



Code of Conduct

Making it happen the right way

ENTER



Introduction From Paul

*This is the Galapagos Code of Conduct, in which we reflect on what **making it happen the right way** means to us.*

Whether you are a Galapagos employee, director, officer, supplier or partner, our Code of Conduct has been created to **help and inspire you**. Regardless of seniority, position or rank, we each make a commitment to one another to be bound by the principles of this Code. By adhering to these principles, each one of us can end our day knowing that the others would be proud of how we have acted.

Our carefully selected supply chain and network of external business partners play a key role in helping us to make it happen. We therefore hold them to the same high ethical standards as those which we apply to ourselves and require them to conduct their operations in a way that is aligned with the principles set out in our Code.

Our Code of Conduct is like a compass, it will help you navigate your journey at Galapagos and steer you in the right direction. **Let it be your starting point** in helping you to make it happen the right way.



We aim to transform patient outcomes through life-changing science and innovation for more years of life and quality of life. Our Code of Conduct will help each of us to achieve this vision with ethics and integrity at the heart of everything we do.



Paul Stoffels
Chief Executive Officer



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CHAPTER 1

First and foremost, we work with and for our **Patients**. They are our first thought in every decision we make. ➡

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We are proud of the way we do business. We are **ethical**. We are **honest**. We are **transparent**. ➡

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We are responsible corporate citizens. Our actions are thoughtful and considered. ➡

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We show courage in the face of adversity. We **speak up** for what is right and we **listen** when someone speaks. ➡

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We believe that there is strength in individuality and diversity. **We do not tolerate harassment or discrimination** of any kind. ➡

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We feel **empowered** to make the right choices and we therefore hold ourselves **accountable** for our actions. ➡



Chapter 1

*First and foremost, we work with and for our **Patients**. They are our first thought in every decision we make.*



We must not only imagine a better future for patients; we must work consistently: make it happen to make a difference and do it the right way to harvest meaningful and lasting results. We must prioritize humanity and quality above all.



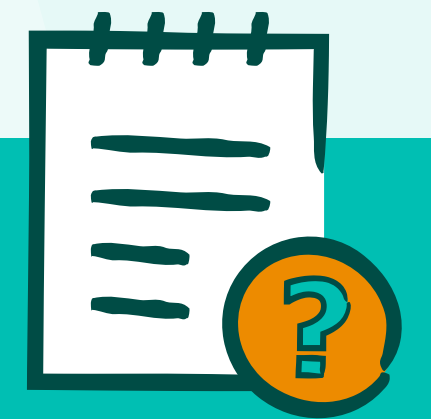


Promise: *We put Patients first. Always.*

- ✓ Our Patients are our North Star. Their unmet needs are our motivation.
- ✓ We will make it happen by imagining a better future for patients and prioritizing humanity and quality above all. We will make a difference in the right way in order to achieve meaningful and lasting results.
- ✓ Whether in relation to clinical studies, research and development or working with our partners, such as Healthcare Professionals or Patient Organizations, the safety and wellbeing of our Patients come first.
- ✓ We listen to our Patients, in order to better understand their needs and preferences.
- ✓ We treat our Patients with empathy, compassion, and care.
- ✓ Any information we share about our products is accurate, balanced, fair, objective and substantiated.
- ✓ We do not share off-label information with Patients and if ever we are approached by Patients for information on their treatment, we direct them to their Healthcare Professional.
- ✓ Complaints or concerns that we receive about our products will be dealt with as a matter of urgency.
- ✓ We support Patient Organizations to achieve better outcomes for our Patients. In doing so, we respect the independence of the Patient Organizations we work with and will never attempt to unduly influence them.
- ✓ We are committed to working with Patient Organizations at the highest levels of transparency and ethical standards.
- ✓ We recognize the trust that Patients place in us. We only collect or use their information for valid reasons and are transparent about the purpose for which we are doing this.
- ✓ We protect Patient privacy and data at all times.

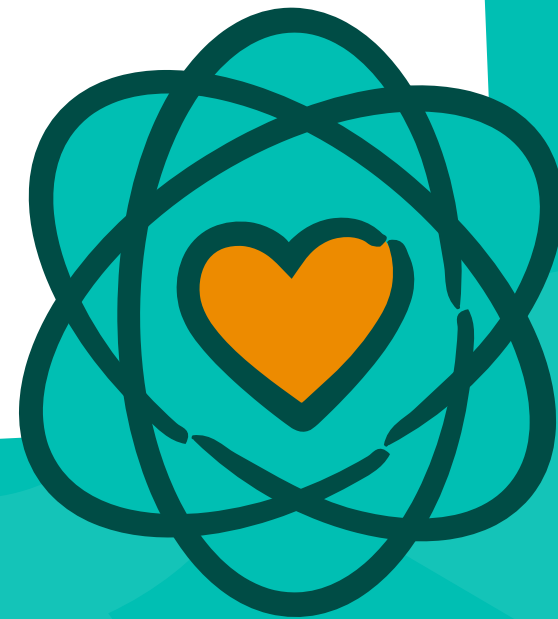
NEED MORE GUIDANCE?

Access the Galapagos Patient Partnership Charter [here](#) ➔



Chapter 2

*We are proud of the way we do business. We are **ethical**. We are **honest**. We are **transparent**.*



At Galapagos, we are ambitious, pioneering and resilient. The thing that underpins all of this? We hold our principles above profits. This is making it happen the right way.

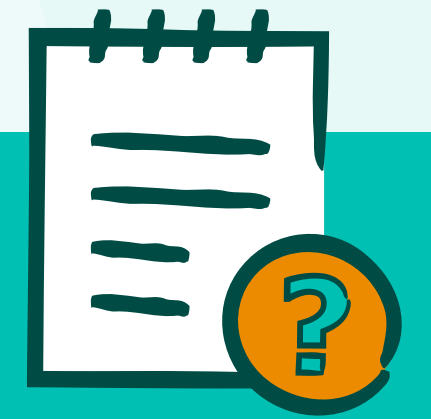




Promise: We act *ethically* and with *integrity* and in accordance with our business conduct principles in everything we do.

- ✓ We recognize the harm that bribery and corruption cause, often to the most vulnerable people in society. Therefore, **our position is simple.**
- ✓ We do not offer, give, demand or accept any financial or other favor to, or from, any person in order to obtain an unfair advantage. It does not matter what the situation is, who is involved, or the value.
- ✓ We do not ask third parties to do this on our behalf and do not work with third parties that do not apply the same standards.
- ✓ When we work with external partners such as Healthcare Professionals, Patient Organizations, Patients or Government Officials, it is for the purpose of achieving better outcomes for our Patients.
- ✓ We will never attempt to unduly influence any of our external partners and we only contract their services where there is a genuine and legitimate need to do so.
- ✓ We only pay Fair Market Value for such services.
- ✓ We are ambitious, pioneering and resilient but we hold our principles above profits.
- ✓ We understand that conflicts of interest can be damaging to the company and also to our own reputations. Therefore, we exercise good judgment to avoid situations where there may be, or even appear to be, an actual or potential conflict between our personal interests and the interests of Galapagos.
- ✓ Where it is not possible to avoid a potential conflict, we will disclose this to our manager or to our Compliance & Ethics business partner so that together, we can discuss how it can be managed appropriately and transparently.

NEED MORE GUIDANCE?



Access the Galapagos Governance Information page [here](#) ➔

Access the Galapagos Anti-Bribery and Anti-Corruption Policy [here](#) ➔

Access the Galapagos Declarations of Interest Policy [here](#) ➔

Chapter 3

We are responsible corporate citizens. Our actions are thoughtful and considered.



Making it happen the right way is not always easy; sometimes the hardest thing and the right thing are the same.





Promise: *We act in accordance with the prudent person principle.*

- ✓ We play fair.
- ✓ Whether in person, on the phone or online, we communicate responsibly and with care because we understand that the way in which we say something is as important as what we say.
- ✓ We will do the right thing, even when it is the more difficult path.
- ✓ We think before we speak or act.
- ✓ We are honest and transparent in all our interactions and we never share information that is misleading, unbalanced, or inaccurate.
- ✓ We comply with all laws, regulations and industry ethical codes that apply to us.
- ✓ We comply with all laws and regulations in relation to human rights and modern slavery and expect the same of those companies that form part of our supply chain.
- ✓ We comply with all laws and regulations in relation to market abuse and insider trading, as well as with Galapagos' Dealing Code.
- ✓ We comply with all laws and regulations related to employee health, safety & wellbeing and are committed to minimizing any negative environmental impact our operations may have and to actively reduce our environmental footprint. Environment, health and safety (EHS) is everyone's responsibility; we actively participate in our EHS programs and share our ambition to continuously improve. We expect the same standards of behavior from others acting on behalf of Galapagos or forming part of our supply chain.
- ✓ We understand that our stakeholders' trust is hard earned but easily lost. Therefore, we commit to providing materially accurate and reliable information in relation to our financial position and in relation to our operations.
- ✓ We exercise good judgement and perform our responsibilities honestly, ethically and objectively. Our books, records and financial statements are kept up to date and are accurate and reliable at all times. We make any disclosures required of us in a timely manner and present them in a way that is easy to understand.
- ✓ We seek to protect Galapagos' assets. We understand that theft, carelessness and waste have a direct impact on Galapagos' financial performance and so we only use Galapagos' assets and services for Galapagos' legitimate business purposes and not for any personal benefit or the personal benefit of anyone else.
- ✓ We understand that our stakeholders trust and rely on us to process their data in a respectful and compliant way and to protect their privacy and confidential information. We therefore comply with all applicable laws and regulations including the GDPR.
- ✓ We will promote our products only in accordance with the product label ('on-label') and only once we have received the necessary regulatory authorizations ('post licence').

NEED MORE GUIDANCE?

Access the Galapagos dealing Code [here](#) →



Chapter 4

We show courage in the face of adversity. We *speak up* for what is right, and we *listen* when someone speaks.

At Galapagos, we understand that in order for our organization to thrive, we must create an environment in which we all feel safe and empowered to raise our voices if we see something that goes against our values.



At Galapagos, our culture is to embrace diversity and to create a space where it is safe to **speak up**, knowing that we will be listened to, even when this might be difficult. Although regulations and procedures can tell us what to do, in the end it is our own internal compass that directs us towards what feels right, and is the right thing to do.





Promise:
We will help and encourage those brave Galapagos employees and partners who speak up when they see something wrong. We will ensure they are protected. And we will celebrate their bravery.

- ✓ We each have a responsibility to speak up when we see something wrong. Therefore, our process for reporting a concern is straightforward, clear and easy to access.
- ✓ All reports are taken seriously and managed in accordance with our robust investigation procedures.
- ✓ Where possible, anyone reporting a concern will be kept updated and the matter will be dealt with confidentially, promptly and fairly.
- ✓ We encourage anyone reporting a concern to let us know who they are as this will help us investigate the matter. However, if requested, the details of anyone reporting a concern can be kept anonymous.
- ✓ We do not tolerate retaliation in any form, against anyone who makes a legitimate report.
- ✓ We are proud of anyone who speaks up for what is right and wherever we can, we will recognize their bravery.



Promise:
We nurture an environment in which every voice is heard.

- ✓ Regardless of seniority, role or position, at Galapagos **every opinion matters**. Each idea that goes unshared is a lost opportunity and so, we push ourselves and encourage each other to **raise the bar** and **challenge the status quo**.
- ✓ We understand that real innovation comes from a diverse range of ideas and so, at Galapagos, we speak our minds and make it safe for everyone to use their voices.
- ✓ We understand that the leaders of our organization have an important part to play in building a culture in which everyone feels safe to use their voice. Our leaders must listen up and take action when our teams speak up.

Chapter 5

*We believe that there is strength in individuality and diversity. **We do not tolerate harassment or discrimination of any kind.***



We stand up for those who are marginalized, disenfranchised or persecuted. Even if this doesn't impact us personally, at Galapagos we understand that one person's fight for equality, is everyone's fight.





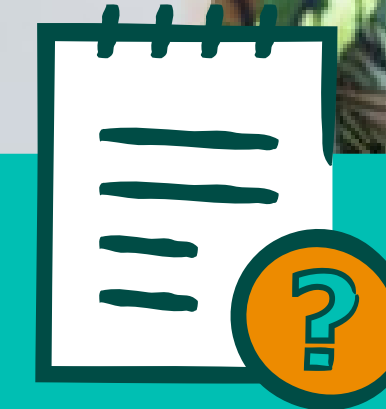
Promise: We foster a diverse and inclusive organization and protect each other against all forms of harassment and discrimination.

- ✓ At Galapagos, our position is simple; we treat one another as we'd wish to be treated, with equity, respect and dignity, enabling everyone to contribute fully and enjoy equal opportunities within the company.
- ✓ We will grow a diverse and inclusive workplace, where people can be their whole and best selves and in which every one of us feels a sense of belonging and community.
- ✓ Whether in relation to race, gender or gender identity, sexual orientation, age, nationality, religion, disability, appearance, political opinion, national extraction, social origin, trade union membership, or anything else, we stand united against all forms of harassment or discrimination.
- ✓ The right to freedom from discrimination and harassment extends to all of us. We take care to select vendors and suppliers with whom we work to ensure that they also uphold these standards.
- ✓ We understand that our obligations go further than not discriminating ourselves; if we witness harassment or discrimination, **we speak up.**



NEED MORE GUIDANCE?

Access our Anti-Harassment and Discrimination Policy [here](#) ➔



Chapter 6

We feel **empowered** to make the right choices and we therefore hold ourselves **accountable** for our actions.



When I close my laptop at the end of the day, I feel a sense of both calm and pride. I know that if asked, I could answer any question on how or why I had done or not done something, with clarity and confidence.





Promise: *Whether we get it right or wrong, we are accountable for what we do.*

- ✓ We each have a responsibility to exercise good judgment and we commit to making it happen the right way.
- ✓ With that said, we understand that sometimes failure will be a part of our journey and that our failures as well as our successes, contribute to our growth.
- ✓ Therefore, we take responsibility for our actions and own our mistakes. We acknowledge that if we chose to act in a way which conflicts with the principles of this Code, we will have to face the consequences.
- ✓ We understand that this Code applies to us all, in full. Regardless of seniority, position or rank, our Code will be applied consistently to every single member of the Galapagos team.



Call to Action

As a member of the Galapagos team, I am here to make things happen but only in the **right way**. I will keep this Code close to hand, to guide me if I am ever unsure.

If I can't find the answer I need in this Code, I will **ask**.

I understand that there are other policies, procedures and guidelines that are relevant to my role. I will **read and apply** them because I understand that they exist to protect me, my colleagues, the company **and the patients and societies we serve**.

It is important to me that people trust my integrity and so I will disclose any potential or actual **conflicts of interest**.

I will show courage, even when it is difficult to do so and will always **listen** and **speak up** if I see something wrong.

