline” by phone – 1-844-527-2814; or
- ✓ In writing – addressed to ABAC Policy Concerns, c/o Chairperson of the Audit Committee, Global Blood Therapeutics, Inc., 181 Oyster Point Boulevard, South San Francisco, CA 94080.

If you are using the GBT Ethos Helpline to report a specific concern or incident, you may be asked to provide your knowledge of the incident, who may be involved, and why you believe the incident occurred, in order for GBT to conduct a thorough evaluation and take appropriate action.

Anti-Retaliation

GBT management has a responsibility to create an environment where GBT Personnel feel comfortable raising questions and concerns without fear of retaliation.

GBT does not tolerate retaliation against anyone who, acting in good faith on the basis of a reasonable belief, reports suspected misconduct or who cooperates in a review. Under no circumstances shall the good faith reporting of any suspected violation serve as a basis for any retaliatory actions to be taken against any GBT Personnel making the report.

Individuals engaging in any type of retaliatory conduct will be subject to disciplinary action, up to and including termination. If you believe someone has retaliated against you or against someone else, please raise a concern immediately. GBT Personnel that believe to be subject to retaliation should immediately raise a concern using the GBT Ethos Helpline or contacting the GBT Compliance Officer directly.

ADOPTED: December 19, 2018

AMENDED: December 10, 2020 EFFECTIVE: January 1, 2021

AMENDED: December 15, 2021; EFFECTIVE: January 1, 2022

Appendix 1 - Red Flags

Below are examples of “red flags” that may require further inquiry to ensure that improper payments in violation of Company policy or applicable law are not being directed to government officials:

- ✓ Requests for commissions that are unusually large in relation to the work to be performed.
- ✓ References to “special accommodations” that have to be made with local officials or statements that you should not ask too many questions about how business gets done in the local jurisdiction.
- ✓ Hesitation on the part of a third party acting on behalf of GBT to provide the details of the services to be performed and statements that he or she will “do what it takes to get the deal done” in the local jurisdiction.
- ✓ Requests for “up front” or advance payments when such payments are not expressly required by a written business agreement.
- ✓ Requests for payment to an offshore bank account, in cash, in a different name, to a shell corporation, to an account in a different country, through private payment procedures, or to an unrelated third-party.
- ✓ Refusal by a prospective third party to comply with the Company’s applicable compliance policies (including this Policy) and/or to comply with all applicable laws (including the FCPA).
- ✓ Refusal to submit to or respond to the Company’s due diligence requests without a reasonable explanation.
- ✓ Refusal by a third party to provide reasonable documentation to support their activities.
- ✓ Family or business relationships between a third party acting on behalf of GBT and government officials.
- ✓ Requests by government officials that specific parties be engaged to provide services or materials to the Company.
- ✓ The entity or any of its owners, directors, officers, or employees have been suspended from doing business, or charged with, convicted of, or alleged to have been engaged in fraud, bribery, misrepresentation, money laundering, gray marketing, export violations and/or any other criminal act.
- ✓ The entity or individual balks at signing off on ABAC language or agreements.
- ✓ The entity or individual is the subject of credible rumors or press reports regarding inappropriate payments or potentially corrupt behavior.
- ✓ The entity or individual lacks experience, qualifications, facilities, resources, or adequate staff to perform the services offered.
- ✓ The entity or individual refuses to disclose his/her/its ownership, principals, parent, or subsidiary companies, agents, or partners.
- ✓ The entity or individual requests payment in cash, advance or partial payment immediately prior to a procurement decision, or an increase in compensation for a specific deal or transaction.
- ✓ The entity or individual requests to create or use any false or inaccurate documentation related to an actual transaction.
- ✓ The entity or individual requests extraordinary or poorly defined last-minute expenses or changes.
- ✓ The entity or individual proposes to retain an agent or another reseller or service provider who would perform similar functions, or who does not appear to be qualified or add reasonable value.