

**Annual Declaration Pursuant to
California Health and Safety Codes §§ 119400-119402**

Neos Therapeutics has established a Compliance Program in accordance with California Health and Safety Codes §§ 119400-119402. To the best of its knowledge and based on its good faith understanding of the statutory requirements, the Company has established a Compliance Program that meets the requirements set forth in California Health & Safety Code, Sections 119400-119402.

Neos has tailored its Compliance Program to meet the specific needs of the Company and continuously assesses the effectiveness of the Compliance Program. The Company has established an internal monitoring system designed to help ensure compliance with its respective annual spending limits in California and established routine corporate tracking and monitoring processes to evaluate other business activities. Based on the above efforts, Neos declares that the Company is in compliance with the Compliance Program and annual aggregate dollar limit provisions outlined in the California statutory requirements.

As recognized in the April 2003 *Compliance Program Guidance for Pharmaceutical Manufacturers*, published by the United States Department of Health and Human Services, Office of Inspector General (OIG Guidance), even an effective Compliance Program cannot completely eliminate the possibility that individual employees are engaging in conduct that would be considered improper. The Compliance Program at Neos Therapeutics, however, is reasonably designed, implemented and enforced with the goal of preventing, detecting and/or remediating such improper conduct.

Neos Therapeutics

August 1, 2019