

Greenwich Biosciences California Declaration of Compliance
Dated January 2019

NOTICE: This information is provided pursuant to the requirements of California Health & Safety Code § 119402 (S.B. 1765), which requires certain pharmaceutical and medical device companies doing business in California to make available their program for compliance with applicable federal and state laws and industry standards regulating the marketing and promotion of their products.

Greenwich Biosciences and its parent company have created a comprehensive compliance program in accordance with the April 2003 “Compliance Program Guidance for Pharmaceutical Manufacturers” from the United States Department of Health & Human Services Office of Inspector General (“OIG Guidance”) as well as all other applicable federal and state laws and regulations, which we have branded as I-CARE.

The I-CARE program is our global principles-based approach to corporate ethics and compliance, led by the Global Chief Compliance Officer. The I-CARE Code of Business Conduct & Ethics (“The Code”) provides guidance to our business standards and practices. The program is designed to monitor, review, and take action to prevent, detect, and respond to threats that may impact the company’s integrity and long-term sustainability which is available upon request at the information provided below.

In accordance with the Code, other relevant policies and guidance, the PhRMA Code and subject to any state law prohibition or limitation, the Company may allow for modest and occasional medically relevant patient education items to be given to healthcare professionals. Where states like California have required it, the Company has implemented a \$5000 per healthcare professional annual limit on meals, promotional materials or other items from the Company. This limit may be revised from time to time by the Company in its sole discretion, in which case the revised limit will be published in this section of the Company website within a reasonable time of the revision. This limit represents an expenditure cap and not a goal or an average expenditure amount. These annual limits do not include the following: financial support for CME programs or health educational scholarships, payments within FMV for legitimate professional services, or research related payments.

The I-CARE team can be reached via email at: i-care@gwpharm.com and phone at 800-461-9330.