



bright ideas that work

Arizant Inc. has in place a Comprehensive Compliance Program that is consistent with the applicable provisions of California State Bill 1765 (operative July 1, 2005), which requires companies to establish compliance programs accordance with the “Compliance Program Guidance for Pharmaceutical Manufacturers” published by the Office of Inspector General (OIG) of the Department of Health and Human Services, as well as policies that comply with the Pharmaceutical Research and Manufacturers of America (PhRMA) “Code on Interactions with Health Care Professionals.”

Arizant Inc. has established in its Comprehensive Compliance Program provisions that address interactions with health care professionals and a specific annual dollar limit on gifts, promotional materials, and/or items or activities that it may give or otherwise provide to an individual medical or health care professional in accordance with applicable provisions of the “Compliance Program Guidance for Pharmaceutical Manufacturers” and with the “Code on Interactions with Health Care Professionals.” For specific information on those provisions, and other details regarding the Comprehensive Compliance Program, please see the Arizant Code of Conduct on the Arizant web site at <http://www.arizant.com/arizant/pdf/601406A.pdf>.

Certification

To the best of its knowledge, information and belief, Arizant Inc. is in compliance, as of the above date, and in all material respects, with its Comprehensive Compliance Program and with its good faith understanding of the requirements of California Health and Safety Code §§ 119400-119402, as applicable to Arizant, Inc.

A copy of this document can be obtained by calling 1-800-800-4243 and asking for the Compliance Officer.