
Introduction

Stallergenes Greer is committed to maintaining the highest ethical standards in conducting its business and adhering to all applicable laws, regulations, and guidelines. In furtherance of that commitment, Stallergenes Greer has implemented a comprehensive compliance program (“CCP”) for its U.S. operations which is based on guidance from the U.S. Department of Health & Human Services Office of Inspector General, and the *PhRMA Code on Interactions with Healthcare Professionals*. Stallergenes Greer reassesses, modifies, and enhances its CCP on an ongoing basis. The central elements of the CCP are described below.

Compliance Officer and Compliance Committee

Stallergenes Greer has designated a Compliance Officer who is responsible for overseeing the administration, implementation, and monitoring of the CCP, and has the authority to make compliance-related decisions and changes within the company. The Compliance Officer reports directly to the Stallergenes Greer Chief Executive Officer and Board of Directors.

Stallergenes Greer has established a Compliance Committee that is responsible for assisting in the oversight of the CCP and providing guidance and support to the Compliance Officer. The Compliance Committee reports to the Board of Directors regarding the status of the CCP.

Written Policies and Procedures

Stallergenes Greer’s CCP includes a Code of Business Conduct and Ethics, as well as policies and procedures that provide direction to company employees on ethical and compliant behavior. Stallergenes Greer expects its employees to comply with its Code of Business Conduct and Ethics, policies and procedures, and all applicable laws, regulations, and guidelines. Employees must annually acknowledge their responsibility and commitment to conduct Stallergenes Greer’s business consistent with these standards.

In accordance with California Health and Safety Code §§ 119400–119402 Stallergenes Greer has established an annual spending limit of \$2,000 for various educational items and promotional activities provided to or directed at an individual California medical or health professional.

Training and Education

Stallergenes Greer has developed and is enhancing its training program for employees regarding obligations and responsibilities under the CCP.

Lines of Communication

Stallergenes Greer promotes an environment of open communication, including questions or concerns regarding the CCP. Employees must report any activity or individual that is suspect or in violation of the CCP to their manager, the Compliance Officer, or through use of the Compliance Hotline by calling (844) 990-0002, or emailing reports@lighthouse-services.com. The Compliance Hotline is available 24 hours a day, 7 days a week and allows for confidential, anonymous reporting. Stallergenes Greer does not tolerate retaliation against employees who make reports in good faith.

Auditing and Monitoring

Stallergenes Greer’s CCP includes activities designed to audit and monitor compliance with Stallergenes Greer’s policies and procedures. The Compliance Officer oversees monitoring and auditing through use of an audit plan, which includes internal and external auditing activities. The Compliance Officer works with relevant resources to review audit reports and ensure the execution of appropriate responses.

Investigations, Corrective Actions, and Disciplinary Policies

Stallergenes Greer promptly and thoroughly investigates any reports of suspect or noncompliant conduct made in good faith. The CCP includes disciplinary actions as well as corrective and preventive actions to be implemented as appropriate upon determination that noncompliant conduct has occurred. Each situation is evaluated and handled on a case-by-case basis, and based on the severity of the circumstances, the disciplinary and corrective actions may vary. If disciplinary action is warranted, subject to local law, it may range anywhere from a warning to termination of employment. Stallergenes Greer also implements corrective and preventive actions, as appropriate. Corrective and preventive actions may include, but are not limited to, editing compliance policies and procedures, increasing auditing and monitoring, and revising the training program.

Please call (617) 225-8048 for a copy of Stallergenes Greer's CCP or declaration of compliance.