



Ionis Pharmaceuticals
U.S. Corporate Political Engagement Policy
Updated July 2024

1. Ionis Engagement with Government Officials and Stakeholders

Public policy plays an important role in the biopharmaceutical industry. Ionis engages with government officials and other stakeholders in a constructive, responsible, and transparent manner. Our active participation in this process allows us to inform and contribute to the development of sound public policy that impacts our business, our ability to continue delivering innovative therapies to patients, and the communities we serve.

All political activities are made in support of company objectives and the communities we serve and are not based on the personal preferences of individual employees, executives, or board members.

2. Corporate Contributions

Ionis does not use corporate resources, either directly or indirectly, to contribute or support election-related activity, including contributions to candidates, political parties or committees, in support of or in opposition to ballot initiatives/measures, and other political entities organized and operated under Section 527 of the U.S. Internal Revenue Code. In certain, limited cases, contributions to 501(c)(4) social welfare organizations may be authorized in writing by the CEO in accordance with applicable laws and regulations.

Ionis does not currently maintain a voluntary, employee-funded political action committee (PAC) and does not make any corporate contributions on independent expenditures or independent expenditure PACs (Super PACs).

Ionis is a member of industry trade associations. Our participation in trade associations does not mean that Ionis agrees with every position that a trade association takes on an issue and our corporate positions may differ from those of the trade association of which we are members.

3. Transparency and Reporting of Corporate Political Activity

3.1 *Lobbying Transparency*

Lobbying is a highly regulated corporate activity conducted by the Government Affairs & Policy department. Ionis complies with all federal and state laws and regulations that govern lobbying activities, interactions with government officials, and reporting requirements.



Ionis registers in-house lobbyists and reports federal lobbying activities to the Clerk of the House of Representatives and the Secretary of the Senate in accordance with applicable laws and regulations.

These quarterly reports are public and can be found at the websites of the Clerk of the House and the Secretary of the Senate. Additionally, Ionis will make any public disclosure of lobbying activity available on the Ionis website.

3.2 Disclosure of Corporate Contributions to Trade Associations and 501(c)(4) Organizations

In addition to lobbying, trade associations of which Ionis is a member and 501(c)(4) organizations may use a portion of our membership dues for political activities. Ionis will disclose contributions made to trade associations and 501(c)(4) organizations on a semi-annual basis and make these disclosures available on the Ionis website.

4. Employee Engagement in Political Activities

Ionis employees have the right to voluntarily participate in the political process by making personal contributions and volunteering as a private citizen. Employees who wish to engage in these activities must not use any Company resources in these activities and must make it clear that they are acting as a private citizen and not on behalf of the company.

Employees who wish to engage in lobbying activities for valid business reasons and on behalf of Ionis may only do so in coordination with the Government Affairs & Policy department.

5. Governance, Compliance, and Oversight

The Executive Compliance Committee reviews Ionis's internal policies and compliance with disclosure requirements. Ionis's public policy priorities are reviewed and approved on an annual basis by executive leadership. Ionis's Government Affairs & Policy department, which reports to our SVP, Corporate Affairs, oversees our direct and indirect advocacy efforts and is responsible for the activities, positions, and daily decision making, consistent with oversight from Ionis leadership and the Board of Directors.

Ionis has developed compliance policies and procedures to ensure adherence to the Corporate Political Engagement policy.