

Approved and Adopted May 15, 2019

ALEXION PHARMACEUTICALS, INC.

Policy on Political Contributions and Lobbying Activity

Integrity and transparency are central to Alexion's values and culture as we work together to serve patients and families affected by rare diseases through the discovery, development and commercialization of life-changing therapies.

Alexion recognizes the importance of sound public policy in supporting our mission of serving patients by helping to ensure that patients with rare diseases have access to needed therapies. To serve our patients, we consider it important that we participate constructively in the United States political process to help inform debate around healthcare policy including ideas such as innovation, patient access to new and existing treatments and sound science. Alexion Government Affairs engages in public policy debate primarily by communicating information and engaging with elected officials and other policy makers in Washington, D.C. and throughout the country.

Oversight

The Nominating and Corporate Governance Committee (the "Committee") of the Alexion Board of Directors has oversight of all Alexion's political activities. The Committee shall annually review this policy and oversee our contribution practices.

United States Federal and State Political Activities and Lobbying Activities

Policy regarding federal and state political contributions

Alexion may, either directly or through the Alexion Pharmaceuticals Inc. PAC, make political contributions to federal, state, and local candidates in the United States. Generally, contributions are made to office holders and candidates whose views on industry specific issues are consistent with or open to our long-term legislative and regulatory goals or to those who represent the communities served by our company, including where our employees and facilities are located. All such contributions shall be in accordance with all applicable laws. Contributions are made with Alexion's best interests in mind and without regard for the personal political preferences of Alexion's Board Members, executives or lobbyists and without discrimination based on political party affiliation.

Alexion corporate funds may be used, when in compliance with applicable law, in some states to contribute to non-federal candidates, political parties, and political committees. Where permitted, Alexion may make contributions to state or local candidates, or political committees, through the Alexion Pharmaceuticals Inc. PAC.

Using the same process described above, Alexion also may use corporate funds to make contributions to ballot measure committees as well as to make independent expenditures in support of or opposition to federal, state, or local candidates or state or local ballot measures.

Political Action Committee

Elected officials throughout the country make decisions on public policy issues impacting our industry and the patients we serve. Accordingly, Alexion Pharmaceuticals, Inc. has established the Alexion Pharmaceuticals Inc. PAC (identification number: C004711689), a federally registered political action committee, to provide our eligible employees and members of our Board of Directors a direct means to voluntarily pool their resources to support candidates for federal office who share the values and ideals of our company, employees, and community.

The Alexion Pharmaceuticals Inc. PAC is funded solely by voluntary donations from eligible employees.

The Alexion Pharmaceuticals Inc. PAC is, pursuant to its by-laws, governed by a Board of Directors to exercise, supervise and direct the political contributions made by the Alexion Pharmaceuticals Inc. PAC. The Alexion Pharmaceuticals Inc. PAC activity, as with all political activity, is ultimately overseen by the Nominating and Corporate Governance Committee. The Alexion Pharmaceuticals Inc. PAC operates in accordance with applicable federal and state laws and makes political contributions with Alexion's best interests in mind and without regard for the personal political preferences of Alexion's Board Members, executives or lobbyists and without discrimination based on political party affiliation.

All contributions made and received by the Alexion Pharmaceuticals Inc. PAC are publicly disclosed in reports filed with the U.S. Federal Election Commission, which may be viewed on the U.S. Federal Election Commission's website at www.fec.gov.

Lobbying Disclosure

All relevant Alexion staff and outside firms are required to comply with the Lobbying Disclosure Act (LDA) and Honest Leadership and Open Government Act in addition to the Congressional gift rules and the gift rules applicable to the Executive Branch of the federal government. Under the LDA, Alexion is required to register and report federal lobbying activities to the Clerk of the U.S. House of Representatives and the Secretary of the U.S. Senate. These reported expenditures include the portion of national trade association dues used for lobbying. The reports containing these expenditures can be viewed at <https://lobbyingdisclosure.house.gov/>. Additional lobby disclosure rules often apply at the state and sometimes local levels, and Alexion complies with all such applicable state and local disclosure laws and ethics rules.

Trade Associations, Industry Groups and Other Organizations

In an effort to bring about consensus on broad policy issues that can impact our business objectives, Alexion is a member of industry and trade groups which represent the pharmaceutical

industry and the business community at large. We may, in the future, become a member of additional similar organizations. Our participation as a member of an industry group comes with the understanding that we may not always agree with the positions of the larger organizations or other members, and we are committed to voicing our concerns as appropriate through our colleagues who serve on the boards and committees of these groups. Click **[insert link]** for a listing of the trade organizations to which we pay more than \$25,000 per year in membership dues or other payments and the portion of such payment that is considered nondeductible as lobbying and political activity.

Alexion may use its corporate funds to contribute to nonprofit organizations established under Section 501(c)(3) of the Internal Revenue Code.

Should we make contributions to Section 501(c)(4) “social welfare” organizations or Section 527 organizations, such contributions will be disclosed on a semi-annual basis on our website (as described below).

Political Contributions Outside the United States

Alexion and its affiliates may make political contributions in any nation other than the United States in compliance with applicable law (including applicable local law) and Alexion policies.

Transparency Around Political Contributions

To improve access to information about Alexion's corporate political contributions in the United States, Alexion posts on its website, on a semi-annual basis:

- Corporate contributions to candidates in state and local elections as well as corporate contributions to other political committees, PACs, and political party committees;
- Contributions made by the Alexion Pharmaceuticals Inc. PAC;
- Contributions to 527 political organizations;
- Donations to 501(c)(4) social welfare organizations;
- Independent expenditures for or against a political candidate or ballot measure ; and
- The portion of contributions, dues or payments to trade associations that have been identified as non-deductible expenditures under Section 162(e)(1) of the Internal Revenue Code (where total dues to the trade association are in excess of \$25,000 per year).