



Annual Declaration of Compliance with California Law

AVEO Pharmaceuticals, Inc. (“AVEO” or the “Company”) is committed to ensuring that its business practices are conducted in an ethical and transparent manner and in compliance with all applicable laws, including the California Health and Safety Code §119400-119402 (the “California Code”). The California Code requires pharmaceutical companies to adopt a Comprehensive Compliance Program that is in accordance with the Compliance Program Guidance for Pharmaceutical Manufacturers published by the U.S. Department of Health and Human Services Office of Inspector General in April 2003 (“OIG Guidance”).

AVEO has developed a Comprehensive Compliance Program in accordance with OIG Guidance. As part of this Comprehensive Compliance Program, Company employees dedicated to our pharmaceutical business are governed by policies consistent with the Pharmaceutical Research and Manufacturers of America (“PhRMA”) Code on Interactions with Health Care Professionals. AVEO is committed to developing and providing effective compliance training for all employees on these policies as well as pertinent federal and state standards.

AVEO’s Comprehensive Compliance Program includes a corporate Code of Business Conduct and Ethics that all employees must read, acknowledge understanding of, and certify to. AVEO has also established internal lines of communication and requires all employees to report instances of noncompliance with the Code of Business Conduct and Ethics or Company policies. AVEO provides an ethics hotline that allows for anonymous reporting of compliance violations (1-844-989-2843).

Annual Spending Limit

The California Code also requires pharmaceutical and medical device companies to adopt a specific annual dollar limit on gifts, promotional materials, or items or activities that a company may give or otherwise provide to an individual medical or healthcare professional (“HCP”) in accordance with OIG Guidance and PhRMA Code. AVEO has established an annual aggregate dollar limit of \$1,800.00 for promotional materials or items or activities that the Company may give or otherwise provide to a California HCP pursuant to the requirements of Cal. Health & Safety Code § 119402 (S.B. 1765). This dollar limit may be revised from time to time. This dollar limit is a maximum only and does not necessarily represent a typical, average, usual, or customary amount. This dollar limit does not include the following types of expenditures:

- Prescription drug samples given to HCPs intended for free distribution to patients;
- Financial support independent education, including continuing medical education forums; and/or

- Payments for legitimate professional services, including professional speaking, advising, consulting, training, or market research services, which are based on the fair market value of the services provided.

Compliance Declaration

To the best of our knowledge as of the date of this declaration, AVEO is in compliance with our Comprehensive Compliance Program, as described here, and with California Health & Safety Code sections 119400-119402.

By making this declaration, AVEO is not declaring that in all circumstances it can prevent individual employees from conduct that deviates from its policies. To the extent that any deviations are identified, AVEO is committed to taking necessary and appropriate corrective actions. AVEO expects employees to comply with the AVEO Code of Business Conduct and Ethics and its comprehensive compliance program, and makes good faith efforts to enforce its provisions, prevent violations, and address inappropriate conduct that may occur.

To request a copy of this declaration, please call 1-857-400-0101.