

## **NEUROCRINE BIOSCIENCES, INC.**

### **COMPREHENSIVE COMPLIANCE PROGRAM**

Neurocrine Biosciences, Inc. (“Neurocrine”) has adopted this Comprehensive Compliance Program (the “Compliance Program”) effective as of the date set forth below. This Compliance Program is consistent with the recommendations set forth in the April 2003 “Compliance Program Guidance for Pharmaceutical Manufacturers” published by the Office of Inspector General U.S. Department of Health and Human Services (“OIG Guidance”) and the provisions of the Code on Interactions with Healthcare Professionals created by the Pharmaceutical Research and Manufacturers of America (“PhRMA Code”). The Compliance Program applies to Neurocrine officers, directors, employees and, in certain situations, our agents and independent contractors (“Neurocrine Representatives”).

The goal of this Compliance Program is to maintain a culture that promotes the prevention, detection, and resolution of potential violations of law or Neurocrine policy and the highest standards of business ethics. Neurocrine will review and update this Compliance Program from time to time as it reasonably deems appropriate or is required to by law.

#### Written Policies and Procedures

Neurocrine has adopted a Code of Business Conduct and Ethics setting its commitment to compliance by its management, employees and agents. The Code of Business Conduct and Ethics is incorporated in relevant part into this Compliance Program and is available on the Corporate Governance page of the Neurocrine website.

Neurocrine has internal compliance policies in place requiring all Neurocrine Representatives to comply with the provisions of the PhRMA Code as well as the OIG Guidance. In addition, Neurocrine has adopted policies on a variety of other matters, including samples, anti-kickback laws, and interaction with government officials. All such policies require strict adherence to applicable laws and regulations. These policies are updated as needed.

#### Compliance Oversight Responsibility

Neurocrine has appointed a Chief Compliance Officer who is charged with developing, operating and monitoring the Compliance Program. The Chief Compliance Officer reports directly to the Chief Legal Officer and has direct access to the Chief Executive Officer of Neurocrine and has access to other members of senior management and the Neurocrine Board of Directors, if required.

Neurocrine has established a Compliance Committee to advise the Compliance Officer and assist in the implementation of the Compliance Program. The Compliance Committee is comprised of senior management personnel from functional units across Neurocrine.

### Annual Dollar Limit on Gifts or Incentives Provided to Medical or Health Professionals in California

As required by, and in accordance with the definitions set forth in, California Health and Safety Code § 119402(c), Neurocrine has established an annual upper dollar limit on gifts, promotional materials, or items or activities that Neurocrine may give or otherwise provide to an individual medical or health care professional in California equal to \$3,000 per such individual, subject to certain exclusions set forth in California Health and Safety Code § 119402(d).

### Education and Training

All Neurocrine Representatives receive general compliance training on this Compliance Program and the Code of Business Conduct and Ethics as well as training on policies and procedures applicable to their job function and responsibilities. Neurocrine Representatives are trained on how to report compliance concerns through appropriate channels, including anonymously through the Neurocrine Ethics Helpline.

### Internal Lines of Communication.

As a matter of policy, Neurocrine Representatives are required to report known or suspected violations of law, or Neurocrine policies or procedures. Neurocrine strives to provide a work environment that encourages employees to communicate openly with management about all types of workplace issues without fear of retaliation or recrimination. Neurocrine Representatives are encouraged to report any known or suspected violations to their supervisor, functional vice-president, human resources, any member of the Compliance Committee, or any member of the Legal Department. Neurocrine has also established an Ethics Helpline that is available 24 hours a day, 7 days a week at 1-800-688-2908 for making anonymous reports.

### Auditing and Monitoring

Neurocrine will conduct auditing and monitoring activities designed to assess compliance with the Compliance Program and our various policies and procedures as well as the need for future policies and procedures. The nature of our reviews, as well as the extent and frequency of our compliance monitoring and auditing, varies according to a variety of factors, including new regulatory requirements, changes in business practices and other considerations. Results are reported to the Compliance Committee and to appropriate managers and, as appropriate, followed up on specifically, incorporated in training and communication strategies and considered when making choices in connection with ongoing general management of the business.

### Investigations, Corrective Actions and Disciplinary Policies

In the event that Neurocrine becomes aware of any known or suspected violations of this Compliance Program or the relevant policies and procedures, designees of the Compliance Committee shall investigate the circumstances surrounding the known or suspected violation and shall take appropriate corrective action, which may involve disciplinary actions up to and including termination.

### **California Annual Declaration**

As of May 21, 2018, to the best of our knowledge and based on a good faith understanding of the requirements of California Health and Safety Code §§ 119400 – 119402, Neurocrine is, in all material respects, in compliance with this Comprehensive Compliance Program and the statutory requirements.

Copies of this Compliance Program and the Neurocrine Annual Declaration of Compliance can be obtained by calling 1-844-464-7399.