

## Y-mAbs Therapeutics, Inc. Insider Trading Compliance Policy

### I. PURPOSE

Y-mAbs Therapeutics, Inc. (“Y-mAbs” or the “Company”) has adopted this Insider Trading Compliance Policy (the “**Policy**”) to comply with insider trading laws and to prevent even the appearance of improper insider trading. Additionally, this Policy prohibits the unauthorized disclosure and misuse of any material, non-public information.

### II. SCOPE

- A. Persons Covered by This Policy.** This Policy applies to all directors, officers, employees, consultants and independent contractors of Y-mAbs. References to Y-mAbs include subsidiaries of Y-mAbs. References in this Policy to “you” (as well as general references to directors, officers, employees, consultants and independent contractors of Y-mAbs) should also be understood to include members of your immediate family, persons with whom you share a household, persons who are your economic dependents and any other individuals or entities whose transactions in securities you influence, direct or control.
- B. Types of Transactions Covered by This Policy.** Except as explicitly set forth in “Limited Exceptions” below, this Policy applies to any and all transactions involving the securities of Y-mAbs, including transactions in common stock, preferred stock, options, warrants, restricted stock units, performance-based restricted stock units, debt securities, transactions in derivative securities such as exchange-traded put or call options, hedging transactions, short sales and certain decisions with respect to participation in employee benefit plans. Except as explicitly set forth in Section 6 of XI: Requirements to Adopt 10b5-1 Trading Plans, there are no exceptions from insider trading laws or this Policy based on the size of the transaction or personal circumstances.
- C. Applicability of This Policy after Your Departure.** You are expected to comply with this Policy, even after your departure from Y-mAbs, until such time as you are notified by Y-mAbs that you are no longer subject to this Policy.

### III. SPECIFIC GUIDANCE

#### A. Generally Prohibited Activities

- 1. Trading on Material Non-Public Information.** Except as discussed in “Limited Exceptions” below:

- a. you may not buy, sell or otherwise trade in Y-mAbs's securities while aware of material non-public information relating to Y-mAbs. It does not matter that you did not "use" the information in your transaction.
  - b. You may not buy, sell or otherwise trade in Y-mAbs's securities during any trading blackout period applicable to you as designated by a Compliance Officer (as defined below).
2. **Tipping.** Providing material nonpublic information to another person who may trade or advise others to trade on the basis of that information is known as "tipping" and is illegal. Therefore, you may not "tip" or provide material nonpublic information concerning the Company to any person other than a director, officer or employee of the Company, unless required as part of your regular duties for the Company and authorized by a Compliance Officer.
3. **Engaging in Short Sales.** This Policy prohibits short sales (i.e., the sale of a security that the seller does not own at the time of the trade or must be borrowed to make delivery) and "selling short against the box" (i.e., a sale with a delayed delivery) with respect to Y-mAbs securities.
4. **Derivative Securities and Hedging Transactions.** This Policy prohibits transactions in publicly-traded options, such as puts and calls, and other derivative securities with respect to Y-mAbs's securities. This prohibition extends to any hedging or similar transaction designed to decrease the risks associated with holding Y-mAbs securities.
5. **Pledging Company Securities as Collateral for Loans.** This Policy prohibits the pledging of Y-mAbs securities as collateral for loans.
6. **Holding Company Securities in Margin Accounts.** This Policy prohibits holding Y-mAbs securities in margin accounts.
7. **Frequent Trades of Company Securities.** Y-mAbs strongly discourages you from actively trading in the Company's securities. You should expect to hold any shares of the Company securities that you acquire for at least six months before you sell them, unless the securities are subject to forced sale (for example, as a consequence of a merger or acquisition).
8. **Placing Open Orders with Brokers.** Except in accordance with an approved trading plan (as discussed below), those individuals who are not required to transact in securities pursuant to an approved trading plan should exercise caution when placing open orders, such as limit orders or stop orders, with brokers, particularly where the order is likely to remain outstanding for an extended period of time. Open orders may result in the execution of a trade at a time when you are aware of material non-public information or otherwise are not permitted to trade in Y-mAbs securities. If you are subject to blackout

periods or pre-clearance requirements, you are required to inform your broker of your obligations under this Policy when you place any open order at the time the order is placed. Individuals subject to pre-clearance requirements may not maintain open orders beyond the period for which pre-clearance has been obtained, except pursuant to a 10b5-1 plan.

- 9. Trading in Securities of Other Companies.** You may not engage in transactions involving the securities of any other company (e.g. Y-mAbs's customers, vendors, partners, collaborators, suppliers and competitors) if you are aware of material non-public information about that company gained in the course of employment with Y-mAbs. Prohibited activities include: (i) trading in the securities of the other public company, or (b) tipping or disclosing such material nonpublic information concerning the other public company to anyone. Trades conducted through mutual funds or other trades over which you do not exert investment or voting control of securities are permissible.

#### **IV. DEFINITION OF INSIDERS AND ADDITIONAL RESTRICTIONS**

- A. Section 16 Individuals.** The members of the board of directors and individuals identified as executive officers or Section 16 officers by a Compliance Officer are defined as "Section 16 Individuals." Section 16 Individuals are subject to Section IX - Trading Blackout Periods and Section X - Pre-Clearance of Trades. Section 16 Individuals are required to adopt a Rule 10b5-1 Plan to trade Y-mAbs securities pursuant to Section XI – Requirements to Adopt 10b5-1 Trading Plans.
- B. Key Employees.** Y-mAbs's employees with the designation of Vice President and above and employees identified as a key employee by a member of the executive leadership team are defined as "Key Employees" and are subject to Section IX - Trading Blackout Periods and Section X - Pre-Clearance of Trades.
- C. Finance Insiders.** Y-mAbs's employees in the finance department with access to material nonpublic information as identified by the Chief Accounting Officer or the Chief Financial Officer are defined as "Finance Insiders" and are subject to Section IX - Trading Blackout Periods and Section X - Pre-Clearance of Trades. The Chief Accounting Officer or the Chief Financial Officer will evaluate annually whether employees in the finance department have access to material nonpublic information. Additionally, when a new employee joins the finance department, the Chief Accounting Officer or the Chief Financial Officer will evaluate whether that employee will have access to material nonpublic information such that the employee is subject to Section IX - Trading Blackout Periods and Section X - Pre-Clearance of Trades.
- D. Other Insiders.** Y-mAbs's employees in the various departments with access to material nonpublic information as identified by a Compliance Officer are defined as "Other Insiders" and are subject to Section IX - Trading Blackout Periods. The Compliance Officer will evaluate annually whether employees have access to material nonpublic information. Additionally, when a new employee joins any department but the finance department, the Compliance Officer will evaluate whether that employee will have access to material nonpublic information such that the employee is subject to Section IX - Trading Blackout Periods.

## V. LIMITED EXCEPTIONS

The following are certain limited exceptions to the restrictions imposed by Y-mAbs under this Policy. Please be aware that even if a transaction is subject to an exception to this Policy, you will need to separately assess whether the transaction complies with applicable law. For example, even if a transaction is indicated as exempt from this Policy, Section 16 Individuals may need to comply with the “short-swing” trading restrictions under Section 16, if applicable. You are responsible for complying with applicable law at all times.

- A. Transactions Pursuant to a Trading Plan that Complies with SEC Rules.** The trading restrictions under this Policy do not apply to purchases and sales made pursuant to a written plan under Rule 10b5-1 under the Exchange Act (a “10b5-1 Plan”) that is adopted and operated in compliance with the terms of this Policy set forth in Section XI below.
- B. Receipt and Vesting of Stock Options, Restricted Stock Units, Performance-Based Restricted Stock Units, Restricted Stock and Stock Appreciation Rights.** The trading restrictions under this Policy do not apply to the grant or award of stock options, restricted stock units, performance-based restricted stock units, restricted stock or stock appreciation rights issued or offered by Y-mAbs. The trading restrictions under this Policy also do not apply to the vesting, settlement, cancellation or forfeiture of stock options, restricted stock units, performance-based restricted stock units, restricted stock or stock appreciation rights in accordance with applicable plans and agreements, or to shares that are automatically sold to satisfy tax withholding obligations in a non-discretionary transaction. The trading restrictions do apply, however, to any subsequent discretionary sales of any such securities or the common stock underlying such securities. The trading restrictions also apply to discretionary sales made to cover taxes upon option exercise or any other volitional transaction.
- C. Exercise of Stock Options for Cash.** The trading restrictions under this Policy do not apply to the exercise of stock options for cash under Y-mAbs’s stock option plans. Likewise, the trading restrictions under this Policy do not apply to the exercise of stock options in a stock-for-stock exercise with Y-mAbs or an election to have Y-mAbs withhold securities to cover tax obligations in connection with an option exercise or vesting of restricted stock units or performance-based restricted stock units. However, the trading restrictions under this Policy do apply to (i) the sale of any securities issued upon the exercise of a stock option, (ii) a cashless exercise of a stock option through a broker, because this involves selling a portion of the underlying shares to cover the costs of exercise, (iii) any other market sale for the purpose of generating the cash needed to pay the exercise price of an option; and (iv) the discretionary sale of any securities to cover tax withholding obligations. You shall notify a Compliance Officer upon your exercise of stock options for cash under Y-mAbs’s stock option plans.
- D. Purchases under the Employee Stock Purchase Plan.** The trading restrictions in this Policy do not apply to elections with respect to participation in Y-mAbs’s employee stock purchase plan or to purchases of securities under the plan. However, the trading restrictions do apply to any subsequent sales of any such securities acquired therefrom.
- E. Stock Splits, Stock Dividends and Similar Transactions.** The trading restrictions under this Policy do

not apply to a change in the number of securities held as a result of a stock split or stock dividend applying equally to all securities of a class, or similar transactions.

- F. Bona Fide Gifts and Inheritance.** The trading restrictions under this Policy apply to bona fide gifts involving Y-mAbs securities or transfers by will or the laws of descent and distribution made by any individual subject to this Policy's pre-clearance requirements. The Policy's trading restrictions do not apply to bona fide gifts involving Y-mAbs securities or transfers by will or the laws of descent and distribution made by individuals not subject to pre-clearance requirements. However, the trading restrictions under this Policy apply to the sale of any gifted or inherited securities made by any Y-mAbs employee if the recipient, for example, an immediate family member, is subject to this Policy. See "Scope" above. In other words, you cannot use a gift to conduct a transaction that otherwise would be prohibited under this Policy. Please also note that under Y-mAbs's stock option plans, a stock option or other equity award may not be gifted or transferred except under very limited circumstances.
- G. Change in Form of Ownership.** Transactions that involve merely a change in the form in which you own securities are not subject to the trading restrictions under this Policy. For example, you may transfer shares to an inter vivos trust of which you are the sole beneficiary during your lifetime.
- H. Other Exceptions.** Any other exception from this Policy must be approved by an independent committee of the Board of Directors.

## **VI. POTENTIAL PENALTIES AND DISCIPLINARY ACTIONS**

- A. Civil and Criminal Penalties for Insider Trading.** The consequences of prohibited insider trading or tipping can be severe. Persons violating insider trading or tipping rules may be required to disgorge the profit made or the loss avoided by the trading, pay the loss suffered by the person who purchased securities from or sold securities to the insider or tippee, pay significant civil and/or criminal penalties, and serve a lengthy jail term. In such circumstances, Y-mAbs may also be required to pay major civil or criminal penalties.
- B. Disciplinary Actions.** Violations of this Policy may result in disciplinary action, up to and including dismissal for cause. In addition, Y-mAbs may give stop transfer and other instructions to Y-mAbs's transfer agent or equity plan administrator to enforce compliance with this Policy.

## **VII. COMPLIANCE OFFICER**

The Company has designated the Company's General Counsel, currently Sune Reinholdt Nyland, as the individual responsible for ensuring compliance with this Policy (the "**Compliance Officer**"). The duties of a Compliance Officer include the following:

- A.** Administering this Policy and monitoring and enforcing compliance with all Policy provisions and

procedures.

- B. Reviewing and either approving or denying all proposed trades by Section 16 Individuals and Key Employees in accordance with the procedures set forth in Section X.
- C. Designating and announcing special trading blackout periods during which you may not trade in Y-mAbs's securities.
- D. Providing copies of this Policy and other appropriate materials to all new Section 16 Individuals, Key Employees, Finance Insiders and Other Insiders.
- E. Administering, monitoring and enforcing compliance with all federal and state insider trading laws and regulations.
- F. Assisting in the preparation and filing of all required reports to the Securities and Exchange Commission (the "SEC") relating to insider trading in Y-mAbs's securities.
- G. Revising the Policy as necessary to reflect changes in federal or state insider trading laws and regulations, or revising the Policy to impose additional restrictions or requirements as otherwise deemed necessary or appropriate.

## VIII. DETERMINING WHETHER INFORMATION IS MATERIAL AND NON-PUBLIC

### A. "Material" Information

Information is material if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy, hold or sell securities or would view the information as significantly altering the total mix of information in the marketplace. There is no bright-line test for determining whether particular information is material and such determination depends on the facts and circumstances unique to each situation. In general, any information that could reasonably be expected to affect the market price of a company's stock is likely to be material. Both positive and negative information may be material.

It is not possible to define all categories of "material" information. However, some examples of information that could be regarded as material include information with respect to:

- Financial results, financial condition, earnings pre-announcements, guidance, projections or forecasts or significant changes in liquidity;
- Major contracts, orders, suppliers, customers, or finance sources or the loss thereof or product introductions or product defects;
- Significant developments in research and development or relating to intellectual property;
- Significant legal or regulatory developments;

- Major events involving Y-mAbs’s securities, including calls of securities for redemption, adoption of stock repurchase programs, option repricings, stock splits, or changes in dividend policies;
- Potential significant mergers and acquisitions, or sale of significant business or asset;
- Major personnel changes, such as changes in senior management or lay-offs and restructuring events; and
- Cybersecurity incidents.

If you have any questions as to whether information should be considered “material,” you should consult with a Compliance Officer. In general, it is advisable to resolve any close questions as to the materiality of any information by assuming that the information is material.

## B. “Non-Public” Information

Information is considered non-public until it has been broadly disseminated to the public through a widely circulated news or wire service (such as PR Newswire, MarketWired, Bloomberg, Dow Jones, etc.), through a pre-announced public webcast, or through a public filing with the SEC. For the purposes of this Policy, information will be considered non-public until at least one **full trading day** has elapsed following the Company’s widespread public release of the information. Any questions as to whether information is non-public should be directed to a Compliance Officer.

The term “**trading day**” means a day on which national stock exchanges are open for trading. A “**full**” trading day has elapsed when, after the public disclosure, trading in the relevant security has opened and then closed.

## IX. TRADING BLACKOUT PERIODS

- A. Trading Only When Trading Window is Open.** To limit the likelihood of trading at times when there is a significant risk of insider trading exposure, Y-mAbs has instituted quarterly trading blackout periods and may institute special trading blackout periods from time to time.
- B. No Trading While Aware of Material Non-Public Information.** It is important to note that whether or not you are subject to blackout periods, you remain subject to the prohibitions on trading on the basis of material non-public information and any other applicable restrictions in this Policy.
- C. Quarterly Blackout Periods.** Except as discussed in “Limited Exceptions,” Section 16 Individuals, Key Employees, Finance Insiders and Other Insiders must not conduct transactions involving Y-mAbs’s securities during quarterly blackout periods. From time to time, Y-mAbs may identify other persons who should be subject to Quarterly Blackout Periods, and a Compliance Officer may update and revise the definition of Key Employees. Even when a Quarterly Blackout Period is not in effect, an individual may be subject to other trading restrictions under this Policy.
- D. Duration of Quarterly Blackout Periods.** The “Quarterly Blackout Period” starts at the end of the last day of the second month of each fiscal quarter and ends at the beginning of the second full trading day following the date of public disclosure of the financial results for that fiscal quarter.

- E. Notification of the End of Quarterly Blackout Period.** Y-mAbs will notify you when each Quarterly Blackout Period starts and ends so that you will know when you may and may not engage in any transaction involving Y-mAbs's securities. You are responsible for complying with the blackout period described in this Policy regardless of whether you receive notification from Y-mAbs about the period.
- F. Special Blackout Periods.** From time to time, Y-mAbs may also prohibit you from engaging in transactions involving Y-mAbs's securities when, in the judgment of a Compliance Officer, a trading blackout is warranted. Y-mAbs will generally impose special blackout periods when there are material developments known to Y-mAbs that have not yet been disclosed to the public. Special blackout periods may be declared for any reason at the discretion of a Compliance Officer.
- G. 8-K Gap Periods.** Section 16 Individuals, Key Employees, Finance Insiders and Other Insiders may not trade during the period between an event that triggers an 8-K filing and the filing of the 8-K.

**Y-MABS WILL NOTIFY YOU IF YOU ARE SUBJECT TO A SPECIAL BLACKOUT PERIOD, IN WHICH CASE YOU MAY NOT ENGAGE IN ANY TRANSACTION INVOLVING Y-MABS'S SECURITIES UNTIL INSTRUCTED THAT IT IS PERMISSIBLE, AND YOU SHOULD NOT DISCLOSE THE EXISTENCE OF THE SPECIAL BLACKOUT PERIOD TO OTHERS.**

#### **X. PRE-CLEARANCE OF TRADES**

Except as discussed in "**Limited Exceptions**," Key Employees and Finance Insiders who are not required to transact in securities pursuant to an approved trading plan should refrain from engaging in any transaction involving Y-mAbs's securities without first obtaining pre-clearance of the transaction from a Compliance Officer.

- A. Pre-Clearance Procedures for Section 16 Individuals, Key Employees and Finance Insiders.** Section 16 Individuals, Key Employees and Finance Insiders may obtain pre-clearance of a transaction from a Compliance Officer by:
  - 1. Notifying a Compliance Officer in writing at least two-to-three business days prior to the proposed trade and receiving pre-approval for such trade during the Open Window Period. The request for pre-clearance should indicate the amount and nature of the proposed trade;
  - 2. Certifying to a Compliance Officer in writing at least one business day prior to the proposed trade that you are not aware of material nonpublic information concerning Y-mAbs and that should you receive pre-approval to trade you will complete the transaction within five trading days; and
  - 3. If a Compliance Officer desires to complete any trades involving Y-mAbs's securities, he or she must first obtain approval of the Chief Executive Officer and another Compliance Officer in accordance with the pre-clearance procedure described above.
- B. Trades Must be Completed Within Five Trading Days After Pre-Clearance.** After the receipt of pre-clearance approval, the requested trade(s) must be completed within five trading days of the



approval. Once the approval period has expired, a new notice and certification must be requested to trade in Y-mAbs's securities.

- C. No Obligation to Approve Trades.** A Compliance Officer is under no obligation to approve a transaction submitted for pre-clearance, and may determine not to permit the transaction at his or her discretion.

## **XI. REQUIREMENTS TO ADOPT 10B5-1 TRADING PLANS**

Individuals holding those positions listed in Exhibit A to this Policy are required to enter into a Rule 10b5-1 "trading plan" to trade Y-mAbs securities and may not trade Y-mAbs securities outside the trading plan except as otherwise provided in this Policy.

A Rule 10b5-1 trading plan involving purchases or sales of Y-mAbs securities must comply with the requirements of Rule 10b5-1 and must meet the following requirements:

1. The trading plan must be in writing and signed by the person adopting the trading plan and acknowledged by a Compliance Officer.
2. The trading plan must be adopted at a time when:
  - the person adopting the trading plan is not aware of any material non-public information;
  - the person adopting the trading plan is acting in good faith and not as part of a plan or scheme to evade the prohibitions of Rule 10b5-1; and
  - there is no quarterly, special or other trading blackout in effect with respect to the person adopting the trading plan.
3. The person adopting the plan must certify at the time of adoption that they are not aware of material non-public information regarding the company or its securities and that they are adopting the plan in good faith.
4. The individual adopting the trading plan may not have entered into or altered a corresponding or hedging transaction or position with respect to the securities subject to the trading plan and must agree not to enter into any such transaction while the trading plan is in effect.
5. The first trade under the trading plan may not occur until 90 calendar days following the adoption of the trading plan.
6. The trading plan must have a minimum term of nine months and may have a maximum term of two years (each starting from the time of adoption of the trading plan).
7. This Policy prohibits plan participants from engaging in trades of Y-mAbs's securities outside the terms of the plan during the plan period, unless you can demonstrate financial hardship to the satisfaction of a Compliance Officer.
8. Modifications Under the Plan:

- A modification of the trading plan requires the pre-approval of a Compliance Officer.
- The trading plan may only be modified when the person modifying the trading plan is not aware of material non-public information and when there is no quarterly, special or other trading blackout in effect with respect to the person adopting the trading plan.
- The first trade under the modified trading plan may not occur until 90 days following modification of the plan. The existing plan would remain in effect until the modified plan comes into effect.

9. Terminations Under the Plan:

- Y-mAbs must be promptly notified of any termination of the trading plan, including any suspension of trading under the plan.
- If the person that adopted the trading plan terminates the plan prior to its stated duration during a quarterly blackout period, he or she may not trade in Y-mAbs's securities until the end of that blackout period.
- Once terminated, a person cannot enter into a new trading plan until 90 days following termination of the plan, subject to the requirements of this Policy.

10. A person may only have a single operative plan at a time and may only modify or terminate a trading plan once in a one-year period.

11. Y-mAbs prohibits the adoption of multiple, overlapping trading plans.

12. If the trading plan grants discretion to a stockbroker or other person with respect to the execution of trades under the plan:

- trades made under the trading plan must be executed by someone other than the stockbroker or other person that executes trades in other securities for the person adopting the trading plan;
- the person adopting the trading plan may not confer with the person administering the trading plan regarding Y-mAbs or its securities; and
- the person administering the trading plan must provide prompt notice to Y-mAbs of the execution of any transaction.
- All transactions under the trading plan must be in accordance with applicable law.

13. The trading plan (including any modified trading plan) must meet such other requirements as a Compliance Officer may determine.

14. A Compliance Officer must approve and keep a copy of each adopted trading plan.

15. A Compliance Officer may require public disclosure of the adoption, modifications, and terminations of a 10b5-1 plan as a condition to approval.

16. Section 16 and other filings will indicate that transactions are made pursuant to a plan.

## **XII. ADDITIONAL INFORMATION**

### **A. Availability of Policy**

This Policy will be made available to all Y-mAbs directors, officers, employees, consultants and independent contractors when they commence service with Y-mAbs. You are required to acknowledge that you understand, and agree to comply with, this Policy by returning a signed copy of the Insider Trading Compliance Statement, which appears at the end of the Policy, to a Compliance Officer.

### **B. Amendments**

Y-mAbs is committed to continuously reviewing and updating this Policy and any other Y-mAbs policies and procedures. Y-mAbs therefore reserves the right to amend, alter or terminate this Policy at any time and for any reason, subject to applicable law. A current copy of Y-mAbs's policies regarding insider trading may be obtained by contacting a Compliance Officer.

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**Insider Trading Policy Compliance Statement**

**TO:** Y-mAbs Therapeutics, Inc.

**RE:** Insider Trading Compliance Policy of Y-mAbs Therapeutics, Inc.

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I have carefully reviewed the Insider Trading Compliance Policy (the “Policy”) of Y-mAbs Therapeutics Inc. (“Y-mAbs”), and understand its provisions. I certify that, to the best of my knowledge, I have complied with the Policy and its procedures since such date that I reviewed the Policy (or since the commencement of my employment with, or service to, Y-mAbs, if after such date) and that I will continue to adhere to the Policy and these procedures in the future.

Without limiting the preceding paragraph, I understand that a Compliance Officer will be required, and will have the discretion to, exercise his or her judgment in determining whether (a) if I am subject to pre-clearance of trades or required to trade under a Section 10b5-1 plan, to approve particular transactions by me in Y-mAbs securities or my establishment of any plan for trading in Y-mAbs securities or (b) to subject me to any temporary “blackout periods.” I recognize that, if I am subject to pre-clearance of trades or required to trade under a Section 10b5-1 plan, a Compliance Officer will be required to analyze and assess any request I may make to engage in a particular transaction (including, but not limited to, gifting Y-mAbs securities or trading outside of my plan due to financial hardship) or to establish a plan relating to trading in Y-mAbs securities, based on information available to the Compliance Officer at the time of the request and in the context of Y-mAbs’s intent to preserve its reputation for maintaining the highest legal, business and ethical standards, as well as Y-mAbs’s obligation to comply with all laws and regulations pertaining to insider trading. I acknowledge and affirm that the Compliance Officer’s determination with regard to any particular transaction, plan, or blackout period will be made solely on behalf of, and for the benefit of, Y-mAbs and will not constitute legal advice to me, and I further acknowledge and affirm the Compliance Officer’s right to make that determination in his or her sole discretion. I hereby agree to be bound by, and to accept without objection, any determination of the Compliance Officer not to permit any such transaction or plan, or to subject me to any such blackout period.

I realize that failure to observe and comply with all of the provisions contained in the Policy may subject me to disciplinary action by the Company, including discharge.

Acknowledged by:

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

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

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

Title: \_\_\_\_\_

**Exhibit A**  
**(Updated February 24, 2022)**

1. All Section 16 Individuals;
2. All senior officers and directors, including without limitation, the Chief Commercial Officer, the Director of Sales & Marketing, the General Counsel, and the Chief Legal Officer.
3. All Finance Insiders and other employees in the Finance Department;
4. All individuals who regularly attend executive team meetings; and
5. All other individuals with a title of Vice President or above.