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Notice Regarding Update to Alkermes, Inc.'s Contract Pharmacy Policy (August 13, 2026)

August 13, 2026

Dear Covered Entity Customer,

Alkermes, Inc. is providing this notice to let you know that Alkermes has updated Attachment A to its Contract Pharmacy Policy ("Policy") Notice, which describes voluntary exceptions to the Policy for 340B covered entities located in certain states. Specifically, with this update, Alkermes has added voluntary exceptions to the Policy for 340B covered entities located in Illinois. Please see Attachment A for the effective dates of these exceptions. The remainder of the Policy, which is included below, remains unchanged.

Contract Pharmacy Policy Notice

In June 2024, Alkermes, Inc. announced implementation of its policy governing the eligibility of 340B covered entities to purchase Alkermes' products at the 340B price for shipment to a contract pharmacy.

As noted in its initial Policy announcement, Alkermes recognizes the important role of the 340B Program in serving uninsured and low-income patients and remains committed to ensuring that 340B covered entities have access to our products at the 340B price consistent with applicable law. However, Alkermes is concerned that contract pharmacy arrangements are diverting the benefits of the 340B Program from patients to contract pharmacies and contributing to the pervasive lack of transparency within the 340B Program, rendering it difficult to identify inappropriate duplicate discounts and product diversion. Despite implementation of the Policy outlined in our June 2024 announcement, Alkermes continues to face challenges in identifying inappropriate duplicate discounts, especially when product is dispensed at a designated contract pharmacy. Accordingly, Alkermes updated the Policy in December 2025 to add a claims submission requirement for product dispensed at a 340B covered entity's designated contract pharmacy. The Policy is subject to the voluntary exceptions for 340B covered entities located in certain states described in Attachment A to this notice.

Contract Pharmacy Policy

Eligibility for Contract Pharmacy Utilization

Alkermes provides the 340B ceiling price on product shipped to locations registered as a 340B covered entity (including its child sites) for dispensing through such covered entity's in-house pharmacy to its patients consistent with the 340B statute. Subject to the claims data policy described below, a 340B covered entity that lacks an in-house pharmacy may designate a single contract pharmacy location for shipment of Alkermes' products purchased at the 340B price. The designated contract pharmacy must be registered as a contract pharmacy location of the 340B covered entity in the Office of Pharmacy Affairs Information System (OPAIS) database.



Claims Data

Effective December 1, 2025, all 340B covered entities using a designated contract pharmacy must submit limited claims data for dispenses of product purchased at the 340B price and dispensed at the designated contract pharmacy. Claims data must be submitted using the Truzo platform at <http://truzo.kalderos.com/request> within 45 days of the dispense date, as detailed in Attachment C. Alkermes will use the submitted claims data to identify duplicate discounts and ensure compliance with the 340B Program.

340B covered entities that are dispensing 340B product through such covered entity's in-house pharmacy are requested to voluntarily submit claims data for all Alkermes' products purchased under the 340B Program within 45 days after the dispense date via the Truzo platform to support program integrity and transparency.

Scope of Policy

This Policy will be applicable for Alkermes' products listed in Attachment B. For a list of authorized distributors that distribute Alkermes' products at the 340B price, please visit <https://www.alkermes.com/getmedia/47f40518-b6f7-477b-bb22-701a6ea9e3df/Master-Alkermes-ADR.pdf>.

Alkermes makes voluntary exceptions to its Policy for 340B covered entities located in certain states, as described in Attachment A, which may be updated from time to time.

We are committed to a smooth implementation of this Policy and appreciate your continued support. If you have any questions about this letter, please contact truzo-support@kalderos.com.

Sincerely,

Signed by:

A handwritten signature in black ink that reads "Greg Apostol".

44815E2EC8A3412
Gregory Apostol

Vice President, Head of Market Access

Attachments



Frequently Asked Questions¹

Q: Which products are subject to Alkermes' 340B Contract Pharmacy Policy?

A: This policy applies to the Alkermes products listed in **Attachment B** and can be found on the Truzo website at <https://gotruzo.com/manufacturer-policies/>.

Q: Who needs to designate pharmacies on Truzo?

A: For the purposes of Alkermes' updated 340B Contract Pharmacy Policy, 340B covered entities that do not have an in-house (i.e., entity-owned) pharmacy, and who wish to use a contract pharmacy must designate their contract pharmacy on the Truzo platform.

Q: What is Alkermes' definition of an in-house pharmacy?

A: For the purposes of its 340B Contract Pharmacy Policy, Alkermes defines an in-house pharmacy as a pharmacy that is owned by, and is a legal part of, the 340B entity and listed as a street address or a shipping address of the 340B covered entity on the OPAIS database.

Q: Can my covered entity access Alkermes' 340B pricing at an in-house pharmacy that we own and operate, as well as at an in-house pharmacy that is on-site but owned and operated by a third-party?

A: No. Only 340B covered entities that lack an in-house pharmacy may designate a single contract pharmacy location for shipment of Alkermes' products purchased at the 340B price.

Q: If my covered entity does not have a pharmacy that it owns and operates, can we use an in-house pharmacy that is owned and operated by a third-party?

A: Yes. You may designate that in-house (i.e., on-site) contract pharmacy as your single contract pharmacy location for shipment of Alkermes' products purchased at the 340B price.

Q: My covered entity previously designated a contract pharmacy under the Alkermes 340B Contract Pharmacy Policy in the 340B ESP™ platform. Does my covered entity need to make a new contract pharmacy designation in the Truzo platform?

A: Yes. Effective December 1, 2025, Alkermes will begin using the Truzo platform to facilitate contract pharmacy designations under its updated 340B Contract Pharmacy Policy. 340B covered entities that made a contract pharmacy designation in the previous platform used by Alkermes must redesignate their one contract pharmacy via the Truzo platform to continue receiving access to Alkermes' products at the 340B price for that contract pharmacy. Instructions on how to designate a contract pharmacy on the Truzo platform will be provided by Kalderos.

¹ While the voluntary exceptions to the Alkermes, Inc. Contract Pharmacy Policy described in Attachment A are not reflected in these FAQs, the exceptions remain applicable to 340B covered entities located in the states identified in Attachment A.



Q: How often can I update my contract pharmacy designation?

A: Unless there is a material change to the eligibility status of a designated contract pharmacy, 340B covered entities will be permitted to update their contract pharmacy designation annually, based on the initial date of designation.

If there is a change to the eligibility of your designated contract pharmacy, please contact Kalderos' Covered Entity Concierge Team at truzo-support@kalderos.com for assistance.

Q: Does Alkermes require designated contract pharmacies to have a HIN assigned?

A: Yes. A contract pharmacy must have a HIN for a 340B covered entity to designate it as its single contract pharmacy location.

Q: If the contract pharmacy we want to designate does not have a HIN, how do we get one?

A: If you need guidance on how to get a HIN assigned to the contract pharmacy you would like to designate, please reach out to your wholesale distributor.

Q: How long does it take for my covered entity's designation of its single contract pharmacy location to take effect?

A: Your designation of an eligible contract pharmacy may take up to ten (10) business days to take effect.

Q: Can a child site designate a different contract pharmacy from its parent site?

A: No. All child sites must utilize the parent site's designated contract pharmacy.

Q: What does my covered entity need to do if it is not eligible to designate a contract pharmacy under Alkermes' 340B Contract Pharmacy Policy?

A: Nothing. You are not required to make pharmacy designations, for Alkermes, on Truzo.

Q: When should my covered entity start submitting claims data?

A: Effective December 1, 2025, all 340B covered entities using a designated contract pharmacy are required to submit limited claims data for dispenses of product purchased at the 340B price and dispensed at the designated contract pharmacy. Claims data must be submitted within 45 days of the dispense date, as detailed in **Attachment C** to the Contract Pharmacy Policy notice from Alkermes.

Additionally, to support transparency and reduce the 340B covered entity's burden related to good faith inquiries, 340B covered entities that are dispensing 340B product through their in-house pharmacies are encouraged to submit claims data for all Alkermes' products purchased under the 340B Program.



The Truzo platform is used to both designate pharmacies and submit claims data. After claiming and configuring your Truzo account, you can access the platform to submit your claims data at <http://truzo.kalderos.com/request>.

Q: What kind of claims data will I need to submit?

A: Please see **Attachment C** to the Contract Pharmacy Policy notice from Alkermes for details regarding the required claims data, which can also be found on the Truzo website at <https://gotruzo.com/manufacturing-policies/>.

Q: How often does my covered entity need to submit claims data?

A: 340B covered entities can submit claims data at a cadence that works for the entity, as long as the submission is within 45 days of the date of the dispense. For example, some 340B covered entities may choose to submit claims on a twice-monthly cadence.

Q: Will covered entities be charged any fees for using Truzo?

A: No. There are no fees associated with a 340B covered entity's use of Truzo.

Q: How do you ensure our data is secure?

A: Truzo features enterprise-grade security and architecture, utilizing end-to-end encryption for all data. API calls, user login activities, and authenticated user sessions are encrypted in transit using TLS 1.2 or higher and 2048-bit keys. Data stored at rest on servers and within databases uses AES-256 encryption.

Kalderos maintains compliance with all federal and state privacy laws. Kalderos' information security program aligns with the ISO 27001/2 and the NIST 800-53 Frameworks. Its robust SSAE 18 SOC 1 Type II and SSAE 18 SOC 2 Type II attestation programs enable Kalderos to annually demonstrate the operating effectiveness of its internal controls and compliance.

For additional information on Truzo's data privacy and security, please visit <https://www.kalderos.com/company/security>.

Q: How is the data my covered entity submits used?

A: Submitted claims data are compared to payer rebate invoices (e.g., state Medicaid Drug Rebate Programs) and other covered entity claims data to identify duplicate discount claims to 340B sales data. Additionally, submitted claims data may be used to evaluate potential diversion (excessive sales without matching utilization). For additional information on data usage, please see the Truzo covered entity terms and conditions available at http://info.kalderos.com/Truzo_CE_TsCs.

Attachment A – Voluntary Policy Exceptions (as of August 13, 2026)

Alkermes is making the voluntary exceptions set forth below to its Contract Pharmacy Policy.

Effective July 22, 2024 (the effective date of the Contract Pharmacy Policy):

- **Arkansas:** 340B covered entities located within Arkansas may direct shipment of Alkermes' products purchased at the 340B price to contract pharmacies located in Arkansas that are registered as a contract pharmacy location of the Arkansas 340B covered entity in the OPAIS database.
- **Louisiana:** 340B covered entities located within Louisiana may direct shipment of Alkermes' products purchased at the 340B price to contract pharmacies located in Louisiana that are registered as a contract pharmacy location of the Louisiana 340B covered entity in the OPAIS database.
- **West Virginia:** 340B covered entities located within West Virginia may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy registered as a contract pharmacy location of the West Virginia covered entity in the OPAIS database.
- **Mississippi:** 340B covered entities located within Mississippi may direct shipment of Alkermes' products purchased at the 340B price to contract pharmacies located in Mississippi that are registered as a contract pharmacy location of the Mississippi covered entity in the OPAIS database.
- **Maryland:** 340B covered entities located within Maryland may direct shipment of Alkermes' products purchased at the 340B price to contract pharmacies located in Maryland that are registered as a contract pharmacy location of the Maryland covered entity in the OPAIS database.
- **Kansas:** 340B covered entities located within Kansas may direct shipment of Alkermes' products purchased at the 340B price to contract pharmacies located in Kansas that are registered as a contract pharmacy location of the Kansas covered entity in the OPAIS database.

Effective August 1, 2024:

- **Minnesota:** 340B covered entities located within Minnesota may direct shipment of Alkermes' products purchased at the 340B price to contract pharmacies located in Minnesota that are registered as a contract pharmacy location of the Minnesota covered entity in the OPAIS database.

Effective August 28, 2024:

- **Missouri:** 340B covered entities located within Missouri may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy registered as a contract pharmacy location of the Missouri covered entity in the OPAIS database.

Effective March 3, 2025:

- **Kansas:** Alkermes removed the voluntary exception to the Policy for 340B covered entities located within Kansas.
- **West Virginia:** Alkermes removed the voluntary exception to the Policy for 340B covered entities located within West Virginia.



Effective May 5, 2025:

- **Nebraska:** 340B covered entities located within Nebraska may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy registered as a contract pharmacy location of the Nebraska covered entity in the OPAIS database.

Effective May 7, 2025:

- **Utah:** 340B covered entities located within Utah may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy registered as a contract pharmacy location of the Utah covered entity in the OPAIS database.

Effective July 1, 2025:

- **Hawaii:** 340B covered entities located within Hawaii may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy registered as a contract pharmacy location of the Hawaii covered entity in the OPAIS database.
- **South Dakota:** 340B covered entities located within South Dakota may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy registered as a contract pharmacy location of the South Dakota covered entity in the OPAIS database.
- **Vermont:** 340B covered entities located within Vermont may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy registered as a contract pharmacy location of the Vermont covered entity in the OPAIS database.

Effective August 1, 2025:

- **North Dakota:** 340B covered entities located within North Dakota may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy registered as a contract pharmacy location of the North Dakota covered entity in the OPAIS database.

Effective August 6, 2025:

- **Colorado:** 340B covered entities located within Colorado may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy registered as a contract pharmacy location of the Colorado covered entity in the OPAIS database.

Effective September 1, 2025:

- **Oregon:** 340B covered entities located within Oregon may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy registered as a contract pharmacy location of the Oregon covered entity in the OPAIS database.

Effective September 24, 2025:

- **Maine:** 340B covered entities located within Maine may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy registered as a contract pharmacy location of the Maine covered entity in the OPAIS database.

Effective October 1, 2025:

- **Rhode Island:** 340B covered entities located within Rhode Island may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy registered as a contract pharmacy location of the Rhode Island covered entity in the OPAIS database.



Effective October 6, 2025:

- **Louisiana:** 340B covered entities located within Louisiana may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy that is registered as a contract pharmacy location of the Louisiana 340B covered entity in the OPAIS database.
- **Mississippi:** 340B covered entities located within Mississippi may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy that is registered as a contract pharmacy location of the Mississippi covered entity in the OPAIS database.

Effective November 1, 2025:

- **Oklahoma:** 340B covered entities located within Oklahoma may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy that is registered as a contract pharmacy location of the Oklahoma covered entity in the OPAIS database.

Effective December 1, 2025:

- **Oklahoma:** Alkermes removed the voluntary exception to the Policy for 340B covered entities located within Oklahoma.
- **Arkansas, Colorado, Louisiana, Maine, Maryland, Minnesota, Mississippi, Missouri, Nebraska, North Dakota, Oregon, Rhode Island, South Dakota, Tennessee, Utah, Vermont:** 340B covered entities located within these listed states are not required to provide claims.

Effective January 1, 2026:

- **New Mexico:** The following 340B covered entities located within New Mexico may (1) direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy that is registered as a contract pharmacy location of the applicable New Mexico covered entity in the OPAIS database and (2) are not required to provide claim: federally qualified health centers and federally qualified health center lookalikes.

Effective June 11, 2026:

- **Washington:** 340B covered entities located within Washington (1) may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy that is registered as a contract pharmacy location of the Washington covered entity in the OPAIS database and (2) are not required to provide claims.
- **North Dakota:** Alkermes removed the voluntary exception to the Policy for 340B covered entities located within North Dakota.

Effective August 13, 2026:

- **Illinois:** 340B covered entities located within Illinois (1) may direct shipment of Alkermes' products purchased at the 340B price to any contract pharmacy that is registered as a contract pharmacy location of the Illinois covered entity in the OPAIS database and (2) are not required to provide claims.