

2026 Annual Declaration for Purposes of Compliance with California Health and Safety Code, §§ 119400-119402

Acrotech Biopharma Inc. (“Acrotech”) has implemented a comprehensive Ethics & Compliance program to help ensure that its commercial practices adhere to industry statutes, regulations, and requirements of federal healthcare programs.

As part of this Program, Acrotech expects its employees to comply with the following laws, rules, and guidance, as applicable:

- Healthcare compliance laws
- OIG/FDA Guidance
- PhRMA Code
- Acrotech’s Code of Ethics and Business Conduct
- Acrotech’s policies related to interactions with healthcare professionals and commercial practices.

Based on a good faith understanding of the requirements of California Health and Safety Code, (§§ 119400-119402), Acrotech is in compliance with all material aspects of the statute.

In the event Acrotech becomes aware of potential violations of law or company policy, Acrotech will take reasonable steps to investigate the matter, pursue disciplinary action, and/or implement corrective measures to prevent future violations.

In accordance with California Health and Safety Code, (§§ 119400-119402), Acrotech has established an annual aggregate dollar limit of \$1,500.00 per healthcare professional licensed in California for the following items:

- Business meals provided in connection with informational presentations or scientific exchange and conducted with substantial interaction
- Educational items intended to enhance patient care

The above annual limit excludes:

- Drug samples provided to healthcare professionals
- Financial support of continuing medical education programs
- Financial support for health education scholarships
- Payments for legitimate professional services based on fair market value, and any meals or expenses associated with the provision of such services
- Research sponsorship and related activities

This limit has been communicated to Acrotech leadership and employees who are expected to manage their spending to comply.