

California Compliance Program Declaration, as of March 2026



Avyxa Pharma, LLC (“AVYXA”) maintains a strong tradition of high ethical standards in the provision of services and in the conduct of its business affairs. AVYXA is committed to full compliance with all applicable federal, state, and local laws, regulations, and policies governing its operations.

Healthcare is a complex, highly regulated, and evolving industry, influenced by changes in technology, delivery systems, standards of care, treatment protocols, reimbursement, and patient needs. With that complexity in mind, AVYXA has established a Comprehensive Compliance Plan (CCP) that meets the requirements outlined in California’s Health and Safety Code §§ 119400-119402. AVYXA’s CCP is designed in accordance with the Office of Inspector General’s (OIG) “Compliance Program Guidance for Pharmaceutical Manufacturers” and the Pharmaceutical Research and Manufacturers of America’s (PhRMA) “Code on Interaction with Healthcare Professionals.” The CCP addresses, among other elements: written policies and procedures; governance and oversight; education and training; internal communication and reporting; auditing and monitoring; enforcement and discipline; and corrective action processes. AVYXA expects all employees and representatives to uphold these standards and comply with all applicable requirements in the performance of their duties.

In accordance with California law, AVYXA has adopted an annual aggregate dollar limit on applicable items of value provided to individual healthcare professionals licensed in the state of California. This limit applies to the value of reasonable educational items and meals provided in connection with legitimate business and educational discussions. The limit represents a maximum threshold, not a goal or average expenditure.

This limit does not include the following expenditures: 1- prescription drug samples given to healthcare professionals intended for free distribution to patients, 2- financial support for continuing medical education programs or health education scholarships that comply with OIG guidance and the PhRMA Code, and 3 – payments for bona fide professional services by healthcare professionals, provided such payments reflect fair market value and align with OIG and PhRMA standards.

AVYXA reviews its Comprehensive Compliance Program at least annually and, to the best of AVYXA Pharma, LLC’s knowledge and in good faith, acknowledges California law and affirms that the program is compliant with these requirements.

To request a copy of AVYXA’s Comprehensive Compliance Program, please contact AVYXA at 1-877-595-9922.