

AdvaMed Device & Diagnostic Compliance Group

2024 Social Media Use and Compliance Survey

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Collated: October 9, 2024
Questions: 20
Submissions: 33
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BACKGROUND

AdvaMed surveyed its members regarding social media use and compliance policies. Thirty-three companies completed the survey in August - September 2024. This document summarizes the survey responses, including additional commentary submitted by some (but not all) companies. The responses reflect a broad cross-section of company policies and are not intended to reflect all medical technology companies.

Definitions:

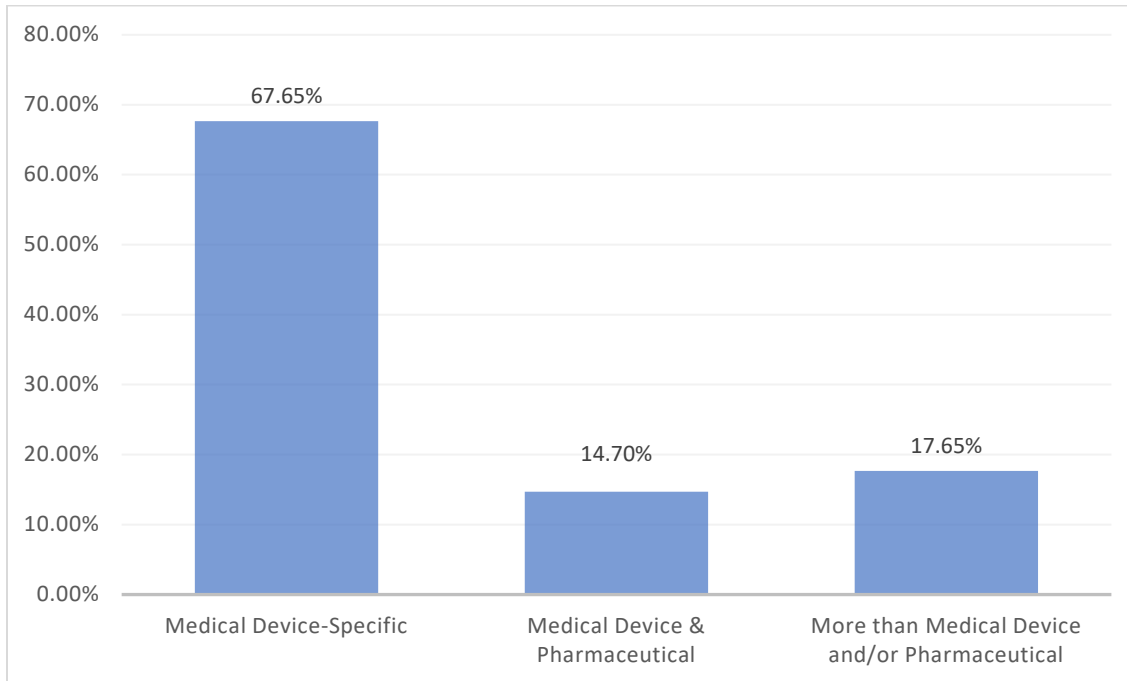
Health Care Professionals (HCPs): For the purposes of this survey, a Health Care Professional is any person or entity (a) authorized or licensed in the United States to provide health care services or items to patients or (b) who is involved in the decision to purchase, prescribe, order, or recommend 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 Professionals who are bona fide employees of a Company while acting in that capacity.

Social Media Influencer: For the purposes of this survey, a Social Media Influencer is a user on social media who has established credibility in a specific industry. These content creators have access to a large audience (e.g., a large number of followers) and can share information to promote products and/or events.

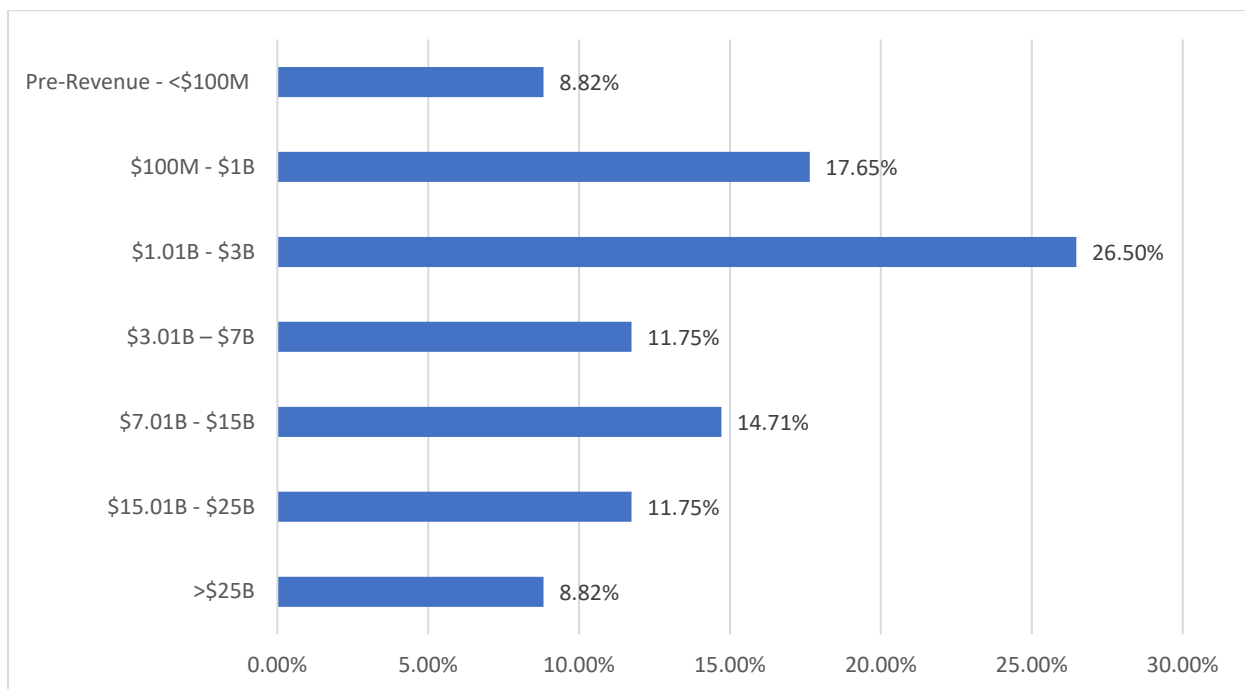
Note: AdvaMed periodically gathers and shares information from Member companies in order to assist companies in understanding industry trends and practices when the information is not competitively sensitive. AdvaMed does not intend to develop a policy on social media use and compliance based on responses to this survey. In all cases, it is understood by AdvaMed and its Members that any company policy or practice that is adopted as a result of this sharing of information is done voluntarily and is a decision by the individual member. The information contained in this report is intended to provide benchmarking data on companies' existing policies only. It is not intended to endorse or mandate any one particular approach for medical technology companies' policies on social media use and compliance.

Demographics

1. Which below best describes your company?



2. What was your Company's 2023 worldwide device-related gross revenue?



Social Media Use

3. Does your company hire HCPs as “Social Media Influencers,” to post marketing content for company products on social media?

2023 Gross Revenue	No	Yes	Total	
Pre-Revenue - <\$100M	100%	0%	9.09%	3
\$100M - \$1B	100%	0%	18.18%	6
\$1.01B - \$3B	100%	0%	24.25%	8
\$3.01B - \$7B	50%	50%	12.12%	4
\$7.01B - \$15B	40%	60%	15.15%	5
\$15B - \$25B	75 %	25%	12.12%	4
>\$25B	33.33%	66.67%	9.09%	3
Total	75.80%	24.20%	100%	33

Comments:

- On a limited basis and for OTC and non-reimbursed products only.
- Testimonials and customer stories
- We do have some HCPS who independently post information about our products, services, or other related content.

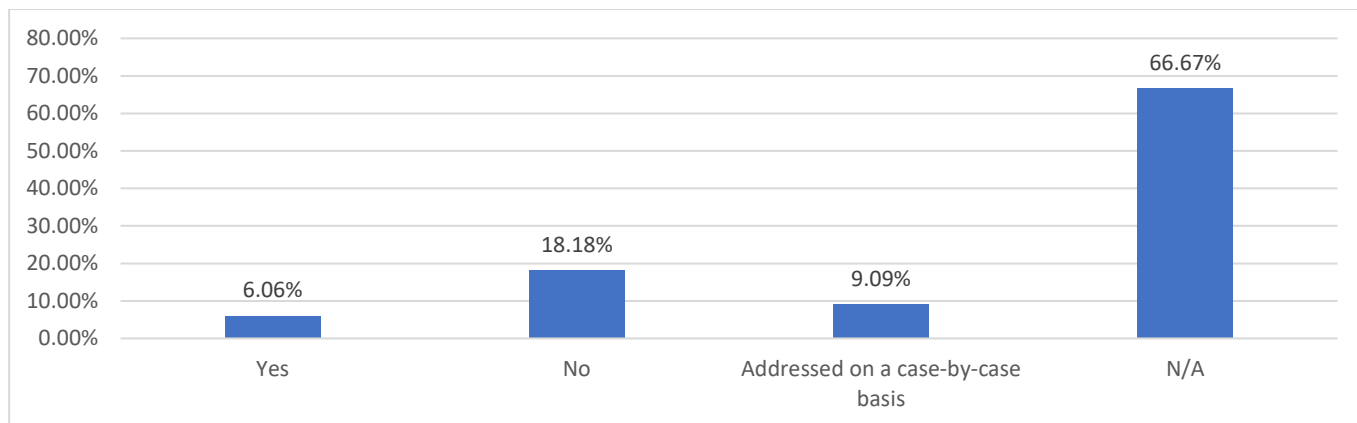
4. Does your company hire HCPs as “Social Media Influencers” to promote company educational programs or other company events on social media?

2023 Gross Revenue	No	Yes	Total	
Pre-Revenue - <\$100M	100%	0%	9.09%	3
\$100M - \$1B	100%	0%	18.18%	6
\$1.01B - \$3B	100%	0%	24.25%	8
\$3.01B - \$7B	75%	25%	12.12%	4
\$7.01B - \$15B	80%	20%	15.15%	5
\$15B - \$25B	100 %	0%	12.12%	4
>\$25B	33.33%	66.67%	9.09%	3
Total	87.88%	12.12%	100%	33

Comments:

- We do have some HCPS who independently post information about our educational programs.

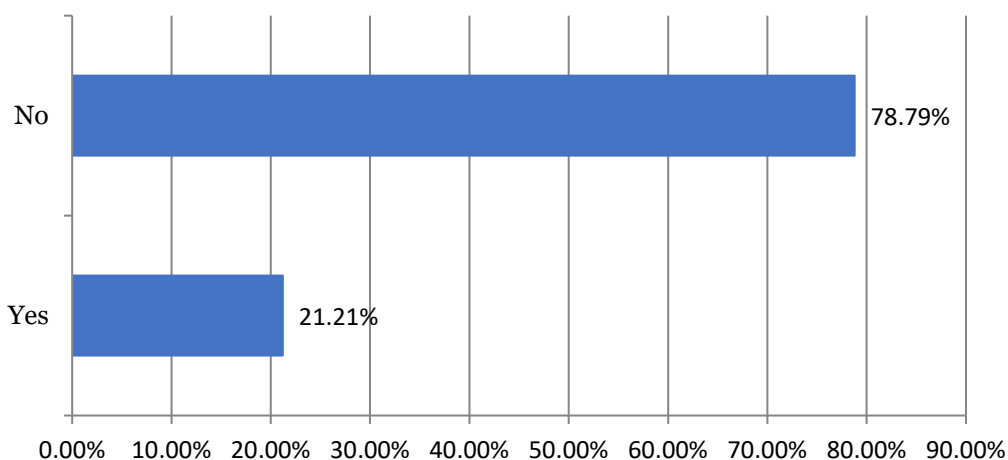
5. Does your company have a policy regarding hiring HCPs as “Social Media Influencers” to promote company products, educational programs, and or other company events on social media?



Comments:

- We do not have a specific policy to address this matter. They are engaged for a service and all information must be pre-approved via the company review and approval process.
- There is no policy specific to Social Media influencers, however, all engagements should be in compliance with the Interactions with Customers/HCPs policy.
- In the process of finalizing the policy.

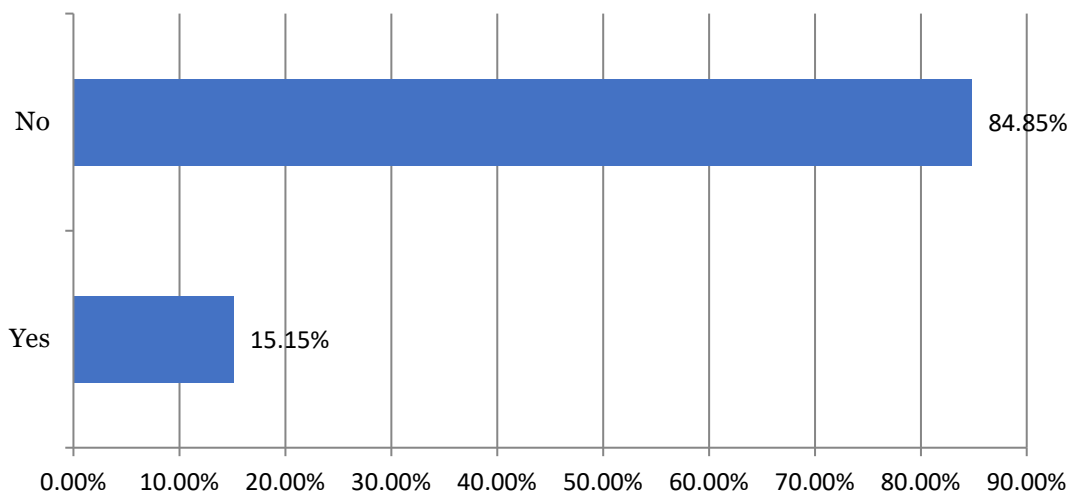
6. Does your company hire non-HCP “Social Media Influencers” to post marketing content for company products on social media? (e.g., patients or patient groups)



Comments:

- We do have some patients, caregivers, and other non-HCPs who independently post information about their experiences with our products.
- Treated similarly to other advertising with all content pre-approved.

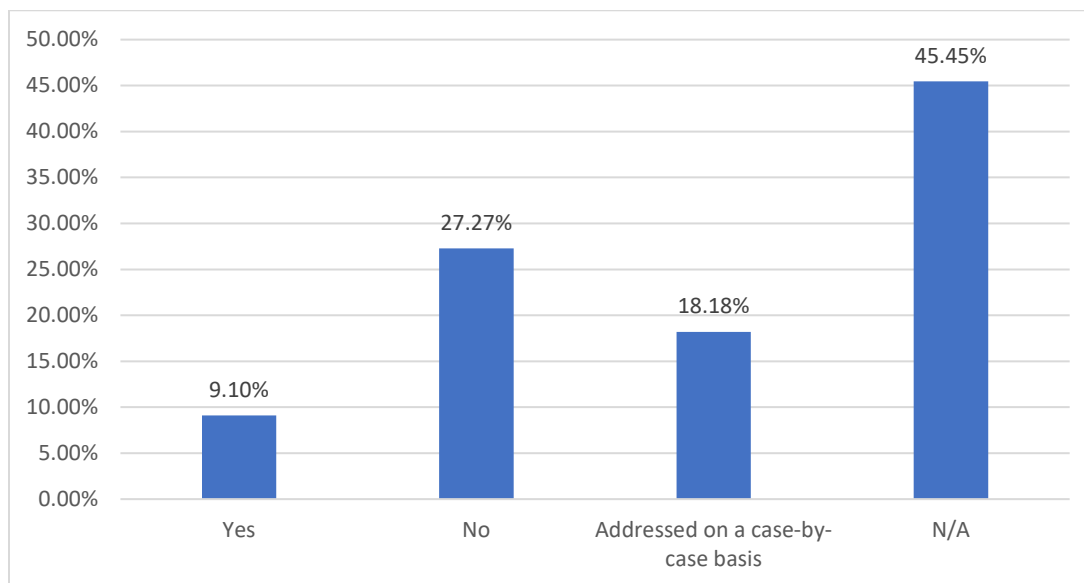
7. Does your company hire non-HCPs as “Social Media Influencers” to promote company educational programs or other company events on social media? (e.g., patients, patient groups)



Comments:

- We do have some patients, caregivers, and other non-HCPs who independently post information about their experiences with our educational programs or events.
- Endorsement contracts with Non-HCPs should be reviewed by Corporate Marketing, in addition to Legal and Compliance.
- Partnered with influencers for specific events but not through social media.

8. Does your company have a policy regarding hiring non-HCPs as “Social Media Influencers” to promote company products, educational programs, and or other company events on social media? [If your company does not hire non-HCPs to promote company products, educational programs, and or other company events on social media please select N/A]



Comments:

- We do not have a policy but have been asked a handful of times to consider these types of arrangements but have historically said “no”.
- It is not an internal policy, but an external Social Media Influencer Toolkit.
- In the process of finalizing a policy.

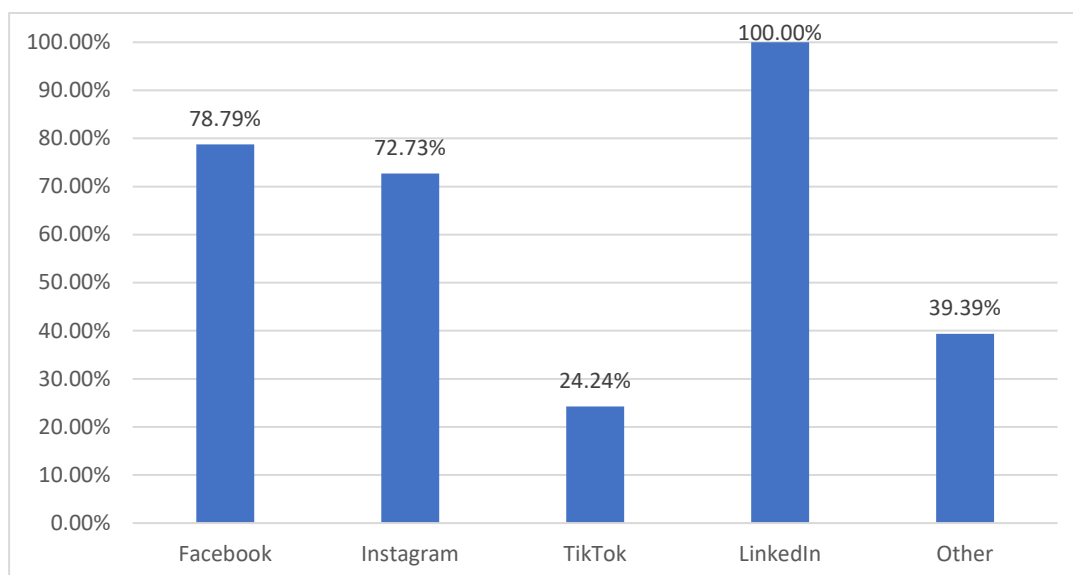
9. Does your company utilize patient testimonials?

2023 Gross Revenue	No	Yes	Total	
Pre-Revenue - <\$100M	0%	100%	9.09%	3
\$100M - \$1B	20%	80%	18.18%	6
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Total	12.12%	87.88%	100%	33

Comments:

- We do obtain patient testimonials about our products for use in marketing and educational programs.
- Has been done occasionally.

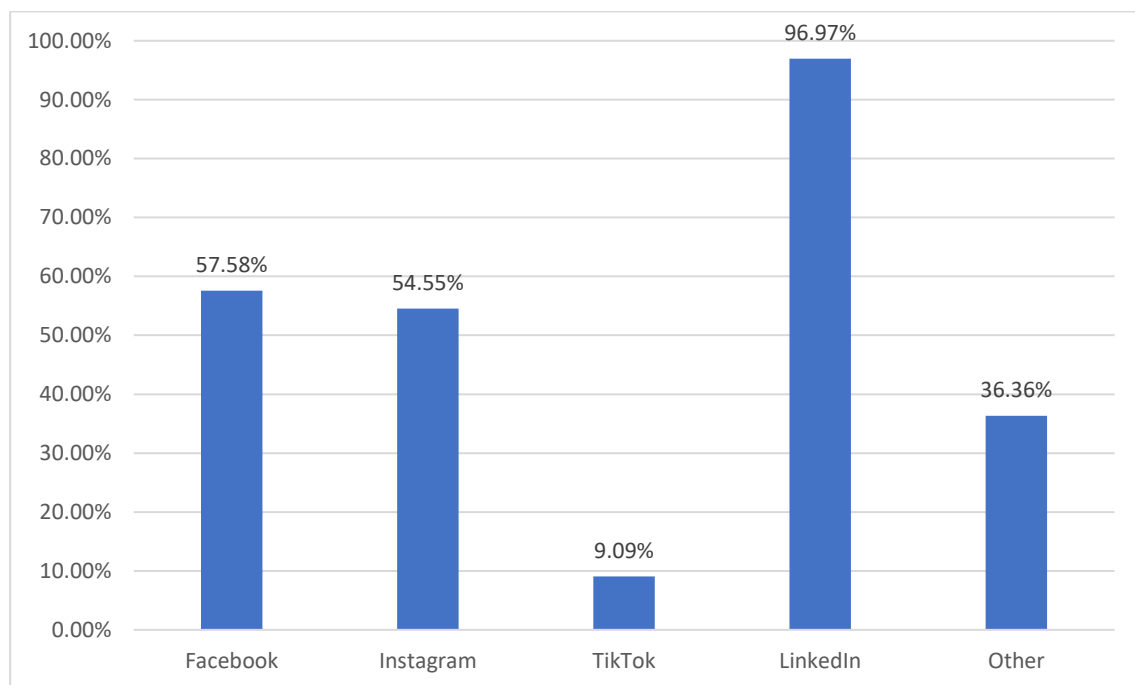
10. Which social media platforms is your company utilizing for marketing products? [Please Select All that Apply]



Comments:

- 8 Responses reference X/Twitter.
- 6 Responses reference YouTube.
- Additional Details:
 - YouTube; and very small-scale programs on X/Twitter today that received exceptions. In general, LinkedIn is our most used platform today for HCP audiences and Meta (IG & FB) are our most used platforms for patients.
 - Also use Twitter/X, WeChat, and YouTube.
 - X, YouTube.

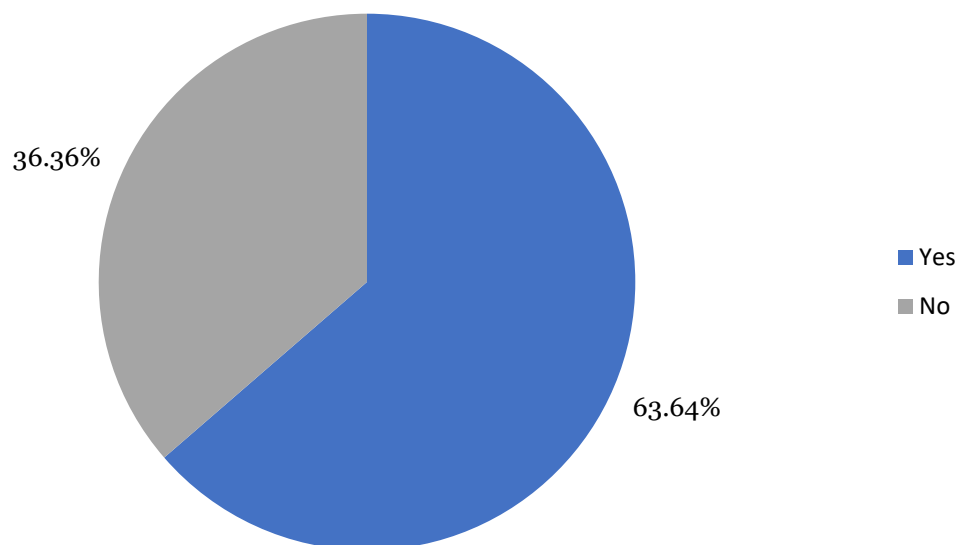
11. Which social media platforms is your company utilizing for marketing educational programs or other events? [Please Select All that Apply]



Comments:

- 7 Responses reference X/Twitter.
- 2 Responses reference YouTube.
- Employees may post education-related conference materials on their personal social feeds to the company's Social Media Policy. For education supported by grants, the association promotes on channels it deems appropriate.
- LinkedIn would be the primary platform for this, targeted at HCPs.
- Not marketing educational programs.

**12. Does your company utilize direct-to-patient social media accounts?
(e.g., Facebook, Instagram, Tik Tok, LinkedIn)**

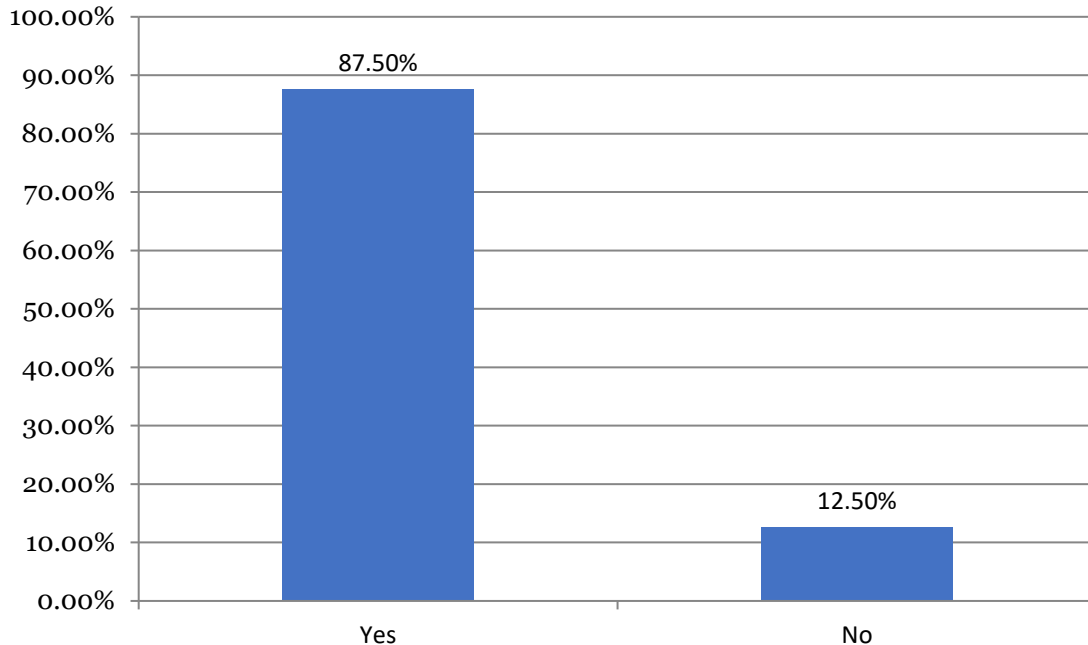


Comments:

- We don't have dedicated DTP social media accounts but rather dedicated campaigns on certain social media accounts on certain social media platforms. For example, our Diabetes account on Facebook which is dedicated to DTP campaigns would be a good example of this. In general, LinkedIn is our most used platform today for HCP audiences and Meta (IG & FB) are our most used platforms for patients.
- We have Facebook, LinkedIn, and Twitter: however, the posts aren't tailored for patients they are written to be read by customers.
- We do some direct-to-patient marketing, but we do not have dedicated accounts for this.
- Use social media platforms to educate.
- Only Primary Social Media Channels.
- Facebook & Instagram.
- Facebook & X.
- Facebook only.

Employee Posts on Social Media

13. Does your company have a policy regarding employee interactions with company social media posts from the employee's personal social media accounts (e.g., comments on company posts)? (please explain in the Comments)



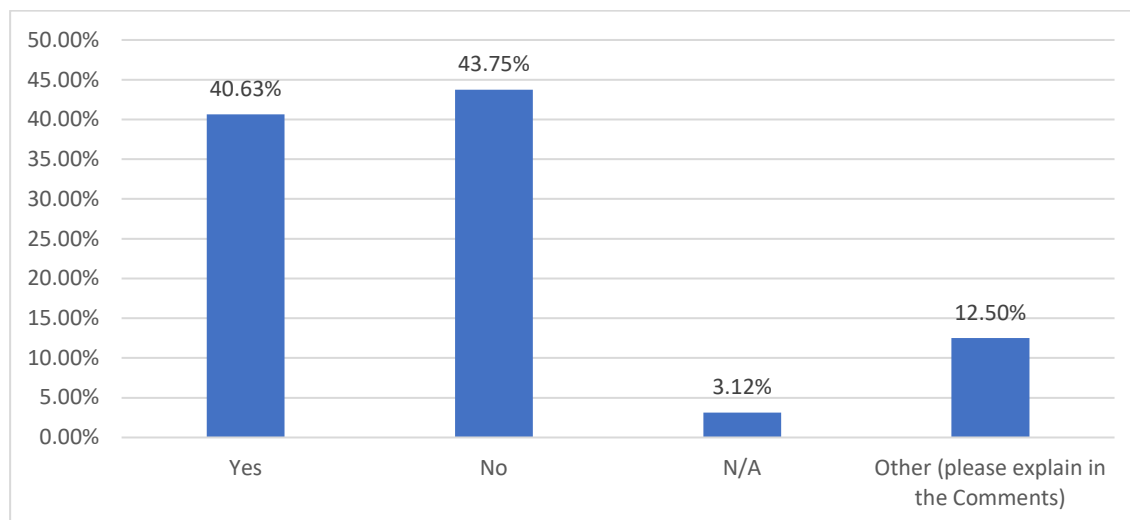
Comments:

- Permitting passively consuming, authoring, and posting on-label information about company products/services; permitting posting information about company awards or honors; permitting engaging and socializing (sharing and liking) posts from company-owned accounts and the use of approved hashtags (ensuring that such posts include a disclosure about working for the company); permitting posting to personal accounts about participation in company-sponsored activities (with certain restrictions).
- (1) Ask first, post later. (2) Even on personal accounts, employees are instructed and expected to get their product claim posts approved through the appropriate media legal review process; though, even that practice is discouraged. Instead, the company asks employees to repost company-created content available on the company's primary account page.
- Yes. Global Social Media Policy. This policy applies to all employees, agents, and contractors when using social media to post content not approved by the Company but related to the Company or its business, including the business of its customers, end-users, suppliers, competitors, and others who interact with the Company.
- We have a policy that applies to all employees, agencies, and other third parties who engage in SM communications related to company products or posts. It identifies specific requirements for being allowed to create posts and rules on how to interact with posts regarding company products or activities.
- We have a social media policy that is specific to employees and employee activity on social media when it relates to our company. The policy allows employees to share approved posts from the company's social media accounts, if the employees share posts, they must disclose

they are an employee.

- Our policy describes requirements related to sharing content on company products and company posts from the employee's personal social media accounts and permissions required to comment on company posts.
- This is not explicitly addressed within the policy however the policy reiterates that all employee behavior on the internet should be within the Standards of Business Conduct.
- Employees may like, repost, or share company-approved posts. We have country-specific policies based on local laws as well - i.e. France.
- Need to disclose affiliation, that they are not speaking on behalf of the company and avoid posts/comments about company products.
- Our policy covers what employees can and cannot post on social media as well as monitoring conducted by our communications team.
- Employees are permitted to like, share, and comment on company posts, provided that they do not comment on products.
- Nothing bars employees from liking company posts, they shouldn't make claims or speak on the company's behalf.
- We have a Social Media policy that defines acceptable and unacceptable interactions on Social Media.
- Employees can like, comment, or reshare company posts with neutral commentary.
- Employees are encouraged to only share posts from official company accounts.

14. Does your company policy permit employees to share/comment on non-company affiliated posts discussing company products, related procedures, and/or patient outcomes? (e.g., independent posts by HCPs or others regarding company products) (please explain in the Comments)



Comments:

Responded “Yes”

- Permitting sharing, liking, and reposting on-label third-party content containing information about our products/services; prohibiting posting patient personal data, including any commentary, photographs, or video without written patient consent.
- It is the employee’s responsibility to ensure that the product to which the content relates, meets its intended indication and intended use for the relevant jurisdiction.
- We do not have a policy on this, other than employees must follow our general promotional guidelines.
- Limited to certain medical employees and company executives; sales personnel are prohibited from sharing/commenting on third-party posts about our products.
- As long as the comments fit within the guidelines of our Social Media Policy.
- Employees, except for approved employees, cannot speak on behalf of the company.
- If it is on the label.

Responded “No”

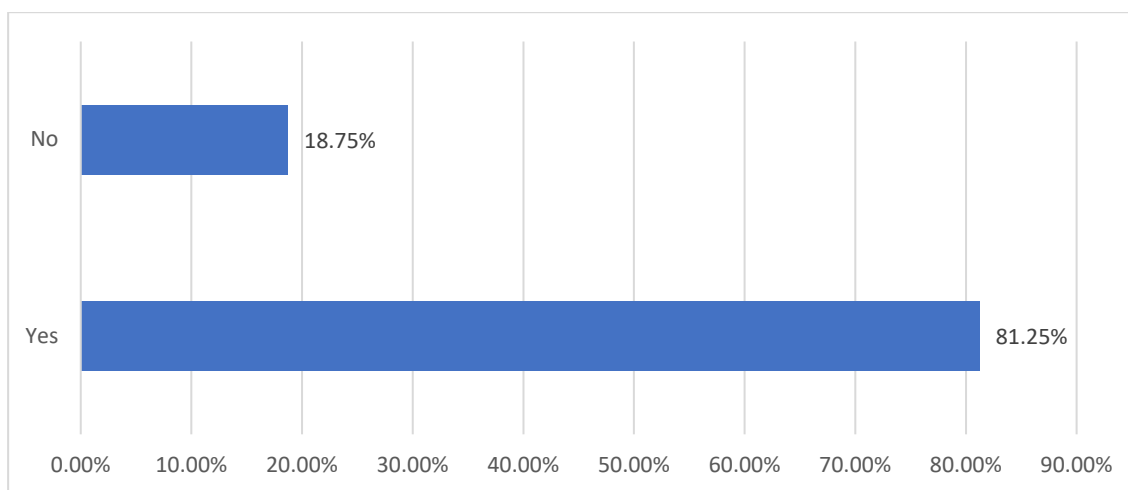
- No. Other than sharing Company-approved content, employees may not post any information regarding the Company’s product or service offerings. It is recommended in the Global Social Media Policy that employees should think carefully about the impact their personal posts may have on their own reputation or “brand” before friending or otherwise interacting on Social Media with any customers, end-users, or others having actual/potential interactions with the Company.
- Company policy permits select employees to speak and therefore post on behalf of the company. Personal posts expressing one’s own opinion about the company or its products must be done in accordance with the company’s Social Media Policy, which covers among other things the need to disclose company affiliation and alignment with the company’s product promotion rules.
- Employees are not allowed to comment on non-company posts and our policy notes we will monitor non-company posts by HCPs to ensure they are appropriate and compliant with product use and labels.
- The policy does provide an exception that at the company’s discretion it may permit such interactions during limited times based on situational guidance that will be provided if the permission is granted.
- We train employees to not comment on such posts. We train employees to refrain from engaging in any off-label posts/commentary, regardless of who the creator is.
- Policy may not explicitly prohibit this, but it is not explicitly permitted and there are many things that we prohibit that would come into play in this circumstance.
- Employees can like the post but not reshare or comment on independent posts by HCPs or others regarding company products.

Responded “Other”

- In limited circumstances. We’ve provided specific direction for employee segments such as Sales or Marketing that may encounter these situations on social media. To ensure they assess these situations appropriately and engage correctly we drafted guidelines that allow them to engage on these types of posts but only within certain limitations. For example, the post must be on the label and cannot include any claims.

- Company policy does not get specific as to what employees can like/comment on except not to make any claims or endorsements of off-label uses of our products or comparisons to competitor products.
- This is not explicitly addressed within the policy however the policy reiterates that all employee behavior on the internet should be within the Standards of Business Conduct.
- No employee engagement with product posts. Employees can engage with the procedure.

15. Does your company have a policy regarding employee interactions with company social media posts from the employee's personal social media accounts (e.g., comments on company posts)? (please explain in the Comments)

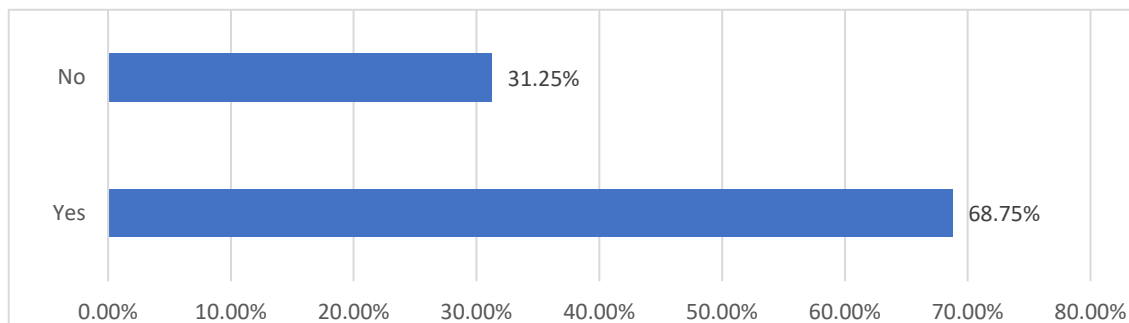


Comments:

- Covered by Global Social Media Policy. Employees may freely share the Company's content that is publicly posted on the Company's website or a Company's Social Media account. Employees must identify themselves as a Company's Employee when doing so. Global Social Media Policy sets forth that employees must be clear and upfront about the fact that they are employed by the Company and that their views do not represent those of the Company, fellow employees, customers, end-users, suppliers, or others working with the Company.
- We have a specific social media policy that is specific to employees and employee activity on social media when it relates to our company. The policy allows employees to share approved posts from the company's social media accounts, if employees share posts they must disclose they are an employee.
- Company policy only permits certain employees to speak and therefore post on behalf of the company. Personal posts expressing one's own opinion about the company or its products are permitted in accordance with the company's Social Media Policy.
- This is not explicitly addressed within the policy however the policy reiterates that all employee behavior on the internet should be within the Standards of Business Conduct.
- Prohibiting creating personal social media accounts for official company business giving the appearance of speaking on behalf of the company.
- People are allowed to like, forward, retweet, etc. official company posts. They can comment on those posts in line with the Social Media Policy.

- As long as the employee's post does not mention a company product, they can like, share, or post content relating to the company.
- Employees are encouraged to only share posts from official company accounts and to comment in a professional, accurate manner.
- We have general guidelines for interacting with the company and non-affiliated companies' social media channels.
- When the post is related to company products or business items advance approval/permission is required.
- They are encouraged to repost/share company social media posts but refrain from adding comments.
- We do not have a policy on this, other than employees must follow our general promotional guidelines.
- The policy provides guidance on the type of interaction with company posts that are permitted.
- We discuss what a 'thumbs up' or 'like' could mean, if doing so on an HCPs post, for example.
- Employees can like, comment, or reshare company posts with neutral commentary.
- Not covered in our current Social Media Policy.

16. Does your company have a policy regarding personal employee social media posts/comments/likes on non-company accounts referencing your company (non-product specific posts)? (please explain in the Comments)

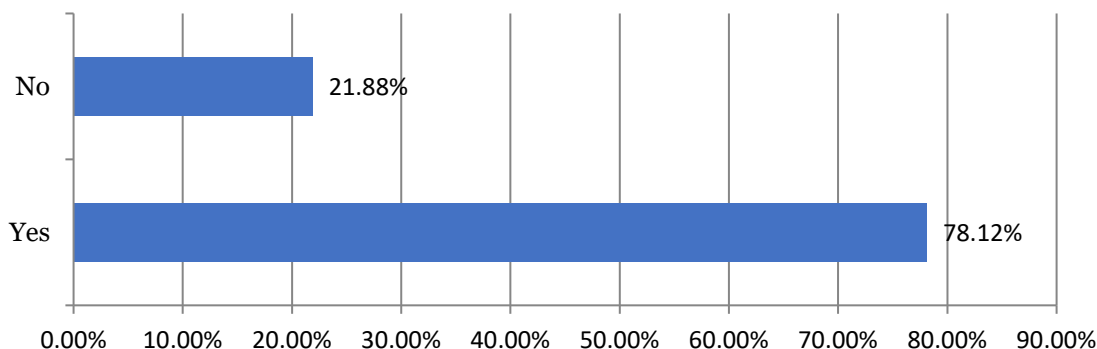


Comments:

- No specific policy. Global Social Media Policy sets forth that employees must be clear and upfront about the fact that they are employed by the Company and that their views do not represent those of the Company, fellow employees, customers, end-users, suppliers, or others working with the Company.
- Yes, this is outlined in our Social Media FAQ which is an appendix of our policy. We provide specific guidance around different areas. For example, we restrict engagement on certain types of posts such as posts that may be making false statements about the company or is around financial performance.
- Personal posts expressing one's own opinion about the company must be done in accordance with the company's Social Media Policy, which covers among other things the need to disclose company affiliation, to protect confidential and proprietary information, and to demonstrate respect for others.

- Company policy does not get specific as to what employees can like/comment on except not to make any claims or endorsements of off-label uses of company products or comparisons to competitor products.
- The policy notes that employees should use a disclaimer, avoid commentary that could appear or actually be a conflict of interest, and use their personal email for those accounts.
- Employees can like, comment, or reshare with neutral commentary if the third-party post does not contain product-related information.
- As long as the employee's post does not mention a company product, they can like, share, or post content relating to the company.
- We do not have a policy on this, other than employees must follow our general promotional guidelines.
- We have general guidelines for interacting with the company and NON-Affiliated social media channels.
- Prohibiting correcting misinformation regarding the company (e.g., Wikipedia page updates).
- Employees are restricted from referencing our company with permission to do so.
- As long as their comments are in line with our Social Media Policy.
- Yes, but guidance is provided on what to avoid.

17. Does your company have a policy regarding personal employee social media posts/comments/likes on non-company accounts referencing your company products? (please explain in the Comments)

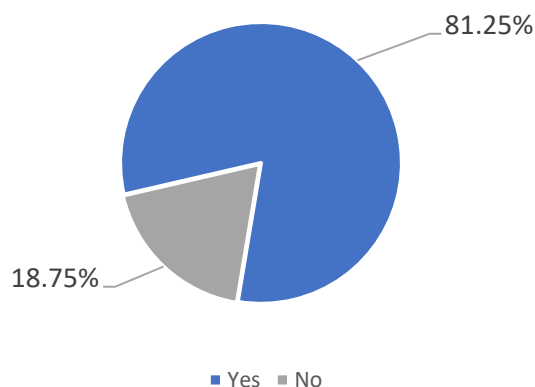


Comments:

- Prohibiting correcting misinformation regarding the company products (e.g., Wikipedia page updates); permitting sharing, liking, and reposting of on-label third-party content containing information about our products/services.
- Company policy does not get specific as to what employees can like/comment on except not to make any claims or endorsements of off-label uses of company products or comparisons to competitor products.
- The policy notes that employees should use a disclaimer, avoid commentary that could appear or actually be a conflict of interest, and use their personal email for those accounts.

- Global Social Media Policy: Other than sharing Company-approved content, Employees may not post any information regarding the Company's product or service offerings.
- It is the employee's responsibility to ensure that the product to which the content relates, meets its intended indication and intended use for the relevant jurisdiction.
- Limited to certain medical employees and company executives; sales personnel are prohibited from sharing/commenting on third-party posts about our products.
- We have a social media policy that is specific to employees and employee activity. This policy includes direction on this.
- We have general guidelines for interacting with the company and NON-Affiliated social media channels.
- We do not have a policy on this, other than employees must follow our general promotional guidelines.
- They are advised to keep these posts professional and accurate with no off-label promotion permitted.
- Employees cannot respond to or like any posts [about a company product] until they have been endorsed by the company.
- Employees cannot interact with third-party posts that include company product information.
- It is not permitted except by authorized pre-approved individuals.
- As long as their comments are in line with our Social Media Policy.

18. Does your company have a policy regarding personal employee social media posts referencing HCPs or customers (including tagging)? (please explain in the Comments)



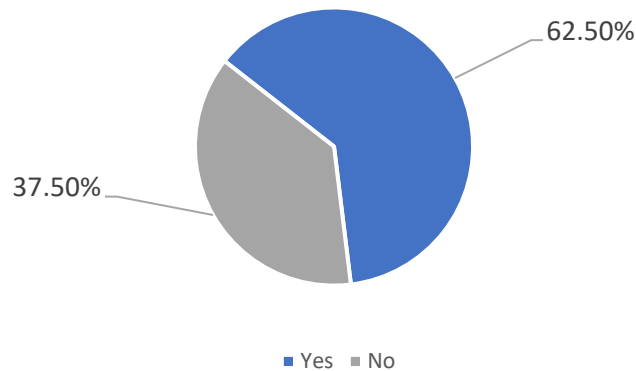
Comments:

- In our policy we do list guidance around this that states employees cannot personally endorse a physician or customer through their personal social media accounts. This includes recommending or suggesting a specific individual attesting to the quality of a specific individual's services or otherwise characterizing a physician/customer or their work (e.g., stating that a doctor is amazing). As an extension on this, we've provided specific direction for employee segments such as Sales or Marketing that may encounter these situations on social media where a tag or mention may be appropriate. To ensure they assess these situations appropriately and engage correctly we drafted guidelines that allow them to reference an HCP

in their posts but only within certain limitations and with approved language.

- Currently, guidance is that only the company-created posts can tag an HCP's account when they are fulfilling a faculty speaker role at one of our company-driven events. The post is not meant to serve as advertising for the HCP, but instead bring awareness to an upcoming educational event.
- Employees cannot respond to or like any posts until they have been endorsed by the company. We also recommend that our employees are not tagged.
- This is restricted and no tagging of customers is permitted.
- This is not explicitly addressed within the policy however the policy reiterates that all employee behavior on the internet should be within the Standards of Business Conduct. As well as, the policy notes that employees should use a disclaimer, avoid commentary that could appear or actually be a conflict of interest, and use their personal email for those accounts.
- Customers, vendors, healthcare professionals (HCPs), healthcare organizations (HCO), or patients must not be posted or disclosed without the express written consent of the customer, vendor, HCP, HCO, or patient. Also, do not endorse healthcare providers for the purpose of inducing the purchase, use, or recommended use of company products.
- Our Social Media Policy extends generally to how our employees conduct themselves on social media platforms. To the extent such conduct could include customer references, it would be covered by our policy, which touches on topics such as the privacy rights of others and confidential information.
- Prohibiting engaging with company customers, business partners, and investors for the purpose of endorsement/referral or benefit of HCP in any way.
- Where HCPs/customers are referenced in posts, this must be in line with our internal policies with appropriate consents in place.
- Employees cannot interact with HCP or customer social media posts that include product/procedure information.
- We do not have a specific policy on this, other than employees must follow our promotional guidelines.
- It is not permitted except by authorized pre-approved individuals.
- As long as their comments are in line with our Social Media Policy.
- Covered in our social media policy and Product Marketing.
- Have to have authorization from the HCP/Customer.
- Same principles as what we direct re: LinkedIn.
- They cannot post on behalf of the company.

19. Does your company have a policy regarding personal employee social media posts on topics relevant to the medical technology industry (e.g. posts or blogs on technical issues, wellness, health)? (please explain in the Comments)

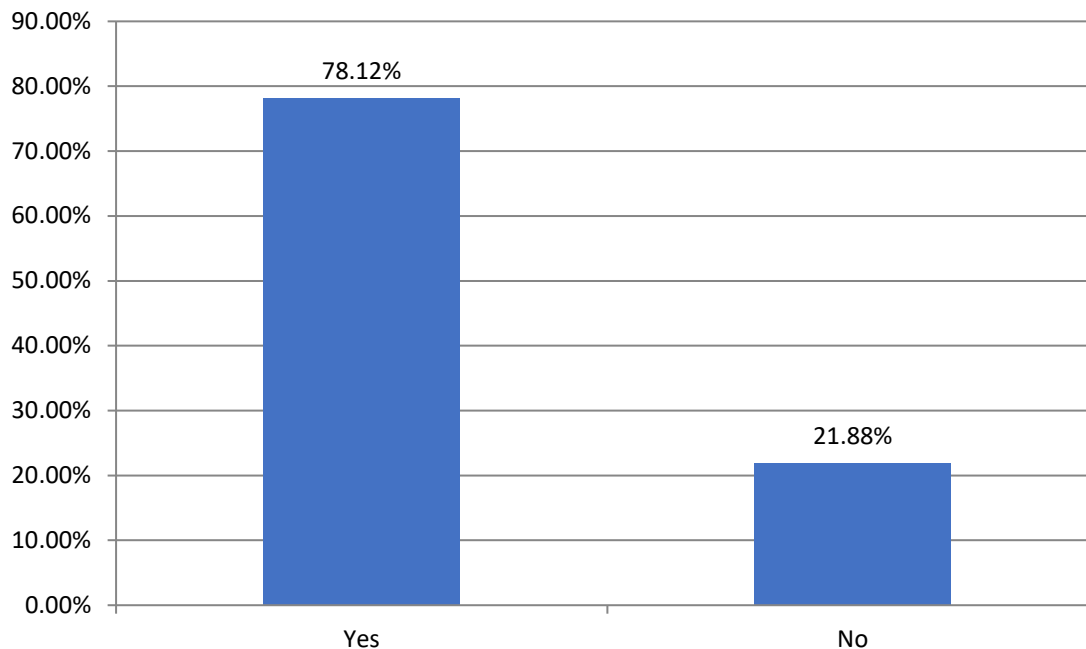


Comments:

- This is not explicitly addressed within the policy however the policy reiterates that all employee behavior on the internet should be within the Standards of Business Conduct. As well as, the policy notes that employees should use a disclaimer, avoid commentary that could appear or actually be a conflict of interest, and use their personal email for those accounts.
- Yes, this is outlined in our Social Media FAQ, which is an appendix of our policy. We provide specific guidance around different areas. For example, we restrict engagement on certain types of posts such as posts that may be making false statements about the company or is around financial performance.
- Global Social Media Policy does not apply to content that is unrelated to the Company or its business, even if involving employees although the Company encourages employees to use good judgment at all times when using Social Media.
- If posting about our company or the medical device industry, employees should be clear and open about the fact that they are an employee and their views do not represent those of the company.
- Employees are directed not to share company confidential information, comments on products or services, or to post content that brings the company's brand or reputation into disrepute.
- It is permitted so long as it is not directly related to company areas of business and complies with behavioral expectations outlined in the Code of Conduct.
- Our Social Media Policy extends generally to how our employees conduct themselves on social media platforms. It is not topic-specific or limited.
- We have general ground rules in our digital communications policy that cover personal social media use, but it doesn't go to that level of detail.
- Prohibiting sharing, liking, or reposting information created by third parties about off-label uses of our products/services.
- Covered in the Social Media policy - employees can like/comment/share if there's no specific product information.

- We do not have a specific policy on this, other than employees must follow our promotional guidelines.
- As long as their comments are in line with our Social Media Policy.

20. Does your company have a policy regarding the use of inappropriate or offensive language in personal social media posts? (please explain in the Comments)



Comments:

- This is covered by Global Social Media Policy: Employees must ensure their Social Media activity is consistent with the Company's policies, including: Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated. Any Social Media conduct that may adversely affect an employee's job performance, the performance of fellow employees, or may otherwise adversely affect customers, suppliers, end-users, others, or legitimate business interests of the Company may result in disciplinary action up to and including termination.
- Policy notes that their online behavior should be professional and to the same standards outlined in our Code of Conduct including instructions to not engage in any interactions or communications that could be perceived as unprofessional, discriminatory, harassing, or otherwise inappropriate.
- Our policy restrictions on personal social media usage are intentionally vague so as not to appear as though we are limiting employees' free speech, but there is a focus on careful communication, reminders of the reputational risks of using social media, and emphasis on good judgment.
- Should refrain from using inappropriate or offensive language in posts about the company and refrain from sharing/liking posts about the company that contain inappropriate/offensive language.
- While very difficult to monitor this, if it comes to our attention, we reserve the right to have the employee remove inappropriate or offensive language in personal posts.

- Employees must refrain from harassment, discrimination, and inappropriate behavior as outlined in the employee handbook and corporate policies.
- Our Social Media Policy calls for the use of care and respect when communicating on social media, not to use disparaging language.
- Employees are directed not to post offensive language and content that brings the company's brand or reputation into disrepute.
- Inappropriate or offensive language is strongly discouraged; it is prohibited during working hours or via company equipment.
- We emphasize that they are representing the organization and should therefore conduct themselves as such.
- The policy states all employee behavior on the internet should be within the Standards of Business Conduct.
- Employees are responsible for their own actions, be mindful of how your posts may be interpreted.
- We do not have a policy on this, other than employees must follow our general promotional guidelines.
- Our policy includes a section around "workplace issues" and "personal opinions".
- As long as their comments are in line with our Social Media Policy.
- Explicitly stated in our Social Media Policy.
- More general in keeping posts general.
- Be respectful.