

**Healthcare Professional (“HCP”)  
Consultant Travel and Expense (“T&E”)  
Reimbursement Policy (“Policy”)**

**1. PURPOSE**

The purpose of this Policy is to provide HCP consultants (the “*Consultant*”) contracted with Ionis Pharmaceuticals, Inc. (“*Ionis*”) with:

- The guidelines related to necessary business travel and reasonable expenses, and in some cases travel compensation, in connection with the work being performed by the Consultant on behalf of Ionis;
- The procedures for reimbursement of T&E expense;
- The types of business travel and related expenditures that are and are not reimbursable by Ionis; and
- Information regarding the consultant’s responsibilities to control and report business travel and related expenses.

Ionis has formulated this Policy to ensure that travel-related arrangements are consistent with applicable Ionis policies, federal, state, and local laws, industry code(s), and applicable guidelines (e.g., the PhRMA Code).

**2. SCOPE**

This Policy applies to all Consultants authorized by Ionis to engage in consulting, development, education, and/or clinical services on behalf of Ionis. It does not apply to consultants or vendors engaged by Ionis who are not HCPs.

**3. DEFINITIONS**

**Healthcare Professional (“HCP”)**: HCP means U.S. individuals:

- Involved in the provision of health care to patients (such as a physician, a nurse, or others who provide health care directly to patients); or
- Who purchase, recommend, use, arrange for the purchase of, or prescribe Ionis products (such as a hospital, clinic, or academic medical center); or
- Who do not provide health care directly to patients but are involved in the decision to purchase or recommend a medicine (such as purchasing agents, physician’s practice managers, or managers within group purchasing organizations, third-party payors, and health insurers).

**4. POLICY STATEMENTS**

**I. General**

**A.** Consultants may be reimbursed for ordinary and reasonable expenses in connection with the work being performed for Ionis, including necessary travel, lodging, and meals. All travel must meet Ionis’ needs and comply with applicable Ionis policies, laws, and regulations. Consultants are responsible for adhering to their employer’s internal policies, which may govern the reimbursement of expenses.

**B.** In some jurisdictions, transparency laws and standards may require that Ionis publicly disclose certain payments and other “transfers of value” provided to consultants.

**C.** Ionis may not distribute funds to a consultant for reimbursement of expenses without first approving the corresponding reimbursement requests submitted by that Consultant. The Consultant must submit requests for reimbursement using the HCP Consultant Invoice/Expense Reimbursement Form found in **Annex A** no more than thirty (30) days after the expense was incurred.

**D.** Ionis-engaged Consultants are responsible for booking all travel arrangements required as part of the consulting services Consultant provides to Ionis (e.g., airfare, accommodations, car rentals) either independently or through a third-party vendor as directed by Ionis. Ionis can manage travel, transportation, or meals directly, but the Consultant must accept and use the pre-arranged services and meals.

**E.** Travel is only permitted roundtrip between Consultant’s home/current location and the location where Consultant is required to provide consulting services. Travel change requests that would result in additional costs above the original approved roundtrip fare cost require pre-approval by Ionis. Ionis must approve any other change requests that this Policy does not permit.

- Change is NOT permitted if due to engagement by another company.
- Change fees will only be reimbursed if the change is due to an Ionis request.

**F.** Consultants are required to submit appropriate documentation for expenses in accordance with the following guidelines:

- Ionis has established the standard meal limits outlined in **Annex B**.
- Unless Ionis approves, Ionis will purchase or reimburse the Consultant for travel only if arrival and departure dates are within one day of the Ionis event, meeting, or scientific congress. Ionis does not schedule or pay for travel to accommodate personal travel plans and activities.
- All expenses require an itemized receipt for reimbursement. Originals or scanned copies are permitted. Credit card slips do not provide details about the items purchased and do not replace the requirement for itemized receipts.
- Hotel folios are required for reimbursement of hotel stays.

**G.** Ionis reserves the right to, from time to time, in Ionis' sole discretion, update this Policy. It is the Consultant's responsibility to review and understand the Policy before incurring any expenses for which Consultant will require reimbursement.

## **II. Ground Transportation**

**A.** For ground travel, the preferred options are a personal vehicle, taxi or rideshare (e.g., Uber/Lyft economy or comfort class), or public transportation. Tolls and parking will be reimbursed, and mileage will be reimbursed at the current rate published by the Internal Revenue Service (IRS). Gas is included in the mileage allowance and should not be expensed separately. Submission of mileage is required on HCP Consultant Invoice/Expense Reimbursement Form. Otherwise, the Consultant should use the shortest distance shown on an online mapping service (e.g., Google Maps).

**B.** Rental cars are permitted with written pre-approval from Ionis only when other means of transportation are unavailable, more costly, or impractical. Ionis permits reimbursement for a mid-size vehicle or other car of comparable cost unless there is a compelling rationale for a larger vehicle. Ionis does not reimburse for refueling penalties or additional insurance for rental cars.

- Collision damage waiver ("**CDW**") insurance should not be purchased for rental cars driven in the United States for business. If the rental car is driven outside of the United States, including Canada and Mexico, additional insurance should be purchased through the rental car company. Ionis does not reimburse rental car and related charges when used for personal travel.
- If an accident occurs in a rental car while on Ionis business, the accident should be reported to the rental car company and local authorities, as required, as soon as practical.

**C.** If the above options are not feasible, car service (i.e., black sedan) is permitted to and from an airport or train station to the location of the Consultant meeting or for trips where the cost of car service is equal to or less than the cost of air or train travel plus ground transportation to the meeting location. Longer distance car service may be used when convenience and business rationale justify the additional cost upon prior written approval from Ionis'.

## **III. Airline/Rail Travel**

**A. For air or rail travel under 6 hours (one leg):** Seating should be booked in economy or coach class. A Consultant may use personal frequent flyer miles/certificates (where applicable) to upgrade a coach-class ticket or personally pay for the difference between coach and any higher-class fare. Managing a consultant's air miles account is the responsibility of the Consultant, including personally facilitating any frequent flyer upgrades and reconciling any fare difference with a personal credit card directly with the airline. All additional costs associated with any such upgrade are non-reimbursable by Ionis. Seat upgrades to a higher seat class due to a health reason may be permissible subject to Ionis' approval.

**B. For air or rail travel over 6 hours (one leg):** Business class travel is permitted if any one leg is 6 hours or longer.

**C.** When possible, flights should be scheduled at least two weeks before the meeting date.

**D.** Up to two checked baggage fees, internet fees, and Ionis required cancellation or change fees will be reimbursed or paid.

#### **IV. Lodging Expenses**

**A.** Consultants are limited to staying in modest and business-appropriate hotels rated 3 or 4 stars, chain hotels like Marriott, Hilton, or Hyatt. Top-tier chain hotels and resorts, such as the Ritz Carlton, are not allowed unless the Consultant attends a congress or convention at such a venue on behalf of Ionis or if no other lodging types are available and Ionis' has provided approval.

**B.** Hotel gratuities (reasonable tips for hotel services) are reimbursable. Requests for reimbursement of cash tips do not require an itemized receipt, but they can be entered into the invoice.

**C.** Hotel internet and parking fees are reimbursable.

#### **V. Modest Meals**

Ionis' policy allows for reasonable and modest meals, with maximum amounts specified in **Annex B**.

#### **VI. Travel Time Renumeration**

Consultants may be reasonably compensated for travel time incurred when it is necessary to provide services on behalf of Ionis under the Consultant's written agreement with Ionis. As total compensation for time spent traveling to conduct the Services, Ionis or its designee will pay the Consultant based on the Travel Classification outlined in the table below. Consultant's Travel Classification is based on round trip travel distance (in miles) from Consultant's origin to destination. No travel time compensation will be provided when the Consultant travels to the destination for any purpose other than to conduct the services described in the Consultant's written agreement with Ionis (e.g., to attend a congress or conference at the same time and location).

<b>Travel Classification</b>	<b>Approximate Distance (One Way)</b>	<b>Approximate Distance (Round Trip)</b>	<b>Total Hours (Round Trip)</b>	<b>Total Payment Hours<sup>1, 2</sup></b>
<b>No Travel</b>	No Travel	No Travel	0	0
<b>Travel A</b>	1 - 200 mi 1 - 300 km	1 - 400 mi 1 - 600 km	4	2
<b>Travel B</b>	201 - 1,000 mi 301 - 1,600 km	401 - 2,000 mi 601 - 3,200 km	8	4
<b>Travel C</b>	1,001 - 3,000 mi 1,601 - 4,800 km	2,001 - 6,000 mi 3,201 - 9,600 km	12	6
<b>Travel D</b>	3,001 - 7,000 mi 4,801 - 11,200 km	6,001 - 14,000 mi 9,601 - 22,400 km	18	9
<b>Travel E</b>	> 7,000 mi > 11,200 km	> 14,000 mi > 22,400 km	24	12

1 "Total Payment Hours" are the hours an HCP Consultant is compensated for travel based on a 50% utilization level of round trip travel time.

2 Travel length assumes optimal travel (e.g., plane, car, train) which is why "Total Payment Hours" and "Approximate Distant" are not linear or proportional. To calculate the hours traveled for multi-destination trips, please reference the following example: An HCP Consultant travels from Las Vegas to Nashville (1,000 miles) and completes the first program. The next day the HCP travels from Nashville to New Orleans (500 miles) and completed a second program. Upon completing the program, the HCP Consultant travels from New Orleans back home to Las Vegas (800 miles). To calculate the "Total Payment Hours", sum the total travel miles 1,000 miles + 500 miles + 800 miles = 2,300 miles. Next, reference the "Approximate Distance (Round Trip)" column to determine the range of total miles falls within, which based on this example is classified as Travel C. Based on the round trip mileage, 2,300 miles, and the Travel C "Travel Classification" the "Total Payment Hours" for this multi-destination trip example is 6 hours.

#### **VII. Non-Reimbursable Expenses**

**A.** Ionis will not reimburse certain expenses, including, but not limited to:

- Any expenses pertaining to spouses or guests of the Consultant
- Any expenses for anyone other than the Consultant
- Incidental hotel charges incurred during the stay (e.g., in-room movies, dry cleaning, hotel laundry, mini bar, health club)
- Any other transportation when transportation has already been provided and paid for by Ionis or a third-party vendor as directed by Ionis

- Individual meals when a group meal has already been provided
- Fees or expenses for private or chartered aircraft or watercraft
- Airline or rail travel seat class upgrade fees
- Any fees associated with cancellations or changes that are not at Ionis' request
- Uber Black, Lyft Black, or limousine car service, except as expressly stated in this Policy
- Personal items or articles of clothing/accessories
- Lost and/or stolen property
- Personal medical expenses
- Personal entertainment during travel
- Babysitting fees
- Pet-sitting fees
- Gifts
- Donations

### **VIII. Submission of Expenses for Reimbursement**

**A.** If the Consultant is providing commercial speaker program services, invoices must be submitted to the program vendor (e.g., Veeva Events), within 10 days of the date the expenses are incurred, using the program vendor invoice form. The program vendor will email the Consultant the invoice form along with submission instructions.

**B.** All other Consultant reimbursement of expenses must submit a detailed invoice (see **Annex A**) for each engagement and scanned copies of original itemized receipts for all expenses to the AP invoice mailbox: [invoices@ionisph.com](mailto:invoices@ionisph.com). Each invoice must list lodging, meals, and transportation expenses separately.

**Annex A**

**HCP Consultant Invoice/Expense Reimbursement Form**

**Payable to:**

Company Name: \_\_\_\_\_  
(if applicable)

Invoice Date: \_\_\_\_\_

Name: \_\_\_\_\_

Invoice # (required): \_\_\_\_\_

Address: \_\_\_\_\_

PO # (required): \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Invoice Amount: \_\_\_\_\_

Email: \_\_\_\_\_

NPI, State License or Tax ID#: \_\_\_\_\_

**Payment Terms:** Net 30 days

**Bill to:** Ionis Pharmaceuticals, Inc., 2855 Gazelle Court, Carlsbad, CA 92010

**Instructions:** Please email this completed form to [invoices@ionisph.com](mailto:invoices@ionisph.com) within 30 days of the services performed and itemized receipts for all applicable expenses listed below. List expenses related to consulting hours, travel time, and mileage reimbursement incurred on different dates as separate line items. Include To/From addresses for mileage reimbursement and locations for travel time.

**Consulting Services & Travel Time Compensation**

Description of Services	Date	Total Hours*	Contracted Hourly Rate**	Amount

\* Total Hours for Consulting Fees or Travel Time.

\*\* Hourly rates for Consulting Fees and Travel time differ. Please refer to your contract with Ionis for details. Personal mileage reimbursement is based on the current IRS standard mileage rate: <https://www.irs.gov/tax-professionals/standard-mileage-rates>

**Reimbursable Transportation (itemize each travel expense)**

Description (e.g., Flight/Mileage/Rental Car/Parking)	Date	Mileage	Travel City, State	Travel Country	Amount

**Reimbursable Lodging (Include Room & Tax, Excludes Meals)**

Hotel	Date(s)	Hotel City, State	Hotel Country	Amount

**Reimbursable Meals (Itemize each meal expense)**

Restaurant/Vendor Name	Meal Type (i.e., Breakfast, Lunch, Dinner)	Date	Travel City, State	Travel Country	Amount

<b>Total Consulting Services:</b>	
<b>Total Reimbursements:</b>	
<b>INVOICE TOTAL:</b>	

*By submitting this HCP Consultant Invoice/Expense Reimbursement form to Ionis, you confirm that the information and amounts listed in this invoice are true, complete, and accurate. You acknowledge and agree that Ionis may disclose, as appropriate and necessary under all applicable laws and regulations including, but not limited to, the Federal Physicians Payment Sunshine Act: 1) the existence and nature of your relationship with Ionis; 2) any remuneration provided to you by Ionis; and 3) any other payments or transfers of value to you from Ionis, as required by law and as determined by Ionis.*

## Annex B

### **Ionis HCP Consultant Meal Limits**

Ionis has established the following standard meal limits for each individual. However, concerning HCPs, these meal limits are subject to the requirements and limitations of state and local laws, which may be stricter.

Specific expense limits for meals are as follows:

- **Breakfast**: must not exceed \$50 (including beverages, taxes, and gratuity)
- **Lunch**: must not exceed \$50 (including beverages, taxes, and gratuity)
- **Dinner**: must not exceed \$100 (including beverages, taxes, and gratuity)