

December 31, 2017

## AMARIN PHARMA, INC.'S CORPORATE-WIDE COMPLIANCE PROGRAM

### INTRODUCTION AND DECLARATION

Amarin Pharma, Inc., based in Bedminster NJ, is a biopharmaceutical company focused on commercialization and development of therapeutics to improve cardiovascular health. Committed to conducting its business in a compliant manner, Amarin has developed a Comprehensive Compliance Program including policies and training in accordance with

- the HHS–Office of Inspector General’s publication “Compliance Program Guidance for Pharmaceutical Manufacturers” and
- the PhRMA Code on Interactions with Health Care Professionals

As of December 31, 2017, based on our good faith understanding of the statutory requirements and to the best of our knowledge based upon auditing and monitoring results, Amarin is, in all material respects, in compliance with the provisions of California Health & Safety Code §§ 119400–119402 (2005) and the California Pharmaceutical Marketing Law and Amarin’s code of conduct which describes the company’s corporate compliance program including its compliance policies.

### ANNUAL LIMIT

California law requires companies to establish an annual limit on the amount it spends on gifts, promotional materials, and items or activities permitted under the OIG Guidance & PhRMA Code. Amarin policy prohibits gifts. The statute specifically excludes drug samples, financial support for CME forums, financial support for health educational scholarship, and payments for legitimate professional services including consulting. Amarin has set a maximum annual limit for spending on California healthcare professionals. This amount represents a ceiling, and is not intended as a goal or an average. In fact, Amarin anticipates that, for the majority of physicians, the amount spent will be substantially less than the annual limit. We anticipate that we will annually review and adjust this limit as our business requires. For purposes of clarity,

this annual spending limit does not include the value of: (1) drug samples given to physician and healthcare professional intended for free distribution to patients; (2) financial support of independent education including continuing medical education; (3) financial support for health education scholarships; and (4) payments for legitimate professional services, including professional speaking, advising, consulting, and research activities that are by policy based upon the fair market value of the services provided. The limit set for 2018 is \$3,000.00 per HCP.

#### **AVAILABILITY OF COMPLIANCE PROGRAM AND DECLARATION**

Copies of this declaration and Amarin's Code of Conduct which explain the company's Comprehensive Compliance Program may be obtained by emailing [compliance@amarincorp.com](mailto:compliance@amarincorp.com) or by calling our toll-free number at 877-892-4072. Please advise if you want a copy of this declaration and/or Amarin code of conduct.

Inquiries can be directed to [compliance@amarincorp.com](mailto:compliance@amarincorp.com).

Dated: December 31, 2017