

SpringWorks Compliance Program

SpringWorks has developed and implemented this comprehensive Compliance Program ("Compliance Program"), the purpose of which is to foster a culture of compliance and to prevent or detect violations of law or company policy. The Compliance Program incorporates the seven elements of an effective compliance program in accordance with the "Compliance Program Guidance for Pharmaceutical Manufacturers" developed by the United States Department of Health and Human Services, Office of Inspector General ("Compliance Program Guidance") and is consistent with the voluntary industry guidelines contained in the Pharmaceutical Research and Manufacturers of America Code on Interactions with Health Care Professionals ("PhRMA Code"). The Compliance Program is designed to promote accountability throughout various segments of the company's operations to ensure that all SpringWorks managers, employees, contractors, partners and agents conduct business in adherence with applicable federal, state, and local laws, regulations, ordinances, rules, and guidance ("applicable laws"), and in a manner that is consistent with the company's Code of Business Conduct and Ethics and underlying compliance-related policies and procedures. The Compliance Program represents SpringWorks' commitment, as a company, and by its officers, directors, employees, and agents, to the highest standards of business integrity and corporate conduct.

I. Responsibility and Oversight

A. Audit Committee of the Board of Directors

The Audit Committee of the Board of Directors oversees the implementation, operations, and effectiveness of the Compliance Program to ensure SpringWorks' adherence with all applicable laws, its Code of Business Conduct and Ethics, and applicable SpringWorks policies and procedures. The Audit committee oversees the performance of the Chief Compliance Officer and the Compliance Committee.

B. Chief Compliance Officer

The Chief Compliance Officer ("Compliance Officer") develops, implements, oversees, and monitors the Compliance Program and has an independent reporting authority and responsibility to SpringWorks' Board of Directors on compliance-related matters. The Compliance Officer chairs and works closely with the Compliance Committee to implement and monitor the Compliance Program.

C. Compliance Committee

The Compliance Committee ("Compliance Committee") consists of senior leaders from various functions and disciplines across SpringWorks who advise and support the Compliance Officer in the implementation and oversight of the Compliance Program. The Compliance Committee assists the Compliance Officer in evaluating compliance risks and ensuring the Compliance Program effectively prevents, timely detects, and takes corrective action for noncompliance of applicable laws, the SpringWorks Code of Business Conduct and Ethics, and SpringWorks' applicable policies and procedures.

II. Written Policies and Procedures

The SpringWorks Code of Business Conduct and Ethics has been established as a guiding principles document for SpringWorks employees, contractors, and agents to follow and measure the decisions they make. The Code of Business Conduct and Ethics is supplemented by more detailed compliance policies, procedures, work instructions, and other guidelines that implement those principles and specifically address risk areas relevant to pharmaceutical manufacturers, including those associated with federal healthcare programs and the sale and marketing of prescription drugs. To emphasize the importance of these written compliance standards and the principles contained in the Code of Business Conduct and Ethics, SpringWorks requires each of its managers and employees to certify that he or she has read and agrees to abide by the Code of Business Conduct and Ethics and SpringWorks' policies and procedures, electronic versions of which are available in SpringWorks' internal IT environment and publicly on the SpringWorks website.

III. Training and Education

Compliance training and education is essential to the SpringWorks Compliance Program to effectively communicate the ethical and compliance standards and requirements to SpringWorks employees. SpringWorks Compliance training program is intended to encourage a culture of compliance and adherence to the Code of Business Conduct and Ethics and applicable laws, policies, and procedures. All SpringWorks employees receive annual training on the Code of Business Conduct and Ethics and applicable Compliance policies and procedures.

The Compliance team is dedicated to periodically reviewing and assessing the compliance training plan to address emerging compliance risk areas and continuous adherence to applicable rules and regulations.

IV. Lines of Communication

SpringWorks Compliance team is committed to fostering a culture where all employees can raise or submit a complaint or concern without fear of retaliation. SpringWorks adheres to an "open door policy" and has established a confidential and anonymous hotline, called IntegrityWorks Hotline, which can be reached at 855-722-2291. The Hotline is available 24 hours a day, 7 days a week, to encourage anyone inside and outside of SpringWorks to submit a complaint or concern without being required to self-identify or provide any contact information. Failure by a SpringWorks employee to report known or suspected noncompliance with applicable laws, policies, or the Code of Business Conduct and Ethics, may be considered a violation and will be addressed accordingly.

Acts of retribution or retaliation against any person who in good faith reports a potential, suspected, planned, or actual violation of Compliance Program policies and guidelines and/or applicable laws is strictly prohibited and could lead to disciplinary action up to and including termination of employment.

V. Auditing and Monitoring

SpringWorks conducts regular internal risk assessments to ensure that the Compliance Program detects compliance risks to the company's business operations that can be managed and minimized by incorporating updates to address identified risk areas into Compliance Program policies and procedures, training and education, and auditing and monitoring activities as appropriate. SpringWorks also reviews the company's compliance-related auditing and monitoring activities periodically to confirm that compliance-related risks that have been identified through the annual risk assessment process are appropriately controlled.

VI. Responding to Potential Noncompliance

Although the Compliance Program increases the likelihood of preventing or identifying unethical, noncompliant, or unlawful activity, SpringWorks recognizes that even an effective compliance program will not eliminate all noncompliance. The Compliance Program, therefore, includes policies and procedures that require SpringWorks to respond promptly to compliance-related concerns regarding instances of potential, suspected, planned, or actual noncompliance with law or policy. Compliance concerns referred through any of the available communication channels are carefully reviewed, thoroughly investigated in a timely manner, and appropriately resolved.

The Compliance Officer or a designee promptly will review all reports of possible noncompliance to assess the need for a compliance investigation. If the Compliance Officer deems it necessary, an investigation will be conducted to determine whether a violation of the Compliance Program, the Code of Business Conduct and Ethics, or other law or policy has occurred. SpringWorks employees are expected to cooperate in the investigation of reported instances of potential, suspected, planned, or actual noncompliance.

VII. Disciplinary Guidelines and Corrective Actions

If a compliance investigation determines that noncompliance has occurred, SpringWorks will implement corrective action to address inappropriate conduct and deter future violations that considers all relevant factors on a case-by-case basis and is proportionate to the nature and severity of the noncompliance. Individual disciplinary measures may range from verbal or written warnings, to additional training and education, to suspension or termination of employment, or to other sanctions as appropriate, regardless of the individual's position within the company. The Compliance Officer will oversee the implementation of corrective measures in response to noncompliance with SpringWorks' directives and guidelines.

VIII. Reporting

The Compliance Officer provides regular compliance updates to the Audit Committee, the Chief Executive Officer, General Counsel and the Compliance Committee, typically on a quarterly basis and more frequently as needed, which may include, but are not limited to, immediate

reports of significant and material noncompliance with applicable laws, the Compliance Program, the Code of Business Conduct and Ethics, and/or compliance-related policies or procedures, or other significant and material compliance-related risk to SpringWorks. The Compliance Officer, with the support of the Compliance Committee, also will provide an annual Compliance Risk Assessment to the Audit Committee and the Chief Executive Officer.

In instances in which credible evidence of misconduct has been substantiated by an internal compliance investigation or any other source, and the misconduct may violate criminal, civil, or administrative law, the Compliance Officer will promptly consult with the General Counsel and, as appropriate, outside counsel regarding possible requirements to report the existence of the potential misconduct to appropriate federal and state authorities.

IX. Continuous Improvement

SpringWorks, through its Compliance Program, is dedicated to the establishment, operation, and maintenance of an effective Compliance Program. Any questions regarding the SpringWorks Compliance Program, including the Code of Business Conduct and Ethics, compliance-related policies and procedures, and/or compliance with applicable laws that govern the company's operations, should be directed to the Compliance team at Compliance.Ethics@Springworkstx.com.