

Code of Conduct



August 1, 2022

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INTRODUCTION

G1 Therapeutics (“G1” or the “Company”) is committed to improving the lives of those impacted by cancer. Our Code of Conduct reflects our values as a company and serves as a framework to govern all of our activities as we pursue this mission.

Our Values

Patients are waiting...



Bring your best; love what you do and why you do it

BE PASSIONATE



Aim high, act with integrity, and demand the best from each other

DO IT RIGHT



Success requires that we challenge convention and embrace change

SHOW COURAGE



We achieve more when we respect each other and work together

WORK AS ONE TEAM

Be Passionate

At our core, we are passionate about our mission of helping patients who are impacted by cancer. We are passionate about our products and about our roles in helping to provide patients with lifesaving medications. We love what we do, and it shows. This passion drives us to challenge convention, seek out opportunities, and strive to continuously improve the results of our endeavors.

Do It Right

We strive to be the best and demand the best from ourselves and our colleagues. “Doing it right” means challenging ourselves and others to continually strive for success, ensure quality, and meet challenges head-on. We work with integrity, professionalism, and respect for each other, our patients, and their families. We promote open, honest collaboration, and don’t take shortcuts or compromise on ethics in order to get things done.

Show Courage

Developing ground-breaking therapeutics demands courage. We challenge prevailing beliefs, take risks, and enthusiastically embrace change. We have the courage of conviction to do the right thing in all situations and insist that others do the same. We speak up when needed, take ownership of our actions, and support others to do the same.

Work as One Team

We recognize that each and every one of us play roles that matter at G1, and that strong teamwork is essential to success. We are clear on our responsibilities and recognize the effectiveness of diverse teams. We work together to fulfill our goals and live our values. We treat each other with respect and honesty, learn from and correct mistakes, and celebrate and reward our successes.

OUR CORPORATE CODE

Who, What and Why

Who: This Code of Conduct (the “Code”) applies to everyone acting on the Company’s behalf, including our officers, directors, employees, and agents. In short, anyone working for, conducting business with, or engaged to perform services for, or on behalf of, G1 is expected to understand the principles of this Code of Conduct and is responsible for adhering to it.

What: The Code is the framework for how we approach all of our corporate activities. As an organization, we obey regulations and we make ethical choices. We have the courage to do the right thing. When the need arises, even if it is difficult, we speak up, we ask questions, and we exercise good judgment. The Code conveys our values and sets clear expectations of our behavior as members of G1. We are committed to having the courage to always do what is right. This Code of Conduct lays out the foundational principles on which we operate, and is a resource designed to help guide us to act with the highest possible standards for ethical interactions and business conduct. The Code provides us with a common understanding of what it means to do the right thing when interacting with colleagues, customers, and the community.

Why: Our Code serves as a guide in all that we do in order to meet our mission of addressing patients who are impacted by cancer and behaving consistently with our values. It helps clarify our expectations of compliance with applicable laws, rules and regulations. It represents and guides us to delivering on G1’s commitment and accountability to conduct business ethically at all times and touches on many important areas such as how to handle actual and apparent conflicts of interests, internal reporting of Code violations, and transparent disclosure in external reports such as those required by the Securities and Exchange Commission (“SEC”).

The Code cannot provide answers for every possible situation, but it outlines the Company’s expectations for behavior in important areas. It has references to Company resources, like policies and procedures, which can provide you with additional guidance, and directs you on where to seek further guidance if you need it.

Our Responsibilities under the Code

With the Code as our foundation, we should each apply its principles and guidelines in our day-to-day work:

- Be familiar with and follow the laws, regulations and policies that apply to your job.
- Be honest and demonstrate integrity in all you do for or on behalf of G1.
- Listen, speak up and take accountability if something is wrong or you do not know how to handle a situation.

Managers should:

- Make sure employees know how the Code and other Company policies apply to their jobs.
- Expect ethical conduct from yourself and from your team.
- Consider ethical and compliant conduct when evaluating employees. Lack of adherence to the Code cannot be rewarded.

- Make it clear that employees must not violate the Code’s standards – and never suggest that they must do so to achieve a business outcome.
- Watch for and stop any violations of the Code, law or other policies by employees you supervise.
- Managers must notify Human Resources (“HR”), the Compliance Department or the Legal Department as appropriate when concerns arise.
- Never retaliate against an employee who raises a question or concern.

Disciplinary Action

Any employee who violates the Code, Company policies and procedures, or the law will be subject to disciplinary action, up to and including termination of employment. Disciplinary action will be applied consistently and fairly throughout the Company in accordance with our policies. In determining what action is appropriate, all relevant information will be taken into account, including the nature and severity of the violation, whether the violation was intentional or inadvertent, the extent of the likely damage to the Company and its shareholders resulting from the violation, and whether the employee has committed previous violations of the Code or other G1 policy.

Disciplinary measures may also apply to any supervisor who directs or approves such actions or has awareness of them and does not promptly correct them.

Implementation of the Code and Annual Acknowledgment

All employees are expected to observe the letter and spirit of this Code of Conduct. Although G1 will make every effort to provide compliance information to employees and to respond to all inquiries, responsibility for compliance, including the duty to seek guidance when in doubt, rests with each of us.

Upon commencement of employment, and again annually or at other appropriate times, each employee must sign a statement that s/he has read and understand the Code or that s/he has complied with the Code, as the case may be. This statement also requires you to confirm that you will comply with this Code of Conduct in your daily work activities. At G1, doing the right thing is how we do business.

Speaking Up

All organizations face the risk of things going wrong from time to time, which can potentially lead to illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations from occurring and to address them when they do occur.

G1 is committed to an open-door culture. This means that we embrace the obligation that we have to ourselves, our company and to good citizenship, to ask questions and report suspected wrongdoing as soon as we are aware of it, knowing that concerns will be taken seriously and investigated as appropriate and confidentially.

G1 is committed to ensuring that employees can ask questions and voice concerns without fear of retribution, and that all concerns raised will be treated fairly.

Questions and concerns can be raised in a number of ways. If comfortable and appropriate, an employee may speak to (i) his/her manager or someone in his/her management chain, (ii) HR, (iii) any member of the Executive Leadership Team, (iv) the Compliance Department, (v) the Legal Department, and (vi) the Chief Compliance Officer.

To support this principle, G1 has a hotline and a website for raising concerns:

1-844-755-3396

g1therapeutics.ethicspoint.com

Employees are encouraged to use these resources any time and especially in those instances when they want to report a concern and wish to remain anonymous. Both the hotline and the website have the capability to receive questions and concerns and maintain anonymity.

Genuine concerns raised will be investigated as confidentially as possible.

This key element of our Code of Conduct is supported by a Whistleblower Policy. Please see the policy for further details.

Compliance with Laws and Regulations

Compliance with laws and regulations is integral to how we demonstrate our ethics and integrity as a company and commitment to doing it right. Compliance is following all applicable laws, regulations, rules, policies and procedures and, just as importantly, acting in accordance with the spirit of the rules.

G1 is committed to behaving in compliance with all of the laws and regulations that govern our business. We regularly update our policies and practices to help guide all of our business activities. The Company expects all employees to follow this Code of Conduct and conduct business with the highest degree of professionalism and honesty. While you are not expected to know every detail of the laws and regulations that apply to our company, it is important that you review and understand this Code of Conduct and how it applies to your work. Questions and concerns about appropriate business conduct should be promptly raised to your manager, HR representative, or the Compliance department.

At G1, we are all expected to be honest, fair, and accountable in all business dealings and obligations, and to ensure:

- Handling of conflicts of interest between personal and professional relationships ethically
- Full, fair, accurate, timely and understandable disclosures in all reports and information provided to the Securities and Exchange Commission, and in other public communications made by the Company
- Honesty and accuracy in advertising, promotion and discussion of our products, and compliance with all applicable laws, rules and regulations

Because we are dedicated to improving the lives of those impacted by cancer, many of us at G1 interact with healthcare professionals and healthcare organizations. There is special guidance governing our interactions with healthcare providers. We comply with all applicable laws that regulate these interactions throughout all facets of our work, from preclinical development to clinical trials, consulting arrangements, marketing and sales interactions.

We do the right thing because it's the right thing to do: for ourselves, for G1, and for our patients.

Conflicts of Interest

A conflict of interest can occur when an employee takes actions that puts his/her own interests in conflict with Company responsibilities. There are many different ways that this can happen, and as an employee at G1, you should be aware of, and avoid possible conflicts of interest. Conflicts of interest are not always clear, and even the perception of a conflict can be problematic. Open and honest communication and transparency is important, even in situations where the probability of an actual conflict of interest is small.

G1 has a Conflicts of Interest Policy. Please refer to it to learn more about the requirements of avoiding Conflicts of Interest.

If you identify a conflict or possible conflict of interest situation, contact the Compliance Department or the Chief Compliance Officer to assess the situation and ensure that any conflicts can be resolved.

What is a Conflict of Interest?

Conflicts occur when your personal interests conflict with your responsibilities to G1. It is impossible to list all potential conflicts, but below are some examples. If you are unsure about a particular situation or are aware of a situation that might create a conflict (or the appearance of a conflict), it is important that you consult your manager, HR, or the Compliance department. Even situations that present a small probability of actual conflict should be disclosed. Examples of potential conflicts of interest that should be disclosed include:

- Having an ownership stake in, or conducting business on your own behalf with a competitor, supplier, business partner or contractor of G1
- Serving as an employee, board member, consultant or contractor for a competitor, customer, vendor, contractor or other business partner of G1
- Investing in, or having a financial interest in, a competitor, supplier, contractor, advisor or other business partner of G1. Certain factors may impact your ability to invest in such organizations, including the size of the investment, your access to confidential information, and the nature of your relationship with the companies
- Accepting gifts of more than nominal value from any person or company seeking to do business with G1, regardless of the purpose of the gift
- Immediate and close family members conducting any of the above activities may also create a conflict of interest. For example, having a spouse or life partner who works for a competitor, customer, or supplier might create a conflict of interest and should be disclosed and reviewed as soon as you are aware of the potential conflict

HANDLING INFORMATION

Public Disclosures, Confidentiality, Intellectual Property

Public Disclosure of Information

As G1 carries out its mission to improve the lives of those impacted by cancer, the Company will, from time to time make public statements, such as press releases, social media posts or other public presentations. Other than those individuals authorized to make public disclosures, no one may make public disclosures of information about G1.

We are also required to provide certain reports and disclosures to the SEC. Employees involved in preparation and disseminations of these reports and public statements are expected to ensure that the content of these reports is full, fair, accurate, timely, and understandable.

Only authorized individuals may make these public statements, reports and disclosures which must be approved by appropriate stakeholders such as Legal, Finance and the Board of Directors prior to releasing or presenting the information.

Posting on Social Media can be an accidental cause of public disclosures

Refer to Company policies regarding corporate communications and Social Media.

Best Practices:

- If you re-post or share a G1 social media posting, minimize or avoid any commentary
- Do not create any substantive original material
- If you have relevant information you think G1 should post, please forward it to Corporate Communications

This Code and G1 policies only limit your social media activities as it relates to G1 news, G1 product news, G1 activities and G1 Trade Secrets/Confidential Information/Material, Non-Public Information.

Confidentiality

Confidential and proprietary information are among G1's most important assets. Confidential information includes all non-public information, such as unpublished research concepts, ideas, materials, business plans, financial information, customer lists and clinical and customer data. Confidential information also includes proprietary information such as intellectual property, trade secrets and other ideas generated in the course of business.

Our ideas and proprietary information enable us to develop products that improve patients' lives and helps us compete in the marketplace. The release of confidential information may unfairly help our competitors or otherwise harm G1, our customers, vendors, or other business partners. Unauthorized disclosure of proprietary or confidential information undermines our mission, violates this Code of Conduct, and can result in disciplinary action or termination of employment. In some instances, inappropriate disclosure of proprietary or confidential information violates the law and may result in civil or criminal penalties.

We demonstrate our ethics and integrity by safeguarding confidential information. You are required to maintain confidentiality of all confidential information entrusted to you, and not disclose or share it with anyone not otherwise authorized to receive the information. As employees, directors and officers, the obligation to maintain confidentiality lasts throughout the duration of your relationship with the Company and continues even after service to or employment by the Company ends. These obligations are set forth in the Confidentiality and Inventions Agreement that you executed upon commencement of your employment.

It is also important to be aware when working or having conversations in public spaces to avoid inadvertent disclosure of confidential material.

If you are not certain whether information is confidential information, treat it as such until you are able to consult with your manager to confirm how to handle the situation.

In addition to the confidentiality obligations set forth in this Code, the Company has several other policies that address confidentiality and how the Company's information is disclosed to the public, including:

- Disclosure Controls and Procedures for Periodic Reporting under the Securities Exchange Act of 1934
- Form 8-K Disclosure Compliance Policy
- Insider Trading Policy
- Corporate Disclosure/Regulation FD Policy

PROTECTING CONFIDENTIAL INFORMATION

There are simple steps that we can all take to help protect G1 proprietary and confidential information:

- Do not discuss or share proprietary or confidential information unless you are certain that the other person is also authorized to have that information.
- Be sure to utilize an appropriate non-disclosure agreement before sharing confidential information with a third party.
- Be cautious when having conversations in public spaces. If you need to discuss proprietary or confidential information, or work on confidential documents, make sure that others cannot overhear or see the confidential content.
- Keep your laptop, phone and other devices secure. Utilize appropriate screen locks and passwords, and don't leave devices in locations where they may be accessed by others or stolen.

Intellectual Property

Intellectual property is one of G1's most important assets. The patentable ideas and inventions that we create while employed at G1 belong to the Company. Any new inventions created by an employee in the course of his/her employment (including new product candidates, product components, processes, devices, designs, methods, parts and systems, and any improvements to any intellectual property owned by the Company) must be promptly disclosed to the Legal Department.

Intellectual property owned by G1 must be treated as confidential information and must not be disclosed or discussed with anyone not authorized to have the information.

Similarly, our Company ethics demand that we behave fairly and honestly with respect to the intellectual property of others. Do not endeavor to obtain or discuss the intellectual property of another company or individual without first having the appropriate documented approval in place. You may not use intellectual property created by third parties without appropriate licensing and prior approval of the Legal Department.

If you are uncertain about whether something is intellectual property, or whether appropriate approvals are in place, be sure to consult with your manager or a member of the Legal Department. Similarly, if you become aware of inappropriate disclosure or questionable use of

What is Intellectual Property?

In simple terms, Intellectual Property protects anything created by or for G1. Our intellectual property includes our products, systems and other things that we may invent, our patents, trademarks, copyrights, trade secrets, and scientific and technical knowledge.

intellectual property, it is your responsibility to contact the Legal Department, so that the situation may be addressed.

Theft or misuse of intellectual property is prohibited. Should you become aware of intellectual property that has been inappropriately obtained, or that someone is seeking to obtain intellectual property in an inappropriate or illegal manner, you are required to immediately contact the Legal Department.

Recordkeeping and Reporting

We believe in honesty and transparency with the public, and with our customers, shareholders and patients. Accurate recordkeeping and document retention are ways that we demonstrate that we are doing things the right way. We all have a role to play in ensuring that we maintain accurate information about Company activities.

Good recordkeeping is critical to prevent fraud and mistakes and to avoid the spread of false or misleading information. It is central to everything we do, from conducting clinical trials that help bring lifesaving medicines to patients in need, to keeping track of employee hours worked, tracking corporate expenses, and budgetary planning for the future. It is required by law that G1 keeps books, records and accounts that accurately and fairly document all Company transactions.

Poor recordkeeping can result in errors and confusion that lead to expense and delay which undermine our therapeutic mission. False, misleading, or dishonest recordkeeping is strictly prohibited, and may result in disciplinary action, including termination of employment, as well as criminal or civil legal actions.

G1 has a Record Retention Policy. Please refer to it to ensure proper retention and deletion of G1 records.

Should you become aware of improper or questionable recordkeeping practices (including improper or questionable accounting or auditing practices), you must immediately report these concerns to the Chief Compliance Officer or as described in our Whistleblower Policy.

Your Role in Recordkeeping

- Be timely, honest, accurate and complete when recording and reporting business expenditures, accounts and business information
- Never alter or avoid required internal or external reporting
- Do not ask others to alter or avoid required internal or external reporting
- Always use an appropriate professional tone in all communications (including emails, video and voice recordings), avoid exaggerations, inaccurate or inappropriate characterizations of people or subjects
- Retain and destroy documents according to G1's Record Retention Policy
- Do not destroy or alter any document that is the subject of a legal hold order or is needed as part of any investigation or government inquiry

Insider Trading

Everyone at G1 should be aware of our insider trading policy. Non-public information about G1 may not be used to buy or sell securities. The use of material, non-public information, also known as inside information, to buy or sell securities is considered insider trading, even if the trading is done by someone who is not an employee of the Company. Such activity violates this Code of Conduct as well as insider trading laws and could result in disciplinary action, termination of employment, criminal prosecution and civil enforcement actions.

If you are unsure whether you have non-public information in your possession, contact the Legal Department.

What is insider trading?

Buying or selling stock in any company while having material, non-public information about that company.

Sharing material, non-public information with others who might make an investment decision based on the information that you provide.

What is inside information?

Inside information is any material, non-public fact or information about a company that has not yet been released to shareholders that may give an investor an unfair advantage in making decisions about buying or selling securities in such company. Inside information can include: non-public financial results or forecasts, clinical trial or product approval information, corporate strategy information, information about potential mergers or acquisitions, important litigation matters and management changes.

FAIR COMPETITION

At G1, we aspire to reach our goals and achieve our mission through free and fair competition. There are important laws and regulations that guide our activities in this regard. We will comply with all applicable antitrust and competition laws, rules and regulations and expect all employees to follow this Code of Conduct, as well as other Company policies and rules with respect to fair competition.

We do not seek to gain advantage through the improper use of favors or other inducements. Offering, giving, soliciting or receiving any form of bribe to or from any customer, vendor, supplier, regulatory official, healthcare professional, clinical investigator or site is strictly prohibited.

Antitrust laws limit corporate activities in order to maintain a free and fair competitive playing field. They apply to our activities with respect to competitors, customers and all other business partners. Certain actions and activities are against the law and are strictly prohibited. The rules include prohibition on price or market collusion with competitors, bribery, product or service

boycotts, and sales conditioned on the purchase of other products or services. These laws and rules can be complex and situational, so it is important to consult with the Legal Department in any situation where potential antitrust concerns exist.

Fair Competition Basics

- Don't misrepresent our products. False advertising, lies, and misrepresentation when engaged in public discussion about our products is not only unethical, but it also violates Company policy, this Code of Conduct and the law.
- Don't disparage the competition. Be passionate and focus on what our Company and products bring to the table. It is acceptable to point out actual weaknesses or flaws in a competitor's product or operations, but it is critical to stick to facts. Do not spread false rumors, anecdotal or unverified stories, or other misrepresentations.
- Don't engage in other disruptive or unfair practices. Posing as a prospective customer, offering gifts or payment to a competitor's employees, offering or taking bribes, or using or disclosing the confidential information of another company for business gain are strictly prohibited.

Do the right thing

Respect the competition, be ethical, and compete fairly

SCIENTIFIC INTEGRITY

G1 is committed to its research and pursuit of discovering and commercializing products that impact those with cancer. In our research and development efforts, we are dedicated to conducting ourselves with high standards of integrity and scientific discipline. We aim to design and approve clinical research that mitigates unnecessary risks, in which participants understand the nature and purpose of the research, and that follows proper procedures for gaining informed consent. We adhere, and expect our development partners to adhere, to all international laws and regulations governing clinical trials and other aspects of product development such as Good Clinical Practice, Good Laboratory Practice, regulations regarding handling all forms of life in the laboratory, as well as handling patients, data privacy, data validation and publication transparency laws.

QUALITY

As the manufacturer and distributor of healthcare products, G1 is committed to delivering applicable quality standards for our products and promoting good public health. Patients and customers who use our products rely on us to ensure products and services comply with quality standards. To maintain our dedication to quality, appropriate procedures have been implemented and must be followed in the design and development of our products. Failing to adhere to proper quality policies and procedures could result in: (i) government agency action against our facilities, products or employees; and (ii) removal of our products from the market. Employees have the responsibility to follow quality procedures and to address and correct any non-

compliance. To help G1 address any issues in a timely manner, employees must notify their manager, the Company's quality professionals or other appropriate personnel as soon as possible if a situation occurs or is observed that does not comply with our quality policies or procedures, or could adversely affect the quality of our products.

WORKPLACE CONDUCT

Embrace Diversity

No Discrimination or Harassment Tolerated

In order to be successful as one team, our core values require that we treat each other with respect and professionalism. G1 is an equal opportunity employer and makes employment-related decisions without regard to a person's race, color, religion creed, age, sex, sexual orientation, marital status, national origin, ancestry or any other legally protected status. This policy applies to all employees, as well as to our Board of Directors. It encompasses all of our employment practices, including recruiting, hiring, conditions of employment, compensation, performance reviews, promotion, and professional development.

G1 is committed to maintaining a workplace consistent with our values. It is our expectation that everyone is treated with dignity and respect. Harassment of any kind will not be tolerated. This includes verbal harassment (such as derogatory comments including jokes, insults and threats), physical harassment (such as unwelcome physical contact or touching), and sexual harassment (such as statements about physical appearances, and unwanted sexual jokes or comments).

Employees who feel that they are the subject of discrimination or harassment, have witnessed discrimination or harassment, or have other related concerns or complaints are encouraged to report the situation to HR. Issues of this nature can be difficult to raise and discuss. We strive to ensure that allegations will be treated with confidentiality and respectfully in order to protect everyone involved. Retaliation against employees who report discrimination or harassment is prohibited.

Work as One Team

- Treat each other with professionalism and respect
- Be aware of individual differences, and refrain from topics, conversations and jokes that could make someone uncomfortable
- Speak up if you feel that others are creating an uncomfortable workplace, if you feel harassed, or believe that someone else is being harassed
- Point out dangerous or unsafe working conditions or environments so that they can be addressed

Fair Labor Practices

At G1, we believe in the protection of human rights for all employees. We implement policies that are consistent with fair labor practices and support the rights of minority groups and women. We are also committed to the principles of diversity, non-harassment, and fair and competitive wages.

In all places that we conduct business, we will comply with applicable wage and labor laws. All suppliers and vendors will also be required to comply with applicable fair labor and employment laws and failure to do so may result in termination of the business relationship.

We stand firmly opposed to all illegal and unethical practices that violate our standards, including forced labor, child labor, and human trafficking. Business partners who utilize such practices will face immediate termination of our relationship.

If you become aware of any action by any G1 employee or by any of our external partners that violates these principles, it is important that you notify your manager, HR or the Legal Department.

Health and Safety

G1 is committed to a safe, clean, and healthy place to work. We all play a role in helping to maintain a healthy and safe workplace. You are responsible for following applicable health and safety rules and procedures and for immediately reporting accidents, injuries, unsafe working conditions, practices or equipment. Considerations such as budgetary expenses, production deadlines, or urgent business needs never justify the perpetuation of unsafe conditions.

You are prohibited from engaging in conduct that contributes to an unsafe work environment. Threatening words or actions, violent behavior, and the abuse of alcohol or illegal drugs in the workplace are not permitted and may result in immediate termination of your employment.

Use of Company Property

Everyone at G1 is responsible for the appropriate use and care of Company property. Company property includes both tangible property (things like printers, computers, paper, facilities, etc.) and intangible property (intellectual property, information, corporate reputation and goodwill).

As an employee, you have an obligation to follow Company rules and guidance regarding the use and care of Company property. Certain types of tangible property, such as your computer and cell phone, may be used on a limited basis for personal use (if such use is not otherwise impermissible under this Code of Conduct), but you should exercise good judgement and ensure that your use of such property is reasonable, limited and appropriate. Excessive or abusive use of Company property for personal use may result in disciplinary action, up to and including immediate termination.

What does “limited personal use” of corporate property look like?

Appropriate use of certain types of corporate property, such as phones and computers, is acceptable, provided that the use:

- Is not otherwise illegal or impermissible under this Code of Conduct
- Is not used for personal gain
- Is limited in scope and duration
- Does not infringe upon performance of your job or result in any additional cost to the Company

Protecting the Environment

G1 is committed to holding ourselves to a high environmental standard. We expect everyone, including our Board of Directors, to consider the environmental impact and sustainability of our activities. We continuously strive to produce, market, and deliver our products in an environmentally responsible manner, and seek to engage suppliers and business partners who share in the commitment of preserving our world for future generations.

COMMUNITY CONDUCT

Advertising / Promotional Activities

G1 is committed to accurate, fair and ethical practices in all of our advertising and promotional activities. Discussions about our products are subject to specific advertising and promotional laws and our promotional activities are also regulated by the United States Food and Drug Administration (“FDA”). All conversations with customers, potential customers, government agencies and representatives, patients, and other public audiences must be consistent with approved product labeling, and must provide a fair, balanced, accurate and lawful representation of product capabilities and benefits. Advertising and promotional materials may only be used after full legal, regulatory and medical review and approval.

Giving and Receiving Gifts, Meals and Entertainment

It is important to keep in mind that giving or receiving gifts, meals or entertainment in a business setting can create a conflict of interest. You should also be aware that within the life science industries, there are specific codes of behavior and rules (such as The Pharmaceutical Research and Manufacturers of America Code on Interactions with Health Care Professionals (the “PhRMA Code”) designed to guide our interactions with healthcare professionals remain legal, ethical and appropriate. We are committed to compliance with all local and industry laws, rules and regulations governing meals, gifts and entertainment.

Additionally, gifts, meals and entertainment given to or received from government officials or representatives are often governed by specific local laws and regulations. Gifts, meals and entertainment with government representatives are permissible only if they comply with applicable laws and with this Code of Conduct. To ensure that the applicable local rules are being followed, you should consult with your manager and the Legal Department prior to providing or receiving gifts, meals or entertainment in these settings.

In order to ensure that it is clear that we are operating with the highest ethical standards, it is our policy that, except for common courtesies usually associated with customary business practices, gifts, favors, and entertainment may not be accepted by Company representatives (or their family members) from any person or organization that does or seeks to do business with the Company.

If you are offered a gift of more than token value, or if the gift is being offered by a government

Gifts to or from individuals (who are not healthcare professionals or government representatives) are permissible only if:

- The gift is consistent with customary business practices,
- Is not excessive in value,
- Cannot be seen as a bribe or pay-off,
- Will not embarrass the Company or any employee if disclosed, and
- Does not otherwise violate any local law, regulation, industry code or custom

official or representative, you must consult with the Chief Compliance Officer prior to accepting the gift.

Interacting with Healthcare Professionals

At G1, we have the privilege of interacting with healthcare professionals on a regular basis. We demonstrate our ethics and integrity in every interaction with physicians, researchers, nurses, medical staff and other healthcare professionals through our compliance with laws, rules, and regulations. We are committed to full compliance with all federal and state laws that govern our interactions with healthcare providers.

There are a number of important laws that apply to our interactions with healthcare professionals. FDA laws and regulations regulate the content of promotional activities with healthcare professionals, and industry guidance, such as the PhRMA Code (adopted as law in a number of jurisdictions) provide important standardized guardrails for our relationship with the healthcare community. It is important that you familiarize yourself with these rules and regulations and follow this Code of Conduct and all Company policies as they relate to your interactions with healthcare professionals.

The federal anti-kickback statute prohibits the knowing and willful payment of remuneration to a physician, hospital, or other healthcare provider with the intent to induce referral of patients, or the ordering or recommendation of items or services paid for by any federal healthcare program. Violations of this law, or similar state anti-kickback laws, can result in significant penalties, including criminal penalties, fines and exclusion from Medicare and Medicaid programs. Although there are certain safe harbor exceptions to these laws, it is important that you comply with all Company policies when interacting with healthcare providers, and make sure that you ask questions, or reach out to the Chief Compliance Officer if you have questions or concerns.

Federal and state laws also prohibit knowing and willful false statements or representations made in connection with a claim submitted for reimbursement to health care programs such as Medicare, Medicaid, and similar state agencies. A violation of these statutes can result in significant criminal and civil penalties. You are responsible for following all Company policies, trainings, and practices to ensure compliance with applicable false claims laws.

You are required to engage with healthcare professionals in compliance with this Code, all Company policies, training, rules and guidelines to ensure that our interactions with healthcare professionals are conducted in accordance with our high standard for ethics and integrity. Questions and concerns should be directed to the Compliance Department.

Anti-Corruption

G1 stands against corruption and bribery in all aspects of our business. No one representing the Company, from employees to executives to the Board of Directors may give, offer, or promise to give (directly or indirectly) any payment of money, or transfer anything of value to any government official, political party, or candidate for public office in an effort to obtain business. The United States and many individual states and other countries all have stringent laws aimed at the prevention of corruption. We will comply with all laws in all locations in which we conduct business, including the US Foreign Corrupt Practices Act (“FCPA”).

Keep in mind that healthcare payors, providers, academic institutions, hospitals, healthcare systems and other entities can sometimes be considered government agencies and their staff are government employees. You are responsible for understanding whether external individuals and

organizations may fall into this category. If you do engage with entities or individuals that may fall into this category, it is important for you to ensure that you work with your manager and the Compliance Department to ensure that your actions follow local rules.

G1 has an Anti-Bribery Anti-Corruption Policy. Please refer to it to ensure compliance with G1's requirements.

Do it Right

- Never offer or accept money, gifts, donations, grants or other items of value in exchange for, or in order to induce another to use, prescribe or recommend our products
- Never offer or accept money, gifts, donations, grants, or other items of value in exchange for, or in order to influence the actions or decisions of any government official
- Ensure that you are familiar with anti-corruption and anti-bribery rules as they apply to your work
- Ensure that all transactions are recorded accurately and promptly, and follow Company accounting policies and procedures

Interacting with Government Officials

G1 is committed to interacting with government officials ethically and with good faith, honesty and fairness. It is important to know that certain health systems, payors and physician organizations may be government-owned and their staff considered to be government representatives.

The United States government and many other state, local, and international governments have adopted specific laws to govern interactions with government agencies and representatives. Government interaction specific rules include anti-bribery and anti-corruption laws, specific rules regarding government procurement of goods and services, and rules about meals, gifts and entertainment.

Employees who interact with government agencies, officials, employees and representatives must be aware of, and abide by all applicable laws, rules and regulations that govern such interactions. If you have questions or are unsure of the rules or whether a particular individual or organization may be considered a government agency or representative, consult with your manager or the Legal Department.

It is also critical to keep in mind that all other elements of this Code of Conduct, including advertising and promotional guidance, still apply. Ensure that product messaging and materials shared with government representatives have received prior regulatory and legal approval for such use.

Public / Media Relations

In order to ensure that accurate and appropriate information is communicated with the public, the media, and the government, G1 limits public announcements, presentations, and other discussion of the Company with members of the media to those individuals who have been approved and trained on these interactions and must ensure that all disclosures in such presentations and documents are still subject to SEC requirements for full, fair, accurate, timely and understandable communications. Unless you have been approved as a Company spokesperson, you should not respond to requests or inquiries from the media or to unsolicited calls or emails seeking confidential information regarding G1, but you may politely refer them to an appropriate approved spokesperson.

Social Media

G1 is committed to open, clear, and responsible public communications and community interactions. To that end, social media is a powerful tool for sharing our work with the world, building trust, and establishing a platform to quickly convey important news about our medicines. Improper use of these services, or dissemination of inaccurate or misleading information, can also lead to irreparable harm and could diminish all of our efforts. In order to engage responsibly on social media, only authorized individuals may create, use or add content to social media accounts owned by, or operated on behalf of, G1.

While G1 does not want to interfere in personal social media activities, good judgement and common sense are required at all times. For example, if your social media profile indicates that you are an employee of G1, then anything you post about G1 or G1 products, is “officially” attributable to G1 and would require legal and regulatory review. Therefore, do not write any original posts about G1 products. Disclosure of confidential or proprietary information, disparagement of the Company or its employees, as well as conduct that is illegal, violates G1 policies and this Code of Conduct, and may result in disciplinary action, up to and including termination of employment.

WAIVERS

In limited, rare circumstances, waivers of this Code of Conduct may be granted, and only by the Chief Compliance Officer. Waivers of this Code of Conduct requested by an executive officer or member of the Board of Directors will be evaluated by the Board through the Company’s waiver procedure. Waivers of this Code of Conduct that are granted will be disclosed publicly, as required by applicable laws and regulations.