

## **Declaration of Compliance with California Health & Safety Code § 119400 - 119402 (the California Compliance Law)**

**Notice:** *This information is provided pursuant to the requirements of the California Compliance Law, which requires pharmaceutical companies operating in California to make available their Compliance Program and provide an annual written declaration of their adherence to the requirements of the Compliance Program.*

Neurotech Pharmaceuticals (Neurotech) has established a comprehensive Compliance Program based on the expectations set forth in the United States Department of Health and Human Services (HHS) Office of Inspector General's (OIG's) *Compliance Program Guidance for Pharmaceutical Manufacturers* (OIG Guidance) and the Pharmaceutical Research and Manufacturers of America (PhRMA) *Code on Interactions with Health Care Professionals* (PhRMA Code).

In addition, Neurotech has established a limit of \$2,500 on gifts, promotional materials, meals, and items or activities that may be provided to an individual health care professional licensed in California each year. This limit may be revised by Neurotech periodically, in which case the revised limit will be published in this section of the Neurotech website. This limit does not include the value of drug samples provided to health care professionals intended for free distribution for patients, financial support for continuing medical education forums, financial support for health educational scholarships, and payments made for legitimate professional services (e.g., consulting).

### **Annual Declaration of Compliance (June 2025)**

Neurotech is committed to upholding the highest standards of ethical business conduct. Neurotech has established procedures to identify, detect, and prevent potential violations of its Code of Conduct, Company policies and procedures, and applicable laws and regulations. Upon identification of any violations, Neurotech takes appropriate and reasonable actions to investigate, discipline, and implement corrective measures, as necessary.

To the best of its knowledge and based on a good faith understanding of the applicable statutory requirements, Neurotech is, in all material respects, in compliance with the provisions of California Compliance Law.

For more information on Neurotech's Compliance Program or to obtain a copy of this declaration, please call 1 (401) 333-3880 or email [neurotech@neurotechusa.com](mailto:neurotech@neurotechusa.com). To report any compliance questions or concerns, please contact our Compliance Hotline (anonymous) at 1 (833) 280-2776 or [ethicspoint@neurotechusa.com](mailto:ethicspoint@neurotechusa.com).