



Commitment to Ethics and Compliance

Katena Products, Inc. (“Katena” or “our”) are committed to high standards of ethical conduct and regulatory compliance. We have established a Comprehensive Compliance Program that, to the best of our knowledge, is reasonably designed to prevent and detect violations of our Code of Conduct, other internal standards and applicable federal and state healthcare laws and regulations. Our Comprehensive Compliance Program, which is tailored to the size, organizational structure, operational activities and resources of Katena, is designed to help meet compliance goals consistent with our corporate ethics and with the statutory requirements of California Health and Safety Code §§119400-119402.

The Comprehensive Compliance Program recognizes that compliance with healthcare laws is dynamic. Accordingly, we may revise the Comprehensive Compliance Program to reflect changes to applicable laws or regulations, company operations, the Compliance Program Guidance for Pharmaceutical Manufacturers published by the Office of Inspector General for the U.S. Department of Health and Human Services, the PhRMA Code on Interactions with Health Care Professionals, the AdvaMed Code of Ethics on Interactions with Health Professionals, and other applicable materials. The current version of the Comprehensive Compliance Program may be viewed by clicking here www.katena.com. As a key part of the Comprehensive Compliance Program, Katena has implemented policies and procedures on marketing practices and interactions with health care professionals, including an annual dollar spending limit of \$1,500 per individual healthcare professional.

We believe Katena is in compliance with its Comprehensive Compliance Program and the statutory requirements of California Health and Safety Code §§119400-119402. This declaration is made as of August 1, 2014.

Please feel free to contact us at 1-800-225-1195 or 1-800-535-3545 to obtain a written copy of this declaration or our Comprehensive Compliance Program.