



# Code of Business Conduct and Ethics

## Dear Colleague,

Ours is a business with many complex dimensions, so being alert to those situations that pose an ethical question requires an understanding of our underlying values, culture and policies. While we are always striving to deliver strong business results, how we achieve those results is as, if not more, important. Our work affects people's lives, and this immense responsibility should always be top of mind. It is for all these reasons that we must always ask ourselves, "what's the right thing to do and what's the right way to do it?"

While fundamentally we trust that Xeris employees understand the imperative to always exercise good judgment, sometimes what is right isn't always clear. This Code of Business Conduct and Ethics (the "Code") is designed to help you understand the aspects of our business where there may be an ethical dimension, and provide help in making the right decision. Of course, no code or policy can answer every question or eventuality in a business like ours, so please speak to the designated contacts below if you are in doubt as to what to do. Accordingly, we expect each employee, director and designated agent to exercise reasonable judgment to determine whether a course of action is consistent with our ethical and legal standards, and to seek guidance when appropriate. Your supervisor will often be the person who can provide you with thoughtful, practical guidance in your day-to-day duties. Brian Conner, at [compliance@xerispharma.com](mailto:compliance@xerispharma.com), is our Chief Compliance & Risk Officer, so you should feel free to ask questions or seek guidance from him.

Please read the Code carefully and ensure that you understand it. If you have any questions concerning the Code, please speak with your supervisor or the Chief Compliance & Risk Officer. Within five business days of joining Xeris, please attest that you agree to abide by the provisions of the Code. You may also be asked periodically in succeeding years to confirm in writing that you have complied with the Code.

By following the spirit of this Code and behaving in a manner consistent with our values, we will continue to earn the trust and respect of those with whom we work, and those we serve.

Sincerely,

A handwritten signature in black ink, appearing to read "John P. Shannon". The signature is fluid and cursive, with a long horizontal stroke at the end.

**John Shannon**

Chief Executive Officer

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A photograph of laboratory glassware, including Erlenmeyer flasks and test tubes, on a lab bench. The scene is lit with a cool, teal light. A pipette is visible at the top, dispensing liquid into one of the flasks. The background is blurred, showing more lab equipment.

# Our Commitment to Ethics

## Purpose and Scope

Xeris Pharmaceutical, Inc. (together with its subsidiaries, "Xeris" or the "Company") established our Code of Business Conduct and Ethics (the "Code") to serve as a guide for Xeris directors, officers, employees, and certain designated agents (collectively, "Colleagues") in making ethical and legal decisions when conducting Company business and performing their day-to-day duties.

The Xeris Board of Directors or a committee of the Board is responsible for administering the Code. The Board of Directors has delegated day-to-day responsibility for administering and interpreting the Code to a Chief Compliance & Risk Officer.

All Xeris Colleagues have a responsibility to exercise reasonable judgment when conducting Company business. We encourage Colleagues to refer to the Code frequently and act within both the letter and the spirit of the Code. The Code has been developed to provide guidance but will not contain the answer to every situation Colleagues may encounter or every potential concern about conducting Company business ethically and legally. In these situations, Colleagues should speak with their supervisor (if applicable or appropriate) or the Chief Compliance & Risk Officer.

## Compliance with Laws, Rules, and Regulations

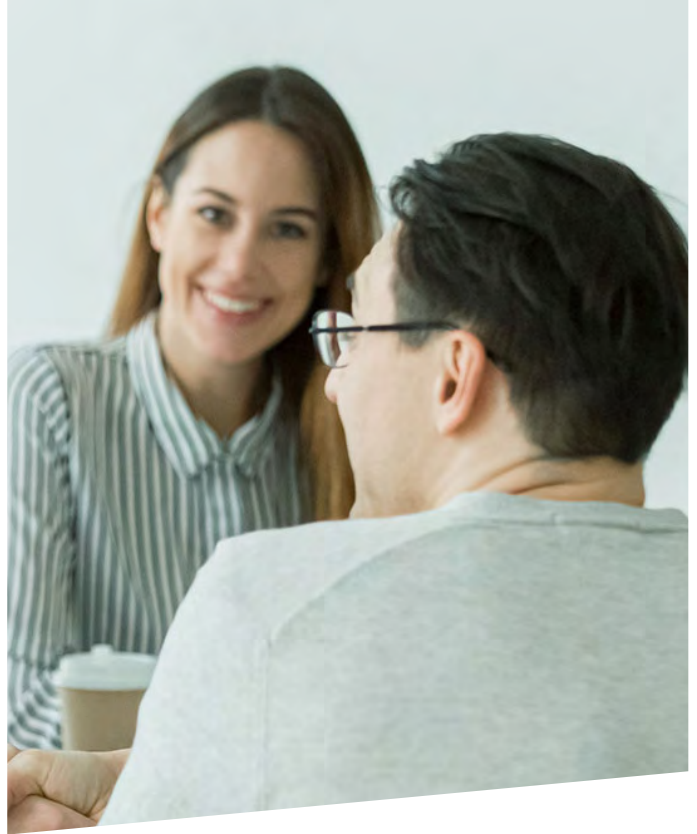
We are committed to conducting business ethically and in compliance with applicable laws, rules, and regulations. Xeris colleagues are expected to be aware of relevant laws and regulations and may not engage in any unlawful activity in conducting Company business or in performing day-to-day Company duties.

## A Note About Other Obligations

Xeris Colleagues generally have other legal and contractual obligations to the Company. The Code is not intended to reduce or limit other Company obligations. Instead, the standards in our Code should be viewed as the *minimum standards* that we expect from all Colleagues engaging in Company business.

## Contents of Our Code

Our Code has four sections. The first section, "**Our Commitment to Ethics**," describes our obligations to the laws and Company policies that govern our business activities and the resources in place to support our compliance. The second section, "**Team Expectations**," contains information about standards for ethical business conduct and a safe and respectful work environment. The third section, "**Engaging Our Customers**," describes obligations we have to customers and patients as a life sciences organization. The fourth section, "**Engaging with Our Community**," contains guidance on our interactions with the broader community, including with the public and government, and our responsibilities as corporate citizens.



## Communication of Our Code

The Company will ensure that all Xeris Colleagues can readily access the Code and will be supplied with a copy of the Code upon beginning service at the Company. It is your responsibility to thoroughly review the Code and sign an acknowledgment regarding the Code on a periodic basis. Updates to the Code will be provided from time to time.

If you need a copy of the Code, you are welcome to request it directly from the Chief Compliance & Risk Officer, or access it at the Company's website:

[www.xerispharma.com](http://www.xerispharma.com).

## Reporting Concerns

### Be Proactive

We expect all Colleagues to act proactively by asking questions, seeking guidance, and reporting actual or suspected violations of the Code and other Company policies or procedures, 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. **Colleagues have a duty to promptly report any legitimate concerns to the Company. Refer to our Whistleblower and Non-Retaliation Policy for additional information.**

### Seeking Guidance

The best starting point for a Colleague seeking advice on ethics-related issues or reporting potential violations of the Code will usually be a supervisor and/or the Chief Compliance & Risk Officer. Colleagues should report any conduct in question involving a supervisor directly to the Chief Compliance & Risk Officer or anonymously using alternative communications.

### Communication Alternatives

Colleagues may communicate with the Chief Compliance & Risk Officer through any of the following methods listed below.



#### IN WRITING

May be done anonymously, addressed to the Chief Compliance & Risk Officer by U.S. mail:

Chief Compliance & Risk Officer  
c/o Xeris Pharmaceutical, Inc.,  
1375 W. Fulton St., Suite 1300,  
Chicago, IL 60607



#### PHONE

Calling toll-free **866-693-2184**, which is the "**Ethics and Compliance Hotline**" that the Company has established for receipt of questions and reports of potential violations of the Code, or any other issue or concern. The Ethics and Compliance Hotline is managed by a third-party required to maintain the anonymity of the caller if requested.



#### EMAIL

[compliance@xerispharma.com](mailto:compliance@xerispharma.com)  
(anonymity cannot be maintained)



#### ONLINE

By submitting a report online at  
<https://report.syntrio.com/xerispharma>

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[What should I do if I'm unsure if something I observed is considered a violation?](#)





Any concerns or questions regarding potential violations of the Code, any other Company policy or procedure, or applicable law, rules or regulations involving accounting, internal accounting controls, auditing or securities law matters should be directed to the Chief Compliance & Risk Officer. Colleagues may also report such matters to the Audit Committee or a designee of the Audit Committee:

- *In writing to:* Chair of the Audit Committee, c/o Xeris Pharmaceuticals, Inc., 1375 W. Fulton St., Suite 1300, Chicago, IL 60607; or
- *By phoning:* The Ethics and Compliance Hotline and asking that the matter be forwarded to the Chairperson of the Audit Committee.

### Cooperation

Colleagues 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

Colleagues may not use these reporting channels falsely or in bad faith. Further, the Ethics and Compliance Hotline should not be used to report grievances that do not involve the Code or other ethics-related issues.

If a Colleague wishes to remain anonymous, we will make 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 a report is made anonymously, however, we may not have sufficient information to look into or investigate the allegations. Accordingly, individuals making anonymous reports should provide as much detail as possible to permit us to evaluate the matter(s) and, if appropriate, commence and conduct an appropriate investigation.

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**Will I be notified of the outcome of a report?**



## Anti-Retaliation

We do not tolerate retaliation against any Colleague who makes a good faith report of actual or suspected breaches of applicable laws, regulations, codes, the Company's Code, Company policies or procedures, or concerns of other misconduct. The Company's prohibition on retaliation against whistleblowers extends to all reports made in good faith, irrespective of whether a subsequent investigation reveals a breach. Raising concerns for the purpose of personal gain or motive such as retribution, or to further any private dispute or personal grievance is unacceptable. Any person who participates in any such retaliation may be subject to disciplinary action, up to and including termination. Please see our **Whistleblower and Non-Retaliation Policy** for additional information.



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[What does it mean to make a report in good faith?](#)



## Monitoring Compliance and Disciplinary Action

We take reasonable steps to ensure compliance with the Code through periodic monitoring activities. Compliance violations observed through periodic monitoring may result in disciplinary measures commensurate with the severity of the violation. 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.

Company management shall periodically report to the Board of Directors or a designated sub-committee on compliance activities, including periodic reporting of alleged violations of the Code and the actions taken in response.

## Waivers and Amendments

No waiver of any provisions of the Code for the benefit of a director or an executive officer (including the Company's principal executive, financial and accounting officers) will be effective unless (i) approved by the Board of Directors or designated sub-committee, and (ii) if applicable, such waiver is promptly disclosed to the Company's shareholders 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.

Any waivers of the Code for other Colleagues may be made by the Chief Compliance & Risk Officer, the Board of Directors or a designated sub-committee.

Amendments to the Code must be approved by the Board of Directors or a designated sub-committee and, if applicable, must be promptly disclosed to the Company's shareholders 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.



# Team Expectations

## Anti-Discrimination & Anti-Harassment

All Colleagues are entitled to work in an environment that is free of harassment, bullying, and discrimination, including, but not limited to sexual harassment and sexual/gender discrimination. Our expectations regarding respect apply not only in the workplace, but whenever Colleagues are representing or conducting business for the Company.

Types of disrespectful conduct that the Company does not tolerate include, for example:

- Unwelcome remarks, gestures, or physical contact.
- The display or circulation of offensive, derogatory, or sexually explicit pictures or other materials, including by email, text message, and on the Internet.
- Offensive or derogatory jokes or comments (explicit or by innuendo).
- Verbal or physical abuse or threats.

The effectiveness of maintaining a successful workplace depends on all of us working together. If you have concerns regarding respect at the workplace, you are strongly encouraged to follow the Compliance Procedures. More information regarding respectful workplace expectations and protections for reporting concerns are available in the **Employee Handbook** and the Company's **Whistleblower and Non-Retaliation Policy** for additional information.

## Diversity, Equity & Inclusion

We strive to be a place of belonging, inclusivity, and opportunity, where every individual feels empowered to contribute and has equitable access to resources and support. We are committed to providing a welcoming environment where we encourage diverse perspectives, ideas, and people. This commitment extends to every aspect of our business, including how we interact with patients, healthcare professionals, communities, and each other. We all share a responsibility to uphold a respectful and inclusive culture.

## Workplace Safety

We strive to provide a work environment that enables all Colleagues to reach their full potential. We prioritize the safety and well-being of employees and visitors by meeting or exceeding all applicable federal and state laws, including Occupational Safety and Health Administration (OSHA) standards.

We do not tolerate acts or threats of violence in any form in the workplace, at work-related functions, or in any setting that pertains to or affects the workplace. Maintaining a safe and healthy workplace is a shared responsibility. Colleagues must comply with applicable laws, regulations, and Company policies, follow safety rules and practices, and promptly report any accidents, injuries, or unsafe conditions, equipment, or practices. Together, we ensure a safe environment for everyone.

## Fair Competition

We are committed to competing fairly and lawfully based on the merits of our people, our products, and our transparent, ethical relationships with customers, suppliers, and competitors. Building long-term success requires adherence to applicable antitrust, unfair competition, and trade regulation laws in the U.S. and other countries where we operate. Colleagues must ensure that all business dealings are conducted ethically and lawfully, avoiding any practices that might unfairly limit competition, such as price-fixing, bid-rigging, or collusion.

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[What are price-fixing, bid-rigging, and collusion?](#)



## Fraud & Abuse

We maintain the highest standards of integrity and honesty in our business dealings. We expect all Colleagues to be truthful in their interactions and adhere to applicable laws designed to prevent fraud, waste, and abuse. Colleagues must avoid any actions that could be considered fraudulent, such as falsifying data, misrepresenting product information, or providing inappropriate inducements. Ethical and transparent behavior helps us preserve trust, protect patients, and uphold regulatory compliance.

## Insider Trading

When buying or selling Company shares, all directors, employees, officers, and other "insiders" should be mindful of the legal and policy limitations on trading. Colleagues must maintain the confidentiality of non-public information and adhere to applicable laws regarding insider trading. It is illegal to trade securities while in possession of material, non-public information and to disclose such information to others who may trade on the basis of the information. Our Insider Trading Policy prohibits all of our directors, officers, and employees, as well as their immediate family members, from trading securities on the basis of material, non-public information, or disclosing or passing along information to others who then trade on the basis of such information.

"Non-public" information is any information that is not yet available to the public and investors and is not widely available generally. Information is "material" if it could reasonably be expected to impact an investor's decision whether to buy, sell, or hold a security or alter the total mix of information in the marketplace. For example, information about clinical trial results, regulatory submissions or decisions, financial performance, mergers or acquisitions, or any other significant corporate developments are frequently considered material information. Violations of insider trading laws can result in severe civil and criminal penalties for both the individual and the Company. It is your responsibility to ensure that you do not violate the insider trading laws. Refer to our **Policy on Insider Trading and Disclosure** for more information.



## Bribes, Kickbacks and Other Improper Payments

Our Company does not tolerate bribery or corruption in any form, whether of a government official or private individual. All Colleagues have a responsibility to ensure that our business activities are conducted legally and consistent with our values. The damage to the reputation of companies associated with bribery or corruption, even if the event is perceived rather than actual, is immeasurable.

Many countries have laws that prohibit bribery and corruption. In the U.S., the Foreign Corrupt Practices Act (FCPA) prohibits any individual or business in or from the U.S. from authorizing, offering, or paying money or anything of value, directly or indirectly, to any foreign official or employee, political party, or candidate for public office for the purpose of obtaining or maintaining business or for any other business advantage. Violation of the FCPA could subject the Company and individuals to serious civil and criminal penalties.

The Company does not permit or condone active or passive bribes, kickbacks or other improper payments, transfers, or receipts. A "bribe" or "bribery" is the act of offering, promising, or giving a financial or other advantage to another person with the intent to induce improper performance of a business or public function. Bribes can take the form of money, gifts, loans, fees, hospitality, services, the award of a contract, or any other advantage or benefit. Colleagues may never offer, give, solicit, or receive any money or other item of value for the purpose of obtaining, retaining, or directing business or bestowing or receiving any kind of favored treatment.

Corruption comes in many forms—it includes bribery but also other behavior which has an illicit or immoral purpose. We prohibit Colleagues from engaging in corruption in any form.

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[What is the difference between an active vs. a passive bribe?](#)



[What is considered a "kickback"?](#)

Please see the Company's **Anti-Bribery and Anti-Corruption Policy** for additional information.

## Accuracy of Records

The integrity, reliability, and accuracy of Company books, records, and financial statements are fundamental to our continued and future business success. Colleagues may never enter into a transaction with the intent to document or record it in a deceptive or unlawful manner or create any false documentation for any Company transaction. Similarly, Colleagues responsible for accounting and financial reporting must accurately record all funds, assets, and transactions on Company books and records.

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### Tips for Keeping Accurate Records



## Trade Controls

We are dedicated to conducting business responsibly and in full compliance with trade laws and regulations in the U.S. and internationally, including import and export controls, sanctions, and anti-boycott laws. Colleagues must perform due diligence to ensure potential new business partners are not subject to national or international sanctions prior to conducting business.

We adhere to regulations governing controlled information and technology exchange. Prior approval is required before exporting regulated goods or sharing controlled information to ensure compliance with all applicable regulations.

## Protection and Proper Use of Company Assets

Loss, theft, and misuse of Company assets has a direct impact on our business and financial status. Colleagues have a responsibility to protect the Company assets entrusted to them and ensure that Company assets are used only for legitimate business purposes.

Company assets may include, but are not limited to:

- Physical property and facilities, such as buildings, equipment, vehicles, and tools.
- Technology, such as computers, mobile devices, software, and other IT infrastructure.
- Knowledge and intellectual property, such as employee expertise, patents, trademarks, and brand names.
- Financial assets, including Company funds, credit cards, and accounts.
- Customer, employee, and other sensitive data.

## Data Privacy

We are committed to protecting the privacy and confidentiality of all personal data, including that of patients, healthcare professionals, employees, and business partners. Colleagues must comply with applicable data privacy laws, such as GDPR, HIPAA, and other relevant regulations, and handle data responsibly to prevent unauthorized access, use, or disclosure.

We only collect, process, and store personal data for legitimate business purposes, and we take steps to ensure it is protected with appropriate security measures. Any suspected data breaches or privacy concerns must be reported immediately to the Chief Compliance & Risk Officer and/or the Head of IT.

By safeguarding personal data, we uphold trust, maintain compliance, and ensure the integrity of our operations.

## Confidentiality

Confidential information generated and gathered as part of our objectives and initiatives 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, such as third-party private personnel or financial information, non-public Company financial information, business marketing strategy, non-public contractual terms between the Company and third-parties, non-public Company technology information, non-public personnel or employee information, and competitive information and Company ideas. Colleagues must avoid talking about or sharing such information in public places when conversations could be overheard, or screens viewed by others.

Colleagues may not disclose or distribute confidential information, except when authorized by the Company, required by applicable law, rule, or regulation, or pursuant to an applicable legal proceeding. Colleagues may use confidential information solely for legitimate company purposes and must return all confidential and/or proprietary information in their possession upon separation from the Company. Any suspected theft of confidential information or intellectual property or unauthorized disclosure of, or access to, our information should be immediately reported to the Chief Compliance and Risk Officer.

All employees are required to sign a Proprietary Information and Inventions Agreement as a condition of employment. This Agreement provides more information regarding expectations surrounding protection of confidential information.

## Conflicts of Interest

We are committed to ensuring that personal interests never compromise the integrity of our business decisions or the trust of our patients, stakeholders, and partners. A conflict of interest arises when personal interests or activities interfere—or appear to interfere—with the best interests of the Company. It is our responsibility to recognize and avoid situations where personal or financial interests could compromise professional judgment.

We expect Colleagues to act in the Company's best interests at all times. This includes identifying and disclosing any potential conflicts. Examples of conflicts of interest include:

- **Financial Interests:** Holding investments in suppliers, competitors, or business partners that could influence decision-making.
- **Personal Relationships:** Hiring or supervising family members, or close personal relationships with individuals connected to business transactions.
- **External Activities:** Engaging in outside employment, consulting, or board memberships that overlap or conflict with company responsibilities.
- **Gifts or Benefits:** Accepting gifts, payments, or favors from suppliers, healthcare providers, or other business partners that could create undue influence.
- **Business Opportunities:** Gaining or diverting a business opportunity or advantage discovered through the use of Company property, information, or position.

**Each individual's circumstances are unique, requiring careful consideration of relevant factors. Any material transaction or relationship that could reasonably give rise to a conflict of interest must be reported promptly to the Chief Compliance & Risk Officer. The Chief Compliance & Risk Officer may, at their discretion, notify the Board of Directors or an appropriate committee.**

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[How do I know if a situation might be a conflict of interest?](#)





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# Engaging Our Customers

## Interactions with Healthcare Professionals and Promotional Activities

We act according to the highest standards of integrity and compliance in all our relationships with healthcare professionals (HCPs). Company representatives interact with HCPs for both promotional and non-promotional purposes.

Interactions and communications conducted on behalf of the Company must be focused on informing HCPs about our products, providing scientific and educational information, and supporting medical education.

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Who is considered an HCP?



Commercial interactions in the U.S. are regulated by federal laws such as the Anti-Kickback Statute, False Claims Act, Federal Food, Drug, and Cosmetics Act, and implementing regulations, as well as draft and final guidance documents maintained by various government agencies. We comply with applicable laws and regulations prohibiting the offering or giving of kickbacks, bribes, or other improper inducements to HCPs.

Promotional materials and communications with HCPs must be truthful, accurate, not misleading, fairly balanced, properly substantiated, scientifically rigorous, and compliant with applicable laws and regulations. Promotional materials must be reviewed and approved in writing in accordance with the established Company process. Marketing and promoting a product for an unapproved use is illegal and is prohibited. All representatives who interact with HCPs on behalf of the Company receive training on the applicable laws, regulations, industry codes and Company policies governing appropriate interactions with HCPs.

## Gifts, Meals, & Entertainment

We only provide appropriate items of value that are modest and infrequent to customers, and only if the items are incidental to a legitimate business purpose. Colleagues may never offer gifts, meals, or entertainment to improperly influence decisions, secure referrals, or gain an unfair advantage.

A business courtesy, such as a non-cash gift, may be appropriate in certain circumstances but may never be offered or accepted with the intent to compromise impartiality or integrity. Examples of acceptable courtesies include items of nominal value or occasional modest meals. Cash or cash-equivalent gifts are strictly prohibited. Colleagues may not solicit or accept gifts, loans, or other preferences from individuals or organizations doing or seeking business with the Company. Unsolicited gifts of modest value that do not influence decision-making may be accepted if:

- They are occasional and not frequent.
- They do not compromise the recipient's impartiality.
- They are not intended as bribes or payoffs.

If a gift exceeds modest value or becomes frequent, it must be reported to a supervisor and the Chief Compliance & Risk Officer for guidance. The Company may require that the gift be returned or disposed of appropriately.

Employees and directors should consult the Company's **Policy on Meals, Educational Items, Gifts and Entertainment**, or other relevant policies for further details. If in doubt about the appropriateness of any gift or courtesy, Colleagues should seek clarification from a supervisor or the Chief Compliance & Risk Officer before proceeding.



## Clinical Integrity

We are committed to maintaining the highest standards of integrity in our clinical research activities. All clinical trials must comply with applicable laws, regulations, and ethical guidelines, including Good Clinical Practice (GCP). Data collection, analysis, and reporting must be accurate, transparent, and free from manipulation.

Colleagues involved in clinical research have a responsibility to prioritize patient safety, protect patient rights, and ensure informed consent is obtained. Any concerns about unethical practices, data integrity, or regulatory compliance must be reported immediately to the Chief Compliance & Risk Officer. Upholding clinical integrity is essential to advancing science, earning trust, and improving patient outcomes.

## Drug Safety & Quality

Our Company maintains a quality-focused culture and prioritizes patient safety as a key foundation of our mission. We implement systems and processes to ensure compliance with applicable quality regulations, codes and standards.

Everyone at the Company plays a role in upholding this commitment and shares a responsibility to report any information related to the safety, quality, or performance of our products. We have both an ethical and legal obligation to track and report any adverse events or product quality complaints tied to our products. This data is critical for providing accurate and current safety information to regulatory authorities, HCPs, and patients. The more comprehensive the data we gather, the better equipped we are to address concerns, improve our products, and fulfill our commitment to patient well-being.

Colleagues who become aware of a potential issue with one of our products must report it immediately to the Xeris Contact Center at 1-877-937-4737. Our vigilance helps us maintain the highest standards of safety, transparency, and care for the patients who rely on us.

Please see the Company's **Quality Policy** for additional information.

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[What is an Adverse Event or Adverse Experience \(AE\)?](#)





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# Engaging with Our Community

## Communications with Media

We provide accurate and consistent information to the media and the public. To ensure this, only designated corporate spokespersons may respond to media inquiries. Colleagues may not make public statements about Company matters unless they are authorized spokespersons.

Colleagues contacted by the media regarding the Company should direct the inquiry to an authorized Company spokesperson. This ensures all communications are handled appropriately and align with the Company's policies.

We expect all Colleagues to represent the Company positively, fairly, and professionally. When sharing personal views through any media platform—such as television, radio, online forums, or social media—Colleagues must make clear that these opinions are personal and not reflective of the Company's official stance.

## Political Activities

We respect Colleagues' freedom to engage in political activities in a personal capacity, provided these activities occur outside of work hours and do not involve Company resources.

Colleagues are prohibited from engaging in political activities on behalf of the Company or using Company funds, property, time, or services to support any political candidate or party unless explicitly permitted by law and approved by the Compliance Officer or the Chief Legal Officer. Xeris does not reimburse Colleagues for any expenses related to personal political activities.



### **Government Interactions/Investigations**

We cooperate fully with lawful government inspections and investigations while maintaining the highest ethical and legal standards. Colleagues who are approached by a government agency or official should immediately notify their supervisor and the Chief Legal Officer and Chief Compliance & Risk Officer. We never tamper with or destroy records, documents, or objects that may be relevant to an official proceeding. Colleagues are required to comply with any Legal Hold notices and may not obstruct or interfere with any government actions in any way.

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[What is a Legal Hold?](#)



### **Quality of Public Disclosures**

We are committed to providing our shareholders with complete, fair, and accurate information about the Company's financial condition and results of operations as required by the securities laws of the United States. It is our policy that the reports and documents we file with or submit to the Securities and Exchange Commission, and any earnings releases and similar public communications we make, include fair, timely, and understandable public disclosure. Colleagues responsible for these filings and disclosures, including the Company's principal executive and financial and accounting officers, must use reasonable judgment and perform their responsibilities honestly, ethically, and objectively to ensure fulfillment of this disclosure policy. The Disclosure Committee is primarily responsible for monitoring our public disclosure.

Please see the Company's **Corporate Communications Policies and Procedures** document for more information.

