

## **Summary of GE Healthcare's Comprehensive Compliance Program Pursuant to California Health and Safety Code §§ 119400-119402**

### **I. Introduction**

Pursuant to the CA Health and Safety Code §119402, enacted on September 29, 2004, GE Healthcare adopted a comprehensive Compliance Program in accordance with the April 2003 Compliance Program Guidance for Pharmaceutical Manufacturers issued by the United States Department of Health and Human Services, Office of Inspector General ("OIG") and the Pharmaceutical Research Manufacturers of American ("PhRMA") Code on Interactions with Healthcare Professionals.

The following is an overview of the fundamental elements of our Compliance Program.

### **II. Policies and Procedures**

GE HEALTHCARE has established a comprehensive Compliance Program, which includes GE's Spirit and Letter policies, the GE Healthcare Global Customer Relations Code of Conduct, and US Customer Codes of Conduct for each of GE HEALTHCARE's three businesses: Technologies, Life Sciences and Medical Diagnostics. All Codes of Conduct and policies are in accordance with federal, state, and industry regulations and guidelines, including the National Electronic Manufacturers Association (NEMA) Code, the PhRMA Code on Interactions with Healthcare Professionals and the Office of the Inspector General Compliance Program Guidance for Pharmaceutical Manufacturers.

GE HEALTHCARE has dedicated significant time and resources to implementing a Compliance Program that includes a comprehensive framework of compliance controls throughout various segments of our commercial operations. Our Compliance Program is a representation of our commitment to the highest standards of corporate conduct and integrity.

### **II. Compliance Organization**

As a global company, GE HEALTHCARE's Compliance Program reflects our overall compliance with US and national laws, including the elements specifically implemented to comply with California law.

GE HEALTHCARE's compliance organization is comprised of Global Policy Leaders organized into various global compliance teams and regional and P&L compliance champions representing GE HEALTHCARE's global P&Ls in the Americas, Europe and Asia.

As recommended by the OIG Guidance, GE HEALTHCARE has designated this global compliance team to assist in the implementation of the Compliance Program. The team meets regularly to review the Company's compliance efforts and modify our policies and procedures as needed to respond to changes in the Company's needs and applicable federal law. The global compliance team also has the authority to recommend and effectuate changes within the Company as needed.

### **III. Effective Training and Education**

Training and education of our employees on their legal and ethical obligations under applicable healthcare laws and Company policy are critical components of our Compliance Program. GE HEALTHCARE's employee training program consists of mandatory business-based and global training and education on our company's policies and procedures, with annual refresher courses via online learning modules. GE HEALTHCARE will continually review and update its training program on an "as needed" basis.

#### **IV. Effective Lines of Communication**

GE HEALTHCARE is committed to fostering dialogue between management and employees. GE HEALTHCARE requires every employee, officer, and director to ask questions, seek guidance, report suspected violations, and express concerns regarding compliance with the Company's Compliance Program. Any employee, officer or director who knows or believes that any other employee or representative of the Company has engaged or is engaging in Company-related conduct that violates applicable law or this Code must report such information to his or her supervisor or to the Legal Department.

#### **V. Monitoring and Auditing**

GE HEALTHCARE's Compliance Program includes the processes by which the Company will monitor and evaluate whether there are policies and procedures adequately addressing risk areas and whether there is compliance with the policies and procedures. The nature and frequency of our reviews varies according to a number of factors, such as new regulatory requirements and changes in business practices.

#### **VI. Responding to Potential Violations & Corrective Action**

GE HEALTHCARE supports prompt response and corrective action for any detected problems. The Company has established robust compliance communications mechanisms, including a GE Healthcare Ombuds Program, which provides a process for reporting concerns of ethical or compliance violations. GE HEALTHCARE investigates all reported incidents of potential compliance violations in a timely manner, and, where appropriate, will implement corrective action and preventive measures. Employees who violate Company policies and procedures or applicable federal and state laws are subject to disciplinary action, up to and including termination.

#### **VII. California Spend Limit**

GE HEALTHCARE's comprehensive Compliance Program includes a US Medical Diagnostics Customer Code of Conduct in compliance with the PhRMA Code on Interactions with Health Care Professionals. The Code of Conduct sets limits on gifts or incentives provided to medical or healthcare professionals.

GE HEALTHCARE has determined that the annual aggregate limit on covered promotional expenditures is \$1,500 per health care professional for annual periods commencing on July 1, 2006. It is important to note that GE HEALTHCARE's annual aggregate limit represents a maximum limit and is not a spending goal. This limit does not represent a usual, customary, average or typical amount for healthcare professionals.

Rather, this annual aggregate limit is based on an estimate of the maximum value of gifts, promotional materials and other items or activities that a health care professional may receive in one year. In tracking expenditures, the Company excludes from its limit the following items that are exempt under California law: (1) drug samples given to health care professionals for free distribution to patient; (2) financial support for continuing medical education forums; (3) financial support for health educational scholarships; and (4) payments made at fair market value for legitimate professional services provided by healthcare professionals. Additionally, GE HEALTHCARE does not track items of *de minimis* value (e.g., less than \$25.00), such as pens and notepads that relate to the healthcare professional's work.

In setting this limit, we have taken into account the size of GE HEALTHCARE's Medical Diagnostics business and the size of our product portfolio. As the size of the Company and product portfolio changes, this limit may be revised by GE HEALTHCARE.

## **Annual Declaration of Compliance**

[Click here](#) for the 2007 GE HEALTHCARE Annual Declaration of Compliance.

## **Codes of Conduct**

[Click here](#) for the GE HEALTHCARE Medical Diagnostics US Customer Code of Conduct  
([http://data.supportcentral.ge.com/upload/33120/doc\\_819941.pdf](http://data.supportcentral.ge.com/upload/33120/doc_819941.pdf))

[Click here](#) for the GE HEALTHCARE Global Customer Relations Code of Conduct  
([http://data.supportcentral.ge.com/upload/33120/doc\\_819929.doc](http://data.supportcentral.ge.com/upload/33120/doc_819929.doc))

Copies of the GE Healthcare MDX US Customer Code of Conduct and Written Declaration of Compliance may be obtained by calling the following toll free number: 1-800-654-0118, option #5.