

Political Contributions and Expenditures

1.1 PURPOSE AND SCOPE

Neurocrine engages in the political process to advance the long-term interests of the company and shareholders. Neurocrine Corporate Affairs is responsible for managing Neurocrine’s public policy issues and government relations worldwide. When participating in particular public policy discussions, Neurocrine Corporate Affairs pursues mutual objectives of global consistency and local relevancy and evaluates the impact on Neurocrine’s growth and business operations.

1.2 COMPLIANCE AND OVERSIGHT

The Neurocrine Board of Directors has a Nominating and Corporate Governance Committee (NCGC) that has oversight over Neurocrine policies and practices in connection with governmental relations, public policy political contributions, and related expenditures. Separately, Neurocrine has a Political Action Committee (PAC). The Neurocrine PAC is a nonpartisan organization that provides opportunities for employees and directors to participate in the American political process. The PAC may make contributions to candidates for both federal and state office and fully discloses its contributions on a regular basis to the Federal Election Commission and the appropriate state election authorities. The PAC is overseen by the Political Action Committee Board (PACB). Neurocrine management periodically reports to the PACB and NCGC on policies, practices and activities.

1.3 POLICY

1.3.1 **Political Contributions**

In the U.S. there are important federal and state campaign finance laws with which Neurocrine complies, including those which prohibit and/or restrict the use of corporate treasury funds for political purposes. Corporate funds may not be used to contribute to candidates for federal office. However, corporate funds may be used, where legally permissible, to contribute to candidates for state and local office.

It is the policy of Neurocrine to fully comply with all federal, state, and local laws and reporting requirements governing corporate political contributions.

1.3.2 **Public Policy Expenditures and Lobbying**

Neurocrine may make expenditures to support or advocate particular viewpoints on public policy issues, including expenditures for intermediaries that advocate on Neurocrine’s behalf. This may include engaging with congressional staff, leadership and policy advisors on our public policy activities in order to provide thought leadership on issues that affect our business or our employees. In addition, Neurocrine may seek the participation of Neurocrine

employees in conveying the Neurocrine position to public officials when the issue may have an impact on Neurocrine, its employees, or patients. Public policy advocacy involving Neurocrine expenditures requires the prior approval of the Chief Corporate Affairs Officer, the Chief Financial Officer, and the Chief Legal Officer. Public policy advocacy on behalf of Neurocrine involving the participation of Neurocrine employees requires the approval of the Chief Corporate Affairs Officer.

Neurocrine engages in lobbying on issues of importance to its business, patients, customers, shareholders and employees. Neurocrine only seeks to affect government action on issues that affect our business, customers, shareholder or employees, or impact our patients, and only through specifically authorized and legally compliant lobbying activities. All Neurocrine lobbying activities require prior approval of the Chief Corporate Affairs Officer. When required by law, Neurocrine files lobbying disclosure reports with state governments.

1.3.3 Trade and Industry Associations

Neurocrine belongs to a number of trade associations worldwide, representing the interests of the biopharma industry, or the broader business community. These organizations work to bring about industry consensus and advocacy on major public policy issues. Neurocrine's participation in trade associations, including membership on a trade association board, does not mean that the company agrees with every position a trade association takes on an issue. Indeed, from time to time, Neurocrine public policy positions may differ from those of the trade association of which we are members.

1.3.4 Employee Public Service and Political Activity

Neurocrine employees have the right and are encouraged to pursue personal interests, including active participation in the political process in their communities. If a Neurocrine employee chooses to participate in political activity, they do so as an individual and not a company representative. Neurocrine employees may voluntarily participate in campaign activities but must do so on their own time, or by taking paid time off or an unpaid leave of absence. In situations where our employees wish to enter public services, the company has policies in place to avoid potential conflicts of interest.