

Apellis

CODE OF
CONDUCT

Apellis - Code of Conduct	1
<hr/>	
We Care	
<hr/>	
We Care Message	3
<hr/>	
Life at Apellis	4
<hr/>	
Equal Employment Opportunity	5
<hr/>	
Diversity & Inclusion	6
<hr/>	
Anti-Discrimination & Harassment	7
<hr/>	
Workplace Policies	8
<hr/>	
Health & Safety	9
<hr/>	
We Are Resourceful	
<hr/>	
Anti-Bribery & Anti-Corruption (ABAC)	11
<hr/>	
Antitrust & Competition Laws	12
<hr/>	
International Trade Controls & Compliance	13
<hr/>	
Interactions with HCPs & Healthcare Organizations	14
<hr/>	
Product Quality & Adverse Events	15
<hr/>	
Insider Trading	16
<hr/>	
We Are Fearless	
<hr/>	
Scientific Integrity	18
<hr/>	
Ethical Research & Research Transparency	19
<hr/>	
Political Contributions & Activities	20
<hr/>	
Grants & Other Third-Party Support	21
<hr/>	
Personal Use of Company Resources	22
<hr/>	
Our Responsibility	23
<hr/>	
Social Media	24
<hr/>	
Conflicts of Interest	25
<hr/>	
Confidential Information & Intellectual Property	26
<hr/>	
Privacy	27
<hr/>	
We Are Complement	
<hr/>	
Recordkeeping & Retention	29
<hr/>	
Fraud	30
<hr/>	
Reporting Suspected Violations of the Code	31
<hr/>	
Disciplinary Actions	32
<hr/>	
Non-Retaliation Policy & Obligation to Report	33
<hr/>	

As a global healthcare company, our business operations are highly regulated and subject to significant scrutiny.

It is important, that all Apellis employees understand and comply with the laws, rules, and regulations that apply to our function, subsidiary, and/or geographic region. Compliance both in letter and in spirit is the foundation upon which this Code is built and the driving force behind how Apellis conducts its business, but more importantly expresses our ethical commitment to patients and their families, health care providers and the community in which we live.

Apellis is committed to meeting or exceeding applicable regulatory authority requirements for current Good Manufacturing, Clinical, Laboratory and Pharmacovigilance Practices (GXP's). Employees who conduct or oversee cGXP-related activities on behalf of the Apellis are expected to be familiar with and to comply with all applicable regulatory guidelines that apply to these operations.

All Apellis employees are required to adhere to company policies and procedures relevant to their business activities. While the Code is the foundation that sets forth the fundamental principles upon which our policies, procedures, and related guidance have been developed, each resource is a complement to the others, and each should be reviewed and understood.

Compliance with our Code is central to your responsibility as an Apellis employee. It is important that you take the time to carefully review our Code and gain a full appreciation of Apellis' expectation that you will observe the highest standards of ethical, moral, and professional conduct in all aspects of your activities. Failure to comply with the Code may result in disciplinary consequences, up to and including termination for cause.

While our Code and our policies and procedures set forth standards of conduct that apply in many commonly encountered situations, you are still expected to use your best judgment and to uphold our principles at all times. Please be aware that more detailed policies may be applicable to specific situations. If you have any questions about the appropriate course of action in any situation, please discuss your concerns with your management, HR, compliance or the legal department.

By upholding the tenets of the Code every day, we can focus on the positive aspects of developing groundbreaking treatments for patients.

LIFE AT APELLIS

Here at Apellis, we do things the right way. We stand for the utmost in quality of work, always, and we exercise care in every communication, every action we take.

This Code outlines the standards we hold at the forefront – and it's these standards which make us Apellis employees. While this Code sets forth the basics, there is no substitute for authentic dialogue at all levels of the organization – among peers, with supervisors and senior management, and if needed with HR, legal or ethics & compliance. All of us are invested in getting it right, and it's better to resolve issues through good communication through the organization.

EQUAL EMPLOYMENT OPPORTUNITY

The decisions we make with regard to employment are based on knowledge, skills, and impact.

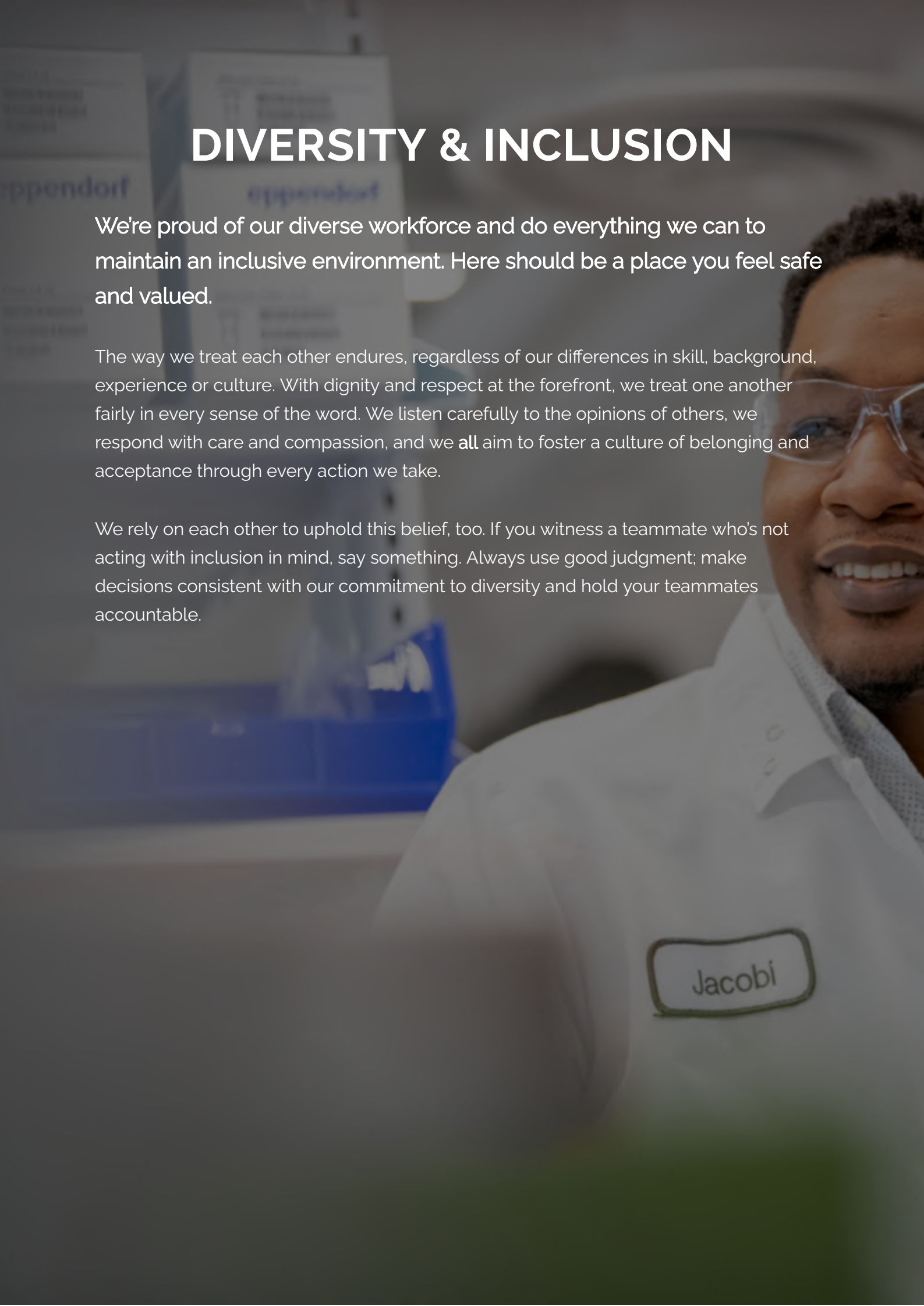
Apellis is proudly committed to being an equal opportunity employer, where the opportunity to progress and advance are made free of discrimination on the basis of race, color, religion, sex, national origin, age, disability, familial status, sexual orientation, or any other characteristic. We hire, develop, evaluate and promote Apellis employees based on merit, suitability for the role and potential development. Apellis is mindful to avoid perceptions of favoritism or misuse of authority. In every decision, sound judgment is exercised to avoid potential or actual conflicts of interest.

DIVERSITY & INCLUSION

We're proud of our diverse workforce and do everything we can to maintain an inclusive environment. Here should be a place you feel safe and valued.

The way we treat each other endures, regardless of our differences in skill, background, experience or culture. With dignity and respect at the forefront, we treat one another fairly in every sense of the word. We listen carefully to the opinions of others, we respond with care and compassion, and we **all** aim to foster a culture of belonging and acceptance through every action we take.

We rely on each other to uphold this belief, too. If you witness a teammate who's not acting with inclusion in mind, say something. Always use good judgment; make decisions consistent with our commitment to diversity and hold your teammates accountable.



Jacobi

ANTI-DISCRIMINATION & HARASSMENT

Our job is to make sure you're able to show up as your best self and do your best work.

A respectful working environment is an important factor in doing so. With that in mind, we're committed to a workplace free of harassment or discrimination in any form. All Apellis employees, contractors and suppliers are treated with respect and professionalism.

From the top down, all team members, including contractors and suppliers, have a responsibility to abide by this policy to support an environment fostering mutual respect and integrity.

Harassment or discrimination based upon an individual's race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, age, disability and genetic information, will be tolerated under no circumstances.

Harassment can present itself in different forms, including but not limited to:

- Physical activities, which may include but are not limited to touching, blocking someone's path, standing too close to someone or initiating unwanted physical contact;
- Verbal activities, which may include but are not limited to comments regarding appearance or attire, comments intended to intimidate or demean, or sexually explicit comments;
- Visual activities, which may include but are not limited to displaying inappropriate or obscene photos, posters or cartoons.

Apellis is also committed to ensuring that all necessary accommodations are made for qualified teammates with disabilities, in accordance with the law.

A woman with long brown hair, wearing a white lab coat and clear safety glasses, is looking upwards and to the right. The background is a blurred laboratory setting with white equipment and a blue object on the left. The text is overlaid on the left side of the image.

WORKPLACE POLICIES

There are certain policies we've put in place – to keep the wheels turning, as it were, and ensure we're on track to success. Learn more about our workplace policies in this next section.

HEALTH & SAFETY

Apellis is committed to providing a healthy and safe workplace for all teammates, contractors and guests.

The necessary precautions will be taken by Apellis to maintain a safe and healthy workplace. This commitment extends to maintaining facilities and premises in compliance with all applicable health and safety laws and regulations, as well as prohibiting the use of illegal labor (e.g. abusive labor or human trafficking) by teammates or suppliers.

Even with Apellis' commitments, all Apellis employees play a role in maintaining a safe workplace.

Violence of any kind is not permitted, whether by or towards an Apellis team member, contractor or guest.

There should be no deadly weapons brought to Apellis' premises, and we ask you to report any incident of violence immediately. This applies to actual company premises (including facilities, common areas and parking lots) or at a company event.

In line with our wanting to keep you safe at work, we don't tolerate members of our team coming to work under the influence of alcohol and/or drugs. That includes while operating a company vehicle, even if off-site.

Please be aware that additional policies may cover specific workplace situations. Again, we encourage you to use your best judgment at all times.

ANTI-BRIBERY & ANTI-CORRUPTION (ABAC)

We take a zero-tolerance approach to bribery, kickbacks, and corruption.

Apellis is committed to conducting its business fairly and with integrity. Bribery and corruption can appear in many forms and situations – whether it be with a Healthcare Professional, Government Official, private individual or entity, or directly through a third party. A bribe occurs when a person offers or pays anything of value to any person or company in order to improperly gain a competitive advantage.

- At no time may an Apellis employee or anyone else acting on Apellis' behalf:
 - offer,
 - promise,
 - give, or
 - receive money or anything else of value with the intent of improperly influencing the judgment or behavior of another or themselves.
- The majority of countries have laws forbidding making payments to certain persons/entities in order to improperly influence them or gain an unfair advantage.

Examples of impermissible payments, gifts, and other incentives include:

- Cash or cash equivalents;
- Personal gifts;
- Lavish meals;
- Recreation;
- Entertainment; and
- Sham or excessive consulting arrangements (such as those that are beyond the legitimate need or that involve payments that do not reflect fair market value).

Business courtesies, such as nominal gifts, should generally **not** be offered or accepted. That being said, some exceptions to this rule may apply in specific circumstances. For example, business courtesies to private sector, commercial business associates may sometimes be accepted or offered if they are:

- Clearly permissible under applicable laws, regulations, and relevant policies;
- Infrequent;
- Reasonable and modest in nature;
- Not given or received, and could not be viewed by a reasonable person as given or received, with any expectation or obligation; and
- Compatible with industry standards and local customs.

Healthcare Professionals

As part of appropriate business interactions, described in the “Interactions with Healthcare Professionals and Healthcare Organizations” section of this Code, the following activities with **HCPs** may be allowed when conducted in accordance with Apellis policies and procedures, if permitted by local laws and regulations (note that additional restrictions apply to government officials and institutions):

- **Educational items** designed primarily for the education of patients or HCPs that do not have value to the HCP outside of their professional responsibilities may be appropriately provided, if these items have been approved using the company's internal review process; and
- **Modest Meals** may be provided in conjunction with certain types of events, such as educational discussions or programs, to the extent that they are provided in compliance with applicable company policies.

U.S. Government Officials

Various laws and regulations limit or prohibit what federal, state, and local government-elected and appointed officials and other government employees may accept from companies and individuals. No gifts or items of value, including meals or business courtesies, should be given to a U.S. public official without confirming in advance with the Legal team that the gift is permitted by law.

Government Officials Outside of the U.S.

Apellis employees, including employees, officers, directors, and agents, are prohibited from offering, authorizing, promising, paying, or giving, directly or indirectly, anything of value to foreign government officials or public employees in an effort to obtain or retain business or to secure any improper business advantage. Note:

- **Anything of value** refers to anything (such as goods, services, or opportunities) that has value to the recipient or the recipient's family member or friends; and
- **Foreign government officials and public employees** may include employees of state-owned or state-controlled companies or institutions, such as hospitals and universities. This means that many of the HCPs Apellis employees interact with outside the U.S. are foreign government officials and public employees. In addition, candidates for political office and political parties also come under this definition.

Apellis only works with business partners who share our commitment to conducting business ethically and free from bribery and corruption. For that reason, it couldn't be more important to carefully review and attend to third party relationships (such as distributors, consultants, and contractors) and set a clear expectation that bribery and corruption are unacceptable under any circumstance.

The ABAC policy can be found [here](#).

ANTITRUST & COMPETITION LAWS

Antitrust and competition laws protect free enterprise by preventing companies from entering into anti-competitive agreement with competitors or abusing a dominant market position.

The antitrust and competition laws are enacted to warrant businesses compete in accordance to quality, service, and price. Apellis is committed to fair and open competition and business dealings; prohibiting agreements that restrict free enterprise in any of the countries that we operate.

Apellis only collects and uses business information about other companies in a manner that is ethical, lawful, and meets confidentiality obligations.

We **do not** permit direct or indirect discussions or contacts:

- About pricing, terms or conditions of sale or other competitively sensitive information with competitors
- Which unfairly restrict trade with suppliers and customers
- Which exclude competitors from the marketplace

We **do not** permit:

- Allocation of markets or customers with competitors
- Engaging in the boycott of customers or suppliers
- The use, by an Apellis employee or third-party, of unlawful or unethical means to gather information about our competitors.

Antitrust and competition laws are complex and vary from country to country. Please consult with Legal before interacting with competitors or engaging in business activities that could potentially could unfairly restrict trade.

INTERNATIONAL TRADE CONTROLS & COMPLIANCE

Each Apellis employee has the responsibility for ensuring trade compliance in connection with company operations including but not limited to dealings with affiliates, consultants, and agents outside of the USA. We are committed to complying with all import, export, and other trade compliance laws and regulations of all countries where we conduct business.

Export control restrictions apply not only to international shipments of physical materials and equipment, but also to the transfer of technical data across national borders or to citizens of those countries. Apellis employees should collect all required information about the proposed export transfer, including:

- What is being transferred,
- By what means the data can be used,
- Where data is being transferred, and
- Who is receiving or purchasing the information.

Failure to comply with international trade regulations may subject Apellis to substantial penalties, fines, denial of exporting privileges, and even criminal prosecution.

Additionally, failure to comply with international trade regulations may subject individual Apellis employees to disciplinary action and/or termination.

Import and export laws are complex and subject to change based on global developments. Questions concerning whether a proposed sale, shipment, or transfer of technology, domestic or international, complies with export control or import laws should be referred to Legal.

Compliance with import/export laws also extends to trade restrictions and anti-boycott laws of the USA and other countries. We expect that our business partners will adhere to any and all applicable laws as well. Apellis employees should make sure that they are aware and comply with the laws and applicable policies when engaging in an international transaction or releasing certain types of technical data or information to a Non-USA person.

USA and other country laws also contain prohibitions against dealing with specifically identified countries, persons or organizations, including those countries where the USA enforces economic and trade sanctions (e.g. Crimea region, Cuba, Iran, North Korea, Sudan, Syria, among others).

Apellis employees are to:

- Not cooperate in illegal trade boycotts.
- Be alert for language relating to illegal boycotts in standard business communications (e.g. customer emails, requests for proposals, trade documents, purchase orders and contracts, etc).
- Contact Legal immediately if in receipt of a request for information about a boycotted, sanctioned, country or 'blacklisted' company.

INTERACTIONS WITH HCPS & HEALTHCARE ORGANIZATIONS

We've built, and will continue to build, our name and reputation on doing business with honesty and integrity at the heart of every interaction.

When dealing with Health Care Professionals (HCPs) and/or Healthcare Organizations (HCOs), we're committed to the appropriate use of our products, and engage in a variety of promotional and educational activities designed to provide HCPs and HCOs with the information they need to make fully informed prescribing decisions.

As necessary, we may also engage qualified HCPs to assist in our clinical research, as advisors, consultants, or educators. In doing so, employees abide by professional standards in applicable industry codes of conduct, such as the PhRMA Code on Interactions with Health Care Professionals, our company policies, and all applicable laws and regulations.

For the purposes of our Code, Apellis defines HCP and HCO as:

- **HCP:** Any person or entity that interacts directly with patients for the diagnosis or treatment of the patient, and is licensed to prescribe drugs for medical use, or is in a position to arrange for or recommend the purchase or prescription or formulary placement of any company product. This includes, but is not limited to, physicians, nurses, physician's assistants, nurse practitioners, and pharmacists that are actively practicing.
- **HCO:** Hospitals, clinics, medical practices, universities, pharmacies, professional organizations, medical societies, payors, distributors/wholesalers, specialty pharmacies, and other entities in a position to arrange for or recommend the purchase or prescription or formulary placement of any company product.

All interactions and communications with HCPs and HCOs that involve promoting Apellis products, providing scientific and educational information, and/or supporting medical education must be conducted in a manner that is fair and balanced, scientifically rigorous, and compliant with applicable laws and regulations. As we provide information through various channels, it is critical that interactions and communications are approved through designated processes, fully conform to the applicable approved product labeling, and meet the highest professional, marketing, and promotional standards.

When Apellis engages HCPs as consultants, advisers, educators, or to provide other services, the company must have a legitimate business need for the service sought and require the skills or experience of the particular HCP(s) engaged. All service arrangements must be documented in a written agreement and, where payment is required, ensure that it reflects a reasonable fee consistent with fair market value.

For a more exhaustive look, view the full policies [here](#).

PRODUCT QUALITY & ADVERSE EVENTS

Product quality is at the heart of what we do, simply put.

We comply with all laws and regulations and have a robust process in place for handling any adverse events or quality complaints which arise from use of our products. If anything is brought to your attention, regarding either the product itself or an adverse effect that's been experienced by a user, you must report it within 24 hours.

Apellis is committed to maintaining an accurate risk-to-benefit profile for each Apellis product when used consistent with product labeling.

What is an Adverse Event ("AE")?

- Adverse events are any untoward medical occurrence associated with the use of a drug or device, whether or not considered product-related.

What is a Serious Adverse Event ("SAE")?

- An adverse event or suspected adverse reaction is considered "serious" if, in the view of either the investigator or sponsor, the events results in any of the following outcomes:
 - Death;
 - A life-threatening adverse event;
 - Inpatient hospitalization or prolongation of existing hospitalization;
 - A persistent or significant incapacity or substantial disruption of the ability to conduct normal life functions; or
 - A congenital anomaly/birth defect.

What is a Product Quality Complaint ("PQC")?

- A product quality complaint is any written, electronic or oral communication regarding manufacturing or packaging-related complaints related to the identity, quality, durability, reliability, safety, effectiveness, or performance of an Apellis drug product, after it is released for distribution to market or clinician.
 - Examples:
 - Product with an unexpected color, appearance, or particles is defined as any written.
 - Missing or illegible labeling
 - Inability of a customer to administer the product or the product did not work as intended

Please report any AE and/or PQCs to medinfo@apellis.com or complaints@apellis.com.

INSIDER TRADING

Our Insider Trading policy has been put in place to make sure that all insider trading is done legally and properly.

What this means is ensuring that no buying or selling of stock is done by or for someone who has 'inside knowledge' or tips which unfairly influence their decisions. Apellis employees don't use material non-public information to improperly benefit ourselves or others – this applies at all times.

The simplest rule is to not talk about Apellis information with anyone other than Apellis employees or authorized contractors/consultants – not even family or close friends.

If you have any questions about whether information is confidential or non-public, or whether you are allowed to disclose information or trade Apellis securities, please ask the General Counsel.

Violating company policies on confidentiality and insider trading will result in disciplinary action, including termination for cause, and may expose the employee and Apellis to serious civil and criminal penalties.

The civil and criminal penalties can be severe, including significant fines and prison time.

Insider trading does not apply to:

- Exercising stock options for cash granted under our equity incentive plans. However, selling any shares issued on the exercise of these stock options or any cashless exercise of these stock options is restricted.
- Purchases or sales made pursuant to a **pre-existing** arrangement under Rule 10b5-1 trading plan.
- Investing in Apellis stock in the company's 401(k) plan. However, changing your investment election regarding Apellis stock is restricted.
- Buying Apellis stock through the company's Employee Stock Purchase Plan. However, changing your elections under the ESPP and selling Apellis stock acquired under the ESPP is restricted.

SCIENTIFIC INTEGRITY

Apellis is a patient-centric organization.

We have the highest respect for the patients who choose to participate in our clinical trials to help us deliver medicines of the highest quality to people who need them. We're committed to ensuring their safety, health and well-being, and to having the highest ethical, scientific and clinical standards in all of our research endeavors.

Apellis complies with all laws, regulations and cultures of the countries in which our studies are conducted relating to our clinical trials and our treatment of volunteers. We also ensure that we continue to meet global expectations on how we treat patients participating in our studies.

Apellis is committed to engaging in appropriate scientific exchange concerning research pipelines, marketed products, and relevant disease states.

ETHICAL RESEARCH & RESEARCH TRANSPARENCY

When it comes to the research and development initiatives we undertake, ethics are at the forefront – period.

Our ethical, scientific and safety standards are of the highest measure, complying with all laws, guidelines and industry codes at all times.

All proposals for clinical trials and research grants go through an extensive review, to make sure they meet both our explicit internal standards as well as external laws and regulations. We keep our research subjects safe as best we can, and we obtain fully informed consent, always.

Apellis is also aware that in doing what we do, we shoulder a heavy moral responsibility when it comes to the humane treatment of animals. We're consistently prioritize advancing alternatives to animal research.

POLITICAL CONTRIBUTIONS & ACTIVITIES

As a member of a highly regulated and publicly visible industry, Apellis may be affected by various political initiatives.

For that reason, we may from time to time express our views as a company or become engaged on national and local issues.

Apellis employees who are not specifically authorized to engage in political or lobbying activities may not make loans, donations, contributions, or payments to a political party, candidate, or political action committee on behalf of the company or our affiliates, nor may Apellis employees cause the company to reimburse others who provide such support.

Outside of the workplace, Apellis employees are not prohibited from engaging in political or advocacy activities as private citizens, in a personal capacity, as long as the actions are exclusively on your own time and behalf and are not otherwise prohibited by company policy.

GRANTS & OTHER THIRD-PARTY SUPPORT

Apellis may provide financial and/or in-kind support for a variety of bona fide third-party activities, including medical education grants, charitable contributions, and donations that provide value to the community.

We do not provide such support or funding to influence or reward any recipient for present, past, or future support of Apellis or recommendation, referral, purchase, or use of its products.

To ensure compliance with this principle and all relevant rules, all requests for support of grants, charitable contributions, as well as any sponsorship and membership funding that provides the company with tangible business benefits, must be submitted for evaluation and approval in accordance with Apellis' external funding policies and procedures. Designated company personnel review the content and substance of each request on its individual merits, with no consideration of a prospective recipient's ability to purchase, refer, use, or recommend any Apellis product, or of the volume of any past business.

All activities funded by medical education grants and charitable contributions are conducted independent of Apellis' influence. For this reason, the organizers of the activity should have full responsibility and control over the content, faculty or speakers, venue, and other aspects of the program.

USE OF COMPANY RESOURCES

Company resources are to be primarily used for work purposes only.

Apellis employees must use company resources – both physical and technology – as they are intended within their job responsibility scope. These resources include, but are not limited to, office facilities, equipment, computer hardware, software, and company data.

Apellis employees are to use software authorized by the Apellis Information Technology team and may not make any unauthorized changes to Apellis-provided computer hardware or software.

Apellis employees are responsible for reporting the loss or theft of company resources to IT and Privacy. Loss of resources can include the permanent or temporary physical loss of property, loss of Apellis data by transmission to an incorrect or unapproved party, or the compromise of your Apellis credentials.



OUR RESPONSIBILITY

We take pride in the way that we represent Apellis to the rest of the world.

SOCIAL MEDIA

Social media is an incredible tool, but one to be used carefully and with great consideration.

Everything you do online should reflect all of the Apellis company policies we uphold, and these policies apply to your conduct inside of and outside of the office. Regardless of which social media platform is being used, inclusive of blogs and on-line forums, each Apellis employee has the responsibility to not give the impression they are speaking on behalf of Apellis, unless they have authorization to do so.

We ask that each Apellis employee uses good judgement, whether engaging via your own personal profile or company-related social media. But what exactly does "good judgement" look like or mean?

- Be accurate, truthful, and respectful
- Never mention product names (brand or generic) of approved or investigational compounds
- Protect confidential information
- Avoid giving the impression that you are speaking on behalf of Apellis as a company
- Report information concerning adverse events and product complaints

Code of Conduct sections detailing anti-discrimination and harassment, confidential information and intellectual property apply to social media activities as well.

It's important that you familiarize yourself with all of the above, **and** with our full Social Media policy. [Click here](#) to view it in full. If you have any questions, please contact Corporate Communications.

CONFLICTS OF INTEREST

As a member of the Apellis family, our interests lie right here.

Everything we do is for the betterment of the company, and we actively avoid situations, actions and activities considered to be a "conflict of interest". Apellis employees only act and engage in such activities if they are agreed with Apellis and transparently disclosed.

Conflicts of interest may exist when a person's private interest competes with their professional duties and either appears to, or actually does, influence their ability to objectively perform a duty for the company. Apellis employees are strictly prohibited from engaging in any activity that may result in such a conflict of interest with the company. While many types of potential conflicts are described below, you should always discuss with your manager or seek guidance from the Legal or Compliance team if you are unsure about your individual situation, or to seek a written exception if necessary.

Apellis employees must seek to avoid situations that could lead to **even the appearance** of a conflict of interest. To prevent these situations from developing, you should be aware of circumstances that give rise to them. Perceived or actual conflicts of interest can happen when a transaction or activity:

- Is contrary to the best interest of Apellis;
- Potentially could or actually does result in personal and private gain or benefit;
- Compromises, or appears to compromise, your ability to make an impartial business decision on behalf of the company; or
- Results in you or your family member receiving personal benefits because of your position in, or as an agent of, the company.

Competing interests can include **anything** that may influence a decision-maker's judgment. Some common conflict of interest situations may exist for Apellis employees including, but not limited to, the following:

- **Financial Interests**

1. Holding a direct or indirect benefit, ownership, or other interest (but excluding a 2% or less interest in a publicly traded stock) in a competitor, vendor, or customer. (This restriction applies to Apellis employees' immediate family as well.)

- **Employment**

1. Providing consulting services for, is employed by, or serve as an officer or director of another company that has a relationship with Apellis, including competitors, vendors, customers, or suppliers.

- **Business and Financial Transactions**
 - Conducting business transactions on behalf of Apellis with an entity that employs an immediate family member unless the arrangement is clearly documented and agreed to in advance by the Legal team.
 - Entering into personal financial transactions with an Apellis employee or representative of a competitor, vendor, or customer.
 - Selling competitive services or products.
- **Corporate Opportunities**
 - Using or disclosing non-public information acquired as a result of employment or a contractual relationship with Apellis.
 - Taking advantage of business opportunities that rightfully belong to Apellis, such as rights to a product or process.
- **Non-Business Activities**
 - Making unauthorized use of the company name, assets, or facilities in a manner that creates or could create the appearance of a company endorsement.
- **Personal Use of Company Property and Information**
 - Using or diverting company property, including services or information, for personal benefit or facilitate activities that are not approved by the company or are unrelated to the business of the company.

Apellis employees may not solicit or accept anything of value from any third party who may be attempting to obtain a business advantage from you or Apellis. Under applicable ABAC laws, we could be held responsible for the actions of third parties engaged to act on our behalf, even if we're unaware of or don't approve of their actions.

You are also not permitted to provide or accept gifts, gratuities or favors from any customer, supplier or other individual seeking to engage in business with Apellis, other than items of insignificant value (less than \$100).

Apellis employees are permitted to provide or accept business entertainment to or from anyone engaging in business with Apellis. However, such entertainment must be infrequent, modest, intended to serve legitimate business goals, and in compliance with all relevant healthcare laws.

You must report all actual and potential conflicts of interest in accordance with the Apellis **Conflicts of Interest** policy.

CONFIDENTIAL INFORMATION & INTELLECTUAL PROPERTY

Confidentiality is key.

We all have a part to play in protecting confidential information, intellectual property, and any other sensitive materials, all of which are important to our continued success and competitiveness.

All Apellis employees, contractors, vendors and business partners are expected to take precautions to protect Apellis assets, which include confidential information and intellectual property. Apellis ensures that confidential information, inclusive of personal information or data, and intellectual property owned, developed, or controlled by Apellis is protected appropriately.

Company resources containing intellectual property and confidential information are only stored in authorized locations. The resources and/or confidential information are only to be shared with a third party for legitimate business purposes, and with appropriate Apellis approvals.

What does “confidential information” include?

This could be anything from sales or product info to those all-important business strategies, research priorities, even pending personnel announcements. Apellis information should only be shared with employees and authorized third parties to receive the information and

Best practices:

- Use confidentiality agreements with third parties
- Avoid discussing Apellis related information in public places (including within the office!)

Be aware of:

- Inadvertent disclosure of confidential information to family and friends

- Curious strangers inquiring about Apellis and its business, clinical trials, management
- Phishing attempts to hack into your email
- Cold calls from the media, investing community

Confidential information includes:

- Scientific research and development, financial, business or technical information
- Clinical trials related information and reports
 - Raw efficacy data and associated read outs, protocol and safety events
 - Statistical analysis, "top-line readout" and draft press releases
- Business and sales strategy
- Employee, customer and supplier lists/details

If you're not sure, keep it to yourself anyway – better safe than sorry!

What is "intellectual property"?

Intellectual property encompasses many things, including copyrights, trademarks, patents, designs, or even trade secrets and inventions we've made mention of.

Neither of the above lists are exhaustive, so err on the side of caution in any instance.

PRIVACY

Data collection of Personal Information (PI) and the use of personal and/or patient data may occur during Apellis' standard research and business activities.

We're committed to complying with national and local laws required to protect Personal and Patient data. This commitment permits a consistent approach to data protection across all Apellis activities.

Each Apellis employee must promptly report an accidental disclosure (shared or received) of personal or patient data to their manager, Privacy and Quality. Failure to promptly report such a disclosure can itself be a violation.

Anyone who intentionally discloses or misuses personal or patient data may face disciplinary action, and potentially civil and criminal penalties.

If you have knowledge of information relating to a security breach or an act that could lead to a security breach (unauthorized access to personal and/or patient data), report the information to IT, Privacy and Quality.

RECORDKEEPING & RETENTION

Our books are kept with explicit detail, fully complete and accurate at all times.

Record keeping is extremely important here, to help us make smart decisions and be able to provide external parties with the information they may need (the government or other regulatory bodies, for instance).

Make sure that any information or records produced by you is done so accurately, with the true nature of the transaction disclosed. Falsifying records or accounts and omitting facts may constitute fraud.

Books, records and accounts may include any documentation of business transactions such as time sheets, bills, invoices, expense reports, contracts, accounting records, laboratory notebooks, and shipping and customs records.

We also retain all records as required to meet legal, tax and regulatory requirements. This record retention requirement not only extends to Apellis employees, but also to the suppliers that we work with. Further to this, we make sure they're disposed of securely when they're no longer needed.

FRAUD

Fraud. You won't be surprised to hear that it's strictly prohibited, at all levels, in any form.

Fraud is described as "a deliberate or deceptive act intended to result in financial or other gain".

Examples of fraud include:

- Dishonest acts;
- Embezzlement;
- Forgery or alteration of negotiable instruments such as checks and drafts;
- Misappropriation of Apellis funds;
- Team member, customer, partner, or supplier assets;
- Unauthorized handling or reporting of Apellis' transactions, and
- Falsification of Apellis records or financial statements for any reason.

REPORTING SUSPECTED VIOLATIONS OF THE CODE

We recognize that issues are not always black and white.

Difficult situations can arise, and we want you to have the resources and guidance you need to navigate them with integrity and support. We mean it when we say that we have an "open door" policy; if you need guidance or have a concern, contact your manager, HR, Legal, Ethics & Compliance, or the Ethics & Compliance Hotline.

The Apellis Ethics & Compliance hotline information:

- Web: <https://apellis.ethicspoint.com>
- Mobile: <https://apellismobile.ethicspoint.com>
- Phone (toll-free):
 - Australia: 1800 518 252
 - France: 0805 22 31 76
 - Germany: 0800 180 2229
 - Ireland: 1800 851 832
 - Italy: 800 725 933
 - Netherlands: 0800 023 1148
 - Switzerland: 0800 001 567
 - UK: 0800 048 5484
 - US: 1 844 782 0340

We each have a duty to report concerns of illegal or unethical conduct – it won't be stood for. Speak to your Manager and, if it's still weighing on your mind after doing so, take it up a notch and speak to someone else in management who you trust.

If you choose to report something to the Apellis Ethics & Compliance Hotline instead, you're free to remain anonymous, where allowed, or identify yourself – that choice is yours. Either way, please provide as much information as possible so we can investigate fully, efficiently and effectively.

To that end: you will **not** be retaliated against for reporting in good faith a concern of potential illegal or unethical conduct. A concern could be regarding the laws we adhere to, the company policies we live by, or simply the Code of Conduct.

Unsure if there's been a violation? Bring it to our attention – you can speak to your manager, HR, Legal or Ethics & Compliance about your concerns, or you can use the anonymous hotline. We'll take everything that's brought to our attention seriously. Let **us** make that decision.

A close-up photograph of a man with short, graying hair and black-rimmed glasses. He is smiling and looking towards the camera. He is wearing a white button-down shirt with a dark, patterned collar. A name tag on his chest reads "Yan". The background is a blurred office setting.

DISCIPLINARY ACTIONS

If anyone is found to have violated an Apellis policy, our Code of Conduct, or the law – be they employee, contractor, or business partner – we will take appropriate corrective action. Employees who violate this code, company policy, or the law will be subject to disciplinary actions up to and including employee or contract termination. If a law or regulation has been broken, we'll cooperate fully with the authorities throughout.

NON-RETALIATION POLICY & OBLIGATION TO REPORT

We pride ourselves on a culture that fosters open and respectful communications and provides a safe environment in which concerns can be raised and addressed.

We will not tolerate retaliation against any Apellis employee who has made a report or complaint in good faith about an actual or potential violation of our Code, our policies or procedures, or the law. This also applies to anyone who may cooperate in an investigation if one ensues.

At Apellis, we consider **retaliation** to include:

- Any employment decision or other conduct made with the intent to punish an Apellis employee for submitting a complaint or assisting in a company investigation; and
- Any decision or conduct that may discourage an Apellis employee from submitting a complaint or cooperating in an investigation.

Disciplinary Action

To further a community of trust and in the interest of all Apellis employees, the company will take disciplinary action, up to and including dismissal or termination of contract, against anyone who threatens or engages in any form of retaliation, harassment, or retribution against someone who has reported actual or potential wrongdoing, or who is considering doing so.

Restrictions on Reports of Wrongdoing

Apellis recognizes the potentially serious impact of an accusation on the person who has been accused and those involved. Apellis employees should act responsibly and with due consideration in making a complaint and in reporting potential wrongdoing. Understand that making a complaint or report without a true, good-faith basis is itself a violation of the Code that will subject the reporting Apellis employee to appropriate disciplinary action.

In addition, reporting wrongdoing, even where warranted, will not insulate a person from responsibility for any role that he or she played in the wrongdoing (or from responsibility for ongoing or future performance-related issues). However, prompt reporting and forthright disclosure can serve as a mitigating factor in the determination of consequences.

For more information, please refer to "Reporting Suspected Violations of the Code".