

## **CALIFORNIA ANNUAL DECLARATION OF COMPLIANCE**

Avanir Pharmaceuticals, Inc. (“Avanir”) is committed to conducting its business ethically and in accordance with all applicable laws. We have developed a comprehensive compliance program (CCP) in accordance with California Health and Safety Code sections 119400 and 119402. To the best of our knowledge and based on our good faith understanding of the statutory requirements of this California law, we are, in all material respects, in compliance with the CCP and these statutory requirements.

The Office of the Inspector General has recognized in the April 2003 *Compliance Program Guidance for Pharmaceutical Manufacturers* that the implementation of an effective compliance program cannot entirely eliminate the chance of improper conduct. Accordingly, while Avanir cannot eliminate the chance of individual employees engaging in conduct that may deviate from its policies, Avanir’s CCP is reasonably designed with the goal of preventing, detecting and addressing such improper conduct.

If you would like to receive copies of this Declaration and Avanir’s CCP, you may call the Avanir AlertLine at 855-809-3045 and request printed copies.

Dated: July 1, 2019