

**ANTARES PHARMA, INC.**  
**CORPORATE COMPLIANCE PROGRAM**

**Effective January 31, 2020**

*A Message from the Chief Executive Officer and President*

Dear Colleague:

As part of our commitment to deliver value to patients using our products, we at Antares Pharma, Inc. are committed to the highest standards of business ethics throughout all levels of the organization and between it and all of its customers, suppliers, stockholders and others. To that end, the Board of Directors adopted a code of conduct and Antares implemented a Corporate Compliance Program to further its longstanding goal of providing effective governance of Antares' business for the long-term benefit of its patients and stockholders.

Our Corporate Compliance Program is designed to augment the Code of Business Conduct and Ethics and other company policies, which all employees and agents must follow. It contains the fundamental legal, regulatory and ethical guidelines for conducting business at Antares. In addition, it summarizes our compliance operational structure and policies and serves as a resource for all of our employees and agents.

With your help, we can achieve our business objectives, while maintaining the highest levels of compliance as an ethical combination drug device company. Please carefully read this Corporate Compliance Program and direct any questions you may have to Peter J. Graham, our Chief Compliance Officer.

Sincerely,



Robert F. Apple  
Chief Executive Officer, President and Director  
Antares Pharma, Inc.

**Antares Pharma, Inc.**  
**Corporate Compliance Program**  
**Effective – January 31, 2020**

**MISSION STATEMENT**

The Corporate Compliance Program (“Corporate Compliance Program”) has been designed to ensure that all Antares Pharma, Inc. (“Antares” or “our”) employees and agents conduct business in adherence with all applicable laws, rules and regulations, and in a manner that is consistent with our Code of Business Conduct and Ethics (“Code of Conduct”). Doing so necessitates the implementation of policies and procedures to address potential compliance risk areas and the development of identifiable mechanisms for reporting, investigating, auditing and monitoring potential instances of non-compliance and effectively executing required corrective actions.

Antares has developed an integrated company-wide Corporate Compliance Program designed to promote accountability for legal and ethical responsibilities across all functional areas of Antares, including Finance, Legal, Human Resources, Regulatory, Quality, Clinical, Research and Development, Business Development, Operations, Manufacturing, Commercial and Marketing. In addition, the Corporate Compliance Program is intended to address the elements of an effective compliance program in accordance with the “Compliance Program Guidance for Pharmaceutical Manufacturers” developed by the United States Department of Health and Human Services, Office of Inspector General.

The Corporate Compliance Program is led by the Chief Compliance Officer and other representatives from various functional areas, who participate as members of the Corporate Compliance Committee (“CCC”).

**I. LEADERSHIP AND STRUCTURE**

**A. Chief Compliance Officer**

The Corporate Compliance Program operates under the direction of the Chief Compliance Officer. The Chief Compliance Officer has primary responsibility for implementation and oversight of the Corporate Compliance Program and chairs the CCC. The Chief Compliance Officer and the CCC shall designate individuals to assist with the implementation of the Corporate Compliance Program. Other responsibilities of the Chief Compliance Officer include:

- Making revisions to the Corporate Compliance Program in light of any regulatory, legal or organizational changes requiring such revisions;
- In conjunction with the CCC, assessing, on an ongoing basis, and reporting on the current state of Antares’ compliance status and potential risks;
- Ensuring that policies and procedures that address areas of potential compliance risk within Antares are adequately established and implemented;

- Developing open communication with employees and agents with respect to compliance issues;
- Overseeing internal investigations and any corresponding corrective actions; and
- Directing, monitoring and auditing efforts to ensure compliance with laws, regulations and policies.

## **B. Corporate Compliance Committee (CCC)**

The purpose of the CCC is to assess, on an ongoing basis, the current state of Antares' compliance status and potential risks and to work with the Chief Compliance Officer in the implementation and oversight of the Corporate Compliance Program to ensure that it effectively prevents and/or timely detects violations of applicable laws or regulations.

The CCC shall operate consistent with the Charter of the Corporate Compliance Committee and shall, among other things, convene on at least an annual basis to update and review compliance issues. The CCC is composed of senior representatives from various functions and disciplines within Antares.

## **II. WRITTEN STANDARDS**

Antares' Code of Conduct to which all employees and agents of Antares must adhere provides the underlying principles to help ensure that we conduct our business affairs in full compliance with applicable laws, rules and regulations.

In addition, all employees and agents are required to familiarize themselves with and adhere to all Antares standards, policies and procedures that apply in the individual areas within the scope of their work responsibilities, including, but not limited to: the Code for Interactions with Health Care Professionals, the Foreign Corrupt Practices Act Compliance Policy and the Insider Trading Policy.

Electronic versions of policies falling under the Corporate Compliance Program are available to employees on the Y: drive.

## **III. EDUCATION AND TRAINING**

An effective education and training program is an integral part of the Corporate Compliance Program. Employees are required to participate in compliance-related training designated by the Chief Compliance Officer, the Legal Department, Human Resources, Quality or other functions or disciplines within the organization. Our compliance education and training programs are designed with the following objectives:

- To promote knowledge of and compliance with corporate policies and procedures and relevant federal, state and local laws and regulations;
- To encourage a culture of compliance within the organization and to ensure that employees understand their role in the compliance process; and

- To communicate industry standards and governmental requirements to employees and provide a means for the quick identification and resolution of compliance issues.

#### **IV. INTERNAL LINES OF COMMUNICATION**

##### **A. Compliance Questions and Reporting**

All employees and agents are required to report any violations or suspected violations of laws, rules, policies, regulations, the Code of Conduct or this Corporate Compliance Program. Compliance related situations may involve concerns about conflicts of interest, ethical concerns, violations or suspected violations of laws, rules, policies, regulations, the Code of Conduct, or this Corporate Compliance Program. A failure to report a known or suspected violation of the Corporate Compliance Program or the Code of Conduct is a violation in itself.

You are encouraged to raise those concerns by submitting them in the form of a complaint to [corporate.compliance@antarespharma.com](mailto:corporate.compliance@antarespharma.com) or (609) 359-3031, which will be monitored by the Chief Compliance Officer or a designee. To facilitate the investigation of a complaint, the complaint should include contact information for the complainant. Antares will use its best efforts to maintain the confidentiality of the complainant, subject to compliance with law and regulation and the best interests of Antares, but cannot guarantee it.

Alternatively, to submit a complaint on a confidential, anonymous basis to Antares' Audit Committee of the Board of Directors (the "Audit Committee"), send it in a sealed envelope marked clearly as "confidential" to the Chair of the Audit Committee at Antares' principal address (as indicated in Antares' website at [www.antarespharma.com](http://www.antarespharma.com)). In addition, Antares has established a "Whistleblower Hotline" through an outside reporting firm. The phone number for this hotline is 1-213-787-4142. This hotline can also be used for submitting a complaint on a confidential, anonymous basis. Complaints also can be submitted to the hotline via email at [whistle@fulcruminquiry.com](mailto:whistle@fulcruminquiry.com) or via mail to:

Fulcrum Financial Inquiry LLP  
Whistleblower Department  
1000 Wilshire Boulevard, Suite 1650  
Los Angeles, CA 90017

A director, officer or employee submitting a complaint on a confidential, anonymous basis is not required to include contact information, but should be aware that the nature of the concerns may lead to the identification of that person as the source of the complaint.

##### **B. Non-Retaliation Policy**

Every employee and agent has the responsibility to report to Antares through the channels identified above any suspected violation of law or policy by another employee or agent of Antares. Employees and agents, who make a good faith report about compliance issues or suspected misconduct, including violations of the Code of Conduct, can do so without fear of retribution or retaliation. Any employee who threatens or retaliates against any person who has reported a compliance concern in good faith shall be subject to disciplinary action up to and including termination.

## **V. AUDITING AND MONITORING**

A key aspect to the Corporate Compliance Program is periodic monitoring and auditing of employee and agent compliance with policies and procedures to assess whether elements of the Corporate Compliance Program have been satisfied.

For example, assessments may include whether, for a defined risk area, standards have been developed and are updated annually, dissemination and training around these standards have been conducted, a mechanism for determining adherence to these standards is in place, an investigation into alleged misconduct has commenced and appropriate corrective action, if any, has been taken.

The monitoring and auditing functions are reasonably designed to detect violations by an organization's employees or agents. The nature of Antares' reviews as well as the extent and frequency of our compliance monitoring and auditing varies according to a variety of factors, including new regulatory requirements, changes in business practices and other considerations.

Unless otherwise specified, records pertaining to the implementation and maintenance of the Corporate Compliance Program shall be maintained in the Legal Department, Corporate Compliance Program files. In some cases, training records and other compliance documents will be maintained within the specific compliance function or discipline (e.g., GMP, GCP, GLP and OSHA), within Antares' quality systems or within the Human Resources Department (e.g., policy acknowledgement forms).

## **VI. RESPONDING TO POTENTIAL VIOLATIONS**

A critical attribute of our Corporate Compliance Program is to ensure that effective and timely steps are taken to respond to policy violations and to implement corrective action designed to prevent further violations. Antares fosters a culture in which problems and concerns relating to compliance are brought to light, addressed and remedied.

An additional role of the Chief Compliance Officer, or a designee, is to oversee the review of non-compliance reports and determine whether further investigation is necessary. When deemed necessary, the Chief Compliance Officer, or a designee, will conduct an investigation into potentially non-compliant activity to determine whether a violation of Antares' directives and guidelines has occurred. Employees and agents are expected to cooperate in the investigation of reported violations. Employees and agents should be aware that the Chief Compliance Officer, General Counsel's Office and those assisting the Chief Compliance Officer and General Counsel's office are obligated to act in the best interests of Antares, and do not act as personal representatives or lawyers for employees or agents. As necessary to evaluate a report, audit findings, or to undertake further investigation, the Chief Compliance Officer may request the assistance of outside experts or legal counsel.

## **VII. CORRECTIVE ACTION PROCEDURES**

Adherence to the Corporate Compliance Program, including the Code of Conduct and all other appropriate policies of Antares, is a condition of employment at Antares. Any violation of

an employee's obligations under the Corporate Compliance Program, Code of Conduct or such other policies can subject an employee to serious disciplinary measures, including possible termination of employment. An employee's obligations include strict observance of all laws and regulations applicable to our Antares (e.g., laws and regulations governing the manufacturing and sale of pharmaceutical and medical device products, including the United States Federal Food, Drug and Cosmetic Act, as amended, and laws and regulations related to Federal health care programs), ethical standards, and applicable Antares policies and procedures. Although each situation is considered on a case-by-case basis, Antares undertakes significant efforts to ensure consistent and appropriate disciplinary action is taken in response to violations.

The Chief Compliance Officer will oversee the implementation of corrective measures in response to non-compliance with Antares' directives and guidelines. Corrective measures take into account the findings of reviews of non-compliance, and may include appropriate and consistent disciplinary action regardless of the individual's position within the organization (up to and including termination), assessing whether enhancements should be made to our policies, practices, training, or internal controls, and taking action to prevent future non-compliance.

## **VIII. REPORTING**

The Chief Compliance Officer provides annual and more frequent, as needed, substantive compliance updates to the Chief Executive Officer. On an annual basis, the Chief Compliance Officer shall provide a compliance report to the Audit Committee of the Board of Directors of Antares (the "Audit Committee"), which shall detail any findings of non-compliance with the Corporate Compliance Program and/or the Code of Conduct. In addition, in the event the Chief Compliance Officer determines there was significant and material non-compliance with the Corporate Compliance Program and/or the Code of Conduct, or another significant and material compliance related risk to Antares (such as a product recall, etc.), then the Chief Compliance Officer may report such event to the Chief Executive Officer and the Audit Committee as soon as practicable.

## **VIII. CLOSING**

Antares is dedicated to the maintenance and ongoing assessment required of an effective Corporate Compliance Program. Questions regarding Antares' comprehensive Corporate Compliance Program or Code of Conduct can be directed to the Chief Compliance Officer at [corporate.compliance@antarespharma.com](mailto:corporate.compliance@antarespharma.com) or (609) 359-3031. Copies of this Corporate Compliance Program may be obtained upon request by contacting [corporate.compliance@antarespharma.com](mailto:corporate.compliance@antarespharma.com) or (609) 359-3031.