



ADVANCED BIONICS, LLC DECLARATION OF COMPLIANCE

Advanced Bionics, LLC (the "Company") is committed to the highest standards of ethical conduct. As part of our continued effort in the area of compliance, we have developed a Corporate Integrity Program that is reasonably designed to prevent and detect violations.

DECLARATION OF COMPLIANCE

To the best of our knowledge, and based on our good faith understanding of the statutory provisions, we have established a Corporate Integrity Program consistent with the applicable requirements of California Health and Safe Code §§ 119400-119402. We have developed the Corporate Integrity Program tailored to the size, organizational structure and resources of the Company, and implemented to meet the compliance goals set forth by the State of California.

To our knowledge, we are, in all material aspects, in compliance with our Corporate Integrity Program as described, meaning that we have established the elements outlined and where procedures are described, we have set up programs to implement these procedures.

CHANGES TO THE CORPORATE INTEGRITY PROGRAM

We are regularly reassessing our Corporate Integrity Program to improve it and it is possible that we will do so in the coming year and beyond.

Recognizing that compliance is a dynamic concept, we have tailored our Corporate Integrity Program to fit the unique environment and size of our Company.

QUALIFIERS

Government standards on compliance programs, including the compliance program guidance published by the Office of Inspector General, U.S. Department of Health and Human Services (the "HHS-OIG Guidance"), recognize that no program can completely prevent individual employees from engaging in improper conduct. As such our compliance program requires the Company to respond promptly to potential violations of law and Company policy, take appropriate disciplinary action, assess whether the violation is in part due to gaps in our policies, practices or internal controls, and take action to prevent future violations.

DISTINCTION OF DEVICE MANUFACTURERS

The Code of Ethics on Interactions with Healthcare Professionals of the Advanced Medical Technology Association ("AdvaMed Code") recognizes that the medical device industry is significantly different from the pharmaceutical industry. Consistent with the HHS-OIG Guidance, we have tailored our Corporate Integrity Program to the nature of our business. While the California law makes references to compliance with the PhRMA Code on Interactions with Healthcare Professionals ("PhRMA Code"), we, as a medical device manufacturer, have substantially adopted the AdvaMed Code policies and procedures for compliance (which are substantially similar to the PhRMA Code).

TIMEFRAME COVERED

This declaration made as of April 9, 2009, and as noted above, it is possible and likely that we will update our Corporate Integrity Program on an ongoing basis.