



Almirall, LLC, October 2020

Declaration Under California Health and Safety Code §§ 119400-119402

Almirall is committed to operating ethically and in compliance with the laws and regulations of our industry. Our Code of Conduct and key policies provide guidance on the laws and regulatory requirements applicable to our business consistent with the principles of the Pharmaceutical Research and Manufacturers of America (PhRMA) Code of Interactions with Healthcare Professionals. California Health and Safety Code §§ 119400–119402 require pharmaceutical companies to set a specific annual dollar limit on gifts, promotional materials, and items or activities that pharmaceutical companies may give or otherwise provide to an individual medical or health care professional as defined under the law. Almirall has implemented a Comprehensive Compliance Program (CCP), consistent with our good faith understanding of the statutory requirements. Almirall affirms its compliance with its CCP and California Health and Safety Code §§ 119400–119402.

Almirall’s CCP is tailored to the unique characteristics and needs of the Company and its business. Although OIG Guidance recognizes that even an effective compliance program may not completely eliminate all misconduct by individuals, our CCP is designed to prevent, detect and respond to identified or reported misconduct, whether substantiated, potential or perceived. Almirall’s expectation is that its employees adhere to Federal and state legal and regulatory requirements, as well as Company policies. Our CCP is based on maintaining a company culture of ethical standards of behavior supported by the Company Leadership Team, written policies and procedures, a designated Compliance Officer responsible to oversee the compliance program, compliance education & training, internal monitoring and auditing and open lines of communication for our employees, which include a third-party-hosted hotline. Any perceived violations are reviewed to assess the facts, and disciplinary and corrective actions are implemented whenever misconduct is substantiated.

In accordance with California requirements, which stipulate that pharmaceutical companies establish annual limits on gifts, promotional materials, and other items or activities that their representatives may provide to a health care professional, Almirall has updated relevant policies to establish such limits, which may be revisited by the Company from time to time.

California Health and Safety Code § 119402 excludes from annual expenditure limits such items as drug samples provided to health care professionals for free distribution to patients, financial support for continuing medical education forums, and payments within fair market value when made to compensate a health care professional for legitimate professional services. In addition, for the purpose of this statement of compliance, Almirall does not interpret “promotional materials” to include written information intended to educate healthcare professionals about our products, provide scientific and educational information, or support medical research and education.

For more information about the Almirall, LLC Compliance Program, you may visit our website at almirall.us or contact compliance.us@almirall.com.