

IMMUNE DESIGN CORP.

PROCEDURES FOR RECEIVING AND HANDLING CONCERNS AND COMPLAINTS REGARDING ACCOUNTING AND AUDITING MATTERS ("WHISTLEBLOWER POLICY")

Immune Design Corp. (the "**Company**") endeavors to comply with all applicable laws, regulations and rules relating to accounting, internal accounting controls and auditing matters. All employees are responsible for ensuring that the Company achieves that objective. Any deviation from such laws, regulations or rules is extremely serious misconduct and may result in discipline, up to and including discharge. Such deviations may also subject the person(s) responsible to personal legal and financial liability, and in certain cases may be a criminal offense.

To assist the Company in ensuring compliance with laws, regulations and rules relating to accounting and auditing matters, the Audit Committee (the "**Committee**") and the Nominating and Corporate Governance Committee of the Board of Directors of the Company (the "**Board**") has established these procedures for: (1) the confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters; and (2) the receipt, retention and treatment of complaints received by the Company regarding accounting, internal accounting controls or auditing matters. The Company encourages employees to report possible questionable accounting or auditing practices in a form that is as clear and specific as possible under the circumstances, including through the submission of relevant records, if available. However, the Company neither requires nor encourages employees to investigate personally questionable accounting or auditing practices on their own, because of the potential that such a private investigation might compromise the Company's own investigation, result in the loss or tainting of evidence, or otherwise prevent an effective and fair investigation into the underlying facts.

These procedures apply only to complaints regarding accounting, internal accounting controls, or auditing matters and do not apply with respect to any other grievance or complaint, including harassment or discrimination, issues relating to any employee's general working conditions, or other matters, which should be reported and handled in accordance with other procedures and guidelines implemented by the Company from time to time and set forth in the Company's Code of Business Conduct and Ethics.

A. Submission of Confidential and Anonymous Concerns by Employees

In an effort to foster an environment where employees feel free to voice their concerns, the Company has established procedures for the confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters. Any employee who believes that he or she possesses any information relating to questionable accounting or auditing matters should submit such concerns in writing to the Committee at the following address:

Franklin Berger
Chairperson of the Audit Committee
Immune Design Corp.
1616 Eastlake Ave. E., Suite 310
Seattle, WA 98102

or, through the Ethics Hotline as follows:

Email: IMDZ@openboard.info
Phone: 1-866-865-9477
Web: <http://www.openboard.info/IMDZ/>

B. Complaints Received Outside of the Confidential and Anonymous Submission Process

If a complaint regarding accounting, internal accounting controls, or auditing matters is brought to the attention of an executive officer of the Company, either by a Company employee or a third party, the executive officer shall report such complaint directly to the Chairperson of the Committee. If a complaint regarding accounting, internal accounting controls, or auditing matters is brought to the attention of a non-executive employee of the Company, such employee shall either (1) report such complaint directly to his or her supervisor or the General Counsel of the Company or (2) through the submission procedures set forth in Section A above.

C. Scope of Matters Covered by these Procedures

These procedures relate to employee complaints or concerns regarding any accounting and auditing matters, including the following:

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

Complaints or concerns relating to harassment or discrimination, an employee's general working conditions or other matters should be reported and handled in accordance with the procedures and guidelines implemented by the Company as set forth in the Company's Code of Business Conduct and Ethics.

D. Procedures for the Handling of Concerns and Complaints Regarding Accounting and Auditing Matters

1. **Receipt of Complaint.** Upon receiving a concern or complaint pursuant to these procedures, the Chairperson of the Committee will, depending upon the apparent urgency of the matter, call a meeting of the Committee or add the concern or complaint to the agenda for discussion at the next regularly scheduled Committee meeting.

2. **Review of Complaint by Committee.** The Committee or its designee shall review every potential concern or complaint reported pursuant to these procedures to determine whether the concern or complaint raises, or may raise, a material concern about accounting, internal accounting controls or auditing matters, and whether the concern or complaint is sufficiently detailed and/or supported by facts or evidence to permit the conduct of an investigation. In conducting this review, the Committee may require the attendance at the meeting of the Chief Financial Officer (or functional equivalent), the independent auditor, and/or the person submitting the concern or complaint and such other persons as it deems necessary or appropriate.

3. **Review by Chief Financial Officer.** The Committee will request the Chief Financial Officer (or functional equivalent) to review concerns or complaints received pursuant to these procedures that the Committee determines not to be material, and the Chief Financial Officer (or functional equivalent) shall report his or her findings and recommendations, if any, to the Chairperson of the Committee.

4. **Investigation.** The Committee or its designee will investigate concerns or complaints received pursuant to these procedures that raise, or may raise, a material concern about an accounting or auditing matter, and that are sufficiently detailed and/or supported by facts or evidence to permit the conduct of an investigation. Where a concern or complaint appears to relate to a material accounting or auditing matter but is not sufficiently detailed and/or supported by facts or evidence to permit the conduct of an investigation, the Committee or its designee shall engage in a reasonable effort to obtain sufficient detail and/or factual support to permit an investigation to proceed. In connection with any investigation, the Committee may, to the extent it deems necessary or appropriate, retain and consult with independent accounting or legal counsel. To the extent possible, any such investigation will be handled in confidence. However, given the nature and seriousness of the issues that may arise in the course of such an investigation, the Company cannot guarantee anonymity to persons who participate in any investigation.

5. **Action Following Investigation.** Following the investigation of each concern or complaint received pursuant to these procedures that raises a material accounting or auditing matter, the Committee shall review the results of the investigation and shall communicate its findings and recommendations to the Board. The Board shall consider and implement such recommendations, as it deems necessary or appropriate, to address any identified concerns. Such steps may include causing accounting or audit records to be corrected, causing required securities or other disclosures to be amended, and/or ensuring that corrective action, including possible discipline, be imposed on any employee determined to have violated Company policy or any applicable accounting or auditing law, regulation, rule, control or policy.

6. **Record Retention.** The Committee or its designee shall retain copies of every concern or complaint received pursuant to these procedures, and related investigatory records, for no less than 5 years following the conclusion of the investigation.

E. No Retaliation

The Company will not tolerate retaliation against any individual who in good faith submits a concern or complaint or participates in any investigation conducted pursuant to these procedures. Any suspected retaliation should be reported immediately to the Committee, General Counsel, head of Internal Audit or the Chief Financial Officer (or functional equivalent). Such retaliation is extremely serious misconduct and may result in discipline, up to and including discharge of the person(s) engaging in any retaliatory actions. Retaliation may also subject the person(s) responsible to personal legal and financial liability, and in certain cases may be a criminal offense. Any individual who submits a concern or complaint, or participates in any investigation conducted pursuant to these procedures, in bad faith will be considered to be in violation of Company policy.

F. Questions

Questions or concerns regarding these procedures should be addressed to the Company's Chief Financial Officer (or functional equivalent) or General Counsel.

G. Review

These complaint procedures will be subject to the periodic review of the Committee. Any proposed changes to these procedures will be, upon recommendation of the Committee, reviewed and approved by the full Board.

Effective April 22, 2014

Amended March 17, 2016