



CORPORATE COMPLIANCE

Corporate Ethics and Compliance Manual

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1.0 PRESIDENT'S LETTER



OVATION
Pharmaceuticals, Inc.

Jeffrey S. Aronin
President and Chief Executive Officer

Dear Colleague,

As President and Chief Executive Officer of Lundbeck Inc. (together with its subsidiaries, “Lundbeck” or the “Company”), I enthusiastically endorse the Lundbeck Corporate Compliance Program and our commitment to ethical and legal standards of conduct. Our goal is to accomplish our mission and to conduct our business with excellence, integrity, and responsibility. Compliance with governmental laws and regulations has never been more important than it is today. All of us are expected to follow the laws and policies for our jobs, to be honest, and to respect others.

To that end, this Corporate Ethics and Compliance Manual has been prepared to provide an overview of Lundbeck’s policies and procedures governing our business conduct. The Board of Directors has identified a Corporate Compliance Officer and has created a Compliance Committee to implement and monitor our Corporate Compliance Program and promote responsible decision-making by all employees. I am confident that this Manual, together with the Program, will help you resolve any ethical or compliance issue that may arise as part of your job.

I am relying on each of you to make every effort to conduct yourself in accordance with the Lundbeck’s ethical and legal standards of conduct in your dealings with colleagues, customers, business partners, regulators, and other members of society. I encourage each of you to embrace these standards as evidence of your personal commitment to uphold Lundbeck’s reputation as a well respected pharmaceutical company.

Sincerely,

Jeff

2.0 INTRODUCTION

Lundbeck is committed to full compliance with all applicable international, federal, state and local laws, rules and regulations as well as industry standards and ethical standards of business conduct. Furthermore, Lundbeck is committed to avoiding any distraction from its vital mission of developing, manufacturing, and supplying quality pharmaceutical products to patients. To meet these goals, Lundbeck has developed a Corporate Compliance Program.

The Program exhibits Lundbeck's commitment to ethical and legal standards of conduct and sets forth guidelines to prevent and detect any violation of the law. The Program also establishes a process for education, monitoring, and documentation of Lundbeck's efforts to obey the law. All members of the Board of Directors, officers, employees, contractors, business associates and agents of Lundbeck and its subsidiaries and affiliates are expected to comply with the Program.

This Corporate Ethics and Compliance Manual is intended to explain Lundbeck's policies to you and reinforce our commitment to the highest ethical and legal standards. Many, but not all, of Lundbeck's policies regarding compliance are described herein. Every employee, contractor and business associate must understand these policies and must report any and all violations to the Corporate Compliance Committee (see Section 4.3.1). Please refer to Section 3 of this Manual entitled "How to Handle and Report Ethical or Compliance Issues" for a description of what an employee should do if an ethics or compliance issue occurs on the job.

It is critical to Lundbeck's continued success that ethics and compliance be an integral part of every employee's decision making process. Inappropriate business ethics and/or poor compliance actions cannot and will not be tolerated and will be grounds for disciplinary action, up to and including termination of employment. Every employee has a responsibility to know applicable laws, rules and regulations and Lundbeck policies and procedures that apply to him or her in the course of their jobs. If there are procedures that apply to you or your job that you do not understand, you should ask to have them explained to you by your supervisor.

In Section 10 is an Employee Affirmation Letter that acknowledges that you have received this Manual and that you agree to comply with the policies described in it. This letter should be returned to Lundbeck's Human Resources Division as soon as you complete your review.

3.0 HOW TO HANDLE AND REPORT ETHICAL AND/OR COMPLIANCE ISSUES

3.1 Violations of Law or the Lundbeck Integrity Policy

Directors, officers, employees, contractors, business associates and agents of Lundbeck who know of or suspect violations of law or the Lundbeck Integrity Policy (Section 4.1) should immediately contact their supervisor, or if they are uncomfortable sharing a concern with their supervisor or not satisfied by the response, they may contact the Corporate Compliance Officer or any member of the Compliance Committee. Reports can be made in person or in writing. Employees can choose to remain anonymous if preferred by sending an unsigned letter in a confidential envelope to the Corporate Compliance Officer. Employees should not attempt to investigate known or suspected violations on their own. Failure to report a violation of law or of the Lundbeck Integrity Policy is itself a violation. Absolutely no retribution is permitted or will be tolerated for reporting possible violations in good faith.

To report a violation, in addition to the above, the following means are available:

1. Internet

Go on-line at <https://www.openboard.info/lundbeck/index.cfm> to access an Internet-based message interface that will deliver a message directly to the Lundbeck Compliance Committee. Be advised that to use this system with complete anonymity, you should send this message from an unidentifiable location such as a public library terminal.

2. Email

To send a message to the Lundbeck Compliance Committee via Lundbeck Microsoft Outlook: lundbeck@openboard.info. Be advised that sending a message from your business computer may not necessarily protect your anonymity. Use of a non-identifiable email address, like a Hotmail or Juno account, is the most confidential way of leaving a message.

3. VoiceMail

Call 866-352-2795 to leave a message with the Lundbeck Compliance Committee. Be advised that leaving a message on this voice mail system may not necessarily protect your anonymity. For complete anonymous reporting, please use the Internet interface.

3.2 Other Violations

If an ethical or compliance issue that does not involve a breach of law or of the Lundbeck Integrity Policy arises in connection with your job, your supervisor is often the best person to approach for assistance in resolving the issue. If your supervisor is not available, or you do not feel comfortable addressing the issue with your supervisor, you may discuss the issue with another manager in your department or with your manager's manager. Human Resources personnel are also available to discuss job-related concerns with you. If your

issue involves a particular area of expertise, such as regulatory or quality, you may wish to contact an individual within that department. If you are not sure who to contact for an ethical or compliance issue, the Corporate Compliance Officer or a member of the Lundbeck Compliance Committee is always available to help you.

4.0 CORPORATE COMPLIANCE PROGRAM

4.1 Lundbeck **Integrity Policy**



INTEGRITY POLICY

Corporate Integrity and Ethics

Lundbeck is committed to the highest standards of ethics, honesty, and integrity in pursuit of its mission. All members of the Board of Directors, officers, employees, contractors, business associates and agents are expected to adhere to these Standards of Conduct in the discharge of their duties.

Compliance with Laws and Regulations

Lundbeck is committed to obeying all applicable international, federal, state, and local laws, regulations and industry standards. It is the responsibility of each individual director, officer, employee, contractor, business associate and agent, to obey all applicable laws and regulations in the course and scope of his or her work for or on behalf of Lundbeck.

Work Environment

Lundbeck is committed to providing a work environment that is physically safe and free from discrimination and harassment. All directors, officers, employees, contractors, business associates and agents are expected to uphold Lundbeck 's commitment to ensuring quality working conditions.

Accounting Principles

Lundbeck is committed to ensuring that all of the Lundbeck's assets, profits, losses, and financial transactions are properly documented, fully accounted for, and promptly recorded in the appropriate books and records in conformity with applicable general accounting principles.

Fees to Consultants, Agents and Government Employees

Lundbeck is committed to legal remuneration in all of the Lundbeck's contractual arrangements. Payment of fees to health care practitioners, consultants, contractors, or other third party agents on behalf of Lundbeck are only 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. In addition, neither Lundbeck nor its employees or agents will make improper payments to government officials in order to influence substantive decisions of a judgmental nature by such government official.

Confidentiality

Lundbeck is committed to respecting and maintaining the confidentiality of personal and medical information. Lundbeck is committed to safeguarding confidential information and prohibiting its disclosure inconsistent with applicable law.

Conflict of Interest

Lundbeck is committed to avoiding any conflict of interest that offends the highest standards of corporate ethics, honesty, and integrity. All directors, officers, employees, contractors, business associates and agents are expected to not only disclose but also affirmatively identify potential or perceived conflicts of interest in their work on behalf of Lundbeck.

4.2 Corporate Compliance Officer

4.2.1 Appointment

The Lundbeck Board of Directors has the authority to appoint the Corporate Compliance Officer and has elected Dr. Erik R. Eglite, Vice President, Chief Compliance Officer, Corporate Counsel, to serve in this capacity. Dr. Eglite shall serve as the Chair of the Corporate Compliance Committee.

4.2.2 Responsibilities

With the active assistance, counsel and guidance of the Corporate Compliance Committee, the Corporate Compliance Officer shall have final authority and be responsible for the overall implementation and maintenance of the Lundbeck Compliance Program. Specifically, the Corporate Compliance Officer shall:

- Regularly review statutory and regulatory compliance matters and developments;
- Periodically monitor and audit departments of Lundbeck to assess their adherence with the Compliance Program and all applicable laws, rules regulations and industry standards;
- Train, educate, and update the Board of Directors, officers, employees, contractors, business associates and agents about the Compliance Program, as appropriate;
- Develop effective lines of communication;
- Assist departments of Lundbeck in implementing any corrective action plan, including enforcing standards through well-publicized disciplinary guidelines;
- Initiate and lead the activities and responsibilities of the Corporate Compliance Committee;

- Report and apprise the Board of Directors and CEO of significant issues impacting the compliance status of the Company.

4.2.3 Authority

The Lundbeck Corporate Compliance Officer shall have the authority to coordinate with all departments of Lundbeck on any compliance activity or matter. The Corporate Compliance Officer shall report directly to the Chief Executive Officer, and the General Counsel.

4.3 Compliance Committee

4.3.1 Membership

The Board of Directors has the authority to appoint the Lundbeck Compliance Committee and has elected the following individuals to serve as active advisory members on this Compliance Committee:

- Dr. Tim Cunniff, Vice President of Regulatory Affairs;
- Pat Morris, Esq., General Counsel and Vice President of Legal Affairs;
- Lance Williams, Vice President, Human Resources;
- Julie Hakim, Vice President Planning & Corporate Controller
- Dr. Mike Rice, Vice President, Quality Manufacturing, Assurance & Development;
- Dr. Robert Holt, Vice President Medical Affairs & Phase IV Clinical Affairs;
- Dr. Chris Silber, Vice President Clinical Affairs;
- Curtis Rhine, Chief Financial Officer;
- Mike Burke, Vice President of Sales & Marketing; and
- Dr. Erik Eglite, Vice President, Chief Compliance Officer, Corporate Counsel

4.3.2 Responsibilities

The Corporate Compliance Committee, under the direction of the Corporate Compliance Officer, will develop and implement internal controls and procedures that promote Lundbeck's adherence to all laws, rules, regulations, industry standards and requirements that apply to any aspect of the business. The Compliance Committee, under the direction of the Corporate Compliance Officer, will also monitor Lundbeck's commitment to compliance and the highest standards of ethical and just conduct. The goal of the Compliance Committee is to prevent, identify and correct unlawful and/or unethical behavior.

The Corporate Compliance Officer, with the advisement of the Compliance Committee, will have final authority to develop, implement, and maintain a Compliance Program for Lundbeck that will consist of:

- Written standards of conduct and policies/procedures that codify the Company's commitment to compliance;
- Regular education and training programs for all affected employees;
- An effective line of communication between the Corporate Compliance Officer, Human Resources and all employees and a confidential system/process by which compliance issues can be reported while protecting the anonymity of the complainant;
- An audit process to monitor compliance and to identify problem areas;
- A mechanism to perform independent investigations of potential compliance or ethical breaches;
- Policies to ensure that appropriate disciplinary actions are taken for any employee who is found to be guilty of non-compliance or misconduct; and
- A mechanism to report any self-discovered violations to appropriate federal, state, and local agencies within 60 days after a determination is made that there is credible evidence of a reportable violation.

4.3.3 Meetings

The Compliance Committee should meet quarterly. The Compliance Committee, under the direction of the Corporate Compliance Officer, shall have the authority to schedule additional meetings or to cancel scheduled meetings as necessary.

4.4 Education and Training

4.4.1 Mandatory Education and Training

Lundbeck is committed to educating and training its employees about the Compliance Program. All employees shall be educated and trained about the standard operating policies and procedures related to the Compliance Program. In addition to the Compliance Program, each respective division shall be trained on their particular applicable policies and procedures. Finally, corporate-wide electronic training will be conducted on an annual basis in regards to pertinent pharmaceutical industry laws and standards as well as important employment matters.

4.4.2 Schedule

All employees shall be educated and trained about the Compliance Program on an annual basis. New employees shall be educated and trained about the Compliance Program within 60 days of their date of hire. Additional or specific education and training sessions may be held as necessary to comply with any corrective action plan, to address new statutory or regulatory developments or as supplemental and reinforcement training as determined by the

Corporate Compliance Officer or Compliance Committee.

4.4.3 Documentation

Each employee shall certify in writing (either electronically or in writing) his or her completion of or attendance at the education and training sessions. Lundbeck shall maintain a training file for each employee and shall monitor these files periodically to ensure that each employee has obtained the required education and training in a timely manner.

4.5 Reporting and Remediation

4.5.1 Duty to Report

It is the duty of every employee to report, in good faith, at the first opportunity his or her belief that a violation of Lundbeck's Integrity Policy has occurred. Employees may report suspected violations to their supervisor, the Corporate Compliance Officer, or any member of the Compliance Committee in writing or in person. If a report is made in writing, then the report may be made anonymously, in which case the employee should give as much detail as possible in order to assist in the investigation of the suspected violation.

4.5.2 Response to Reporting

The Corporate Compliance Officer with the assistance and input from the Compliance Committee shall investigate all suspected violations of the Compliance Program. Lundbeck shall not take adverse action against any employee who in good faith reports a suspected violation of the Compliance Program in accordance with the standard operating policies and procedures and who was not involved in the suspected violation.

4.5.3 Corrective Action

With the assistance of the Compliance Committee, the Corporate Compliance Officer shall establish a corrective action plan in response to an actual violation. Suspected violations of the Lundbeck Integrity Policy will be investigated, and violators will be disciplined, all in a fair manner regardless of the suspected violator's position within Lundbeck.

4.5.4 Disciplinary Action

Lundbeck may discipline all violators of the Lundbeck Integrity Policy, dependant upon the nature of the violation. If the investigation by the Corporate Compliance Officer or the Compliance Committee determines that an actual violation has occurred, then the corrective action plan established by the Compliance Committee, with specific input and guidance from the General Counsel and Vice President of Human Resources, shall be put into effect,

which may include disciplinary action, up to and including termination of employment as necessary for any violators identified.

4.5.5 Documentation

The Compliance Committee, under the direction of the Corporate Compliance Officer, shall document its investigation of any report of a suspected violation of the Compliance Program. If its investigation results in the conclusion that an actual violation has occurred, then the Compliance Committee shall establish a corrective action plan. The Compliance Committee shall retain its records and documents for a period of seven (7) years from the date of creation.

4.6 Monitoring and Auditing

4.6.1 Mandatory Internal Monitoring and Auditing

The Compliance Committee, under the direction of the Corporate Compliance Officer, shall periodically audit various departments of Lundbeck to ensure compliance with applicable laws, regulations, and internal operating procedures. The Compliance Committee, under the direction of the Corporate Compliance Officer, shall have the authority and financial resources to retain outside auditors as needed.

4.6.2 Schedule

The Compliance Committee shall audit at least one department of Lundbeck per year. The Committee may conduct additional audits as necessary. Each department may be subject to additional audits per year.

4.6.3 Response to Internal Monitoring and Auditing

The Compliance Committee, under the direction of the Corporate Compliance Officer, shall establish a corrective action plan as necessary in response to an internal audit.

4.6.4 Response to External Monitoring and Auditing

Lundbeck is committed to cooperating with government investigators as required by law. If an employee receives a subpoena, search warrant, or other similar document, before taking any action, the employee must immediately contact the Corporate Compliance Officer and the General Counsel. The Corporate Compliance Officer and the General Counsel are responsible for authorizing the release or copying of documents. If a government investigator, agent, or auditor comes to a Lundbeck facility, the Vice President of Regulatory Affairs, Corporate Compliance Officer or the General Counsel must be contacted before an employee discusses any matter with such investigator, agent, or auditor.

With the assistance of the Compliance Committee, the Corporate Compliance Officer shall

establish a corrective action plan as necessary in response to an internal or external audit.

4.6.5 Documentation

The Corporate Compliance Officer shall document every audit. The Corporate Compliance Officer shall retain his or her records and documents for a period of seven (7) years from the date of creation.

5.0 PERSONAL ETHICS AND INTEGRITY

5.1 Conflict of Interest

Employees and officers of Lundbeck are required to avoid any situation in which their personal interest or that of a family member, friend, or associate might affect or restrain their actions, restraint from actions, or decisions in the course of normal business activities. Employees and officers must not accept any gift or entertainment that is intended to, may appear to, or in fact does improperly influence the way Lundbeck conducts business. Employees also must not offer any gift or entertainment that is intended to, may appear to, or in fact does improperly influence those with whom Lundbeck conducts business. If there is any question regarding this matter, please contact the Corporate Compliance Officer.

5.2 Disclosure of Confidential and Proprietary Information

Lundbeck owns intellectual property that is of great economic value to Lundbeck, and all employees must safeguard and, in accordance with the Lundbeck Non-Disclosure Agreement, not disclose Lundbeck's proprietary information to unauthorized parties.

5.3 Securities Laws

Lundbeck is committed to compliance with international, federal, state and applicable local securities laws to eliminate fraud and deceptive practices in the purchase and sales of securities. No employee should purchase or sell securities of Lundbeck when that employee has material, non-public information with respect to Lundbeck. To avoid even the appearance of impropriety, Lundbeck may request that certain employees not purchase or sell securities of another company. All employees are required to follow such requests.

6.0 WORK ENVIRONMENT

6.1 Health and Safety

Lundbeck is committed to complying with all applicable federal and state laws, regulations, and policies governing working conditions and the health and safety of workers, including those established by the US Occupational Safety and Health Administration (“OSHA”) and the US Department of Labor.

6.2 Nondiscrimination/Harassment

Lundbeck is committed to the principles of equal opportunity and affirmative action. Lundbeck does not discriminate on the basis of race, color, religion, sex, national or ethnic origin, age, disability, sexual orientation, or military service in its employment policies.

Any employee who experiences harassment or discrimination on the basis of race, color, religion, sex, national or ethnic origin, age, disability, sexual orientation, or military service should immediately seek assistance by contacting the Human Resources Department or the Corporate Compliance Officer. Lundbeck prohibits retaliation against any employee who utilizes such resources in good faith to make complaints of harassing or discriminatory conduct.

6.3 Debarment and Exclusion

Lundbeck shall not hire or enter into contracts with individuals or entities who have been convicted of health care related violations or who are listed as debarred, excluded, or otherwise ineligible to participate in federal health care programs. Lundbeck shall conduct due diligence as part of the decision-making process in hiring and retaining individuals and entities and in engaging in business relationships with individuals and entities.

6.4 Privacy

Lundbeck is committed to safeguarding the privacy of the personal and health information of its employees. Lundbeck shall comply with all applicable international, federal, state or local laws, regulations, and policies governing the protection of privacy, including the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”).

7.0 RESEARCH, DEVELOPMENT AND REGISTRATION

7.1 Contracting and Funding

All clinical protocols developed by Lundbeck will be designed to provide valuable scientific and clinical information. Clinical investigators retained to conduct each protocol may only be selected based on their qualification and expertise and not on their past, present, or future use of Lundbeck products. Payment of fees to clinical investigators or their institutions will be reasonable (fair market value) and based on the work performed by the investigators and their staff.

7.2 Good Clinical Practices

Lundbeck values scientific integrity and is committed to conducting clinical research studies in accordance with internationally recognized standards for Good Clinical Practices. Lundbeck shall maintain all research data obtained in accordance with federal and international record keeping requirements and shall publish all relevant information obtained from clinical studies sponsored by Lundbeck that could influence medical practice.

7.3 Privacy and Confidentiality

Lundbeck is committed to complying with all applicable international, federal, state, or local laws, regulations, and policies governing privacy and confidentiality, including HIPAA. Lundbeck shall take necessary measures to protect individually identifiable personal data obtained through research, development, regulatory, and marketing activities. Lundbeck shall maintain written policies and procedures with respect to the collection, reproduction, examination, analysis, transference, archival, or destruction of personal data recorded in any media, whether electronic or otherwise. Lundbeck shall not only protect personal data obtained from research subjects, but also data about investigators, clients, customers, and suppliers. Where necessary, Lundbeck shall receive appropriate consent or authorization to use or disclose any personal data collected or received.

7.4 Regulatory Submissions

All data submitted in regulatory applications by Lundbeck will be reviewed and, to the best of the Company's knowledge, will be certified to be true and accurate. Upon marketing approval, all applications will be maintained according to applicable laws and regulations and labeling will be routinely updated with new safety information that may reasonably affect the statement of contraindications, warnings, precautions, or adverse reactions.

8.0 MANUFACTURING AND DISTRIBUTION

8.1 Good Manufacturing Practices

Lundbeck is committed to complying with current Good Manufacturing Practices during the, manufacture, testing, packing, and storing of its products. Lundbeck shall oversee contract manufacturing and analytical testing facilities to ensure that all products distributed under the Lundbeck name have the identity and strength and meet the quality and purity characteristics that they are represented to possess.

8.2 Intellectual Property

Lundbeck is committed to complying with all applicable intellectual property laws of the countries in which the Company operates. Lundbeck shall not infringe on patents, trademarks, or copyrights of third parties and shall not seek to obtain trade secrets from third parties.

8.3 Customs and Export Controls

Lundbeck is committed to complying with all applicable import and export controls of the countries in which the Company operates. As a corporation with headquarters in the United States, Lundbeck shall respect all embargoes and international boycotts imposed by the U.S. federal government. Employees must not enter into business dealings with restricted countries, individuals, or entities.

8.4 Product Recall

Lundbeck shall remove any of its drug products from the domestic and foreign markets in the event of the discovery of an unacceptable health hazard or risk associated with its use. Lundbeck shall submit applicable reports to regulatory authorities for any product that fails to meet established specifications during ongoing analytical testing, and Lundbeck shall discuss with these authorities the disposition of such product.

9.0 SALES AND MARKETING

9.1 Fair Trade Practices

Lundbeck is committed to complying with all applicable federal and state laws, regulations, and policies governing antitrust, deceptive trade practices, and consumer protection. Lundbeck shall not set charges in collusion with competitors, enter into unlawful exclusive arrangements with vendors, or share confidential information with competitors. Lundbeck shall not furnish misleading or false information about its products to its consumers.

9.2 Prescription Drug Marketing

Lundbeck shall implement practices to ensure that none of its products are diverted from appropriate channels of distribution. Lundbeck shall administer its prescription drug sampling program in full compliance with the Prescription Drug Marketing Act (“PDMA”), and Lundbeck shall monitor and report to appropriate authorities any potential or actual diversion of drug samples.

Lundbeck shall not engage in promotional programs regarding the use of any of its products for indications or uses not approved by the appropriate regulatory authorities, including the U.S. Food and Drug Administration (“FDA”). Any dissemination of off-label information regarding an Lundbeck product to a health care practitioner, a pharmacy benefit manager, a health insurance issuer, a group health plan, or a federal or state government agency shall fully comply with Lundbeck procedures. Off-label promotion is strictly prohibited.

9.3 Fraud and Abuse

Lundbeck is committed to complying with all federal and state laws, regulations, and policies governing fraud and abuse, including the Anti-Kickback Law, the Civil Monetary Penalty Statute, the Office of Inspector General (“OIG”) Compliance Guidance for Pharmaceutical Industry, and the Pharmaceutical Research and Manufacturers of America (“PhRMA”) Code on Interactions with Health Care Professionals. No director, officer, employee, contractor, business associate or agent may solicit, accept, offer, or give gifts, gratuities, or favors of any kind in the performance of Lundbeck’s business, if it will appear to obligate, or will actually obligate, the person who receives it, or if solicited or offered for the purpose of influencing the business decision of the person who receives it. Receiving or giving gifts of cash is never allowed. The meaning and perception of the solicitation, acceptance, offer or giving of non-monetary gifts, gratuities or personal benefits or favors may be interpreted in a variety of ways by different people depending on the situation.

9.4 Pricing Calculations

Lundbeck is committed to ensuring that all data used in calculations performed for purposes of determining pricing under government programs shall be determined in accordance with applicable law.

10.0 EMPLOYEE AFFIRMATION LETTER

All directors, officers, employees, and onsite workers, including temps shall certify by signing below that they have received a copy of the Corporate Ethics and Compliance Manual. Signed copies of this letter will be sent to the Department of Human Resources.



EMPLOYEE AFFIRMATION LETTER

I acknowledge that I have received the Lundbeck Corporate Ethics and Compliance Manual.

I understand that every employee of Lundbeck and its subsidiaries and affiliates is required to comply with the policies described and/or referenced in this Manual and that failure to comply may subject an employee to disciplinary action, including dismissal from employment.

When I have a concern about a possible violation of the law or Lundbeck's Integrity Policy, I will immediately report it to my supervisor. If I am uncomfortable sharing a concern with my supervisor or am not satisfied with the response I receive from them, I will communicate my concern to the Corporate Compliance Officer or another member of the Compliance Committee.

Name (please print): _____

Signature: _____

Date: _____

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