

California Compliance Program Declaration

Effective July 1, 2025

Shorla Oncology has adopted a Comprehensive Compliance Program (“CCP”) in accordance with California Health & Safety Code §§ 119400–119402, the U.S. Department of Health and Human Services Office of Inspector General’s Compliance Program Guidance for Pharmaceutical Manufacturers, and the PhRMA Code on Interactions with Health Care Professionals. The CCP reflects Shorla’s commitment to conducting business in an ethical, transparent, and compliant manner, consistent with all applicable laws, regulations, and industry standards.

Oversight of the CCP resides with Shorla’s Commercial Compliance Officer, who has direct access to senior management and the Board of Directors. The Commercial Compliance Officer is supported by a cross-functional Compliance Committee comprised of senior leaders from key business units. This governance framework ensures that compliance responsibilities are integrated throughout the organization and that the CCP is regularly reviewed and updated to reflect evolving legal and regulatory requirements.

The CCP includes a comprehensive set of written policies and procedures, including Shorla’s Code of Business Conduct and Healthcare Compliance Manual, which provide guidance on appropriate interactions with health care professionals, government officials, patients, and third parties. Employees are trained on these standards on a regular basis. Shorla provides a dedicated compliance email address to allow employees and stakeholders to raise questions or concerns confidentially and without fear of retaliation.

As required under California law, Shorla has established an annual aggregate dollar limit on promotional activities directed to California health care professionals. Shorla also maintains policies designed to ensure that any such interactions are appropriate, educational, and conducted in compliance with applicable laws and guidance. The CCP excludes categories of activities permitted by law, such as the distribution of drug samples, financial support for continuing medical education, scholarships, and payments for bona fide professional services at fair market value.

The CCP further incorporates monitoring, auditing, and risk assessment processes proportionate to the size and scope of Shorla’s business. These processes are designed to detect and address potential issues, ensure timely corrective action when necessary, and support a culture of accountability and continuous improvement.

To the best of our knowledge, and based on a good-faith understanding of the statutory requirements, Shorla Oncology declares that it is in compliance with its Comprehensive Compliance Program and with California Health & Safety Code § 119402 as of July 1, 2025.

In accordance with California law, this declaration is publicly available on Shorla Oncology’s website. A copy of Shorla’s Comprehensive Compliance Program and this declaration may also be obtained by contacting us at commercial_compliance@shorlaoncology.com.