

DECLARATION OF COMPLIANCE WITH CALIFORNIA HEALTH AND SAFETY CODE § § 119400–119402

Whitzard Medical has adopted a Compliance Program that reflects our plan to promote compliance in accordance with the Compliance Program guidance published by the United States Department of Health and Human Services. Whitzard Medical's primary business is the manufacturing and sale of CPAP (Continuous Positive Airway Pressure) devices. Our compliance program reflects our adoption of policies and procedures appropriate to our company, including the AdvaMed Code of Ethics on Interactions with Healthcare Professionals, which is substantially similar to the PhRMA Code referenced in California Health and Safety Code § 119400. To the best of its knowledge and based on a good faith understanding of the applicable statutory requirements, our Compliance Program meets the requirements of California Health and Safety Code § § 119400-119402 as of February 27, 2019.

The OIG has recognized in its Guidance that the implementation of an effective compliance program may not entirely eliminate improper conduct from the operations of a manufacturer. By making this declaration, Whitzard Medical is not asserting that in all circumstances it can prevent individual employees from conduct that deviates from its policies. Whitzard Medical expects employees to comply with its Compliance Program and has made a good faith effort to enforce its Compliance Program, prevent violations, and address any inappropriate conduct that may occur.