



Global Blood Therapeutics Healthcare Compliance Program

Global Blood Therapeutics, Inc. (“GBT” or the “Company”) is committed to doing business with the highest standards of ethics and integrity and complying with all applicable laws, regulations, ordinances, and industry standards, including in connection with potential and actual commercialization of the Company’s products (“Compliance”).

GBT’s Healthcare Compliance Program (“Compliance Program”) is consistent with the seven elements of an effective compliance program as prescribed by the 2003 Department of Health and Human Services (“HHS”) Office of Inspector General (“OIG”) Compliance Program Guidance for Pharmaceutical Manufacturers. GBT’s Compliance Program encompasses the following elements:

1. Designating a Compliance Officer and Compliance Committee – GBT has designated a Chief Compliance Officer (CCO) and established a cross-functional Compliance Committee chaired by the CCO and consisting of members of GBT’s senior management team to provide oversight of GBT’s Compliance Program;
2. Implementing Written Policies and Procedures – GBT has developed and implemented its written Code of Business Conduct and Ethics (“Code of Conduct”). GBT has also developed and will continue to develop its Healthcare Compliance Policy Handbook (“HCC Handbook”) and Healthcare Compliance Operational Guidelines (“HCC Guidelines”). For purposes of complying with the California Health and Safety Code 119402, GBT has established a maximum annual aggregate dollar limit of \$2,000 for certain promotional materials or activities provided to healthcare professionals. The annual dollar limit is a cap, and typically the amount provided to healthcare professionals will be substantially less than the established annual limit;
3. Conducting Effective Training and Education – GBT has developed and implemented and will continue to develop and implement regular, effective, and appropriate Compliance Program training for all relevant GBT personnel;
4. Developing Effective Lines of Communication – GBT has established effective lines of communications including but not limited to: (a) its Compliance Program mailbox at compliance@gbt.com and (b) its Ethos Helpline which has been established for GBT personnel to anonymously submit questions or concerns by phone at **844-527-2814** or online at www.gbthelpline.ethicspoint.com. As documented in Company policies such as the Code of Conduct and the HCC Handbook, the Company expressly forbids any retaliation against any officer or employee who, acting in good faith on the basis of a reasonable belief, reports suspected misconduct. Any person who participates in any such retaliation is subject to disciplinary action, up to and including termination;
5. Conducting Internal Monitoring and Auditing – Through its Compliance Program, GBT conducts and will continue to conduct regular internal monitoring and auditing



- activities including regarding its interactions with healthcare professionals (HCPs) and healthcare organizations (HCOs). GBT's Compliance Program monitoring and auditing activities reflect the Company's ongoing annual risk assessment analyses of internal and external Company risk areas;
6. Enforcing Standards Through Well Publicized Disciplinary Guidelines – Through the company's Code of Conduct, GBT has established its expectations of all GBT personnel to adhere to all applicable laws, regulations, local ordinances, industry standards as well as the requirements of the Code of Conduct, company policies such as the HCC Handbook, and procedures such as HCC Guidelines. The Code of Conduct and other policies and procedures further outline the potential consequences for GBT personnel who violate such laws, regulations, ordinances, industry standards, company policy, procedures, and/or operational guidelines. Potential consequences may include disciplinary action, up to and including termination.
 7. Responding Promptly to Detected Problems and Undertaking Corrective Action – GBT's Compliance Program includes clear and defined HCC Guidelines for promptly responding to and investigating allegations of potential GBT personnel violations of laws, regulations, policies, procedures, and/or operational guidelines and for implementing corrective actions to address substantiated violations and prevent future violations.

Global Blood Therapeutics Annual Declaration of Compliance

Global Blood Therapeutics, Inc. declares, to the best of its knowledge and based upon a good faith understanding of the applicable statutory requirements, that it has established a Comprehensive Compliance Program that encompasses the Compliance Program requirements stated in California Health & Safety Code §§ 119400-119402.

As of November 22, 2019, to the best of its knowledge, and based on a good faith belief, Global Blood Therapeutics, Inc. is in compliance with its Compliance Program and the requirements of California Health & Safety Code §§ 119400-119402.

As a result of the continuous evolution of the pharmaceutical industry regulatory environment, Global Blood Therapeutics, Inc. is committed to assessing the overall effectiveness of its Compliance Program, and, as part of its assessment, may update components of the Compliance Program to enhance its effectiveness.

Copies of the Global Blood Therapeutics, Inc. Compliance Program summary and declaration may be obtained by contacting the Compliance Department or the Chief Compliance Officer at compliance@gbt.com.