

Acacia Pharma, Inc. Comprehensive Compliance Program for Sales and Marketing Activities in Accordance with California Law

A. General

This Comprehensive Compliance Program for Sales and Marketing Activities (the “Compliance Program”) of Acacia Pharma, Inc. (“Acacia” or “Company”) has been adopted by the Compliance Committee of Acacia. The purpose of this Compliance Program is to promote compliance with applicable laws, rules, and regulations and to promote ethical and responsible decision making in the sale and marketing of its products. Acacia will review and update this Compliance Program from time to time as it reasonably deems appropriate.

B. Compliance Officer & Compliance Committee

Acacia was recently acquired by Eagle Pharmaceuticals, Inc. (“Eagle”) and has become a wholly owned subsidiary of Eagle. Acacia is being integrated into Eagle’s robust compliance program, which includes a Chief Compliance Officer responsible for operating and monitoring an effective Corporate Compliance Program, and a Corporate Compliance Committee, responsible for assisting the Chief Compliance Officer in fulfilling his/her duties and overseeing the operation of the Corporate Compliance Program.

C. Written Standards of Conduct, Policies, and Procedures

Acacia has developed written policies and procedures addressing compliance issues in connection with its interactions with medical and other healthcare professionals and related activities. These policies and procedures are designed to ensure compliance with the recommendations set forth by the United States Department of Health and Human Services’ Office of the Inspector General, and in the Pharmaceutical Research and Manufacturers of America Code on Interactions with Health Care Professionals. The Compliance Committee with support from individual Company designees are responsible for approving such written policies and procedures and will periodically review and revise certain policies and procedures as it deems appropriate.

D. Annual Dollar Limit on Gifts or Incentives Provided to Medical or Health Professionals in California

As required by, and in accordance with the definitions set forth in California Health and Safety Code §§ 119400-119402, Acacia has established an annual dollar limit of \$2,500 for gifts, promotional materials, or items or activities that the company may give or otherwise provide to an individual medical or health care professional in California.

E. Training

Acacia’s compliance policies and procedures are distributed to appropriate employees. Acacia personnel are required to participate in training relevant to their positions and

certify in writing as to their participation in such training. All employees are required to undergo additional periodic training as deemed necessary to meet the objectives of the Compliance Program.

F. Monitoring of Sales and Marketing Activities

From time to time, Acacia will select certain sales and marketing activities to review to confirm that the selected activities are being carried out in accordance with the relevant Acacia policies and procedures, as well as all applicable laws, regulations and rules.

G. Procedures for Reporting Violations

Acacia employees are encouraged to report any known or suspected compliance violations to their supervisor, to Human Resources Department or to senior management. Acacia has also established an Ethics Hotline that is available 24 hours a day, seven days a week at 1-833-717-0397. Employees may submit anonymous reports through the Hotline. Confidential reports may also be made online at: <https://acaciapharma.ethicspoint.com>. All reports are documented and reported to appropriate management and/or individual Company designees.

H. Investigations, Corrective Actions and Disciplinary Policies

In the event that Acacia becomes aware of any known or suspected compliance violation, through either the routine monitoring of its sales and marketing activities or a reported violation, an investigation will be conducted to review the circumstances surrounding the known or suspected violation and will take appropriate corrective action, which may involve disciplinary action, up to and including termination.

I. Copies of Compliance Program and Annual Declaration

Copies of this Compliance Program and Acacia's Annual Declaration of Compliance for California can be requested by calling the Ethics Hotline at 1-833-717-0397 or from Acacia's website at www.acaciapharma.com.