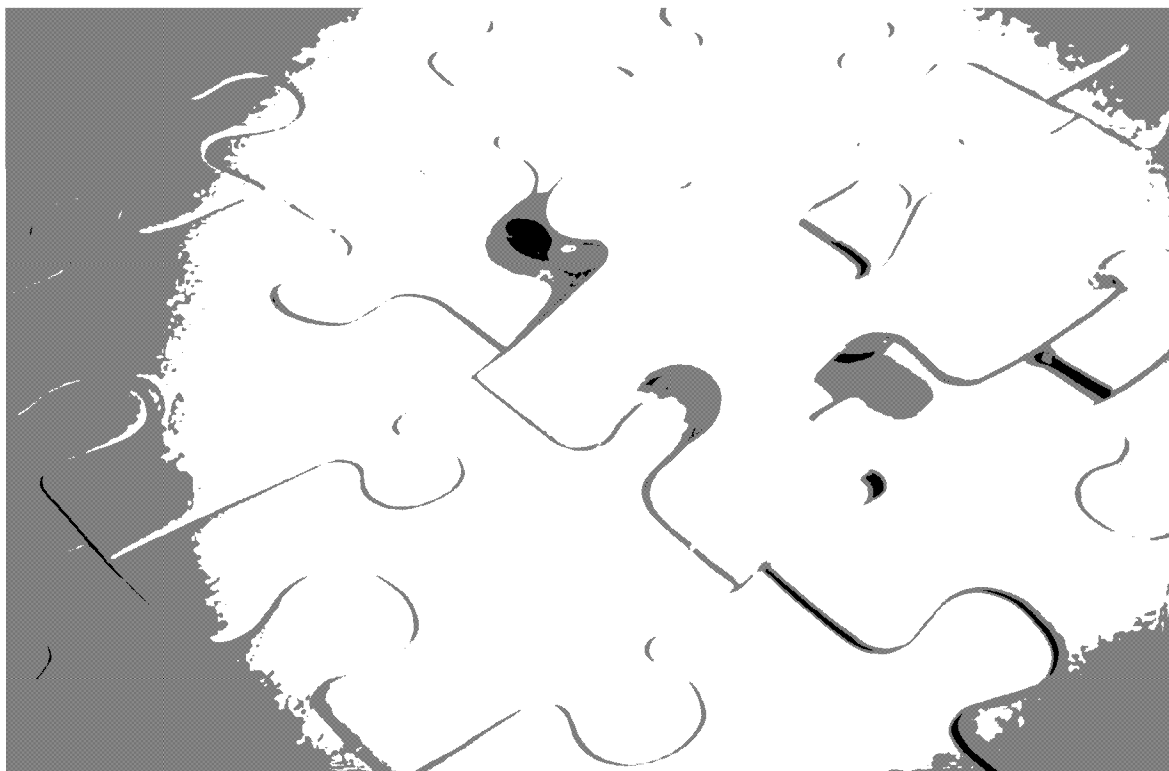


Exhibit 73



Quarterly Ethics
and Compliance
Report to Board of
Directors
for 4Q2015

Maggie Feltz
*Executive Director, Ethics &
Compliance*

March 09-10, 2016



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Bottom Line

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.

There have been no significant compliance issues in the 4th quarter, 2015.

This report focuses on:

- Positive review of Commercial Compliance program by outside counsel
- 2016 Ethics & Compliance Program Priorities
- Summary of Investigations
- Sunshine Act Update



Redacted

Commercial Compliance Program Enhancements



| <u>Category</u> | <u>Enhancement Opportunity</u> |
|-----------------------------------------------|-------------------------------------------------------------------------------------------------------|
| Sales Training | Provide enhanced training of Commercial management |
| Email Reviews | Implement email monitoring of field force |
| Ride-Alongs | Conduct 20 - 25 compliance ride-alongs each year |
| Engaging HCPs under Fee For Service contracts | Conduct annual overall needs assessment for all HCP consultant programs as part of the budget process |
| Criteria to Engage HCPs under FFS Contracts | Formalize the exact criteria consultants must meet to be eligible for each type of HCP consultancy |
| Audits of President's Club winners | Conduct reviews of sales force contest winners (both representatives and managers) |
| Monitor annual reviews of sales force | Monitor annual reviews of field force (and other formal written performance evaluations) |





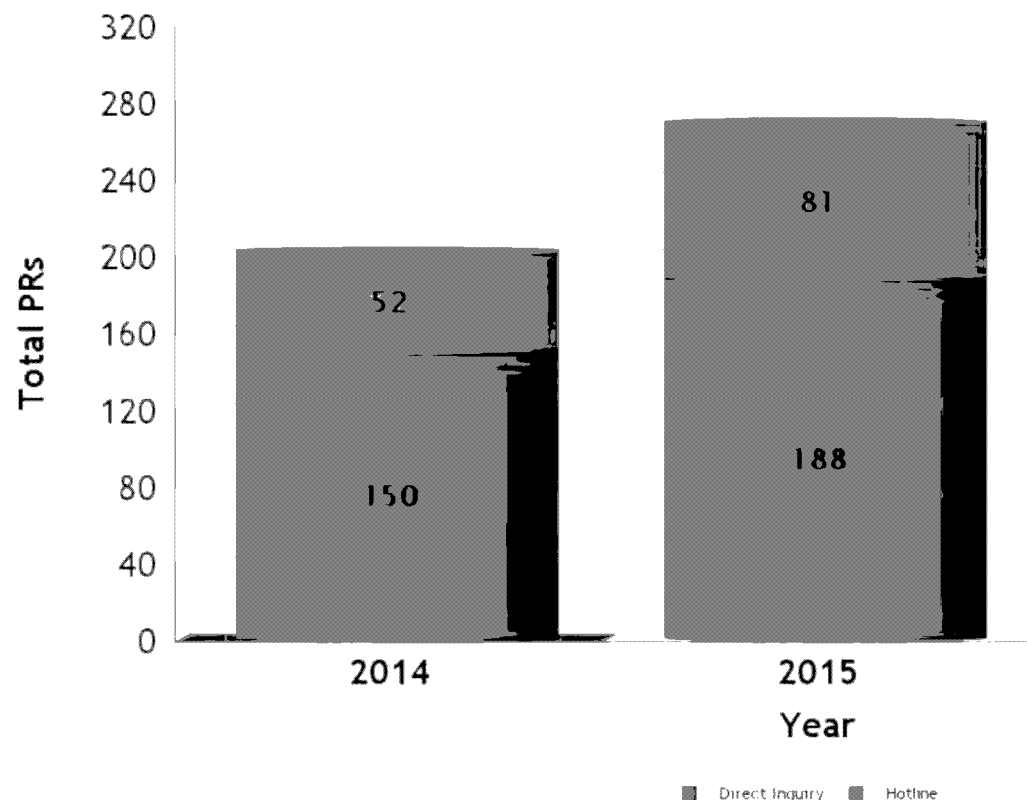
2016 Compliance Priorities

- An annual assessment of the most important areas of compliance risk is conducted each year, with a work stream that follows throughout the year focused on those risks.
- Risks are rated as high, medium and low (no high risks currently)
- Together with senior business heads, we are focusing on four areas deemed to present medium compliance risk, including:
 - Product Promotion training, focusing on:
 - Recently hired sales representatives
 - Further training for Commercial/Home Office Leadership
 - Managed Markets, focusing on new channels/customer segments
 - Field force Incentive Compensation
 - Speaker Programs





Compliance Matters - 2014 and 2015



- Majority of matters were field/marketing-related, mostly pertaining to promotional activity or speaker programs
- A second significant group of matters were referred to Medical Services (to be anticipated with new product launch)
- An additional significant category related to Sunshine Act questions from HCPs and Teaching Hospitals





2016 Sunshine Act filing (2015 data)

- Purdue's 2016 report will be filed on or before March 31, 2016
- Purdue's covered HCP and Teaching Hospital spend for 2015 was approximately \$18 million total, comprised of:
 - General Spend, \$10 million, includes items such as speaker programs, HCP in-office meals, and HCP marketing consulting spend; these items will be made public by CMS on June 30th
 - Research Spend, \$8 million, is delayed from CMS public posting to preserve confidential research activities





ALWAYS ► ALL WAYS

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