

CORPORATE RESPONSIBILITY STATEMENT

At Assertio Holdings, Inc. (“Assertio”), we approach corporate responsibility in the same manner as we approach our business and our compliance program - with an approach that is based on our four core principles (“Core Principles”) and the three pillars (“Pillars”) that support our Core Principles.

Our Core Principles, each of which is further defined below, serve as the touchstones that we expect to guide our employees’ actions on behalf of the Company, including with regard to compliance with applicable laws and regulations. The Core Principles form the foundation of our business and guide the daily interactions of all employees, including sales representatives. Further, our sense of corporate responsibility is pursued with integrity in accordance with applicable industry standards, laws and regulations.

CORE PRINCIPLES

The core principles that form the foundation of our business and guide the daily interactions of all employees, including sales representatives, are as follows:

Ethically Promote Our Products

We are committed to promoting our products in an ethical manner. To ensure compliance with this Core Principle, all sales representatives who are involved in the promotion of a particular Company product are expected to know and understand the information in the product’s label, and must successfully complete Company product training and compliance training consistent with the Company’s comprehensive compliance program. In promotional interactions with healthcare professionals (“HCPs”), consumers, or any other external party, sales representatives are expected to communicate truthful, on-label information about Company products, and all discussions are required to be consistent with the Company’s comprehensive compliance program.

To facilitate ethical promotion of Company products, we provide thorough training to our sales representatives to educate them on the legal and ethical principles that apply to product promotion. We use a variety of media and communication strategies to enhance the effectiveness of our training program. Our sales representatives are expected to comply with the training they receive.

Preserve the Relationship between Healthcare Professionals and Patients

We believe that patient care should be based on patient needs and a HCP’s medical knowledge and experience, and that patient care should not be improperly influenced by individuals or entities outside of the HCP/patient relationship. Therefore, we believe our interactions with HCPs should be focused on informing HCPs about our products, providing scientific and educational information, and supporting medical research and education. To ensure the integrity of medical decisions, we do not offer or provide improper inducements or rewards to HCPs or consumers.

Ensure Patient Safety and Access to Company Products

We are committed to ensuring the safe use of our products. Safe use of medical products may require instruction, education, training and technical support. In such instances, we provide HCPs with educational programs and training related to our products. We also provide support to independent external organizations that provide important educational opportunities to HCPs.

Patient access to physician prescribed medical products can be challenging. The cost of medical products can also be financially burdensome for many patients. We support programs to help reduce such barriers to access so patients may get the medicines their physicians determine is most appropriate based on their medical condition.

Protect Patient Privacy

We recognize the importance of protecting patient privacy and have established policies and requirements to avoid affirmative contact with confidential patient information (unless patient consent is received) and to ensure appropriate handling of any confidential patient information that our sales representatives inadvertently receive. Any business activities involving patients or consumers are expected to be conducted in accordance with applicable industry standards, laws, and regulations, and the Company's comprehensive compliance program.

Our commitment to corporate responsibility, both in our business and in our compliance program, is supported by the Pillars described below. Our training programs and organizational structures have been developed to enable everyone to understand the Pillars and how to implement them to support our Core Principles.

PILLARS

Patients First

We are inspired by patients. This inspiration motivates us to develop and make available high-quality medicines that help people live longer, healthier lives. We continually challenge ourselves to meet and exceed the highest standards of performance, integrity and compliance. By endeavoring to always putting patients first, we believe we can ensure that we can meet the high standards we aspire to achieve.

Ethical and Responsible Interactions with Healthcare Professionals

Ethical and responsible relationships with HCPs are critical to our mission of helping patients by developing and marketing needed medicines. In order for HCPs to make the right choices for their patients and achieve positive health outcomes, we believe it is important that HCPs understand the attributes of available treatment options. An important part of achieving our mission is to ensure that in our interactions with HCPs, we provide information about the risks and benefits of our products and their role in patient healthcare. We have developed compliance policies and employee training programs that provide guidance on appropriate

interactions with HCPs and emphasize adherence to applicable laws and regulations for all employees who market our products.

Tone at the Top

Our leaders and managers are responsible for establishing and maintaining our culture and integrating that culture into everything we do. The tone at the top reinforces our guiding values and ethical culture. Properly nurtured, we believe that this corporate value is the foundation upon which the culture of our company is built.

We are committed to conducting business with the highest degrees of integrity, professionalism and social responsibility. We are also committed to complying with all of the laws, regulations, and industry codes of conduct that apply to our business.