

## **Comprehensive Compliance Program**

QOL Medical, LLC (“QOL”) has established this Comprehensive Compliance Program (“CCP”), which is designed to comply with applicable federal and state laws (including California Health and Safety Codes §§ 119400-119402 (“CHSC”)), the *Compliance Program Guidance for Pharmaceutical Manufacturers* published by the Office of Inspector General of the U.S. Department of Health and Human Services (the “OIG Guidance”), and the *Code on Interactions with Health Care Professionals* published by the Pharmaceutical Research and Manufacturers of America (“PhRMA Code”).

### **1. Written Policies and Procedures**

QOL has implemented comprehensive written policies and procedures that are designed to comply with applicable federal and state laws (including the CHSC), OIG Guidance, and the PhRMA Code. All QOL personnel must comply with applicable policies and procedures.

### **2. Compliance Officer & Compliance Committee**

QOL has a Compliance Officer who serves as the focal point for compliance activities, has experience and knowledge of compliance and operational issues relevant to pharmaceutical manufacturers, and is responsible for ensuring compliance with QOL’s CCP. QOL also has a Compliance Committee that advises the Compliance Officer and assists in the implementation of QOL’s CCP.

### **3. Training**

QOL conducts routine compliance training. New employees receive compliance training at the time of hire and periodically thereafter (at least annually). Training covers a range of compliance-related topics, including applicable laws and regulations, QOL’s CCP, and QOL’s policies and procedures.

### **4. Communication**

QOL personnel are encouraged to report any compliance concerns to their manager, the Legal Department, the Compliance Officer, or anonymously via a compliance hotline.

### **5. Auditing and Monitoring**

QOL routinely audits and monitors the effectiveness of its CCP, including compliance with applicable laws and regulations, QOL’s CCP, and QOL’s policies and procedures.

### **6. Investigation, Enforcement, and Discipline**

QOL promptly investigates compliance concerns and takes corrective and/or disciplinary action, up to and including discharge/termination, in response to compliance violations.

### **7. Responses to Detected Problems**

QOL is committed to compliance and continually evaluates and refines its CCP to ensure that it is both consistently followed and effective.

### **8. Annual Dollar Limits Pursuant to CHSC § 119402(d)**

Subject to CHSC §§ 119402(d)(2)-(3) and QOL’s policies and procedures, an annual limit of \$3,000 shall apply to any items or activities described in CHSC § 119402(d)(1) that are provided by QOL to any individual medical or health care professional in California during a calendar year.