

California Declaration

As part of Circassia Pharmaceuticals plc and its US affiliates' ("Circassia") commitment to operating ethically and in compliance with applicable laws and regulations, Circassia declares that it has established a Comprehensive Compliance Program. To the best of our knowledge and good faith understanding of the statutory language of California Health and Safety Code §119400-119402, the Circassia Compliance Program meets the requirements of establishing a Comprehensive Compliance Program under the statute.

Circassia is a specialty pharmaceutical company focused on respiratory diseases and has a growing portfolio of medical devices and pharmaceuticals. Throughout its operations, it is dedicated to behaving in accordance with its strong PRIDE values of Passion, Recognition, Integrity, Drive and Effectiveness. To further our commitment to these values, Circassia has adopted a Code of Conduct which serves as an affirmation of ethical principles that guide Circassia's business decisions and interactions. The Code of Conduct applies to all Circassia employees and establishes expectations that every employee will act in accordance with applicable laws and Company policies.

As part of its Code of Conduct and as a foundation for its Comprehensive Compliance Program, Circassia has also established written global and local healthcare policies and procedures to support adherence to applicable laws, regulations, and industry codes of conduct. Circassia has derived its policies through adoption of the AdvaMed Code and the PhRMA Code on Interactions with Health Care Professionals in the US as part of its program.

As is set out in the HHS OIG Compliance Program Guidance for Pharmaceutical Manufacturers, the Circassia Compliance Program includes:

- The appointment of a dedicated Compliance Officer
- Documented compliance policies and procedures
- Regular and effective compliance education and training
- Open lines of communication, including a toll-free number for reporting concerns
- Monitoring and auditing activities to continually evaluate and reassess compliance with company compliance policies
- Procedures for responding to identified problems and implementing corrective action.

The Circassia Code of Conduct can be found online by clicking [here](#). Copies of this summary of the Compliance Program and this declaration may be obtained by contacting compliance.US@circassia.com or calling 1-866-275-6469 and asking for the Compliance Department.

In Accordance with California Health and Safety Code, Circassia has established a specific annual dollar limit of \$2500 per healthcare professional (HCP) for meals, promotional materials, items or activities that Circassia may give or otherwise appropriately provide to an individual HCP located in the State of California, subject to permitted exclusions under the statute.

Declared as of August 31, 2018 for the period of September 1, 2018 to August 31, 2019.