



## Comprehensive Compliance Program and Annual Declaration

Urovant Sciences Ltd. (together with its consolidated subsidiaries, “Urovant” or “the Company”) is focused on developing and commercializing innovative therapies for urologic conditions for patients in need. To achieve our mission, Urovant is committed to conducting its business with the highest standards of corporate conduct and integrity. This commitment includes performing our work consistent with the Company’s Code of Business Conduct and Ethics, corporate policies and procedures, and applicable laws, regulations, and industry standards, including the Pharmaceutical Research and Manufacturers of America (PhRMA) Code on Interactions With Health Care Professionals. For this reason, Urovant has established a comprehensive Compliance Program that includes the elements described below.

Urovant’s Compliance Program is grounded and in accordance with the fundamental principles outlined in the “Compliance Program Guidelines for Pharmaceutical Manufacturers” published by the Office of Inspector General (OIG), U.S. Department of Health and Human Services (HHS) (68 Fed. Reg. 23731; May 5, 2003) (“OIG Guidance”), California SB 1765 (Health and Safety Code sections 119400-119402), and the “Code on Interactions with Healthcare Professionals” published by the Pharmaceutical Research and Manufacturers of America (the “PhRMA Code”). Our Compliance Program is continuously evolving, and is therefore reviewed and evaluated on a regular basis to ensure that it continues to address the size, structure, operations, resources, and needs of the Company as well as the evolving legal and regulatory landscape.

### COMPLIANCE PROGRAM DESCRIPTION

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#### Leadership & Governance

Urovant’s Board of Directors is committed to sound corporate governance practices. It has established a Compliance Oversight Committee to oversee the Compliance Program. In addition, Urovant has designated a Chief Compliance Officer who is charged with the overall responsibility for managing and administering the Compliance Program. The Chief Compliance Officer reports to the Board of Directors on a regular basis regarding the operations of the Compliance Program, including alleged violations and the corresponding remedial or disciplinary measures.

#### Written Standards

The Urovant Code of Business Conduct and Ethics serves as the foundation for the business practices and principles of behavior that support the Company’s commitment to ethics and compliance, including compliance with all relevant laws, regulations, and industry codes. The Company has also established, and continues to maintain, written policies and procedures that conform to the requirements of the OIG Guidance and the PhRMA Code. The standards set forth in the Company’s Code of Business Conduct and Ethics and corresponding policies and procedures apply to all Urovant personnel, and adherence to them is a condition of employment.

Urovant does not permit the provision of gifts, entertainment, and other items that are prohibited by the PhRMA Code and applicable Federal, State, and local laws and regulations. In addition, as required by California Health and Safety Code sections 119400-119402, Urovant has established an annual, aggregate dollar limit of \$2,500 on applicable items of value provided to each healthcare provider or other medical/health professional who is licensed or practicing in the state of California. The limit includes the value of legitimate educational items and meals provided in connection with business and educational discussions/presentations. In accordance with California law, this limit does not include the value of drug samples that are intended for free distribution to patients or payments associated with legitimate consulting and/or advisory services performed by such healthcare professionals. Urovant has established controls and processes to track and monitor compliance with this annual spending limit and will make adjustments as appropriate and necessary.

## **Education and Training**

All Urovant employees and pertinent third parties who are engaged by Urovant to perform work on its behalf are trained on the Company's Code of Business Conduct and Ethics, corporate and compliance policies and procedures, and laws, regulations, and industry codes that are applicable to their given job function and responsibilities. Specialized training may also be provided where an educational need is identified or to supplement or enhance training efforts. In addition, Urovant employees and third parties working on its behalf are encouraged to proactively seek guidance or clarification, ask questions, and suggest enhancements and continuous improvements to business processes, tools, and resources that support our culture of ethics and compliance. Education and informational exchange through these dialogues further enriches our overall training efforts as well as the Compliance Program. Urovant regularly reviews and updates its training programs to ensure that it meets all applicable laws, regulations, and industry codes, as well as the evolving needs of the Company and the external environment.

## **Lines of Communication**

At Urovant, we are committed to promoting a "speak up" culture and open lines of communication for all employees to ask questions, seek guidance, or report concerns relating to any known or suspected violations of the Company's Code of Business Conduct and Ethics, Urovant policies and/or procedures, applicable laws and regulations, or unethical behavior in the workplace. We continually emphasize each employee's shared responsibility in upholding the Company's standards of corporate conduct and integrity, and that Company policy prohibits retaliation or retribution against anyone who raises a concern in good faith. We have established systems and processes for raising or reporting concerns, which includes contacting an employee's direct manager or functional area leader, any member of the Executive Leadership Team, the Human Resources Department, or the Legal and Compliance Departments, whether in person, by phone, or by email. We also promote the availability of the Urovant Compliance Hotline, which is operated by an independent, third-party and always available by phone and on the internet, by which anonymous and/or confidential reports may be made.

## **Monitoring & Auditing**

Urovant regularly monitors and audits business activities to assess compliance with the Company's Code of Business Conduct and Ethics and company policies and procedures. The subject, nature, extent, and frequency of our reviews may vary based on a variety of internal and external factors, including changes in the legal or regulatory landscape, changes in business practices or controls, compliance signals, insights from our risk assessment, and any other relevant considerations. Identified potential or existing areas of concern are addressed through coaching, re-training, the development of guidance materials, updates to relevant policies and procedures, or other actions that are appropriate and necessary. The results of auditing and monitoring activities are reported to management and the Compliance Oversight Committee and are evaluated as part of the Company's overall risk assessment processes.

## **Accountability, Disciplinary Guidelines, and Corrective Actions**

The Urovant Compliance Program is committed to a framework that recognizes employees' efforts to uphold the Company's values and standards. Adherence to the Company's Code of Business Conduct and Ethics, policies and procedures, and applicable laws and regulations, is expected of all Urovant employees as a condition of hiring and continued employment. If Urovant becomes aware of any violation of such, we promptly, fairly, and diligently investigate, and take appropriate disciplinary action (including termination of employment, as appropriate) and implement corrective measures to address potential gaps and prevent the re-occurrence of non-compliance.



## **ANNUAL DECLARATION OF COMPLIANCE**

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Urovant declares that, to the best of its knowledge and based on a good faith understanding of the requirements of California SB 1765 (Health and Safety Code sections 119400-119402), it is in compliance with such requirements. Urovant is committed to upholding the highest standards of business conduct and ethics and operates its Compliance Program accordingly and consistent with OIG Guidance, the PhRMA Code, and other applicable requirements and standards.

**Last Update: July 2021**

To obtain a copy of Urovant's Comprehensive Compliance Program description and Annual Declaration, please call (833) 876-8268 or email [compliance@urovant.com](mailto:compliance@urovant.com).