

TRICIDA

Tricida, Inc Comprehensive Compliance Program

Tricida, Inc (“Tricida”) is committed to operating an effective Compliance Program which is consistent with and effectuates the principles outlined in:

- The 2003 guidance issued by the Office of Inspector General, U.S. Department of Health and Human Services entitled, *Compliance Program Guidance for Pharmaceutical Manufacturers* (“OIG Guidance”);
- The current version of the *Code on Interactions with Healthcare Professionals* issued by the Pharmaceutical Research and Manufacturers of America (“PhRMA Code”); and
- Other laws and regulations and industry codes of practice which apply to our business.

The Tricida Compliance Program applies to our directors, corporate officers and employees and, in certain situations, our consultants, business partners, service providers and independent contractors (collectively, “Tricida Representatives”). The intent of the Compliance Program is to ensure that Tricida Representatives act responsibly and with a high standard of business ethics in their interactions with healthcare providers, patients, payers and other stakeholders in the healthcare system. In furtherance of this objective, the company has implemented a comprehensive set of corporate compliance policies, regular training initiatives, periodic monitoring and auditing activities, and various internal reporting mechanisms which facilitate the detection, prevention, reporting and resolution of actual or potential violations of our policies and applicable legal and regulatory requirements. The structure and components of our Compliance Program are reviewed periodically and updated as needed or as required by law.

Tricida has established an annual aggregate dollar limit of \$2,500 on gifts, promotional materials and items of value (including meals) that Tricida Representatives may give or otherwise provide to a California-licensed healthcare professional. Value is assessed from the perspective of the California-licensed HCP and is a cumulative total throughout the calendar year, regardless of whether the promotional materials or items of value (including meals) are provided by one or more Tricida Representatives. Consistent with California law, the limit excludes the fair market value of drug samples, financial support for continuing medical education programs, educational scholarships, and payments for legitimate professional services. In most cases, the amount spent per healthcare professional is substantially less than the cap amount. This limit is reviewed periodically by the company and may be revised from time to time.

Based on the foregoing, Tricida declares that, as of November 20, 2019, to the best of its knowledge and based on a good faith understanding of the relevant statutory requirements, our comprehensive compliance program satisfies the requirements of California Health and Safety Code §§ 119400 to 119402.

For questions about our Compliance Program, please call 1-888-Tricida or utilize our Compliance Hotline at 1-866-859-7652.