

# Act With Integrity – Make the Right Call



**Code of Business Conduct and Ethics**



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# A MESSAGE FROM OUR CEO



**“INTEGRITY  
IS THE  
FOUNDATION  
OF OUR  
CULTURE AT  
LEXICON ...”**

Mike Exton

Lexicon is proudly in the business of discovering, developing and commercializing medicines that our patients and healthcare stakeholders are relying upon. It is imperative therefore that we hold ourselves to the highest standard of transparency, business integrity and ethical behavior.

Accordingly, integrity is the foundation of our culture at Lexicon and is embedded within our Company values, in how we operate and how we treat others when conducting our daily activities and decision-making. Patients, the healthcare community and our stakeholders expect us to operate ethically. This is how we will earn the trust and respect of those with whom we interact.

The Code of Business Conduct and Ethics is our guide for how we operate. It is the expectation that every employee understands and complies with the legal and regulatory requirements and Company policies and will be honest and respectful of each other. This guide will not answer every question you may have about a policy, and you are encouraged to speak up and ask for advice when making business decisions and are unsure how to proceed.

Leaders at Lexicon are also expected to demonstrate a strong tone from the top and encourage a speaking-up culture. Seek advice when making decisions or when you need guidance. If you expect or see misconduct, report it to your manager or contact the Business Conduct Helpline. Lexicon has a non-retaliation policy and encourages all employees to speak up and raise concerns.

Success at Lexicon will be achieved through Transparency, Ownership, Respect, Integrity and Innovation. Thank you for your continued commitment to our mission to pioneer medicines that transform patients' lives.



Mike Exton  
**Chief Executive Officer**

## Our Mission

At Lexicon, we pioneer medicines that transform patients' lives.

## Our Vision

We will use precision science to pioneer medicines so patients can live better, more empowered lives.



## Our Values

Our values describe the core beliefs and behaviors that we commit to live by and demonstrate in all we do.

### Integrity:

We do the right thing, live up to our promises and follow the highest ethical standards in everything we do in the name of Lexicon.

### Innovation:

We are creative and scientifically rigorous in our focus on problems, developing solutions that truly impact patients' lives, while ensuring that our work is of the highest possible quality.

### Respect:

We value and encourage diversity and treat each other and those we work with professionally, always seeking first to listen and understand.

### Transparency:

We appropriately share all relevant information in a timely manner, and we always provide candid and objective feedback regarding our performance.

### Ownership:

We take full accountability for our actions and results, always seeking ways to be more effective and efficient, and we utilize limited resources as if they were our own.

## Purpose and Overview

Our business was built on a foundation of three strong pillars: Precision Science, Pioneering Medicine and a Patient-Driven Focus. And behind every breakthrough treatment, innovative therapy and improved patient outcome is a shared commitment to conducting business the right way.

Our Code of Business Conduct and Ethics (“Code”) affirms this commitment. It helps us comply with the laws, regulations and Company policies that govern our business and provides guidance and resources in situations where the right course of action may not be obvious. It’s a resource designed to help each of us:

- » Promote integrity and the highest standards of ethical conduct.
- » Address common ethical situations we could encounter in our work.
- » Avoid even the appearance of anything improper in connection with our Company’s business activities.



### *Who Must Follow Our Code*

All employees of Lexicon Pharmaceuticals (“Lexicon”), including officers and directors, as well as members of our Board of Directors, are required to read, understand and follow our Code.

Consultants, contractors, suppliers, vendors, temporary employees and other business partners who serve as an extension of Lexicon are also expected to follow the spirit of our Code, as well as any applicable contractual provisions.

Any waiver of this Code may be made only by the Board of Directors or a committee of the Board and will be promptly disclosed to stockholders as required by applicable laws, rules and regulations.

### *Complying With Laws and Regulations*

Lexicon is committed to compliance with all laws, rules and regulations that apply to our business, so it’s important to be aware of different laws and customs that apply in the countries where we operate. If any provision of our Code conflicts with a local law or requirement, seek guidance from the Legal and Compliance Department.

It is impossible to anticipate every question you may have, so in addition to the Code, Lexicon also has other resources that can be of help. These additional resources are listed throughout the Code.

## Our Responsibilities

Each of us must take responsibility for acting with integrity, even when this means making difficult choices. Meeting this obligation is what enables us to succeed and grow.

- » Act in a professional, honest and ethical manner when conducting business on behalf of our Company.
- » Know the information in our Code and Company policies, paying particular attention to the topics that apply to your specific job responsibilities.
- » Complete all required employee training in a timely manner and keep up to date on current standards and expectations.
- » Report concerns about possible violations of our Code, our policies or the law to your manager, an executive or any of the resources listed in this Code.
- » Cooperate and tell the truth when responding to an investigation or audit, and never alter or destroy records in response to an investigation or when an investigation is anticipated.

Lexicon leaders are expected to meet the following additional responsibilities:

- » Lead by example. As a manager, you are expected to model high standards of ethical business conduct.
- » Help create a work environment that values mutual respect and open communication.
- » Be a resource for others. Be available to communicate with employees and business partners about how the Code and other policies apply to their daily work.
- » Be proactive. Look for opportunities to discuss and address ethical dilemmas and challenging situations with others.
- » Respond quickly and effectively. When a concern is brought to your attention, treat it seriously and with due respect for everyone involved.
- » Be aware of the limits of your authority. Do not take any action that exceeds your authority. If you are ever unsure of what is appropriate (and what isn't), discuss the matter with your manager.
- » Delegate responsibly. Never delegate authority to any individual whom you believe may engage in unlawful conduct or unethical activities.

Remember: No reason, including the desire to meet business goals, should ever be an excuse for violating our Code, our policies or the law.



## Guidelines for Ethical Decision-making

Our compliance policies establish the framework for making ethical decisions and operating our business in a compliant manner. As you think about any interaction with the healthcare community, use this model to help guide your decisions.



### Stop and Think

- What is the purpose or your task/deliverable?
- Is it aligned with the company strategy, and does it support a legitimate business need?



### Review the Facts

- What policy(ies) does this activity support, and do you know how to apply the policy?
- Have you reviewed the principles section of this guidance?



### Align and Ask

- When in doubt on any requirement of our policy(ies), ask your manager or reach out to Compliance for guidance.



- **PERCEPTION:** Have you considered what the perception of your actions will be to the healthcare community, patients, the Government?

Remember, in any situation, under any circumstances, it is always appropriate to ask for help.

## Asking Questions, Reporting Concerns

If you see or suspect a violation of our Code, our policies or the law, or if you have a question about what to do, talk to your manager.

If you're uncomfortable speaking with your manager, there are other resources available to help you:

- » Contact another member of management.
- » Contact Human Resources or Legal and Compliance Department.
- » Contact the Business Conduct Helpline



via phone: [833-222-7543](tel:833-222-7543)



via website: [lexpharma.ethicspoint.com](https://lexpharma.ethicspoint.com)

Lexicon will make every reasonable attempt to ensure that your concerns are addressed appropriately.



### *What to Expect When You Use the Business Conduct Helpline*

The Helpline web portal and phone line are available 24 hours a day, seven days a week. Trained specialists from an independent third-party provider of corporate compliance services, will answer your call, document your concerns and forward a written report to Lexicon for further investigation.

When you contact the Helpline, you may choose to remain anonymous where allowed by local law. All reports will be treated equally whether they are submitted anonymously or not.

After you make a report, you will receive an identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information in order to conduct an effective investigation. This identification number will also enable you to track the resolution of the case; however, please note that out of respect for privacy, Lexicon will not be able to inform you about individual disciplinary actions.

Any report you make will be kept confidential by all individuals involved with reviewing and, if necessary, investigating it.

Remember, an issue cannot be addressed unless it is brought to someone's attention.



## What if?

Someone misuses the Business Conduct Helpline, makes an anonymous call and falsely accuses someone of wrongdoing.

*Experience has shown that the Helpline is rarely used for malicious purposes, but it is important to know that we will follow up on reports, and anyone who uses the Helpline in bad faith to spread falsehoods, threaten others or damage another person's reputation, will be subject to disciplinary action.*



### Find Out More .....



» [Non-Discrimination/Anti-Harassment/No Retaliation Policy](#)

» [Open Door and Fair Investigation Policy](#)

## Our Commitment to Non-retaliation

We will not tolerate any retaliation against any employee who, in good faith, asks questions, makes a report about suspected violations of our Code, our policies or the law, or assists in an investigation of suspected wrongdoing.

Reporting “in good faith” means making a genuine attempt to provide honest, complete and accurate information, even if it later proves to be unsubstantiated or mistaken.



## What if?

I suspect there may be some unethical behavior going on in my business function involving my manager. I know I should report my suspicions, and I'm thinking about using the Business Conduct Helpline, but I'm concerned about retaliation.

*You are required to report misconduct and, in your situation, using the Helpline is a good option. We will investigate your suspicions and may need to talk to you to gather additional information. After you make the report, if you believe you are experiencing any retaliation, you should report that as well. We take claims of retaliation seriously. Reports of retaliation will be thoroughly investigated and, if they are true, retaliators will be subject to discipline, up to and including termination of employment.*



**Find Out More .....**



» [Non-Discrimination/Anti-Harassment/No Retaliation Policy](#)

## Accountability and Discipline

Violating our Code, our policies or the law, or encouraging others to do so, exposes our Company to liability and puts our reputation at risk.

Anyone who violates our Code will be subject to disciplinary action, up to and including termination of their employment with Lexicon. You should also understand that violations of laws or regulations may result in legal proceedings and penalties including, in some circumstances, criminal prosecution.

Find Out More .....



» [Non-Discrimination/Anti-Harassment/No Retaliation Policy](#)



## Advancing Diversity and Inclusion

Lexicon helps bring together employees with a wide variety of backgrounds, skills and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results.

Our coworkers, job applicants and business partners are entitled to respect and should be judged on the basis of their qualifications, demonstrated skills and achievements.

We support laws prohibiting discrimination based on protected characteristics such as a person's race, color, gender, national origin, age, religion, disability, veteran status, marital status or sexual orientation.



### **We Do the Right Thing .....**

- » Treat others respectfully and professionally.
- » Promote diversity in hiring and other employment decisions.
- » Do not discriminate against others on the basis of any characteristic protected by law or Company policy.

### **Watch Out For .....**



- » Comments, jokes or materials, including emails, which others might consider offensive.
- » Inappropriate bias when judging others. If you manage others, judge them on performance. Use objective, quantifiable standards and avoid introducing unrelated considerations into your decisions.

### **Find Out More .....**



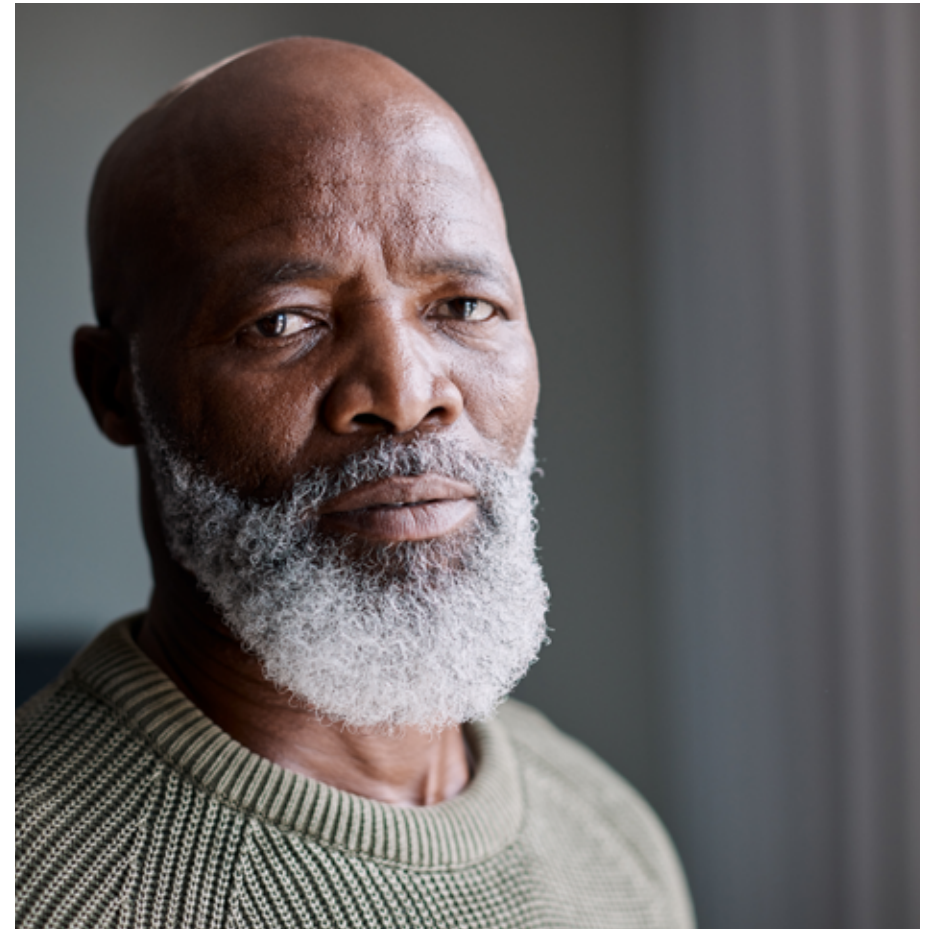
- » [Non-Discrimination/Anti-Harassment/No Retaliation Policy](#)



## What if?

One of my coworkers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

*You should notify your manager or Human Resources. Sending these kinds of jokes violates our values as well as our policies that relate to diversity, harassment and discrimination. By doing nothing you are condoning discrimination and tolerating beliefs that can seriously erode the team environment that we have all worked to create.*



## Supporting a Harassment-free Workplace

We all have the right to work in an environment that is free from intimidation, harassment, bullying and abusive conduct. Verbal or physical conduct by any employee that harasses another, disrupts another's work performance or creates an intimidating, offensive, abusive or hostile work environment will not be tolerated.



### *At Lexicon, We Do Not Tolerate:*

- » Threatening remarks, obscene phone calls, stalking or any other form of harassment (including when using social media platforms – see our [Social Media Policy](#)).
- » Intentionally damaging someone else's property or acting aggressively in a manner that causes someone else to fear injury.
- » Threatening, intimidating or coercing others on or off the premises – at any time, for any purpose.

### *Sexual Harassment*

A common form of harassment is sexual harassment, which in general occurs when:

- » Actions that are unwelcome are made a condition of employment or used as the basis for employment decisions such as a request for a date, a sexual favor or other similar conduct of a sexual nature.
- » An intimidating, offensive or hostile work environment is created by unwelcome sexual advances, insulting jokes or other offensive verbal or physical behavior of a sexual nature.

**We Do the Right Thing .....**

- » Help each other by speaking out when a coworker's conduct makes others uncomfortable.
- » Never tolerate sexual harassment including requests for sexual favors, or other unwelcome verbal or physical conduct of a sexual nature.
- » Demonstrate professionalism. Do not visit inappropriate internet sites or display sexually explicit or offensive pictures.
- » Promote a positive attitude toward policies designed to build a safe, ethical and professional workplace.
- » Report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.

**Watch Out For .....**

- » Unwelcome remarks, gestures or physical contact.
- » The display of sexually explicit or offensive pictures or other materials.
- » Sexual or offensive jokes or comments (explicit or by innuendo) and leering.
- » Verbal abuse, threats or taunting.

**Find Out More .....**

- » [Non-Discrimination/Anti-Harassment/No Retaliation Policy](#)





## Maintaining Health and Safety

Ensuring safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others.

We can only achieve our goal of a safe and healthy workplace through the active participation and support of everyone. Situations that may pose a health, safety or environmental hazard should be reported immediately. All reports can be made without fear of reprisal.

Safety is a condition of employment, and we expect the commitment of each director, officer and employee to make Lexicon an accident-free workplace.

### ***Alcohol and Drugs***

While at work or on Company business:

- » You should be always ready to carry out your work duties – never impaired.
- » Do not use, possess or be under the influence of illegal drugs or any substance that could interfere with a safe and effective work environment or harm our Company's reputation.

### ***Workplace Violence***

Violence of any kind has no place at Lexicon. We won't tolerate:

- » Intimidating, threatening or hostile behavior.
- » Causing physical injury to another.
- » Acts of vandalism, arson, sabotage or other criminal activities.
- » The carrying of weapons onto Company property unless you are authorized to do so.
- » Possession of a firearm, explosive or other dangerous weapon on Lexicon premises or use of an object as a weapon.
- » Inflicting or threatening injury or damage to another person's life, health, well-being, family or property.





## We Do the Right Thing

- » Follow the safety, security and health rules and practices that apply to your job.
- » Maintain a neat, safe working environment by keeping workstations, aisles and other workspaces free from obstacles, wires and other potential hazards.
- » Notify your manager immediately about any unsafe equipment or any situation that could pose a threat to health or safety or damage the environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.



## Watch Out For .....

- » Unsafe practices or work conditions.
- » Carelessness in enforcing security standards, such as facility entry procedures and password protocols.



## What if?

I've noticed some practices in my area that don't seem safe. Is there someone I can speak to? I'm new here and don't want to be considered a troublemaker.

*Discuss your concerns with your manager or Human Resources. There may be very good reasons for the practices, but it's important to remember that raising a concern about safety does not make you a troublemaker. It makes you a responsible employee concerned about the safety of others.*



**Find Out More .....**



» [Occupational Health, Safety and Security Policy](#)

## Protecting Our Assets

Each of us is entrusted with Lexicon assets and is personally responsible for protecting them and using them with care. Company assets include funds, facilities, equipment, information systems, intellectual property and confidential information.

Personal use of Company assets is discouraged, but where permitted, should be kept to a minimum and have no adverse effect on productivity and the work environment.



### **We Do the Right Thing .....**

- » Do not use Lexicon equipment or information systems to create, store or send content that others might find offensive.
- » Do not share passwords or allow other people, including friends and family, to use Lexicon resources.
- » Only use software that has been properly licensed. The copying or use of unlicensed or “pirated” software on Lexicon computers or equipment to conduct Company business is strictly prohibited. If you have any questions about whether or not a particular use of software is licensed, contact the IT Department.



### **Watch Out For .....**



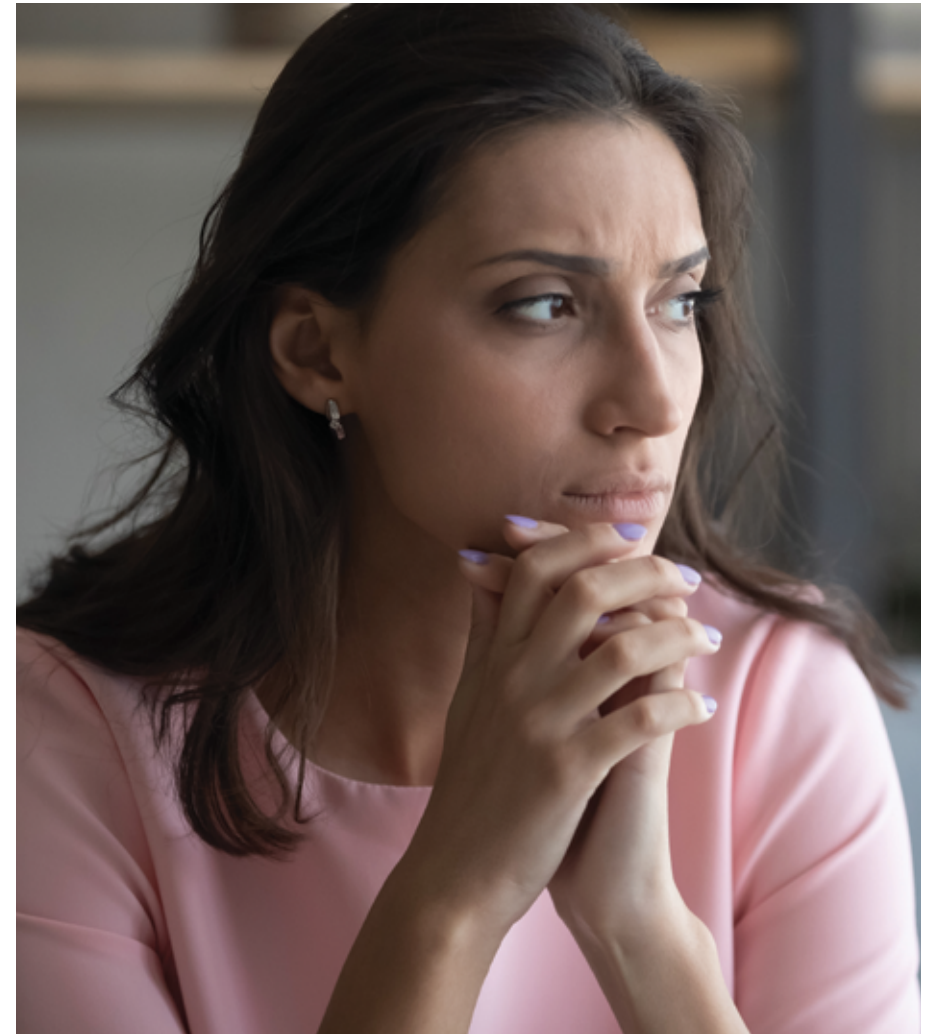
- » Requests to borrow or use Lexicon equipment without approval.
- » Unknown individuals without proper credentials entering our facilities.
- » Excessive use of our resources for personal purposes.



## What if?

I'm concerned that my manager may be stealing from the Company. I'm not sure, and I don't want to accuse anyone falsely. Should I say something about my suspicions? I don't want to lose my job if I'm mistaken.

*You should report your concerns to any member of management or the Legal and Compliance Department or contact the Business Conduct Helpline. You may remain anonymous if you wish. Lexicon will investigate your concern, gather supporting evidence and take appropriate action. As a company, we prohibit all forms of retaliation and are committed to providing a safe reporting environment – when you raise a concern in good faith to protect the Company, you, in turn, are protected.*



**Find Out More .....**



» [Information Security Policy](#)

## Safeguarding Confidential Information and Intellectual Property

Lexicon commits substantial resources to technology development and innovation. The creation and protection of our intellectual property rights are critical to our business. Intellectual property includes items such as proprietary information, trade secrets and patents.

Each of us must be vigilant and protect confidential information and intellectual property, whether it belongs to Lexicon or to our customers, business partners or others. This means keeping it secure, limiting access to those who have a need to know in order to do their job and only using it for authorized purposes.



### *Intellectual Property*

Intellectual property (IP) is an important asset that must be protected. Examples of our IP include:

- » Business and marketing plans
- » Company initiatives (existing, planned, proposed or developing)
- » Customer lists
- » Trade secrets and discoveries
- » Methods, know-how and techniques
- » Innovations and designs
- » Systems, software and technology
- » Patents, trademarks and copyrights

Contact the Legal and Compliance Department if you receive any statements or questions from third parties regarding (1) the scope of Lexicon intellectual property rights, (2) the applicability of Lexicon rights to another company's products or (3) the applicability of a third party's intellectual property rights to Lexicon intellectual property rights or products.

Promptly disclose to management any inventions or other IP that you create while you are employed by Lexicon.

Be aware that the obligation to restrict your use of Lexicon confidential information and intellectual property continues even after employment ends.

**We Do the Right Thing .....**

- » Properly label confidential information to indicate how it should be handled, distributed and destroyed.
- » Use and disclose confidential information only for legitimate business purposes.
- » Protect our intellectual property and confidential information by sharing it only with authorized parties.
- » Only store or communicate Company information using Lexicon information systems.
- » Understand the expectations of customers and business partners regarding the protection, use and disclosure of the confidential information that they provide to us.
- » Limit access to third-party confidential information to those persons who have a need to know in order to do their job, and only for authorized purposes.
- » Immediately report loss or theft of confidential information to your manager.

**Watch Out For .....**

- » Discussions of Lexicon confidential information in places where others might be able to overhear – for example on planes and elevators and when using mobile phones.
- » Sending confidential information to unattended fax machines or printers.

**Find Out More .....**

- » [Insider Trading and Confidentiality Policy](#)
- » [Information Security Policy](#)



## Protecting Privacy

We respect the personal information of others. Follow our policies and all applicable laws and regulations in collecting, accessing, using, storing, sharing and disposing of sensitive information. Only use it – and share it with others outside of Lexicon – for legitimate business purposes.

Make sure you know the kind of information that is considered personal information. It includes anything that could be used to identify someone, either directly or indirectly, such as a name, email address, phone number or credit card number.



### *Privacy and HIPAA*

Lexicon complies with laws such as the Health Insurance Portability and Accountability Act (HIPAA) and the EU General Data Protection Regulation (GDPR) which protect the privacy of personally identifiable information (PII) and protected health information (PHI). We collect only the minimum PHI or PII needed to perform our work and use it only for legitimate business purposes.

- » PII is information that can be used to trace someone's identity or can be combined with other personal information to do so (for example, a name, address, social security number, driver's license number or account number).
- » PHI is a specific type of personal information that identifies an individual and relates to a person's physical or mental health, treatment or payment for healthcare.





**We Do the Right Thing .....**

- » Apply the following principles to ensure protection of personal information:
  - ◇ Give notice and/or obtain consent when collecting, processing, transferring and storing an individual's personal information when appropriate and in accordance with the law.
  - ◇ Collect, use and otherwise process personal information for legitimate business purposes only.
  - ◇ Maintain personal information only as long as necessary for the purpose collected and to comply with our legal obligations.
  - ◇ Take adequate precautions to safeguard personal information.
  - ◇ Restrict access to personal information to those who are authorized and have a legitimate need for it.
  - ◇ Where appropriate, allow data subjects to review and correct information held by Lexicon.
  - ◇ Properly destroy records containing personal information according to Lexicon's document retention guidelines.
  - ◇ Ensure that any third party working on behalf of Lexicon and will have access to patient data has a validated system of protecting the data and can adhere to the above principles.

**Watch Out For .....**

- » Sending sensitive information to unattended fax machines or printers.
- » Failing to shred or securely dispose of sensitive information.
- » Using "free" or individually purchased internet hosting, collaboration or cloud services.

**Find Out More .....**

- » [Internal Global Privacy Policy](#)
- » [General Data Protection Regulation Policy](#)
- » [Information Security Policy](#)



## Promoting Financial Integrity

The accuracy and completeness of our disclosures and business records are essential to making informed decisions and to supporting investors, regulators and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some employees have special responsibilities in this area. If you are involved in any aspect of our financial reporting, make sure you meet all applicable procedural and legal requirements. Take care to ensure reports or disclosures about our financial records are full, fair, accurate, complete, objective and timely and never falsify or mischaracterize any book, record, account, entry or transaction that relates to Lexicon.

### ***Records Management***

Documents should only be disposed of in compliance with Lexicon policies and should never be destroyed or hidden. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to – or in anticipation of – an investigation or audit.

If you have any questions or concerns about retaining or destroying corporate records, please contact the Legal and Compliance Department.

Remember, everyone at Lexicon contributes to the process of recording business results and maintaining records. Whether you are filing an expense report, preparing a financial statement or simply completing a time sheet, be honest, accurate and complete.

### **We Do the Right Thing .....**



- » Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.
- » Write carefully in all of your business communications. Write as though someday the records you create may become public documents.

### **Watch Out For .....**



- » Records that are not clear and complete or that obscure the true nature of any action.
- » Undisclosed or unrecorded funds, assets or liabilities.
- » Improper destruction of documents.



## What if?

At the end of the last quarter reporting period, my manager asked me to record additional expenses, even though I had not yet received the invoices from the supplier and the work has not yet started. I agreed to do it, since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.

*No, that was not the correct course of action. Costs must be recorded in the period in which they are incurred. The work was not started, and the costs were not incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could be considered fraud.*



Find Out More .....



» [Records Management and Retention Policy](#)

## Cooperating With Investigations and Audits

All employees are expected to fully cooperate with internal and external investigations and audits that are conducted by our Company. In addition, in the course of business, you may receive inquiries or requests from government officials.

You are expected to fully cooperate and ensure that information you provide is true, accurate and complete. If you learn of a potential government investigation or inquiry, immediately notify your manager and Legal and Compliance Department before taking or promising any action.



### Watch Out For .....

- » Falsified information. Never destroy, alter or conceal a document in anticipation of or in response to a request for these documents.
- » Unlawful influence. Never provide or attempt to influence others to provide incomplete, false or misleading statements to a Company or government investigator.



### Find Out More.....

- » [Open Door and Fair Investigation Policy](#)

## Avoiding Conflicts of Interest

A conflict of interest can occur whenever you have a competing interest that may interfere with your ability to make an objective decision on behalf of Lexicon. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, which can undermine the trust others place in us and damage our reputation.

Conflicts of interest may be actual, potential or even just a matter of perception. Since these situations are not always clear-cut, you need to fully disclose them to your manager so that we can properly evaluate, monitor and manage them.

### We Do the Right Thing .....



- » Avoid conflict of interest situations whenever possible.
- » Always make business decisions in the best interest of Lexicon.
- » Discuss with your manager full details of any situation that could be perceived as a potential conflict of interest.
- » Think ahead and proactively address situations that may put your interests or those of a family member in potential conflict with our Company.

Be alert to situations, including the following, which are common examples of potential conflicts of interest:

### ***Corporate opportunities***

If you learn about a business opportunity because of your job, it belongs to Lexicon first. This means that you should not take that opportunity for yourself unless you get approval from Human Resources or the Legal and Compliance Department.

### ***Friends and relatives***

On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a customer, supplier or competitor. Since it is impossible to anticipate all situations that may create a potential conflict, you should disclose your situation to your manager in order to determine if precautions need to be taken.

### ***Outside employment***

To ensure that there are no conflicts and that potential issues are addressed, you always need to disclose and discuss outside employment with your manager. If approved, you must ensure that the outside activity does not interfere with your work at Lexicon. Working for a competitor, supplier or customer may raise conflicts that will need to be resolved. Also, any approved side or personal business should not compete with our Company.

### ***Personal investments***

A conflict can occur if you have a significant ownership or other financial interest in a competitor, vendor, supplier or customer. Make sure you know what's permitted – and what's not – by our policies and seek help with questions.

### ***Civic activities***

Unless Company management specifically asks you to do so, you shouldn't accept a seat on the board of directors or advisory board of our competitors, suppliers, customers or partners, especially if your current job gives you the ability to influence our relationship with them.

**Find Out More .....**



» [Conflicts of Interest Policy](#)



## Knowing the Rules About Gifts and Entertainment

A modest gift may be a thoughtful “thank you,” or a meal may be an appropriate setting for a business discussion. If not handled carefully, however, the exchange of gifts and entertainment may appear to create a conflict of interest or suggest other misconduct and, when it comes to interactions with healthcare professionals or other healthcare entities, may violate applicable laws and regulations.



### ***When it comes to Business Courtesies to Healthcare Professionals.***

Except for very specific situations that are described in our policies, we do not offer payments, gifts or anything else of value to healthcare professionals. Refer to – and comply strictly with – our policies.



### ***When it comes to Government Officials.***

Laws around the world may vary, but for us it’s simple: We do not offer payments, gifts or anything else of value to government officials without obtaining authorization in advance from the Legal and Compliance Department.



### ***When it comes to suppliers and other business partners.***

Only give and accept gifts and entertainment that are nominal in value, foster goodwill in business relationships and:

- » Comply with the policies of both the giver and receiver.
- » Are not cash or cash equivalents.
- » Would not embarrass you or our Company (e.g., entertainment at sexually oriented establishments).
- » Do not obligate – or appear to obligate the recipient.
- » Be sure that anything of any value, given or received, is recorded in our Company books and records.

## Find Out More .....



- » [Interactions with the Healthcare Community](#)



## What if?

During contract negotiations with a potential new supplier, the supplier mentions that they have a complimentary registration to a local business seminar. They are unable to attend and asked if I would like to go in their place. I had been thinking of attending the seminar anyway, since the subject of the seminar applies to my work. There's no personal gain to me, it would be good for Lexicon, and it would be a shame to waste the registration. I planned on saying "yes," but now I wonder if that would be the right decision.

*You should decline the offer. If you are involved in contract negotiations, you must never accept any gifts while the negotiation process is ongoing. Accepting gifts during negotiations can give the appearance of something improper and is always inappropriate.*



## Speaking on Behalf of Lexicon

We are committed to maintaining honest, professional and lawful internal and public communications.

We need a consistent voice when making disclosures or providing information to the public. For this reason, it is important that only authorized persons speak on our Company's behalf. Communications with media, investors, stock analysts and other members of the financial community should be referred to executive management.



### Watch Out For .....

- » Giving public speeches, writing articles for professional journals or other public communications that relate to Lexicon without appropriate management approval.
- » The temptation to use your title or affiliation outside of your work for Lexicon without it being clear that the use is for identification only.
- » Invitations to speak "off the record" to journalists or analysts who ask you for information about Lexicon or its customers or business partners.



### Find Out More.....

- » [Corporate Communications Policy](#)
- » [Social Media Policy](#)
- » [Social Media FAQs](#)

### ***Full, Fair and Timely Disclosures***

As a public company, Lexicon is committed to meeting its obligations of full, fair and timely disclosure in all reports and documents that describe our business and financial results and other public communications.

### ***Social Media***

If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of Lexicon.

If you believe a false statement about our Company has been posted, do not post or share nonpublic information, even if your intent is to "set the record straight." Your posting might be misinterpreted, start false rumors or may be inaccurate or misleading. Instead, contact Corporate Communications or the Legal and Compliance Department.





## Complying With Healthcare Requirements

We comply with all applicable laws and regulatory requirements that relate to the development, manufacture, distribution and promotion of drugs and interactions with healthcare professionals. It is never acceptable to try to influence purchasing decisions in a way that is unethical, inappropriate, illegal or creates a potential conflict of interest. We are honest, open and up-front when we interact with those who may be interested in buying or prescribing our products.



### We Do the Right Thing

- » Understand how these laws apply to your job and ask for guidance from your manager or the Legal and Compliance Department if you are ever unsure of the proper course of action.
- » If you are in a situation outside the United States where local regulations, rules or laws seem to conflict with our Code or applicable U.S. regulations, consult your manager or seek guidance from the Legal and Compliance Department.



### Find Out More.....

- » [Interactions with the Healthcare Community](#)

### *The Laws That Apply to Our Business*

We abide by all laws, regulations, policies and procedures that apply to our jobs, including:

- » The [U.S. Anti-kickback Statute \(AKS\)](#). We don't give anything of value to induce a healthcare professional to use or recommend pharmaceutical products that are paid for or reimbursed by the government.
- » The [U.S. False Claims Act \(FCA\)](#) and similar laws in other countries. We don't submit or cause the submission of false claims for healthcare reimbursement to the government.
- » The [Food, Drug and Cosmetic Act \(FDCA\)](#) and similar laws in other countries. We don't promote a regulated product or an indication that has not received Food and Drug Administration (FDA) or other appropriate regulatory approval.
- » Transparency Laws. We report certain payments to physicians and other customers, as required by transparency laws and regulations in every location where we operate.
- » The [U.S. Foreign Corrupt Practices Act \(FCPA\)](#), the [UK Bribery Act \(UKBA\)](#) and similar laws in other countries. We do not participate in bribery or corruption and adhere to all local laws and regulations that cover bribery and corruption.

## Interacting With Healthcare Professionals

We put patients first. In our interactions with healthcare professionals, we promote patient welfare by observing good business practices, meeting industry standards and complying with Lexicon policies.

We also comply with federal and state laws that govern our relationships with healthcare professionals, including the U.S. Anti-kickback Statute and the Stark Law. Make sure that all interactions are professional and serve a legitimate business purpose, and never engage in conduct that could even suggest the appearance of improperly influencing a healthcare professional's decision.

### ***Healthcare Professionals ...***

Include: individuals in a position to directly or indirectly purchase, recommend, use or prescribe any Lexicon product; any customer or potential customer in a position to recommend Lexicon products, or; any person licensed to practice medicine (examples include, but are not limited to: physicians, nurses, pharmacists, payers and CEOs/CFOs of healthcare institutions).



## We Do the Right Thing .....



- » Never pay or offer to pay anyone to refer a patient for treatment. If you are offered any kind of payment for a patient referral, turn it down.
- » Do not offer or give anything of value to influence or reward prescribing, using, purchasing, leasing or recommending certain products.

## Watch Out For .....



- » Gift-giving – federal and state laws and our policies strictly limit what we may give to or receive from healthcare professionals in the way of gifts, entertainment, promotional items and other hospitality and business courtesies. If you have questions as to whether a gift is appropriate, you should seek guidance from the Legal and Compliance Department.
- » Improper influence – don't interfere with a healthcare professional's independent judgment.

## Find Out More .....



- » [Interactions with the Healthcare Community](#)

## Interacting With Suppliers and Third Parties

Lexicon evaluates and engages with qualified suppliers (including vendors) on an objective basis grounded in fairness. When selecting suppliers, we assess each supplier's ability to satisfy our business and technical needs and requirements. We also make purchasing decisions based on the long-term cost and benefit to Lexicon. All agreements are negotiated in good faith and must be fair and reasonable for both parties.

### We Do the Right Thing .....



- » Ensure that any proposed supplier or third party is not listed on any Government debarment lists.
- » Base compensation for services on applicable fair market value (FMV) rates.
- » Make sure an executed contract with an approved scope of work is in place before work begins on a project.



## Guarding Against Fraud, Waste and Abuse

Lexicon is committed to the integrity of the healthcare system and to detecting, correcting and preventing false claims. As part of this commitment, we expect our employees to be able to recognize and report instances of fraud, waste and abuse.

Each of us has a responsibility to ensure payments and transactions are properly authorized and fully and accurately recorded in compliance with all applicable laws and Lexicon policies.



### We Do the Right Thing

- » Complete all required training and know the definitions of “fraud,” “waste” and “abuse.”
- » Ensure timely and accurate documentation and coding and billing that reflect services ordered and actually performed.
- » Only bill for services we actually provide.
- » Promptly report any instances of suspected fraud, waste or abuse.



### Find Out More.....

- » [Anti-Corruption Policy](#)

## Watch Out For .....



- » Activities that constitute fraud, waste or abuse, such as:
  - ◇ Billing for services, procedures or supplies that have not actually been provided.
  - ◇ Providing services to patients that are not medically necessary.
  - ◇ Forging a physician’s signature to obtain pharmaceuticals.
  - ◇ Intentionally misrepresenting or manipulating information to receive payment for services that were not provided.
- » Lack of supporting documentation, where it is required.



## Following Research Protocols

Research is a critical component of healthcare delivery and is at the heart of all medical advances.

The research we conduct is not only scientifically beneficial but also upholds the ethical principles of human subject research.

Research we conduct must be approved in advance by Medical Affairs and the Legal and Compliance Departments, and participant enrollment in any research study (or clinical trial) must be voluntary.

We are dedicated to the ethical and responsible treatment of all animals used in the development of our products. We work to replace the use of live animals, reduce the number of animals used and refine our procedures to minimize distress, whenever scientifically valid and acceptable to regulators and expect our suppliers to comply with all of the applicable laws and regulations that we do, when they conduct animal-based research on our behalf.



### ***Research Misconduct***

Lexicon will not tolerate research misconduct of any kind. That includes:

- » **Fabrication** – making up data or results and recording or reporting the fabricated information.
- » **Falsification** – manipulating research materials, equipment or processes or changing or omitting data or results to misrepresent the research.
- » **Plagiarism** – using another person’s ideas, processes, results or words without giving appropriate credit.





## We Do the Right Thing

- » Review and follow all policies regarding the proposal, approval, conduct and reporting of research.
- » Watch for research-related billing errors by helping us carefully determine the right coding and billing assignment when research participants are involved.
- » Honor the terms of research funding that we receive. Make sure those funds are used responsibly – that any use is necessary, reasonable, authorized and well-documented.
- » Direct research-related questions (that your team can't answer) or participant complaints to the Medical Affairs or Legal and Compliance Departments.



## Watch Out For .....

- » Situations that could lead to conflicts. Avoid any relationship or activity that could influence or appear to influence your ability to protect research participants or compromise the validity of research results.
- » Possible misconduct.



## What if?

I realized I made a mistake in recording data for one research subject, but the data was not final. Is that considered misconduct?

*No. Making a mistake is not intentional misconduct. It would be if you knowingly included the data in the final results. If you become aware of a mistake, correct the data appropriately and notify the study principal investigator.*



**Find Out More .....**



» [Records Management and Retention Policy](#)

## Ethical Marketing and Promotional Activities

Our Company's advertising and promotion efforts focus on conveying useful information to healthcare professionals, patients and customers. We comply with all laws and regulations that govern our marketing activities and only promote our pharmaceutical products for uses that have been approved or authorized by appropriate government or regulatory agencies, (e.g., we don't promote in the United States a use that has been approved by another country's government but not the U.S. government).



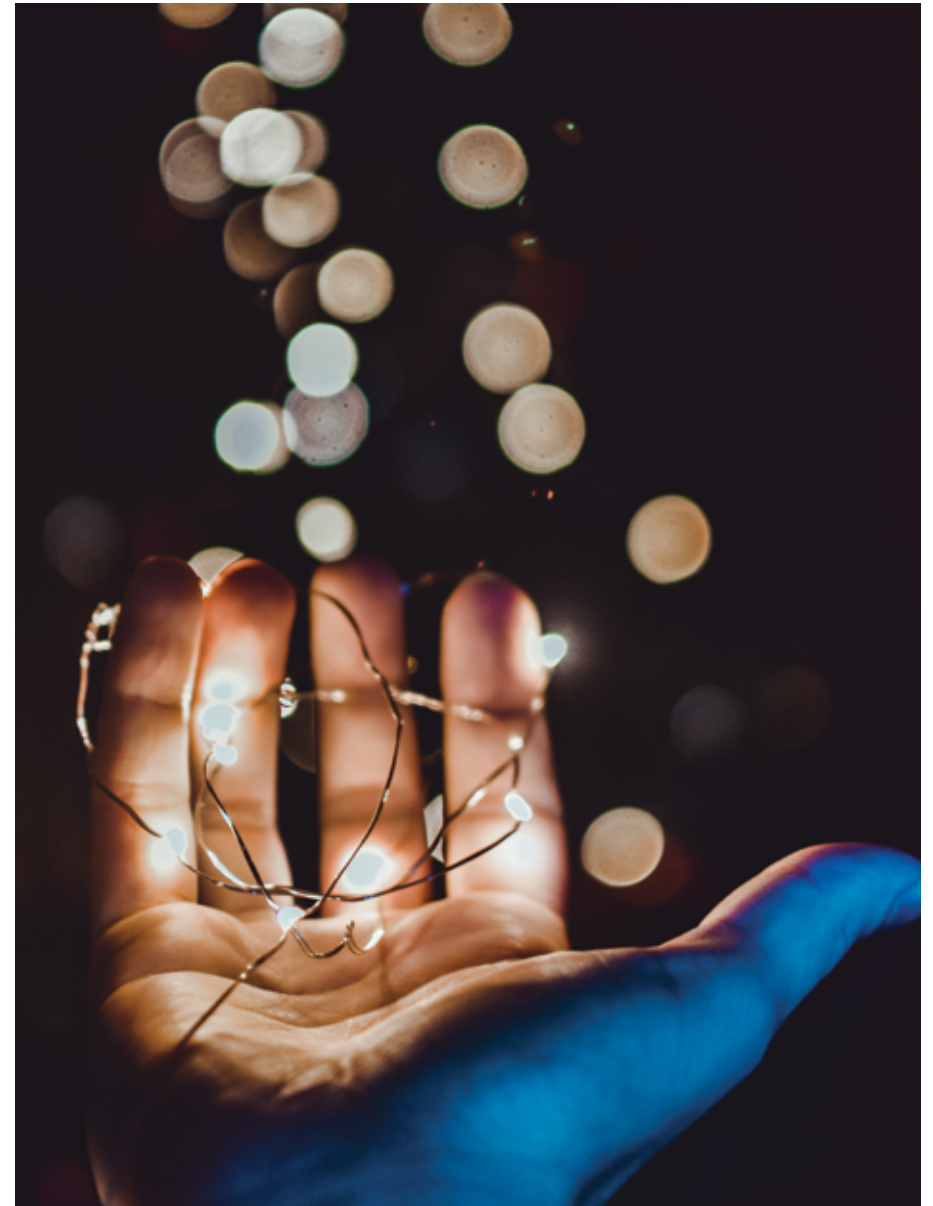
### We Do the Right Thing

- » Make sure our promotional materials and communications are:
  - ◇ Accurate, fairly balanced and substantiated
  - ◇ Grounded in scientific evidence and accepted medical practice
  - ◇ Compliant with government-approved labeling rules in the countries where we operate



### Find Out More.....

- » [Interactions with the Healthcare Community](#)
- » [Food, Drug and Cosmetic Act \(FDCA\)](#)





## Promoting Product Safety and Quality

We develop our products with patient communities in mind and are dedicated to ensuring they receive safe, high-quality products and therapies. Our commitment to safety and quality has allowed us to earn the trust of patients and physicians around the world.

### *How We Inspire Trust*

We deliver on our promises and ensure that we meet the highest standards by:

- » Innovating our processes and operations everywhere we do business.
- » Following the most stringent guidelines applicable.
- » Testing our products to ensure that only those of the highest quality reach the market.
- » Evaluating the performance of our products throughout their life to ensure quality and reliability.



**Find Out More** .....

» [Reporting Adverse Events Policy](#)

### *Adverse Events*

We have an obligation to report any issue that could compromise the quality or safety of the products we provide to healthcare professionals or patients. If you see, suspect or become aware of a situation that is unsafe, doesn't comply with our quality policies or procedures, or could adversely affect any of our products, you have a responsibility to immediately bring it to the attention of Lexicon's Pharmacovigilance Department within 24 hours by emailing [drugsafetygeneral@lexpharma.com](mailto:drugsafetygeneral@lexpharma.com). By acting quickly, you help us to address and correct any issue before it presents a risk to those we serve.

### **We Do the Right Thing** .....



- » Help us continue producing quality products by always making patient safety a priority, adhering to the highest standards and never sacrificing quality to meet a Company target or deadline.
- » If you see or suspect activity that goes against our commitment, speak up by contacting your manager or the Compliance Helpline, 24/7, via:
  - ♦ Phone: [833-222-7543](tel:833-222-7543)
  - or
  - ♦ Website: [lexpharma.ethicspoint.com](http://lexpharma.ethicspoint.com)

## What if?

I think there may be an issue with one of the manufacturing processes at my facility, but we are behind schedule and if I say anything, we will be delayed further as the Company investigates. What should I do?

*Lexicon never sacrifices quality to meet a deadline or target. You should report the matter immediately.*



## Being a Good Corporate Citizen

We believe in making a positive difference in people’s lives and maintaining the health and welfare of the communities where we live and work. We promote, encourage and support a diverse range of corporate social responsibility activities. You are encouraged to get involved in the many initiatives we support.

We also encourage you to make a difference on a personal level, but, in general, ask that you do so on your own time and at your own expense, making sure that your activities are lawful and consistent with our policies. Unless you receive approval in advance, please do not use Lexicon funds, assets or the Lexicon name to further your personal volunteer activities.



**Find Out More.....**

» [No Solicitation/No Distribution Policy](#)



## Participating in Political Activities

You have the right to voluntarily participate in the political process, including making personal political contributions. However, you must always make it clear that your personal views and actions are not those of Lexicon, and never use Company funds for political purpose without proper authorization.



### We Do the Right Thing .....



- » Ensure that your personal political views and activities are not viewed as those of the Company.
- » Do not use our resources or facilities to support your personal political activities.

### Watch Out For .....



- » Lobbying. Interactions with government officials or regulators that could be seen as lobbying must be discussed in advance and coordinated with the Legal and Compliance Department.
- » Pressure. Never apply direct or indirect pressure on another employee to contribute to, support or oppose a political candidate or party.
- » Improper influence. Avoid even the appearance of making political or charitable contributions in order to gain favor or in an attempt to exert improper influence.
- » Conflicts of interest. Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties at Lexicon.

## What if?

I will be attending a fundraiser for a candidate running for local office. Is it OK to mention my position at Lexicon as long as I don't use our Company's funds or resources?

*No. It would be improper to associate our name in any way with your personal political activities.*



**Find Out More .....**



» [Corporate Communications Policy](#)

» [Social Media Policy](#)

» [No Solicitation/No Distribution Policy](#)

## Preventing Bribery and Corruption

We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs. Lexicon is committed to complying with all applicable anti-corruption laws.

We do not pay or accept bribes or kickbacks, at any time for any reason. This applies equally to any person or firm who represents Lexicon. The only possible exception is if a potentially improper payment is necessary to protect an individual's health or safety. In such a situation, you should immediately report the payment to the Legal and Compliance Department or the Business Conduct Helpline.



### ***Key Definitions - Bribery, Corruption and Facilitation Payments***

***Bribery*** means giving or receiving anything of value (or offering to do so) in order to obtain a business, financial or commercial advantage.

***Corruption*** is the abuse of an entrusted power for private gain.

***Facilitation payments*** are typically small payments paid to a low-level government official that are intended to encourage the official to perform his responsibilities.

It is illegal to make, offer or promise any payment or anything of value (including money, a fee, a commission, credit, a gift or compensation of any kind), directly or indirectly, for the purpose of gaining an improper business advantage or decision or favorable treatment from a government official.



It is especially important that we exercise due diligence and carefully monitor third parties acting on our behalf. We carefully screen all third parties, including suppliers, consultants and vendors who work on our Company's behalf, particularly when dealing in countries with high corruption rates and in situations where "red flags" would indicate further screening is needed before retaining the third party. Third parties must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions.



### **We Do the Right Thing**

- » Never give anything of value inconsistent with local laws and regulations to any government official. If you are not sure of the local laws, the safest course of action is to not give anything of value.
- » Understand the standards set forth under anti-bribery laws which apply to your role at Lexicon.
- » Accurately and completely record all payments to third parties.



### **Watch Out For .....**



- » Apparent violations of anti-bribery laws by our business partners.
- » Individuals acting on behalf of Lexicon who do not wish to have all terms of their engagement with Lexicon clearly documented in writing.



## What if?

I work with a foreign agent in connection with our operations in another country. I suspect that some of the money we pay him goes toward making payments or bribes to government officials. What should I do?

*This matter should be reported to the Legal and Compliance Department for investigation. If there is bribery and we fail to act, both you and Lexicon could be liable. While investigating these kinds of matters can be culturally difficult in some countries, any agent doing business with us should understand the necessity of these measures. It is important and appropriate to remind those acting on behalf of Lexicon of this policy.*



**Find Out More .....**



» [Anti-Corruption Policy](#)



## Competing Fairly

We believe in free and open competition and never engage in improper practices that may limit competition and prevent free enterprise. We never look to gain competitive advantages through unethical or illegal business practices.

### **Be Alert**

Antitrust laws are complex and compliance requirements can vary depending on the circumstances, but in general, the following activities are red flags and should be avoided and, if detected, reported to the Legal and Compliance Department:

- » Sharing our Company's competitively sensitive information with a competitor.
- » Sharing competitively sensitive information of business partners or other third parties with their competitors.
- » Attempting to obtain nonpublic information about competitors from new hires or candidates for employment.



## We Do the Right Thing .....



- » Do not enter into agreements with competitors or others to engage in anti-competitive behavior, including setting prices or dividing up customers, suppliers or markets.
- » Do not engage in conversations with competitors about competitively sensitive information.

## Watch Out For .....



- » **Collusion** – when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages or allocations of markets.
- » **Bid-rigging** – when competitors or service providers manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding or knowingly submitting noncompetitive bids.
- » **Tying** – when a company with market power forces customers to agree to services or products that they do not want or need.
- » **Predatory pricing** – when a company with market power sells a service below cost to eliminate or harm a competitor, with the intent to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.

***Always Deal Fairly***

We treat our customers and business partners fairly. We work to understand and meet their needs, while always remaining true to our own ethical standards. We tell the truth about our services and capabilities and never make promises we can't keep. In short, we treat our customers and business partners as we would like to be treated.

**We Do the Right Thing**

- » Treat each customer fairly and honestly.
- » Speak up and talk to your manager if you have concerns about any error, omission, undue delay or defect in quality or our customer service.
- » Promptly raise with a manager any potential conflict of interest between you, our customers or our Company.
- » Never follow a customer's request to do something that you regard as unethical or unlawful.
- » Be responsive to customer requests and questions. Only promise what you can deliver and deliver on what you promise.

**Watch Out For .....**

- » Pressure from colleagues or managers to cut corners on quality or delivery standards.
- » Temptations to tell customers what you think they want to hear rather than the truth; if a situation is unclear, begin by presenting a fair and accurate picture as a basis for decision-making.



***Gathering Competitive Information***

Information about competitors is a valuable asset in today's competitive business environment. When collecting business intelligence, Lexicon employees and others who are working on our behalf, must always live up to the highest ethical standards.

We must never engage in fraud, misrepresentation or deception to obtain information. Nor should we use invasive technology to "spy" on others. We also need to be careful when accepting information from third parties. You should know and trust their sources and be sure that the knowledge they provide is not protected by trade secret laws, non-disclosure or confidentiality agreements.

While Lexicon employs former employees of competitors, we recognize and respect the obligations of those employees not to use or disclose the confidential information of their former employers.

**We Do the Right Thing**

- » Obtain competitive information only through legal and ethical means, never through misrepresentation.
- » Respect the obligations of others to keep competitive information confidential.

**Watch Out For .....**

- » Retaining papers or computer records from prior employers in violation of laws or contracts.
- » Using anyone else's confidential information without appropriate approvals.
- » Using job interviews as a way of collecting confidential information about competitors or others.
- » Receiving suggestions from third parties for new products, product features or services when the source of the original idea is not fully known.

**Find Out More .....**

- » [Competitive Intelligence Policy](#)



## Avoiding Insider Trading

In the course of business, you may learn confidential information about Lexicon or about other publicly traded companies that is not available to the public at large. Trading securities while aware of such material nonpublic information, or disclosing such information to others who then trade (“tipping”), is prohibited by various laws.

### **Material Information**

Material information is the kind of information a reasonable investor would take into consideration when deciding whether to buy or sell a security. Some examples of information about a company that may be material are:

- » A proposed acquisition or sale of a business
- » A significant expansion or cutback of operations
- » A significant product development or important information about a product
- » Extraordinary management or business developments
- » Changes in strategic direction such as entering new markets

## We Do the Right Thing .....



- » Do not buy or sell securities of a company when you have material nonpublic information about that company.
- » Protect material nonpublic information from the general public including information in both electronic form and in paper copy.
- » Discuss questions or concerns about insider trading with the Legal and Compliance Department.

## Watch Out For .....



- » Requests from friends or family for information about companies that we do business with or have confidential information about. Even casual conversations could be viewed as illegal “tipping” of inside information.
- » Sharing material nonpublic information with anyone, either on purpose or by accident, unless it is essential for Lexicon-related business. Giving this information to anyone else who might make an investment decision based on your inside information is considered “tipping” and is against the law regardless of whether you benefit from the outcome of their trading.

## Find Out More .....



- » [Insider Trading and Confidentiality Policy](#)
- » [Information Security Policy](#)

## Being Alert to Money Laundering

Money laundering is a global problem with far-reaching and serious consequences. It is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Involvement in such activities undermines our integrity, damages our reputation and can expose our Company and the individuals involved to severe sanctions. Report any suspicious financial transactions and activities to the Legal and Compliance Department and, if required, to appropriate government agencies.



## Protecting the Environment

We recognize our environmental and societal responsibilities. We are committed to sustainability and to minimizing damage to the environment as well as any potential harm to the health and safety of employees, customers and the public.

### We Do the Right Thing .....



- » Do your part to ensure that protecting team member safety and the environment is a priority. Stop work and report any situation that you believe could result in an unsafe working condition or damage to the environment.
  - ◇ Read and understand all the information provided by our Company that is relevant to your job and the health, safety and environmental effects of our operations.
  - ◇ Fully cooperate with environmental, health and safety training and with our Company's periodic compliance reviews of our products and operations.
- » Be proactive and look for ways that we can minimize waste, energy and use of natural resources.
- » Contact the Legal and Compliance Department if you have questions about compliance with environmental, health and safety laws and policies.

### Find Out More .....



- » [Occupational Health, Safety and Security Policy](#)

## Honoring Our Commitment

## Act With Integrity | Make the Right Call

At Lexicon, we believe in following all applicable laws and regulations. All Lexicon employees must complete and submit this Acknowledgement Form annually and participate in all required ethics and compliance training.

Submitting this form indicates that you have read and understood our Code of Business Conduct and Ethics:

- » Have complied with the Code to the best of your knowledge.
- » Have reported any possible conflicts of interest.
- » Will contact management or use any of the reporting methods included in this Code if you have concerns related to a team member or business conduct.

Signature: \_\_\_\_\_

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

