

A MESSAGE FROM OUR CEO

ABOUT OUR CODE OF CONDUCT AND ETHICS



Our vision at Anaptys is to transform patient health by delivering innovative immunology therapeutics. In pursuit of this vision, and as our company continues to scale and grow, we prudently deploy our capital and resources to pursue groundbreaking science while never losing sight of the needs of patients, employees, investors and the community.

Our Code of Conduct and Ethics is our guide to how we conduct ourselves and our activities globally. I encourage you to read our Code carefully and live it daily so that together, we can deliver on our vision and transform the lives of patients with autoimmune and inflammatory diseases.

Dan Faga
President and Chief Executive Officer



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OUR VISION:

Transform patient health by delivering innovative immunology therapeutics.

OUR VALUES AND BEHAVIORS:



Transparency:

- ✓ I act ethically, with integrity and honesty
- ✓ I communicate as clearly as I can, even when the truth is difficult
- ✓ I provide context to ensure my audience understands the why behind decisions and actions

Accountability:

- ✓ I accept full ownership of my commitments, words and actions
- ✓ I work cross-functionally and empower and trust others to achieve their commitments
- ✓ I show up to work and meetings on time and am well prepared

Humility:

- ✓ I lead by actively listening, supporting and respectfully challenging others, because together we'll achieve more
- ✓ I own and learn from my mistakes, and recognize opportunities for process improvements in myself and others
- ✓ I assume positive intent by others

WHAT YOU SHOULD KNOW ABOUT OUR CODE OF CONDUCT

AnaptysBio, Inc., a Delaware corporation (collectively with its subsidiaries, the "**Company**"), has adopted this Code of Conduct and Ethics (this "**Code**") to set high standards of ethical business conduct and provide guidance applicable to every employee, including every officer, and director of the Company.

SCOPE

This Code shall apply to all the Company's employees, directors and any other individuals engaged in business for Anaptys. The Company may modify or update these more specific policies and procedures from time to time and adopt new Company policies and procedures in the future.

Nothing in this Code is intended to alter the existing legal rights and obligations of the Company or any of its employees or directors, including "at will" employment arrangements or the terms of any employment-related agreements.

RESPONSIBILITY

It is every employee's and director's responsibility to read and understand this Code, and to use it as a guide to the performance of his or her responsibilities for the Company. This Code cannot address every ethical issue or circumstance that may arise, so, in complying with the letter and spirit of this Code, employees and directors must apply common sense, together with high personal standards of ethics, accountability, transparency and humility, in making business decisions where this Code has no specific guideline. In complying with this Code, employees and directors should also consider the conduct of their family members and others who live in their household.

The Company expects all of its directors, executives, managers and other supervisory personnel to help foster a sense of commitment to this Code among all of its employees and to foster a culture of fairness, honesty and accountability within the Company. The Company also expects such personnel to ensure that the Company's agents and contractors conform to Code standards when working on the Company's behalf.

COMPLIANCE

Any employee who needs help understanding this Code or how it applies to conduct in any given situation, should contact his or her supervisor or the Company's Compliance Officer. The Company has designated the Company's Chief Legal Officer as its Compliance Officer (the "**Compliance Officer**"). In the event of the General Counsel's unavailability, the Company's Chief Executive Officer or another officer designated by the Chief Executive Officer shall be authorized to serve as the Compliance Officer in the interim.

Employees should also be alert to possible violations of this Code by others and should report suspected violations, without fear of any form of retaliation, as described under *Compliance Standards and Procedures* below.

APPLICABLE DOCUMENTS

This Code is intended to supplement and not to replace existing Company policies and procedures, as they may exist from time to time.



WE PROTECT PATIENTS

We're proud to advance treatment options for the millions of people living with debilitating symptoms and decreased quality of life, despite available treatments for autoimmune and inflammatory diseases. We're all accountable to maintain high ethical standards and ensure that our antibodies are considered safe and effective.

Patients and healthcare providers rely on our information, so we must act transparently, objectively and responsibly when we interact with them. Sharing accurate scientific information is vital to improving the lives of the patients we aim to serve. The integrity of our information assures regulators and patients that our products are not misrepresented.

Every decision we make is in service of delivering on the promise of our immune cell modulators.

WE PROTECT PATIENTS BY:

- ✓ Complying with all laws and regulations relating to the conduct of clinical trials in order to protect the health, safety and privacy of the individuals who participate in our clinical trials
- ✓ Always acting in the best interest of patients, and direct them to their doctor or healthcare provider to discuss their health
- ✓ Making sure the information we provide about our immune cell modulators and the diseases they treat is complete, accurate, fair, balanced and based on scientific evidence
- ✓ Only making statements on Anaptys' behalf if we have the proper authorization to do so
- ✓ Providing only Company-approved materials for their defined use



WE VALUE OUR COMMUNITY

That includes the community where we work and live. We strive to create an inclusive community and culture that allows everyone to do their best work at Anaptys. We embrace our diversity and celebrate the creative value that each of us brings based on our unique backgrounds, perspectives, skills and abilities. And we are committed to supporting and improving the health and safety of our employees and the environment we share.

Additionally, we recognize that some of the most vulnerable communities who need us are right in our back yard. Since we are a San Diego-based company, we have focused our efforts on helping the vulnerable communities in San Diego. We are active contributors, in funding and through volunteer hours, to several San Diego area non-profits, including Life Science Cares San Diego.

WE VALUE OUR COMMUNITY BY:

- Treating each other with respect. Always, under all conditions
- Fostering a culture where all points of view can be heard
- Embracing humility by encouraging and listening to colleagues and stakeholders speak up with new ideas and constructive dialogue
- Taking care to follow safety, health and environmental guidelines and requiring our partners to do the same
- Knowing what to do to keep others safe in case of injury or workplace emergencies and when using hazardous materials
- Providing full, fair, accurate, timely and clear information to stakeholders



WE SAFEGUARD OUR COMPANY

OUR GENERAL LEGAL AND ETHICAL OBLIGATIONS

The Company's success depends upon each employee and director performing his or her Company duties in compliance with applicable laws and in cooperation with governmental authorities. It is essential that employees and directors know and understand the legal and regulatory requirements that apply to the Company's business and to their specific area of responsibility. While employees and directors are not expected to have complete mastery of these laws, rules and regulations, they are expected to be able to recognize situations that require them to consult with others to determine the appropriate course of action. To address questions in the area of legal compliance, employees should approach their supervisor or the Compliance Officer immediately.

Legal compliance is only a part of the Company's ethical responsibility, however, and should be viewed as the minimum acceptable standard of conduct. The Company strives to act with the utmost integrity, not just in its most important corporate decisions, but also in the actions taken every day by its employees and directors. Ethical conduct is a high ideal, but often just means exercising common sense and sound judgment. Acting ethically will help the Company become a better company, a better partner for other companies and a better corporate citizen.

INTERNATIONAL BUSINESS LAWS

Employees and directors are expected to comply with all applicable laws wherever they travel on Company business, including laws prohibiting bribery, corruption or the conduct of business with specified individuals, companies or countries. The Company also expects employees and directors to continue to comply with U.S. laws, rules and regulations governing the conduct of business by U.S. citizens and corporations outside the U.S. Employees and directors who have questions as to whether an activity is restricted or prohibited should contact the Compliance Officer before taking any action.

All persons subject to this Code must comply fully with the Foreign Corrupt Practices Act (FCPA) and other applicable laws that prohibit bribery, kickbacks and corruption. Many of these laws are very broad and apply to both government and private or commercial bribery, kickbacks and corruption. Employees and directors are responsible for ensuring that they understand the applicable laws and our Anti-Corruption Policy. Employees and directors should consult with our Compliance Officer if they have a question regarding any gift, entertainment or other expense, before they incur or authorize the expense.

The Company is committed to complying fully with applicable trade laws and regulations involving importing and exporting products, services and technology, and we abide by sanctions prohibiting business with affected countries, regions, individuals or entities. Employees with roles that include importing, exporting or transferring goods, services or technology must ensure that such transactions comply with applicable import/export laws and embargoes and should consult with the Compliance Officer when in doubt.

CONFLICTS OF INTEREST

Every employee and director must act within guidelines that prohibit real and potential conflicts of interest with your role at the Company. Generally, conflicts of interest are situations that divide an employee or director's loyalty between the Company, on the one hand, and their own personal interests, on the other. Determining whether a conflict of interest exists is not always easy to do. Even the appearance of a conflict of interest could create a problem. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, an employee must first notify their manager or our Compliance Officer and a director must notify the Chair of the Audit Committee of the Board ("**Audit Committee**"), and then receive written approval to engage in the activity, transaction and/or relationship.

In evaluating whether an actual or contemplated activity may involve a conflict of interest, an employee or director should consider:

- Whether the activity would appear improper to an outsider;
- Whether the activity could interfere with the job performance or morale of a Company employee;
- Whether the employee or director involved in the activity has access to confidential Company information or influence over significant Company resources or decisions;
- Potential impact of the activity on the Company's business relationships, including relationships with suppliers, competitors, partners, employees and anyone else with whom he or she has contact in the course of performing his or her job; and
- Extent to which the activity could benefit the employee or director or his or her relative, directly or indirectly.

EXAMPLES OF ACTIVITIES THAT COULD INVOLVE CONFLICTS OF INTERESTS INCLUDE:



- **Conflicting Employment:** An employee, director, or their family member is working or consulting for a competitor or potential competitor.
- **Hiring Related Parties:** Hiring or supervising family members or others with whom the employee has a close, personal relationship.
- **Business Transactions with Related Parties:** Awarding Company business to a company owned or controlled by an employee of the Company or a member of his or her family.
- **Board or Advisory Service:** Serving as a board member or advisor for an outside company or organization.
- **Investments:** Owning or having a substantial interest in a competitor, supplier, contractor or collaborator.
- **Gifts:** Accepting gifts, discounts, favors or services from someone from the medical community, a vendor or supplier, a contract research organization ("**CRO**"), a regulator, a collaborator or a competitor, unless equally available to all Company employees. See subsection Gifts and Entertainment for further discussion of the issues involved in this type of conflict.

EXAMPLES OF ACTIVITIES THAT COULD INVOLVE CONFLICTS OF INTERESTS INCLUDE (CON'T):

- **Interested Party Transactions:** Taking personal advantage of the Company's business opportunities. See subsection Corporate Opportunities for further discussion of the issues involved in this type of conflict.
- **Company Loans:** An employee or director receiving a loan or guarantee from the Company that benefits them or their family members.

Employees must avoid these situations (and others like them), whenever their loyalty to the Company could be compromised. Employees who believe they are involved in a potential conflict of interest are expected to discuss it with the Compliance Officer.

Like employees, directors should also seek to avoid conflicts of interest with their obligations to the Company. To that end, any director who confronts a conflict of interest in connection with a decision to be made by the Board of Directors, or otherwise, should take such steps as are necessary to avoid the conflict of interest, including notifying the Chairperson of the Board of Directors and Chief Executive Officer and, if appropriate, recusing himself or herself from discussions by the Board of Directors which could be perceived to create such a conflict.

GIFTS AND ENTERTAINMENT

Building strong relationships with suppliers and partners is essential to the Company's business. Socializing with suppliers and partners is an integral part of building those relationships. However, good judgment should be exercised in providing or accepting business meals and entertainment or inexpensive gifts, so that all such conduct is consistent with customary and prudent business practices.

While individual circumstances differ, the overriding principle concerning gratuities is not to give or accept anything of value that could be perceived as creating an obligation on the part of the recipient (whether a Company employee, a supplier or a partner) to act other than in the best interests of his or her employer or otherwise to taint the objectivity of the individual's involvement. It is the responsibility of each employee to ensure that providing or accepting a gratuity is appropriate under the circumstances.

This principle applies to the Company's transactions everywhere in the world, even if it conflicts with local customs. Under some statutes, such as the United States Foreign Corrupt Practices Act, giving anything of value to a government official to obtain or retain business or favorable treatment is a criminal act subject to prosecution and conviction. For more information, see the Company's Anti-Corruption Policy.



CORPORATE OPPORTUNITIES

Employees and directors may not take advantage of any opportunities discovered through their job with the Company for personal gain, or for the personal gain of a roommate, close friend, relative or significant other, unless the opportunity is disclosed to and pre-approved by the Compliance Officer. These opportunities include, among others, the Company's sales and other business development opportunities, inventing products and writing books.

EMPLOYEE LOANS

Loans to employees or their family members by the Company, or guarantees of their loan obligations, could constitute an improper personal benefit to the recipients of such loans or guarantees. Accordingly, Company loans and guarantees for executive officers and directors are expressly prohibited. Any material loans to employees require the prior approval of the Board of Directors.

RELATED-PARTY TRANSACTIONS

You should avoid conducting any Company business with a relative or significant other, or with a business with which you, a relative or significant other is significantly associated. A potential conflict of interest can arise if you direct business from the Company to these types of related parties. To prevent a conflict of interest, employees directing business to or from the Company should discuss the situation with their manager and remove themselves from the decision-making process. Even if a related-party transaction appears to be in the Company's best interests, you must first fully disclose the transaction to our Compliance Officer, and receive approval from our Audit Committee, before engaging in that transaction. If you discover after the fact that we have done business with a related party, you must promptly report it to our Compliance Officer. The Company will conduct a review of all related-party transactions for potential conflicts of interest situations. For more information, see the Company's Related-Party Transactions Policy.

INSIDER TRADING

Every employee and director is prohibited from using "inside" or material nonpublic information about the Company, or about companies with which it does business, in connection with buying or selling the Company's or such other companies' securities, including "tipping" others who might make an investment decision on the basis of this information. It is illegal, and it is a violation of this Code and other Company policies, to tip or to trade on inside information. Employees or directors who have access to inside information are not permitted to use or share that inside information for stock trading purposes or for any other purpose except to conduct Company business.

Employees must exercise the utmost care when in possession of material nonpublic information. The Company's **Insider Trading Policy** provides guidance on the sorts of information that might be nonpublic and material for these purposes and guidelines on when and how employees and directors may purchase or sell shares of Company stock or other Company securities. The Company strongly encourages all employees and directors to review the Company's **Insider Trading Policy** for additional information.

COMPETITION AND FAIR DEALING

The Company strives to compete vigorously and to gain advantages over its competitors through superior business performance, not through unethical or illegal business practices. Each employee and director must deal fairly with the Company's suppliers, competitors, partners, employees and anyone else with whom he or she has contact in the course of performing his or her job. No employee or director may take unfair advantage of anyone through manipulation, concealment, abuse or privileged information, misrepresentation of facts or any other unfair dealing practice.

POLICIES SPECIFIC TO PROCUREMENT

Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favors.

ANTITRUST LAWS

Antitrust laws are designed to protect customers and the competitive process. These laws generally prohibit the Company from establishing:

- Price fixing arrangements with competitors;
- Arrangements with competitors to share pricing information or other competitive marketing information, or to allocate markets or customers;
- Agreements with competitors or customers to boycott particular suppliers, customers or competitors; and
- A monopoly or attempted monopoly through anticompetitive conduct.

Some kinds of information, such as pricing, product development progress and results of clinical trials, should never be exchanged with competitors, regardless of how innocent or casual the exchange may be, because even where no formal arrangement exists, merely exchanging information can create the appearance of an improper arrangement.

Noncompliance with the antitrust laws can have extremely negative consequences for the Company, including long and costly investigations and lawsuits, substantial fines or damages, and adverse publicity. Understanding the requirements of antitrust and unfair competition laws of the jurisdictions where the Company does business can be difficult, so employees and directors are urged to seek assistance from the Compliance Officer whenever they have a question relating to these laws.



MAINTENANCE OF CORPORATE BOOKS, RECORDS AND ACCOUNTS; FINANCIAL INTEGRITY; PUBLIC REPORTING

All employees and directors are expected to act responsibly and exercise sound judgment with respect to our finances and financial and other public reporting. Investors rely on accurate and fair financial and business information to understand our financial results and make informed decisions. Employees and directors may execute financial transactions only with authorization and in compliance with our policies. Employees and directors also are expected to record and report all financial transactions and business information honestly and accurately, to comply with our system of internal controls and to follow applicable laws, regulations and accounting practices.

If an employee or director contributes in any way to the preparation or verification of the Company's financial statements and other financial information, they must ensure that our books, records and accounts are accurately maintained. Employees and directors must also cooperate fully with the Company's finance department, as well as the Company's independent public accountants and counsel.

If any employee becomes aware that the Company's public disclosures are not full, fair and accurate, or if any employee becomes aware of a transaction or development that he or she believes may require disclosure, he or she should report the matter immediately to the Compliance Officer.

RECORDS MANAGEMENT

The Compliance Officer (or his or her designee) has companywide responsibility for developing, administering and coordinating the record management program, and issuing retention guidelines for specific types of documents. Records should be maintained to comply with applicable statutory, regulatory or contractual requirements, as well as those pursuant to prudent business practices. Employees can contact the Compliance Officer for specific information on record retention.

POLITICAL CONTRIBUTIONS AND GIFTS

The Company reserves the right to communicate its position on important issues to elected representatives and other government officials. It is the Company's policy to comply fully with all local, state, federal, foreign and other applicable laws, rules and regulations regarding political contributions. For more information, see the Company's Anti-Corruption Policy. Per corporate policy, we do not make direct contributions to political campaigns or candidates.

Employees are free to engage in political activities so long as they do so in an individual capacity and do not create the impression that they are doing so on behalf of the Company or use any of the Company's assets, facilities or resources in support of personal political activities.



CONFIDENTIALITY

Confidential information includes all non-public information (regardless of its source) that might be of use to competitors, or harmful to the Company, its suppliers or its partners, if disclosed, including any proprietary information shared with the Company by its suppliers and partners, or information that has been acquired by an employee during the course of working for a former employer. The Company employees have an equal obligation to protect against the unauthorized disclosure or misuse of such third-party confidential information.

Anyone who has had access to confidential Company information must keep it confidential at all times, both while working for the Company and after employment ends. Employees should not discuss sensitive matters or confidential information in public places, and they should avoid discussing confidential information on cellular phones to the extent practicable. Employees may not discuss the Company's business in any Internet "chat room," blog, social media site or other online forum, regardless of whether they use their own name or a pseudonym, or otherwise post the Company's information on the Internet (see our **Social Media Policy** for more information.) All Company emails, voicemails and other communications are presumed confidential and should not be forwarded or otherwise disseminated outside of the Company, except where required for legitimate business purposes.

Employees are required to observe the provisions of any other specific policy regarding privacy and confidential information that the Company may adopt from time to time.

SHARING INFORMATION WITH THIRD PARTIES

Employees sometimes must disclose our confidential information in the course of performing their jobs. If an employee needs to disclose confidential information belonging to the Company, they first must ask our Compliance Officer to work with the other party to sign an approved non-disclosure agreement ("**NDA**").

If a third party has disclosed confidential information to you or the Company under an NDA, we must comply with the terms of the NDA and limit our use of the confidential information to the specific purpose for which it was intended.

You should never attempt to obtain a competitor's confidential information improperly. This includes asking another employee to disclose confidential information they received while working at another company.

If you obtain another company's confidential information accidentally or from an unknown source, it may be unethical or even illegal to use the information. You should immediately contact our Compliance Officer to determine how to proceed.

PROTECTION AND PROPER USE OF COMPANY ASSETS

All employees and directors are expected to protect the Company's assets and ensure their efficient use for legitimate business purposes. Theft, carelessness and waste have a direct impact on the Company's profitability. The Company's property, such as computer equipment, buildings, furniture and furnishings, office supplies and products and inventories, should be used only for activities related to employment, although incidental personal use is permitted.

Employees should bear in mind that the Company retains the right to access, review, monitor and disclose any information transmitted, received or stored using the Company's electronic equipment, with or without an employee's or third party's knowledge, consent or approval.

Employees must immediately report any misuse or suspected misuse of the Company's assets to their supervisor or the Compliance Officer.

MEDIA CONTACTS AND PUBLIC COMMUNICATIONS

It is the Company's policy to disclose material information concerning the Company to the public only in accordance with its communications and disclosure guidelines and policies, in order to avoid inappropriate publicity and to ensure that all such information is communicated in a way that is reasonably designed to provide broad, non-exclusionary distribution of information to the public. For more information, see the Company's ***Corporate Communications Policy***.

COMPLIANCE STANDARDS AND PROCEDURES

COMPLIANCE RESOURCES

The Company has an obligation to promote ethical behavior. Every employee is encouraged to talk to his or her supervisor, managers and other appropriate personnel when in doubt about the application of any provision of this Code.

In addition to fielding questions with respect to interpretation or potential violations of this Code, the Compliance Officer is responsible for:

- Investigating possible violations of this Code;
- Training new employees in Code policies;
- Conducting annual training sessions to refresh employees' familiarity with this Code; and
- Otherwise promoting an atmosphere of responsible and ethical conduct.

The most immediate resource available to employees for matters related to this Code is their supervisor. The supervisor may have the information requested or may be able to refer the question to another appropriate source. There may, however, be times when employees prefer not to go to their supervisor. In these instances, employees should feel free to discuss their concerns with the Compliance Officer. If an employee is uncomfortable speaking with the Compliance Officer because he or she works in that employee's department or is one of his or her supervisors, the employee may contact the Chairperson of the Audit Committee.

CLARIFYING QUESTIONS AND CONCERNS; REPORTING POSSIBLE VIOLATIONS

EMPLOYEE REPORTING

If an employee becomes aware of or suspects that unethical or illegal conduct has occurred or is about to occur, the employee should discuss the matter promptly with his or her supervisor or the Compliance Officer, as discussed in **Compliance Resources** above. Even the appearance of impropriety could be very damaging to the Company. Employees that are aware of a suspected or actual violation of Code standards by others have a responsibility to report it.

All information regarding suspected ethical violations or unlawful activity will be received on a confidential basis. While complete confidentiality cannot be guaranteed, confidentiality will be maintained to the extent possible in conducting internal investigations and, where action is warranted, in carrying out disciplinary measures. Employees are assured that they may report unethical conduct without fear of retribution. The Company will not tolerate adverse actions being taken against an employee for reporting violations of law or the Company's policies, or for participating in internal investigations. See the Company's **Whistleblower and Complaint Policy**.

Please note that nothing in this Code (nor any other Company policy or agreement) limits, impedes, or restricts your ability to contact, report to, or file a charge or complaint with, the U.S. Securities and Exchange Commission, or any other federal, state, or local government agency or commission ("Government Agencies") at any time. This Code also does not limit your ability to participate and/or assist in any investigation or proceeding that may be conducted by any Government Agencies, including providing documents or other information without notice to the Company. Nothing in this Code limits your right to seek and/or receive an award for information provided to any Government Agencies or prohibits you from providing truthful information in response to a subpoena or other legal process.

COMPLIANCE OFFICER INVESTIGATION

Supervisors must promptly report any complaints or observations of Code violations to the Compliance Officer. The Compliance Officer will investigate all reported possible Code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances. Employee cooperation in the investigation will be expected. As needed, the Compliance Officer will consult with outside legal counsel, the human resources department, the Audit Committee and the full Board of Directors, if necessary.

RESPONSE TO VIOLATIONS

If the investigation indicates that a violation of this Code may have occurred, the Company will take such action as it deems appropriate under the circumstances. If Company determines that an employee is responsible for a Code violation, he or she will be subject to disciplinary action up to, and including, termination of employment and, in appropriate cases, civil action or referral for criminal prosecution. Appropriate action may also be taken to deter any future Code violations.

NO RETALIATION

We will not tolerate retaliation against any person raising a concern or participating in any investigation in good faith.

IDENTIFICATION OF RESPONSIBLE PARTIES; ANONYMOUS REPORTING PROCEDURES

Employees are responsible for promptly reporting any issue or concern that they believe in good faith may constitute a violation of this Code or any other Company policy. Employees who wish to anonymously submit a concern or complaint regarding a possible violation of this Code should follow the procedures outlined in the Company's Whistleblower and Complaint Policy.

NO RIGHTS CREATED

This Code is a statement of fundamental principles, policies and procedures that govern the Company's employees, officers and directors in the conduct of the Company's business. It is not intended to and does not create any legal rights for any supplier, partner, competitor, stockholder or any other person or entity.

ADMINISTRATION, MODIFICATION AND AMENDMENT

This Code shall be reviewed periodically by the Board of Directors and the Nominating and Corporate Governance Committee and shall be updated as deemed appropriate or necessary by the Board of Directors or the Nominating and Corporate Governance Committee. Our Board (including, with respect to waivers, a committee of our Board if allowed under the rules of the securities exchange on which our securities are listed) reserves the right in its sole discretion to modify or grant waivers to this Code. Any amendments or waiver may be publicly disclosed if required by applicable laws, rules and regulations.

THANK YOU...

...for your commitment to using our Code as an ethical resource and conducting business consistent with our vision and values. This Code is not an exhaustive list of every policy you need to know for your individual role or every situation you may face; it is a resource that provides guidance and information that enables you to find or arrive at the right answer or to seek help when needed.

If you are ever not sure what is the right thing to do, ask! Ask your supervisor, our Chief Compliance Officer or any member of the Executive Leadership Team.

It's critical we live our Code during these exciting times at Anaptys as we take on big scientific challenges to develop best-in-class immune cell modulators and work to build a sustainable company focused on transforming the lives of patients with autoimmune and inflammatory diseases.