



## **COMPREHENSIVE COMPLIANCE PROGRAM & DECLARATION OF COMPLIANCE**

Rigel Pharmaceuticals, Inc. (Rigel) is committed to establishing and maintaining a comprehensive and effective compliance program in accordance with California Health & Safety Code §§ 119400 – 119402, Connecticut General Statutes Ch. 417 § 21a-70e, Nevada Revised Statute 639.570, Massachusetts General Laws Ch. 111N, § 4, the Office of Inspector General, U.S. Department of Health and Human Services "Compliance Program Guidance for Pharmaceutical Manufacturers" (OIG Guidance), and the Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals (PhRMA Code).

Our Compliance Program reflects our unwavering commitment to the highest standards of corporate conduct and integrity. Rigel expects all employees, executive officers and directors to comply with applicable laws and regulations, the Rigel Code of Conduct, and Rigel's supporting policies and procedures. If Rigel becomes aware of violations of law or Rigel policy, we will investigate the matter and, if appropriate, take disciplinary action and implement corrective measures to prevent future violations.

### **COMPREHENSIVE COMPLIANCE PROGRAM DESCRIPTION**

The Rigel Compliance Program described below contains policies and procedures to address risk areas identified in the OIG Guidance and the PhRMA Code. We believe that our Compliance Program is scalable to address the size, organizational structure and operations of our company. As recommended by the OIG Guidance, our Compliance Program is regularly reviewed and evaluated to ensure it continues to meet the evolving needs of our company.

### **COMPLIANCE PROGRAM OVERVIEW**

#### **1. Leadership and Structure**

- **Chief Compliance Officer**. Rigel has appointed a Chief Compliance Officer who is charged with establishing, operating and monitoring the Compliance Program, including oversight of healthcare compliance. The Chief Compliance Officer has direct access to the Rigel Board of Directors and senior management, and provides regular reports on the status of the Compliance Program.
- **Compliance Committee**. Rigel has formed a Compliance Committee to advise and assist the Chief Compliance Officer in the implementation of the Compliance Program. The Compliance Committee is comprised of senior leadership from functional units across the company. It meets on a regular



basis to assess operational risks and potential compliance concerns facing the company and to identify areas of enhancement for the Compliance Program.

## **2. Written standards**

Rigel has established written policies and procedures to ensure compliance with OIG Guidance and PhRMA Code, including the Rigel Code of Conduct and other complimentary policies that outline the company's commitment to compliance and corporate responsibility. The standards set forth in the policies apply to all Rigel employees and adherence to company policies is a condition of employment.

Rigel does not permit gifts, promotional materials, items, or activities prohibited by the PhRMA Code, OIG Guidance, FDA regulations, or any other federal or state law. For items and activities that are not prohibited, Rigel has set an annual aggregate spending limit of \$2,500 per healthcare professional (HCP). As the size of the development stage of the company and the size and scope of our product portfolio changes, Rigel may revise its annual aggregate limit. In tracking its annual aggregate spending limit, Rigel excludes the following items that are exempt under California law: (1) drug samples given to HCPs for the free distribution to patients; (2) financial support for continuing medical education forums; (3) financial support for health educational scholarships; and (4) payments made at fair market value for legitimate professional services provided by HCPs, such as clinical and consulting arrangements.

## **3. Education and Training**

All employees are required to receive compliance training applicable to their job function and responsibilities, which includes training on the Compliance Program and Rigel policies. In addition, further specialized training may be provided where a need for further training has been identified. Annual compliance training is required of all employees who engage in or support commercial activities. Rigel regularly reviews and updates its training programs to help ensure it continues to meet the educational needs of its employees.

## **4. Internal Lines of Communication**

Rigel is committed to open dialogue between management and employees. Our goal is to foster a "speak up" culture where employees may ask questions or report potential instances of inappropriate activity without fear of retribution. We have established a confidential and anonymous Rigel Code of Conduct Hotline that is available 24 hours a day, seven days a week for reporting known or suspected violations of Rigel policies, asking question, and raising concerns: (650) 624-1127.



## **5. Auditing and Monitoring**

Rigel recognizes that a comprehensive auditing and monitoring plan is critical to maintaining the effectiveness of its Compliance Program. The subject of our auditing and monitoring assessments, as well as the extent and frequency of our reviews, may vary according to a variety of factors, including new regulatory requirements, changes in business practices and other considerations. As appropriate, auditing and monitoring results will be reported to the Legal Department, the Compliance Committee, and senior management to help guide the risk-assessment process.

## **6. Responding to Potential Violations**

The purpose of our Compliance Program is to prevent and detect violations of law or company policy. As the OIG Guidance recognizes, however, the implementation of such a program cannot guarantee that improper employee conduct will be entirely eliminated. Nonetheless, it is Rigel's expectation that employees will comply with the Compliance Program, and the policies established in support of such program. In the event that Rigel becomes aware of violations of law or company policy, we will promptly investigate the matter and, where appropriate, take disciplinary action and implement corrective measures to address potential gaps and prevent future violations. Employees who violate Rigel policies and procedures and/or applicable state and federal laws may be subject to disciplinary action, up to and including termination, as determined on a case-by-case basis.

## **7. Corrective Action Procedures**

A key element of the Compliance Program is to provide clear disciplinary policies that set out the consequences of violating the law or company policy. After investigation of a reported or detected issue, the company will assess whether disciplinary action is appropriate, and whether a violation is in part due to gaps in our policies, practices, training or internal controls, and take action to prevent future violations.

## **8. Rigel Declaration of Compliance**

Rigel Pharmaceuticals, Inc. declares, in good faith and to the best of its knowledge, that as of January 10, 2020, it is in substantial compliance with its Comprehensive Compliance Program, which incorporates the principles articulated in the OIG Guidance, the PhRMA Code, and the requirements of California Health and Safety Code §§ 119400 – 119402.

## **CONTACT INFORMATION**

For a copy of this Comprehensive Compliance Program Policy, please call the Rigel Compliance Hotline: (650) 624-1127.