Model Certification of Compliance with the PhRMA Guiding Principles on Direct to Consumer Advertisements about Prescription Medicines

We hereby certify that ______ has policies, procedures or guidelines in place to foster compliance with the PhRMA Guiding Principles on Direct to Consumer Advertisements About Prescription Medicines (the "PhRMA DTC Principles"), as revised in October 2018 and in effect as of April 15, 2019, regarding various aspects of pharmaceutical and biotechnology company direct to consumer communications.

- 1. the Company maintains relevant policies, procedures or guidelines to reflect the requirements of the PhRMA DTC Principles;
- 2. relevant employees have received information/training on the requirements of the PhRMA DTC Principles;
- 3. the Company has considered and planned the steps it will take to monitor compliance with the requirements of the PhRMA DTC Principles; and,
- 4. the Company has considered and planned the steps it will take to address reported incidents of non-compliance with requirements set forth in the PhRMA DTC Principles.

This certification is signed below by the chief executive officer and the chief compliance officer who are responsible for ______''s United States pharmaceutical business.

By:

[Date]

[Date]