

Comprehensive Compliance Plan

At Radius, we take seriously our obligation to act with the highest level of integrity in all that we do. The Radius compliance program was established to set the standards of how we conduct business with integrity and to communicate with employees Radius' expectations for shared values and ethical business practices.

In an effort to ensure that our employees remain abreast of and informed about Radius policies, and the laws, rules and regulations that impact and govern our business, Radius has developed this Comprehensive Compliance Plan (the Plan). In addition to providing training and education, the Plan is designed to monitor, detect, correct, and as necessary take disciplinary action, in respect of activities or practices that do not comply with the law or Radius policies and expectations. The ultimate goal of the Plan is to ensure that Radius employees have the knowledge and resources necessary to comply with these policies, laws, rules, regulations.

Radius Code of Conduct, Policies and Procedures

Radius has adopted a Code of Conduct and Business Ethics that describes the standards of business conduct and the ethical standards by which our directors, officers, employees and contractors are to adhere when acting on behalf of Radius. The Code is incorporated fully into this Comprehensive Compliance Program and is available at radiuspharm.com.

In addition, although not a member of PhRMA, Radius supports and has implemented policies and procedures that are consistent with the requirements of the PhRMA Code on Interactions with Healthcare Professionals dated July 1, 2002, as revised on January 1, 2009 as well as OIG Guidance. Radius employees are expected to comply with the Radius Code of Conduct and Business Ethics, the PhRMA Code, and any and all compliance policies and procedures applicable to their function at, and activities performed on behalf of, Radius.

Compliance Oversight

Radius has appointed a Chief Compliance Officer and has established a Compliance Committee that is chaired by the Chief Compliance Officer. The Chief Compliance Officer maintains open and effective lines of communication with other departments of the company and is responsible for overseeing implementation of the Comprehensive Compliance Program and responding promptly to compliance-related issues raised in any manner.

Compliance Training and Education

Radius is committed to developing and providing its employees with effective compliance training. All new Radius employees are trained on compliance issues, including compliance with the Code, the PhRMA Code and the options for reporting compliance-related concerns. Additional refresher training and updates covering not only the PhRMA Code but other issues are provided to employees on a regular basis.

Monitoring

To measure the efficacy of Radius's training and education program, as well as to confirm that Radius employees are acting in the expected compliant manner, Radius will periodically perform monitoring activities to evaluate compliance with company policies and applicable laws. The nature, frequency and extent of these reviews may vary according to factors such as internal risk assessments, regulatory requirements and developments, and changes in Radius's business practices.

Employee Communications

Pursuant to Radius' Reporting and Investigations Policy, employees must promptly report any violation of the Comprehensive Compliance Program or any Radius policy using any of the available company resources, including the compliance hotline and website. Employees making good faith reports are protected from retaliation.

California Health & Safety Code Sections 119400-119402 Declaration

Radius declares that to the best of its knowledge, and based upon a good faith understanding of California Health & Safety Code Sections 119400-119402 (the California Statute), Radius (1) has established a Comprehensive Compliance Program that is reasonably designed to prevent or detect and address misconduct and that encompasses the compliance program requirement set forth in the California Statute, and (2) is in compliance with its Comprehensive Compliance Program and the California Statute.

Compliance is a dynamic concept and the Radius Comprehensive Compliance Program is similarly intended to be a dynamic program designed to meet the company's evolving compliance needs. Accordingly, Radius will at least annually review and, as needed, modify its Comprehensive Compliance Program to enhance its effectiveness.

Annual Spending Limit

As part of Radius' interactions with healthcare professionals, Radius may provide meals, promotional materials, educational items or other items. Radius has adopted an annual dollar limit of \$2,000 per individual California healthcare professional for appropriate items. This limit is a maximum amount, and is neither an average nor a targeted spending limit. The annual limit may be revised from time to time as deemed appropriate by Radius.

The annual spending limit set forth in this declaration does not include the value of:

1. Drug samples given to physicians and healthcare professionals intended for free distribution to patients;
2. Financial support of independent education including continuing medical education forums;
3. Financial support for health education scholarships, and
4. Payments made for legitimate professional services provided by a healthcare

professional so long as the amount paid is based upon the fair market value of the services provided.

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