



SUMMARY OF COMPREHENSIVE COMPLIANCE PROGRAM

1. Introduction

The Medicines Company (the “Company”) is committed to establishing and maintaining an effective compliance program that promotes ethical conduct in accordance with the “Compliance Program Guidance for Pharmaceutical Manufacturers,” developed by the United States Department of Health and Human Services Office of Inspector General (the “OIG Guidance”). To help achieve this objective, The Medicines Company has established a Compliance Program that is founded on the seven elements described in the OIG Guidance.

The purpose of our Compliance Program is to prevent and detect violations of law and Company policy. As acknowledged by the OIG Guidance, however, implementing a Compliance Program may not eliminate improper employee conduct in its entirety. Nevertheless, The Medicines Company expects all employees to comply with applicable laws and regulations, our Global Code of Conduct and Ethics (the “Code”), and the policies and procedures established in support of the Code. If The Medicines Company becomes aware of violations of law, Company policy, or the Code, we will investigate the matter and, if appropriate, take disciplinary action and implement corrective measure to prevent future violations.

The following is an overview of the fundamental elements of our Compliance Program. As encouraged by the OIG Guidance, we have tailored these elements to address our Company’s unique compliance needs. Moreover, The Medicines Company regularly reviews the effectiveness of its Compliance Program and refines it to meet our evolving compliance objectives.

2. Overview of Compliance Program

a. Leadership and Structure

Senior Management Committee. The Medicines Company has established the Global Integrity Oversight Committee (the “Committee”) to ensure that the Company sets and meets appropriate ethical, compliance, medical, and regulatory standards. This Committee is responsible for implementation of the Compliance

Program and meets regularly to review our compliance efforts and, if required, modify our policies and procedures to respond to changes in the Company's needs and applicable law. The Committee also has the authority to effectuate changes within the Company as needed and the ability to exercise independent judgment.

Compliance Officer. The individual acting as the primary contact for our compliance activities is a high-level official with direct access to the Company's Chief Executive Officer, the Board of Directors, and other senior management, including the Committee. The compliance officer's responsibilities include: overseeing and monitoring implementation of the Compliance Program; reporting to the Committee and/or Company's CEO on compliance matters; overseeing the development and execution of a multifaceted educational and training program; and investigating and, where appropriate, acting on reports of noncompliance.

b. Written Policies and Procedures

The Medicines Company's Global Code sets forth the general principles that serve as the foundation for the Company's specific policies and procedures and explains how those principles translate into consistent, ethical conduct worldwide. The Code establishes the Company's expectation that management, employees, and agents of the Company obey all applicable laws, act in an ethical manner, and make business decisions that comply with the Company's policies and standards of quality.

The Company has adopted policies, procedures, guidelines, and practices that are in accord with OIG Guidance. These measures reflect our commitment not only to compliance with applicable federal and state law, but also to a culture of honesty, integrity, and accountability. We review our policies and procedures on a routine basis and revise them as necessary to meet the Company's quality standards and the changing requirements imposed by law.

Additionally, the Company has adopted the general principles of the most recent PhRMA Code on interactions with Healthcare Professionals (the "PhRMA Code") and has incorporated these general principles into its policies, guidelines, and practices. The PhRMA Code is premised on the belief that a healthcare professional's care of patients should be based solely on each patient's medical needs and is intended to preserve the independence of the healthcare professional's judgment and decision-making. All directors, officers, and employees of the Company are expected to comply with the principles of the PhRMA Code as embraced in the Company's policies and procedures when interacting with healthcare professionals. Company personnel are prohibited from providing or offering financial support, consulting contracts, hospitality, entertainment, or gifts to healthcare professionals to influence or reward prescribing or recommendation practices in favor of Company products.

c. Effective Training and Education

The Medicines Company is committed to taking the necessary steps to effectively communicate our policies and procedures to all affected personnel. Training and education of our employees on their legal and ethical obligations under applicable healthcare laws, Company policy, and the Code are important components of our Compliance Program. The Medicines Company's employee training program is mandatory and consists of both initial and refresher training on the Company's compliance policies and procedures. Additionally, the Company regularly reviews and updates its training program, as well as identifies additional areas of training on an "as needed" basis.

d. Effective Lines of Communication

Courageous communication is a central tenet in how The Medicines Company conducts its daily business activities. The Medicines Company is committed to fostering dialogue between management and employees. Our goal is that all employees, when seeking answers to questions or reporting potential compliance issues, will know who to turn to for a meaningful response and will be able to do so without fear of retaliation. As part of our commitment to ethical and legal behavior, The Medicines Company requires every employee, officer, and director to ask questions, seek guidance, report suspected violations, and express concerns regarding compliance with the Code, and policies and procedures. Any employee, officer, or director who knows or believes that any other employee or representative of the Company has engaged or is engaging in Company-related conduct that violates applicable law or the Code must report such information to his or her supervisor, the Compliance Officer or the General Counsel. In addition, we have established a toll-free integrity helpline to allow employees to anonymously submit concerns and questions 24 hours a day, seven days a week.

e. Monitoring and Auditing

The Medicines Company Compliance Program includes the processes by which the Company will monitor and evaluate whether there are policies and procedures adequately addressing risk areas and whether there is compliance with such policies and procedures. In accordance with the OIG Guidance, we note that the nature of our reviews, as well as the scope and frequency of our compliance monitoring, varies according to a number of factors, such as new regulatory requirements and changes in business practices.

f. Responding to Potential Violations

The Medicines Company's Compliance Program supports prompt response and corrective action for any detected problems. Although each situation is considered on a case-by-case basis, the Company has established a procedure to ensure that all reported incidents of potential compliance violations are carefully reviewed, investigated in a timely manner, and, where appropriate, result in corrective action and preventive measures. Employees who violate Company

policies and procedures or applicable federal and state law are subject to disciplinary action, up to and including termination.

g. Corrective Action Procedures

The goal of our Compliance Program is to prevent, or at least detect, unlawful and unethical behavior. As the OIG Guidance recognized, however, even an effective compliance program may not successfully prevent all violations. Therefore, The Medicines Company is committed to continuously assessing the effectiveness of our Compliance Program to enable us to make necessary adjustments or refinements.

3. Statement of Annual Aggregate Limit

California Health & Safety Code §§ 119400 and 119402 requires pharmaceutical companies to adopt and make available a Comprehensive Compliance Program that establishes an annual aggregate dollar limit on gifts and expenditures directed to an individual medical or healthcare professional who resides or practices in California. In accordance with the requirements of California's law, The Medicines Company has determined that its annual aggregate limit on gifts, promotional materials, or items or activities that may be provided to an individual medical or healthcare professional who resides or practices in California is \$1,250 per covered recipient, per year. This annual aggregate limit applies to dollars expended on educational or scientific programs designed to inform healthcare professionals about the Company's products and the disease states that these products are designed to treat. In setting this annual aggregate limit, The Medicines Company has taken into account the size of the Company and the size of the Company's product portfolio. As the size of the Company and product portfolio changes, The Medicines Company may revise the annual aggregate limit.

It is important to note that The Medicines Company's annual aggregate limit represents a maximum limit and is not a spending goal. In tracking expenditures, the Company excludes from its annual aggregate limit the following items, which are exempt under California law: (1) financial support for continuing medical education forums; (2) financial support for health educational scholarships; and (3) payments made at fair market value for, or in connection with, legitimate professional services provided by healthcare professionals. Additionally, the term "promotional materials", as used in the Compliance Program, excludes the documents and information that serve as the basis of The Medicines Company's interactions with healthcare professionals and inform such individuals about our products and provide scientific and educational data. This includes items such as educational brochures or other materials to track medical information provided to patients.

For purposes of making its declarations under California law, The Medicines Company applies its annual aggregate limit on a calendar year basis (i.e., for expenses incurred January 1st through December 31st of each year).

4. California Declaration of Compliance

Based on our good faith understanding of the California requirements, as of the date of this Declaration, The Medicines Company declares that to the best of its knowledge and belief it is in compliance with its Compliance Program as required by California Health & Safety Code §§ 119400 and 119402.

We also declare that the structure of our Compliance Program, and the guidelines enunciated in our policies governing interactions with healthcare professionals in California incorporate the principles articulated in the OIG Guidance and the PhRMA Code. While we cannot completely eliminate the possibility that an individual employee will violate these standards, our Compliance Program is reasonably designed to prevent, detect, and address violations of state and federal laws as well as our own internal policies and procedures.

As appropriate and in accordance with the law, The Medicines Company will amend and update its policies and procedures and this Declaration as necessary to assure compliance. In addition to this ongoing refinement process, The Medicines Company will reassess its Compliance Program at least annually.

This Declaration is effective as of July 1, 2017.

Copies of this Summary of Comprehensive Compliance Program and the California Declaration of Compliance may be obtained upon request by contacting The Medicines Company at (800) 388-1183.