Compliance Declaration

NOTICE OF COMPLIANCE: the following information is provided pursuant to the requirements of California Health & Safety Code § 119402 (S.B. 1765) “The California Compliance Law.”

As part of Spectrum’s commitment to Ethical Excellence, we have developed a comprehensive Compliance Program designed to comply with all applicable international, federal, and state laws, and industry and ethical standards, included but not limited to the OIG Compliance Guidance, PhRMA Code, and the California Compliance Law. To the best of our knowledge and based on our good faith understanding of the statutory requirements of this California law, we are, in all material respects, in compliance with both its Compliance Program and Section 119402 of the California Health and Safety Code.

Section 119402 of the California Health & Safety Code (S.B. 1765) requires a pharmaceutical company to adopt a Compliance Program that is in accordance with the U.S. Department of Health and Human Services, Office of Inspector General's ("OIG") "Compliance Program Guidance for Pharmaceutical Manufacturers," and the Pharmaceutical Research and Manufacturers of America ("PhRMA") Code, to make available their program for compliance with applicable federal and state laws and industry standards regulating the marketing and promoting of their products, and their annual written declaration of compliance with such compliance program.

The Office of the Inspector General has recognized in the April 2003 Compliance Program Guidance for Pharmaceutical Manufacturers that the implementation of an effective compliance program cannot entirely eliminate the chance of improper conduct. Accordingly, while Spectrum cannot eliminate the chance of individual employees engaging in conduct that may deviate from its policies, Spectrum’s Compliance Program is reasonably designed with the goal of preventing, detecting and addressing such improper conduct.

If you would like to receive copies of this Declaration and Spectrum’s Compliance Program, you may call the Spectrum Helpline at 800-840-2983 and request printed copies.

Dated: November 10, 2016