



Declaration Under Cal. Health & Safety Code §§ 119400-119402

IBSA Pharma, Inc. (IBSA) is committed to compliance with applicable regulations and authorities in the promotion, distribution and marketing of its products. In order to achieve these goals IBSA has implemented a Comprehensive Compliance Program (CCP) consistent with Cal. Health & Safety Code § § 119400-119402, based on its good faith understanding of the statutory requirements.

IBSA's CCP has been tailored to the unique characteristics and needs of the Company with the expectation that all employees, contractors and vendors adhere to company policies. IBSA takes disciplinary and corrective actions when deemed necessary.

In accordance with California requirements, IBSA has established an annual spending limit of two thousand dollars (\$2,000) per California licensed Health Care Professional (HCP) and intends to monitor employee activities to ensure compliance. IBSA's CCP is available to individuals who request it, please call 800-587-3513 or email medinfo@ibsapharma.com.

October 1, 2020