

Declaration of Compliance

As part of its continuing commitment to integrity and compliance, Schering-Plough has established a Comprehensive Compliance Program that is designed to reasonably prevent and detect violations of law and company policy. To the best of our knowledge, and based on a good faith belief, our policies comply with the California Drug Marketing Practices Statute. As recommended by the U.S. Department of Health and Human Services Office of Inspector General (“OIG”), our Compliance Program is tailored to meet the unique needs of our company. While our code of conduct (“Standards of Global Business Practices”) and other written standards require adherence to law and company policy, the OIG has recognized that even effective compliance programs may not entirely eliminate improper conduct by employees. Thus, we have established procedures to detect violations and ensure that instances of alleged improper conduct are properly reviewed and acted upon. Finally, our Compliance Program is dynamic, and we regularly review and reassess our efforts, and implement enhancements as necessary. As of the date of this statement, the Program described above is in place and will be reassessed on a regular basis.

Effective July 1, 2005