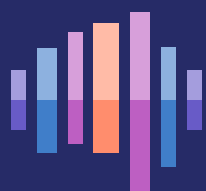


# Code of Conduct

2024



**alector**<sup>™</sup>



# Table of Contents

## Overview of Alector's Code of Conduct



Letter from Arnon.....	3
Introduction to Alector's Code of Conduct.....	5
How Our Values Reflect Our Code of Conduct.....	6
Why do we need this Code?.....	7
Who must follow the Code?.....	7
Your Responsibilities.....	7
Managers' Responsibilities.....	7
How do we make the right decision?.....	7
Where should you go with questions?.....	8
What if you see a potential violation or concern? Speak Up.....	8
Anti-Retaliation: Zero Tolerance.....	8

## How We Conduct Our Business



Research, Development, and Manufacturing of Our Products.....	10
Interactions with Healthcare Professionals and Organizations.....	11
Animal Welfare.....	11
Reporting Concerns About Alector Products.....	11
External Communications and Social Media.....	12
Anti-Bribery and Anti-Corruption (ABAC).....	13
Free and Fair Competition.....	14
Privacy and Data Protection.....	14
Political Engagement.....	14

## How We Protect Against Conflicts of Interest



What are "conflicts of interest" and how can we avoid them?.....	15
Vendor Gifts, Entertainment, Tickets, and Other Benefits.....	17
Outside Employment and Participation on Corporate and Non-Profit Boards.....	17
Avoiding Conflicting Financial Interests in Other Companies.....	18
Corporate Opportunities.....	18
Loans by Alector.....	18
Election or Appointment to Public Office.....	18
Conflicts of Interest: Questions & Answers.....	19

## How We Respect Each Other



Diversity, Equity, and Inclusion.....	21
Anti-Discrimination, Anti-Harassment.....	22
Healthy and Safe Workplace.....	22
Environmental, Social, and Governance.....	23
Human Rights.....	23

## How We Operate with Financial Integrity



Use of Company Assets, Accurate Corporate Reporting, and Record Keeping.....	25
Insider Trading.....	25
Trade Secrets, Intellectual Property, Confidential Information.....	25

### Code of Conduct Questions?

Who to Contact for More Information ... 27



## Letter from Arnon



At Alector, we're on a mission to seek treatments that improve the lives of patients, caregivers, and families who are devastated by neurodegenerative brain disorders: frontotemporal dementia, Alzheimer's or Parkinson's disease, amyotrophic lateral sclerosis and others, and various types of difficult-to-treat cancer. Ultimately, at Alector we envision a world where dementia, neurodegeneration, and cancer are illnesses of the past.

As we strive for excellence through innovation, we will act with the highest ethical principles in pursuing our mission. Each and every one of us has an obligation to comply with the applicable laws and regulations, and Alector's policies and procedures in the performance of our jobs. This obligation also compels us to uphold the values of respect, dignity, and integrity as employees of Alector.

Accordingly, this Code of Conduct is the foundation for Alector's policies, procedures, and guidelines on expected business behaviors. The Code also reminds us of our ethical and legal obligations to each other, patients, our partners, and our communities.

We are proud to be part of a company that values the highest ethical standards and empowers every Alectorian to perform with integrity, regardless of the nature of their work. I also ask you to speak up if you believe that the Code is not representing our values or our policies are not being followed. If you have any questions, contact your manager, use the Hotline by calling (877) 865-4585, or reach out to the People team or Legal team.

Thank you for doing your part to uphold and comply with the Code of Conduct, and for supporting Alector's commitment to the highest standards of ethics and compliance.





Table of  
Contents

Overview of  
Alector's Code  
of Conduct

How We  
Conduct  
Our Business

How We Protect  
Against Conflicts  
of Interest

How We  
Respect  
Each Other

How We Operate  
with Financial  
Integrity



**Sara Kenkare-Mitra, PhD**  
President and Head of Research  
and Development

**Gary Romano, MD, PhD**  
Chief Medical Officer

**Marc Grasso, MD**  
Chief Financial Officer

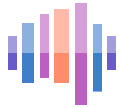




# Introduction to Alector's Code of Conduct






Alector's Code of Conduct serves as the foundation for how we perform our roles and responsibilities in accomplishing our mission. The Code is based on our corporate values, and it guides all Alector employees, officers, directors, as well as contractors and consultants acting on the company's behalf. It instructs us how to comply with the relevant laws and regulations in our business interactions, and perform in a manner that is consistent with the values of the company.





# How Our Values Reflect Our Code of Conduct

Guiding our actions

 <p><b>Own it</b> with the freedom to figure it out</p> <hr/> <p>BEHAVIOR Humble Audacity</p>	 <p><b>Never give up</b> persevere and forge a new path</p> <hr/> <p>BEHAVIOR Flexible Persistence</p>	 <p><b>Question convention</b> with the courage to challenge assumptions</p> <hr/> <p>BEHAVIOR Fearless Questioning</p>	 <p><b>Embrace feedback</b> and a growth mindset</p> <hr/> <p>BEHAVIOR Constructive Truth-telling</p>	 <p><b>Elevate each other</b> all wins are shared wins</p> <hr/> <p>BEHAVIOR Collaborative Ownership</p>
--	---	--	--	---

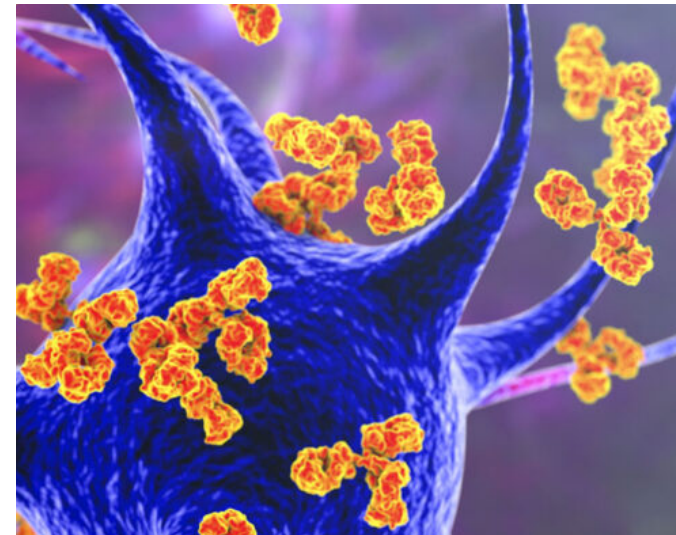
**Own it—with the freedom to figure it out:** Humble Audacity empowers us to accomplish our goals with flexibility...while being accountable for acting in a compliant manner.

**Never give up—persevere and forge a new path:** Flexible Persistence gives us the opportunity to think and execute creatively while respecting regulatory and ethical obligations.

**Question convention—with the courage to challenge assumptions:** Be unafraid to be the only person in the room to challenge the status quo.

**Embrace feedback—and a growth mindset:** Constructive Truth-Telling asks us to embrace diversity of thought and ensure that other points of view are heard and respected. Be honest, speak up, and give feedback on ethics and compliance issues.

**Elevate each other—all wins are shared wins:** Collaborative Ownership results in more meaningful and better outcomes. Our goals will be met when we encourage and support each other to achieve our goals in an ethical and compliant manner.







## Why do we need this Code?

The Code encapsulates Alector's values in how we do our work: even when difficult, we act with integrity and respect as we work with patients, healthcare providers, consumers, our partners, and communities. By understanding and following the Code, we ensure that Alector can achieve its goals and we can take pride in our achievements.

## Who must follow the Code?

All Alector employees (exempt and nonexempt), contractors and consultants, and agents acting on behalf of Alector must follow the Code of Conduct.

## Your Responsibilities

You are responsible for understanding and abiding by the Code of Conduct and will be required to review and acknowledge the Code annually as part of your employment or contract obligations.

If you see behavior or activities that you suspect are not consistent with the Code or Alector's policies and procedures, you should reach out to your manager, the People team, or the Legal team. They can work with you to determine the next steps in addressing the situation.

## Managers' Responsibilities

Alector's people managers are expected to lead by example and serve as role models to their teams. They are not only expected to understand and implement the Code in their day-to-day responsibilities, but also to guide their teams to execute consistent with the Code.

Managers must maintain open lines of communication and foster a working environment where employees feel comfortable raising issues, asking questions, and reporting complaints. Reports of noncompliance are taken very seriously, and retaliation for raising legitimate concerns will not be tolerated.

## How do we make the right decision?

We want our employees to feel empowered to make difficult judgments, and we know that it's not always easy to make the right decisions. When you're considering taking any action and weighing the risks involved, consider whether your action might violate the Code or your ethical obligations. **While making the decision, think about these questions:**

- Is it the right thing to do for patients?
- Would the action or decision violate any law, regulation, or industry standard?
- Would the action or decision violate Alector's policies, guidelines, or standards?
- Is the action consistent with Alector's values?
- Would it result in reputational harm to the company or other employees?
- Could the action or decision be viewed as unethical by others?
- How would Alector be perceived if this action were featured on the front page of a major newspaper or media outlet (eg, *The New York Times*)?



## Where should you go with questions?

If you have questions about the Code, our policies or procedures, or the laws and regulations that apply to the work that you do, first talk with your manager, the People team, or the Legal team. Please find [additional guidance](#) at the end of this Code.

## What if you see a potential violation or concern? SPEAK UP

Alector encourages all employees to raise concerns without threat of harassment, discrimination, or retaliation if they reasonably believe that an activity may violate laws or regulations, this Code, or company policies and procedures.

Report your concerns if you reasonably believe that a violation has occurred or is likely to occur. Your timely reporting will help Alector address these concerns. Alector values your engagement and feedback, and we are dedicated to ensuring that you're comfortable raising concerns without fear of retaliation. We value your voice in ensuring that Alector is upholding its legal and ethical obligations.

You have several options for reporting suspected unlawful or unethical behavior: your manager, the People Team, and the Legal Team. Further, you can also file anonymous reports. Reporting options include:

- Via the web at [whistleblowerservices.com/alector](https://whistleblowerservices.com/alector)
- Toll-free telephone call to (877) 865-4585, available 24 hours per day
- By anonymous email to [hotline@alector.com](mailto:hotline@alector.com)
- By email to the Board of Directors Audit Committee Chair at [auditchairperson@alector.com](mailto:auditchairperson@alector.com) or

- By regular mail to  
Attn: Chairperson, Audit Committee, Alector, Inc.  
131 Oyster Point Blvd., Suite 600  
South San Francisco, CA 94080

For further information about reporting a complaint, see the Alector [Policy on Reporting and Addressing Complaints](#).

## Anti-Retaliation: Zero Tolerance

Alector has a zero-tolerance policy for retaliation, harassment, or discrimination against employees who report good faith allegations of actual or suspected violations of this Code, company policies, laws, or regulations. Our policies, which are based on federal and state laws, protect reporters from any form of retaliation. Those who engage in retaliation will be subject to disciplinary action up to and including termination.

Employees may submit a report about any potential violation or concern, including:

- Actual or potential violations of the law, regulations, or any other government requirement or obligation
- Questionable accounting, internal accounting controls, or auditing matters, including fraudulent financial reporting or insider trading
- Actions that appear to violate our Code of Conduct or any company policy
- Employment-related discrimination, retaliation, or harassment of any type whatsoever







# How We Conduct Our Business

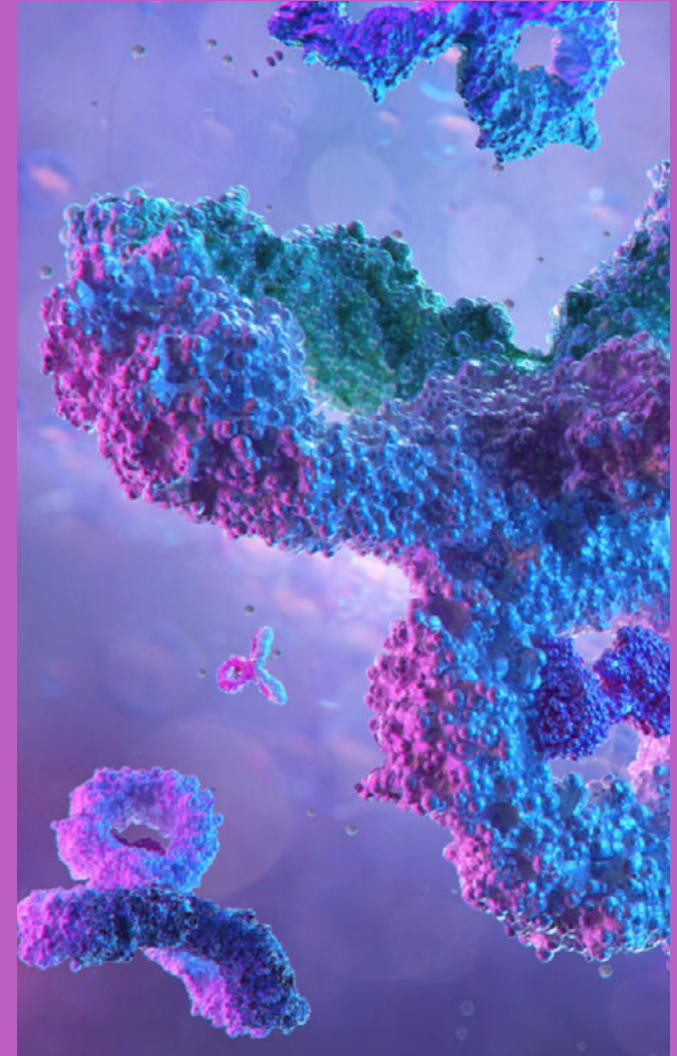
## Research, Development, and Manufacturing of Our Products

In everything we do, we seek to ensure integrity and quality in the development and manufacturing of our products, in compliance with relevant laws, regulations, standards, and our policies and procedures—for example, the Food, Drug and Cosmetic Act (FDCA), the European Union's General Data Protection Regulation (GDPR), US Health Insurance Portability and Accountability Act (HIPAA), federal and state False Claims Acts, and the Foreign Corrupt Practices Act (FCPA). Alector also follows industry standards of conduct like the Pharmaceutical Research and Manufacturers of America (PhRMA) Code, the World Medical Association (WMA) Declaration of Helsinki, the International Committee of Medical Journal Editors (ICMJE) recommendations, and the Accreditation Council for Continuing Medical Education (ACCME) requirements.

Patients are our first priority. We treat study participants with respect and dignity, and we are committed to protecting their privacy and safety by ensuring that they are informed of the safety risks involved when participating in our studies, consistent with Good Clinical Practices (GCP) and related industry standards.

We monitor the quality and safety of our clinical studies and we execute in compliance with the Current Good Practices (GxP) in manufacturing and clinical studies. Adhering to these standards helps us to develop and provide safe and effective therapies to patients who need them.

We understand the importance of transparency in advancing scientific knowledge and research. We describe information about our trials and post results when studies are completed on [ClinicalTrials.gov](https://ClinicalTrials.gov). We publish timely and accurate results of our clinical studies—whether positive or negative—in peer-reviewed scientific journals in a manner that is consistent with Good Publication Practice (GPP) and with the Policy on Scientific Publications.







## Interactions With Healthcare Professionals and Organizations

Physicians and other healthcare professionals (HCP) and healthcare organizations (HCO) rely on Alector to provide timely, accurate, and balanced information. Alector's communications to HCPs and HCOs must follow the relevant laws and regulations that require all product and disease awareness communications to be fair, balanced, accurate, and truthful. Disseminating or distributing false, misleading, unlawful, or "preapproval" or "off-label" product information is not permitted or endorsed by Alector.

We also ensure that our relationships with HCPs and HCOs are based on the principles of fair dealing. We do not engage in inappropriate undue influence of third parties. Accordingly, we take anti-kickback and anti-bribery laws very seriously. Employees may not, under any circumstances, offer, pay, or reimburse anything of value to anyone to influence, refer, use, prescribe, or study our products—especially when those products are paid for by a government entity. Specifically, Alector's payments or transfers of value with these entities must be fair market value and, among other things, based on a legitimate business need for the item or service.

For further guidance, please refer to Alector's [Healthcare Compliance Policies](#).

## Animal Welfare

We care about the treatment of animals in scientific research. In carrying out our studies, Alector abides by all applicable laws and regulations and aspires to the principle of the "3 Rs"—reduce, refine, and replace the use of animals in biomedical research.

## Reporting Concerns About Alector Products

Employees who are aware of a potential or actual side effect, or an adverse event related to any Alector product must report the information to the Pharmacovigilance team at [drugsafety@alvector.com](mailto:drugsafety@alvector.com) within 24 hours of the report.

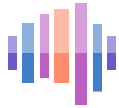
## Interactions with HCPs and HCOs: Questions and Answers

**Q: I want to discuss the latest results of our trials. May I?**

**A:** Consider where you will be sharing this information and with whom. Also, consider the requirements of the [Policy on Use of Social Media](#). Our Clinical and Medical Affairs teams may share this information during an abstract presentation or similar event as part of scientific exchange. Our Executive, Investor Relations, and Corporate Communications teams may share this information with investors. However, outside of these settings, we have restrictions imposed by the government. You should contact the Legal team to confirm that your discussion is appropriate.

**Q: I need my thesis advisor to help me with my project. He asked if I can pay him. May I?**

**A:** It depends. If Alector has a genuine need for his services, he may be retained as a consultant. We would need to determine if there is a legitimate purpose for the services, agree to a fair market valued-based payment amount, then draft a contract for his services. Again, you should contact the Legal team to confirm that this is appropriate.



## External Communications and Social Media

Alector's Investor Relations and Corporate Affairs groups are solely responsible for responding to questions from the media, investors, and in general, other non-HCP external organizations. If you receive a question from a member of the media or an investor, please do not answer on behalf of Alector and promptly refer them to Corporate Communications or Investor Relations. Refer all inquiries from physicians, patients, and caregivers to Medical Affairs.

Because Alector operates in a highly regulated environment, it is important to manage external communications about the company, especially on social media and other electronic platforms. Corporate Communications is solely responsible for managing Alector's presence on these platforms, e.g. Alector's website or Alector's LinkedIn account.

In general, you must not post original content about Alector, including reposting of third-party content, or speak on behalf of Alector on your personal social media platforms without Corporate Communications' authorization. "Liking" or reposting corporate content is permissible. You may also share Alector's employment opportunities, information about our culture, and involvement in charitable events such as "fun runs". Importantly, you are not permitted to post original content, or repost third party content, about Alector's clinical data or our products without Corporate Communications' prior authorization.

When posting about Alector, your posts must clarify that the opinions are your own and are not being made on behalf of the company.

Regardless of whether you are posting on a personal social media site or a professional social media site (e.g. LinkedIn), you must always comply with our anti-discrimination and anti-harassment policies. [Guidance on Anti-Discrimination and Anti-Harrassment](#). Moreover, social media communications that bully or disparage individuals or our competitors are absolutely prohibited.

Please refer to Alector's [Policy on Use of Social Media](#) for further guidance on posting on social media sites, including sites such as LinkedIn that reveal your affiliation with Alector.

### Social Media: Questions and Answers

**Q:** I noticed that our phase 2 data was released at the American Association of Neurology meeting this week. May I post the results on my LinkedIn page?

**A:** Employees may not post the results of Alector's clinical studies on their social media accounts unless specifically approved to do so by Corporate Communications, or as a direct repost (without changes or comment) from an official Alector account. Speak with your manager or Corporate Communications prior to posting.

**Q:** What if I know about a job opening posted on the Alector website? Can I share it with my contacts on Twitter?

**A:** Yes. You may create your own original post on Twitter (or any other platform) about Alector's career opportunities.



## Anti-Bribery and Anti-Corruption (ABAC)

Alector does not bribe or use illegal means of influencing others to complete our activities—such behavior is not aligned to our core values. Additionally, bribery is illegal in every country where we conduct business. For example, the United States Foreign Corrupt Practices Act (FCPA) prohibits offering or giving anything of value to a foreign government official to obtain or retain business, or to receive favorable government benefits. This includes expensive dinners, free travel, gifts, and other items that are not customary business gratuities. Offering a bribe to a government official or employee (including physicians, elected and appointed officials, or state hospital employees) in exchange for favorable treatment, contract awards, or other government benefits could result in criminal prosecution. Prohibitions on this type of behavior exist under the laws of other countries, too.

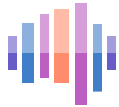
Accordingly, to avoid legal liability for themselves and for Alector, under our [Global Anti-Corruption Policy](#), employees must not engage in such activities. When interacting with third parties, including government officials, in the United States and abroad, be sure that you understand how to assess and avoid these types of problematic interactions. We encourage you to speak up if you have any questions or concerns. For more details, please review the policy and reach out to the Legal team.



## Anti-Bribery and Anti-Corruption: Questions and Answers

- Q:** I'm working with a government-owned hospital overseas where the physicians are considered government employees. The lead physician at the hospital conducting our phase 3 study asked if Alector would pay for a trip to San Francisco for her and her husband, and she would make sure that our trial gets top priority for patient enrollment. I don't have a business need for them to visit. Can Alector pay for their trip?
- A:** No, this would be an inappropriate payment. The physician's request looks like a "quid pro quo." She's likely asking for the trip in exchange for prioritizing Alector's patient recruitment efforts. Her request should be denied because if not actual inappropriate influencing, at the very least it raises the appearance of impropriety, and could be considered an improper payment.





## Free and Fair Competition

Competition and antitrust laws guard against unfair business practices that disadvantage patients and consumers. Our commitment to fairness includes respecting the rights of our competitors to participate lawfully in the marketplace and abiding by all applicable antitrust and competition laws.

## Privacy and Data Protection

As part of our research and related business activities, we collect personal information from patients, employees, business partners, and healthcare professionals. Our privacy and data protection standards are grounded on the principle of minimizing the amount of personal data that we collect to only what is necessary, limiting access to data to only those employees who require it (ie, only those who need access to data), and retaining the data for the minimum amount of time necessary.

For more information, please refer to Alector's [Privacy Policies](#).

## Political Engagement

Political activities like lobbying, candidate campaigns, ballot initiatives, and grassroots advocacy efforts are regulated by federal, state, and local laws. Generally, employees may not use Alector resources (such as computers, office space, meeting rooms, food or beverages) or spend working hours on political activities. Such activities must be voluntary and on an employee's own time, and it must be clear that the employee is acting independently—not as an Alector representative.





# How We Protect Against Conflicts of Interest

## What are “conflicts of interest” and how can we avoid them?

Each of us has personal, family, and financial relationships outside of Alector that we care about. When a personal or financial interest clashes with your responsibilities to Alector, it may give rise to “divided loyalties” or a conflict of interest. We want to avoid both actual conflicts and the appearance of a conflict to protect the integrity and transparency of our business interactions. Decisions and actions should be based on the best interests of the company, rather than your personal gain. For more information about conflicts of interest and how to manage them, please consult the [Related Person Transactions Policy](#) and the [Alector Employee Handbook](#).

There are many circumstances that may give rise to a conflict—for example, hiring family members as employees, vendors, or suppliers; holding a position on a board of directors of a company that competes with Alector; or receiving gifts and benefits from vendors or others who seek business with Alector.

A personal conflict of interest happens, for example, when your brother applies for a position at Alector in your department. While it is appropriate for you to forward his resume to the hiring manager, you may not hire him as your direct report and you may not be part of the interview panel or participate in the hiring decision. Alector prohibits family members (by birth or marriage) or “related persons” to work under the same line of authority, unless approved by the People team.

When you're confronted with a situation that could result in a conflict of interest or the appearance of a conflict, you must disclose it to your manager who will discuss the matter with the Legal team. If your manager is involved in the potential or actual conflict, discuss the issue directly with the Legal Team.

After discussions with Legal, your manager's or potentially, the next-level manager's approval is required prior to accepting the item or taking further action. For instance, if an Alector employee wants to sit on the board of directors of a competing company, or on a nonprofit board of a patient organization that seeks Alector financial support, the employee must disclose the potential relationship to his or her manager, and receive approval from the manager, prior to entering into the relationship.

Managers are entrusted with understanding how to avoid conflicts of interest, so they must consult with the Legal team and provide a description of any potential conflict prior to approving an employee's acceptance of any item or service.

Alector's officers and directors must fully disclose the circumstances of any actual or foreseeable conflict of interest to the Chief Executive Officer, President, or Chief Financial Officer, as well as the Chief Compliance Officer or the Audit Committee Chair. Officers and directors of Alector may engage in an activity that may be an actual or foreseeable conflict of interest if approval is obtained from the CEO or President, in consultation with the Legal team. Officers and directors of Alector with a potential conflict of interest may also seek authorization from the Audit Committee, or if it is not practicable to wait until the next Audit Committee meeting, then the General Counsel will inform the Audit Committee Chair, who may authorize the activity, provided that the Chair reports this authorization to the Audit Committee at its next meeting. Alector may decide to rescind a prior approval to avoid a conflict of interest, or the appearance of one, if the individual who initially approved (CEO, President, or Audit Committee Chair) finds that this action is in the company's best interest.

**If you have any questions or need help, reach out to your manager, the People team, or the Legal team.**



**Conflicts of interests may be difficult to identify, so ask yourself these questions in case of a potential conflict:**

- Will the activity or item interfere with my performance or the performance of other employees?
- Will the activity require a time commitment that interferes with my performance?
- Will the activity or item influence my decision-making at Alector?
- Does the activity provide a personal benefit to me or my family because of my employment at Alector? In other words, if I weren't employed at Alector, would I receive the benefit?
- Will my participation or receipt of the gift or gratuity put my personal or another person's (for example, service providers, customers, suppliers) interests ahead of the company's?
- Would my acceptance of the benefit, if publicly disclosed, damage the reputation of Alector and/or enhance a competitor's?
- Would others view the action or the acceptance of the gift as inappropriate or improper?







## Vendor Gifts, Entertainment, Tickets, and Other Benefits

Vendors may offer you gifts, entertainment, or similar benefits as a business gratuity. Generally, items of modest value that are reasonable, customary, and would not improperly influence your business judgment are acceptable. Lavish, expensive gifts from vendors like 5-star restaurant meals, free travel, sporting event tickets, or gifts of cash can result in an actual or perceived conflict of interest.

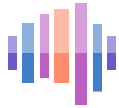
It is never appropriate to solicit benefits from vendors or consultants, regardless of the type or value of the item(s). Importantly, employees are strictly prohibited from accepting anything of value as a “quid pro quo” (for example, a bribe or “payoff”) in exchange for contracts or promises of future work from Alector.

In some business situations outside of the United States, it is customary and lawful for executives to present gifts to their business partners. These gifts may exceed a nominal value, and under some circumstances, returning the gifts or paying for them may be insulting to the giver. If you have questions about business customs outside of the United States, contact the Legal team.

## Outside Employment and Participation on Corporate and Nonprofit Boards

Full-time Alector employees may not “moonlight” as an employee, consultant, or contractor for a competitor, customer, supplier, or any other entities that have a business relationship with Alector, unless the employee receives approval from the People team (in consultation with the Legal team) and his or her manager.

Employees who wish to serve on the board of directors of a corporation, nonprofit organization, or Scientific Advisory Board must disclose the opportunity with their manager and receive approval from the People team. Alector's executive officers who wish to serve on a board must follow the process described in this Code for disclosing potential conflicts of interest, [see Guidance on Conflicts of Interest](#), in accordance with our Corporate Governance Guidelines. If you sit on a board, you must recuse yourself from board matters that may pose a conflict on interest, or an appearance of a conflict with Alector's business.



## Avoiding Conflicting Financial Interests in Other Companies

Other types of conflicts of interest arise when an Alector employee (or a spouse or close relative) holds a major financial stake, investment, or interest (stock or ownership, for example) in a competitor, supplier, distributor, customer, or strategic partner of Alector. If you, your spouse, or a close relative has a significant financial interest in an entity that is involved in a transaction with Alector, you must provide prior notice to the People team and your manager. They will determine, in consultation with Legal, whether you must recuse yourself from further involvement in the transaction or whether you may play a different role related to the transaction.

## Corporate Opportunities

Alector requires our employees to avoid using their employment—either directly or indirectly—for improper personal gain or to compete with Alector. This includes, for example, avoiding disclosure of confidential or sensitive information or trade secrets to competitors, investors, or the public. If you have questions, contact the Legal team.

## Loans by Alector

Alector does not provide loans to members of its board of directors or executive officers. Loans to other corporate officers and employees must be approved in advance by the Board of Directors or its designated committee.

## Election or Appointment to Public Office

You may serve in an elected or appointed public office provided that the position does not create or appear to create a conflict of interest. Prior to seeking office or receiving notice of the public office, please notify your manager and discuss the time commitment and scope of your anticipated position.





## Tip: Where to Go With Questions

It's your responsibility to disclose potential conflicts of interest before they occur, and to obtain approval in some cases. Talk with your manager or the People or Legal team if you have questions or need approval.

### Conflicts of Interest: Questions and Answers

**Q: My sister owns a catering company and she's offering Alector a deep discount. Can we hire her company to serve lunches at Alector?**

**A:** Your sister's company must go through the same vendor review process as any other lunch catering vendor. You may introduce her to Alector's catering decision-makers, but if you're the decision-maker or part of a group that makes the decision, you're required to recuse yourself and contact your manager. Your manager should consult with the Legal team to determine the appropriate decision-maker for the catering services, and that individual will determine whether to use your sister's company.

**Q: Is it ok to buy stock in companies that compete with Alector?**

**A:** Generally, yes. You may purchase stock in companies that have products in the same therapeutic area if the stock purchase is done without any "insider" or non-public information. (Please see Section V and the [Insider Trading Policy](#) for further guidance.)

**Q: I received an Edible Arrangements® bouquet from a vendor. May I accept it?**

**A:** It depends. If you and your manager believe that accepting this gift will not influence your relationship with the vendor, you may accept it if the Edible Arrangements® bouquet is of minimal value and if given in a reasonable and customary business setting (eg, as a holiday gift to your team). We encourage you to consider sharing such gifts with others within Alector.

**Q: A company that is interested in Alector's business would like to fly me and my spouse to the Bahamas for a "capabilities presentation." May I accept it?**

**A:** It may be permissible for you to attend the presentation (subject to approval by your manager), but the vendor's offer to include your spouse on the trip suggests an improper motive that, at the very least, is a perceived personal conflict of interest that you must avoid.





Table of Contents

Overview of Alector's Code of Conduct

How We Conduct Our Business

How We Protect Against Conflicts of Interest

How We Respect Each Other

How We Operate with Financial Integrity







# How We Respect Each Other

## Diversity, Equity, and Inclusion

At Alector, we believe that high-performing teams include people from a wide variety of backgrounds and experiences who can provide feedback by challenging each other's assumptions with fresh perspectives and bringing creative ideas to the table. This perspective embodies our core values of embracing feedback and questioning convention. We're committed to building an open, diverse, and inclusive environment for all employees, and we enthusiastically accept our responsibility to make employment decisions without regard to race, religion, creed, color, age, sex, sexual orientation, gender identity, gender expression, national origin, ancestry, marital status, genetic characteristics, cancer diagnosis or history, disability, military service or veteran status, pregnancy, childbirth and related medical conditions, genetic information, or any other classification protected by applicable federal, state, or local laws and ordinances.

Our managers are dedicated to this commitment in hiring, placement, promotion, transfer, demotion, layoff, termination, recruitment advertising, pay, and other forms of compensation, training, and general treatment during employment. Alector's managers are expected to treat their teams with dignity, fairness, respect, and full compliance with the law and our policies.

We will comply with the laws protecting qualified individuals with disabilities, as well as employees' religious beliefs and observances. We will provide a reasonable accommodation for any known physical or mental disability of a qualified individual and/or an employee's religious beliefs and observances to the extent required by law.





## Anti-Discrimination, Anti-Harassment

Alector does not tolerate discrimination or harassment of or retaliation against our employees, job applicants, contractors, consultants, interns, or volunteers for any reason—whether based on race, religion, color, age, sex, sexual orientation, gender, national origin, ancestry, marital status, disability, military service, veteran status, or pregnancy, among other things. The company is committed to a workplace free of discrimination, harassment, and retaliation. For more information, please consult the [Anti-Harassment Policy](#).

Bullying and retaliation are strictly prohibited. If you or someone else has been bullied or discriminated or retaliated against, you should promptly inform your supervisor and/or the People team. If you don't feel comfortable reporting this to either of them, you should inform the next-level manager and/or the Legal team. You may also report your concern anonymously through Alector's Hotline. Please see [page 8](#) of this Code for the Hotline contact information.

## Healthy and Safe Workplace

As a company dedicated to improving the life and health of patients, Alector is equally committed to ensuring that our workplaces are safe and healthy for our employees. Each of us is responsible for following safety and health regulations and promptly reporting accidents, injuries, or unsafe equipment, practices, or conditions, whether in the laboratory, at manufacturing sites, or in the office.

We also seek to limit environmental risks through safe technologies and operating procedures, and to be prepared to respond appropriately to accidents and emergencies.

We encourage employees to report hazardous or dangerous conditions to a manager or the People team.

### What is retaliation?

"Retaliation" includes any action taken against an individual because they reported a violation, opposed activities that are violative or illegal, or participated in an investigation. It may include shunning or avoiding the person who filed the report, or harassment, discrimination, or threatening or intimidating behavior that is intended to thwart the reporter's efforts. It may also include denying promotions, career advancement, or other employment benefits because of the individual's report.

Employees who feel they have been retaliated against should contact their manager or, the People or Legal team.







## Environmental, Social, and Governance

Consistent with the core values of Alector, we consider how our activities impact not only patients, but our community as a whole. We are stewards of the environment by ensuring that we conserve and utilize resources consistent with the applicable laws and regulations. Further, we strive to minimize and, if possible, eliminate the use of substances that cause environmental damage.

We initiate and implement initiatives to reduce resource consumption, waste generation, and environmental pollution and to address global warming and climate change. We strive to use environmentally friendly materials in our business, and we encourage all employees to participate actively in our onsite compost and recycling program.

## Human Rights

We stand against any form of forced labor, human trafficking, or illegal or abusive treatment of employees, vendors, or other third parties who work on behalf of Alector.





# How We Operate with Financial Integrity

Alector is a publicly traded company that is subject to laws and regulations that require transparent and accurate financial reporting to government authorities, our shareholders, and the public. Our procurement, accounting, and financial controls are designed to protect Alector and to promote respect among regulators, investors, financial institutions, our partners, and the public. We take these responsibilities seriously.

## The 3 key principles that preserve our financial integrity include:

- Compliance with US federal and state laws, and the applicable laws of other countries
- Transparency and timeliness in financial reporting
- Accuracy and honesty





## Use of Company Assets, Accurate Corporate Reporting, and Record Keeping

Alector provides computers and other assets for employees' use, including equipment, supplies, intellectual property (such as patents, copyrights, trademarks, inventions, technology, and trade secrets), and other proprietary or nonpublic information. In using company assets, you must:

- Use reasonable efforts to safeguard against loss, damage, misuse, or theft
- Use company property for appropriate uses consistent with Alector's business interests
- Not transfer, loan, sell, or donate Alector property without appropriate authorization
- Not use company assets in a manner that would result in or facilitate the violation of law
- Follow Alector policies regarding contracting, expense reimbursement and reporting, and record keeping and document retention policies

It is important to understand that Alector has the right to monitor and review company assets that are in your possession. You must return all company property at the conclusion of your employment at Alector. Importantly, your obligation not to disclose confidential or proprietary information continues after your employment ends.

## Insider Trading

Insider trading is unlawful. You can be prosecuted by the US Securities and Exchange Commission (SEC) if you engage in insider trading. Employees must follow Alector's [Insider Trading Policy](#), which prohibits directly or indirectly (for example, through family or friends) buying or selling Alector securities based on material nonpublic information obtained from your work at Alector. "Tipping off" others by providing them with material, nonpublic information is also unlawful.

If you have any questions about insider trading rules, please contact the Legal or Finance team for guidance.

## Trade Secrets, Intellectual Property, Confidential Information

As an Alector employee, you may possess confidential or proprietary information that has not been made available to the public. Each of us is responsible for safeguarding Alector's trade secrets, intellectual property, and confidential information against premature disclosure. This includes online disclosures in discussion groups, chat rooms, bulletin boards, or electronic or social media.







### Examples of confidential business information include:

- Clinical research plans and priorities
- Plans for partnerships, collaborations, acquisitions, or other business transactions
- Proprietary and technical information, such as preclinical and clinical data, trade secrets patents, inventions, product plans, and customer lists
- Business plans, such as sales projections, revenue, and expenses, or
- Manufacturing plans or processes





## Who to Contact...

If you suspect or have concerns about potential violations of this Code, please follow the guidance outlined on [page 8](#) of this Code or report a complaint per the [Policy on Reporting and Addressing Complaints](#)

If you are seeking information, clarification or have questions about the information in this Code, please contact your manager, the Legal team or [compliancehelp@alector.com](mailto:compliancehelp@alector.com).



