

IMC's Corporate Policy and Values

Declaration of Compliance

Informed Medical Communications (IMC) established a comprehensive Corporate Compliance Program that reflects our longstanding commitment to compliance with the laws, regulations, and guidelines that govern pharmaceutical promotional and marketing activities. We believe in upholding the same industry standards as the clients we serve, which are consistent with the recommendations set forth in “*Compliance Program Guidance for Pharmaceutical Manufacturers*,” published by the Office of Inspector General, U.S. Department of Health and Human Services in 2003, and the provisions of the “*Code on Interactions with Healthcare Professionals*” created by the Pharmaceutical Research and Manufacturers of America (“PhRMA Code”) and revised in 2002, as well as all applicable state laws and regulations.

IMC's policies and values, as outlined in our Corporate Compliance Program, are intended as guiding principles and practices. In the case of an IMC client's own compliance program, the rules and regulations that govern our business practices with regard to compliance will conform to the clients' policies as long as it is not associated with increased risks.

Medical Director/Compliance Officer (CO)

IMC operates under the guidance and support of our Medical Director/Compliance Officer, Jaime Nguyen, MD, MPH, who directly reports to Kathleen Bresette, President, and Steve Budd, CEO. Dr. Nguyen is responsible for administering all aspects of the Compliance Program, including policy development, compliance training, monitoring, and auditing.

Written Policies and Procedures

Written policies, procedures, and guidelines are key components of IMC's Corporate Compliance Program. IMC's written standards express our company's commitment to compliance and ethical business practices.

Our Corporate Compliance Program includes specific guidance and details as to the use of promotional materials and promotional activities, ensuring consistency with a product's approved label, interacting with Key Opinion Leaders (KOLs) and other healthcare professionals, and the proper communication of prescribing information and product data.

Training and Education

IMC is committed to providing effective training and education to all of our employees. All employees participate in annual mandatory certification training on the principles of the Corporate Compliance Program, which includes an online training program. Completing the certification training ensures that each employee understands and complies with Federal laws and regulations that relate to pharmaceutical marketing and promotion, such as the provisions

of the PhRMA Code, the American Medical Association's Ethical Guidelines and other relevant industry standards.

In addition, quarterly updates are provided throughout the year to reinforce key compliance concepts, and to ensure that all information and training remains relevant and current.

Internal Monitoring and Auditing

Ensuring compliance and quality control are essential parts of our Program and represents a consistent dedication to our clients. IMC's Corporate Compliance Program consist of internal monitoring, auditing and ongoing evaluations of our business practices, including our moderators in the field and other employees interacting with our clients and members of the medical community.

Reporting and Lines of Communications

IMC has established an internal process of communication between all employees and their immediate managers and the Compliance Officer. IMC encourages all employees to discuss any issues, concerns, problems and suggestions without fear of retaliation and with the assurance that the matter will be kept as confidential as possible.

IMC has an "open door" policy, and all employees have 24 hour access to all supervisors, managers, and the Compliance Officer.

Prompt Response and Corrective Action for Violations and Detected Problems

IMC's Corporate Compliance Program requires us to respond promptly to a potential deviation from law and/or our policy and values. All measures are taken -- to immediately address a situation and deter future violations from occurring. Sanctions and actions may range from oral warnings, re-training, and suspension to termination.

All compliance concerns, regardless of the method of communication, will be carefully reviewed and investigated on a case-by-case basis, and appropriately resolved to ensure future adherence to the law and IMC's Corporate Compliance Program.