

## Neurocrine Biosciences – Compliant Interactions with Healthcare Providers

Neurocrine Biosciences is a biopharmaceutical company dedicated to discovering, developing and commercializing life-changing treatments for people with serious, challenging and under-addressed neurological, endocrine and psychiatric disorders. We believe that compliance with applicable laws, regulations and company directives is a fundamental part of our mission and values and as such is a key priority for our company.

Neurocrine Biosciences provides only truthful, non-misleading information to healthcare professionals in accordance with applicable laws, regulations, rules, and company policies. Our promotional, educational, and scientific activities are intended to facilitate the safe, effective, and knowledgeable use of Neurocrine Biosciences' products in a manner consistent with the approved prescribing information and appropriate patient care. All promotional materials are reviewed for compliance with FDA requirements and our products are never promoted for off-label uses. Neurocrine Biosciences conducts regular training for all marketing and sales personnel on the applicable product promotion laws, regulations, and industry standards.

To help ensure that we conduct our business with the highest standard of behavior, Neurocrine Biosciences created a Comprehensive Compliance Program. To view the Comprehensive Compliance Program, click [here](#). We believe that our behavior reflects who we are at Neurocrine Biosciences and we recognize that a robust compliance program is key to maintaining the trust of the public and the respect of the industry, and our Comprehensive Compliance Program is an essential component of our goal to become a trusted, respected, and innovative company in the healthcare industry. Our goal is to be recognized by patients, providers and payers for delivering innovative and life-changing treatments, and by employees, partners and investors for having great corporate culture, partner relations and customer service.

The U.S. Department of Health and Human Services Office of Inspector General's (OIG) [OIG Compliance Program Guidance for Pharmaceutical Manufacturers](#) and the Pharmaceutical Research and Manufacturers of America (PhRMA) [Code on Interactions with Healthcare Professionals](#) serve as the foundation of our Comprehensive Compliance Program. Neurocrine Biosciences incorporated the following seven fundamental elements of an effective compliance program listed in the OIG Guidance into our Comprehensive Compliance Program:

1. Written policies and procedures
2. Designated compliance officer and compliance committee which includes our Chief Legal Officer, Chief Commercial Officer, Chief Financial Officer, Chief Medical Officer, Chief Regulatory Officer, Chief Human Resource Officer and Vice-President of Medical Affairs
3. Effective training and education
4. Effective lines of communication
5. Internal monitoring and auditing
6. Enforcement of standards through well-publicized disciplinary guidelines

## 7. Prompt response to detected problems through corrective actions

In addition to these principles, our Comprehensive Compliance Program also incorporates legal principles, additional OIG Guidance, and lessons from enforcement actions. Two critical components of our Comprehensive Compliance Program are our *Code of Ethics* and our Ethics Hotline.

### **Neurocrine Biosciences Code of Ethics**

The Code contains basic guidelines and requirements for ethical behavior. Neurocrine Biosciences employees, agents, or anyone representing the company are required to certify to adherence to the Code annually. To view the Code, click [here](#).

### **Ethics Hotline**

Neurocrine Biosciences has established several ways for our employees, vendors and others to raise matters of concern related to the way the company is conducting its business, such as a suspected breach of ethics, compliance requirements, financial accounting principles, or company policy. One avenue for reporting such issues is our Ethics Hotline available at:

Main Number: (800) 688-2908

Website: [NeurocrineEthics.com](http://NeurocrineEthics.com)

Available 24 hours a day, 7 days a week

Neurocrine Biosciences takes all reports to the Ethics Hotline seriously and handles reports on a case-by-case basis. Investigations are handled in as confidential a manner as possible under the circumstances. After a thorough investigation, the company will determine whether misconduct has occurred and will take appropriate action to address any confirmed misconduct and prevents its recurrence. Reports to the Ethics Hotline may be made anonymously, though it is important to provide sufficient details to enable the company to investigate the matter fully and to take appropriate corrective action as needed. Neurocrine Biosciences policy prohibits retaliation against employees who report suspected misconduct in good faith.

### **Annual California Act Declaration of Compliance**

As part of Neurocrine Biosciences' continuing commitment to corporate compliance, the company declares that, to the best of its knowledge, and based on a good faith understanding of the statutory requirements of California Health and Safety Code §§ 119400 - 119402 (the "California Act"), it has adopted a Comprehensive Compliance Program that satisfies the requirements of the California Act and that, as of the date of this declaration, Neurocrine Biosciences believes it is in compliance with its Comprehensive Compliance Program and the requirements of the California Act in all material respects.

Neurocrine Biosciences requires our employees to comply with our *Code of Ethics* and compliance policies designed to prevent and detect violations of law and/or our Comprehensive



Compliance Program. In the event Neurocrine Biosciences becomes aware of a potential violation, Neurocrine Biosciences will, where appropriate, take reasonable steps to investigate the matter, pursue disciplinary action, and/or implement corrective measures to prevent future violations. Neurocrine Biosciences will evaluate its Comprehensive Compliance Program on a regular basis and update it as needed.

For purposes of complying with the California Act, Neurocrine Biosciences has established a maximum annual aggregate dollar limit of per covered healthcare professional for promotional materials, meals, and other items of value provided by Neurocrine Biosciences. This annual spending limit does not include the value of: (1) drug samples provided to healthcare professionals intended for free distribution to patients; (2) financial support of independent educational programs, including continuing medical education; (3) financial support for educational scholarships and fellowships; and (4) payments made to healthcare professionals in exchange for bona fide professional services that are consistent with the fair market value of the services provided.

Interested parties may view Neurocrine Bioscience's Comprehensive Compliance Program online. Copies of this declaration and any of the Comprehensive Compliance Program materials may also be obtained by calling 1-844-464-7399 or by sending an email to [compliance@neurocrine.com](mailto:compliance@neurocrine.com).

Dated: 28/May/2020