

# **Code of Business Conduct and Ethics**

### Introduction

At BridgeBio Pharma, Inc., including its affiliates and subsidiaries worldwide, ("BridgeBio" or the "Company") we are committed to finding and developing solutions to meet unmet medical needs. Delivering on this commitment is the focus of our work; however, *how* we do this work is as important as the results we get.

Everyone conducting business on behalf of the Company worldwide, is expected to maintain the highest standards of integrity and business and professional conduct and comply with all applicable laws and regulations.

This *Code of Business Conduct and Ethics* (the "Code") outlines our minimum expectations and should be used as a tool by all Company employees and directors ("Company Personnel"), as well as contractors, consultants and other third parties acting on BridgeBio's behalf ("Company Contractors"), to guide their decisions and activities.

At BridgeBio we enjoy an environment of open communications and we wish for everyone to be able to speak up if they have any questions or concerns or feel this Code or any of our policies are being violated. Company Personnel should speak with their manager, or with anyone in the leadership team, or feel free to share concerns anonymously via our BridgeBio hotline <a href="https://bridgebio.ethicspoint.com">https://bridgebio.ethicspoint.com</a> or dial toll-free, within the United States, Guam, Puerto Rico and Canada: **844-946-0416**.

## **BridgeBio Compliance and Ethics Program**

We have established a compliance program designed and implemented to ensure adherence to all relevant laws and regulations as well as the ethical standards reflected in this Code. It includes policies and procedures with more detailed guidance for specific functions and activities.

Our program is overseen by the CEO of BridgeBio, the Head of Legal Affairs, and the Nominating & Governance Committee of the Board of Directors. These individuals and groups are responsible for the program, including:

- Ensuring an effective Compliance Program;
- Directing management focus to areas of our business that by their nature may present compliance risks;
- Ensuring that all BridgeBio employees are appropriately trained on this Code of Business Conduct and Ethics and the policies that support it;
- Routinely assessing whether the goals and principles of our Code of Business Conduct and Ethics are being upheld;



- Fostering an "open-door" environment where questions or concerns related to conduct and ethics can be appropriately addressed;
- Ensuring that BridgeBio's responsibilities to governments and regulators are followed;
- Directing investigations of any alleged violation of this Code and company policies and procedures;
- Ensuring that appropriate actions are taken if there is a substantiated violation;
- Identifying and implementing any updates or changes to the Company's Compliance Program or other compliance initiatives that may be necessary, and
- Championing a culture of compliance throughout BridgeBio.

Compliance is everyone's responsibility. We look to every functional, departmental and team leader to foster a culture of compliance where they lead by example and ensure the spirit and letter of this Code and related policies are being followed. In addition, employees are expected to guide consultants, vendors, contract workers and temporary staff working in their areas to act in a manner consistent with this Code and related policies.

## **Understanding and Complying with Laws and Regulatory Requirements**

All Company Personnel and Company Contractors are expected to conduct all activities in accordance with the letter and spirit of applicable laws, regulations, and written directives.

We expect Company Personnel to understand the requirements applicable to their functions and areas of responsibility. While we do not expect all Company Personnel to know the intricate details of the underlying laws and regulations, we do expect them to understand, know and comply with the relevant policies and procedures which are based on those laws and regulations. We provide initial and periodic training in a variety of ways, including live and online sessions. We also expect Company Personnel to use the resources we make available to them and for them to ask when in doubt.

### **Honesty with Regulators and Other Government Officials**

BridgeBio is subject to many laws, regulations, and guidelines. Particular care must be taken to ensure that no inaccurate, incomplete, or misleading reports, certifications, claims, or statements are made to any government agency or official. When dealing with government officials and employees, Company Personnel and Company Contractors should avoid even the appearance of impropriety. Any activity, anywhere in the world, that could be perceived as an attempt to improperly influence or mislead government officials to obtain favorable treatment or for any other purpose is strictly prohibited. Local custom or common practices are not a basis for permissible activity.

### Maintenance of Corporate Books, Records, Documents and Accounts

All BridgeBio records must be prepared accurately, truthfully, and in a timely manner. The making of false or misleading entries in any BridgeBio record is strictly prohibited.



Financial activities are to be recorded in compliance with all applicable laws, regulations and accounting practices. All Company Personnel must cooperate fully with the Finance Department and their designees and provide complete and accurate information to them to help ensure that all of BridgeBio's financial books, records and reports are accurate.

## **Scientific Integrity**

Research integrity is fundamental to the scientific process and to BridgeBio's ability to bring novel products to market. All BridgeBio research and development must be conducted according to all applicable laws and regulations, authorship rules reporting requirements, and the generally accepted ethical standards of the scientific community. Scientific misconduct, such as fabrication, falsification, or plagiarism in proposing, conducting, or reporting research, disregards the intellectual contributions and property of others, and impedes the progress of research, and corrupts the scientific record and is not consistent with BridgeBio's ethical standards.

## Science, Clinical Program and Approved Product Communications

It is Company policy to communicate about our science, clinical programs and products in an accurate, fair and informative manner which is consistent with applicable regulations. Company Personnel and Company Contractors must describe the Company's science, clinical programs and/or approved products in a truthful, balanced, complete and non-misleading or deceptive manner. It is also Company policy to use only medical, sales and marketing programs and materials that have been approved in accordance with Company policies and procedures.

## **Confidential, Private, and Proprietary Information**

The protection of confidential business information and trade secrets is vital to the interests and success of BridgeBio. Such information should not be shared, unless it is necessary to do so in the performance of a job or activity, and such sharing is covered by a confidentiality agreement.

Company Personnel or Company Contractors may learn of information about BridgeBio, or about third parties that have shared information with BridgeBio under confidentiality agreements, that is confidential and proprietary. Company Personnel or Company Contractors also may learn of information before that information is released to the general public. Company Personnel and Company Contractors who have received or have access to confidential information should take care to keep this information confidential.

Confidential information includes non-public information that might be of use to competitors or harmful to BridgeBio or its customers if disclosed, such as business plans, scientific and technical strategies, financial information, information related to BridgeBio's research platform, data and results, inventions, works of authorship, trade secrets, processes, conceptions, formulas, patents, patent applications, licenses, suppliers, manufacturers, customers, market data, personnel data, personally identifiable information pertaining to our employees, trial



participants, customers or other individuals (including, for example, names, addresses, telephone numbers and social security numbers), and similar types of information provided to us by our customers, suppliers and partners. This information may be protected by privacy, patent, trademark, copyright and trade secret laws.

Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance our interests.

All Company Personnel are required to sign agreements promising they will not divulge BridgeBio's proprietary information or material outside of BridgeBio and that the ideas, inventions, products, and processes developed while working for BridgeBio are the property of BridgeBio.

## Protection and Proper Use of the Company's Assets

BridgeBio's assets include its intellectual property rights, equipment, physical servers and communication facilities, among other items. Loss, theft and misuse of BridgeBio's assets have a direct impact on the company's business and its financial status. Company Personnel are expected to protect the company's assets that are entrusted to them and to protect BridgeBio assets in general. Company Personnel are also expected to take steps to ensure that BridgeBio's assets are used only for legitimate business purposes.

Upon termination of employment or other engagement with BridgeBio, Company Personnel shall return to and not take from BridgeBio any BridgeBio property, including, but not limited to: (a) any inventory, material, supply, communication, correspondence, document or product; (b) any idea, invention, and/or process that was developed while working for BridgeBio; (c) any form of reproduction or copy of any of (a) or (b) above, including without limitation any electronic (e.g., email) versions; and/or (d) any proprietary or confidential property or information of BridgeBio as defined in BridgeBio's Proprietary Information and Inventions Agreement.

## **Conflicts of Interest**

Company Personnel must avoid any relationship or activity that might affect, or even appear to affect, their ability to make objective and fair decisions when performing their duties for BridgeBio. A conflict of interest may arise when Company Personnel:

- Allow a personal or outside interest to interfere with or influence the performance of their duties;
- Make a decision or engage in conduct that is not in the best interest of BridgeBio;
- Are presented with a personal or financial interest or opportunity for themselves or their friends or family;



• Are asked to be on the Board of, or to perform services for or assist, any entity that is a competitor or vendor of BridgeBio.

Determining whether a conflict of interest exists is not always easy to do. Company Personnel must seek review from their manager as well as our Legal department before engaging in any activity, transaction or relationship that may give rise to a conflict. The Legal department can assist with evaluating potential conflicts and should be consulted when Company Personnel are unsure whether an activity poses a conflict of interest. The Legal department is responsible for determining whether there is in fact a conflict of interest and will recommend appropriate actions.

## Antitrust Compliance

It is the policy of the Company to comply with all provisions of the U.S. federal and state and foreign antitrust and unfair competition laws. These laws are designed to promote fair and vigorous competition, unrestricted by anti-competitive agreements and practices. Antitrust laws generally prohibit competitors from sharing competitively sensitive information (such as pricing) and fixing prices or other terms or conditions of sale, rigging bids, allocating customers and markets, and otherwise agreeing not to compete. To prevent even the appearance of illegality, Company Personnel should not discuss (orally or in writing) any of these subjects with a competitor without first discussing with the Company's Legal department.

## **Corporate Opportunities and Insider Trading**

Company Personnel may not take personal advantage of corporate opportunities, such as those presented to Company Personnel or discovered by them as a result of their position within the Company or through the use of BridgeBio property or information. Even opportunities that are acquired privately by Company Personnel may be questionable if they are related to our existing or proposed lines of business. Company Personnel may not use their position with BridgeBio or Company confidential or proprietary information for improper personal gain, nor can Company Personnel compete with BridgeBio in any way.

It is generally illegal for any officers, directors, employees and certain others the Company has identified as "Insiders" to trade in the securities of the Company while in the possession of material, non-public information about the Company. It is also generally illegal for any Company Personnel to disclose material, nonpublic information about the Company to others who may trade on the basis of that information. These illegal activities are commonly referred to as "insider trading." For additional details, please refer to the Company's Statement of Company Policy on Insider Trading and Disclosure.

## **Fair Dealing**

Competing ethically, vigorously, yet lawfully, with competitors and establishing advantageous, but fair, business relationships with customers and suppliers is a part of the foundation for long-term success. Unlawful and unethical conduct, which may lead to short-term gains, may



damage a company's reputation and long-term business prospects, as well as subjecting the Company and relevant individuals to criminal and civil liability. Accordingly, it is the Company's policy that Company Personnel must endeavor to deal ethically and lawfully with the Company's collaborators, customers, suppliers, and competitors in all business dealings on the Company's behalf. Company Personnel should not take unfair advantage of another person or entity in business dealings on the Company's behalf including through the abuse of privileged or confidential information or through improper manipulation, concealment or misrepresentation of material facts.

## Bribes, Kickbacks and Other Improper Transfers of Value

The Company does not permit or condone bribes, kickbacks or other improper payments, transfers or receipts. No Company Personnel or Company Contractors should offer, give, solicit or receive any money or other item of value for the purpose of obtaining, retaining or directing business or bestowing or receiving any kind of favored treatment. In particular, the U.S. Foreign Corrupt Practices Act ("FCPA") prohibits any U.S. individual or business from authorizing, offering or paying money or anything of value, directly or indirectly, to any foreign official or employee, political party, or candidate for public office for the purpose of obtaining or maintaining business or for any other business advantage.

In addition, the federal Anti-Kickback Statute makes it a criminal offense to knowingly and willfully offer, pay, solicit, or receive any remuneration to induce or reward referrals of items or services reimbursable by a Federal health care program. Violation of the FCPA or Anti-Kickback Statute could subject the Company and its individual directors, officers and employees to serious civil and criminal penalties.

## **Offering Business Courtesies**

Other than to our government customers, for whom special rules apply, we may provide certain nonmonetary items (i.e., approved product promotional or support materials) to our customers. Further, management may approve other courtesies, including meals and refreshments, of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization;
- The business courtesy is consistent with industry practice and company policies, is infrequent in nature and is not lavish;
- The business courtesy is properly reflected on the books and records of BridgeBio.

Company Personnel who offer a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon BridgeBio. Company Personnel may never use personal funds or resources to do something that cannot be done with BridgeBio resources.



## **Political Contributions**

Business contributions to political campaigns are strictly regulated by federal, state, provincial and local law in the United States, Canada and other jurisdictions. Accordingly, any political contributions proposed to be made with the Company's funds must be coordinated through and approved by the Company's Legal department. Company Personnel may not, without the approval of the Company's Legal department, use any of the Company's funds for political contributions of any kind to any political candidate or holder of any national, state, provincial or local government office.

Company Personnel may make personal contributions but should not represent that they are making any such contribution on the Company's behalf. Similar restrictions on political contributions may apply in other countries. Specific questions should be directed to the Legal department.

## **Discrimination in Employment and Sexual Harassment**

Company Personnel must respect the rights and cultural differences of individuals. BridgeBio is also committed to following the applicable laws pertaining to freedom of association, privacy, child labor, and employment discrimination.

BridgeBio prohibits all forms of unlawful discrimination, retaliation, and harassment in the workplace, including, but not limited to, unlawful discrimination on the basis of race, color, religion, sex, national origin, citizenship, sexual orientation, age, physical or mental disability, veteran status, or any other legally protected status. BridgeBio also strives to achieve a work environment that is free from unlawful discrimination, retaliation, and harassment, including sexual harassment. All Company Personnel, Company Contractors, clients, or visitors to the work environment must uphold this policy.

## **Environment, Safety and Sustainability**

BridgeBio is committed to a safe environment and to taking sound environmental actions. BridgeBio strives to comply fully with all environmental and safety laws and regulations.

It is our policy to conduct our business in an environmentally responsible and sustainable way that minimizes environmental impacts and promotes the sustainable use of resources. We are committed to bringing our novel product candidates to patients. We are equally committed to minimizing the use of any substance or material that may cause environmental damage, reducing waste generation and disposing of all waste through safe and responsible methods, minimizing environmental risks by employing safe technologies and operating procedures, and being prepared to respond appropriately to accidents and emergencies.

## **Monitoring Compliance and Disciplinary Action**

The Company's management, under the supervision of its Board or a committee thereof or, in the case of accounting, internal accounting controls, auditing or securities law matters, the



Audit Committee of the Board of Directors (the "Audit Committee"), shall take reasonable steps to (i) continually monitor compliance with the Code and related policies, (ii) from time to time conduct audits and investigations, and (iii) when appropriate, impose and enforce appropriate corrective, preventive and/or disciplinary measures.

Disciplinary measures for violations of the Code will be determined in the Company's sole discretion and may include, but are not limited to, counseling, oral or written reprimands, warnings, probation or suspension with or without pay, demotions, reductions in salary, termination of employment or service, and/or restitution.

The Company's management shall periodically report to the Board or a committee thereof on these compliance efforts including, without limitation, periodic reporting of alleged violations and the actions taken.

## **Communication of The Code**

All Company Personnel are supplied with a copy of the Code, at a minimum, upon employment and thereafter every 2 years, and are asked to review and sign an acknowledgment regarding the Code. A copy of the Code is also available in internal legal and/or human resources websites and at <u>www.bridgebio.com</u>. In addition, consultants, contractors and temporary staff are encouraged to review the Code at the beginning of their engagements.

## **Reporting Concerns and Potential Violations, Requesting Advice**

### **Communication Channels**

All Company Personnel have a responsibility, and BridgeBio provides the ability, to report any potential misconduct, including, but not limited to: discrimination, harassment, and violations of BridgeBio's policies concerning accounting, internal accounting controls, disclosure controls or auditing matters, illegal activities in any country in which BridgeBio operates, fraud, abuse of assets, violations of the standards in this Code, and violations of any BridgeBio's policies.

Company Personnel who believe but are not certain that misconduct or an improper activity may have occurred, are encouraged to discuss their concerns with their manager, with the Legal department or with any member of the Executive Committee. These discussions are kept confidential to the extent possible, consistent with conducting a thorough investigation.

An anonymous hotline has been set up so that all anonymous reports route to the Legal department, and our VP of People, as appropriate, who will inform the appropriate members of senior management and, if appropriate, members of the Board of Directors.

Anonymous reports that concern accounting and auditing matters, e.g., embezzlement; falsification of contracts, reports, or records; securities violations; and violations of other financial-related policies, will be routed to the Head of Legal Affairs and the Chair of the Audit



Committee of the BridgeBio Board of Directors. Anonymous reports that concern the Head of Legal Affairs and the VP of People will be routed to the Chair of the Audit Committee.

#### **Investigative Procedures**

Upon learning of an allegation of misconduct, the Legal department will conduct a timely, full, and fair fact-finding to determine whether a violation has indeed occurred. The Legal department will seek advice and assistance from the Chief Financial Officer, the Board of Directors (or appropriate Board Committees), and/or outside counsel, as necessary during investigations.

#### Hotline

The BridgeBio Hotline can be reached via <u>https://bridgebio.ethicspoint.com</u> or dial toll-free, within the United States, Guam, Puerto Rico and Canada: **844-946-0416**.

### Anonymity

When reporting suspected violations of the Code, the Company prefers that Company Personnel identify themselves in order to facilitate follow-up and additional investigation. However, the Company also recognizes that some personnel may feel more comfortable reporting a suspected violation entirely anonymously.

If Company Personnel wish to remain anonymous, they may do so, and the Company will use reasonable efforts to protect the confidentiality of the reporting person subject to applicable law, rule or regulation or to any applicable legal proceedings. In the event the report is made anonymously, however, the Company may not have sufficient information to look into or otherwise investigate or evaluate the allegations. Accordingly, persons who make reports anonymously should provide as much detail as is reasonably necessary to permit the Company to evaluate the matter(s) set forth in the anonymous report and, if appropriate, commence and conduct an appropriate investigation.

### **No Retaliation**

The Company expressly forbids any retaliation against any Company Personnel who, acting in good faith on the basis of a reasonable belief, reports suspected misconduct. Specifically, the Company will not discharge, demote, suspend, threaten, harass or in any other manner discriminate against, such an officer or employee in the terms and conditions of his or her employment. Any person who participates in any such retaliation is subject to disciplinary action, including termination.

### **Waivers and Amendments**

No waiver of any provisions of the Code for the benefit of a director or officer (which includes without limitation, for purposes of this Code, the Company's principal executive, financial and accounting officers) shall be effective unless (i) approved by the Board or, if permitted, the Audit Committee, and (ii) if applicable, such waiver is promptly disclosed to the Company's



stockholders in accordance with applicable U.S. securities laws and/or the rules and regulations of the exchange or system on which the Company's shares are traded or quoted, as the case may be.

Any waivers of the Code for other Company Personnel may be made by the Head of Legal Affairs, the Board or, if permitted, the Audit Committee.

All amendments to the Code must be approved by the Board or the Audit Committee and, if applicable, must be promptly disclosed to the Company's stockholders in accordance with applicable U.S. securities laws and the rules and regulations of the stock exchange or system on which the Company's shares are traded or quoted, as the case may be.

EFFECTIVE: May 29, 2019 UPDATED: November 13, 2020

