

California Compliance Program Law

For purposes of compliance with the requirements of California Health and Safety Code, §§ 119400-119402 (effective July 1, 2005) (hereinafter “California Compliance Program Law”), AstraZeneca has established, as part of its comprehensive compliance program, an annual dollar limit concerning appropriate items covered by the California law (“Covered Items”) that are provided to individual California medical and healthcare professionals as part of AstraZeneca’s interactions with these professionals to enhance the practice of medicine and benefit patient care. Some examples of these Covered Items include educational items, such as medical textbooks, or modest meals provided in connection with AstraZeneca’s efforts to advance the professionals’ understanding of the efficacy, safety, and benefits of AstraZeneca’s products. AstraZeneca’s annual dollar limit is \$1800 per individual healthcare professional.

This limit is a maximum amount: it is not an average. Because this limit is a part of AstraZeneca’s compliance program, and because AstraZeneca’s compliance program, by its very nature, must remain dynamic in order to be effective, this annual limit may be revised based on a variety of factors. This limit reflects the breadth of products that AstraZeneca offers and the broad range of healthcare professionals with whom AstraZeneca representatives may interact. AstraZeneca markets various products for treatment options in these diverse therapeutic areas: (1) Cardiovascular; (2) Gastrointestinal; (3) Neuroscience; (4) Oncology; (5) Respiratory; and (6) Infection. Because some healthcare professionals may treat different patients with a variety of conditions in the therapeutic areas listed above, situations may arise in which certain healthcare professionals interact with multiple company personnel.

Consistent with AstraZeneca’s good faith understanding of the California Compliance Program law, AstraZeneca excludes certain items and payments from its coverage. AstraZeneca’s annual dollar limit, as of July 1, 2009 does not include the value of:

- Drug samples provided to individual healthcare professionals intended for free distribution to patients.
- Financial support of independent education, including continuing medical educational forums.
- Financial support for health education scholarships.
- Payments for legitimate professional services, including professional speaking, advising, consulting, training or market research services, that are based on the fair market value of the services provided.
- Educational items provided to physicians to give to their patients to enhance patients’ understanding or management of a disease state or disorder (items such as patient educational brochures, instruction sheets, and patient self-assessment tools to track medical information).

Annual Declaration for Purposes of California Health & Safety Code, §§ 119400-119402

AstraZeneca declares, to the best of its knowledge and based upon a good faith understanding of the applicable statutory requirements, that it has established a Comprehensive Compliance Program that encompasses the compliance program requirements stated in California Health & Safety Code, §§ 119400-119402. As of July 1, 2009, AstraZeneca declares that it is, in all material respects, in compliance with the Comprehensive Compliance Program as described above and California Health & Safety Code, §§ 119400-119402. Because compliance is a dynamic concept, AstraZeneca will assess the overall effectiveness of the elements of its Comprehensive Compliance Program at least annually, and, as part of its assessment, AstraZeneca may modify aspects of its program to enhance the program’s effectiveness. By declaring that it is in compliance with its Comprehensive Compliance Program, AstraZeneca is asserting that its program is reasonably designed to prevent or detect and address misconduct. Copies of this summary of the U.S. Compliance Program and declaration may be obtained by contacting AstraZeneca at the following toll-free number: 800-236-9933.