

- a) Drive initial demand and favorable formulary coverage through payer segmentation and by ensuring predictability of payer budgets
 - Educate payers on how Hysingla ER aligns with their approach to IR/ER opioid category management and demonstrate limited impact to budget
 - Harness real-world evidence and value-added collaboration to demonstrate long-term commitment to better patient outcomes
- b) Leverage MSL knowledge base / relationships with payers and KOLs to support ADF messaging, drive access and provide input into formulary decisions
- c) Ensure access through copay support, access coordination and seamless fulfillment

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a) Access Strategy and Formulary Coverage

Access Strategy

Pricing, Rebates

Contracting

Strategy

- WAC price and rebate offers set at parity with OxyContin (peak 26% blended rebate)
- Targeted contracting strategy based on plan segmentation and profitability, i.e.,:
 - Guaranteed generic-to-branded ratio

- Exclusive contracts (i.e., vs. Teva)

• Aggressively drive initial demand to grow volume and facilitate contracting



- Hysingla ER aligns with current approach to IR/ER opioid category management will not grow the branded ERO market
- Budget impact of access to Hysingla ER is limited



Note: 1) Tier 3 Open includes 30-day quantity limits and step edits through hydrocodone IR Source: Managed Markets team projections

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PURDUE

a) Payer Budget Impact Model

| Develop Rationale for Switching to Hysingla ER | | | | | | |
|--|--|--|--|--|--|--|
| Identify | Expected patterns of ER hydrocodone use Analyses of claims data from IR hydrocodone users, with subpopulations based on usage patterns and payer type | | | | | |
| Determine | The current APAP burden in IR hydrocodone users Based on analyses of claims data (prescription use only) | | | | | |
| Estimate | Profile and costs of patients with excessive use of IR hydrocodone Excess cost of IR hydrocodone patients diagnosed with abuse | | | | | |

Partner to Facilitate Appropriate Patient Access

- HC cost of opioid pop.
- Excess costs of abusers
- Impact PMPM
- APAP overuse
- PA management costs
- Total Hysingla ER budget impact



H¥0 120



b) Managed Care and KOLs



U.S. - 18



- a) Leverage Purdue's existing, experienced sales force to drive uptake with target HCPs, with Hysingla ER at priority position at launch
- b) Leverage real-world data to address payer and policy-maker concerns on Hysingla ER use
- c) Pursue favorable public policy and regulatory status for Hysingla ER (e.g., ADF special tier status)

U.S. - 19



Hysingla ER Financial Opportunity

Hysingla ER Net Revenue



Note: Gross sales include demand and stocking; analysis assumes competitor rebates match Hysingla ER rebates, 43% of total IRO to ERO conversions are hydrocodone familiar, 39% of these conversions go to a branded ERO treatment, the hydrocodone ERO market captures 40% of this branded & familiar opportunity. Price: \$327/ avg. Rx in 2015 with annual +3% price increases; Assumes 90% of Hysingla ER market goes generic once either generic OxyContin or Hysingla ER is available; Sources: Butrans Market by Specialty, February OxyContin LRx Report, Peak brand share of new entrants from Source of Business Data (IMS); Monitor Deloitte Analysis

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U.S. - 20



Notes: Gross sales include demand and stocking; includes cannibalization attributed to Hysingla ER market entry from 2015-2019; Key costs (i.e., marketing, sales force) reduced in 2020 when generic hydrocodone ER (Teva) expected in market; NPV based on 9% discount rate; Sources: 2013 10-Year Plan; Butrans Market by Specialty, Combo and Chronic TRx; February OxyContin LRx Report, Peak brand share of new entrants from Source of Business Data (IMS); Monitor Deloitte Analysis

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PURDUE Hysingla ER P&L

| (000s) | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | Total |
|---|---------------------|-----------------------------------|------------------------|-------------------------------|-------------------------|-------------------------|------------------------|------------------------------|--|
| Gross Sales | - | 85,990 | 191,882 | 312,098 | 381,730 | 344,094 | 148,383 | 15,382 | \$1,479,559 |
| Net Sales | - | 61,257 | 133,195 | 201,620 | 263,542 | 236,448 | 101,498 | 9,877 | \$1,007,436 |
| Gross Profit | - | 52,917 | 114,922 | 176,146 | 235,247 | 210,994 | 90,614 | 8,835 | \$889,676 |
| Selling & Promotion % of net sales | 11,600 | 81,333 <i>133%</i> | 77,699 58% | 75,793 <i>38%</i> | 73,930 <i>28%</i> | 72,113 <i>31%</i> | 22,114 <i>22%</i> | | \$414,582 41% |
| Other Expenses (R&D, Legal, G&A, Health Care Reform Fees) | 1,400 | 20,227 | 19,256 | 22,291 | 25,236 | 19,524 | 11,314 | 7,367 | \$126,614 |
| Product Contribution % net sales | \$(13 <i>,</i> 000) | \$(48,643) - <i>79%</i> | \$17,967 13% | \$78,062 <i>39%</i> | \$136,081 52% | \$119,357 50% | \$57,186 56% | \$1,469 15% | \$348,479 35% |
| Cannibalization Impact | - | 19,603 | 11,022 | 16,029 | 21,201 | 21,960 | - | - | \$89,814 |
| Product Contribution Post Cannibalization % of net sales | \$(13,000) | \$(68,246) -111% | \$6,946 5% | \$62,033 <i>31%</i> | \$114,880 44% | \$97,397 41% | \$57,186 56% | \$1,469 <i>15%</i> | \$258,665 26% |
| NPV: \$94M | | | | | | | | | 26% to the second secon |

Note: Gross sales include demand and stocking; includes cannibalization attributed to Hysingla ER market entry from 2015-2019; Key costs (i.e., marketing, sales force) reduced in 2020 when generic hydrocodone ER (Teva) expected in market; Selling & Promotion includes ~\$48M per year of sales expense (1/3 cost of the current 525 sales reps) U.S. - 22

PURDUE 2014 Investment Request



Note: Does not include \$1M in amortization of milestones in 2014 in P&L

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2015 S&P Investment Request

| Establish Hysingla ER as l of Choice for Proactive Conv | Brand or | 2. Increase Hydrocodone If Conversion v Focus on Dela | R to ER with | 3. Align Access Strateg Targeting t Maximize Profi Growth | 0 | 4. Optimize Purdue Pain As Accelerate Hys ER Uptak | sets to singla |
|---|-------------|---|-----------------|---|---------|---|-------------------|
| Name | \$M | Name | \$M | Name | \$M | Name | \$M |
| KOL Program | \$7.6M | Unbranded HCP, | \$5.0M | | | | |
| Ads, Print, Direct Mail, PTN | \$4.1M | Patient Agency Fee (half) | \$1.8M | Savings Card Admin | \$2.3M | Conventions | \$2.0M |
| eMarketing | \$3.5M | Physicians Interactive | \$1.7M | | | | _ |
| Agency Fee (half) | \$1.8M | Patient Identification | 50.8M | Adherence Prog. | \$1.1M | Special Promotions | \$1.5M |
| Virtual Rep Call Cntr. | \$0.3M | | | | | Sales Force | |
| Other (e.g., analytics) | \$1.5M | Telemarketing | \$0.5M | H.O.P.E. | \$2.8M | (share of existing | \$47.4M |
| Publications Plan | \$0.7M | Other (e.g., analytics) | \$1.5M | | · | team) | · |
| Total | \$19.5M | Total | \$11.3M | Total | \$6.2M | Total | \$50.9M |
| Cost Center | Marketing | S | ales | Other Launch | Support | Overall | |
| Total \$M | \$34M | \$ [,] | 47M | \$7M | | \$88M | |



Launch Hysingla ER with a focus on driving share within two priority HCP segments

Fund additional investment (\$12M incremental in 2014) to build foundation for Hysingla ER launch and to generate momentum in the limited timeframe as the first-to-market hydrocodone ER with ADF

U.S. - 25



U.S. - 26

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Hysingla ER P&L – Detailed

| (000s) | _ | 2014 | 2015 | | 2016 | 2017 | | 2018 | | 2019 | | 2020 | | 2021 | |
|------------------------------|---------|------------|------------|-------|----------------------------|-----------|-----|-----------|-----|-----------|-----|-----------|-----|----------|-----|
| Gross Sales | | | \$85,990 | | \$191,882 | \$312,098 | | \$381,730 | | \$344,094 | | \$148,383 | | \$15,382 | |
| Fee for Service | % gross | | 1,720 | 2% | 3,838 2% | 6,242 | 2% | 7,635 | 2% | 6,882 | 2% | 2,968 | 2% | 308 | 2% |
| Sales Discounts & Allowances | % gross | | 7,019 | 8% | 9 ,59 4 <i>5%</i> | 12,484 | 4% | 11,452 | 3% | 10,323 | 3% | 4,451 | 3% | 461 | 3% |
| Patient Savings Cards Disc. | % gross | | 6,019 | 7% | 8,535 4% | 11,705 | 4% | - | 0% | - | 0% | - | 0% | - | 0% |
| Rebates on Factory Sales | % gross | | 9,975 | 12% | 36,720 19% | 80,047 | 26% | 99,102 | 26% | 90,442 | 26% | 39,466 | 27% | 4,735 | 31% |
| Net Sales | _ | | 61,257 | | 133,195 | 201,620 | | 263,542 | | 236,448 | | 101,498 | | 9,877 | |
| COGS/Shipping & Warehsg | % gross | | 3,440 | 4% | 7,675 4% | 12,484 | 4% | 15,269 | 4% | 13,764 | 4% | 5,935 | 4% | 615 | 4% |
| Royalty | % net | | 4,901 | 8% | 10,597 8% | 12,990 | 6% | 13,025 | 5% | 11,689 | 5% | 4,949 | 5% | 427 | 4% |
| Gross Profit | _ | | 52,917 | 62% | 114,922 60% | 176,146 | 56% | 235,247 | 62% | 210,994 | 61% | 90,614 | 61% | 8,835 | 57% |
| Selling & Promotion | % net | 11,600 | 81,333 | 133% | 77,699 58% | 75,793 | 38% | 73,930 | 28% | 72,113 | 31% | 22,114 | 22% | - | |
| Marketing Expense | _ | 11,600 | 33,933 | | 28,877 | 25,506 | | 22,135 | | 18,764 | | 5,629 | | - | |
| Sales Force Expense | | | 47,400 | | 48,822 | 50,287 | | 51,795 | | 53,349 | | 16,485 | | - | |
| Other Expenses | _ | 1,400 | 20,227 | | 19,256 | 22,291 | | 25,236 | | 19,524 | | 11,314 | | 7,367 | |
| Amort. of Milestones | | 1,000 | 1,600 | | 1,600 | 1,600 | | 1,600 | | 1,600 | | | | | |
| | | | | | Reda | acted | | | | | | | | | |
| General & Admin | % net | | 1,907 | 3% | 3,552 3% | 5,781 | 3% | 7,685 | 3% | 7,256 | 3% | 3,689 | 4% | 773 | 8% |
| R&D | | 400 | 14,220 | | 10,752 | 10,381 | | 10,018 | | 4,970 | | 5,107 | | 5,251 | |
| Product Contribution | % net | \$(13,000) | \$(48,643) | -79% | \$17,967 <i>13%</i> | \$78,062 | 39% | \$136,081 | 52% | \$119,357 | 50% | \$57,186 | 56% | \$1,469 | 15% |
| Cannibalization | _ | | 19,603 | | 11,022 | 16,029 | | 21,201 | | 21,960 | | | | | |
| OxyContin Impact | | | 17,158 | | 9,178 | 13,393 | | 17,912 | | 18,645 | | | | | |
| Butrans Impact | | | 2,445 | | 1,844 | 2,637 | | 3,289 | | 3,315 | | | | | |
| Net Product Contribution | % net | \$(13,000) | \$(68,246) | -111% | \$6,946 5% | \$62,033 | 31% | \$114,880 | 44% | \$97,397 | 41% | \$57,186 | 56% | \$1,469 | 15% |
| Net Income | % net | \$(8,450) | \$(44,360) | -72% | \$4,515 3% | \$40,321 | 20% | \$74,672 | 28% | \$63,308 | 27% | \$37,171 | 37% | \$955 | 10% |
| NPV: \$94M | _ | | | | | | | | | | | | | | |

Note: Gross sales include demand and stocking; includes cannibalization attributed to Hysingla ER market entry from 2015-2019; Key costs (i.e., marketing, sales force) reduced in 2020 when generic hydrocodone ER (Teva) expected in market
U.S. - 27





- Positioning serves as the foundation for brand strategy
- Brand strategy consists of four strategic pillars for Hysingla ER that will bring the positioning to life
- Strategic pillars outline how Hysingla ER's value proposition will be made clear to all stakeholders

U.S. - 28

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Source: IMS Health, Purdue Pharma analysis, Monitor Deloitte analysis

U.S. - 29

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Current Branded ERO Market Environment







U.S. - 30

Hydrocodone ER Competition

PURDUE

| | 2014 | > | 2015 | |
|-------------------------------|---|---|---|---|
| | Zohydro | Ч Hysingla ER | MNK-155 | CEP-33237 |
| | Zogenix | PURDUE | Mallinckrodt Pharmaceuticals | 573771 |
| Launch | March 2014 | Q1 2015 | Q2 2015 | Q4 2015 |
| Abuse Deterrence | None (ADF to launch Q4 2016 ¹) | 1000 1010 1000 1000 1000 1000 1000 100 | Physical abuse deterrence (ADF label pending) | e |
| Label / Product Properties | Q12 dosing 6 dose strengths No APAP | Q24 dosing 7 dose strengths No APAP | Likely indicated for acute post-op pain Combined IR and ER pharmacokinetics Contains APAP | Q12 dosing 4-5 dose strengths No APAP |
| Loss of Exclusivity | ADF version post Q4 2021 | Q4 2022 | No exclusivity / patent overlap with competitors | Q1 2020 (if launched in 2015) |

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Note: 1) An abuse deterrent formulation of Zohydro will likely launch in 2015 but without an ADF indication

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b) KOL Engagement Strategy



U.S. - 32



b) Publication Plan (for Publications and Presentations)

Phase 1: Pre-Launch (2013-2014)

- Public health and economic value of abuse-deterrent opioid formulations
 - Costs to employers
 - Use of opioids with ADF to address opioid abuse
- Hydrocodone / APAP products some patients prescribed high doses, longterm treatment, risks of toxicity
 - Exposure to high doses of acetaminophen is common despite risks of toxicity
- Introduce Hysingla ER as a drug in development to the scientific community

Phase 2: Peri-Launch *(1Q-2Q 2015)*

- Efficacy, effectiveness, tolerability, and safety
 - Double-blind pivotal trial
 - Open-label 12-month trial
 - Incoming Vicodin users
 - Hysingla ER's ADF
 - Doing guidelines
 - Once-daily pharmacologic profile
 - Information for payers

Phase 3: Post-Launch *(3Q 2015-2016)*

- Long-term effectiveness and safety
 - Open-label 18-month data
- No signal of hearing disturbances
- Tolerability and effective analgesia in multiple patient populations
- Comprehensive pharmacologic profile
 - Lack of PK effect with food
 - PK in special populations
 - Review of clinical pharmacology program
- Abuse deterrence in community settings
- Pharmacoeconomics (HOPE)

Pain medicine specialists

- American Acad. of Pain Mgmt.
 - American Acad. of Pain Med.
- American Pain Society
- Etc.

Primary care / supportive care

- American Academy of Family Practitioners
- American Assoc. of NPs
- American Academy of PAs

Managed care / payers

- American Acad. of Managed Care Pharmacy
- CPDD
- ISPOR



a) IRO to ERO Switching Triggers

Primary Triggers for Switching

- Too many pills per day (limit for most physicians of 6-8)
- Dose too high and pain not managed sufficiently
- Break-through pain or "highs and lows"
- Running out of pills prior to the end of the prescription
- Acute pain becomes chronic (lasts longer than 3 months)

Who switches and when?

- HCPs who are comfortable prescribing EROs are most likely to switch to an ERO once an IRO has been proven ineffective
- Pain Management specialists (i.e., pain management, anesthesiologist, PM&R, Rehabilitation Medicine) frequently modify opioid usage to a combination of immediate and extended release opioids upon referral from inappropriately-dosed IROs
- Neurologists switch as a last resort, after other agents (e.g., Lyrica, gabapentin) have been tried. Extended release opioids are frequently viewed as an add-on therapy

U.S. - 34

Primary Triggers for NOT Switching

 Provider unwilling to initiate ERO (unfamiliarity with EROs, pain not deemed "severe enough,"

Patient viewed as well-controlled / not complaining

Prohibitive insurance (e.g., branded ERO is NOF)

• Previous ERO failure (e.g., inadequate pain relief,

Inconsistent process for reassessing pain

higher scrutiny of CII vs. CIII)

adverse drug event)



Note: 1) Tier 3 Open includes 30-day quantity limits and step edits through hydrocodone IR; 2) Coverage is an average of rates during Q1-Q4 of each year post launch Sources: Fingertip Formulary as of 7/3/14: Formulary Data Trend Report 2010 forward for Butrans, Exalgo, and Nucynta ER; HYD forecast based on Managed Markets team projections

U.S. - 35

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a) Current Sales Force Supports Full Portfolio



80K target HCPs overall

P1 MixPDE MixHysingla ER255K384KButrans205K254KOxyContin346K538K

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U.S. - 36

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b) Post-Marketing Studies to Support Payer Strategy

| | Key Message Purdue's PEO-based formulation deters abuse of opioids with abuse-deterrent characteristics | Postmarketing epidemiology studies for reformulated OxyContin demonstrating decreases in abuse | Barriers Addressed Concern that large dosage strength tablets of hydrocodone may become widely abused or diverted if Hysingla ER use increases |
|-------------------------------------|---|---|---|
| Real-world/Epidemiology | Purdue's PEO-based formulation decreases resource utilization associated with abuse | Postmarketing epidemiology studies for reformulated OxyContin demonstrating decreases in diagnosed abuse / addiction / overdose | Concern that Hysingla ER will increase resource utilization for payers due to increased abuse/addiction |
| – Real-worl | A large number of patients remain on IR hydrocodone-acetaminophen for longer than 90 days and chronically consume unsafe levels of acetaminophen from IR hydrocodone-acetaminophen | MarketScan commercial and Medicaid insurance claims analyzed within Purdue | Opinion that ER hydrocodone is not needed because IR hydrocodone is used short term and is generally safe |
| | Patients who use long-term ER opioids can be predicted so that patient segments/pricing can be determined | MarketScan commercial and Medicaid insurance claims analyzed within Purdue | Confusion about which patients would be suitable for Hysingla ER and budget impact |
| agement — | Abuse rates of Hysingla ER in the community compare favorably with comparator opioid products and are lower than Zohydro | FDA-required postmarketing epidemiology studies for Hysingla ER assessing abuse versus other opioids | • Concern that Hysingla ER use will exacerbate the problem of abuse, overdose & death associated with opioids |
| Risk Management | Prescribers and patients are educated about safe and appropriate use of Hysingla ER by the ER/LA REMS | • REMS Assessments indicating EMS- compliant continuing education courses are widely available and effective | Concern that Hysingla ER will be prescribed inappropropriately or used unsafely by patients |

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c) Corporate Affairs Support for Hysingla ER

| Function Government Relations | Strategy Drive policy initiatives at the federal and state level to support access for Hysingla ER and remove hydrocodone formulations without ADF from the market, if desired | Tactical Details Introduce and advance state-level legislation that prohibits prescribing of non-ADF medication when an ADF is prescribed Continue informing FDA regulatory policymaking process with respect to value of ADFs and risk of non- | | | | |
|-------------------------------------|---|---|--|--|--|--|
| Communications | Conduct outreach through the media and other communications | ADF generics Generate mass-market, trade outlet and social media publicity around product milestones | | | | |
| | channels to promote the value of Hysingla ER as a new therapeutic agent with abuse-deterrent properties | Conduct regular informational briefings to select reporters, increasing their knowledge of the product class; Hysingla ER specifically, new research data, and related medical and policy issues | | | | |
| | | • Leverage paid media to generate awareness of and support for Hysingla ER as a tool for appropriate pain management with abuse deterrent properties | | | | |
| Policy / Alliance Development | Communicate the value of Hysingla ER to key opinion leaders, HCP organizations, and patient advocacy | Develop tools to enable Purdue and its external stakeholders to appropriately and effectively convey the value of ADFs | | | | |
| | groups; mobilize these groups to support product commercialization | In alignment with the Communications function, rapidly correct misinformation regarding Hysingla ER, its product class and/or the broader area of pain management medication | | | | |

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Hysingla ER Launch Rollout Timeline



U.S. - 39

Note: Currently evaluating accelerated launch in Q4 2014

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2015 - 2019 TRxs



U.S. - 40

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Key Risks

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| Risk | Downside Potential | Risk Level | | | |
|------------------------------------|---|-------------------|--|--|--|
| Lower | Managed care requires higher rebates and / or lower formulary status | | | | |
| Managed Care Coverage | Teva achieves better access than Hysingla ER | | | | |
| Earlier Generic | Generic non-ADF Zohydro launches before 2020 and gains share | | | | |
| Entry | Teva product goes generic at Hatch Waxman expiry (2018 vs. 2020) | | | | |
| Lower ERO | Hydrocodone ER entry does not increase switching rate from IRO to ERO | | | | |
| Market Growth | Hydrocodone products not rescheduled | | | | |
| No 100mg/120mg Dose Approval | 100mg and 120mg dosing not approved | | | | |
| | MNK product receives indication broader than post-op pain | | | | |
| Higher Competitive | Zohydro able to overcome negative press; gains in market share | | | | |
| Intensity | Additional competitive products (e.g., Collegium) enter the market and shift Purdue's focus away from Hysingla ER | | | | |
| | Low Risk Medium Risk | High Risk | | | |

Note: Risk level is a qualitative assessment of probability and likely impact

TAB 4

U.S. - 42 PURDUE-COR-00017619

Materials to be provided at meetings

TAB 5

U.S. - 44 PURDUE-COR-00017621

Quarterly Compliance Report to Board of Directors 2Q2014

Bert Weinstein Vice President, Corporate Compliance August 14, 2014

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U.S. - 45

Compliance Summary for 2Q2014

Purdue continues to have strong systems and processes in place to prevent and detect violations of law, regulations and company policies, and to remediate issues before they become significant problems.

No significant compliance issues in the 2nd quarter, or to date in 2014

The following pages report on Purdue's Sunshine Act reporting and on Compliance audits during 2Q2014

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U.S. - 46



Sunshine Act



U.S. - 47

2014 Sunshine Act filing (2013 data)



- Sunshine filing timely made in June for six Purdue "Applicable Manufacturer" entities - - see below
- The "General Dollar" amount of \$3,774,933 will be the reported spend on the CMS website in September; "Research Dollars" will be reported on a delayed basis in the future to protect confidential R&D information

| Applicable Manufacturer | General (# transactions) | Research (# Transactions) | Total Transactions | General Dollars | Research Dollars * | Total Dollars |
|---|-----------------------------|------------------------------|-----------------------|-----------------|--------------------|-----------------|
| Purdue Pharma L.P. | 22,892 | 953 | 23,845 | 2,732,705.04 | 6,263,169.61 | \$8,995,874.65 |
| Rhodes Pharmaceuticals L.P. | 1 | 13 | 14 | 87.56 | 646,708.70 | \$646,796.26 |
| Purdue Products L.P. | 4 | 0 | 4 | 5,669.96 | 0 | \$5,669.96 |
| Purdue Neuroscience Company | 0 | 77 | 77 | 0 | 361,266.46 | \$361,266.46 |
| Purdue Transdermal Technologies L.P. | 2420 | 4 | 2424 | 1,036,125.59 | 9,349.54 | \$1,045,475.13 |
| Purdue Pharma of Puerto Rico | 17 | 0 | 17 | 345.19 | 0 | \$345.19 |
| TOTAL | 25,334 | 1,047 | 26,381 | 3,774,933.34 | 7,280,494.31 | \$11,055,427.65 |

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- During the period July 14th August 27th, HCPs and Teaching Hospitals may view data and raise disputes with CMS as to spend reported by Applicable Manufacturers
- To date, no disputes have been received (perhaps, because, in order to dispute spend, recipients must first register on the CMS website, requiring personal data and a complicated process?)
- Corporate Compliance will manage any disputes with relevant business areas affected to preserve customer relations
- CMS plans to make all Applicable Manufacturers' data public September 30th

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Compliance Audits



U.S. - 50

Compliance Audits Completed – 2Q2014

Managed Care

- To provide a level of assurance that Purdue Managed Care Account Executives and Area Managers were performing activities in compliance to the Managed Care SOP.
- No Critical Findings; Findings concerning documentation of issues on FCRs, submission timing of FCRs, accuracy / timing of expense submissions, timing of call note entries, and call note reviews by managers. Remediation is underway

Aggregate Spend - Commercial

- To verify that Sales Representatives were properly documenting expenses related to Health Care Professionals
- No Critical Findings; Findings concerning data and documentation accuracy and manager oversight. This was a follow up audit from 2013, to assure accurate state and federal spend reports.



Compliance Audits In Progress – 2Q2014

Speaker Programs

- To assess compliance with speaker program procedures and company guidelines
- Report pending preliminary findings include: size of speaker bureau may be too large for the number of programs; but significant improvements from 2011 Compliance audit

Contracts with HCPs and payment at FMV

- To assess compliance with contracting and fair market value procedures
- Report pending No Critical Findings; found a small percentage of transactions did not have a Statement of Work associated with the HCP's contract

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If there are any questions or comments, please contact Bert Weinstein at

@pharma.com, or at



U.S. - 53

TAB 7

U.S. - 54 PURDUE-COR-00017631

Materials to be provided at meetings