



General Provisions Policy

A. OVERVIEW

This policy applies to our U.S. operations and covers Sales and Marketing, Pricing, Prescription Drug Marketing Act, and Post-Marketing Research (collectively referred to as “Sales and Marketing”) activities.

B. TRAINING

Valeant provides periodic training to employees, as appropriate to their responsibilities, on the Company’s Sales and Marketing policies. Specific topics include the Anti-Kickback Statute, Calculation and Reporting of Pricing, and Healthcare Fraud and Abuse. Employees who fail to participate in the training are subject to disciplinary action, up to and including termination of employment.

C. AUDIT AND MONITORING

Valeant’s internal audit function performs periodic audits to verify compliance with the Company’s Sales and Marketing policies and reports any recommendations for improvement to the appropriate management and staff. These audits are documented and incorporated by reference into the Company’s comprehensive Compliance Program.

D. POSTING OF PROGRAM AND DECLARATION OF COMPLIANCE

To ensure compliance with the related regulations, Valeant will post annual declarations of compliance with its Compliance Program and with Chapter 8 of Part 15 of Division 104 of the California Health and Safety Code. Additionally, the Company has established a toll-free number for individuals to request a copy of the Company’s related Sales and Marketing policies as well as the Company’s Declaration of Compliance.

E. POLICY UPDATES

Valeant will update all applicable policies and the Company’s comprehensive Compliance Program as required for any revision to the Pharmaceutical Research and Manufacturers of America (“PhRMA”) Code or to other related regulations, and communicate the revisions to the appropriate employees and other affected individuals as appropriate.