

PhRMA CODE COMPLIANCE

Cumberland Pharmaceuticals Inc. fully supports the Pharmaceutical Research and Manufacturers of America (PhRMA) revised Code guiding the pharmaceutical industry's interactions with healthcare providers, including new guidelines on promotional items, meals and sponsorship of meetings. It is Cumberland's intent to focus on delivering only information and materials that help healthcare professionals understand which treatments are appropriate for their patients.

To that end, Cumberland has already taken the necessary steps to identify and implement appropriate changes to its marketing program to be in compliance by January 1, 2009. Additionally, Cumberland will implement periodic external verification to ensure that the company's new policies and procedures are fostering compliance with the Code.