

Iveric Bio Code of Business Conduct and Ethics: *Our Vision for Integrity*

CEO Message

Introduction

- Our Code Represents Our Vision for Integrity
- Our Values Guide Our Code
- Why Do We Have a Code?
- Who Must Follow the Code?
- How Should We Use the Code?
- Our Vision for Integrity Drives Our Decision Making
- We Speak Up
 - How Do I Speak Up?
 - Additional Responsibilities for Managers
 - You Will Be Heard
 - No Retaliation

We see integrity ... in our business relationships and interactions.

- We Compete Fairly
- We Don't Tolerate Bribes or Kickbacks
- We Avoid Inappropriate Gifts and Entertainment
- We Follow All Trade Controls

We see integrity ... in good professional judgment.

- We Recognize and Disclose Conflicts of Interest
- We Trade Securities Lawfully
- We Engage Third Parties Responsibly

We see integrity... in the protection of our assets.

- We Comply With Data Privacy Laws
- We Protect Our Assets and Information
- We Safeguard Our Intellectual Property

We see integrity ... in how we comply with industry regulations and standards.

- We Prioritize Our Patients
- We Manufacture and Distribute Safe and High-Quality Products
- We Interact With Healthcare Professionals Appropriately
- We Promote Our Products Compliantly

We see integrity ... in our commitment to transparency in our business and operations.

- We Communicate Responsibly
- We Provide Transparency in Our Financial Processes and Results
- We Practice Good Records Management

We see integrity ... in the way we treat one another and our surroundings.

- We Respect Each Other and Promote a Diverse, Equitable, and Inclusive Workplace
- We Create and Maintain a Safe and Healthy Workplace
- We Care About the Environment and Our Surrounding Communities

Conclusion

Code Administration

CEO Message

At Iveric Bio, our mission is to deliver transformational therapies for people with retinal diseases. By working to achieve that goal every day, we strive to make a difference for patients, caregivers, healthcare professionals and all our stakeholders. Our focus on scientific innovation and our commitment to helping people with retinal diseases drive everything that we do.

That is what we do, but it is only part of who we are. We are a team that brings passion to our work. We look beyond no and ask how. We speak honestly and openly and treat each other with respect. We care about our environment. Our ways of working reflect our commitment to the highest standards of integrity and align with our values and principles. These are the behaviors that make us an outstanding team and are reflected in our Code of Business Conduct and Ethics.

Our Code of Business Conduct and Ethics represents the standards, values, and expectations we set for ourselves and how we incorporate them into our work every day. It is a resource for you that lays the foundation for ethical business conduct and serves as a guide for operating the right way with colleagues and stakeholders. The principles and behaviors outlined in the Code make up the DNA of our company and embracing them is essential to achieving our mission.

I am firmly committed to the standards, values, and expectations in our Code of Business Conduct and Ethics, and I ask that you all make the same commitment to our vision of integrity.

Thank you.

Glenn P. Sblendorio

Chief Executive Officer

A handwritten signature in black ink, appearing to read 'Glenn P. Sblendorio', written in a cursive style.

Introduction: Our Vision for Integrity

The Code Represents Our Vision for Integrity

At Iveric, we deliver transformational therapies for people with retinal diseases so they can live with hope in sight. As we work together to pioneer these transformational retina therapies, we are dedicated to making a meaningful impact on everyone that is affected by our work. We hold ourselves to the highest standards of integrity and incorporate our values throughout the important work we do.

Our vision for integrity aligns with our Values:

Our Values

- Every person matters.
- We look beyond “no” and ask “how.”
- Big impact comes from courageous decisions.
- Trust begins with transparency.
- We see patients as people.

Why do we have a Code?

This Code reflects our values and serves as a framework for how we conduct business ethically and with integrity, and it enables us to establish trust with each other and with everyone that depends upon us. Our Code reinforces the way that we do business at Iveric and provides a high-level overview of the most important things to keep in mind as we work here.

This Code is just one part of the Company’s overall program to ensure that all employees follow the appropriate standards and comply with all legal requirements that affect the manner in which the Company conducts its business, including industry guidelines and local laws, regulations, and guidance in each country in which we do business. Although this Code covers a wide range of business practices and procedures, it cannot cover every issue that may arise.

Who must follow the Code?

We expect everyone who works at Iveric — including all employees, officers, and directors — to embody our Values and Code of Conduct by doing the right thing and complying with company policies and applicable laws and regulations in every part of our operations. We will all participate in training on the Code and attest to adherence to the Code every year. Failure to comply with this Code may result in disciplinary action up to and including termination.

How should we use the Code?

- Use it as a guide for making ethical decisions when at work.
- Use it as a reference to additional policies which provide greater detail.
- Use it to navigate to Iveric’s channels for speaking up.
- Use it as a reminder of our commitment to our Values.

- Use it to remind ourselves that our commitment to improve the lives and health of our community is at the heart of the decisions we make every day.

Our Vision for Integrity Drives Our Decision Making

There may be times when we find ourselves having to make decisions when the right choice is not always clear. In these situations, it can be helpful to work through the following questions:

- Is it legal?
- Does it comply with our Code and policies?
- Does it reflect our Values?
- Does it preserve our reputation?
- Are we being honest and fair?

Speaking Up

We expect each other to raise concerns if we see them and ask questions if we have them. Misconduct can happen anywhere, even at a Company where everyone cares about integrity. When we speak up early, we can often help prevent misconduct or mitigate the potential damage.

It isn't always simple.

It isn't always clear.

But every voice matters. Use yours.

Our responsibility is to ensure that you can:

- freely speak up, knowing that your concerns will be handled confidentially
- raise concerns without fear of retaliation
- feel heard

Your responsibility is to:

- speak up
- tell the truth

What kind of concerns should you raise?

- Dishonesty of any kind
- Discrimination
- Harassment
- Theft
- Fraud
- Bribery/gifts
- Safety
- Violations of laws
- Deviation in clinical trials or research protocols
- Violations of maintaining privacy and cybersecurity safeguards

- Documentation irregularities
- Any business practice that is inconsistent with Iveric Bio policies

Where might you observe concerns?

- Interactions with colleagues
- Interactions with suppliers
- Interactions with customers
- Your own actions

How do I speak up?

It's often best to start with your Supervisor. But there are other resources at the Company that can help.

Talk to any one of these Compliance Resources:

- Your Supervisor
- Human Resources
- Compliance Officer
- The Helpline

Report Concerns. Ask Questions. Call the Helpline.

- **Be anonymous or not — just be heard.**
- **Mobile: ivericbiomobile.ethicspoint.com**
- **Online: ivericbio.ethicspoint.com**
- **Phone: 833-416-6268**



Scan for direct link to mobile Helpline

Additional Responsibilities for Supervisors

When employees approach supervisors with questions and concerns, they are trusting their supervisors to take their concerns seriously. Supervisors must:

- Listen carefully
- Thank them for speaking up and reassure them that the Company will take their report seriously, maintain confidentiality, and evaluate concerns fairly
- Always follow our procedure for responding to raising concerns, including seeking help from the Compliance Officer and other resources when needed
- Take appropriate action

You Will Be Heard.

Iveric will investigate all reports of potential violations of the Code, company policy, or the law.

We expect anyone involved in an investigation to be truthful and cooperative throughout the process. Those at Iveric involved in conducting any investigation will keep information about the investigation confidential, to the extent possible.

No Retaliation

Iveric has a zero-tolerance policy for retaliation. We are committed to supporting anyone who speaks up about a potential violation or potential misconduct. Individuals who report their concerns in good faith must never face mistreatment.

Retaliation violates our Code — and often, it can violate the law. If you ever feel that you are treated differently for asking a question or raising a concern, speak up.

Related Resources:

[Whistleblowing Policy](#)

[Investigation Policy](#)

We See Integrity ... in our business relationships and interactions.

We Compete Fairly

Competition and antitrust laws are designed to promote a fair marketplace. At Iveric, we win business based on the strength of our therapies. We commit to making our therapies available to patients fairly and in compliance with all antitrust and competition laws. We never abuse or appear to abuse our market position, and we avoid illegal activities and practices that unreasonably restrict or appear to restrict competition. We do not mislead the public to give ourselves a competitive advantage. We collect, share, and use information about our competitors and our markets legally and ethically.

Together, we must:

- Follow the antitrust and competition laws that apply to Iveric
- Exercise caution in meetings when competitors are present, keeping in mind that any meeting with a competitor may give rise to the appearance of impropriety; notify the Compliance Officer if you are required to meet with a competitor for any reason
- Never discuss the Company's pricing strategies or competitive terms or any other proprietary, competitively sensitive information with competitors
- Never try to win business by making unsupported or damaging statements about our competitors
- Collect competitive information fairly and only through appropriate channels

Focus In On ... Agreements Between Competitors

There is never a place for agreements with competitors that harm the marketplace. Examples of off-limits agreements with competitors include:

- Agreements that fix or impact prices
- Agreements that affect terms or conditions of sale or fair competition
- Agreements to divide territories or customers

The Big Picture

We could not be prouder of the therapies we are developing. Our commercial success will be a result of the strengths of our therapies — not a result of unethical sales practices.

We don't tolerate bribes or kickbacks.

At Iveric, we prohibit all forms of bribery and corruption, everywhere we operate. We do not offer bribes to, or accept bribes from, any government officials, Health Care Professionals (HCPs), commercial business partners, or anyone else. We must avoid actions that could even suggest improper influence and never engage a third party to engage improperly on our behalf. We expect honesty and transparency from everyone who conducts work on our behalf.

Together, we must:

- Be mindful of all anti-bribery and anti-corruption laws that apply to our work at Iveric, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and the U.S. Federal Anti-Kickback Statute
- Never offer anything of value to influence or attempt to influence a business decision
- Never accept a bribe or solicit one
- Never hide or attempt to conceal a payment
- Follow the Company's due diligence policies before engaging with third parties
- Oversee third parties carefully, confirming that their actions comply with our policies
- Record all transactions and payments truthfully and on time
- Abide by the specific rules and regulations that apply to our work with government officials including HCPs who work for governmental healthcare systems or at state-owned institutions

Focus In On ... Bribes and Kickbacks

What are bribes and kickbacks? A bribe or a kickback is any money, fee, commission, credit, gift, gratuity, thing of value, or compensation of any kind that is provided, directly or indirectly, to improperly obtain or reward favorable treatment in a business transaction.

There are many laws around the world prohibiting bribes and kickbacks. In particular, it is illegal under the Anti-Kickback Statute for healthcare providers to offer or accept gifts, bribes, payments, or other financial incentives in exchange for referrals, prescriptions, or other medical services when those services will be paid for partly by any federal healthcare program, such as Medicare or Medicaid.

We are also responsible for the actions of our agents. A payment to an agent acting on the Company's behalf can be considered a bribe or kickback if there is a reason to believe that the payment will be used indirectly for a prohibited purpose.

Be on the Lookout For ...

Remember that we can be held liable for the actions of third parties. For this reason, it is important that we oversee their work carefully. If you work with third parties:

- Follow Iveric's policies for vetting and hiring third parties
- Do not engage with any individual or organization who is known to have paid a bribe or engaged in other misconduct
- Carefully oversee the activities of our agents and consultants to make sure they follow our policies
- Contact the Compliance Officer if you have any concerns about misconduct or potential misconduct or if you feel pressured to accept or offer a bribe

The Big Picture

We will win business on our merits — not because we sought an unfair advantage. We must all be alert to bribery and corruption and every one of us is accountable for helping to stop it from happening.

Related Resources:

[Anti-Bribery Anti-Corruption Policy](#)

We Avoid Inappropriate Gifts and Entertainment

Although there may be times when gifts and business courtesies can be appropriate to build and foster relationships, we exercise good judgment at all times and comply with all regulations that apply to our highly regulated business, including all disclosure laws and anti-kickback statutes.

We only offer and accept gifts and entertainment when it is appropriate, does not violate any law or policy, and does not affect or appear to affect the judgment of anyone involved. In the U.S., when interacting with HCPs and others in a position to purchase, prescribe, or recommend our products, gifts and entertainment are not permitted.

Together, we must:

- Give and accept gifts — and offer and participate in business entertainment — only when it does not impact our ability to make decisions fairly and objectively and in strict compliance with Iveric's policies
- Avoid gifts and business entertainment that could be considered unlawful or would reflect poorly on the Company
- Be mindful of the rules that apply when interacting with government employees and HCPs
- Document all entertainment expenses clearly and accurately on expense reports

Focus In On ... Appropriate Gifts and Entertainment

What is permissible?

We may never accept gifts or entertainment that involve government officials or purchasers or prescribers of our products (HCPs).

Typically, it is appropriate to accept gifts and entertainment that:

- Are not high in value or extravagant (>\$150)
- Are not cash or a cash equivalent
- Are not offered with an expectation of any action by the recipient
- Are offered infrequently
- Do not violate the law

Be on the Look Out For ...

We have to use extra caution when giving or exchanging anything of value with individuals who create additional risk for the Company.

Healthcare Professionals

- Remember that additional legal requirements apply to our interactions with Healthcare Professionals.
- Never give any type of personal gift or entertainment to a Healthcare Professional.
- Make sure that any entertainment complies with company policy.

Government Officials

- Never offer or make payments or gifts directly or indirectly to any government official or employee to secure an improper advantage or to obtain, retain, or direct business to the Company.

The Big Picture

The public needs to trust us and those we associate with to be fair and objective in decision making. Our business practices help build that trust. We never want to give the appearance that our integrity is for sale.

Related Resources:

[Gifts and Entertainment Training](#)

[Travel Policy](#)

We Follow All Trade Controls

We respect the rights of governments to regulate the flow of goods, information, and services across national borders. We are committed to following all applicable laws and regulations governing international trade, including embargoes, sanctions, and export controls. At Iveric, we always comply with all trade controls.

Together, we must:

- Comply with all policies and laws that regulate the import and export of our therapies
- Work closely with the Legal Department to understand how trade restrictions and company policies apply to our activities
- Obtain all required licenses and approvals
- Accurately record all exporting and importing activities
- Immediately report any request to participate in a boycott

The Big Picture

Our reputation will often be judged by the company we keep. It's imperative that we work diligently and responsibly to be sure that all third parties with whom we work uphold our commitment to operating in compliance with applicable trade controls.

We see integrity ... in good professional judgment.

We Recognize and Disclose Conflicts of Interest

Conflicts of interest happen when personal interests conflict with, or appear to conflict with, what might be best for the Company. We make business decisions objectively, free from outside interests. Whether a conflict or potential conflict involves a financial interest, a family member or close acquaintance, or an outside activity, disclosure is required.

Together, we must:

- Understand how to recognize a conflict of interest and acknowledge that even the appearance of a conflict of interest should be disclosed in accordance with the Company's Conflicts of Interest policy as soon as possible
- Disclose interests, activities, and relationships that could compromise our ability to make the most fair and objective decision for Iveric
- Never take personal advantage of business opportunities learned about through the course of our work for Iveric

Focus In On ... Investment Interests

Be mindful where you or close family members invest.

Holding mutual funds or buying stock, such as in a retirement account, is typically not an issue.

But avoid significant or targeted financial investments in competitors and any company we do business with, including vendors or business partners.

When you invest, you have a stake in that company's profits — one that may conflict with your duties at our Company.

For example, what if an Iveric vendor you had invested in was underperforming? Normally, you might look to exit the contract, but if you or a family member could be harmed by the contract loss, you might hesitate.

Be on the Lookout For ... Types of Conflicts

Our Code cannot possibly list all of the different types of potential conflicts, but here is a list of interests and relationships that conflict with or appear to conflict with the Company.

- **Outside Employment/Consulting.** Never work for a competitor, in any capacity, without Board approval.
- **Improper Personal Benefits.** Don't use your role at Iveric or information that you learn while working for Iveric for personal gain.
- **Service on Boards and Committees.** Don't serve on the board of another organization if doing so would require you to make decisions that could impact Iveric.

- **Financial Interests.** You cannot have a financial interest in any company that is a material customer, supplier, or competitor of the Company (unless that interest represents less than one percent (1%) of the outstanding shares of a publicly held company).
- **Loans or Other Financial Transactions.** Do not enter into financial transactions with material customers, suppliers, or competitors of the Company. This guideline includes the acceptance of loans but does not prohibit arms-length transactions with banks, brokerage firms, or other financial institutions.
- **Actions of Family Members.** Disclose a relationship with a family member if it could impact your ability to be objective when making decisions for Iveric. For purposes of this Code, “family members” include your spouse or life partner, brothers, sisters, parents, grandparents, in-laws, and children — whether these relationships are by blood or adoption.

The Big Picture

Conflicts of interest create risk when the Company does not know about and cannot mitigate them. Even the appearance of a conflict of interest can be harmful to the Company. When we disclose our conflicts or potential conflicts, we enable Iveric to work to find resolutions that support us as individuals while also protecting the Company. This is why we ask employees to disclose their potential conflicts of interest on a regular basis and then we apply our value: *We look beyond “no” and ask “how”.*

Related Resources:

[Conflict of Interest Policy](#)

We Trade Securities Lawfully

Insider trading is unfair, and it’s also illegal. At Iveric, we are often aware of important information that has not yet been shared with the public. This can be information about Iveric (including information that may impact a competitor) or information about one of our vendors or business partners.

We are all responsible for complying with insider trading laws and for trading securities lawfully. This means we never trade in the securities of Iveric or any of our business partners or competitors if our decision to trade is based on inside information. And we never provide tips for anyone else to trade based on inside information or otherwise misappropriate such information.

Together, we must:

- Understand how to identify inside information
- Do not share any information that has not been made available to the general public — including to family members or close confidants
- Do not trade or tip on inside information about Iveric or any other company
- Contact the Chief Legal Officer with any questions about purchasing or selling company securities or the securities of another company before proceeding

Focus In On ... Inside Information

Inside information is also known as material nonpublic information (MNPI).

MNPI is:

- **Material** means it could affect the market value or trading of a security
- **Nonpublic** means it has not been publicly announced or otherwise made known to the general public

The Company has an obligation to share material information, but timing makes the difference of whether it is public or not public. Some examples of information include the following, if they have not yet been made public:

- Plans for a new therapy
- Clinical trial results
- Changes in the executive management team
- A new strategic direction for the Company
- The Company's financial results or quarterly earnings
- A cybersecurity breach

Be on the Look Out For ... Tipping

Providing nonpublic information to people who are not authorized to have it and who use it to trade to their advantage is called tipping. Tipping is illegal and can result in criminal charges.

The Big Picture

Insider trading is not only illegal, but it is also unfair — and not in line with how we operate as a Company.

We Engage Third Parties Responsibly

We choose to work with third parties who commit to the same standards and level of care that we do. We will not work with parties who are subject to government sanctions, have a history of misconduct, or are otherwise unable to comply with legal or industry standards. We treat all business partners with whom we work fairly and with the same level of trust and respect that we show to each other.

Together, we must:

- Work with third parties who have a reputation for integrity
- Comply with all due diligence policies and procedures when choosing and managing relationships with third parties
- Understand applicable trade compliance regulations and never conduct business with sanctioned parties
- Protect the proprietary and personal data of our suppliers and business partners and expect that same protection from them
- Never accept favors from third parties who are seeking to engage with us

Focus In On ... Due Diligence

When we engage with third parties, we have a responsibility to follow Iveric's due diligence processes and procedures. This is critical to establishing and maintaining relationships with business partners whom we can trust and who share our reputation for integrity. Our due diligence processes include:

- Screening all third parties as required and contract appropriately
- Conducting thorough follow-ups during working relationships to confirm that all third parties understand and agree to our expectations
- Following proper re-vetting procedures as required

The Big Picture

We can be responsible for the actions of anyone acting on behalf of the Company. It is important to know our partners well and look out for any potential warning signs of wrongdoing.

We see integrity ... in the protection of our assets.

We Comply With Data Privacy Laws

At Iveric, we are subject to extensive laws and regulations, both inside and outside of the United States, that govern the collection, use, disclosure, storage, and transmission of personally identifiable information (PII) and especially information about patients (Protected Health Information or PHI). Every day there is the potential to encounter PII that is entrusted to us by clinical trial subjects, patients, investigators, employees, consultants, suppliers, and other business partners.

We are committed to protecting the privacy and data integrity of all PII that comes into our possession. We are all responsible for complying with the Company's applicable policies and procedures with respect to the collection, use, disclosure, storage, transmission, and deletion of PII.

Together, we must:

- Use PII only with permission and in accordance with Iveric policies and procedures — and only if it is necessary as a part of our jobs
- Protect PII and PHI at all times and never share it with someone who is not authorized to view it
- Speak up immediately if concerned that PII or PHI has been misused or misplaced

A Closer Look ... PII

PII is any information that can be used to identify an individual. Some examples include:

- Names
- Contact information
- Personnel records
- Medical records
- IP addresses and mobile device identifiers

Be on the Lookout For ... Privacy Breaches

Privacy breaches happen all the time, and more likely than not, they happen by accident.

For example, if you receive an email with PHI and forward it to others in the Company, that is a privacy breach. PHI should not be sent via email, and you should never forward PHI to additional people who don't have the right to review it. Instead, report the email to IT and the Compliance Officer immediately in a separate communication.

Contact the Compliance Officer or the Legal Department immediately if you:

- Accidentally disclose PII to an unauthorized person or entity
- Learn or suspect that PII has been breached or have concerns that PII could be breached

The Big Picture

Protecting PII strengthens our relationships with patients, contributes to a workplace of trust and respect, and is simply the right thing to do.

Related Resources:

[Privacy Policy](#)

We Protect Our Assets and Information

We are all responsible for safeguarding our physical, informational, and financial assets and protecting them from theft or misuse. Our assets enable us to achieve our mission and succeed in an innovation-driven industry.

Together, we must:

- Protect company property, including all laptops, tablets, or other devices where company information is stored, at all times
- Always act responsibly when using company assets, including when incurring expenses on behalf of the Company
- Keep confidential information safe and away from public view and share it only with those who are bound to confidentiality obligations and need to review it to advance Iveric's business objectives
- Protect the confidential information not only of our Company, but of any third party with whom we work
- Use proprietary information only for company business and not for personal purposes

Focus In On ... Proprietary Information

Proprietary Information includes all information and know-how, whether or not in writing, of a private, secret, or confidential nature concerning the Company's business or financial affairs. Proprietary information is the exclusive property of the Company. Here are some examples:

- Discoveries and inventions
- Products, product improvements and enhancements, and product development plans
- Research, clinical, and other scientific data and analyses
- Processes, methods, techniques, formulas, compositions, and compounds
- Negotiation strategies and positions
- Computer databases and programs (including software used pursuant to a license agreement)
- Lists and records of employees, investigators, clinical trial sites, customers, prospects, business partners, vendors, and other suppliers

Be on the Lookout For: Using Our Systems Responsibly

Iveric's IT systems include our computers, phones, software, email, intranet, and the internet.

- Remember that Iveric's communication systems belong to the Company and are for the purpose of carrying out the Company's work.
- Remember to limit any personal use of our IT systems — never allowing it to interfere with work responsibilities and or be connected to an outside business.
- Understand that our written and electronic Iveric communications, as well as our IT systems, are company assets, and the Company has the right to monitor them. As such, there is no guarantee that any personal use or communications of Iveric's technology may not be seen or discovered through Iveric's monitoring.
- Safeguard your user accounts and passwords and do not share them with others.
- Never use Iveric's IT systems to send, receive, or access electronic information that could be seen as illegal, sexually explicit, harassing, or offensive, or otherwise reflect poorly on the Company.
- Install software only if it has been licensed and approved by Iveric.

The Big Picture

When our Company succeeds, we all succeed — as employees, as patients, and as members of the community. Treating company assets responsibility is critical to our collective success.

Related Resources:
[Employee Handbook](#)

We Safeguard Our Intellectual Property

Innovation leads the development of our therapies. Our intellectual property (IP) is one of the most valuable assets owned by Iveric and is a key driver in achieving our mission. We are all responsible for protecting it.

Together, we must:

- Understand that every employee has the potential to produce intellectual property — and must be aware of how and when to protect it
- Document work carefully so that we can properly safeguard intellectual property
- Keep in mind that any intellectual property created while working for Iveric belongs to the Company
- Protect any intellectual property licensed or copyrighted from others with the same care extended to company-developed intellectual property
- Report any concerns about IP being at risk and/or any concerns about the use of third-party intellectual property

Focus In On ... What Is Intellectual Property?

Intellectual property includes works or inventions such as patents, trademarks, trade secrets, and copyrights. Companies have many different ways to protect intellectual property rights.

Be on the Lookout For ...

If you create or invent something in the course of doing your job, it is important that you understand and help Iveric take the required steps to protect the intellectual property that results from your work. These steps require you to seek guidance from the Legal Department when creating work that may contain intellectual property.

The Big Picture

Protecting our intellectual property is critical to our Company and to our competitive advantage. It enables Iveric to be a leader in its field.

We see integrity ... in how we comply with industry regulations and standards.

We Prioritize Our Patients

At Iveric, *we see patients as people*. We appreciate that individuals who participate in clinical trials contribute invaluablely to the advancement of medicine. The safety of patients receiving our therapies, including those participating in our clinical trials, is paramount. We are committed to conducting our operations in accordance with all applicable laws and regulations as well as recognized guidelines such as Good Laboratory Practices, Good Clinical Practices, Good Pharmacovigilance Practices, and Good Manufacturing Practices.

Together, we must:

- Follow all applicable procedures for obtaining informed consent from study participants
- Train clinical investigators and their staffs on applicable study protocols, the procedures involved, and Good Clinical Practice record-keeping requirements
- Audit and monitor clinical study sites and processes related to our clinical trials
- Speak up and take appropriate action about any concerns affecting the safety of our clinical participants

Focus In On: Interactions With Patients

If you have the opportunity to meet and interact with patients, keep in mind that that your interactions are a reflection of Iveric. We must keep all interactions respectful, transparent, and professional.

When you interact with patients:

- Always respect patient privacy. Never ask questions about their health or their treatment.
- Once a product is approved, only provide PRC-approved materials to patients. Do not provide medical advice.

The Big Picture:

When we design and conduct clinical trials in accordance with recognized ethical standards and procedures, we protect the integrity of our Company's research and development process. This enables us to move our products forward safely and with respect for our prospective patients.

We Manufacture and Distribute Safe and High-Quality Products

We are committed to manufacturing our product candidates in a manner that meets all required quality requirements and specifications. We oversee the cGMP manufacturing processes, analytical testing and quality control, and supply chains for our product candidates and require compliance by our suppliers

and distributors with all applicable laws and regulations to ensure product safety, identity, quality, purity, and strength.

We strive to work only with reputable third-party manufacturers whose records reflect a commitment to applicable regulatory requirements, quality standards, and Good Manufacturing Practices. We comply with all federal, state, and local regulations governing pharmaceutical importation, export, and distribution including, as appropriate, the Drug Supply Chain Security Act.

Together, we must:

- Comply with all policies, procedures, and controls designed to protect the quality of our products
- Be aware of any approved specifications and required quality standards that apply to our products
- Be attentive to product quality complaints, such as damaged packaging or product contamination
- Report any concerns about a product's quality or safety

Focus In On: Reporting Safety Concerns

We must know how to recognize and report an adverse event, complaint, or concern about a product.

Adverse Events:

An adverse event (AE) can happen when someone has an undesirable experience with one of our therapies. It is important that we pay close attention when someone describes an experience with our products. Let's say you are speaking with a neighbor who shares that since taking a product, they have been experiencing headaches. What should you do?

- Listen carefully when someone describes an experience with our product.
- Ask if they reported the issue to their doctor.
- Notify Iveric Drug Safety no later than 24 hours after the first awareness of the event; even if unsure that the event qualifies as an AE.
- Send the information to Iveric Drug Safety via one of the following methods:
 - Email: drugsafety@ivericbio.com
 - Fax: 917-591-7377
 - Phone: 844-356-3179

Product Complaints:

Product complaints are any inquiry or dissatisfaction with the safety, identity, strength, quality, or purity of a released drug product or medical device.

The Big Picture

The future of our progress and our ability to secure approval of our products for use in patients depends largely on our commitment to documenting and reporting product issues.

Related Resources:

[Adverse Event Awareness and Reporting Policy](#)

We Interact With Healthcare Professionals (HCPs) Appropriately

At Iveric, we work professionally and ethically with HCPs and comply with the rules and regulations that apply to our interactions with them. We choose to work with HCPs whom we trust to operate with the best interest of the patient in mind, and we never use financial incentives to influence their decisions.

Together, we must:

- Know the rules and regulations that apply to our interactions with HCPs and always comply with them
- Communicate with HCPs to share complete and accurate information about our products, and appropriate information on programs that support appropriate patient access to our products, in accordance with the rules pertaining to your role within the Company
- Be sure that all our interactions with HCPs are for a legitimate business purpose
- Provide ONLY thorough, accurate, and balanced information about our products and programs that has been approved by the appropriate internal review committee
- Respect HCPs' professional judgment and never attempt to interfere with any prescribing and/or purchasing decisions
- Appropriately record and disclose all transfers of value to HCPs and other reportable healthcare entities to comply with transparency laws and regulations

Focus In On ... Who is an HCP?

HCPs include physicians, nurses, hospital and medical office staff, and anyone else involved in prescribing, administering, purchasing, or recommending our products.

Be on the Lookout For: Collaborating With HCP's

It's important for us to build ethical relationships with HCPs.

Our focus when interacting with practitioners is to:

- Once approved, inform them about the benefits and risks of our products to support appropriate use
- Inform them of programs and service that support patient access to our products
- Provide scientific and educational information

- Support medical research and education
- Get feedback about our products

The Big Picture

Patients need to know that HCPs use our products based on their therapeutic value to patients and never because of some personal benefit they might receive for doing so. We build this trust when we establish clear and professional relationships with HCPs in compliance with all applicable regulations.

Related Resources:

[Interactions With HCPs Policy](#)

We Promote Our Products and Programs Compliantly

We take pride not only in our therapies and the way they help patients, but also in the ethical way that we bring them to market. Our patients and the broader healthcare community trust us to describe our treatments thoroughly and accurately so that they can be used in the most safe and effective way.

Iveric creates marketing and education materials that promote our treatments by informing patients and the healthcare community in a way that is consistent with our commitment to integrity, compliant with all legal requirements, and never misleading. We discuss our therapies based on patient need and in a balanced, transparent manner, established by medical and scientific facts.

Together, we must:

- Distribute promotional materials only if they are approved by the Promotional Materials Review committee (PRC)
- Understand how the laws regulating product promotion apply to our roles and seek guidance if we have any questions
- Always describe our treatments truthfully and accurately and balanced with risk and benefit information
- Never promote a product or indication that has not yet been approved by the appropriate regulatory authorities

Focus In On: Off-Label Promotion

Once therapies receive regulatory approval or clearance, we may promote them as safe and effective for their intended use. Uses that are not specifically approved are known as off-label uses — and we can't promote them. If you get an off-label question, refer that person to our Medical Information Team.

Be on the Lookout For ... Promotional Materials

Any communications or promotional materials about our therapies must:

- Stick to the facts and the science
- Be consistent with their labeled intent

- Be truthful, never misleading, and contain safety information
- Never make unfair comments about competitors' products
- Always comply with Iveric's policies and procedures

The Big Picture

Promoting our products fairly is paramount to our reputation.

Related Resources:

[Product Promotion Policy](#)

[Promotional Review Committee SOP](#)

We see integrity ... in our commitment to transparency in our business and operations.

We Communicate Responsibly

At Iveric, it is important that our communications align with our business strategy and reflect our Company's mission, vision, aspiration, and values. Specifically, we are responsible for communicating corporate, scientific, and product information in a way that is fair, complete, and accurate. Because we are committed to communicating clearly, Iveric has authorized only specific individuals to speak on behalf of the Company.

Together, we must:

- Avoid speaking on behalf of the Company unless you are specifically authorized to do so
- Act professionally and use good judgment in all communications, including posts or comments on social media
- Be clear that your views are not the views of the Company
- Use social media for business purposes only as approved by the Company

A Closer Look ... Social Media

Some additional guidelines to remember when using social media:

- You may repost company approved postings, with a brief comment, but you may not add any additional information or content.
 - Examples of appropriate comments with a re-post: "My company advances science" or "So proud to work here."
 - Examples of inappropriate comments with a re-post: "Our product treats _____" or "These data prove that patients have hope in sight when taking our product." Even if your comments are accurate and/or do not name our product, these types of comments are promotional, unbalanced, unapproved, and impermissible.
- Make sure that personal use of social media does not interfere with work activities.
- Understand that what you post on your personal social media platforms can impact the Company.

- Review the Social Media Policy and consult your manager, Corporate Communications, or the Compliance department if you have any questions about what is appropriate to post.

The Big Picture

Our reputation as a trusted Company enables us to deliver on our mission — and we always want to build and preserve that trust. By communicating clearly with our stakeholders, we earn the trust and respect we need to carry out our business effectively and without negative social media concerns.

Related Resources:

[Social Media Policy](#)

[Disclosure Policy](#)

We Provide Transparency in Our Financial Processes and Results

The law requires us to report our finances and certain other information, including payments to HCPs, in a full, fair, accurate, timely, and understandable manner. We comply with all applicable reporting requirements. By demonstrating integrity in our financial reporting, we not only meet our legal obligations, but we also hold ourselves accountable to those who depend on our transparency.

Together, we must:

- Record or report all work-related information in a timely, clear, accurate, and complete way
- Never falsify a record, conceal the truth, or state something that you know is not true
- Contact the Chief Financial Officer with any concerns that a financial entry may be inaccurate, incomplete, or misleading

Dealings With Independent Auditors

It is important that we deal honestly and impartially with our independent auditors. No employee, officer, or director may, directly or indirectly, make or cause to be made a materially false or misleading statement (or omit to state, or cause another person to omit to state, any material fact necessary in order to make statements made, in light of the circumstances under which such statements were made, not misleading) to an accountant in connection with an audit or review of the Company's financial statements or the preparation or filing of any document or report with the SEC. No employee, officer, or director may, directly or indirectly, take any action to coerce, manipulate, mislead, or fraudulently influence any independent public or certified public accountant engaged in the performance of an audit or review of the Company's financial statements.

Focus In On: Internal Controls

Iveric has internal controls in place to assist in our compliance with regulatory requirements. It is important that we:

- Never attempt to bypass the internal controls and procedures we have in place (or ask someone to bypass them) even if you think it would save time without creating harm
- Cooperate with any investigations undertaken by internal or external auditors and be clear, forthcoming, and truthful in any discussions you have with them

Be on the Lookout For ... Signs of a Potential Reporting Issue

Some signs that there could be an issue with financial integrity include:

- Financial results that don't make sense in the bigger picture of the business
- Transactions that do not seem to have a clear business purpose
- Requests to circumvent standard review and approval processes

The Big Picture

Our transparency with financial information builds trust and impacts whether external stakeholders will support our mission and our work. This is incredibly important as we continue to develop and expand our products.

Related Resources:

[Financial Control Policies](#)

We Practice Good Records Management

We create and manage many records and documents while at work — including data about our products and patients, as well as correspondence with one another in the form of emails, voicemails, or even text messages. We are all responsible for managing company records efficiently and in accordance with our policies and applicable laws and regulations.

Together, we must:

- Be accurate, complete, and timely whenever creating records at work
- Support all business transactions with the appropriate documentation
- Communicate professionally at all times, whether orally or in writing
- Retain records in accordance with Iveric's record retention policies and procedures
- Cooperate with legal holds or other company requests to keep records for longer than the time specified by any applicable records retention schedule

Focus In On: Types of Records

There are many different types of records, including:

- Research results
- Laboratory reports and notebooks

- Development reports and protocols
- Manufacturing records
- Testing protocols, records, and reports
- Contracts
- Expense reports
- Financial reports
- Marketing strategies
- Reports for regulatory agencies
- Invention disclosure forms
- Personnel files

Be on the Lookout For ... Accurate Records

We are all responsible for creating records that create an accurate picture of the facts. This includes not only being truthful in the information we share, but also making sure our records are complete and not misleading. For example, failing to include unfavorable clinical data in a regulatory filing is an example of creating a false record.

The Big Picture

In addition to complying with legal requirements, our records enable us to do many important things — including strategic planning and monitoring the performance of our products. Protecting records is critical to our successful business operations.

Related Resources:

[Good Documentation Policy](#)

We see integrity ... in the way we treat one another and our surroundings.

We Respect Each Other and Promote a Diverse, Equitable, and Inclusive Workplace

When we respect each other, we work better as a team, building a work environment of which we can all be proud. At Iveric, we treat each other with respect and consideration. Our Company will never tolerate harassment, bullying, intimidation, or discrimination.

We also acknowledge and honor the fundamental value and dignity of all individuals. As a Company, we are committed to an inclusive workplace that embraces cross-cultural diversity, anti-racism, fair and equitable treatment, and respect for everyone. Our Company is strongest when we embrace the full spectrum of humanity, regardless of what we look like, where we come from, or who we are.

Together, we must:

- Treat each other with respect at all times
- Act professionally and courteously and never engage in inappropriate jokes or discussions
- Make employment-related decisions based on an individual's qualifications and experience and not on characteristics such as race, gender, gender identity, disability, age, or other protected characteristics
- Appreciate that different backgrounds, opinions, and experiences make us a stronger Company
- Act inclusively towards others and never intentionally exclude others from ordinary workplace interactions or conversations
- Speak up if feeling mistreated or concerned that someone else might feel mistreated

Focus In On ... Harassment and Discrimination

Harassment and discrimination are unlawful behaviors that lead to a toxic work environment.

Harassment includes unwanted contact (verbal or physical) that is based on characteristics protected by the law. Harassment comes in many forms and is not limited to contact that is sexual in nature.

- It can involve a wide range of behavior — including comments, jokes, images, or other interactions that denigrate or show hostility or aversion toward a person or group because of a legally protected characteristic.
- It can happen almost anywhere — including over email or through unwanted physical contact.
- Bullying and intimidation are also forms of harassment that we do not tolerate at Iveric.

Discrimination involves treating someone differently or unfairly based on certain legally protected characteristics, including those described above — for example, deciding not to promote someone because they are above a certain age.

Be on the Lookout For ...

Keep in mind that we prohibit actions that could be considered harassment, even if the actions are intended as a joke. Remember that what you find acceptable or funny may be offensive to others.

The Big Picture

At Iveric, our values remind us that *every person matters*. Our people are our Company's greatest asset, enabling us to prioritize the discovery, development, and, if approved, commercialization of therapies for retinal diseases with significant unmet medical needs. When we respect each other and work together to prioritize inclusivity and diversity, we recruit and retain better talent, we foster employee engagement, and we create an environment that is ripe for innovation and success.

Related Resources:

[Non-Discrimination and Anti-Harassment Policy](#)

We Create and Maintain a Safe and Healthy Workplace

A safe and healthy workplace must be a priority for all of us. Whether we are working from an Iveric office or our home office, we have policies and procedures in place to comply with health, safety, and environmental requirements promoting a safe and healthy workplace.

Together, we must:

- Work free from the influence of alcohol or drugs that have not been safely prescribed, wherever you perform work for Iveric
- In company facilities, comply with all building security procedures at all times, such as wearing badges and keeping office doors locked where required
- Immediately report any safety concerns or suspicious activity

Focus In On: Responsible Use of Alcohol

Iveric may authorize the consumption of alcoholic beverages during a business-related social activity, or you may attend a business meeting or conference on behalf of Iveric where alcohol is served. You are never required to drink alcohol at these events. If you do choose to consume alcohol, always use good judgment and consume in moderation. Remember that even at off-site events, you are still a representative of the Company.

The Big Picture

By keeping safety top of mind, we create an environment where everyone feels protected when coming to work. And a safe work environment enables us to keep doing the hard work necessary to achieve our mission.

Related Resources:

[Employee Handbook](#)

We Care About the Environment and Our Surrounding Communities

Our Board of Directors has set high standards for our Company. The commitment we make to each other and to our patients also extends to the communities we serve. This includes our commitment to identifying gaps and researching uncharted territory, adapting our mission to fit the needs of the community.

Together, we must:

- Prioritize human rights and choose to work with business partners who share this commitment
- Minimize, reuse, and recycle waste at our facilities whenever possible to promote sustainability and care for our environment
- Respect fair labor laws, including wage and hour laws and prohibitions against forced, trafficked, or child labor
- Support compassionate access to products for those who need it most

Don't Forget ...

Our vision for integrity depends on all of us coming together to conduct business ethically every step of the way. We are counting on you to read this Code, ask questions about it, and speak up whenever you have concerns. Your voice will be heard.

Every person matters and every person's voice must be heard. Use yours — speak up.

Talk to any one of these Resources:

- Your Supervisor
- Human Resources
- The Compliance Officer
- The Helpline

There is a strict NO RETALIATION POLICY for raising good faith concerns.

Report Concerns. Ask Questions. Call the Helpline. It's confidential and you can remain anonymous.

Mobile: ivericbiomobile.ethicspoint.com

Online: ivericbio.ethicspoint.com

Phone: 833-416-6268

Code Administration

This Code, as applied to the Company's principal financial officer, shall be our "code of ethics" within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder.

Training

When employees, officers, and directors join Iveric, they will be given access to this Code via training. They can also access the Code electronically on the Company's website. Employees, officers, and directors will participate in Code training annually.

As part of the annual training, employees, officers, and directors will be asked to certify to the Code and attest that they have received it, have accessed it, and understand it. They will also be asked to attest that they will comply with it and adhere to its terms, including understanding that failure to do so may result in discipline up to and including termination.

Waiver

Any executive officer or director who seeks a waiver of any of these policies should contact the Chief Compliance Officer or the Chief Legal Officer. Any waiver of this Code for executive officers or directors or any change to this Code that applies to executive officers or directors may be made only by the Board of Directors of the Company and will be disclosed as required by law or stock exchange regulation.