



Code of Business Conduct and Ethics





CODE OF BUSINESS CONDUCT AND ETHICS

Leadership Message

A message from the CEO:

You will find attached hereto our Code of Business Conduct and Ethics (the “Code”). Our Code is a reaffirmation of our commitment to conducting our business ethically and to observing applicable laws rules and regulations.



Global Blood Therapeutics, Inc. ’s reputation and continued success is dependent upon the conduct of GBT Personnel. Each GBT Personnel as a custodian of our good name, has a personal responsibility to ensure that his or her conduct protects and promotes both the letter of the Code and its spirit of ethical conduct. Your adherence to these ethical principles is fundamental to our future success.

The Code cannot provide definitive answers to all questions. Accordingly, we expect each GBT Personnel to exercise reasonable judgment to determine whether a course of action is consistent with our ethical standards and to seek guidance when appropriate. An employee’s supervisor will often be the person who can provide an employee with thoughtful, practical guidance in day-to-day duties. We have also designated our Chief Legal Officer as our Compliance Officer responsible for providing guidance and interpretation on matters related to the Code , so you should feel free to ask questions or seek guidance from the Compliance Officer.

Please read the Code carefully. If you have any questions concerning the Code, please speak with your supervisor or the Compliance Officer. Once you have read the Code and understand it, please sign the enclosed acknowledgment and return it to the Compliance Officer. You may also be asked periodically in succeeding years to confirm in writing that you have complied with the Code.

Thank you,

*Ted W. Love, M.D.
President and Chief Executive Officer*

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GBT Helpline:
www.gbthelpline.ethicspoint.com
1-844-527-2814
compliance@gbt.com

Why it Matters

The Board of Directors (the “Board”) of Global Blood Therapeutics, Inc. (collectively with its subsidiaries and affiliates, the “Company”) established this Code of Business Conduct and Ethics (this “Code”) to aid its directors, officers, employees, and contractors (collectively referred to as “GBT Personnel”) in making ethical and legal decisions when conducting the Company’s business and performing their day-to-day duties.

The Board or a committee of the Board is responsible for administering the Code. The Board has delegated day-to-day responsibility for administering and interpreting the Code to the Compliance Officer. Our Chief Legal Officer has been designated the Company’s Compliance Officer under this Code. As used throughout the Code, all references to the Compliance Officer shall include any designee.

The Company expects GBT Personnel to exercise reasonable judgment when conducting the Company’s business. The Company encourages GBT Personnel to refer to this Code frequently to ensure that they are acting within both the letter and the spirit of this Code. The Company also understands that this Code will not contain the answer to every situation you may encounter or every concern you may have about conducting the Company’s business ethically and legally. In these situations, or if you otherwise have questions or concerns about this Code, the Company encourages each officer and employee to speak with his or her supervisor (if applicable) or, if you are uncomfortable doing that, with the Compliance Officer under this Code.

Contents of this Code

This Code has two sections which follow this Introduction. The first section, “***Standards of Conduct***” contains the actual guidelines that GBT Personnel are expected to adhere to in the conduct of the Company’s business. The second section, “***Compliance Procedures***” contains specific information about how this Code functions including who administers this Code, who can provide guidance under this Code and how violations may be reported, investigated, and penalized or otherwise subject to disciplinary or remedial action. This section also contains a discussion about waivers of and amendments to this Code.

A Note About Other Obligations

GBT Personnel generally have other legal and contractual obligations to the Company. This Code is not intended to reduce or limit the other obligations that you may have to the Company. Instead, the standards in this Code should be viewed as the *minimum standards* that the Company expects from GBT Personnel when conducting the Company’s business.

Standards of Conduct

Conflicts of Interest

The Company recognizes and respects the right of its GBT Personnel to engage in outside activities which they may deem proper and desirable, provided that these activities do not impair or interfere with the performance of their duties to the Company or their ability to act in the Company's best interests. In most, if not all, cases this will mean that our GBT Personnel must avoid situations that present a potential or actual conflict between their own interests and the Company's interests.

A "conflict of interest" occurs when GBT Personnel's personal or business interest interferes with the Company's interests. Conflicts of interest may arise in many situations. For example, conflicts of interest can arise when GBT Personnel takes an action or has an outside interest, responsibility or obligation that may make it difficult for him or her to perform the responsibilities of his or her position objectively and/or effectively in the Company's best interests. Conflicts of interest may also occur when GBT Personnel or their immediate family member receives some personal benefit (whether improper or not) as a result of the GBT Personnel's position with the Company. Each individual's situation is different and in evaluating his or her own situation, a GBT Personnel will have to consider many factors.

Any material transaction or relationship that reasonably could be expected to give rise to a conflict of interest should be reported promptly to the Compliance Officer. The Compliance Officer may notify the Board or a committee thereof as he or she deems appropriate. Actual or potential conflicts of interest involving a director or executive officer other than the Compliance Officer should be disclosed directly to the Compliance Officer. Actual or potential conflicts of interest involving the Compliance Officer should be disclosed directly to the Chief Executive Officer.

Compliance with Laws, Rules and Regulations

The Company seeks to conduct its business in compliance with applicable laws, rules, and regulations. No GBT Personnel shall engage in any unlawful activity in conducting the Company's business or in performing his or her day-to-day company duties, nor shall any GBT Personnel instruct others to do so.

Protection and Proper Use of the Company's Assets

The Company's assets include its intellectual property rights, Company equipment, physical servers, and communication facilities, among other items. Loss, theft, and misuse of the Company's assets have a direct impact on the Company's business and its financial status. GBT Personnel are expected to protect the Company's assets that are entrusted to them and to protect the Company's assets in general. GBT Personnel are also expected to take steps to ensure that the Company's assets are used only for legitimate business purposes.

Corporate Opportunities

GBT Personnel owe a duty to the Company to advance its legitimate business interests when the opportunity to do so arises. GBT Personnel are prohibited from:

- diverting to himself or herself or to others any opportunities that are discovered through the use of the Company's property or information or as a result of his or her position with the Company unless such opportunity has first been presented to, and rejected by, the Company.
- using the Company's property or information or his or her position for improper personal gain; or
- competing with the Company.

Confidentiality

Confidential information generated and gathered in the Company's business plays a vital role in the Company's business, prospects, and ability to compete. "Confidential information" includes all non-public information that might be of use to competitors or other third parties, or harmful to the Company or its customers if disclosed. GBT Personnel may not disclose or distribute the Company's confidential information, except when disclosure is authorized by the Company or required by applicable law, rule, or regulation or pursuant to an applicable legal proceeding. GBT Personnel shall use confidential information solely for legitimate company purposes. GBT Personnel must return all of the Company's confidential and/or proprietary information in their possession to the Company when they cease to be employed by or to otherwise serve the Company.

Fair Dealing

Competing vigorously, yet lawfully, with competitors and establishing advantageous, but fair, business relationships with customers and suppliers is a part of the foundation for long-term success. Unlawful and unethical conduct, which may lead to short-term gains, may damage a company's reputation and long-term business prospects, as well as subject the Company and relevant individuals to criminal and/or civil liability. Accordingly, it is the Company's policy that GBT Personnel must endeavor to deal ethically and lawfully with the Company's collaborators, customers, suppliers, competitors, and employees in all business dealings on the Company's behalf. No GBT Personnel should take unfair advantage of another person in business dealings on the Company's behalf through the abuse of privileged or confidential information or through improper manipulation, concealment, or misrepresentation of material facts.

Antitrust Compliance

It is the policy of the Company to comply with all provisions of the U.S. federal and state and foreign antitrust and unfair competition laws. These laws are designed to promote fair and vigorous competition, unrestricted by anti-competitive agreements and practices. The antitrust laws generally prohibit competitors from sharing competitively sensitive information (such as pricing) and fixing prices or other terms or conditions of sale, rigging bids, allocating customers and markets, and otherwise agreeing not to compete. To prevent even the appearance of illegality, Company GBT Personnel should not discuss (orally or in writing) any of these subjects with a competitor without first discussing with the Company's legal counsel or Compliance Officer. Violations can result in severe penalties against both the Company and individual GBT Personnel. The antitrust authorities in the U.S. and abroad actively monitor and investigate potential violations of the antitrust laws and injured private parties may sue for treble damages. It is therefore imperative that all GBT Personnel understand and fully comply with both the spirit and the letter of the antitrust laws.

Accuracy of Records

The integrity, reliability, and accuracy in all material respects of the Company's books, records and financial statements is fundamental to the Company's continued and future business success. Company business records should always be prepared accurately and reliably. No GBT Personnel may cause the Company to enter into a transaction with the intent to document or record it in a deceptive or unlawful manner. In addition, no GBT Personnel may create any false or artificial documentation or book entry for any transaction entered into by the Company. Similarly, GBT Personnel who have responsibility for accounting and financial reporting matters have a responsibility to accurately record all funds, assets, and transactions in all material respects on the Company's books and records. In addition, sometimes innocuous words can be misconstrued by third parties (such as government regulators), especially when taken out of context. In preparing records, care should be taken to avoid unnecessary comments, including exaggerated or inflammatory statements or disparaging remarks about competition, the competitive process, or competitors. Terms that overstate the Company's competitive position, such as "dominant" or "monopoly", or that suggest the Company has operated or is operating in an anticompetitive manner, should not be used.

Quality of Public Disclosures

The Company is committed to providing its stockholders with complete and accurate information about its financial condition and results of operations as required by the securities laws of the United States. It is the company's policy that the reports and documents it files with or submits to the Securities and Exchange Commission, and its earnings releases and similar public communications made by the Company, include fair, timely and understandable disclosure. GBT Personnel who are responsible for these filings and disclosures, including the Company's principal executive, financial and accounting personnel, must use reasonable judgment and perform their responsibilities honestly, ethically, and objectively in order to ensure that this disclosure policy is fulfilled. The Company's senior management are primarily responsible for monitoring the Company's public disclosure.

Political Contributions/Gifts

Business contributions to political campaigns are strictly regulated by federal, state, provincial and local law in the United States, Canada, and other jurisdictions. Accordingly, all political contributions proposed to be made with the Company's funds must be coordinated through and approved by the Compliance Officer. GBT Personnel may not, without the approval of the Compliance Officer, use any of the Company's funds for political contributions of any kind to any political candidate or holder of any national, state, provincial or local government office. GBT Personnel may make personal contributions but should not represent that he or she is making any such contribution on the Company's behalf. Similar restrictions on political contributions may apply in other countries. Specific questions should be directed to the Compliance Officer.

Bribes, Kickbacks and Other Improper Payments

The Company prohibits improper payments to, including bribery of, government officials and/or private persons, including but not limited to relatives, friends, or colleagues of a private person or of a government official. This includes hiring relatives of a government official to influence the official's decision making. An improper payment or bribe is any payment or anything of value (such as products, services, bonuses, gifts, offers of hospitality/entertainment, etc.) offered or provided to improperly influence a decision or to obtain an unfair business advantage. Since the Company may be held responsible for the actions of any third party we engage, even if we did not have actual knowledge of any corrupt behavior by third parties, the Company requires the same standards of conduct for all third parties engaged to act on behalf of the Company. Please refer to the Company's Anti-Bribery and Anti-Corruption Policy for detailed guidance regarding your responsibilities.

International Trade Controls

Many countries regulate international trade transactions, such as imports, exports, and international financial transactions. In addition, the United States prohibits any cooperation with boycotts against countries friendly to the United States or against firms that may be "blacklisted" by certain groups or countries. It is the Company's policy to comply with these laws and regulations even if it may result in the loss of business opportunities. GBT Personnel should learn and understand the extent to which U.S. and international trade controls apply to transactions conducted by the Company.

Compliance Procedures

Communication and Acknowledgement of Code

All GBT Personnel will be provided with a copy of the Code upon its adoption (or the adoption of any amendment thereto) or upon beginning service at the Company, and thereafter, may be asked to review and acknowledge receipt of the Code upon the adoption of any amendment or updates thereto or upon a periodic basis. A copy of the Code is also available to all GBT Personnel by requesting a copy from the Company's Human Resources

Department or the Compliance Officer or by accessing the Company's website at www.gbt.com.

Monitoring Compliance and Disciplinary Action

The Company's management, under the supervision of its Board or a committee thereof or, in the case of accounting, internal accounting controls, auditing or securities law matters, the Audit Committee of the Board of Directors (the "Audit Committee"), shall take reasonable steps from time to time to (i) monitor compliance with the Code, and (ii) when appropriate, impose and enforce appropriate disciplinary measures for violations of the Code.

Disciplinary measures for violations of the Code will be determined in the Company's sole discretion and may include, but are not limited to, counseling, oral or written reprimands, warnings, probation, or suspension with or without pay, demotions, reductions in salary, termination of employment or service, and restitution.

The Company's management shall periodically report to the Board or a committee thereof on these compliance efforts including, without limitation, periodic reporting of alleged violations of the Code and the actions taken with respect to any such violation.

Reporting Concerns/Receiving Advice

Be Proactive. Every GBT Personnel employee is encouraged to act proactively by asking questions, seeking guidance, and reporting suspected violations of the Code and other policies and procedures of the Company, as well as any violation or suspected violation of applicable law, rule or regulation arising in the conduct of the Company's business or occurring on the Company's property. **If any GBT Personnel believes that actions have taken place, may be taking place, or may be about to take place that violate or would violate the Code or any law, rule, or regulation applicable to the Company, he or she is obligated to bring the matter to the attention of the Company.**

Seeking Guidance. The best starting point for any GBT Personnel seeking advice on ethics-related issues or reporting potential violations of the Code will usually be his or her supervisor. However, if the conduct in question involves his or her supervisor, if the employee has reported the conduct in question to his or her supervisor and does not believe that he or she has dealt with it properly, or if the GBT Personnel does not feel that he or she can discuss the matter with his or her supervisor, they may raise the matter with the Compliance Officer.

Communication Alternatives. Any GBT Personnel may communicate with the Compliance Officer, or report potential violations of the Code, by any of the following methods, **each of which may be done anonymously as set forth under "Anonymity" below:**

- ✓ **GBT's "Ethos Helpline" online** - at www.gbthelpline.ethicspoint.com.
- ✓ **GBT's "Ethos Helpline" by phone** - **1-844-527-2814**; or
- ✓ **In writing** - addressed to Compliance Officer, Global Blood Therapeutics, Inc., 181 Oyster Point Boulevard, South San Francisco, CA 94080.

Reporting Accounting and Similar Concerns. Any concerns or questions regarding any potential violations of the Code, any company policy or procedure or applicable law, rules or regulations that involves accounting, internal accounting controls, auditing or securities law matters, or the FCPA and similar anti-bribery and anti-

corruption laws will be directed to the Audit Committee or a designee of the Audit Committee in accordance with the procedures established by the Audit Committee for the receipt, retention and treatment of complaints regarding accounting, internal accounting controls or auditing matters.

GBT Personnel may also communicate directly with the Audit Committee or its designee regarding such matters by the following methods, **each of which may be done anonymously as set forth under “Anonymity” below:**

- ✓ **GBT’s “Ethos Helpline” online** - at www.gbthelpline.ethicspoint.com.
- ✓ **GBT’s “Ethos Helpline” by phone** - **1-844-527-2814**; or
- ✓ **In writing** - addressed to Accounting Concerns, c/o Chairperson of the Audit Committee, Global Blood Therapeutics, Inc., 181 Oyster Point Boulevard, South San Francisco, CA 94080.

Cooperation. GBT Personnel are expected to cooperate with the Company in any investigation of a potential violation of the Code, any other company policy or procedure, or any applicable law, rule, or regulation.

Misuse of Reporting Channels. GBT Personnel should not use these reporting channels in bad faith or in a false or frivolous manner or to report grievances that do not involve the Code or other ethics-related issues.

Director Communications. In addition to the foregoing methods, a director may also communicate concerns or seek advice with respect to this Code by contacting the Board through its Chairperson or Lead Independent Director, or the Audit Committee through its Chairperson.

Anonymity

When reporting suspected violations of the Code, the Company prefers that GBT Personnel identify themselves to facilitate the Company’s ability to take appropriate steps to address the report, including conducting any appropriate investigation. However, the Company also recognizes that some people may feel more comfortable reporting a suspected violation anonymously.

If any GBT Personnel wishes to remain anonymous, he or she may do so, and the Company will use reasonable efforts to protect the confidentiality of the reporting person subject to applicable law, rule, or regulation or to any applicable legal proceedings. In the event the report is made anonymously, however, the Company may not have sufficient information to look into or otherwise investigate or evaluate the allegations. Accordingly, persons who make reports anonymously should provide as much detail as is reasonably necessary to permit the Company to evaluate the matter(s) set forth in the anonymous report and, if appropriate, commence and conduct an appropriate investigation.

No Retaliation

GBT has a responsibility to create an environment where GBT Personnel feel comfortable raising questions and concerns without fear of retaliation.

GBT does not tolerate retaliation against any GBT Personnel who, acting in good faith on the basis of a reasonable belief, reports suspected misconduct or who cooperates in a review or investigation. Under no circumstances shall the good faith reporting of any suspected violation serve as a basis for any retaliatory actions to be taken by the Company against any GBT Personnel making the report.

Any GBT Personnel engaging in any type of retaliatory conduct will be subject to disciplinary action, up to and including termination. If you believe someone has retaliated against you or against someone else, please raise a concern immediately. GBT Personnel who believe he/she are subject to retaliation should immediately raise a concern using the GBT Helpline or contacting the GBT Compliance Officer directly.

Waivers and Amendments

No waiver of any provisions of the Code for the benefit of a director or an executive officer (which includes without limitation, for purposes of this Code, the Company's principal executive, financial and accounting officers) shall be effective unless (i) approved by the Board or, if permitted, a committee thereof, and (ii) if applicable, such waiver is promptly disclosed to the Company's stockholders in accordance with applicable U.S. securities laws and/or the rules and regulations of the exchange or system on which the Company's shares are traded or quoted, as the case may be.

Any waivers of the Code for other employees may be made by the Compliance Officer, the Board or, if permitted, a committee thereof.

All amendments to the Code must be approved by the Board or a committee thereof and, if applicable, must be promptly disclosed to the Company's stockholders in accordance with applicable U.S. securities laws and the rules and regulations of the stock exchange or system on which the Company's shares are traded or quoted, as the case may be.

ADOPTED: July 23, 2015

EFFECTIVE: August 11, 2015

REVISED: December 15, 2017 AMENDED: December 19, 2018 AMENDED: October 16, 2019

AMENDED: December 10, 2020 EFFECTIVE: December 15, 2020

AMENDED: December 15, 2021; EFFECTIVE: January 1, 2022