

## OUR COMPREHENSIVE CORPORATE COMPLIANCE PROGRAM



We, ImmunoGen, maintain a comprehensive corporate compliance program (Program) as part of our commitment to conducting business in compliance with all laws and regulations that govern our business activities. Our Program is consistent with the Compliance Program Guidance for Pharmaceutical Manufacturers published in 2003 by the U.S. Department of Health and Human Services, Office of Inspector General (OIG Guidance).

The key elements of our Program are described below.

### I. GOVERNANCE AND OVERSIGHT

We have designated a Chief Compliance Officer who is charged with the overall responsibility for managing and administering the Program. The Chief Compliance Officer reports to the Chief Legal Officer and makes reports to the Audit Committee of the Board of Directors on a regular basis. We have also appointed a Corporate Compliance Committee comprised of various business and assurance functional leaders to assist the Chief Compliance Officer in advancing the Program's strategy and plans.

### II. WRITTEN STANDARDS

We have established, and continue to develop and improve, written policies, standards of practice, and procedures that address potential risk areas identified in the OIG Guidance. We are committed to implementing policies and standards of practice that are consistent with the provisions of the Code on Interactions with Healthcare Professionals created by the Pharmaceutical Research and Manufacturers of America, and last revised in 2022. Our corporate compliance policies are communicated to all relevant employees.

In compliance with the California Health and Safety Code § 119402, we have established an annual, aggregate dollar limit of \$3,000 on gifts and other items of value provided to healthcare professionals. The limit is not a goal or expected average cost of gifts and other items of value. The amount spent with healthcare professionals is substantially less than the maximum amount. The limit includes the value of legitimate educational items and meals provided in connection with business and educational discussions or presentations. In accordance with California law, this limit does not include: i) the value of drug samples that are intended for free distribution to patients, and ii) payments associated with legitimate professional services provided by such healthcare professionals. ImmunoGen has established controls and processes to track and monitor compliance with this annual spending limit.

### III. TRAINING AND EDUCATION

Effective education is essential to our Program. We host periodic sessions and deliver formal training to our employees, covering laws, policies, standards, and processes that are applicable to their job function and responsibilities.

### IV. LINES OF COMMUNICATION AND REPORTING

We support an open and honest atmosphere where potential problems and concerns are raised and addressed promptly and fairly. Employees are encouraged to speak up at any time they have questions. Our Code of Corporate Conduct and policies establish requirements for employees to report any information or knowledge they have regarding the existence of any suspected violation of laws, our Code of Corporate Conduct, or our policies. Reports can also be made anonymously. We enforce a strict non-retaliation policy for reporting issues in good faith internally and to regulatory or law enforcement agencies.

## **V. RISK MANAGEMENT**

We regularly monitor business activities to assess compliance with healthcare laws and corporate compliance policies. The subject, nature, extent, and frequency of our reviews may vary based on internal and external factors to help ensure that significant risks addressed by our Program are appropriately focused on. Identified potential or existing areas of concern are addressed through coaching, re-training, the development of guidance materials, updates to relevant policies and procedures, or other actions that are appropriate and necessary.

## **VI. DISCIPLINARY GUIDELINES**

We recognize that even a comprehensive Program may not prevent all violations. Therefore, our Program requires us to respond promptly to potential violations of law or policy and take disciplinary action, up to and including termination of employment, when warranted.

## **VII. ISSUE RESOLUTION AND CORRECTIVE ACTIONS**

Our employees are accountable for taking corrective action to address failures and share lessons learned to allow ImmunoGen to improve. We are committed to taking prompt and consistent action in response to non-compliant situations. Corporate Compliance will work cross-functionally to ensure corrective action plans are implemented to address issues related to healthcare compliance.

## **VIII. ANNUAL DECLARATION OF COMPLIANCE**

ImmunoGen declares that, to the best of its knowledge and based on a good faith understanding of the requirements of California SB 1765 (Health and Safety Code sections 119400-119402), it is in compliance with such requirements.

To obtain a copy of ImmunoGen's Comprehensive Compliance Program description and annual declaration, please call (781) 895 0275 or email [ethics@immunogen.com](mailto:ethics@immunogen.com).

Owner: Chief Compliance Officer  
Year: 2023