



California Pharmaceutical Marketing Compliance Law Declaration

With this statement, dated January 1, 2010, InterMune declares that the Company is in compliance with California Health and Safety Code §§ 119400 and 119402 (2005), which relate to pharmaceutical marketing practices and gifts, payments, and other incentives provided to healthcare professionals. InterMune also hereby declares that the Company is in compliance with its Comprehensive Compliance Program, described briefly below.

As required by California Law, InterMune has implemented a Comprehensive Compliance Program in accordance with the Office of Inspector General of the Department of Health and Human Services April 2003 *Compliance Program Guidance for Pharmaceutical Manufacturers* ("OIG Guidelines"). This Comprehensive Compliance Program, a copy of which is available on this website, includes policies for compliance with the Pharmaceutical Research and Manufacturers of America January 2009 *Code on Interactions with Healthcare Professionals* ("PhRMA Code"). As a key part of the Comprehensive Compliance Program, InterMune has implemented numerous standard operating procedures and corporate policies on marketing practices and interactions with healthcare professionals, including an annual dollar spending limit of \$3,000 per individual healthcare professional. The Company has trained and continues to train employees on these policies on a regular basis. A Compliance Committee, chaired by a Chief Compliance Officer, has been established to guide and foster communication with employees, to monitor employee compliance with Company policies, and to take corrective and/or disciplinary action when necessary. InterMune has strictly adhered to its Comprehensive Compliance Program and will update the Program as necessary to reflect any revisions to either the OIG Guidelines or the PhRMA Code.

Any interested party can call toll-free 877-862-2292 to request a printed copy of this declaration or further information regarding InterMune's Compliance Program.