



## **Declaration Under Cal. Health & Safety Code §§ 119400-119402**

IBSA Pharma Inc. (IBSA USA or Company) is committed to compliance with applicable laws, regulations and authorities including those related to the promotion, distribution and marketing of its products. In order to achieve these goals, IBSA USA has implemented a Comprehensive Compliance Program (CCP) consistent with Cal. Health & Safety Code §§ 119400-119402, based on its good faith understanding of the statutory requirements.

IBSA USA's CCP has been tailored to the unique characteristics and needs of the Company. IBSA USA's CCP contains the elements of an effective compliance program identified in the "Compliance Program Guidance for Pharmaceutical Manufacturers" published by the Office of the Inspector General, U.S. Department of Health and Human Services (HHS-OIG Guidance). In addition, IBSA USA adheres to the "Code on Interactions with Healthcare Professionals" published by the Pharmaceutical Research and Manufacturers of America (PhRMA Code) and is committed to facilitating compliance with the PhRMA Code.

In accordance with California requirements, IBSA USA has established an annual aggregate spending limit of two thousand dollars (\$2,000) per California licensed Health Care Professional (HCP) and intends to monitor activities to facilitate compliance with this spend limit.

IBSA USA declares that, to the best of its knowledge and based on a good faith understanding of the statutory requirements, it is in compliance with its CCP, including its established annual aggregate spend limit.

A copy of IBSA USA's CCP and this declaration is available to individuals who request it by calling 800-587-3513 or emailing [Info.us@ibsagroup.com](mailto:Info.us@ibsagroup.com).

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