

POLICY WHISTLEBLOWER PROTECTION

OBJECTIVE

To outline the company's whistleblower protection policy for serious and sensitive issues as defined in this policy.

SCOPE AND APPLICABILITY

This policy applies to the entire Actelion Group.

REVIEW AND APPROVAL

General Counsel 25-March-13 signed ¹

Corporate Affairs and Compliance 02-Jul-13 signed ²

CEO 16-Jul-13 signed ³

¹ Author, signs for correctness and completeness

² (Only if applicable) Reviewer, signs for control of correctness and completeness

³ Approver, signs for the release of this document

CONTENT

Actelion and its wholly-owned subsidiaries (collectively, the "Company") are committed to preventing adverse employment action of any kind against an employee of the Company for lawfully reporting information about serious and sensitive issues involving the following:

- (i) fraudulent activities within the Company (including wire fraud, mail fraud and bank fraud),
- (ii) questionable accounting, internal accounting controls or auditing matters of the Company,
- (iii) misconduct or illegal behaviour regarding marketing activities, inducement of prescriptions etc., and
- (iv) conduct by executives of the Company that violate the Company's Policy on Ethical Conduct, or that cause reports and other public disclosures by the Company that are not full, fair and accurate.

To advance this commitment, the Company has adopted this Whistleblower Protection Policy ("this Policy").

PROHIBITION OF ADVERSE EMPLOYMENT ACTION

It is a violation of this Policy for any officer, director, employee, contractor, subcontractor, or agent of the Company to take any adverse employment action or in any other manner discriminate against an employee of the Company for engaging in any conduct protected by this Policy. For the purposes of this Policy, adverse employment action includes terminating, demoting, suspending, threatening or harassing an employee of the Company.

EMPLOYEE CONDUCT THAT IS PROTECTED UNDER THIS POLICY

An employee of the company is protected under this Policy from adverse employment action of any kind for:

- (i) legitimately reporting, or causing to be reported, to Actelion's Compliance Office, Legal Department, Human Resources Department or local compliance representatives, or
- (ii) cooperating or assisting in an already initiated internal or external investigation regarding,:
- (iii) alleged fraudulent activity including wire, mail or bank fraud or securities fraud against stockholders,;
- (iv) alleged matters related to any questionable accounting or auditing issues, including, without limitation, the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement
- fraud or deliberate error in the recording and maintaining of financial records of the Company;
- deficiencies in or noncompliance with the Company's internal accounting controls;
- alleged misrepresentations or false statements to or by a senior officer or accountant of the Company regarding a matter contained in the financial records, financial reports or audit reports of the Company; or
- alleged deviations from full and fair reporting of the Company's financial condition.

- (v) alleged misconduct or illegal behaviour regarding marketing activities, inducement of prescriptions etc.,
- (vi) alleged conduct by executives of the Company that violate the Company's Policy on Ethical Conduct, or that cause reports and other public disclosures by the Company that are not full, fair and accurate.

REPORTING AND INVESTIGATING EMPLOYEE COMPLAINTS

The intended use of this Whistle Blower procedure is for serious and sensitive issues.

Matters described above should be reported to the Corporate Compliance Office at compliance@actelion.com or alternatively for written documents: Actelion Ltd, Actelion Compliance Office, Gewerbestrasse 16, 4123 Allschwil

The recipient in the Corporate Compliance Office should promptly report the matter to the Group Compliance Officer. The Group Compliance Officer should seek legal counsel from the Group General Counsel or his appropriate designate to determine next steps, such as additional reporting requirements and/or investigative steps. The actions taken will depend on the nature of the matter reported. Initial inquiries may be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed action without the need for investigation.

Please note: Employment-related concerns should continue to be reported through normal channels such as supervisors, local HR representatives, or to the Head of Human Resources.

REPORT TO COMPLAINANT

Whether reported to Actelion personnel or through the hotline, within a reasonable time period, as appropriate the complainant will be given the opportunity to receive follow-up on his/her report, including

- Acknowledging that the report was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response;
- Telling him/her whether initial inquiries have been made;
- Telling him/her whether further investigations will follow, and if not, why not.

Further Information

The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant.

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Information

As appropriate and subject to legal constraints, the complainant will receive information about the outcome of any investigation regarding his report.

Actelion Pharmaceuticals Ltd is a global biopharmaceutical company headquartered in Allschwil/Basel, Switzerland. Actelion concentrates on discovering, developing and marketing innovative drugs for high unmet medical needs. The company is quoted on the SIX Swiss Exchange (tickersymbol: ATLN).