## ALKERMES PACS AND CORPORATE POLITICAL CONTRIBUTIONS

Alkermes has established the Alkermes, Inc. Political Action Committee and the Alkermes, Inc. Political Action Committee Massachusetts (each an Alkermes PAC), funded solely through eligible U.S. employee and director contributions. The Alkermes PACs offers employees and directors a means to voluntarily support legislative efforts that support our mission of serving patients.

In certain states where it is permitted, Alkermes makes corporate political contributions to support state election campaigns, state party committees and state ballot measures. Our corporate political contributions do not include direct independent expenditures. Alkermes operates in accordance with all applicable laws.

Alkermes does not expect candidates who receive Alkermes PAC or corporate political contributions to agree at all times with our positions on policy issues. Rather, we seek to support candidates who recognize the importance of medical innovation in improving the lives of patients, and more generally, the importance of broad access to quality, affordable health care.

Alkermes' PAC contributions are intended to promote the company's interests and the interests of the patients we serve. These contributions are made without regard to the private political preferences of our officers, executives or directors. Contributions to office holders and candidates are bipartisan and are determined by unanimous action of the officers of the applicable Alkermes PAC or by our corporate political contributions committee, as applicable, who represent a cross-functional group of our U.S. employees.

The following factors are considered in determining the individual recipients of corporate political contributions and Alkermes PAC contributions:

- 1. The values and integrity of the candidate
- 2. The candidate's representation of a jurisdiction of importance to us
- 3. The candidate's position on issues of importance to us
- 4. The candidate's service in a leadership role
- 5. The nature and strength of the opposition to the candidate
- 6. The candidate's financial need

The officers of the Alkermes PAC consider the same factors when making decisions to contribute to a political party or other political committee.

Members of our executive management team review and approve all corporate political contributions to ensure such contributions are consistent with our guidelines and in accordance with applicable laws. Alkermes PAC contributions are reported to the Federal Election Commission on a regular basis, available <u>here</u>, and to state election commissions as required by law. In addition, to ensure transparency, information about all political contributions in the U.S. by the company and the Alkermes PACs is provided in a <u>biannual report</u>, categorized by state, recipient, party affiliation, office sought (where applicable) or other description, the source of the contribution and the amounts contributed.