

# 2011

## Whistleblower Policy



***Targeted Medical Pharma Inc.***

Approved by the Board of Directors

February, 2011

**CORPORATE COMPLIANCE HOTLINE POLICY  
TARGETED MEDICAL PHARMA, INC.**

**I. POLICY**

This Policy for Handling Complaints Regarding Accounting and Auditing Matters and Code of Conduct Matters (the "Policy") has been adopted by the Audit Committee of Targeted Medical Pharma, Inc. (the "Company") to establish procedures for (i) the receipt, retention, and treatment of complaints received by the Company regarding accounting, internal accounting controls, or auditing matters ("Accounting Matters"); (ii) the confidential, anonymous submission by employees of the Company of concerns regarding questionable accounting or auditing matters; and (iii) the receipt, retention, and treatment of complaints received by the Company regarding violations of the Company's Code of Conduct.

The Company is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices, and its' Code of Conduct. Employees are reminded that it is their duty to report evidence of misconduct and to raise concerns through any of the channels available to them, including supervisors, the legal department, or the procedures set forth under this Policy. The Audit Committee will oversee treatment of employee concerns in this area.

This Policy applies to the Company, its' division Physician Therapeutics Laboratories (PTL) and its subsidiaries Complete Claims Processing, Inc. (CCPI) and Laboratory Industry Services (LIS). The Company, PTL, CCPI and LIS are collectively referred to as the Company.

To further the Company's goal of detecting all potential illegal and unethical activities and educating employees and agents regarding appropriate conduct, the Company has established the following toll-free telephone number and email addresses as the Company's Corporate Compliance Hotlines,

888-867-5811  
hotline@tmedpharma.com  
hotline@ptlcentral.com,

whereby employees and third parties may submit any complaint or concern regarding questionable Accounting Matters or Code of Conduct matters. Complaints or concerns submitted through the toll-free number regarding accounting and auditing matters are forwarded to the Audit Committee with a copy sent to the General Counsel of the Company for record keeping. Concerns regarding the Company's Code of Conduct are transcribed and forwarded to the Company's Compliance Committee.

Employees of the Company have the option to disclose his/her identity or remain anonymous. All non-employee submitters must identify themselves.

An employee of the Company, or third party, may also submit a concern or complaint regarding any Accounting Matter or Code of Conduct matter by mail addressed to the Chair of the Audit Committee as follows:

**PRIVILEGED AND CONFIDENTIAL**  
Chair, Audit Committee  
Targeted Medical Pharma, Inc.  
2980 Beverly Glen Circle, Suite 301  
Los Angeles, CA 90077

Anyone may call the Corporate Compliance Hotline at any time to ask questions as well as report any suspected illegal or unethical behavior or other violations of our Code of Ethics or Employee Policies. Callers are not required to provide their names and Targeted Medical Pharma will not make any effort to trace hotline calls or otherwise identify a caller who requests to remain anonymous. It is the General Counsel's responsibility, together with the Audit Committee of the Board of Directors, to fully investigate each call and ensure that appropriate follow up actions are taken.

Targeted Medical Pharma will not engage in or tolerate retaliation against employees who report suspected violations of the law or Targeted Medical Pharma policies or other unethical activities. All reports will be treated seriously.