**Alkermes plc**
**Comprehensive Compliance Program**

Alkermes plc ("Alkermes") has adopted a Comprehensive Compliance Program in accordance with the April 2003 "Compliance Program Guidelines for Pharmaceutical Manufacturers" from the United States Department of Health and Human Services Office of Inspector General ("OIG Guidance").

Written Standards

Alkermes has a publicly available Code of Business Conduct and Ethics setting forth the company's commitment to compliance by its management, employees and agents. The Code required that employees, officers and directors "…act fairly, honestly, and in good faith in any dealings on behalf of the Company with any of its customers, suppliers, business partners, collaborators, competitors, employees, and all others." The Code of Business Conduct and Ethics is incorporated in relevant part into this Compliance Program and is available on the Corporate Governance page of our web site.

Alkermes has internal policies in place requiring all employees to comply with the provisions of the "Pharmaceutical Research and Manufactures of America") ("PhRMA Code") as well as the OIG Guidance. In addition, the company issues policies on a variety of other matters, including samples, anti-kickback laws, and interaction with government officials. All such policies require strict adherence to applicable laws and regulations. These policies are updated as needed.

Gifts to Medical Professionals

Alkermes has established a limit of $100 per qualifying gift (i.e., a gift that is in compliance with the internal policy referred to above) that may be provided to a health care professional during a given calendar year. Alkermes has established a meal cap of $130 per meal. Where states have required it, Alkermes has implemented a $2,500 per health care professional per year limit on gifts, meals, promotional materials or other items they might receive from Alkermes. These limits do not include the value of samples; grants for medical education; medical scholarships; professional services or other permitted items under the OIG Guidance or relevant state or federal law.

Compliance Oversight Responsibility

Alkermes Legal department, under the discretion of the Chief Compliance Officer of Alkermes, has responsibility for oversight of the Comprehensive Compliance Program. The Chief Compliance Officer has effective lines of communication with other departments of the company and access to the Chief Executive Officer, or the Board of Directors, if required. The Chief

Compliance Officer is also responsible for overseeing compliance implementation, responding promptly to problems and engaging qualified executives as necessary to oversee corrective action.

The company has a toll-free hotline any employee can use to make a report of suspicious activity, anonymously if desired. Any such report relating to this Comprehensive Compliance Program is directed to the Chief Compliance Officer.

Training

All new Alkermes employees are trained on issues contained in the Comprehensive Compliance Program, including compliance with the Code of Business Conduct and Ethics, and their options for reporting concerns. Additional refresher and update training is routinely given to employees covering issues relevant to Alkermes' industry and workplace, including, for employees interacting with health care professionals, those addressed by the PhRMA Code.

Auditing, Monitoring and Discipline

Each operating function within Alkermes has the authority to monitor and audit the activities of its employees and agents for compliance with this Comprehensive Compliance Program. Should wrongdoing on the part of an employee be found, disciplinary action up to, and including, termination of employment may be taken.

Responding and Reporting

Employees must promptly report any violation of the Comprehensive Compliance Program or any policies of the company using any of the available company resources, including the toll-free hotline. Employees making good-faith reports are protected from retaliation. Employees are permitted to cooperate with law enforcement and are required to refrain from taking any action to interfere with any ongoing investigation.

Updates

This Comprehensive Compliance Program may be amended, altered or revised from time-to-time as needed and without prior notice.

**California Compliance Certification**

As of October 21, 2026, Alkermes believes that the above elements of its Comprehensive Compliance Program are in place and operational. Accordingly, to the best of Alkermes' knowledge, we believe we are in compliance in all material respects with the California Health & Safety Code sec. 119402. For a copy of this Comprehensive Compliance Program, you may also call (781) 609-6593.