



www.AdvaMed.org/India-Compliance

ETHICS & COMPLIANCE HOTLINES

Each of our companies has Ethics & Compliance teams dedicated to communicating and enforcing these standards for our employees and distributors. If there are gaps, concerns or observations, we welcome information via our compliance hotlines.

Compliance contact information for the companies below is available at: www.advamed.org/India-Compliance



JOINT COMMITMENT TO ETHICAL INTERACTIONS

Medical Technology Manufacturers
Committed to Ethical Interactions with
Health Care Professionals



We understand the pressing need to ensure access to high-quality, life-saving medical technology for patients in India, in the most affordable and efficient manner possible. To advance toward this goal, we share a commitment to and fundamental belief in operating with the highest standards of ethics and integrity. We have clear standards of conduct that we expect all of our employees, distributors, agents and anyone else acting on our behalf in India to abide by. We wish to clearly and publicly restate those standards for the benefit of all of our business partners and stakeholders, and most importantly, for patients in India who are our foremost concern.

We have clear standards of conduct that we expect all of our employees, distributors, agents and anyone else acting on our behalf in India to abide by.



Our standards include, but go beyond, complying with the laws and regulations that govern in India. They compel us to conduct our business in India in accordance with the values of honesty and integrity. They require us to strive to prevent, detect and quickly resolve any potential violations of law or company policies.

Our standards clearly prohibit us, our distributors and agents, and anyone else acting on our behalf from attempting to influence a healthcare professional, patient or customer through any improper payment or other type of inducement for using or prescribing our products. Observations or concerns about any such improper payments may be reported confidentially or anonymously to the company involved so they can be investigated and, if true, immediately stopped using the contacts provided in this brochure.

Our standards clearly prohibit attempting to influence a healthcare professional, patient or customer through any improper payment or other type of inducement.

Our Standards of Conduct

1. Distributors and Other Third-Party Sales and Marketing Intermediaries Who Conduct Business on Our Behalf:

Our companies use distributors and agents to help us reach the many hospitals and healthcare providers spread across India's vast territory and population. Our distributors and agents are required to comply with applicable laws, regulations and industry codes. If an activity is prohibited for us, it is prohibited to be done through our distributors and agents as well.

2. Support for Physician Training and Education:

As in all countries, physicians in India need ongoing training and education on medical technology advances. This training builds physician capacity and skills, which will result in patients getting more access to life-saving medical device therapies. Our standards allow providing medical training and educational grants within specific guidelines.

In no circumstances may we, or distributors acting on our behalf, support travel for a physician's spouse or partner, or finance vacations for physicians before, during or after medical conferences.

3. Physician Speaking and Consulting Contracts:

Frequently, peer education is an important way for a physician to learn the safe and effective use of new medical technology. Accordingly, our companies regularly ask experienced senior physicians (particularly those who are specialists in a particular area of therapy) to provide training on advanced technologies for younger or less-experienced physicians, as well as general physicians. We normally pay the experienced physicians fees for their time spent giving such training. Our standards require us, and distributors acting on our behalf, to set forth any such arrangements in written contracts, to ensure that the amount of payment

reflects fair market value for the time spent, and to document the training event, as well as to have a proof of service provided by the physician.

4. Gifts:

Our standards in general prohibit gifts to physicians and other healthcare providers, by us or distributors acting on our behalf.

5. Meals and Entertainment:

Our standards prohibit us, and distributors acting on our behalf, from paying for entertainment for physicians, for example cultural or sporting events. In connection with an appropriate business meeting or educational event, we may pay for reasonable business meals and related expenses, but not for spouses or guests of physicians who do not have a professional role in the meeting or event.