



MELINTA THERAPEUTICS, INC. CORPORATE COMPLIANCE PROGRAM

Melinta Therapeutics, Inc. (NASDAQ: MLNT) is a commercial-stage company discovering, developing and commercializing novel antibiotics to treat serious bacterial infections. Melinta strives to conduct all aspects of its business in accordance with the highest standards of business ethics and to comply with the laws and regulations that govern our industry.

As part of this effort, Melinta has adopted an enterprise-wide Comprehensive Compliance Program (“CCP”) that is designed to prevent, detect, and resolve potential compliance issues. Our CCP seeks to comply with all applicable federal and state laws, regulations, and industry guidance including the “Compliance Program Guidance for Pharmaceutical Manufacturers” developed by the United States Department of Health and Human Services Office of the Inspector General, and the Pharmaceutical Research and Manufacturers of America’s “Code on Interactions with Healthcare Professionals.” Our CCP applies to the Company’s officers, directors and employees in their conduct of Melinta’s business activities, including the activities of any of its subsidiaries or divisions.

Oversight

Our Melinta Chief Compliance Officer reports to the Company’s President and Chief Executive Officer, and has primary responsibility for development and implementation of the CCP, including drafting policies and procedures, training, auditing, monitoring and performing investigations. The Chief Compliance Officer provides periodic reports on the operation of the CCP to the Company’s Executive Compliance Committee and the Audit Committee of the Melinta Board of Directors, the body with ultimate authority over the Melinta CCP.

Written Standards

The Melinta Code of Conduct (“Code”) is our declaration of ethical and compliance principles that guide our ongoing business operations. It states our expectation that the company’s officers, directors and employees will act in accordance with the law and company policy. The Company conducts periodic review of our Code to ensure its continued relevance to its business activities.

Melinta has also adopted a series of compliance policies and procedures to address specific areas of compliance risk applicable to Melinta and the pharmaceutical industry.

Annual Spending Limit

To ensure that they understand our products, Melinta representatives may meet with healthcare professionals (“HCPs”) to explain their benefits and risks. Some of these informational and educational presentations may take place over the course of a modest meal to minimize the HCP’s time away from his or her patients. In addition to occasional meals, Melinta may provide healthcare-practice related items in accordance with federal and state laws, regulations, guidance, and our CCP. For purposes of complying with the California Health and Safety Code 119402, Melinta has established a maximum annual aggregate limit of \$3500 for gifts (defined as anything of value provided for free, including meals) given to California health care professionals. This limit is a cap, not a goal or average; the amount spent on most health care professionals will be substantially less.



Education and Training

Education is a key element of the Melinta CCP. Melinta is committed to implementing programs that effectively train its employees on company policies and procedures. New employees receive such instruction as part of their initial training and existing employees are expected to receive compliance training on at least an annual basis. Melinta will review and update its training programs periodically and continue to identify additional areas where training is needed on an ongoing basis.

Communication

Melinta expects its employees, officers and directors to promptly report suspected or actual violations of our CCP and laws and regulations governing our business. Melinta encourages reports to be made to a supervisor, manager, or directly to the Chief Compliance Officer or member of the Corporate Compliance department. Melinta also maintains a hotline that allows for anonymous reporting of any compliance concerns and a process for investigating and documenting those concerns. Reports can be made to the Melinta Ethics & Compliance Hotline online at www.Melinta.ethicspoint.com, or toll-free by telephone at 1-855-433-9925.

Auditing and Monitoring

As part of the CCP, Melinta conducts auditing and monitoring activities designed to assess compliance with the CCP policies, procedures and processes, identify potential training needs, and identify policy, procedure or process needs.

Responding to Potential Violations

Melinta is committed to compliance and strives to maintain an active and effective CCP. Disciplinary actions for compliance program violations are addressed in the Melinta Code of Conduct. Melinta has a progressive disciplinary process up to and including termination of employment depending upon the severity of the violation. Disciplinary actions will be timely implemented to ensure that the incident is resolved and to prevent any potential reoccurrence.

Melinta Pharmaceuticals, Inc. Compliance Program Declaration

Melinta declares that, as part of our continued focus on compliance, we have developed a Comprehensive Compliance Program that, to the best of our knowledge and as of the date of this declaration, is compliant with the requirements of California Health & Safety Code §§ 119400-119402, and Melinta is in all material respects compliant with its CCP.

Copies of this declaration may be obtained by contacting Compliance@melinta.com.

Updated October 1, 2018