



California Transparency in Supply Chains Act of 2010

The California Transparency in Supply Chains Act of 2010 (SB 657) provides consumers with information about the efforts that companies are undertaking to prevent and eliminate human trafficking and slavery in their supply chains. Horizon Pharma plc, together with its applicable affiliates and subsidiaries (“Horizon Pharma”), is committed to fair labor practices in our supply chain that reflect our values and respect for human rights.

Supplier Evaluation and Verification

Horizon Pharma’s process for selecting direct suppliers is risk-based and multifaceted. The evaluation process includes a supplier risk assessment that may include questionnaires and on-site visits by Horizon Pharma personnel to ensure that each direct supplier is abiding by all applicable laws and regulations.

Supplier Audits

Horizon Pharma regularly performs audits of its direct suppliers to evaluate their good manufacturing practices and compliance with applicable laws and regulations. Audits may consist of individual and group interviews with supervisors and management, as well as comprehensive facility tours. While Horizon Pharma conducts many audits directly, it may utilize a third party.

Supplier Certification

To ensure our direct suppliers enforce our company standards, Horizon Pharma includes contract terms requiring direct suppliers to comply with all applicable laws and regulations, including such obligations as an employer regarding the health, safety, and payment of its employees. Direct suppliers are required to notify Horizon Pharma if they become aware of any actual or suspected violation of any such law or regulation.

Internal Accountability

Horizon Pharma has established a Code of Business Conduct and Ethics (the “Code”) to reflect its commitment to maintaining the highest standards of business conduct and ethics. The Code is applicable to all employees, officers, and directors of Horizon Pharma. Violations of the Code may undergo an internal investigation. An employee responsible for a Code violation shall be subject to disciplinary action up to, and including, termination of employment and, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution.

Training

Horizon Pharma provides comprehensive compliance training to all employees at the time of hiring and on an annual basis. Supplemental training is conducted as needed to support our commitment to the highest ethical standards in our industry.