

ALEXION PHARMACEUTICALS, INC.
COMPREHENSIVE COMPLIANCE PROGRAM
STATE OF CALIFORNIA

California Compliance Program Law

For purposes of compliance with the requirements of California Health and Safety Code, §§ 119400-119402 (effective July 1, 2005) (hereinafter “California Compliance Program Law”), Alexion, has established, as part of its comprehensive compliance program, an annual dollar limit concerning appropriate items covered by the California law (“Covered Items”) that are provided to individual California medical and healthcare professionals as part of Alexion’s interactions with these professionals to enhance the practice of medicine and benefit patient care. Some examples of these Covered Items include educational items, such as medical textbooks, or modest meals provided in connection with Alexion’s efforts to advance the professionals’ understanding of the efficacy, safety, and benefits of Alexion’s products. Alexion’s annual dollar limit on meals and items is \$1,800 per individual healthcare professional. This limit is a maximum amount, it is not an average. Because this limit is a part of Alexion’s compliance program, and because Alexion’s compliance program, by its very nature, must remain dynamic in order to be effective, this annual limit may be revised based on a variety of factors.

Consistent with Alexion’s good faith understanding of the California Compliance Program law, Alexion excludes certain items and payments from its coverage. Alexion’s annual dollar limit does not include the value of:

- Drug samples provided to individual healthcare professionals intended for free distribution to patients.
- Financial support of independent education, including continuing medical educational forums.
- Financial support for health education scholarships.
- Payments for legitimate professional services, including professional speaking, advising, consulting, training, or market research services, that are based on the fair market value of the services provided.
- Educational items provided to physicians to give to their patients to enhance patients' understanding or management of a disease state or disorder (items such as patient educational brochures, instruction sheets, and patient self-assessment tools to track medical information).

For the purposes of the State of California’s Comprehensive Compliance Plan Law, Alexion has designated a Compliance Officer. Alexion has in place a Comprehensive Compliance Program that is consistent with California’s Compliance Plan Law. The Program is also consistent with the April 2003 publication developed by the United States Department of Health and Human Services Office of

Inspector General (“OIG”) entitled “Compliance Program Guidance for Pharmaceutical Manufacturers” and the July 2002 document “Code on Interactions with Health Care Professionals” (“PhRMA Code”) developed by the Pharmaceutical Research and Manufacturers of America (“PhRMA”) with revisions effective January 1, 2022.

Annual Declaration for Purposes of California Health & Safety Code, §§ 119400-119402

Alexion declares, to the best of its knowledge and based upon a good faith understanding of the applicable statutory requirements, that it has established a Comprehensive Compliance Program that encompasses the compliance program requirements stated in California Health & Safety Code, §§ 119400-119402. As of May 1, 2024, Alexion declares that it is, in all material respects, in compliance with the Comprehensive Compliance Program as described above and California Health & Safety Code, §§ 119400-119402 for reporting year January 1, 2023, through December 31, 2023, with no violations exceeding the \$1800 limit. Because compliance is a dynamic concept, Alexion will continue to assess the overall effectiveness of the elements of its Comprehensive Compliance Program, and, as part of its assessment, Alexion may modify aspects of its program to enhance the program’s effectiveness. By declaring that it is in compliance with its Comprehensive Compliance Program, Alexion is asserting that its program is reasonably designed to prevent or detect and address misconduct. **This document and declaration are available on Alexion’s website at <https://alexion.com/our-company/ethical-standards> and also through the Company’s Global Headquarters in Boston, MA, at 475-230-2596.**