

# California Compliance Law

Acacia maintains compliance with California Health & Safety Code § 119402 via the Corporate Compliance Program of its parent Eagle Pharmaceuticals, Inc.

**NOTICE: This information is provided pursuant to the requirements of California Health & Safety Code, Section 119402, which requires pharmaceutical companies doing business in California to make available their Compliance Program and annual written declaration of compliance with the Compliance Program.**

## EAGLE PHARMACEUTICAL INC.'S CORPORATE COMPLIANCE PROGRAM

Eagle Pharmaceuticals, Inc. ("Eagle") has implemented a Corporate Compliance Program that incorporates the fundamental elements described in the Health and Human Services Office of Inspector General's Compliance Program Guidance for Pharmaceutical Manufacturers (2003) ("OIG Guidance"). The Corporate Compliance Program is reasonably designed to foster compliance with federal, state and local laws, rules and regulations; the most recent version of the Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals ("PhRMA Code"); and other guidelines relevant to our business. Our Corporate Compliance Program is a key component of Eagle's commitment to the highest standards of ethical and responsible corporate conduct.

### *Compliance Officer & Compliance Committee*

Eagle has a Chief Compliance Officer responsible for developing, implementing, operating and monitoring a comprehensive and effective Corporate Compliance Program. Eagle also has established a Corporate Compliance Committee that is responsible for assisting the Chief Compliance Officer in fulfilling his/her responsibilities and overseeing the operation of the Corporate Compliance Program.

### *Written Standards of Conduct, Policies and Procedures*

Eagle's Code of Business Conduct and Ethics reflects the ethical, legal and compliance principles applicable to our employees, officers and directors. The Code of Business Conduct and Ethics is supplemented by more detailed policies, procedures and other guidelines that address compliance risk areas, including areas identified in the OIG Guidance and PhRMA Code.

### *Employee Training and Education*

Eagle's field sales employees have been trained on a variety of compliance-related topics. All Eagle employees will complete annual training related to Eagle's Corporate Compliance Program and other risk areas specific to the employee's job function. Training programs will be reviewed and updated periodically.

### *Reporting Compliance Concerns*

Eagle is committed to fostering open communication with our employees and agents to raise compliance questions or potential concerns without fear of retaliation. Eagle maintains a compliance hotline (855-679-2699 (telephone), and website at <http://www.openboard.info/EGRX/> (website)), which are available 24 hours per day, 365 days per year. Individuals using the hotline can remain anonymous. Eagle also encourages employees to raise questions or concerns directly to their manager, Compliance, Legal or Human Resources.

### *Auditing and Monitoring*

Eagle reviews and assesses business activities for compliance with applicable laws, regulations, guidelines, and company policies and procedures. Corrective action plans are developed to address concerns identified through these reviews.

### *Disciplinary Guidelines*

Eagle takes disciplinary action in response to violations of applicable laws, regulations, guidelines, Eagle's Code of Business Conduct and Ethics, and company policies and procedures. Disciplinary action may include warnings, suspension and termination of employment.

### *Corrective Action*

Eagle takes steps to respond appropriately to issues that are identified or reported. Corrective action may be taken to address identified issues, including disciplinary action, training, improvement of policies and procedures, and monitoring or auditing activities.

### **CALIFORNIA HEALTH & SAFETY CODE §§ 119400-119402**

Eagle has established an annual dollar limit of \$1,000.00 for gifts (defined as anything of value provided for free, including meals), promotional materials, or other transfers of value including items or activities that Eagle employees may give or otherwise provide to an individual medical or health care professional licensed by the state of California in accordance with California Health & Safety Code §§ 119400-119402. This dollar limit represents a spending maximum and not an average or goal. Eagle reserves the right to change this limit at any time.

### **ANNUAL CERTIFICATION AS OF JULY 1, 2023**

To our knowledge, and based on our good faith understanding of the statutory requirements, Eagle declares that it is in compliance in all material respects with our Corporate Compliance Program and the requirements of California Health & Safety Code §§ 119400-119402.

*For a copy of our Corporate Compliance Program or annual disclosure, please call (1-855-318-2170).*