

# **United Therapeutics Corporate Compliance Program**

## **Introduction**

United Therapeutics Corporation (“UT” or the “Company”) is a biotechnology company focused on the development and commercialization of unique products to address the unmet medical needs of patients with chronic and life-threatening conditions. UT is committed to conducting its business ethically and in compliance with applicable laws and regulations. In keeping with that commitment, UT has implemented a comprehensive compliance program for its U.S. operations (“Compliance Program”). This document describes that Compliance Program.

## **Mission of the Compliance Program**

The purpose of the UT Compliance Program is to: (a) prevent, detect, and correct violations of law and company policy and procedures; (b) assure the establishment of compliance-related policies and procedures for business operations; (c) assure development of training and other programs designed to educate employees regarding applicable policies, procedures and standards; (d) implement a mechanism to evaluate the effectiveness of essential elements of the Compliance Program; (e) implement a mechanism for internal reporting of potential misconduct to enable timely investigation and resolution; and (f) ensure appropriate corrective action is taken to prevent recurrence of misconduct.

## **Elements of The Compliance Program**

### **A. Chief Compliance Officer**

The Chief Compliance Officer is responsible for overseeing the administration and implementation of the Compliance Program, and will report on the Compliance Program, as needed, to the CEO and the Board of Directors. The Chief Compliance Officer leads the Compliance Committee, which is comprised of UT senior management. The Chief Compliance Officer is vested with the authority to direct and implement compliance-related change in the organization as necessary and has the authority to exercise independent judgment in assessing compliance-related matters.

### **B. Compliance-Related Policies**

As part of its commitment to the highest ethical standards of business conduct, UT has implemented corporate standards and requirements that are consistent with that obligation and are specific to the company’s operations and the evolving business and regulatory environment.

The company expects employees at all levels of the organization to comply with the Compliance Program, the standards set forth in the UT Code of Conduct and Ethics (“Code”), the company’s policies and procedures, and all applicable laws. All U.S. employees must acknowledge their responsibility and commitment to conduct the company’s business consistent with these standards and to report to management, the Chief Compliance Officer or the Legal Department knowledge of any violation of these standards. An employee who violates these standards will be subject to appropriate disciplinary action, up to and including termination.

UT's Compliance Program is intended to be consistent with applicable laws and regulations, as well as the April 2003 "Compliance Program Guidance for Pharmaceutical Manufacturers" issued by the U.S. Department of Health and Human Services Office of Inspector General ("OIG Guidance") and the revised Pharmaceutical Research and Manufacturers of America (PhRMA) "Code on Interactions with Health Care Professionals" ("PhRMA Code"), released July 2008.

### **C. Training and Educational Programs**

An important component of the Compliance Program is the training and education of employees concerning their general ethical obligations and their specific obligations to comply with company policies and procedures and with all applicable laws and regulations. UT has implemented training programs to educate employees on the Code of Conduct, on new and existing U.S. Corporate Policies, and on the standards and procedures applicable to their job functions. UT implements additional training for the entire company or particular departments and/or business units on an as-needed basis.

### **D. Communicating Compliance Issues and Concerns**

UT is committed to fostering an environment of open communication. Employees are encouraged to ask questions about the Code or other company policies and procedures to their managers, the Chief Compliance Officer, or the Legal Department.

Employees are required to raise concerns about suspected improper business practices through any of the avenues set forth above. As an alternative, employees may contact the UT Compliance and Ethics Hotline at 1-855-257-4107. The UT Compliance and Ethics Hotline is available 24 hours a day, 7 days a week, and provides an anonymous and confidential method to make suggestions, raise concerns or report misconduct. The UT Compliance and Ethics Hotline is administered by an independent outside contractor whose employees are trained to handle such calls.

UT policy prohibits retaliation or retribution against any employee for making any good faith report of suspected misconduct or improper behavior, unless such report was made with knowledge that it was false.

### **E. Monitoring, Auditing, and Investigations**

The Compliance Program includes activities designed to assess compliance with the company's policies and procedures. The Chief Compliance Officer will oversee and/or coordinate systems for periodic monitoring and auditing. On a periodic basis, the Chief Compliance Officer will develop an audit plan, recognizing that the nature and frequency of reviews will depend upon a variety of factors. A variety of internal and external resources may be used to conduct periodic monitoring and auditing. The Chief Compliance Officer will work with relevant internal experts and management to evaluate findings and ensure the implementation of any corrective action deemed necessary as the result of audits or routine monitoring activities.

The Chief Compliance Officer (or designee) will review, evaluate and determine whether further investigation is required of activities that may be inconsistent with the Code, policies or procedures, or any provision of the Compliance Program or applicable law. The

Chief Compliance Officer may, as required, request assistance from the members of the Compliance Committee or outside experts to conduct an investigation, depending on the nature of the alleged misconduct. Investigations shall be conducted confidentially to the greatest extent possible and with every effort to respect the rights of all concerned.

#### **F. Corrective Action and Discipline**

If it is determined, after investigation, that noncompliant conduct occurred, the matter will be forwarded to the appropriate parties for corrective and/or disciplinary action. Such response and disciplinary action may include (but is not limited to): terminating or otherwise disciplining the employee(s) involved; disciplining supervisors in accordance with the facts for failure to supervise adequately and control the behavior of the employee(s); revising guidelines, policies, and procedures or any function of the Compliance Program to prevent the reoccurrence of misconduct in the area; or increasing auditing and monitoring activities.

#### **G. Updating the Compliance Program**

UT will continually review its Compliance Program and will make updates to the Program on an as needed basis. The Chief Compliance Officer (or designee) shall be responsible for communicating changes in the Compliance Program to UT employees in a timely manner.