

More on Iroko's Compliance Program

- Mission of the Compliance Program

The mission of the Compliance Program is to: (a) prevent, detect, and correct violations of law and company policy and procedures; (b) assure the establishment of compliance-related policies and procedures for business operations; (c) assure development of training and other programs designed to educate employees regarding applicable policies, standards and codes; (d) implement a mechanism to evaluate the effectiveness of essential elements of the Compliance Program; (e) implement a mechanism for internal reporting to enable timely investigation and resolution; and (f) assure appropriate corrective action is taken to prevent recurrence of misconduct.

- Governance: Involvement and Dedicated Compliance Personnel

Iroko's Compliance Office is responsible for overseeing all aspects of Iroko's global compliance program, including implementing Code of Conduct training; developing and conducting training on key areas of legal risk; developing and implementing monitoring systems; providing channels for employees, suppliers, agents, and customers to report suspected legal and ethics violations; and reporting compliance and ethics activities and issues as appropriate.

The Executive Director of Compliance leads the Compliance Program and promotes leadership, oversight through the Executive Compliance Committee.

- Written Policies and Procedures

Iroko has implemented policies and procedures that provide colleagues with direction in their day-to-day activities including, but not limited to, our Code of Conduct. Iroko has also implemented the Pharmaceutical Research and Manufacturers of America (PhRMA) "Code on Interactions with Healthcare Professionals" (PhRMA Code).

- Effective Training and Communication

Iroko is committed to providing effective training to employees, managers, officers, directors and certain of our agents/consultants on our Compliance Program on an ongoing basis. Training is conducted via a variety of methods including online education and live classroom training.

- Communicating Compliance Issues and Concerns

Fostering an environment that encourages open communication regarding our Code of Conduct, Company policies, or concerns about suspected improper business practices is important to Iroko and forms a key aspect of our Company culture. Iroko provides multiple channels for raising compliance concerns.

Open Door Policy

The Company has an "Open Door Policy" and encourages colleagues to discuss all issues, concerns, problems and suggestions with their immediate supervisors or other managers without fear of retaliation.

Compliance Helpline and Web-Reporting Tool

The Compliance Helpline can be reached by phone or online via the web-reporting tool. These resources are accessible 24 hours a day, 7 days a week, 365 days a year and are operated by specially trained third party representatives:

1-855-IROKO20 (1-855-476-5620)

For colleagues outside the U.S., Puerto Rico, and Canada, dial the following Universal International Freephone Number **+800-1777-9999** or dial **+1-720-514-4400** for collect call/reverse charges. If using the collect call number, operator assistance may be required and local charges may apply.

Iroko has chosen an incident reporting system which is accessible via **www.IrokoComplianceHelp.com** to give colleagues online reporting capabilities. The service is provided by an independent third party. Confidential and anonymous reports will instantly and discreetly be forwarded to appropriate personnel in the Legal Department. After submission, the system will provide a unique access number and users will be asked to create a personal password. This information will allow re-entry to anonymously receive and send messages pertaining to the report as well as check the status of the report.

Contacting the Compliance Office

The Compliance Office may also be contacted directly:

Email: Compliance@Iroko.com

Mail: Iroko Compliance Office, Iroko Pharmaceuticals, LLC; One Kew Place, 150 Rouse Blvd, Philadelphia, PA 19112

- **Internal Monitoring and Auditing**

Internal monitoring and auditing are vital parts of the Compliance Program. The Compliance Office identifies potential risk areas on which to focus its auditing and monitoring activities. With our monitoring and auditing mechanisms, Iroko is able to verify the efficient operation of its policies and practices, determine where enhancements can be made, and have the capability to detect and prevent deviations before, in certain circumstances, they grow into larger compliance concerns.

- **Enforcement Through Appropriate Discipline and Recognition**

Our Code of Conduct puts all colleagues, including Management, on notice that failure to adhere to our compliance standards may have disciplinary consequences, up to and including termination of employment. If an investigation suggests that discipline may be warranted, appropriate action is taken. Likewise, Iroko's practices recognize colleagues for exemplary behaviors that serve as best-in-class examples of Iroko's company values and core commitment to integrity.

- Prompt Response and Corrective Action

Our compliance program supports prompt response and corrective action as appropriate under the circumstances. It is expected that compliance concerns referred through any of the many communication channels will be carefully reviewed, thoroughly and thoughtfully investigated in a timely manner, and appropriately resolved. Upon conclusion of an internal investigation, corrective action and preventative measures are determined and implemented as appropriate.