

## **SCHEDULE A COMPREHENSIVE COMPLIANCE PROGRAM**

The Limit Amount set forth is to be regarded as a maximum upper limit determined to ensure compliance by the Company with Section 119402 of the California Health and Safety Code, which requires, among other things, the publication of such a maximum limit and annual declarations of Company compliance. The Company would anticipate that such average value would be a much smaller amount than the posted Limit Amount. The Company further reserves the right to adjust the Limit Amount set forth herein to take into account changing promotional programs of the Company from time to time.

For purposes of Section 119402 of the California Health and Safety Code, the Company has established a limit of \$3,000 (the "Limit Amount") per annum on the monetary value of educational items, promotional materials and other items or activities which may be provided to individual medical or healthcare professionals.

The Limit Amount is intended to encompass the following activities:

- Informational or educational lunches and dinners
- Informational or educational breakfasts or snacks
- Other office-based activities
- Activities external to any office setting at a venue judged modest by local standards and conducive to the exchange of educational information
- Educational items furnished by sales representatives or allocated by corporate marketing department
- Educational speaker programs and roundtable discussions

The Limit Amount is not intended to include the following:

- Package inserts, reprints of clinical studies or journal articles
- Educational grants or sponsorships
- Informational or marketing pieces
- Patient assistance and other patient-related items
- Any other item of nominal value augmenting a healthcare professional's education or enhancing patient care