INTRODUCTION

To the best of our knowledge, and based on our good faith understanding of the statutory requirements, we have established a Comprehensive Compliance Program (CCP) in accordance with the “Compliance Program Guidance for Pharmaceutical Manufacturers,” published by the Office of Inspector General, U.S. Department of Health and Human Services (the “HHS-OIG Guidance”) (May 2003) and in compliance with the requirements of Cal. Health and Safety Code §§ 119400-119402.

We have developed a CCP that is tailored to the size, organizational structure, and resources of the company. A description of the CCP can be found on the UCB website.

Recognizing that compliance is a dynamic concept that must be adapted to the characteristics of a particular company, we are continually reassessing our program and will continue to refine these compliance elements, as necessary.

DECLARATION

By making this declaration, we are not asserting that we can prevent individual employees from improper conduct. As of the date of this statement, the CCP is in effect, and these systems will be reassessed on an annual basis.

**Effective June 2020**