

# Amicus Code of Conduct

*The Guide to Our  
Culture and Values*



*Performance with High Integrity*

# FOREWORD

Amicus Therapeutics, Inc. and all of its worldwide affiliates (“Amicus”) are committed to conducting business with high integrity and in full conformance with the law. As part of that commitment and consistent with our Belief Statement, this Code of Conduct sets forth the rules that apply to Amicus employees, contractors, executive officers, and directors (each an “Associate,” and collectively the “Associates”). In addition to the Code, Amicus has a compliance infrastructure of policies and standard operating procedures to which Associates must comply based on their job responsibilities or contracted services. Because we operate in many countries around the world, it is possible that a local law may occasionally differ from the rules in our compliance infrastructure. If you notice any such conflict, please notify the Compliance Department and always follow the more stringent rule.

We have organized the Code based on our commitment to four Core Principles which drive our company’s mission and vision – namely, our commitment to patients, to employees and our company, to shareholders, and our commitment to communities.

Please take the time to read this Code as often as needed to make its commitments a part of your daily activities.

## OUR CORE PRINCIPLES:

- **COMMITMENT TO PATIENTS**
- **COMMITMENT TO EMPLOYEES AND OUR COMPANY**
- **COMMITMENT TO SHAREHOLDERS**
- **COMMITMENT TO COMMUNITIES**

# LETTER FROM OUR CHAIRMAN & CHIEF EXECUTIVE OFFICER

Dear Amicus Associates,

Every day we must live by our values. This Code serves as the foundation that guides and informs the manner in which we conduct our business activities across the world. While the Code does not provide detailed information regarding each of the topics it covers (that detailed information is found in our policies and SOPs), our Code is a critical document that explains our broad values and our commitment to a culture of compliance.

I ask each member of the Amicus team to embrace the spirit of our Code and to commit to a strong culture of compliance. Read the Code. Refer to it. Discuss it with your colleagues. Absorb the Code's meaning, purpose, and spirit – and let that spirit guide you every day in the way you conduct business. And if you see something that conflicts with the values in our Code, I ask that you speak up through one of the reporting avenues described here.

The passion that drives each of us at Amicus is very clear. I am proud that together we will bring new and improved medicines to people living with rare diseases. By making the values of our Code an integral part of our daily work, we will make good on our promise to patients through a sustainable company of which we can all be proud.

Sincerely,

A handwritten signature in black ink that reads "John". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

John F. Crowley

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## 1. INTRODUCTION

### 1.1 Why Do We Need a Code of Conduct?

A company's Code of Conduct ("Code") is like a country's constitution. It establishes foundational rules and values. In our Code, the most important principle is that we always comply with the law - in word and in spirit. We are proud of being a performance driven company, but equally proud that our performance is always achieved with integrity. The reason for this is simple: performance without integrity is not success. Nor is it sustainable. Our Code is important because it sets down in writing the foundations of our compliance culture and our commitment to never prioritize short-term profit over sustainable long-term success.

### 1.2 Who Must Follow Our Code of Conduct?

Ethics is everyone's responsibility, and this Code is one of the ways we communicate to all Associates the clear expectation of the Amicus Board of Directors and Senior Leadership Team that all Associates must perform company activities with integrity and in compliance with applicable global laws. Integrity is not just about the big decisions we make as a company. It is the sum total of all the small decisions each of us makes every day that adds up to a culture of compliance.

Our Code sets down in writing the foundations of our compliance culture and our commitment to never prioritize short-term profit over sustainable long-term success.

By role modeling compliance with the Code in their daily activities and decision making, managers play a critical role in living and promoting our culture of compliance. Managers

must ensure the employees and contractors they supervise timely complete all assigned training on this Code and all other company policies and Standard Operating Procedures ("SOPs") applicable to them. Managers must also encourage Associates to immediately speak up whenever they know or suspect a violation of this Code or the law.



At Amicus, we also contractually require the individuals and companies we hire to fully comply with the law in all their activities on our behalf. Remember, when working with third parties, we can never ask or permit such third parties to do anything that we could not do ourselves.



### 1.3 How to Raise Questions and Concerns?

If you know or suspect a violation of the Code or the law, it is your duty to speak up. There are a number of ways you can raise a concern. Although we encourage you to speak directly to someone in Compliance, Legal, Human Resources, or to your direct manager, we understand there are instances where you may feel an anonymous report is required. If that is the case you can trust that if a report is made anonymously, it will remain anonymous – no one will attempt to find out who made the report. You can also trust that there is no retaliation for making a report.



Anonymous reports can be made through our Global Hotline. All of our toll-free hotline numbers are easily accessible on the front page of our intranet – the FOLD – by pressing the “Hotline Button.” Hotline reports can be made either by calling the toll-free U.S. number if you are dialing from within the U.S., or by calling the country-specific toll-free number if you are calling from one of our operating countries

outside the U.S. You may also make a report electronically through the Hotline’s web-portal ([www.amicusrx.ethicspoint.com](http://www.amicusrx.ethicspoint.com)). Both methods of submitting a report are available 24 hours a day, seven days a week, and are routed through our Global Hotline vendor, EthicsPoint.

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Amicus takes violations of our Code and the law very seriously. All allegations of wrongdoing will be promptly and thoroughly investigated. Investigations are conducted as confidentially as possible, subject to the Company’s need to share information for investigative purposes and consistent with applicable law.

### 1.4 What is Our Promise of Non-Retaliation?

Seeking advice, raising concerns, or reporting misconduct cannot and will not be held against you. Our open door and anti-retaliation policies are in place to encourage and protect Associates who raise concerns. Remember, by truthfully reporting a concern, you are helping the company. If we investigate your concern and no misconduct or legal violation is uncovered, then your report gave us the opportunity to be sure there is no violation. If on the other hand



we investigate your concern and we do uncover misconduct or legal violations, then your report will have helped the company to identify and put an end to that misconduct and to remediate any violations.

Our promise to you is that if an individual, regardless of his or her title or role, is determined to have retaliated against an Associate who has truthfully and in good faith reported a potential violation, Amicus will take appropriate disciplinary action against that retaliator, up to and including termination of employment as permitted by local law. If you suspect that you have experienced or witnessed an act of retaliation, please report your concern promptly to the Compliance, Legal, and/or Human Resources Department. You may also report retaliation anonymously through our Global Hotline.





## 2. COMMITMENT TO PATIENTS

At Amicus, everything we do is done first and foremost to help improve the lives of people living with a rare disease. This means understanding patients' medical needs through active listening, innovation through best-in-class science, delivering a safe and consistent supply of product, engaging in truthful and non-misleading communications with healthcare practitioners about our products, and transparently disclosing our science-driven relationships with those practitioners to patients and the public.

### 2.1 Patient Advocacy Organizations

Patients and the advocacy organizations that represent them are at the heart of everything we do. It is the mothers, fathers, sons, and daughters – the real people who live with rare disease – who are the focus and beneficiaries of our work. To do that great and meaningful work we need to be great listeners and learners.



We need to understand the true burdens of the individuals, families, and caregivers living with the rare diseases we seek to alleviate, and to grasp the medical needs of those rare disease communities. That understanding in turn informs and energizes everything we do. Such is the foundation and premise for our interactions with patient advocacy organizations.

At the same time, we are committed to complying with the global pharmaceutical laws and industry codes that regulate our interactions with patient advocacy organizations and have developed policies and SOPs to help guide those interactions. Associates who interact with patient advocacy organizations on behalf of Amicus must comply with those policies and SOPs which are trained upon and available on the Amicus intranet under “Corporate Operations/ Compliance/Policies & SOPs.”

### 2.2 Patient Safety

As a patient-centric and science-driven organization, we must ensure that every decision we make is fully compatible with the imperatives of patient safety and data integrity. These imperatives apply at every stage during the lifecycle of our products. During research and development, the safety of patients participating in our clinical trials is paramount, and we conduct such trials in full conformity

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with Good Clinical Practice (GCP) standards and the oversight of a qualified institutional review board or independent ethics committee. Patient safety remains paramount when we manufacture and distribute our products, which is why we conduct such activities in full conformity with



Good Manufacturing Practices (GMP) and our own rigorous internal quality standards. Also, at every phase and in every aspect of our business, we are firmly committed to data integrity so that our Amicus data can always be relied upon by all stakeholders as accurately, truthfully, and fully representing our science. Without these commitments to patient safety and data integrity, our science and work would be without value.

Amicus has developed policies and SOPs to ensure our compliance with good quality practices such as GCP, GMP, Good Laboratory Practices (GLP), Good Distribution Practices (GDP), and Good Pharmacovigilance Practices (GVP), all of which are trained upon and available through the Amicus intranet under “Common Internal Links/MasterControl.”

### 2.3 Interactions with Healthcare Professionals

In order to provide the best possible care to patients, Amicus provides the medical community with up-to-date information about its products at scientific congresses, during office visits, and at other appropriate venues. Amicus also interacts with healthcare professionals as part of its clinical research programs. In all such interactions, Amicus is committed to providing science-based, truthful, and non-misleading information about its products, and to paying no more than fair market value for needed and legitimate services such as research and consulting.

Amicus has several policies and SOPs that govern our relationships with healthcare practitioners. Associates must comply with these policies and SOPs, which are trained upon and are available on the Amicus intranet under “Corporate Operations/Compliance/Policies & SOPs.”

Amicus is committed to providing science-based, truthful, and non-misleading information about its products, and to paying no more than fair market value for needed and legitimate services



## 2.4 Transparency

A growing number of countries around the world are adopting laws that require companies to make public the level of funding they provide to healthcare practitioners and to healthcare organizations, such as for research and consulting. One of the purposes of these laws is to make transparent to patients whether their own healthcare practitioners have received any funding from industry, and if so, how much, from whom, and for what purpose.

Amicus is committed to complying with such transparency laws and with the transparency codes of the pharmaceutical industry associations of which it is a member. Amicus policies and SOPs regarding transparency are trained upon and available on the Amicus intranet under “Corporate Operations/Compliance/Policies & SOPs.”





### 3. COMMITMENT TO EMPLOYEES AND OUR COMPANY

The foundation of our commitment to one another is based on respect. We treat each other respectfully, the company treats us fairly, and we act in the company's best interests through our dedicated work and by safeguarding the company's records, assets, and reputation.

#### 3.1 Discrimination and Harassment

We each play an important role in creating an open and inclusive workplace, where every individual is able to fully contribute to our success. Building a talented and diverse workforce strengthens our company and its competitive advantage.

To champion these important values, we must:

- Treat others fairly and with respect;
- Avoid actions that could be considered bullying or harassment;
- Focus solely on a person's qualifications, abilities, experience, and performance if we are responsible for hiring, firing, compensation, promotions, or employee discipline.

Amicus has developed policies and SOPs on this topic which are trained upon and available on the Amicus intranet under "Corporate Operations/ Human Resources/HR Policies & Procedures."

#### 3.2 Labor Practices

Upholding human rights is a direct reflection of our commitment to ethical business practices. Amicus is committed to providing all Associates with fair and competitive wages in exchange for high performance conducted with high integrity. We comply with the wage and labor laws of every country in which we operate, and will never use

child or forced labor in our operations. Should we become aware of suppliers who violate these principles, we will terminate our relationship with them as their association with us is a reflection on our ethics. If you have reason to believe anyone we work with is violating these standards, please inform the Human Resources Department at once.

Amicus has developed policies and SOPs on this topic which are trained upon and available on the Amicus intranet under "Corporate Operations/ Human Resources/HR Policies & Procedures."





### 3.3 Data Privacy and Personal Information

We all have a responsibility to protect the personal information of our colleagues and of the healthcare practitioners, patients, and other third parties with whom we work and interact. Even within Amicus, personal information can only be shared with those who need it to perform their job. This is central to a fair and respectful working environment.

Amicus has developed policies and SOPs on this topic which are trained upon and available on the Amicus intranet under “Corporate Operations/Compliance/Policies & SOPs.”

### 3.4 Health, Safety, and Environment

Absolutely nothing justifies putting your well-being or that of a colleague at risk. Not workplace deliverables, not overtime pay, not profits. Because we value the health and safety of our Associates above all else, we are committed to workplace safety and promoting wellness. No matter where you work or what your job is, put safety first. Our focus on safety includes a commitment to providing a workplace that is free of violence, threats, and intimidation. And because our work requires alertness, accuracy,



and clarity of mind, Associates are expected to perform their duties free from the influence of drugs and alcohol, which have no place in our work environment.

We value the health and safety of our Associates above all else. No matter where you work or what your job is, put safety first.

Consistent with our commitment to health, safety, and the environment, we have developed policies and SOPs on these topics which are trained upon and accessible through the Amicus intranet under Common Internal Links/MasterControl as well as through the Amicus intranet under “Corporate Operations/Human Resources/HR Policies & Procedures.”

### 3.5 Protecting Company Physical and Intellectual Property

Each of us is responsible for acting in the company’s best interests by protecting its physical assets and intellectual property. Without those physical assets, like computers, laptops, cell phones, office supplies, and lab equipment and supplies, we could not do our work each day. Even more crucial is our intellectual property, which is irreplaceable. Intellectual property includes copyrights, patents, trademarks, product and package designs, brand names and logos, research and development, inventions and trade secrets.



To protect our physical and intellectual property, we must:

- Only use company property for legitimate business purposes;
- Be extra vigilant with company property while traveling;
- Report any known or suspected theft or fraud immediately to our supervisor and the Compliance Department;
- Never discuss proprietary information in places where we can be overheard;
- Never provide proprietary information to third parties, including business partners and vendors, without appropriate authorization and any required confidentiality agreements. If in doubt, check with the Legal Department first;
- Never provide physical materials such as small molecules, biologics or other physical research materials to third parties, including business partners and vendors, without appropriate authorization and any required Material Transfer Agreements (MTAs). Contact the Legal Department to negotiate MTAs with third parties.

### 3.6 Confidential Company Records and Information

Acting in the company's best interests includes safeguarding the confidentiality of all non-public information entrusted to us by Amicus and its customers and suppliers. Confidential Information is information that might benefit competitors and hurt Amicus if disclosed. Information that the company has made public, such as information presented in press releases, at scientific or investor conferences, or in advertisements, is not Confidential Information.

Here are some examples of Confidential Information:

- Information about our small molecules and biologics, manufacturing processes, undisclosed pre-clinical and clinical research, and technical data;
- Commercial information such as customer information, pricing, and marketing plans;
- Actual and proposed business plans and strategies;
- Financial data;
- Information related to employees.



To protect our Confidential Information, we must follow the same precautions described in section 3.5, above. Remember that your confidentiality obligations continue after you leave Amicus, and that all Amicus Confidential Information must be returned before you leave.



### 3.7 Accurate Record Keeping

Accurate records are critical to making sound business decisions. Investors and the public count on Amicus to use and provide accurate information so they can make informed decisions. Our books and records must correctly reflect all of our transactions and activities. These records include financial statements, bills, invoices, expense reports, payroll and benefits records, time sheets, research and manufacturing records, performance evaluations, safety-related records, and other essential Company data.

Creating and maintaining accurate books and records means:

- Never falsifying a record or trying to hide the true nature of a transaction;
- Never trying to bypass internal controls and procedures, even if you think it would be harmless or save time;
- Never hiding or destroying records to avoid disclosure in legal or government proceedings;
- Always cooperating with Amicus' internal and external auditors and being honest with them;
- Always following instructions received from the Legal Department to retain documents, such as required holds in ongoing or anticipated litigation, government investigations or audits.

Accurate records are critical to making sound business decisions. Investors and the public count on Amicus to use and provide accurate information so they can make informed decisions.

### 3.8 Conflicts of Interest

We must always be transparent about our outside activities and relationships. A Conflict of Interest occurs when our private interests or actions interfere – or appear to interfere – with the interests of the company. Many times conflicts can be avoided or resolved through open and honest discussion.

To appropriately deal with real or apparent conflicts, we must:

- Recognize situations and personal relationships that might make it hard for us to be objective;
- Refrain from holding outside employment or business dealings that could interfere with the performance of our job at Amicus;
- If at any time we think we may have a potential or actual conflict of interest, we must disclose it promptly to the Compliance Department.

Amicus has developed policies and SOPs on this topic which are trained upon and available on the Amicus intranet under “Corporate Operations/ Human Resources/HR Policies & Procedures.”



## 4. COMMITMENT TO SHAREHOLDERS

We protect the investments made by shareholders in our business by not putting those investments at risk.

### 4.1 Pharmaceutical Laws and Regulations

Our goal is to create first-in-class and best-in-class treatment options for people living with rare disease. It is the passion that unites us and inspires us at work. To accomplish this goal, we must wisely and expertly put to work the investments we get from our shareholders. This includes making sure those investments are never put at risk by legal proceedings such as government investigations that could result in large fines and other sanctions that could



compromise the sustainability of our company and by extension our commitments to patients and shareholders. To ensure the sustainability of our enterprise and to make good on our promise to patients and shareholders, Amicus is committed to high performance with high integrity, which means we comply with all pharmaceutical laws and regulations in every phase of our work from research and development, to manufacturing, to marketing, promotion, and distribution.

### 4.2 Anti-Bribery and Anti-Corruption

Our commitment to shareholders includes complying with all anti-bribery laws and competing solely on the merits of our products while never engaging in any form of bribery or corruption – regardless of local practice or custom. Such laws include the US Foreign Corrupt Practices Act and the UK Bribery Act. It is important to know that in addition to these important laws almost every country in the world has its own anti-bribery law, so no matter where in the world you conduct business there is a law prohibiting bribery that applies to you. While the language in these laws may vary, their central message is always the same: it is against the law to offer anything of value to win or retain business.

Amicus has developed policies and SOPs, including a Global Anti-Bribery Policy, which are trained upon and available on the Amicus intranet under “Corporate Operations/Compliance/Policies & SOPs.”

### 4.3 Fair Competition and Antitrust

We compete for business aggressively, honestly, and solely on the merits of our products. Fair competition laws protect consumers from inflated prices that can arise from unfair business practices such as agreements between competitors.



Never communicate with a competitor about:

- prices, costs, or terms or conditions of sale;
- allocating markets, products, customers, or suppliers; and/or
- boycotting customers or suppliers.

It is every Associate's responsibility to comply with the competition laws of the country in which they operate.

#### 4.4 Insider Trading

We never take personal advantage of the information we gain from our privileged position within the company. Information that would likely affect the price of Amicus stock if it became known to the public is called Material Non-public Information. Associates who become aware of Material Non-public Information are 'insiders' and must not seek to enrich themselves by trading on such information. Doing so could be considered a violation of insider trading laws.



When we are an insider, we must:

- Follow all blackout restrictions and guidelines that apply to our trades of Amicus securities;
- Never buy or sell Amicus securities until the material information has been publicly released by Amicus;
- Never share Material Non-public Information with anyone else, including colleagues, family members, and/or friends.

It is every Associate's responsibility to comply with the competition laws of the country in which they operate.

Amicus has developed policies and SOPs, including a Policy on Insider Trading, which are trained upon and available on the Amicus intranet under "Corporate Operations/Compliance/Policies & SOPs."

#### 4.5 Government Investigations

We cooperate fully with government requests for information, facility inspections, and investigations. Please contact the Legal Department immediately to discuss the appropriate handling of government visits and investigations as well as all government requests for Amicus records (other than routine requests that are a normal part of your job).





## 5. COMMITMENT TO COMMUNITIES

Amicus aims to make a positive difference for the communities in which it operates and with whom it interacts.

### 5.1 Charitable Contributions and Donations

Amicus is pleased to support legitimate and worthy causes in the community when requested by charitable, non-profit organizations.

To ensure that all funding we provide, in cash or kind, is in line with our mission, values, and the law, we have implemented policies and SOPs which are trained upon and available on the Amicus intranet under “Corporate Operations/ Compliance/Policies & SOPs.”

### 5.2 Media Relations

As a public company, Amicus is subject to rules and guidelines concerning our public disclosures of information. We communicate honestly, accurately, and timely with shareholders, securities analysts, and the media, avoiding selective disclosures that would give some parties an unfair advantage. Only certain individuals are authorized to speak on behalf of Amicus.

### 5.3 Protecting the Environment

Amicus is committed to operating in a way that respects and protects the environment wherever we are located. We will not compromise environmental values for profit or production. We respond truthfully and responsibly to questions and concerns about our environmental actions and the impact of our operations on the environment.

Amicus has developed policies and SOPs on this topic which are trained upon and available through the Amicus intranet under “Common Internal Links/MasterControl.”



## 6. CONCLUSION

The most important take away from our Code is that we want a culture of performance with high integrity at Amicus. Put simply, we will never compromise integrity to hit any performance indicator - whether production quotas, sales targets, or anything else. This is the clear expectation of our Board of Directors and our Senior Leadership Team. It is the essence of who we all want to be.

This Code has been adopted by the Board of Directors of Amicus (“Amicus Board”) and applies globally to all Associates. It is effective as of August, 2016.