

**ANI PHARMACEUTICALS, INC.**  
**PROCEDURES FOR HANDLING COMPLAINTS REGARDING ACCOUNTING,  
INTERNAL ACCOUNTING CONTROLS OR AUDITING MATTERS**

As part of its commitment to ethical business conduct, ANI Pharmaceuticals, Inc. (“ANI”) has established and maintains procedures for: (1) the receipt, retention, and treatment of complaints received by ANI regarding accounting, internal accounting controls, or auditing matters; and (2) the submission by officers, employees and others acting on behalf of ANI (“Covered Persons”), on a confidential and anonymous basis, of concerns regarding questionable accounting or auditing matters.

Under these procedures, Covered Persons are encouraged to report any issues or concerns they may have regarding questionable accounting, internal accounting controls or auditing matters, such as:

- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of ANI;
- Fraud or deliberate error in the recording and maintaining of ANI’s financial records;
- Deficiencies in or noncompliance with ANI’s internal accounting or disclosure controls;
- Misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in ANI’s financial records, financial reports or audit reports; or
- Deviation from full and fair reporting of ANI’s financial condition.

Covered Persons are also urged to report:

- Conduct that may result in a violation of laws, rules or regulations applicable to ANI or its employees;
- Unethical or illegal business conduct, including any violation of ANI’s Code of Ethics;
- Any information that the Covered Person has knowledge of concerning (a) significant deficiencies and material weaknesses in the design or operation of ANI’s disclosure controls and procedures and internal control over financial reporting or (b) any fraud, whether or not material, that involves any employee, officer or director of ANI; or
- Any matter that may pose a specific and substantial danger to the health and safety of ANI employees or the public.

If any employee, officer or other person acting on behalf of ANI believes, is aware or has evidence that any activity of the type noted above has occurred, is occurring or may occur, ANI’s policy is that the Covered Person should promptly report such activities. Reporting promptly on these matters will greatly facilitate ANI’s ability to address any potential issues, reinforce the culture of compliance that ANI seeks to maintain and allow ANI to prevent or mitigate any wrongdoing or harm to ANI or its employees, shareholders and other constituents.

Complaints or concerns regarding accounting, internal accounting controls or auditing matters may be reported anonymously to the Chair of the Audit and Finance Committee of the Board of Directors of ANI. Employees or other Covered Persons nonetheless are encouraged to provide their names to facilitate investigation and follow-up. To the extent legally permitted, all complaints and concerns will be treated confidentially and the identity of the reporting person will be kept confidential unless the reporting person otherwise agrees and except as necessary to conduct an adequate investigation or compelled by judicial or other legal process.

An employee or other Covered Person may report complaints or concerns to their immediate supervisor, to ANI's Compliance Officer or to the Chair of ANI's Audit and Finance Committee.

Reports to ANI's Compliance Officer, Stephen P. Carey, may be made in one of three ways:

- In writing, marked "Confidential" and addressed to: Stephen P. Carey, Compliance Officer, ANI Pharmaceuticals, Inc., 11100 Wayzata Blvd, Minnetonka, MN 55305.
- By phone, at (218) 634-3500, extension 3799. Any messages left will be accessible only to the Compliance Officer.
- By email to [Compliance.Officer@anipharmaceuticals.com](mailto:Compliance.Officer@anipharmaceuticals.com).

Reports to the Chair of ANI's Audit and Finance Committee may be made in one of three ways:

- In writing marked "Confidential" and addressed to: Chair, Audit and Finance Committee, ANI Pharmaceuticals, Inc., 210 Main Street West, Baudette, MN 56623.
- By phone at (302) 482-4425. Any messages left will be accessible only to the Chair of the Audit and Finance Committee. This is not an anonymous hotline.
- By email to the Chair of the Audit and Finance Committee at [Audit.Chair@anipharmaceuticals.com](mailto:Audit.Chair@anipharmaceuticals.com).

Upon receipt of a complaint, the Chair of the Audit and Finance Committee will determine whether a reasonable basis exists for commencing an investigation into the complaint. The Chair of the Audit and Finance Committee also will decide what, if any, remedial actions should be taken as a result of a complaint. If the complaint is addressed to the reporting person's immediate supervisor, the supervisor must forward the complaint to ANI's Compliance Officer, together with any facts and recommendations to assist the Compliance Officer in addressing the complaint. ANI's Compliance Officer must immediately forward to the Chair of the Audit and Finance Committee any complaints relating to questionable accounting or auditing matters and received directly or through a reporting person's supervisor. For all other complaints received by ANI's Compliance Officer, the officer will determine whether a reasonable basis exists for commencing an investigation into the complaint and will decide what, if any, remedial actions should be taken as a result. ANI's Compliance Officer will report any such complaints and the resolution thereof, if any, to the Audit and Finance Committee on at least a quarterly basis or more frequently as requested by the Chair of the Audit and Finance Committee.

ANI strictly prohibits retaliation, harassment or discrimination of any kind against anyone who makes a report in good faith or who assists in an investigation relating to any such report. Accordingly, in implementing these procedures, ANI will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of a complaint in accordance with the terms of these procedures. Anyone who engages in such retaliation - directly or indirectly - may be disciplined, up to and including discharge and demotion, to the extent determined appropriate by ANI and permitted by applicable law.

Stephen P. Carey  
Vice President, Finance and Chief Financial Officer  
(Compliance Officer)  
[stephen.carey@anipharma.com](mailto:stephen.carey@anipharma.com)