

CODE OF BUSINESS CONDUCT AND ETHICS

MESSAGE FROM THE CEO

At Alumis, we are dedicated to bringing important novel therapies forward that improve patients' lives, the hallmark of success for our business in the biopharmaceutical industry. With that focus on people and patients, how we achieve our success is as important as what we achieve!

We are committed to maintaining the highest standards of business and professional conduct and integrity. Our colleagues, external partners, regulators and customers, and the patients we hope to serve expect us to operate with these high standards. This Code of Business Conduct and Ethics (this "*Code*") outlines our values and expectations and should be used as a tool by everyone in the company, regardless of role, to help us guide the decisions we make every day.

We pledge to foster an open-door environment, and we need you to speak up if you ever have questions about the right thing to do or feel that this Code is being violated. Talk with your manager or with anyone in my leadership team. You may also share concerns anonymously through our hotline, the COMpliance and ETHics program hotline (the COMET-line).

At a minimum, we will:

- Maintain and adhere to the highest ethical standards
- Comply with all federal, state and local laws and regulations, as well as all company policies and procedures, including this Code
- Foster a diverse and inclusive work environment that ensures everyone is treated with respect and dignity
- Avoid any and all conflicts of interest, and the appearance of such
- Keep property, resources and information secure, including nonpublic customer, patient, shareholder, company and employee information
- Promptly report any ethical concerns to the appropriate persons, as specified in this Code
- When in doubt, ask!

Thank you for your commitment to Alumis and to our mission, and especially for conducting yourself with the highest standards of ethics and integrity.

Martin Babler
President and CEO

COMET-line: 833-545-3051 and <https://www.whistleblowerservices.com/ALMS>

COMPLIANCE WITH LAWS AND HIGH ETHICAL BUSINESS STANDARDS

Alumis Inc. (or the “*Company*”) expects all of its directors, officers and employees, wherever located and regardless of function, to conduct all activities in accordance with our high standards of honesty and ethics and in compliance with the laws, regulations and written directives everywhere we do business. This expectation also extends to third-party contractors who conduct certain activities on our behalf. When used in this Code, “employees” includes all individuals covered by this Code as described above.

Employees are expected to be familiar with the basic legal requirements that apply to their respective functions or services. This Code is supported by Alumis policies, and SOPs and guidance documents, which have been designed to provide specific guidance and requirements in particular areas. Every employee must be familiar with and follow these requirements. Compliance is everyone’s responsibility.

COMET: OUR COMPLIANCE AND ETHICS PROGRAM

Alumis has an established compliance program designed and implemented to ensure adherence to all relevant laws and regulations as well as ethics provisions of this Code. Our COMpliance and ETHics program is named COMET and is overseen by the Executive Committee, the Chief Compliance Officer, and the Nominating & Corporate Governance Committee of our Board of Directors (the “*Board*”). For purposes of this Code, the Chief Compliance Officer (the “*Chief Compliance Officer*”) shall initially be the Company’s General Counsel (the “*Legal Officer*”). In the temporary absence of a Legal Officer for up to one month, the Company’s Chief Business and Legal Officer or Chief Financial Officer shall serve as the Chief Compliance Officer. When and if the Legal Officer is absent for more than one month, the Board shall designate a new Chief Compliance Officer. These individuals and groups are responsible for developing and enforcing COMET and our Code of Business Conduct and Ethics, including:

- Ensuring an effective Compliance Program
- Directing management focus to areas of our business that by their nature may present compliance risks
- Ensuring that all Alumis employees are appropriately trained on this Code and the policies of the Company that support it
- Assessing whether the goals and principles of our Code of Business Conduct and Ethics are being upheld
- Fostering an “open-door” environment where questions or concerns related to conduct and ethics can be appropriately addressed
- Ensuring that Alumis’ undertakings to governments and regulators are followed
- Directing investigations of any alleged violation of this Code
- Ensuring that appropriate actions are taken if there is a substantiated violation
- Defining and driving whatever compliance initiatives may be necessary
- Championing a culture of compliance throughout the Alumis organization

Functional and department leaders are responsible for fostering a culture of compliance, leading by example, and ensuring the spirit and letter of this Code are followed.

UNDERSTANDING AND COMPLYING WITH LAWS AND REGULATORY REQUIREMENTS

We expect employees to understand the requirements applicable to their functions and areas of responsibility. While we do not expect all of our employees to know the details of the underlying laws and regulations, we do expect you to understand, know and comply with the relevant policies, SOPs and guidance documents that are based on those laws and regulations. We provide initial and periodic training

in a variety of ways, including live and online training. We also expect our employees to use the resources we make available to them and to ask when in doubt.

Disregard of the law will not be tolerated. Violation of domestic or foreign laws, rules and regulations may subject an individual, as well as the Company, to civil and/or criminal penalties. You should be aware that conduct and records, including emails, are subject to internal and external audits and to discovery by third parties in the event of a government investigation or civil litigation. It is in everyone's best interest to know and comply with our legal, regulatory, and other obligations.

HONESTY WITH REGULATORS AND OTHER GOVERNMENT OFFICIALS

Alumis is subject to many domestic and international laws, regulations and guidelines. Particular care must be taken to ensure that no inaccurate, incomplete or misleading reports, certifications, claims or statements are made to any government agency or official. When dealing with government officials and employees, Alumis employees should avoid even the appearance of impropriety. Any activity, anywhere in the world, that could be perceived as an attempt to improperly influence or mislead government officials to obtain favorable treatment or for any other purpose is strictly prohibited. Local custom or common practices are not a basis for permissible activity.

We have adopted a standalone Anti-Corruption Policy, which provides guidance regarding compliance with the U.S. Foreign Corrupt Practices Act (the "*FCPA*") and other anti-corruption laws, as well as rules regarding interactions with, government officials. If you have a question as to whether an activity is restricted or prohibited, please ask before taking any action that might be regulated by international laws.

MAINTENANCE OF CORPORATE BOOKS, RECORDS, DOCUMENTS AND ACCOUNTS

All Alumis records must be prepared accurately, truthfully and in a timely manner. The making of false or misleading entries in any Alumis record is strictly prohibited.

Financial activities are to be recorded in compliance with all applicable laws and accounting practices. All employees must cooperate fully with the Finance Department, as well as our independent public accountants, and provide complete and accurate information to them to help ensure that all of Alumis' financial books, records and reports are accurate.

Similarly, our research and development records form the basis of government and non-government decisions regarding the development and approval of our products. Accordingly, they must be complete, accurate and recorded and controlled in accordance with all applicable laws and regulations.

Lawsuits, legal proceedings and investigations concerning the Company must be handled promptly and properly. An employee must approach the Company's General Counsel and/or the Chief Business and Legal Officer immediately if he or she receives a court order or a court issued document, or notice of a threatened lawsuit, legal proceeding, or investigation. A legal hold suspends all document destruction procedures in order to preserve appropriate records under special circumstances, such as litigation or government investigations. When there is a "legal hold" in place, employees may not alter, destroy or discard documents relevant to the lawsuit, legal proceeding or investigation. The Company's General Counsel and/or the Chief Business and Legal Officer determines and identifies what types of records or documents are required to be placed under a legal hold and will notify employees if a legal hold is placed on records for which they are responsible. If an employee is involved on the Company's behalf in a lawsuit or other legal dispute, he or she must avoid discussing it with anyone inside or outside of the Company without prior approval of the Company's General Counsel and/or the Chief Business and Legal Officer.

Employees and their managers are required to cooperate fully with Legal in the course of any lawsuit, legal proceeding or investigation.

PUBLIC DISCLOSURE AND COMMUNICATIONS

Securities laws require that we provide full, fair, accurate, timely and understandable disclosure in reports and documents we file with the U.S. Securities and Exchange Commission (the “*SEC*”) and in other public communications. Only authorized officers of the Company may make public disclosures.

In support of this commitment, each officer and employee must (a) follow Alumis’ various policies dealing with external communications, (b) maintain complete and accurate records, and (c) not knowingly misrepresent, or cause others to misrepresent, facts about Alumis to anyone. Any employee who becomes aware of a departure from these standards has a responsibility to report his or her knowledge promptly to a supervisor, the Chief Compliance Officer or the Nominating and Corporate Governance Committee or in accordance with the provisions of our standalone Whistleblower Policy on reporting complaints regarding accounting and auditing matters.

SCIENCE, CLINICAL PROGRAM AND APPROVED PRODUCT COMMUNICATIONS

It is Company policy to communicate about our science, clinical programs and products, if and when approved, in a factual and informative manner. All such communications must be consistent with applicable regulations. Medical information and promotional materials disseminated by Alumis or by others on Alumis’ behalf must accurately and fairly describe the Company’s science, clinical programs and/or products, if and when approved, and not be false, misleading or deceptive. It is also Company policy to use only medical, sales and marketing programs and materials that have been approved in accordance with Company procedures.

CONFIDENTIAL, PRIVATE AND PROPRIETARY INFORMATION

The protection of confidential business information and trade secrets is vital to the interests and success of Alumis. Such information should not be shared, unless it is necessary to do so in the performance of a job or activity, and such sharing is covered by a confidentiality agreement.

As an employee of Alumis, you may learn of information about Alumis, or about third parties that have shared information with Alumis under confidentiality agreements, that is confidential and proprietary. You also may learn of information before that information is released to the general public. Employees who have received or have access to confidential information should take care to keep this information confidential. Confidential information includes nonpublic information that might be of use to competitors or harmful to Alumis or its customers if disclosed, such as business plans, scientific and technical strategies, financial information, information related to Alumis’ research platform, data and results, inventions, works of authorship, trade secrets, processes, conceptions, formulas, patents, patent applications, licenses, suppliers, manufacturers, customers, market data, personnel data, personally identifiable information pertaining to our employees, trial participants, customers or other individuals (including, for example, names, addresses, telephone numbers and social security numbers), and similar types of information provided to us by our customers, suppliers and partners. This information may be protected by patent, trademark, copyright and trade secret laws.

You should also take care not to inadvertently disclose confidential information. Materials that contain confidential information, such as memos, notebooks, electronic data capturing systems, electronic storage devices, and laptop computers, should be stored securely with controlled access. Unauthorized posting or discussion of any information concerning our business, information or prospects on the Internet

is prohibited. You may not discuss our business, information, or prospects in any “chat room,” regardless of whether you use your own name or a pseudonym. Be cautious when discussing sensitive information in public places like elevators, airports, restaurants and “quasi-public” areas in and around our place of business. All Company emails, voicemails and other written communications are presumed confidential and should not be forwarded or otherwise disseminated outside of the Company except where required for legitimate business purposes.

Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance our interests.

All employees are required to sign a Confidential Information and Inventions Assignment Agreement promising they will not divulge Alumis’ proprietary information or material outside of Alumis and that the ideas, inventions, products and processes developed while working for Alumis are the property of Alumis.

PROTECTION OF PERSONAL INFORMATION

Alumis is committed to the lawful stewardship of personal information that is collected, stored and used by the Company. We respect personal privacy. In addition to confidentiality requirements, Alumis employees are also obligated to respect privacy-related state and federal laws and regulations in the U.S. and, as applicable to Alumis, outside the U.S. Alumis is committed to ensuring these protections are extended to any third parties providing services to the Company or conducting business on Alumis’ behalf; the Company may terminate any services that violate our policies.

INSIDER TRADING

Employees who have access to confidential (or “inside”) information are not permitted to use or share that information for stock trading purposes or for any other purpose except to conduct our business. All material, nonpublic information about Alumis or about companies with which we do business is considered confidential information. To use material, nonpublic information in connection with buying or selling securities, including “tipping” others who might make an investment decision on the basis of this information, is both unethical and illegal. Employees must exercise the utmost care when handling material inside information and must keep such information confidential unless and until that information is released to the public through approved channels (usually through a press release, an SEC filing or a formal communication from a member of senior management). Please refer to our standalone Insider Trading Policy for more detailed information.

ANTITRUST, COMPETITIVE PRACTICES AND INTERACTIONS WITH COMPETITORS

Antitrust laws are designed to protect the competitive process. These laws are based on the premise that the public interest is best served by competition and will suffer from illegal agreements or collusion among competitors. Antitrust laws generally prohibit agreements, formal or informal, with competitors that harm competition or customers, including price fixing and allocations of customers, territories or contracts; agreements, formal or informal, that establish or fix the price at which a customer may resell a product; and the acquisition or maintenance of a monopoly or attempted monopoly through anti-competitive conduct. Alumis will, at all times, uphold the principles of free and open competition. We will not enter any agreement that improperly restrains competition. We will not share with any competitor information relating to Alumis’ prices or pricing policies or any other competitive information. We will not conduct competitive intelligence practices that are unlawful or unethical.

Certain kinds of information, such as pricing, production and inventory, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be and regardless of the setting, whether business or social, direct or incidental.

Antitrust laws impose severe penalties for certain types of violations, including criminal penalties and potential fines and damages of millions of dollars, which may be tripled under certain circumstances. Understanding the requirements of antitrust and unfair competition laws of the various jurisdictions where we do business can be difficult, and you are urged to seek assistance from your supervisor or the General Counsel and/or the Chief Business and Legal Officer whenever you have a question relating to these laws.

GIVING AND RECEIVING OF BUSINESS GIFTS AND ENTERTAINMENT

The giving and receiving of business gifts and entertainment is meant to create goodwill and sound working relationships and not to gain improper advantage with customers, facilitate approvals from government officials or allow Alumis employees to take advantage of the Company's business relationships for their own personal gain. Every employee is expected to exercise good judgment.

An employee with questions regarding the appropriateness of giving or receiving a gift or entertainment should seek guidance from their manager, the Legal Department or our Chief Compliance Officer.

These principles apply to our transactions everywhere in the world, even where the practice is widely considered "a way of doing business." Employees should not accept gifts or entertainment that may reasonably be deemed to affect their judgment or actions in the performance of their duties. Our customers, suppliers and the public at large should know that our employees' judgment is not for sale.

Under some statutes, such as the FCPA, giving anything of value to a government official to obtain or retain business or favorable treatment is a criminal act subject to prosecution and conviction. Discuss with your supervisor or our Chief Compliance Officer any proposed entertainment or gifts if you are uncertain about their appropriateness.

In addition, Alumis strictly prohibits providing any gifts or entertainment as inducements to any health care provider and any other person or entity in a position to influence the design or conduct of research studies; to prescribe, purchase, recommend, refer or arrange for the purchase, sale or formulary placement of Alumis products, if and when approved; or to develop clinical practice guidelines relevant to Alumis products, if and when approved.

MEALS AND ENTERTAINMENT

Excluding interactions with health care providers or anyone who can recommend the prescription of one of our products, if and when approved (where the exchange of meals and entertainment is generally prohibited except with prior approval from the General Counsel), the exchange, as a normal business courtesy, of meals or entertainment (such as dinner, tickets to a game or the theatre or a round of golf) is a common and acceptable practice as long as it is not extravagant. Meals and business entertainment cannot be offered, provided, sought or accepted by any employee unless they are within reasonable and customary limits and not (i) susceptible of being construed as a bribe or kickback, (ii) made or received on a regular or frequent basis, or (iii) in violation of any laws. The appropriateness of an invitation for a meal or entertainment that is more than modest should be directed to our Chief Compliance Officer for an evaluation. For clarity, a single meal or a single entertainment that can reasonably be expected to cost more than \$200 per person is considered to be more than modest for purposes of this Code.

GIFTS, SERVICES AND FAVORS

Alumis follows procedures to ensure that employees exercise appropriate judgment and diligence in the choice of business partners. All Alumis purchases and awards of subcontract in every country where Alumis operates must be made strictly on the basis of quality, suitability, service, price and efficiency. Failure to follow these principles may be a violation of laws, including, but not limited to, the FCPA, the federal Anti-Kickback Statute and the Physician Payments Sunshine Act and similar state laws.

Each Alumis employee is expected to deal fairly with our customers, suppliers, employees and anyone else with whom we have contact in the course of business. Be aware that the Federal Trade Commission Act provides that “unfair methods of competition in commerce, and unfair or deceptive acts or practices in commerce, are declared unlawful.” It is a violation of the Federal Trade Commission Act to engage in deceptive, unfair or unethical practices and to make misrepresentations in connection with sales activities.

Employees may not offer, provide, seek or accept, directly or indirectly, any service, favor or gift from any outside person or entity that does business with, seeks to do business with, or is a competitor of, the Company, unless (a) it is not susceptible of being construed as a bribe or kickback, (b) it is not in violation of any laws, (c) acceptance could not reasonably influence or reasonably appear to influence the employee’s business judgment and (d) the service, favor or gift has a value of less than \$200 (and never cash). Exceptions must be approved by both the employee’s manager and our Chief Compliance Officer. Gifts from vendors should be shared with other Alumis employees to the extent possible.

CONFLICTS OF INTEREST

AVOIDING CONFLICTS OF INTEREST

Employees must avoid any relationship or activity that might affect, or even appear to affect, their ability to make objective and fair decisions when performing their duties for Alumis and must at all times be free from any influence that might conflict with the interests of Alumis.

A conflict of interest may arise when:

- You allow a personal or outside interest to interfere with or influence the performance of your duties;
- You make a decision or engage in conduct that is not in the best interest of Alumis;
- Your responsibilities at Alumis involve you in a matter that creates or may create a personal or financial interest or opportunity for you, or your family or friends;
- You are asked to be on the Board of, or to perform services for or assist, any entity that is a competitor or vendor of Alumis.

DETERMINATIONS REGARDING POTENTIAL CONFLICTS

Determining whether a conflict of interest exists is not always easy to do. Before engaging in any activity, transaction or relationship that may give rise to a conflict, or if you are unsure whether a conflict may exist, you must seek review from your manager as well as our Chief Compliance Officer. The Chief Compliance Officer is responsible for determining whether there is in fact a conflict of interest and will recommend appropriate actions. Determinations by the Chief Compliance Officer related to potential conflicts related to Section 16 officers are to be reported to the next meeting of the Nominating & Corporate Governance Committee. Any waiver is to be handled in accordance with the waiver provisions below.

CORPORATE OPPORTUNITIES

You may not take personal advantage of opportunities for the Company that are presented to you or discovered by you as a result of your position with us or through your use of corporate property or information, unless authorized by your supervisor, the Chief Compliance Officer or the Nominating & Corporate Governance Committee. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business. Significant participation in an investment or outside business opportunity that is directly related to our lines of business must be pre-approved. You may not use your position with us or corporate property or information for improper personal gain, nor should you compete with us in any way.

INVESTMENTS

Employees are not prohibited from investing in entities that are potential or current competitors or suppliers to Alumis; however, such investments may constitute only a small fraction of the employee's overall investment portfolio, and may never represent an interest that is greater than 5% of such company. Further, such investments may require the investing employee to recuse himself or herself from any future business dealings between Alumis and the company in which the employee is invested. Trading in such companies based on confidential information obtained in the course of Alumis business activities, such as advisory boards, is prohibited. As noted above, any significant participation in an investment or outside business opportunity must be pre-approved.

BOARD MEMBERSHIPS

Employees are not prohibited from serving as a civic or charitable board member or trustee, provided that the time commitment does not interfere with your job duties. However, if the group focuses on a disease area for which an Alumis product is being developed, you need to obtain prior approval.

Serving on the board of a for-profit entity requires the pre-approval of our CEO and our Chief Compliance Officer, and employees may not serve on the board of a competitor or vendor of Alumis or any entity that has an adverse relationship to Alumis.

Even with such prior approval, if Alumis' CEO and Chief Compliance Officer later determine, in their sole discretion, that an employee's service as a director or trustee adversely affects the performance of his/her duties for Alumis, he/she may be asked to resign from such service.

All Alumis employees, except the CEO, may seek conflict of interest determinations from the Chief Compliance Officer. If the employee is a Section 16 officer of Alumis, approval to sit on the board of a for-profit health care company must be obtained from the Board. If the Chief Compliance Officer reasonably believes that the position presents a potential conflict and requires a waiver from this Code, the Chief Compliance Officer must submit the matter to the Board as provided below in the "*Approvals and Waivers*" section. The CEO must seek conflicts determinations and, if necessary, approvals and waivers directly from the Board.

OUTSIDE CONSULTING AND EMPLOYMENT

Employees who are not Section 16 officers may, with the permission of the officer in charge of your department, provide limited services as a consultant or otherwise to another entity, if such activity does not conflict with the interests of Alumis. Section 16 officers, except the CEO, must discuss all such outside employment and consulting opportunities with the Chief Compliance Officer for determination. The CEO must present all such opportunities directly to the Board for determination and, if necessary,

waiver. Employees may not solicit business on Alumis premises or while working on Alumis time. Employees are not permitted to use Alumis materials or proprietary information for any outside work, and may make only nominal and minimal use of Alumis' facilities and equipment for such purposes. In general, such outside work should not interfere with the employee's regular work duties during Alumis' normal business hours.

If an employee serves as a consultant or as a corporate, civic or charitable director or trustee (with prior approval, when such approval is required), the employee has the duty and obligation to take any and all reasonable steps to avoid creating the appearance of a conflict, as would be judged by a reasonable person who is experienced in our business.

EMPLOYING MULTIPLE FAMILY MEMBERS

It is not against our policies for more than one family member to work for Alumis. However, no family member should be employed in a position that reports to another family member (anywhere in the same management line) or works within another family member's line of authority. Also, an employee should never make or be involved in any promotion decision or any other significant decision or action involving the employment of a member of his or her family.

PROTECTION AND PROPER USE OF COMPANY ASSETS

Alumis' property, such as office supplies, computer equipment and buildings, are expected to be used only for legitimate business purposes, although incidental personal use may be permitted. You may not, however, use our corporate name, any brand name or trademark owned or associated with the Company or any letterhead stationery for any personal purpose.

You may not, while acting on behalf of the Company or while using our computing or communications equipment or facilities, either (i) access the internal computer system (also known as "hacking") or other resource of another entity without express written authorization from the entity responsible for operating that resource; or (ii) commit any unlawful or illegal act, including harassment, libel, fraud, sending of unsolicited bulk email (also known as "spam") or material of objectionable content in violation of applicable law, trafficking in contraband of any kind or any kind of espionage.

If you receive authorization to access another entity's internal computer system or other resource, you must make a permanent record of that authorization so that it may be retrieved for future reference, and you may not exceed the scope of that authorization.

Unsolicited bulk email is regulated by law in a number of jurisdictions. If you intend to send unsolicited bulk email to persons outside of the Company, either while acting on our behalf or using our computing or communications equipment or facilities, you should contact your supervisor or the Chief Compliance Officer for prior approval.

All data residing on or transmitted through our computing and communications facilities, including email and word processing documents, is the property of the Company and subject to inspection, retention and review by the Company, with or without an employee's or third party's knowledge, consent or approval, in accordance with applicable law. Any misuse or suspected misuse of our assets must be immediately reported to your supervisor or the Chief Compliance Officer.

Upon termination of employment with Alumis, each employee shall return to and not take from Alumis any Alumis property, including, but not limited to: (a) any inventory, material, supply, communication, correspondence, document or product; (b) any idea, invention and/or process that was

developed while working for Alumis; (c) any form of reproduction or copy of any of (a) or (b) above, including without limitation any electronic (e.g., email) versions; and/or (d) any proprietary or confidential property or information of Alumis as defined in Alumis' Confidential Information and Inventions Assignment Agreement.

MEDIA AND PUBLICITY

It is our policy to disclose material information concerning the Company to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in the Company will have equal access to information. All inquiries or calls from the press and financial analysts should be referred to the CEO, CFO, CMO, CSO or communications officer. We have designated our CEO, CFO, CMO, CSO or communications officer as our official spokespersons for financial, scientific, clinical, technical and other related information. Unless the CEO and the CFO have specifically designated other Company employees to speak on behalf of the Company, these designees are the only people who may communicate with the press on behalf of the Company. No employee may provide any information to the media about the Company off the record, for background, confidentially or secretly.

POLITICAL CONTRIBUTIONS

In countries where corporations are prohibited from making any direct or indirect contributions or expenditures in connection with elections or political activities, contributions, if any, may only be made on a personal basis, not on behalf of the Company, and reimbursement must not be sought from the Company, directly or indirectly.

CHARITABLE DONATIONS

Donations to charities with the intention of influencing such charities to become Alumis investors are strictly prohibited. Employees should notify the Chief Compliance Officer about any actual or apparent conflict of interest in connection with any charitable contribution, or about any contribution that could give an appearance of impropriety. In addition, no Alumis employee may make any charitable contribution at the request of any government official without the prior written approval of the Chief Compliance Officer.

INTERNATIONAL BUSINESS

All employees are expected to comply with the laws in all countries in which they operate permanently, temporarily, or incidentally. In some countries certain laws prohibiting particular conduct may not be enforced in practice, but this will not excuse non-compliance. All employees also must comply strictly with U.S. laws and regulations applicable to the conduct of business outside the United States.

ENVIRONMENT, SAFETY AND SUSTAINABILITY

Alumis is committed to a safe environment and to taking sound environmental actions. It is our policy to conduct our business in an environmentally responsible and sustainable way that minimizes environmental impacts and promotes the sustainable use of resources. We are committed to bringing our novel chemistry to patients. We are equally committed to minimizing the use of any substance or material that may cause environmental damage, reducing waste generation and disposing of all waste through safe and responsible methods, minimizing environmental risks by employing safe technologies and operating procedures, and being prepared to respond appropriately to accidents and emergencies.

Federal law imposes criminal liability on any person or company that contaminates the environment with a hazardous substance that could cause injury to the community or environment. Violation of

environmental laws can involve monetary fines and imprisonment. We expect employees to comply with all applicable environmental laws.

APPROVALS AND WAIVERS

Except as otherwise provided in this Code, the Board or the Nominating & Corporate Governance Committee must review and approve any matters requiring special permission under this Code for a Section 16 officer or a member of the Board. Except as otherwise provided in this Code, the Chief Compliance Officer must review and approve any matters requiring special permission under this Code for any other employee, consultant, contractor or other agent.

A “waiver” of this Code is defined by the SEC as the approval by the Company of a material departure from a provision of its code of ethics.

Alumis’ CEO, on behalf of Alumis, and with advice of Legal, the Chief Compliance Officer and/or the Board, may waive the requirements of this Code in writing on a case-by-case basis. Each such waiver shall be promptly disclosed if required by law or regulation, along with the reasons for the waiver.

Any waiver of this Code for Section 16 officers or a member of the Board may be authorized only by the Board or, to the extent permitted by the rules of The Nasdaq Stock Market and Alumis’ Corporate Governance Guidelines, a committee of the Board, and will be disclosed as required by applicable laws, rules and regulations.

REPORTING CONCERNS AND POTENTIAL VIOLATIONS

Every employee has a responsibility to report any potential misconduct, including, but not limited to: discrimination, harassment and violations of Alumis’ policies concerning: (a) accounting, (b) internal accounting controls, (c) disclosure controls or auditing matters, (d) illegal activities in any and all countries in which Alumis operates, (e) fraud, (f) abuse of Alumis’ assets, (g) violations of the standards in this Code, and (h) violations of Alumis’ compliance program.

We are an equal opportunity employer. We do not unlawfully discriminate in employment opportunities or practices on the basis of gender, race, color, religion, age, citizenship, sexual orientation, gender identity, gender expression, marital status, pregnancy, national origin, ancestry, physical or mental disability or condition or any other protected class under applicable federal, state or local laws. We also prohibit unlawful discrimination based on the perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics.

We are committed to maintaining a respectful workplace, which includes a working environment that is free from unlawful harassment. This policy applies to all work-related settings and activities, whether inside or outside the workplace, and includes business trips and business-related social events.

If you believe but are not certain that misconduct or an improper activity may have occurred, you are encouraged to discuss your concern with our Chief Compliance Officer, with Legal or any member of the Executive Committee. This discussion will be kept confidential, consistent with conducting a thorough investigation.

The COMET-line has been set up so that all anonymous reports route directly to our Chief Compliance Officer, Legal and our Chief Financial Officer, who will inform the appropriate members of senior management and, if appropriate, members of the Board of Directors.

Anonymous reports that concern accounting and auditing matters, e.g., embezzlement; falsification of contracts, reports or records; securities violations; and violations of other financial-related policies, will be routed to the Chief Financial Officer and the Chair of the Audit Committee of the Board.

If you choose to identify yourself, your identity will be kept strictly confidential to the extent possible, consistent with conducting a thorough investigation.

- **International:** The COMET-line is accessible from all countries.
- **Investigative Procedures:** Upon learning of an allegation of misconduct, the Chief Compliance Officer or Legal Department will conduct a timely, full and fair fact-finding to determine whether a violation has indeed occurred. Based on findings, the Chief Compliance Officer will seek advice and assistance from Legal, the Chief Financial Officer, the Board (or appropriate Board committees) and/or outside counsel, as necessary.

Notwithstanding the foregoing, and notwithstanding any other confidentiality or nondisclosure agreement (whether in writing or otherwise, including without limitation as part of an employment agreement, separation agreement or similar employment or compensation arrangement) applicable to current or former employees, the Company does not restrict any current or former employee from communicating, cooperating or filing a complaint with any U.S. federal, state or local governmental or law enforcement branch, agency or entity (collectively, a “**Governmental Entity**”) with respect to possible violations of any U.S. federal, state or local law or regulation, or otherwise making disclosures to any Governmental Entity, in each case, that are protected under the whistleblower provisions of any such law or regulation, provided that (i) in each case such communications and disclosures are consistent with applicable law and (ii) the information subject to such disclosure was not obtained by the current or former employee through a communication that was subject to the attorney-client privilege, unless such disclosure of that information would otherwise be permitted by an attorney pursuant to 17 CFR 205.3(d)(2), applicable state attorney conduct rules, or otherwise. Any agreement in conflict with the foregoing is hereby deemed amended by the Company to be consistent with the foregoing.

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The Company reserves the right to amend, alter or terminate this Code at any time for any reason, subject to any applicable law requirements. The Nominating and Corporate Governance Committee will be responsible for reviewing and recommending to the Board for approval any such amendments, alterations or other changes to this Code. The Nominating and Corporate Governance Committee will review and reassess the adequacy of this Code at least annually, and recommend to the Board any changes the Nominating and Corporate Governance Committee determines are appropriate. All changes must be promptly disclosed as required by law or regulation.

This Code, as may be amended from time to time, will be posted on the Company’s website. The Company will state in its annual proxy statement that this Code is available on the Company’s website and provide the website address as required by law or regulation.

**COMET Line
Ethics and Compliance Hotline**

Reports may be made anonymously or in writing, or via Alumis' COMET-line, which is operated by an outside vendor.

Via telephone: The COMET-line is available 24 hours a day, seven days a week, by phone 833-545-3051; or

Via <https://www.whistleblowerservices.com/ALMS>

- ***Addressing reports:*** Alumis will treat any report of misconduct with respect and urgency in order to determine the appropriate course of action, including possible disclosure of any misconduct to stockholders or regulators. Circumventing these internal reporting procedures may cause serious damage to an individual and the Company.
- ***No retaliatory action will be taken against employees making good faith reports.*** Alumis prohibits retaliation against any employee, officer or director who, in good faith, seeks help or reports known or suspected violations. Any reprisal or retaliation against an employee, officer, or director because he or she, in good faith, sought help or filed a report will be subject to disciplinary action, including potential termination of employment.

ACKNOWLEDGEMENT

I have read Alumis' Code of Business Conduct and Ethics, and I understand its contents.

I agree to comply fully with the standards, policies and procedures contained in the Code and with Alumis' related policies and procedures. I commit to research, develop, market, sell, promote, and advertise our products in compliance with the written directives or requirements of all applicable federal, state and international laws. Furthermore, I understand that failure to uphold this commitment will negatively affect my performance evaluation and could result in disciplinary action, up to, and including, termination of my employment, as well as in legal sanctions against me and the Company.

I understand that the Company has a culture based upon our core values and expects all employees, officers, and directors to behave according to those values, and to observe them, both internally and externally, in performing their daily tasks.

I acknowledge that the Code is a statement of policies for business conduct and does not, in any way, constitute an employment contract or an assurance of continued employment.

Printed Name

Date

Signature