



HUMAN GENOME SCIENCES COMPREHENSIVE COMPLIANCE PROGRAM

Human Genome Sciences, Inc. (“HGS” or the “Company”) is committed to advancing science through pioneering research and development to create novel therapies that will help people live healthier, longer, and more satisfying lives. In achieving this goal, HGS is committed to conducting its business activities in compliance with all applicable laws, regulations, and industry codes and acting in a way that reflects the highest standards of ethical behavior. As part of this commitment, HGS has established a Comprehensive Compliance Program that was developed in accordance with the “Compliance Program Guidance for Pharmaceutical Manufacturers” (“OIG Compliance Program Guidance”), established by the United States Department of Health and Human Services, Office of Inspector General and includes policies for compliance with the Pharmaceutical Research and Manufacturers of America “Code on Interactions with Healthcare Professionals” (“PhRMA Code”).

OVERVIEW

Leadership and Structure

HGS’ General Counsel and Executive Vice President serves as the Company’s Ethics and Compliance Officer. The Ethics and Compliance Officer reports directly to the Chief Executive Officer and the Audit Committee of the Board of Directors and is charged with the responsibility for developing, operating, and monitoring the compliance program. The Ethics and Compliance Officer also leads the Committee on Compliance Oversight, which is comprised of executive leadership from various parts of the business and assists the Ethics and Compliance Officer with implementation of the compliance program.

Written Standards of Conduct

HGS has adopted written standards of conduct as well as policies and procedures that verbalize the Company’s commitment to compliance and provide guidance to the Company and its employees and representatives in the conduct of daily operations.

The Code of Ethics and Business Conduct

The Code of Ethics and Business Conduct (“Code”) summarizes the values and principles that guide HGS’ actions in conducting business. The Company requires that all employees, officers and directors comply with this Code and all laws, rules and regulations applicable to the Company wherever it does business. HGS also expects its agents, consultants, contractors, representatives, investigators, and partners to be guided by the Code to the extent applicable to them.

The Compliance Policy Manual

The Compliance Policy Manual (“Manual”) provides specific rules governing how all HGS officers, directors, employees, and agents working on behalf of the Company interact with healthcare professionals and the community when conducting sales, marketing, educational, and other activities within the United States. The policies address specific potential risk areas for pharmaceutical manufacturers identified in the OIG Compliance Program Guidance and discussed in the PhRMA Code. In accordance with California Health & Safety Code §119402(d)(1), HGS has established an annual spend limit of \$2000 per healthcare professional in connection with certain promotional activities. This amount represents a maximum limit and does not represent an average or typical amount. This limit is in place for annual periods commencing on January 1, 2011.

Education and Training

A key element of HGS’ Comprehensive Compliance Program is the education and ongoing training of its employees, officers, directors, and agents regarding their legal and ethical obligations. As an educational resource, HGS provides online access to the Code of Ethics and Business Conduct and the Compliance Policy Manual. All employees, officers, and directors receive training on the Code of Ethics and Business Conduct. Additionally, HGS provides training on the Compliance Policy Manual to those employees whose job responsibilities involve interactions with healthcare professionals.

Internal Lines of Communication

HGS provides multiple channels for employees and others to ask questions, report general issues, and raise compliance concerns. Employees are encouraged to communicate with their supervisors or the Ethics and Compliance Office if an ethical question or concern arises. Every employee is responsible for raising concerns about illegal, unethical or questionable behavior to HGS. Employees who know or reasonably believe that a violation of HGS policies or any kind of unlawful or unethical behavior has occurred are required to promptly report this information to the HGS Ethics and Compliance Office (“ECO”). Reports to the ECO may be made on a confidential or anonymous basis.

Ethics and Compliance Helpline (Call Toll Free): 1-866-HGS-ETHK (1-866-447-3845)
Confidential Ethics and Compliance Email: ECO@hgsi.com

HGS employees also may contact Compliance directly at Compliance@hgsi.com

HGS strictly prohibits retaliation against an employee who, in good faith, reports a suspected compliance violation. Any employee, officer, or director found to have engaged in retaliation of any kind will be subject to disciplinary action.

Monitoring and Auditing

Monitoring and auditing are integral parts of HGS' Comprehensive Compliance Program. Monitoring and auditing provide HGS with an opportunity to detect and prevent potential compliance concerns. The nature and frequency of compliance reviews vary in accordance with factors including, but not limited to, risk factors particular to the company and the regulatory environment.

Enforcement of Written Standards Through Discipline

HGS' Code of Ethics and Business Conduct and the Compliance Policy Manual inform and provide guidance to employees, officers, directors, and others acting on behalf of HGS regarding the Company's commitment to compliance and clearly state that violations of the law, Code or Manual may lead to disciplinary action including, but not limited to, an oral or written warning, re-training, disciplinary probation, suspension, reduced compensation, demotion, or termination.

Investigating and Responding to Potential Violations

HGS' Ethics and Compliance Officer, or a designee, is responsible for prompt and thorough investigation of reported instances of suspected noncompliance either through an informal inquiry or a formal investigation, as appropriate. If a suspected violation is confirmed, HGS will take all reasonable steps, including reporting findings and corrective action to relevant governmental authorities, where appropriate, to respond appropriately to the conduct in question and to prevent similar offenses from occurring in the future. Employees, officers, and directors are expected to cooperate fully with any inquiry or investigation regarding an alleged violation.

HGS DECLARATION OF COMPLIANCE

HGS declares, in good faith, that to the best of its knowledge it is in substantial compliance with its Comprehensive Compliance Program and the requirements of California Health & Safety Code § 119402. HGS is not representing that all employees and contractors will always be in full compliance with its Comprehensive Compliance Program. It is, however, HGS' expectation that all employees and contractors comply

with its Comprehensive Compliance Program. In addition, HGS is committed to assessing ongoing compliance with its Comprehensive Compliance Program, which is designed to prevent, detect and address potential or actual instances of non-compliance.

CONCLUSION

HGS will review and update its Comprehensive Compliance Program, as appropriate. A description of HGS's Comprehensive Compliance Program, including the Company's written declaration of compliance with California Health & Safety Code § 119402, can be requested by calling the Ethics and Compliance Helpline number at 1-866-HGS-ETHK (1-866-447-3845), or by emailing HGS at compliance@hgsi.com.