

Compliance Program

Ferndale Laboratories, Inc. is dedicated to discovering, developing and delivering unique, value-added Dermatology therapies that heal, protect and beautify the skin. We value the quality of our relationships with healthcare professionals and their patients. Individual integrity, ethical conduct and compliance with the many laws and regulations that govern the healthcare community in the United States are essential to these relationships.

To help ensure that our sales and marketing practices are conducted in a responsible manner, we make the following commitments:

PhRMA Code

We comply with the PhRMA Code on Interactions with Healthcare Professionals. Our relations with healthcare professionals focus on the meaningful exchange of medical information, enhancement of the practice of medicine and patient health.

Support for Medical Education

We support medical education through grants to appropriate institutions or entities, not to individuals or physician practices. Where applicable, grants comply with ACCME and FDA guidelines, and we have no influence over the content of the program or the selection of speakers. Ferndale Laboratories, Inc funds may not be used to pay for the costs of travel, lodging or other personal expenses of non-faculty healthcare professionals attending educational conferences or meetings.

Meals, Gifts and Entertainment

We will pay for a modest meal with a healthcare professional if the meal occurs in the context of providing medical information. Because these meals are intended to facilitate a professional discussion, spouses or guests may not attend. Gifts or entertainment, of any kind, are not permitted. Items primarily for the benefit of patients or to enhance the practice of medicine may be offered to healthcare professionals if they are not of substantial value and offered infrequently. These gifts may include medical textbooks and other items that serve a genuine educational need. Additionally, promotional items of nominal value are also permissible (e.g., notepads, pens, calendars, etc.) provided that they are related to a physician's practice.

Compensation for Services

We compensate healthcare professionals for legitimate and *bona fide* services provided a signed contract exists and compensation is at fair market value.

Product Discussions

We provide objective and balanced information about our products that complies with FDA regulations and conforms to the information approved by FDA.

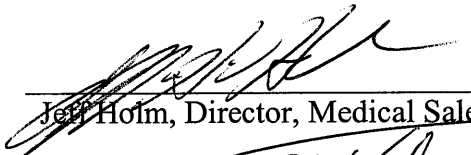
Patient Privacy

Ferndale Laboratories, Inc respects the personal health information of consumers. Ferndale Laboratories, Inc does not disclose or otherwise use such personal health information without consent.

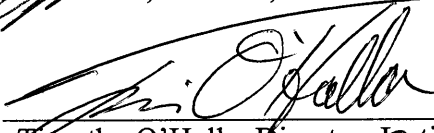
Samples

We distribute samples in compliance with regulations to provide an opportunity for the physician and patient to determine tolerability and effectiveness in an appropriate patient. Samples may never be resold, redistributed or submitted for payment.

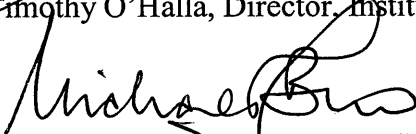
If you have questions or concerns relating to Ferndale Laboratories, Inc. sales and marketing practices, please contact your Ferndale Laboratories, Inc. sales representative. You may also send e-mail to: sales@ferndalelabs.com.



Jeff Holm, Director, Medical Sales Division



Timothy O'Halla, Director, Institutional Sales Division



Michael Burns, Ph.D., President & COO