



Mission Pharmacal Company
Corporate Compliance Program

INTRODUCTION

Mission Pharmacal Company (“Mission” or “Company”) is committed to conducting its business in an ethical manner that is in compliance with all applicable federal and state laws, rules and regulations. Mission also developed a Marketing Code of Conduct (“Code”) that embodies these legal and ethical standards. We expect our directors, officers, employees, contractors, agents and vendors to strictly adhere to these standards.

OVERVIEW OF COMPREHENSIVE CORPORATE COMPLIANCE PROGRAM

Mission is committed to establishing and maintaining an effective Corporate Compliance Program. The structure of the Mission Corporate Compliance Program follows the seven compliance program elements outlined in the Department of Health and Human Services, Office of Inspector General Compliance Program Guidance for Pharmaceutical Manufacturers (“OIG Guidance”) and also incorporates guidance from the Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals (“PhRMA Code”). Mission’s Compliance Program is described in greater detail below.

Mission periodically reexamines the Corporate Compliance Program to ensure that it is efficient and effective. The Corporate Compliance Program may be amended or revised by Mission to meet the Company’s on-going compliance needs and any changes in applicable regulatory requirements or industry standards.

Compliance Infrastructure

Mission has designated a Chief Compliance Officer who is charged with the responsibility of developing, maintaining, operating, and monitoring the Mission Corporate Compliance Program, including overseeing training programs and investigating potential violations of law or Company policy.

Written Policies and Procedures

As part of its Corporate Compliance Program, Mission established its Code consistent with the OIG Guidance and PhRMA Code. Specifically, the Code provides instruction on the principles by which all directors, officers, employees, contractors, agents and vendors of Mission must adhere. Mission also developed policies, procedures and guidelines that provide colleagues with guidance regarding their day-to-day responsibilities. These policies and procedures reflect the Company’s commitment to compliance with federal and state laws. Mission reviews its policies and procedures on a regular basis and revises them as necessary to meet changing requirements.

Training and Education

Mission is committed to providing effective training to its directors, officers, employees, contractors, agents and vendors regarding the Corporate Compliance Program, Code and written policies and procedures. The training program is consistent with federal and state laws and industry guidelines, including the OIG Guidance and the PhRMA Code. The training program includes:

Training for new hires on general policies;

Position-specific training;

Certification by employees of completion of training;

Periodic supplemental training;

Ongoing evaluation of changing legal and regulatory requirements, and development of new training as appropriate; and

New training in response to needs identified through monitoring and auditing.

Communication and Reporting

Mission directors, officers, employees, contractors, agents and vendors may discuss issues, concerns, problems, questions or suggestions with their immediate supervisor or the Chief Compliance Officer. Mission also provides multiple channels for reporting general issues and raising compliance concerns:

- 1 Compliance Hotline 1-800-255-6387, extension 301
- 2 Open Door Policy
- 3 Exit Interviews

We expect all directors, officers, employees, contractors, agents and vendors to promptly report suspected violations of laws and/or Company policy through one or more of these channels. Reports may be made on an anonymous basis via Mission's toll-free Compliance Hotline 1-800-255-6387, extension 301, which is available 24 hours a day, 7 days a week.

Acts of retaliation or retribution against any person who reports a potential violation in good faith is strictly prohibited. Any acts of retaliation or retribution will result in disciplinary action, up to and including termination.

Monitoring and Auditing

Mission conducts monitoring and auditing activities to evaluate whether our policies and procedures adequately address risk areas and compliance with such requirements.

Disciplinary Guidelines

Failure to adhere to Mission's compliance standards as set forth in this Corporate Compliance Program, the Code and/or written policies and procedures may result in disciplinary action, up to and including termination.

Corrective Action

The Corporate Compliance Program supports prompt response and appropriate corrective action for any detected compliance violations. All compliance concerns received by the Chief Compliance Officer or Company management shall be reviewed carefully; investigated in a timely manner, if appropriate; and result in prompt and appropriate corrective action.

STATEMENT OF ANNUAL AGGREGATED LIMIT

In accordance with the requirements of California Health & Safety Code § 119402, Mission set a specific annual dollar limit of \$2,000 on "gifts, promotional items or activities" that may be provided to medical or health professionals in California. This figure represents an upper limit, not a spending goal. Not included in the internal spending limit are any items exempted by California law, such as drug samples for free distribution to patients, financial support for health education scholarships, financial support for continuing education, and payments for professional services. Mission reserves the right to change this limit at any time.

We have incorporated the OIG Guidance and PhRMA Code in the structure and content of our Corporate Compliance Program, Code and written policies and procedures. As appropriate, we will amend and update these materials to ensure compliance with law and industry guidelines. A description of Mission's Corporate Compliance Program, including the Company's written declaration and certification of compliance with California law, can be requested by emailing us at anita.scott@mission-pharmaceutical.com.

RESOURCES

- OIG Compliance Program Guidance for Pharmaceutical Manufacturers, available at oig.hhs.gov/authorities/docs/03/050503FRCPGPharmac.pdf
- PhRMA Code on Interactions with Healthcare Professionals, available at <http://www.phrma.org/about/principles-guidelines/code-interactions-healthcare-professionals>
- Mission's Marketing Code of Conduct