

AKARI THERAPEUTICS, PLC

Whistleblower Policy

The purpose of this Whistleblower Policy (the “Policy”) is to make employees of Akari Therapeutics, Plc and its subsidiaries (the “Company”) aware of the importance of reporting to the Company any suspected violations of law, acts of fraud against shareholders, or questionable auditing or accounting matters.

As a public company, the Company prohibits any type of corporate fraud and is committed to protecting employees from adverse employment actions as a result of their whistleblowing activities.

This Policy also provides employees with the proper channels to report any suspected violations of criminal law or securities law, acts of fraud against shareholders or questionable auditing or accounting matters. The Company requires that all employees comply with this Policy.

Examples of violations include, but are not limited to:

- a failure to comply with the Company’s accounting practices or internal controls,
- a violation of securities laws, criminal laws, laws regarding mail, wire or bank fraud, or laws relating to fraud against shareholders,
- a violation of rules or regulations of the Securities and Exchange Commission,
- a misapplication of generally accepted accounting principles, and
- any other questionable or irregular accounting or auditing practice.

Any employee who becomes aware of or comes into possession of information concerning a violation or possible violation and who reasonably believes that such a violation has occurred or will occur must promptly report such information. Confidentiality will be maintained in accordance with the law and the matter shall be fully investigated. Any report should include precise and relevant facts (i.e. dates, places, persons/witnesses, numbers, etc.) sufficient for a reasonable investigation to be conducted.

The following mechanisms have been established to allow for reporting:

- Use the Hotline - either the phone number or the website; or
- Send an email to Donald Williams, Chairman of the Audit Committee, at DonWilliams.SD@gmail.com or contact him directly at (858) 692-5408; or
- Send an email to Robert M. Shaw, the Company’s General Counsel, at robert.shaw@akaritx.com or contact him directly at (718) 312-3814.

Any employee who makes a report of a matter which she or he reasonably believes constitutes a violation of a criminal statute by the Company, or its agents acting on behalf of the Company, to a law enforcement officer or, using the mechanisms set forth above, to the Company, will not be fired, demoted or otherwise harmed for, or because of, the reporting of the suspected violation, regardless of whether the suspected violation involves the employee, the employee’s supervisor or senior management of the Company.

However, a reporting employee who has committed a violation may be subject to disciplinary action or to prosecution under applicable law. The act of reporting is protected but not the actual violation.

From time to time, this Policy may need to be amended due to changes in the law, the Company's operations, or changes in the requirements of the stock exchange on which the Company's securities are traded.

The current version of this Policy will be available on the Company's website or may be obtained by contacting the Company's General Counsel.