



## **California Compliance Declaration**

For purposes of compliance with the requirements of California Health and Safety Code, §§ 119400 – 119402, Jaguar Health, Inc., including its subsidiaries, including Napo Pharmaceuticals, Inc. (collectively, “Jaguar”), has established, as part of its Comprehensive Compliance Program, an annual dollar limit concerning appropriate items covered by the California law (“Covered Items”) that are given or provided to individual California medical and health care professionals (“HCPs” as determined by the US Federal Open Payments Covered Recipient definitions) as part of Jaguar’s interactions with HCPs.

Jaguar has established an annual dollar limit of \$2,000 for promotional materials, or other transfers of value including items or activities that Jaguar employees may give or otherwise provide to an individual HCP. This limit is a maximum amount and not an average or goal. In most instances the amount spent on an individual HCP will be substantially less than this annual limit. This annual limit may be revised from time to time.

The annual limit excludes certain items and payments, such as, but not limited to:

- Drug samples provided to individual healthcare professionals intended for free distribution to patients.
- Payments for bona fide professional services, including speaking, advising, consulting, training or market research services, that are based on the fair market value of the services provided, and any meals or other expenses related to the provision of such services.
- Educational items provided to physicians to give to their patients to enhance patients' understanding or management of a disease state or disorder (items such as patient educational brochures, instruction sheets, and patient self-assessment tools).
- Items used to provide charity care.
- De minimis items with a retail value of less than \$10 (e.g., medical journal article reprints).

## **2025 Declaration of Compliance**

For the annual period beginning on January 1, 2024 and concluding December 31, 2024, Jaguar set an annual aggregate limit on promotional expenditures provided at \$2,000 per California HCP. Based upon our current internal monitoring process, to the best of our knowledge and belief, and based on a good faith understanding of California Health & Safety Code, §§ 119400-119402, Jaguar is in compliance with all material respects with the requirements described in California SB1765. Jaguar continuously evaluates and updates its Compliance Program as necessary and appropriate, given the changing environment.

Jaguar makes this declaration available on this website and a copy of the Compliance Program summary and this declaration may be obtained by contacting the Chief Compliance Officer by phone at 1-866-852-4827.

## **Comprehensive Compliance Program Overview**

Jaguar has developed and maintains an effective Ethics and Compliance Program, Code of Business Conduct (the “Code”), and policies and procedures (collectively, the “Compliance Program”). The “Compliance Program is based on the elements described in the Compliance Program Guidance for Pharmaceutical Manufacturers” issued by the U.S. Department of Health and Human Services’ Office of Inspector General and the PhRMA Code for Interactions with Health Care Professionals (as revised January 2022, the “PhRMA Code”).

Jaguar is committed to maintaining and operating an effective compliance and ethics program that promotes conducting business with integrity and in compliance with the laws and regulations applicable to Jaguar’s operations. The Compliance Program is designed and operated with the goal of preventing, detecting and responding to potential or actual instances of noncompliance. However, the implementation and operation of a comprehensive compliance program is not a guarantee that there will be no misconduct.

The Compliance Program is a program designed with a flexible framework for adapting to the changing environment in which Jaguar, a pharmaceutical manufacturer, operates. The Compliance Program is continually evaluated, by Jaguar’s executive team, and the Board of Directors (“Board”), to ensure that it functions to: (a) meet regulatory, legal and compliance requirements, (b) serves the purposes for which it has been designed, and (c) enables Jaguar to meet its commitment to ethical and compliant conduct.

The Compliance Program encompasses the following components:

### **Governance**

- The Chief Compliance Officer (“CCO”) is responsible for designing, implementing and overseeing the Compliance Program. The CCO reports to the Chief Executive Officer (“CEO”), has direct access to the Board, and regularly informs the CEO and the Board on the Compliance Program and any significant Compliance risks, concerns, issues or violations that may come to the attention of the CCO.

### **Written Standards**

- The U.S. Department of Health and Human Services Office of Inspector General’s “Compliance Program Guidance for Pharmaceutical Manufacturers,” released on May 5, 2003, sets forth the framework for the Compliance Program.
- The Code of Business Conduct and Ethics (the “Code”) effectively sets forth Jaguar’s commitment to conducting its business with high standards and ethical behavior. The Code is applicable to all of Jaguar’s employees. All directors, officers and employees are expected to act with integrity and in an ethical manner.
- The PhRMA Code (adopted in addition to the Code) effectively sets forth Jaguar’s commitment to legal and appropriate interactions with health care professionals. Compliance with the PhRMA Code is a condition of employment and an element in evaluating the performance of all Jaguar employees.

- Jaguar has also developed and implemented compliance policies and procedures to help ensure compliance with applicable laws and to support ethical decision-making. These policies and procedures have been developed with the intention of capturing Jaguar's commitment to compliance, effectively address Jaguar's compliance obligations, provide clarity in terms of how to conduct a given activity in a compliant manner, and account for specific areas of risk relevant to pharmaceutical companies. All Jaguar employees and representatives are required to adhere to these policies and procedures.

#### Education and Training

- Jaguar has developed and delivered, and will continue to develop and deliver, regular and effective compliance education and training programs for all Jaguar employees, including the executive team. Compliance education and training at Jaguar is and will be targeted, where necessary, by function and topic to maximize its effectiveness.

#### Internal Lines of Communication

- Jaguar has a disclosure program which encourages all Jaguar employees to engage in an open, frank and productive dialogue and has developed, and will continue to develop, vehicles and mechanisms for promoting this dialogue. Employees can raise concerns or report potential misconduct in a number of ways including through managers, the Human Resources Department, the Compliance Officer, or Jaguar's third-party operated hotline (1-866-852-4827). The hotline allows Jaguar employees to make anonymous compliance inquiries, or anonymously report compliance concerns or potential violations. The disclosure program is publicized and conducted in a manner that emphasizes a strict non-retaliation and non-retaliation policy.

#### Monitoring and Auditing

- The Compliance Program includes monitoring and auditing activities to assess whether policies and procedures which address compliance risk areas have been implemented and communicated and are being followed. The results of monitoring and auditing activities are considered in adapting and improving existing compliance policies, procedures and training.

#### Responding to Potential Violations

- Jaguar promptly responds to all alleged compliance violations, by conducting a thorough investigation of the alleged violation, and taking appropriate corrective and/or disciplinary action for established violations and identifying potential preventative measures to help prevent the recurrence of similar violations. Corrective actions include: (a) identifying and addressing in timely fashion any gaps in policies, practices, training or understanding that may have contributed to a violation; (b) imposing a range of appropriate disciplinary measures, up to and including termination from employment and contract termination; and (c) when appropriate, reporting the violation to the appropriate government authorities when warranted.