agios

Agios Pharmaceuticals, Inc.

Code of Business Conduct and Ethics









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A Letter from Our Chief Executive Officer

Dear Agios Team

Our work is guided by a shared purpose: to rewrite the stories of rare disease patients and their loved ones – stories too often marked by uncertainty, delayed diagnoses, and a lack of available treatments. Our vision is to redefine the future of rare disease treatment, transforming those experiences through scientific innovation and the pursuit of new medicines.

Bringing that vision to life requires that we hold ourselves to the highest standards. Our Code of Business Conduct and Ethics defines those shared principles, guiding our decisions, shaping our actions, and strengthening a culture rooted in integrity and trust. No matter our role, we are united in our commitment to act lawfully, ethically and respectfully.

I ask that you read the Code carefully, commit to its principles, and apply them in your daily work. Should questions arise, I encourage you to speak with your manager, the Compliance team, HR, or a member of the Leadership Team. If you see something that does not align with our standards, the Code outlines resources to help you raise concerns. We do not tolerate retaliation against anyone who speaks up in good faith.

For Agios, integrity is inseparable from our vision. Patients trust us not only to advance science, but to do so in the right way – every single day.

Thank you for your continued commitment to our patients, our communities, and each other.



Brian Goff
Chief Executive Officer, Agios



Brian Goff
Chief Executive Officer

"Our Code of Business Conduct and Ethics is more than just words on a page; it is a living document that guides us in our work on behalf of patients and is ultimately a source of pride for all of us."

Living Our Values

At Agios, our shared values and community-centric culture promote collaboration, contribution, engagement and high regard for others' points of view.

We foster a work environment in which every person feels empowered to bring their whole selves, where we trust one another and hold ourselves accountable for our actions. We also grow supportive and trusting relationships with patients, caregivers and collaborators – knowing that together, we make a bigger impact than we ever could alone. We know that patients are counting on us, and we're driven by our sense of urgency to help them. This foundation and commitment to always doing the right thing helps our people push the boundaries of science and create transformative medicines for rare and genetically defined diseases.

Aim High

We're here to do great things in partnership with patients. We set the bar high for ourselves, and we keep working to raise it. At our core, we're guided by a deep respect for the science and a commitment always to act with the utmost integrity.

Come Together

We foster a caring and open community with our team. We grow supportive relationships with patients and caregivers. We build trusting connections with collaborators. Together, we make a bigger impact than we ever could alone.

Embrace Differences

Because opportunities and insights come from anywhere and anyone, we honor all voices and encourage honest dialogue. We learn equally from success and failure, bringing an open mind and a flexible approach to everything we do.

Bring Your Whole Self

We know we make the biggest impact when each of us can contribute and lead in our own way. So, we honor everything that makes you uniquely "you" – and we never, ever tolerate jerks. At the end of the day, we aim to solve serious problems and have fun doing it.

Blaze New Trails

We ask the tough questions that lead to groundbreaking scientific advances. We nurture a creative mindset and resourceful approach that spark life-changing innovations for patients. No matter where our journey takes us, we keep challenging ourselves and our colleagues to find new and better ways to realize the potential of our science.

Understanding Our Responsibilities

As we undertake our mission to help patients and their families, we have a responsibility to conduct business with highest integrity and in compliance with all applicable laws and regulations. This Code of Business Conduct and Ethics (the "Code") sets expectations for the standards to which we should adhere when acting on behalf of Agios.

Adherence to the Code

The Code applies to all employees, officers and directors in all of its locations, affiliates, and subsidiaries, each of whom must adhere to its provisions, including the obligation to reporting of suspected violations. Certain business partners, such as agents, consultants, distributors, suppliers, vendors, independent contractors and temporary employees, are also expected to conduct themselves in a manner consistent with the principles of this Code. Managers who oversee external business partners are responsible for ensuring that they are aware of and understand our standards.

Reading and Understanding the Code

The most current version of the Code is available on the Agios corporate website and will be provided to each new employee, officer and director at the beginning of his or her relationship with Agios and on an annual basis thereafter. Each employee, officer and director shall certify that he or she has received, read and understood the Code and, for annual certifications, has complied with its terms.

Company Policies

The Code is not intended to be an exhaustive description of Agios' policies. Agios has adopted policies and procedures addressing certain topics in the Code in more detail and may adopt additional policies from time to time. Please contact your manager, Human Resources, Legal or Compliance with questions about Agios' policies and procedures.

Understanding Our Responsibilities (continued)

Asking for Help

The Code cannot directly address every scenario that may arise; therefore, employees are expected to use good judgment and common sense when acting.

If you are ever in doubt or have questions about whether a particular activity is consistent with this Code, a company policy or the law, please ask your manager or a representative from Human Resources, Legal or Compliance before proceeding. While there may not always be a quick or easy answer, it is in the best interests of Agios and all of us to ask for help to ensure that all aspects of a particular decision are considered before proceeding.

Since Agios operates in many different countries and jurisdictions, there may sometimes appear to be conflicts between applicable laws and regulations. When you encounter such a conflict, please consult with Legal or Compliance.

Agios Compliance Helpline

(800) 792-8135
www.agios.ethicspoint.com

Reports to the **Agios Compliance Helpline** can be made anonymously in countries where anonymous reports are allowed by law. The helpline is available by phone or by web-reporting tool 24 hours a day, 7 days a week, 365 days a year and is operated by an independent third party contracted by Agios to help ensure anonymity where permissible.

Visit the Ethics Hotline website for all country-specific phone numbers.

Reporting Concerns

You are required to report suspected violations of this Code, company policies or the law. Reports can be made to your manager, a representative from Human Resources, a representative from Legal, a representative from Compliance or the Agios Compliance Helpline.

Manager Responsibilities

Managers at Agios play an important role in shaping the direction of their team's work and overall experience at the company. Managers are responsible for:

- Setting expectations for annual goals, key deliverables and critical competencies
- Providing regular feedback and coaching as part of the overall performance management process
- Serving as a source of company information and providing an open door for feedback
- Setting an example for their teams by demonstrating our values and competencies
- Ensuring any external business partners understand their compliance obligations
- Communicating to employees and business partners about how the Code and policies apply to their work

Understanding Our Responsibilities (continued)

Manager Responsibilities (continued)

Managers are essential in promoting the standards contained in the Code and are often the first point of contact when an employee or external business partner has a question or concern. Managers are expected to take all compliance concerns seriously and create an environment where their teams feel comfortable raising issues. While answers may not be available immediately, managers are expected to listen carefully and are expected to promptly escalate issues and involve Human Resources, Legal or Compliance as needed, and to take appropriate action to address a concern or question.

Many resources exist to support managers in their roles. Additional information and guidance may be obtained on Agios' intranet site, from your manager or from Human Resources.

No Retaliation

Agios prohibits retaliation against anyone for reporting, in good faith, a suspected violation of the Code, a company policy or the law. Retaliation in any form against an individual who reports in good faith a suspected violation (even if the report is mistaken), or who assists in the investigation of a reported violation, is itself a violation of this Code. Acts of retaliation should be reported immediately to your manager, Human Resources, Legal or Compliance.

Investigations

Human Resources, Legal or Compliance will coordinate the investigation of any reports of alleged violations of the Code, a company policy or the law. You are expected to fully cooperate with any such inquiry or investigation.

Disciplinary Action

Failure to (1) adhere to the provisions in this section and the following sections of the Code, (2) comply with company policies or with the law or (3) report suspected violations or cooperate with investigations may result in disciplinary action up to and including termination of employment.

It is the Company's policy to fully cooperate with all government investigations or inquiries in a direct, honest and truthful manner.

Some Questions to Consider Before Taking Action in a Challenging Situation:

Is the action consistent with the Code, the law and our company policies and procedures?

Does something feel wrong about taking the action?

How would the medical community or patients view this action?

If this action were reported on the front page of the Wall Street Journal, how would it look?

Maintaining a Respectful and Safe Work Environment

None of what we aspire to be and do at Agios is possible without our employees. We work best when we embrace diversity, foster an inclusive culture and create a safe environment free of harassment.

Preventing Discrimination and Harassment

Agios embraces people with different backgrounds, experiences, abilities, skills and beliefs. We believe these varying perspectives help our company succeed. Agios is committed to the principles of equal employment, diversity, inclusion and respect.

Agios does not tolerate discrimination against or harassment of anyone who works for or with Agios (including employees, customers and suppliers) on the basis of sex (including pregnancy, childbirth or related medical conditions), race, color, religion, ethnicity, national origin, ancestry, age, physical or mental disability, veteran status, marital status, sexual orientation, gender identity, genetic information or any other basis protected by applicable local, state or federal laws.

If you witness or experience conduct that appears to be discriminatory or harassing, please report the situation to Human Resources. Managers must report any instance of harassment or discrimination of which they become aware.

Ensuring Workplace Safety

Agios is committed to ensuring a safe and healthy work environment, free of threats to the health, safety, and well-being of our employees and visitors.

You are required to comply with Agios' established safety rules and procedures, as well as applicable laws and regulations regarding workplace safety. You have a responsibility to promptly report any unsafe situations, accidents or injuries whether you are directly involved or are a witness. Please contact Facilities with any questions about workplace safety rules and procedures.

Agios prohibits violence in the workplace. If you witness or experience violence or intimidation, or threats of violence or intimidation directed at you or someone else in the Agios community, please report the situation to Human Resources. The use, sale or possession of weapons in the workplace is also prohibited.

While modest and responsible consumption of alcoholic beverages at business functions and meals is permitted, your judgment, professionalism or physical abilities should never be impaired by alcohol or drugs when carrying out your job duties in or outside the workplace.

Please refer to the Guide to Navigating Agios (Agios' employee handbook) for more information about Agios' policies on workplace safety.

Maintaining a Respectful and Safe Work Environment (continued)

Responsible Use of Company Assets and Technology

Agios may provide employees with tools such as office space, supplies, computers, an internet connection, and electronic and other tools to support effective and efficient performance of their job responsibilities.

You are responsible for using these resources in a professional, ethical and lawful manner and appropriately safeguard them including against cyber-related attack, loss, theft, damage, inappropriate use or other forms of fraud or abuse. While you may use these resources for personal use on a limited basis, personal use should be kept to a minimum and should not interfere with the performance of your job responsibilities

Agios' electronic systems should never be used for inappropriate purposes including, for example, to view or transmit profane, vulgar or sexual content or any other material that would be offensive to the average person. All information stored, transmitted, received, or contained in Agios' electronic systems and devices is Agios' property and, to the extent permitted by law, should not be considered private.

Agios expressly reserves the right to monitor, access and review employee use of Agios' electronic systems and devices (including its Internet connection, e-mail, IM, or voice mail systems, and e-mail or IMs sent or received through personal or web- based accounts) to the extent permitted by law.

All employees and business partners must help protect these electronic systems, devices, and other resources, as well as any confidential and proprietary information stored on them.

When using AI-enabled tools for company business, use only approved tools and accounts, protect confidential and personal data, and apply appropriate human judgment and oversight. You are responsible for verifying accuracy and ensuring outputs comply with company policies and applicable law. AI generated outputs may constitute business records and must be handled in accordance with Agios' records retention and confidentiality requirements.

All employees and business partners are responsible for complying with Agios' information security policies and procedures and for remaining vigilant against potential vulnerabilities and threats from both inside and outside the corporate environment.

Please refer to the Guide to Navigating Agios for more information and Agios' policies and procedures.

Preserving Employee Privacy

Agios respects the privacy of all its employees, job applicants, customers, suppliers and others. Agios is committed to handling personal data responsibly and in compliance with all applicable privacy laws and company policies, including our privacy and records retention policies.

Doing Business Ethically and Legally

Each of us is responsible for maintaining high ethical standards and for adhering to the laws and regulations that are applicable to Agios.

Avoiding Conflicts of Interest

We should always act in the best interest of Agios and refrain from engaging in any activity or having a personal interest that presents a "conflict of interest". A conflict of interest occurs when your personal interests (or the interests of your family) interfere or appear to interfere with Agios's interests. Conflicts of interest can arise when you take an action or have an interest that prevents you from performing your job duties and responsibilities honestly, objectively and effectively. Each of us is expected to use good judgment to avoid situations that can lead to even the appearance of a conflict of interest.

It is impossible to describe every potential conflict of interest, which is why communication is critical. You are required to disclose any conflict of interest, or anything that could be perceived as a conflict of interest, to your manager and Human Resources, Legal or Compliance so that the situation can be appropriately managed.

Conflicts of interest could include, for example:

- Conducting business on behalf of Agios with family members or others with whom you have a significant personal relationship
- Performing services as an employee, officer, director, consultant, advisor or in any other capacity for a competitor of Agios, other than any services performed at Agios' request
- Taking personal advantage of any business or investment opportunity presented to Agios
- Having a significant financial or other interest in a company or person that competes with, does business with or is seeking to do business with Agios, or has family members who have such an interest
- Using your position with Agios to influence a transaction with a supplier or customer in which you or your family members have a personal interest
- Hiring a family member in your reporting line or function, or by maintaining intimate relationships with employees in your reporting line or function (or in another function with which you work closely) or with a business partner, supplier, or customer

Finally, Agios' Related Person Transaction Policy requires review and approval of certain transactions, arrangements or relationships with Agios in which any of its executive officers, directors, director nominees or holders of 5% or more of its outstanding stock (or their immediate family members) has a material interest. Please contact Legal with any questions about the Related Person Transaction Policy.

Doing Business Ethically and Legally (continued)

Handling Gifts and Entertainment

The giving or receiving of cash or cash equivalents, gifts, entertainment or other benefits by individuals in their capacity as representatives of Agios may create a real or perceived conflict of interest and, in some cases, may violate applicable laws or regulations. To avoid these risks, neither you nor your family members may accept cash, gifts, entertainment or other benefits from customers, suppliers or anyone doing or seeking to do business with Agios, except for items of insignificant value that are customary and appropriate in a business context (such as a small holiday gift basket).

Common sense should prevail when engaging in business entertainment on behalf of Agios. Acceptable entertainment is infrequent, modest, intended to serve legitimate business goals and in compliance with applicable laws and regulations.

The following sections in the Code titled Interactions with Healthcare Professionals and Relationships with Government Officials and Compliance with Anti-Bribery Laws address special considerations for providing items of value or entertainment to healthcare professionals or government officials, both inside and outside of the U.S.

Interactions with Healthcare Professionals

Globally, interactions with healthcare professionals are subject to special laws, regulations and stringent oversight.

These laws and regulations include the prohibition of kickbacks, or the payment of anything of value (including money, gifts, services, entertainment or other items), where at least one purpose of the payment is to improperly influence a decision to obtain or retain business or secure any other improper advantage. A key purpose of these laws and regulations is to protect the independence and objectivity of healthcare professionals treating patients.

Agios prohibits all kickbacks and other improper inducements to healthcare professionals. Put simply, we do not “buy business.” All interactions with healthcare professionals should be professional in nature, based on a legitimate business need, and facilitate the exchange of medical or scientific information, with the goal of benefiting patient care.

You must consult applicable Agios policies and procedures before engaging healthcare professionals to provide services and before providing anything of value to a healthcare professional. Please contact Legal or Compliance with any questions about interactions with healthcare professionals.

Doing Business Ethically and Legally (continued)

Relationships with Government Officials and Compliance with Anti-Bribery Laws

Agios is committed to compliance with anti-bribery laws and regulations wherever it does business, including the U.S. Foreign Corrupt Practices Act, the UK Anti-Bribery Act and similar laws around the globe, that prohibit bribery and corruption. Agios expects all employees, officers, agents, and independent contractors acting on behalf of Agios to strictly abide by these laws. Accordingly, Agios prohibits bribes, kickbacks, and other types of payoffs and benefits, no matter the form, paid to any healthcare professionals, customers, governmental authorities, suppliers, or any other parties, to improperly influence them to obtain or retain a business advantage.

You are prohibited from making, promising, paying, or authorizing, directly or indirectly, any payment of money or anything of value to any other person or organization with the intent to improperly induce the recipient to violate his or her duties, exert improper influence over the recipient, obtain or retain an improper business advantage for Agios, or improperly reward the recipient for past conduct.

Offering or providing money or other things of value to government officials can raise special risks under anti-corruption laws and regulations, and should be approached with heightened caution.

Agios is committed to working fairly and honestly with government representatives and agents, and to complying with governmental requests and processes.

We must all be truthful and straightforward in our dealings with government bodies and may not direct or encourage another employee or anyone else to provide false or misleading information to any government official. Providing gifts, gratuities, or other favors or items of value to government officials is generally discouraged.

It is important to note that many health care professionals outside of the United States are employees or officials of foreign government agencies and other public institutions and, therefore, are considered "government officials." Thus, you should exercise care and caution in business interactions with such health care professionals.

You must consult applicable Agios policies and procedures before engaging government officials to provide services and before providing anything of value to a government official. Please contact Legal or Compliance with any questions about interacting with government officials.

Interactions with Patients and Patient Advocates

At Agios, patients are at the center of everything we do. We are committed to interacting with patients and patient advocates in an appropriate way. You should never provide medical advice to patients and should always refer a patient to his or her physician when medical questions arise.

Interactions with organized patient advocacy groups or individual patient advocates should be conducted with transparency and in a manner structured to ensure the independence of these entities. Please contact Patient Advocacy with questions about interacting with patient advocacy groups.

Doing Business Ethically and Legally (continued)

Promoting Products

Agios is committed to the honest and truthful promotion and marketing of its products and to using accurate and well-balanced scientific information in all of its marketing activities. If you are acting on Agios' behalf in marketing and promotional activities, you must follow Agios' policies and procedures (including its policies on promotional communications) when interacting with healthcare professionals and patients.

When promoting and marketing Agios products, you must:

- always present information that is accurate and balanced, including an accurate statement of safety information which should never be minimized or misrepresented
- never promote products for unapproved uses
- conduct promotional activities only with approved materials
- understand and adhere to the rules governing promotion, including Agios policies and procedures

You should consult Legal or Compliance with questions about the proper promotion of Agios' products.

Engaging in Personal Political Activities

Agios supports your right to engage in the political process, including through personal monetary contributions or by volunteering personal time. However, you must conduct any political activities on your own time and with your own resources. In addition, you may not make political contributions on behalf of Agios or suggest that Agios has provided support.

If you have any questions about engaging in political activities please speak with your manager, Human Resources, Legal or Compliance.

Personal Political Activities Must Be Kept Separate from Work

- Do not make political contributions, directly or indirectly, on behalf of Agios
- Do not lobby on behalf of Agios without approval from Legal and Corporate Communications
- Do not use Agios' name, property, or your job title for personal political activities
- At work, do not solicit donations or try to persuade others to support political parties or candidates

Supporting Fair Competition

Agios must always deal honestly, ethically and fairly with our suppliers, customers, competitors and employees and adhere to all laws and regulations designed to promote free trade and fair competition among businesses. These competition laws (also known as anti-trust laws in the United States) prohibit any conduct, whether through formal contracts or informal discussions, that interferes with fair competition. This conduct may include, but is not limited to, the following types of agreements or discussions: (i) "price fixing" arrangements; (ii) refraining from competing on bids ("bid rigging") with competitors; (iii) market division with competitors; or (iv) boycotting or collectively refusing to deal with certain customers, healthcare professionals or vendors.

Doing Business Ethically and Legally (continued)

In addition, you should never threaten to use Agios' potential market position against a third party, boast about "market power," disparage competing products, or mislead a customer or supplier about a competitor. Although these actions may not necessarily be violations of antitrust laws, they may create an appearance of improper behavior.

Please contact Legal with any questions about whether a particular arrangement complies with competition laws and regulations.

Understanding Insider Trading Laws

As a publicly traded company, Agios must adhere to particular standards to ensure compliance with applicable securities laws and the regulations of the Securities and Exchange Commission (SEC) and similar bodies. To help ensure compliance with these laws and regulations, Agios has adopted an Insider Trading Policy.

What is Insider Trading?

Buying or selling securities based on material non-public information in breach of a fiduciary duty or other relationship of trust and confidence.

"Tipping" others about material non-public information and trading by the "tippee" who received the information.

In the course of your work you may have knowledge of information, whether about Agios or other companies, before that information becomes publicly available to outside investors. While Agios values open communication internally, you must avoid prematurely disclosing any material nonpublic information to outside parties. Material nonpublic information (also known as "inside information") is information about Agios that is not known to the general public and that a reasonable investor would consider important when deciding whether to buy, sell or hold Agios' securities.

Similarly, you may not buy, sell, or engage in any other transaction with respect to any of the securities of Agios (subject to certain exceptions outlined in the Insider Trading Policy) or any other company while in possession of material non-public information about Agios or such other company. Doing so is both unethical and illegal.

You must also refrain from providing material non-public Agios information to people outside of Agios (a practice referred to as "tipping") unless it serves a legitimate business purpose and the disclosure of such information has been properly authorized and appropriate confidentiality protections are in place.

These topics are addressed in more detail in the Insider Trading Policy. If you have any questions about whether a proposed transaction in Agios securities might be a violation, or any questions about the Insider Trading Policy, please consult Legal.

Doing Business Ethically and Legally (continued)

Financial Integrity

As a public company, Agios has an obligation to provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with or submitted to the SEC and in other public communications.

We are all responsible for honestly and accurately reporting all business transactions. All books, records and accounts must be maintained according to all applicable regulations and standards and must accurately reflect the true nature of the transactions they record. Agios' financial statements must conform to generally accepted accounting rules established by Agios' accounting policies. The making of any false, misleading or artificial entries on any Agios business record including, but not limited to, financial reports, test reports and time reports, is strictly prohibited.

If you have questions about Agios' accounting, internal accounting controls or auditing processes, please contact Finance or Legal.

Dealing with Independent Auditors

You must always make truthful, complete and accurate statements regarding any audit, review or examination of Agios' financial statements or the preparation or filing of any document or report with the SEC. It is prohibited to (directly or indirectly) coerce, manipulate, mislead or fraudulently influence any independent public or certified public accountant conducting an audit or review of Agios' financial statements.

Maintaining Records

You are required to follow all applicable laws, regulations, policies and procedures regarding the creation, maintenance, access rights, storage and destruction of Agios' business records. It is Agios' policy to retain records for as long as they are required and in the manner required to meet legal, regulatory, administrative and operational requirements. If it should ever become apparent that records of any type will be required in connection with a lawsuit or government investigation, all relevant records should be preserved, and ordinary disposal or alteration of records pertaining to the subject of the litigation or investigation should be suspended. If you ever have any questions about whether particular records under your control should be preserved because they might relate to a lawsuit or government investigation, please contact Legal.

Demonstrating Our Commitment to Safety and Quality

As part of our commitment to the well-being of patients, Agios is committed to developing and manufacturing the highest quality products in accordance with Good Clinical Practices, Good Manufacturing Practices and applicable laws and regulations. Agios has a continuing responsibility to review information that it learns about its products and to report safety information, including certain information relating to adverse events and quality complaints, to applicable regulatory authorities.

Clinical Research

Agios is proud of its efforts to help patients through clinical research. To ensure adherence with all laws, regulations and our own commitment to patients, Agios follows all review and approval procedures required by applicable laws and regulations before initiating clinical research. Agios protects patient safety and well-being through appropriate informed consent procedures and Good Clinical Practices.

Reporting Adverse Events

An adverse event is any untoward medical occurrence in a patient or clinical trial subject who uses an Agios product. Adverse events can include when someone:

- experiences an unexpected side effect [or benefit] from a medication
- experiences a lack of effect from a medication
- misuses or abuses a medication
- is exposed to a medication during pregnancy or lactation

In accordance with applicable Agios policies, you must report adverse events and other safety events to the Agios Medical Information Call Center or medinfo@agios.com as soon as possible or within 1 business day (but no later than 3 calendar days) of awareness, even if you are not sure whether there is a cause and effect relationship between the use of the product and the adverse event.

Reporting Quality Complaints

Product complaints are any written, electronic, or oral communications that suggests a deficiency relating to the identity, quality, durability, reliability, safety, effectiveness or performance of an Agios product (including its packaging or labeling).

In accordance with applicable Agios policies, you are responsible for reporting product complaints to Quality Assurance within 1 business day (but no later than 3 calendar days) of receipt of information about a product complaint.

Animal Welfare in Research Applications

Agios is committed to conducting animal research in a responsible, humane and ethical manner and is dedicated to the reduction, replacement, and refinement of animal use within in vivo applications. All animal research is performed in full accordance with institutional, local and federal regulatory standards.

Communicating About Agios and Our Work

Information is an especially important asset to Agios. How we communicate – and refrain from communicating – about Agios' proprietary and confidential information and the information of others is critical to maintaining our competitive advantage and to meeting our legal obligations.

Handling Confidential and Proprietary Information

We each have an obligation to maintain the privacy and security of Agios' confidential and proprietary information.

Confidential information is information that Agios considers private and that is not common knowledge outside Agios, such as Agios' business strategy, future plans, financial information, contracts, personnel information, technical or scientific information about current or future research or other information that Agios deems confidential. Proprietary information is information that Agios owns, develops, pays to have developed, or to which it has an exclusive right. Maintaining the confidentiality of confidential and proprietary information is vital to Agios' ability to achieve success and maintain its competitive position in the industry.

We must all maintain the confidentiality of confidential information that is related to Agios or other companies, including our suppliers and customers, except when disclosure is authorized by a supervisor or legally permitted in connection with reporting illegal activity to the appropriate regulatory authority. Unauthorized disclosure of any confidential information is prohibited.

You must not share proprietary information with anyone not entitled to know for a legitimate business reason; this includes fellow employees, spouses, other family members, and friends. You are also required to maintain the confidentiality of Agios' intellectual property, which includes, but may not be limited to, any patents, trademarks, copyrights, and use of rights licensed by others. We also respect the intellectual property belonging to third parties. It is Agios' policy to not knowingly infringe upon the intellectual property rights of others.

To avoid inadvertent disclosure of any confidential or proprietary information, you should avoid discussions of Agios information in public places, such as elevators, public transportation or in restaurants. Any access to confidential or proprietary information given to a third party for a legitimate business reason must be provided under a confidentiality agreement approved by Legal.

The obligation to protect Agios' confidential and proprietary information continues on and off company premises, and during and after employment with Agios.

If you have any questions about whether something is proprietary or confidential, please contact Legal.

Communicating About Agios and Our Work (continued)

Protecting Privacy

We have a responsibility to protect personal information gathered from employees and individuals with whom we work, including consumers, healthcare professionals, clinical trial subjects and patients. This information should be collected only for legitimate business purposes and access should be restricted on an "as needed" basis. Any third party with whom we share this information should be contractually obligated to protect it. Employees responsible for the collection and storage of such information must fully comply with local laws, regulations and company policies and take appropriate precautions to safeguard personal information. Any employee who becomes aware of a breach of the privacy or security of such information should promptly notify Legal.

Agios Compliance Helpline

(800) 792-8135
www.agios.ethicspoint.com

Reports to the **Agios Compliance Helpline** can be made anonymously in countries where anonymous reports are allowed by law. The helpline is available by phone or by web-reporting tool 24 hours a day, 7 days a week, 365 days a year and is operated by an independent third party contracted by Agios to help ensure anonymity where permissible.

Visit the Ethics Hotline website for all country-specific phone numbers.

Communicating with External Parties

Only those individuals who are officially authorized to speak as representatives of Agios may speak with the media, investors and analysts on behalf of the company. Those authorized individuals include the CEO, CFO, Head of Investor Relations, Head of External Communications or any other person approved by an authorized individual.

Individuals who are not specifically authorized to speak on behalf of Agios must not give the impression that they are speaking on behalf of the company through any communication channels that are public or may become public. Such communication channels include, but are not limited to, social media sites, online forums, blogs, chat rooms, websites, discussions with journalists (including from trade publications) and letters to the editor.

If you are not authorized to speak on behalf of Agios and you are contacted by a member of the media or by an investor or analyst, please refer media inquiries to the Head of External Communications and investor inquiries to the Head of Investor Relations. Please also let the Head of External Communications know if you plan to participate in any trade conferences, interviews for trade articles or similar activities where your role at Agios may be mentioned.

Communicating About Agios and Our Work (continued)

Waivers and Other Matters

All employees, officers and directors are obliged to follow the provisions of the Code. Generally, waivers will not be granted and exceptions will be made only for good cause. Any waiver for a director or executive officer must be approved by the Board of Directors. Any waiver for any other employee must be approved by the Chief Legal Officer. Any waivers will be disclosed as may be required by applicable law or exchange listing standards.

Agios reserves the right to amend, alter or terminate this Code at any time for any reason.

The Code is not an employment contract between Agios and any of its officers, employees or directors.

Reminder about Reporting Obligations and Resources

Please remember that an issue cannot be addressed unless it is brought to someone's attention. If you have a question about what to do in a certain situation, or if you suspect any illegal or unethical behavior, you should contact your manager, a representative from Human Resources, a representative from Legal, a representative from Compliance or the Agios Compliance Helpline.

Thank You

Thank you for taking the time to read and understand Agios' Code of Business Conduct and Ethics. By living our values and by undertaking the shared responsibilities described in the Code, we all contribute to Agios' ultimate mission to create groundbreaking therapies for the patients who need them.



Golie, living with sickle cell disease, and Sarah Gheuens, M.D., Ph.D., Chief Medical Officer and Head of R&D, Agios



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