



Our Code of Conduct

Every decision. Every day.

Table of Contents

Click on a topic below to view it.

A Message from Our CEO	3	 Treating Others with Respect	16	 Engaging with the Public	30
 Doing the Right Thing	4	Equal Employment Opportunity	17	Marketing Communications	31
Purpose and Scope of Our Code	5	Anti-Discrimination and Anti-Harassment	17	Corporate Communications	31
Personal Responsibility	5	Health and Safety	19	Public Company Disclosure Obligations	32
Seeking Help and Advice	6	 Ensuring Patient Safety	20	Insider Trading	33
Raising Concerns	7	Good Operating Practices	21	Political Activity and Lobbying	34
 Maintaining Integrity	8	Drug Safety and Pharmacovigilance	21	Environmental Stewardship	34
Comprehensive Compliance Program	9	 Operating an Honest Business	23	Resources for Getting Answers	35
Compliance Philosophy	9	Anti-Bribery and Anti-Corruption	24		
 Protecting Our Company	10	Antitrust and Competition Laws	25		
Confidential Information	11	Anti-Slavery Policy	25		
Use of Corporate Systems and Assets	12	Third Party Relationships	25		
Data Privacy	12	Money Laundering	26		
Accurate Business Records	13	Trade Restrictions	27		
Conflicts of Interest	14	Transparency	28		
		Publications	28		
		Patient and Caregiver Interactions	28		
		Patient Organization Interactions	29		



A Message from Our CEO

Dear Colleagues,

As many of you know, I have had the opportunity to support families touched by rare diseases for more than two decades. I have been present when the first patients were successfully treated with new medications for conditions that previously had no therapies, and those moments have deeply impacted me and are part of the reason I founded Ultragenyx. Our goal here is to create those moments for more patients with rare diseases, but the only way we can achieve this is by operating a fair and honest business. This starts with you.

We may be a global company, but “doing the right thing” transcends borders. The Ultragenyx Global Code of Conduct provides important guidelines to support your decisions throughout your business. It encompasses what our Company stands for and our commitment to the highest standards of ethical conduct. If the Code does not address a specific scenario that you are dealing with, please raise your questions and voice your concerns to ensure that the action you decide to take reflects our corporate values and corporate philosophy.

Thank you for pushing each other, and me, to be **courageous** and **generous** with integrity at all times, remain open to **possibility** and **relentless** by exploring scientific curiosities to advance our therapies, and stay **dynamic** while never losing sight of our mission – to make a difference in our patients’ lives. By “doing the right thing” together, we can continue to put our passions to work and make sure that Ultragenyx not only survives but prospers.

Sincerely,

Emil D. Kakkis, M.D., Ph.D.

Chief Executive Officer and President
Ultragenyx Pharmaceutical Inc.



Doing the Right Thing

We are committed to ensuring that every decision and every interaction honors our values and our mission to make a difference in our patients' lives.



Purpose and Scope of Our Code

Ultragenyx is a biopharmaceutical company committed to bringing to patients novel products for the treatment of rare and ultra-rare diseases, with a focus on serious, debilitating genetic diseases. Ultragenyx is a global enterprise headquartered in Novato, CA with regional offices serving Latin America and Europe. As such, this Global Code of Conduct (the “Code”) describes the business practices and fundamental principles that define our organization regardless of geography.

We are committed to maintaining the highest standards of honest and ethical business conduct, and we make this commitment to the patients we treat, our business partners, our customers, our shareholders, our community, the government agencies that regulate our business, and to ourselves.

Our integrity and reputation depend on the honesty, transparency, fairness and integrity of each person associated with us. The Code applies globally to all employees, officers, and directors regardless of position or tenure. It also provides guidance to everyone who conducts business on the Company’s behalf, including business partners, vendors and temporary workers.



The Code can help you keep our core values in mind while conducting business on behalf of the Company, but it should be read in conjunction with (and not instead of) other Company policies and procedures, which may more specifically apply to your geographic region, function, and/or a particular arrangement or activity.

Personal Responsibility

The Code expresses the Company’s expectations of those who act on its behalf. You are required to read, understand, and certify that they will adhere to the ethical standards described in the Code. ***Any violation of the Code can carry serious consequences*** and will result in disciplinary action, up to and including termination of employment.

You also have a duty to report potential or actual wrongdoing.

If you become aware of an actual or potential violation of a law, regulation, policy, procedure or the Code, you have an obligation to report it to a supervisor, Human Resources or the Legal Department.

Alternatively, you may report it anonymously through the Company’s Compliance Hotline at **+1 (866) 862-3064**.

For more information see [Raising Concerns](#) on page 7.

The Company prohibits all forms of retaliation against anyone who makes a report in good faith.

Any waiver of this Code of Conduct for any officer or director requires the written approval of the Company’s Board of Directors. Any waiver as well as the reasons for the waiver shall be disclosed promptly to the Company’s shareholders.



Seeking Help and Advice

The Code does not address every possible situation that could arise. If you are faced with an issue that is not covered specifically by the Code, consider the following questions before you act:

Ethical Decision Making



Actions and non-actions can carry serious consequences. If you have questions or concerns about any of the laws, regulations, or Company policies and procedures that apply to your work, raise them before taking action.

The potential ethical challenges that you may face are too diverse and complex to be addressed exhaustively. Walking through the Ethical Decision Making chart will help you to remember that you are an extension of our Company.

If you still need help or advice after answering these questions, you should contact your supervisor. If you do not feel comfortable speaking with your supervisor or would like further guidance you can always contact the Legal Department. You should feel comfortable coming forward when you know or suspect that our Code, the law or Company policies and procedures are being violated. That's why the Company has zero tolerance for any form of retaliation against anyone who raises a concern in good faith.



Raising Concerns

It is important to speak up about potential or actual violations of the Code, Company policies or procedures, and the law. This includes any unethical or inappropriate behavior. We listen to and take concerns seriously, and are committed to promptly investigating any concerns brought to our attention. Any reported information will remain confidential to the extent possible, and all forms of retaliation against anyone who, in good faith, seeks help or reports known or suspected violation is strictly prohibited.

Retaliation includes, but is not limited to, performing any of the below actions, without non-retaliatory, legitimate business justification:

- Refusing a promotion
- Excluding a colleague from a business activity or project
- Providing a poor or negative performance review
- Berating, insulting or other aggressive behavior against a colleague that makes them uncomfortable or feel threatened
- Demoting a colleague
- Terminating a colleague's employment

There are several ways to raise concerns:

Contact your direct supervisor.

He or she can answer your questions, direct you to others who can answer your questions, and help manage the situation.

Contact the Legal Department directly.

If you do not feel comfortable reporting concerns to your supervisor, you should always feel free to contact the Legal Department.

Contact Human Resources or the General Counsel.

If you do not feel comfortable speaking with your direct supervisor or the Legal Department, you can reach out to Human Resources or the General Counsel directly.

Contact the Ultragenyx Compliance hotline.

The Ultragenyx Compliance hotline is operated by an independent third party and is available 24 hours a day, seven days a week. It is available to anyone within or outside the Company. However, local laws may in some countries limit the types of concerns that can be reported via the Ultragenyx Compliance hotline. There are three ways to raise concerns anonymously:

1. Visit the following website to submit a report online:
<http://www.openboard.info/RARE/>.
2. Email RARE@openboard.info.
3. Call the following phone number to leave a voicemail message (All voicemail messages will be electronically altered/disguised to ensure the confidentiality of your identity.): **+1 (866) 862-3064**.

What does "in good faith" mean?

To speak up in "good faith" means to come forward with a concern that you believe to be true, even if it is later determined that no violation occurred. In "good faith" also means that one should not fabricate or raise issues not based on fact against others. We recognize that speaking up may not be easy, and we want to emphasize that we do not tolerate intimidation or retaliation against anyone who raises a concern, makes a report, or cooperates in an investigation. To be clear, retaliation against anyone who raises a concern or reports a violation in good faith may result in disciplinary action, up to and including termination of employment.



Maintaining Integrity

Our commitment to doing the right thing is supported by our comprehensive compliance program and philosophy.



Comprehensive Compliance Program

To support the Company's business efforts, we have a comprehensive compliance program (the "Program"), led by the Executive Vice President, General Counsel, and the Compliance Counsel. The General Counsel and Compliance Counsel make periodic reports directly to the CEO and Board of Directors and manage the Compliance Committee—a group comprised of senior management from various functional business areas, including Legal, Finance, Human Resources, Quality, Global Clinical Development, Clinical Operations, Program and Portfolio Management, Medical Affairs, and Commercial.

The Program complies with laws and principles applicable to our industry and includes, but is not limited to:

- Written standards of conduct, policies, and procedures;
- Training and education programs for all employees;
- Open lines of communication between the Legal Department and employees, including a process to receive anonymous complaints and concerns;
- Oversight, auditing and monitoring program to identify and address risk; and
- Enforcement of compliance obligations, including disciplinary action for non-compliance.

Compliance Philosophy

Everything we do is driven by our compliance philosophy—shared values that unite us across geographic regions and functional business areas.

CULTURE

We instill a culture that demands ethical behavior starting with the executive leadership team and continuing throughout all departments and levels. We hire and retain only the most ethical individuals for all jobs and functions.

ACCOUNTABILITY

You are responsible for compliance in everything you do. We educate, trust and empower each individual to "do the right thing."

COMMUNICATION

We foster effective lines of two-way communication and encourage you to speak up. Together, we will uphold the Company's reputation and commitment to compliance.

PARTNER

We work together making good decisions to ethically achieve our business mission and Company vision. We appreciate that Compliance is integral to our business.





Protecting Our Company

We use Ultragenyx resources and information responsibly in the pursuit of our mission.



Confidential Information

We deal with many types of confidential information in the course of doing business that must be carefully safeguarded, including non-public information about our company, customers, and business partners.

Protecting this information is essential to maintaining our business relationships and competitive advantage in the marketplace. We all have a duty to both ensure that confidential information is used only for its intended purpose and prevent unauthorized use and disclosure. We require employees to sign a Confidential Information and Invention Assignment Agreement as a condition of employment. In addition, we have strict protocols for handling confidential information, sharing confidential information with a third party,

and the proper disposal of confidential information.

Examples of confidential information include, but are not limited to:

- Information marked “Confidential,” “Private,” “For Internal Use Only,” or with a similar phrase;
- Technical or scientific information relating to current or future products;
- Sales and marketing strategies;
- Earnings and other internal financial data;
- Pricing information;
- Confidential sales data;
- Revenue for a territory;
- Customer Start Forms; and
- Customer lists.



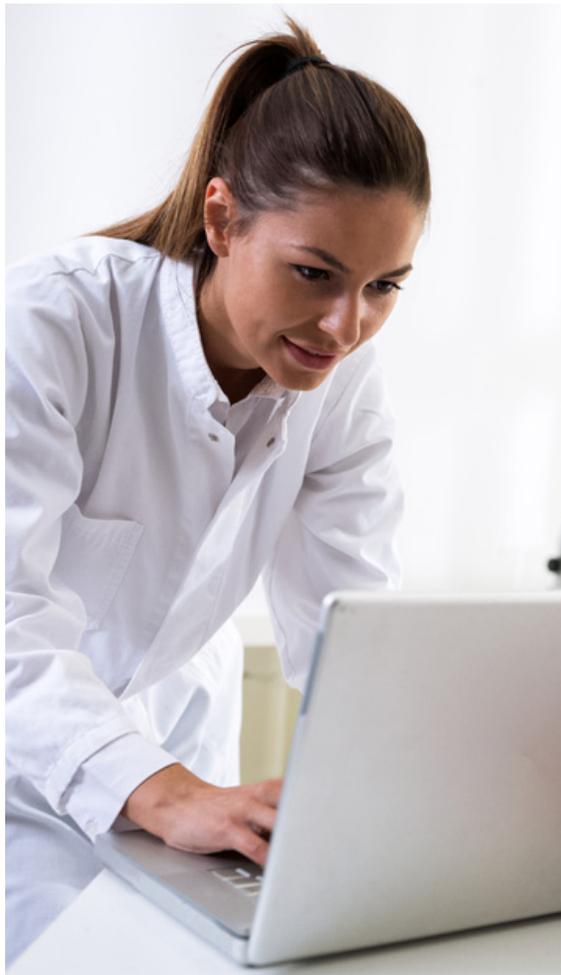
Q: *Sarah and Dawn are sales leaders who just got out of a long meeting where they discussed plans to start marketing to a new physician specialty. They head to the kitchen to grab some coffee and continue to discuss the plans in detail. They are so excited about the plans that they do not notice people walking by them to grab their own drinks and snacks. Is their behavior acceptable?*

A: *No, this is not acceptable behavior. Sarah and Dawn have a responsibility to handle confidential information with care. This includes not discussing confidential information where they can be overheard by others who have no business reason to know about sales and marketing strategies. The people who walked by them could have been employees, vendors, consultants, job applicants, or visitors of an employee. If information about the sales and marketing strategy were to become public, it could cause the Company substantial harm.*



Use of Corporate Systems and Assets

We provide employees with resources and assets to enable employees to perform their work efficiently. These resources and assets are always the property of the



Company and include, but are not limited to: funds, office supplies, equipment, computer hardware and software, office and cellular telephones, furniture, facilities, business records, and customer information, including in certain instances, personal information. **We have a duty to protect Company resources and assets from loss, damage, theft, and misuse.**

We must also ensure that these resources and assets are used responsibly and for authorized business purposes. In some instances, resources and assets may be used for limited personal, non-business purposes, provided it does not interfere with employee work performance or the Company's ability to conduct its business.

Any data or information created, downloaded or shared using the Company's computers, networks, and communications system (e.g., email, voicemail, text messages, pictures, and the Internet) is Company property. We may access, review and monitor Company property at any time. EU citizens will be notified prior to accessing, reviewing and monitoring Company email. The use of Company systems and assets reflects on the Company as a whole, and we will not tolerate its use for illegal, derogatory, or inappropriate behavior, including any activity that violates the intellectual property rights of others.

Data Privacy

In the course of developing new therapies and providing health benefits to our employees, we may acquire or maintain personal data. We understand that sharing personal data, whether you are an employee, job applicant, research study subject, research investigator, healthcare professional, patient, vendor or supplier, is an act of trust. We will honor that trust and respect the privacy rights of any person who provides their personal data to us, and are committed to complying with all global privacy laws. All Ultragenyx employees share in that accountability to protect personal data and to process such data responsibly in accordance with any applicable laws and Company policies. **Our privacy program demonstrates our commitment to the highest ethical standards.**

What is "Personal Data"?

"Personal Data" is any information that can identify, or can be used to identify, a person. In some cases, the person can be identified directly (e.g., name or person's photograph) or the person can be identified indirectly (e.g., a medical insurance number, title/ position in a company or by means of a study code assigned in a clinical trial).



Employees who collect, process, share, or use personal data abide by the following principles:

- Notify people about how their personal data will be used prior to collecting the information and obtain explicit consent when required by local laws;
- Limit the personal data collected to what is reasonably necessary for the intended legitimate business purpose;
- Use personal data only for the specific business purposes described in the notice, other compatible purposes, or obtain consent for secondary uses;
- De-identify personal data when possible;
- Keep personal data only as long as necessary;
- Safeguard personal data so that it is not shared with others who do not have a valid business reason to access the information;
- Follow local legal requirements when transferring personal data across country borders;
- Provide reasonable mechanisms consistent with local laws for people to review and correct their personal data to ensure accuracy at all times;
- Track all access, changes to, and locations of personal data; and
- Report any potential or actual data breaches to the Legal and Information Technology Departments.

Accurate Business Records

We are committed to maintaining accurate business records and accounts in order to ensure legal and ethical business practices and to prevent fraudulent activities.

Investors rely on us to provide accurate information on which they can make good decisions.

You are responsible for:

1. Reporting accurate, complete and understandable information about our business, earnings, and financial condition;
2. Maintaining records and communications in the normal course of business and pursuant to Company policy;
3. Cooperating fully with outside accountants in connection with any audit or review of our Company's financial statements;
4. Coming forward if you feel that you are being pressured to prepare, alter, conceal or destroy documents in violation of our Company policy or any statutory document retention requirement; and
5. Reporting to the Company using the resources listed in **Raising Concerns** if you have any reason to believe that someone has made a misleading,

incomplete, or false statement to an accountant, auditor, attorney or government official in connection with any investigation, audit, examination or filing with any government agency or regulatory body. We do not tolerate retaliation against those who raise concerns in good faith or those who participate in an investigation relating to such a complaint.

Examples of unethical practices regarding business records include, without limitation:

- *Maintaining undisclosed or unrecorded funds or assets for any purpose;*
- *Improperly accelerating or deferring the recording of expenses or revenues to achieve financial results or goals;*
- *Giving false quality or safety results;*
- *Understating or overstating known liabilities and assets;*
- *Hiding the true nature of any transaction; and*
- *Providing inaccurate or misleading information to take advantage of company benefit programs.*



Conflicts of Interest

“Doing the right thing” includes avoiding activities that can create or give the appearance of a conflict of interest between personal interests and the Company’s interests.

A conflict of interest exists when a personal interest or activity could influence or interfere with your performance of duties, responsibilities, or commitments to the Company. A conflict of interest also exists when you receive an improper personal benefit as a result of your position at the Company. Although we cannot list every type of situation where a conflict of interest may arise, the following are some common examples:

- You or a close family member being employed by, acting as a consultant to, or having a significant financial interest in a competitor, supplier, or business partner of the Company;
- Hiring or supervising a family member;
- Serving as a board member of an outside commercial company or organization whose interests conflict with those of the Company;
- A business relationship between the Company and you or someone in your family (e.g., joint ventures, partnerships, personal loans); and

- Accepting or offering gifts, discounts, favors, or services from or to a customer, competitor, or supplier where someone else could perceive those business courtesies as impairing your judgment or loyalty to the Company.

Address conflicts of interests before they arise by communicating situations that can create an actual or potential conflict of interest, or the appearance of one, to your supervisor, the Legal Department, or Human Resources. Members of our board of directors and executive officers are required to consult with the General Counsel about such situations.

GIFTS

You may only offer or accept a gift if it is consistent with industry practice, meets a valid business purpose, is infrequent, reasonable in cost (e.g., combined value of all gifts from a given source does not exceed US\$100 or the local equivalent in a given year), does not violate any law, regulation, or the standards of conduct of the recipient’s organization, is reported to applicable government authorities as necessary (e.g., U.S. Physician Payments Sunshine Act), and is properly reflected on the Company’s books. A “gift” means anything of value, a favor, or a benefit provided free of charge or at a charge less than fair market value. Gifts of cash or cash equivalents (e.g., gift cards, checks,



Q: *Carl is in the middle of a vendor selection process, and the representative of a potential vendor offered him courtside seats to a Golden State Warriors basketball game. He said he got them for free because his uncle works for the Warriors organization. Carl is a huge fan and cannot afford courtside tickets on his own. Can he accept these tickets?*

A: *No. Accepting this gift could influence or be perceived to influence the selection of a vendor. Also, regardless of how the vendor representative obtained these tickets, the value of these tickets can range from US\$1,000 to US\$3,000 per ticket. This excessive value would likely create a sense of obligation or the appearance of impropriety. Therefore, Carl cannot accept these tickets.*



stocks) are never acceptable. Also, as a rule, you may never use personal funds or resources to do something that cannot be done with the Company's resources. Further, employees are prohibited from accepting any gifts, meals, entertainment, or any other business courtesies from individuals or entities currently participating in a bidding process to obtain work from our Company.



Q: *A physician has an idea for an investigational clinical study that might help patients with an unmet medical need and has come to you, as an Ultragenyx employee for financial support. Can Ultragenyx provide support and if so, would this be considered a gift?*

A: *Maybe. You should thank the physician for presenting the idea and direct the individual to the Ultragenyx grants portal so that they may submit a project application that may be reviewed by the grants review committee. An Ultragenyx employee should never agree to or make promises for such a request. If the grants review committee decides to approve such a study, then this would not be considered a gift.*



CULTURAL NORMS

We recognize that some employees, officers, and directors work in countries that may have different gift-giving norms. In some countries gift giving is an important cultural tradition aimed at building professional relationships. In these instances, you should exercise good judgment to determine whether to accept the gift or business courtesy, and should consider the following factors before making a decision:

- The monetary value of the business courtesy (i.e., nominal or lavish)

- The motivation for giving the business courtesy
- The motivation for wanting to accept the business courtesy
- Whether it would embarrass the Company if this exchange was disclosed to the public

Local laws may also specify additional restrictions on gift giving or outright prohibit gifts or certain types of transfers of value. Contact your supervisor or the Legal Department if you are unsure if it would be appropriate to give or receive a business courtesy.



Treating Others with Respect

Ultragenyx is dedicated to maintaining a healthy and inclusive company where employees feel respected and valued.



Respect is a fundamental necessity and tremendous value that we require and expect from every employee at Ultragenyx. This is core to our corporate culture and in alignment with our company goals to foster a thriving culture based on inclusion and diversity. We are committed to creating an environment where every employee feels a sense of belonging as they are welcomed and included into our diverse workforce and company.

Equal Employment Opportunity

We are firmly committed to a policy of equal employment opportunity for all qualified persons without regard to actual

or perceived race, color, alienage or national origin, ancestry, citizenship status, religious belief or dress, age, sex, sexual orientation, gender identity or expression, genetic information, uniform service member status, marital status, pregnancy, medical condition or information, physical or mental disability or handicap, or arrest record, as well as any other category protected by federal, state and/or local laws. This includes, but is not limited to, recruiting, hiring, promotion, transfer, leaves of absences, compensation, training, benefits, and termination.

Our global workforce is a melting pot of cultures, contexts, skills, and expertise. We work hard to cultivate a business environment that values inclusion.

Anti-Discrimination and Anti-Harassment

All employees have the right to work in a workplace where they are treated with respect.

We strive to provide a productive, diverse, and harmonious working environment that is free from discrimination. Employment decisions are made on the basis of merit, qualifications, and competence. Employment practices and actions are made according to employee skills, knowledge, responsibilities, performance, results, and contributions to the success of our business. We also provide reasonable accommodations based on disabilities and religious beliefs consistent with applicable laws.

We do not allow corporate systems and assets to be used in any manner that would be discriminatory, harassing, obscene, threatening, intimidating, or for any other purpose that is illegal, disruptive, offensive to any employee or other person, harmful to morale, against Company policy, or not in the best interest of the Company.





We are committed to providing a work environment free of any harassment or abusive conduct, including sexual harassment.

Harassment includes verbal or physical conduct that threatens, offends, or belittles any individual because of race, religious creed, color, national origin, ancestry, physical or mental disability, medical condition or information, marital status, age, sexual orientation, gender identity or expression, pregnancy, childbirth or related medical condition, or any other basis protected by applicable federal, state or local laws and regulations.

Examples of harassment include:

- Derogatory jokes, comments, or name-calling;
- Unwelcome sexual advances, pushing, or touching; and
- Offensive images or rude gestures.

If you see, suspect, or experience any form of discrimination or harassment, speak up right away by using the resources listed in [Raising Concerns](#). We do not tolerate retaliation against those who raise concerns in good faith or those who participate in an investigation relating to such a complaint.



Q: *Jane’s boss, Harry, is well-liked and well-respected by his colleagues. He is very friendly and often calls Jane “Sugar” or “Doll.” He also puts his hand on Jane’s shoulder whenever he comes to her desk to talk to her. These actions make Jane feel uncomfortable, but she is afraid to confront Harry or report him to Human Resources. What should Jane do?*

A: *Jane may choose to talk to Harry and let him know that his actions make her uncomfortable. Hopefully, he will apologize for making her feel that way and adjust his behavior. If Jane does not want to speak to him or is not comfortable with the outcome of her conversation with Harry, Jane should report the instance(s) to Human Resources, so that appropriate action can be taken. Jane is afraid that if anyone finds out that she reported Harry, they will treat her differently. However, Jane should rest assured that the Company will not tolerate retaliation against her by any employee because she has a good faith concern about her well-being.*



Health and Safety

We are committed to providing a healthy and safe work environment for employees, customers, and visitors worldwide.

Health and safety is everyone’s responsibility. We expect all employees to conduct work in a safe manner in compliance with all Company policies, and to report all health and safety concerns to their supervisor, Human Resources, or the Corporate Operations Manager even if the issue appears to have been resolved.

PREVENTION OF WORKPLACE VIOLENCE

It is of utmost importance to the Company that we work together to prevent workplace violence or threats of physical or emotional harm to our employees. We will not tolerate conduct that threatens, intimidates, or coerces another employee, a customer, or a member of the public at any time, whether it occurs at or away from work and whether or not it is work-related. The company prohibits possession of weapons in the workplace. If you or someone is subjected to this behavior you must, without delay, report it to your supervisor, Human Resources or the Legal Department.

Threats of violence from any source that are not addressed, including those from outside the workplace, could result in

harm to other employees in the workplace, and should be reported as soon as possible so that extra precautions can be taken. It is the Company’s intent to act upon, assess, and resolve all threats of violence that could affect the workplace, and to assist any employee who may be concerned about his or her safety.

DRUG FREE WORKPLACE

We strongly advocate and are focused on maintaining a work environment where employees and their co-workers are free from the effects of illegal drugs, alcohol, or other controlled or job-impairing substances. The use of job-impairing substances or being under the influence

of drugs or alcohol while on the job affects your judgment and skills and poses a danger to the welfare and safety of other employees. It also exposes the Company to risks of property loss or damage or injury to other persons. We do not tolerate anyone working under the influence of these substances. If you are using medicine prescribed to you by a doctor that may impair your ability to do your job, discuss it with your supervisor.

Alcohol may be permitted during approved Company-sponsored events. However, individuals who consume alcohol must take care, accept personal responsibility for their actions and are expected to act professionally at all times.





Ensuring Patient Safety

We are committed to being a hero for our patients and delivering safe and effective therapies.



Good Operating Practices

Our Company's reputation is dependent on the trust that patients, healthcare professionals, and the general public place in us.

We do not take this lightly and are committed to the highest levels of quality, safety, and efficacy on which this trust is based. These principles are reflected in the research, development, and manufacturing of our products.

We comply with all applicable laws, regulations, and international standards dealing with Good Laboratory Practices, Good Manufacturing Practices, Good Clinical Practices, and Good Pharmacovigilance Practices (collectively "GxP"). In addition to maintaining our own internal rigorous quality standards, we require our suppliers and business partners to adhere to similar high standards when performing work for or on behalf of the Company. All employees involved in the research, development, or manufacturing of our products are expected to know his/her relevant GxP responsibilities and corresponding Company policies and procedures.

We expect and maintain the highest levels of integrity and security with respect to our supply chain and relevant partners, ensuring compliance with the Drug Supply Chain Security Act ("DSCSA").



Drug Safety & Pharmacovigilance

We are committed to proactively monitoring and ensuring the safety of our products with the ultimate goal to safeguard our patients and business.

In addition to this ethical and scientific responsibility, we have a legal obligation to report relevant safety information and adverse events (AEs) to worldwide regulatory authorities. We all play an important role for ensuring the safety of our products and compliance with safety reporting requirements.

Any individual acting on behalf of the Company, including employees, temporary employees, consultants, business partners, and vendors are required to complete Adverse Event (AE) Reporting for Ultragenyx Products training. Any individual acting on behalf of the Company has a responsibility to report all AEs for Ultragenyx products (whether approved or investigational) via email ultragenyx@primevigilance.com or fax at +1 (415) 930-4033 to Drug Safety & Pharmacovigilance (DSPV) within one (1) business day of receiving such information, even if the information was unsolicited.



An adverse event or adverse experience (AE) is any untoward medical occurrence in a patient or clinical investigation subject administered a pharmaceutical product and which does not necessarily have a causal relationship with this treatment.

An AE can therefore be any unfavorable and unintended sign (including an abnormal laboratory finding), symptom, or disease temporally associated with the use of a medicinal (or investigational) product,



Q: During a routine call with the patient's mother, she reported her son who is taking an Ultragenyx product has been complaining of mild diarrhea. She mentioned she read in the product label that diarrhea is an expected side effect for the product and she will let the doctor know next month at the appointment. What should you do?

A: Email or fax the AE report to DSPV within 1 business day since all AEs even if described in the Product Information must be reported and even if it is known that it was reported by the physician.

whether or not related to the Ultragenyx Product (medicinal or investigational product). This also includes the following situations, which may or may not be associated with an AE:

- abuse, lack of effect/efficacy, medication error, misuse, off-label use, occupational exposure, overdose (intentional and unintentional), pregnancy exposure (including paternal exposure at time of conception), use during lactation, suspected transmission of infectious agent, and drug-drug or drug-food interactions.
- AEs already described in the Product information (e.g. labeling) regardless of severity, seriousness, or relationship to the Product.

Upon becoming aware of an AE, you should attempt to collect the following four key elements including:

- **Reporter:** name or initials, contact information (e.g., phone number, email, address), qualification (e.g., physician, pharmacist, nurse);
- **Event:** a description (using reporter's wording) of the AE or PC;
- **Patient:** name or initials; date of birth or age or age group (e.g. pediatric, adolescent, adult), and gender; and



Q: Jack, a Medical Science Liaison, is having lunch in the hospital cafeteria after meeting with one of his physician clients. He unintentionally overhears a woman talking at the table next to his about how her daughter has been experiencing diarrhea and severe itchy skin since she began using an Ultragenyx product. Does Jack need to report this?

A: Yes. Regardless of how Jack learns of the event or whether he thinks it was a side effect of the Ultragenyx product, it is his responsibility to report it within one (1) business day from when he overheard the conversation. Jack should try to obtain key information to include in his report, but he must report it regardless of whether the information is incomplete.

- **Product:** Ultragenyx product or counterfeit: product name, indication (reason for taking product), lot #, strength, dosing, formulation; and
- If applicable, the clinical trial, IST or EAP in which the subject was enrolled.



Operating an Honest Business

We are committed to doing things right.



Anti-Bribery and Anti-Corruption

We take a zero-tolerance approach to corruption and bribery, and are committed to the prevention, deterrence and detection of bribery, fraud and all other corrupt business practices.

Employees, officers, directors, affiliates and subsidiaries, and any business partner or other third party acting on behalf of the Company are strictly prohibited from offering, promising, paying, authorizing the payment of, receiving, or agreeing to receive anything of value (including non-tangible items such as information)

in order to improperly influence a government official or private person, or in exchange for a business favor or advantage. We are subject to a number of federal, state, local, and foreign laws in countries where we operate that prohibit bribery and other forms of corruption (e.g., U.S. Foreign Corrupt Practices Act (“FCPA”) and U.K. Bribery Act (“UKBA”). The consequences can be severe for both individual violators and the Company.

Under no circumstances may political or charitable contributions be used to conceal corrupt payments. This prohibition applies regardless of whether the contribution is made to a government

official or to a charity designated by a government official or agency.

We must be extra cautious when we select third parties to do work on our behalf because we may be held liable for any acts of bribery or corruption that they commit. Therefore, it is essential that employees perform due diligence on a potential business partner during the selection process to ensure that there are no actual or perceived conflicts of interest and that their business practices are in line with the Code and our Company policies. Third parties must also agree to abide by applicable laws, including the FCPA and UKBA.

Red Flags

The following is a non-exhaustive list of “red flags” that might suggest an increased likelihood that a business transaction involves bribery or corruption.

-  *Requests for cash or cash equivalent payments;*
-  *Requests for excessive fees, commissions, or volume discounts compared to the market rate;*
-  *Contracts that contain vague descriptions of services;*
-  *Refusal to agree to anti-bribery language in contracts or any written agreements;*
-  *Location in a region or country known for widespread corruption;*
-  *Has been subject to criminal enforcement or civil actions for acts suggesting illegal, improper, or unethical conduct;*
-  *Requests for payments to offshore accounts or accounts in a location different from where the business partner is located;*
-  *Representatives are closely related to or recommended by government officials;*
-  *Lacks the experience or resources to perform the required services;*
-  *Refusal to answer due diligence questions or allow audit clauses in contracts; and*
-  *Lack of a compliance program or code of conduct and refusal to adopt one.*



Antitrust and Competition Laws

We comply with all antitrust and competition laws in the United States and other countries in which we do business.

These laws prohibit any agreements or practices that improperly restrict business competition in order to maintain a balanced playing field for businesses to compete on the basis of quality, price, and service.

Antitrust and competition laws are very complex and vary from state to state and country to country. Failure to adhere to these laws could result in significant penalties imposed on both the Company and the employees who violated the law. Anyone acting on behalf of the Company must not discuss, make an agreement with, or otherwise disclose to our competitors, including, but not limited to, the following:

- Actual or potential customers;
- Pricing or pricing strategy;
- Business terms of customer relationships;
- Sales policies;
- Marketing plans; and
- Contract terms and contracting strategies.

Anti-Slavery Policy

We are fully committed to respecting human rights and combating modern slavery. In line with that commitment, we strictly prohibit the use of forced, enslaved, indentured, or involuntary labor in our business and prohibit contracting with any third party that relies on forced, enslaved, indentured, or involuntary labor, including, but not limited to, our direct supply chains.

Accordingly, if any employee believes the Anti-Slavery Policy is being violated in any capacity, please report this to Ultragenyx. An employee may anonymously report their concerns through Ultragenyx’s Compliance Hotline at <http://www.openboard.info/RARE/> or by telephone at +1 (866) 862-3064.

Third-Party Relationships

We are fortunate to have talented and motivated employees working together to transform lives around the world, but developing strategic long-lasting and mutually beneficial relationships with third parties (e.g., vendors, suppliers, and business partners) is critical to our Company’s success.

We believe in fair and open competition, and employees should gather and evaluate information about several third parties before selecting who to work with.

In addition, certain scopes of work require submitting to the Company’s RFP process.

We require written contracts with third parties that provide us with goods, services, licenses, and subscriptions, and also when the transactions involve the exchange of money or confidential information, the exercise of intellectual property rights, or a request for indemnification or limited liability Interactions with Healthcare Professionals.

We interact with Healthcare Professionals in an ethical and professional manner, and





consistent with applicable domestic and international laws, regulations, and industry codes that govern these relationships. Out of respect for the independence of Healthcare Professionals, we prohibit inducements or rewards in any form to avoid the perception of interfering with a healthcare professional's judgment or medical decision-making. These interactions are intended to benefit patients and enhance the practice of medicine by focusing on the following four areas:

1. Informing Healthcare Professionals about the appropriate use, benefits, and risks of our products, as approved by applicable government authorities;
2. Providing truthful, balanced, and non-misleading scientific, clinical, and educational information;
3. Supporting medical research and education in an ethical, compliant and transparent manner; and
4. Obtaining feedback and advice about our scientific and medical activities or our products based on legitimate or bona fide business needs.

All payments and other compensation offered to Healthcare Professionals for their services must be consistent with fair market value based on the country where they practice medicine or conduct business.



Who is a Healthcare Professional?

“Healthcare professionals” is a broad category of people that includes anyone who is:

1. *involved in prescribing, dispensing, administering, or purchasing our products; or*
2. *in a position to influence the use of, recommend, or facilitate access to our products.*

Money Laundering

Anti-money laundering laws of the United States and other countries and international organizations require transparency of payments and the identity of all parties to transactions.

It is against the law and Company policy to knowingly engage in transactions that facilitate money laundering or result in unlawful diversion of assets. We are committed to full compliance with anti-money laundering laws throughout the world and conduct business only with reputable customers involved in legitimate business activities and transactions.

You are required to protect our Company's integrity and reputation by helping to detect possible money laundering activities. Things to watch out for when conducting third party due diligence include, but are not limited to:

- Requests for cash or cash equivalent payments (e.g., traveler's checks from an unknown third party);
- Reluctance to provide complete information and/or provide insufficient, false, or suspicious information;
- Unusual transfers to or from countries not related to the transaction;
- Eagerness to avoid record-keeping requirements;



- Larger volume purchases that appear to be inconsistent with normal ordering patterns, without any legitimate business reason;
- Complex deal structures or payment patterns that reflect no real business purpose; and
- Payments made in one form and requests that a refund payment be made in another form (e.g., paying with a credit card and requesting a refund be made via wire transfer).

What is Money Laundering?

“Money laundering” is the process of taking funds obtained through illegal activities and making them appear legal. It usually consists of 3 steps:

1. **Placement** – Funds are deposited into financial institutions or converted to negotiable instruments (e.g., money orders or traveler’s checks);
2. **Layering** – Funds are moved into other accounts in an effort to hide their origin; and
3. **Integration** – Funds are reintroduced into the economy and often used to purchase legitimate assets, fund legitimate businesses, or conduct other criminal activity.

Trade Restrictions

We are subject to economic sanctions laws and regulations in the countries where we conduct business that prohibit or restrict us from engaging in or supporting certain activities, projects, transactions, or other dealings.

Anyone working on behalf of the Company, including employees, temporary workers, business partners, and vendors, must conduct reasonable due diligence prior to engaging in such activities to ensure compliance with the trade laws that apply to our business.

In addition, a number of countries have enacted regulatory measures or “blocking statutes” designed to discourage and, in some cases, penalize compliance with the economic sanctions of other countries. Navigating the often competing demands of applicable sanctions, laws

and regulations and blocking statutes can be complex and require analysis by an attorney. In particular, before proceeding with any activity, transaction, or other business dealing with individuals or entities that are based in Cuba, Iran, North Korea, Syria, Sudan, or the Crimea region of Ukraine/Russia, please contact a member of the Legal Department.

Prior to conducting business, all potential business partners are screened according to the Company’s Vendor Diligence Process to ensure, among other things, that transacting business with the potential business partner is not prohibited or restricted. It is important to be sure this process is complete before entering into a business relationship. In addition, all potential business partners in the U.S. must be screened against applicable exclusion, debarment and suspension databases.





Transparency

We are committed to complying with all applicable federal, state, and local, as well as global, transparency laws and regulations to ensure lawful, appropriate, and transparent activities with Healthcare Professionals, healthcare organizations, and patient organizations.

Being transparent means that we:

- Track, aggregate, and disclose payments or other transfers of value made to applicable individuals or entities (as required by applicable laws) in an accurate and timely manner;
- Document and report (as required) the results of clinical trials according to regulations;
- Provide truthful, balanced, and non-misleading information about our products; and
- Maintain the highest level of ethical relationships with Healthcare Professionals.



Publications

We are committed to the responsible and ethical publication of meaningful results from clinical trials of our investigational and approved products.

Such publications are an important part of the scientific process, and we support medical progress through the dissemination of new research findings. Scientific publication development and distribution is not done for the purposes of commercially promoting off label or unapproved use of our products. We do not interfere with the scientific process or seek to influence the ultimate conclusions of authors, who remain solely responsible for the content of any publications.

Our publications of Company-sponsored studies report results in an objective, accurate and balanced manner, including discussions of study strengths and limitations. We also disclose all financial support received for the research, as well as any financial relationship with any investigators, authors, or contributors.



Patient and Caregiver Interactions

We respect the doctor-patient relationship and the privacy rights of patients, and are committed to making sure that all of our interactions with patients and caregivers are appropriate and in compliance with applicable laws and regulations.

Employees who participate in patient or caregiver events presented by our Company, hospitals, other independent healthcare institutions, and patient advocacy organizations must first receive Health Insurance Portability and Accountability Act (HIPAA) /privacy training. Such interactions can begin only after patient and/or caregiver consent has been obtained, and discussions must be limited to information contained in approved materials.



Patient Organization Interactions

We firmly believe that our interactions with patient organizations should reflect common values of integrity, independence of all parties, respect, equity, transparency and mutual benefit.

We interact with patient organizations because we have a shared interest in helping patients and caregivers understand and manage their disease/condition, including having timely and equitable access to the treatment they need. Patient organizations are critical in helping us gain a greater understanding of what it is like to live with a disease, the challenges facing patients and their families, and the role that drug therapies play in the management of the disease. They also provide us with valuable insight on how to support Healthcare Professionals who, in turn, support patients.

The following principles guide our relationships with patient organizations to ensure appropriateness and transparency:

- The scope and objectives of any collaboration must be open, transparent, and ethical;
- Despite being a global company, we must always comply with local rules involving interactions with patient organizations;
- The interests of patient organizations must never be subordinate to our own;
- The focus must never be on the promotion of our products or services, and where such promotion is not allowed, care should be taken that the interaction is not intended nor can be perceived as promoting our products and services; and
- Respect the privacy of all personal information and data we may receive.
- All interactions with Patient Organizations should go through Patient Advocacy (in the United States contact patientadvocacy@ultragenyx.com)



Engaging with the Public

We are committed to the highest standards in our communications and interactions with the public.



Marketing Communications

We are committed to providing accurate, appropriate, and reliable information to the media, patients, patient organizations, our shareholders and the healthcare community.

To this end, all of our marketing programs and associated materials are reviewed and approved by our Materials Review Committee (“MRC”) to ensure compliance with laws and regulations on promotion and advertising. The MRC is comprised of members from our Regulatory, Medical Affairs, and Legal departments.

Anyone working on behalf of our Company is prohibited from creating their own marketing and promotion materials or altering in any way materials that have been approved by the MRC.

Corporate Communications

We are committed to providing consistent and accurate information when disclosing information to the public.

To maintain consistency and accuracy, and to ensure the protection of confidential information, we designate official company spokespersons who are authorized to respond to questions from the public and speak on the Company’s behalf.

While we respect the legal rights of our employees to use social media, we expect you to use it responsibly and exercise good judgment when posting content. You should refrain from commenting about our business, pipeline, or products and should not appear to speak for or on behalf of the Company on any subject unless officially authorized to do so. In addition, always disclose and be truthful about your identity, role and affiliation with the Company relating to any officially authorized activity.

When using social media, you should:

- Make clear that your views are your own;
- Not represent or imply that you are speaking for the Company; and
- Not post Company’s confidential or proprietary information.

Official Spokespersons

If you are approached for interviews, comments by the news media, the financial community, the medical community, or other non-governmental external sources or audiences, refer them to the following designated official company spokespersons:

For Financial Reports and Investor Relations:

Ted Huizenga

SVP, Chief Accounting Officer
ir@ultragenyx.com

For Media Inquiries:

Carolyn Wang

SVP, Global Corporate Communications
cawang@ultragenyx.com

For Government Agency Information Requests:

Betsy Ricketts

Vice President, Government Affairs, Legal
bricketts@ultragenyx.com



Public Company Disclosure Obligations

The Company's business affairs are also subject to certain internal and external disclosure obligations and recordkeeping procedures. As a public company, we are committed to abiding by our disclosure obligations in a full, fair, accurate, timely, and understandable manner.

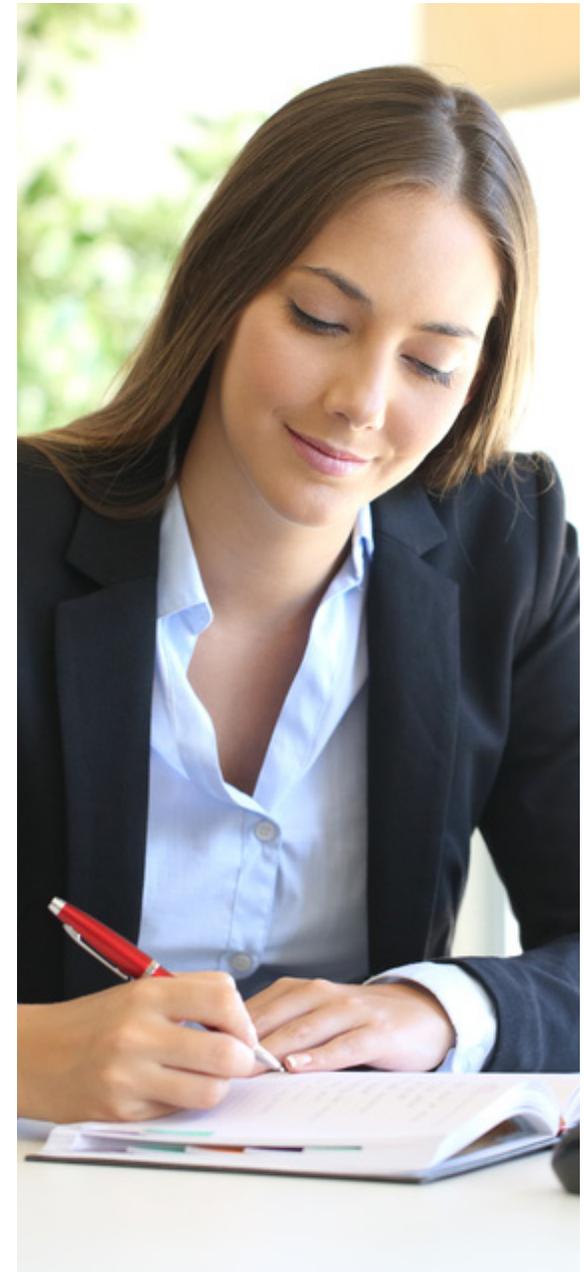
Only with reliable records and clear disclosure procedures can we make informed and responsible business decisions. When disclosing information to the public, it is our policy to provide consistent and accurate information. To maintain consistency and accuracy, specific company spokespersons are designated to respond to questions from the public. Only these individuals are authorized to release information to the public at appropriate times. The CFO, the CEO, or the General Counsel must approve all press releases, speeches, publications, or other official Company disclosures in advance.

Our internal control procedures are further regulated by the Sarbanes-Oxley Act of 2002 (the "Sarbanes-Oxley Act"). The Sarbanes-Oxley Act was a U.S. legislative response to events at public companies involving pervasive breakdowns in corporate ethics and internal controls

over financial reporting. It was designed to rebuild confidence in the capital markets by ensuring that public companies are operated in a transparent and honest manner. Ensuring proper and effective internal controls is among Ultragenyx's highest priorities.

We take seriously the reliance our investors place on us to provide accurate and timely information about our business. In support of our disclosure obligations, it is our policy to always:

- Comply with generally accepted accounting principles;
- Maintain a system of internal accounting and disclosure controls and procedures that provides management with reasonable assurances that transactions are properly recorded and that material information is made known to management;
- Maintain books and records that accurately and fairly reflect transactions; and
- Prohibit establishment of material undisclosed or unrecorded funds or assets.





Insider Trading

During the course of your work for or with the Company, you may come into possession of material, non-public information about our Company, customers, suppliers, or any company that we currently or potentially will do business with. ***It is against both the law and Company policy to either buy or sell securities (e.g., stocks, bonds, or options) while aware of material non-public information, or pass such information along to others who use it to buy or sell securities (known as “tipping”).*** This includes the trading of both Company stock and the securities of any other company. We have also adopted certain procedures that apply to members of our board of directors, executive officers, and certain designated employees and consultants of the Company and its subsidiaries who regularly have access to material non-public information about the Company. We make it a priority to help prevent inadvertent violations of the federal securities laws and to avoid even the appearance of trading on the basis of material, non-public information.



Common examples of material information include the following, without limitation:

- Earnings or losses, including projections or other earnings guidance;
- A pending or proposed merger, acquisition, or sale of all or part of the Company's business;
- Changes in management, members of our board of directors or auditors;
- Clinical trial results;
- Significant new products or discoveries;
- Negotiations regarding an important license, distribution agreement, or joint venture;
- Pending FDA or other regulatory action;
- Actual or threatened major litigation, or the resolution of such litigation; and
- New major contracts, orders, suppliers, customers or finance sources, or the loss thereof;

What is Material Information?

Information is “material” if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy, hold, or sell a security. Any information that could reasonably be expected to affect the price of the security is material.

“Non-public information” is information that is not generally known or available to the public. Information is considered to be available to the public only when it has been released broadly to the marketplace (such as by a press release or an SEC filing) and the investing public has had time to absorb the information fully. As a general rule, Company information is not considered public until a full trading day has passed after the information is made available to the public.



Political Activity and Lobbying

We encourage personal participation in the political process in a manner consistent with all relevant laws and Company guidelines.

You may support the political process through personal contributions or by volunteering your personal time to the candidates or organizations of your choice. These activities must not be conducted on Company time or involve the use of any Company resources such as telephones, computers, or supplies.

You are prohibited from making or committing to political contributions on behalf of the Company. If you express a personal view in a public forum (e.g., posting on social media or writing a letter to the newspaper), do not use Company letterhead, your Company e-mail address, or reference your business address or

title. Furthermore, you must refrain from doing or saying anything that could lead someone to believe that you are speaking on behalf of the Company.

Rules for Political Activity and Lobbying

The following rules apply when you want to engage in personal political activity and lobbying:

- 1. The Company will not reimburse you for personal political activity.*
- 2. Your job will not be affected by your personal political views or your choice in political contributions.*
- 3. Do not use the Company's reputation or assets, including your time at work, to further your own political activities or interests.*
- 4. Anything of value is considered a gift and is subject to all applicable local, state and federal jurisdictional rules if received by a government employee i.e. public university professor, city public health official.*
- 5. If you plan to seek or accept a public office, you must obtain prior approval from the General Counsel (i.e. appointment to local government commission).*



Environmental Stewardship

We are committed to conducting business in an environmentally responsible manner and strive to improve our performance to benefit our employees, customers, communities, shareholders, and the environment.

We use energy wisely and efficiently and employ technology to minimize any risk of environmental impact. Employees whose work affects environmental compliance must be completely familiar with the permits, laws, and regulations that apply to their work. All employees are responsible for making sure that Company business is conducted in compliance with all applicable laws and in a way that is protective of the environment.

Resources for Getting Answers

Taking Action: You can ask a question or raise a concern by contacting any of the following:

Legal Department

Karah Parschauer, EVP, General Counsel
Email: kparschauer@ultragenyx.com

Compliance

Email: compliance@ultragenyx.com

Human Resources

Ernie Meyer, EVP, Chief Human Resources Officer
Email: emeyer@ultragenyx.com

Compliance Hotline

Website: <http://www.openboard.info/RARE/>
Email: RARE@openboard.info
Phone: +1 (866) 862-3064

Drug Safety and Pharmacovigilance

Email: drugsafety@ultragenyx.com
Fax: +1 (415) 930-4033

Medical Information

Email: medinfo@ultragenyx.com

Investor Relations and Financial Matters

Ted Huizenga, SVP, Chief Accounting Officer
Email: ir@ultragenyx.com

Media Inquiries

Carolyn Wang, SVP, Global Corporate Communications
Email: cawang@ultragenyx.com

Government Affairs

Betsy Ricketts, Vice President, Government Affairs, Legal
Email: bricketts@ultragenyx.com



Ultragenyx Pharmaceutical Inc.

60 Leveroni Court
Novato, CA 94949