What is NAVEX EthicsPoint and why has Insmed contracted with them?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX that enables management and employees to work together to address fraud, abuse, and other misconduct in the workplace while cultivating a positive work environment. EthicsPoint's principal responsibilities are to:

- Provide confidential telephone and web-based options for employees and others to report ethics and compliance concerns
- Protect the identity of reporters who wish to remain anonymous, where allowed by local law
- Transmit information about the concern to Insmed so the company can conduct an appropriate investigation
- Allow a reporter to anonymously communicate with Insmed investigators by serving as an
 intermediary which can relay follow-up questions and answers, as well as information about
 the resolution of the case.

What types of situations should I report?

Insmed is powered by Integrity. You should report any potential violations of laws, industry codes, or Insmed policies and procedures including Insmed's Code of Conduct.

What if this is an emergency?

If you require emergency assistance, including for an immediate threat of physical harm or damage to property, please contact your local emergency services.

Should I report my concern to my manager instead of using the Hotline?

At Insmed, you have multiple resources available for raising misconduct, including:

- Your supervisor or other manager (including managers at the highest levels of the company)
- Human Resources
- Legal
- Global Compliance
- Hotline

We encourage you to bring any concerns forward to your direct manager or other member of our team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner or wish to remain anonymous. It is for such circumstances that the Hotline is available. In all cases, we would rather you report your concern through one of these resources than keep the information to yourself.

May I make a Hotline report using either the Internet or the telephone?

Yes. EthicsPoint enables you to file a report via either the telephone or the Internet. Both options allow for confidential and anonymous reporting where permitted by local law.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can <u>minimize</u> the potential negative impact on the company and our people.

I am not sure if what I have observed is a violation of company policy, but it just does not look right to me. What should I do?

Speak up! Either to an individual within Insmed or via this Hotline. We would rather you report a situation that turns out to be harmless than let possible misconduct go unchecked.

Will I face retaliation for reporting?

Insmed strictly prohibits retaliation against any person for reporting suspected misconduct in good faith. Reporting in "good faith" means that a report was made with the honest belief that misconduct has or will occur based on the information known at the time. Any act of retaliation should be reported so it can be investigated and result in the appropriate disciplinary action.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. NAVEX makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

Can I report anonymously through the Hotline? How do I know that my identify will truly be anonymous?

Yes, you may make an anonymous report wherever allowed by local law. Anonymous reports can be made by both telephone and the Internet.

The EthicsPoint system has controls in place to protect your anonymity. If you choose to remain anonymous, you will NOT be asked to provide any identifiable information, such as your name, department, gender, contact information, etc. NAVEX does not generate or maintain any internal connection logs with IP addresses, and does not track incoming phone numbers, so no information linking your device or phone to EthicsPoint is available.

What if my boss or other managers are involved in a violation? Won't they get the report?

The EthicsPoint system and report distribution ensure that implicated parties are not notified or granted access to reports in which they have been named.

How can I monitor progress on my report? What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

What if I lose my Report Key or forget the Password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.