

1.0 PURPOSE:

- 1.1. Medartis Sponsored Business Meetings (MSBM) are meetings that are initiated and arranged by Medartis employees or Medartis Agents for the purpose of promoting Medartis products and services with Health Care Professionals (HCP). These business meetings are referred to as "Medartis Sponsored" because Medartis is responsible for all aspects of the meeting.
- 1.2. This policy defines the appropriate conduct and standards that must be adhered to in order to comply with the AdvaMed Code of Ethics as well as the laws and regulations that govern our interactions with HCPs.

2.0 SCOPE:

- 2.1. This policy applies to all Medartis Inc employees.

3.0 REFERENCE DOCUMENTS:

- 3.1. N/A

4.0 DEFINITIONS:

- 4.1. Health Care Professional (HCP) is any person or entity (a) authorized or licensed in the United States to provide health care services or items to patients or (b) who is involved in the decision to purchase, prescribe, order, or recommend a Medical Technology in the United States. This term includes individual clinicians (for example, physicians, nurses and pharmacists, among others), provider entities (for example, hospitals and ambulatory surgical centers), and administrative personnel at provider entities (for example, hospital purchasing agents). This term does not include Health Care Professional who are bona fide employees of Medartis
- 4.2. HCP Consultant is an HCP who provides consulting services to Medartis under a written consulting agreement.
- 4.3. High Cost Cities are Boston, Chicago, Las Vegas, Los Angeles, Miami, New York, San Francisco and Washington DC.
- 4.4. Medartis Agent are individuals or entities who are authorized to sell Medartis product under a current written agreement.
- 4.5. Medartis Sponsored Business Meetings (MSBM) are meetings that are initiated and arranged by Medartis employees or Medartis Agents for the purpose of promoting Medartis products and services with HCPs. MSBMs are more commonly referred to as "meetings with customer", "in-service lunch or breakfast" and "plant tours".

5.0 RESPONSIBILITY/AUTHORITY:

- 5.1. All Medartis employees and agents are responsible for following this policy when planning or attending a MSBM with HCPs who practice in the United States.

6.0 PROCEDURE:

- 6.1. Purpose of the Meeting

- 6.1.1. The MSBM must have a legitimate business purpose relating to Medartis products and services. For example, to discuss product features, sales terms, service offerings, health economics information, or purchase arrangements.
- 6.1.2. The purpose of the MSBM is never to reward an HCP for past usage or as an unlawful inducement for future purchases.
- 6.1.3. The purpose of the MSBM must be documented as described in the Recordkeeping section of this policy.
- 6.2. On-Label Promotion
 - 6.2.1. The information that Medartis employees and Medartis Agents provide an HCP:
 - 6.2.1.1. Must be consistent with the on-label uses of a medical device, which are defined in the product's FDA "approved labeling" or Instructions for Use (IFU).
 - 6.2.1.2. Must be truthful and not misleading.
 - 6.2.1.3. Must appropriately balance the benefits and risks associated with the medical device.
 - 6.2.1.4. Cannot include information on the off-label uses of a medical device. This includes situations where the off-label use is the standard of care as well.
 - 6.2.1.5. Cannot promote medical devices that have not been approved by the FDA.
- 6.3. Speaker
 - 6.3.1. The only individuals that are authorized to speak on Medartis' behalf at an MSBM are Medartis employees and Medartis Agents
- 6.4. Who can attend?
 - 6.4.1. Each HCP in attendance must have a objective, legitimate need to attend a MSBM. Guests of an HCP or office staff who do not have a bona fide professional interest in the information being shared may not attend the MSBM or receive meals or refreshments provided at the MSBM.
- 6.5. Who must attend?
 - 6.5.1. A Medartis employee or Medartis Agent must be present for the entire MSBM. Leaving food or refreshments behind at a medical practice (i.e. "dine and dash") is prohibited.
- 6.6. HCP Ground Transportation
 - 6.6.1. Medartis employees and Medartis Agents may provide an HCP with ground transportation (e.g. taxi, Uber, Lyfe) to and from a MSBM and the HCP's home or place of business.

6.7. HCP Travel and Lodging

6.7.1. Typically, MSBMs are local events and do not necessitate the need for an HCP to travel out of town. However, Medartis may pay for certain HCP travel and lodging expenses to attend a plant tour at our facility in Warsaw, Indiana or Basel, Switzerland. To ensure the following restrictions are adhered to, a Medartis employee should make flight and lodging arrangement on behalf of the HCP attending the plant tour.

6.7.1.1. Plant tours – Warsaw, Indiana

6.7.1.1.1. Travel - Medartis may pay for economy or economy plus airfare and ground transportation for an HCP to attend a plant tour at its facility in Warsaw, Indiana.

6.7.1.1.2. Lodging – Medartis may pay for one night of lodging for the evening before the plant tour. Medartis may pay for a second night of lodging the evening the plant tour ends if there are no flights that arrive before 9pm at the HCP's home airport. Lodging must be for a standard room and the room rate must not exceed \$300 per evening excluding taxes.

6.7.1.2. Plant Tours – Basel Switzerland

6.7.1.2.1. Travel – Medartis may pay for business class airfare and ground transportation for an HCP to attend a plant tour at its facility in Basel, Switzerland.

6.7.1.2.2. Lodging – Medartis may pay for two nights of lodging in Basel. The night before the plant tour, as well as the night of the plant tour. Lodging must be for a standard room and the room rate must not exceed 275 Swiss Francs per evening excluding taxes.

6.8. Setting and Location

6.8.1. A MSBM should be held in a setting that is conducive to bona fide scientific, educational, or business discussions. This may include, for example, the Health Care Professional's place of business or an Medartis Sponsored Business Meeting Policy Effective: 04/1/23 Version: 1.1 off-site space that is conducive to business discussions, such as a restaurant. Holding a MSBM in a resort, sporting or entertainment venue is prohibited.

6.9. Meals and Refreshments

6.9.1. Meals and refreshments may be provided to HCPs at a MSBM as a business courtesy.

- 6.9.2. Meals and refreshments should be subordinate in time and in focus to the discussion and presentation of scientific, educational, or business information.
- 6.9.3. Meals and refreshments may be provided occasionally.
- 6.9.4. Providing or paying for meals or refreshments at meetings or events that are not initiated and arranged by a Medartis employee or Agent are prohibited. For example, paying for meals at a medical practice's office party or a fellowship alumni meeting are prohibited.
- 6.9.5. Employees and Medartis Agents are prohibited from providing meals and refreshments to HCPs who actively practice in the state of Vermont regardless of where the MSBM takes place.
- 6.9.6. The average per person meal cost for all attendees must not exceed the limits listed in the table below. These meal limits include tax and tip as well as room fees and any other surcharges.

Meal	United State	High Cost Cities*
Breakfast	\$45	\$50
Lunch	\$65	\$75
Dinner	\$150	\$175
*Boston, Chicago, Las Vegas, Los Angeles, Miami, New York, San Francisco and Washington DC.		

- 6.10. Alcoholic Refreshments
 - 6.10.1. Alcoholic consumption is discouraged and must not exceed two drinks per person.
- 6.11. Payment
 - 6.11.1. Medartis employees or Medartis Agents must pay the restaurant or caterer directly for the meal. Payments may not be made to an HCP, medical practice or hospital
 - 6.11.2. A Medartis employee who has a supervisory responsibility for reviewing and approving expense reports may not ask a subordinate to pay for a meal that the supervisor attends. The supervisor should pay for the meal in these situations.
- 6.12. Recordkeeping
 - 6.12.1. Medartis is required to report to the federal government as well as certain states detailed information on the meals and ground transportation that its employees and Agents provide to HCPs.

6.12.2. Medartis employees must record the purpose of the meeting and the names of the Medartis products that were discussed in their expense reports.

6.12.3. Medartis employees must record the names of all MSBM attendees, their NPI number, professional designation (e.g. MD, DO, PA, RN, Scrub Tech), and state of licensure of all HCPs attending in their expense report.

6.12.4. Medartis employees must include the full value of all meal expenses in their expense reports including those expenses that may have exceeded the limits of this policy.

6.12.5. Medartis employees must include the original itemized receipt in their expense report

6.12.6. Medartis Agents must maintain a process to document and collect this information as well and report it to Medartis when requested.

6.13. Compliance

6.13.1. If you have any questions regarding the conduct and standards that are defined in this policy, please contact the US Director of Compliance.

7.0 RECORDS:

7.1. N/A

8.0 REVISION HISTORY:

Version	Effective Date	Summary of Change	CO #	Author
00	6/29/2023	Initial US Release	23-205	P. Lauk/ C. Sexton

9.0 APPENDIX:

9.1. N/A

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