



# Environmental, Social & Governance Report

2022



## Our Vision

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A healthier tomorrow for patients with significant unmet medical needs.

## Our Mission

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To discover, develop and commercialize innovative first-in-class medicines that meet significant unmet medical needs.



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### DISCLAIMER AND FORWARD LOOKING STATEMENTS

This report has been prepared by Ardelyx, Inc. for informational purposes only, and not for any other purpose. This report may contain forward-looking statements that are based on our current expectations, estimates and projections about our industry, as well as management's beliefs and assumptions. Words such as "anticipates," "expects," "intends," "plans," "believes," "seeks," "estimates," "may," "will," and variations of these words or similar expressions are intended to identify forward-looking statements. Such statements are based upon the information available to us now and are subject to change. These statements are not guarantees of future performance and are subject to certain risks, uncertainties and assumptions that are difficult to predict, including without limitation governmental efforts to mitigate COVID-19, third-party business closures, manufacturing and supply chain disruptions. We undertake no obligation to update or revise any forward-looking statements. For a further description of the risks and uncertainties that could cause actual results to differ from those expressed in these forward-looking statements, as well as risks relating to our business in general, please refer to our Quarterly Report on Form 10-Q filed with the Securities and Exchange Commission (SEC) on November 4, 2022, and our future, current or periodic reports to be filed with the SEC.



## A Letter from the CEO

I am pleased to share with you our 2022 Ardelyx Environmental, Social and Governance (ESG) report, which demonstrates our dedication and progress toward this important work. During recent years, we have discovered just how resilient we truly are — as a company, as a society and as individuals. At Ardelyx, we have acted on opportunities that reinforce our collective commitment to invest in our people and the communities we serve to build a more equitable and sustainable society. Over the past year, we solidified our commitment to our ESG principles and goals by cultivating a workplace where diverse perspectives and experiences are welcomed and respected.

This report highlights contributions we have made in the pursuit of a more equitable and sustainable future. We know we can only achieve our goals with a strong culture built upon the values that represent the Ardelyx team — fearless, dedicated, inclusive, passionate.

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***We know we can only achieve our goals with a strong culture built upon the values that represent the Ardelyx team — fearless, dedicated, inclusive, passionate.***

### 2022 Ardelyx Corporate and ESG Highlights

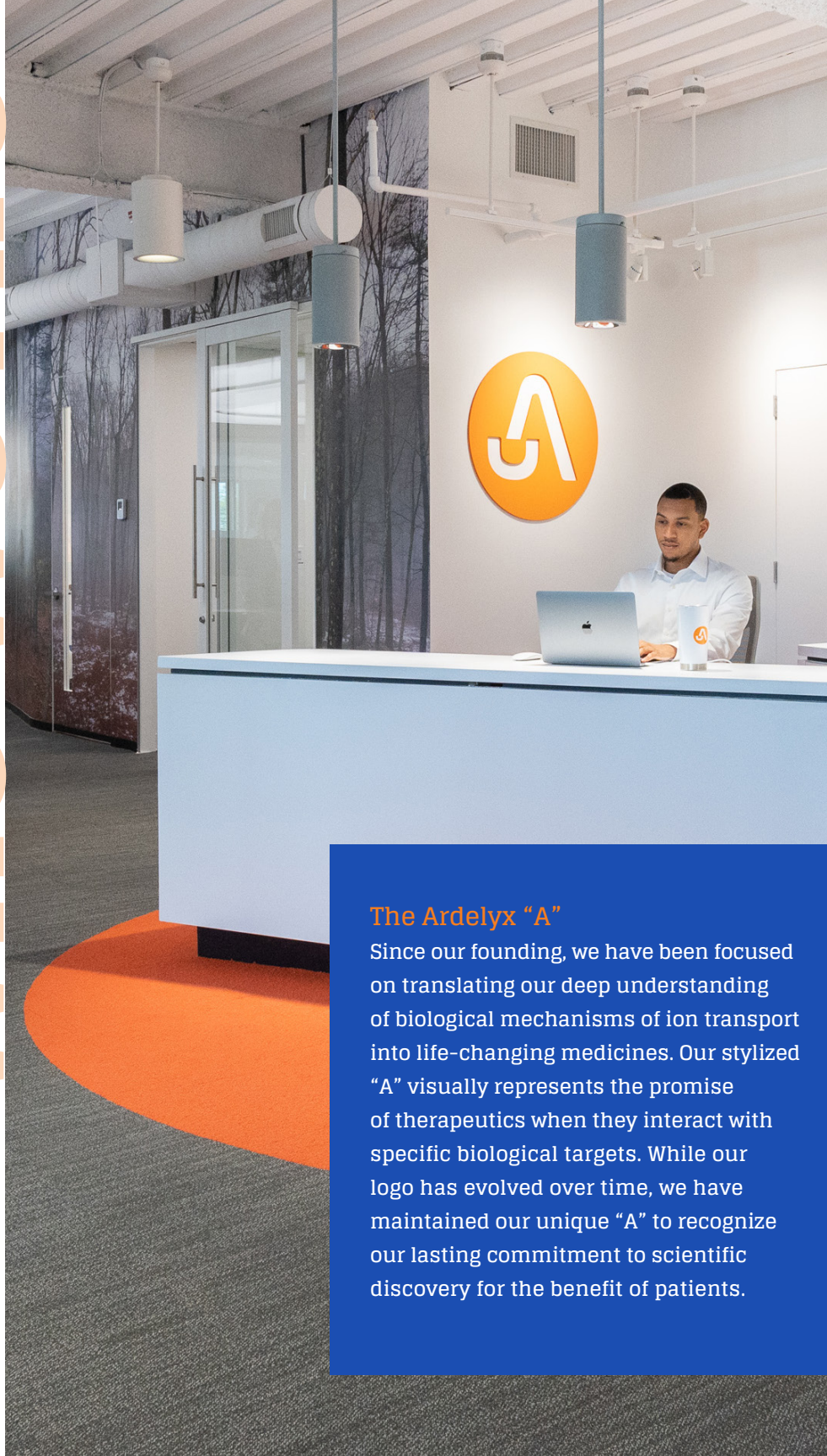
- Created ArdelyxAssist™, a patient services program designed to provide a broad range of access and affordability support for patients and health care providers
- Proud financial sponsors of the California Life Sciences Association Racial and Social Equity Initiative, a first step in a unified effort for the life sciences industry in California to do more for the under-served and under-represented
- Donated more than \$2 million to support educational programs for healthcare providers, patients and caregivers
- Named one of the “Deloitte Technology Fast 500™,” a ranking of the 500 fastest-growing technology, media, telecommunications, life sciences, fintech and energy tech companies in North America, now in its 28th year
- Donated more than 11 pallets and 6 truckloads of R&D supplies and equipment to non-profit STEM organizations.

While our work is not done, I am proud of the progress we have made and the commitment that exists within our organization to achieve our ESG goals. We look forward to continuing to work with our stakeholders to shape a better future for all.

**Mike Raab**

President and Chief Executive Officer





## The Ardelyx “A”

Since our founding, we have been focused on translating our deep understanding of biological mechanisms of ion transport into life-changing medicines. Our stylized “A” visually represents the promise of therapeutics when they interact with specific biological targets. While our logo has evolved over time, we have maintained our unique “A” to recognize our lasting commitment to scientific discovery for the benefit of patients.

Since our founding in 2007, Ardelyx has been dedicated to improving the lives of patients by discovering, developing and commercializing innovative first-in-class medicines that address significant unmet medical needs.

Using our discovery model, which recreates environments within certain areas of the gastrointestinal tract and kidney, Ardelyx scientists have been able to elucidate new and previously unexploited ion transport mechanisms. Focusing on these mechanisms, we have created targeted, small molecule drugs that are orally active but with limited systemic absorption, aiming to develop potent and efficacious therapies that minimize the side effects and drug-to-drug interactions frequently encountered with traditional, systemically absorbed medicines.

Ardelyx has commercialized its first approved product, IBSRELA® (tenapanor), which is available in the United States and Canada for treatment of irritable bowel syndrome with constipation (IBS-C) in adults. Ardelyx is developing XPHOZAH® (tenapanor), a novel product candidate for the control of serum phosphorus in adult patients with chronic kidney disease (CKD) on dialysis, which has completed three successful Phase 3 trials. Ardelyx has a Phase 2 potassium lowering compound, RDX013, for the potential treatment of elevated serum potassium, or hyperkalemia, a problem among certain patients with kidney and/or heart disease and an early-stage program in metabolic acidosis, a serious electrolyte disorder in patients with CKD.



# Our Values

At Ardelyx, we foster a culture of integrity and hold our employees, contractors and other representatives acting on our behalf to a high standard of business and ethical conduct. Our core values — fearless, dedicated, inclusive, passionate — guide how we treat each other, our customers and our patients.





# About this Environmental, Social, and Governance (ESG) Report

The Ardelyx inaugural ESG report marks our effort to highlight some of our current practices and initiatives in several important areas. There are four main sections in this report: Patients, Our Team, Environmental Management and Governance and Leadership. As you will see, in some areas our efforts are long-standing and robust, while in others we are just beginning our journey. In preparing this report, we utilized the Biotechnology and Pharmaceutical industry standards published by the Sustainability Accounting Standards Board (SASB) to organize our efforts around the areas we believe are most relevant to our business and our stakeholders. Unless otherwise noted, data provided within this report is as of our 2022 fiscal year, which ended December 31, 2022. Unless the context requires otherwise, in this report the terms “Ardelyx”, “we,” “us,” “our” and “the Company” refer to Ardelyx, Inc.







## Ardelyx Commitment to Patients

As a company dedicated to advancing patient care, Ardelyx is committed not only to setting new standards in product innovation, but also to setting new standards in patient engagement.

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*Understanding the patient experience and developing meaningful relationships with the patient community is the foundation for all our activities. This patient-centric approach allows us to develop novel therapies that address the unmet needs of our patients. It makes us focus on clinical trial designs that represent the patient’s lived experience, and communicates empathy, knowledge and understanding to all our stakeholders.* — Laura Williams, Chief Medical Officer







# Patient Access and Affordability



Ardelyx created ArdelyxAssist™ an innovative, digitally forward, high-touch patient services program. ArdelyxAssist provides a broad range of access and affordability support for eligible patients and health care providers, with seamless integration into office work processes, and digital connectivity to patients and providers.

ArdelyxAssist streamlines patient and provider requests for assistance and helps provide eligible patients with appropriate resources, including copay assistance for eligible patients with commercial insurance. If a patient encounters a delay in obtaining coverage, is denied access by their insurance, or cannot afford their out-of-pocket expenses, they may qualify for free medication under one of our program support offerings.



# Quality Management and Drug Safety

Good practice guidelines and regulations in the life sciences industry (GXP) are cornerstones of responsible drug development. Our Chief Regulatory Affairs & Quality Assurance Officer serves as the focal point for adherence to Health Authority regulations and requirements in the conduct of related regulatory and GXP activities and updates our employees of any changes.

Ardelyx maintains a Quality Principles and Organizational Responsibilities Policy which applies to all GXP activities carried out by Ardelyx and its external partners, including Good Manufacturing Practice (GMP), Good Clinical Practice (GCP), Good Laboratory Practice (GLP), and Good Pharmacovigilance Practice (GPvP). Our established pharmaceutical quality system, led by our experienced Quality Assurance team and supported by advanced compliance technologies, is designed to ensure an ongoing state of quality control, effective risk management, and product/study quality monitoring.

Adverse events and product complaints from our patients and partners around the world are collected, monitored and reported through Ardelyx’s robust pharmacovigilance function. In addition to safety information reporting, our pharmacovigilance team oversees trainings on safety reporting requirements and processes for employees and relevant consultants, contractors and interns. We also maintain pharmacovigilance agreements with each of our commercialization partners worldwide to support the collection and communication of relevant product safety information to regulators, patients and providers in an accurate and efficient manner.





# Clinical Study Standards and Safety of Clinical Study Patients

Ardelyx clinical study standards are based in the lived experiences of our patients. We recruit participants who represent those most affected by the diseases we seek to treat to ensure an authentic understanding of treatment effectiveness and safety concerns across relevant populations. In addition, we are committed to ensuring that participants in our clinical trials represent the diverse demographic make-up of the real-world patient population, an effort that has recently seen increased focus by the U.S. Food and Drug Administration (FDA).

## Demographic Representation in Ardelyx Clinical Trials

Demographic	CKD on Dialysis Program <sup>1</sup> XPHOZAH® (N = 1259)	T3MPO Program <sup>2</sup> IBSRELA® (N = 2081)
Race (%)		
White	48.0	67.0
Black	44.6	28.7
Ethnicity (%)		
Hispanic	26.5	27.4
Gender (%)		
Male	62.0	16.9
Female	38.0	83.0

1 = CKD Safety Analysis Set  
2 = Core Safety Set



We partner with third parties, including contract research organizations (CROs), investigators and clinical study sites to conduct our clinical and preclinical studies. We require our CROs and other third parties to follow Good Clinical Practices (GCPs) and all other applicable regulations and laws wherever the clinical study is being performed, in addition to any study-specific protocols. We have developed a portfolio of standard operating procedures (SOPs) governing clinical conduct including but not limited to patient safety, investigator site qualification and selection, site monitoring and clinical project management.

In addition, we take an active role to ensure that our CROs are meeting project specifications and GCP requirements. This includes participation in regular meetings and review and execution of study documents and plans. We work to ensure qualified monitors are appointed and a clinical monitoring plan is developed for each clinical study to help conduct and document clinical study site initiation, monitoring and close-out activities. When choosing sites for our studies, we perform site qualification visits and select sites from different parts of the country to ensure an appropriately diverse patient population is enrolled. A select number of clinical sites are also audited by our Clinical Quality Assurance group to ensure compliance with each applicable protocol, GCPs, SOPs and Regulatory requirements.





### The Ardelyx Patient Advisory Council

Incorporating the voices of patients is critical to ensure we discover, develop and deliver innovative therapies that are meaningful to patients and Ardelyx. The Ardelyx Patient Advisory Council (PAC) provides key insights into our programs and helps elevate the voices of patients living with chronic kidney disease. Recently, the PAC and the National Kidney Foundation collaborated on a survey to understand the perspectives of patients on dialysis. The survey included over 475 patients and revealed that 89% of patients found that it takes effort to manage their phosphorus levels and 92% of patients noted a need for a better way to manage phosphorus levels.



## Patient Advocacy and Corporate Giving

### Patients

We seek to foster relationships with patient advocacy organizations, individual patients and caregivers in ways that are collaborative, transparent and respectful of patient privacy, autonomy and independence. To ensure that our programs reflect patient needs, our approach starts with engaging patients and patient advocates at the early clinical research stages, leveraging their experiences to educate our staff, seeking their advice in commercial development and beyond.

### Broader Community

As part of the Ardelyx commitment to the medical and patient community, we support independent medical education (IME) for professionals and independent educational programs for patients and caregivers. In 2022, we donated more than \$2 million to support independent educational programs.

Ardelyx may also provide financial support for qualified community or healthcare-related charitable organizations for a bona fide philanthropic purpose to promote the public good in line with Ardelyx funding priorities.

We also partner with organizations that promote awareness of diseases in our therapeutic areas of focus, support the patient journey, improve the communities in which Ardelyx employees live and work, or otherwise support our corporate strategy and initiatives.







## Our Team

We believe that creating a diverse, equitable and inclusive team culture is critical to attracting and retaining the top talent necessary to deliver on our mission and drive our long-term success.

We are investing in a work environment where our employees can feel inspired to deliver their best work every day. Grounded in our core values — Fearless, Dedicated, Inclusive, Passionate — our efforts are focused on creating a collaborative environment where everyone feels respected and valued, and can contribute to their fullest potential. As of December 31, 2022, we had approximately 133 full-time employees, 43 of whom were engaged directly in development and manufacturing, and 90 in marketing, sales and administrative activities. Our colleagues can be found at facilities in Waltham, MA, Fremont, CA and Milwaukee, WI, and working remotely nationwide.





# Training and Development

Our culture emphasizes passion, teamwork and high performance to create value. We employ a leadership approach that empowers teams to effectively engage, educate and deliver differentiated solutions. We believe the best decisions depend on having the right people and empowering them to act.

We place a special focus on developing leaders and managers. Recognizing that development needs differ between a new manager and a seasoned leader, we ask each employee to set individual performance goals and check in regularly with their manager. We gather cross-functional feedback to aid in year-end performance and compensation discussions. Investing in the growth and development of our employees through various training programs helps build and strengthen our employees' leadership and professional skills and insures a strong future for both our employees and the organization.



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*We have an opportunity to make a difference for patients who need options by developing treatments that offer a new approach. The work I do is really for patients and I am given the tools and guidance to pursue our mission.*

— Kimia Keshtbod, Manager of Corporate Communications



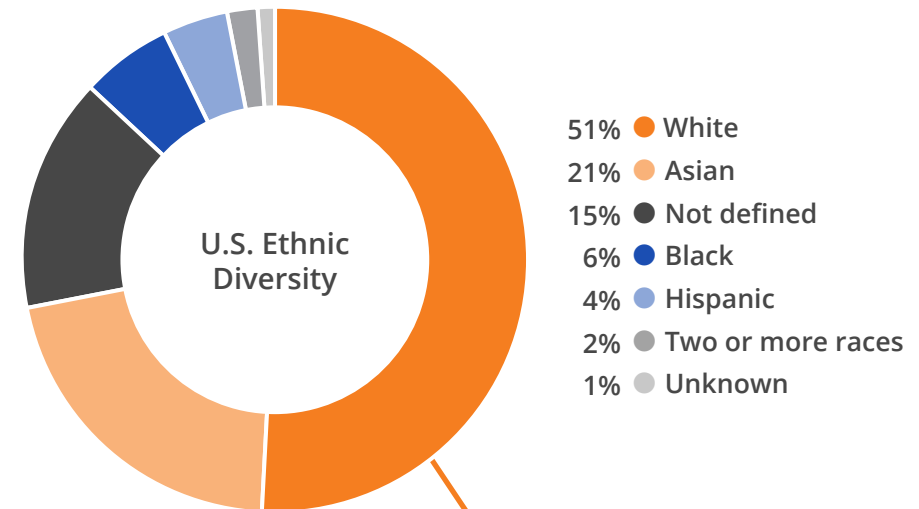




# Diversity, Equity and Inclusion

Our culture is supported by an unwavering commitment to inclusion and diversity. As of December 31, 2022, approximately 56% of our workforce was female; 43% of our executive leadership team was female and 20% of our employees in managerial roles were female. In addition, minorities represented approximately 38% of our workforce, of which 17% of our employees in managerial roles were minorities. We strive to foster a culture where mutual respect, inclusive behavior and dignity are core to our individual expectations.

We believe that our success will be significantly impacted by our ability to create and maintain a safe inclusive environment where everyone is empowered to do their best work — regardless of race, color, national origin, religion, sex, sexual orientation, gender identity and expression, age or disability. We are united by our desire to serve our patients, and we are proud financial sponsors of the California Life Sciences Association Racial and Social Equity Initiative, which aims to help close the gaps in inequity and create a more diverse industry. With significant support from Ardelyx and other engaged stakeholders, the Social Equity Initiative is a first step in a unified effort for the life sciences industry in California to do more for the under-served and under-represented, focusing on the most critical need to address the inequality for Black, Hispanic, Native American and Pacific Islander populations in California.





## Employee Health, Safety and Wellness

We understand that our employees are our greatest asset and we strive to prioritize health and well-being among our colleagues and their families. We want to be an organization that provides innovative solutions for organizational structures, workplace policies and total rewards, which engage and motivate employees. For more information about our current benefits and company culture, please view the careers page located on the Ardelyx website at [ardelyx.com/join-us/](https://ardelyx.com/join-us/).

We are committed to helping protect our employees' physical safety and providing an environment that prioritizes health and mental well-being for everyone in the Ardelyx community. All employees complete workplace respect training (anti-harassment and anti-discrimination) at the time of hire and thereafter in accordance with applicable laws and guidelines.

In addition, a comprehensive emergency action plan is in place for our Fremont, CA and Waltham, MA locations which establishes the policies and procedures for emergency preparedness, prevention, response and recovery.

## COVID-19 Response: Employees

Our long-standing prioritization of employee health, safety and wellness took on particular significance in light of COVID-19. In response to the pandemic, we implemented significant changes that we determined were in the best interest of our employees, as well as the communities in which we operate. This included having the vast majority of our employees work from home. We have since reopened our facilities and are currently inviting employees to return to our offices in the manner in which they are comfortable. We will continue to monitor infection rates and severity of disease in those communities in which our facilities are located and will continue to adapt and align our policies to stay responsive to the health, safety and wellness needs of our employees and the needs of our business.







# Caring for our Communities and the Environment

At Ardelyx, we promote environmental stewardship by integrating sustainable practices and initiatives into our business operations, creating long term value for our stakeholders. Our efforts are inspired by the communities we serve today and driven by the communities we envision in the future.

When our Fremont lab recently closed, the shutdown created several challenges including how to dispose of excess lab equipment and supplies. Cindy Wan, Director of Facilities and Operations, was up to the task. Knowing that she hoped to repurpose and donate the excess lab equipment and supplies, Cindy contacted Bio-Link Depot and the Aspiring Scholars Directed Research Program (ASDRP), both California non-profit organizations focused on STEM education and research. Bio-Link empowers educators to engage students in hands-on STEM experiences with donated scientific equipment and supplies. ASDRP, together with its consortium of highly skilled scientists, engineers and researchers, mentors high school students — budding

scientists in 9th through 12th grade — who come from every corner of the greater Bay Area in California and across the United States.

Sindy's desire to provide much needed support to underfunded and underrepresented STEM students, teachers and educational institutions was a success on all fronts. Ardelyx delivered eleven pallets of lab supplies to Bio-Link, and provided ASDRP with six truckloads of supplies and lab equipment, helping both organizations advance their missions and supporting the next generation of scientists. In addition, Ardelyx prevented several tons of supplies and equipment from going in California's landfills and saved thousands of dollars by avoiding hazardous waste disposal costs. With the Ardelyx-donated lab equipment, chemicals and supplies, these investigators and student researchers will be able to conduct experiments that hope to impact fields ranging from cancer biology, drug discovery and computer-guided drug design to radioastronomy, machine learning, psychology and urban sustainability.

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*I have always believed that STEM education should be accessible to all who want to pursue it. Working with Bio-Link and ASDRP, we are striving to make a difference in our communities with our contributions and employee activism.* — Cindy Wan, Director of Facilities and Operations





## Environmental Management

We are committed to promoting environmental stewardship across our operations and we recognize that we play a part in contributing to the health and safety of our communities.

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*At Ardelyx, we have acted on opportunities that reinforce our collective commitment to invest in our people and the communities we serve to build a more equitable and sustainable society.*

— Justin Renz, Chief Financial and Operations Officer







# Environmental, Health and Safety

As part of our sustainability strategy, we seek to harness the collective power of our organization and each employee to limit our carbon footprint:

- We use environmentally sensitive and LEED compliant building materials in our corporate facilities
- We offer flexible working arrangements to reduce traffic congestion and further reduce our carbon footprint
- We offer a commuter program as part of our benefit package
- We have installed electric vehicle charging stations to be available to our employees at our corporate facilities

We aim to continually improve our sustainability practices, such as reducing waste, increasing energy efficiency using energy efficient lighting, environmentally friendly cleaning products and compostable and recyclable materials in our offices, encouraging and supporting recycling, and establishing partnerships with office supply vendors committed to sustainability efforts.







## Supply Chain

In 2022, Ardelyx officially became a commercial organization with the launch of its first product, IBSRELA, for the treatment of IBS-C. That launch raised our levels of manufacturing GMP pharmaceutical product to a scale to support the needs of our growing patient population. It also increased our focus and attention on our supply chain.

### Manufacturing

Ardelyx partners with a number of contract manufacturing organizations (CMO) that support the various components of our manufacturing process. We partner with CMOs who share our commitment to high quality products, consistent and dependable timeline adherence, and effective resource management. To select the right partners we ensure that the manufacturing facilities have a highly favorable inspection history from a variety of global regulatory authorities; perform a technical assessment to confirm that the partner has the equipment, resources and skills necessary to execute the project as defined and within timeline parameters; and conduct a quality inspection to assess the talent, standard operating procedures in place to meet GMP requirements, and a quality system that ensures they are following their stated procedures. Our dedicated, highly experienced scientific, quality and supply chain teams work collaboratively with our CMO partners on all levels, including technical, quality and executive teams.

### Waste Disposal

Ardelyx and our partners follow all regulations and requirements related to the proper and safe disposal of our product and product components.





## Governance and Leadership

We believe good corporate governance is important to ensure that Ardelyx is managed for the long-term benefit of its stakeholders.

Our Board of Directors (the Board) has adopted a Code of Business Conduct and Ethics which applies to all officers, directors and employees; Corporate Governance Guidelines; an Insider Trading and Compliance Policy; and charters for our Audit and Compliance Committee, Compensation Committee and our Nominating and Governance Committee. Our Nominating and Governance Committee has primary Board responsibility for ESG-related issues.

These governance charters, as well as our Code of Business Conduct and Insider Trading and Compliance Policy, are reviewed and certified annually, provide a framework for the comprehensive oversight of designated risk areas by the Board and its Committee, and is an interface with our Enterprise Risk Management Program.



# Corporate Governance Guidelines

Our Board of Directors sets high standards for all employees, officers and directors. It is the duty of the Board to serve as a prudent fiduciary for shareholders and to oversee the management of our business. Our Corporate Governance Guidelines assist the Board of Directors in the exercise of its responsibility to serve in the best interest of Ardelyx and our stockholders:

- The Board's principal responsibility is to oversee the management of Ardelyx and, in doing so, must use business judgment to act in what it reasonably believes is in the best interests of Ardelyx and its shareholders
- Directors must be informed about our business and ensure effective systems are in place for periodic and timely reporting to the Board on important organizational matters
- The majority of the members of our Board are independent, and the independent directors meet regularly in executive session
- Directors have full and free access to management and, as necessary and appropriate, independent advisors
- Our Board and its committees conduct a self-evaluation periodically to determine how to function most effectively
- Our Board possesses a balance of skills and experience with an emphasis on independent oversight and continuous improvement
- Our Board is diverse in expertise and experienced in matters pertaining to our business, as well as in background and perspective, including with respect to age, gender, race, place of residence and specialized experience
- Our Board is committed to shareholder engagement with the goal of utilizing shareholder feedback to improve our governance, compensation programs and ESG acts and disclosures
- Our Board has responsibility for the oversight of our risk management processes, including risk identification, management and mitigation strategies, as well as the maturation of our Compliance Program







## Risk Management and ESG Governance

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We face a number of risks, including risks relating to our financial condition, development and commercialization activities, operations, strategic direction and intellectual property. In addition, as a life sciences company, we are highly regulated and face the risks inherent in such a heavily regulated environment. Management is responsible for the day-to-day management of risks we face, while our Board of Directors, as a whole and through committees, has responsibility for the oversight of risk management. The role of the Board in overseeing the management of our risks is conducted primarily through committees of the Board, as disclosed in the descriptions and charters for each committee.

The full Board discusses with management key risk exposures, their potential impact, and the steps to help manage them. Each Board committee is responsible for different aspects of risk management, including risks related to ESG. The Audit and Compliance Committee has a special responsibility to oversee the guidelines and policies that govern the process by which the exposure to risk is managed by Ardelyx management. The charter of the Nominating and Governance Committee provides that the committee periodically review and provide oversight with respect to our business strategy, initiatives and policies concerning corporate social responsibility, including environmental, social and governance matters.

## Board Independence and Diversity

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In evaluating proposed director candidates, we consider factors such as character, integrity, judgment, diversity, independence, skills, education, expertise, business acumen, business experience, length of service, understanding of our business and industry, conflicts of interest and other commitments. The overall diversity of our Board is an important consideration in the director nomination and selection process.

Our Nominating and Governance Committee assesses diversity in connection with the annual nomination process, as well as in new director searches. As we pursue Board recruitment efforts, our Nominating and Governance Committee will continue to seek candidates who can contribute to the diversity of views and perspectives of the Board in accordance with the Committee's policies for director candidates. Among our current nine board members, two self-identify as women and demographic diverse.



# Business Ethics and Compliance

We are committed to conducting our business, including interactions with the healthcare community, with high integrity and in full conformance with the law. Our Code of Business Conduct and Ethics represent a summary of our commitment to ethics and compliance principles that guide our operations and activities and set forth our basic principles, values and framework for action. Our compliance program addresses among other things:

- Compliance leadership, responsibility and oversight
- Risk assessment
- Third party management
- Policies and procedures
- Education and training
- Internal communication and reporting
- Auditing and monitoring
- Investigations and discipline

Our compliance program addresses each of the elements outlined in the U.S. Department of Health and Human Services' Office of the Inspector General Compliance Program Guidance for Pharmaceutical Manufacturers (OIG Guidance) and includes policies consistent with the PhRMA Code on Interactions with Healthcare Professionals (PhRMA Code). As the OIG Guidance envisions, our compliance program is designed to address the company's particular business and compliance risks, and to be scaled to its size and resources, market position and other unique aspects of our company. We are committed to the regular review, assessment and development of our compliance program and to address the evolving regulatory and business environment.

Our comprehensive policies, procedures and training programs help our employees and contingent workers comply with applicable laws, regulations and industry codes, as well as the Company's internal standards and expectations for responsible conduct. Our Code of Business Conduct and Ethics and related policies list comprehensive ethical standards for decisions and actions.

Mandatory compliance training is conducted every year. All new employees are assigned and required to complete compliance and other relevant required training. In our policies, we comprehensively address healthcare fraud and abuse, as well as anti-corruption and antibribery, following the U.S. Foreign Corrupt Practices Act, the UK Bribery Act 2010, and other applicable local anti-bribery and anti-corruption laws and regulations. Similarly, we value transparency as a key component of building trust with all those engaged with our business and comply with multiple regulatory reporting requirements in different jurisdictions.

Our Chief Compliance Officer serves as the focal point for general compliance activities under the Code of Business Conduct and Ethics and for healthcare law compliance matters and promotes an open-door policy for our employees to seek guidance on compliance issues or report suspected non-compliance. Our Chief Compliance Officer reports on general compliance matters and the status of the compliance program at periodic meetings with our CEO and Board.





# Reporting Suspected Misconduct

Ardelyx maintains an “open door” environment in which employees, contractors, vendors or other whistleblowers are encouraged to speak up and raise questions about conduct that they know, or suspect, may be inappropriate, without fear of retaliation. Confidential reporting is easy — any person can call our hotline at 877-441-1591 to submit a complaint or go online at [www.openboard.info/ARDX](http://www.openboard.info/ARDX) to use an independent secure web form for an anonymous question, report or complaint. Employees are also trained during new hire onboarding, and encouraged regularly, to speak with their managers or with the Chief Compliance Officer or General Counsel if they have concerns and would like to speak face-to-face.







## Ethical Marketing

The Ardelyx policy on promotional interactions with healthcare professionals aims to ensure that these activities meet our ethical standards and fulfill our legal and regulatory responsibilities. Members of the Commercial team and all personnel engaged in external communications receive comprehensive training on these policies and are required to demonstrate overall comprehension as part of the training on a regular basis.

It is our policy that all labeling, advertising and promotional materials, and all promotional presentations related to Ardelyx products, comply with the FDC Act, FDA regulations and other applicable federal, state, local and country-specific laws. All such materials are carefully reviewed with the goal of ensuring compliance and medical and scientific accuracy by a multi-disciplinary review committee, including members from the Medical, Legal and Regulatory Affairs & Quality Assurance departments. Our employees are strictly prohibited from engaging in off-label promotion to healthcare professionals, and our policy requires that we will not engage in the promotion of a medicine, or new use of a medicine, prior to its approval by the FDA or the applicable regulatory authority. If a member of our Commercial team receives an unsolicited request for information about an unapproved use or information that is inconsistent with the label, our policy requires that the question is referred to our Chief Regulatory Affairs & Quality Assurance Officer using approved medical information request forms, and that the healthcare professional is directed to call our medical information line. Commercial employees are not permitted to answer questions about unapproved uses.



# Information Security

Our cybersecurity mission is to enable safe and secure ways to do business by protecting Ardelyx information systems, assets and data. Our goal is to build and maintain a sustainable and flexible cybersecurity program that reduces risk, while enabling the business to run effectively.

We conduct periodic assessments of our assets to evaluate the effectiveness of applicable security controls that are implemented to help protect endpoints and mobile devices from malware and information leakage. To help ensure the availability of business-critical technology resources during adverse conditions, we also manage and maintain business continuity and disaster recovery (business resilience) capabilities. Ardelyx has an ongoing engagement with a cybersecurity firm who helps guide the company's cybersecurity program and governance strategies. This firm is consistently assessing our cybersecurity approach and adjusting to meet our growing needs. The results of these assessments are reported to the Board as part of the periodic cybersecurity update.

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***Our goal is to build and maintain a sustainable and flexible cybersecurity program that reduces risk, while enabling the business to run effectively.***

— Justin Lawrence, Director, IT Infrastructure, Support Services and Cybersecurity



## Personal Information Data Privacy

We contractually require all ArdelyxAssist patient hub providers, as well as pharmacies and CROs, to protect patient information.

We also implement technical and organizational security safeguards designed to help protect against inappropriate disclosure, misuse or unauthorized access to personal information in Ardelyx's possession or control. We train each new employee on the importance of protecting personal information, permitted and appropriate uses of personal information, and how to recognize and address inadvertent access to personal information. Opt-in language on patient-facing websites and materials is designed to describe storage and use of patient data consistent with applicable privacy laws.

For more information, please review our Privacy Policy. We are committed to compliance with all applicable privacy laws, including the Health Insurance Portability and Accountability Act and state privacy laws in the U.S. that address the protection of personal information, including protected health information or individually identifiable health information.





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