

INSYS Statement regarding compliance with California Health & Safety Code § 119402

NOTICE: Pursuant to California Health & Safety Code, Section §119402, pharmaceutical companies doing business in the State of California are required to make available their Compliance Program and annual written declaration of compliance with the provisions of the Compliance Program. This information is provided pursuant to that requirement.

California Health & Safety Code, Sections §119400 – 119402, (“California Compliance Law”) requires pharmaceutical companies to adopt a Compliance Program in accordance with the April 2003 publication “Compliance Program Guidance for Pharmaceutical Manufacturers” (“OIG Compliance Guidance”) developed by the United States Department of Health and Human Services Office of Inspector General (“OIG”) and policies for compliance with the Pharmaceutical Research and Manufacturers of America (“PhRMA”) “Code on Interactions with Health Care Professionals” (“PhRMA Code”) within six months of any update or revision of the PhRMA Code. Revisions to the July 1, 2002 PhRMA Code were effective January 2009.

Annual Declaration (October 2017)

INSYS is committed to conducting its business ethically and in compliance with all applicable laws. To the best of its knowledge and based on a good faith understanding of the statutory requirements, INSYS declares that it has established a Compliance Program that meets the requirements set forth in California Health & Safety Code, Sections §119400-119402. Accordingly, the Company has established an annual dollar limit of \$2000 per individual on gifts, promotional materials or items or activities to medical or healthcare professionals, as defined under the California Law. INSYS has tailored its Compliance Program to meet the specific needs of the Company and continuously assesses the effectiveness of the Compliance Program. The Company has established an internal monitoring system designed to help ensure compliance with the applicable laws and regulations. However, as recognized by the OIG Compliance Guidance, even an effective Compliance Program cannot eliminate the possibility that one or more individual employees engage in conduct that would be considered improper. When such instances are identified, the Company takes reasonable and appropriate remedial or corrective action in a manner consistent with its Compliance Program. Therefore, subject to the limitations stated here, INSYS declares that, based upon current tracking and monitoring systems, the Company is, in all material respects, in compliance with the provisions of its Compliance Program, hence those of California Health & Safety Code, Sections §119400-119402.

For a written copy of the Compliance Program description,

[Email Compliance@insysrx.com](mailto:Compliance@insysrx.com)