



AKARI THERAPEUTICS, PLC

CODE OF ETHICS FOR PRINCIPAL EXECUTIVE OFFICER AND SENIOR FINANCIAL OFFICERS

Akari Therapeutics, Plc. (“Akari” or the “Company”) has a *Code of Business Conduct and Ethics* and other policies and procedures adopted by Akari which are applicable to all directors, officers and employees of the Company. Akari’s Chief Executive Officer (“CEO”) which is Akari’s principal executive officer (“PEO”) and all senior financial officers, including the chief financial officer and the principal accounting officer or controller, or persons performing similar functions (each a “Senior Financial Officer”), are bound by the provisions set forth therein all as amended by Akari from time to time, including those relating to ethical conduct, conflicts of interest and compliance with law. As a supplement to and not a replacement for the Code of Business Conduct and Ethics and Akari’s other policies and procedures, the PEO and Senior Financial Officers are subject to the following additional specific policies (this “Code”):

1. The PEO and all Senior Financial Officers are responsible for full, fair, accurate, timely and understandable disclosure in the reports and documents filed by the Company with the Securities and Exchange Commission and in other public communications made by the Company. Accordingly, it is the responsibility of the PEO and each Senior Financial Officer promptly to bring to the attention of the Audit Committee any material information of which they may become aware that affects the disclosures made by the Company in its public filings or otherwise assist the Audit Committee in fulfilling its responsibilities as specified on financial reporting and disclosure.
2. The PEO and all Senior Financial Officers shall act in good faith, responsibly, with due care, competence and diligence, and without misrepresenting material facts or allowing their independent judgment to be subordinated.
3. The PEO and all Senior Financial Officers shall engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships, including without limitation holding a substantial equity, debt, or other financial interest in any competitor, supplier or customer of the Company, or having a personal financial interest in any transaction involving the purchase or sale by the Company of any products, materials, equipment, services or property, other than through transactions approved by Akari’s board of directors (the “Board”) or the Board’s Audit Committee (the “Audit Committee”). Any such actual or apparent conflict of interest shall be brought to the attention of the Audit Committee.
4. The PEO and all Senior Financial Officers shall respect the confidentiality of information acquired in the course of their work except when authorized or otherwise legally obligated to disclose such information. Confidential information acquired in the course of their work may not be used for personal advantage.
5. The PEO and all Senior Financial Officers shall use any and all Company assets and resources employed or entrusted to them in a responsible manner.

6. The PEO and all Senior Financial Officers shall, and shall strive to ensure that all other officers and employees, carry out their duties in compliance with all applicable governmental laws, rules and regulations and with the rules and regulations of private and public regulatory agencies having jurisdiction over the Company.
7. The PEO and each Senior Financial Officer shall promptly bring to the attention of the Audit Committee any information they may have concerning (a) significant deficiencies in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize and report financial data or (b) any fraud, whether or not material, that involves any director, officer or other employee who has a significant role in the Company's financial reporting, disclosure or internal controls for disclosure and financial reporting.
8. The PEO and each Senior Financial Officer shall promptly bring to the attention of the Audit Committee any information they may have concerning any actual or apparent conflict of interest, whether in the past or ongoing, between personal and professional relationships, involving themselves or any other officer or employee or director who has a significant role in the Company's financial reporting, disclosure or internal controls for disclosure and financial reporting.
9. The PEO and each Senior Financial Officer shall promptly bring to the attention of the Audit Committee any information they may have concerning evidence of any violation of the securities or other laws, rules or regulations applicable to the Company and the operation of its business, by the Company or any agent thereof, or of violation of the Code of Conduct, the Company's other policies or procedures, or of this Code.
10. Any proposed waiver of this Code or amendments thereto may only be granted by the Board upon written request, and any such waivers or amendments shall be disclosed promptly as required by law.
11. The PEO and each Senior Financial Officer are accountable for adherence to this Code. The Board shall determine, or designate appropriate persons to determine, appropriate actions to be taken in the event of violations of the Code of Conduct or of this Code by the PEO and the Senior Financial Officers. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to the Code of Conduct and to this Code, and shall include written notices to the individual involved that the Board has determined that there has been a violation, censure by the Board, demotion or re-assignment of the individual involved, suspension with or without pay or benefits, and termination of the individual's employment, all as determined by the Board. In determining what action is appropriate in a particular case, the Board or such designee shall take into account all relevant information, including the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action and whether or not the individual in question had committed other violations in the past.

Adopted by Akari's Board of Directors on June 5, 2023.

APPENDIX A

AGREEMENT TO COMPLY

I have read the Akari Therapeutics, Plc (the "Company") Code of Ethics for Principal Executive Officer and Senior Financial Officers (the "Code"). I have had the opportunity to ask and receive answers to any questions about the Code. I agree to abide by the provisions of the Code.

I acknowledge that:

_____ To the best of my knowledge, I am not in violation of, or aware of any violation by others of, any provision contained in the Code;

OR

_____ I have made a full disclosure on the reverse side of this acknowledgement of the facts regarding any possible violation of the provisions set forth in the Code whether by myself or by others.

In addition, I understand, acknowledge and agree that I am required to report each suspected or actual violation of the Code, and that I may make such reports on an anonymous basis as set forth in the Code. I understand that I am required to cooperate fully with the Company in the investigation of any suspected violation. I understand that my failure to comply with the Code may result in disciplinary action, up to and including termination and, depending on the nature of my violation, may result in the Company reporting my violation to regulatory or law enforcement personnel.

Signature: _____

Date: _____

Name (Please print): _____