

# **SAREPTA THERAPEUTICS**

## **Comprehensive Compliance Program**

(As required by the California Health & Safety Code section 11904)

Sarepta's vision is to transform how the world approaches the treatment of serious and life threatening diseases by unlocking the potential of RNA-based technologies. Recognizing the complexity of this goal, we focus on rare, infectious and other diseases with tremendous unmet needs - areas in which new therapies have the potential to make dramatic improvements in the lives of patients.

Our commitment to our community extends well beyond the development and commercialization of meaningful therapies. We are dedicated to delivering advances in medicine, as well as empowering our employees and partners to support the people and places around us.

We exercise that commitment by maintaining the highest standards of honest and ethical business conduct. We believe that Sarepta's integrity and reputation depend on the honesty, fairness and integrity brought to the job by each person associated with us.

Our Code of Business Conduct and Ethics reflects the business practices and principles of behavior that support this commitment. Sarepta's Code of Business Conduct and Ethics is available to the public through its posting on this website.

To conduct our business with integrity and ethically, Sarepta has established a compliance program. This program has been developed in accordance with the laws applicable to our industry, the "Program Guidance for Pharmaceutical Manufacturers" published by the Office of the Inspector General of the U.S. Department of Health and Human Services and the Code of Interactions with Healthcare Professionals of the Pharmaceutical Research and Manufacturers of America (PhRMA).

Consistent with the OIG Guidance Sarepta's compliance program includes:

- A compliance officer and compliance committee charged with the responsibility for developing, operating and monitoring of the compliance program and with authority to report directly to the board of directors and the company's chief executive officer.
- Written standards of conduct, policies, and practices that documents the company's commitment to compliance and requirements to strictly follow fraud and abuse laws, include:
  - The integrity of company-generated data that is used for government reimbursement purposes.
  - Prohibition of kickbacks and illegal remuneration to any persons to gain business.
  - Compliance with laws regulating drug samples.
  - Promotion and product information that are truthful and not misleading.
- Regular education and training programs for all applicable employees.
- Line of communication between the compliance officer and all employees, including a process to receive complaints and ask questions (a hotline). Our policies and practices protect the anonymity of employees who make complaints and prohibit retaliation.
- Use of audits and other techniques to monitor compliance and identify and address risk.
- Enforcement of compliance obligations through guidelines that include disciplinary action for non-compliance.

- Mechanisms to promptly and properly investigate and respond to reports of non-compliance, including processes to initiate corrective measures and to report offenses to the relevant government authorities where appropriate.

In addition, Sarepta has adopted policies and practices consistent with the PhRMA Code that govern the interactions with healthcare professionals. These policies including appropriate:

- Support for medical education, as well as the use of healthcare professionals to provide services to the Company as researchers, consultants and speakers.
- Provision of business courtesies.
- Making of grants and charitable contributions so that such funds are not conditioned, express or implied, on any agreement to prescribe, purchase, recommend, influence or provide favorable formulary status for any Sarepta product.
- Promotion of Sarepta products in compliance with the U.S. Food and Drug Administration's regulatory framework regarding promotion of pharmaceutical products.

## **CALIFORNIA**

### **2019 ANNUAL DECLARATION OF COMPLIANCE**

As required by California Health & Safety Code section 119402, with specific reference to the provision of "gifts, promotional material, or items or activities" that a pharmaceutical company may provide to an individual medical or healthcare professional, Sarepta established an aggregate dollar limit of \$2,000.00 per year on applicable gifts, promotional material, or items or activities for each medical or healthcare professional in the State of California. The dollar limit is a maximum only and may be revised by Sarepta from time to time.

To the best of our knowledge, as of July 1, 2019, Sarepta is in material compliance with its Comprehensive Compliance Program and the requirements of the California Health & Safety Code section 119402.

To obtain a copy of this declaration and certification please call the Compliance Helpline at toll-free at +1-800-729-0021 or the Chief Compliance Officer, Ryan Brown, who can be reached at 617-301-8692 or via email at [www.sarepta.ethicspoint.com](http://www.sarepta.ethicspoint.com).