

California Compliance Program Annual Declaration



Ortho2, LLC promotes a culture that supports adherence to high ethical standards and compliance with all applicable legal requirements. In accordance with the requirements of California Health and Safety Code sections 119400 – 119402, Ortho2 has adopted written policies and procedures, guidelines, directives, and other communications that provide guidance to our employees in their dealings with health care professionals, customers, suppliers, government entities, society, other employees, and other third parties.

Through our partnership with Henry Schein, Inc. ("HSI"), the cornerstone of our written standards is HSI's Worldwide Business Standards, which is supplemented by policies and procedures, guidelines, and other communications that address applicable laws relating to the marketing, promotion, distribution, and sale of Ortho2's products and services. In addition, in accordance with California law, Ortho2 has set an annual dollar limit on gifts, promotional materials, and items of value that it provides to each individual California health professional.

Ortho2 encourages open and candid discussion between management and employees regarding compliance concerns. Ortho2 employees are encouraged to report their concerns to their manager, human resources, executive management, or through the anonymous HSI Compliance Helpline. Actions in response to detected problems, and to prevent future violations, may include improving policies or procedures, training, communication and monitoring, or disciplinary action.

Based on a good faith understanding of California Health and Safety Code sections 119400 – 119402, Ortho2 declares that, to the best of its knowledge and capabilities, it is in compliance with the applicable requirements as of October 17, 2019.

Copies of this declaration and the above description of our compliance program may be obtained by calling 800.346.4504.