California Compliance Declaration 2026

This information is provided pursuant to the requirements of California Health & Safety Code § 119402, which requires 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.

Introduction

Photocure Inc has established a compliance program designed to materially comply with applicable federal and state laws and industry standards relating to the marketing and promotion of our products. This program aligns with the "Compliance Program Guidance for Pharmaceutical Manufacturers," published by the Office of Inspector General of the U.S. Department of Health and Human Services (OIG Guide). Our compliance program is based on the seven elements recommended by the OIG Guide.

Overview of Compliance Program

1. **Written Policies and Procedures**

We have developed written policies to ensure compliance with the laws and regulations governing the marketing and promotion of our products. These policies align with recognized industry codes of conduct, such as the PhRMA Code. Key policies include:

2. **Annual Dollar Limit**

We have established an annual limit of $2000 for meals, educational items, and practice-related items provided to California healthcare professionals, in compliance with Cal. Health & Safety Code § 119402.

3. **Compliance Officer**

We have appointed a Compliance Officer (global role) empowered to exercise independent judgment and oversee our compliance program. This officer has access to senior management to ensure effective compliance oversight.

4. **Training**

Our employees receive annual training on our compliance policies and the consequences of non-compliance. This training is designed to ensure all employees understand and adhere to our compliance standards.

5. **Communication**

We encourage open communication regarding compliance concerns. Employees can report concerns to their manager, the Human Resources Department, the Compliance Officer, or through our confidential compliance hotline.

6. **Auditing and Monitoring**

We periodically audit our compliance with policies and procedures. These audits help us identify and address any compliance issues promptly.

7. **Enforcement and Disciplinary Guidelines**

We take disciplinary action in response to violations of our compliance policies. Investigations are conducted fairly to ensure consistent application of our standards.

8. **Responses to Detected Problems**

We respond promptly to potential violations of our compliance program. Corrective actions may include policy improvements, additional training, or disciplinary measures to prevent future violations.

Declaration for California Compliance Law

As part of our commitment to compliance, we have developed a Comprehensive Compliance Program that adheres to applicable federal and state laws and industry standards. To the best of our knowledge, as of the date of this declaration, Photocure Inc is in compliance with our Comprehensive Compliance Program and California Health & Safety Code §§ 119400-119402.

Annual Declaration 2025

To the best of our knowledge, as of January 1, 2026, Photocure Inc is in compliance with its Compliance Program and the requirements of the California Health & Safety Code §§ 119400-119402. It is Photocure Incs expectation that all employees and contractors comply with its compliance program and all procedures that support this program.

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