



## **Allergan plc COMPREHENSIVE COMPLIANCE PROGRAM**

### **1. Compliance with Law**

All colleagues, officers and directors of the Company shall respect and comply with all applicable federal, state, local and foreign laws and regulations.


This Comprehensive Compliance Program is consistent with the United States Department of Health and Human Services, Office of Inspector General's April 2003 Compliance Program Guidance for Pharmaceutical Manufacturers. The Program is designed to reasonably detect, prevent, where possible, and remediate violations of applicable laws, rules, and regulations, Company Policies, the July 2002 Pharmaceutical Research and Manufacturers of America (PhRMA) "Code on Interactions with Health Care Professionals and other industry guidance described herein. It is also designed to promote a BOLD culture of integrity within the Company. This Program does not summarize all laws and regulations applicable to the Company and its colleagues, officers and directors. All colleagues are required to consult a supervisor, manager or other appropriate representative, as well as the various guidelines and updates provided by the Company, with respect to specific laws and regulations applicable to the Company and/or its business.

The standards set forth herein are reflected in the Company's written Code of Conduct which is applicable to all colleagues, officers and directors of the Company.

### **2. Our Compliance Program**

Allergan has a comprehensive, global compliance program, led by our Global Compliance Department. The Global Compliance Department, under the guidance of our Global Chief Compliance Officer, and with oversight by the Audit and Compliance Committee of the Board of Directors, works closely with all Allergan colleagues to promote compliance with the law and act in accordance with our values and our Code of Conduct.

Allergan maintains a culture that encourages integrity and a commitment to compliance with the law and our policies. A core component to the Allergan BOLD culture and our Code of Conduct is "always doing what is right," the values of which are established by Allergan's CEO, Board of Directors and Executive Leadership Team, and cascaded down



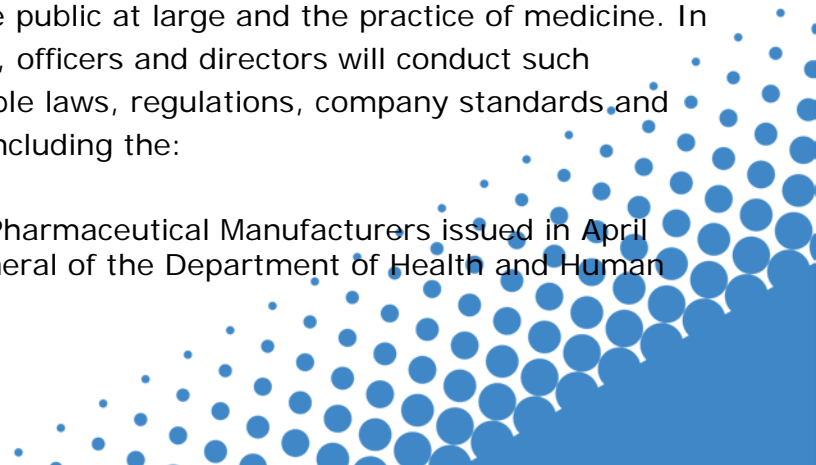
the organization through business unit and support function leadership and management teams.


Our Comprehensive Compliance Program is aligned to the seven elements of an effective compliance program, as well as applicable industry codes. The components to our Compliance Program include:

1. Implementing written policies and standards and the Allergan Code of Conduct
2. Designating a Compliance Officer and Compliance Committee
3. Conducting effective training and education
  - a. Training on, and communication of, our Code of Conduct and written compliance policies
4. Developing effective lines of communication
  - a. Anonymous reporting and communication by our colleagues via the *Allergan Integrity Action Line*
  - b. Transparency and disclosures, as required by law or industry code
5. Conducting and/or collaborating on internal monitoring and auditing
  - a. Risk assessments
  - b. Assurance reviews
  - c. Due diligence and screening of colleagues and Business Partners, as allowed by law
6. Enforcing standards through well-publicized disciplinary guidelines
7. Responding promptly to detected problems and undertaking corrective action
  - a. Investigations of reports of non-compliance, followed by appropriate corrective and disciplinary action

### **3. Interactions with Healthcare Professionals - Purpose and Standards**

The Company is committed to operating with the highest level of integrity, as well as following legal requirements, in its relationships with healthcare professionals. The Company's interactions with healthcare professionals are, at all times, for the purpose of providing timely, accurate and appropriately balanced information available regarding our products, designed to benefit patients, the public at large and the practice of medicine. In furtherance of this purpose, all colleagues, officers and directors will conduct such interactions in compliance with all applicable laws, regulations, company standards and relevant industry compliance guidelines, including the:

- Compliance Program Guidance for Pharmaceutical Manufacturers issued in April 2003 by the Office of Inspector General of the Department of Health and Human Services
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- Code on Interactions with Healthcare Professionals (PhRMA Code) adopted in July 2002 by the Pharmaceutical Research Manufacturers of America with revisions effective January 1, 2009
  - Code of Ethics on Interactions with Health Care Professionals (AdvaMed Code) adopted in 2003 by the Advanced Medical Technology Association with revisions effective July 1, 2009
  - Guidelines of the American Medical Association (“AMA”)
  - Requirements of the Prescription Drug Marketing Act (PDMA)
  - Guidelines of the Accreditation Council for Continuing Medical Education (ACCME)

#### **4. Interactions with Healthcare Professionals - Specific Guidance**

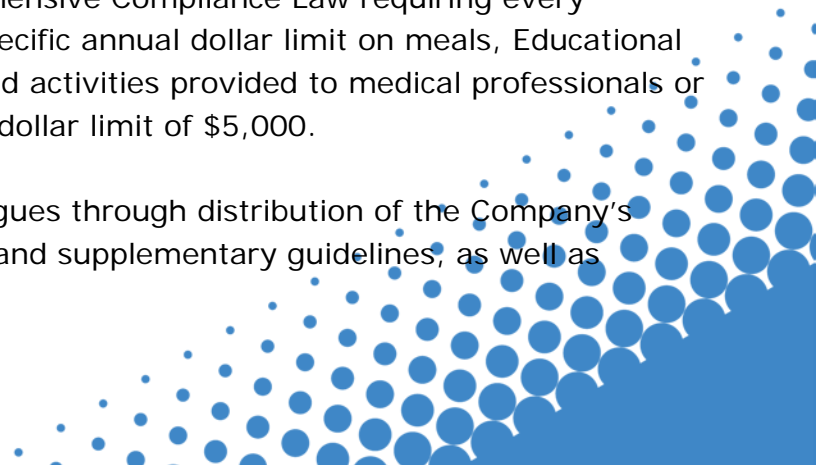
The Company’s Comprehensive Compliance Program includes specific guidance regarding interactions between Company representatives and other personnel with healthcare professionals and the healthcare community as follows:

- Informational lunches
- Speaker programs
- Pre-launch meetings
- Sponsorships
- Educational items
- Medical education grants
- Peer-to-peer physician programs
- Physician consulting and advisory arrangements
- Drug Sampling

The Comprehensive Compliance Program also includes specific guidance as to the use of Company promotional materials, the prevention of promotional activities that are not consistent with a product’s approved labeling, interactions with physicians who are speakers at Company-sponsored programs as well as the use of prescribing information and other product data.

In accordance with the California Comprehensive Compliance Law requiring every pharmaceutical company to establish a specific annual dollar limit on meals, Educational Items, and other Promotional Materials and activities provided to medical professionals or HCPs, Allergan has established an annual dollar limit of \$5,000.

Specific guidance is furnished to all colleagues through distribution of the Company’s Compliance Policies and periodic updates and supplementary guidelines, as well as





through the Company's periodic training programs.

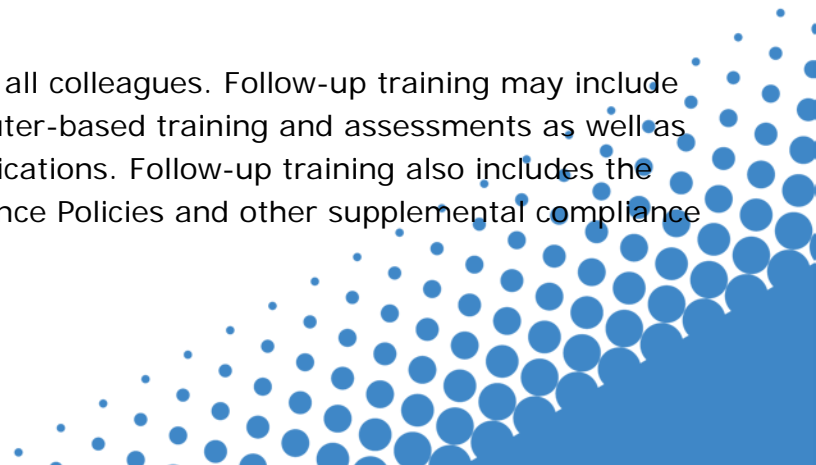
## **5. Executive Leadership Team**

Allergan currently has an Executive Leadership Team (ELT) comprised of the Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Chief Commercial Officer, Chief Legal Officer, Chief R&D Officer, Chief Human Resources Officer, Global Chief Compliance Officer, Chief Communications Officer, Executive Vice President International and Executive Vice President Business Development. Members of the ELT meet regularly, operate as a top management team, and are accountable for the overall performance of the Company. The ELT is also responsible for the performance of the business, including compliance oversight, and the functional units that the ELT members lead. The Executive Vice President and Global Chief Compliance Officer is a member of the ELT and advises and makes recommendations to the ELT regarding compliance issues. The ELT supports the Global Chief Compliance Officer in fulfilling his responsibilities (e.g., assists in the analysis of Allergan's risk areas, and oversees Compliance monitoring and investigations). The ELT also serves as the Compliance Committee for the company and the Global Chief Compliance Officer presents to the ELT on compliance matters and updates. The Global Chief Compliance Officer also escalates critical compliance matters to the ELT.

## **6. Compliance Training and Education**

All newly hired colleagues receive Compliance Policies applicable to his or her area of responsibility and agree to abide by the Code of Conduct at all times and conform to the Company's Comprehensive Compliance Program requirements. All colleagues also receive general compliance training, which is electronically distributed and tracked. All sales colleagues are required to participate in a formal introductory Compliance Overview training. All colleagues are provided a means to engage with Global Compliance to ask questions or seek additional guidance.

Follow-up training is regularly provided to all colleagues. Follow-up training may include live training at Company meetings, computer-based training and assessments as well as ongoing regular bulletins, letters and publications. Follow-up training also includes the receipt of periodic updates to the Compliance Policies and other supplemental compliance materials.





## **7. Effective Lines of Communication**

The Company fosters a “speak up” culture where colleagues can ask questions or report potential instances of inappropriate activity without fear of retribution. All colleagues are educated on who to turn to when seeking answers to questions or reporting possible violations of law, regulation or Company Policy. To that end, colleagues are encouraged to openly and candidly communicate with respect to issues and concerns in a timely manner. Any actual or perceived violation of Company Policy must be reported to supervisory personnel, the Human Resources Department, the Global Compliance Department and/or the Legal Department, or the Global Security Department, and may be done in an anonymous manner, where permitted by local regulations.

## **8. Colleague Hotlines**

In addition to other complaint or reporting procedures set forth, the Company operates a confidential toll-free colleague phone line to help ensure that potential violations are properly reported and thoroughly investigated:

### *Allergan Integrity Action Line*

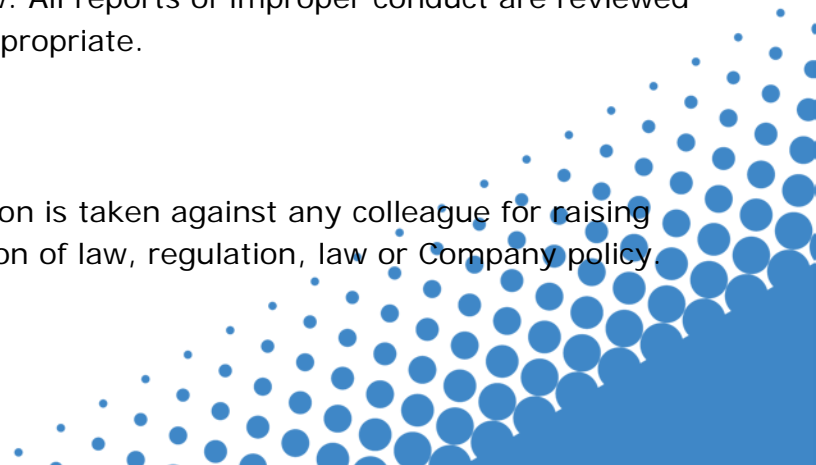
This hotline is available to respond to calls and inquiries 24 hours a day, seven days a week, in most languages. All information provided via the Allergan Integrity Action Line is confidential and anonymous, where permitted.


1-888-645-0090

Information from each call is triaged and communicated to the appropriate Company colleague, depending on the nature of the issue or concern raised. All calls are kept confidential to the extent permitted by law. All reports of improper conduct are reviewed and investigated and action is taken as appropriate.

## **9. Non-Retaliation**

It is the Company's policy that no retaliation is taken against any colleague for raising concerns or allegations of potential violation of law, regulation, law or Company policy.





The taking of any such retaliation by any colleague, officer or director is grounds for disciplinary action.

## **10. Monitoring**

The Global Compliance Department, and other personnel with compliance monitoring responsibilities, regularly monitors the Company's activities to assure compliance with the Comprehensive Compliance Program. Monitoring activities are risk-based and may include regular reviews of financial and other records of the Company related to interactions with healthcare professionals, reviews of sample distribution and reporting and monitoring of colleague training participation.

Monitoring results, corrective actions and follow-up are reported regularly to the Compliance Committee, the Audit and Compliance Committee of the Board of Directors, and to management.

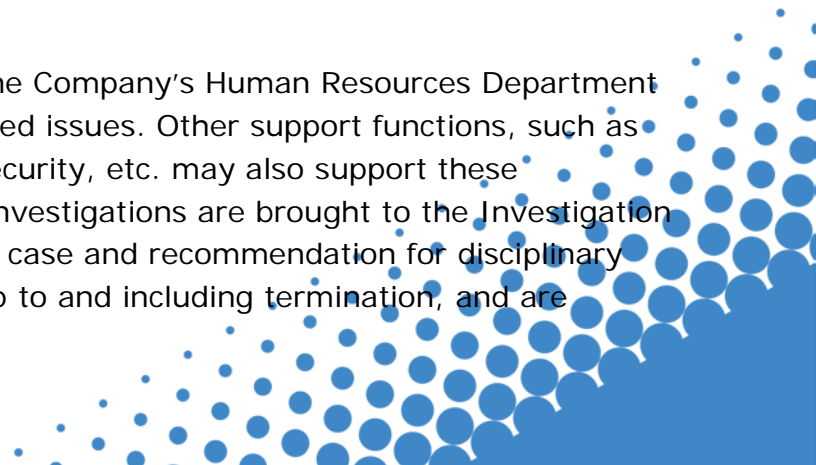
## **11. Auditing**


The Company's Corporate Audit Department, and other personnel with auditing responsibilities, regularly audits the Company's activities. Global Compliance collaborates with Corporate Audit on their risk assessment and the selection and prioritization of compliance related audits and often partners with Corporate Audit on the execution of select audits. Audit activities may include completion of annual risk survey and targeted audit plan.

Auditing results, corrective actions and follow-up are reported regularly to the Compliance Committee, the Audit and Compliance Committee of the Board of Directors, and to management.

## **12. Investigation: Disciplinary Action**

The Global Compliance Department and the Company's Human Resources Department oversee investigations of compliance-related issues. Other support functions, such as Legal, Finance, Corporate Audit, Global Security, etc. may also support these investigations as determined necessary. Investigations are brought to the Investigation Review Committee (IRC) for review of the case and recommendation for disciplinary action, which can range from warnings, up to and including termination, and are





determined on a case-by-case basis based upon the nature and severity of the violation. The business owns the final decision on disciplinary action based upon the IRC's recommendations.


Allergan maintains a dedicated case management system. The following documentation is maintained in Allergan's case management system:

- Hotline records or other records related to the initial concern / allegation;
- Investigative notes and plans;
- Documentation / evidence including emails, documents, recordings (audio and video), data, spreadsheets;
- Final Investigation Summary or Report; and
- Record of disciplinary outcomes and corrective action, as required.

### **13. Availability of Program: Annual Declaration of Compliance**

A copy of this Comprehensive Compliance Program can be downloaded from the Company website and is also made available to any interested person.

In accordance with Section 119402(e) of the California Health & Safety Code, the Company will post an Annual Declaration of Compliance on its website each calendar year. Requests for copies of this Program and the Annual Declaration of Compliance (upon posting) may be made by calling the Allergan Integrity Action Line at 1-888-645-0090.





## **Allergan plc - Annual Declaration of Compliance**

As part of Allergan's continuing commitment to maintaining the highest standards of business ethics and conduct, Allergan has posted a Comprehensive Compliance Program (CCP), as required by California Law. Allergan declares, as required by section 119402(e) of the California Health and Safety Code, that to the best of its knowledge it is, in all material respects, in substantial compliance with its CCP and the requirements of the California Health and Safety Code sections §§119400-119402. By making this declaration, Allergan does not claim that in all circumstances it can prevent individual colleagues from engaging in conduct that deviates from, or is in conflict with, the Program. However, as described above, the Company has established procedures to identify potential violations and to address inappropriate conduct as necessary.

Copies of this declaration and the Comprehensive Compliance Program can be downloaded from the Company website. Requests for copies can also be obtained by calling the Allergan Integrity Action Line at 1-888-645-0090.

Allergan plc

February 20, 2019

