



*Quality of Science. Quality of Life.*

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# Code of Conduct

## Commitment to Integrity

Our Code of Conduct (Code) defines and reflects our commitment to ethical business practices in our daily interactions. Individually, and as members of the Dimension Therapeutics (Dimension) team, each of us is responsible for acting with integrity. Our reputation for ethical and compliant behavior is a corporate asset that each of us has a duty to safeguard and strengthen as we preserve the public trust and the trust of Patients and Healthcare Professionals (HCPs), our customers, investors, governmental authorities, Business Partners (e.g., third party vendors, agents, suppliers) and other stakeholders.

This Code is not meant to describe every situation you may face, but rather sets forth the standards that all of us are expected to meet, and to point you in the right direction for more specific information when you need it. In general, if there are questions or concerns about this Code, employees are encouraged to speak with their managers or Compliance.

## What is Expected

**We are responsible and law abiding.** Ethical and compliant behavior strengthens the company and ensures our continued success. Dimension is committed to conducting its business ethically and in compliance with all applicable international, federal, state, and local laws, regulations, guidelines, industry codes and internal policies. The standards in this Code should be viewed as the *minimum standards* that Dimension expects from its officers and employees in the conduct of Dimension's business.

**We use common sense and ask questions if necessary.** Each of us is expected to be proactive in exercising our commitment to ethics and compliance in a way that will merit the continued trust and confidence of all of our stakeholders. As each of us performs our daily business activities, it is important that we use common sense and good judgment to guide us in determining appropriate behavior. However, if we are unsure, we should seek guidance by consulting with our manager or other senior leadership. We ask questions.....we don't guess.

In all situations, consider the consequences to Dimension and yourself. When presented with a difficult ethical choice, ask yourself these questions before making a decision:

- Would my actions be legal?
- Would my actions reflect well on me and Dimension?
- Would I feel comfortable if my actions were reported as headline news?

If the answer is NO.....then don't take the action.

**We abide by our code.** This Code applies to all employees, officers, and directors of Dimension. We also expect our Business Partners to abide by the principles of this Code.

**Our officers and managers have additional responsibilities.** Our officers and managers serve as a role model for high ethical standards and create a culture of honesty and respect. We expect our officers and managers to be a resource for employees and create an environment where employees are comfortable raising concerns. We expect our officers and managers to take opportunities to reinforce the importance of appropriate conduct with employees and to take reasonable actions to detect and prevent misconduct.

**Waivers of the Code of Conduct.** Dimension does not permit any waiver of this Code or associated policy for any Director or Executive Officer unless (i) approved by the Board of Directors or, if permitted, a committee of the Board of Directors, and (ii) if applicable, such waiver is promptly disclosed to the Company's stockholders in accordance with applicable laws, rules and regulations. Any waivers of the Code for other employees may be made by the Compliance Officer, the Board of Directors or, if permitted, a committee of the Board of Directors. Changes to the Code may be made only by the Board of Directors, and will be promptly disclosed as required by law or stock exchange regulation.

## **Commitment to Patients, HCPs, Customers, and Business Partners**

**We do not permit bribery, kickbacks, or other improper payments.** Dimension's policy against bribery is clear—we never make or accept bribes, kickbacks or other improper payments, transfers, or receipts to win, retain, direct, or advance our business. A bribe is something of value that is offered or given to improperly influence a decision. Bribes often consist of money, but they could also be disguised as Gifts, trips, entertainment, charitable donations, favors, or jobs. We do not offer, solicit, or give anything of value to win, retain, direct, or advance business, to influence a business or prescribing decision, or to advance our interests with government authorities, regardless of local custom.

More specifically, we abide by the U.S. Foreign Corrupt Practices Act (FCPA), which prohibits any U.S. individual or business 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 with the intention of obtaining or retaining business or for any other business advantage. Violation of the FCPA could subject Dimension and its individual officers, manager, and employees to serious fines and criminal penalties.

In addition, the U.S. government has a number of laws and regulations regarding business gratuities that may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules would not only violate the Code, but could also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules. Our Chief Financial Officer can provide guidance to you in this area.

Additionally, our interactions with healthcare professionals, Government Entities, government employees, and other related entities must be legitimate and never used to obtain an improper advantage or to improperly influence or encourage a Dimension product decision by them.

**We conduct ethical clinical research.** When engaging in Clinical Study activities, we expect colleagues to protect the rights, safety and privacy of all study subjects, as well as the integrity of associated data. In addition, we will transparently report Clinical Study results and findings accurately, fairly, completely and in a timely manner, in accordance with applicable international, federal, state, and local laws, regulations and industry standards.

Dimension and its Business Partners comply with applicable international, federal, state, and local laws, regulations, and international standards, associated with:

- Good Clinical Practice
- Good Laboratory Practice
- Good Manufacturing Practice
- Good Pharmacovigilance Practice
- Good Distribution Practice
- Good Publication Practice

**We are responsible for drug safety.** Each of us, including our Business Partners, is responsible for reporting any adverse or safety information to the Chief Medical Officer, or designee.

**We respect our relationships with Healthcare Professionals.** We are committed to respect HCPs' professional independence, avoid inducements in any form, and follow the guidelines that govern these interactions and relationships. Our interactions with HCPs are intended to benefit Patients and enhance the practice of medicine. Interactions are focused on informing HCPs about the benefits and risks of products, providing scientific and educational information, supporting medical research and education, obtaining market research, or obtaining feedback and expert medical advice about our scientific and medical activities.

In our globalized marketplace, international, federal, state, and local laws and international standards of many countries must be considered when undertaking interactions with HCPs. Interactions that include Fair Market Value (FMV) payments, hospitality, educational items, congress attendance, or travel are commonly governed by local laws or industry codes. When in doubt, we consult the appropriate internal resource if we are unsure whether a planned business activity with a HCP is appropriate. Our employees refer to their managers, Compliance, or other third party vendors (e.g., contract research organization) for country specific guidance. If more than one law, regulation, or industry code is applicable, the more stringent rule will apply.

Many HCPs are employed full-time or part-time by government-owned or government-controlled institutions. Whether employed full-time or part-time, HCPs who work for

government-owned or government-controlled institutions are considered Government Employees. Additionally, private persons acting for the government (including part-time) are considered Government Employees. Particular care should be taken when providing anything of value or engaging Government Employees/Entities for services.

**We respect our relationships with Patients and Patient Organizations.** We are committed to working with Patient Organizations to sponsor research, provide educational and support services for Patients, and may award Educational Grants or Sponsorships to benefit the mission of Patient organizations. Our relationships with Patient Organizations are structured in a manner that ensures the independence of the Patient Organization and supports the organization's mission.

Where allowed by international, federal, state, and local law and local industry codes, Dimension will provide information directly to the public (e.g. website, print materials) that:

- Motivates Patients to contact their HCP and engage in a dialogue about health concerns; and
- Educates Patients about treatment options, including Dimension products.

If more than one law, regulation, or industry code is applicable, the more stringent rule will apply.

**We safeguard confidential information and protect employee privacy.** In the course of its ordinary business activities, Dimension collects personal data information on Dimension employees, HCPs, Patients, Business Partners, and other individuals throughout the world. We respect and safeguard the private information and intellectual property entrusted to us, using it only for Legitimate Business Purposes and in accordance with all applicable laws and governing contracts.

We are all also responsible for protecting Dimension's confidential information. We do not disclose any confidential Dimension information without a valid business purpose and proper authorization by the Chief Executive Officer. Our obligations in this respect continue even if our employment or other relationship with Dimension ends.

**We deal fairly.** We endeavor to deal fairly with our customers, Business Partners, competitors, and employees. We will not take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation, or any other unfair-dealing. Applicable international, federal, state, and local antitrust, unfair competition, and trade regulation laws of the United States and all countries in which Dimension does business specifically prohibit us from colluding with a competitor. When interacting with a competitor, questions about whether our actions are proper and in compliance with applicable laws should be directed to Compliance.

**We respect laws governing global trade.** When conducting business transactions across borders, we comply with all applicable international, federal, state, and local import and export

and trade embargo laws and regulations restricting the movement of products, information and financial assets. We follow the U.S. anti-boycott laws that prohibit or penalize participation in and cooperation with international boycotts not sanctioned by the United States. We comply with these laws and regulations even if it may result in the loss of some business opportunities.

## Commitment to Our Colleagues

**We treat others fairly and respectfully.** We foster a respectful work environment free from any form of discrimination, harassment, and intimidation. We provide equal opportunity in all aspects of employment. We do not tolerate discrimination, harassment, violence, or threatening behavior of any kind. We treat everyone—fellow employees, customers, Business Partners and other stakeholders—with dignity and respect.

**We are committed to a safe and healthy workplace.** We are committed to providing a clean, safe, healthy, secure, and drug and alcohol-free workplace. Our employees have responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices and by reporting accidents, injuries and unsafe conditions, procedures, or behaviors. We do not tolerate violence and threatening behavior.

We do not permit the use, possession, sale, or being under the influence of any illegal substance at Dimension or when representing Dimension in any capacity or conducting Dimension business. We do not possess or consume alcohol on company premises except at authorized Dimension events. We do not bring weapons onto Dimension premises or to a Dimension-sponsored event.

## Commitment to Dimension and Its Investors

**We do not permit insider trading.** Material nonpublic information is information that has not been disclosed to the general public through a press release or a securities filing that a reasonable investor would consider important in deciding whether to buy or sell a company's securities.

Federal law prohibits both trading on the basis of material non-public information and "tipping" others by providing material non-public information to them. We do not buy or sell stock on the basis of material non-public information, or pass this information to any others, including Business Partners, friends or family.

**We avoid conflicts of interest.** We have a responsibility to make sound business decisions strictly on the basis of Dimension's best interests without regard to our personal interests. A conflict of interest can occur when our personal activities, investments or associations compromise our judgment or ability to act in the best interest of Dimension. We avoid conflicts of interest, or even the appearance of a conflict of interest.

We proactively disclose relationships, associations, transactions, or activities that may create actual, potential, or perceived conflicts of interest to our managers, officers, or Compliance

either directly or via the Compliance Hotline as soon as we become aware of any potential for a conflict.

**We respect corporate opportunities.** We may not take for ourselves opportunities that are discovered through the use of Dimension property, information, or position, and we will not use Dimension property, information, or position for personal gain, or to compete with Dimension in any manner. We owe Dimension a duty to advance its legitimate business interests when business opportunities arise.

**We maintain accurate and complete business and financial records.** We create and maintain books, records and financial statements that are honest, accurate, objective, complete and timely in order to ensure that we make sound business decisions, truthfully reflect our business to potential or actual investors, and adhere to applicable legal requirements and generally accepted accounting practices.

Our SEC reports, disclosures, and other public communications must be full, fair, accurate, timely, and understandable. Although financial reporting and controls are especially applicable to members of Dimension's Finance Department, we are each responsible for complying with all financial controls and policies. We each acknowledge our responsibility to make sure that appropriate Finance Department personnel are made aware in a timely manner of any fact or issue that might have a material impact on our financial statements or disclosures.

We maintain and report to applicable governmental agencies, as and when required by international, federal, state, and local law or industry code, relevant details regarding any payments and other compensation (e.g., honoraria, hospitality, educational items, meals) that are provided to HCPs, healthcare organizations or other covered entities.

**We respond to media inquiries responsibly.** To ensure honest, professional, and legally compliant responses to requests for information, we authorize a limited number of employees to communicate to the press and members of the financial community about Dimension. Authorized individuals are the Chief Executive Officer, Chief Business Officer, Chief Financial Officer, and Vice President of Strategy.

**We provide quality information to our stockholders.** We are committed to providing our stockholders with complete and accurate information about our 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 the Securities and Exchange Commission and other public communications we make, include fair, timely and understandable disclosure. Our authorized individuals who are responsible for these filings and disclosures must use reasonable judgment and perform their responsibilities honestly, ethically and objectively in order to ensure that this disclosure policy is fulfilled. Our Chief Executive Officer, Chief Business Officer, Chief Financial Officer, and Vice President of Strategy are primarily responsible for monitoring the Company's public disclosure.

**We use social media wisely.** We use social media appropriately and responsibly. We will not post information about any Dimension product, service, or other Dimension business activity unless authorized to do so by the Vice President of Strategy. We do not disclose confidential Dimension information or the confidential information of our employees, customers, Patients, or Business Partners. Only those authorized may speak for Dimension, including through social media channels.

**We protect and properly use Dimension assets.** Theft, carelessness, and waste have a direct impact on our profitability. We use Dimension assets for Legitimate Business Purposes, and in particular, will use Dimension's information systems assets in a responsible manner. We do not use Dimension equipment or systems to create, store or send content that is illegal or unprofessional. Should we terminate our employment or discontinue to provide services to Dimension, we will return all of Dimension's confidential and/or proprietary information and property.

## Raising Concerns and Reporting Issues

**Proactively seek guidance.** Every employee is expected to follow the Code and its associated policies. We encourage one other to proactively ask questions, seek guidance, and report suspected violations of the Code and associated policies. When we have a question, we seek out our managers or Compliance. If the question is related to our manager, or if we do not believe the manager has answered our question efficiently, we may direct the question to Compliance either directly or via the Compliance Hotline. Our Board of Directors has delegated day-to-day responsibility for administering and interpreting the Code to a Compliance Officer. Our Director of Quality and Compliance has been appointed the Company's Compliance Officer under this Code.

**Violations of the Code, Dimension policies, or the law.** Anyone who violates the law, our Code, or other Dimension policies may be disciplined, including termination of employment and/or his or her business relationship with Dimension, in accordance with international, federal, state, and local law. Certain violations of this Code may be violations of the law, which may result in civil or criminal penalties, and Dimension will cooperate fully with the appropriate authorities in these situations.

**We are responsible for reporting violations.** If we witness or suspect a violation of our Code, Dimension policies, or the law, we are each responsible for promptly reporting it to our manager, Compliance, or other senior leadership either directly or via our Compliance Hotline.

**Compliance Hotline.** Dimension has established a confidential outside resource made available to us 24 hours, 7 days a week to report concerns and potential violations of the Code, our policies and applicable laws and regulations. Calls and reports to the Compliance Hotline may be made confidentially. Anonymous reports may be made where allowed by local law. Each of

us is responsible for using these reporting channels in good faith and in a truthful and reasonable manner.

To make a good-faith report, please use any of the following:

- Directly speak with or email your manager or the Compliance Officer
- Mail: Dimension Therapeutics  
Attention: Compliance  
840 Memorial Drive  
Cambridge, MA 02139
- Compliance Hotline (anonymously or not) by phone at 1-844-280-0006 or online at [www.lighthouse-services.com/dimensiontx](http://www.lighthouse-services.com/dimensiontx) or by email to [corpcomplianceinfo@dimensiontx.com](mailto:corpcomplianceinfo@dimensiontx.com).

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 (including FCPA) matters should be directed to the Audit Committee or a designee of the Audit Committee. Officers and employees may communicate with the Audit Committee or its designee:

- Mail: Dimension Therapeutics  
Attention: Chairperson of the Audit Committee  
840 Memorial Drive  
Cambridge, MA 02139
- Compliance Hotline (anonymously or not) by phone at 1-844-280-0006 or online at [www.lighthouse-services.com/dimensiontx](http://www.lighthouse-services.com/dimensiontx) or by email to [corpcomplianceinfo@dimensiontx.com](mailto:corpcomplianceinfo@dimensiontx.com).

**We understand anonymity.** Although calls and reports to the Compliance Hotline or mail may be made confidentially and anonymously (where allowed by local law), we encourage reporters to identify themselves when making a report. This helps to facilitate a more complete, thoughtful, and appropriate investigation. We will use reasonable efforts to protect the confidentiality of the reporting person, subject to applicable law, rule or regulation or to any applicable legal proceedings.

**We respond to concerns and issues.** Dimension is committed to investigating and responding to reported concerns and issues in a timely and appropriate manner. Personnel are expected to cooperate in any investigation of a potential violation of the Code, any other company policy or procedure, or any applicable law, rule, or regulation.

**We do not tolerate retaliation.** Dimension takes its non-retaliatory culture very seriously and will not allow anyone to take adverse action, threaten, harass, intimidate, or retaliate if one of us reports a violation or suspected violation in good faith, or cooperates in an investigation. Specifically, Dimension will not discharge, demote, suspend, or in any other manner discriminate against anyone who makes a report in good faith or who cooperates in an investigation. Dimension considers retaliation itself a violation of this Code and will respond accordingly.

## **Access and Maintenance of the Code**

**We make the code available to directors, employees, managers, and officers.** Dimension is committed to ensuring that directors, employees, managers, and officers have access to and are trained on the Code, including any revisions. Personnel can access the Code and associated policies via our internal document control system. The Code will be updated periodically and personnel will be asked to retrain accordingly. Changes will be promptly disclosed to Dimension's shareholders in accordance with applicable United States securities laws and/or the rules and regulations of the exchange or system on which Dimension's shares are traded or quoted.

**We monitor for adherence to the Code.** Dimension's management, under the supervision of its Board of Directors or a committee thereof or, in the case of accounting, internal accounting controls, auditing or securities law matters, an Audit Committee, will take reasonable steps from time to time to:

- monitor for compliance with the Code, including the establishment of monitoring and auditing systems that are reasonably designed to investigate and detect conduct in violation of the Code;
- when appropriate, impose and enforce appropriate disciplinary measures for violations of the Code.