

California Comprehensive Compliance Program Statement

PSS World Medical, Inc. is committed to conducting our business in a legal and ethical manner and complying with State and Federal compliance program guidelines and industry standards relating to the marketing and promotion of our products. Our program was established in accordance with the Compliance Program Guidance for Pharmaceutical Manufacturers issued by the Office of Inspector General of the United States Department of Health and Human Services (OIG HHS). Additionally, our program follows the most recent version of the "Code of Interactions with Healthcare Professionals" issued by the Pharmaceutical Research and Manufacturers of America (PhRMA).

I. Our Comprehensive Compliance Program Consists of the Following Elements:

1. Written Policies and Procedures

PSS World Medical, Inc.'s policies and procedures are written and revised as needed. These practices help to guide PSS World Medical, Inc. and the conduct of our employees in our day-to-day operations.

Policy on Charitable Contributions

PSS World Medical, Inc. will consider requests for charitable contributions for 501(c)(3) organizations that improve the health and welfare of children or improves the healthcare industry.

Policy on the Provision of Educational and Practice Related Items

PSS World Medical, Inc. representatives may offer items, infrequently, to healthcare professionals that contribute to the education of patients and where the value is less than or equal to \$100. Also, the item must not have an educational value to the healthcare professional outside his or her professional responsibilities which coincides with the PhRMA Code.

Total Annual Dollar Limit for Meals, Educational or Practice-related Items

PSS World Medical, Inc. has established an annual limit of \$500 for meals and educational items as the aggregate value of the items or activities to be provided to California Healthcare Professionals pursuant to the requirements of California Health & Safety Code §119402 (S.B.1765).

Policy Prohibiting Entertainment

PSS World Medical, Inc.'s policy is to not provide any form of Entertainment to Healthcare professionals (e.g. sporting events, concerts, etc) in the state of California.

2. Assigned Compliance Officer

PSS World Medical, Inc. has a Corporate Compliance Officer who has the authority to report significant issues directly to the Board of Directors. Additionally, our Compliance Officer is responsible for developing, implementing, operating and monitoring the compliance program. Our Corporate Compliance department investigates all instances of non-compliance with our established marketing code of conduct.

3. Training and Education

PSS World Medical, Inc. provides ongoing education and training for all employees annually regarding our Code of Conduct. Sales and Marketing employees receive additional training to ensure that they understand our marketing policies and the laws governing sales activities.

PSS World Medical, Inc.'s Commitment to Ethics outlines the Company's expectations of proper conduct by all employees including officers, directors, employees, agents, customers, subcontractors, suppliers, and prime contractors.

4. Communication

PSS World Medical, Inc. has developed a communication plan which includes a toll free helpline, 1-866-404-7774 that is accessible 24-hours a day, seven days a week to field concerns made by employees or others. Calls can be made anonymously and without fear of retribution.

5. Auditing and Monitoring

PSS World Medical, Inc. self assesses and periodically audits compliance with our policies and procedures.

6. Enforcement and Disciplinary Guidelines

Our Code of Conduct (The PSS World Medical Way, Our Commitment to Ethics) and Employee Handbook educate our team members about our company's commitment to Compliance. These documents put all team members, including management, on notice that failure to adhere to our compliance standards may have disciplinary consequences, up to and including termination of employment. If an investigation suggests that discipline may be warranted, appropriate action is taken.

7. Responses to Detected Problems and Actions to Correct Issues

PSS World Medical, Inc. will respond to all potential violations of the Company's Compliance program, including but is not limited to Sales and Marketing practices. Once a violation has occurred PSS World Medical, Inc. will review and revise if necessary all policies and procedures, training, communications and monitoring systems related to the matter in an effort to prevent any future violations.

NOTICE: This information being provided pursuant to the requirements of the California Health & Safety Code §119402 (S.B. 1765), which requires pharmaceutical and medical device companies doing business in California to make available their program for compliance with applicable federal and state laws and industry standards regulating the marketing and promotion of their products

DECLARATION FOR CALIFORNIA COMPLIANCE LAW

As required by California Health & Safety Code 119400-119402, PSS World Medical, Inc. has established a Comprehensive Compliance Program (CCP) organized around our Code of Ethics and has established an annual dollar limit on educational or practice-related items and meals which PSS World Medical, Inc. employees are permitted to provide to healthcare professionals in California. To obtain a written copy of our Comprehensive Compliance Program please call 1-866-535-2917 and leave a detailed message to include your Company name, company address, and a phone number you can be reached at.