

July 1, 2020
Orexo US, Inc.
Annual Declaration pursuant to the
California Health and Safety Code §§ 119400 -119402

Section 119402 of the California Health & Safety Code requires a pharmaceutical company to adopt a Comprehensive Compliance Program that is in accordance with the U.S. Department of Health and Human Services, Office of Inspector General's ("OIG") "Compliance Program Guidance for Pharmaceutical Manufacturers" ("OIG Compliance Guidance"), and include policies for complying with the Pharmaceutical Research and Manufacturers of America Code ("PhRMA Code"). Further, the law requires that the Comprehensive Compliance Program include an annual limit for certain promotional expenditures to healthcare professionals covered by this California law. Finally, the law requires that each manufacturer make its Comprehensive Compliance Program and an annual declaration of compliance publicly available.

Orexo US, Inc. ("Orexo" or the "Company") is committed to complying with applicable laws, regulations and industry standards. Orexo commits significant time and resources to the development of each of the policies, procedures and processes that make up its Comprehensive Compliance Program (the "Program"). The Program is designed to ensure that Orexo is able to identify potential non-compliance through audit and employee reporting and provide a mechanism for investigation and resolution of such situations. In the event that Orexo becomes aware of any potential or actual violations of policy or law, an investigation will be triggered and, if necessary, followed by appropriate remedial or corrective actions. Resolution, when appropriate, may involve disciplinary action up to and including termination of employment. The Program is regularly assessed and evaluated to ensure consistency with additional laws and guidance. The Program also includes an annual aggregate limit of \$1,500 for covered promotional expenditures per covered California health care professional.

In ensuring compliance coverage through policies, procedures and processes, Orexo reviewed the OIG Compliance Guidance and the PhRMA Code, and hereby declares that, to the best of its knowledge, its Program is consistent with a reasonable interpretation of those guidelines and is in compliance with other applicable laws and regulations as of the date of this declaration. Based upon Orexo's good faith understanding of applicable laws and regulations, and to the best of its knowledge, Orexo is in all materials respects in compliance with its Compliance Program and the California law.

Anyone wishing to obtain a copy of Orexo's Corporate Compliance Program Overview, its Code of Business Conduct and Ethics or a copy of this declaration can call (855) 982-7658, email info-us@orexo.com or go to <http://www.orexo.com/us/>.