



CODE OF BUSINESS, CONDUCT AND ETHICS



INTELLIA THERAPEUTICS CODE OF BUSINESS, CONDUCT AND ETHICS

2023

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OUR COMMITMENT TO OUR VALUES

Message from the CEO

Dear colleagues,

At Intellia our values are the principles by which we operate — both as individuals and as ONE team. While our Core Values manifest the attributes of how we envision accomplishing our mission with high performance, we will ultimately be successful only if we fuse our pursuit of high performance with high integrity. When we think of it this way, we realize how essential integrity is for us all.

This Code of Conduct is the cornerstone of our ethical foundation. Please read it carefully and keep it front and center in your thinking as you work together.

And remember this always: you are the only one who can be responsible for your personal integrity while we, unified as ONE, collectively bear the responsibility for Intellia's integrity.

Truly yours,

A handwritten signature in black ink, appearing to read "John", with a long, sweeping underline that extends to the right.

John

Intellia's Core Values

At Intellia, our values are at the heart of our company's identity and culture. Our Code of Business Conduct and Ethics is one of the ways we create our culture.

ONE

One is respect for individuals and our unique qualities, strengths and experiences; our own ways to understand, learn and improve. One is our single-minded determination to excel and to succeed together. One is trust and relying on every one of us to triumph.

DISRUPT

Disrupt by thinking courageously to create a better future. Disrupt by defying conformity and interrogating the status quo. Disrupt with challenging thoughts and using skepticism and imagination to develop innovative solutions.

EXPLORE

Explore because we seek new ways to tackle disease. Explore to open our minds to be free from assumptions and be open to new ideas. Explore by staying curious and pushing boundaries. Explore means thinking of new ways to overcome obstacles.

DELIVER

Deliver by focusing on the objective and your determination to complete the task. Deliver by advancing relentlessly and by maintaining high standards. Deliver by staying accountable and pulling your weight. Deliver because patients are counting on us to make the promise a reality.

Commitment to Conducting Business with Integrity and Ethical Decision Making

At Intellia, we are committed to developing potentially curative genome editing treatments in accordance with the highest ethical, scientific and safety standards. We are committed to upholding the letter and spirit of the law in everything we do. As a company, and as individuals, we each have a responsibility to behave ethically and with integrity at all times.

Our Code of Business Conduct and Ethics (the "Code" or "Code of Conduct") summarizes our key policy principles and establishes our expectations to ensure we are at all times honoring our values and complying with our policies, applicable laws, rules and regulations. Our Code of Conduct covers a wide range of business practices and procedures that, in many cases, are covered in further detail by other Intellia policies.

The purpose of this Code Is to inform Intellia Personnel of their legal and ethical obligations to Intellia, and our collaborators, shareholders, employees, governmental agencies, partners, healthcare providers, patients and the general public. However, this Code of Conduct cannot cover every possible situation that may present itself in the business and regulatory environment in which Intellia operates. Ultimately, you must use good judgement and take care to perform your duties ethically and legally.

We believe that ethical conduct is critical to our Company's success, and we all share in this responsibility. Read the Code of Conduct carefully and refer to it frequently. It provides you with an overview of how we expect you to conduct yourself while you are engaging in business on Intellia's behalf.

All Intellia Personnel must certify annually that they have read this Code of Conduct and they understand and will comply with applicable laws and regulations and the policies set forth in the Code. The policies referenced in this Code of Conduct are available on Intellia's Intranet, and applicable policies are provided to Covered Third Parties. If you are ever uncertain about how to comply with the Code of Conduct, you are responsible for seeking guidance from your manager, Human Resources or the Legal Team.

Application of the Code to Intellia Personnel and Covered Third Parties

The Code sets out basic principles that apply to all employees, officers, and directors ("Intellia Personnel" or "you") of Intellia, including its subsidiaries and affiliates (collectively, referred to as the "Company" or "Intellia,"). As a Company, and individually, we are committed to conduct in accordance with the Code and seek to avoid even the appearance of improper behavior. The Code must also be adhered to by any third party working in Intellia facilities, utilizing Intellia systems or conducting business on behalf of the Company; and the Company's agents, representatives, and business partners, including but not limited to contingent workers, third party contractors, vendors, suppliers, and any other party acting on our behalf (collectively "Covered Third-Party"), to the extent they are engaged in the activities outlined in this Code of Conduct.

Intellia Personnel and Covered Third Parties are responsible for understanding and complying with the standards described in the Code of Conduct. Violations of this Code of Conduct may result in corrective action, including disciplinary action up to and including termination of employment or business relationship, and, where appropriate, disclosure to governmental and regulatory authorities.

The Code: Cornerstone of Intellia's Compliance Program

Intellia's compliance program sets out the standards of quality and integrity across our company. The goal of our compliance program is to promote the prevention, detection and correction of conduct that is illegal or that does not conform to our standards of ethical conduct. Our Code of Conduct is an integral part of our operations and demonstrates our commitment to operating ethically and in compliance with the laws and regulations that apply to us, individually and collectively. In addition to the information set forth in the Code of Conduct, the foundation for Intellia's compliance program also includes applicable policies and procedures that govern legal and regulatory compliance and ethical business practices; education and training; a reporting mechanism for suspected compliance issues; the use of audits or other techniques to evaluate compliance and areas for improvement; and personnel and disciplinary policies. Intellia's compliance program is overseen by our Compliance Officer. The success of our compliance program relies on the support and commitment of Intellia's leadership. The members of the Company's Board of Directors, the Chief Executive Officer ("CEO"), members of our Executive Leadership Team ("ELT"), and members of our senior leadership team are committed to ethical leadership and growing the company through compliant business strategies.

A Note from the General Counsel: Deliberate, Ethical Decision Making

Friends,

Recent research into decision making indicates that the number of daily choices each of us makes is estimated in the thousands. Luckily, many of these decisions require little thought because the consequences are ephemeral. But there are decisions we are involved in or make which have such significance to us and others that they deserve our investment in time and reflection. The Code of Conduct provides guidance and tools to enable you to make ethical decisions, but it's not intended to cover (nor could it) all potential ethical situations. You and your Intellia partners must scout out the ethical risks, deliberate on them and exercise good judgement. When making decisions at Intellia, it is always ok to pause and reflect on the Code, our Mission and our Values.

When faced with a difficult ethical decision and before taking action, ask yourself and others, "is it consistent with the Code of Conduct, is it legal, is it ethical, is it right?" Apply circumspection as to how the decision might impact us broadly. Exercise foresight by considering what the decision will lead to and what it will look like in the future. Query whether you would feel comfortable explaining the decision to family or friends or consider how it would feel if the decision were disclosed in the media.

You can always and at any time talk about an ethical risk with your manager, someone from HR or Legal or an appropriate subject matter expert. Ethical decision making, while inherently dependent on individual integrity, is a team sport.

With sincere gratitude for your conscientious read of the Code and your commitment to our integrity,

Sincerely,

A handwritten signature in black ink that reads "James Basta". The signature is written in a cursive, slightly slanted style.

Jim

The Importance of Your Voice

Understand Your Responsibilities and Ask Questions

At Intellia, we believe that operating in a responsible and ethical manner is essential to our business. Obeying the law, both in letter and in spirit, is the foundation on which our ethical standards are built. All Intellia Personnel must respect and obey the laws, rules, and regulations of the cities, states, and countries in which we operate. We expect and require that Intellia Personnel exercise good judgment and common sense in deciding the right actions to take, because this Code of Conduct and our supporting policies and procedures cannot cover every situation that may arise. Although you are not expected to know the details of each of these laws, rules, and regulations, it is important to know enough to determine when you should seek advice from others. If you are uncertain about any law, rule, or regulation, you should contact your manager, the Compliance Officer (complianceofficer@intelliatx.com) or any member of the Legal Team. And, if you are ever faced with a difficult decision or issue and you are unsure how to respond, you should ask questions until you feel confident you are on the right path.

We all play a part in making sure Intellia achieves the high standards that we set for ourselves, and the Company is committed to fostering a culture of openness, integrity, and individual accountability that allows you to feel comfortable raising compliance concerns without fear of retaliation.

Additional Responsibilities for Managers

Intellia's managers have additional responsibilities under the Code of Conduct. Your ethical behavior will shape the experience employees have at Intellia more so than any benefit the Company can offer.

As leaders, our managers should feel empowered to resolve performance issues, but are required to escalate integrity concerns, misconduct, retaliation concerns or any potential violations of this Code of Conduct to a Human Resources Business Partner ("HRBP") and/or the Compliance Officer (complianceofficer@intelliatx.com). And this responsibility extends beyond direct reports – if a manager becomes aware of a potential violation of the Code, they must report it. If you have a question or are not sure whether you can or should resolve an issue yourself, contact your HRBP or the Compliance Officer (complianceofficer@intelliatx.com) for support.

Expectations of Intellia's Managers

- Understand the Code of Conduct.
- Ensure your direct and indirect reports have read and understood the Code of Conduct and related policies and completed all required trainings.

- Enforce the Code of Conduct and any other policies of Intellia consistently.
- Make yourself available to employees when they have questions about the Code of Conduct or wish to discuss a concern.
- Immediately report all concerns raised under the Code of Conduct to Human Resources through an HRBP and/or the Compliance Officer at complianceofficer@intelliatx.com.
- Never retaliate against any employee who raises a good faith concern based on the Code of Conduct or any other policy of Intellia.
- Escalate any integrity concerns, misconduct, or any potential violations of this Code of Conduct that you become aware of.

Our Open-Door Philosophy

We believe an open-door approach is essential to fostering a work environment where individuals are able to raise concerns without fear of retaliation and with an understanding that their concern will be taken seriously. Intellia's open door approach means that we welcome and encourage questions, complaints, suggestions, and feedback without judgment or retaliation.

Raising Concerns, Presenting Ideas, and Asking Questions

While we hope that you feel comfortable discussing any matter with your manager, there may be times when you determine that is not appropriate. In those cases, other possible avenues for raising concerns include:

- Any member of management or ELT
- HRBP
- Compliance Officer (complianceofficer@intelliatx.com) or (857) 449-4172
- Reports to the Audit Committee can be addressed by mail to the Chair of Audit Committee c/o Intellia Therapeutics, Inc., 40 Erie St., Suite 130, Cambridge MA 02139

Specific concerns about Intellia's accounting or auditing practices, or internal controls and procedures for financial disclosure, should be reported directly to the Chair of the Audit Committee of the Board of Directors. Concerns about material operational controls or practices surrounding the collection and/or reporting of scientific data should also be reported to the Chair of the Audit Committee. Any violation of the Code of Conduct can be reported to the Chair of the Audit Committee in the event you are not comfortable reporting to the Compliance Officer or through your chain of command, as appropriate.

Anonymous Reporting

Intellia Personnel and Covered Third Parties may also communicate anonymously with the Compliance Officer and/or the Audit Committee of the Board of Directors to report any concerns or questions regarding potential violations of the Code of Conduct, any other policy or procedure of Intellia or any applicable laws, rules or regulations involving accounting, internal

accounting controls, auditing or securities law (including FCPA) matters in the ways identified below. In all cases, reports are anonymous, but must contain sufficient information to permit investigation of the concerns raised.

- Going to www.whistleblowerservices.com/ntla and completing the Secure Web Form.
- Calling the Speak Up Line at (844) 417-8866 and stating that you are submitting an anonymous report.
- In writing marked CONFIDENTIAL addressed to Compliance Officer or Chair of Audit Committee by U.S. mail to c/o Intellia Therapeutics, Inc., 40 Erie St., Suite 130, Cambridge MA 02139.

We Promptly Investigate Concerns Raised

All reports that are received by the Company will be reviewed and investigated in accordance with Intellia's internal investigations guidelines. The investigations process strives to ensure that all parties are treated with fairness and dignity. The process aims to assess relevant facts and information fairly and impartially, and to take action as appropriate. Substantiated violations of the Code may be subject to disciplinary actions up to and including termination of employment.

Protections for Concern Raisers

Critical to our open-door policy, each of us must feel secure in asking questions and raising concerns. Although we cannot guarantee absolute confidentiality, know that discretion is a priority when questions or concerns are raised in good faith. Every effort is made to appropriately maintain confidentiality, recognizing there are times where the law, nature of the concern, or other circumstances may restrict confidentiality. Any information provided during the investigation of a possible violation of the Code or any other policy of Intellia will be handled in a confidential manner to the greatest extent possible consistent with our need to conduct a full and fair investigation, and any person involved in an investigation should refrain from disclosing any information to anyone outside of the investigation unless required or allowed by law (including but not limited to filing a claim with a government agency and/or providing information needed to pursue an investigation) or when seeking their own legal advice.

When reporting a potential violation of the Code, you are expected to supply sufficient information to allow the Company to properly investigate the matter. As the ultimate objective of any investigation is to determine the truth, any person who is found to have misrepresented facts, made false statements or withheld information during an internal investigation, refused to cooperate with an investigation, or used the reporting procedures in bad faith will be subject to discipline, up to and including termination.

Full cooperation and candor is expected from any person reporting a potential violation, witnesses, and any person who is suspected of or alleged to have violated the Code or any other policy of Intellia.

We Have Zero Tolerance for Retaliation

Intellia prohibits retaliation in any form against anyone who, in good faith, reports violations or suspected violations of this Code, any policy of Intellia, or applicable laws or regulations, or who assists in the investigation of a reported violation. This protection extends to those who file a claim with a government agency or otherwise provide information necessary to pursue an investigation. Acts of potential retaliation should be reported immediately to:

- Any member of management or ELT
- HRBP
- Compliance Officer (complianceofficer@intelliatx.com) or (857) 449-4172
- Going to www.whistleblowerservices.com/ntla and completing the Secure Web Form.
- Calling the Speak Up Line at (844) 417-8866 and stating that you are submitting an anonymous report.

Claims or concerns of retaliation will be investigated in the same manner as any other potential Code of Conduct violation. Additional information can be found in the [SpeakUp Policy](#).

Our Commitment to Our People

Demonstrate Mutual Respect

One is a core Intellia value. We firmly believe our diverse workforce strengthens our collective performance and we aim to create an inclusive environment where our employees are given the opportunity to achieve their full potential. We respect diversity and are committed to a policy of equal employment opportunity and nondiscrimination. We all work best when we feel safe and respected. To that end, Intellia 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 law. Intellia employees receive mandatory annual anti-harassment training to help ensure that employees can work in an environment free from unlawful harassment.

We encourage you to report any potential violation of these principles to any Intellia manager, Human Resources or via the reporting channels outlined in this Code and the **SpeakUp Policy**. These principles apply to all aspects of the employment relationship, including application and initial employment, promotion and transfer, employee benefit plan policies, retirement, and termination. Review the [Discrimination, Harassment & Retaliation Prevention Policy](#) for further information.

Safe and Healthy Work Environment

Intellia is committed to providing a safe, healthy workplace that is free of violence. We each have a responsibility to work in a way that helps ensure the safety, health and/or security of all Intellia Personnel. If you become aware of a risk to the health, safety or security of our workplace, report it to the Emergency Coordinator via the **Intellia Therapeutics Incident Report Form** immediately. If it is a life-threatening emergency, call your local fire, police or other emergency responder first, then report it to the Emergency Coordinator as soon as you are able.

Intellia meets or exceeds all environment, health, safety (“EHS”) and security regulations and has a range of programs, plans, and procedures to ensure the safety of all people who come to work at the Company. These include hazard recognition, evaluation and control elements, workplace design and engineering, regulatory compliance management, employee and management engagement, training, communications, and audits. We value everyone who works at Intellia and we protect them in the workplace. All employees should be comfortable identifying and escalating safety concerns. As part of our commitment to protecting the safety of our employees and our sites, we adhere to the standards set by local laws and authorities (including the Occupational Safety & Health Administration (OSHA) in the U.S.) regarding the

health and safety of our employees. We also conduct routine monitoring and surveillance of our sites to reduce the risk of workplace accidents. In addition, we support employee wellness campaigns, health screening, and other programs to help people manage their own health and well-being.

Key Safety Concepts

- Threats, intimidation, or violence toward anyone at work is not tolerated.
- Never work impaired by drugs or alcohol. Use good judgement and never drink in a way that leads to impaired performance or inappropriate behavior, or in a manner that puts the safety of yourself or others in danger or violates the law. Comply at all times with the **Drug & Alcohol Use Policy**.
- If you are aware of a workplace accident or incident or a health or occupational safety concern, you should promptly report it to Environment, Health & Safety via the Emergency Coordinator.
- Review the Employee Handbook and Health & Safety Policy for further information.

Protect our Assets

All Intellia Personnel and Covered Third Party are expected to protect our assets and ensure their proper use. Our property, such as laboratory equipment and other Company-owned equipment and devices, are expected to be used for business purposes. Company assets include Company property and systems, such as computers, tablets, telephones, email, networks, and internet access. We are all responsible for protecting Company assets against loss, theft, or other misuse. It is important to always use Company assets in an ethical and legal manner.

All data residing on or transmitted through our computer servers or data storage facilities are Company property and subject to inspection, retention, and review by Intellia, with or without an employee's or Covered Third Party's knowledge, consent or approval, in accordance with applicable laws and regulations. To the extent permissible by law, employees and Covered Third Parties should not have any expectation of privacy when using Company -provided resources. This includes monitoring Company computers and networks, mobile phones, tablets, and other devices for appropriate uses. Any misuse or suspected misuse, loss, or theft of our assets must be immediately reported to the Head of IT at infosec@intelliatx.com or via the web portal.

Respect Data Privacy

Preserving the privacy of personal data is critically important to Intellia. You must comply with all applicable legal requirements and established policies related to the processing of personal data, including the provision of transparency notices to individuals about whom we process personal information. While our work requires us to process personal data about Intellia

Personnel, partners, patients, research study subjects, and HCPs, we are committed to respecting the privacy of each of these groups by limiting the collection of personal data to that which is relevant and appropriate for purposes of the processing. For more information, see our [Global Privacy Policy](#).

Our Commitment to Patients

Conduct Safe and Ethical Trials

At Intellia, we recognize the importance of clinical research in developing potentially curative genome editing treatments for people living with severe diseases. We are committed to conducting clinical trials in accordance with the highest ethical, scientific and safety standards to ensure we are protecting the health and welfare of the individuals who enroll in our clinical trials. This is true for our research conducted internally and in partnership with external organizations. Our clinical research complies with Good Clinical Practice guidelines and regulations issued by relevant regulatory bodies such as the EU European Medicines Agency and the U.S. Food and Drug Administration.

Monitor the Safety and Quality of our Products

We are committed to creating high quality products in compliance with current Good Manufacturing Practices. We protect patient safety by identifying, assessing, managing, and reporting adverse events and product quality complaints in a timely manner and as required by applicable laws and regulations. This data is used to provide accurate and up-to-date safety information to regulatory authorities, and potentially healthcare providers (“HCPs”) and patients. This information is critical to improving our products, helping us track issues for investigation and ultimately, maintaining our commitment to patients. Intellia personnel who become aware of a product quality issue or adverse event are obligated to report it using established procedures. Refer to the [Adverse Event Reporting Policy](#) for more detailed reporting requirements.

Commitment to Clinical Research & Clinical Trial Data Transparency

We are committed to sharing information about our clinical research and clinical trials in a responsible manner. We also support data transparency that advances science and medicine, protects participant privacy, and is in the best interest of patients and healthcare providers. Information about Intellia’s clinical trials is posted on clinical trial registries such as [clinicaltrials.gov](#) as required by applicable requirements.

Ethical Interactions with External Stakeholders

We recognize that our external stakeholders, including HCPs, patients and caregivers, healthcare organizations, and patient organizations, are uniquely positioned to understand the needs of patients, the performance of medicines in the clinical setting and unmet patient needs. And we are committed to working with these stakeholders in a manner that does not have, or appear to have, any undue influence on medical judgment, clinical trial outcomes, or

treatment recommendations. Interacting with external stakeholders is an important part of our business, but these interactions are subject to many laws and regulations to help ensure those interactions are appropriate. The following are some examples of activities that are prohibited by this Code:

- Engaging an HCP to be a paid consultant for Intellia to maintain a good relationship or to encourage prescribing Intellia products in the future.
- Compensating an HCP for their participation in an advisory board at a rate higher than fair market value.

Please consult Intellia's [Global Policy on External Stakeholder Engagements](#) for additional information.

Humane Use of Animals in our Research

Intellia is committed to the humane care of the animals we use in research. We use laboratory animals when scientifically necessary to make advancements and discoveries that otherwise would not be achieved. We apply the principles of replacement, reduction, and refinement when using animals in research and we comply with all applicable laws, including the Animal Welfare Act.

Our Commitment to our Stakeholders

Maintaining Accurate Books and Records

Intellia is committed to maintaining and supplying accurate books and records for all of our transactions and Company data. Our records serve as the basis for managing our business and are necessary for meeting critical obligations to our stakeholders, including patients, shareholders, customers, partners, employees, government agencies, and others with whom we do business. All of Intellia's books, records, and accounts must completely and accurately reflect our business transactions and Company data in reasonable detail. All transactions must be authorized and recorded in compliance with Intellia policies and applicable laws in a timely manner. Falsifying records and entries or misrepresenting facts or information could violate the law and result in severe penalties.

Examples of books, records, and accounts that must accurately reflect our business transactions include time sheets, bills, invoices, expense reports, contracts, accounting records, laboratory notebooks, shipping and customs records, and other essential Company data. It is important to remember that Intellia is the owner of all of the Company's records and holds full and exclusive rights to their use. No employee has, by virtue of their position or authorship or inventorship, any personal or property right to or property interest in the records, even if the employee may be named as the creator, inventor, recipient, or custodian. Intellia Personnel and Covered Third Parties must follow all applicable policies and procedures regarding creation, maintenance, access rights, storage, and destruction of Company business records. If you become aware of any departure from these standards, you have a responsibility to report it promptly.

Accuracy of Records

Intellia has legal responsibilities to make complete, accurate, and timely disclosures in all reports and documents that we file with government agencies. Financial records include those that we report publicly, such as those contained in our U.S. Securities and Exchange Commission filings, but also other internal records that contain financial information and form the foundation for our public and other official disclosures. Intellia Personnel and Covered Third Parties are prohibited from entering into a transaction with the intent to document or record it in a deceptive or unlawful manner and may not create any false or artificial documentation or book entry for any transaction entered into by the Company or on the Company's behalf. All Intellia Personnel and Covered Third Parties are responsible for playing a part in ensuring that we meet our financial reporting responsibilities by creating and submitting accurate financial reports and documents.

Maintain Complete and Accurate Scientific Records

Intellia will maintain our scientific records in accordance with all applicable laws and regulations. Scientific employees are responsible for understanding the procedures and documentation required to maintain proper records of scientific data.

Comply with Corporate Expense Policies

Intellia Personnel are expected to use good judgment regarding all expenses incurred while conducting business for the Company. Such expenses must be reasonable in the circumstances, necessary and incidental to the performance of the company business involved and, unless otherwise required by applicable law, for the primary benefit of the Company rather than the employee. Intellia Personnel will be reimbursed only for legitimate business expenses that are reasonable in amount, properly documented and consistent with corporate policies, including the [Travel and Expense Policy](#).

Ethical Interactions with Auditors

It is prohibited to directly or indirectly take any action to coerce, manipulate, mislead, or fraudulently influence the Company's independent auditors for the purpose of rendering the financial statements of the Company materially misleading. Prohibited actions include, but are not limited to, those actions taken to coerce, manipulate, mislead or fraudulently influence an auditor:

- to issue or reissue a report on the Company's financial statements that is not warranted in the circumstances (e.g., due to material violations of generally accepted accounting principles (GAAP), generally accepted auditing standards, or other professional or regulatory standards);
- not to perform an audit, review or other procedures required by such guidelines or other professional standards; or
- not to communicate relevant concerns to the Company's Disclosure Committee and/or the Audit Committee of the Board of Directors.

All Intellia Personnel have a responsibility to report observed or suspected violations of laws or regulations, this Code, any policy of Intellia and any activity that might constitute financial fraud or financial misconduct.

Records Retention

Various federal and state laws govern the retention of Intellia's corporate records. Employees are expected to have a working knowledge of the retention guidelines applicable to records under their control and to adhere to any applicable record disposal procedures.

Remember: Any business record may become public either inadvertently or as a result of a legal or regulatory process. As such, they should remain free of derogatory remarks, speculation, guesses, or other unnecessary language.

This includes emails, Teams messages, posts on the Company Intranet, recorded presentations, and any other communications made in the course of doing business.

Avoid Conflicts of Interest

The business decisions of all Intellia Personnel and Covered Third Parties should be based on your commitment to the Intellia and its best interests. A conflict of interest occurs when your private interest interferes with, or gives the appearance of interfering with, your ability to act in the best interests of Intellia. We respect the rights of Intellia Personnel to manage their personal affairs and investments. At the same time, you should avoid situations that present conflicts of interest or potential conflicts of interest. A conflict of interest does not always involve financial gains or losses but could include any situation where your outside associations or personal, business, financial, and other relationships interfere in any way with the performance of your duties to Intellia or places your personal, social or financial interests, or those of a family member or friend, before Intellia's interests. Intellia Personnel must not allow outside interests to interfere with their job duties or engage in any work, paid or unpaid, or other activities that create a conflict of interest that materially and substantially disrupts the operations of the Company.

No policy or Code of Conduct can cover all situations in which a conflict of interest may arise, and it may not always be clear when a conflict of interest exists. The essential element of all conflicts of interest is the division of loyalty, or the perceived division of loyalty, between Intellia's best interests and your interests. Keep in mind the appearance of a conflict can be damaging to your reputation or that of the Company. The selection and treatment of vendors and suppliers, and the hiring of employees is an area where you should be especially mindful of potential conflicts of interest. We must choose products and services and make hiring decisions that are in the best interest of Intellia and most importantly our partners and patients. Any conflict of interest or potential conflict of interest must be disclosed in writing to your manager for a determination of whether the requested activity may proceed, in consultation with the Legal Team. For more information, please refer to our policies on [Vendor Gifts and Entertainment Policy](#) and [Conflicts of Interest Policy](#). Members of Intellia's Board of Directors are also bound by our conflicts of interest policies and procedures.

Disclose External Board of Directors and Scientific Advisory Activities

Employees other than corporate officers may not serve on an external board of directors or serve as a scientific advisor for another company without prior approval from the Chief Executive Officer and the Chief Compliance Officer.

We Prohibit Insider Trading

There may be times in the course of your job when you come across material, nonpublic information (“MNPI”) about our Company, our products or product candidates, our partners/collaborators, or other matters relating to Intellia. Intellia policy and the laws of many jurisdictions (particularly the U.S. where Intellia’s shares are publicly traded) prohibit employees anywhere in the world, directly or indirectly through their families or others, from purchasing or selling, or otherwise engaging in any transactions involving Intellia securities while in the possession of MNPI (insider information). Securities are defined very broadly, and include stock, options, puts, calls, publicly traded debt, and stock held in a retirement savings account. It does not matter whether profit was made or losses avoided. The same prohibition applies to trading securities of other publicly held companies on the basis of insider information, including the Company’s collaborators or other parties with which the Company does business or other companies whose confidential information you may learn about in the course of your service at Intellia. Violations of securities laws, including those prohibiting insider trading, are very serious and can result in severe civil and criminal liability. You should carefully review the periodic memoranda distributed by the General Counsel that provide further guidance on Intellia’s process on appropriately engaging in transactions involving Intellia’s securities. If you have a question about engaging in any transactions involving Intellia securities, or the securities of competitors, collaborators, or other companies whose confidential information you may learn about in the course of your service at Intellia, you should contact the Compliance Officer (complianceofficer@intelliatx.com). For more information, please see our [Insider Trading Policy](#).

MNPI at a Glance

This kind of nonpublic information is something a reasonable investor would take into consideration when deciding whether to buy or sell a company’s securities. Some examples of information that may be material are:

- Results or status of a research and development or clinical program (e.g., clinical trial results).
- A proposed strategic alliance, license or collaboration with another company.
- A possible merger, acquisition, or sale of a business.
- Financial events such as equity or debt financing, financial forecasts, or financial results for the quarter or year.
- A significant expansion or cutback of operations.
- Information regarding the manufacturing, marketing, and sales of a product.

- Major personnel changes.
- Major litigation matters and developments.

Insider Trading at a Glance:

- Insider trading includes, but is not limited to:
 - Trading on the basis of nonpublic information
 - Providing “tips” to anyone or trading based on received tips.
- Trades made according to the Company's Rule 10b5-1 Trading Plan are generally allowed.
- If you are unsure about a trade, or if you are aware of anyone offering trading tips based on nonpublic information, please contact insidertrading@intelliatx.com.
- For more information, see our full [Insider Trading Policy](#).

Our Commitment to Fairness

Protect and Respect Confidential and Proprietary Information

Intellia collects, creates and uses facts and knowledge to generate the scientific and medical data essential to our success. As such, our competitive advantage depends on our proprietary and confidential scientific, technical, business and commercial information. As Intellia Personnel, you will learn of, or have access to, information about Intellia that is confidential and proprietary. It isn't just our scientific or medical data that we consider confidential. Any Intellia work product or other information you may learn of before that information is released to the general public is considered confidential. Intellia Personnel who have received or have access to confidential information should take care to protect the confidentiality of this information. While we disclose certain information publicly from time to time as required or appropriate, almost all information we use in our work is confidential information. Some of our confidential information comprises legally protected trade secrets, which may warrant additional security measures to prevent unauthorized disclosure. You are responsible for ensuring that confidential and proprietary information is treated as a valuable asset and only used, accessed or shared in a manner consistent with this Code, any policy of Intellia, and reasonably expected to maintain the confidential and proprietary nature of such information. Protecting this information is not limited to our data, but also includes the assets and information of third parties, such as our collaborators, suppliers, vendors, customers, external stakeholders, and business partners.

Because we interact with other companies and organizations, there may be times when you learn of confidential information about other companies before that information has been made available to the public. You must treat this information in the same manner as you are required to treat Intellia's confidential and proprietary information. There may even be times when you must treat as confidential the fact that we have an interest in, or are involved with, another company. You may only disclose or discuss Intellia's confidential and proprietary information in the course of your job responsibilities and with proper authorization. You should never disclose protected information to any third party unless the third party has entered into a confidentiality agreement and unless such disclosure has been approved in advance as required by the [Confidential Information and Trade Secret Policy](#).

Similarly, you may not use any confidential and/or proprietary information you have access to through your work for Intellia for personal gain or any other use inconsistent with Intellia's interests. After your tenure with Intellia, you may not use or disclose such information to others. By the same token, Intellia expects you to adhere to all confidentiality agreements and not divulge or use confidential information from prior employers (or any third parties to whom you owe a duty of confidentiality) during the course of your work at Intellia. If you have any doubt as to whether information is confidential, please consult the Legal Team before disclosing or using

any such information. Further guidance regarding your obligations with respect to confidential information can be found in Intellia's [Confidential Information and Trade Secret Policy](#).

Avoid Bribes, Kickbacks & Improper Payments

Intellia is committed to transacting business with integrity and acting ethically and legally in accordance with all applicable anti-bribery and anti-corruption laws. As part of this commitment, Intellia prohibits bribery and corruption in the conduct of our business in the United States and abroad. We do not pay bribes, kickbacks, facilitation payments, or any similar improper payments at any time, for any reason. This applies equally to any person, vendor, or firm who represents Intellia.

Anti-corruption laws prohibit making a payment and/or offering anything of value to any foreign government official or agency, political party or political candidate in exchange for a business favor or when otherwise intended to influence the action taken by that individual or to gain any competitive or improper business advantage. It is especially important to know that the prohibitions of the FCPA, UKBA and other similar laws apply to actions taken by Intellia Personnel and by all outside parties engaged directly or indirectly by the Company (e.g., consultants, professional advisers, etc.). Violations of these laws could subject the Company and its individual directors, officers, employees and designated agents to serious civil and criminal penalties. Given the severity of these penalties, all Intellia Personnel must contact the Compliance Officer (complianceofficer@intelliatx.com) with any questions concerning the Company's or their obligations under and in compliance with anti-bribery and anti-corruption laws. Should you become aware of bribes, kickbacks or other facilitation payments, raise the concern to your manager, the Compliance Officer (complianceofficer@intelliatx.com), or through the hotline. See the Intellia [Anti-Bribery and Anti-Corruption Policy](#) for more information.

Key definitions:

- Bribery means giving or receiving anything of value (or offering to do so) in order to obtain business, financial, or commercial advantage.
- Corruption is the abuse of an entrusted power for private gain.
- Facilitation payments are typically small payments to a low-level government official that are intended to encourage the official to perform his responsibilities.

It is especially important that we exercise due diligence and carefully monitor third parties acting on our behalf. We carefully screen all third parties, including suppliers, consultants, and vendors who work on Intellia's behalf, particularly when dealing in countries with high corruption rates and in any situations where "red flags" would indicate further screening is needed before retaining the third party. Third parties must understand that they are required to

operate in strict compliance with our standards and to maintain accurate records of all transactions.

Gifts to and from Third Parties

When dealing with vendors, partners, collaborators, suppliers and other third parties with whom Intellia transacts business, the exchange of gifts, gratuities or entertainment, however honest the motive, can give the appearance of impropriety. Only gifts that are nominal in value, consistent with Intellia's policies, not in cash and comply with the law may be exchanged with vendors, partners, collaborators, potential collaborators, suppliers and other persons with whom the Company conducts business. Such gifts must also be consistent with the corporate policies of the Company and the recipient's employer. Special restrictions apply to gifts/entertainment involving patients and HCP's and gifts to government employees and public officials and are addressed in other sections of this Code of Conduct. Entertainment through special events, such as golf outings, social dinner meetings, sporting events, theater visits and other social events, may not be solicited or encouraged as a prerequisite for doing business with the Company. Such entertainment may, however, occasionally be accepted when appropriate for business objectives and in compliance with the law. Decisions to accept such invitations must reflect careful consideration of the cost involved, business purpose, duration of the event and compliance with the spirit and intent of this Code. Consult the Compliance Officer (complianceofficer@intelliatx.com) if you have any questions or concerns regarding the exchange of gifts between the Company, our collaborators, suppliers or other third parties. See [Vendor Gifts & Entertainment Policy](#), [Provision of Meals, Gifts & Entertainment to Healthcare Providers Policy](#) and [Anti-Bribery and Anti-Corruption Policy](#).

Safeguard Collaborator Information

Your knowledge of confidential information about our collaborators and others with whom we do business places you in a special position of trust and confidence. Safeguarding information provided by our collaborators is essential to the development and maintenance of our long-term business relationships. Confidential information provided by our collaborators may not be shared with others outside Intellia without the prior consent of the collaborator and the Legal Team, except as required by law; and it may only be disclosed to fellow employees on a need-to-know-basis in accordance with the Company's policies. The use of confidential information about any of our collaborators to trade in their stock is prohibited under Intellia's [Insider Trading Policy](#). Nothing within this section is intended to limit an employee's ability to file a claim with a government agency or otherwise provide information necessary to pursue an investigation.

Compete Fairly

At Intellia, we compete on the value of our therapies and platforms in compliance with applicable competition and antitrust laws of countries in which we do business. We seek to

outperform our competition fairly and honestly—never through unethical or illegal business practices. Misappropriating proprietary information, possessing trade secret information that was obtained without the interested party's consent, or inducing such disclosures from people with such information, such as past or present personnel of third parties, is prohibited. Intellia Personnel are expected to respect the rights of, and deal fairly with, the Company's partners, suppliers, competitors, and personnel. Even if predicated on the Company's business interest, no employee, officer or director should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice. Antitrust laws in the U.S. and competition laws outside the U.S. exist to ensure free and open competition in the marketplace. These laws are complex and require each of us to be sensitive to certain aspects of our relationships with competitors, collaborators and suppliers.

Problem Behaviors

- Never use gifts or entertainment as a means to gain unfair advantage with a partner, collaborator or vendor.
- No gift or entertainment should ever be offered, given, or provided to a partner, collaborator or vendor, or accepted by any Intellia Personnel or Company agents (including, in each case, their family members) unless it: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is reasonable in value, (4) cannot be construed as a bribe or payoff, and (5) does not violate any laws, regulations or applicable policies of the Company or the other party's organization.
- Never exchange pricing or other proprietary information with competitors.
- Never use false or deceptive comparisons with other companies.
- Never acquire a third party's trade secrets by improper means.

Violations of antitrust laws can result in civil liability and criminal penalties for Intellia and our employees.

Comply with Global Trade Laws

Intellia operates globally. To maintain and grow our global standing, all employees, contractors, officers, and directors must strictly comply with not only U.S. laws that govern the import, export, and re-export of our products and technology, but also with the laws of other countries where our products are manufactured or used. Any violation of these laws could have damaging and long-lasting effects on our business and ability to bring our products to patients. If your responsibilities include the exporting or importing of products, technology, or supplies, you are responsible to ensure the screening of customers, suppliers, and transactions to confirm that we comply with all applicable export and import requirements.

As a company involved in global trade, Intellia's business transactions are subject to various laws and regulations that may place limits on certain exports and imports, or restrictions on doing business with certain entities or individuals. If you are involved in any global trade activities (manufacturing, importing and/or exporting), you are responsible for knowing and complying with the relevant laws and regulations, including export and import controls and trade restrictions. If you are involved in these activities, please contact the Legal Team with any questions or concerns.

Our Commitment to Our Global Community

Support Human Rights

Intellia recognizes the inherent dignity and equal and inalienable rights of every human being. Our commitment to respect and support human rights extends to all employees, third party contractors, vendors, suppliers and partners. At Intellia, we believe that operating responsibly and ethically is essential to our business. We respect human rights and are committed to preventing, mitigating, and remedying adverse human rights impacts across our value chain. We also recognize governments' duty to respect, protect, and fulfill human rights and fundamental freedoms.

Media and External Communications

We provide accurate information to all of our stakeholders. It is our policy to disclose material information concerning Intellia to the public only through specific channels and spokespeople in order to achieve a consistent voice and message when making disclosures and to ensure that such information is communicated in accordance with any applicable legal obligations. Inquiries from the general public, media, or investment community may be referred to the Corporate Communications or Investor Relations teams, who will respond or coordinate a response from the appropriate and authorized spokesperson.

In general, you can refer people outside the Company to our website, social media channels, and our press releases to find available public information about Intellia. Watch out for requests for information from the media or investors about Intellia "off the record", for background, confidentially, or secretly. Please be attuned to these and other situations that might be perceived as communicating on behalf of Intellia, especially when participating at trade conferences, medical congresses, or engaging on social media. For more information, refer to Intellia's [Corporate Communications Policy](#).

Apply Good Judgement to Social Media

Engaging on social media creates new opportunities for Intellia, but it also creates additional responsibility and potential legal and reputational risks. To ensure you're engaging responsibly, follow Intellia's [Social Media Policy](#) and keep in mind these Do's and Don'ts:

- DO NOT post or discuss any information about any of Intellia's investigational products, this includes sharing of news articles or third-party posts regarding Intellia's investigational products.
- DO NOT post information about Intellia's financial or stock performance
- DO NOT post confidential or proprietary information

- DO NOT use social media to criticize peer/competitor work in the field
- DO NOT comment on the safety or efficacy of any of Intellia's investigational products, protocols or processes
- DO share or "like" Intellia social media posts that originate from official Intellia accounts without commenting on the safety or efficacy of any of Intellia's investigational products
- DO make it clear that your posts are your own if it could be misinterpreted that you are speaking on behalf of Intellia
- DO report any comments or posts that mention adverse effects from any of Intellia's investigational products
- DO contact Corporate Communications with questions at communications@intelliatx.com

Cooperate with Government Inquiries

Intellia may be contacted by government officials for a wide range of purposes including inspections and investigations. Intellia complies and cooperates truthfully and ethically with all government agencies conducting inspections or investigations. Government officials could potentially visit our site locations or contact any of our employees at any time for purposes of an inspection or investigation. If you are contacted by any government agency or government employee, ask the point of contact for credentials and then you must notify your manager and the Legal Team immediately. When participating in an inspection or investigation, you are expected to listen carefully to requests and work with the Legal Team to provide complete and truthful information and always act ethically and responsibly. Avoid any appearance of an attempt to influence the judgment of the official. Lying to a government official could subject you to legal action, in addition to undermining our commitment to conducting business with integrity.

Nothing in this section or the Code of Conduct generally is intended to limit your ability to file a claim or provide information necessary to pursue an investigation with any government agency, including but not limited to the SEC, NLRB or EEOC.

Political Activity & Donations

Intellia is subject to laws governing corporate support for political candidates and political activities. Employees are prohibited from engaging in political activities on behalf of the Company or contributing any Company money, property, time, or services to any political candidate or political party, unless making such a contribution is permitted by law and approved by the Legal Team. No direct or indirect pressure in any form is to be directed toward employees to make any political contribution or participate in support of a political party or the political candidacy of any individual. No political contributions or expenses related to personal political participation by Intellia employees will be paid for or reimbursed by Intellia. Consistent with the law, Intellia does not restrict employees' personal participation in political activity. Any

political activity by an Intellia employee in an individual capacity must occur outside of worktime and no company resources may be used for personal political engagement.

Communication with Government Officials and Employees

Federal, state, and local laws require companies to report certain activity and expenses related to attempts to influence government action. These requirements apply to activity by anyone in the Company, not just those people who are registered lobbyists, when acting in their capacity as a Intellia employee. In order to ensure that Intellia can accurately track and report our government contacts, where required, it is important that any communication with government officials and government employees be approved beforehand by a vice president within your organization who is responsible for ensuring coordination with the Legal Team. All incoming contacts by elected officials or their staff should be directed to the Communications and Legal Teams.

Please be attuned to situations that might be perceived as communicating on behalf of Intellia, especially when participating at trade conferences or medical congresses. You must not engage with government employees present unless authorized.

Good Corporate Citizenship

We believe in making a positive difference in people's lives and maintaining the health and welfare of the communities where we live and work. We promote, encourage, and support a diverse range of corporate social responsibility activities. Everyone is encouraged to get involved in the many initiatives we support.

Protecting the Environment

We are committed to sustainability and to minimizing damage to the environment as well as any potential harm to the health and safety of employees, customers, and the public. Below are actions you can take to protect employee safety and the environment:

- Stop work and report any situation that you believe could result in an unsafe working condition or damage to the environment.
- Read and understand all the information that Intellia provides that is relevant to your job and the health, safety, and environmental effects of our operations.
- Fully cooperate with environmental, health, and safety training and with Intellia's periodic compliance reviews of our products and operations.
- Be proactive and look for ways that we can minimize waste, energy, and use of natural resources.
- Follow all applicable environmental laws and regulations. If you are uncertain of your responsibilities, consult with your manager or the EHS team for further support.