

Alnylam’s Commitment to Ethics and Compliance

Alnylam Pharmaceuticals (“Alnylam”) is committed to its strong scientific heritage, driven by curiosity, innovation, and an unwavering focus on developing products to help patients. We strive for the highest ethical and compliance standards and are committed to establishing and maintaining an effective Compliance Program. Our Compliance Program is tailored to meet the Company’s needs and aligns with our values. We regularly review and enhance our Compliance Program to ensure it remains consistent with our evolving business needs, and with associated legal and regulatory risks and industry developments.

Our Compliance Program incorporates the elements of an effective compliance program in accordance with the “Compliance Program Guidance for Pharmaceutical Manufacturers” (“OIG Guidance”), which was developed by the United States Department of Health and Human Services, Office of Inspector General (“OIG”). The fundamental elements of our Compliance Program are described below.

Elements of Our Comprehensive Compliance Program

Governance and Oversight

Our Chief Ethics & Compliance Officer, a member of the management board and reporting to the Executive Chair, leads our global compliance function. Our Compliance Committee, co-chaired by the Executive Chair and Chief Ethics & Compliance Officer and comprised of the Chief Executive Officer and other senior leaders from across the Company, oversees our Compliance Program and provides multi-functional leadership of the Company’s compliance and risk mitigation strategy.

In addition, the Nominating and Corporate Governance Committee of the Board of Directors has oversight responsibility for all non-financial compliance matters. The Chief Ethics & Compliance Officer meets periodically with the Nominating and Corporate Governance Committee, providing updates and discussing the Company’s evolving risk profile, compliance strategy, and Compliance Program.

Written Standards

Our Code of Business Conduct and Ethics (“Code”), available on our website, is the foundation of our Compliance Program, setting out the ethical standards and legal principles that govern our business activities.

Building on our Code, Alnylam maintains written policies, procedures, and guidance (“Written Standards”) governing a wide variety of matters applicable to our business, including our interactions with healthcare professionals. These Written Standards are designed to ensure that our interactions with healthcare professionals are ethical and compliant with applicable laws, regulator guidance, and industry codes, including:

- **OIG Guidance; and**
- **The Pharmaceutical Research and Manufacturers of America (PhRMA) “Code on Interactions with Healthcare Professionals” (“PhRMA Code”).**

These Written Standards address key activities such as promotional activities, consulting and advisory arrangements with healthcare professionals, grants and charitable donations, clinical trials, and meals and travel that may be provided to healthcare professionals. We review all our Written Standards, including those governing our interactions with healthcare professionals, regularly and revise them as appropriate to address emerging risks and business changes.

As required by California Health & Safety Code §§ 119400-119402, Alnylam has established an annual limit of \$2,000 for certain promotional activities and educational items provided to individual medical and healthcare professionals licensed in California. This annual dollar limit does not include prescription product samples intended for free distribution to patients, medical education or sponsorship grants, research grants, or fair market value payments for legitimate professional services. This dollar limit represents a spending maximum and not an average or goal. Alnylam reserves the right to change this limit at any time.

Training and Education

Training is a critical component of our compliance program. Our training program is designed to educate our employees on our values, our Written Standards, and their legal and ethical obligations. Training is provided at the time of hire and periodically thereafter as appropriate.

Lines of Communication

Open culture is one of Alnylam's core values. We encourage everyone to ask questions and raise issues or concerns promptly to a manager, human resources, legal, compliance, or via our Compliance helpline. For individuals (inside or outside the company) who prefer anonymity, Alnylam's 24-hour, confidential Compliance helpline is managed by a third party and can be accessed by telephone at 1-844-543-8355 or via the web at alnylam.ethicspoint.com. Our goal is to create an environment where questions and concerns are raised without fear of retaliation. To that end, we have adopted Written Standards addressing open culture, raising questions or concerns, confidentiality, and non-retaliation.

Risk Assessment, Monitoring, and Auditing

Alnylam embraces continuous improvement in all aspects of its business, including its Compliance Program. To assess the effectiveness of our Program and detect or prevent potential compliance violations, we undertake regular risk assessment and risk-based compliance monitoring and auditing. In accordance with OIG Guidance, our risk assessment, monitoring, and auditing activities—including the type, scope, location, and frequency of our efforts—vary based on a number of factors including regulatory requirements, evolving business strategies, and other considerations.

Enforcement of Standards

Our Written Standards include explicit notification that disciplinary measures, up to and including termination, may be taken for violations of applicable law, regulation, or Company policy.

Responding to Potential Non-Compliance

Under our Written Standards, potential, suspected, or actual violation of applicable law or regulation, or the Company's Code or Written Standards is addressed thoughtfully and promptly, with corrective action, where appropriate, tailored to remediating past acts and enhancing our Compliance Program.

A written copy of Alnylam's Comprehensive Compliance Program may be obtained by contacting us via email at compliance@alnylam.com, by telephone at 1-844-543-8355 or via the web at alnylam.ethicspoint.com.