## **U** NOVARTIS

## State laws

In recent years, pharmaceutical marketing and promotion have been the subject of debate, with critics citing these activities as one of the main factors driving the cost of healthcare upwards. From an industry perspective, the PhRMA Code established guidelines for ethical relationships with healthcare professionals. From a federal perspective, OIG guidance called for significant changes in traditional marketing and sales practices. Numerous states have enacted laws that directly impact our various sales, marketing and pricing activities. Novartis Pharmaceuticals Corporation (NPC) strives to ensure that patients have access to medicines and continues to support activities that enhance the practice of medicine. In this regard, NPC is committed to timely adherence to all state laws that may affect the marketing of our products and our relationship with healthcare professionals.

NPC is dedicated to meeting all federal, state, and industry regulations and guidelines, and has established and maintains an effective compliance program to help foster a culture that promotes prevention, detection, and resolution of instances of problems.

Below you will find a description of the NPC Compliance Program as well as the NPC State-specific program elements related to California's Health and Safety Code §119402 and Vermont's Pharmaceutical Marketing Gift Disclosure Law 33 V.S.A. §2005.

- California Health and Safety Code §119402
- <u>California: NPC Declaration of Compliance</u>
- 2022 Annual Description of Comprehensive Compliance Program
- Read the Waste Sharps Management Plan (PDF 0.2 MB)
- Information on Price Disclosure Laws Vermont and Colorado

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