COMPREHENSIVE HEALTHCARE COMPLIANCE PROGRAM & DECLARATION OF COMPLIANCE

INTRODUCTION

Coherus Oncology, Inc. (“Coherus”) is committed to establish and maintain a comprehensive and effective healthcare compliance program (“Healthcare Compliance Program”) that promotes ethical conduct in accordance with California Health and Safety Code §§ 119400-119402, Connecticut Compliance Program Law Conn. Stat. Chapt. 417 § 21a-70e, Nevada Revised Statute 639.570, Massachusetts General Laws ch. 111N, § 4, the Office of Inspector General, U.S. Department of Health and Human Services, “Compliance Program Guidance for Pharmaceutical Manufacturers” (OIG Guidance), and Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals (the "PhRMA Code").

The purpose of the Healthcare Compliance Program is to prevent and detect violations of law or Coherus policy. As acknowledged by the OIG Guidance, implementing a Healthcare Compliance Program may not eliminate improper employee conduct in its entirety. Nevertheless, Coherus expects all employees, executive officers and directors to comply with applicable laws and regulations, the Coherus Oncology, Inc. Code of Business Conduct and Ethics ("Code of Conduct”), and the policies and procedures established in support of the Code of Conduct. If Coherus becomes aware of violations of law or Coherus policy, we will investigate the matter and, if appropriate, take disciplinary action and implement corrective measures to prevent future violations.

HEALTHCARE COMPLIANCE PROGRAM OVERVIEW

1. Leadership and Structure

- Compliance Officer. Coherus has appointed a Chief Compliance Officer, who is charged with establishing, operating and monitoring the Healthcare Compliance Program. The Chief Compliance Officer has direct access to the Coherus Board of Directors and is a member of senior management. The Chief Compliance Officer will provide periodic reports on the status of the Healthcare Compliance Program to the Coherus Healthcare Compliance Committee and the Coherus Board of Directors.

- Compliance Committee. Coherus has appointed a Healthcare Compliance Committee to advise and assist in the implementation of the Healthcare Compliance Program. The Healthcare Compliance Committee is comprised of senior management from functional units across the company. It meets on a reoccurring basis to assess the compliance program and identify areas for enhancement.

2. Written Standards

Coherus has established written policies and procedures to ensure compliance with the OIG Guidance and PhRMA Code, including the Code of Business Conduct, Interactions with Healthcare Professionals policy and other complimentary policies and procedures that outline our commitment to compliance and corporate accountability. The standards set forth in these policies apply to all Coherus employees, and adherence to company policies is a condition of employment.

3. Education and Training

All employees are required to receive Healthcare Compliance training applicable to their job function and responsibilities, which includes both initial and refresher training on the Healthcare Compliance Program and Coherus policies. In addition, further specialized training may be provided where a need for additional training has been identified. Annual Healthcare Compliance training is required of all employees who engage in, or support, commercial activities.

4. Internal Lines of Communication

Coherus is committed to open dialogue between management and employees. Our goal is to foster a "speak up" culture where employees may ask questions or report potential instances of inappropriate activity without fear of retribution. We have established a toll-free Compliance Hotline, +1-833-718-4742 to report known or suspected violations of Coherus policies. Anonymous reports can be submitted to the hotline.

5. Auditing and Monitoring

Coherus recognizes that an auditing and monitoring plan is critical to maintaining the effectiveness of a Healthcare Compliance Program. The subject of our auditing and monitoring assessments, as well as the extent and frequency of our reviews, may vary according to a variety of factors, including new regulatory requirements, changes in business practices, and other considerations. As appropriate, auditing and monitoring results will be reported to the Legal department, the Healthcare Compliance Committee, and senior management in order to help guide the Coherus risk-assessment process.

6. Responding to Potential Violations

The purpose of our Healthcare Compliance Program is to prevent and detect violations of law or company policy. As the OIG Guidance recognizes, however, the implementation of such a program cannot guarantee that improper employee conduct will be entirely eliminated.

Nonetheless, Coherus expects that employees will comply with the Coherus Healthcare Compliance Program, and the policies established in support of such program. In the event that Coherus becomes aware of violations of law or company policy, the Legal department will promptly manage the investigation of the matter and, where appropriate, take disciplinary action

and implement corrective measures to address potential policy gaps and prevent future violations. When appropriate, a compliance report may be provided to the relevant authorities.
Employees who violate company policies and procedures and/or applicable state and federal laws may be subject to disciplinary action, up to and including termination, as determined on a case-by-case basis.

7. Corrective Action Procedures

A key element of the Healthcare Compliance Program is to provide clear disciplinary policies that set out the consequences of violating the law or company policy. After investigation of a reported or detected issue, the company will assess whether disciplinary action is appropriate, and whether a violation is in part due to gaps in our policies, practices, training or internal controls, and take action to prevent future violations.

STATEMENT OF ANNUAL AGGREGATE LIMIT

California Health and Safety Code §§ 119400, 119402 requires pharmaceutical companies to adopt a Comprehensive Compliance Program that imposes an annual aggregate dollar limit on gifts and expenditures provided to medical and healthcare professionals ("HCPs"). In accordance with the requirements of California's law, Coherus has determined an annual aggregate limit on gifts, promotional materials, and items or activities that may be provided to HCPs within California. In setting the aggregate annual limit, Coherus has taken into account the development stage of the company and the size and scope of its product portfolio. As the size of the company and product portfolio changes, Coherus may revise its annual aggregate limit.

It is important to note that Coherus' annual aggregate limit represents a maximum limit and is not a spending goal. In tracking expenditures, Coherus excludes from its annual aggregate limit the following items that are exempt under California law: (1) drug samples given to HCPs for the free distribution to patients; (2) financial support for continuing medical education forums; (3) financial support for health educational scholarships; and (4) payments made at fair market value for legitimate professional services provided by HCPs.

For purposes of making its declarations under California law, Coherus applies its annual aggregate limit to expenses incurred during the calendar year (January 1st through December 31st of each year).

DECLARATION OF COMPLIANCE

Coherus declares, in good faith, that as of July 2026, it is in substantial compliance with its Comprehensive Healthcare Compliance Program, which incorporates the principles articulated in the OIG Guidance and the PhRMA Code, and the requirements of California Health and Safety Code §§ 119400-119402. Our declaration is based upon an analysis of information available as of

the date of this declaration. While we cannot completely eliminate the possibility that an individual employee will violate these standards, our Comprehensive Healthcare Compliance Program is designed to prevent, detect, and address violations of state and federal laws as well as our own internal policies and procedures. As appropriate and in accordance with the law, Coherus will amend and update its policies and procedures and this Declaration as necessary to assure compliance. This Declaration is effective as of July 2026.

CONTACT INFORMATION

For a copy of this Healthcare Compliance Program policy, please call the Coherus toll-free Compliance Hotline at +1-833-718-4742.