

APELLIS GLOBAL COMPREHENSIVE COMPLIANCE PROGRAM POLICY

I. PURPOSE

At Apellis, compliance matters. We have established a Comprehensive Compliance Program to set the standards for how we conduct business with integrity and to communicate to employees and other stakeholders our expectations for ethical business practices and operating according to our shared values.

We have created this Comprehensive Compliance Program Plan based on the seven elements of an effective compliance program as outlined in the Compliance Program Guidance for Pharmaceutical Manufacturers issued in 2003 by the Office of the Inspector General of the Department of Health and Human Services (“OIG Guidance”).

As the OIG Guidance envisions, Apellis has designed its Compliance Program to fit the size, resources, and other unique aspects of our organization. Apellis also recognizes that an effective compliance program must evolve and respond to the changing circumstances of the organization and the compliance, legal and regulatory environment.

Although not a member of the Pharmaceutical Research and Manufacturers of America (“PhRMA”), Apellis supports and has implemented policies and procedures that are consistent with the requirements of the PhRMA Code on Interactions with Healthcare Professionals originally published on July 1, 2002, and last revised as of January 2022 (the “PhRMA Code”).

II. SCOPE

Apellis Personnel and Contractors are expected to comply with the Apellis Code of Conduct, the PhRMA Code, and all compliance policies and procedures applicable to their function and activities performed on behalf of Apellis.

III. COMPREHENSIVE COMPLIANCE PROGRAM

1. Written Standards

Apellis’s Code of Conduct establishes key ethical principles that all Apellis Personnel and Contractors, officers and directors of the Company must follow, as well as standards to help ensure compliance with applicable laws and company policies.

In addition to the Code of Conduct, Apellis has developed and implemented policies, procedures, guidelines, and other business rules to address potential risk areas for pharmaceutical manufacturers.

2. Governance and Oversight

Apellis’s Board of Directors has designated its Compliance Committee to establish expectations, oversee, and evaluate the effectiveness of the Compliance Program.

a. Apellis has designated a Vice President, Global Chief Compliance Officer (“Chief Compliance Officer”) who is responsible for the development and oversight of the operation of the Compliance Program. The Chief Compliance Officer has the authority to exercise appropriate professional judgment regarding the Compliance Program, and to develop and implement revisions and improvements as needed to maintain an effective Compliance Program. The Chief Compliance Officer reports on a regular basis to the Compliance Committee, the Chief Executive Officer and to the General Counsel regarding the operations of all elements of the Compliance Program, including alleged violations and remedial or disciplinary measures.

b. Apellis has also established a Corporate Compliance Committee. This cross-functional team of senior leadership is charged with providing oversight regarding significant healthcare-related regulatory and compliance issues and assisting and supporting the Chief Compliance Officer in the development, implementation, and maintenance of Apellis’s Compliance Program.

3. Education and Training

Apellis is committed to developing and delivering effective compliance training. All new Apellis Personnel and Contractors receive compliance training, inclusive of training regarding Apellis's Code of Conduct and compliance-related policies, procedures, guidelines, and business rules applicable to their job functions. Apellis periodically reviews and updates its training programs to reflect changes in standards or laws and identified risks for the Company.

4. Employee Communications and Reporting

Apellis is committed to fostering an open dialogue between management and employees regarding compliance-related matters. Apellis Personnel and Contractors are encouraged to seek guidance from the Chief Compliance Officer, the General Counsel, any executive committee member, their manager, or Human Resources.

Apellis has adopted policies that require Apellis Personnel and Contractors to promptly report known or suspected compliance violations. Persons making good faith reports are protected from retaliation. Reports may be made to the Chief Compliance Officer, the General Counsel, an executive committee member, a manager, or Human Resources. Any manager who receives a compliance report from a subordinate must report the concern to the Compliance Department. If these individuals are not available or if the reporter prefers, reports of violations, including those from outside the company, may be made on an anonymous basis via Apellis's Ethics and Compliance Hotline. Access is available 24 hours a day, 7 days a week at +1- 844-782-0340 or via <https://Apellis.ethicspoint.com>

5. Auditing and Monitoring

To measure the efficacy of Apellis's training and education program, as well as to confirm that Apellis Personnel and Contractors are acting in an expected compliant manner, Apellis will periodically perform monitoring activities and conduct audits to evaluate compliance with company policies and applicable laws. The nature, frequency and extent of these reviews may vary according to factors such as internal risk assessments, regulatory requirements and developments, and changes in Apellis's business practices.

6. Enforcement and Discipline

Apellis maintains policies and procedures for addressing potential compliance-related violations. These policies and procedures are intended to ensure that relevant facts and circumstances are understood and considered in connection with all enforcement and disciplinary activities, and that appropriate and consistent action is taken to address inappropriate conduct and deter future violations.

7. Corrective and Preventative Action Plans

Apellis maintains detailed policies and procedures that guide the Company to respond promptly to potential violations of law or Apellis policy, take appropriate disciplinary action, assess whether the violation may be due to gaps in our policies, training, practices, or internal controls, and take appropriate corrective action to prevent or limit future non-compliance.

8. California Health and Safety Code §§ 119400 – 119402 Declaration

Apellis declares that to the best of its knowledge, and based upon a good faith understanding of California Health & Safety Code Sections 119400-119402 (the "California Statute"), Apellis (1) has established a Comprehensive Compliance Program that is reasonably designed to prevent or detect and address misconduct and that encompasses the compliance program requirements set forth in the California Statute and in the PhRMA Code, and (2) is in compliance with its Comprehensive Compliance Program and the California Statute.

Apellis’s Comprehensive Compliance Program is intended to be a dynamic program designed to meet the company’s evolving compliance needs. Accordingly, Apellis will at least annually review and as needed, modify its Comprehensive Compliance Program to enhance its effectiveness.

9. California Annual Spending Limit

As part of Apellis’s interactions with Healthcare Professionals (“HCP’s”), Apellis may provide Meals, promotional Materials, Educational Items, or other items. Apellis has adopted an annual dollar limit of \$2,000 per individual California HCP for appropriate items. This limit is a maximum amount and is neither an average nor a targeted spending limit. The annual limit may be revised as deemed appropriate by Apellis.

The annual spending limit set forth in this declaration does not include the value of:

- a. Free drug samples given to physicians and healthcare professionals intended for distribution to patients.
- b. Financial support of independent education including continuing medical education forums.
- c. Financial support for health education scholarships complying with the OIG Guidance and the PhRMA Code, and;
- d. Payments made for legitimate professional services provided by an HCP so long as the amount paid is based upon the fair market value of the services provided.

10. Availability of Comprehensive Compliance Program

If you would like to receive a printed version of this Annual Declaration of Compliance and/or Apellis’s Code of Conduct, you may do so by contacting the Compliance team at compliance@apellis.com or by calling the Apellis Corporate Headquarters at (617) 977-5700 and ask to be connected to the Chief Compliance Officer. Please state that you are requesting a printed copy of Apellis’s annual Declaration of Compliance and/or Code of Conduct and provide your contact information, including your first name and last name, your email address or mailing address, and your phone number.

IV. VERSION HISTORY

VERSION	DATE EFFECTIVE/REVISED	REASON FOR REVISION
1.0	May 31, 2022	Initial issuance
2.0	January 19, 2023	Content and format updated
3.0	April 8, 2024	Content updated
4.0	June 12, 2025	Annual reissuance