

## California Compliance Declaration

NOTICE: This information is provided pursuant to the requirements of California Health & Safety Code, (Section 119402, which requires pharmaceutical companies doing business in California to make the details regarding their compliance program available, to set an annual aggregate dollar limit for California HCPs and to make an annual written declaration of compliance with the compliance program.

1. California Health and Safety Code (Sections 119400-119402, "California Compliance Law") requires pharmaceutical companies to adopt a compliance program in accordance with the OIC Guidance and policies for compliance with the PhRMA Code. R-Pharm US has implemented a comprehensive compliance program and will make appropriate updates as needed. Refer to the Corporate Governance section of [www.rpharm-us.com](http://www.rpharm-us.com) or call 844-586-8954 to obtain a detailed description.

2. The California Compliance Law also requires pharmaceutical companies to set an annual aggregate limit on certain promotional expenditures provided to a medical or healthcare professional and defined under the statute. For purposes of compliance with the requirements of the California Compliance Law and as part of its Compliance Program, R-Pharm US has established a specific annual aggregate dollar limit of \$2500 on gifts, promotional materials or items or activities that R-Pharm US may give or otherwise provide to an individual medical or healthcare professional in California. This limit represents a spending cap; it is not a goal and average, customary or a typical amount. R-Pharm US has established internal monitoring mechanisms designed to help ensure compliance with our established annual spending limit in California.

The annual limit does not include:

- Drug/device samples given to physicians and healthcare professionals.
- Payments for legitimate professional services and any meals or expenses associated with the provision of such services.
- Patient educational materials provided to patients by their physician with the purpose of educating the patient or enhancing the patient's understanding or management of the condition.

3. The California Compliance Law requires pharmaceutical companies interacting with medical or healthcare professionals in California to make an annual written declaration of the compliance with their compliance program.

R-Pharm US has developed a compliance program tailored to meet the specific needs of the company. Internal monitoring mechanisms have been implemented which are designed to measure compliance with the spending limits as set by the company for California medical and healthcare professionals. Thus, subject to the limitations described above, R-Pharm US hereby declares that to the best of the requirements of the California Compliance Law, and its established annual spending limits for the current time period. R-Pharm US will assess its Compliance Program at least annually each calendar year. R-Pharm US last assessed its Compliance Program in September, 2016.

This declaration is not intended and should not be construed to imply that R-Pharm US can prevent individual employees from engaging in conduct that would be considered improper.