



REGULATION FD CORPORATE COMMUNICATIONS POLICY

Effective Date: March 11, 2025

PURPOSE

Achieve Life Sciences, Inc. ("Achieve" or the "Company") is committed to the fair disclosure of information about the Company without advantage to any particular analyst or investor, consistent with Regulation FD promulgated under the Securities Exchange Act of 1934, as amended.

NO SELECTIVE DISCLOSURE

Selective disclosure of material non-public information is against the Company's policy. If the Company discloses material non-public information, it shall strive to do so in a manner calculated to result in simultaneous, widespread dissemination to the public. Please refer to the Company's Insider Trading Policy for examples of material non-public information.

If the Company discovers verifiable facts indicating that material non-public information has been disclosed other than through simultaneous widespread dissemination, it shall promptly disclose the same information in a manner calculated to result in timely, widespread dissemination of such information. If an unintended release of material non-public information occurs, the Company shall promptly disclose the same information or similar information to the public in compliance with then-applicable law.

PUBLIC DISCLOSURE MECHANISMS

The Company will disclose information in a way that ensures widespread public disclosure. The methods used to ensure information is widely disseminated may include, but are not necessarily limited to, the following: issuing a widely disseminated press release, filing or furnishing a Current Report on Form 8-K with the Securities and Exchange Commission ("SEC") or including the information in another document filed with the SEC, such as a quarterly report on Form 10-Q or annual report on Form 10-K, or providing the information via a webcast or conference call that provides broad, non-exclusionary distribution of the information to the public and for which adequate advance public notice has been given. The Company will use well-established methods of distribution or combinations thereof to ensure widespread dissemination of the information to the public.

AUTHORIZED COMMUNICATIONS

Persons authorized to make public disclosures of information about the Company are limited to our Chief Executive Officer, the Chairperson of our Board, our Chief Financial Officer and the head of investor relations (each an "Authorized Spokesperson"). Other employees of the Company may make public disclosures of information about the Company, but only when given express permission by an Authorized Spokesperson.

All inquiries from investors, financial analysts, research firms, investment professionals and the financial community should be directed to an Authorized Spokesperson of the Company. Any inquiries

related to the stock or to financial or investment information should also be directed to an Authorized Spokesperson.

Appropriate training will be provided to each Authorized Spokesperson on compliance with this policy, review of public statements regarding material information and procedures for disclosing non-public information.

EARNINGS AND GUIDANCE

The Company will allow the public to listen via telephone or webcast to quarterly conference calls and to additional open analyst conference calls where it may disclose material non-public information. In addition, notification of the conference call will generally be made approximately one to two weeks prior to the call via a Company press release. A playback of the call will also be available for a reasonable period of time from the investor relations section of the Company's website.

Generally, at least 72 hours before a scheduled analyst conference call, the Company shall issue a press release which provides (a) the date and time of the scheduled call and (b) the specific information needed for a member of the public to dial in or access the call over the Internet. Should situations arise requiring interim conference calls or other public disclosure, notice will be provided as soon as possible.

The Company generally will not confirm or deny any Company guidance after the date upon which such guidance was provided. Instead, if asked what a given period's guidance is, the Company may refer the inquiring party back to the most recent quarterly conference call or financial press release providing such guidance, emphasizing that such guidance was provided as of such prior date only and is not being confirmed, denied or updated. The Company shall not comment on any third party's forecasts of or expectations for the Company's financial performance.

BLACKOUT AND QUIET PERIOD

In addition to any event-specific blackout periods, the Company will observe a quarterly blackout period beginning on the last day of the last month of the Company's fiscal quarter and ending after the second full trading day following the Company's issuance of its quarterly earnings release. During this period, the Company will use discretion during meetings and will not comment or respond to questions related to financial results, any previously issued forward-looking guidance or other material information relevant to the Company's current or expected financial results. Comments will be limited to responding to inquiries concerning publicly available or non-material information.

PRESENTATIONS

The Company presents at investor conferences on a periodic basis. At these events, the Company will seek to broadcast the presentation on the Internet if it anticipates discussion of new information related to recent publicly disclosed material events. In the absence of recent publicly disclosed material events, the Company may choose not to broadcast the presentation. If the Company webcasts any presentations, the Company will give advance notice to the public of such webcast and generally should post a copy of such presentation on the investor relations section of the Company's website, which presentation should generally be made available to the public for a reasonable period of time following such presentation.

ONE-ON-ONE MEETINGS AND CONVERSATIONS

One-on-one meetings and conversations with investors, potential investors, financial analysts and securities market professionals are important components of the Company's on-going investor relations efforts. However, the Company will not discuss material, non-public information during these meetings or conversations. Conversations will be limited to discussions of information that has been previously disclosed, non-material information or generally known Company or industry information such as historical Company or industry information, generally identifiable industry trends or previously disclosed Company strategies or goals.

ANALYST REPORTS AND MODELS

Any review of an analyst's draft report or model will only be performed by an Authorized Spokesperson. Comments related to the draft will be limited to correcting errors of historical facts, pointing out already public information or providing non-material information. Analysts must independently formulate their estimates of the Company's future performance or stock price. The Authorized Spokesperson will not disclose the Company's material internal projections, estimates or predictions to third parties, including analysts, unless it discloses such information publicly.

ONLINE FORUMS

No director, officer or employee of the Company may participate, in any manner other than passive observation, in any investment or stock-related Internet "chat" rooms, blogs, message boards, social media sites or other similar online forums relating to the Company without the prior approval of an Authorized Spokesperson.

COMMENTING ON RUMORS

Generally, the Company will not confirm or deny rumors or market speculation about the Company or its business, so long as it is clear that the Company is not the source of the rumor. If asked about a rumor or market speculation, Authorized Spokespersons should state that the Company's policy is not to comment on rumors or market speculation.

INQUIRIES

All inquiries regarding, or violations of, the Corporation's Regulation FD Corporate Communications Policy should be communicated to the Company's Chief Financial Officer at CFO@achievelifesciences.com. Anyone who violates the Regulation FD Corporation Communications Policy may be subject to disciplinary measures, which may include termination of employment for cause.