

**DESCRIPTION OF AMENDMENTS TO
VIKING THERAPEUTICS, INC. CODE OF CONDUCT AND ETHICS
DECEMBER 2023**

On December 12, 2023, the Board of Directors of Viking Therapeutics, Inc. (“*Viking*”) approved a revised Code of Conduct and Ethics (as revised, the “*Code*”) that amended and restated Viking’s prior Code of Conduct and Ethics (the “*Prior Code*”). The Code supersedes the Prior Code.

None of the amendments reflected in the Code constituted or effected a waiver of any provision of the Prior Code applicable to Viking’s principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions.

The following is a summary overview of the material amendments to the Prior Code, as set forth in the Code:

1. Legal Compliance

The Prior Code has been expanded to include a list of specific legal and regulatory requirements applicable to employees’ business units and areas of responsibility that Viking expects employees to understand.

2. International Business Laws

The Prior Code has been amended to expand the discussions regarding U.S. Sanctions and U.S. Export Controls.

3. Antitrust

The Prior Code has been amended to expand the list of certain kinds of information that should not be exchanged with competitors.

4. Conflicts of Interest

The Prior Code has been amended to:

- clarify that a conflict of interest exists when an employee’s loyalties or actions are divided between Viking’s interests and those of the employee or another, such as a competitor, supplier or customer;
- include a note that nothing in the Code (or in any other Viking document or policy) limits the rights of employees to (i) communicate about pay, hours or other terms of employment or working conditions or (ii) communicate with a government agency or official regarding these topics or any violation of law; and
- expand the discussions regarding situations that may involve problematic conflicts of interests for employees during their employment with Viking.

5. Treatment with Fairness and Respect for Dignity of Others

The Prior Code has been amended to:

- expand the list of examples of unlawful discrimination that Viking does not tolerate;
- provide that each person, at every level of the organization, must comply with the “Equal Employment Opportunity, Reasonable Accommodations, and Other Protected Accommodations Policy” and the “Policy Against Discrimination, Harassment, and Retaliation” set forth in Viking’s Employee Handbook and act with respect for the dignity of customers, co-workers and outside firms; and
- expand the discussion regarding compliance with the “Drug-Free Workplace” policy set forth in Viking’s Employee Handbook.

6. Maintenance of Corporate Books, Records, Documents and Accounts; Financial Integrity; Public Reporting

The Prior Code has been amended to add that no employee, director or person acting under their direction may coerce, manipulate, mislead or fraudulently influence Viking’s finance department, its independent registered public accounting firm or its legal counsel.

7. Retention of Business Records; Personal Data and Patient Information

The Prior Code has been amended to include discussions regarding personal data and patient information, including the following:

- Viking is accountable for protecting personal data and for only using that data in accordance with Viking’s policies and procedures, and applicable laws and regulations;
- patient information must not be accessed, removed, discussed with or disclosed to unauthorized persons, either within or outside Viking, without proper consent;
- all individuals having access to confidential patient information are bound by strict ethical and legal restrictions on the release of medical data;
- no individual therefore may disclose to a third party, including his/her own family, information learned from medical records, patient accounts, management information systems or any other confidential sources during the course of his/her work;
- no individual may access confidential patient information which they do not have a “need to know” to carry out their job duties; and
- individuals may not access, release or discuss the medical information of others without proper consent, unless the individual must do so to carry out specific assigned job functions.

8. Political and Charitable Contributions

The Prior Code has been amended to include discussions regarding charitable contributions, including the following:

- Viking supports community development throughout the world;
- Viking team members may contribute to these efforts, or may choose to contribute to organizations of their own choice in their personal capacity and on their own time;
- however, as with political activities, employees may not use Viking resources to personally support charitable or other non-profit institutions not specifically sanctioned or supported by Viking; and
- employees should consult with Viking's Compliance Officer if they have questions about permissible uses of Viking resources.

9. Confidentiality

The Prior Code has been amended to:

- expand the list of examples of "Confidential Information" (as defined in the Employee Confidential Information and Invention Assignment Agreement);
- (i) expand the list of examples of materials, technology and systems that contain or transmit Confidential Information and (ii) provide that such materials, technology and systems that contain or transmit Confidential Information should be subject to appropriate password/login protections, used with privacy shields as needed in public and stored securely; and
- clarify that all Viking's emails, voicemails and other communications are presumed confidential for business-related purposes (not when used for non-business purposes, such as sending or receiving personal emails, etc.) and should not be forwarded or otherwise disseminated outside of Viking, except where required for legitimate business purposes to persons permitted to receive them.

10. Viking's Statements to Media /Public Discussions

The Prior Code has been amended to:

- clarify the rationale behind Viking's policy to disclose material information on behalf of Viking to the public only through specific limited channels; and
- provide that any employee (i) asked to speak for or on behalf of Viking by any outside source should immediately contact the appropriate Viking official and (ii) contacted by a representative from any media organization (e.g., online, television, radio or newspaper reporters) to speak for or on behalf of Viking, and regardless of whether that contact is by email, social media, phone, in person or any other method, should notify the media representative that the employee is not authorized to make a public comment on behalf of Viking and immediately refer the media representative to one of the Viking designees.

11. Compliance Standards and Procedures

The Prior Code has been amended to:

- provide additional procedures for reporting existing or potential violations of the Code or any law, rule, regulation or Viking Policy;
- emphasize that nothing in the Viking reporting requirements limits the right of employees to communicate with a government agency or official regarding these topics or any suspected violation of law or to exercise other legal rights, as stated in Section 24 (“Protected Rights”) of the Code;
- clarify that any person involved in an investigation of possible misconduct is expected to fully cooperate in such investigation and may be asked to maintain confidentiality in the course of such investigation, subject to the protected rights as described in Section 24 (“Protected Rights”) of the Code; and
- provide that (i) Viking will not tolerate any retaliation against any employee or applicant for raising, in good faith, a concern regarding a suspected violation of the Code or of a law, rule or regulation and (ii) (1) any person who participates in retaliatory conduct will be subject to disciplinary action up to and including, as applicable, termination of the employment relationship or removal from Viking’s Board of Directors and (2) misusing the Code by knowingly or recklessly providing false information to Viking, or knowingly failing to disclose requested or material information, may also result in appropriate disciplinary action.

12. Protected Rights

A new, separate section has been added to the Prior Code to provide that nothing in the Code (or in any other Viking policy, agreement or requirement) limits the right of employees to (i) communicate about pay, hours or other terms of employment or working conditions, (ii) communicate with a government agency or official regarding these topics or any suspected violation of law or (iii) discuss or disclose information about suspected unlawful acts in the workplace, such as harassment or discrimination or any other conduct they have reason to believe is unlawful.

The foregoing summary of the material amendments to the Prior Code does not purport to be complete and is qualified in its entirety by reference to the full text of the Code, as may be amended or restated from time to time, which is available on Viking’s website at <http://ir.vikingtherapeutics.com/download/Viking-Code-of-Conduct-and-Ethics.pdf>.