

STATEMENT ON COMPLIANCE WITH CALIFORNIA HEALTH AND SAFETY CODE CHAPTER 8

January 1, 2019

In accordance with California Health and Safety Code Chapter 8 - §§119400-119402 ("Chapter 8"), United Medical Systems DE, Inc. and any affiliates subject to Chapter 8 ("UMS") are, to knowledge and in all material respects, in compliance with Chapter 8 and a Comprehensive Compliance Program ("CCP") that satisfies the requirements of Chapter 8, based on our good faith understanding of the statutory provisions as they may apply to a medical device manufacturer.

Consistent with the Department of Health and Human Services Office of the Inspector General Compliance Program Guidance for Pharmaceutical Manufacturers ("HHS-OIG Guidance"), UMS has tailored its CCP to the nature of its business as a medical device manufacturer. While Chapter 8 makes reference to compliance with the Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals ("PhRMA Code"), UMS is an applicable manufacturer of medical devices rather than pharmaceutical products. Therefore, UMS determined that it was more appropriate for the Company to instead adopt policies and procedures consistent with the AdvaMed Code of Ethics on Interactions with Healthcare Professionals ("AdvaMed Code") which, although substantially similar to the PhRMA Code, recognizes significant differences applicable to the medical device industry.

To obtain a print version of our CCP or this declaration, please contact the Compliance Officer via: phone by calling 877-767-5024, extension 81 or by e-mail to nerlenbach@ums-usa.com.