

**Eli Lilly and Company's
Declaration of Compliance
with its
Comprehensive Compliance Program**

As part of Eli Lilly and Company's continuing efforts in the area of compliance, Lilly has developed a Comprehensive Compliance Program (CCP), as required by California Law, and hereby declares as required by that law (California Health & Safety Code §119402(e)), that to the best of our knowledge, Lilly is, in all material respects, in compliance with its CCP as described in the Summary of Eli Lilly and Company's [Comprehensive Compliance Program](#), and the requirements of Cal. Health & Safety Code § § 119400-119402.

Lilly has developed and implemented elements of its CCP to address certain issues uniquely raised by the California law, and will continue to refine these compliance elements as necessary. In addition, compliance is a dynamic concept that must be continuously adapted to the characteristics of a particular company, and to the changing environment in which the company operates. In recognition of these things, Lilly constantly reassesses its CCP to improve it, and it is both possible and likely that we will do so during the coming year. Lilly reserves the right to make changes to its CCP at any time during the year to meet its compliance needs.

In making this declaration of compliance, Lilly is not asserting or making any sort of representation that every employee, agent, contractor, partner, or vendor will always fully comply with its CCP; or that Lilly can prevent individual employees from improper conduct. The OIG has recognized in its Guidance that such a standard is not expected from an effective compliance program. Nonetheless, Lilly expects employees to comply with the CCP, and the CCP is reasonably designed to prevent and detect violations of law, regulations, and company policies, and provides for disciplinary and corrective actions when appropriate.

As of the date of this Declaration, the above-referenced systems are in place, and in addition to the continual refinement process that Lilly expects to occur for its CCP, Lilly will assess its program prior to July 1 of each year.

*ELI LILLY AND COMPANY
July 1, 2009*

For a copy of the Declaration of the company's adherence to the Comprehensive Compliance Program described above, call The Lilly Answers Center at 1-800-LillyRx (1-800-545-5979) or download and print the declaration document [here](#).