



# CODE OF CONDUCT

# OUR COMMITMENT

At Harmony Biosciences, our goal is as much about delivering innovative therapies that improve the health of people living with rare neurological diseases as it is about listening to them and infusing their lives with the hope, dignity, and confidence that comes from knowing we care.

Our greatest opportunity will always be to improve the lives of patients, understand their needs, and support the providers and people who care for them.

***Patients are at the heart of everything we do. We listen. We learn. We lead.***

Harmony is an extraordinary company with extraordinary people pursuing an extraordinary mission – a mission to bring hope to patients who are living with rare neurological conditions via the introduction of new, innovative medicines that address unmet medical needs and through the energy, commitment, expertise, and heart of our employees. Whether you are brand new to the Harmony team or have been here since the very beginning, you play an important role in our company and in the ongoing pursuit of our mission.

***What we do is important, but how we do it is just as important.***

Our Code of Conduct (Code) provides the guidance and direction required for us to achieve our goals and make sound business decisions while demonstrating the highest ethical standards and integrity in everything we do. Our Code summarizes many of the key policies, principles, and procedures that support the work we do every day. It also helps protect the interests of our stakeholders and empowers us to be our very best.

It is important that you take time to carefully review and familiarize yourself with the fundamental policies, principles, and procedures that are explained throughout this Code. As you read the Code, if you have questions or concerns or are uncertain of what to do, please consult your manager, Human Resources, or a member of the Compliance or Legal teams.

We greatly appreciate your commitment to always doing the right thing and to upholding our Compliance principles. Your dedication to the highest standards of professional conduct is critical to our success and the important work we do every day. Thank you for your continued commitment to Harmony, your colleagues, and the patients we serve.



**Jeffrey M. Dayno, MD**  
Chief Executive Officer



# WHO WE ARE

At Harmony, we want to infuse hope into the lives of our patients – hope in a future that will someday be free from the hardships of rare diseases. Harmony advocates on behalf of our patients every day, working diligently on new and innovative care options to improve their daily lives. By understanding their unmet needs and the challenges they face, our team prioritizes both empathy and innovation to develop and deliver new therapies.

We are dedicated to developing and delivering novel treatment options for people living with rare neurological diseases as well as those living with other neurological diseases who have unmet medical needs.

**We keep patients at the heart of everything we do.**



**Nearly 1 in 10 Americans currently live with a rare disease.<sup>1</sup>**



**More than 90% of rare diseases have no treatment.<sup>2</sup>**

<sup>1</sup> <https://rarediseases.org/get-involved/donate-now/give/35-years-growing/#:~:text=There%20are%2030%20million%20Americans,of%20patients%20with%20rare%20diseases.>

<sup>2</sup> <https://rarediseases.org/new-report-finds-medical-treatments-for-rare-diseases-account-for-only-11-of-us-drug-spending-nearly-80-of-orphan-products-treat-rare-diseases-exclusively/>



## We are poised for new discoveries and continued growth.

At Harmony, we are focused on developing and commercializing therapies that transform patient lives. We began our journey with eight employees when we were founded in 2017, and our success has transformed us into a public company that continues to grow and thrive.

With strong clinical development, regulatory, medical, and commercial capabilities, we are well positioned to acquire, develop, and successfully commercialize assets at different points in the development path.

Harmony continues to invest in expanding our pipeline through dedicated business development efforts. We hope our focus on patients and our strategic acquisitions will represent the next generation of targeted therapies for people living with a variety of neurological diseases.

At Harmony, our Code is centered around our values and is a guide to help ensure we conduct our business honestly and with integrity. Business can sometimes be complicated and challenging as our industry and our world continuously evolve.

Much has changed since our beginning in 2017. Such change requires us to be flexible and to have the right mindset – one that is nimble, agile, and focused – empowering us to be creative in our approach while conducting our activities in accordance with the laws, regulations, and industry codes that govern our business.

# HOW WE OPERATE

Our Code helps guide our decision-making, our actions, and our behaviors in the context of the work we do every day. It equips us with principles for doing business the right way and engaging in ethical interactions with each other, our business partners, the healthcare community, patients, and other stakeholders. Our Code helps ensure we are all in sync with not only what we do, but how we do it.

Together, we are better. We value the knowledge, talent, and insight from every individual at Harmony, and we know that our diversity is our greatest strength.

**This is  
Harmony.  
It's who  
we are.**



# CREATING OUR CODE

**TRICIA GLOVER**  
Chief Compliance Officer

When musicians play an instrument or sing in harmony, they create a powerful sound that extends well beyond the individual contribution from each person. It is the blending of notes from multiple voices or instruments which resonates and inspires the audience.

As an organization, it's important that we blend our individual goals, backgrounds, and talents to **pursue our mission and live out our values.** We all have a responsibility and expectations to contribute as individuals, but **it's our collective efforts that can create something extraordinary.** Just like an orchestra, we are better together – in concert – that's where true harmony is found.

Our name represents much more than just a corporate entity.

**Harmony is symbolic of who we are and how we operate – it's a call to action.**

The design of our Code has been inspired by all the things that are required to create harmony. The wood that is crafted to make a single instrument originated from a single seed that grew over time into a tree. Brass instruments are meticulously forged by combining copper and zinc into a molten material

that is solidified, twisted, formed, and refined into precise shapes that play the perfect sounds. As you read and reference our Code, I hope you are inspired by the meaning behind our name, that you consider it to be your call to action, and that you are proud to be **creating harmony together by doing extraordinary work every day.**

Our Code helps us to do our best work with integrity, honesty, trust, and creativity. Just like you, our Code is a very important part of our story here at Harmony.

## TOGETHER, WE...

Produce a powerful sound



Blend our voices



Are meticulously forged and constantly refined



Are better together



Create something extraordinary



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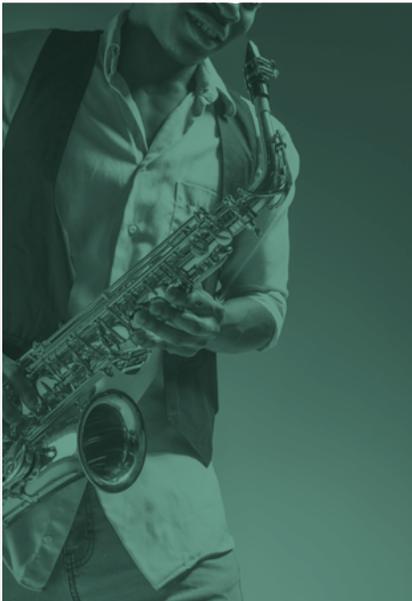
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Our success depends on our ability to work together and keep communication lines open.

Chapter 1:  
CREATING  
HARMONY

*Honesty, Creativity, and Trust*



# Chapter 1: CREATING HARMONY

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## Honesty, Creativity, and Trust

**When we adhere to our Code, we keep patients at the heart, and we support one another. Together, we help elevate our organization – morally, ethically, and legally.**

We specialize in developing and delivering treatments for rare neurological diseases that others often overlook. We appreciate the totality of the symptoms that burden people living with rare neurological diseases, creating a holistic approach to developing and bringing new therapies to the market.

# MISSION, VISION, AND VALUES

Our mission at Harmony is to bring hope for patients who are living with rare neurological conditions via the introduction of new, innovative medicines that address unmet medical needs and through the energy, commitment, expertise, and heart of our employees.

Our vision is to continuously evolve as an innovative, agile, and leading rare disease company in the neurology arena, positioned to develop and commercialize a robust portfolio of assets designed to improve the quality of life of patients living with rare diseases.

It's our values that represent our beliefs and what we stand for as a company. We bring these values to life through our behaviors and actions. Our values create harmony in our culture, in the decisions we make, and in our interactions with each other, our business partners, the healthcare community, patients, and other stakeholders. Our values are not conceptual; they are concrete, and they are the basis of our Code. They should always be top-of-mind as we review the principles that are outlined in our Code.



# APPLICATION AND EXPECTATIONS

Our Code applies to all Harmony employees and members of our board of directors.

Our Code defines how we interact with each other, our business partners, the healthcare community, patients, and other stakeholders. It also encourages honest and ethical conduct to ensure we always operate with the highest standards of professional and business integrity, while seeking to avoid even the appearance of improper behavior.

**We believe that acting with integrity means always being truthful, accountable, and doing the right thing...even when no one is watching.**

Harmony is subject to a wide array of laws, regulations, and industry codes that are designed to protect patients and the independence, integrity, and quality of clinical decision making. Complying with the law, both in the letter and in spirit, is the foundation on which Harmony's ethical standards are built.

This Code is not intended to cover every situation that may arise, but it is intended to lead us to other resources that can assist, including policies to review and departments to consult. Our Code is supplemented by additional policies that cover business practices in more detail or address certain local or regional issues.

Every employee is required to understand and comply with this Code, as well as the laws and policies that pertain to their job.

If you have questions about which laws, regulations, policies, or industry standards apply to your work, consult with your manager or contact a member of Compliance, Human Resources, or Legal.

With great opportunities come great responsibility, including the expectation that we always operate with the highest integrity.

## Waivers

Any waiver of our Code for an employee or an immediate family member of an employee, requires written approval from the Chief Compliance Officer. Furthermore, before a director or executive officer, or a member of their immediate family, engages in any activity prohibited by the Code, he or she must obtain a written waiver from the disinterested members of the Board. Harmony will disclose such waiver to the Company's shareholders along with the reasons for granting the waiver, as required by SEC and Nasdaq rules.

## Code Enhancement Disclosure

On February 15, 2023, Harmony Biosciences, Inc. ("Harmony") made the following enhancements to the Code of Conduct: Aligned Code to Harmony's mission, vision, and values; Summarized and organized key policies and procedures by the key pillars of Harmony's business; Expanded on Harmony's Environmental, Social Values, and Governance (ESG) focus areas; Increased awareness, engagement, and accountability around what Harmony does and how it conducts its business.

# SPEAKING UP

At Harmony we are committed to conducting business with honesty and integrity in accordance with our company values, our Code, applicable laws and regulations, company policies and procedures, industry codes and other applicable standards relevant to Harmony's business practices.

Our Code helps guide our actions, but it cannot anticipate every situation. Even though the musical composition on a page is intended to create harmony, we know things sometimes do not go according to plan, and when that happens, we encourage you to speak up, ask questions, and share your concerns.

Harmony always encourages open lines of communication, and encourages employees and non-employees to speak up, ask questions, and seek guidance whenever you have a question or concern and/or if misconduct is observed. Additionally, employees are required to make Harmony aware of any misconduct that could be harmful to the company, our employees, and our stakeholders.

In many situations, you may feel most confident asking your manager, but you can also receive guidance through other channels. If you have questions or believe you have observed or experienced any actions or behaviors that violate our Code or any other company policies, you can safely bring your concerns to the attention of any of the following:

- Direct or Indirect Line Management
- Senior Executives
- Human Resources
- Compliance
- Legal
- The EthicsPoint® Reporting System

The graphic features the words "SPEAK" and "UP" in a bold, sans-serif font. "SPEAK" is in dark blue, and "UP" is in a teal color. The letters are surrounded by a series of vertical bars of varying heights, resembling a musical staff or a soundwave, in shades of blue and green. The bars are arranged in a way that suggests a rhythmic pattern, with some bars being taller than others, creating a sense of movement and sound.

**SPEAK** UP

## HOW DO I SPEAK UP?

In addition to all of the other options noted on the prior page, Harmony has a third-party phone and internet-based reporting system, which is managed through **NAVEX EthicsPoint® system**. You can **make an anonymous report** at any time through the EthicsPoint® website at [www.harmony.ethicspoint.com](http://www.harmony.ethicspoint.com), or by calling **844-696-3453**.

*Ask Questions.*

*Report Concerns.*

*Get Answers.*

Harmony provides a safe environment for anyone who wishes to raise a concern about misconduct and will not tolerate retaliation against anyone who has made a report or complaint in good faith or who has cooperated in the investigation of such a report or complaint. The company treats reports confidentially to every extent possible and consistent with reasonable investigation and appropriate action.

## ACCOUNTABILITY

You play an important role in helping us meet the standards reflected in our Code by setting the right example through your words, actions, and behaviors. Our conduct should always be in harmony with our values and our Code. We are all accountable to doing the right thing...every day.

**We believe in transparency, collaboration, and respect in our interactions with one another.**

Raising a concern, reporting possible misconduct, or simply speaking up when something doesn't feel right, all require courage. We have empathy for the uncertainty or discomfort people may feel when reporting something or when cooperating with an investigation.

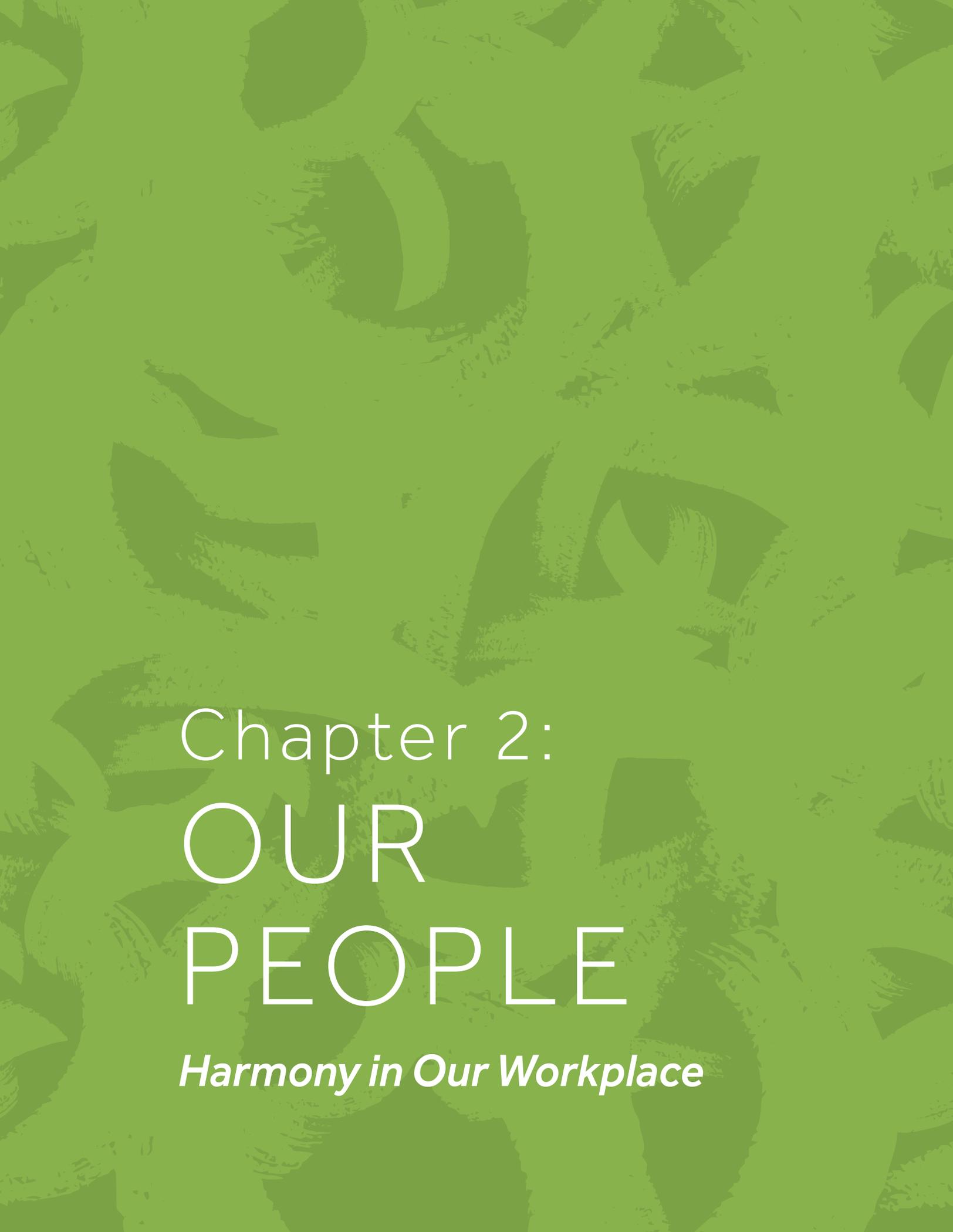
**We investigate all reported instances of questionable or unethical behavior.**

Raising concerns or reporting violations of our Code or other company policies is always expected and helps to uphold our values and preserve our reputation.

All reports, regardless of the outcome, are valued when they are made in good faith. Retaliation against anyone who has made such reports will be considered a significant violation of our company values and this Code. Improper retaliatory attempts, or threats, will lead to disciplinary actions up to and including termination.



Together we have built an organization that prioritizes safety, quality operations, and freedom in our workplace.



Chapter 2:  
OUR  
PEOPLE

*Harmony in Our Workplace*



# Chapter 2: OUR PEOPLE

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## Harmony in Our Workplace

**Members of our teams, and all people we interact with inside and outside of our organization, deserve to be treated with dignity, respect, and inclusivity.**

The honesty, creativity and trust we bring as individuals is evident throughout our organization as we work together. At Harmony, we have built a culture that prioritizes safety, quality, and freedom in the workplace in multiple ways:

- **Physical safety** in the workplace
- **Quality** in our operating practices
- **Environmental safety**, where we work in a healthy, non-toxic environment and make decisions that promote a healthy environment for all
- **Freedom from harassment** of any kind
- **Mental and emotional safety** in our interactions, our hiring, and the pursuit of our mission

Our core values describe a culture of safety and quality, and our work should be done in the best and safest way possible.

# SAFETY

**Safety matters.** At Harmony, we maintain a workplace with rigorous safety standards intended to prevent accidents and ensure the ongoing health and wellbeing of our teams and visitors.

We are conscientious about workplace safety, unsafe conditions, and potential hazards. We meet or exceed the standards set by the health and safety laws which apply to our organization. Where our policy documents spell out our procedures and rules in detail, we carefully implement these guidelines. If accidents, illnesses, or close-call situations happen, we report them in detail to our managers or through other appropriate channels, such as Human Resources.

Violence, threats or physical intimidation of any kind, or any activity that advocates or is designed to incite violence will not be tolerated within the Harmony workforce.

# QUALITY

**Quality matters.** Quality, safety, and good operating practices are crucial components we rely on to deliver on Harmony's mission. They apply to *everything we do – every day*.

With our products, quality is the highest priority. Delivering quality solutions to our patients is at the core of our work, our purpose, and our value. This applies not only to the physical product as manufactured, but also to the development, production, and delivery of those products.

**Delivering quality solutions to our patients is at the core of our work, our purpose, and our values.**

**We strictly prohibit the possession or use of weapons, even if licensed, on our premises (other than by law enforcement or security personnel).**

We show respect for ourselves and our community by refraining from using, possessing, or selling any illegal substance at work or at home. As part of our commitment to safety, we keep our workplace free of illegal drugs.

**We incorporate good operating practices by implementing:**

- Good Documentation Practices (GDP)
- Good Clinical Practices (GCP)
- Good Laboratory Practices (GLP)
- Good Manufacturing Practices (GMP)
- Good Pharmacovigilance Practices (GVP)
- Good Distribution Practices (GDP)

# FAIR EMPLOYMENT

At Harmony, we believe diversity, equity, and inclusion are in the DNA of our company. They are more than just goals – they are essential to who we are, how we operate, and what we achieve together.

**At Harmony, we celebrate our differences. We value diversity, equity, and inclusion.**

We believe a diverse set of people, skills, values, and perspectives are essential to delivering on our mission and our values. Our focus on diversity includes, but is not limited to the following: race, gender, ethnicity, national origin, cultural background, gender identity, sexual orientation, age, religion, language, ability, disability, and cognitive diversity.

**We do not discriminate.**

Harmony is an Equal Employment Opportunity employer. Unlawful discriminatory behavior of any kind is prohibited. All qualified potential or current employees will receive equal consideration for employment opportunities without regard to race, color, national origin, religion, sex, pregnancy, marital status, sexual orientation, gender identity/expression, age, disability, genetic information, military service, covered/protected veteran status or any other federal, state or local protected class.

We provide equal opportunity for all persons and expect that every employee and business partner of Harmony will commit to working together to accomplish our vision for a better future.

## EMPLOYEE HANDBOOK

Harmony's Employee Handbook contains policies and procedures relevant to all employees. All Harmony employees must be familiar with the standards that apply to their business and their role.

# FREEDOM IN THE WORKPLACE

Our people make us the company that we are. We believe everyone is born with dignity and rights and deserves to live a life free from discrimination. Our team members are expected to treat all people with dignity, respect, and inclusivity in every internal and external interaction. We strive to create a corporate environment where each person feels uninhibited freedom to show up as their best, most true, self.

**We believe that we are successful in our mission when we foster an environment of safety, creativity, and freedom of expression.**

**Harassment, bullying, or improper conduct of any kind is never tolerated at Harmony.**

We define harassment as any verbal or physical conduct designed to threaten, intimidate, or coerce an employee, co-worker, or any person working for or on behalf of Harmony.

Both bullying and harassment may involve behavior, verbal comments, and/or physical contact that psychologically or emotionally hurt, isolate, or demean a person in the workplace. This includes repeated incidents or patterns of behavior that are intended to intimidate, offend, degrade, or humiliate a particular person or group. This type of behavior is the antithesis of who we are and who we want to be.

Anything that creates a hostile, unwelcome, or intimidating workplace atmosphere is

unacceptable. All employees are expected to take harassment in any form seriously and report any incident they have been informed of, witness, or experience.

## LEADING THE WAY

**Managers are expected to lead the way in diversity, equity, and inclusion and embrace Harmony's policies on Fair Employment and Freedom in the Workplace.** Harmony managers are required to contact Human Resources if they are aware of a complaint or potential conduct that violates Harmony's Harassment-Free Workplace Policy, even if it is outside the scope of their immediate department. Managers who knowingly allow or tolerate discrimination, harassment, or retaliation, including the failure to immediately report such misconduct to Human Resources, are in violation of our policy and subject to discipline.

## Behaviors that may constitute harassment include:

- Intimidating, demeaning, or offensive remarks
- Racial or religious slurs or epithets
- Sexually suggestive or derogatory language, humor, innuendos, or imagery
- Unwanted physical contact

### Harassment may be in the form of:

- Verbal and non-verbal communication
- Photos
- Printed or displayed materials
- Jokes
- Emails, text messages, or other workplace documents

We value freedom of speech and association. Bullying and harassment never fall under these protections. Appropriate disciplinary action will be taken against any employee who violates this policy. Disciplinary action may include verbal or written reprimand, suspension, or termination of employment.

We believe that many minds working creatively together is far stronger and can accomplish more than one mind working alone. This does not mean we should all hold the same opinions, frame our thoughts in the same way, or agree on all topics.

It is impossible to value diversity and inclusion without also valuing freedom of speech. We are careful, however, to express our opinions appropriately in a workplace environment, and in ways that don't feel intrusive or intimidating to others.

## FEEDBACK AND COLLABORATION

We are a collaborative community that thrives on feedback and believes we can achieve great things together.

**Feedback** should always be goal-oriented and business-focused. It should be delivered in a constructive and unemotional manner, providing practical insight and action steps to help improve execution of the task at hand.

**Collaboration** isn't simply an activity. Collaboration is a mindset and it's an essential part of our culture. At Harmony, we believe we are more capable, smarter, and more creative when we work together as a community.

**When undue influence becomes evident, we use offline conversations directly with the individual or individuals involved to provide feedback and address the issue. If the issue persists, we address it with our manager.**

- We value listening and empathy
- We focus on team goals
- We leverage our diversity
- We watch out for "groupthink" and encourage everyone to adopt a teamwork mindset
- We reward innovation
- We learn from failure and we celebrate success
- We share knowledge and make communication a priority

At Harmony, we are passionate about integrity because we know integrity drives our values.



Chapter 3:  
OUR  
COMPANY

*Harmony In Our Business*



# Chapter 3: OUR COMPANY

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## Harmony In Our Business

**Integrity has two meanings – the quality of being honest and true to moral principles, and the state of being complete and undivided.**

Both meanings apply to Harmony's business integrity and our Code. It means we are asking you to be accountable – and for you to hold others accountable – to the way we do business.

There are many rules and regulations designed to protect our company, our people, our customers, and the patients we serve. Healthcare laws and regulatory requirements are in place to improve the quality of medicines and healthcare services and help eliminate fraud and improper influence on medical judgment.

Harmony is committed to following the letter and spirit of the law and the regulatory requirements that govern our business activities. In the event local laws or federal regulatory requirements differ from Harmony's policies, the stricter requirements will generally apply.

# DRUG SAFETY AND QUALITY

At Harmony, we have set the bar high. Quality means following high standards as we research new patient solutions, ensuring our products are manufactured reliably and their effects on patients are monitored appropriately. Patient health and safety is our top priority and we are committed to providing high quality products that are safe and effective. We are also committed to reporting any safety or quality issues concerning a Harmony product no matter how we became aware of the issue.

**When our patients trust us, they also trust the pharmaceutical solutions we provide for them.**

## Adverse Events

We have an obligation to report any medical occurrence associated with the use of a Harmony product that we are made aware of regardless of the nature of the event, severity, whether or not it may be related to a Harmony product, or if a patient is on other medications.

Adverse events must be reported to Harmony's Medical Information team within one business day of learning of the event. We take adverse event reporting seriously, and ensure all adverse events are properly investigated by our Pharmacovigilance team, and reported to the appropriate authorities as required.

## Product Complaints

We also have a duty to report any issue or concern over the quality of our products to Harmony's Medical Information team within one business day of learning of the product complaint. We take quality-related complaints seriously, and ensure that they are properly investigated by our Quality team, and reported to the appropriate regulatory authorities, as required.

# CONFLICTS OF INTEREST

**Conflicts of interest occur when the private interests of those within Harmony interfere, or appear to interfere, with the interests of Harmony as a whole.** Conflicts can be direct or indirect, for example if an employee is a major shareholder or business partner in a company or organization doing business with Harmony.

We have an obligation to conduct company business in an honest and ethical manner, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.

A conflict of interest can arise when someone from our organization, or a member of their immediate family, received improper personal benefits as a result of their position at the company.

**Any situation that involves or could potentially involve a conflict of interest, should be disclosed promptly to Legal or Compliance.**

Our Code does not attempt to describe all possible conflicts of interest that could develop. Other common conflicts from which employees and business partners must refrain include, but are not limited to the following:

- Employees and business partners may not engage in any conduct or activities that are inconsistent with Harmony's best interests or that disrupt or impair Harmony's relationship with any person or entity with which Harmony has or proposes to enter into a business or contractual relationship
- Employees and business partners may not accept compensation, in any form, for services performed for Harmony from any source other than the company
- Employees and business partners may not take up any management or other employment position with, or have any material interest in, any firm or company that is in direct or indirect competition with Harmony



## FAIR COMPETITION

All employees and business partners should endeavor to deal fairly with Harmony's customers, service providers, suppliers, and competitors. We do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.

Inappropriate use of proprietary information, misusing trade secret information that was obtained without the owner's consent or inducing such disclosures by past or present employees of other companies is also prohibited.

We believe we can, and will, continue to grow Harmony on the merits of our products and services. This means we do not talk about subjects that might be misperceived or lead to even the appearance of seizing an unfair advantage or collusion with other pharmaceutical companies.

Trust is a significant part of our business and gives us a competitive advantage.

Fair dealings also extend to the marketing and advertising of our products. We are always truthful and honest when making statements about our products.

We are mindful that antitrust laws vary by state, therefore we partner with our Legal team to ensure we understand the laws and regulations which apply to each situation.

# ANTI-CORRUPTION

As a pharmaceutical company deeply involved in meeting the health needs of patients, Harmony must rise above any suspicion of bribery, undue influence, or corruption. We comply with applicable laws and regulations to be above reproach in how we do business, reach high standards of transparency, and create a culture of financial integrity.

We monitor and are alert to any signs which might indicate money laundering, and we follow company protocols to reduce our risk of exposure to such activities. We always report any suspicions directly to Legal.

**We are principled and ethical  
in all the ways we do business.**

# TRADE CONTROLS

We adhere to the licensing requirements, trade regulations, and other import and export laws as established by national and international authorities.

We value what is “transparent” and “above board” over what is merely expedient.

This applies to any business or transactions in which we may or may not choose to actively pursue or engage.

The promise, offer, or delivery of anything with the intent to influence any government official or an employee of the government would be considered a violation of our policy and could also be a criminal offense.

We also prohibit giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates for business gain. United States laws prevent companies like ours from participating in international boycotts not sanctioned by our government.

# INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Intellectual property broadly refers to our know-how and legally protected assets, including our patents, copyrights, trademarks, trade secrets, and other proprietary information.

We must safeguard this intellectual property as well as our confidential information (for example, our customer lists, operations manuals, and contracts) by keeping it secure, limiting access to those who have a need to know in order to do their job, and avoiding discussions in public areas where it could be overheard or seen.

## Respecting the Intellectual Property of Others

When data or intellectual property is provided to us, our stakeholders, business partners, other companies, individuals, and entities need to know they can trust and depend on Harmony to respect and protect their information.

Through our broad networks, key relationships, and business partnerships, we sometimes receive sensitive, personal, or proprietary information. We must always take care to ensure our proprietary information remains private, and we must do the same for those who share information with us.

**Because we are trustworthy,  
others can depend on us.**

**We never use others' proprietary material without permission.**

## Competitive Intelligence

Competitive intelligence is information about our competitors or other institutions in the healthcare field which is not publicly disclosed and might confer an advantage to us. This could be intellectual property, raw data, or any other kind of legally protected information.

We do not use information we should not have access to or have not been given the right to use. If unsolicited information is received about a competitor, you should contact the Legal department immediately.

The only time we use information from other companies is when it has been appropriately and deliberately disclosed to us or is publicly available. If you are speaking with a person who currently works or previously worked for another company, do not engage in conversations that might lead to you hearing confidential information. Just because you acquire information without asking for it, does not permit you from accepting or using inappropriate disclosures.

Fulfilling our mission requires safeguarding the information we have, regardless of source.

## Privacy

We support and respect privacy – both internally and externally.

**Our support of internal privacy means everyone on our team can trust that their personal information will not be shared inappropriately.**

Our support of external privacy means we strive to never compromise personal information about our business partners, patients, healthcare professionals, and other stakeholders.

## Use of Company Assets and Systems

We work together to preserve our company assets – from our devices and spaces to our machinery and networks.

The hardware and systems we use for work are the property of Harmony. Our internet use and the files we store on company-owned devices may be monitored from time to time.

We transport our portable devices safely and never leave them publicly unattended. We are careful not to reveal company information if we must use our devices in a public setting.

We limit the use of our networks and systems for personal reasons.

## OUR COMMITMENT TO PRIVACY

**At Harmony, we are committed to:**

- Protecting the confidentiality of personal information entrusted to us
- Collecting, using, and retaining personal information only to the extent we need it for legitimate business, human resources, or scientific purposes, or as otherwise required or permitted by applicable law
- Complying with applicable privacy laws, including any requirement to inform or obtain consent from individuals regarding collecting, processing, accessing, and disclosing their personal information
- Never sharing personal information inappropriately or without consent, unless legally required to do so
- Keeping personal information secure in the workplace and online
- Reporting any suspected or actual breach of privacy to the Legal team or through other reporting channels:  
**[www.harmony.ethicspoint.com](http://www.harmony.ethicspoint.com)**

# INSIDER TRADING

Preventing insider trading ensures Harmony is in compliance with the law and preserves the reputation and integrity of Harmony. In today's world, information is a commodity which can be used to confer advantage.

**Insider trading occurs when any person purchases or sells a security while being aware of material non-public information relating to the security.**

Non-public information we have at Harmony is confidential, and we never distribute non-public information deliberately or casually.

We never use or provide to others "insider" or non-public information which might influence investment decisions. This 'material information' could affect the judgment of investors in the buy, sell, or hold decisions. The use of this information for financial benefit of yourself and others is not only unethical, but also illegal.

Our company's value of integrity and ethics means we do not merely meet the letter of the law, we exceed it whenever possible. We do not just behave appropriately; we avoid even the appearance of insider trading.



# FINANCIAL INTEGRITY

## Accurate Records

Maintaining accurate business records demonstrates our commitment to conducting business with integrity and protecting investor confidence and Harmony's reputation. We are committed to providing accurate, full, timely, and reliable information to regulatory authorities and the public. Our internal controls are designed to provide reasonable assurance that our financial statements are prepared in accordance with generally accepted accounting principles and accurately reflect the company's financial condition.

We believe financial integrity is more than just complying with law – it helps define who we are and shows that honesty and transparency are central to Harmony's culture.

### Maintaining accurate records requires that all employees:

- Ensure the description of any payment made on Harmony's behalf accurately reflects the purpose described in the supporting documentation
- Never intentionally hide or disguise the nature of a financial transaction
- Ensure our financial records accurately portray Harmony's revenue, assets, expenses, and liabilities
- Keep meticulous and reliable financial records, and complete them in a timely manner
- Record all financial and business transactions in the proper account and during the proper accounting period

- Immediately report any inaccuracies or concerns regarding financial transactions to Finance
- Cooperate with internal and external auditors

## Business Records / Records Management

We achieve harmony as an organization when our records are accurate, transparent, and complete.

The proper use of records is important to our work at Harmony: it facilitates decision-making, supports our legal, financial, regulatory and contractual obligations, and promotes organizational efficiency. Furthermore, many business records that we create or receive at work are valuable company assets, regardless of format (e.g. paper, electronic, audio/video). Efficient and accurate records management is vital for the protection of Harmony's business interests. In addition, some government agencies regulate the retention and disposition of documents. Failure to comply with Harmony policies, government regulations or court orders can lead to serious consequences.

All of us are caretakers of our records. We know that good decisions depend on good information from all levels of the organization. When something is missing or when a particular transaction or document raises suspicion, we must report our concerns to our manager, or Compliance, Finance, or Legal, or through our phone or internet-based reporting system at [844.696.3453](tel:844.696.3453) or [www.harmony.ethicspoint.com](http://www.harmony.ethicspoint.com).

## Cybersecurity

Maintaining accurate records extends beyond paper and spreadsheets. We follow best practices to ensure the cybersecurity of our documents and data that is stored on our networks, in the cloud, or on any platform with virtual access.

We follow the procedures outlined for us by our IT team. We stay up to date on internal communications that warn us of potential threats, and we never store information outside of approved, company-maintained locations.

We utilize separate accounts for our work and personal communications.

If we receive suspicious emails that were sent to our work email, we are diligent not to open them, and we share them with the appropriate departments for investigation.

## Artificial Intelligence

Artificial Intelligence (AI) allows computers to “think” and “learn” as if they had human brains. This is an emerging technology of growing importance to the pharmaceutical industry with implications for drug development, analysis of patient and clinical data, and much, much more.

At Harmony, we hold our machines to the same standards we uphold ourselves. When we employ AI, or its sub-field machine learning, we commit to meeting all the relevant principles for safety, privacy, and accountability throughout this Code.

# CLINICAL INTEGRITY

## Research and Development

Our commitment to patients, customers, and stockholders begins with careful observation of safety procedures and research protocols in clinical trials.

We are transparent with our patients about the nature and purpose of clinical trials. We keep patients safe by not exposing them to unnecessary risk during a trial, by keeping their personal information private, and by obtaining all needed approvals before the trial begins.

The team members who conduct our research and clinical trials are qualified, trained, and professional. We document and report our research and clinical trials accurately and meticulously.

### **We are a team dedicated to novel innovations.**

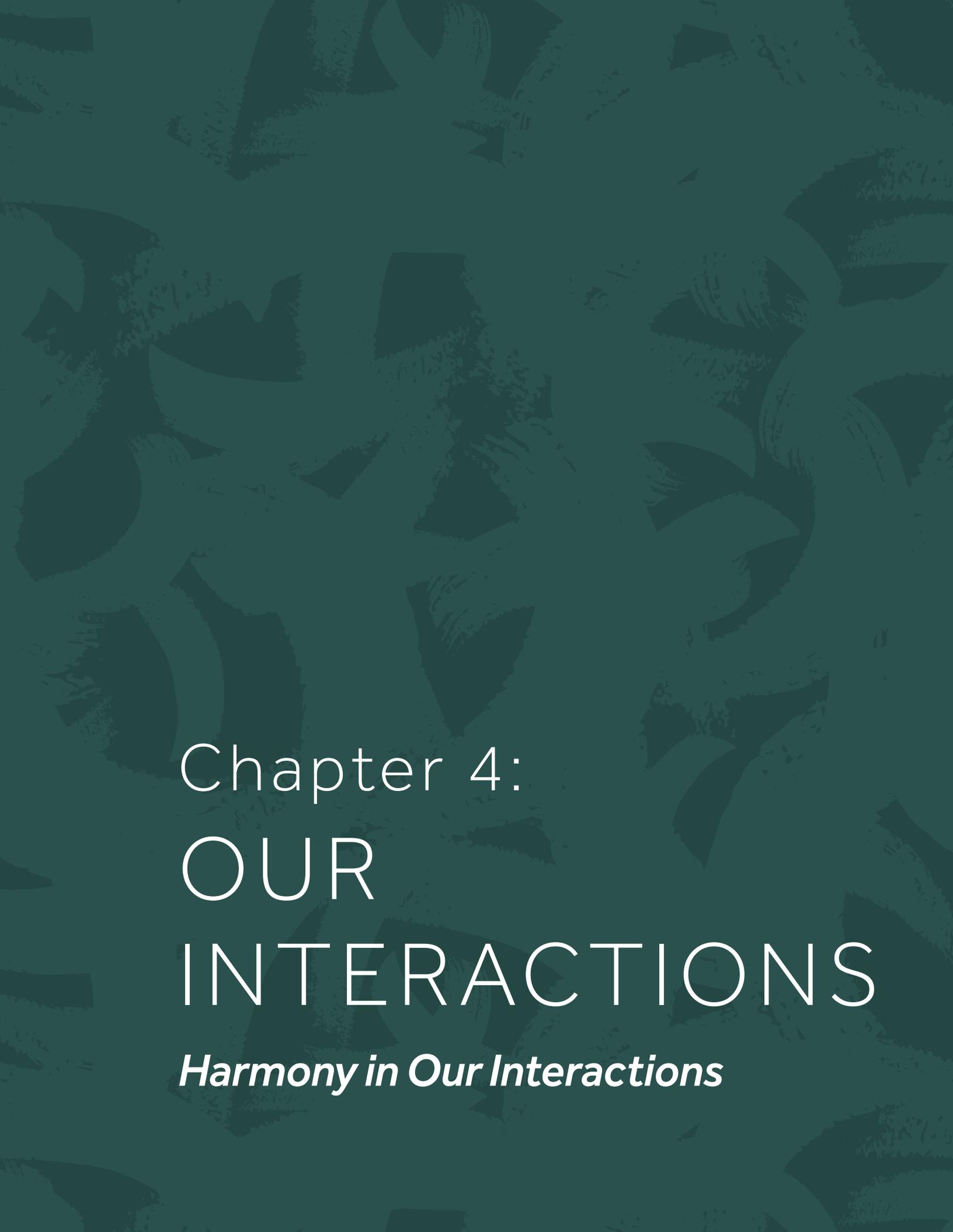
We have built an innovative team and team structure that is aligned to our mission, allowing us to understand patient insights, translate clinical research, discover potentially groundbreaking results, and move treatments through the approval process and successfully bring them to market.

Patient needs drive our team's drug development efforts to create value for all our stakeholders. We are non hierarchical, collaborative, staffed with strategic thinkers, and driven by life science innovation – all of which promote teamwork, scientific discourse, development of novel treatment options in rare neurological diseases, and seamless commercial execution.

We are **led by exceptionally qualified individuals** across the organization who have decades of experience and expertise **working with rare neurological disease patient populations**. This expertise spans the realms of clinical development, regulatory affairs, and commercial, as well as excellence in the areas of legal, finance, patient advocacy, business development and more. **Our teams are at the top of our fields**, representing a diverse group with a wide range of skill sets and areas of expertise.



We always engage the healthcare community in ways that are consistent with all of our values.



Chapter 4:  
OUR  
INTERACTIONS

*Harmony in Our Interactions*



# Chapter 4: OUR INTERACTIONS

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## Harmony in Our Interactions

**This section of our Code addresses how we interact with people and organizations outside of Harmony.**

We follow all appropriate laws, rules, and regulations relating to our communications and transactions with the healthcare community. When working with people outside our organization, we strive to achieve our business objectives while doing business the right way and engaging in ethical interactions with healthcare professionals, patients and patient organizations, business partners, and other stakeholders.

# HEALTHCARE PROFESSIONALS

We must engage in interactions with healthcare professionals (HCPs) in accordance with applicable laws, rules, industry standards, Harmony policies, and our values. We are committed to the highest ethical standards and we act with integrity and transparency when we interact with the medical community. Our interactions are focused on educating and providing HCPs with relevant treatment options that are aligned to the needs of their patients.

## **Our Commitments and Standards for Ethical HCP Interactions include, but are not limited to:**

- Informing HCPs, in evidence-based medical and scientific terms, about the known risks and benefits of our products so they can make informed medical decisions and determine the best treatment options based on their patient's unique medical history
- Avoiding interfering with an HCP's independent decisions regarding patient care – this includes the prescribing of our products or unethical attempts to persuade an HCP to prescribe our products over others
- Sharing information about our products that is current, accurate, fair balanced, and not misleading
- Educating HCPs on the appropriate use of our products in accordance with approved product labeling – we must not make unsubstantiated claims
- Referring healthcare professionals with off-label questions to our Medical Affairs team rather than engaging in what could appear to be off-label promotion
- Ensuring that our promotional communications and materials are reliable, truthful, not misleading, relevant, and in line with regulatory approved uses
- Ensuring compliance with local laws, including applicable standards addressing substantiation, scientific rigor, and fair balance
- Engaging in research with the healthcare community only when that research has a legitimate scientific purpose and meets our standards for scientific rigor
- Validating there is a legitimate business need before entering into any engagement with an HCP and paying fair market value for the services rendered

## Scientific Exchange

Scientific exchange is not about marketing or the promotion of our products. Scientific exchange is engaging in accurate, timely, and relevant communication with HCPs about research results and scientific information.

Scientific exchange is usually done in the setting of medical meetings. These conversations never include members of our sales team, and there

is no promotional consideration or intent. It is also done reactively in response to an off-label question, which is submitted through Medical Affairs and Harmony's Medical Information Request process.

We are careful not to mislead the healthcare professional or exclude data which might create a false impression of the safety and effectiveness of our products.

# PATIENTS AND PATIENT ORGANIZATIONS

We consider **Patient Organizations** to be independent and not-for-profit entities that represent the needs of people living with medical conditions, their families, or other caregivers.

**We keep patients at the heart of everything we do.** This is one of our core values and the focus of our mission at Harmony. We believe HCPs are in the best position to discuss the risks and benefits of our products with their patients and determine the best treatment options for them. We also believe when patients are aware of their treatment options they are more engaged with their HCP and can take a more active role in their treatment plan.

Our interactions with patients and Patient Organizations are done so respectfully and consistent with applicable laws, regulations, industry standards and codes, ethical considerations, and our values.

**We stand with people living with rare diseases and the communities that support them.**

We are fulfilling our mission by leveraging a patient-centric model that allows us to listen to these communities and envision clinical development programs that focus on their unaddressed needs.

In addition to Patient Organizations, our teams engage with patient advocacy groups, working to provide support for patients living with rare neurological diseases and their families and caregivers.

# BUSINESS PARTNERS

Partnering with organizations and individuals outside of Harmony is a vital component in fulfilling our mission. While we enter such relationships with an eye for how they might be beneficial to our organization, we also endeavor to ensure that our partners share

our commitment to integrity, ethical behavior, environmental responsibility, and diversity.

When our partners disclose information to us, we keep it private and safeguard their information.

# GOVERNMENT

Healthcare is an industry closely regulated by government agencies – and for good reason. They work hard to safeguard patient care by ensuring our industry’s business activities are conducted in an ethical manner and in accordance with the laws, rules and regulations.

Harmony prohibits directly or indirectly offering, authorizing, or giving money or any other thing of value to any government official, political party, party official, or candidate for political office with the intent to:

- Influence any act or decision of a government official;
- Induce any government official to act in violation of a lawful duty;
- Secure an improper business advantage; or
- Obtain or retain business for, or direct business to, Harmony or any other person or entity.



# GIFTS, MEALS, AND ENTERTAINMENT

The purpose of business gifts, meals, and entertainment in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers. Harmony employees must act in a fair and impartial manner in all business dealings.

Gifts, meals, and entertainment should further the business interests of the company and not be construed as potentially influencing business judgment or creating an obligation.

Any gifts must comply with applicable laws and company policies. Gifts must not be lavish or in excess of the generally accepted business practices, nor may gifts ever be used to improperly influence, or give the appearance of improperly influencing, any business decision. Gifts of cash or cash equivalents are never permitted. Requesting or soliciting personal gifts, favors, entertainment, or services is unacceptable.

Harmony employees should always contact Compliance or Legal to discuss if they are not certain that a gift is appropriate.

The Foreign Corrupt Practices Act (FCPA) prohibits giving anything of value, directly or indirectly, to officials and families of foreign governments or foreign political candidates in order to obtain or retain business.

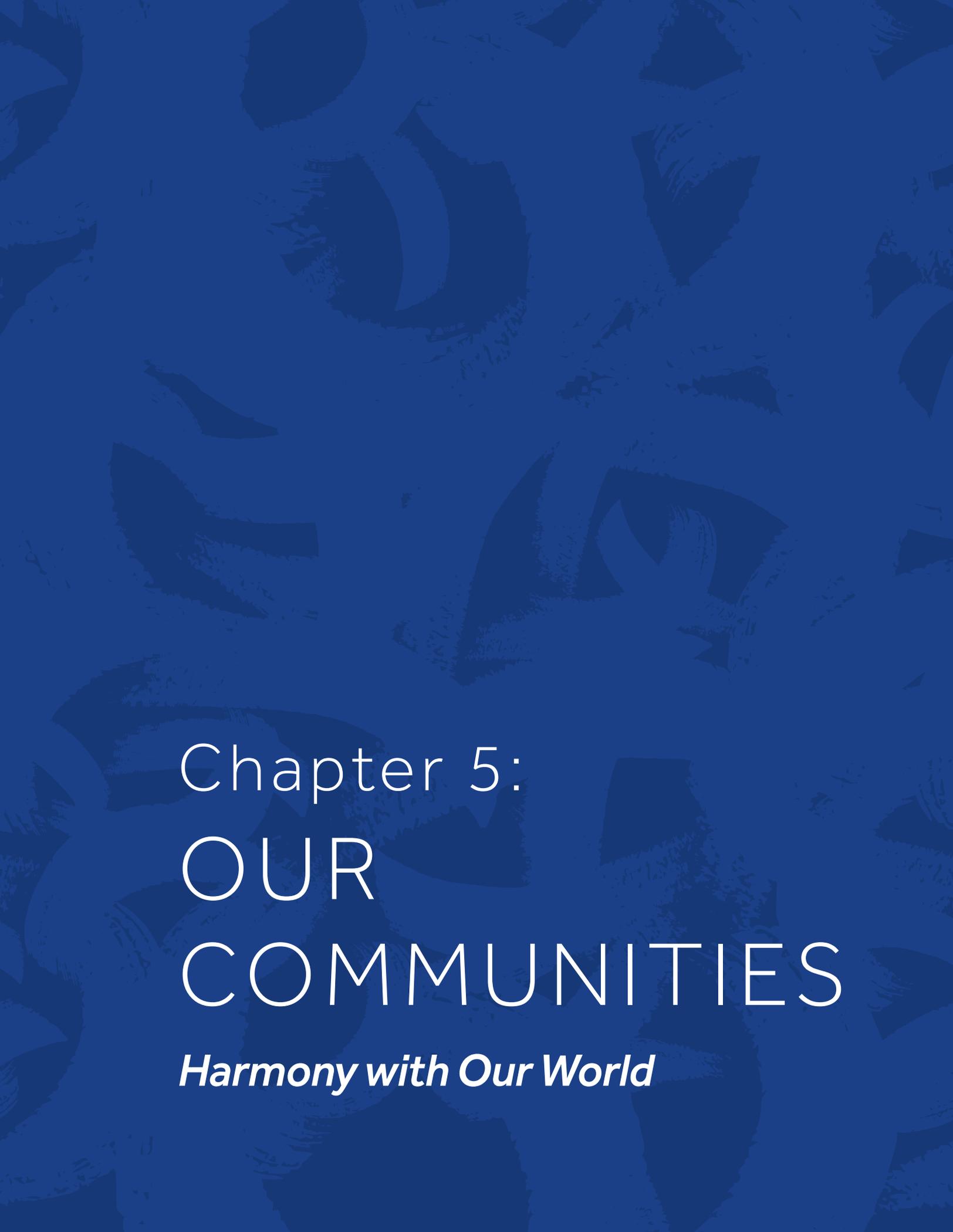
In addition, the promise, offer or delivery to a US official or government employee of a gift, favor or other gratuity in violation of these rules would not only violate Company policy, but could also be a criminal offense.

## FEDERAL ANTI-KICKBACK STATUTE

In the United States, the **Federal Anti-Kickback Statute** prohibits offering anything of value in order to influence an individual's decision to recommend, prescribe, endorse or purchase a healthcare product or service that is reimbursed by a federal healthcare program. This is to ensure that a healthcare provider's treatment recommendation is not influenced by motives of personal gain or enrichment. Equivalent laws exist in many U.S. states and in many countries around the world.



As an organization,  
we support worthy  
causes and strive  
to contribute in  
meaningful ways.



Chapter 5:  
OUR  
COMMUNITIES

*Harmony with Our World*



# Chapter 5: OUR COMMUNITIES

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## Harmony with Our World

The close of a great concert is often marked by an encore performance. This is a gesture of appreciation by the musicians to their audience. Harmony gives back, in a similar way, out of appreciation and respect for our stakeholders and our communities.



## GIVING BACK

As an organization, we support worthy causes and strive to contribute in meaningful ways. Harmony may provide matching gifts or support volunteer programs to pre-approved, non-governmental organizations.

While we will never require our team members to volunteer or contribute, we do encourage our people to support our community in the causes they find most worthwhile.

**Giving back includes fulfilling our mission to develop and provide new medications to help people who are living with rare diseases.**

# COMMUNICATIONS

We are proud of the work we are doing at Harmony. We are committed to providing clear, consistent, and accurate information to the general public, our investors, the healthcare community, and the media.

To this end, our **Corporate Affairs Team** is responsible for ensuring our communications reach the appropriate communities on behalf of Harmony. They also monitor the nature, tone, voice, and accuracy of our communications to people and organizations outside of Harmony. We should always gain permission from management and Corporate Affairs before making any statements or communicating with the general public or media.

## Communications with the Public

At Harmony, we share our successes, our growth, and other news through trade, scientific, and news media.

From time to time, you may identify news or events that would be of interest to the media. Share your idea with the Corporate Affairs Team to ensure the appropriateness and content before sharing with the media.

## Social Media

As an organization and as individuals, we live in a world abounding with social media.

Social media is technology-based communication in virtual networks and communities and generally features user-generated content and personalized profiles. Some of us participate daily, while others have no social media accounts at all.

Harmony uses social media for business purposes. Our many team members use social media for personal purposes. All of us diligently work to keep the two separate.

Unfortunately, while social media has connected people in new ways and generated valuable conversation, it has also generated controversy. For some individuals, participation has generated negative consequences. We recommend discretion in anything posted online.

### Our expectations regarding social media include:

- We are open about working for Harmony, but are careful to never represent the company in anything we say or post
- We never disclose non-public information of any kind about Harmony or our stakeholders
- We only post content that is consistent with our culture and core values

## Political Activities and Contributions

As individuals, we may choose to vote and participate politically. Within our organization, we keep our political opinions separate from our work communications and activities.

- We believe in the democratic process and voting
- We follow the local laws and regulation of the political process
- We support individual political participation and contributions
- We believe a safe and diverse workplace requires tolerance of competing political beliefs

Harmony, as a company, may participate in lobbying, negotiations, contributions, or other political activities as approved by the Board of Directors.

We identify our personal political views as our own and are careful not to speak on behalf of Harmony.



# THE ENVIRONMENT

## REDUCE, REUSE, RECYCLE

As an organization, we are committed to the three R's: Reduce, Reuse, and Recycle. The order of the three is important.

When we **reduce** our consumption, we limit or stop the use of that resource. For example, storing records electronically is a good way to reduce paper consumption.

When we **reuse**, we decrease the demand for single-use products with diminishing value. Using washable mugs instead of paper cups is a great example of reusing.

When we **recycle**, we restore value to something by turning it back into a useful raw material. For example, we recycle batteries or toner cartridges instead of throwing them away.

**Protecting our environment requires a commitment from each of us.**

We are committed to minimizing our impact on the environment. Climate change threatens to negatively impact the environment throughout our planet. We are living in a time of temperature extremes, unprecedented storms, and ferocious wildfires.

## At Harmony, we steward our resources with care.

Research, communication, and the manufacturing of products consumes energy and produces waste. We are committed to meeting and exceeding local laws and regulations by promoting the safe and responsible use of global resources. We expect our suppliers to hold themselves to similar standards.

# HARMONY RESOURCES

## KEY CONTACTS

### Corporate Headquarters

Harmony Biosciences  
630 W. Germantown Pike, Suite 215  
Plymouth Meeting, PA 19462  
**484-539-9800**

### Compliance

[harmonycompliance@harmonybiosciences.com](mailto:harmonycompliance@harmonybiosciences.com)

### Legal

[legal@harmonybiosciences.com](mailto:legal@harmonybiosciences.com)

To report a potential privacy breach:  
[privacy@harmonybiosciences.com](mailto:privacy@harmonybiosciences.com)

### Human Resources

General HR Inquiries:  
[HR@harmonybiosciences.com](mailto:HR@harmonybiosciences.com)

Confidential HR Inquiries:  
[HRConfidential@harmonybiosciences.com](mailto:HRConfidential@harmonybiosciences.com)

### REPORTING ADVERSE EVENTS AND QUALITY COMPLAINTS

To report an adverse event or quality complaint call Harmony Medical Information at **800-833-7460**.

Documentation associated with an adverse event report can be sent to Harmony Medical Information at [medinfo@HarmonyBiosciences.com](mailto:medinfo@HarmonyBiosciences.com).

## Communications and External Affairs

Harmony Communications:  
[communications@harmonybiosciences.com](mailto:communications@harmonybiosciences.com)

Harmony Social Media:  
[harmonysocial@harmonybiosciences.com](mailto:harmonysocial@harmonybiosciences.com)

Media Inquiries:  
[communications@harmonybiosciences.com](mailto:communications@harmonybiosciences.com)

## Investor Relations

[IR@harmonybiosciences.com](mailto:IR@harmonybiosciences.com)

## Medical Information

Forward **unsolicited requests for medical information** related to Harmony marketed products to Harmony Medical Information at [medinfo@harmonybiosciences.com](mailto:medinfo@harmonybiosciences.com) or the toll-free telephone line **800-833-7460**.

# EMPLOYEE HANDBOOK

Harmony employees should also reference the *Employee Handbook* for additional information on our Policies, Procedures, and Standards.

## Code Enhancement Disclosure

On February 15, 2023, Harmony Biosciences, Inc. ("Harmony") made the following enhancements to the Code of Conduct: Aligned Code to Harmony's mission, vision, and values; Summarized and organized key policies and procedures by the key pillars of Harmony's business; Expanded on Harmony's Environmental, Social Values, and Governance (ESG) focus areas; Increased awareness, engagement, and accountability around what Harmony does and how it conducts its business.

## REPORTING CONCERNS OF MISCONDUCT

You can **make an anonymous report** at any time through the EthicsPoint® website at [www.harmony.ethicspoint.com](http://www.harmony.ethicspoint.com), or by calling **844-696-3453**

**SPEAK UP**

