

HOLLISTER INCORPORATED
COMPREHENSIVE COMPLIANCE PROGRAM

Description of Comprehensive Compliance Program

Hollister is committed to conducting business ethically and in accordance with applicable laws, regulations and industry codes. As part of our ongoing compliance efforts and consistent with the United States Department of Health and Human Services Officer of Inspector General (OIG's) guidance to Pharmaceutical Manufacturers (the "OIG Guidance"), we have developed a Comprehensive Compliance Program that is tailored to the size and nature of our business as a medical device manufacturer. Our Comprehensive Compliance Program includes the elements of an effective compliance program included in the OIG Guidance.

Written Policies and Procedures

Hollister develops and distributes written policies and procedures which set forth our commitment to compliance and provide guidance to Hollister Associates. Our policies are aligned with the Advanced Medical Technology Association Code of Ethics ("AdvaMed") and govern interactions with healthcare professionals. Hollister has established a specific annual dollar limit on gifts and business meals that Hollister may provide to individual health care professionals in California.

Compliance Officer and Compliance Committee

Hollister has designated a Compliance Officer who has direct access to the board of directors. Hollister has a Compliance Committee that is responsible for overseeing the Compliance Program.

Training and education

Hollister develops and conducts regular and effective training and education for Associates that is applicable to their responsibilities.

Effective Lines of Communication

Hollister has effective lines of communication between its Compliance Officer and its Associates, including a Helpline which is available for questions, reports or potential concerns. Hollister will not retaliate against individuals who ask questions or raise concerns.

Internal Monitoring and Auditing

Hollister uses audits and other risk evaluation techniques to monitor compliance, identify risk areas and assist in the reduction of any identified issues.

Exclusion Screening and Disciplinary Guidelines

Hollister takes steps to ensure that it does not employ or retain individuals or entities that are excluded from participation in federal healthcare programs. Hollister also enforces appropriate disciplinary action against those who violate company policies or procedures or applicable law.

Investigative Policies and Procedures

Hollister has appropriate policies and procedures for the investigation of alleged misconduct or noncompliance which includes undertaking of any necessary corrective action.

HOLLISTER INCORPORATED
CALIFORNIA DECLARATION OF COMPLIANCE

Hollister Incorporated has established a Comprehensive Compliance Program which, based on our understanding of the statutory requirements applicable to medical device companies, complies with the applicable requirements of California Health and Safety Code Chapter 8, Sections 119400-119402. Our Comprehensive Compliance Program is tailored to the size, business activities and resources of our company and is in alignment with the Advanced Code of Ethics on Interactions with Health Care Professionals, the voluntary ethical code established by the medical device industry.

To our knowledge, we are in compliance with our Comprehensive Compliance Program and the applicable requirements of California Health and Safety Code Chapter 8, Sections 119400-119402 in all material respects.

For a copy of this document, please call Hollister at 1-800-645-1837.