

The SEMNUR Comprehensive Compliance Program

(As required by the California Health & Safety Code sections 119400-119402)

SEMNUR is committed to harnessing the power of revolutionary delivery technologies designed to safely and effectively provide therapies to those who need them most. With a passion for patients and a dedication to innovation, SEMNUR is lighting the way forward in pain management. We exercise that commitment by being responsible by design and maintaining high standards of honest and ethical business conduct. At SEMNUR, integrity and reputation depend on the honesty, transparency, fairness and integrity of each person associated with us.

Our Code of Business Conduct and Ethics states the business practices and principles of behavior and our commitment to them. SEMNUR's Code of Conduct is available to the public through its posting on this website.

To conduct our business with high ethics and integrity, SEMNUR has established a comprehensive compliance program. This program has been developed in accordance with the laws applicable to our industry, the "Program Guidance for Pharmaceutical Manufacturers" published by the Office of the Inspector General of the U.S. Department of Health and Human Services and the Code of Interactions with Healthcare Professionals of the Pharmaceutical Research and Manufacturers of America (PhRMA).

Consistent with the OIG Guidance SEMNUR's compliance program includes:

- A compliance officer and compliance committee responsible for developing, operating and monitoring the compliance program and with authority to report directly to the board of directors and the company's chief executive officer.
- Written standards of conduct, policies, and practices that document the company's commitment to compliance and requirements to strictly follow fraud and abuse laws, including:
 - The integrity of company-generated data that is used for government reimbursement purposes.
 - Prohibition of kickbacks and illegal remuneration to any persons to gain business.
 - Compliance with laws regulating drug samples.
 - Promotion and product information that are truthful and not misleading.
- Easy to understand, effective and readily available education and training programs for all employees.
- Lines of communication between the compliance officer and all employees, including a process to receive complaints and ask questions (a hotline). Our policies and practices protect the anonymity of employees who make complaints, and we prohibit retaliation.
- A developing audit and monitoring program to identify and address risk.
- Enforcement of compliance obligations through guidelines that include disciplinary action for noncompliance.

- Mechanisms to promptly and properly investigate and respond to reports of noncompliance, including processes to initiate corrective measures and to report offenses to the relevant government authorities when and where appropriate.

In addition, SEMNUR has adopted policies and practices consistent with the PhRMA Code that govern the interactions with healthcare professionals. These policies include:

- Support for medical education, as well as the use of healthcare professionals to provide services to the Company as researchers, consultants and speakers.
- Provision of business courtesies.
- Making of grants and charitable contributions so that such funds are not conditioned, express or implied, on any agreement to prescribe, purchase, recommend, influence or provide favorable formulary status for any SEMNUR product.
- Promotion of SEMNUR products in compliance with the U.S. Food and Drug Administration's regulatory framework regarding promotion of pharmaceutical products.

Copies of the SEMNUR California Declaration of Compliance, SEMNUR Comprehensive Compliance Program description, and SEMNUR Code of Conduct can be obtained on our website at www.semnurpharma.com.