

# Stoke Therapeutics'

# Code of Conduct

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# A Message From The CEO

We at Stoke have been brought together by the opportunity to change the course of severe diseases. This opportunity comes with a responsibility: **That we act with integrity and hold ourselves to the highest legal and ethical standards.** We look to our values to guide our behaviors and we look to our Code of Conduct as a set of core principles for how we conduct business.

This Code is not intended to cover every aspect of our business. We have created the Code to be a pragmatic and approachable resource that you can refer to whenever you have questions such as decisions you are faced with, how to interact with key stakeholders, and what is expected of you as a Stoke team member and ambassador for the company. As you will see, a lot of the guidance comes down to **good judgment and common sense**, but as a rapidly growing company, we will all be faced with situations that are new to us. While we must continue to work with a sense of urgency, we also must make sure we pause whenever we have doubts or concerns to ensure we are moving forward wisely and responsibly. **Never hesitate to ask if you aren't sure what to do.**



Everyone here at Stoke is expected to read, understand, and act in accordance with our Code. Adhering to the Code is the single most important thing we can do to maintain the respect and trust of those who matter to us, including our colleagues, our business partners, healthcare providers, and, most importantly, patients and their families.

**Edward M. Kaye, M.D.**  
*Chief Executive Officer*

# Our Mission, Vision, and Values

Build and Sustain  
Culture



## Boldly Restoring Genetic Health

Addressing the underlying cause of severe diseases by upregulating protein expression with RNA-based medicines.



### Show Up REAL

Be Respectful,  
Empathetic, Authentic, and  
Listen to learn.



### Speak Up and Deliver

Be transparent in  
expressing your perspective  
and commit to take action.



### Fire Up Fearless

Be courageous and thoughtfully  
navigate opportunities,  
challenges, and change.





# Purpose of the Code

Stoke Therapeutics' Code of Conduct ("Code") sets the standard for our behavior, our culture, and is the catalyst that guides us in our actions.

This document provides guidance in our everyday activities to our employees as well as any third party representative we work with. The Code applies to everyone at Stoke and establishes a common set of guiding principles for how we behave. It applies to all employees, officers, and directors of the company.

## Who is Required to Read, Understand, and Follow the Code?

Every director, officer, employee, independent contractor, and consultant of Stoke is expected to read, understand, and follow the Code. A copy of the Code is provided to each new hire when they join Stoke as well as to third parties who act on behalf of Stoke. We are all expected to read the Code thoroughly and understand the intricacies outlined below.



## Does the Code Cover Everything?

No Code, policy, or procedure can cover every potential situation. In situations, where you face decisions not covered in a policy or procedure, please consider the following questions:

- Is it ethical and legal?
- Is it in accordance with Stoke's Code, policies, and procedures?
- Is it aligned with our values?
- Would I be able to explain this comfortably to friends and family?
- Is it the right thing to do?

If the answer to any of these questions is **NO**, then do not do it. If you are unsure, then reach out to your manager, or other resources listed within the Code.



# Speaking Up and Reporting Concerns

Our work, culture, and mission depend on all of us maintaining our culture of excellence – in our science and in everything we do.

Speaking up to raise concerns, seek clarification, or report non-compliant behavior helps create, maintain, and protect our culture. Each of us should ask questions when we are not sure of what to do or what Stoke policies require. We are also expected to report known or suspected violations of any Stoke policies or any other suspicious, threatening, or inappropriate behavior. Not seeking clarification or reporting concerns puts Stoke at more risk.

We do not tolerate retaliation. Individuals are expected to and encouraged to speak up. Retaliation of any form against any employee for speaking up or cooperating with an investigation is prohibited. Retaliation claims will be investigated thoroughly.

## How to Speak Up or Ask Questions

When speaking up or asking questions, you are encouraged to first speak with your direct manager. Managers are expected to support the Code, maintain an open-door policy, and to take any concern raised seriously. However, if you are not comfortable speaking with your manager, you have various other options, including reaching out to any other manager, any member of senior management, the Human Resources Department, the Legal Department, or our anonymous Whistleblower Hotline. The Whistleblower Hotline can be accessed via a 24-hour per day, 7-day per week hotline or a dedicated website, which can be used to report employee concerns. The website and hotline are operated by a third party service provider.

Helpline

855-395-5571

<http://www.whistleblowerservices.com/STOK>

## Potential Consequences of Violations of the Code

Violating this Code, our policies or applicable law may result in disciplinary action, up to and including termination of employment. In addition, any manager who directs or approves violations of the Code, or who has knowledge of such conduct and does not immediately report it, may also be subject to disciplinary action. We may need to report wrongdoing that violates applicable laws to governmental authorities and some violations may also result in civil or criminal liabilities for Stoke and the individuals involved.



For more information review our Employee Handbook and Whistleblower and Complaint Policy

# Celebrating Diversity, Inclusion, and Belonging

We are unrelenting in our pursuit of a culture that welcomes diversity and promotes respect for one another.

Showing Up Real by bringing our authentic self to work is fundamental to our success. Our culture of purposeful inclusion and a passion for helping people includes a commitment to respect and the celebration of our unique backgrounds and differences.

Stoke is an Equal Opportunity Employer that does not discriminate on the basis of actual or perceived race, gender (including identity or expression), color, religion, national origin, age, disability, sex, sexual orientation, or any other legally-protected characteristic. We make decisions based on merit, using objective criteria, and business considerations.

Discrimination, intimidation, harassment, or any other disrespectful behavior is prohibited at Stoke. Intentional and unintentional disrespectful behavior that disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment is prohibited.

We hope to create a work environment where we all feel safe and confident in being who we are. Our different backgrounds and perspectives are important elements of our diverse culture and our work to discover and develop new medicines.



## Fostering Inclusion

- Celebrate differences** to create honest and open conversations
- Look for opportunities for **cultural awareness**
- Develop informal **mentor programs**
- Support each other during difficult situations
- Consider **other perspectives**

### To Show Up Real we:



- Treat others with respect
- Embrace diversity and promote inclusivity
- Challenge our conscious and unconscious biases
- Act respectfully and professionally
- Report discrimination, harassment, or any other disrespectful behavior

### To Show Up Real we never:



- Cause emotional or physical harm to anyone
- Threaten, bully, or make inappropriate remarks about anyone
- Discriminate against anyone
- Tolerate any inappropriate behavior



For more information review our Employee Handbook



# Maintaining a Safe Work Environment

Everyone should be safe and healthy working at Stoke.

Stoke is committed to creating and maintaining a working environment that is comfortable, safe, and healthy for employees, partners, or anyone else we interact with. We do this by following applicable health, safety, and environmental procedures. Situations that may pose a healthy, safety, or environmental hazard should be reported immediately.



## To maintain a healthy and safe work environment we: ✓

- Learn and understand applicable safety and health rules for our roles and locality
- Follow safety procedures
- Report unsafe situations, injuries, and accidents
- Report violence or threatening situations
- Maintain neat, safe working environments

## To maintain a healthy and safe workplace we never: ✗

- Threaten others or use violence
- Ignore safety concerns
- Work while impaired due to the influence of alcohol, illegal drugs, or controlled substances
- Permit weapons of any kind in the workplace



## Speak Up and Deliver

**Maria was on her way back to her desk when she noticed a broken ceiling tile on the ground. Since she was in hurry to log into a team call, she quickly walked around the debris on the floor and went to her desk. Did Maria do the correct thing?**

No, the debris on the floor would be considered a safety hazard, therefore Maria should have promptly reported the incident to the Facilities team. Cleaning up the debris in this situation would not be expected as it may not be safe for Maria. We should only clean up or remove safety hazards if it is safe to do so (e.g., drying a puddle of water).



# Avoiding Conflicts of Interest



Conflicts of interest arise when our personal interests could interfere with our ability to perform our employment responsibilities in the best interest of Stoke. Even the appearance of a conflict of interest could be harmful to Stoke's reputation and overall business. We are all expected to follow good judgement and avoid situations that can be perceived as a conflict of interest.

It is our responsibility to avoid any actual conflict and seek to avoid any perceived or potential conflict that may exist between Stoke and an employee or member of their immediate family. Many situations are not clear-cut. When we are not sure if a situation is a conflict of interest, we should disclose the matter to our Compliance Officer. Stoke can better plan for and create remedial measures when we disclose actual, perceived, or potential conflicts of interest.



For more information review [Employee Handbook](#)

## Some Examples of Potential Conflicts of Interest

- Having a job with, or providing a service to, a competitor
- Outside employment that is deemed to interfere with an employee's time and attention in a manner that impacts Stoke
- Diverting an opportunity for Stoke away from the company toward yourself or your family or friends
- Serving on the governing board for any non-profit organization whose mission relates to a politically sensitive topic
- Competing in any way with Stoke
- Providing anything of value to an employee of any government agency
- Personal relationship with a third party vendor
- Owning a material interest in a Stoke customer, partner, or vendor unless through an investment where we do not directly or indirectly control the organization (e.g., a mutual fund)

## Would Involvement in Political Activities be a Conflict of Interest?

We support our employee's decisions to perform their civic activities and participate in political activities as long as these activities do not interfere with our business. We have the right to voluntarily participate in political activities in our personal capacity and make political contributions. However, we should always ensure that the views that we are portraying to the public are of our own and not those of Stoke, including making sure we are not identified or portrayed as a Stoke representative. In addition, Stoke reserves the right to communicate its position on important issues to elected representatives and other government officials.



# Using Social Media



For more information review our [Social Media Policy](#).



Social media helps us engage with others in our personal and professional lives. Social media can be a powerful tool, but has risks associated with it. As an employee of Stoke, you are an ambassador of the company and should always consider the impact of your communications. You are encouraged to share Stoke's social media posts, but please adhere to our policies and procedures when doing so.

## To leverage the value of social media, we:



- Practice good manners, treat others with politeness and courtesy
- Protect our confidential information
- Respect the privacy of our employees and patients
- Consider whether the information could have a negative impact on ourselves, a co-worker, a partner, or Stoke
- Report negative or inaccurate comments
- Report adverse events or product quality complaints

## To leverage the value of social media, we never:



- Comment or advise on specific products (Stoke's, our peer's or competitor's)
- Disclose confidential or proprietary information
- Provide medical advice, diagnoses, or clinical trial commentary
- Respond to negative or false comments



**Fire Up Fearless**

**When reading some of the comments on an Instagram post related to Stoke, Chen noticed that some of the information was incorrect. Should Chen respond in order to correct the information?**

Chen should not respond unless authorized to do so by Stoke. She should report the Instagram feed to Corporate Affairs. We should never take it upon ourselves to correct the record related to Stoke, our business partners, third parties, or competitors on social media unless authorized to do so. This prohibition includes hiding or disguising our identity in order to respond. We should never hide our identity when using social media related to Stoke.



# Interacting With Patients and Patient Advocacy Organizations

We put patients first in all of our activities.

We are in business to help people living with severe diseases. To do that, we strive to understand the patient perspective and experience. We recognize the importance of contributions from patients, caregivers, and patient advocacy organizations (“PAO”s) to patient healthcare decisions.

Interactions with patients or PAOs should be voluntary and in accordance with applicable industry guidelines. Our interactions with PAOs should be respectful and transparent. Interactions present opportunities to exchange balanced, accurate, and scientific information on diseases and available treatments.

Requests from patients or PAOs should be direct to Corporate Affairs.



## To maintain the independence of PAOs, we:



- Share accurate, balanced, scientific information
- Disclose financial and non-financial support to patient organizations
- Refer patients to their doctor and caregivers for healthcare advice

## To respect our patient communities, we never:



- Attempt to inappropriately influence a patient organization
- Apply undue influence on patient decisions
- Violate a patient’s privacy
- Seek to be the sole funder of a PAO
- Ask PAOs to promote our products



For more information review our [Interactions with Patients and Patient Advocacy Organizations Policy](#)



# Maintaining Patient Safety and Product Quality

It is important that all of us:

- Learn to recognize adverse events and product quality complaints;
- Understand our processes for reporting and handling adverse events and product quality complaints; and
- Report adverse events and product quality complaints in a timely manner.

Information related to adverse events and product quality are important for Stoke employees to know, and often we have reporting obligations to the Food and Drug Administration (“FDA”) and other authorities.

## What are Adverse Events and Product Quality Complaints?

An adverse event is any unpleasant medical occurrence for a patient or clinical trial subject, including any:

- Symptom or disease; and
- Unfavorable or unintended sign.

A product quality complaint is any communication (electronic, verbal, or written) that implies deficiencies with a product.

## Reporting Obligations Extend Beyond Work

We may come across adverse events or product quality complaints in a wide variety of ways, including electronic (e.g., social media), verbal (e.g., conversations), or written communications (e.g., letters). Regardless of where we learn of an adverse event or product quality complaint, we are expected to promptly report what we know, even if we only know minimal information. We should never assume someone else will make the report.

## Our Commitment to Quality

We follow applicable laws, regulations, and standards aimed at product safety, efficacy, and quality including Good Laboratory, Clinical, Vigilance, Distribution, and Manufacturing practices. Third party contractors are expected to abide by these same practices and provide oversight to ensure quality.



# Protecting Data and Maintaining Privacy

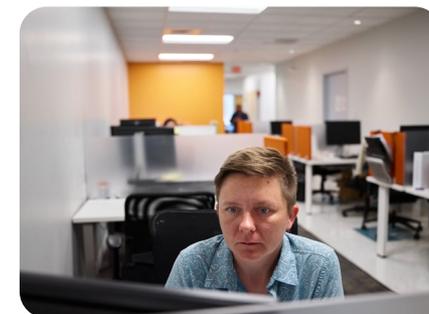
To preserve the trust of our patients and business partners, we do our best to protect their information.



All of us are responsible for ensuring the protection of information entrusted to us. Unauthorized use or disclosure of information collected by Stoke or provided to us from an external source can expose us to liability as well damage our reputation. We follow applicable industry guidelines, ethical standards, regulations, and laws as we collect, use, store, disclose, and transfer data. Generally, we prefer to use deidentified or aggregated data. However, when that is not feasible, we follow our procedures to use Personal Data (e.g., obtaining consent when required or documenting the rationale for the collection of the information).

When we do handle personal data, we follow these main principles:

- Only use personal data for the specific purpose for which it was collected and disclosed to the individual;
- Take reasonable steps to ensure any personal data we hold is accurate and up to date;
- Protect personal data through appropriately designed security measures;
- Only share personal data with those who have a legitimate business need for the personal data;
- Follow Stoke policies and procedures for storing and destroying personal data; and
- Immediately report any data breach, suspected data breach, or inappropriate handling of information or data to Stoke's Privacy Officer.



## What is Personal Data?

Personal Data is information relating to an identified or identifiable person. The definition of Personal Data is broader than what we may traditionally think of as regulated health and financial information and can include other identifiers including names, addresses, phone numbers, emails, biometric information, website cookies, online identifiers, health plan numbers, or factor specific to a person's physical, physiological, genetic, mental, economic, cultural, or social identity.



For more information review our [Information Security Policy](#)



# Upholding Ethical Standards in Research



As a highly ethical, patient-centric organization, we conduct our research activities to the highest standards, consistent with applicable laws, regulations, and ethical standards. We also follow and require our partners to follow these regulations.

Research is the lifeblood of our company. Research should be performed with a clear purpose that is intended to advance Stoke's strategic objectives. Investigators should be selected based on their expertise, their ability to meet enrollment requirements, and to meet criteria related to the study protocol and applicable regulations. The total number of investigators, patients, and sites should be determined based on the study objective and design. A written agreement between Stoke and each investigator/site must be approved by the Legal department prior to any research.

Compensation to research participants can potentially raise issues under the Anti-Kickback Statute and/or standards for ethical clinical practice. Therefore, approval from the Legal department is required prior to agreeing to or providing any payments to research study participants. Employees should approach their supervisor or the Compliance Officer with any questions about ethical matters.



## To uphold ethical standards in research, we:



- Obtain appropriate consent from subjects
- Protect patient privacy and confidentiality in all aspects of research
- Ensure study funding and support is compliant and follows applicable rules and laws

## To uphold ethical standards in research, we never:



- Participate in research misconduct (e.g., falsification, changing of data, or modifying results)
- Tie compensation to the outcomes of clinical research
- Use study funding or payments to unduly influence patient or investigator decisions



# Ethical Interactions with Healthcare Professionals, Healthcare Organizations, and Public Officials

Ethical Interactions improves both patient care and the practice of medicine.



The independence of a healthcare professional (HCP”) is essential. We work with HCPs and Healthcare Organizations (“HCO”)s in a variety of ways to support our mission and objectives. We have consulting arrangements with HCPs because we value their expertise and use their guidance to support our work.

When interacting with an HCP we follow our applicable policies and procedures and applicable laws, and we are careful to avoid even the appearance of undue influence on an HCP’s independent judgement. We make sure that we do not directly or indirectly influence or encourage HCPs to sell, prescribe, or purchase our products.

Interactions with an HCP, HCO, or Public Official should be based on a legitimate need and only if the service cannot be provided by someone at Stoke. No part of the engagement should influence the service provider’s prescribing behavior. We do not interact with HCPs on the Office of the Inspector General’s (“OIG”) “List of Excluded Individuals/Entities,” the FDA or UK Medicines and Healthcare Products Regulatory Agency debarment list, or any HCP that has exhibited behavior that does not align to our culture.

## To ensure ethical interactions we:



- Document the legitimate need for the interactions or services provided
- Pay Fair Market Value (“FMV”) for the services provided
- Select HCPs based on their expertise and ability to perform the services
- Report regulatory violations, suspected regulatory violations, or potentially harmful or dangerous conditions

## To ensure ethical interactions, we never:



- Seek to influence HCPs or HCOs to prescribe, refer, or sell our products through compensation or other rewards
- Seek to reward HCPs or HCOs for past prescriptions
- Start HCP engagements prior to signing the contract



# Ethical Interactions with Healthcare Professionals, Healthcare Organizations, and Public Officials

## Consulting Arrangements

Stoke engages with consultants who have expertise in their field for a variety of services. Consultant engagements should be in accordance with our policies.

## Prohibition of Gifts and Entertainment

The focus of our interactions with HCPs, third parties, and business partners should be limited to legitimate business purposes. We should avoid situations where we might appear to be influencing an HCP, third party, or business partner when providing goods and services, including meals. We also comply with Stoke policies and applicable laws and regulations regarding the giving or receiving of gifts, entertainment and hospitality to or from any HCP. Educational items designed primarily for the education of patients or HCPs can be provided on an occasional basis if pre-approved, modest in value, and never intended to offset usual operating expenses for a practice.

## Special Concerns for Public Officials

Public Officials often can be both our customer and regulator. Extra restrictions may apply to interactions with these individuals. Public Officials include an individual or firm directly employed through or acting on behalf of a government body, or government-controlled business. This can often include scientists and HCPs who are employees of publicly funded institutions (e.g., NIH, Veteran's Affairs).



For more information review our [Policy on Arrangements with Consultants](#)



# Honest, Effective Communication

We communicate for many reasons and our communications can influence decisions made by an HCP or other external stakeholders. Communication may be provided in many ways. External communications are typically pre-approved for the content of the message and the audience. Discussions and materials are accurate and not misleading and comply with applicable Stoke policies, laws, and regulations. Honest, effective communication is clear, correct, concise, careful, and conscious of the applicable context.

## To communicate honestly and effectively we:



- Provide truthful information about products and research
- Provide appropriate balance of risks and benefits
- Only use approved materials and messages intended for a particular audience
- Follow appropriate procedures around handling questions about Stoke investigational products
- Assume a private conversation could become public
- Provide the context for statements made

## To communicate honestly and effectively, we never:



- Attempt to inappropriately influence
- Communicate information not authorized in that specific jurisdiction
- Discuss favorable information or opinions previously regarded as valid, but which have been rendered invalid
- Imply that the study represents a larger or broader experience with the drug than it does
- Intentionally leave out risk information to create a misleading favorable impression

## Engaging in Scientific Exchange

We recognize that sharing scientific information about our research and products is key to our communication with HCPs and other external stakeholders. We share scientific information in an honest and transparent manner.

Such scientific exchange:

- Uses objective language and contains appropriate safety-related data;
- Is scientifically accurate and balanced;
- Is non-promotional and limited to appropriately trained scientific, clinical and medical personnel;
- Only provides off-label data in direct response to an HCP's unsolicited question; and
- Always provides appropriate context.



# Intolerance for Bribery and Corruption

Stoke is committed to doing what's right and making a difference.

In compliance with applicable global anti-bribery, anti-corruption, export control, and anti-boycott laws, we do not, nor do we give the appearance of, offering, giving, soliciting, accepting, or receiving any form of kickback or bribe. Any transfer of value is documented in accordance with our approved processes. Even just the appearance of corrupt behavior can damage our reputation and trust with our communities, patients, and business partners.

The actions of our partners, including any third party we work with, represent us. We are responsible for their direct or indirect actions performed on our behalf.



## To build trust with our patient communities we:



- Pay fair market value compensation for services in accordance with written agreements
- Conduct due diligence prior to engaging or working with any third party
- Only work with third parties that share similar values
- Monitor the actions of third parties
- Record payments accurately and honestly in our books and records

## To respect our patient communities, we never:



- Provide expensive or lavish meals, gifts, or any entertainment to public officials or HCPs
- Offer or give bribes or kickbacks
- Request or accept any improper advantage
- Make a payment to expedite or secure a routine governmental action that is not a published fee



For more information review our [Anti-Corruption Policy](#)

# Avoiding Insider Trading

▶ For more information review our Insider Trading Policy



During our work, we encounter information that is material non-public information about Stoke, our business partners, or other third parties. You are prohibited from using this "inside" information in connection with trading in Stoke's or another company's securities. Insider trading laws also prohibit informing (or "tipping") others who may then trade on that information.

At Stoke we have adopted an Insider Trading Policy that we require employees to review and follow. We all must exercise the utmost care when in possession of material non-public information. Our Insider Trading Policy provides guidance on the sorts of information that might be non-public and material for these purposes and guidelines on when and how employees may purchase or sell shares of our securities.



If you have any questions, are unsure whether you are authorized to trade or whether the current trading window is open under our Insider Trading Policy, consult with the Legal department before trading.

## To avoid insider trading we: ✓

- Disclose confidential information only to the people who need to know
- Take measures to ensure that third parties protect our confidential information
- Preserve the confidentiality of information third parties provide to us as if the information were our own
- Follow trade windows and guidance set forth by Stoke

## To avoid insider trading, we never: ✗

- Buy or sell a company's securities based on material non-public information
- Provide information to someone else ("tipping") who may trade based on that information
- Discuss confidential information in public settings



Fire Up Fearless

**On his way to lunch with a friend who does not work at Stoke, Miles received the news of an important data read out for a study. Can he share the news with his friend during lunch?**

No. The information would be considered confidential information that has not yet been shared with the public (non-public). Therefore, Miles should be careful to not share this news outside of Stoke. As a reminder we should only share confidential information with Stoke colleagues who need to know.

# Responding to External Inquiries



To protect our integrity and professional reputation, only approved spokespersons may speak on the behalf of Stoke.

Stoke has identified specific roles and individuals who can represent our company to the public. Only these individuals can share information about Stoke. Inquiries, questions, and requests must be directed to the appropriate department. If you have been asked to speak on behalf of the company, including participation in an interview, please contact someone in Legal or Corporate Affairs.



## Speaking Up and Delivering

**Ming is called by a reporter looking for some basic information about Stoke. Can Ming answer her questions?**

No, even simple questions should be routed to Corporate Affairs. Uncoordinated or incomplete communications could pose legal problems, for example, if the released information was material inside information.

## Cooperating with Government Investigations

Our industry is highly regulated, which then means significant governmental scrutiny. We may experience routine and non-routine government interactions. The difference between a routine and non-routine government interaction is whether the interaction is part of the expected process of conducting our business. If you are contacted by a government authority at work, home, or elsewhere in relation to an external investigation or a non-routine government enforcement agency request, you should immediately notify the Legal department for assistance.

### To build trust with external stakeholders we:



- Cooperate with requests for information, visits to our facilities, inspections, audits, and investigations
- Notify the Legal department immediately of any requests related to a non-routine government interactions
- Discuss an investigation or audit only if the Legal department has instructed you to discuss
- Provide truthful, complete, and timely information

### To respect our external stakeholders, we never:



- Respond to government requests on our own
- Omit information or provide misleading information
- Guess or make up information
- Create, alter, or destroy records (including emails or texts) to impede or improperly influence a request or anticipated request from a government entity



For more information review our Corporate Communications Policy

# Stoking Change



Doing what is right and making a difference in our communities.



As a company we strive to contribute to creating a better, more equitable world, and we encourage our employees to do the same. Stoke is committed to being a good corporate citizen by following applicable social, environmental, animal research, and human rights related laws. We are also committed to providing educational and career development opportunities for underserved students in our communities. Stoke strives to work with third parties who share our values.

Sustainability is an important responsibility for a business. Stoke understands the importance of protecting the natural environment and supports sustainable practices in our organization. We work to reduce our impact on the environment and encourage everyone at Stoke to do the same.

Stoke considers requests for charitable donations as well as scientific and educational grants from both organizations and philanthropic programs. For more information, please contact Corporate Affairs.

**Jayati, a Stoke employee, who was passionate about the environment was asked to speak at an upcoming fundraiser for a charity where she had been volunteering for the last 10 years. What should she do?**

Jayati can speak at the event, however she should make sure it is clear that she is there as an individual and not as a representative of Stoke (e.g., not be introduced as a Stoke employee) as only approved company spokespersons can represent Stoke. Employees are encouraged to, in their own time and with their own resources, participate in civic and volunteer events of their choosing, so long as such events do not create actual or perceived conflicts of interest.



**Speak Up and Deliver**



For more information about Diversity, Inclusion, and Belonging go to page 5



# Competing Fairly

Stoke competes fairly and believes in free, fair, and open markets.

Antitrust and fair competition laws help protect consumers by promoting healthy and fair competition. These complex laws do vary, but their aim generally is to prevent unfair business practices. Because these laws apply to both formal and informal agreements, care must also be taken in discussions with competitors to limit topics to those with a lawful and non-competitive purpose.

We are committed to only gathering and using business information on our competitors in an honest and ethical manner and in ways that do not violate any laws or confidentiality obligations. This commitment also extends to any third parties who work on our behalf.

## To promote fair competition, we:



- Avoid activities that may appear to restrict trade or competition
- Report situations where inappropriate topics were mentioned or discussed with competitors
- Protect and maintain confidential company information
- Follow applicable trade and customs regulations

## To promote fair competition, we never:



- Discuss with competitors pricing, cost, or terms or conditions
- Abuse a dominant market position or restrict trade
- Discuss unfairly restricting trade or excluding a company
- Divide markets or customers with competitors
- Conduct business with a third party that is subject to trade restrictions



## Speak Up and Deliver

**In reviewing responses to an RFP, Sadio noticed that one vendor had a significantly lower bid. Does Sadio need to look further into the lower bid?**

Sadio should perform additional due diligence into why the bid was significantly lower. We cannot work with vendors who compete unfairly. Prior to working with new vendors, Stoke must conduct due diligence to ensure we are working with the right partners. Furthermore, we are expected to monitor our partners throughout the relationship and conduct additional due diligence regularly (e.g., when renewing a contract).

# Building Trust With Third Parties

How we interact with and treat third parties puts our values into action.

We are responsible for the actions taken or not taken by a third party on our behalf. As our representatives, their behavior can positively or negatively impact our reputation. A third party cannot do anything that we ourselves could not do. Therefore, we work with third parties that share our values and commitment to ethical business conduct. We conduct due diligence on all third parties we work with. Overseeing activities conducted by our third parties is critical for our business. We work to ensure our third parties understand our expectations and are properly trained. Stoke selects third parties based on legitimate business needs. Our employees act ethically and honestly when interacting with third party entities.



## Performing Due Diligence

**Due diligence** consists of checks we conduct to ensure a third party would be or is an appropriate business partner. We monitor our third parties to help ensure they operate in compliance with our Code of Conduct and contractual obligations. Some questions we consider before engaging with third party include:

- Are any red flags or concerns identified from due diligence screening?
- What are the quality management systems in place for the third party?
- Can they meet the applicable compliance and regulatory requirements?
- What are the legal and cybersecurity risks associated with this third party?



Report any potential or concerning behavior involving a third party to the Legal department



# Protecting the Assets of Stoke and our Business Partners

We act as stewards of the assets entrusted to us.

Stoke and our business partners entrust us with assets. Misuse, loss, or damage to assets can have negative impacts for us and for our stakeholders. Personal devices should not be used for work (except for devices setup in accordance with IT's processes) as these devices may not have adequate security measures. Discussions about or related to confidential information or intellectual property should be avoided in public, which includes elevators, public transportation, airports, airplanes, restaurants, and other similar areas.

## Company Assets

Include anything the company owns (e.g., computers, internet connections, office space, and other assets for us to use for business purposes).

We safeguard our assets by:

- Complying with Information Technology ("IT") standards
- Limiting personal usage
- Using assets in accordance with our policies and procedures
- Never transmitting any profane, vulgar, sexual, or other related content
- Never using assets improperly or carelessly

## Confidential Information

Includes aspects of the company that are not filed in public records (e.g., trade secrets, financial information, business plans, marketing strategies).

We are good stewards by:

- Avoiding company discussions in public areas
- Only sharing with authorized individuals after signing confidentiality agreements
- Sending any confidentiality agreements that we are asked to sign to the Legal department
- Respecting confidentiality agreements of former employers
- Protecting the confidential information of our business partners

## Intellectual Property ("IP")

Includes patents, copyrights, trademark, technology, regulatory data, and information about proprietary software and technology.

We protect IP by:

- Only sharing it with authorized individuals
- Disclosing to company management inventions or IP you create while employed at Stoke
- Protecting the IP information of our business partners



For more information review our Employee Handbook



# Accurate Record Management

Our stakeholders trust us to maintain the integrity of our financial and non-financial records. Records can be financial and non-financial and can come in many forms. Every one of us is expected to and is responsible for keeping accurate, complete, transparent, and timely records.

Records should be maintained, stored, and destroyed in accordance with local document retention procedures and applicable laws.



## To maintain accurate records, we:



- Document financial and non-financial records in an accurate and timely manner
- Ensure records are accurate, fair, and complete
- Properly store documentation supporting payment requests
- Submit invoices in a timely manner
- Cooperate with audits, investigations, or related processes
- Report any suspected fraud or circumventions of internal controls

## To maintain accurate records, we never:



- Delete, destroy, or alter any record outside of records destroyed in accordance with our retention policies and procedures
- Sign a document we are not authorized to sign
- Conceal or falsify any record, including budgeting information
- Make payments without documented approval



For more information review our [Reimbursement and Travel Policy](#)

# Boldly Restoring Genetic Health



We at Stoke have come together with a unique approach to RNA science, and a fundamental belief that we can do something no one else has done. We are united in our authenticity and committed to being true to ourselves, to our colleagues, and to the people with severe diseases who are counting on us. We are driven yet caring, fast-paced yet thoughtful, diverse, and intentionally inclusive. Our values guide our work to deliver meaningful medicines for people who need them.

Stoke Therapeutics' Code of Conduct serves as the foundation of our culture by providing a baseline standard. While the Code is designed to help each of us make ethical and safe decisions, the impact of the Code comes down to each of us. We are responsible for understanding and following the Code.

Stoke will publicly disclose, to the extent required by applicable laws, rules and regulations, any waivers or amendments to the Code. Stoke's Board of Directors must approve any material amendment of the Code. Any waiver of the Code with respect to any Director or executive officer of Stoke may be made only by Stoke's Board of Directors while any other waivers may be made only by Stoke's Compliance Officer.

## Code Certification

### By signing below, I attest that:

- I have received, read, and understood Stoke Therapeutics' Code of Conduct;
- I agree to adhere to the Code as well as the other policies and procedures referenced within the Code;
- I am and have been compliant with the Code;
- I am not aware of any violations of the Code or any other policy or procedure by any colleague, third party, or other person; and
- I understand that violations of the Code or any other policy or procedure may result in corrective action, up to and including termination of my employment.

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Printed Name

Role

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Signature

Date (XX/XX/XXXX)



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