

## **California Health and Safety Code §119402**

To the extent that Noven's relationships with healthcare professionals (HCPs) continue after May 2016, such relationships will continue to be intended to benefit patients and enhance the practice of medicine. Informational presentations and discussions by Noven representatives and others speaking on behalf of Noven will be intended to provide valuable scientific and educational benefits. In conjunction with such presentations and discussions, if any, Noven employees may offer occasional meals and educational items in accordance with the PhRMA Code on Interactions with Healthcare Professionals.

The California Health and Safety Code requires pharmaceutical companies to maintain a Comprehensive Compliance Program (CCP) relating to their interactions with health care professionals as provided above, and to:

- Establish "a specific annual dollar limit on gifts, promotional materials, or items or activities that the pharmaceutical company may give or otherwise provide to a health care professional";
- Make an annual written declaration that it is in compliance with its CCP and the law;
- Make its compliance program and its annual declaration of compliance available to the public on its website as is done here; and
- Provide a toll-free number to obtain a copy of the CCP and the annual written declaration. That number is 888-253-5099.

For medical or healthcare professionals in California, Noven has declared a specific annual dollar limit of \$1,500 for educational items and activities in accordance with the PhRMA Code. Noven expects that few, if any, California HCPs will approach this limit. Consistent with pharmaceutical marketing laws in other states, in-office food or beverage provided on an occasional basis for less than \$25 per HCP is not included in determining the annual dollar limit. This spending limit is set by Noven and revisited at least annually.

## **California Declaration of Compliance – May 2019**

As noted above, Noven ceased its active field sales activities as of May 2016. Noven Pharmaceuticals has established a Comprehensive Compliance Program in accordance with relevant laws and with consideration to our size, organization, and operations, with which it intends to comply insofar as it remains applicable to Noven's revised organization. However, a compliance program cannot guarantee that no violations will take place. The goal is to deter violations and to identify them as promptly as possible and then facilitate corrective actions. Since compliance is a dynamic process, Noven will continue to evaluate and assess our Comprehensive Compliance Program on an ongoing basis to adjust to new circumstances and to maintain and improve the strength of the Program.

To the best of our knowledge, as of May 2019, Noven is in material compliance with our Comprehensive Compliance Program and the requirements of the California Health & Safety Code.