



Integrity – It's in our Code





A Message from our CEO

Welcome to Blueprint's Code of Business Conduct and Ethics—a representation of our commitment to doing the right thing for patients, each other and the communities where we live and work.

Every day, we commit to deliver on Blueprint's Mission—to make real the promise of precision therapy to improve and extend life for as many people with cancer and hematologic disorders as possible. We take great pride in what we do for patients, but this work comes with responsibility. How we do this work is incredibly important. Our Code of Business Conduct and Ethics is an extension of our Mission and articulates how we live by our Core Values in the day-to-day of our work.

As a company, and as individuals, we carry a responsibility to always act ethically and lead with integrity. The responsibility doesn't just mean doing the right thing—it's doing the right thing even when it's not easy. As we strive to bring our transformative therapies to patients in need, strengthen our communities and support one another, we will inevitably face adversities and decisions that feel challenging. Our Code of Business Conduct and Ethics and the support we find in each other can help guide us during challenging times.

We recognize that making good on our commitment to lead with integrity is a journey that requires sustained effort from each and every Blue Crew member. I invite you to explore our Code of Business Conduct and Ethics, reflect on what it means to be part of the Blue Crew and importantly, *live it*. If you see or feel something that isn't right, say something.

I am so proud to be part of the Blue Crew and know that the impact of our collective actions will be the profound difference we have on this world.

A handwritten signature in black ink, appearing to read 'Kate Haviland'.

Kate Haviland
Chief Executive Officer

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Integrity – It's in our Code

We live our Code every day

Integrity means being honest and doing the right thing, regardless of who is watching, even when it isn't easy. At Blueprint,* our Mission, Core Values and commitment to acting with integrity are fundamental to living our Code of Business Conduct and Ethics (our "Code").

We are each responsible for following our Code and company policies to help Blueprint make good on our Mission. This includes all "Blue Crew":

- Employees
- Contractors, including interns and fellows
- Directors and executive officers



* References to "Blueprint" include Blueprint Medicines Corporation and its subsidiaries.

Our Mission

We are working to make real the promise of precision therapy to improve and extend life for as many people with cancer and blood disorders as possible.

Our Core Values

We strive to uphold our Core Values every day.



Patients First

We maintain intense focus on improving patients' lives.



Thoughtfulness

We explore creative approaches, daring to make well-thought-out decisions and owning the outcomes.



Urgency

We solve complex problems rapidly, with attention and care.



Trust

Through collaboration and cooperation, we build and maintain a cohesive team that has mutual respect of different viewpoints and talents.



Optimism

We pursue transformative therapies that we believe will make a difference.

Making the right decision

Our Code cannot address every situation we may face in our work. There will be times when the right choice is not so obvious and something that may be legal may not necessarily be viewed as ethical. If you are facing a difficult decision, consider the following questions to guide your decision-making.

**Is it legal?
Does it follow our policies
and the law?**

**Would you feel
comfortable if it
was made public?**

01

**Is it Ethical?
Does it follow our
Core Values and Code?**

02

03

**Would it show that our
company is committed to
doing the right thing?**

04

If your answer is “yes” to each question, then it is probably the right decision to make. But if you are still in doubt, don’t hesitate to ask for help. If your answer to any question is “no” or “I’m not sure,” seek guidance. One of the purposes of the Code is to help you understand when to ask for or seek clarity and, most importantly, to help you feel comfortable doing so.



We respect and trust one another

We create a healthy culture by promoting respect and safety in our workplace

We nurture a healthy culture by prioritizing our own and each other's health, safety and overall wellness and by cultivating a work environment where each of us feels respected, included and empowered.

We do what's right

A healthy culture begins with an empowered community—one where everyone feels a sense of trust and safety. We create that community by encouraging diverse opinions and considering each other's well-being, perspectives, feelings and physical and psychological safety. We work together to provide a safe and healthy workplace.

At Blueprint, we know that we're more than employees—we're part of the Blue Crew!



We live our values

- We always treat one another with respect, professionalism and compassion.
- We seek out diverse perspectives and welcome healthy debate and conflict.
- We avoid saying or doing things that others might find offensive or degrading.
- We speak up if we feel our views or those of others are being disrespected.
- We provide fair, safe and appropriate working conditions, hours and compensation to everyone in the Blue Crew.
- We follow our health, safety and environmental trainings, protocols and policies.
- We never engage in violence whether physical, verbal or psychological.
- We have zero tolerance for discrimination, harassment or retaliation.
- We do not consume or carry illegal substances in the workplace. We are never impaired when carrying out our work duties.
- We do not bring weapons or other dangerous substances or devices onto Blueprint property.
- If you are a manager, you should use our BLUEFlex program to optimize culture, productivity and flexibility by maximizing the critical strengths of in-person work with the benefits of added flexibility.

At Blueprint, we are intentional in creating a healthy culture and we offer programs to support that objective.

Our Work Well Program

If we don't take care of ourselves, we can't ultimately do the work that serves patients. We believe that our well-being is critically important for ourselves, for those around us and for our work. Our Work Well Program helps us do this in a way where we can find harmony between our work and personal lives.

Environmental, Health and Safety (EHS) Committee

The EHS Committee provides resources to promote health and safety to the Blue Crew. If we ever have concerns that a particular practice may be unsafe, we can discuss those concerns with the EHS Committee.

Equity, Diversity and Inclusion (ED&I) Committee

The ED&I Committee involves a significant portion of our global workforce, including members of our Executive Team, reflecting the deep commitment of our employees and management. This group serves to ideate and action ED&I initiatives across the company, including culture, workforce and external activities, as well as advise executive and functional leadership.



What does ED&I mean to us?

- **Equity** starts with treating each other with fairness and equality. It also means acknowledging inequities and looking for ways to address specific needs and adjust imbalances.
- **Diversity** means embracing the differences between us, including all of our unique characteristics, such as race, sexual orientation, gender identity, age and ability.
- **Inclusion** means that everyone feels welcome no matter who they are or where they come from.
- **Belonging** means that we feel accepted, supported and safe, in our team.



Question & Answer

Q:

One of my coworkers showed our team posters with derogatory language about individuals with disabilities. It made me uncomfortable, but no one else has spoken up about it. What should I do?

A:

This type of behavior violates our policies on harassment and discrimination and does not represent the Blueprint culture. You should talk to your coworker, if you feel comfortable, and if not, notify your manager, HR, Legal or Compliance.



We speak up and take action

We are responsible for proactively asking questions when we need guidance and speaking up when we see or suspect violations of the Code. We own this responsibility together.

We do what's right

This Code represents our commitment to our Mission, Core Values and integrity in action. It can be intimidating to voice concerns, particularly when those concerns could impact a fellow Blue Crew peer or manager. However, at Blueprint, we want you to feel empowered, not fearful, to speak up. We have a "Zero Tolerance for Retaliation" policy. Your concern will be treated confidentially and with respect. We respect each other for coming forward and recognize the value of being engaged, observant and invested in doing the right thing.

Zero tolerance for retaliation

Blueprint does not tolerate retaliation in any form against any Blue Crew who report suspected misconduct or participate in an investigation in good faith. Any person who retaliates is subject to disciplinary action, including termination. Examples of retaliation include:

- Harassment or discrimination
- Discharge or suspension
- Demotion or reduced hours
- Threats or bullying



When you have a question or need to voice a concern, you can reach out to:

1. **Your manager.** Managers may be the easiest place to start because they know us and are most familiar with our team members. You can also talk with another supervisor or function leader.
2. **A support partner.** If the question involves your manager, or if you do not feel comfortable speaking with your manager, you can speak to a Legal, Compliance, Human Resources or Finance partner.
3. **BlueCares.** We recognize that some members of the Blue Crew may feel more comfortable reporting a suspected violation anonymously. Reports made to BlueCares may be made anonymously in the U.S. and elsewhere as legally permitted. To make a report, you can:

a. Call our BlueCares Hotline:

- United States: 1-844-857-5642
- France: +33 (0)-800-99-0011*
- France/Paris Only: +33 (0)-800-99-0111*
- Germany: +49 (0)-800-225-5288*
- Spain: +34 (0)-900-99-011*
- Italy: +39 (0)-800-172-444*
- Switzerland: +41 (0)-800-89-0111*
- Netherlands: +31 (0)-800-022-9111*
- UK: +44 (0)-800-89-0011*



*You will be requested to prompt the following number: 844-857-5642

b. Visit our BlueCares Hotline website:

<http://blueprintmedicines.ethicspoint.com>

The BlueCares Hotline is available 24 hours a day, 7 days a week for both U.S. and International Blue Crew and is hosted by an independent, third party vendor. It is safe, secure and confidential—however it should be noted that while a reporter's identity cannot be determined by submitting a report, we cannot guarantee confidentiality or anonymity as the nature of the report details may reveal the identities of those involved.

We speak up and take action (*continued*)

Blueprint investigates all reports of potential violations of this Code, policies or applicable laws and regulations. All Blue Crew are expected to cooperate with investigations when asked. You may remain anonymous if you wish, and Blueprint will use reasonable efforts to protect your confidentiality. However, if the report is made anonymously, Blueprint may not have sufficient information to investigate or evaluate the allegations. If you make an anonymous report, please provide as much detail as necessary to ensure a full investigation.

A manager or support partner who becomes aware of a compliance concern, has a responsibility to promptly bring it to the attention of the Legal & Compliance department. This ensures that potential compliance issues are appropriately addressed and resolved in a timely manner.

Manager's responsibilities

Managers have special responsibilities to guide and mentor their team on how to live the Code. These include:

- Lead by example and model high standards of ethical business conduct through their words, behaviors and decisions.
- Create an environment of mutual respect and open communication where Blue Crew feel comfortable raising concerns.
- Encourage a “speak up” culture.
- Ensure that the Blue Crew reads and understands our Code.
- Regularly reinforce the importance of understanding and following the Code.
- Be a resource for questions or advice about how the Code and other Blueprint policies apply to daily job responsibilities.
- Take ALL concerns seriously. Listen carefully and take prompt action when someone makes a report.



Question & Answer

Q: I recently learned that a colleague engaged in an activity that I believe could damage Blueprint's reputation. Do I have to report this?

A: Non-compliance with our Code and policies could have serious consequences for our company, colleagues, partners, investors and patients. We all have a duty to report things that have the potential to compromise our integrity and/or damage Blueprint's reputation. These can include:

- Non-compliance with internal policies
- Unlawful discrimination
- Harassment
- Workplace violence
- Conflicts of interest
- Falsification of documents
- Inappropriate gifts and entertainment
- Inappropriate political activities and contributions
- Insider trading or other securities law violations
- Bribes, kickbacks and/or corruption activities
- Accounting, internal accounting control, auditing or securities law matters



We uphold industry standards

We follow healthcare laws

Our relationships with healthcare professionals (HCPs), healthcare organizations (HCOs) and patient advocacy groups (PAGs) are instrumental to serving patients and are built on a foundation of trust and integrity. We foster this trust by following all healthcare laws.

We do what's right

There are many healthcare laws, regulations and industry standards that apply to our business. We recognize that a violation of any of these can have serious consequences and can erode trust in Blueprint—trust that is critical to our Mission of impacting patients' lives. We are committed to abiding by all healthcare laws and regulations guiding our business.

We live our values

- We know and follow the laws and regulations that govern our interactions with Customers.
- We never offer or give anything of value to influence or reward prescribing, using, purchasing, leasing or recommending our products or services.
- We communicate in a truthful, informative and objective way.
- We respect the independent judgment of Customers.
- We offer modest and occasional meals and travel only when needed to support a legitimate business purpose.
- We document business activities and expenses involving Customers accurately and completely.
- We never interfere with the medical judgment of HCPs or their relationships with their patients.



Who are our Customers?

When we refer to “Customers” throughout the Code, we are talking about individuals who may purchase, sell, prescribe or recommend our products. This includes:

- Healthcare professionals (HCPs)
- Healthcare organizations (HCOs)
- Patient advocacy groups (PAGs)
- HCP, HCO and PAG representatives
- Patients
- Caregivers
- Payors



Who is an HCP?

An **HCP** is any professional who may influence the use, purchase, prescription or recommendation of Blueprint products. HCPs include, but are not limited to:

- Physicians, nurses and nurse practitioners
- Pathologists
- Physician assistants
- Pharmacists
- Medical directors
- Lab directors
- Social workers
- Residents and medical students
- Employees, contractors and agents of these individuals



What are HCOs and PAGs?



An **HCO** is any organization that provides healthcare to patients, conducts clinical research, or that otherwise may use, dispense, purchase, prescribe, recommend, reimburse and/or establish pricing of Blueprint products. HCOs include, but are not limited to:

- Hospitals
- Clinics
- Nursing facilities
- Pharmacies
- Wholesalers and distributors
- Health insurers, pharmacy benefits managers (PBMs), managed care entities
- Integrated delivery networks (IDNs)
- Group purchasing organizations (GPOs)
- Universities
- Disease-specific or professional foundations
- Businesses whose entire members, entire shareholders, or all employees include HCPs, e.g., a consulting firm

A **PAG** is an independent not-for-profit organization that has the goal of:

- Providing support to patients and caregivers or
- Advocating for—among other things—research, patients' rights to access and/or treatment choice, disease awareness and patient information in one or more therapeutic areas.

? Question & Answer

Q: A doctor I am working with is interested in becoming a speaker in our speaker bureau. He said he would prescribe more Blueprint products for patients if he speaks on Blueprint's behalf. Would this arrangement be allowed?

A: No. This HCP appears to be asking for a kickback by providing or offering to provide something of value—increased prescriptions—in exchange for paid speaking engagements. Not only could this be illegal, but entering into this kind of arrangement would also interfere with the doctor's objectivity and relationship with his patients. Consult with your manager, Legal or Compliance on how to proceed.



We prohibit bribery and corruption

Committing to doing what's right, not what's easy, means we do business the right way and do not tolerate corruption or bribery.

We do what's right

We never engage in bribery and follow all anti-corruption laws. We expect our third-party partners and suppliers to comply with appropriate laws and regulations. We must strive to avoid even the appearance of corruption.

We live our values

- We never offer, authorize or give anything of value to gain an improper advantage or with the intent to influence someone's objectivity.
 - We watch for "red flags" such as unusual payments, discounts or commissions.
 - We follow applicable anti-bribery and anti-corruption (ABAC) laws and regulations in the countries where we do business, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and the U.S. Federal Anti-Kickback Statute.
 - We remember and consult Blueprint's Compliance policies when interacting with Public Officials and Customers, such as HCPs, HCOs, patients and PAGs. We ask local experts for support when we are not clear on country-specific regulations.
 - We engage Customers for legitimate business purposes and at fair market value.
- We give clear expectations to our third parties about their responsibilities and monitor them to ensure they continue to meet our expectations.
 - We never use a third party to do anything that would be corrupt for us to do directly.
 - We adhere to guidance regarding gifts, entertainment and meals provided to HCPs, Public Officials, HCOs, patients, caregivers or PAGs.
 - We accept only nominal gifts, i.e., valued under \$100, such as a modest meal, bottle of wine or fruit basket, from non-healthcare vendors, suppliers or business partners that comply with our policies.
 - We do not offer cash, cash equivalents, tickets to events, sporting equipment, leisure trips or any gift for the personal benefit of an HCP, PAG, Public Official or HCO.



Who is a Public Official?

HCPs working in public hospitals or government institutions both in and outside the U.S. may be considered Public Officials. We must be particularly careful about following the restrictions that apply to working with Public Officials. A Public Official is any officer, employee or representative of a:

- Governmental Authority
- Commercial enterprise that is owned or controlled by a Governmental Authority. This includes state-owned or controlled veterinary, laboratory or medical facilities.
- Public international organizations, such as the International Monetary Fund, the United Nations or the World Bank

A Public Official may also be any person acting in an official capacity for any Governmental Authority such as:

- Politicians (such as members of Congress)
- Some payor and formulary committee decision-makers
- Medical and scientific personnel when they work as contractors or temporary workers at a government-owned hospital, clinic, university or other similar facility

In most countries outside of the U.S., HCPs (including investigators for clinical trials) and payors are considered Public Officials.



Exchanging gifts internationally

We must be particularly careful when exchanging gifts internationally. Gifting laws are more restrictive in some countries and are permissible only where local regulations allow. Before providing any gifts outside of the U.S., consult with International Legal and Compliance if you have questions.



Bribes

Bribes are not just payments of cash. They can also include:

- Cash equivalents, like gift cards
- Gifts
- Entertainment or hospitality when it exceeds a legitimate business purpose
- Travel arrangements or offers to arrange and pay for travel or accommodations when there is not a legitimate business purpose
- Service agreements that are not bona fide, only vaguely describe the services or are outside the consultant/vendor's line of business
- Offers of employment to an individual or his/her family member



Learn and discover

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

[Interactions with Payors and Public Officials](#)

[Promotional Speaker Programs and Speaker Training](#)

[Fee-for-Service Arrangements Policy](#)

[Meals, Gifts, and Entertainment Policy](#)

[Travel & Expense Reporting Policy and Guidelines](#)



? Question & Answer

Q: I'm flying to Europe on a business trip, and I've arranged for the transportation of some Blueprint items. I received a call from a colleague who flew in the day before. He told me that the customs official at the airport stopped my items in the hope that I could give him a small tip. Does the customs official have the right to request a tip?

A: No payment is due at customs, unless specifically required under local law. Even small unofficial payments are a form of bribery and are illegal in most countries. Blueprint also prohibits these types of payments, even if allowed under local laws. In this situation, do not make any payment unless you receive written confirmation from Legal or Compliance that the payment is required under local law.

Q: One of the vendors I'm considering for a big contract recently sent me box seat tickets to a baseball game. Can I accept them?

A: No. We can't accept gifts like expensive box seat tickets (i.e., valued over \$100) because they may appear to influence our decision-making. The vendor may even be *trying* to influence your decision about the contract by sending you the tickets at this time. This means the tickets could be seen as a bribe.



Learn and discover

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

[Travel & Expense Reporting Policy and Guidelines](#)

[Audit Committee Complaint Procedures](#)

We maintain accurate records

We are committed to transparency. That means we are responsible for maintaining accurate records so we can make strong business decisions and provide truthful information about Blueprint.

We do what's right

The reliability of our records and financial statements is critical to our business success. Blueprint, our stockholders, government agencies and the broader public depend on accurate records to make informed business decisions. We are each responsible for upholding integrity in our books and accounts.

We live our values

- We ensure our books, records and accounts accurately reflect all activities and transactions in accordance with applicable laws, regulations, standards, policies and procedures.
- We never create false or misleading entries for any business transaction.
- We never set up secret or unrecorded assets or liabilities.
- We submit records to internal and external auditors and regulators promptly and accurately.
- We disclose timely and accurate reports to regulatory agencies and other stakeholders in a fair, honest, timely and understandable way.
- We never take any action that may mislead or misinform anyone about our operations or finances.
- We consult the Audit Committee or contact the BlueCares Hotline if we are concerned that a record is inaccurate.



Third-party records

Keeping accurate books and records and the topic of bribery and corruption go hand-in-hand. There is never a reason to hide the purpose of a payment. We should be assured that all payments made through third parties on our behalf are legal, for legitimate purposes and aligned with our Core Values, policies and Code. If you ever have a question about any activity, reach out to your manager, Finance, Legal, Compliance or our BlueCares Hotline.



We market our products honestly

Customers depend on us for accurate and balanced information about the efficacy and safety of our products. We help HCPs and patients make informed decisions by educating about our products honestly.

We do what's right

Our work is based on science. We deliver precision therapies to patients using information grounded in our scientific expertise and research. We lead in advancing science and delivering new medicines by being proud of our work and always honest and transparent about our products.

We live our values

- We promote, market and educate truthfully and based on accurate and well-balanced scientific information.
- We provide fair balance when discussing our products and never overstate the efficacy or downplay the risks of our products.
- We ensure that promotional communications regarding our products are consistent with the approved labels.
- We never promote our products for unapproved uses.
- We respect the clinical judgments and decisions of HCPs.
- We discuss products with patients and caregivers only if we are authorized and trained to do so.

Learn and discover

[Interactions with Patients and Patient Advocacy Groups](#)

[Policy on Promotional Interactions](#)

[Non-Promotional and Medical Interactions](#)

[International Compliance Guide for Interactions with Healthcare Professionals and Healthcare Organizations](#)



Question & Answer

Q:

A doctor licensed in the UK approached me at a conference in the U.S. asking about one of our products. I only had materials based on the U.S. label. Is it okay to use those materials to discuss our product?

A:

No. You should ensure that all materials and messaging that you use with an HCP are approved for use in the country where the HCP is licensed and that you are authorized to use them. Note that certain rules that apply to our communications and activities may differ by country or location.





Learn and discover

[Interactions with Patients and Patient Advocacy Groups](#)

[Pre-Approval Access Policy for Investigational Medicines](#)

[International Compliance Guide for Interactions with Patient Advocacy Groups, Patients and Caregivers](#)

We act in the best interests of patients

Serving patients requires trust and we will never compromise that trust. We put patients at the center of everything we do and always act in their best interest.

We do what's right

We embrace our Core Value of "Patients First" in every decision and interaction. Through our roles at Blueprint, we may interact with patients, caregivers and patient organizations. Any time we engage with these important audiences, we prioritize the well-being and interests of patients and hold ourselves to the highest ethical standards.

Ex-U.S. patient interactions

In some instances, the laws, regulations or industry codes on interacting or communicating with patients and PAGs may be stricter outside the U.S. In these cases, please reach out to International Legal and Compliance for additional guidance.



We live our values

- We are honest, respectful and transparent when interacting with patients, caregivers and PAGs.
- We do not give medical advice to patients, even if we are a licensed HCP.
- We honor the patient and HCP relationship and respect the decision-making process between patients and their HCPs.
- We uphold patient rights and respect caregivers' responsibilities.
- We protect and process any patient or caregiver personal data that is entrusted to us according to all applicable data privacy laws.
- We respect the independence of PAGs.
- We engage PAGs only to support legitimate philanthropic, educational or scientific needs.
- We follow all regulations and standards for providing pre-approval access to our products and clinical trials to patients in need.
- We follow all laws, regulations, industry codes and policies and guidelines when interacting with PAGs, patients and caregivers at meetings and events.



Learn and discover

[Interactions with Patients and Patient Advocacy Groups](#)

[Privacy and Data Protection Handbook: EEA, CH, UK](#)

[Privacy and Data Protection Handbook: United States](#)

We protect privacy and personal data

We respect the privacy of others and have a legal responsibility to keep personal information confidential and secure.

We do what's right

In the course of our everyday work, we collect, store, use, share, delete or otherwise dispose of (also known as “process”) and protect the personal data of others respectfully, thoughtfully and in accordance with applicable laws.

We live our values

- We follow all applicable privacy and data protection laws and regulations.
- We communicate transparently and honestly about how we process personal data.
- We only collect the minimum amount of personal information necessary to achieve a legitimate business purpose.
- We keep personal information accurate, complete and up-to-date.
- We provide proper notice or obtain consent as legally required.
- We only share personal data with those who have a legitimate business need for the data.
- We follow Blueprint policies and guidelines when storing and destroying personal data.
- We report any actual or suspected data breaches when we become aware of them to Blueprint's [Data Privacy Task Force](#).



Question & Answer

Q:

I received an email from a doctor I work with containing some personal data about a patient. I think she sent this to me by mistake. Do I need to do anything about this?

A:

Yes. You should let the doctor know right away that she sent the email to you by mistake and that you will delete the email immediately.

Q:

As part of my job, I keep a spreadsheet that has information about patients. It includes their ethnicity, age (including date of birth), income, city and gender. Since this spreadsheet does not contain the patient's name, is it still considered personal data?

A:

Yes. This information could be used to identify an individual, either on its own or in combination with other information held by Blueprint, and you need to treat it as personal data and protect it in accordance with our Blueprint Privacy Policies. Your main concern should always be to protect the privacy of all personal data in your care—whether it is verbal, recorded, electronic or on paper.



Learn and discover

[Adverse Event and Product Complaint Policy](#)

[Interactions with Patients and Patient Advocacy Groups](#)

We ensure product safety and quality

In striving to develop precision therapies that will help patients and improve their lives, we must start by ensuring our products are safe and high-quality.

We do what's right

We know patients who battle life-threatening diseases anxiously await safe and effective medicines with each passing day. This drives us to put the safety, protection and benefit to patients first by assuring the highest product quality and data integrity.



We live our values

- We never sacrifice quality to meet a company target or deadline.
- We comply with all applicable requirements, such as Good Manufacturing Practices (GMP) and Good Distribution Practices (GDP), for research, manufacturing operations, product storage and product distribution.
- We maintain proper oversight of our third-party vendors to ensure that they are manufacturing our products according to the agreed-upon processes and procedures and in compliance with GMP and GDP.
- We maintain the quality and integrity of our clinical data from our clinical studies.
- We base all regulatory submissions on information that is complete and accurate.
- We report all Adverse Events (AE), Product (Quality) Complaints (PC), or Special Situations (collectively, "Reportable Events") when we become aware of them in accordance with Good Pharmacovigilance Practices (GVP).
- We speak up if we encounter issues related to product quality or safety.

How to report



PHONE:

U.S.: 1-888-BLU-PRNT(1-888-258-7768)

Europe: +31 85 064 4001



EMAIL:

U.S.: medinfo@blueprintmedicines.com

Europe: medinfoeurope@blueprintmedicines.com

Email is only permitted from a Blueprint email account (i.e., email ending in “@blueprintmedicines.com”).

You must report as soon as possible **but no later than one (1) business day or a maximum of (3) three calendar days** of becoming aware of the Reportable Event.



What are Adverse Events, Product (Quality) Complaints and Special Situations?

An **AE** is any unexpected medical occurrence in a patient who has been administered a medicinal product that is not necessarily caused by the product. Examples include effects temporally associated with use of the medicinal product, such as:

- Symptoms
- A disease
- Any unfavorable and unintended sign (e.g., an abnormal laboratory finding)

A **PC** is any complaint dealing with:

- A physical, chemical, microbiological or other alleged deterioration of a Blueprint product
- The possible failure of a Blueprint product to function as indicated
- The failure of a Blueprint product to meet any of its packaging specifications

A **Special Situation** includes:

- Use of a Blueprint product while pregnant (exposure via mother or father) and/or breastfeeding
- Any report of lack of efficacy of a Blueprint product
- Suspected AEs related to quality defects or falsified medicinal products
- Accidental or intentional medication errors or overdose of a Blueprint product
- Misuse, where the Blueprint product is intentionally and inappropriately used, including misuse for illegal purposes
- Abuse, which is defined as intentional excessive use of a Blueprint product
- Occupational exposure to a Blueprint product (e.g., an HCP is splashed with medicinal product while preparing an injection)
- Transmission of an infectious agent through a contaminated Blueprint product
- Reports of patient death after exposure to a Blueprint product where no other details are provided
- Off-label use of a Blueprint product



We uphold our reputation



Learn and discover

[Policy on Promotional Interactions](#)

[Communications Policy](#)

[Employee Social Media Guidelines](#)

We communicate responsibly

To help successfully execute on our Mission, we display honesty, integrity and transparency when communicating externally about Blueprint.

We do what's right

Every time we speak publicly about Blueprint, it is an opportunity to further uphold our values and reputation. Our reputation allows us to establish trust when collaborating with external partners. Our individual behaviors have the potential to reflect on the entire company, and we are all equally responsible for protecting our reputation.

We live our values

- We refer questions or inquiries from investors or members of the media to authorized Blueprint spokespersons.
- We use social media responsibly by following our social media guidelines.
- We fully disclose our affiliation with Blueprint and make clear that our opinions are our own and not attributable to Blueprint unless specifically authorized to post or speak on Blueprint's behalf.
- We never share confidential or proprietary information with external parties unless authorized to do so.
- We never represent our personal views as those of Blueprint.



External speaking engagements

You may occasionally be offered the opportunity to engage in external speaking engagements. You are responsible for ensuring the presentation does not contain confidential or proprietary information and that you only speak on behalf of Blueprint when specifically authorized to do so.

? Question & Answer

Q: I was working the booth at a conference when an investor approached me and asked questions about Blueprint. May I answer the questions?

A: Unless you are specially authorized to speak to investors, you should politely inform the requestor that you are not authorized to respond to the questions and instead connect that person to the Corporate Affairs team.

Q: I noticed a social media post that had inaccurate information about a Blueprint product. Can I respond to the post to correct the misinformation?

A: If you see information on social media that may be incorrect or harmful to Blueprint, you should not respond to the post. Instead, please alert Corporate Affairs by emailing SocialMedia@BlueprintMedicines.com.

We safeguard confidential information

Our confidential information allows us to work toward advancing science and delivering new medicines. We must protect it so we can fulfill our Mission to improve patients' lives.

We do what's right

At Blueprint, we are constantly in the process of handling, gathering and creating confidential information. This confidential information could be about Blueprint or about our third-party collaborators. It could be the structure of our compounds, a product marketing strategy, a collaboration we are negotiating or a list of prices from a supplier. Whether it is related to finances, marketing, research, third parties, patients, the Blue Crew or our practices—we must safeguard it. This confidential information plays a vital role in our business and ability to compete.

Each of us is responsible for keeping confidential information of Blueprint or third parties, including our collaborators, vendors and even that of prior employers, confidential, unless and until that information is released to the public through approved channels (for example, through a press release, SEC filing or a formal communication from an Executive Team member).

Reminder: Our obligations to protect Blueprint confidential information don't prevent us from engaging in any of the activities listed on the top right of p. 11 of this Code.



We live our values

- We use confidential information solely for legitimate business purposes.
- We only share confidential information internally with those who have a need to know such information in order to carry out their responsibilities for Blueprint, and when we do, we ensure they are aware of the confidential nature of the information.
- We do not disclose confidential information, except when authorized by Blueprint or required by law.
- We take appropriate precautions to ensure that materials that contain confidential information, such as memos, lab notebooks, laptop computers and sensitive communications, are stored securely.
- We return Blueprint's confidential information to the company at the end of our employment.
- We do not post or discuss confidential information on the Internet.



What is confidential information?

“Confidential information” is any non-public information, including information that might be useful to competitors or harmful to Blueprint or our Customers if disclosed. Examples include:

- Proprietary information, such as compound structures, undisclosed targets and business plans
- Trade secrets and other intellectual property
- Non-public financial information (including pricing, revenue and expenses) and projections of future earnings or losses or other earnings guidance
- Marketing and promotion plans
- Customer, patient, HCP, HCO and supplier lists
- Research and development information, including clinical trial data and interactions with regulatory authorities
- Procurement information
- Blue Crew data
- Information about potential collaborations, acquisitions, investments and divestitures





We conduct business with integrity around the world

We do our part in helping make the world a better place by acting with integrity everywhere we do business and by following local laws and laws that govern international trade.

We do what's right

As a global biopharmaceutical company, we must follow the laws that apply to us everywhere we operate. International trade laws and local regulations influence and protect the countries they serve and the way we do business, including how we export products and import raw materials. By following these laws, we protect our business and help make the world a safer place.



We live our values

- We follow all applicable laws and regulations in the countries where we do business, such as when we recruit new Blue Crew and market or distribute across borders.
- We follow the import and export regulations for marketing, labeling and valuing our products.
- We never do business with sanctioned entities or countries or with individuals subject to U.S. or other applicable embargoes.
- We contact Legal if a Customer, HCP, HCO, vendor or other business partner asks us to participate in an illegal boycott.



Trade sanctions

Governments and international organizations may impose trade restrictions over nations, organizations and individuals. These limits can include trade embargoes or boycotts, travel or cash transfer bans or the freezing of assets. We must follow these trade restrictions. We cannot work with entities on the Specially Designated Nationals and Blocked Persons (SDN) List. Working with these individuals may lead to severe penalties.

We trade securities lawfully

Integrity is in our DNA and at the heart of all our actions, both inside and outside of work. We uphold our integrity by never engaging in insider trading.

We do what's right

We are responsible for protecting confidential, material, non-public information we learn in the course of our jobs. That includes information that belongs to Blueprint or other companies, such as our collaborative partners or vendors. Insider trading is when an individual uses "inside" (material non-public) information to inform their investment choices in the stock market or shares it with others to do the same. Insider trading is illegal, and we must do everything we can to prevent it.



Examples of potential material non-public information

Whether a piece of information is material or not will depend on the circumstances and will evolve over time. It will depend on, for example, the stage of the company, our products and pipeline, our financial resources and analyst/investor expectations. The following is a non-exhaustive list of the types of information that might be considered material information for a publicly traded biotechnology company.

- The status of clinical trials (e.g., initiation, enrollment or completion)
- Efficacy/safety results from clinical trials (if no prior disclosures)
- Updated efficacy/safety results from clinical trials (if not consistent with prior disclosures)
- Decisions by regulatory authorities related to our product candidates
- Undisclosed financial performance information, including corporate earnings or earnings forecasts
- Changes in executive officers or board membership
- Actual or threatened litigation (civil, criminal or otherwise)
- Investigations by governmental agencies
- Pending or proposed collaborations, partnerships, mergers, acquisitions, investments or divestitures

We trade securities lawfully (*continued*)



We live our values

- We never buy or sell shares in any publicly traded company when in possession of inside information.
- We never buy or sell shares until inside information has become public and generally available.
- We do not disclose inside information to anyone outside of Blueprint nor do we ask them to trade on inside information on our behalf. This includes family members and friends.
- We only share inside information with our Blue Crew colleagues on a “need-to-know” basis.
- We do not engage in “tipping.” This is when we directly or indirectly pass non-public information to anyone who may trade using the information.
- We designate individuals who regularly have access to potentially material nonpublic information based on their role within Blueprint as “Insiders.” Insiders must pre-clear all trades in Blueprint securities with Legal (unless the trades are under a 10b5-1 plan).
- We report suspected violations by contacting Legal, Compliance, HR, Finance or the BlueCares Hotline.

Learn and discover

[Statement of Company Policy on Insider Trading and Disclosure](#)

[Special Trading Procedures for Insiders](#)

[FAQ-Insider Trading Policies and Insider Status](#)

[Communications Policy](#)



? Question & Answer

Q: I was talking to my husband at dinner the other night about an important merger between one of Blueprint’s collaboration partners and another corporation. The merger had not yet been announced, but I learned about it in a Blueprint meeting I had earlier that day. The next day he told me he had bought stock in one of the corporations on his investment app. Is this a problem?

A: Yes. The information about the merger was confidential. You cannot discuss confidential information with anyone outside the company or anyone inside the company who doesn’t need to know. Sharing sensitive information with someone else that may lead them to purchase securities using the information is called “tipping.” Even unintentional tipping is illegal. You should report this immediately.



We proactively manage conflicts of interest

We put Blueprint interests first and make objective business decisions that support our Mission.

We do what's right

We strive to avoid even the appearance of conflicts of interest, which can damage our reputation and undermine the trust others place in us. A “conflict of interest” is when a personal interest conflicts with Blueprint’s interests. Conflicts can interfere with the important work we are doing each day and jeopardize our reputation.

We live our values

- We watch out for situations where our personal activities or relationships could interfere with our objectivity.
- We disclose potential conflicts of interest to our manager and the Chief Compliance Officer.
- We ask for advice if unsure whether a conflict exists.
- We make business decisions based on good judgment and not personal interest.





What might a conflict of interest look like?

- **Personal Relationships:** Hiring or working with a family member, member of our household or romantic partner could affect our objectivity and create a conflict of interest. We must inform our manager if a family member, member of our household or romantic partner works or intends to work for Blueprint.
- **Outside Activities:** While we are empowered to pursue outside activities, we must ensure they do not hurt or create conflicts with our ability to perform our work.
 - o We must disclose any outside employment, including consulting arrangements, and seek HR and manager approval.
 - o We could find ourselves in situations where we may be perceived as speaking on behalf of Blueprint, such as when presenting at conferences or speaking to members of the press. Before confirming an opportunity to speak at a conference on behalf of Blueprint, you must secure approval from your direct line Vice President.
 - o Any interactions with members of the media that reference your role or work at Blueprint must be approved and facilitated by a member of our Corporate Communications team.
 - o We must disclose and seek prior approval from our manager and Legal or Compliance when considering whether to accept a seat on the board of directors or advisory board of any of our Customers (including professional or patient advocacy organizations), business partners, vendors or other companies.
 - o Our Senior Vice Presidents and above must also receive
- prior approval from our Chief Executive Officer and our Chairman prior to accepting any third-party board or consulting roles or other outside engagements.
- **Corporate Opportunities:** We may discover other business opportunities through our work with Blueprint. We can only pursue these if they have already been presented to, and rejected by, the company. Please consult with Legal or Compliance should this situation arise.
- **Financial Conflicts:** Investing in a company that competes with Blueprint or provides services to Blueprint could be a conflict of interest. These types of investments are generally prohibited. Please consult your manager or the policy if you have questions.



We compete fairly

We believe earning business on the merits of our science and our products through fair and open competition benefits patients and society.

We do what's right

Scientific discovery is driven by collaboration. We depend on the work of our business partners, competitors and HCPs to help us—as a company and as world citizens—tackle complex medical challenges and develop innovative solutions. Fair competition protects patients and society by encouraging fair and open markets. That's why we welcome competition and compete fairly, everywhere we operate.

We live our values

- We do not discuss or negotiate pricing, bidding processes or market allocation with competitors.
- We do not abuse a dominant market position nor do we inhibit competition by engaging in discussions or practices that unfairly restrict trade or exclude competitors from the marketplace.
- We use only legal and reasonable methods to obtain competitive information. We do not engage in espionage or deception to get information about competitors.
- If a conversation turns to any kind of anti-competitive discussion, we refuse to discuss the matter and report it to Legal or Compliance immediately.



? Question & Answer

Q: One of my Blue Crew colleagues used to work for a competitor. I'm designing a new marketing campaign, and I think it would be helpful to know how the competitor targets certain markets so we can plan our strategy around theirs. Can I ask my Blue Crew colleague to share with me the strategic objective documents from her prior employer?

A: No. We are not allowed to share confidential, sensitive information about companies we have worked for without their express prior permission. Not only would it be unfair to ask your colleague to disclose sensitive information and potentially violate their confidentiality and non-use obligations to their former employer, but it may also be illegal. At Blueprint, we only gather competitive information honestly and transparently.

Q: I was recently at a trade meeting where potential competitors were also in attendance. We started discussing pricing strategies. Is it appropriate to engage in these conversations?

A: It is not appropriate to discuss this type of information with competitors or potential competitors. If you find yourself in this situation, you should respectfully remove yourself from the situation immediately and alert Legal or Compliance.



Learn and discover

[Acceptable Use Policy](#)

[Information Security Policy](#)

[Technology Equipment
Disposal Policy](#)

We protect our assets

We use our assets to advance our work and help patients. We are all responsible for protecting these assets from theft and misuse.

We do what's right

We have a profound sense of mission at Blueprint. As a team, we relentlessly focus on driving new innovations and delivering life-changing treatments, never resting on prior success. Our electronic, financial and physical assets help us innovate, collaborate and deliver each day. Loss, theft and misuse of these assets directly impacts our business and progress. When we keep them safe, we keep ourselves on the right track.

What are Blueprint's assets?

Our assets are:

- **Physical:** Equipment, tools, physical servers, machinery, furniture and facilities
- **Information:** Private data and confidential information
- **Intangible:** Reputation, ideas, intellectual property and trade secrets
- **Financial:** Money in any form and investments



Reminder: Our obligations to protect Blueprint assets don't prevent us from engaging in any of the activities listed on the top right of p. 11 of this Code.

We live our values

- We take steps to protect Blueprint assets from damage, abuse, waste, loss or theft.
- We ensure our assets are used for legitimate business purposes and reasonable personal use.
- We are careful when using information systems and the electronic data they store, process or transmit.
- We handle Blueprint funds and resources responsibly.
- We never remove Blueprint assets from company facilities for personal use.
- We promptly report any abuse, misuse or theft of assets to Legal, Compliance or the BlueCares Hotline.

? Question & Answer

Q: Sometimes I need to take my work laptop home. Would my kids be able to use the laptop to do their homework when I'm not using it?

A: No. We cannot allow anyone outside the company to use Blueprint assets. Our assets must be used only for legitimate business purposes or reasonable personal use. Letting unauthorized people use a company computer is not considered reasonable personal use.



We are good corporate citizens

We respect human rights

We seek to improve lives across the globe by respecting and protecting human rights.

We do what's right

As a global company, advancing our Mission and committing to doing what's right includes respecting internationally recognized human rights. We respect the human, cultural and legal rights of all people and communities.

We live our values

- We partner with suppliers who use fair labor and sustainable sourcing practices.
- We never use or condone human trafficking, slavery or child or prison labor anywhere in the world.
- We refuse to look the other way when we suspect human rights violations. We speak up and alert Legal or Compliance.



? Question & Answer

Q: A newspaper recently published some concerning things about one of our suppliers. The article outlined their payment structure, which showed that most employees are paid an extremely low amount for 12-hour workdays. The article also accused the supplier of using child labor! Is there anything I can do about this?

A: We expect our suppliers to uphold human rights and use fair working conditions. We would not work with companies that use child labor. You should report this to Legal or Compliance.



Learn and discover

[Blue Crew Communities](#)
[Blink Page](#)

[Grants, Donations, Sponsorships,
Memberships, and Third-Party
Support Policy](#)

We care deeply about our communities

We commit to making a positive impact on the communities where we work and live.

We do what's right

We remember what matters—the patients we serve, the Blue Crew and our communities. We do more than deliver innovative treatments to patients. We lead and engage in initiatives that will have a lasting, positive impact in our communities.



We live our values

As a company, we support:

- Partnerships with organizations that are advancing opportunities in STEM education for underserved populations.
- Programs to enhance diversity in the biopharmaceutical industry.
- Blueprint Medicines Fellowship Program for high-potential university graduates.
- Company-wide community service opportunities, including an annual Employee Service Day coordinated by our Core Values Team.
- Donations and volunteer hours through our Company Match Program to organizations that are advancing social justice and humanitarian causes.

As individuals:

- We volunteer to make a positive difference in our communities.
- We participate in charitable activities.
- We never pressure others to contribute.
- We ensure these activities do not create a conflict of interest or interfere with our work.
- We obtain approval before donating Blueprint funds.



We protect the environment

We are devoted to improving the health of patients through innovative science, and we believe part of this commitment includes a responsibility to care for our environment.

We do what's right

We recognize that our work has an inherent impact on the environment. We also recognize how integral the environment is to the well-being of our company and all people. That's why we strive to minimize our impact and protect the environment. Each of us is responsible for being an environmental steward and looking for ways to go green.

? Question & Answer

Q: I want to do more to help the environment. What can Blueprint do to help me make a difference?

A: We are working to expand our sustainability efforts as our company continues to grow. Speak to your manager or the Green Team about how you can participate in these programs.

We live our values

As a company, we support:

- Educational seminars and campaigns for the Blue Crew about sustainability best practices coordinated by our Green Team.
- Commuter benefits, including bike-to-work and public transportation subsidies to help reduce carbon emissions.
- Waste reduction programs, including composting and recycling efforts.

As individuals:

- We take part in company initiatives to use less energy and produce less waste.
- We look for opportunities to work with Customers and business partners that share our vision of more sustainable packaging design and production processes.





Learn and discover

[Employee Social Media Guidelines](#)

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

[Conflicts of Interest Policy](#)

[Travel & Expense Reporting Policy and Guidelines](#)

We participate responsibly in the political process

We act with integrity as a company and as individuals when participating in the political process.

We do what's right

At Blueprint, we feel empowered to exercise our rights as citizens and participate in the political process. We support the rights of everyone on the Blue Crew to join in, express their beliefs and help create a fairer society. But we are careful that our outside political pursuits do not interfere with work responsibilities. We also uphold our company's reputation by never using Blueprint's name or resources for personal political purposes.



We live our values

- We identify any political statements as reflecting our own personal views, not those of Blueprint.
- We never reference Blueprint when making personal political contributions.
- We do not use Blueprint time, facilities or resources to support a personal political cause, party or candidate.
- We don't pressure our colleagues to contribute to, support or oppose any political candidate or party.
- We obtain prior approval for and coordinate political contributions made using Blueprint funds through Corporate Affairs, Finance and Legal.
- We never make political contributions using Blueprint's funds with the expectation of a direct or indirect return.
- We work with our manager and Legal to ensure we follow local campaign finance and election laws wherever we do business.
- We follow the laws on lobbying and never try to "buy influence."
- We consult with our manager and the Chief Compliance Officer in advance if we decide to run for political office to avoid potential conflicts of interest.

Resources and conclusion

In the pursuit of bringing life-changing therapies to patients in need, Blueprint aims to foster a culture where every member of the Blue Crew is accountable to ACT with courage, feel EMPOWERED to use their voice to SPEAK UP and do the right thing. We are each responsible for leading with integrity and upholding this Code and our Core Values each day in support of our Mission. But we are not in it alone. There are many resources available to help us when we have questions. We can rely on the collective knowledge of the Blue Crew. We shouldn't pretend, or seek, to know it all.

For general questions or to report a concern, we can contact:

- A manager
- Legal and Compliance
- Finance
- Human Resources
- Our BlueCares Hotline
 - Call:
 - United States: 1-844-857-5642
 - France: +33 (0)-800-99-0011*
 - France/Paris Only: +33 (0)-800-99-0111*
 - Germany: +49 (0)-800-225-5288*
 - Spain: +34 (0)-900-99-011*
 - Italy: +39 (0)-800-172-444*
 - Switzerland: +41 (0)-800-89-0111*
 - Netherlands: +31 (0)-800-022-9111*
 - UK: +44 (0)-800-89-0011*
 - *When calling, users are requested to prompt the following number: 844-857-5642.
 - Visit:
 - <http://blueprintmedicines.ethicspoint.com>

BlueCares



Thank you for your commitment to conducting Blueprint business with integrity. It's in our DNA.



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