

**LUNDBECK Inc. COMPREHENSIVE COMPLIANCE PROGRAM INCLUDING
California Health & Safety Code, §§ 119400-119402**

NOTICE OF COMPLIANCE: the ensuing information is provided pursuant to the requirements of California Health & Safety Code § 119402 (S.B. 1765) *Adoption of Comprehensive Compliance Program by pharmaceutical companies; contents of policy; annual dollar limits on certain items; drug samples; annual declaration of compliance*, which requires pharmaceutical companies doing business in California to make available their program for compliance with applicable federal and state laws and industry standards regulating the marketing and promoting of their products.

Introduction: Lundbeck Inc. has complied with the requirements of the California Health & Safety Code §§ 119400-19402 (S.B. 1765) through the establishment of a Corporate Compliance Program in accordance with the April 2003 United States Department of Health and Human Services, Office of Inspector General OIG Compliance Program Guidance for Pharmaceutical Manufacturers publication.

Compliance Program and Organization: Lundbeck Inc. is committed to full compliance with all applicable international, federal, state and local laws as well as all applicable industry and ethical standards. To ensure full compliance, Lundbeck has established a Corporate Compliance Program governed by the Lundbeck Inc. Corporate Ethics and Compliance Manual. The Lundbeck Board of Directors has the authority to appoint the Corporate Compliance Officer and has elected Dr. Erik Eglite, Vice President, Chief Compliance Officer, and Corporate Counsel, to serve in this capacity. Dr. Eglite serves as the Chairman of the Compliance Committee. With the assistance of the Compliance Committee, the Chief Compliance Officer is responsible for the overall implementation and maintenance of the Compliance Program.

Written Policies and Procedures: Lundbeck Inc. has written policies and procedures to assure substantial compliance with all applicable laws, rules, regulations and industry standards pertaining to interactions with health care professionals and the marketing and promotion of Lundbeck Inc. products. Included in the Lundbeck Inc. Comprehensive Compliance Program are policies that incorporate and take into account the April 2003 OIG Guidelines as well as the Pharmaceutical Research and Manufacturers of America (PhRMA) “Code on Interactions with Health Care Professionals,” dated July 1, 2002.

Lundbeck’s Compliance Policies govern all interactions with health care providers, including, but not limited to:

Meals:

It is Lundbeck Inc. policy that occasional meals may be offered to physicians and other health care providers in order to enhance the practice of medicine via exchange of information about Lundbeck products. Meals provided by field sales representatives or their immediate managers to physicians or other health care providers must be limited to in-office or in-hospital settings, modest in amount, not to exceed \$25 per individual.. If the off-site meal is to be conducted outside of the United States, the Corporate

Compliance Officer should be consulted in order to determine an appropriate limit per individual. Meals may not be provided to a health care provider's spouse, children, or other guests. However, if the meal is provided at the practitioner's office, it may be provided to the office staff as well as to the health care provider and any relevant support staff. A company representative must be present at every meal. All receipts submitted for reimbursement must list each health care provider that attended the Company-sponsored meal.

Gifts of Educational and Practice-Related Items: Providing items for healthcare professionals' use that do not advance disease or treatment education—even if they are practice-related items of minimal value (such as pens, note pads, mugs and similar “reminder” items with company or product logos)—may foster misperceptions that company interactions with healthcare professionals are not based on informing them about medical and scientific issues. Such non-educational items should not be offered to healthcare professionals or members of their staff, even if they are accompanied by patient or physician educational materials. It is appropriate, where permitted by law, to offer items designed primarily for the education of patients or healthcare professionals if the items are not of substantial value and do not have value to healthcare professionals outside of his or her professional responsibilities.

Entertainment: Provision of any type of entertainment (i.e., golf, sporting events, plays, concert tickets, etc.) is not allowed.

Educational Grants: In accordance with U.S. Department of Health and Human Services Guidance for Industry, Industry-Supported Scientific and Educational Activities Policy and ACCME Standards for Commercial Support, Lundbeck Inc. may provide grants for continuing medical education programs. Ovation will fund educational programs through appropriate organizations (e.g., CME providers) and institutions (hospital CME departments). All such grants are reviewed by the Medical Grant Review Committee.

Research Grants: Research Grants are evaluated for their scientific merit and rigor. They are conducted in accordance with all applicable laws, rules and regulations including, but not limited to, F.D.A., G.C.P. and privacy laws.

Compensation for Services: It is appropriate to pay fees to health care providers who serve as consultants, contractors, or other third party agents on behalf of Lundbeck Inc.. Payments are allowed in those instances where the services required are legitimate and necessary and if the payments represent fair market value and reasonable consideration for the services rendered. Consultants may only be selected based on their qualification and expertise and not with the intent to induce or in exchange for an explicit or implicit agreement or understanding that the Company's products and/or services will be used, purchased, prescribed or recommended.

Legitimate Travel Expenses of Healthcare Professionals: Reimbursement for travel, lodging and meal expenses for legitimate consulting services, whether it be for advisory boards, speaker's bureaus or clinical investigator meetings must be modest and

reasonable as judged by local standards. Travel, lodging and meal expenses may not be provided to a health care provider's spouse, children, or other guests.

Training and Education: Lundbeck Inc. is committed to educating and training its employees about the Compliance Program. All employees must be educated and trained about the standard operating procedures and policies related to the Compliance Program. In addition to the Compliance Program, each respective division must be trained on their particular applicable divisional policies and procedures.

Communication: Lundbeck Inc. encourages open and candid discussion between management and employees regarding compliance matters. It is the duty of every employee to report, in good faith, at the first opportunity he or she believes that a violation of Lundbeck Inc. policy has occurred. Employees may report suspected violations to their supervisor, the Compliance Officer, or any member of the Compliance Committee in writing or in person. Lundbeck Inc. has also provided a toll-free hotline that employees can use as well to make an anonymous report.

Auditing and Monitoring: Lundbeck Inc. is committed to robust and comprehensive monitoring and auditing of Lundbeck Inc. activities. The Compliance Committee or Compliance Officer will periodically audit various departments of Lundbeck Inc. to ensure compliance with applicable laws, regulations, and internal operating procedures. The Compliance Committee shall have the authority and financial resources to retain outside auditors as needed. The Compliance Committee shall audit at least one department of Ovation per year. The Committee may conduct additional audits as necessary. Each department may be subject to additional audits per year.

Response to Internal Monitoring and Auditing: The Compliance Committee will establish a corrective action plan in response to an actual violation. Suspected violations of Lundbeck Inc. policy and procedures will be investigated, and violators may be disciplined, all in a fair manner regardless of the suspected violator's position within the organization. Lundbeck Inc. may discipline all violators of Lundbeck Inc. policies and procedures. If the investigation by the Compliance Committee determines that an actual violation has occurred, then the corrective action plan established by the Compliance Committee shall be put into effect, which may include disciplinary action, up to and including termination of employment as necessary for any violators identified.

Limitations on Gifts or incentives provided to medical or health professionals: California law requires the Company to limit the annual dollar amount of gifts, promotional items and activities provided to medical or health care professionals. In fact each pharmaceutical company shall establish explicitly in its Comprehensive Compliance Program a specific annual dollar limit on gifts, promotional materials, or items or activities that the pharmaceutical company may give or otherwise provide to an individual medical or health care professional in accordance with the Compliance Program Guidance for Pharmaceutical Manufacturers and with the Code on Interactions with Health Care Professionals. Lundbeck Inc. has decided that it may not spend more than \$ 1,900 on gifts, promotional materials, or items or activities on an individual

California medical or health care professional in any fiscal year. This figure is a maximum limit and not a spending goal. The following items, however, are excluded from the scope of this gift policy: (1) drug samples for patients, (2) CME financial support, (3) health education scholarships that conform to the OIG and PhRMA guidelines, and (4) fair market value professional and consulting fees, along with associated reasonable expenses.

Annual Declaration for Purposes of California Health & Safety Code, §§ 119400-119402

Based upon a good faith understanding of the applicable statutory requirements of California Health & Safety Code, §§ 119400-119402, Lundbeck Inc. has established a Comprehensive Compliance Program that encompasses the compliance program requirements stated in California Health & Safety Code, §§ 119400-119402.

As of March 19, 2009, Lundbeck Inc. declares that it is, to the best of its knowledge and in all material respects, in compliance with California Health & Safety Code, §§ 119400-119402 and the Lundbeck Inc. Comprehensive Compliance Program.

Copies of the Lundbeck Inc. Comprehensive Compliance Program and declaration may be obtained by contacting Lundbeck Inc. at 847-282-1000 or at syou@lundbeck.com.