



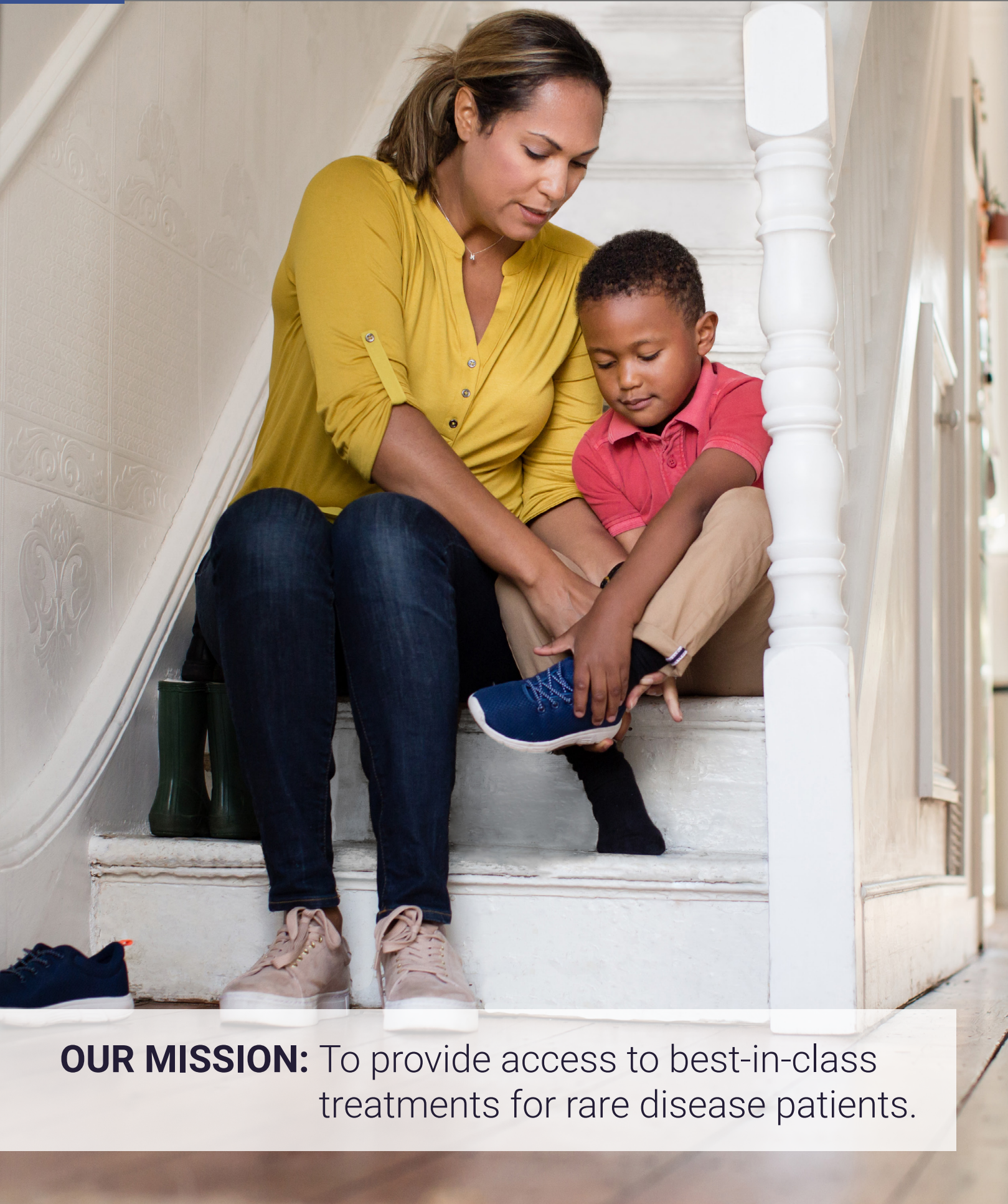
# CODE OF BUSINESS CONDUCT AND ETHICS

REVISED NOVEMBER 2022



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**OUR MISSION:** To provide access to best-in-class treatments for rare disease patients.

**OUR MISSION** is to provide access to best-in-class treatments for rare disease patients. This mission underpins our focus on the discovery, development and global commercialization of clinically differentiated medicines that provide benefits to patients with rare disorders. Our Code of Business Conduct and Ethics reflects our commitment to patients.

## PTC Expectations

The PTC Expectations guide “how” we approach our work and interact with others; they influence “how” we accomplish our goals and drive the behaviors that are important to our culture.

### WORK AS ONE PTC

We are a dynamic, global network of empowered, high performing teams that achieve extraordinary results. We partner openly to bring out the best in ourselves and maximize talent.

### PASSIONATE ABOUT PURPOSE

We are more than a company; we work for a cause. We make decisions based on patients’ needs.

### CHAMPION INCLUSION, TRUST & RESPECT

We leverage the strength of our diversity. We require a fair and ethical environment where employees can flourish.

### EVER BETTER

We are always raising the bar. We act with a focus on quality and a sense of urgency.

### BE BOLD

We challenge. We adapt.

### BE KIND

We go beyond just being nice. We are friendly, considerate and helpful. We care about each other.

### THINK LIKE AN ENTREPRENEUR

We are energized by solving difficult problems, bringing innovation and creativity to our work. We are tenacious and tireless in our quest for breakthrough solutions.





## Our Culture

*Our culture is to make every day count; to care for each other, our community, and for needs of our patients; to be critical, not cynical, of what we do, but not of each other; we strive every day to be better than we were the day before.*

*We want to be part of an important cause and strive to achieve great accomplishments.*

*We are more fearful of not daring to do great things than of failing.*



- > **Our PATIENTS:** At PTC we care for our patients' safety and well-being. Patients should always be our key focus.
- > **Our EMPLOYEES:** We treat our employees fairly and respectfully.
- > **Our BUSINESS PARTNERS:** We aspire to be a trusted healthcare partner in the rare disease area.
- > **Our SHAREHOLDERS:** We commit to our shareholders to strive for performance and always with integrity.
- > **Our COMMUNITIES:** We are doing our best to be good citizens.

## A LETTER FROM OUR CEO



Over the past two decades, we have built our business on the basis of integrity, trust and high standards. Our Code of Business Conduct and Ethics has been developed to assist you and the Company in fulfilling our commitment to patients while acting with integrity. It serves as the basic guide to our program of compliance with the laws under which we operate. Additionally, the Code contains principles and standards to guide our business behavior throughout the world.

With your support, we know that the Company's reputation for integrity and fair dealing will continue to be a source of pride for all of us. I ask that you thoroughly review our Code of Business Conduct and Ethics, and reflect on how each of us can further promote ethics and integrity in every way in which we serve patients.

*"No matter how we change and grow, the core of who we are, embodied in our values and standards, will remain constant."*

**Matthew B. Klein, M.D., M.S., FACS.**  
Chief Executive Officer, PTC Therapeutics, Inc.



# Overview

Our Code of Business Conduct and Ethics provides guidance to help us make the right ethical decisions while doing business on behalf of the Company. The Code is a tool to help us apply our core ethical values to situations that we may face. It serves as our baseline standard and as a quick guide to our policies.

### Who Must Follow the Code

The standards outlined in this Code apply to all officers, directors, and employees of PTC and all of its subsidiaries and affiliates worldwide. PTC expects its contractors, consultants and any other parties acting on behalf of the Company to comply with all applicable laws and regulations, as well as with the compliance principles set forth in this Code. Failure to follow this Code may be subject to disciplinary action.

Any exception to this Code must be approved in advance by the Executive Vice President and Chief Legal Officer or the Vice President, Chief Compliance Officer.

### Dissemination and Amendment of this Code

Each new employee, officer, and director of the Company will receive this Code upon commencement of employment or other relationship with the Company. The Code will be distributed annually thereafter via the Company's learning management system. All recipients must certify that they have read and understand this Code and will comply with its terms.

The Company 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 located on PTC's intranet site or by requesting a copy from the Compliance department.

This document is not an employment contract between the Company and any of its employees, officers, or directors.

*"The standards outlined in this Code, and the spirit of the Code, should govern our conduct at all times."*

## A Shared Responsibility

Each and every employee of the Company is responsible for doing the right thing to support our culture and conduct business with integrity. This Code is one of the ways we communicate the clear expectations we set for our employees.

### All PTC employees are expected to:

- Understand and comply with this Code, PTC policies, applicable laws, and regulations wherever we do business
- Conduct themselves in an honest and ethical business manner
- Ask questions if unsure about what to do in a particular situation
- Promptly report any potential violations of this Code, PTC policies, applicable laws, and regulations
- Fully and honestly cooperate with any Company inquiry or investigation of alleged misconduct
- Refrain from engaging in any conduct that may be perceived as retaliation against anyone for raising questions or concerns in good faith regarding compliance with policy or legal requirements

### Additional responsibilities of Managers, Officers and Directors

Managers, officers, and directors are responsible for enforcing this Code. In addition, you are expected to:

- Serve as a positive role model for employees by acting with integrity every day
- Create an environment where employees feel comfortable approaching any member of the senior management

- team, Human Resources, and the Chief Compliance Officer if they have questions regarding the application of this Code in any situation
- Encourage employees to ask questions and raise concerns without fear of retaliation
- Demonstrate commitment to maintaining PTC's high ethical standards and the importance of complying with this Code
- Promptly report any potential violations of the law, the Code or other PTC policies

### Protection of Personal Information

At PTC, we respect the privacy of the personal information that is entrusted to us by healthcare professionals, patients, employees, and others. Each of us has a role to play in protecting, securing, and appropriately processing personal information (e.g., collecting, using, accessing, viewing, storing, transferring). "Personal information" is any information that can directly or indirectly identify an individual.

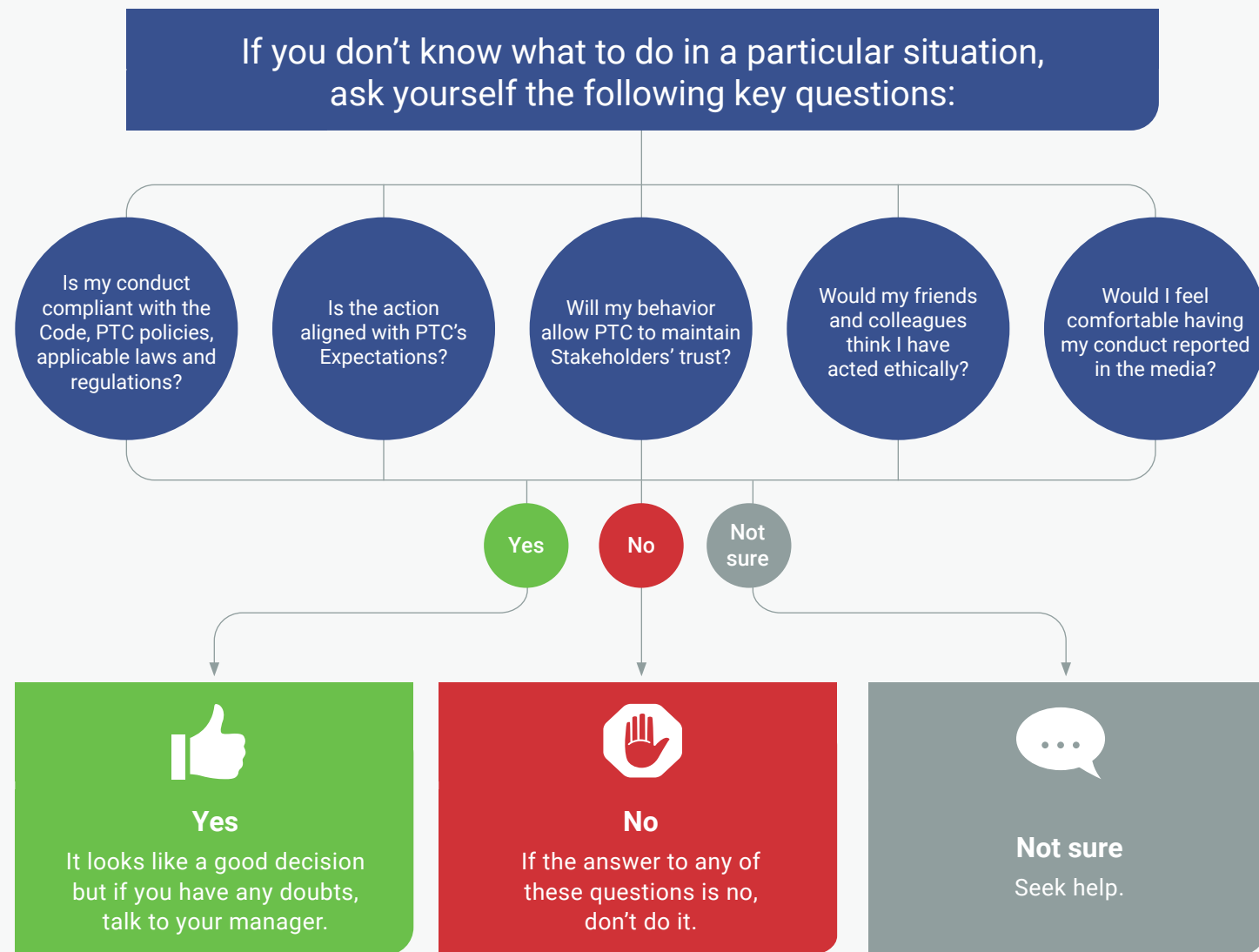
Unlawful or unauthorized use or disclosure of Personal Information could adversely affect the individual whose information is compromised, as well as potentially expose PTC to legal and regulatory risks, financial damage, and reputational harm. If you become aware of a potential personal data breach, report it immediately by sending email to [dataprivacy@ptcbio.com](mailto:dataprivacy@ptcbio.com).





## Making the Right Decisions

Each PTC employee is expected to read this Code and follow the guidance accordingly. Although it is impossible for this Code to describe every situation that may arise, the standards outlined in this Code, and the spirit of the Code, should govern your conduct at all times. If you have any questions or need clarification, it is always important to talk to your manager, Human Resources, or Compliance Officer to ensure that you know what is expected of you.



## Seeking Help and Reporting Compliance Concerns

PTC is an organization with strong values. The Code contains general guidelines for conducting business with high ethical standards.

We are committed to an environment where open, honest communications are the expectation, not the exception. It is everyone's responsibility to do the right thing, to support our culture, and to conduct business with integrity. We want you to feel comfortable in approaching your supervisor or management in instances where you believe violations of policies or standards have occurred, without fear of retaliation.

In situations where you prefer to place an anonymous report in confidence, you are encouraged to use the Confidential Hotline. The Hotline is hosted by a third-party provider, EthicsPoint. It is available 24 hours a day, seven days a week.

The information you provide will be sent to us by EthicsPoint on a confidential and anonymous basis if you should choose. You have our guarantee that your comments will be heard.

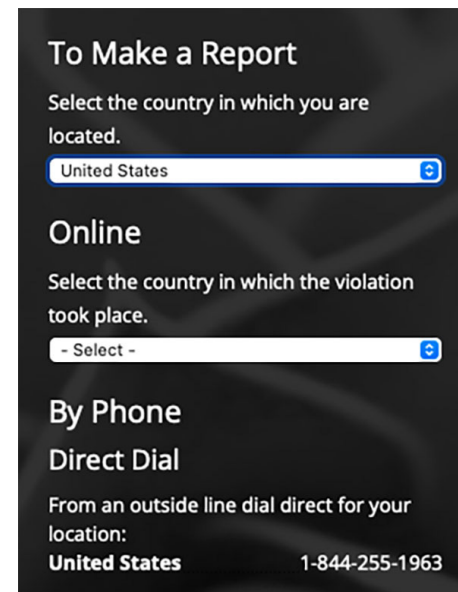
### Reporting Options

There are many resources available if you have a question or concern about the topics discussed in the Code, compliance issues or need to report a suspected violation.

**Option 1:** Speak to your manager

**Option 2:** Raise a concern with Compliance, Legal, or Human Resources

**Option 3:** Report online or via PTC's confidential Hotline



In the U.S., you may file a report via the Hotline telephone 844-255-1963. You may also file a report online via [www.ptcbio.ethicspoint.com](http://www.ptcbio.ethicspoint.com). If you are dialing internationally, you can locate the local telephone number online [www.ptcbio.ethicspoint.com](http://www.ptcbio.ethicspoint.com). To display the Hotline telephone number, select the country where you are located.



### Q. What types of matters should be reported?

A. You are encouraged to report potential violations of our Code, PTC's policies or applicable laws and regulations. This may include questionable financial reporting, insider trading, data privacy breaches, disclosures of confidential information, environment, health and safety, or any other matter you would like to raise.



## Investigation Process

All reports of alleged, suspected, or potential violations will be reviewed and if an investigation is warranted, the Compliance Investigation Committee ("CIC") will convene to discuss next steps and assign an investigator(s). The CIC will collect and analyze relevant facts so that the company can make a prompt and thorough response.

Failure to fully cooperate with any inquiry or investigation by the Company regarding an alleged violation of this Code, the law or

other PTC policies may result in disciplinary action, up to and including termination of employment.

Any employee involved in managing and/or conducting the investigation must keep information related to the investigation in strict confidence to the extent possible. When an outcome has been reached, the investigator will inform the reporter accordingly, and may or may not provide details of the outcome or disciplinary action taken due to confidentiality and privacy concerns.

## Protection Against Retaliation

We will not tolerate retaliation against anyone who reports an alleged violation of the Code, PTC policies, applicable laws or regulations in good faith, or anyone who cooperates in any investigation or inquiry regarding such conduct.

Employees are expected, as part of the ethical standards required by this Code, to act responsibly and with integrity. Making a complaint or reporting in bad faith is a

violation of this Code. Any employee who makes a complaint or report in bad faith will be subject to disciplinary action, up to and including termination of employment.

If you believe that you or another employee has been retaliated against in violation of this Code, report it immediately to your manager, Human Resources, Legal, Compliance, or the Confidential Hotline.

*"When you report a concern, the matter will be taken seriously, and all information provided will be treated confidentially."*

## Disciplinary Action

Failure to comply with the standards outlined in this Code will result in disciplinary action, up to and including termination of employment. Certain violations of this Code may require the Company to refer the matter to the appropriate governmental or regulatory authorities for investigation or prosecution. Moreover, any supervisor who directs or approves of any conduct in violation of this Code, or who has knowledge of such conduct and does not immediately report it, will be subject to disciplinary action





## Our Commitment to Patients

### Patient Benefit

We expect our employees to focus on better patient outcomes and to strive to address patients' needs while complying with the applicable laws governing the relevant activities. We treat patients with respect. We work to understand and meet their needs. We tell the truth about our products and capabilities.

PTC gives precedence on enabling patient impact and providing innovative solutions to help improve their lives. Compromising patient benefit and safety is never acceptable.

### Patient Advocacy and Communities

Patients are at the center of everything we do at PTC. It's just that simple. We work to treat rare and life-threatening diseases and bring moments to patients and caregivers.

PTC is committed to working with and supporting patient advocacy groups, which are incredibly important assets to rare disease patients and their families. We recognize the importance of fully understanding the needs of the patient communities we serve. In our interactions with patient groups, we strive to build relationships based on mutual respect and transparency.

Ensuring independence of the patient voice, being transparent in our interactions, and working cooperatively for the benefit of patients are at the core of these standards.



*“Patients are at the center of everything we do at PTC.”*





### Research and Development

We are proud of our work to advance human health care through our discovery sciences, pre-clinical research and clinical development we conduct. Our Research Integrity Policy documents our established processes for addressing allegations related to scientific misconduct, including inappropriate dissemination of personally identifying human subject data.

Preserving the rights, safety, and well-being of patients participating in our clinical trials is our priority. We protect patient safety through appropriate informed consent procedures and good clinical practices. We are careful not to expose participants to unnecessary risks. In addition, we take the necessary precautions to ensure participants understand the nature and purpose of the trials via informed consent procedures.

It is our duty to take the necessary steps to protect the privacy and confidentiality of subjects participating in our trials, anywhere they are being conducted.

PTC complies with all applicable laws, regulations, and industry guidance. We are committed to respecting Good Clinical Practices in all our development activities.

We present results in a transparent and timely manner in compliance with all local regulations.

### Product Quality and Safety

PTC products are developed and manufactured to be fit for purpose, safe, and free of deficiencies and contamination. Quality Management Systems, formal processes, and procedures are established and aligned with regulatory requirements to drive preventive and continuous improvement, control, and consistency throughout the product lifecycle.

Every PTC employee is responsible for ensuring commitment to quality and continuous improvement through:

- Conducting business in an ethical manner in compliance with quality regulations and standards
- Managing documents and data in a manner to ensure data integrity
- Following procedures and ensuring they are trained to complete all duties
- Escalating product quality or patient safety concerns
- Developing solutions that are efficient and effective to ensure best practices
- Ensuring procedures and processes are implemented and followed



*“We are proud of our work to advance human health care through the clinical research we conduct.”*





# Our Commitment to Employees

## Conflicts of Interest

A conflict of interest occurs when you, as an officer, director, or employee, have a competing interest that may interfere with your ability to make an objective decision; when your personal interest interferes, or appears to interfere, with the interests of the Company; or when you are prevented from performing your Company duties and responsibilities honestly, objectively, and effectively.

It is your responsibility to disclose any transaction or relationship that reasonably could be expected to give rise to a conflict of interest to the Chief Legal Officer and, if you are an executive officer or director, to the Board of Directors.

Since conflicts of interest are not always clear-cut, you should fully disclose any actual or potential conflicts of interest to your manager, Human Resources, Legal or Compliance. Many times, a conflict can be avoided or resolved through an open discussion.

## Insider Trading

The Company has adopted an Insider Trading Policy which prohibits employees, officers and directors who have material non-public information about the Company or other companies, including our suppliers and customers, as a result of their relationship with the Company, from trading in securities of the Company or other such companies, as well as from communicating such information to others who might trade on the basis of that information. The Insider Trading Policy is available on the Company's intranet site.

If you have any questions regarding the Insider Trading Policy or your ability to trade Company securities, you should consult with the Chief Legal Officer or a securities attorney within the Legal department before making any purchase or sale.

Material Information may include but is not limited to:

- Business strategies
- Financial earnings
- Significant clinical or regulatory developments
- New product offerings
- Potential mergers or acquisitions



Here are some ways and situations where a conflict of interest may arise:

- Working for a PTC competitor, supplier, or business partner
- Having an ownership interest in a business that sells goods or services to PTC
- Offering or accepting a gift, payment, or favor from a business partner
- Conducting business on behalf of PTC with a company that a family member owns



## Employment Principles



Harassment involves any unwelcome or otherwise inappropriate conduct, whether verbal, physical, or visual that creates an intimidating, offensive, abusive, or hostile work environment. If you experience or witness any form of discrimination or harassment, report it immediately to your manager, Human Resources, Legal, Compliance, or the Confidential Hotline.

### Discrimination and Harassment

At PTC, we treat our employees fairly and respectfully. We will not tolerate unlawful discrimination and harassment. We provide an atmosphere where everyone can be their best at work, where the sum of our diversity is viewed as an advantage, and where any employee can feel comfortable raising concerns without fear of retaliation. It is not only our responsibility to conduct ourselves in an ethical business manner, but to ensure that others do the same.

We maintain a work environment that is free from unlawful discrimination or harassment. To that end, PTC prohibits any form of employee harassment or discrimination based on factors such as race, gender, color, national origin, religion, age, sexual orientation, disability, gender identity, familial status, military or veteran status, genetic information, citizenship status, or any other characteristics protected by laws of the relevant country.

At PTC we believe everyone involved in our business, including contractors, vendors, and suppliers, are responsible for ensuring a workplace free of discrimination. We encourage any good faith matter to be reported via multiple reporting paths, including via managers, Human Resources, Compliance, Legal, and PTC's Confidential Hotline. We not only stand against discrimination, but we also stand against retaliation for reporting a good faith matter or being involved in an investigation.

### Human Rights, Labor, and Compensation

PTC supports human rights. We do not tolerate human rights abuse, including but not limited to child labor, human trafficking, involuntary or forced labor, or unfair wages and benefits.

PTC is committed to providing all workers with fair and competitive wages in exchange for high performance conducted following the PTC Expectations with high integrity. We comply with employment laws of the countries in which we do business and expect our suppliers and business partners to do the same. If you have any reason to believe anyone we work with is violating these standards, please report it to your manager, Human Resources, Legal, Compliance, or the Confidential Hotline.

### Substance Abuse-Free Workplace

We maintain a work environment that empowers everyone to do their best at work. A safe workplace inspires trust and allows us all to contribute and succeed.

Help ensure our workplace is free from the influence of any substance that could impair one's ability to work safely and professionally. Being impaired on the job has negative consequences on our reputation and productivity, and could put employees, patients, and the Company at risk.

Promptly report any suspicions that a colleague or business partner may have illegal drugs or be under the influence of drugs or alcohol at work, or at work-sponsored events to your manager, Human Resources, Legal, or Compliance. You may also report your concerns via PTC's Confidential Hotline.

If you or a family member struggle with substance abuse, ask for help. Contact Human Resources for more information regarding support options that are available via PTC's Employee Assistance Program (EAP).

### Confidentiality

Employees, officers, and directors must maintain the confidentiality of sensitive business, scientific, technical, employee, or other information entrusted to them by the Company, its customers, suppliers, business partners, or collaborators, except when disclosure is authorized or legally mandated.

Each Company employee signs an appropriate confidentiality agreement as determined by the Company based on the classification and access to information they receive, and also may have a fiduciary obligation to preserve Company confidentiality.

Additionally, employees should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company, is not communicated within the Company except to employees who have a need to know such information to perform their responsibilities for the Company.



**Q. My co-worker makes ethnically insensitive jokes that make me feel uncomfortable. What should I do?**

A. You should let the co-worker know that he/she is making you feel uncomfortable at work and ask him/her to stop. Regardless of whether you speak to him/her or not, you should report this conduct to your manager or the Human Resources department to take appropriate action





## Our Commitment to Shareholders

### Protection and Proper use of Company Assets

Proper protection and use of Company assets and assets entrusted to it by others, including proprietary information, is a fundamental responsibility of each Company employee. Company assets include funds, facilities, equipment, information systems, intellectual property, and confidential information.

Theft, carelessness, and waste have a direct impact on the Company's financial performance. To protect our physical and intellectual property, employees, officers, and directors are expected to:

- Use the Company's assets and services solely for legitimate business purposes of the Company and not for any personal benefit or the personal benefit of anyone else
- Not take any opportunities discovered through their position with Company or the use of property or information of the Company
- Ensure that business information processed is accurate, appropriate, ethical, and legal
- Safeguard Company assets against unauthorized use or removal, as well as against loss by a criminal act or breach of trust
- Never provide proprietary information to third parties, including business partners and vendors, without appropriate authorization and any required confidentiality agreements

If you become aware of any known or suspected theft or fraud, report it immediately to your manager, Human Resources, Legal, Compliance, or the Confidential Hotline.

### Competition and Anti-Trust

PTC is committed to complying with antitrust and competition laws wherever we do business.

These laws are intended to protect the competitive process by preventing restraints on trade and abuses of a dominant market position resulting in unfair trade practices. Generally, they prohibit agreements between competitors that relate to price or terms and conditions of sale that may result in hindering competition. Some examples of unlawful anticompetitive practices include dividing territories between competitors, price fixing, and agreeing to certain activities or actions that are intended to prevent fair competition.

- Only those with appropriate internal authority are permitted to set price or agree on discounts or any other terms of sale for any of our products. All pricing decisions, discounting policies, and other terms of sale must comply with applicable laws, regulations, and PTC policies
- When attending industry events where competitors are present, limit discussions to the industry meeting agenda items
- Do not engage in discussions or enter into agreements, either oral or written, with an existing or potential competitor about price, discounts, division of territories, markets or customers, or any other terms of sale



#### Q. What does Intellectual Property (IP) include?

A. IP includes trade secrets and discoveries, methods, know-how and techniques, innovations and designs, systems, software and technology, patents, trademarks, and copyrights.

#### Q. What should I do if a topic such as pricing and discount practices comes up during a discussion while at an industry event?

A. In order to avoid the potential of violating antitrust or competition laws, leave the discussion immediately and report the incident to the Legal department. Even the appearance of collusion could result in significant penalties and reputational damage for you and PTC.



## Books, Records and Public Reports



### Q. What constitutes a "record"?

A. A record is any paper or electronic record, including emails, texts, memos and notes.

### Concerns Regarding Accounting or Auditing Matters?

Employees with concerns regarding accounting, internal accounting controls or auditing matters should report all such concerns via PTC's Confidential Hotline or to the Chief Legal Officer and Principal Financial Officer of the Company.

### Books and Records

Accurate information is essential to the Company's ability to meet its legal and regulatory obligations. All employees are responsible for maintaining Company books and records that are transparent and fairly reflect all transactions with reasonable detail and adequate supporting documentation, and in compliance with applicable laws and regulations.

Employees who have questions about maintaining records should contact the Legal department for guidance.

### Public Reports

PTC's financial statements conform to generally accepted accounting principles and internal accounting policies. We provide, in all material respects, full, fair, accurate, timely, and non-misleading disclosure in reports and documents that are filed with, or submitted to, the U.S. Securities and Exchange Commission and in other public communications.

### Social Media

Social media has become embedded within our society as a modern form of communication. Social media is defined as any online platform that allows you to engage in a two-way conversation. A share, retweet, post, or even a like could be considered an endorsement of a piece of content. With that said, be mindful that while many may view social media activity as casual or personal business, these activities can impact PTC.

- Always use common sense and exercise sound judgment when engaging in social media
- Consider all of your posts and comments to be permanent, regardless of the 'Delete' functionality
- Be mindful about tagging your colleagues in posts or in photos without pre-approval
- Remember that the Company reserves the right to determine whether a particular social media presence or posting violates our internal policies and to take appropriate steps to ensure compliance with our policies and applicable laws
- Stay current on the rules and policies that apply to your use of social media

If you are unsure about whether or not you should post something, consult PTC's social media policy or reach out to your manager or the Corporate Communications team for further guidance.

### Compliance with Laws, Rules and Regulations

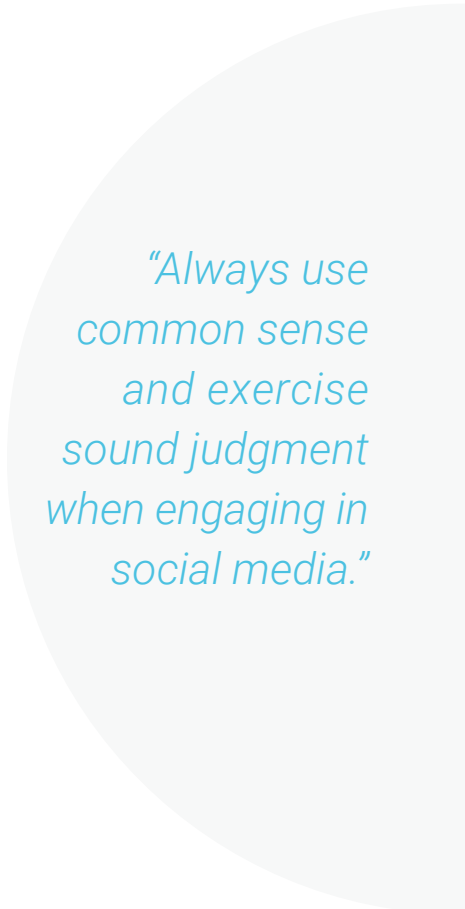
All PTC employees and agents acting on its behalf are required to comply with all laws, rules, and regulations that apply to the operations of the Company in the United States and other relevant countries. In the event local laws and regulatory requirements differ from this Code or other PTC policies, the stricter requirements generally apply. In certain aspects of our business activities, we have made further commitments to comply with industry Codes of Conduct. If you have questions about which laws, regulations, policies, or other standards apply to your role or activities, consult your manager or the Legal or Compliance departments.

Many of the laws that apply to our business carry strict penalties for violations. The Company can be subjected to significant monetary fines and other criminal or civil sanctions. Additionally, violations may result in sanctions against individual employees, including substantial fines and prison sentences. Allegations that the Company has violated the law may result in significant damages to the Company's reputation and its relationships with customers and other stakeholders. We all share an obligation to help ensure that the Company and its representatives comply with all applicable laws.

## Speaking about the Company

Our stakeholders deserve clear, consistent, and accurate information about our Company. To achieve a consistent voice and message when making disclosures or providing information to the public or media, only authorized persons may speak on behalf of the Company. To ensure professional handling, all media requests should be directed to the Corporate Communications department and requests from financial analysts, stockholders, and industry analysts should be forwarded to Investor Relations.

The Company's policies with respect to public disclosure of internal matters are described more fully in the Company's Global Communications Policy.



*"Always use common sense and exercise sound judgment when engaging in social media."*



# Our Commitment to Business Partners

## Interactions with Healthcare Professionals

PTC works with Healthcare Professionals (HCPs) in various capacities. We engage healthcare professionals to serve as speakers, advisors, and consultants. We only engage HCPs when there is a clear, legitimate business need. Regardless of the type of interaction, all interactions are conducted in a truthful manner, avoiding deceptive practices and potential conflicts of interest, and in compliance with all applicable laws and regulations as well as this Code and PTC's internal policies on Interactions with HCPs.

## Anti-Bribery / Anti-Corruption

We do not offer or provide bribes or kickbacks to win business, to influence a business or prescribing decision, or to advance our interests with government authorities. In particular, our interactions with healthcare professionals, government entities, government employees, and others must be legitimate and never to obtain an improper advantage or improperly influence or encourage a decision by them.

Bribes and kickbacks are criminal acts, strictly prohibited by law. The U.S. Foreign Corrupt Practices Act, the UK Anti-Bribery Law, and other relevant anti-corruption laws prohibit giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business.

The Company's policies with respect to prohibition of corruption and bribes are described more fully in the Company's Anti-Corruption Policy, which is available on the Company's intranet site.

In addition, all PTC employees and agents acting on its behalf as well as select third parties are required to complete training on a regular basis. Training topics include but are not limited to PTC's Code of Business Conduct and Ethics, Anti-Corruption Policy, Global Interactions with Healthcare Professionals Policy, and PTC's confidential hotline for raising questions or concerns. To learn more about our Global Compliance Program click [here](#).

*"We do not offer or provide bribes or kickbacks to win business, to influence a business or prescribing decision."*

**Bribery can be active or passive. PTC prohibits any employee or agent from engaging in either form.**

**Active Bribery** is the act of bribing another individual by improperly providing gifts or entertainment to anyone in a position to make decisions about PTC's products that are intended to or appear to be intended to influence the actions of that individual, even if it is local practice or custom to do so (e.g., providing a payment for an improper purpose to a government official).

**Passive Bribery** is the act of being bribed. Examples of passive bribery include accepting gifts or hospitality from a supplier in return for promising that they will be given an upcoming contract. Additionally, accepting a gift, payment, or other form of kickback from an agent, distributor, or HCP in exchange for directing business towards them is prohibited.



## Export / Import Trade Controls

PTC Therapeutics complies with the laws and regulations controlling the import and export of goods, products, services, equipment, information and technology between the United States and other countries.

We comply with applicable trade controls

and customs requirements as well as the laws that apply to boycotts and other restrictions on our trade with certain countries, organizations, and individuals.

We follow the rules and regulations on trade compliance associated with the countries in which we do business.

## Use of Third Parties

Our Business Partners, including suppliers and vendors, are our trusted partners. We treat all of our Business Partners responsibly, ethically, and respectfully. We award business based on PTC's best interests and encourage diversity amongst our supplier base.

In interacting with our Business Partners, we honor all confidentiality agreements and strive to meet our contractual obligations. We support competitive business practices and make decisions objectively without regard to personal or financial gain or personal relationships.

• Always follow Company policy and procurement procedures when selecting and working with our suppliers and business partners.

- Only award business and select suppliers based on PTC's business needs.
- Never accept special favors or treatment from suppliers, other business partners, or anyone who wants to do business with the Company.
- Do not share confidential supplier prices, terms, or similar sensitive information with competitors.
- Always protect the proprietary and personal data of our suppliers and business partners, and ensure our suppliers and business partners protect PTC's proprietary information.

## Political Activity / Lobbying

PTC respects the right of employees and agents to participate in personal political activities such as providing contributions to causes and organizations they support. Such activities may include civic projects, supporting candidates for elective office, participation in public issue campaigns and making personal political contributions.

### Personal Political Contributions

- Always make it clear that your personal views and actions are your own and not those of PTC.
- Never use PTC resources such as funds, time, or facilities to support your personal political activities without proper authorization.
- Never suggest or imply that you are representing the Company from a political standpoint.

If you have questions or concerns about whether your activities could be misinterpreted as those of PTC or want to know if you can participate in a political activity, contact the Government Affairs department.

### Lobbying Activities

PTC employees or agents may not engage in any lobbying activities on behalf of PTC without prior approval and coordination with the Government Affairs department. If you are not sure whether your activities would be considered lobbying activities, please consult PTC's Political Contributions and Lobbying Policy or consult the Government Affairs department. Certain activities may trigger legal or financial requirements. PTC complies with all applicable local, state, federal, and international reporting and disclosure requirements.

### Company Political Contributions

- Political contributions may not be provided to a candidate, political party organization, political committee, or political organization in return for an implied or promised purpose.
- When corporate contributions are made, they will be reflective of PTC's corporate interests and not those of any individual employee, agent, or officer of the Company.
- All political contributions must comply with all applicable laws, disclosure requirements, and PTC's internal policies.

*"If you are not sure whether your activities would be considered lobbying activities, contact Government Affairs for guidance."*





# Our Commitment to Communities

## Health, Safety and Environment

PTC is committed to providing a safe and healthy workplace. Situations that may pose a health or safety hazard must be reported immediately. We can only achieve our goal of a safe and healthy workplace through the proactive participation and support of everyone.

We must all be aware of the impact on the environment and do our part by reducing resource consumption, waste generation, and environmental pollution.

To meet our goal of being a good citizen, here are just a few of the many things we do:

- Comply with all environmental laws that apply to PTC wherever we are located
- Take responsibility for maintaining an incident-free workplace and report any concerns to management
- Conserve resources such as water and paper
- Act responsibly by disposing of waste and handling and storing chemicals and other hazardous materials safely and in an environmentally sustainable manner

To learn more about our sustainability efforts, visit the [Annual Report ESG section](#).

*“We care about the world we live in and have a steady commitment to maintaining the environment.”*

