

# Global Supplier Code of Conduct



## 1 BACKGROUND

Apellis Pharmaceuticals, Inc. and its Affiliates ("Apellis") often engage with third parties to provide goods or services to the Company or on its behalf.

## 2 PURPOSE AND SCOPE

The purpose of this Supplier Code of Conduct is to:

- Ensure that all commitments to purchase goods and or services be conducted in a consistent manner
- Ensure corporate integrity, responsible sourcing and the safety and wellbeing of workers are of paramount importance to Apellis
- Communicate and align on the principles that reflect Apellis' minimum standards and which must be met by any Supplier while conducting business with or on behalf of Apellis with respect to Ethical Business Practices, Labor, Health and Safety, Environment and Management Systems.

These principles apply to all aspects of Apellis' business, and encompass all manufacturers, distributors, vendors, suppliers, contractors, subcontractors that provide goods or services to the company or on its behalf. Please note that healthcare professionals (HCPs), patient consultants, payor consultants, government officials and clinical trial sites are out of scope.



### Ethical Business Practice

Business Integrity, Anti-Bribery, Anti-Corruption and Fair Competition

Identification of Concerns

Animal Welfare

Conflict of Interest

Trade Compliance

Supplier Diversity



### Labor

Freely Chosen Employment

Child labor and Young Workers

Non-Discrimination, Diversity

Fair Treatment

Wages, Benefits and Working Hours

Freedom of Association and Collective Bargaining



### Health & Safety

Workers Protection

Processes, Emergency Preparedness and Response



### Data Protection & Privacy

Data Privacy, Security and Confidentiality



### Environment

Environmental Authorizations

Waste and Emissions

Spills and Releases

Material Compliance



### Management Systems

Commitment and Accountability

Legal and Customer Requirements

Risk Management

Documentation

Training and Competency

Continuous Improvement



### Other

Innovation

Sustainability

### 3 INTRODUCTION TO APELLIS' SUPPLIER CODE OF CONDUCT

- Managing the environmental and social impacts of our operations, products, manufacturing and sourcing is an important part of our commitment. We work with business partners, contractors and suppliers to ensure the products we deliver are safe, effective and of the highest quality. Operating responsibly and using resources efficiently involves setting and living up to exacting standards and supporting our partners and suppliers in doing the same.
- At Apellis, we're committed to partnering with our suppliers and making positive changes along our value chain by encouraging our business partners, Contract Service Providers (CSP) to adopt responsible and sustainable practices.

### 4 APELLIS' EXPECTATIONS OF SUPPLIERS

- Apellis deals fairly, responsibly and ethically with our contractors, vendors and suppliers; we expect that Suppliers will do the same in return.
- Decisions are based on customary commercial and technical considerations.
- Suppliers must comply with the all applicable laws, rules, regulations, and ethical standards of the countries in which they operate or do business.
- For those Suppliers providing Contract Manufacturing and Testing services or services in support of these activities, all applicable Good Manufacturing (GMP), Good Clinical (GCP) and Good Laboratory Practices (GLP) (collectively GxP practices) must be followed.

### 5 ETHICAL BUSINESS PRACTICE

#### **Business Integrity, Anti-Bribery, Anti-Corruption and Fair Competition**

- Suppliers shall conduct business competitively and in full compliance with all applicable antitrust and (unfair) competition laws and regulations. Suppliers shall not fix prices or rig bids with their competitors. Suppliers shall not allocate customers or markets with their competitors, or exchange current, recent, or future pricing information with their competitors.
- Suppliers must conduct all business with integrity and in compliance with all applicable anti-bribery and anti-corruption laws, including but not limited to the **U.S. Foreign Corrupt Practices Act (FCPA)**, the **UK Bribery Act 2010**, and all relevant local laws in the jurisdictions where they operate.
- Suppliers shall:
  - **Prohibit** the offering, promising, giving, requesting, or accepting of bribes, kickbacks, or other improper advantages, whether directly or indirectly.
  - **Reject facilitation payments** (small payments made to secure or expedite routine government actions), even where they may be culturally expected.
  - Maintain **policies, procedures, and internal controls** to prevent bribery and corruption, including training for employees and subcontractors.
  - Accurately **record and report all transactions** to ensure transparency and compliance.

### Identification of Concerns

- Supplier shall provide workers access to confidential reporting channels (hotline/email) with non-retaliation assurances. Workers should be encouraged to report concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment. Suppliers shall investigate and take corrective action if needed.

### Animal Welfare

- Applicable suppliers shall strive to ensure that animals are treated humanely, with pain and stress minimized. Animal testing should only be performed after consideration to replace animals, reduce the number of animals used or refine procedures to ensure humane treatment. Alternatives should be used wherever scientifically valid and acceptable to regulators.

### Data Privacy, Security and Confidentiality

- Suppliers shall safeguard and make only proper use of confidential information and trade secrets to ensure that company confidential information and secrets are protected.
- Suppliers shall establish and maintain adequate personal data and information security protection for the information, including personal data, that they, and any third party acting on their behalf, process. This shall include, but not limited to, proper mechanisms, technical and organizational structure, processes and procedures.
- Suppliers must abide by applicable data privacy laws and regulations when handling confidential information including statutes requiring notification of breaches or unauthorized disclosure of confidential information. Suppliers must comply with applicable Apellis Data Privacy and Security policies with respect to collection, use, or retention of confidential information.



### Conflict of Interest

- A "conflict of interest" exists when your personal, social, financial, civic or charitable activities could conflict with Apellis' interests or compromise your objectivity. Apellis expects all suppliers to identify, avoid and manage conflicts of interest and notify Apellis if any actual or potential conflict of interest arises.

### Trade Compliance

- Apellis expects its suppliers to import, export and engage in all forms of trade in a legal and ethical manner.

### Supplier Diversity

- Suppliers are encouraged to report annually on engagement with diverse suppliers, including women-owned, minority-owned, and small businesses
- Apellis recognizes the value of unique and diverse perspectives from our partners and suppliers. We encourage and welcome diversity in your supplier base.



## 6 LABOR

### Freely Chosen Employment

- All labor must be voluntary. Suppliers shall not engage in or support trafficking in human beings. Slave, child, underage, forced, bonded, or indentured labor will not be tolerated. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt or employment of persons by means of threat, force, coercion, abduction, fraud or payments to any person having control over another person.

### Child Labor and Young Workers

- Supplier will not use child labor. A child is any person under age 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Young workers under the age of 18 or as defined under local laws, whichever is greatest, will not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers may use legitimate, properly managed apprenticeship programs, such as student internships.

### Non-Discrimination, Diversity

- Equal treatment of all employees is a fundamental principle.
- All terms and conditions of employment including, but not limited to, hiring, pay, training, promotion, termination, and retirement must be based on an individual's ability and willingness to do the job. Suppliers must not discriminate against any worker based on age, disability, race, national origin, ethnicity, gender, marital status, sexual orientation, political affiliation, religion or union membership.

### Fair Treatment

- Workplaces must be free of harassment and abuse. Supplier shall not threaten workers with, or subject them to, harsh or inhumane treatment, including verbal abuse, corporal punishment, mental and physical coercion and sexual harassment.

### Wages, Benefits and Working Hours

- Suppliers should strive to provide a living wage benchmarked against industry standards, not just legal minimums.
- Suppliers must comply with all applicable wage laws and regulations, including those relating to minimum wage, overtime hours, and legally mandated benefits.
- Suppliers shall follow all applicable laws and regulations with respect to working hours, overtime and days of rest.

### Freedom of Association and Collective Bargaining

- Supplier shall respect, and shall not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade union and to engage in collective bargaining.



## 7 HEALTH AND SAFETY

### Workers Protection

- Suppliers shall protect workers, and any visitors to their facilities, from exposure to chemical, biological and physical hazards. Suppliers shall monitor their workplace for any other safety hazards and provide a safe and secure environment for workers and visitors. This provision includes providing proper protective equipment and training.

### Processes, Emergency Preparedness and Response

- Suppliers shall have appropriate processes in place to identify, prevent and mitigate any risk of a chemical spill or other event that would pose a threat to worker safety and/or to the environment. These processes include emergency plans in the case of an unsafe event and response procedures should such an event occur.

## 8 ENVIRONMENT

### Environmental Authorizations

- Suppliers shall comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained, and their operational and reporting requirements followed.

### Waste and Emissions

- Suppliers shall have systems to ensure the safe and lawful handling, movement, storage, recycling/reuse or management of waste, air emissions and wastewater discharges.

### Spills and Releases

- Suppliers shall have systems in place to prevent or mitigate accidental spills and releases to the environment including but not limited to notification and communication with applicable regulatory authorities, employees and customers as appropriate.

### Material Compliance

- Suppliers shall comply with all applicable chemical regulations governing the manufacturing, distribution, handling and storage, import and sale of materials supplied to Apellis and/or used on our behalf.

### Sustainability Practices

- Suppliers shall promote sustainable practices that align with global sustainability goals including sourcing of raw materials and components and avoidance of the use of conflict minerals.



## 9 MANAGEMENT SYSTEMS

### **Commitment and Accountability**

- Suppliers shall demonstrate commitment to the concepts described in this document by allocating appropriate resources.

### **Legal and Customer Requirements**

- Suppliers shall identify and comply with applicable laws, regulations, standards and relevant customer requirements.

### **Risk Management**

- Suppliers shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable regulations.

### **Documentation**

- Supplier shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable laws and regulations.

### **Training and Competency**

- Suppliers shall have a training program that achieves an appropriate level of knowledge, skills and abilities in management and workers to address these expectations.

### **Continuous Improvement**

- Suppliers are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections and management reviews.

## 10 ADDITIONAL PRINCIPLES

### **Innovation**

- Apellis views suppliers as business partners with expertise, assets and capabilities that can be used to enable improvements in efficiency, effectiveness and business continuity to bring life- changing therapies to underserved patients. Suppliers are encouraged to collaborate on green technologies, digital solutions, and supply chain resilience initiatives.

### **Sustainability**

- Suppliers shall strive to improve their organization processes by establishing and implementing sustainability goals in support of minimizing environment impact, managing social risk ethically and responsibly.

## 11 ADDITIONAL POINTS OF MENTION

- Apellis may request additional information through but not limited to supplier surveys/campaigns.
- Apellis may request additional documentation on any of the topics covered in this document.



## 12 CONCLUSION

The Supplier Code of Conduct contains general guidelines for conducting the business of the Company consistent with the highest standards. If you have any questions about these guidelines, please contact your Procurement representative. Apellis expects all of its employees to adhere to these standards.

## REVISION HISTORY

This document will be reviewed every year by the Procurement leadership, Quality, Data Protection, Compliance, Legal and Finance team members.