

Actelion Pharmaceuticals US, Inc.

ACTELION U.S. COMPREHENSIVE CORPORATE COMPLIANCE PROGRAM

Our Commitment to Corporate Compliance

At Actelion Pharmaceuticals US, Inc. (Actelion), we are committed to conducting our business in an ethical manner and in compliance with all applicable laws, rules and regulations. We value integrity, fairness, and honest and ethical conduct.

We have developed codes of conduct that embody our high ethical standards, and we are committed to operating our business, and conducting our relationships with patients, physicians and stockholders, accordingly. We ask and expect that our employees strictly adhere to these standards.

Our Comprehensive Corporate Compliance Program (“Compliance Program”)

Actelion is committed to establishing and maintaining an effective Compliance Program. The structure of the Actelion Compliance Program follows the seven compliance program elements outlined in the Office of Inspector General (“OIG”) *Compliance Program Guidance for Pharmaceutical Manufacturers*.

Actelion’s Compliance Program is outlined below. The program helps to guide us in our day-to-day and long-term activities. We intend to periodically reexamine the program to ensure it is efficient and effective. Accordingly, the Compliance Program may be amended or revised by Actelion from time to time.

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| 1. Written Standards of Conduct, Policies and Procedures | 4. Communications and Reporting |
| 2. Compliance Infrastructure | 5. Monitoring and Auditing |
| 3. Training and Education | 6. Disciplinary Guidelines |
| | 7. Corrective Action |

1. Written Standards of Conduct, Policies and Procedures

- Actelion Policy on Ethical Conduct: this policy helps to guide our daily operations and reflects the unique business and regulatory environment in which we operate.
- Policies (including but not limited to insider trading, anonymous reporting via hotline, product promotion and interactions with healthcare professionals)
- Standard Operating Procedures
- Colleague Manual
- **Total Annual Dollar Limit for Compliance with California Health & Safety Code**

Pursuant to the requirements of the California Health & Safety Code Sections 119400-119402, Actelion has established an annual limit of two thousand seven hundred dollars (\$2700) on gifts, promotional materials, or items or activities that Actelion may give or otherwise provide to an individual medical or health care professional in California. Exigent circumstances that may warrant a waiver of the limit would require the prior approval of the US Chief Compliance Officer and Executive Leadership Team.

2. Compliance Infrastructure

In addition to the roles played by our Board of Directors, and President, Actelion has a multi-level compliance structure that includes the following:

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| • Corporate Compliance Officer (Global) | • Compliance Committee |
| • Chief Compliance Officer (US) | • Global Corporate Compliance Office |
| • Compliance Champion (US) | • Medical Review Committee |
| | • Protocol Review Committee |

- Grant Review Committee

- Actelion Review Committee

3. Training and Education

Our training program includes:

- Training for new hires on general policies
- Position-specific training (e.g., healthcare compliance training for sales and marketing employees)
- Periodic supplemental training
- Certification by certain employees of compliance with policies
- Ongoing evaluation of changing legal and regulatory requirements, and development of new training as appropriate
- New training in response to needs identified through monitoring and auditing

4. Communicating and Reporting

We encourage all employees to express their concerns, and we provide several channels for communication:

- Compliance Hotline (24x7)
- Compliance web-based reporting system
- Open Door Policy
- Exit interviews

We expect employees, officers and directors to promptly report suspected, planned or actual violations of our directives and guidelines and/or laws which govern our activities. We encourage reports to be made to a supervisor, manager, or directly to the Compliance Officer. If these individuals are not available or if the reporter (including a person from outside the company) prefers, reports of violations may be made on an anonymous basis via Actelion's Compliance toll-free Hotline. This hotline is available 24 hours a day, 7 days a week by calling 1-888-373-8871. Employees also have the option to submit reports via a website www.actelionhotline.com and will be provided with a case number that they can use to track the status of their report.

We also encourage our employees and partners to ask questions about any activity where they are unclear about a potential violation or application of our Compliance Program. Questions may be posed through any of the established channels. Acts of retaliation or retribution against an employee or officer who in good faith reports a potential, suspected, planned or actual violation or application of our directives and guidelines and/or laws are not permitted.

5. Monitoring and Auditing

We monitor our regulated activities, confirming compliance with the Compliance Program and with the implementation of related directives and guidelines like:

- PhRMA Code and OIG Guidelines
- Good Clinical Practices (GCP)
- Sarbanes-Oxley ("SOX") and other securities laws and regulations
- Other applicable federal and state laws and regulations

6. Disciplinary Guidelines

Our disciplinary guidelines and procedures include, among other things:

- Periodic employee performance reviews that include compliance measurements for all employees
- Disciplinary action in response to violations of policies, laws or regulations
- Sanctions ranging from oral warnings up to and including termination

7. Corrective Action

We investigate reported compliance issues and concerns, and strive to take corrective action that may include:

- Appropriate sanctioning of the employees involved regardless of the individual's position within the organization
- Enhancements to our policies, practices or internal controls
- Development and implementation of new training programs to prevent future occurrences
- Establishment of mechanisms for continued monitoring