

Intra-Cellular Therapies' Compliance Program

Our mission is to develop innovative treatments to improve the lives of individuals suffering from neuropsychiatric and neurologic disorders in order to reduce the burden on patients and their caregivers. As stated in our [Code of Ethics and Business Conduct \("Code"\)](#), the way we achieve our mission is just as important to our Company and to those we serve and drives us to put *Integrity First*.

The fundamental elements of Intra-Cellular Therapies' Compliance Program are described below:

Compliance Officer and Compliance Committee

Intra-Cellular Therapies has appointed a Chief Compliance Officer who is charged with developing, operating, and monitoring the Compliance Program. The Chief Compliance Officer reports directly to the Chief Executive Officer.

The Compliance Committee is comprised of the Chief Compliance Officer (Committee Chair), the Chief Executive Officer, the Chief Financial Officer, and the General Counsel and additional members to be appointed as the Chief Executive Officer may deem necessary. The Compliance Committee shall meet annually with the Board of Directors to review the Compliance Program.

Periodically, the Chief Compliance Officer may meet with a sub-committee(s) made up of senior level functional heads, including Legal and Human Resources, to identify and mitigate risks.

Compliance Policies and Procedures

As part of its commitment to the highest ethical standards of business conduct, Intra-Cellular Therapies has implemented policies and procedures specific to the pharmaceutical industry and the Company's operations as well as the evolving business and regulatory environment.

The Company expects employees at all levels of the organization to comply with the Compliance Program, the standards set forth in the Code, the Company's policies and procedures, and all applicable laws and standards.

A number of policies and procedures are designed to ensure that interactions with healthcare professionals are appropriate, ethical, and consistent with applicable laws and standards, including (but not limited to) the April 2003 Compliance Program Guidance for Pharmaceutical Manufacturers issued by the U.S. Department of Health and Human Services Office of Inspector General (the "OIG Guidance"), the Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals, as revised and effective October 2019 ("PhRMA Code").

Training and Educational Programs

A critical component of the Compliance Program is the training and education of employees concerning their general ethical obligations and their specific obligations to comply with Company policies and procedures and with the applicable laws and regulations that apply to their functional area. Intra-Cellular Therapies has implemented training programs to educate employees on the Code, on new and existing compliance policies, and on the standards and

procedures applicable to their job functions. New employees receive compliance training as part of their initial training and continue to receive on-going compliance training throughout the year. The Company implements additional training for the entire Company or certain departments on an as-needed basis.

Communicating Compliance Issues and Concerns

Intra-Cellular Therapies is committed to fostering an environment in which open communications regarding questions about the Code or Company policies and procedures or concerns about suspected improper business practices is encouraged. Our goal is that all employees, when seeking answers to questions or reporting potential instances of policy violations, should know to whom to turn for a meaningful response and should be able to do so without fear of retribution. To that end, we have adopted principles regarding confidentiality and the prohibition of retaliation as outlined in our Code. We will not tolerate any retaliation against any employee who, in good faith, asks questions, makes a report of activity that may be inconsistent with our Code, our policies or the law or who assists in an investigation of suspected wrongdoing.

Employees are expected to report suspected violations of Company policy by contacting their Manager, the Legal Department, Human Resources, the Compliance Department, or via the Intra-Cellular Compliance Hotline. Employees may choose to remain anonymous where allowed by local law. All reports will be treated equally whether they are submitted anonymously or not. Reports can be made:

- By phone at 866-865-9483
- Via email at INTY@openboard.info
- Via the Compliance Hotline Internet at www.openboard.info/INTY

Monitoring and Auditing

Our Compliance Program includes monitoring, auditing, and evaluating adherence to the Company's Compliance policies. The nature and frequency of our reviews vary and are based on new regulatory requirements, evolving industry standards, changes in business practices, and other risk-related considerations.

Responding to Potential Violations and Corrective Action

Our Compliance Program strives to ensure that the consequences of violating the law or Company policy are clearly understood and that appropriate, consistent disciplinary action is enforced. As such, our Compliance Program requires the Company to evaluate each case and reasonably respond to potential violations of law or Company policy, take appropriate disciplinary action, assess whether the violation is in part due to gaps in our policies, practices, or internal controls, and take appropriate action to prevent future violations.