



California Declaration of Comprehensive Compliance Program

California Health and Safety Code §119402

To the extent that Avadel interacts with healthcare professionals (HCPs), such relationships are intended to benefit patients and enhance the practice of medicine. Informational presentations and discussions by Avadel representatives and others speaking on behalf of Avadel are intended to provide valuable scientific and educational benefits. In conjunction with such presentations and discussions, Avadel employees may offer occasional meals and educational items in accordance with the PhRMA Code on Interactions with Healthcare Professionals.

The California Health and Safety Code requires pharmaceutical companies to maintain a Comprehensive Compliance Program (CCP) relating to their interactions with HCPs and to:

- Establish "a specific annual dollar limit on gifts, promotional materials, or items or activities that the pharmaceutical company may give or otherwise provide to HCPs";
- Make an annual written declaration that it is in compliance with its CCP and applicable law;
- Make its compliance program and its annual declaration of compliance available to the public on its website; and
- Provide a toll-free number to obtain a copy of the CCP and the annual written declaration.

For HCPs in California, Avadel has declared a specific annual dollar limit of \$2,000 per HCP for the provision of items and activities in accordance with the PhRMA Code. This limit is set by Avadel and revisited at least annually.

California Declaration of Compliance – 2025

Avadel has established the CCP in accordance with relevant laws, considering our size, organization, activities, and operations, with which it intends to comply in so far as it remains applicable to Avadel's organization. Recognizing no compliance program can guarantee prevention of any and all violations, the goals of the CCP are to deter and prevent violations as well as identify and respond to any violations as promptly as possible and implement appropriate corrective actions. Avadel will continue to evaluate and assess our CCP on an ongoing basis to adjust to new circumstances and risks and to maintain and improve the strength of the CCP.

To the best of our knowledge, in 2025, Avadel is in material compliance with our CCP and the requirements of the California Health & Safety Code.

To obtain a copy of the CCP and this annual written declaration, please contact 1 800-893-5516.