

SONOSITE COMPREHENSIVE COMPLIANCE PROGRAM

I. SONOSITE'S DECLARATION OF COMPLIANCE

To the best of our knowledge, SonoSite's Comprehensive Compliance Program outlined below complies with Chapter 8, Part 15 of Division 104 of the Health and Safety Code of the State of California, also known as the Sherman Food, Drug, and Cosmetic Law; and that SonoSite is in compliance with this program.

A copy of this document is available on line at www.sonosite.com and may also be obtained by calling (888) 482-9449 and requesting a copy of the SonoSite Comprehensive Compliance Program document from SonoSite's Legal Department.

II. INTRODUCTION

SonoSite, Inc. is the recognized world leader in Hand-Carried Ultrasound. Our success is due to our reputation for quality and integrity in our dealings with physicians and other healthcare professionals. These values are reflected in the character of the individuals who represent SonoSite in all facets of our business.

To ensure the continuation of our tradition of adherence to high ethical standards, SonoSite has created the SonoSite Comprehensive Compliance Program (SCCP). All SonoSite employees are expected to abide by the standards and related policies outlined in the SCCP.

SCCP is consistent with the published recommendations from the US Department of Health and Human Services Office of the Inspector General (OIG), and standards produced by the Advanced Medical Technology Association (AdvaMed). While the Pharmaceutical Research Manufacturers of America (PhRMA) released their standards before AdvaMed, the PhRMA standards are essentially a subset of AdvaMed's code. In addition, the AdvaMed code was specifically designed for medical device companies and thus provides more appropriate guidance for our industry.

III. SCCP OVERVIEW

SonoSite recognizes that any such program may require occasional updating to improve compliance and thus SonoSite will make changes to the SCCP as determined to be necessary.

The SCCP includes SonoSite's [Code of Conduct](#) and [Guidelines for Interaction with Healthcare Professionals](#). All SonoSite employees, including SonoSite Board of Directors and senior executives, are expected to abide by these standards and related policies.

- **Code of Conduct.** The Code of Conduct (Code) outlines expectations for all employees, including those in our foreign subsidiaries, to adhere to the law, SonoSite policies and the values stated within the Code.
- **Guidelines for Interaction with Healthcare Professionals:** The Guidelines for Interaction with Healthcare Professionals (Guidelines) provides a framework for appropriate interaction between US-based SonoSite personnel and healthcare

professionals (HCP). The Guidelines are consistent with standards established by HHS OIG, AdvaMed and PhRMA.

IV Compliance Officer.

SonoSite's General Counsel has been designed as our Compliance Officer. SonoSite has established a mechanism for employees to anonymously report their concerns of inappropriate activities to the Compliance Officer. In addition, SonoSite has a policy of providing "whistleblowers" protection from retaliation for reporting violations of the law and SonoSite policies.

V. Education and Training.

SonoSite will train applicable SonoSite employees, including Sales, Clinical Application and Marketing personnel, to the standards and expectations contained in the Code and Guidelines. SonoSite will review and update SCCP training materials as determined to be appropriate.

VI. Monitoring SCCP

SonoSite will endeavor to monitor the effectiveness of the SCCP and implement changes as deemed necessary.

VII. Addressing Failure to Comply with SCCP .

SonoSite's expects all employees to adhere to the Code and Guidelines. The Company may take disciplinary actions against an employee for failure to do so.