

Retrophin, Inc.
Declaration of Compliance
California Health and Safety Code §119402

Retrophin, Inc. (“Retrophin”) has adopted and implemented a Comprehensive Compliance Program. In accordance with California State Law (California Health and Safety Code §119402), Retrophin, to the best of its knowledge and belief declares that:

- The Compliance Program is in accordance with the May 5, 2003, “Compliance Program Guidance for Pharmaceutical Manufacturers”, developed by the US HHS Office of the Inspector General Guidelines (OIG Guidelines).
- The Compliance Program complies with the Code on Interactions with Health Care Professionals, (PhRMA Code) as updated January 1, 2009.
- The Compliance Program includes limits on gifts or incentives provided to medical or health professionals.

Retrophin further declares, to the best of its knowledge and belief that it is in compliance with its Comprehensive Compliance Program and with the relevant Chapter of California Health and Safety Code (i.e., Division 104, part 15, Chapter 8).

Retrophin has set an annual aggregate limit on covered promotional expenditures per covered medical or healthcare professional. The limit does not represent any usual, customary, average, or typical amount for medical or healthcare professionals.

Retrophin exempts certain expenditures from this limit based upon a good faith understanding of California Health and Safety Codes §§ 119400-119402 and the PhRMA Code. Such exemptions include

- Fair market value payments made to healthcare or medical professionals for appropriate rendered services.
- If Retrophin were to commence a drug sample program, the samples given to physicians and healthcare professionals intended for free distribution to patients
- Financial support for continuing medical education forums
- Financial support for health educational scholarships
- Documents, information, and educational materials that inform medical and healthcare professionals about Retrophin products, provide scientific and educational data, support medical research and education and enhance a patient’ understanding or management of a disease state or disorder.

Copies of the Compliance Program as well as this declaration of compliance may be obtained upon request by contacting Retrophin, Inc., at 760-260-8600.

William R. Benvenuto
Vice President, Legal Affairs & Chief Compliance Officer