

ANNUAL DECLARATION FOR PURPOSES OF CALIFORNIA HEALTH & SAFETY CODE, §§ 119400-119402

Helsinn Therapeutics (U.S.) Inc. (“Helsinn” or the “Company”) has established a comprehensive Compliance Program in accordance with the April 2003 “Compliance Program Guidance for Pharmaceutical Manufacturers” (“OIG Guidance”) and the “Pharmaceutical Research and Manufacturers of America (PhRMA) Code.” In addition, as part of its Compliance Program, Helsinn has established a specific annual aggregate dollar limit of \$2,000 on gifts, promotional materials, or activities that Helsinn may provide to an individual medical or healthcare professional in California. This amount does not include the value of pharmaceutical drug samples, grants for medical education, medical scholarships, professional service or consulting fees, patient education materials, and approved scientific reprints. The foregoing limit does not represent a usual, customary, average or typical amount for medical or health care professionals. This annual aggregate limit is based on an estimate of the maximum value of gifts, promotional materials and other items or activities as defined herein that a California medical or health care professional may receive in one year.

ANNUAL DECLARATION (JULY 1, 2017)

To the best of its knowledge and based on a good faith understanding of the applicable statutory requirements, the Company has established a comprehensive Compliance Program that meets the requirements set forth in California Health & Safety Code, Sections 119400-119402. Helsinn’s Compliance Program is dynamic and tailored to the size, organizational structure and resources of the Company.

By making this declaration, Helsinn is neither certifying nor representing that it can prevent individual employees from improper conduct or otherwise violating the standards set forth in its Compliance Program. As recognized by the OIG Compliance Program Guidance, even an effective compliance program cannot eliminate the possibility that one or more individual employee engages in conduct that would be considered improper. In such situations, the Company takes reasonable and appropriate remedial or corrective action in a manner consistent with its Compliance Program.

For a written copy of the Compliance Program description or this Declaration, call (855) 409-0016.