

[Insert Company Name and/or Logo]

Quick Reference Guide

Title:	Summary of Compliance Requirements
Purpose:	An overview of the requirements of our compliance programme (review applicable policies for more information)
Effective Date:	[Enter date]

General guidelines	
1.	We only have interactions with a healthcare professional or government official for a proper business reason.
2.	We limit our interactions to those allowed by local laws, industry codes and our policies (for example, entertainment is always prohibited).
3.	We never offer anything of value—a meal, a trip to a training meeting, a round of golf, cash—to encourage new or recognize past sales volume.
4.	The following are some examples of bribery. All of these activities are prohibited : <ul style="list-style-type: none"> ○ Pay cash to reward or thank a healthcare professional or government official for placing an order or using our products (pay per procedure). ○ Sponsor a healthcare professional or government official to a product training meeting or medical conference as a reward for current or future product orders. ○ Pay expenses for the spouse of a healthcare professional or government official who is attending a product training meeting or a medical conference. ○ Support illegal payments with fake consulting contracts or other false transactions. ○ Hire the friend or relative of a healthcare professional or government official to encourage or reward the purchase of products. ○ Provide any other form of personal benefit to a healthcare professional or government official to encourage or reward the purchase of products.

Hospitality (meals)	
Allowed	Prohibited
<ul style="list-style-type: none"> • We only offer hospitality (meals) for a proper business purpose, such as product training. 	<ul style="list-style-type: none"> • We do not have a meal unless it supports a necessary business interaction.
<ul style="list-style-type: none"> • We only invite participants who have a necessary business reason to be there. 	<ul style="list-style-type: none"> • We do not invite or pay for an HCP’s guest.
<ul style="list-style-type: none"> • Ensure meals are modest and do not exceed these per person limits (meal, drinks, tax, tip): <ul style="list-style-type: none"> ○ Breakfast: [enter local limit] ○ Lunch: [enter local limit] ○ Dinner: [enter local limit] 	<ul style="list-style-type: none"> • A guest should not accept an invitation because he is excited by the menu or the restaurant, for example.
<ul style="list-style-type: none"> • We only hold meals in an appropriate location. 	<ul style="list-style-type: none"> • We do not offer recreation or entertainment.

Educational Items	
Allowed	Prohibited
<ul style="list-style-type: none"> • We only provide items that are related to the medical profession, benefit patients or 	<ul style="list-style-type: none"> • We do not give an item someone can benefit from personally, such as an iPad, even if

serve a genuine educational function.	there is educational content on the device.
<ul style="list-style-type: none"> We do not provide items that cost more than [amount in local currency]. This includes any applicable taxes. 	<ul style="list-style-type: none"> We do not give expensive gifts. We do not give any item—regardless of cost—frequently.

Travel, accommodations, etc. as part of an educational meeting or event	
Allowed	Prohibited
<ul style="list-style-type: none"> We only select HCPs who have an interest in the educational content of the event. 	<ul style="list-style-type: none"> We do not select an HCP because he wants to visit the city where the event is held.
<ul style="list-style-type: none"> We may provide modest, reasonable and necessary registration fees, travel, accommodations and meals so an HCP can attend the event. 	<ul style="list-style-type: none"> We do not pay a fee to an HCP for the time spent attending an event
<ul style="list-style-type: none"> We follow the local law or industry code guidelines for class of travel. We only book a modest hotel for the dates required to attend the event. 	<ul style="list-style-type: none"> We do not facilitate a vacation for the HCP and/or his personal guests.
<ul style="list-style-type: none"> We contact the HCP’s employer prior to providing the sponsorship. For [insert TPS’s country name], employer [select one - notification/approval] is required. 	<ul style="list-style-type: none"> We do not use a sponsorship to try to encourage an HCP to use products or to thank him for previous purchases.

Grants or donations	
Allowed	Prohibited
<ul style="list-style-type: none"> We may provide grants or donations to a non-profit and/or charitable organization, medical institution, accredited educational program vendor, medical foundation or professional society that is entitled to receive grants or donations under local laws. We may give grants for the following purposes: <ul style="list-style-type: none"> Reduce conference costs Fund reasonable honoraria, travel, lodging and meals for HCPs that are conference faculty Provide modest meals and receptions for conference attendees Support fellowships programs for HCPs if our company has no influence on the selection of the fellow Provide support to fund the purchase of medical textbooks, subscriptions to medical publications, anatomical models or similar We expect written requests for funding and we document any funding agreements in writing. 	<ul style="list-style-type: none"> We do not provide grants or donations under any of the following circumstances: <ul style="list-style-type: none"> To an individual HCP To offer a price concession To recognize past, present or future use of medical device products or services To fund parties, entertainment or similar events (e.g. sporting or cultural events, city tours, musical performances)

Advertising, booth or exhibit fees	
Allowed	Prohibited
<ul style="list-style-type: none"> We pay fees that are reasonable and 	<ul style="list-style-type: none"> We will never pay advertising or exhibit /

proportionate to the size of the booth, the number of attendees, the exhibit floor hours and the costs for a booth at an equivalent event.	booth fees in exchange for past or potential purchases of our products or services
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Promotional materials	
Allowed	Prohibited
<ul style="list-style-type: none"> We only use promotional materials provided by our medical device business partners for use in our market. 	<ul style="list-style-type: none"> We never promote “off-label” uses of the medical devices we carry.

Conflicts of interest	
Allowed	Prohibited
<ul style="list-style-type: none"> We avoid actual and potential conflicts of interest. 	<ul style="list-style-type: none"> We do not hire any immediate family member of an HCP or Government Official to encourage the HCP or Government Official to use or buy products or services or to obtain or retain business.