Code of Conduct

Jazz Pharmaceuticals

From the **President & CEO**



"At Jazz, our purpose — to innovate to transform the lives of patients and their families — is more than words; it's the promise that unites and inspires us every day. Our Code of Conduct brings that promise to life, guiding how we show up for one another and for the patients who are counting on us — including those facing rare diseases with few or no options. It challenges us to lead with integrity, to put people and patients at the center of our decision making and to pursue excellence with purpose. When we live our values, we don't just achieve strong performance — we create meaningful impact, build lasting trust and move closer to a future where every patient has more options and ideally, better outcomes."



— Renee Gala, President and CEO, Jazz Pharmaceuticals

Our **Values**



Our **Mission**

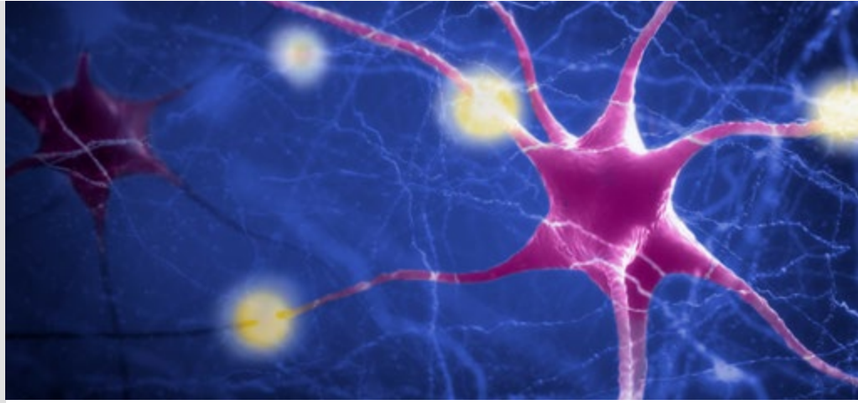
We are dedicated to developing life changing medicines for people with rare diseases — often with limited or no therapeutic options.

Our Mission, Purpose and Values **Drive Our Code**

Everything we do at Jazz is driven by a focus on people, patients and strong performance — we deliver meaningful impact by staying true to these priorities and our purpose and values that guide us.

At Jazz Pharmaceuticals, our Purpose is the "why" behind everything we do. Our Code is the "how." It is the roadmap that guides us in pursuing excellence while remaining steadfast in our ethical decision making.





Introduction to Our Code of Conduct

The Jazz Code of Conduct ("the Code") describes the principles for how we work, collaborate and make decisions. It reflects our values, obligations and commitment to patients, people and performance.

Our Code applies to all employees, officers and directors. Together, we uphold these principles and practices in everything we do on behalf of Jazz.



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Our **Expectations**

We act responsibly everywhere we work.

This Code is our shared foundation, guiding our actions alongside company policies and applicable laws. Each of us is accountable for understanding and applying this Code in our daily work — across every role, every decision, every day.

We make decisions guided by integrity, judgment and patient impact.

We pause and consider how our actions may affect patients, colleagues, partners, the public and Jazz's reputation.

We choose actions that reflect our values — even when no one is watching. When in doubt, we seek guidance from company resources.

This Code sets out our expectations for how we conduct business with integrity. It does not address every possible situation, so we rely on our judgment, values and a commitment to speak up when something does not seem right.

The Jazz Ethics & Compliance Speak Up Helpline is operated by an independent third party and is available 24/7. You may choose to report concerns anonymously, where permitted by local law.

We raise concerns early and without fear.

We speak up if something does not seem right, even if we are not sure, by contacting:

- **Managers**
- **Ethics & Compliance**
- **Human Resources**
- **Legal**
- **The Jazz Speak Up Helpline Information Page or directly online, Jazz Speak Up Helpline**
- **Phone: All in country, local numbers can be found on the above webpages**
- **Email: compliance@jazzpharma.com**

Asking questions is a sign of strength and integrity. Jazz prohibits retaliation for making a report in good faith or participating in an investigation.

Leaders and people managers are expected to model ethical behavior, create an environment where individuals feel safe to speak up, respond to concerns promptly and appropriately and consistently uphold our standards. All employees are expected to speak up or seek guidance when they observe misconduct, inappropriate behavior, safety concerns or retaliation. Maintaining a culture of integrity also requires employees to cooperate fully and truthfully in investigations and other fact finding activities conducted on behalf of Jazz.

Commitment to **Product Quality, Patient Safety & Clinical Independence**

Our commitment to patients guides the decisions we make. We hold ourselves to the high, shared standards of safety and quality across the entire lifecycle of our medicines — from discovery through development, manufacturing, distribution and beyond. Scientific integrity and clinical independence are not just internal disciplines; they are the foundation of the trust patients, caregivers and healthcare professionals place in us.

Adherence to Quality Regulations

We apply rigorous quality standards at every stage of the product lifecycle and comply fully with current regulatory requirements, including Good Manufacturing Practices (GMP), Good Laboratory Practices (GLP) and Good Clinical Practices (GCP). Our Quality Management System exists so every medicine we release consistently meets regulatory expectations and patient needs. When deviations, product concerns or data integrity issues arise, we address them with transparency and urgency — every time, without exception.

Compliance with Healthcare Laws

We comply with all healthcare laws and regulations governing our work, including those related to research, safety reporting, product promotion, antibribery and anticorruption, interactions with healthcare professionals (HCPs) and patient privacy. Operating across a complex global regulatory landscape means standards sometimes differ by country or region — when they do, we follow the highest applicable standard, and we seek guidance from Ethics & Compliance or Legal whenever we need clarity.

Responsible Interactions with Healthcare Professionals & Advocacy Groups

Our relationships with HCPs, patient and advocacy groups and scientific partners are grounded in respect, transparency and a shared commitment to improving patient outcomes. We engage HCPs for legitimate scientific, educational or clinical purposes — never to improperly influence prescribing or purchasing decisions. We value our partnerships with patient and advocacy organizations and honor the independence that makes their voices meaningful. All support, collaboration and funding is documented, aligned with applicable laws and Jazz policies and free from promotional influence.

Ethical Innovation, Scientific Integrity & Clinical Independence

Our commitment to patients guides how we innovate, develop and deliver our medicines. We pursue scientific advancement responsibly, grounded in ethical rigor, clinical independence and a clear focus on patient safety and medical need.

We generate, document and evaluate scientific and clinical data with integrity, accuracy and transparency. We do not suppress unfavorable results, distort findings or mislead stakeholders. We maintain the accuracy of data across the product lifecycle and safeguard personal and health information in line with applicable privacy and data protection laws.

We conduct research and product development ethically and with respect for human rights, including informed consent, appropriate oversight and inclusive practices. By incorporating patient perspectives and considering the broader impact of our work, we strive to advance health, build trust and support a more equitable and sustainable healthcare system.

Separation of Promotional Activities & Scientific Exchange

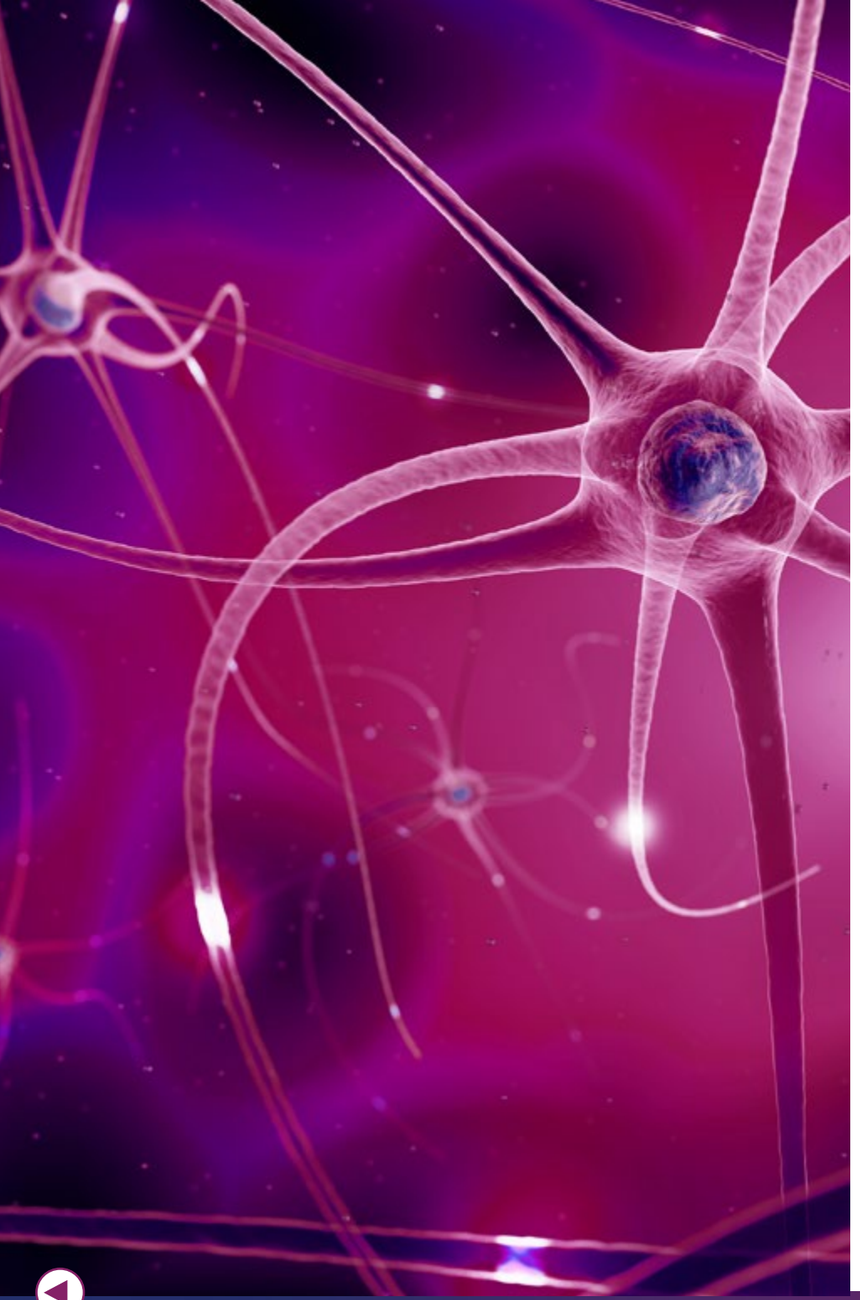
We maintain a strict and intentional separation between promotional activity and scientific exchange. All promotional communications align with approved product labeling and regulatory requirements. Scientific exchange — including medical information responses, clinical data discussions, investigator meetings, advisory boards and research collaborations — are conducted with objectivity and independence from promotional influence with the intent of providing HCPs with the information they need to make informed decisions with and for their patients.

Patient safety starts with all of us.

Promptly report (within 1 calendar day) any adverse event, product complaint or safety concern involving a Jazz product so it can be appropriately evaluated and addressed.

AEReporting@jazzpharma.com

Drug Safety/Jazz Pharmaceuticals



Respect for **People & the Planet**

At Jazz, we are guided by principles of dignity, inclusion and responsibility in how we treat one another and how we operate in the world. Respect for people, engagement with our communities and stewardship of our planet are foundational to who we are and serve as critical guideposts to our business strategy and daily activities. These principles inform our decisions and expectations, even when the right path is not always the easiest.

A Safe and Respectful Workplace

A respectful and safe work related setting is fundamental to who we are. We hold ourselves to principles of fairness and accountability, fostering an environment free from harassment, discrimination, bullying and retaliation for everyone, everywhere. Safety and respect are not just policies we follow; they are foundational to our culture, and each of us shares responsibility for living these principles and speaking up when something isn't right. Employees should feel comfortable raising concerns, challenging decisions respectfully, reporting misconduct or asking questions without fear or retaliation.

A Welcoming Culture

We believe that differences in background, experience and perspective make us stronger, and that people do their best work when they genuinely feel valued and heard. Guided by principles of fairness and inclusion, we are committed to equitable hiring and access to opportunity, creating conditions where all individuals can contribute and grow. Everyone at Jazz is responsible for establishing a welcoming and inclusive culture and making this a practice we demonstrate every day through how we listen, engage and treat one another.

Equal Opportunity

We hire, compensate, promote and develop people based on merit, qualifications and performance. At Jazz, there is no place for discrimination or unfair treatment of any kind. We are committed to equal opportunity and uphold protections in accordance with applicable laws consistently across every country and location where we operate. Fairness guides how we treat one another and reflects the commitment we make to everyone who works here. We create environments where people can contribute, belong and be heard.

Sustainability and Social Impact

Our Corporate Sustainability and Social Impact (CSSI) program is fundamental to our corporate purpose, integrated into our business strategy, and delivers on our commitment to generate positive outcomes for patients, employees, shareholders and other stakeholders. We believe responsible and sustainable business practices are essential to advancing health, earning trust, supporting patient safety and delivering long term value. We are committed to environmental responsibility by reducing our footprint, using natural resources thoughtfully and operating with respect for environmental standards wherever we do business. We integrate sustainability into how we manage risk, strengthen resilience and support the long term availability of medicines for patients.

We also seek to create positive social impact by investing in the health and wellbeing of the communities we serve. Through ethical partnerships, charitable giving and initiatives that improve access and support long term health outcomes, we aim to contribute to stronger communities and a healthier future for patients and society.

Ethical **Business Conduct & Integrity**

Our commitment to ethical business conduct is grounded in integrity, transparency and accountability. We act honestly, comply with applicable laws and regulations and make decisions that earn trust with patients, partners, regulators and one another. These principles guide how we conduct business — even when the right choice is not the easiest one.

Conflicts of Interest

We make decisions based on what's right for the company and the people we serve and in compliance with Jazz's policies — not our own or another's personal gain. When a personal interest could influence, or even appear to influence, our judgment — whether that's outside work, a financial interest or relationships with vendors or healthcare professionals — we disclose it promptly. Transparency is essential to maintaining trust and protecting our credibility.

Responsible Giving & Support

We do not offer gifts, meals, hospitality, donations or anything of value that could — or could reasonably appear to — influence clinical or purchasing decisions. Educational grants, sponsorships and charitable contributions are provided only for legitimate purposes and are never linked to prescribing or sales.

Accountability in Our Business Partnerships

The partners and intermediaries we work with are an extension of who we are. We select them thoughtfully, supported by appropriate due diligence, and we look beyond capability to ensure alignment with our values around ethical conduct, respect for human rights, animal welfare and environmental responsibility. Our responsibility does not end at onboarding; we actively monitor our business relationships over time to ensure our standards are upheld.

Transparent Business Interactions

We approach every business interaction with honesty, openness and sound judgement. We do not offer, give, solicit or accept bribes, kickbacks or anything of value to improperly influence decisions or gain an unfair advantage. This commitment includes avoiding any form of improper influence on healthcare professionals, patients or others involved in healthcare decision making. We respect the independent clinical judgment of physicians and the right of patients to make informed decisions based solely on appropriate medical considerations. We align with applicable industry Codes and apply robust standards to meals, speaker programs, consulting arrangements and third party education. We are committed to transparency and accountability, including meeting our obligations for accurate and timely public reporting each year.

Our engagements with healthcare professionals, government officials and business partners must always be ethical, lawful and guided by our commitment to patient wellbeing, scientific integrity and public trust.

Fair Competition & Dealing

We compete and succeed on merit. We do not enter into formal or informal arrangements that improperly influence prices, wages, markets or hiring decisions. We are thoughtful about what competitive information we share and with whom, and we do not misuse or seek competitor information improperly.

We will not agree with competitors on pricing, bid rigging, market allocation or boycotts. When a situation is unclear or feels uncertain, we pause and consult Legal before we act.





Ethical **Business Conduct & Integrity**

Accurate Records & Financial Reporting

We are committed to scientific integrity, ensuring that our research data, records and results are accurate, transparent and trustworthy. Our financial records reflect our commitment to accuracy and accountability. Every transaction must be complete, accurate, properly supported and recorded truthfully and on time — without exception. We follow company policies around financial reporting controls and applicable accounting principles. Employees are expected to use company funds and resources appropriately, maintain accurate and complete records, follow established processes and obtain necessary approvals. When something doesn't look right, whether it's an honest mistake or a more serious concern, we take responsibility and address it promptly.

Political Activities & Contributions

We respect the right of employees to participate in the political process in their personal capacity, using their own time and resources, and without implying company endorsement or involvement. Any political activity or contribution made on behalf of the company, or using company funds or resources, requires prior approval by Legal or Ethics & Compliance and must comply with applicable laws. Interactions with government officials are conducted responsibly and in line with the ethical standards that guide our business.

Insider Trading

Information we learn through our work is often sensitive and valuable, and we are responsible for safeguarding it. We do not buy or sell securities while in possession of material, nonpublic information learned in the course of our relationship with Jazz. We do not use nonpublic information learned in the course of our relationship with Jazz in prediction or similar markets. We do not share such information with others either. Before trading in securities, we carefully review Jazz's Insider Trading Policy, as well as Jazz's policies on confidentiality.

Global Trade & Sanctions

Operating globally requires careful attention to export controls, antiboycott, import and customs laws and economic sanctions, and we approach this responsibility with integrity and precaution. We do not engage in business or conduct studies involving sanctioned countries, entities or individuals unless explicitly authorized.

Acting with Financial Integrity

We do not engage in, support or facilitate tax evasion in any form — whether domestic or international. We conduct our business with integrity, ensuring that all tax related activities are lawful, transparent and properly documented. We do not assist others, directly or indirectly, in evading taxes.

We act with honesty and integrity in all that we do. We do not engage in, support or facilitate fraud, money laundering or any activity intended to conceal the origin of funds. We ensure that our actions, decisions, transactions and records are accurate, transparent, complete and properly documented, and we do not misuse our position or company resources for personal or improper gain.

Protection of **Company Assets**

Jazz's physical, digital and intellectual assets enable our work and mission. Protecting them is a shared responsibility. We use company resources appropriately, safeguard what has been entrusted to us and act to prevent loss, misuse or unauthorized access — wherever we work.

Data, Information Security & Intellectual Property

We use company data, information and intellectual property only for legitimate business purposes and protect them from unauthorized use or disclosure. We take appropriate precautions to ensure that such information is not communicated within Jazz except to employees who have a need to know such information to perform their responsibilities for Jazz, and we comply with all confidentiality notifications, including insofar as they restrict even internal communications prior to obtaining approval from a manager. We maintain accurate records according to company requirements.

We respect the confidential and proprietary information of others and handle it with the same care as our own. We hold ourselves, the partners and intermediaries we work with to consistent standards for protecting information across all markets in which we operate.

We follow cybersecurity practices to protect systems and data, including securing devices, safeguarding credentials and remaining alert to threats. We do not bypass security controls, and we report suspicious activity immediately. We act as responsible stewards of our company's innovations, protecting and preserving intellectual property to support our mission and future success.

Responsible Use of Technology & Artificial Intelligence

We use technology — including AI — securely, ethically and in alignment with company policy and applicable law. We rely only on approved platforms for company data, apply appropriate human judgment and oversight and verify the accuracy and reliability of outputs before using them. We take care to prevent bias, misuse or unintended harm and follow all AI governance requirements, including risk assessment, documentation and necessary approvals. We do not use technology in ways that could compromise confidentiality, intellectual property, privacy or regulatory obligations.

Data Privacy

We treat personal information with care and respect. We collect only what is needed, with consent, and retain it only as long as necessary, and use or share it in accordance with applicable laws and company policy. We take steps to prevent unauthorized access and promptly report suspected breaches.

Physical Property

We take care of Jazz facilities, equipment, devices and materials — using them responsibly and protecting them from theft, damage or misuse. Whether we are working on site or remotely, our responsibility is to protect company property.



Closing **Statement**

Our Code of Conduct is more than a document; it reflects our commitment to the patients we serve, the people we work alongside and the performance we deliver. It guides how we earn trust, make decisions and hold ourselves accountable — every day.

Each of us is responsible for acting with integrity — making thoughtful, ethical decisions even when faced with complexity or pressure. Speaking up when something doesn't feel right is essential to protecting our culture and our commitment to each other and to the patients we serve. We are expected to raise concerns promptly and to cooperate fully in any review or investigation.

Accountability matters. Failure to follow this Code, our policies or the law undermines our purpose and may result in appropriate action, up to and including termination.

By living this Code, we bring our values to life — advancing patient care, supporting one another and performing with integrity. This is how we build trust, strengthen our impact and succeed together.

