State Compliance Program Declarations

Shorla Oncology ("**Company**") has adopted and maintains compliance programs designed to promote ethical conduct and compliance with applicable federal and state laws, regulations, and industry standards governing interactions with health care professionals and other stakeholders.

The following state-specific declarations are provided to satisfy applicable state law requirements. Each declaration reflects the Company's good-faith assessment of compliance as of the applicable effective date and is reviewed and updated on an annual basis.

California Compliance Program Declaration

Effective Date: January 1, 2026

The Company has adopted and maintains 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 is designed to prevent, detect, and address potential violations of applicable laws and to ensure that the Company conducts business in an ethical, transparent, and compliant manner.

Oversight of the CCP is the responsibility of the Company's Compliance Officer, who has access to senior management and, where appropriate, the Board of Directors. The Compliance Officer is supported by a cross-functional compliance governance structure to ensure that compliance responsibilities are integrated throughout the organization and that the CCP is periodically reviewed and updated.

The CCP includes written policies and procedures governing interactions with health care professionals, government officials, patients, and third parties; compliance training; and mechanisms for confidential reporting of compliance concerns without fear of retaliation.

As required by California law, the Company has established an annual aggregate dollar limit on expenditures for California health care professionals, excluding categories of activity permitted by law, including the provision of drug samples, financial support for continuing medical education, scholarships, and payments for bona fide professional services provided at fair market value.

The CCP incorporates monitoring, auditing, and risk assessment processes proportionate to the size and scope of the Company's operations.

To the best of the Company's knowledge and based on a good-faith understanding of the statutory requirements, the Company declares that it is in compliance with its Comprehensive

Compliance Program and California Health & Safety Code § 119402 as of the Effective Date above.

Nevada Compliance Program Declaration

Effective Date: January 1, 2026

The Company has adopted and maintains a corporate compliance program in accordance with Nevada Revised Statutes § 639.570, 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 compliance program is designed to promote ethical conduct, support appropriate interactions with health care professionals, and ensure compliance with applicable federal and state laws.

The compliance program is overseen by a designated Compliance Officer with access to senior management and includes written standards, training, internal reporting mechanisms, and monitoring activities appropriate to the nature and scope of the Company's business.

To the best of the Company's knowledge and based on a good-faith assessment, the Company declares that it maintains an effective compliance program and is in compliance with Nevada Revised Statutes § 639.570 as of the Effective Date above.

Massachusetts Compliance Program Declaration

Effective Date: January 1, 2026

The Company has adopted and implemented a compliance program in accordance with Massachusetts regulations at 105 CMR 970.000, 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 compliance program is reasonably designed to prevent and detect violations of applicable laws and regulations governing interactions with health care practitioners and includes written policies and procedures, compliance training, monitoring and auditing activities, and mechanisms for reporting potential compliance concerns.

The compliance program is overseen by a designated Compliance Officer responsible for implementation and ongoing evaluation of the program's effectiveness.

To the best of the Company's knowledge and belief, the Company certifies that it has adopted and implemented a compliance program consistent with the requirements of 105 CMR 970.000 and is in compliance with such requirements as of the Effective Date above.

Annual Review and Availability

These declarations are publicly available and are reviewed and updated at least annually, or more frequently as required by applicable law.

Additional information regarding the Company's compliance program may be obtained by contacting the Company's Ethics & Compliance function.