

SHAREHOLDER COMMUNICATION PROCEDURES

Assertio Holdings, Inc. (the “Company”) believes that communication between the Board, shareholders and other interested stakeholders is an important part of the Company’s corporate governance process. To this end, the Board provides a process for shareholders to send communications to the Board, any individual director or the non- management directors as a group, through the Chairman of the Board or, whenever the Chairman is not an independent director, the Lead Independent Director (the “Board Leader”). Communications may be sent in writing or by email to:

Shareholder Communications
c/o General Counsel, Assertio Holdings, Inc
100 South Saunders Road, Suite 300
Lake Forest, Illinois 60045
Email: corpgov@assertiotx.com

The non-employee directors have established the following procedures for the Corporate Secretary of the Company to follow in dealing with all direct communications, including if and when such communications should be shared with the Company’s executive management:

- A. The Corporate Secretary of the Company will act as agent for the Board Leader in facilitating direct communications to the Board.
- B. In his or her capacity as agent, the Corporate Secretary of the Company may review, sort and summarize the communications. The Corporate Secretary will not, however, “filter out” any direct communications from being presented to the Board Leader without explicit instruction from the Board Leader, and in such event, any communication that has been filtered out will be made available to any non- employee director who asks to review it. The Corporate Secretary of the Company will not make independent decisions with regard to what communications are forwarded to the Board Leader.
- C. The Board Leader and non-employee directors have instructed the Corporate Secretary of the Company to:
 1. Refer good faith allegations of improper accounting, internal controls, auditing or financial matters affecting the Company to the Audit Committee;
 2. Refer good faith allegations of other improper conduct affecting the Company to the Board Leader;
 3. Refer questions or comments concerning the Company’s general corporate governance or corporate affairs to the Board Leader; and

4. Refer all other questions regarding product issues, human resources or other similar concerns to the appropriate internal department in the Company for response.
- D. The Corporate Secretary of the Company will send a reply to the sender of each communication acknowledging receipt of the communication.
 - E. The content of the communication will be shared with the Company's management only if deemed appropriate by the Board Leader.
 - F. It is the policy of the Company as stated in its (i) Code of Business Conduct and Ethics and (ii) procedures for the receipt, retention, and treatment of complaints regarding (1) accounting, internal accounting controls, and auditing matters, and (2) the confidential submission by employees of concerns regarding questionable accounting or auditing matters relating to the Company, to not allow retaliation for reports made in good faith. In addition, the Sarbanes-Oxley Act of 2002 specifically prohibits the Company or any of its employees from discriminating against an employee who reports fraud in violation of a rule or regulation of the U.S. Securities and Exchange Commission or any provision of Federal law regarding fraud against shareholders.