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HARVARD DRUG GROUP, LLC

Rx Brands/Generics & MAJOR Consumer Products

Harvard's Commitment to Ethics and Compliance

Harvard is committed to the highest standards of ethical conduct and corporate compliance. Based upon our good faith understanding and to the best of our knowledge, we have established a Comprehensive Compliance Program that is reasonably designed to prevent and detect violations of our Standards of Conduct and applicable laws and regulations. Our Program is tailored to the size, organizational structure, operational activities and resources of Harvard to meet compliance goals consistent with our corporate ethics and with the statutory requirements of Cal. Health and Safety Code §§119400-119402.

The Harvard's Comprehensive Compliance Program recognizes that compliance is dynamic. It provides for revisions when necessary to reflect changes in company operations, the Compliance Program Guidance for Pharmaceutical Manufacturers published by the Office of Inspector General for the U.S. Department of Health and Human Services, the PhRMA Code on Interactions with Health Professionals, and applicable laws.

To the best of our knowledge, we are in material compliance with the Comprehensive Compliance Program as described, meaning that we have established the elements outlined and have set up procedures to implement the program's requirements. This declaration is made as of July 1, 2005.

To obtain a written copy of this declaration or our Comprehensive Compliance Program, you may call 1-800-875-0123 Ext. 6180