ACADIA®

The Acadia Code of Conduct

Updated 2026

Our Purpose, Mission, & Values

Our Purpose

Be their difference

Our Mission

Turn scientific promise into meaningful innovation that makes the difference for underserved neurological and rare disease communities around the world.

Our Values

START WITH THEM

We put underserved patients first. Their needs guide every decision we make, because what matters to them, matters most to us.

LISTEN TO LEARN

We stay curious. Drawing on insights from patients, partners and each other, we take smarter, more compassionate approaches to advance care.

SEE THE PROMISE

We see potential where others don't. With bold science and a shared vision, we take on tough challenges because breakthroughs require courage.

MAKE IT HAPPEN

We go all in. We move forward together and show up with care, because people count on us.

Our Commitment to Compliance

Acadia Pharmaceuticals has an unwavering commitment to conduct business with the highest standards of ethics and compliance. We maintain a comprehensive Compliance Program, led by a dedicated Chief Compliance Officer, designed to prevent and detect violations of Company policy, applicable laws, or regulations.

Proactive and Practical

Centered on a proactive and practical approach to policies and training, and supported by a robust monitoring and auditing platform, Acadia's Compliance Program is deeply embedded in our culture and business.

Report All Concerns

We encourage employees, vendors, and stakeholders to report all potential issues. Reported concerns are thoroughly investigated. We act on all substantiated matters including pursuing disciplinary action and corrective actions to prevent future issues.

Open Door Policy

Employees are encouraged to promptly report a good faith complaint regarding any potential issues such as an accounting or auditing matter, observed unethical behavior or concerning direction from a colleague. Acadia has a strict non-retaliation policy in place.

Ethical Product Promotion

It is Acadia's policy to promote our products only in a manner consistent with FDA-approved product labeling. All promotional interactions with relevant healthcare professionals (HCPs) are focused solely on addressing educational needs by providing truthful and accurate scientific and educational information on our products or relevant disease states. The intent of our interactions with HCPs must be to benefit patients and enhance the practice of medicine.

Code of Conduct Expectations

This Code of Conduct (the "Code") reflects the business practices and principles of behavior that support our commitment to compliance. We expect every employee, officer, and director to read, understand, and follow this Code and its application to the performance of their responsibilities with the Company.

Common Sense Responsibility

The Code addresses conduct that is particularly important for properly dealing with the people and entities with whom we interact.

However, it reflects only a part of our overall commitment. It is the responsibility of each employee to apply common sense, together with their own highest personal ethical standards, in making business decisions in the absence of a stated guideline in this Code or Company policy.

Honest and Ethical Conduct

Unyielding personal integrity is the foundation of corporate integrity. Acadia promotes high standards of integrity by conducting business in an honest and ethical manner. The integrity and reputation of the Company depends on the honesty, fairness, and integrity brought to the job by each person associated with the company.

Every employee must use common sense and act with business integrity at all times.

Ask Questions

Discuss Concerns

Report Problems

Employees are expected to be proactive in their personal and professional commitment to upholding the Code. It is encouraged to ask questions, discuss concerns, and report problems.

At least annually, all employees review the Code and Acadia policies.

Compliance Department

compliance@acadia-pharm.com

1 (866) 921-6714

Compliance Hotline

Report actual or potential concerns to a third party. Anonymous reporting is available.

acadiapharmaceuticals.caseiq.app/portal/reportonline

1 (866) 921-6714

For More Information

Healthcare Compliance Roadmap

Employees should refer to the internal Acadia Healthcare Compliance Roadmap for more information.

Acadia
Code of Conduct

POLICIES & PROCEDURES — DATA PROTECTION — ANTI-TRUST

ANTI-KICKBACK — RECORD MAINTENANCE

MEALS & HOSPITALITY — MEDIA RELATIONS — ANTI-CORRUPTION

ENVIRONMENTAL COMPLIANCE — CONFLICTS OF INTEREST

REPORTING CONCERNS — PROPER USE OF COMPANY ASSETS

Compliance with all Regulations & Policies

Regulations, Policies, & Procedures

Our success depends upon each employee operating within legal guidelines and cooperating with local, national, and international authorities. We expect employees to understand Acadia policies that are meant to protect the company by complying with legal obligations.

It is not expected that employees memorize every detail of laws, rules, and regulations, but rather **understand the core principles** and be able to determine when to **seek advice from Compliance.**

Compliance Training

Periodic training sessions will be made available to ensure that all employees are aware of and comply with the relevant laws, rules, and regulations associated with their roles.

Consequences of Non-Compliance

Disregard of Company policies and procedures or the law will not be tolerated. Violations may result in corrective action, disciplinary action (including termination) and/or civil and criminal penalties.

Employees should be aware that conduct and records, including emails, are subject to internal and external audits, and to discovery by third parties in the event of a government investigation or civil litigation.

If the investigation indicates that a violation of this Code has likely occurred, we will take such action as we believe to be appropriate under the circumstances. If we determine that an employee is responsible for a Code violation, they will be subject to disciplinary action, up to and including termination of employment and, in appropriate cases, civil action or referral for criminal prosecution. Appropriate action may also be taken to deter any future Code violations.

Managers Have an Important Responsibility

Managers must promptly report any complaints or observations of Code violations to the Chief Compliance Officer. If you believe your manager has not taken appropriate action, you should contact the Chief Compliance Officer directly.

Managers are expected to develop a sense of dedication to the Code and to compliance within their teams. Different roles and geographical locations may require unique compliance considerations. However, it is the responsibility of a manager to ensure that all employees and contractors conform to Code standards when working for or on behalf of the Company.

Anti-Corruption & Anti-Bribery

Employees are expected to comply with applicable laws in all countries in which we do business. This includes compliance with all laws prohibiting bribery and corruption.

In some countries, common business practices may differ and include use of payments and bribes. Acadia is bound by applicable U.S. laws that prohibit such practices and must compete solely on the value of the products and services we provide.

U.S. anti-corruption laws, rules, and regulations must be followed at all times, regardless of where the business is taking place.

U.S. Foreign Corrupt Practices Act

Among other anti-corruption and anti-bribery legislation and guidance, employees must comply with the U.S. Foreign Corrupt Practices Act, or FCPA. The FCPA prohibits directly or indirectly giving anything of value to a government official to obtain or retain business or favorable treatment. It also requires the maintenance of accurate books of account and the recording of all applicable Company transactions.

Anti-Trust

Anti-trust laws are designed to protect the competitive process. Anti-trust laws generally prohibit:

- Agreements with competitors that harm competition or customers
- **Example:** Price fixing or allocations of customers, territories, or contracts
- The acquisition or maintenance of a monopoly or attempted monopoly

Certain kinds of information, such as pricing, production, and inventory, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be and regardless of the setting, whether business or social.

Environmental Compliance

The Company is committed to conducting business in a way that reduces our environmental impact.

This includes:

- Minimizing or eliminating the use of any substance or material that may cause environmental damage
- Reducing waste generation and disposing of all waste through safe and responsible methods
- Employing safe technologies and operating procedures
- Being prepared to respond appropriately to accidents and emergencies

Conflicts of Interest

Employees should avoid conflicts of interest. These may occur when their personal interests may interfere in any way with the performance of their duties or the best interests of the Company.

A conflicting interest could result from an expectation of personal gain now or in the future.

Even the appearance of a conflict of interest can be damaging and should be avoided.

Conflicts of interest can and do come up. Be aware and proactively connect with Compliance.

Keep In Mind

Ethical issues or conflicts may occur through action by members of an employee's immediate family, significant others, or other persons who live in their household to the extent that they involve the Company business.

Conflicts of Interest Are Broad

Actual or potential conflicts of interest are broad and dependent on many facts and circumstances, as well as the individuals involved. Examples of conflicts of interest may include:

- Employment or contract for consulting or other services for or on behalf of a competitor, customer, supplier, or other service provider
- Owning, directly or indirectly, a significant financial interest in any entity that does business, seeks to do business, or competes with the Company
  - This includes conducting Company business transactions with family members
- Soliciting or accepting gifts, favors, loans, or preferential treatment from any person or entity that does business or seeks to do business with the Company
- Soliciting contributions to any charity or for any political candidate from any person or entity that does business or seeks to do business with the Company
- Taking personal advantage of corporate opportunities
  - Employees may not use their position with the Company or corporate property or information for improper personal gain, nor should employees compete with us in any way
- Having a second job in addition to regular employment with the Company, without permission
- Exercising supervisory or other authority on behalf of the Company over a co-worker who is also a family member

Record Maintenance

Corporate and business records should be completed accurately and honestly. The integrity of our records and public disclosure depends upon the validity, accuracy, and completeness of the information supporting the entries.

False or misleading entries or statements, whether they relate to financial results or test results, are strictly prohibited.

The Company requires that:

- No entry be made in our books and records that intentionally hides or disguises the nature of any transaction or any of our liabilities, or misclassifies any transactions as to accounts or accounting periods
- Transactions be supported by appropriate documentation
- Terms of sales and other commercial transactions be reflected accurately
- Employees comply with our system of internal controls
- No cash or other assets be maintained for any purpose in any unrecorded fund

Our accounting records are also relied upon to produce reports for our management, stockholders, and creditors, as well as for governmental agencies.

Employees who collect, provide, or analyze information for, or otherwise contribute in any way in preparing or verifying these reports should strive to ensure that our financial disclosure is accurate, timely, understandable, and fairly presented.

Always create proper documentation and most importantly–do what those documents say you do.

Fair Dealings

The Company strives to outperform competition fairly and honestly.

Advantages over competitors are to be obtained through superior performance of our products and services, not through deceptive, unethical, or illegal business practices.

Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited.

Employees, especially those involved in procurement, are expected to deal fairly with our customers and suppliers.

Meals, Hospitality, & Educational Items

Occasional meals, hospitality, educational items, or periodic business courtesies can be useful tools to facilitate legitimate business discussion about Company products, disease states, and patient education.

Gifts and entertainment may not be offered, provided, or accepted by any employee.

Anti-Kickback Statute

The U.S. Anti-Kickback Statute is a healthcare fraud and abuse law that prohibits the exchange of anything of value in exchange for services that are payable by a federal program, like Medicare or Medicaid. It includes the prohibition on gifts to HCPs.

Example:

A value transfer may include:

- Meals
- Travel
- Invitations or tickets to recreational or sporting events
- Charitable donations

Detailed Company guidance on appropriate meals, travel, and donations are established through Standard Operating Procedures (SOPs). All employees are expected to be aware of, and comply with, Company limits and procedures.

Review the HCC Roadmap and Expense Reporting SOP for more information.

Protection & Proper Use of Company Assets

All employees are expected to protect Company assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on our profitability. Company property, such as office supplies, computer equipment, buildings, and products, are expected to be used only for legitimate business purposes.

Employees may not use the Company name or brand for any personal purpose.

Employees may not access the Company internal computer or commit any unlawful or illegal act, including harassment, libel, fraud, or sending of unsolicited bulk email.

All data residing on or transmitted through Company computing and communications facilities, including email and word processing documents, is the property of the Company and subject to inspection, retention, and review by the Company, with or without an employee's or third party's knowledge, consent, or approval, and in accordance with applicable law.

Confidentiality

As an employee of the Company, you may learn of information about the Company that is confidential and proprietary. You also may learn of information before that information is released to the general public.

Confidential information includes business, marketing and service plans, financial information, inventions, designs, databases, customer lists, pricing strategies, personnel data, and personally identifiable information pertaining to our employees, customers, or other individuals. This information may be protected by patent, trademark, copyright, and trade secret laws.

Employees who have received or have access to confidential information should take care to keep such information confidential, until it is disclosed to the public.

Unauthorized use or distribution of such information may also be illegal and result in civil liability and/or criminal penalties.

Information Protection

Employees should take care not to inadvertently disclose confidential information in person or digitally. Store information and devices securely and be cautious when discussing sensitive information in public places like elevators, airports, and eating spaces. All Company emails, voicemails, and other communications are presumed confidential and should not be shared outside of the Company, except where required for legitimate business purposes.

Use of Personal Social Media

Personal social media may not be used for Company business. Unauthorized posting or discussion of any information concerning our business, information, or prospects on the internet is prohibited—even if such posting or discussion is limited to personal opinion.

Insider Trading

Employees who have access to confidential or "inside" information are not permitted to use or share that information for stock trading purposes or for any other purpose except to conduct our business.

This includes non-published clinical trial data and internal performance metrics, such as sales and performance data.

The use of non-public information in connection with buying or selling securities, including "tipping" others who might make an investment decision on the basis of this information, is not only unethical, but also illegal.

Company confidential information must always remain confidential.

Privacy & Data Protection

While data and privacy rights may vary depending on an individuals' region, the Company respects the data privacy rights of all Company employees, as well as those of the patients we serve and HCPs we work with.

The Company may collect personally identifiable information relating to employees for business, legal, or contractual purposes, and keep the information for as long as required by law or regulation.

The Company takes great care to ensure:

- Data integrity
- Integrity of the technology we use
- Protection against fraud and abuse
- Proactive detection of unauthorized access or use of data
- Security of all data according to regional requirements and industry best practices

Media & Public Discussions

Material information concerning the Company is disclosed to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in the Company will have equal access to information.

All inquiries or calls from the press and financial analysts should be referred to the Chief Executive Officer or Chief Financial Officer.

Example:

If a media reporter reaches out for comment, verbally, digitally, or in writing, immediately refer them to Corporate Communications. Do not provide ad hoc or supplementary commentary.

Employees may not provide any information to the media about the Company off the record, for background, confidentially, or secretly.

Waivers

Any waiver of this Code for executive officers or directors may be authorized only by our Board of Directors or, where permitted, a committee of the Board. This will be disclosed to stockholders as required by applicable laws, rules, and regulations.

Compliance Standards & Procedures

As part of an effective Compliance Program, the Company:

- Investigates possible violations of the Code
- Trains new employees on the Code content
- Provides annual Code of Conduct training
- Distributes copies of the Code annually to each employee with a reminder that each employee is responsible for reading, understanding, and complying with it
- Updates the Code as needed and alerts employees to any updates
- Promotes an atmosphere of responsible and ethical conduct

Compliance Resources

Employees should use their manager as an immediate resource for ethical and compliant business guidance.

If you encounter a situation or are considering a course of action and its appropriateness is unclear, discuss the matter promptly with your manager or the Compliance team.

Even the appearance of impropriety can be damaging and should be avoided.

Your Responsibility to Report Concerns

If you are aware of a suspected or actual violation of this Code, you have a responsibility to report it to your manager, the Compliance team, or Human Resources.

If concerns involve potential misconduct by another person and relates to questionable accounting or auditing matters, employees may report that violation directly to the Company's Audit Committee.

Employees may ask questions about Company policy, seek guidance on specific situations, or report violations of this Code by:

Calling our Compliance Hotline at 1 (866) 921-6714

- Anonymous reporting is available

Sending an email to our Compliance team at compliance@acadia-pharm.com

Acadia Pharmaceuticals Inc. Open Door Policy for Reporting Complaints Regarding Accounting & Auditing Matters

Statement of Policy

ACADIA PHARMACEUTICALS INC., a Delaware corporation (the "Company"), is committed to providing a workplace conducive to open discussion of our business practices and is committed to complying with the laws and regulations to which we are subject. Accordingly, the Company will not tolerate conduct that is in violation of such laws and regulations. Parties, including employees of the Company and its subsidiaries, are encouraged to promptly report a good faith complaint regarding accounting or auditing matters in accordance with the provisions of this policy. To facilitate the reporting of complaints regarding accounting or auditing matters, the Audit Committee of our Board of Directors (the "Audit Committee") has established procedures for (i) the receipt, retention and treatment of complaints regarding accounting, internal accounting controls, or auditing matters ("Accounting Matters") and (ii) the confidential, anonymous submission by Company employees of concerns regarding questionable accounting or auditing matters. This policy is a supplement to the Company's Code of Business Conduct and Ethics (the "Code") and should be read in conjunction with the Code.

Scope of Accounting Matters Covered by Policy

This policy covers complaints relating to Accounting Matters, including, without limitation, the following types of conduct:

- fraud, deliberate error or gross negligence or recklessness in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud, deliberate error or gross negligence or recklessness in the recording and maintaining of financial records of the Company;
- deficiencies in, or noncompliance with, the Company's internal accounting controls;
- misrepresentation or false statement to management, regulators, the outside auditors or others or by a senior officer, accountant or other employee regarding a matter contained in the financial records, financial reports or audit reports of the Company; or
- deviation from full and fair reporting of the Company's results or financial condition.

Policy of Non-Retaliation

It is the Company's policy to comply with all applicable laws that protect our employees, (including the employees of our subsidiaries), against unlawful discrimination or retaliation by us or our agents as a result of their lawfully reporting information regarding, or their participation in, investigations involving Accounting Matters. If any employee believes he or she has been subjected to any harassment, threat, demotion, discharge, discrimination or retaliation by the Company or its agents for reporting complaints regarding Accounting Matters in good faith and in accordance with this policy, he or she may file a complaint with our Chief Compliance Officer. If it is determined that an employee has experienced any improper employment action in violation of this policy, we endeavor to promptly take appropriate corrective action.

Chief Compliance Officer

The Audit Committee has delegated the responsibility for administering this policy to our Compliance Department. Our Chief Compliance Officer is Kevin Ryan. The Compliance Department may be reached at (858) 261-2938 or compliance@acadia-pharm.com. The Chief Compliance Officer is responsible for receiving and reviewing and then investigating (under the direction and oversight of the Audit Committee) complaints under this policy.
If an employee has a complaint regarding an Accounting Matter, he or she should report such matter to the Chief Compliance Officer. If the suspected violation involves the Chief Compliance Officer, the employee should instead report the suspected violation to the chair of the Audit Committee.

Anonymous Reporting of Complaints

We have also established a procedure under which complaints regarding Accounting Matters may be reported anonymously. Employees may anonymously report these concerns to either (i) our Compliance Hotline at 1 (866) 921-6714, (ii) our Compliance Email Box at compliance@acadia-pharm.com, or (iii) by delivering the complaint via regular mail to the Chief Compliance Officer or the individual indicated in the prior paragraph. Employees should make every effort to report their concerns using one or more of the methods specified above. The complaint procedure is specifically designed so that employees have a mechanism that allows the employee to bypass a manager he or she believes is engaged in prohibited conduct under this policy. Anonymous reports should be factual, instead of speculative or conclusory, and should contain as much specific information as possible to allow the Chief Compliance Officer and other persons investigating the report to adequately assess the nature, extent and urgency of the investigation.

Policy for Receiving and Investigating Complaints

Upon receipt of a complaint, the Chief Compliance Officer will determine whether the information alleged in the complaint pertains to an Accounting Matter. The Audit Committee shall be notified promptly of all complaints determined to pertain to an Accounting Matter and shall determine the planned course of action with respect to the complaint, including determining that an adequate basis exists for commencing an investigation. The Chief Compliance Officer will then appoint one or more internal and/or external investigators to promptly and fully investigate each viable claim under the direction and oversight of the Audit Committee or such other persons as the Audit Committee determines to be appropriate under the circumstances. The Chief Compliance Officer will confidentially inform the reporting person (if his or her identity is known) that the complaint has been received and provide him or her with the name of, and contact information for, the investigator assigned to the claim.

Confidentiality of the employee submitting the complaint will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation. During any investigation, the Company may find it necessary to share information with others on a "need to know" basis. If the investigation confirms that a violation has occurred, the Company will promptly take appropriate corrective action with respect to the persons involved, including discipline up to and including termination, and, in appropriate circumstances, referral to governmental authorities, and will also take appropriate steps to correct and remedy any violation.

Retention of Complaints

The Chief Compliance Officer will maintain a log of all complaints, tracking their receipt, investigation and resolution, and shall prepare a periodic summary report thereof for each member of the Audit Committee. Each member of the Audit Committee and, at the discretion of the Chief Compliance Officer, other personnel involved in the investigation of complaints, shall have access to the log. Copies of the log and all documents obtained or created in connection with any investigation will be maintained in accordance with our document retention policy.

Investigating Concerns

The Compliance team will investigate all reported possible Code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances.

Neither you nor your manager may conduct any preliminary investigation, unless authorized to do so by the Chief Compliance Officer.

All Company employees who are requested to assist in, contribute to, or support an investigation must give their full cooperation.