

**Ionis Pharmaceuticals, Inc. Comprehensive Compliance Program Statement  
and  
Annual Compliance Declaration with California Health & Safety Code §119400 - 119402**

**Introduction**

Ionis Pharmaceuticals, Inc. (Ionis) is committed to complying with all applicable laws, regulations and industry standards.

Ionis has developed a Comprehensive Compliance Program in accordance with the Compliance Program Guidance for Pharmaceutical Manufacturers published by the U.S. Department of Health and Human Services Office of Inspector General in April 2003 (OIG Guidance) and which includes policies consistent with the Pharmaceutical Research and Manufacturers of America (PhRMA) Code on Interactions with Health Care Professionals (PhRMA Code).

**Ionis Comprehensive Compliance Program**

**1. Compliance Oversight**

The Ionis Compliance Program has been established to oversee the development, management and deployment of the program's key initiatives through the direction of our designated Senior Vice President and Chief Compliance and Quality Assurance Officer (SVP CCO). The SVP CCO reports to the Executive Vice President, Chief Legal Officer & General Counsel and has a direct line to the Board of Directors on any compliance-related matters.

Ionis has established the Ionis Executive Compliance Committee that is comprised of senior-level representatives from various functions to assist in the implementation and oversight of our compliance program. In addition, Ionis has established a Compliance Committee of the Board of Directors with responsibility for general oversight of the Compliance Program.

**2. Written Standards**

The Ionis Compliance Program includes appropriate policies, procedures, and guidance documents related to healthcare compliance, including the Code of Ethics and Business Conduct (the "Code"). Our Code describes Ionis' values, principles, and provides the framework for our daily business actions. Taken together, these documents are designed to meet the standards of applicable laws and regulations including California Health & Safety Code §§ 119400-119402, PhRMA Code, and OIG Compliance Guidance.

### **3. Education and Training**

Ionis employees are trained on applicable policies and procedures. Additionally, the Compliance Program delivers trainings in various formats based on the policies, standard best practices and operational needs of the business to ensure that carrying out business responsibilities meets our compliance obligations.

### **4. Internal Lines of Communication**

Ionis urges all employees to speak up when they know of, or suspect, a violation of Ionis' Code, policies and procedures, or any laws, regulations, or industry codes with which Ionis must comply. Ionis encourages employees to report all known or suspected instances of non-compliance and any questions or concerns.

Ionis does not tolerate retaliation against anyone who raises a concern in good faith. Employees may report compliance concerns or ask questions by contacting a manager, the human resources department, the compliance or legal departments, or Ionis' 24-hour Helpline.

### **5. Auditing and Monitoring**

Ionis' Compliance Program routinely audits and monitors key business activities that allow us to demonstrate adherence to the Code and Ionis' policies and procedures. Our intent with auditing and monitoring is to ensure the program is operating effectively. The nature of our reviews as well as the extent and frequency of our compliance monitoring and auditing can vary due to several factors, including new regulatory requirements, changes in business practices, and other risk considerations. We will regularly assess our Compliance Program to identify and address new and emerging risk areas.

### **6. Responding to Potential Violations and Corrective Actions**

Ionis evaluates all reports of non-compliance with the Code, policies or procedures, or any laws, regulations, or industry codes with which Ionis must comply in a timely manner and, if appropriate, will conduct a prompt, thorough investigation. Each matter is assessed on a case-by-case basis, and corresponding disciplinary action to address inappropriate conduct and deter recurrence is consistently implemented.

Ionis will take appropriate corrective action for substantiated violations Ionis' Code, polices or procedures, or any laws, regulations, or industry codes of which Ionis must comply. Corrective action may include coaching, training, or discipline up to and including termination of employment.

## **7. Statement of Annual Aggregate Limit**

As part of the Compliance Program, Ionis has established a specific annual aggregate dollar limit of \$2,500 on gifts, items or activities Ionis may give or otherwise provide to an individual medical or healthcare professional in California on an annual basis. This limit may be revised from time to time by Ionis in its sole discretion, in which case the revised limit will be published in this section of the Ionis website within a reasonable period of time following revision. This limit represents an expenditure cap and not a goal or an average expenditure amount. The Company has established an internal monitoring system designed to help ensure compliance with the annual spending limits in California.

The annual limit does not include the following expenditures:

- Drug samples given to physicians and healthcare professionals;
- Financial support for continuing medical education programs;
- Financial support for health educational scholarships;
- Payments for legitimate professional services, and any meals or expenses associated with the provision of such services; and
- Patient educational materials provided to patients by their physician with the purpose of educating the patient or enhancing the patient's understanding or management of the condition

### **Declaration of Compliance**

Ionis declares, to the best of its knowledge, as of October 14, 2025, that the company is in compliance with its Comprehensive Compliance Program and the requirements of the California Health & Safety Code §119400-119402. This declaration is based on Ionis' review and understanding of the California Health & Safety Code §119400-119402 including the key components of a Comprehensive Compliance Program and the annual, established aggregate limit. Ionis will update this declaration on an annual basis. A copy of Ionis' Comprehensive Compliance Program and this Declaration may be requested by emailing [compliance@ionis.com](mailto:compliance@ionis.com) or by calling (833) 644-6647.