

CALIFORNIA DECLARATION OF COMPLIANCE

California Health & Safety Code, Sections 119400 – 119402, (“California Compliance Law”) requires pharmaceutical companies to adopt a compliance Plan that is in accordance with (1) the United States Department of Health and Human Services Office of Inspector General’s April 2003 guidance entitled “Compliance Plan Guidance for Pharmaceutical Manufacturers,” (OIG Guidance), and (2) the Pharmaceutical Research and Manufacturers of America “Code on Interactions with Health Care Professionals” (PhRMA Code), effective as of July 1, 2002, and as amended in January 2009 and September 2019.

Ironwood Pharmaceuticals, Inc., is committed to complying with all applicable laws, regulations and industry standards. Ironwood has developed a Comprehensive Compliance Plan in accordance with the OIG Guidance and that contains policies consistent with the PhRMA Code.

The Ironwood Compliance Plan includes numerous policies and procedures and is continually assessed and evaluated in an effort to ensure consistency compliance with applicable laws, rules, regulations and industry and agency guidance. It is designed to prevent, detect and remediate violations of law, regulations and company policies, as well as to promote an ethical culture that helps guide our interactions with healthcare professionals and healthcare entities. In the event that Ironwood becomes aware of any potential or actual violations of policy or law, Ironwood will investigate such matter and, if necessary based on the results of the investigation, will undertake appropriate corrective and preventive actions, all done in accordance with the Ironwood Compliance Plan.

As part of the Ironwood Compliance Plan, the company has established a specific annual aggregate dollar limit of \$2,000 on gifts, items or activities Ironwood may give or otherwise provide to an individual medical or healthcare professional in California on an annual basis. This limit may be revised from time to time by Ironwood in its sole discretion, in which case the revised limit will be published in this section of the Ironwood website within a reasonable period of time following revision. This limit represents an expenditure cap and not a goal or an average

expenditure amount. Historically, expenditures for such items have been substantially less than this limit for most healthcare professionals with whom Ironwood interacts. The Company has established a monitoring and auditing system designed to ensure compliance with, among other things, the annual spending limits in California.

The annual limit specified above does not include expenditures pertaining to the following:

- Drug samples given to physicians and healthcare professionals;
- Financial support for continuing medical education Plans;
- Financial support for health educational scholarships;
- Payments for legitimate professional services, and any meals or expenses associated with the provision of such services; and
- Items of nominal value with a retail value of less than \$10 (e.g., visual aids, reprints of medical journal articles)
- Patient educational materials provided to patients by their physician with the purpose of educating the patient or enhancing the patient's understanding or management of the condition

Based on a good faith understanding of the requirements of Section 119402 of the California Health & Safety Code, Ironwood hereby declares that, to the best of its knowledge, its Comprehensive Compliance Plan addresses the California statutory requirements for inclusion of policies addressing the OIG Guidance, the PhMRA Code, and limits on gifts and incentives to health professionals. Subject to the above, Ironwood also hereby declares that it is, in all material respects, in compliance with its Comprehensive Compliance Plan as of January 1, 2020.

For a written copy of the Compliance Plan description or this declaration, please call 1-844-374-4793.