



**morphosys**

## Code of Conduct

Our key principles and ethical standards for how we work together and how we protect the value and integrity of MorphoSys worldwide.



Integrity in All We Do

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## Integrity in All We Do

Every two seconds someone in the world is diagnosed with cancer. But this is more than just a statistic. It's the driving force behind the work we do every day.

At MorphoSys we are driven by our mission to give more life to people with cancer. This is a big responsibility, and as such, we must operate with the highest level of integrity, respect and quality standards.

The MorphoSys Code of Conduct defines the ethical principles in how we conduct business and ourselves. It is our compass that guides us and our partners in the decisions we make each day – helping us build trust with people living with cancer and their families, healthcare professionals, shareholders and the public.

We expect everyone to read and follow the MorphoSys Code of Conduct. How we conduct business and treat one another is just as important as our business results.

I thank you very much for your continued commitment.

Regards,

Jean-Paul Kress, CEO

## Introduction

This Code of Conduct (the “Code”) sets forth the key principles and ethical standards for how we work together to develop and deliver innovative therapies, how we protect the value and integrity of MorphoSys AG and its subsidiaries worldwide (further – “MorphoSys” or “Company”), and how we work with our customers, suppliers, public authorities, and other partners and stakeholders in conducting our business.

This Code of Conduct applies to all employees and Management Board members (including officers and directors) of MorphoSys. Certain business partners, such as agents, consultants and vendors serve as an extension of MorphoSys. They are expected to follow the spirit of this Code of Conduct, as well as any applicable regulations and contractual provisions, when working on behalf of MorphoSys.

### What We Expect

We expect all of us to act with honesty and integrity, to comply with applicable laws and industry practices, and to exercise reasonable judgment when conducting business on behalf of MorphoSys.



This Code of Conduct specifies the standards of conduct for all MorphoSys employees and Management Board members and is intended to serve as a resource to help our employees understand our standards and expectations and to make good decisions for the company and for our patients and customers.

We are all committed to be trusted business partners for all of our stakeholders, including our employees, patients, clients and customers and aspire to be responsible members of society that is operating with due social and environmental responsibility.

### How Our Code of Conduct Helps to Navigate

While it is not always obvious that certain activities or situations present legal or reputational risks to you or the company, MorphoSys expects all employees to put integrity first in their decision-making. This Code is intended to guide you through common situations that require us to adhere to certain standards and to help us navigate this highly regulated industry.

The herein stated principles and values are designed to foster and enhance our culture of compliance. It gives us confidence in our day-to-day business to make things happen the right way and to apply **Integrity in All We Do**.

The Code of Conduct refers to the respective MorphoSys’s policies, procedures, and other resources that are available as additional guidance.

### How Our Code of Conduct is Organized

Our Code of Conduct is organized into four sections:

**MorphoSys** provides key principles governing every employee.

**MorphoSys Products** describes imperatives governing research, development, and manufacturing of high-quality products.

**MorphoSys Customers** sets out key principles for sales, marketing and medical affairs’ activities.

**MorphoSys Interactions with the External World** guides our relationships with investors, authorities, and media representatives.

The Management Board of MorphoSys AG has approved this Code of Conduct. The most current version of this document can be found on the MorphoSys website as well as on MorphoSys’ Intranet. Those who fail to comply with this Code, applicable laws, rules, regulations, standards, policies, and procedures are subject to discipline measures up to and including dismissal.



**Our Company's philosophy is built around people.**

**Our strategy is long-term oriented and patient-focused.**

**All our employees support these principles.**



# MorphoSys

## Our Credo

Our goal is to apply our expertise and technologies to build one of the world's leading biopharmaceutical companies. All our activities are directed at delivering innovative therapies to improve patients' lives. The work of every single employee is important and contributes to increasing the Company's value. Together, we strive for economic success for our Company, our shareholders and our business partners. We use our resources in a purposeful manner to be competitive and profitable, as well as to maintain the best standards of quality and technology. Clear and simple processes enable us to work fast and efficiently and be flexible in any situation.

We interact with all our partners in a professional and respectful way. We strive to surpass expectations in our work. By recognizing the needs of all of our stakeholders, we build long-term trusting relationships, thereby also ensuring our own success.



## Our Corporate Values

Our corporate values – **Innovation, Collaboration, Urgency and Courage** – are the basis for everything we do. By encouraging an inclusive and open culture, we create a motivating and inspiring working environment. Within our teams as well as throughout the Company, we support and help each other in achieving our goals. Questions are addressed objectively and without bias.

We set high standards for ourselves and aim to excel on behalf of patients. We commit to both giving and accepting feedback and suggestions, as well as to expressing genuine praise. We deal with mistakes constructively, in order to learn from them and thus permanently improve the quality of our work. Information is exchanged completely and as directly as possible. Decisions are communicated openly, at an early stage and with appropriate explanation.

## Readiness to Learn

We support the Company's progress with commitment and a readiness to learn. We assume responsibility for our actions. Our constant development and training efforts are actively promoted and supported. The personal situation and social interests of each member of staff are taken into consideration. Our people managers provide support and backing, afford the greatest possible freedom for the execution of tasks, and act as role models.

We commit to acting responsibly and to adopting necessary measures to protect the safety of our employees and the environment. With an open communications policy, we create confidence and trust in our interaction with the public.

### Highest Scientific and Ethical Principles

We strive to achieve the highest scientific and ethical principles in everything we do: this includes the way we conduct preclinical and clinical studies as well as how we interact with healthcare professionals, patients and caregivers as we are working on delivering innovative therapies to patients in need around the globe.



**“This Credo defines the spirit of MorphoSys. It provides us with objectives and orientation, is a binding provision for all our actions, and can be called upon by every single member of MorphoSys at any time.”**

### Diversity, Non-Discrimination and Non-Harassment

MorphoSys commits to supporting diversity at all levels of the organization and strictly prohibits harassment and discrimination of all kinds. We aspire to offer a vibrant, inclusive workplace that engages our broad diversity of people. We embrace differences and promote equal opportunities in our employment practices. We do not discriminate based on race, color, religion, nationality, age, sex, physical or mental disability, medical condition, pregnancy, genetic information, gender identity or expression, sexual orientation or marital status.

### Honest and Ethical Conduct and Fair Dealing

All MorphoSys employees and Management Board members are expected to endeavor to deal honestly, ethically, and fairly with collaborators, customers, suppliers, manufacturers, government employees, competitors, and employees in all business dealings on MorphoSys' behalf. Nobody should take unfair advantage of another person in a business dealing on the Company's behalf, including through the abuse of privileged or confidential information or through improper manipulation, concealment, or misrepresentation of material facts. All MorphoSys employees and Management Board members are prohibited from making any oral or written misrepresentations, and statements regarding MorphoSys' products and services must not be untrue, misleading, deceptive or fraudulent. This applies to all areas of MorphoSys' business and all of the MorphoSys' relationships.

### Protection and Proper Use of MorphoSys Assets and Property

Loss, theft, and misuse of MorphoSys' assets has a direct impact on MorphoSys' business and profitability. MorphoSys' assets include, without limitation, its tangible property, such as equipment, products, and money, and intangible intellectual property and confidential information, as well as business opportunities of which we may become aware. All MorphoSys employees and Management Board members are responsible for protecting the MorphoSys' assets that are entrusted to them, as well as for helping to protect MorphoSys' assets in general. Facilities and equipment must be well maintained and secured appropriately against theft and misuse. All MorphoSys employees and Management Board members are also expected to take steps to ensure that MorphoSys' assets are used only for legitimate business purposes. MorphoSys reserves the right to monitor the use of MorphoSys property (including computers, email, and phones) in accordance with applicable law.

Internet, intranet, and email communication and computer systems are essential tools for MorphoSys' business. Nevertheless, their inappropriate use may have severe consequences for MorphoSys and each individual employee. Such use is therefore prohibited.

When using the Internet, in particular no content may be accessed which could violate criminal laws, basic ethical values, which has racist, sexist or pornographic contents, is offensive or can in any other way damage the reputation and the interests of MorphoSys. It is equally prohibited to access in particular any content, which could endanger the security of the MorphoSys IT system.

## + LEARN MORE

- GLOBAL POLICY REGARDING DIGITAL INFORMATION SECURITY
- GLOBAL POLICY FOR THE USE OF INFORMATION TECHNOLOGY AND COMMUNICATION MEDIA
- GLOBAL POLICY FOR THE USE OF INFORMATION TECHNOLOGY AND COMMUNICATION MEDIA OF MORPHOSYS AG BY EXTERNAL PERSONS

AND RESPECTIVE LOCAL POLICIES

## Protecting Intellectual Property

MorphoSys provides a substantial contribution to treat serious and life-threatening diseases. With our business model, we are dependent on intellectual property rights and their efficient protection.

Intellectual property rights – patents, trademarks, regulatory data, copyrights, trade secrets, domain names, and other related rights – protect valuable assets of MorphoSys.

MorphoSys respects the intellectual property rights of third parties and aims to generate an awareness for intellectual property matters among its employees.

## Maintaining Accurate Business Records

We ensure the integrity of our business operations by keeping documents and records organized and making sure entries are accurate, complete and retrievable. Original data must be recorded exactly as it was first observed and cannot be rounded, guessed at, or altered in any way. Special care should be taken with the following records, whether paper or electronic records: financial records, including financial statements, GxP records, accounting entries, and supporting detail information.

## Internal Controls

MorphoSys has implemented and maintains an internal control system, which aims to ensure reliability of financial reporting, safeguarding of assets, compliance with applicable laws and regulations as well as effective and efficient operations. Internal controls comprise all preventive, monitoring and detective measures intended to ensure adequate security and control in accounting and operating functions. It is the responsibility of

each business area to keep its internal controls appropriately designed, up-to-date and execute them on a regular basis as part of everyday business practice.

## Avoiding Conflicts of Interest

We are responsible for acting in the best interests of MorphoSys and the welfare of its patients and for performing our duties and responsibilities honestly, objectively, and effectively. A conflict of interest can occur whenever you have a competing personal interest that may interfere with your ability to make an objective and effective decision that is in the best interest of MorphoSys, its investors, or patients. A conflict of interest may also arise if an individual or family member receives some personal benefit (whether improper or not) as a result of his or her position as an employee, officer, or director of MorphoSys. Each of us is expected to be alert, use good judgment, and avoid situations that can lead to even the appearance of a conflict of interest, which can put our reputation for honesty and fairness at risk and undermine the trust others place in us.

Conflicts of interest may be actual, potential or even just a matter of perception and may arise in many situations. The following are some common examples of potential conflicts of interest; however, since these situations are not always clear-cut, you need to fully disclose any situation that could be perceived as a potential conflict to your manager, HR and Compliance departments so that we can properly evaluate, monitor, and manage them.

• **Outside Employment or Activities:** If you or a close relative perform services for, advise, sit on the board of, or even volunteer for any competitor, supplier, customer (such as a hospital), or business partner of MorphoSys. Any such outside employment or business activities must be disclosed to and discussed with your manager, HR

and Compliance departments, and you must not engage in such activities without your manager's and respective departments' prior written approval. If approved, you must ensure such activities do not interfere with your work at MorphoSys or create any real or perceived conflict of interest.

- **Personal Investments:** If you or your close relative have substantial investment in, or obligation to, a customer, supplier, or competitor of MorphoSys. If you have questions about what rises to the level of "substantial", it is your responsibility to ask Investor Relations.
- **Friends and Relatives:** If you are in a position, where you are supervising or have influence over the job evaluation or compensation of a member of your immediate family or find yourself working with a close relative or friend who works for a customer, supplier, or competitor of MorphoSys. Since it is impossible to anticipate all situations that may create a potential conflict, you should disclose your situation to your manager, HR and Compliance in order to determine if any precautions need to be taken.
- **Corporate Opportunities:** If you learn about a business opportunity as a result of your position or employment with MorphoSys or through your use of MorphoSys' property or information, you may not divert that opportunity to yourself or others or use MorphoSys' property or information for improper personal gain.

## Internal Audit

Internal Audit is independent from MorphoSys operations. Its main role is to provide an independent and objective evaluation of the effectiveness of governance, risk management, and internal controls to the organization's governing body and senior management. Internal Audit is designed to add value and improve the Company's operations:

detect, report and help remediate weaknesses to protect our assets and provide transparency to senior management in prioritizing risks as well as mitigating them. Internal Audit can also give assurance to sector regulators and external auditors that appropriate controls and processes are in place and are operating effectively.

## Data Protection

In our digitized world, data can be collected, shared, and evaluated or used quickly and easily. It is therefore especially important that we take care to handle personal data\* responsibly. This includes data from employees, applicants, customers, business contacts, healthcare professionals, patients, and study participants. We protect the data entrusted to us by handling it properly, using it only for the intended and authorized purposes, considering the full rights of the data subjects at all times, and in accordance with applicable laws. Wherever possible, we obtain personal data directly from the relevant individual and maintain transparency about its usage.

**\*Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.**

## Confidentiality

Confidential information generated and gathered plays a vital role in MorphoSys business, prospects and ability to compete. “Confidential information” includes all non-public information that might be of use to competitors or harmful to MorphoSys or its customers if disclosed. We shall use confidential information solely for legitimate purposes. MorphoSys employees and Management Board members may not disclose or distribute MorphoSys’ confidential information, except when disclosure is authorized by MorphoSys or required by applicable law, rule or regulation or pursuant to an applicable legal proceeding.

Confidential information must not be shared outside MorphoSys without a confidentiality agreement approved by the Legal department. Confidentiality obligations continue even after you leave MorphoSys.

## Insider Trading

MorphoSys periodically discloses to the public important information concerning its business operations. Until MorphoSys has made important information about the company public, employees must keep it confidential and may not use it for their own personal gain. Information that has not been made public, but if known, may persuade a reasonable investor to buy, sell or hold a Company’s securities is called “inside” or “nonpublic” information. “Nonpublic” information may include clinical trial data, corporate strategies, mergers and acquisitions, revenue projections, strategic contracts, court cases or changes in our top management. Never use this information – whether it is about MorphoSys or any other company – to conduct a trade. Never “tip” someone else on what you know so that they may trade. Insider trading and tipping are illegal.

# + LEARN MORE

- POLICY DATA PROTECTION AT MORPHOSYS AG
- GLOBAL POLICY REGARDING DIGITAL INFORMATION SECURITY
- INSIDER GUIDELINES OF THE MORPHOSYS GROUP





**Our products are designed and manufactured according to established processes and procedures, compliant with all regulatory requirements with the final aim of improving patients' lives.**



## MorphoSys Products

### Protecting Patients and Developing High-Quality Products

Developing and delivering new breakthrough therapies to patients is the main aim of our work. To safeguard our customers' trust and patient safety, every MorphoSys employee and Management Board member demonstrates uncompromising dedication to quality and are expected, among other, to:

- Work in compliance with regulatory authorities' expectations and escalate any activity that would violate those;
- Immediately raise quality issues to their manager and/or to the appropriate quality personnel, with utmost sense of urgency if the detected issue has the potential of harming patients safety;
- Report all product quality complaints within one (1) business day to the designated call center or to MorphoSys US QA;
- Report all adverse events from any source to Global Patient Safety within 24 hours
- Fully understand, be trained in, and follow MorphoSys policies and SOPs applicable to their area of responsibility.



### Principles of Ethical Clinical Research

Ethical principles as well as all applicable laws shall be observed in any research activities of MorphoSys taking place either internally or commissioned by/to third parties. This includes the following in particular:

- Observance of ethical principles that have their origin in the "Declaration of Helsinki" when conducting clinical studies with humans;
- Compliance with applicable regulatory requirements for conducting clinical studies;
- Observance of ethical principles and regulations for carrying out animal testing;
- Adherence to the scientific rules and industry standards for obtaining research results and data;
- Correct handling of the publication of scientific studies and of the protection of the data contained in it.

### Engaging with Suppliers

We carefully select our suppliers. For our business activities, we need to purchase goods and services from reliable suppliers and sources. We work in partnership with our suppliers. We use fair, transparent processes when selecting our suppliers and contractors. We do not tolerate any misconduct such as corruption, unfair competition, and violation of environmental regulations.

When engaging or dealing with a supplier, we are required to:

- Consider established and preferred suppliers first;
- Involve Central Purchasing & Logistics before contacting the supplier for the first time;
- Clearly define neutral requirements and engage in fair and open competition;
- Ensure suppliers are reputable and qualified;
- Ensure the engagement of a supplier does not create an actual or apparent conflict of interest;
- Evaluate, approve, and contract with suppliers before any goods or services are received.

**+**  
**LEARN  
MORE**

- GLOBAL PURCHASING POLICY
- LOCAL PURCHASING POLICY MORPHOSYS AG
- LOCAL PURCHASING POLICY MORPHOSYS US INC
- GLOBAL POLICY ON COVERED THIRD PARTY ANTI-BRIBERY DUE DILIGENCE

AND RESPECTIVE LOCAL POLICIES

**M**orphoSys interacts with healthcare professionals (HCPs) and organizations (HCOs) to ensure patients always receive the most appropriate treatments.



## MorphoSys Customers

### Interactions with Healthcare Professionals (HCPs) and Healthcare Organizations (HCOs)

MorphoSys interacts with healthcare professionals (HCPs) and organizations (HCOs) to ensure patients always receive the most appropriate treatments and to enable the research and development of new treatment options to address patients' unmet medical needs.

We interact with HCPs and HCOs with honesty, fairness and integrity to foster scientific information about diseases and the effective use of healthcare products, in line with the relevant regulatory standards. We work with HCPs and HCOs to obtain insights on our relevant markets and how to better structure and implement our business strategies. We do not inappropriately influence HCPs and/or HCOs, with false or misleading information or anything of value, to obtain favorable treatment for MorphoSys or its products. MorphoSys does not pay more than fair market value for services or more than necessary to support clinical or medical education and research.



### Interactions with Patients and Patient Organizations

We recognize the importance of fully understanding the needs of the patient communities we serve. In our interactions with patient advocacy groups and allied organizations, we strive to build relationships based on mutual respect and transparency. Ensuring independence of these groups' patient voice, being transparent in our interactions and working cooperatively for the benefit of patients are at the core of these standards.

## + LEARN MORE

- GLOBAL ANTI-BRIBERY POLICY
  - POLICY ON EXTERNAL COMMUNICATION
  - GLOBAL POLICY ON INTERACTIONS WITH HEALTHCARE PROFESSIONALS, HEALTHCARE ORGANIZATIONS, PATIENTS AND PATIENT ORGANIZATIONS
  - GLOBAL FAIR MARKET VALUE POLICY
  - HOW TO MEAL CAPS
- AND RESPECTIVE LOCAL POLICIES

**Make Sure:**

- That all our product communications made with patient organizations are educational, evidence-based, objective, accurate and consistent with applicable company policies and with legal and regulatory standards;
- We structure any interaction with patient organizations preserving their independence;
- The written documentation setting out the nature and purpose of any support is in place;
- That MorphoSys is not the sole funder of the patient organization or any of its programs.

**Interactions with Payers**

MorphoSys interacts regularly with payers responsible for pricing, reimbursement, and other important administrative decisions on healthcare products, to ensure access to treatment for patients. We respect the independent and autonomous decision-making of payers. We provide payers with relevant scientific and economic information that is truthful, accurate, substantiated, fair and balanced so that they can make objective decisions. We do not try to influence payers or policy makers inappropriately to obtain favorable treatment for MorphoSys or its products.

**Marketing Practices**

We only promote our pharmaceutical products for uses that have been approved or authorized by appropriate government or regulatory agencies. Our product claims are grounded in scientific evidence, accepted medical practice and government-approved labeling rules in all countries where we operate.

We promote our prescription-only medicines to HCPs. We also promote them to the general public, but only in countries where direct-to-consumer advertising is allowed, and in compliance with the applicable regulations.

We communicate product information that is fair, balanced, objective, complete, accurate, and substantiated.

**Prohibition of Bribery and Corruption**

We comply with anti-bribery and anti-corruption laws. We never make inappropriate offers to external business partners or other third parties to influence their decision in our favor. We understand that accepting, offering or giving anything of value to influence a business decision or gain an unfair business advantage is improper and illegal.

We care particularly when dealing with government officials. In many parts of the world, government officials include healthcare professionals and hospital administrators who work in the public sector.

MorphoSys employees and Management Board members are prohibited from directly or indirectly paying anything of value to a government official in order to:

- Win or retain business or to improperly influence the act or decision of any government official, political party, candidate for political office, or official of a public international organization;
- Gain an improper advantage; or
- Illegally influence the action of any individual, customer, company, or company representative.

We recognize that we may be responsible for the payments made by third parties conducting business on our behalf, so we have put a due diligence processes in place to ensure that we are working with the business partners that have a reputation for operating with integrity.

**Fair Competition and Antitrust**

We follow antitrust laws. The fair pricing of our products is essential to our commitment to improving the health of patients worldwide. Therefore, we never engage in activities that restrain free trade – such as price fixing, bid rigging or other arrangements that violate antitrust laws.

Competition and antitrust risks may arise from arrangements, oral or written, between MorphoSys and its competitors, or MorphoSys and its suppliers or customers. We never enter into arrangements or exchange information with competitors, suppliers or customers, as applicable, about:

- Pricing and costs
- Terms or condition of sales or purchases
- Discounts
- Marketing strategies
- Market share allocation
- Customer lists
- Any other commercially sensitive or confidential information.

We are especially cautious when attending industry association meetings or any other interactions with competitors. If any kind of anti-competitive discussion arises, we must refuse to take part in the discussion, leave the meeting immediately, ask for our refusal to participate in such discussion to be documented in the meeting minutes, and timely report the incident to your manager and Compliance. Violation of antitrust and competition laws could result in severe penalties for both MorphoSys and its employees.

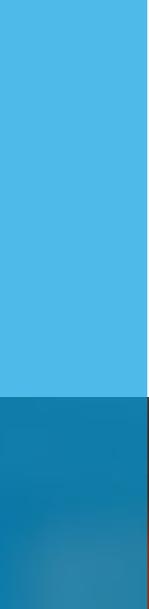
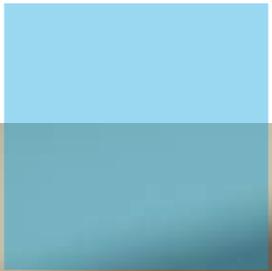
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- GLOBAL ANTI-BRIBERY POLICY
- GLOBAL POLICY ON COVERED THIRD PARTY ANTI-BRIBERY DUE DILIGENCE
- GLOBAL FAIR MARKET VALUE POLICY
- HOW TO MEAL CAPS

AND RESPECTIVE LOCAL POLICIES

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**e are mindful when we represent MorphoSys in public or when we talk about MorphoSys in our personal lives.**



## MorphoSys Interactions with the External World

### Communications with Media and Investors

Media relations are maintained by our designated spokespeople, who react timely to legitimate requests of the media and proactively disseminate information when this is judged to be in the best interests of the business. All requests from the media should therefore be recorded accurately and passed on immediately to Corporate Communications. This includes formal requests for interviews as well as enquiries from all media (TV/Radio, newspapers, magazines, local/national and trade media as well as internet sites).

Relations with the financial community (investors, analysts etc.) are maintained by our Investor Relations department. All requests from the financial community should therefore be recorded accurately and passed on immediately to this department.

MorphoSys provides equal access to information for all investors. The information must be full, fair, accurate, timely and understandable.

### External Speaking

External speaking engagements need to have a clear benefit to MorphoSys, and employees should obtain permission from Corporate Communications before accepting public external speaking engagements.

We are mindful when we represent MorphoSys in public or when we talk about MorphoSys in our personal lives. We are aware that we can be perceived as a representative of MorphoSys. We only make official statements about MorphoSys

when we are authorized to do so. If we use social media for a business purpose, we familiarize ourselves with the rules and strictly adhere to the Global Policy on Social Media.

### Cooperation with Authorities

Our cooperation with government agencies and officials is honest and forthright. We meet all requirements for accurate, timely reporting and documentation that may be required and cooperate with inspections and investigations. When asked for information or records or to verify data that we have submitted to them, we are truthful and transparent. If you receive a request, you should contact the responsible department.

### Corporate Social Responsibility

We want to be a good corporate citizen, contributing to society and supporting the communities where we operate. We are committed to provide resources, time and specific expertise of our colleagues and particularly support health and education projects. MorphoSys welcomes the efforts of employees who are involved in volunteer work.

We conduct our corporate social responsibility activities in form of grants, donations and sponsoring transparently. We provide grants and donations voluntarily, without expecting anything in return and abide by local laws and applicable regulations. Sponsoring activities differ from grants and donations – for sponsoring, we expect a tangible benefit, for example a prominent placement of the MorphoSys logo.

### Safety, Health and Protection of the Environment

We are conscious of the responsibility we share for present and future generations and see sustainable business operations as a prerequisite for long-term success. It is our responsibility to incorporate Environmental, Social and Governance criteria into our daily business and base our business model on sustainable growth that is aligned with the interests of all of our stakeholders. By doing this we are focused on creating long-term value and weight our actions in terms of their impact on the environment, society, patients and employees.

### Political Activities

We respect and support employees who participate in political activities in their communities should they wish to do so. However, participation in such political activities is allowed strictly as an individual in a private capacity and not on behalf of MorphoSys. It is important that activities that support political parties or candidates are not seen as those of the Company. It is important when engaging in personal political activities that it is separate from your work and thus you should not use Company property or equipment for this purpose. MorphoSys does not make any direct or indirect donations to political organizations, parties or individual politicians. Each exception from this rule must be approved by the Management Board first. Sponsoring and donations for the benefit of other, non-political recipients must not be used to circumvent the regulations of this Code.

### Speak Up

MorphoSys encourages open discussion of questions and concerns to ensure appropriate decision-making. As a first step, MorphoSys employees are expected to seek for answers and advice from their direct managers. In case there is a need to report any concerns or suspected cases of non-compliance, employees are encouraged to do so through the Integrity Line at <https://MorphoSys.integrityline.org/> or use telephone numbers provided on this platform and in the Global Policy Reporting Compliance Violations. The telephone

numbers are available 24 hours a day, 7 days a week. You can also choose to report an incident anonymously.

MorphoSys **prohibits retaliation** in any form against any employee or Management Board member who in good faith reports a suspected case of non-compliance. If you believe you are being retaliated against in any manner, please contact the Compliance Department immediately.



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- GLOBAL POLICY ON SOCIAL MEDIA
- GLOBAL POLICY REPORTING COMPLIANCE VIOLATIONS

AND RESPECTIVE LOCAL POLICIES



The most current version of this document can be found on MorphoSys intranet page as well as MorphoSys website.

[www.morphosys.com](http://www.morphosys.com)

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**Integrity in All We Do**