

California Health and Safety Code §119402

On September 29, 2004 California Governor Arnold Schwarzenegger signed into effect California Health and Safety Code §§119400-402 requiring pharmaceutical companies, including Braintree, to adopt comprehensive compliance programs (CCPs) relating to their interactions with healthcare professionals (HCPs). The CCP must be in accordance with both the Pharmaceutical Research and Manufacturers of America (PhRMA) Code on Interactions with Healthcare Professionals and with the "Compliance Program Guidance for Pharmaceutical Manufacturers," published by the Office of Inspector General (OIG), U.S. Department of Health and Human Services.

The statute requires each pharmaceutical company to:

- Establish in its CCP a specific annual dollar limit on gifts, promotional materials, or items or activities that the pharmaceutical company may give or otherwise provide to a health care professional;
- Make an annual written declaration that it is in compliance with its CCP and the new law;
- Make its compliance program and its annual declaration of compliance available to the public on its website;
- Provide a toll-free number to obtain a copy of the CCP and the annual written declaration; and;
- As changes are made to either the OIG Guidance or the PhRMA Code, the company's CCP must be updated with corresponding modifications within six months.

Braintree's declaration of compliance with California Health and Safety Code §§119400-402 is listed below.

For more information see the Braintree, A Part of Sebelo Pharmaceuticals Code of Conduct.

California: Declaration of Compliance by Braintree, A Part of Sebelo Pharmaceuticals (January 1, 2019 – December 31, 2019)

To the best of our knowledge, as of January 1, 2019, Braintree, A Part of Sebelo Pharmaceuticals is in material compliance with its comprehensive compliance program and the requirements of the California Health & Safety Code. It is Braintree's' expectation that all employees and contractors comply with its comprehensive compliance program and all policies that support this program. Braintree is committed to assessing ongoing compliance with the comprehensive compliance program, which is designed to prevent, detect and address potential or actual instances of non-compliance.

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