



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, if any, 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 health care professionals (as provided above) 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 a health care professional";
- 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 (see below); and
- Provide a toll-free number to obtain a copy of the CCP and the annual written declaration. That number is 1 800-893-5516.

For medical or healthcare professionals in California, Avadel has declared a specific annual dollar limit of \$1,500 per HCP for educational items and activities in accordance with the PhRMA Code. Avadel expects that few, if any, California HCPs will approach this limit. This spending limit is set by Avadel and revisited at least annually.

California Declaration of Compliance – 2023

Avadel has established a Comprehensive Compliance Program in accordance with relevant laws and with consideration to our size, organization 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 are to deter and minimize violations as well as identify any violations as promptly as possible and efficiently implement corrective actions thereafter. Since compliance is a dynamic process, Avadel will continue to evaluate and assess our Comprehensive Compliance Program on an ongoing basis to adjust to new circumstances and to maintain and improve the strength of the Program.

To the best of our knowledge, in 2023, Avadel is in material compliance with our Comprehensive Compliance Program and the requirements of the California Health & Safety Code.