



900 Northbrook Drive, Suite 200
Trevose, PA 19053

Strongbridge Biopharma Statement regarding compliance with California Health and Safety Code § 119402

NOTICE: This information is provided pursuant to the requirements of California Health & Safety Code, Section 119402, which requires pharmaceutical companies doing business in California to make available their Compliance Program and also to provide annual written declaration of their adherence to the requirements of the Compliance Program.

California Health & Safety Code, Section 119402, ("California Compliance Law") requires pharmaceutical companies to adopt a "Comprehensive Compliance Program" in accordance with the requirements set forth in the April 2003 "Compliance Program Guidance for Pharmaceutical Manufacturers" ("OIG Guidance") published by the United States Department of Health and Human Services Office of Inspector General ("OIG"). Further, the California Compliance Law requires manufacturers to include in their Comprehensive Compliance Program policies for compliance with the Pharmaceutical Research and Manufacturers of America ("PhRMA") "Code on Interactions with Health Care Professionals" ("PhRMA Code"). The California Compliance Law further states that companies shall institute limits on gifts and incentives to health care professionals and also requires that companies declare annually, in writing, their compliance with their Comprehensive Compliance Program as well as the requirements of the California Compliance Code.

Strongbridge Biopharma plc ("Strongbridge" or the "Company") has established a Comprehensive Compliance Program in accordance with the OIG Guidance and also has put in place policies to foster compliance with the requirements of the PhRMA Code. In addition, as part of its Comprehensive Compliance Program, Strongbridge has established a specific annual aggregate dollar limit of \$2,000 on gifts, promotional materials, or items or activities that Strongbridge may provide to an individual medical or healthcare professional in California. This limit may be revised by Strongbridge as needed, and if changed, will be published within a reasonable time. The foregoing limit does not represent an average or typical amount for medical or health care professionals. This annual aggregate limit is based on an estimate of the maximum value of gifts, promotional materials and other items or activities as defined herein that a California medical or health care professional may receive in one year. This limit does not include samples or education materials provided for patient use, continuing education support, or payments for bona fide professional services.

Annual Declaration (July 2020)

As stated in its Compliance Program, the Company is committed to conducting its business ethically and in compliance with applicable laws. To the best of its knowledge and based on a good faith understanding of the applicable statutory requirements, the Company has established a Comprehensive Compliance Program that meets the requirements set forth in California Health & Safety Code, Sections 119400-119402. Strongbridge's Comprehensive Compliance Program is tailored to the size, organizational structure and resources of the Company and has been developed to meet the issues addressed by the above-referenced California Law.

By making this declaration, Strongbridge is not asserting that it can prevent individual employees from improper conduct and/or otherwise violating the standards set forth in its Comprehensive Compliance Program. As recognized by the OIG Compliance Program Guidance, even an effective compliance program cannot eliminate the possibility that one or more individual employee engages in conduct that would be considered improper. In the event that Strongbridge becomes aware of a potential violation of law or company policy, Strongbridge has established procedures investigate the issue, and take corrective and disciplinary action as necessary. As of the date of this declaration, such procedures are in place and will be reassessed periodically and no less frequently than on an annual basis. Thus, subject to the limitations described above, the Company declares that, based upon its current tracking and monitoring systems, the Company is, in all material respects, in compliance with the Compliance Program and with the established annual spending limits.

For a written copy of the Compliance Program description or this Declaration, call 1-610-263-2260.