

June 10, 2011

Brainlab, Inc. (“Brainlab”) Annual Declaration of Compliance with California Law

The medical device industry has established various voluntary codes of ethics, such as the AdvaMed Code of Ethics on Interactions with Health Care Professionals ("AdvaMed Code"). Brainlab AG, the parent company to Brainlab, has adopted a code of conduct to address interactions involving health care professionals with respect to its medical device products and services (“Code of Conduct”). The Code of Conduct is modeled on the AdvaMed Code and is applicable to and adopted by Brainlab, as a subsidiary of Brainlab AG.

The Code of Conduct is a dynamic document, which is subject to change on accordance with applicable law and as its business evolves. Brainlab embraces change and will make necessary changes to its Code of Conduct on an ongoing basis.

Brainlab believes the Code of Conduct meets the compliance goals set forth in the State of California's Health & Safety Code §§119400 – 119402. To its knowledge, Brainlab is, in all material respects, in compliance with the Code of Conduct and applicable law.

This declaration is made only for the purpose of compliance with California Health and Safety Code section referenced above and should not be interpreted as a declaration of compliance with any other statute or regulation.

Signed,

Paul Neil
Compliance Officer
Brainlab, Inc.

Brainlab will provide its Code of Conduct and declaration as it relates to the California Health & Safety Code §§119400-119402 via fax or hardcopy upon request. To request this information please contact us at 1.800.784.7700, if you are in the U.S. or Canada; or 1.708.409.1343, if you are calling from any other location, worldwide.