

COMPREHENSIVE COMPLIANCE PROGRAM DESCRIPTION

Introduction

Corium, LLC. (“Corium”), has developed a Comprehensive Compliance Program (“Compliance Program”) that comports with California Health & Safety Code §§ 119400-119402, the Compliance Program Guidance for Pharmaceutical Manufacturers published by the U.S. Department of Health and Human Services Office of Inspector General (“OIG Guidance”), and the Pharmaceutical Research and Manufacturers of America (“PhRMA”) Code on Interactions with Health Care Professionals (“PhRMA Code”).

Corium is committed to doing business in accordance with the highest standards of business conduct and ethics. In accordance with this commitment, Corium has established and abides by the Compliance Program. The Compliance Program is a dynamic program that provides a flexible framework for adapting to the changing environment in which Corium operates.

Compliance Program Components

(1) Compliance Officer. Corium has designated a Compliance Officer (“CO”) to design, implement and oversee the Compliance Program. The CO reports to the Chief Executive Officer (“CEO”); has direct access to the Board of Directors (the “Board”); regularly informs the CEO, the Board, and Corium’s Compliance Committee on the Compliance Program and any significant compliance risks, concerns, issues, or violations that may come to the attention of the CO.

(2) Corium Compliance Committee. The Corium Compliance Committee advises and assists the CO in the implementation and effective operation of the Compliance Program.

(3) Code of Business Conduct and Ethics, Policies, and Procedures. Corium has developed and implemented a written Code of Business Conduct and Ethics (“Code”) that effectively sets forth Corium’s compliance obligations, including compliance with all applicable laws and regulations. In addition, Corium has developed, and will continue to develop, policies and procedures that capture Corium’s commitment to compliance, effectively address Corium’s compliance obligations, provide clarity in terms of how to conduct a given activity in a compliant manner, and account for specific areas of risk relevant to pharmaceutical companies. Compliance with the Code and all applicable policies and procedures is a condition of employment and an element in evaluating the performance of all Corium employees.

(4) Education and Training. Corium has developed and delivered, and will continue to develop and deliver, regular and effective compliance education and training programs for all Corium personnel, including the Board. Compliance education and training at Corium is and will be targeted where necessary, by function and topic to maximize its effectiveness.

(5) Lines of Communication. Corium has a disclosure program which encourages all Corium personnel to engage in an open, frank, and productive compliance dialogue and has developed, and will continue to develop, vehicles and mechanisms for promoting this dialogue. The disclosure program includes a reporting mechanism (e.g., a toll-free hotline) through which Corium personnel can make anonymous compliance inquiries or anonymously report compliance concerns or potential compliance violations. The disclosure program is publicized and conducted in a manner that emphasizes a strict non-retribution and nonretaliation policy.

(6) Monitoring and Auditing. Corium’s Compliance Program includes regular monitoring and auditing of compliance risk areas, in addition to conducting periodic compliance risk assessments of relevant functional areas of the Company.

(7) Investigation and Enforcement. Corium will promptly respond to alleged compliance violations by conducting a thorough investigation of the alleged violation, taking appropriate disciplinary action for established violations, and identifying potential preventative measures to help prevent the recurrence of similar violations. Corrective actions considered by Corium include: (a) addressing any gaps in policies, practices, training or understanding that may have contributed to a violation; (b) imposing a range of disciplinary measures, up to and including termination from employment and contract termination; and (c) reporting the violation to the appropriate government authorities when warranted.

(8) Spending Limits. For purposes of complying with the California Health and Safety Code § 119402, Corium has established a maximum annual limit of \$2,000 on meals, promotional materials, or other items that Corium may give or otherwise provide to an individual California “medical or health care professional” (as defined under California law). This limit does not imply that Corium in fact provides anything or combination of things reaching that maximum.

DECLARATION OF COMPLIANCE

To the best of our knowledge and based on our good faith understanding of the statutory requirements, we declare that Corium is in material compliance with its Compliance Program, as well as the requirements of the California Health & Safety Code §§ 119400-119402, as of December 31, 2023. Corium is committed to assessing ongoing compliance with its Compliance Program, which is designed to prevent, detect, and address potential and actual non-compliance with applicable laws, regulations, and the Program itself.

Copies of this Declaration and the Compliance Program are available by contacting us at (844) 575-1082 or emailing us at legal@corium.com.