

**Ultragenyx**  
**Comprehensive Compliance Program**  
(As required by the California Health & Safety Code  
sections 119400-119402)

Ultragenyx is committed to bringing to market novel products for the treatment of rare and ultra-rare diseases, with a focus on serious, debilitating genetic diseases. We exercise that commitment by maintaining the highest standards of honest and ethical business conduct. At Ultragenyx, integrity and reputation depend on the honesty, transparency, fairness and integrity of each person associated with us.

Our Global Code of Conduct (“Code”) states the business practices and principles of behavior and our commitment to them. The Code is available to the public through its posting on this website.

To conduct our business with high ethics and integrity, Ultragenyx has established a comprehensive compliance program. This program has been developed in accordance with the laws applicable to our industry, the “Program Guidance for Pharmaceutical Manufacturers” published by the Office of the Inspector General of the U.S. Department of Health and Human Services and the Code of Interactions with Healthcare Professionals of the Pharmaceutical Research and Manufacturers of America (PhRMA).

Consistent with the OIG Guidance Ultragenyx’s compliance program includes:

- A compliance officer and compliance committee responsible for developing, operating and monitoring the compliance program and with authority to report directly to the board of directors and the company’s chief executive officer.
- Written standards of conduct, policies, and practices that documents the company’s commitment to compliance and requirements to strictly follow fraud and abuse laws, including:
  - The integrity of company-generated data that is used for government reimbursement purposes.
  - Prohibition of kickbacks and illegal remuneration to any persons to gain business.
  - Promotion and product information that are truthful and not misleading.
- Easy to understand, effective and readily available education and training programs for all employees.
- Lines of communication between the compliance officer and all employees, including a process to receive complaints and ask questions (a hotline). Our policies and practices protect the anonymity of employees who make complaints and prohibit retaliation.
- A developing audit and monitoring program to identify and address of risk.
- Enforcement of compliance obligations through guidelines that include disciplinary action for noncompliance.

- Mechanisms to promptly and properly investigate and respond to reports of noncompliance, including processes to initiate corrective measures and to report offenses to the relevant government authorities where appropriate.

In addition, Ultragenyx has adopted policies and practices consistent with the PhRMA Code that govern the interactions with healthcare professionals. These policies including appropriate:

- Support for medical education, as well as the use of healthcare professionals to provide services to the Company as researchers, consultants and speakers.
- Provision of business courtesies.
- Making of grants and charitable contributions so that such funds are not conditioned, express or implied, on any agreement to prescribe, purchase, recommend, influence or provide favorable formulary status for any Ultragenyx product.
- Promotion of Ultragenyx products in compliance with the U.S. Food and Drug Administration's regulatory framework regarding promotion of pharmaceutical products.

## **CALIFORNIA 2020 ANNUAL DECLARATION OF COMPLIANCE**

As required by California Health & Safety Code section 119402, with specific reference to the provision of "gifts, promotional material, or items or activities" that a pharmaceutical company may provide to an individual medical or healthcare professional, Ultragenyx established an aggregate dollar limit of \$2,000.00 per year on applicable gifts, promotional material, or items or activities for each medical or healthcare professional in the State of California. The dollar limit is a maximum only and may be revised by Ultragenyx from time to time.

To the best of our knowledge, as of July 1, 2020 Ultragenyx is in material compliance with its Comprehensive Compliance Program and the requirements of the California Health and Safety Code §§119400-119402.

Ultragenyx is committed to an ongoing assessment of ethical conduct and compliance with applicable laws. Ultragenyx's Comprehensive Compliance Program is designed, implemented, and enforced with the goal of preventing and detecting unlawful and unethical behavior. A description of Ultragenyx's Compliance Program, including written declaration and certification of compliance with California Health and Safety Code §§119400-119402 can be obtained by calling Compliance Counsel, Benjamin Ehrhart, at 415-231-1888 or via email at [compliance@ultragenyx.com](mailto:compliance@ultragenyx.com).