



## GLOBAL POLICY ON INTERACTIONS WITH EXTERNAL STAKEHOLDERS

The purpose of this policy is to establish the general framework for the relations between Intellia and our External Stakeholders, including:

- Requirements for All Interactions
- Prohibition on Preapproval Promotion
- Scientific Exchange and Non-promotional Communications
- Adverse Event Reporting
- Data Privacy
- Grants, Sponsorships, and Charitable Donations
- Service Arrangements
- Meals, Gifts, and Entertainment
- Market Research
- Implementation



Ethical relationships with External Stakeholders are critical to our mission of developing CRISPR-based therapies for people with severe diseases. The success of our mission depends on working with various External Stakeholders, including:

- Healthcare professionals (HCPs)
- Healthcare organizations, such as hospitals, clinics, and charitable organizations
- Patients
- Caregivers
- Patient organizations

These persons and organizations understand the needs of patients and the performance of medicines in the clinical setting in unique and essential ways.

The key role that these External Stakeholders have in our mission means that our interactions with them must be free of any undue influence on:

- Medical judgment
- Treatment recommendations
- Clinical trial outcomes

In fact, we must avoid even the *appearance* of such undue influence.

## WHAT IS A HEALTHCARE PROFESSIONAL (HCP)?

Any person or entity capable of directly or indirectly:

- Prescribing, supplying, administering, purchasing, recommending, reimbursing, paying for, or acquiring a medicine.

HCPs also include anyone who influences or authorizes any of the above, as well as:

- Health service managers and administrative or clinical staff that support HCPs
- Any employees of any entity that is owned by or comprised of HCPs



## SCOPE



This policy applies to anyone at Intellia Therapeutics, Inc. who interacts with External Stakeholders. This includes all employees, officers, directors, third party vendors, and contractors. The policy governs specifically our interactions with these stakeholders related to:

- Research and development
- Medical engagement
- New product planning

It also defines when and how it is acceptable to provide External Stakeholders with payment or other benefits.

When we engage with contract research organizations, logistics vendors, and meeting planning groups, as well as others to act on our behalf, this policy applies to their work on our behalf.





Our relationships with External Stakeholders are subject to regulations intended to ensure our activities benefit patients and enhance the practice of medicine. For this reason, interactions must support the development of new therapies and improved decision-making by health care professionals and other External Stakeholders.

### REQUIREMENTS FOR ALL INTERACTIONS

All of us at Intellia have the responsibility to ensure that those who work on our behalf manage their interactions with us in accordance with:

- Our Code of Conduct and all Intellia policies and procedures
- Any applicable policies of a stakeholder's employer
- All applicable laws and regulations

Where local laws, regulations, industry codes of practice, and policies set higher standards, we must follow the rules enforcing the higher standards rather than Intellia policy.

### PROHIBITION ON PREAPPROVAL PROMOTION

Prior to regulatory approval, we must not promote or make any promotional claim about an investigational product, including that the product is safe or effective in any way. However, in appropriate scientific contexts, we may provide information about our technology and products as part of "scientific exchange" with certain External Stakeholders.

### SCIENTIFIC EXCHANGE AND NON-PROMOTIONAL COMMUNICATIONS

"Scientific exchange" means that the exchange of information must further scientific inquiry. The communication must be truthful and not misleading,

complete, and balanced, and it must have no promotional intent whatsoever. The communication must also **make it clear** that any investigational products mentioned have not been approved by regulatory authorities.

Scientific exchange and other non-promotional communications include:

- **Publications and scientific presentations.** These are scientifically important communications, owned by Intellia Scientific, Clinical, and Medical personnel developed in accordance with **POL-500 (Publications Policy)**. Such information would typically appear in a peer-reviewed journal or a scientific session of a medical congress. They must be reviewed under **SOP-500 (Program-Related Scientific and Medical Publications)** or **SOP-510 (Non-Clinical Platform and Scientific Presentations, Partner-led Publications, and Speaking Engagements)**.
- **Responses to medical information requests.** This is medical information about Intellia's research, investigational products, and therapeutic areas of interest. Intellia Scientific, Clinical, and Medical personnel must respond to these unsolicited requests with an appropriate and scientifically rigorous answer to the specific question asked. These responses must be reviewed under **SOP-505 (Medical and Scientific Materials Review)**.



- **Communications with investors and the media.** We may communicate information to investors and the media about the results of our clinical studies and regulatory milestones according to [POL-200 \(Corporate Communications Policy and Procedures\)](#). In doing so, we must follow our scientific exchange principles.

#### WHAT ARE SCIENTIFIC EXCHANGE PRINCIPLES?

When communicating scientific information, we make sure our statements:

- Provide appropriate context, such as description of study design, study limitations, and related data
- Use scientific language
- Never have promotional intent – avoid express or implied claims
- Include a balanced discussion of safety information
- Are truthful and not misleading

- **Communications with contracted advisors.** We may present non-promotional information that is directly relevant to a service arrangement with advisors, but only to the extent it is required for the service activity.
- **Communications unrelated to Intellia activities:** With manager approval, Intellia employees may participate in external non-promotional speaking engagements and contribute to publications relevant to their expertise. Such communications must not disclose Intellia confidential information. They should also include appropriate disclaimers that the views

expressed are those of the individual and may not represent the views of Intellia.

#### ADVERSE EVENT REPORTING

Any employee, officer, director, vendor or contractor who learns of an adverse event (AE) involving an Intellia product must report the AE within 24 hours of learning of the AE regardless of the source of the report. Possible report sources include HCPs, patients, and social media.

Report AEs to Intellia's Drug Safety and Pharmacovigilance (DSPV) Department by calling +1-857-285-6200 and selecting option #6. Refer to [POL-502 \(Adverse Event Reporting\)](#) for more detailed reporting requirements.

#### DATA PRIVACY

According to our [POL-400 \(Global Privacy Policy\)](#), we collect, process, handle, and protect personal data in a fair and lawful manner, including:

- Providing privacy notices and obtaining required consent when we collect personal data
- Restricting the use, access to, and retention of personal data to the legitimate purposes for which it was collected
- Honoring individual rights regarding data requests

We also maintain reasonable administrative, technical, and physical safeguards designed to protect personal data.

We must report a suspected or actual security incident to [privacy@Intelliatx.com](mailto:privacy@Intelliatx.com).

#### GRANTS, SPONSORSHIPS, AND CHARITABLE DONATIONS

We may fund research, education, and charities, but we must avoid any improper influences, including activities that may:

- Influence clinical trial results.
- Influence those who receive the funds to prescribe, use, purchase, recommend, or sell any Intellia product

All funding must be transparent. Only legitimate organizations with a record of reliability and ethics may receive funding. Funding must not compromise the organization's independence or interfere with its services. All third-party funding requests must be submitted, reviewed, and funded consistent with [POL-501 \(Grants, Sponsorships & Charitable Donations\)](#).

#### RESEARCH GRANTS

We extend research grants for research that provides valuable scientific and clinical information, improves medical care, and leads to new treatments, under the following conditions:

- No one at Intellia may be involved in the design, planning, or execution of the research.
- Our support must comply with applicable regulations.
- Neither the grant recipient nor any investigator may bill any study subject or any third party for an Intellia product that we provided free of charge.
- Research grants must not be used for ordinary operating expenses or to support research that has already been done.

### EDUCATIONAL GRANTS

We extend independent educational grants to advance the understanding of medical, scientific, professional, and policy topics. We may not influence the development of any educational program, including the selection of speakers or program content. Grant recipients must be qualified to carry out the program, and the amount of the grant must be reasonable and justified.

### CHARITABLE DONATIONS

We support charities that are consistent with our mission and areas of giving, supporting indigent care, patient education, public education, public health, and other corporate initiatives. We may not make donations in the name of a specific External Stakeholder, and we will not contribute to a “favorite charity” of an External Stakeholder at the individual’s request.

### SPONSORSHIPS

We sponsor medical, scientific, and patient conferences organized by third parties. These conferences must:

- Exist to facilitate scientific exchange or medical or patient education and must be held in venues that support those purposes
- Have other sponsors – we must not be the sole sponsor

Approval of all exhibits and materials distributed at the conference must be in compliance with [SOP-505 \(Medical and Scientific Materials Review\)](#).

### SERVICE ARRANGEMENTS

External Stakeholders also provide expert services, such as providing advice on research and clinical trial activities, training Intellia colleagues, and speaking at conferences. Service arrangements with study sites and investigators for Intellia clinical trials must follow specific R&D processes, including [SOP-0185 \(Investigator Screening & Debarment\)](#) and [SOP-0249 \(Clinical Trial Site Identification, Qualification and Selection\)](#). All other arrangements must comply with [SOP-503 \(Healthcare Provider Service Arrangements\)](#).

The key requirements for a service arrangement are as follows:

- There must be a documented legitimate business need.

#### WHAT IS A LEGITIMATE BUSINESS NEED?

In our case, a business need generally refers to the resources needed for carrying out our mission to develop CRISPR-based therapies for people with severe diseases. The services must be specifically and clearly needed for Intellia to perform an activity that furthers our mission. That is, the service arrangement must never be a pretext to induce others to use, prescribe, purchase, or recommend an Intellia product or to influence the outcome of a clinical trial.

- **Participants selected must address the business need.** The participants must be selected based upon their education, expertise, knowledge, and experience in the medical or scientific area for which they are engaged, and they must not be otherwise disqualified. Intellia will not engage more participants than necessary to meet the need.

#### WHAT DOES “DISQUALIFIED” MEAN?

- Debarred by the FDA or relevant regulatory authority
- Declared ineligible to participate in government healthcare programs

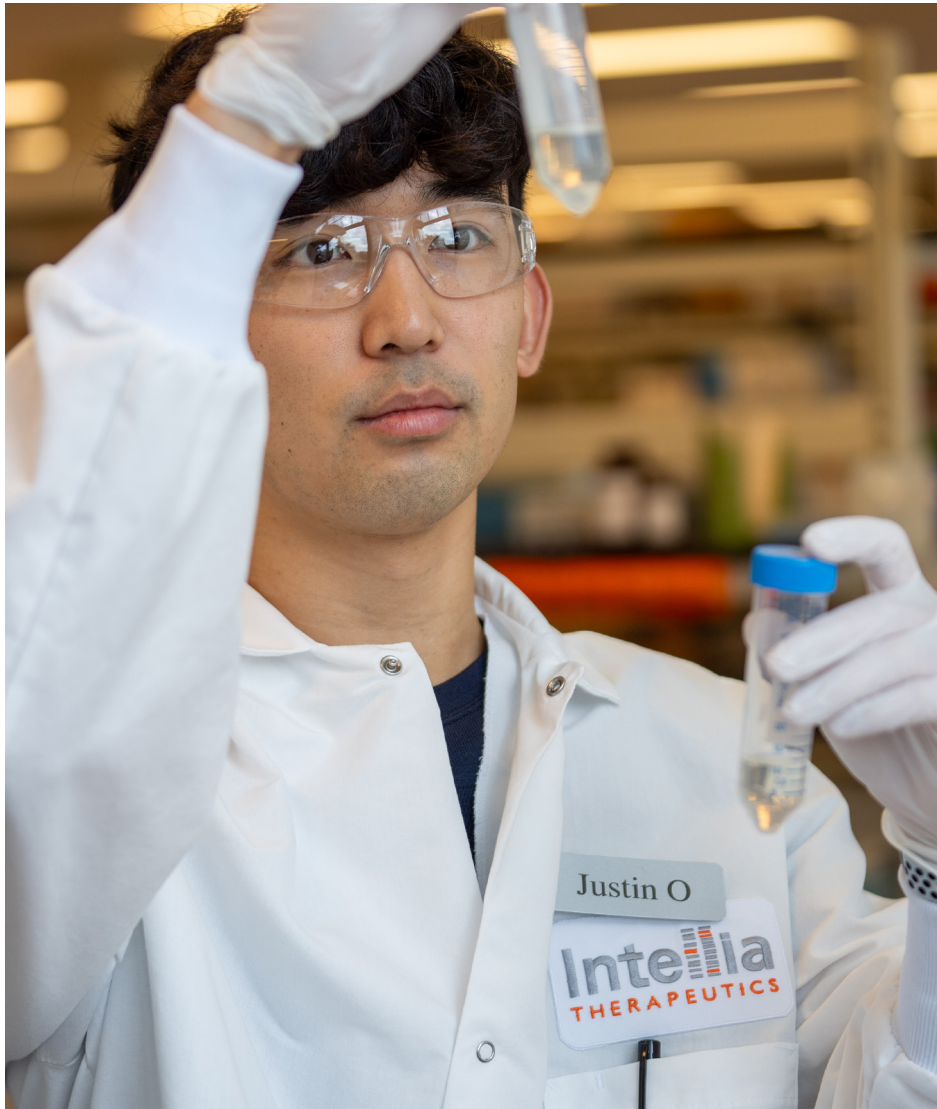
- **Compensation must not exceed fair market value.** Fair market value is based on the expertise, location, and qualifications of the participant. Any exception requires preapproval of Legal.

#### WHAT IS FAIR MARKET VALUE?

It is a hypothetical value of a property or service in an exchange between a buyer and seller who are in an open and unrestricted market and are both:

- Willing and able to make the exchange
- Acting independently without any compulsion or influence
- Reasonably knowledgeable of the relevant facts

- **A mutually signed written agreement must be in place.** Before the start of services, both parties must sign a written agreement that specifies:
  - The services or deliverables to be provided
  - The fee and the duration of the services
  - A description of the compliance obligations of the participants
  - A requirement for the participants to adhere to the disclosure requirements of their employer or other affiliated healthcare or scientific institution or committee



- **The venue must be appropriate.** The venue must serve the business purpose of the arrangement and be otherwise commercially reasonable.
- **Expenses to be reimbursed must be reasonable.** They may include travel expenses consistent with our [POL-301 \(Travel and Expense Policy\)](#).

#### WHAT EXPENSES ARE NOT COVERED?

Intellia will not reimburse participants for expenses deemed unreasonable, such as extended stays prior to or after a business meeting or for travel costs for spouses or guests.

- **Information shared must be necessary for the services.** It must be presented on a need-to-know basis, and the information to be presented must be reviewed under the applicable Intellia review process.
- **Output and deliverables must be retained.** Intellia keeps all work product and expertise obtained from the arrangement. Payment is generally made after performance. Any exception requires Legal preapproval.
- **Consulting activities with national or local government employees often come with additional restrictions.** Due to public funding of health systems outside the U.S., many non-U.S. HCPs are considered government employees. So, all arrangements that involve government employees or non-U.S. HCPs require consultation with Legal. All such arrangements must also comply with [POL-806 \(Anti-Bribery & Anti-Corruption Policy\)](#).



## MEALS, GIFTS, AND ENTERTAINMENT

Our interactions with External Stakeholders are professional in nature and intended to facilitate Scientific Exchange. To ensure the appropriate focus of this exchange, we must not offer or provide gifts, entertainment, or recreational activities to External Stakeholders under any circumstances or in any locality. Unless restricted by law or our policy, we may occasionally provide food or beverages to External Stakeholders as a business courtesy. The value must be modest by local standards and incidental to the interaction. Refer to Intellia [POL-504 \(Provision of Meals, Gifts and Entertainment to Healthcare Providers\)](#) for more detailed requirements including meal limits.

## MARKET RESEARCH

We conduct market research with External Stakeholders to inform and guide our business decisions. The following requirements apply to this research:

- The market research must address a legitimate business need. It must not be used as an opportunity to promote approved or investigational products.
- The number of participants must not exceed the number necessary to achieve the market research objectives.
- The participants must be selected based on qualifications and expertise relevant to the purpose.
- The participants must be compensated consistent with fair market value.
- All market research activities must follow [POL-601 \(Market Research Policy\)](#).

## IMPLEMENTATION

If you know or believe that there has been violation of this policy, it's your responsibility to report it. You may report violations by emailing the Compliance Officer ([complianceofficer@intelliatx.com](mailto:complianceofficer@intelliatx.com)). You may use our global independent third-party compliance hotline (+1-844-417-8866) to report anonymously. Consult [POL-801 \(SpeakUp Policy\)](#) for additional reporting guidance.

