

POLICY

TITLE: Akebia Global Comprehensive Compliance Program Policy	NUMBER: CORP-POL-0027
	VERSION: 2.4

1.0 PURPOSE

At Akebia, 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, Akebia has designed its Compliance Program to fit the size, resources and other unique aspects of our organization. Akebia 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”), Akebia supports and has implemented policies and procedures that are consistent with the requirements of the PhRMA Code on Interactions with Healthcare Professionals dated July 1, 2002, and revised on January 1, 2022 (the “PhRMA Code”).

2.0 SCOPE

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

3.0 TERMS and DEFINITIONS

Term	Definition
N/A	N/A

4.0 ROLES and RESPONSIBILITIES

Role	Responsibilities
N/A	N/A

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5.0 COMPREHENSIVE COMPLIANCE PROGRAM

5.1. Written Standards

- 5.1.1. Akebia’s Code of Business Conduct and Ethics establishes key ethical principles that all Akebia Personnel and Embedded Contractors, officers and directors of the Company must follow, as well as standards to help ensure compliance with applicable laws and company policies.
- 5.1.2. In addition to the Code of Business Conduct and Ethics, Akebia has developed and implemented policies, procedures, guidelines and other business rules to address potential risk areas for pharmaceutical manufacturers.

5.2. Governance and Oversight

- 5.2.1. Akebia’s Board of Directors has designated its Audit Committee to establish expectations, oversee, and evaluate the effectiveness of the Compliance Program.
- 5.2.2. Akebia has designated a Vice President, Legal & 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 Audit 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.
- 5.2.3. Akebia has also established a 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 Akebia’s Compliance Program.

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5.3. Education and Training

5.3.1. Akebia is committed to developing and delivering effective compliance training. All new Akebia Personnel and Embedded Contractors are trained on compliance issues, including Akebia’s Code of Business Conduct and Ethics and compliance-related policies, procedures, guidelines, and business rules applicable to their job functions. Akebia periodically reviews and updates its training programs to reflect changes in standards or laws and identified risks for the Company.

5.4. Employee Communications and Reporting

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

5.4.2. Akebia has adopted policies that require Akebia Personnel and Embedded 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 team member, or a manager. Any person who receives a compliance report must report the concern to the Chief Compliance Officer. 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 Akebia’s Compliance Hotline, Akebia Listens. Access is available 24 hours a day, 7 days a week at (844) 756-5522 or <https://akebia.ethicspoint.com>.

5.5. Auditing and Monitoring

5.5.1. To measure the efficacy of Akebia’s training and education program, as well as to confirm that Akebia Personnel and Embedded Contractors are acting in the expected compliant manner, Akebia 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 Akebia’s business practices.

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5.6. Enforcement and Discipline

5.6.1. Akebia 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.

5.7. Corrective and Preventive Action Plans

5.7.1. Akebia maintains detailed policies and procedures that guide the Company to respond promptly to potential violations of law or Akebia 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.

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

5.8.1. **This annual declaration is effective June 30, 2025**

5.8.2. Akebia 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”), Akebia (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.

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

5.9. California Annual Spending Limit

5.9.1. As part of Akebia’s interactions with Healthcare Professionals (“HCP’s”), Akebia may provide Meals, promotional Materials, Educational Items or

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other items. Akebia 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 from time to time as deemed appropriate by Akebia.

- 5.9.2. The annual spending limit set forth in this declaration does not include the value of:
 - 5.9.2.1. Drug samples given to physicians and healthcare professionals intended for free distribution to patients;
 - 5.9.2.2. Financial support of independent education including continuing medical education forums;
 - 5.9.2.3. Financial support for health education scholarships complying with the OIG Guidance and the PhRMA Code, and;
 - 5.9.2.4. 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;

6.0 REGULATIONS AND STANDARDS

Authority	Regulation/Standard
N/A	N/A

7.0 APPENDIX

Appendix	Description
N/A	N/A

8.0 REVISION HISTORY

Version	Summary of Changes
2.0	Added step 5.8.1 "This annual declaration is effective October 1, 2024."
2.1	Revised annual declaration date to June 30, 2025

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