

**Code of Conduct  
and Business Ethics  
Guide**

conduct  
+ ethics

# From the Executive Committee

## The Importance of Ethics and Integrity

To achieve our vision of building a lasting company focused on serving patients, we must be dedicated to operating our company at all times with ethics and integrity. The Seagen Inc. Code of Conduct and Business Ethics Guide (“the Code”) is our statement of the core principles that guide our actions and business. Obeying laws and regulations is just the starting point: integrity, honesty, and ethics should be constant considerations in everything that we do. Although laws and customs will vary in different locations where we may operate, our basic ethical responsibilities are global.

Each of us must strive every day to maintain our awareness of the Code's guidance and to comply with the principles and intentions embodied in it to the best of our abilities. Before we take an action, we must always ask ourselves:

- Is this action in compliance with the law?
- Is this action ethical?
- Does it feel right?
- Could my action create an appearance of impropriety?

If an action would elicit the wrong answer to any of these questions, do not take it. Thank you for your care and attention to follow both the letter and the spirit of the Code.



diversity + respect

# Our Values



## Passion for helping patients

Revolutionizing therapy for people living with cancer



## Scientific excellence

Premier science empowers our passion



## Innovation

Entrepreneurial spirit advances breakthrough therapies



## Integrity

Honesty, respect, and trust guide us



## Diversity, teamwork & mutual respect

Shared dedication and diverse perspectives drive successful collaborations



## Great work environment

By working together to our full potential, we make a real difference in the world

# Integrity is Everyone's Responsibility

## To Whom Does the Code Apply?

The standards set forth in the Code apply to all directors, employees, and contractors of Seagen Inc. and its affiliates.

## Lead by Example

The Board of Directors, the company's Executive Committee and the Chief Compliance Officer are responsible for overseeing the ethics and compliance program and compliance with the Code.

A special word to our leaders and managers: you have a special responsibility for setting the right example. Your team members are observing your words, actions, and behavior. Please ensure the right tone is set by:

- Doing the right thing yourself;
- Modeling ethical behavior;
- Speaking about the importance of integrity and good ethics in decision making;
- Emphasizing that results must not be achieved at the expense of behaving the right way;
- Creating an atmosphere where difficult matters can be raised and no one is afraid to ask questions or raise concerns.

## What Are Your Individual Responsibilities?

- Read, understand, and follow the Code, and the laws, regulations and policies that apply to your role.
- If you see possible violations of the Code, our policies, and legal and regulatory requirements, speak up.
- Complete training on the Code, and certify that you understand and commit to the principles of the Code.
- Be truthful and fully cooperate in any internal investigations. Do not destroy or conceal information.
- Failure to read or attest to the Code does not change or reduce your responsibility to follow the Code.
- Violations of the Code or Seagen policy may result in disciplinary action up to and including termination.



**"At Seagen, we do things the right way. This means asking questions if you are unsure what to do."**

**Chip Romp**  
Executive Vice President,  
Commercial U.S.

# Safe and Respectful Workplace

A healthy, safe, and respectful environment is the foundation of a productive workplace. This environment extends beyond the physical surroundings and includes an atmosphere of mutual respect.

## ***Commitment to Diversity, Equity and Inclusion***

At Seagen, we believe that diversity, equity and inclusion are key elements in discovering, developing and bringing transformative therapies to patients with cancer. We are committed to fostering a diverse workforce and an inclusive culture that is representative of the patients we serve.

*Diversity, teamwork and mutual respect* is one of our corporate values. We strive to nurture an environment where all voices are welcomed, heard and respected. We value diverse perspectives and understand how they can drive innovation and successful collaboration.

Our commitments:

- Treat colleagues, vendors and others with dignity and respect.
- Provide a safe and healthy work environment.
- Encourage all voices to be heard and listen with an open mind.
- Ensure all employment decisions are based on skills, experience, ability, knowledge, education and performance.
- Do not discriminate on the basis of race, religion, ethnic or national origin, gender or gender identity, age, disability, sexual orientation or veteran status.

Seagen will not tolerate any form of unlawful discrimination or harassment.



# respect

# Compliance with Laws and Regulations

We operate in many countries around the world and must abide by the laws and regulations wherever we do business. Laws, regulations, and our policies may differ from location to location, so please consult your legal colleagues if you are unsure of what rules may apply.

## ***We Comply with Government Inquiries, Investigations, and Communications***

Governmental bodies are charged with making sure regulations and laws are followed in their area of responsibility. We will respond promptly, truthfully, transparently, and appropriately to inquiries and requests for information from governmental agencies. If you receive a request, you should contact our Legal team.



**“As we expand our business internationally with partners and on our own, it's important that we respect and adhere to the laws where we are operating.”**

**Natasha Hernday**

Executive Vice President,  
Corporate Development

policies

## We Understand the Responsibilities for Making Our Stock Available to the Public

Our stock trades on a public stock exchange. We and our employees are expected to abide by the financial laws applicable to us as a publicly traded company.

### ***We Never Buy or Sell Securities on Material Non-Public Information***

Information is “material” if a reasonable investor would consider it important in deciding whether to buy or sell a company’s securities. Information is “non-public” if it has not been broadly communicated to the investing public. Even though we may become aware of material, non-public information about our company or companies with which we do business:

- We must not communicate material, non-public information to any one else (for example, a spouse, relative or broker).
- We must not recommend, suggest or otherwise signal that anyone else trade in the securities of our company or any other company with which we do business based on material non-public information.
- We must not buy or sell any securities based on material non-public information.
- We will follow all other restrictions and guidance with respect to trading of our stock set forth in our policies and consult our legal colleagues if we have questions.



**“We must honor the responsibilities that come with being a publicly traded company.”**

**Todd Simpson**  
Chief Financial Officer

### ***Record Keeping and Reporting***

Truthful and accurate records are essential for the company’s reputation and the integrity of the markets in which we do business. The company’s business and accounting records, public disclosures, and reports and filings prepared for submission to a governmental agency must be truthful, accurate, fair, and understandable given their intended use.

The company’s accounting records must accurately and fairly reflect the underlying transactions. We must ensure that the reporting of business information within our control is accurate, honest, and timely. We will strive to maintain books and records that accurately and fairly reflect the company’s transactions as well as a system of internal controls that provide reasonable assurances that material information about the company is made known to management.

Employees are encouraged to raise issues and concerns regarding corporate fraud or other potential violations of law to their supervisor. If an employee prefers to not discuss certain sensitive matters with his or her supervisor, the employee may go directly to the Compliance or Legal teams or submit the complaint anonymously through the Compliance Hotline website.

responsible

# Ethical Business Practices

## We Are a Healthcare Company Where Trust and Confidence from Our Patients, Doctors, and Health Authorities is Foundational

We commit to:

- keeping medical professionals fully informed of the approved uses, safety, contraindications and side effects of our medicines;
- never providing gifts or entertainment to healthcare providers or healthcare institutes;
- never promoting the use of our medicines in a manner inconsistent with the authorized label for those medicines;
- deterring fraud and abuse in government healthcare programs;
- eliminating the improper influence of financial incentives on prescription of medicines or medical judgment;
- ensuring our employees and contractors who work to develop our medicines have never been excluded or debarred from working with healthcare regulatory bodies;
- protecting patients and improving the quality of healthcare services; and
- timely reporting on our financial interactions with healthcare professionals and healthcare institutions, including the disclosure of payments, meals, and other transfers of value.



**“The Code of Conduct doesn’t just guide our choices and actions...it reminds us of who we are and what Seagen strives to be.”**

**Lee Heeson**

Executive Vice President,  
Commercial International

## Improper Payments or Bribes

Seagen employees and contractors may not offer anything of value, directly or indirectly, to government officials or other persons to improperly influence or reward an official act or decision.

- We must prohibit corrupt payments of any kind, including payments to secure approvals or permits.
- We must refuse to pay or offer kickbacks or bribes.
- We must ensure that any travel or hospitality we offer to government officials or customers is reasonable and appropriate, and pre-approved when applicable.
- We must use only partners that have a reputation for integrity, and notice and report signs that a partner is failing to live up to Seagen’s ethical standards.
- If we make charitable donations, we may do so only to support a legitimate bona fide charitable cause, and not as part of any exchange of favors.
- We must hire candidates based on their merits, and not make hiring decisions to benefit a customer or government official.

ethics

## Patient Safety, Product Quality, Adverse Event Reporting

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To build trust with patients, doctors, and healthcare regulatory bodies, we must ensure our products are safe for their intended use and pass applicable quality standards. Employees must report concerns regarding product quality or safety, including concerns related to research and development activities or good manufacturing practices.

## Clinical Trials

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In developing our medicines, we are required to follow the laws and regulations related to the conduct of clinical trials. Key regulations and principles regarding clinical trials include the applicable national and international laws and guidance documents in individual countries governing the conduct of clinical trials and protection of patient personal data and guidance documents developed by international organizations. We also commit to collecting data with scientific integrity and disclosing results in a timely and accurate manner.



**“We have the honor of serving cancer patients, and with that honor comes the obligation to act in the highest ethical manner.”**

**Roger Dansey, M.D.**  
Chief Medical Officer

safety

# We Conduct Our Business with Integrity

## We Must Compete Fairly

Seagen's products must be marketed and sold fairly and honestly, solely on the basis of their quality, efficacy, safety, price and other appropriate attributes. The company intends to succeed in the marketplace by offering transformative medicines for patients, not by unethical or manipulative practices. Our employees are expected to deal fairly with all third parties, including vendors, financial institutions, competitors, and all others with whom employees interact for us. We are committed to obeying fair competition laws.

- We must not enter into any understandings or understandings with our competitors that limit or reduce competition.
- We must not dictate the prices that our independent channel partners charge their customers.
- If we gather competitive intelligence, we must use appropriate sources, be truthful, and not misrepresent who we are.



**“Conducting our business with integrity is an important part of our reputation and supports our mission of serving cancer patients worldwide.”**

**Jean Liu, J.D.**  
Chief Legal Officer

## Avoidance of Conflicts of Interest

We value our employees and depend on them to act in the best interests of Seagen.

All employees must be free from actual or potential conflicts of interest when dealing with other persons or business entities on behalf of Seagen.

A conflict of interest arises whenever a Seagen individual permits the prospect of direct or indirect personal gain to improperly influence the manner in which he or she conducts or appropriates the company's business.

### ***Situations to Watch out For:***

- doing business with family and friends;
- outside employment and other outside activities; and
- taking an opportunity for yourself or directing an opportunity to a relative or friend that could be a corporate opportunity.

Even the appearance of a conflict can damage your reputation and that of the company.

### ***Gifts and Entertainment***

We must not solicit gifts, hospitality, or travel from third parties, nor put them in a position where they feel obligated to provide something in order to do business with us.

If you are unsure of the appropriateness of accepting a gift please contact your supervisor or the Compliance team.

# Protecting Company Assets

We act responsibly by exercising good judgment to protect our company resources and property against waste, misuse, destruction, or theft, as well as any improper or illegal activity. Any act by a Seagen employee that involves fraud, embezzlement, or misappropriation of any funds or property (whether owned by Seagen or someone else) will not be tolerated. Company provided technology resources must be used with sound judgment, and used for personal reasons only if it does not interfere with our job responsibilities or harm our work environment. Corporate accounts, not personal accounts, must be used for business correspondence and data. Business-related information and data is company property, and may be accessed, preserved, and reviewed in accordance with our policies and applicable laws.

## Protecting Our Innovation

We are an innovation company. Protection of our intellectual property is critical to our business. Our Seagen employees are expected to protect our confidential information and data and follow practices to ensure that our valuable inventions are properly documented, and protected through legal filings. We also expect our employees to respect the intellectual property rights of third parties and refrain from improper disclosure or misuse of third party confidential information or data.



judgment

# We Value Our Reputation

## Privacy

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We understand the importance of respecting the privacy of our patients, customers, employees, and those with whom we do business. As such:

- We must follow applicable local privacy and data protection laws.
- We intend to honor commitments we make in contracts, protocols, and notices that pertain to personal data.
- We may only use personal data consistently with the expectations of those who have entrusted it to us.
- We may only share personal data on a “need-to-know” basis, with those who will protect it.
- We must follow company guidelines for storing and destroying personal data.
- We must employ appropriate security measures to protect personal data from loss and improper or unauthorized processing.
- If we become aware of the improper disclosure of personal data, or if we inadvertently receive individual information protected by HIPAA we must report it through appropriate company channels.

## Our Role in the Community

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What is said or written about Seagen can impact the company’s reputation and value. The company places great importance on maintaining effective, professional relationships with the news media and the investment community. Information provided to investors must be disclosed in a timely, accurate, and consistent manner, without selective or limited disclosure.

It is important that responses to any inquiries from the press, the financial community or other groups be directed to the Corporate Communications or Investor Relations department. Only those employees designated as Seagen spokespeople may speak for Seagen.

### ***Protect the Company’s Reputation***

In addition, we understand that our employees will have personal opinions that are not associated with their identity as an employee of Seagen. However, an employee’s private conduct and speech may be construed to be reflective of Seagen, therefore, employees should exercise sound judgment and prudence to ensure that their personal opinions are kept separate and do not reflect poorly on Seagen.

reputation

# Upholding These Standards

## Enforcement and Waivers

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The principles that form the Code are important and violations may result in disciplinary action, up to and including termination. Only the Board of Directors may waive a provision of the Code for a director or executive officer. Any waiver that is granted to a director or executive officer will be publicly disclosed as required by NASDAQ listing requirements and applicable laws, rules and regulations.

## You Are Encouraged to Ask Questions

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Employees are encouraged to ask questions about Seagen's policies, procedures, and practices and are expected to do so if they are unsure as to whether an action, activity, or decision is consistent with law, regulation, or company policy.

## Duty to Report Violations

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All Seagen employees have a duty to report suspected violations of the Code or other policies. The company needs to promptly know about concerns you have so that potential compliance or ethical issues may be investigated and addressed quickly and appropriately. When you make a report, you help yourself, your peers, and the company.

## How Do I Report?

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You may ask questions, submit reports of potential violations, or raise concerns in any of the following ways:

- Contact your manager or supervisor.
- Contact any member of senior management or Human Resources.
- You may contact any member of the Compliance team or send an email to [compliance@seagen.com](mailto:compliance@seagen.com).
- Where permitted by law, contact the Compliance Hotline at (800) 461-9330 or submit a concern online at the Compliance Hotline website. The hotline is staffed by an independent firm and is available 24 hours a day, 7 days a week. You may report anonymously if you choose. If you do choose to remain anonymous, it is not ethical and not possible for the company to determine your identity from the independent firm. You may instead choose to provide your name but request that your name be kept confidential by Seagen; your identity will be protected to the extent this is possible consistent with the company's interests and legal obligations.
- By mail to: Corporate Compliance, Seagen Inc., 21823 30th Drive SE, Bothell WA 98021.

## Non-Retaliation Policy

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We prohibit any form of retaliation or intimidation against a Seagen employee who reported a compliance concern in good faith or for good-faith participation in any investigation or other proceeding related to such a report, even if Seagen ultimately concludes that there was no violation. This includes reports made through the Compliance Hotline or any other appropriate means. If you believe you have been subject to unlawful retaliation you should alert your supervisor, Human Resources, or any member of the Legal and Compliance team. If it is determined that an employee experienced any retaliation in violation of this Policy, Seagen intends to take appropriate corrective action.

Any employee found to engage in retaliation or intimidation against an employee in violation of our policy on non-retaliation shall be subject to disciplinary action, up to and including termination, to the extent permitted by local laws.

## A Final Word

“Seagen’s Board of Directors and Executive Committee are committed to all of the principles detailed in our Code of Conduct and Business Ethics Guide. If you have any questions or concerns, we encourage you to discuss them with your supervisor, HR, or any member of the Legal and Compliance teams.”

**Sulaiman Qazi**

Senior Vice President & Chief Compliance Officer



integrity