

## **Acorda Therapeutics, Inc.** **Comprehensive Compliance Plan**

Acorda Therapeutics, Inc. (“**Acorda**,” “**The Company**”) is committed to ensuring its interactions with healthcare professionals adhere to high ethical standards and comply with the applicable statutes, regulations, and requirements. As a part of this effort, Acorda has adopted a Comprehensive Compliance Plan in accordance with the “OIG Compliance Program Guidance for Pharmaceutical Manufacturers” developed by the United States Department of Health and Human Services Office of the Inspector General (“**OIG Guidance**”) and the Revised PhRMA Code on Interactions with Healthcare Professionals effective January 1, 2009 (“**PhRMA Code**”).

An overview of Acorda’s Compliance Plan is presented below.

### **Overview of Acorda Compliance Plan**

#### **1. Written Standards**

Acorda’s Code of Ethics outlines the Company’s fundamental principles and values in conducting business with integrity and in accordance with high ethical standards. In addition to the Code of Ethics, Acorda has also implemented complementary and supplementary policies and procedures of Acorda that address potential risk areas identified by the OIG.

Acorda’s directors, officers, and employees are expected to comply with the Compliance Plan, the Code of Ethics, and all written policies and procedures.

#### **2. Leadership and Structure**

Acorda’s Chief Compliance Officer is responsible for overseeing the development and operation of Company’s Compliance Plan. The Chief Compliance Officer is responsible for training employees on the Compliance Plan, addressing allegations of non-compliance, and working with all employees to foster a compliant environment. The Chief Compliance Officer reports compliance-related issues directly to the Chief Executive Officer and/or the Board of Directors, as deemed appropriate.

The Board of Directors has also established a Compliance Committee, composed of the members of the Board of Directors and the Chief Compliance Officer. The Compliance Committee advises and assists the Compliance Officer in administering the Compliance Plan.

#### **3. Training and Education**

An important element of Acorda’s Compliance Plan is educating and training employees and applicable vendors, consultants, and contractors about their legal and ethical

obligations under applicable laws, regulations, and Company policies. All new employees must complete such training as part of new hire orientation training, and existing personnel receive compliance training related to their job function on at least an annual basis. Acorda will also periodically review and update its training programs as needed.

#### **4. Internal Lines of Communication**

Acorda encourages employees to communicate openly on any issue of concern. Employees may bring any workplace matter, including questions about ethical situations or specific conduct and reports of potential violations of laws, regulations, or Company policies, to the attention of management without fear of retaliation or retribution.

Acorda expects all employees to promptly alert a supervisor, manager, or the Chief Compliance Officer about any possible legal violation or violation of Company policies. Employees may also report potential violations on an anonymous basis by calling Acorda's Corporate Governance hotline, available 24 hours a day, 7 days a week, at 1-888-774-8808 or by sending an email through a link available on Acorda's intranet page.

#### **5. Auditing and Monitoring**

The Chief Compliance Officer is charged with developing a plan to audit and monitor compliance with Acorda's policies, procedures and applicable laws and regulations. These audits are intended to identify potential or existing areas of concern and inform corrective actions designed to prevent the recurrence of non-compliance. The nature, frequency, and extent of compliance auditing and monitoring varies depending on a number of factors, including new regulatory requirements, changes in business practices, and other considerations.

#### **6. Responding to Potential Violations**

All Acorda employees, including management, are subject to disciplinary action, up to and including termination, for failure to adhere to the Company's compliance policies and procedures. Acorda strives for consistent application of its disciplinary actions.

#### **7. Corrective Action Procedures**

Acorda responds promptly to any potential compliance issues within the organization. When deemed appropriate, the Chief Compliance Officer or an individual designated by the Officer will conduct an investigation into any allegation of non-compliant activity. The Chief Compliance Officer may request the assistance of legal counsel and others, as needed. All employees must reasonably cooperate with any compliance investigation.

## **8. California Compliance Requirements:**

### **Annual Spending Limit**

In order to comply with California Health & Safety Code § 119402, Acorda, as part of its Compliance Plan, has set an annual dollar limit on promotional materials, educational items, food, and other items or activities that the Company may provide to medical or health care professionals in California, as defined in the statute

Acorda's annual aggregate limit on covered promotional expenditures is \$1,400 per covered medical or health care professional. This annual aggregate limit is meant to establish an upper spending limit on items covered under the California statute, but it is not necessarily a usual, customary, average or typical amount and may be revised at any time.

### **Declaration**

Under Acorda's continuing commitment to compliance with all applicable laws and regulations, the Company declares that, to the best of its knowledge and based on a good faith understanding of the statutory requirements, Acorda's Comprehensive Compliance Plan is consistent with California Health and Safety Code Sections 119400-119402. As of the date of this declaration, Acorda believes it is in compliance with its Compliance Plan, as described above, in all material respects.

Copies of this declaration and the Acorda Comprehensive Compliance Plan may be obtained by calling the following number: (914) 326-5249 or (914) 326-5203.

Dated: December 2014