

ALUMIS INC.

WHISTLEBLOWER AND COMPLAINT POLICY

Adopted by the Board of Directors: June 21, 2024

Effective Date: June 28, 2024

I. PURPOSE

Alumis Inc. (the “*Company*”) is committed to promoting high standards of ethical business conduct and compliance with applicable laws, rules and regulations. As part of this commitment, the Company has adopted this Whistleblower and Complaint Policy (this “*Policy*”). Accordingly, the Company will not tolerate conduct that is in violation of such laws and regulations. Employees are encouraged to use the guidance provided by this Policy to report all known and suspected improper activities in good faith. Any other third party, such as vendors, collaborators, partners, stockholders or competitors, also may report, under the procedures provided in this policy, a good faith complaint regarding accounting or auditing matters. To facilitate the reporting of complaints regarding accounting or auditing matters, the audit committee of our Board of Directors (the “*Audit Committee*”) has established procedures for (i) the receipt, retention and treatment of complaints regarding accounting, internal accounting controls or auditing matters (“*Accounting Matters*”) and (ii) the confidential and anonymous submission by Company employees concerning questionable Accounting Matters. This Policy is designed to provide employees with a confidential or anonymous method for reporting any improper activities. The Company will post a current copy of this Policy on the Company’s internal website. This policy is a supplement to the Code of Business Conduct and Ethics (the “*Code*”) and should be read in conjunction with the Code.

II. SCOPE OF ACCOUNTING MATTERS COVERED BY POLICY

This policy covers complaints relating to Accounting Matters, including, without limitation, the following types of conduct:

- fraud, deliberate error or gross negligence or recklessness in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud, deliberate error or gross negligence or recklessness in the recording and maintaining of financial records of the Company;
- deficiencies in, or noncompliance with, the Company’s internal accounting controls;
- misrepresentation or false statement to management, regulators, the outside auditors or others by a senior officer, accountant or other employee regarding a matter contained in the financial records, financial reports or audit reports of the Company; or
- deviation from full and fair reporting of the Company’s results or financial condition.

III. OTHER REPORTING VIOLATIONS

Employees should also report known and suspected violations of the following to their supervisors or managers:

- laws, governmental rules and regulations; or
- any Company policies, including the Company Workplace Policies.

This includes complaints or reports received from people outside the Company and complaints regarding third parties who provide services to the Company. Supervisors and managers will promptly consider the information submitted to them and take appropriate action in accordance with the Company's policies and ethical business practices, consulting with the Compliance Officer as appropriate. They will also provide any such information to the Company's Compliance Officer (the "**Compliance Officer**"), who will then provide it to the Chairperson (the "**Chair**") of the Company's Board of Directors.

If an employee is not comfortable discussing the suspected violation with any of their direct supervisors or managers, the employee may report the suspected violation confidentially and anonymously by the following means:

1. By calling the Company's compliance hotline toll-free at 833-545-3051 or accessing the following website <https://www.whistleblowerservices.com/ALMS>;
2. By letter addressed to the Company's corporate headquarters at 280 East Grand Avenue, South San Francisco, CA 94080, marked "Attention: Legal Department"; or
3. By email sent to the Company's General Counsel at compliance@alumis.com with "Attention: Legal Department" in the subject line.

Note: If you wish to report anonymously, please follow the instructions to ensure your anonymity is maintained.

Any employee reporting a suspected violation is encouraged to provide as much detail as possible regarding the subject matter of the complaint or concern because the ability to investigate will be largely dependent on the quality and specificity of such information. The Compliance Officer, or his or her designee(s), will be responsible for reviewing, or overseeing the review, of any report of a suspected violation from any source. So long as appropriate, the Compliance Officer will consult with the Chief Executive Officer and the Chief Financial Officer on such complaints. The Compliance Officer will notify the sender and acknowledge receipt of the report, unless the report was submitted anonymously.

If you wish to report a matter directly to the Board of Directors, you may send a letter addressed to the Company's corporate headquarters marked "Attention: Board of Directors." **You may report confidentially and anonymously if you wish.** The Board of Directors will take whatever steps it deems necessary to respond to a report that it receives, which may include referring the matter to the Compliance Officer for investigation.

The Company has designated its General Counsel as its Compliance Officer. In the event of the General Counsel's temporary unavailability, the Company's Chief Financial Officer and Chief Business and Legal Officer will be authorized to serve as the Compliance Officer in the interim.

IV. STATEMENT OF NON-RETALIATION

It is the Company's policy to comply with all applicable laws that protect our employees against unlawful discrimination or retaliation by us or our agents as a result of their lawfully reporting information regarding, or their participation in, investigations involving Accounting Matters. Moreover, the Company does not permit any form of intimidation or retaliation by any employee, contractor,

subcontractor or agent of the Company against any employee because of any lawful act done by the employee to:

- provide information, cause information to be provided, or otherwise assist in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of laws, rules, regulations or any Company policies; or
- file, cause to be filed, testify, participate in, or otherwise assist in a proceeding filed or about to be filed relating to a violation of any law, rule or regulation.

If any employee believes he or she has been subjected to any harassment, threat, demotion, discharge, discrimination or retaliation by the Company or its agents for reporting complaints regarding Accounting Matters in accordance with this policy, he or she may file a complaint with our Compliance Officer. If it is determined that an employee has experienced any improper employment action in violation of this policy, we endeavor to promptly take appropriate corrective action. Please refer to the Company's policy against sexual, other workplace harassment and retaliation set forth in the Company's workplace policies.

V. STATEMENT OF CONFIDENTIALITY

In cases in which an employee reports a suspected violation in good faith and is not engaged in the questionable conduct, the Company will attempt to keep its discussions and actions confidential to the extent possible and in compliance with applicable laws and regulations governing employee privacy. All reports and records associated with complaints or reports made under this Policy are considered Company confidential information and access will be restricted to members of the Board of Directors or the Audit Committee, as appropriate, the Company's internal and external legal counsel, and others involved in investigating a complaint or report under this Policy. Access to reports and records may be granted to other parties at the discretion of the Compliance Officer.

VI. POLICY FOR RECEIVING AND INVESTIGATING COMPLAINTS

Upon receipt of a complaint, the Compliance Officer (or his or her designee) will determine whether the information alleged in the complaint pertains to an Accounting Matter. The Audit Committee shall be notified promptly of all complaints determined to pertain to an Accounting Matter and shall determine the planned course of action with respect to the complaint, including determining that an adequate basis exists for commencing an investigation. The Compliance Officer will then appoint one or more internal and/or external investigators to promptly and fully investigate each viable claim under the direction and oversight of the Audit Committee or such other persons as the Audit Committee determines to be appropriate under the circumstances. The Compliance Officer will confidentially inform the reporting person (if his or her identity is known) that the complaint has been received and provide him or her with the name of, and contact information for, the investigator assigned to the claim.

Confidentiality of the employee submitting the complaint will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation. In the course of any investigation, the Company may find it necessary to share information with others on a "need to know" basis. If the investigation confirms that a violation has occurred, the Company will promptly take appropriate corrective action with respect to the persons involved, including discipline up to and including termination, and, in appropriate circumstances, referral to governmental authorities, and will also take appropriate steps to correct and remedy any violation.

VII. RETENTION OF RECORDS

The Compliance Officer will maintain a log of all complaints, tracking their receipt, investigation and resolution, and shall prepare a periodic summary report thereof for each member of the Audit Committee. Each member of the Audit Committee and, at the discretion of the Compliance Officer, other personnel involved in the investigation of complaints, shall have access to the log. Copies of the log and all documents obtained or created in connection with any investigation will be preserved for a period of time to be determined by the Compliance Officer. After the established retention period, the records and associated log(s) may be disposed of in accordance with the Company policy.

VIII. REPORTING TO THE BOARD OF DIRECTORS

The Compliance Officer will report to the Board of Directors or the Audit Committee, as appropriate, on the nature of all reports of suspected violations received as soon as reasonably practicable. The Board of Directors (or the Audit Committee) will take whatever steps it deems necessary to respond to any violation report received by the Company.

IX. POLICY ADMINISTRATION

The Board of Directors is responsible for reviewing this Policy and confirming that the procedures contained in this Policy are in place. It may request reports from the Company's executives about the implementation of this Policy and take any other steps in connection with that implementation as it deems necessary. The Board of Directors may amend this Policy and procedures associated with this Policy at its discretion.