

A woman with dark hair, wearing a white lab coat and clear safety goggles, is looking intently at a multi-well plate in a laboratory setting. The background is a bright, out-of-focus lab environment. The word "Apellis" is overlaid on the left side of the image.

Apellis

Code of Conduct

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A Message from Our CEO

At Apellis, we combine courageous science and compassion to develop life-changing medicines for some of the most challenging, complement-driven diseases that patients face. We do so with humanity, compassion, unrelenting optimism and a healthy dose of fearlessness. We care deeply about each other and the patients and communities we serve, and thus, we are authentic and transparent with one another and with our external stakeholders.

Each day, patients, their loved ones and healthcare professionals count on Apellis to pursue and deliver innovative treatments for serious diseases. We maintain their trust by delivering quality medicines and operating with integrity.

This Code of Conduct is a reflection of who we are and how we choose to operate — with integrity, transparency and respect for one another and the communities we serve. Compliance, both in letter and in spirit, is the foundation upon which this Code of Conduct is built and the driving force behind how Apellis conducts its business. In following the Code, we honor our ethical commitment to patients, their families, healthcare professionals and one another.

We believe that a strong ethical foundation empowers us to make better decisions, build lasting relationships, attract key talent and create a culture where everyone feels safe to speak up. Retaliation against a person who raises a concern in good faith about a potential violation of laws, the Code or our policies, is not allowed. Upholding these principles is not just the responsibility of a few — it is a shared commitment across our entire organization.

At Apellis, our values guide us in every action, and together we are unwavering in our commitment to doing what is right.



Cedric Francois, MD, PhD
Cofounder & Chief Executive Officer/President



"By upholding integrity in all we do, we can continue delivering life-changing innovation to patients and the healthcare community. Thank you."

A Message from Our Chief Compliance Officer

I would like to personally thank you for taking the time to review this Code. Your support and continued commitment to the principles expressed in the Code helps to ensure that Apellis ethically carries out its mission as a public company providing life-changing treatments to our patients.

Acting ethically and showing integrity takes courage, and it is not always easy. However, if we want to keep Apellis a place where we can all be proud of what we do, we must support one another in this effort.

Should you ever have a question or concern, you can reach out to your manager, Ethics & Compliance business partner, Legal, HR or directly to me. There are multiple avenues at your disposal to seek guidance from and to share your concerns. We care and want to hear from you.

Integrity matters.

Best,



Sarah Whipple

VP, Global Chief Compliance Officer



"Apellis is an amazing place to work because we care deeply about one another and our patients. Let's keep it a place we are proud to be part of by helping each other drive our business forward ethically."

Introduction to the Code

We at Apellis Pharmaceuticals, Inc. (“Apellis” or the “Company”) are committed to conducting our activities with the highest ethical standards. Our Code reflects our Company’s core values and principles that guide our behavior. At Apellis, our values are the road map for how we engage with one another and with key stakeholders, such as patients, healthcare professionals (“HCPs”), regulators and investors. Our values guide us in every decision we make. They are not just how we operate. They are who we are.

All employees of Apellis, its affiliates and its subsidiaries (collectively, “Apellis”), including corporate officers and members of our Board of Directors, must adhere to our Code. Additionally, the Code is applicable to business partners, including consultants, vendors and contractors working on behalf of Apellis. Although some individuals may not actually be employed by Apellis, solely for purposes of succinctly describing the obligations contained in this Code, all persons covered by this Code are referenced as “employees,” “we,” “us” and “our.”

The Code is the foundation of Apellis’ Compliance Program. The purpose of the Code is to help all Apellis employees make decisions with integrity and the highest standards of ethical judgment. In addition, adherence to the Code helps us understand and comply with laws applicable to the pharmaceutical industry and public companies, like Apellis.

The Code does not replace or serve as a substitute for existing Apellis policies, procedures or training. The Code does not address every situation you may encounter and certain exceptions to the Code may apply per Apellis policies. You should always follow applicable Apellis policies, procedures and training, and if you have any questions please contact your manager, Legal or Ethics & Compliance.

Additionally, Apellis employees are encouraged to raise questions or concerns at all levels of the organization: among peers, with supervisors and senior management and, if needed, with Human Resources (“HR”), Legal and/ or Ethics & Compliance. Doing the right thing is everyone’s responsibility, and it is better to resolve questions through good communication.

The policies described in this Code are intended as a guide only and do not constitute a contract of employment. Employment with Apellis is at will unless otherwise specified in a written agreement. This means employment with Apellis is not for any specified period and may be terminated by the employee or Apellis at any time, with or without cause or advance notice. In addition, Apellis reserves the right to exercise its managerial discretion in imposing any form of discipline it deems appropriate for violations of the Code.

Nothing in this Code is intended to interfere with an employee’s rights under applicable federal, state and local laws, including the National Labor Relations Act (“NLRA”), nor will Apellis construe this Code in a way that limits such rights. Employees have the right to engage in or refrain from activities protected by the NLRA.

A culture of doing what’s right

We at Apellis work:



Compliantly



In line with laws and regulations



By balancing risks and opportunities

Our Values

Our Values guide every decision we make. Here at Apellis, we do things the right way. We stand for exquisite quality in our products, and we exercise care in every action we take. Our values influence how we make decisions, how we treat one another and external stakeholders and what we prioritize at Apellis.



We Care

We are dedicated to improving the lives of patients, their families and our employees.



We Are Fearless

We take risks and push ourselves to be more productive and innovative.



We Love What We Do

We are passionate about our work, our purpose and the positive impact we can make.



We Are Complement

We continually pursue the highest level of scientific integrity, inclusion, curiosity and collaboration.



We Are Resourceful

We challenge ourselves to do things in the most agile and efficient way while protecting Apellis' business interests.



We Belong

We create an environment where we embrace differences, learn fearlessly and evolve together.

We Care

We are dedicated to improving the lives of patients, their families and our employees.

- Compliance Is Everyone's Responsibility
- Making the Right Choice
- Being a Good Corporate Citizen
- Apellis Fosters a Safe Environment

Compliance Is Everyone's Responsibility

Each of us must take responsibility for acting with integrity.

- Always act in a professional, honest and ethical manner when acting on Apellis' behalf.
- Be familiar with the requirements of this Code and applicable Company policies, procedures and training.
- Complete all required employee training in a timely manner.
- Be respectful of others, including their areas of expertise, role and perspectives.
- Take responsibility and accountability for your actions and act with integrity.
- Report concerns about possible violations of this Code, our policies or the law to your manager, a member of HR, Legal or Ethics & Compliance, or anonymously using **Apellis Listens, our Ethics & Compliance Hotline**.

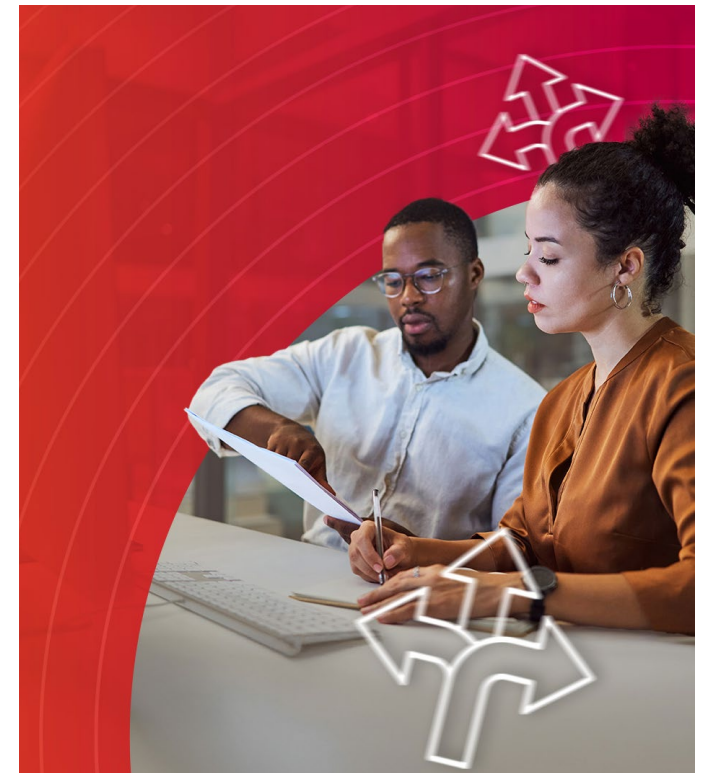
The Role of Managers

Managers and employees in supervisory roles play a critical role in reinforcing the importance of compliance at Apellis. Every manager in this organization is expected to:

- Serve as a role model and ethical leader who follows the Code and all Apellis policies and training,
- Reinforce for their teams the importance of complying with applicable laws, the Code, and Apellis policies and training,
- Encourage their team to seek guidance from Legal or Ethics & Compliance regarding any questions around applicable laws, the Code, or Apellis policies and training,
- Encourage their team members to report suspected violations to Ethics & Compliance, Legal, Human Resources, or the hotline, **Apellis Listens**,
- Promptly report any allegations of noncompliance of which they become aware to Ethics & Compliance or Legal, and any allegations of discrimination or harassment to Human Resources, Legal or Ethics & Compliance,
- Fully cooperate in any internal or external investigations or legal proceedings, and
- Ensure their supervised employees and contractors comply with all compliance training requirements in a timely manner and accurately capture all transfers of value to HCPs and government officials (if applicable).

Apellis Principle

At Apellis, we collaborate compliantly as one team, and we believe compliance is everyone's responsibility!



Making the Right Choice

We want to make sure that Apellis is a great place to work for everyone, and acting with integrity helps us keep it this way. However, sometimes situations are not clear-cut. Therefore, when facing a difficult decision regarding an activity or behavior, **ask yourself**:



If the answer to all these questions is **Yes**, then it is probably OK to proceed.
If not, **seek guidance from Legal, Ethics & Compliance or your Manager**.

Being a Good Corporate Citizen

At Apellis, our vision is that the Company is recognized as a compassionate organization known for revolutionary science and contributions to humankind. We care fiercely about the greater good of society and believe corporate responsibility is foundational to achieving our vision.



Apellis provides a variety of funding support to important causes through donations, grants and sponsorships. For example, Apellis routinely provides grants and support for patients and professional organizations and institutions that:

- Provide broad public benefit, improve patient experiences and outcomes and advance scientific knowledge
- Are aligned with **Apellis' scientific and medical areas of interest**
- Correspond to **Apellis' corporate vision and values**
- Are consistent with Apellis' business, public policy or philanthropic priorities

Apellis Principle

We care fiercely about the greater good of society and believe corporate responsibility is foundational to achieving our vision.

We Do What's Right

At Apellis, we strive to ensure our **interactions with independent organizations** and the provision of financial support are in **strict compliance** with relevant laws and regulations, industry codes and guidelines and Apellis policies. Regardless of the type of support, all organizations that apply for corporate giving must review and adhere to **Apellis grants and giving requirements** delineated on the Apellis corporate website.

Apellis is committed to respecting human rights in our business operations, and we expect the same from the suppliers we work with. We operate in line with the United Nations' Universal Declaration of Human Rights and do not work with business partners who employ children or forced labor or otherwise violate human rights.

Apellis Fosters a Safe Environment

Ensuring the health and safety of everyone who works for us and with us here at Apellis is a shared responsibility. It is our responsibility to one another, and to anyone who enters our premises, to maintain work conditions that are safe and in compliance with the laws and regulations that apply to our work. This commitment extends to maintaining facilities and premises in compliance with all applicable health and safety laws and regulations.

At the same time, we care about the world we live in. Therefore, we are committed to minimizing any potential damage to the environment and promoting sustainability.

We Do What's Right & Act Responsibly

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

Deadly weapons are not permitted on Apellis' premises. This applies to actual Company premises (including facilities, common areas and parking lots) or at a Company event.

Drugs and Alcohol: While at work or on Company business, including while driving a Company vehicle, you should:

- Behave responsibly when it comes to the consumption of alcohol. You should not be

impaired due to being under the influence of alcohol or illegal or legal drugs, such as marijuana; and

- Not use, possess or be under the influence of any illegal drugs or any substance that could interfere with a safe and effective work environment.

Prioritize safety and the environment: We take responsibility for making employee safety and environmental protection a priority. If you encounter a situation that may create unsafe working conditions or harm the environment, stop work immediately and report it to Human Resources.

Apellis Principle

We are committed to providing a healthy and safe workplace for all employees, contractors and guests.



 **Please report any incident of violence or threatened violence immediately to Human Resources.**

We Belong

We create an environment where we embrace differences, learn fearlessly and evolve together.

- Apellis Celebrates Diversity
- Apellis Does Not Tolerate Discrimination or Harassment



Apellis Celebrates Diversity

At Apellis, we bring together employees with a wide variety of backgrounds, skills and cultures. We are proud of the diversity and inclusion of our Company and appreciate that diversity is a key driver of success.



Apellis Principle

Apellis should be a place where you feel you "belong," meaning you feel safe and valued for who YOU are.

We always treat each other with dignity and respect, regardless of our differences in skill, background, experience or culture. We listen carefully to the opinions of others, we respond with care and compassion and we aim to foster a culture of belonging and acceptance.

We rely on each other to uphold this value. If you witness a colleague who is not acting with inclusion in mind, say something.

We Do What's Right

- Treat others respectfully and professionally
- Always use good judgment
- Make decisions consistent with our commitment to diversity, and hold your colleagues accountable

Apellis Does Not Tolerate Discrimination or Harassment

Apellis is proudly committed to being an equal opportunity employer, where the opportunity to develop and advance is made free of discrimination on the basis of a person's race, color, religious creed, national or ethnic origin, citizenship status, ancestry, sex, gender, sexual orientation, transgender status, gender identity or gender expression, age, qualified mental or physical disability, family and medical leave status, pregnancy or a condition related to pregnancy (including lactation or the need to express milk for a nursing child), genetic information, veteran status or membership in the armed forces, marital status, misdemeanor arrest record or any other characteristic protected by federal, state or local law ("Protected Classifications"). This next section covers Apellis' prohibition against making employment decisions based on discriminatory factors, as well as prohibiting sexual harassment, workplace bullying and retaliation.



Apellis Principle

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

What Is Considered Discrimination or Harassment?

- Discrimination means treating people differently based on a person's having certain Protected Classifications.
- Harassment is unwelcome conduct based on a person's having certain Protected Classifications.

Apellis Does Not Tolerate Discrimination or Harassment



Note that if any manager receives an allegation of discrimination, harassment, workplace bullying or retaliation from an employee, the manager **must** report that allegation to Human Resources, Legal or Ethics & Compliance.

At Apellis, we hire, develop, evaluate and promote Apellis employees based on merit, qualifications, suitability for the role and potential development. A respectful working environment is fundamental to doing our best work. Apellis does not and will not tolerate harassment or discrimination against an employee based on that person's having a Protected Characteristic.

Apellis also prohibits any type of retaliation against anyone who in good faith raises concerns about a discriminatory practice, files a discrimination charge or complaint, provides information in an investigation of alleged discrimination or participates in or is a witness in a discrimination lawsuit, hearing or proceeding. All Apellis employees, contractors and suppliers are treated with respect and professionalism. Our colleagues, job applicants and business partners are entitled to respect. They should be judged on the basis of their qualifications, skills and achievements. We are all responsible for maintaining a work environment in which our differences are respected. This kind of environment engenders diversity of thought and potential innovation.

Apellis also prohibits sexual harassment. The Company prohibits any situation in which offensive sexual conduct or unwelcome sexual advances or requests are linked to, or are a condition of, employment decisions.

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

Finally, Apellis will make good faith efforts to provide a reasonable religious accommodation to employees whose sincerely held religious beliefs conflict with an Apellis employment requirement in accordance with applicable law.

? What If

Q: You think a coworker's joke is funny, but someone else is offended. Could this be considered sexual harassment?

A: Yes, sexual harassment can be subjective.

Q: I am a manager and one of my direct reports told me that they feel that a colleague treats them differently because of their race. What should I do?

A: You must report this allegation to HR immediately, as under various discrimination laws, the Company can be held liable if managers receive this type of report and the Company fails to take appropriate steps.

Apellis Does Not Tolerate Discrimination or Harassment

We Do What's Right

We do not tolerate workplace bullying of any kind.

Apellis prohibits and will not tolerate any form of workplace bullying by and against its employees, supervisors, managers, applicants for employment and others in the workplace environment, including customers, vendors, contractors, patients, visitors and other members of the public with whom we interact.

Workplace bullying can present itself in different forms and abusive conduct. It includes acts or omissions that, based on their severity, nature and frequency, would cause a reasonable person to believe that an employee was subject

to an abusive work environment. It also includes conduct made with the intention of harming someone and that a reasonable person would find offensive, humiliating, intimidating and unrelated to an employer's legitimate business interests. This may include but is not limited to repeated verbal or written abuse, including derogatory remarks, insults and phrases; verbal, nonverbal or physical conduct of a threatening, intimidating or humiliating nature; or sabotaging or undermining an employee's work performance. This list is illustrative only and not exhaustive. No form of workplace bullying or abusive conduct will be tolerated.



Remember: Sexual harassment can occur when there are:

- Unwelcome actions, such as requests for dates, sexual favors or similar conduct of a sexual nature, are made a condition of employment or are used as the basis for employment decisions (Conditions of Employment)
- An intimidating, offensive or hostile work environment is created through severe or pervasive offensive conduct, including but not limited to unwelcome sexual advances; sexually offensive or obscene jokes, remarks, advances or gestures or other offensive verbal or physical behavior of a sexual nature; leering; stereotyping; displaying or distributing sexually offensive or obscene posters, cartoons or other materials; or any form of stalking or bullying (Hostile Work Environment)



Let's take a closer look

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

- Someone in a position of power who demands sexual favors from a subordinate in exchange for a job benefit, such as a promotion, raise or favorable work assignment;
- Unwelcome conduct that has the purpose and effect of substantially or unreasonably interfering with an individual's work performance by creating an abusive, intimidating, hostile or offensive work environment. Hostile work environment harassment applies to all forms of harassment based on Protected Classifications and not just sexual harassment;
- Physical activities, which may include but are not limited to touching, blocking someone's path, standing too close to someone, vandalizing property with disparaging or abusive words 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, sexually explicit comments, offensive jokes or name-calling; and
- Visual activities, which may include but are not limited to displaying inappropriate or obscene photos, posters or cartoons.

We Are Complement

We continually pursue the highest level of scientific integrity, inclusion, curiosity and collaboration.

- Apellis Complies with Healthcare Laws & Codes
- Apellis Does Not Bribe for Business
- Apellis Selects Good Vendors
- We Work Responsibly with Healthcare Professionals & Healthcare Organizations
- We Are Transparent About our Relationships With Healthcare Professionals & Healthcare Organizations
- Apellis Provides Funding Responsibly
- We Respect the Independence of Patients & Patient Organizations
- Apellis Complies with Antitrust & Competition Laws
- Apellis Adheres to International Trade & Anti-Boycott Laws
- We Respect Privacy Rights
- Apellis Complies with Government Pricing Requirements
- Apellis Engages Responsibly in Political Contributions & Activities

Apellis Complies with Healthcare Laws & Codes



Apellis is committed to conducting business and scientific research in full compliance with all applicable laws (e.g., the U.S. Anti-Kickback Statute or the U.S. False Claim Act), regulations and industry standards (e.g., the Pharmaceutical Research and Manufacturers of America Code on Interactions with Health Care Professionals (the “PhRMA Code”) or the European Federation of Pharmaceutical Industries & Associations Code of Practice (the “EFPIA Code”)). As an Apellis employee, the Company relies on you to ensure we meet our legal and ethical obligations.

We Do What's Right

- Apellis is a publicly traded company and operates in a highly regulated industry where violations of law, regulations and industry standards can have serious impact and consequences for patients, HCPs, employees, investors and our Company.
- It is important that all employees understand how these laws and regulations apply to their work at Apellis.

Apellis Does Not Bribe for Business

Apellis is committed to complying with all applicable antibribery and anti-corruption laws.



Apellis strictly prohibits the direct or indirect (e.g., through a third party) offering, paying or accepting of any and all bribes, kickbacks or facilitation payments, at any time, under any circumstances. We must also avoid any type of activity or behavior that could be perceived as a form of bribery or corruption.

Bribery occurs when a person offers, gives or receives anything of value to any person or company in order to obtain business, financial or commercial advantage for Apellis.

Corruption includes fraudulent or false abuse of power.

Facilitation payments include financial payments that may constitute a bribe and are made solely with the intention of expediting an administrative process. Typically, these are cash payments made to a public or government official to ensure the performance of routine government actions. For example, this could include payments for processing paperwork, obtaining licenses or permits or providing police protection.

It is important to bear in mind that antibribery laws apply to our relationships with HCPs in the United States. There are other antibribery laws that apply to our relationships with HCPs outside of the United States because they work for public hospitals or institutions. Other bribery laws prohibit the bribery of private citizens.

Apellis Principle

We prohibit all forms of bribery and corruption, whether involving a government official or private person or entity, and directly or indirectly through a third party.

Remember

Perceived or actual bribes can happen, whether it be a transaction or activity.

- An offer for a bribe is illegal even if the transaction never takes place.
- Bribes could be in form of cash payments, gifts, fees, lavish meals, entertainment, rewards or advantages, grants, sponsorships, honoraria, employment; there is no de minimis value.
- Bribery can involve government officials, HCPs and private individuals.
- Intent and perception count when it comes to enforcement.

Apellis Does Not Bribe for Business

Here are some examples of the types of activities that could trigger bribery laws to the extent that any transfers of value are offered or provided with the purpose of influencing a decision:

- Interactions with customs officials related to the import and export of our products, clinical trials and research conducted in other countries
- Interactions with regulatory agencies regarding approval of Apellis products
- Relationships with HCPs as consultants, speakers or advisers
- The provision of research or educational grants, sponsorships or donations
- Meals, entertainment or gifts for HCPs or government officials

Simply put — at no time may any Apellis employee or anyone else acting on Apellis' behalf offer, promise, give or receive money or anything else of value to anyone, including any HCP, government official, healthcare organization ("HCO"), payor or private citizen, to gain a business advantage for Apellis.

We Do What's Right

Healthcare professionals: There are strict rules regarding gifts, entertainment and hospitality or meals provided to HCPs, and these may not be

provided as a bribe or an inducement to get HCPs to prescribe Apellis products or gain any business advantage for Apellis. See *Global Interactions with Healthcare Professionals Policy*.

Government officials: Laws around the world may vary, but for us it is simple. We do not offer payments, gifts or anything else of value, including meals, to government officials to gain a business advantage for Apellis. In addition, many government officials have to comply with strict rules about whether they can even accept gifts, payments or meals from pharmaceutical companies.

Providing or paying for entertainment for government officials is not appropriate and not permitted under Apellis policies.

Lastly, Apellis only works with business partners who share our commitment to conducting business ethically and free from bribery and corruption. For that reason, we carefully review and attend to third-party relationships (such as distributors, consultants and contractors) with clear expectations that bribery and corruption are unacceptable under any circumstance (see *Apellis Selects Good Vendors*).

Please see the *Apellis Global Antibribery* and *Anti-corruption Policy* for more information.



What If

Q: What if a doctor who operates in one of the therapeutic areas in which Apellis is active asks to consider his daughter for an open position in my department?

A: Hiring the doctor's daughter could potentially be considered as an action intended to influence the doctor to prescribe or recommend Apellis' products and can create a bribery risk. Therefore, you should check with Legal or Ethics & Compliance before proceeding.



Remember

Make sure that if you provide any kind of payment, gift, meal, expense reimbursement or other transfer of value to an HCP, government official, vendor, business partner or other stakeholder, you **document** it appropriately and according to Company policies. It is also **not permitted** to try to get around Company policies by **personally paying** for any gift or other type of transfer of value to an HCP, government official, business partner or other stakeholder.

Apellis Selects Good Vendors

Because Apellis can be held responsible for the actions of its vendors and agents, Apellis carefully selects all third parties that perform activities on our behalf, such as clinical research organizations (“CROs”), manufacturers, distributors, HCP consultants and speakers. Accordingly, we perform due diligence on these vendors, considering factors such as quality, compliance, specialty, experience, capability, reliability and price. In addition, Apellis conducts compliance, privacy, security, debarment and sanctions diligence utilizing a risk-based approach.

To ensure that third parties and vendors act in accordance with Apellis standards, we also maintain proper oversight over our vendors. We include specific contractual provisions in our contracts requiring vendors to adhere to applicable regulations and Apellis' standards. They receive training and must comply with mutually agreed upon policies and procedures. Vendors and third parties in high-risk areas are also subject to auditing and monitoring by Apellis.

Remember

- A third-party can be any vendor, manufacturer, CRO or individual acting on behalf of Apellis.
- All third parties are expected to act in accordance with this Code of Conduct and Company policies.
- Contact your manager, Procurement in Finance or Ethics & Compliance if you are unsure of the due diligence process and the process for ensuring appropriate training has been provided to applicable third parties.



We Work Responsibly with Healthcare Professionals & Healthcare Organizations

When dealing with HCPs and/or HCOs, we are committed to the appropriate use of our products, and we promote patient welfare by operating ethically and transparently, respecting the clinical judgment of HCPs, respecting patient privacy and complying with applicable laws, regulations and Apellis' policies. We 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 advisers, consultants or educators. In doing so, employees abide by professional standards in applicable industry codes of conduct, such as the PhRMA and EFPIA Codes, Company policies and all applicable laws and regulations.

Who is an HCP? What is an HCO?

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

- **HCP:** Any medical professional who, in their professional capacity, may influence the use, purchase, prescription or recommendation of Company products including but not limited to physicians, nurses and nurse practitioners, physician assistants, pharmacists, medical directors, residents and medical students as well as employees, contractors and agents of these individuals such as administrative staff, research coordinators and other providers of health care.
- **HCO:** Entities that (i) provide healthcare services such as hospitals, nursing homes, pharmacies, physician clinics, integrated delivery networks and group practices as well as (ii) healthcare, medical or scientific associations or organizations that may have an influence on the prescription, recommendation, purchase, supply or utilization of Apellis products such as research institutions, foundations, teaching institutions or learned societies or universities.

Apellis Principle

We have built, and will continue to build, our name and reputation **by doing business honestly and with integrity.**



We Work Responsibly with Healthcare Professionals & Healthcare Organizations



Communications with HCPs and HCOs:

All interactions and communications with HCPs and HCOs will be conducted in a manner that is fair and balanced, scientifically rigorous and compliant with applicable laws and regulations. To ensure this, all written materials are reviewed by a local review committee. Apellis' advertising and promotion efforts focus on conveying useful and appropriate information to HCPs, HCOs, patients, Patient Organizations and customers. We only promote our medicines for uses that have been authorized

by appropriate government or regulatory agencies and in a manner that is permitted under local laws, regulations and industry codes. Similarly, all information and materials intended to be disseminated through scientific exchange will also comply with local laws and be scientifically accurate and balanced.

Engaging HCPs for services: When Apellis engages HCPs as consultants, advisers or educators or to provide other services, the Company must have a legitimate business need for the service and require the skills or experience of the particular HCPs engaged. All service arrangements must be documented in a signed written agreement and, where payment is required, the fee is consistent with fair market value or deemed reasonable by Ethics & Compliance.

Meals provided to HCPs: All meals provided to HCPs must be provided in accordance with state and local laws as well as the relevant local industry codes (e.g., the PhRMA or EFPIA Codes). Meals should be held only at appropriate venues, be of modest value and incidental to an informational presentation or business discussion. Meals may not be provided to guests or spouses of HCPs.

No gifts or entertainment: It is prohibited to provide personal gifts, entertainment or recreation to HCPs. We also do not allow employees to engage in entertainment or recreation with HCPs.

Educational items provided to HCPs: Certain permissible educational items may be provided to HCPs when they comply with applicable state laws and local industry codes (e.g., PhRMA or EFPIA Codes). To ensure local compliance, all educational items provided to HCPs must be approved in advance by Ethics & Compliance.



We Are Transparent About Our Relationships With Healthcare Professionals & Healthcare Organizations

It is Apellis' policy to report all transfers of value to HCPs and HCOs as required by international, U.S. federal, state and local laws and regulations. Examples of transfers of value include fees for service, expenses for meals, travel and accommodation, sponsorships, educational grants and funding of research activities. Apellis has implemented policies and processes for capturing applicable transfers of value. As an Apellis employee, it is your responsibility to track transfers of value to HCPs or HCOs in accordance with these policies and procedures.



Where can I find payments made to HCPs and HCOs by our Company and other companies?

- In the U.S., reportable transfers of value under the U.S. Sunshine Act (now known as Open Payments) can be found on the CMS's Open Payment website for all life sciences companies.
- State government websites will also make some of these transfers of value publicly available.
- For information related to specific payments or transfers of value by Apellis, contact Ethics & Compliance with questions.

We Do What's Right

Transparency Reporting:

- Obligation for pharmaceutical companies to **track and disclose transfers of value** to HCPs and HCOs
- This provides visibility into the **financial relationships** between pharmaceutical companies and HCPs/HCOs



Let's take a closer look

Transparency Laws

- Jurisdictional laws & codes relating to our relationships with HCPs and HCOs are expanding throughout the world.
- Reporting obligations generally derive from:
 - National or state laws, e.g., United States, France and Belgium
 - Industry codes, e.g., EFPIA Code
- Apellis complies with reporting obligations deriving from national laws around the globe and is already subject to transparency requirements in some countries, including the U.S. Sunshine Act and France.

Apellis Provides Funding Responsibly

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



To ensure compliance with this principle and relevant laws, all requests for support of grants, charitable donations, 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 (e.g., Grants Review Committee, Sponsorships Review Process). 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 donations 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.

Apellis Principle

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

? What If

- Q:** What if a doctor who works in an important hospital asks you to sponsor an educational program the hospital is organizing?
- A:** You should follow up on the request in line with the appropriate sponsorship review process for your country. This ensures that the content and merits of the request are reviewed based on objective criteria to ensure that the funding is provided for valid business reasons, such as being able to educate an appropriate audience about our products. A doctor requesting the sponsorship is not a good reason to provide the funding, and if we do so for that reason, it could be viewed as intended to influence the purchase or the recommendation of Apellis' products.

We Respect the Independence of Patients & Patient Organizations

Interactions with patients, caregivers and Patient Organizations should always be in the best interest of the patient and abide by the principles of independence, clarity, transparency and integrity. Apellis employees should never provide medical advice to a patient or interfere with the provision of healthcare to a patient by an HCP. When interacting with Patient Organizations, including patient advocacy groups or medical societies, the organization's mission and independence should always be respected. Patient Organizations should never be used to promote Apellis' products. All Apellis employee interactions with patients, caregivers and Patient Organizations should be carried out in accordance with all applicable laws and regulations, industry codes and Company policies.

What Is a Patient and a Patient Organization?

Patients

- Persons receiving medical treatment who are currently using, have used or may use an Apellis product or product candidate.

Patient Organizations (POs)

Include:

- Patient Advocacy Organizations, which are independent, nonprofit groups providing advocacy and support to patients without endorsing specific drugs, treatment or manufacturers.
- Patient Assistance Organizations are independent, nonprofit groups providing financial assistance programs to help patients obtain treatment or financial support to assist patients living with a disease for which Apellis products are indicated.

Apellis Principle

Our interactions with patients & Patient Organizations **are intended to benefit patients** with improved access and education about our products and the diseases they treat.



Apellis Complies with Antitrust & Competition Laws

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



Apellis Principle

Maintaining fair, transparent competition and ethical business practices.

Remember

Collusion occurs when companies coordinate or agree on competitive practices. This can involve sharing or agreeing on pricing, terms, wages or dividing markets.

Bid-rigging happens when competitors or service providers manipulate the bidding process to restrict fair competition. This may include coordinating bids, agreeing not to bid or intentionally submitting uncompetitive offers.

Tying takes place when a company with significant market power compels customers to purchase additional services or products they do not want or need.

Predatory pricing occurs when a dominant company sells services or products below cost to weaken or eliminate competitors. Once the competition is harmed or removed, the company raises prices to recoup its losses.

Apellis Complies with Antitrust & Competition Laws



Apellis is committed to fair and open competition and business dealings, prohibiting agreements that restrict free enterprise in any of the countries in which we operate.

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

We Do What's Right

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; or
- 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; or
- 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 the Legal Department before interacting with competitors or engaging in business activities that could potentially unfairly restrict trade.

? What If

Q: What if I want to meet with an employee of a competitor for lunch to gain insights on their business.

A: Meeting with an employee of a competitor to gain business insights can potentially violate certain antitrust laws and can put both you and the competitor employee at risk of sharing confidential information. Therefore, before meeting with a competitor employee, you must check with the Legal Department. You will also need to document the discussion.

Apellis Adheres to International Trade & Anti-Boycott Laws



Apellis is a global company that is involved in international commercial trade. We import and export our products to all parts of the world, supporting our customers on a global basis. Therefore, we are subject to a variety of import and export laws, economic sanctions, customs requirements and other laws. In addition to complying with U.S. laws that govern the import, export and re-export of our products, we must comply with the laws of other countries to which our products are exported and where our products are manufactured or used. Any violation of these laws, even unintentionally, could have damaging and long-lasting effects on our business.

If your responsibilities include exporting products or receiving imported products, you are responsible for screening customers and vendors against U.S. sanctioned, restricted, denied and debarment lists, as well as knowing and complying with applicable import and export laws and counter-terrorism requirements. In addition, participating in illegal trade boycotts, which is when two or more competitors agree not to do business with another company, is also illegal.

We Do What's Right

Apellis employees must:

- Obtain all necessary licenses before the import, export or re-export of products, services or technology.

- Report complete, accurate and detailed information regarding every exported or imported product, including its place(s) of manufacture, its intended use, correct tariff code and its acceptable customs value.
- Provide accurate and complete information to customs officials.
- Not participate in illegal trade boycotts.
- Screen customers and vendors against U.S.-denied party, sanctioned, restricted and debarment lists.
- Contact Legal immediately if in receipt of a request for information about a boycotted, sanctioned country or 'blacklisted' company or you have any questions about this section.

We Respect Privacy Rights

In the course of conducting business activities, we may collect, access, use, store, share, analyze or destroy (collectively or individually “process”) the Personal Information of individuals. “Personal Information” is any information relating to an identified or identifiable natural person, including but not limited to name, contact information, health information, demographic information, financial information and work history (for full definition, see the **Global Privacy Policy**). Apellis respects the privacy of others and has a legal responsibility to keep Personal Information confidential and secure.

We are committed to complying with national and local laws required to protect Personal Information.

Apellis and its employees must comply with the following principles when processing Personal Information as they interact with HCPs, patients, caregivers, consultants, vendors and other Apellis employees:

- Provide notice of the Personal Information that will be processed and the purposes of collection and use.
- Where legally required, such as when processing “sensitive” Personal Information like health details, obtain consent.
- Use only the minimum amount of Personal Information necessary to achieve a legitimate business purpose.
- Retain Personal Information only as long as necessary to achieve that purpose or related purpose.
- Ensure data subjects' rights requests are honored in accordance with the law by referring any requests to privacy@apellis.com.
- Report any incidents potentially impacting the security of Personal Information to the IT Help Desk.
- Securely store and dispose of Personal Information in accordance with Company information security policies.
- Only share Personal Information with those who have a legitimate business need for the information in accordance with the **Apellis Global Privacy Policy**.

Apellis Principle

- Apellis is committed to the **legal processing** and collection of Personal Information.
- Apellis implements policies & processes that set a **global standard** for how we protect personal data, no matter where it is located.
- Our Information Technology team incorporates requirements from all applicable laws and **integrates them into our business processes**.



How Does Apellis Comply with Privacy Requirements?

Maintaining policies & procedures



Data Protection Impact Assessment

Data subject rights procedures



Data breach & incident response

Contracts



How Can You Help?

Contact us on privacy@apellis.com



Legal Review

Work with Legal to ensure vendors handling Personal Information have signed appropriate agreements & adequate processes to protect privacy.



Report Data Incidents

Notify any suspected loss, misuse, theft or inadvertent disclosure of Personal Information.



Data Subject Requests

Direct any requests for access, deletion or amendment of Personal Information.

Anyone who intentionally discloses or misuses Personal Information may face disciplinary action, and potentially civil and criminal penalties.

For additional information, please see the *Apellis Global Privacy Policy*.

Apellis Complies with Government Pricing Requirements



Apellis is legally required to provide the government, payors, HCPs and HCOs with accurate pricing information. Apellis is committed to providing timely and accurate information as required by contracts or federal, state or local laws. Price reporting includes tracking prices, submitting reports, offering contracts at certain prices and/or paying specific rebates to customers to comply with federal, state and local laws. Specific contracts may also require that Apellis submits pricing information to certain private payors.

Apellis price reporting for products is overseen by a Company pricing committee that supervises product pricing; the provision of standard terms, rebates, and discounts; and compliance with applicable laws.

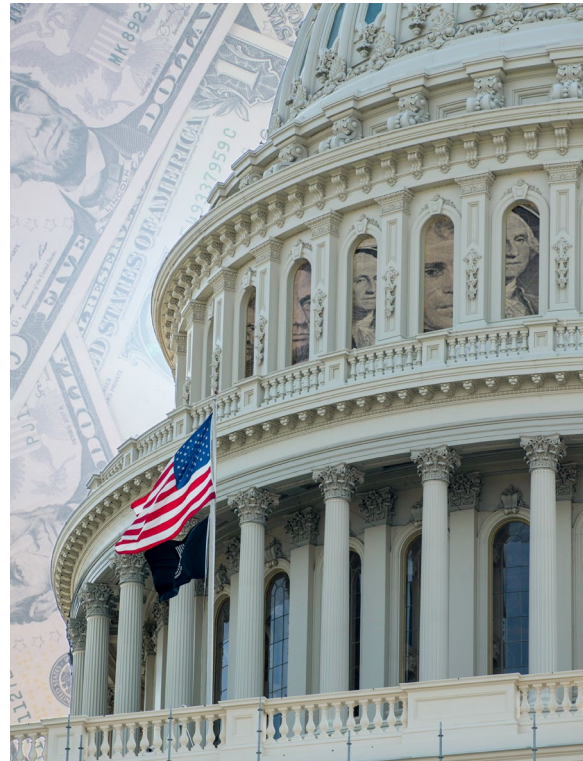
Apellis Engages Responsibly in Political Contributions & Activities

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 in 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. Company funds should never be used for political purposes without the proper approvals from the General Counsel and Corporate Communications.

Outside of the workplace, Apellis employees engaging in political activities agree to do so solely on their own behalf and time, not on Apellis's behalf or time, or with the use of any of the Company's funds, assets or other Company resources nor as otherwise prohibited by Company policy. During any personal activities, you must ensure that you have made it clear that your actions and views



are personal and do not represent Apellis. Apellis will not reimburse any employee in any way for time or funds used for personal political contributions or activities.

Remember

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

Guidelines for Political Activities and Interactions with Government

Lobbying: Any interactions with government employees, including regulators or individuals acting as government agents, that could be interpreted as lobbying must be discussed and approved in advance by the General Counsel.

Pressure: Never exert direct or indirect pressure on another employee to contribute to, support or oppose any political candidate or party.

Improper influence: Avoid actions that could appear as using political or charitable contributions to gain favor or exert influence. Be especially cautious in international markets where bribes may be disguised as requests for political contributions.

Conflicts of interest: Running for or holding political office must not create or appear to create a conflict of interest with your responsibilities at Apellis. Consult your manager, Human Resources or Ethics & Compliance if you have any questions or concerns.

We Are Resourceful

We challenge ourselves to do things in the most agile and efficient way, while protecting Apellis' business interests.

- We Are Transparent About Conflicts of Interest
- We Use Company Resources & Assets Appropriately
- Apellis Maintains Accurate Books & Records
- Fraud Is Obviously Prohibited
- Apellis Prohibits Insider Trading
- We Protect Confidential Information & Intellectual Property
- We Safeguard Apellis' Intellectual Property
- Apellis Mitigates Cybersecurity Risks
- We Are Committed to Ethical Financial Practices

We Are Transparent about Conflicts of Interest

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 transparently disclosed to and approved by your manager, Ethics & Compliance and/or Human Resources through our **Conflict of Interest disclosure tool**.



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 without providing disclosure of that potential conflict of interest to the Company. While many types of potential conflicts are described below, you should always discuss with your manager or seek guidance from Legal, HR or Ethics & Compliance if you are unsure about your individual situation.

Apellis Principle

We prioritize Apellis' interests and are transparent about potential conflicts.



Let's take a closer look

Perceived or actual conflicts of interest can happen when a transaction or activity:

- Is contrary to the best interest of Apellis or somehow disadvantages 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.

We Are Transparent about Conflicts of Interest

We Do What's Right

Apellis employees must:

- Ensure that every business decision prioritizes Apellis' best interests
- Communicate with your manager, Legal, HR or Ethics & Compliance regarding situations that could be seen as potential conflicts of interest
- Anticipate and take proactive steps to avoid any situation where your interests or those of a family member may conflict with Apellis' interests
- Stay vigilant for circumstances that may create a conflict of interest

Competing interests can include anything that may influence a decision-maker's judgment.

Some examples include but are not limited to:

Financial interests: 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: Providing consulting services for, being employed by or serving as an officer, board member or director of another company that has a relationship with Apellis, including competitors, vendors, customers or suppliers.

Business and financial transactions:

- Conducting transactions on behalf of Apellis with an entity that employs an immediate family member.
- 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 nonpublic 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.

Nonbusiness 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 to facilitate activities that are not approved by the Company or are unrelated to the business of the Company.



? What If

Q: What if I am offered a consulting engagement for a company that operates in the same space as Apellis?

A: You must disclose the potential conflict of interest to your manager, HR and Compliance through the **Conflicts of Interest disclosure tool**. To move forward with the arrangement, you must obtain approval.

We Use Company Resources & Assets Appropriately

Company resources and assets are to be primarily used for work purposes.

We are entrusted with Company assets and are personally responsible for protecting them and using them with care. Company assets include funds, facilities, equipment, information systems, intellectual property and confidential or proprietary information.

In addition, Company assets include the network, computers, software, email, phone and other electronic communication media and hardware provided to you or reimbursed by Apellis (collectively, "computer systems"). It is important to recognize that **you should not have any expectation of privacy when you use Apellis computer systems.** When you use Apellis computer systems, you understand and agree that Apellis will monitor and access these systems and equipment for lawful purposes, such as enforcing this Code and Apellis policies and to comply with legal obligations, defend and enforce legal claims and protect its property and confidential information. Such **monitoring may permit the Company to review, access and share content of business emails, instant messaging, text messages and other forms of electronic information** for these purposes. All business communications and information transmitted

by, received from or stored in these systems are Company records and property of Apellis. To the extent you use Apellis computer systems for incidental personal purposes as an additional benefit of employment, you should identify these documents and communications as personal and store them separately from business information.

For more information, please see the *Global Acceptable Use Policy* and the *Global Bring Your Own Device Policy*.

We Do What's Right

Apellis employees are to **use software authorized by the Apellis Information Technology team** and may not make any unauthorized changes to Apellis computer systems.

Apellis employees are responsible for reporting the loss or theft of Apellis computer systems or resources to the IT Help Desk. 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.

? What If

- Q:** What if I use my personal computer or iPad for work matters?
- A:** No, you should not use your personal computer or iPad for Apellis matters. Only your Apellis issued laptop and/or iPad and network repositories (e.g., OneDrive) should be used for work matters.
- Q:** If I use my personal cell phone for work, does that give Apellis the right to review my information?
- A:** Yes, if you use your personal cell phone to conduct work for Apellis, Apellis has the right to review information on that device in connection with legal proceedings or investigations.

! Remember

Any **personal** use of Company computer systems is **discouraged**. However, where permitted, personal use of Company computer systems should be kept to a **minimum** and **not interfere with productivity or work**.

Apellis Maintains Accurate Books & Records



As Apellis is a publicly traded company, recordkeeping is extremely important. In addition, accurate financial records help us make smart decisions and provide truthful and timely information to external parties who request this information, such as the government or other regulatory bodies. To ensure that we are providing full and accurate information to the public and financial community, we must:

- Provide timely and accurate disclosures on Apellis business matters in the reports we provide to regulatory agencies and investors,
- Prepare honest and meaningful financial plans, forecasts and analyses of business activities,
- Maintain complete, reliable, detailed and accurate financial books and records in all material respects,
- Comply with and enforce all relevant Company financial policies, procedures and training,
- Take all reasonable measures to protect the confidentiality of nonpublic information relating to the Company,



Let's take a closer look

Record Retention

Apellis retains **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.

- Never take, directly or indirectly, any action to coerce, manipulate, mislead or fraudulently influence the Company's independent auditors in the performance of their audit or review of the Company's financial statements,
- Maintain internal controls over our financial reporting to reasonably prevent fraud and deception, and
- Conform to generally accepted accounting principles.

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. Falsifying records or accounts and omitting facts may constitute fraud.

We Do What's Right

Apellis are expected to:

Maintain accurate records: Ensure all business records are accurate, detailed and timely. Store them in an accessible location so they can be found, even after you leave the Company.

Ensure compliance: Follow all applicable laws, as well as Apellis' policies and procedures, when handling expense reports, business records or information provided to any payor or government agency.

Not abuse Company funds: Never use Company funds or Company credit cards for personal expenses. If you are a manager, carefully review all expense reports and pay close attention to any unusual transactions or exceptions.

Carefully communicate: Be mindful in your business communications. Write as though the records you create could one day become public documents.



What If

- Q:** What if my manager tells me I should backdate a payment so that it appears as if we received more money in a certain quarter? What should I do?
- A:** You must promptly report this request to the CFO, Legal, Ethics & Compliance or the [Apellis Listens Hotline](#). Accurate books and records are fundamental legal requirements for a public company like Apellis. To avoid serious consequences for the Company and potentially you and your manager, swift action is required.

Fraud Is Obviously Prohibited

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



Apellis Principle

Fraud is strictly prohibited at all levels, in any form.



Let's take a closer look

Examples of Fraud

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

Apellis Prohibits Insider Trading

Apellis prohibits all of our officers, directors, employees, consultants and contractors, as well as their family members from trading securities, or disclosing or passing along information to others who then trade (i.e., “tipping”) on the basis of material, nonpublic information. This prohibition applies at all times.

The simplest rule is to not talk about any Apellis business 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 nonpublic, 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 can result in disciplinary action, including termination for cause. Additionally, violations of insider trading laws may expose the employee and Apellis to serious civil and criminal penalties, 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 preexisting 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.

There may be periods of time where Apellis stock cannot be bought or sold, known as “blackout periods.” These are put in place to protect Apellis employees from trading in stock during sensitive times, namely when you're likely to have access to material, nonpublic information (generally two weeks before quarter- or year-end until a few business days after public earnings release, but also at other times when circumstances warrant).

Employees are permitted to trade in Apellis securities when no blackout period is in effect. You may not trade in the blackout periods following the end of a fiscal year or quarter or when there are special circumstances precluding

What is material, nonpublic information?

Material information: Information is material if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy or sell a security.

Nonpublic information: Information that is not generally known or available to the public. Information is considered available to the public only when it has been released broadly to the marketplace (such as by a press release or a Securities Exchange Commission (“SEC”) filing) and the investing public has had time to absorb the information fully.

trading. Please observe all blackout periods. However, also remember that even during these open trading windows, trading while in possession of material, nonpublic information is always a violation of the *Apellis Insider Trading Policy* and this Code.

Apellis Prohibits Insider Trading



? What If

Q: What if I learn of a potential important licensing deal because of my work here at Apellis and want to trade in Apellis stock because I need the money for personal reasons?

A: The licensing deal could constitute material, nonpublic information for the Company. To trade Apellis stock while you have this information, you must not be in a blackout period and you must check with the General Counsel as to whether it is permissible to trade.

We Do What's Right

- Do not trade during designated "blackout periods" unless under a valid 10b5-1 trading plan and only if you have been notified of such restrictions.
- Refrain from engaging in hedging transactions, short sales, trading on margin or pledging transactions related to Apellis securities.
- Do not trade Apellis securities if you possess material, nonpublic information about the Company. This restriction also applies to securities of any other company if you have material, nonpublic information obtained during your work at Apellis.
- Preclear all transactions involving Apellis securities in accordance with the ***Apellis Insider Trading Policy***. This includes open market purchases or sales, as well as the sale of Apellis securities received as equity compensation.



Let's take a closer look

What is material information?

Information is material if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy or sell a security. Common examples of information that may be considered material are:

- prescription and product sales information;
- projections of future earnings or losses or other financial guidance;
- financial results;
- clinical trial data;
- a pending or proposed merger, acquisition, tender offer, joint venture, licensing arrangement or an acquisition or disposition of significant assets;
- a change in management;
- major events regarding Apellis' securities, including the declaration of a stock split or the offering of additional securities;
- severe financial liquidity problems;
- actual or threatened major litigation or the resolution of such litigation; and
- new major contracts, orders, suppliers, customer or financing sources or the loss of any of them.

We Protect Confidential Information & Intellectual Property

Apellis commits substantial resources to medical and scientific developments and innovation.

Confidential information is generally nonpublic information that we know as a result of our position or work for Apellis and can include our marketing strategies, customer lists, pricing information, business or development plans, research results, new product launch information, pending personnel announcements, drug candidates, drug formulations and patent or intellectual property strategies.



Let's take a closer look

Confidential information includes:

- Scientific research and development; unpublished patent applications; and financial, business or technical information
- Information and reports related to clinical trials
- Raw efficacy data and associated readouts, protocol and safety events
- Statistical analysis, "top-line readouts" and draft press releases
- Business and sales strategy
- Employee, customer and supplier lists/details

Intellectual property is something intangible, such as an idea, a process or an invention, and includes, for example, patents, inventions, know-how, systems, software, data, claims, messages, technology, trademarks, service marks, copyrighted materials and trade secrets.

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 are expected to take precautions to protect Apellis assets, such as the Company's confidential information and intellectual property. This includes limiting access to the information to those who need to know to do their job, storing and using the information carefully



Remember

- Curious strangers inquiring about Apellis and its business, clinical trials and management
- Phishing attempts to hack into your email
- Cold calls from the media or investing community
- If you're not sure, keep it to yourself — better safe than sorry!

Apellis Principle

Confidentiality is KEY.

and ensuring that agreements are in place with third parties to protect the information. Remember that Personal Information of our customers, patients and other individuals is confidential too. Therefore, extend the same high level of care to protect their information.

We Do What's Right

- Use confidentiality agreements with third parties if Apellis' confidential information may be discussed
- Avoid discussing confidential or proprietary information in public places (including within the office!)
- Avoid inadvertent disclosure of confidential information to family and friends
- Maintain the confidentiality of confidential information received from third parties under confidentiality agreements

We Safeguard Apellis' Intellectual Property



Apellis' intellectual property ("IP") rights are valuable assets for the Company. Everyone shares the responsibility in protecting the Company's IP. IP can include a variety of things such as trademarks, patents, know-how, scientific data, messages and claims. Please contact the Legal Department:

- Prior to sharing IP with any third party, including with government agencies, publishers, collaboration partners or the public.
- With any third-party questions you receive regarding IP or IP rights.

Neither of the above lists are exhaustive, therefore it is safer to err on the side of caution in any instance.

Be aware that the obligation to restrict your use of Apellis confidential information and IP continues even after employment ends.

Apellis Mitigates Cybersecurity Risks

Apellis strives to protect the confidentiality, integrity and security of its data, confidential information and Personal Information. Access to sensitive, proprietary, confidential and Personal Information will be limited to only those with a need to know and the least level of privilege necessary to perform their assigned functions.

To ensure confidentiality, Apellis is committed to providing technical, administrative and physical safeguards from unauthorized access, use, disclosure, alteration, destruction or theft of information systems. All applicable information security policies and procedures must be followed. Apellis may inspect, monitor and control the Company's computer systems to protect Apellis information.

We Do What's Right

Protecting Apellis's Computer Systems and Information

To safeguard Apellis's computer systems, confidential information and Personal Information, please follow these guidelines:

Prohibited content: Do not download, store or transmit prohibited content on Apellis' computer systems. This includes intellectual property— infringing or pirated files, discriminatory or unlawful material, viruses, Trojan horses, malware, adware or any other prohibited content as outlined in Apellis's policies.

Password security: Maintain a secure, unique password for each system you use, and do not share your password with others.

Approved tools: Use only software, hardware and cloud services that have been approved by the Information Technology group.

Sharing information: Share Personal Information only with authorized parties and ensure it is done securely, in accordance with the *Global Acceptable Use Policy* and the *Global Privacy Policy*.

Reporting breaches: Immediately report any data breach or suspected data breach to the Head of Information Technology. Please see the *Global Data Breach Response Procedure* for more information.



We Are Committed to Ethical Financial Practices

At Apellis, **We Are Resourceful** is a core value that underpins our integrity, accountability and commitment to ethical financial practices. By adhering to these principles, we safeguard the organization's financial health and foster trust among stakeholders.



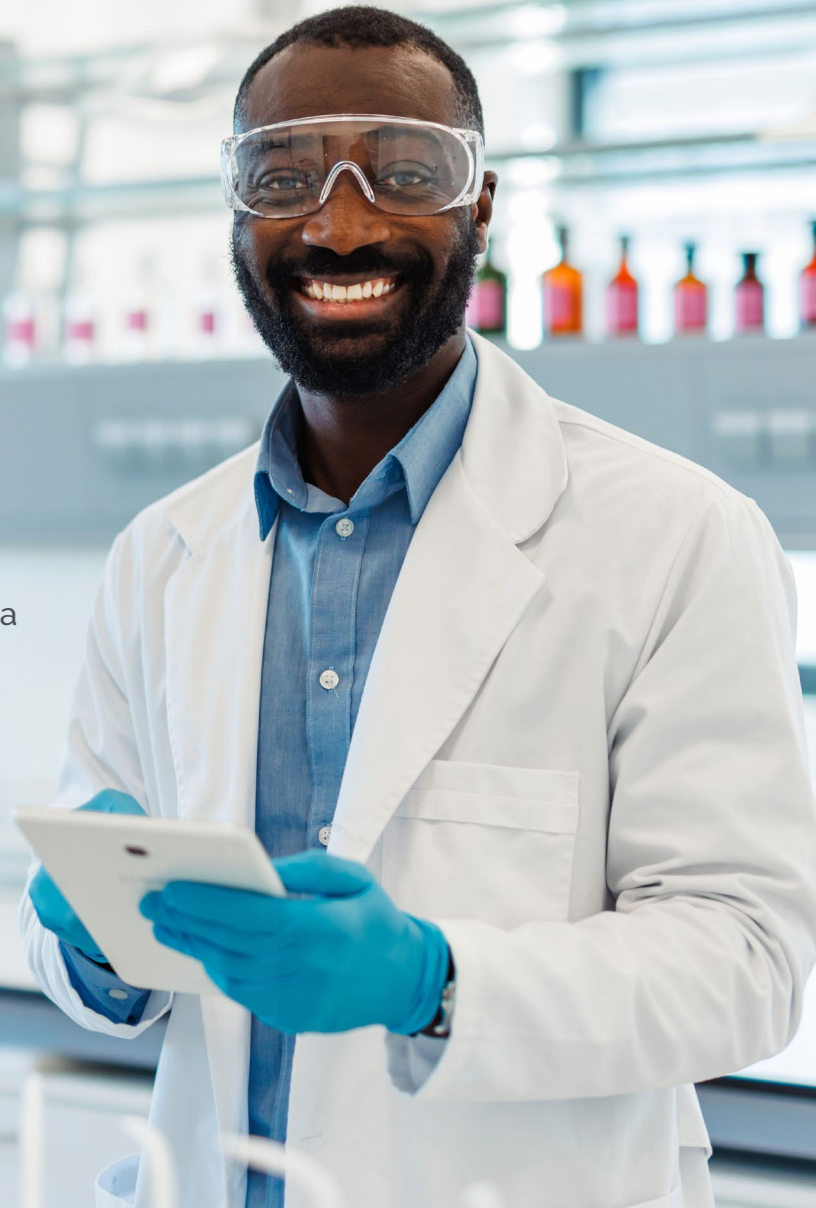
Our Key Principles

- 1. Financial Integrity**
Employees must ensure that all financial transactions, reporting and documentation are accurate, truthful and fully compliant with Company policies and regulatory requirements.
- 2. Prudent Use of Resources**
We challenge ourselves to do things in the most agile and efficient way. Company resources should be used responsibly, avoiding unnecessary expenditures, inefficiencies, fraud or misallocation of funds.
- 3. Regulatory Compliance**
Employees must comply with all applicable financial laws, tax regulations and internal Company policies as outlined in our Code of Conduct. Any suspected violations should be promptly reported.
- 4. Fair & Transparent Supplier Sourcing**
Supplier selection must be conducted fairly, transparently and competitively, in accordance with our Procurement Engagement and Sourcing Policy to ensure ethical partnerships.
- 5. Transparency & Accountability**
Employees must maintain clear and honest financial records, ensure proper authorization for expenditures and avoid conflicts of interest that could compromise financial decisions.
- 6. Confidentiality & Data Protection**
Sensitive financial information must be protected from unauthorized access, disclosure or misuse, in line with Company confidentiality policies.
- 7. Reporting Misconduct**
Employees are encouraged — and expected — to report any financial irregularities, unethical behavior or policy violations to their manager, HR, Legal, Ethics & Compliance or the Ethics & Compliance Hotline, **Apellis Listens**, with full assurance of protection against retaliation.

We Love What We Do

We are passionate about our work, our purpose and the positive impact we can make.

- We Respect Scientific Integrity & Ethical Research
- We Engage in Responsible Communication & Social Media
- Apellis Commits to Product Quality & Prompt Reporting



We Respect Scientific Integrity & Ethical Research

At Apellis, we aim to transform treatment across a broad range of debilitating diseases driven by complement. Conducting clinical and preclinical research in an ethical and compliant manner is critical to the success of our products, our Company and our patients. It is the foundation for everything we do.

Apellis complies with all applicable clinical trial laws and regulations, such as the International Conference on Harmonization Guidelines, Good Clinical Practice (GCP) and Good Laboratory Practice (GLP). We also comply with local laws and standards in countries where we are conducting research. In addition, we are committed to maintaining the integrity and quality of our research data to ensure that our regulatory submissions are accurate and complete. Apellis is transparent about its clinical data and its involvement in research publications in accordance with applicable laws and regulations and industry standards, such as the International Committee of Medical Journal Editors ("ICMJE").

Before undertaking any clinical research, we ensure that we have appropriate subject consent and any necessary institutional review board or ethics committee approvals. We hold our vendors (e.g., CROs) to the same high standards.

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 are consistently prioritizing advancing alternatives to animal research. As we develop our products, we are dedicated to the humane, ethical and responsible treatment of animals used in the development of our products. Our vendors are required to comply with all of our standards related to the treatment of animals.

We Do What's Right

Apellis will **not** tolerate **research misconduct of any kind**, whether performed by the Company or by vendors or collaborators performing research on behalf of Apellis. That includes:

Fabrication or fraud: Making up data or results and recording or reporting the fabricated information;

Falsification: Manipulating processes, research materials or equipment or omitting or altering results or data misrepresenting the research; and,

Plagiarism: Taking and using someone else's work, ideas, processes, results or words without crediting them.



Whom do I contact with concerns related to clinical conduct?

Any concerns related to clinical conduct or preclinical research should be reported to the Head of Quality.

We Engage in Responsible Communication & Social Media

Only authorized individuals are allowed to speak on behalf of Apellis. Communication with investors and members of the financial community must be referred to Investor Relations. Communication with media must be referred to Corporate Communications. This includes any questions related to sales, financial results and strategies of the Company. All public speeches related to Apellis must be approved prior to the activity by an authorized spokesperson for Apellis.

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 online forums, each Apellis employee has the responsibility not to give the impression they are speaking on behalf of Apellis unless they have authorization to do so.

As an Apellis employee, you are subject to many restrictions related to your use of social media related to Company-approved products and those in development, as well as your interactions with HCPs and patients. We ask that each Apellis employee uses good judgment, whether engaging via your own personal profile or Company-related social media.

Who is an authorized spokesperson for Apellis?

Apellis employees who are authorized to communicate on behalf of the Company with (including responding to inquiries from) the media, market professionals (e.g., securities analysts, institutional investors, investment advisers, brokers and dealers) and security holders include only the following individuals: (a) the Chief Executive Officer; (b) the Chief Financial Officer; (c) the Chief Commercial Officer, (d) the SVP of Investor Relations, (e) the Chief Medical Officer, (f) the General Counsel; (g) the VP Corporate Communications and (h) such other persons as the Chief Executive Officer may designate from time to time.

Apellis Principle

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



We Engage in Responsible Communication & Social Media

We Do What's Right

Apellis-issued posts: Only Corporate Communications is allowed to create posts regarding:

- Apellis products
- Disease awareness
- Financial news

Personal social media accounts: Employees are allowed and encouraged to use their own social media to create:

- Their own corporate culture posts
- Job-related social media posts

Product-related posts: Can be "liked" only in the U.S. Sharing & commenting on product-related posts is only permitted if #WeAreApellis is included in the original post. Outside the U.S., the rules are stricter regarding product-related posts by Apellis, and it is prohibited to interact with any posts regarding Apellis products. If no Apellis products are mentioned, use good judgment.

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 Global Social Media Policy.

Apellis respects your right to communicate on your own (or other employees') behalf concerning terms and conditions of employment. Nothing in this policy is intended to interfere with your rights under federal and state laws, including the National Labor Relations Act (NLRA), nor will Apellis construe this policy in a way that limits such rights.

If you have any questions, please contact Corporate Communications.



Let's take a closer look

What exactly does "good judgment" 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



Remember

- **Be transparent** about your relationship with Apellis
- Protect Apellis **confidential information and data**
- **Obtain consent** before posting photos of anyone
- **Report any adverse events or product complaints** to medinfo@apellis.com
- Whether you can interact with Apellis-issued posts varies by country. Before you like, share or comment on Apellis-issued posts, please have a look at our **Global Social Media Policy**.

Apellis Commits to Product Quality & Prompt Reporting

We comply with all laws and regulations and have a robust process in place for handling any adverse events or quality complaints that arise from the use of our products. If anything is brought to your attention, regarding either the product itself or an adverse event that has been experienced by a user, you must report it. Adverse events must be reported within 1 business day, and product complaints must be reported within 1 calendar day of learning of the event.

What is an adverse event (“AE”)?

An adverse event (AE) is defined as any untoward medical occurrence in a patient administered an Apellis product, whether or not considered drug related.

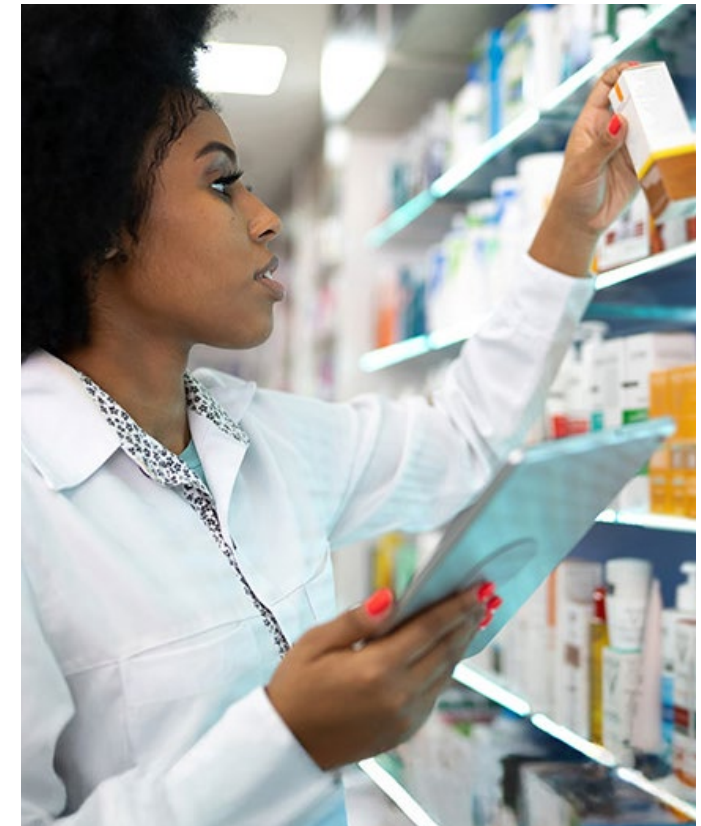
Special situations require reporting to Apellis, regardless of whether they are associated with an AE.

These include:

- Overdose — quantity above maximum recommended dose
- Underdose — lower dose administered than recommended dose
- Pregnancy exposure/breast feeding, or paternal exposure
- Off-label use — intentional use for purpose not according to label indication
- Misuse — intentional and inappropriate use not in accordance with label
- Abuse — intentional excessive use accompanied by harmful physical or psychological effects
- Occupational exposure — exposure as a result of one’s occupation
- Medication error — unintended failure in treatment process that leads to or has potential to lead to harm to the patient
- Falsified medicinal product — false representation of product’s identity, source or history
- Reports of transmission of an infectious agent through a contaminated Apellis product
- Failure to produce expected benefits (i.e., lack of efficacy)
- Unexpected therapeutic benefit — unexpected improvement in concurrent condition other than the one being treated

Apellis Principle

Patient safety and product quality are at the heart of what we do.



Apellis Commits to Product Quality & Prompt Reporting

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

- 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 of product complaints include tablets with an unexpected color, appearance or particles, missing/illegible labeling, inability to administer the product or the product didn't work as intended.

Manufacturing

Apellis complies with all applicable manufacturing laws and requirements, including those related to product storage and distribution and Good

Manufacturing Practices. Apellis requires that all our suppliers and manufacturing partners adhere to these same standards. In order to ensure that suppliers and manufacturing partners meet Apellis' standards, we maintain the proper oversight of our manufacturers.

We Do What's Right

Apellis inspires trust by delivering on our promises and ensuring that all our standards remain at the highest level. We do this by:

- Following all applicable laws, regulations and industry codes
- Maintaining appropriate oversight over our internal operations and processes, as well as those of our vendors and third parties
- Properly testing Company products to ensure that they meet the highest quality

How do I report an AE or PCs?

Report any AE within 1 business day of receipt and/or PCs within 1 calendar day of receipt to medinfo@apellis.com or by calling 1-833-866-3346. For additional information, please refer to SOP-0145 (Reporting Adverse Events and Product Complaints)



? What If

Q: What if you are at a friend's house for an event, and their mother mentions they are actively taking an Apellis marketed product. Their mother indicates that shortly after starting their most recent dose of the product, they experienced an itchy rash on their arms and legs. Recognizing this could be an adverse event, when do you report this to Apellis?

A: Within 1 business day.

We Are Fearless

We take risks and push ourselves to be more productive and innovative.

- We Will Speak Up & Report Suspected Violations
- Apellis Does Not Allow Retaliation
- We Are Accountable
- Concerns Must Be Raised in Good Faith
- We Will Cooperate in Investigations & Inquiries



We Will Speak Up & Report Suspected Violations

Difficult situations can arise, and we want you to have the resources and guidance you need to navigate them with integrity and support.

Our commitment to ethics and integrity is about more than following policies; it is about how we engage with one another every day. We all play a role in ensuring that Apellis remains an environment where employees feel safe enough to speak up and ask questions, raise concerns and even report potential wrongdoing. If you have a compliance concern, please reach out to your manager or any member of the Ethics & Compliance team or the Legal Department. For matters related to employee relations, your HR Business Partner or any member of the Human Resources Department is available to assist.

Please note that any manager who receives a compliance report must report this concern to Ethics & Compliance. For more information, please refer to the *Global Compliance Reporting & Investigations Policy*.

Additionally, **Apellis Listens, our Ethics & Compliance Hotline**, is our anonymous reporting tool, operated by an independent third party. It allows employees, contractors and individuals outside of Apellis to confidentially report compliance or ethics concerns. Please provide as much information as possible so we can investigate fully, efficiently and effectively.

Ethics & Compliance Hotline Contact Information

Apellis Listens, our Ethics & Compliance Hotline, can be accessed either via the internet or via phone as detailed below. Please save this contact information with you in case you need to use it in the future.

- 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
 - United Kingdom: 0800 048 5484
 - United States: 1-844-782-0340

Apellis Principle

We recognize that issues are not always clear-cut.

We want to make sure that our company is a great place to work, and hence it is our duty to report concerns of illegal or unethical conduct.





What Happens When I Call the Hotline?

Independent third party: An independent third-party organization manages the Apellis Ethics & Compliance Hotline. It confidentially receives questions and concerns and promptly forwards them to a select few in the Company for follow-up.

Remaining anonymous, where possible: When you reach out to the Hotline, you have the option to remain anonymous. If you choose to disclose your identity, the Company will take every reasonable precaution to protect your confidentiality while ensuring a thorough and fair investigation. All reports are handled professionally and with as much confidentiality as possible.

Be truthful: To facilitate an effective investigation, we encourage you to provide truthful information and as much detail as you can about the incident (e.g., date, persons involved, witnesses, etc.).

Identification number: Once you submit a report, you will receive an identification number via the Hotline. This number allows you to follow up on your concern and is particularly important if you report anonymously, as additional details may be needed to conduct a comprehensive investigation. You can also use the identification number to track the resolution of your case.

Response to report: Even if you submit a report, please be aware that, to respect the privacy of others, Apellis may not disclose specific actions taken in response to your report.

Apellis Does Not Allow Retaliation

Apellis will not tolerate retaliation against any Apellis employee who has in good faith made a report or complaint 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. If anyone is found to have engaged in retaliation against an individual who has raised a concern in good faith about a potential violation of the law, the Code or Apellis policies, the person who engaged in the retaliation will be disciplined.

Apellis Principle

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.



Let's take a closer look

Retaliation includes:

- Any adverse action taken against an employee because the employee makes a good-faith complaint or participates in an investigation, including without limitation, demotion, denial of promotion, suspension without pay, termination, reduction in pay or benefits or fostering a hostile work environment.
- 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.
- Any decision or conduct that may be taken with the intent to discourage an Apellis employee from submitting a complaint or cooperating in an investigation.



We Are Accountable



We Do What's Right

Violating this Code, our policies or the law, or encouraging others to do so, exposes our Company to potential liability and puts Apellis' reputation at risk. If you suspect that there is any illegal or unethical activity, you must report it so that we can look into whether this activity puts the Company, our employees and others at risk and if so, what corrective actions need to be taken.

After our investigation has been conducted, any individual found to have violated the Code, law or Company policy may be subject to corrective action, which might include coaching, training or discipline up to and including, in the case of employees, termination of employment.

We may need to report conclusions of wrongdoing that violate applicable laws to governmental authorities. Some violations of law may also result in

? What If

Q: What if I report a suspected violation of law or this Code and my manager uses it against me in my performance review?

A: At Apellis we do not tolerate any retaliation, harassment or retribution against a person who in good faith has reported a potential violation of law, the Code or our policies. Therefore, if you feel that you have been retaliated against for reporting a potential violation of law, you should contact Legal or Compliance. In this case, the manager would be investigated and if found to have engaged in retaliation, would be disciplined, including potential dismissal from Apellis.

civil or criminal liabilities for the Company and for the individuals involved.

In addition, the Company may 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. For more information, please refer to the *Global Compliance Reporting & Investigations Policy*.

Concerns Must Be Raised in Good Faith

Apellis recognizes the potentially serious impact of an accusation on the person who has been accused and those involved. In many instances, raising questions or concerns about a proposed course of action directly with involved colleagues results in a fruitful discussion where alternative ideas are explored, context is shared and risk for the Company is mitigated. However, in some instances, employees may not feel comfortable raising these concerns directly, or employees learn of problematic actions after they have occurred and the opportunity to change course is not available. In these instances, we encourage employees to reach out for guidance to a manager, HR, Ethics & Compliance or Legal.

It is important to understand that making a complaint or report about an Apellis employee potentially violating the law, this Code or an Apellis policy or training without a true, good-faith basis is itself a violation of the Code that could 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. However, prompt reporting

and forthright disclosure can serve as a mitigating factor in the determination of consequences. Additionally, reporting suspected wrongdoing does not alter an employee's at-will status or insulate an employee from accountability under performance management procedures.

For more information, please refer to "Reporting Suspected Violations of the Code." You may also refer to the ***Global Compliance Reporting & Investigations Policy***.

Apellis Principle

All reports of wrongdoing should be made in "good faith." This means that you should report accurate and truthful information about concerns, even if it is later found to be a mistake or unsubstantiated. You should not report a concern simply as a way to damage someone's reputation or retaliate against them.



We Will Cooperate in Investigations & Inquiries

All Apellis employees are expected to fully cooperate with any audits or investigations conducted by Apellis or its delegates. In addition, Apellis will cooperate with any external investigations or legal proceedings.

Legal proceedings, complaints, government investigations: If you are contacted by regulators, government officials or lawyers, or asked to provide information in connection with a legal proceeding, complaint, subpoena or notice of noncompliance or government investigation, you should immediately contact the Legal Department for assistance. The Legal Department will work with you to respond to any of these requests. All responses should be truthful. These types of internal and external investigations are confidential and should not be discussed with other internal or external individuals unless specifically approved by the Legal Department to do so or as otherwise required or permitted by law.

Inspections: If you receive inquiries or requests from lawyers, government officials or regulators related to an inspection, you are expected to fully cooperate with the requests and in accordance with Company policies and procedures and should immediately contact the Legal and the Quality Departments for assistance. Inspections may include those from health authorities to ensure that our processes are

compliant with GCP, Good Manufacturing Practice (GMP) or GLP.

Record retention: It is important that Apellis employees comply with any legal hold notice that they receive. Apellis may receive litigation, investigation or other related requests that include documents that must be retained longer than their standard retention period(s). Documents requested may include emails, memos, text messages, voicemails or other materials. Documents related to these activities should never be destroyed, altered or concealed if there is an anticipated legal hold or request for such documents. If you are unsure whether a legal hold applies to a particular document, you should err on the side of preserving the document or consult with the Legal Department. Please refer to the **Global Legal Hold Policy** for more information.

We Do What's Right

You should never provide or attempt to influence others to provide any information or statements that are false, incomplete or misleading to either an internal or external investigator.

Whom do I contact if I receive a request related to an investigation?

Please contact the Legal Department with any questions about investigations. They will be able to guide you in answering questions for the specific type of request you have received.



Apellis

Code of Conduct

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