

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY



1. Purpose

This global Policy describes Renejix Pharma Solutions (“Renejix”) requirements for the conduct of Renejix personnel in their business dealings for or on behalf of Renejix to ensure Renejix conducts business in compliance with applicable laws, rules and regulations prohibiting bribery and other forms of corruption, including the Foreign Corrupt Practices Act and the United Kingdom Bribery Act.

This Policy is based on the guiding principles established in Kiniksa’s Code of Business Conduct and Ethics, which outlines our commitment, as a Company and individuals, to adhere to the highest standards of integrity and stewardship in service to patients, colleagues, the medical community, and shareholders.

Local applicable laws, and internal Renejix standards facilitating compliance with such laws, may be stricter and should also be respected. Refer to local Policies and SOPs and consult country-specific guidance.

2. Scope

This Policy applies to all employees, consultants, and agents that are acting directly or indirectly on behalf of Renejix. Individuals overseeing such consultants and agents acting directly or indirectly on behalf of Renejix must ensure they comply with this document.

3. Definitions

Bribery – offering, giving, promising, or receiving (or authorizing someone to offer, give, promise, or receive) an improper benefit, directly or indirectly, with the intention of influencing or rewarding behavior to obtain or retain an improper business, financial, or commercial advantage.

Corruption – the abuse of an entrusted power for private gain.

Facilitation Payments – typically small payments to a low-level government official that are intended to encourage such official to perform his or her responsibilities.

Fair Market Value – the price, expressed in terms of cash equivalents, at which property would change hands between a hypothetical willing and able buyer and a hypothetical willing and able seller, acting at arm’s length in an open and unrestricted market, where neither is under compulsion to buy or sell and when both have reasonable knowledge of the relevant facts

Foreign Government Intermediary (“FGI”) – a third party that interacts, or is likely to interact, with ex-US Government Officials on Kiniksa’s behalf. FGIs, which may be headquartered in the US or elsewhere, may include, but are not limited to, the following: distributors, specialty pharmacies, customs agents, sales agents, contract sales organizations, suppliers, manufacturers, contract research organizations, joint venturers, co-promotion partners, market research agencies, and other consultants, contractors, and vendors.

Government Official - officers, employees or official representatives (e.g., consultants) of any national, regional, local, or other government or quasi-governmental agency (e.g., the World Health Organization) including:

- officers and employees of companies in which a government owns an interest,
- candidates for political office at any level, and
- political parties and their officials.

Common examples of Government Officials include individuals employed by regulatory agencies, HCPs employed by public hospitals, or HCPs who act as unpaid advisors to government entities (e.g., by recommending approval or reimbursement of certain drug products, or making procurement or market authorization decisions).

Healthcare Professional (“HCP”) – a licensed provider of medical or health services, or any other person that provides, reimburses, bills, or is paid for healthcare in the normal course of business, including doctors, registered nurses of all types, registered pharmacists of all types, physician assistants, medical directors, pharmacy directors, veterinarians, and formulary committee members. This term does not include healthcare professionals engaged as full-time employees of Renejix.

4. Prohibition of Bribery, Kickbacks or other Improper Payments

4.1. Renejix strictly prohibits all forms of bribery or corrupt conduct, regardless of local customs or tradition. Renejix personnel must not bribe any person or organization, including Healthcare Professionals, government agencies, Government Officials, private companies, and employees of those private companies, under any circumstances. Using third parties, such as consultants, advisers, or other Foreign Government Intermediary or agent acting on behalf of Renejix to commit acts of bribery is a violation of this policy. Interactions, including but not limited to the following, with any person or organization must be carefully scrutinized to ensure they do not cause, or appear to cause, an improper advantage:

- Payment of compensation/honorarium;
- Reimbursement of expenses;
- Provision of hospitality, lodging, and other transfers of value;
- Grants, donations and sponsorships; and
- Investigator Initiated Studies.

4.2. Renejix is committed to conducting business in a manner that promotes integrity and the highest standards of ethical conduct. In order to prevent improper payments, all activities, interactions and payments must:

- Have a legitimate purpose and not be intended to gain an improper advantage;
- Be provided at Fair Market Value and never paid in cash; and
- Comply with all applicable laws, rules regulations, and Renejix policies and procedures.

universities. Therefore, HCPs who are employed by, teach at, or have privileges at such entities are Government Officials. Renejix must be particularly sensitive to bribery and corruption issues when Government Officials are involved.

4.3. In many parts of the world, the government owns or controls pharmacies, hospitals, and public

4.4. Facilitation Payments, even if permitted by local customs or tradition, are prohibited.

4.5. Renejix personnel must not give, offer, or promise anything of value (e.g., payments, gifts, meals, entertainment, recreation, etc.) in order to obtain or retain business, secure an improper advantage, or to influence the judgment or conduct of a person or entity.

5. Due Diligence

5.1. Renejix may be liable (both civilly and criminally) under some circumstances for bribery committed by vendors and other third parties on Kiniksa's behalf; therefore, all potential and current vendors and third parties must be carefully scrutinized. Before engaging a new third party, Renejix must exercise proper due diligence, which may include due diligence questionnaires, completion of training and other due diligence and review deemed necessary by Renejix to ensure the third party is reputable, qualified and can be reasonably expected to refrain from corrupt misconduct. After engaging a third party, on an ongoing basis, Renejix will monitor third parties for any changes that may require action. Furthermore, contracts must be prepared and approved by the Legal Department, and to the extent necessary, include comprehensive Anti-Bribery provisions.

6. Books and Records

6.1. In accordance with relevant rules, regulations, and internal procedures, Renejix requires that all books, records, and accounts are kept in reasonable detail to accurately and fairly reflect all transactions and payments and maintain internal controls to prevent and detect potential violations of Kiniksa's policies or of applicable laws. Renejix personnel are required to obtain authorization for all purchases, commitments and agreements by submission of requests in accordance with relevant policies. Requests and/or documentation must completely and accurately identify and/or record (as applicable) transactions and payments so that the legitimate purpose and amount are clear. Making false, misleading or artificial entries or failure to make complete and accurate entries is prohibited.

7. Review Cycle

This Policy will be reviewed every 3 years.

8. Training

Training will be conducted on this Policy as directed by the Compliance Department.

9. Violations

Failure to comply with this Policy, may result in disciplinary procedures (up to and including termination) in accordance with Renejix Policies. Violations of this Policy should be reported to the Compliance department, the Legal department or management in accordance with Kiniksa's Policy on Compliance Violation Reporting and Non-Retaliation.

10. Questions

Comments or questions about this Policy should be directed to the Compliance Department.

12. Version History

Version	Description of Revision
1.0	New Policy