

AdvaMed Device & Diagnostic Compliance Group

April 2025

Educational Grants Survey

Distributed: March 4, 2024 – April 7, 2025
Collated: April 10, 2025
Questions: 47
Submissions: 35
Contacts: Ida Nassar, inassar@advamed.org
Quentin Roemer, groemer@advamed.org



BACKGROUND

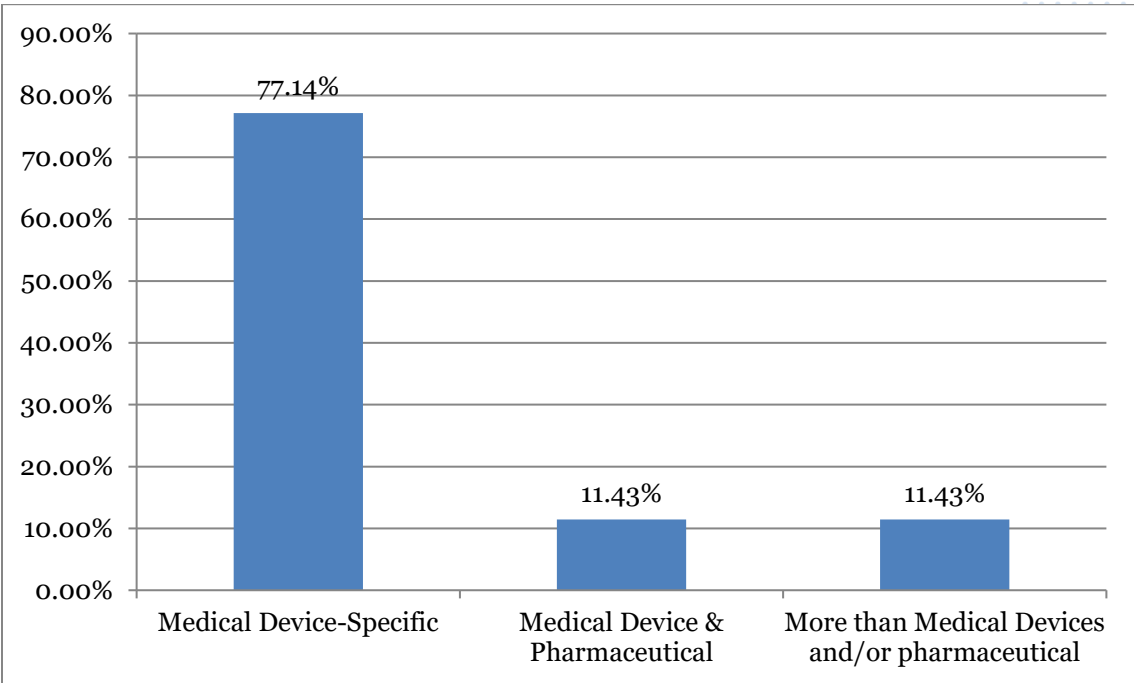
AdvaMed surveyed its members on their compliance policies related to Educational Grants. Thirty-five companies completed the survey in March - April 2025. This document summarizes the survey responses, including additional commentary submitted by some (but not all) companies. The responses reflect a broad cross-section of company policies and are not intended to reflect all medical technology companies.

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. 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 Educational Grants.

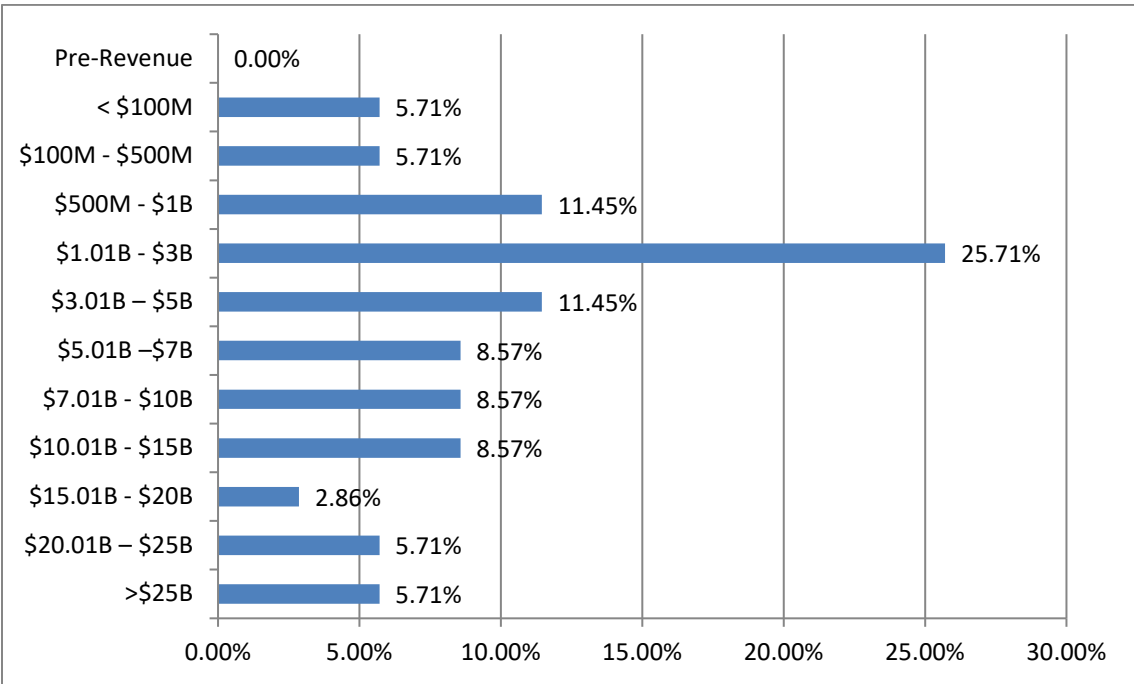


Demographics

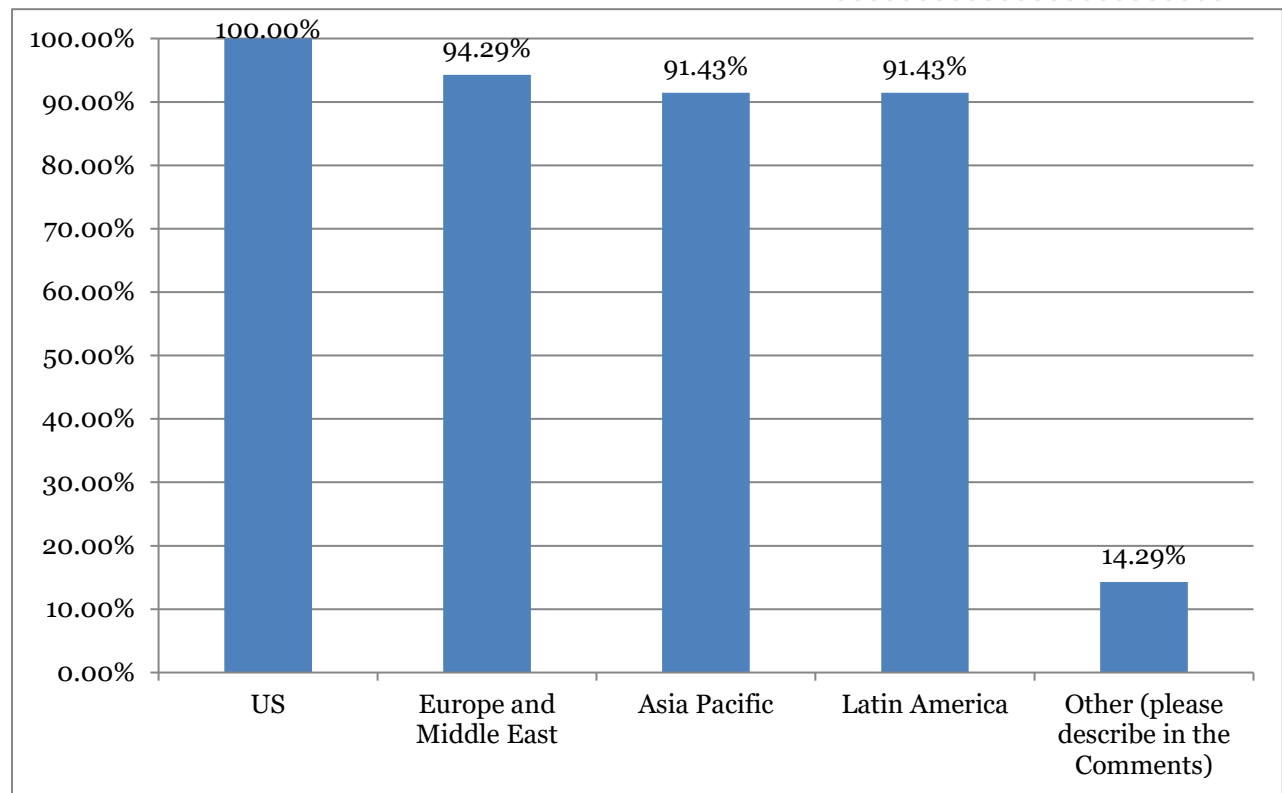
3. Which below best describes your company?



4. What was your Company's 2024 worldwide device-related gross revenue?



5. In what regions does your company operate (Please select all that Apply)?

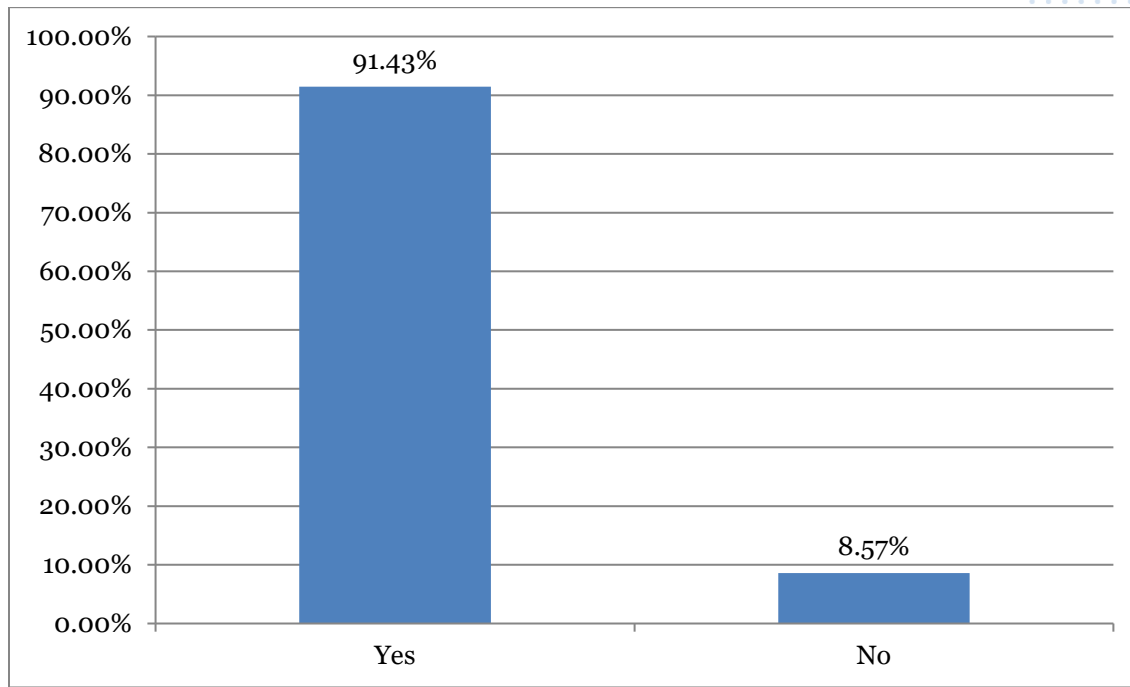


Comments:

- To Confirm: we operate in North America (US & Canada), Latin America (including Central America), Europe Middle East and Africa, and Asia Pacific (including Australia and New Zealand).
- We are a global company with 3 regions - USCAN, International, and Greater China with a presence in more than 160 countries.
- Although our parent company operates in locations throughout the world, our answers relate only to the US Market.
- North America (Canada + US), Africa, India.
- Latin America and Canada.
- Africa, China, Russia.
- Global.

Educational Grants

6. Does your company review and approve educational grant requests in all regions in which it operates?

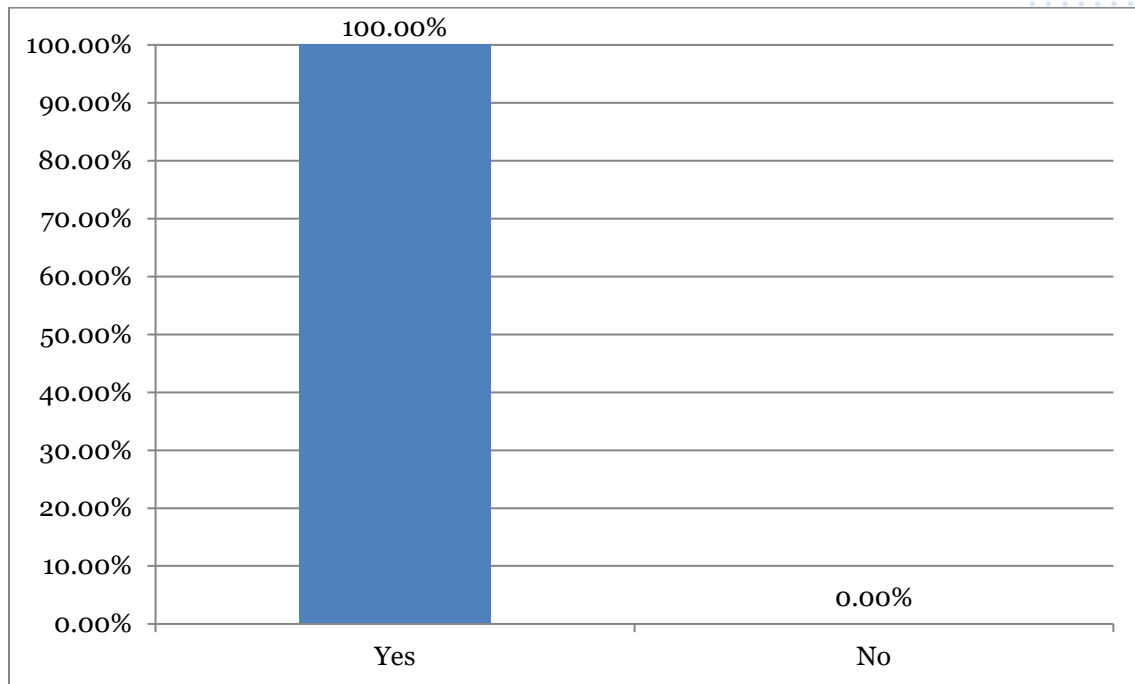


7. If you answered “No” to the previous question, please explain below. If you answered “Yes” to the previous question, please respond “N/A.”

Responses:

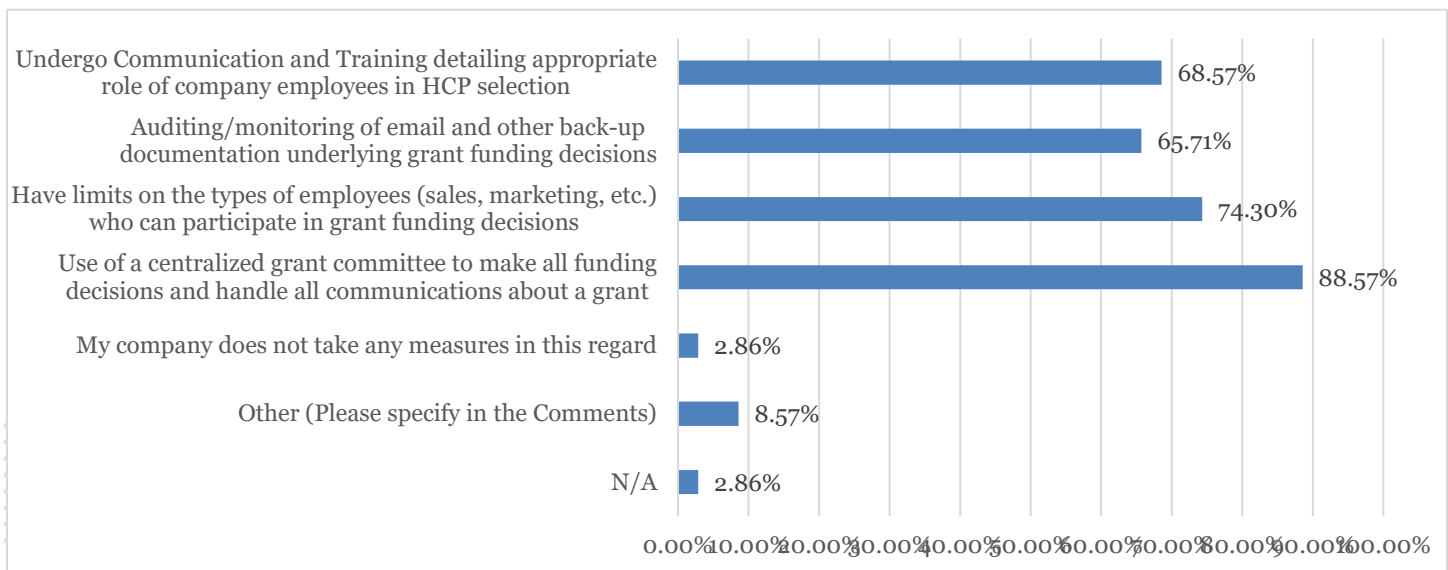
- In our US organization, we primarily review requests originating in the US.
- Educational grants are not available in all regions we operate.
- Only have an independent review process in the US.
- Grants are not yet available in all regions.

8. Does your company review the Third-Party Educational Conference venue, agenda, and other attributes as a condition precedent to funding an educational grant?



Note: All respondents also answered "YES" to the same question in 2023 (i.e. 2023 – 2025 responses match 100%).

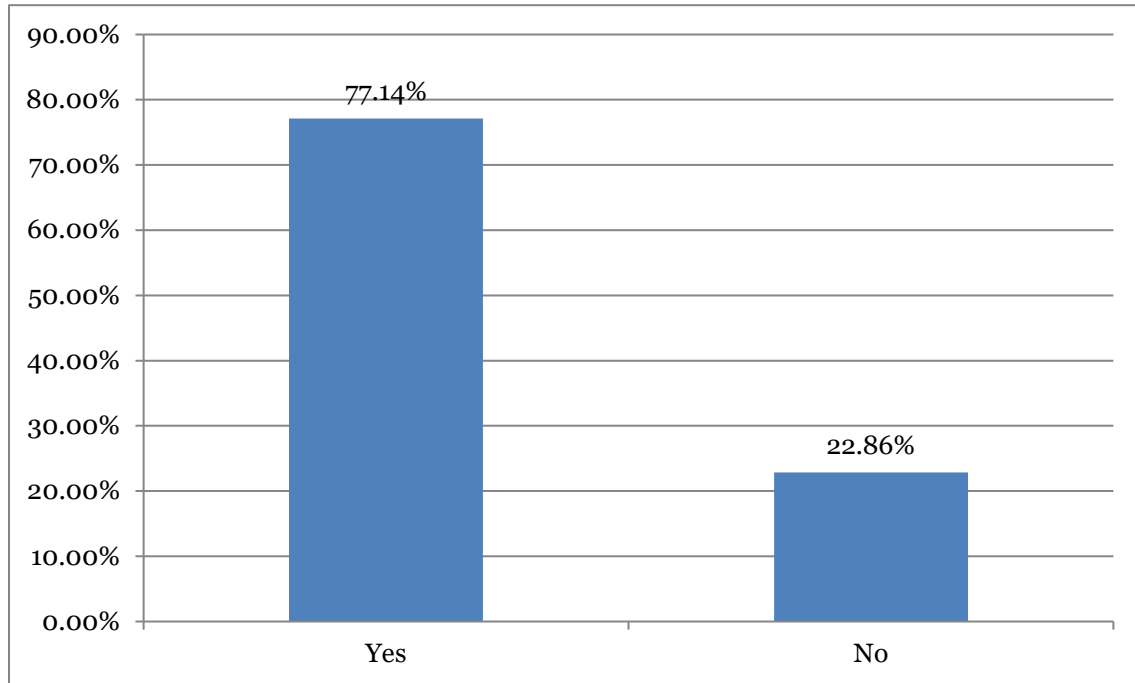
9. If you answered “Yes” to the question above, what measures does your company undertake to help ensure compliance with accepted ethical standards (Select all that Apply)?



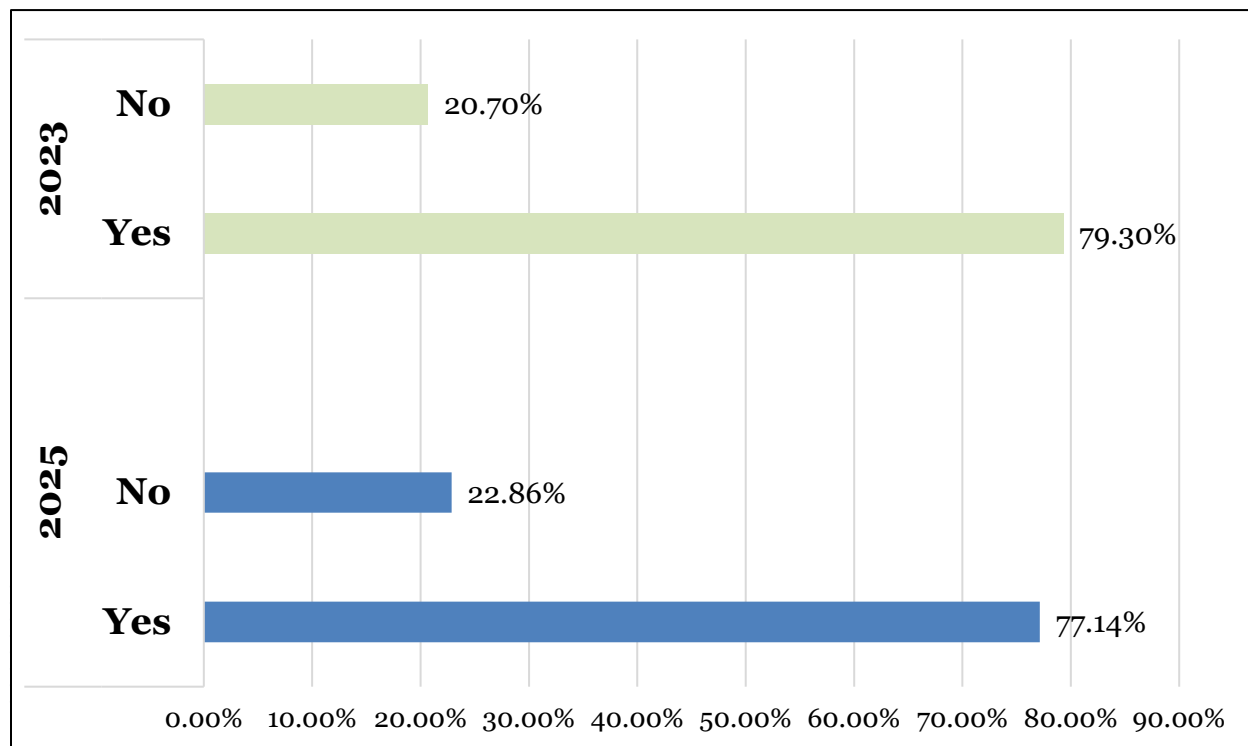
Comments:

- We have a detailed grants policy that outlines who can provide input into Educational Grants. All grants are submitted by the organizations through our online portal and screened by our grants coordinator prior to routing to the committee for review and approval. Sales and Marketing cannot be involved in the grants decisions.
- Also: Have limits on the types of employees (sales, marketing, etc.) who can participate in grant funding decisions. We have controls in place to manage, e.g., grants budget and products available for in-kind; no Commercial involvement.
- The Grants Committee (that does not include sales) has the only authority to approve grant funding or product support requests, all documentation for the request is saved and an agreement is signed by both parties before the product or funding can be released.
- Our company is in the process of establishing centralized grant committees in international regions- not all regions have a grant committee at this point in time. Our policy guidance indicates that the grant review process must be separate from the commercial interests of the company, and our grant committees mechanically limit sales and marketing involvement upon establishing grant committees.
- We have limitations to whom educational grants can be provided to as well as for what kind of expenses grants may be used for. In addition, we provide assessment forms and legal templates to team members in charge of reviewing and an online submission portal for grant requests. Educational grants to certain Third-Party Conferences are also subject to additional approval by industry associations (e.g. Conference Vetting System in EMEA).
- We are implementing a technology for all third-party funding requests and approval workflows. This will help us monitor if and when the same TPOEE requests funding from both a grant and sponsorship perspective. It will also help us monitor if funding is improperly categorized.
- Different Business Units and Regions may manage grants that are not reviewed at the corporate level.

10. Does your company specifically review gaps within the agenda when assessing events?



2023 to 2025 Comparison Chart



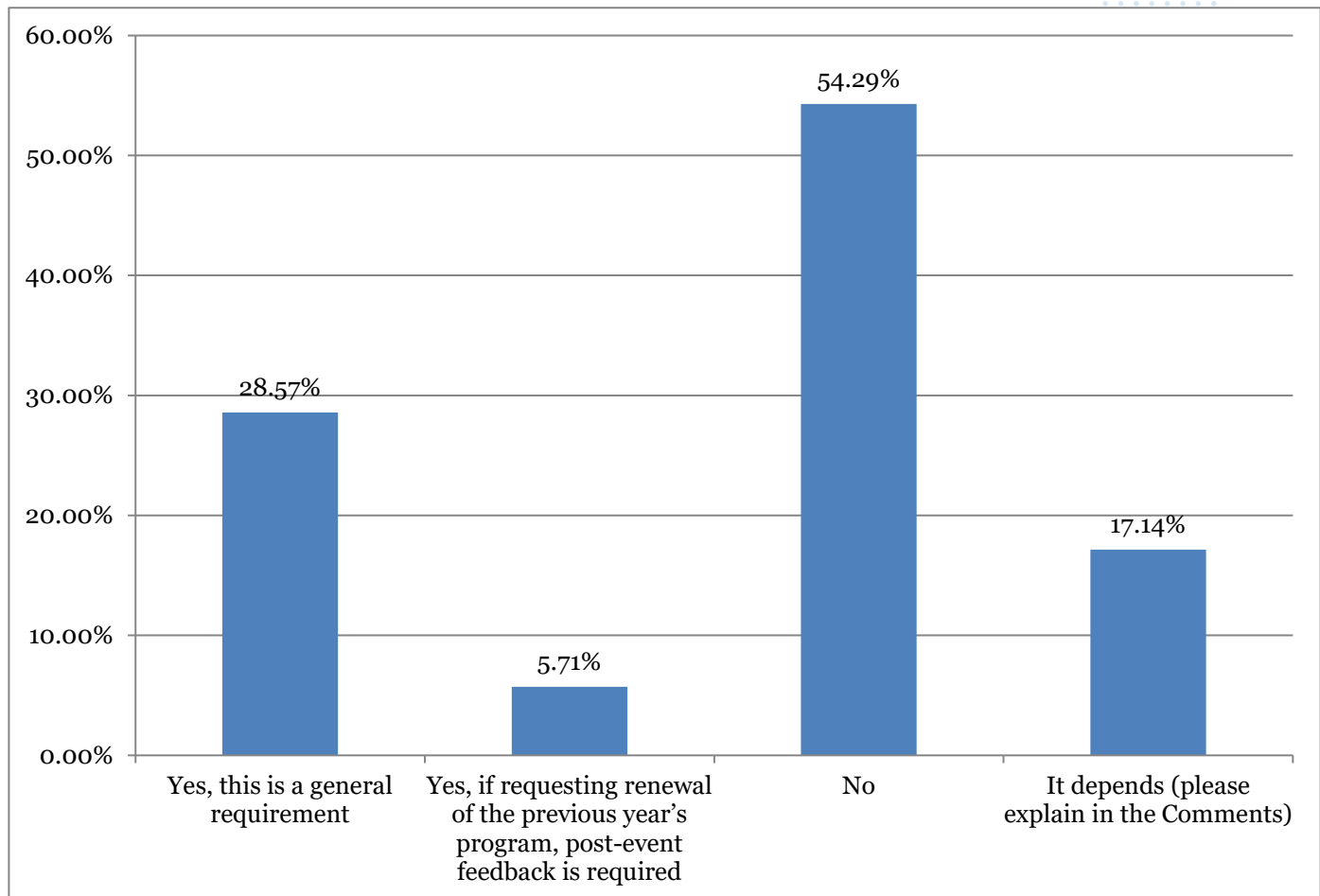
11. If you responded “Yes” to the previous question, how does your company determine if an agenda gap is too large? (If you answered “No” to the previous question, please answer “N/A” below)

Responses:

- Meals, refreshments, and hospitality must be modest in value, subordinate in time and focus to the educational purpose of the program and consistent with the program provider’s guidelines. In addition, the ratio of education time to leisure time must be such that the educational content makes up the majority of the program. There should be no significant gaps in the program which would permit Healthcare Professionals to engage in non-scientific or non-educational activities. For example, early morning sessions should not be followed by late afternoon or evening sessions with large blocks of free time in between.
- Our company evaluates agenda gaps by assessing the balance between educational content and unstructured time. If the gap appears excessive, we consider factors such as industry standards, the typical duration of similar programs, and whether the break could lead to undue influence or misalignment with the program's educational objectives.
- Look at agenda gaps to see what break may be for (i.e., at a ski resort and long break mid-day for participants to enjoy outdoor activities). Decide if we are willing to support with product/funding if it's appropriate to the request (i.e., get enough time with attendees, hands on workshop with product, etc.)
- We review the program in its entirety, agenda gaps would only be one element of that review. as a stand-alone issue, gaps in the agenda would not necessarily be cause for decline. however, gaps in the agenda plus resort destination plus elements of entertainment and recreation may be cause for decline.
- If the gaps plus the venue create a "draw" that is focused on recreation/entertainment, then we will not fund it. E.g., large gaps in the middle of the day when the event is at a ski resort, or a multi-day meeting when sessions only take place in the morning and it is in a beach location.
- "In the Americas we assess whether the program is for a CME certification. We assess if there are more than 4.5 hours of content and if does not the case we may not fund the grant and rather would fund a sponsorship with exhibit only.
- Additional scrutiny will be given to an educational program with an agenda during which HCP attendees are provided with signifiation amounts of "Free time" (especially the program is being held in a resort or luxury destination).
- This is a discussion point for the Global Grants Review Committee. We screen the venue, activities, etc., to ensure they’re substantive. If gap is deemed too large, request would be rejected.
- We would question if there is a several hours-long gap in content, esp. if it's being held at a venue or location in which recreation or entertainment could be pursued during the gap in agenda content.
- Weigh the time allocated for education vs. gap time. Is the conference organizer providing non-educational activities during gap time, venue/location, etc.
- Gaps in the program’s agenda should be assessed to determine whether the number of breaks interferes with the program’s educational content.
- We consider agenda gaps, in conjunction with location and other events in the area to ensure that the agenda is primarily focused on education.

- A gap in the agenda is assessed on a case-by-case basis and is one factor considered when reviewing the grant request.
- Case-by-case evaluation that considers total amount of time, specific hours, and other activities available to attendees during the gap
- Comprehensive assessment involving nature of program, venue, agenda, accommodations etc.
- It is event-dependent in relation to the location of the event.
- We ensure that the agenda is topically appropriate to our technology.
- The information provided is reviewed to ensure the event is conducive to patient care and education.
- No specific time frame by policy, but unreasonable long gaps without educational content or that could indicate non-compliant activities (e.g. sightseeing, tours, etc.).
- Judgement call based on full context of event, venue, location, etc.
- Based on an 8-hour day, a 4-hour gap would be too large. Also, if there is an entertainment gap for skiing, golf, or tennis we deny the request.
- Gaps larger than 2 hours are flagged and if we feel the gaps are in the program to allow for entertainment or other activities near the venue, we decline.
- We aim for a minimum of six hours of education per day.
- More than a few hours with no explanation of events.

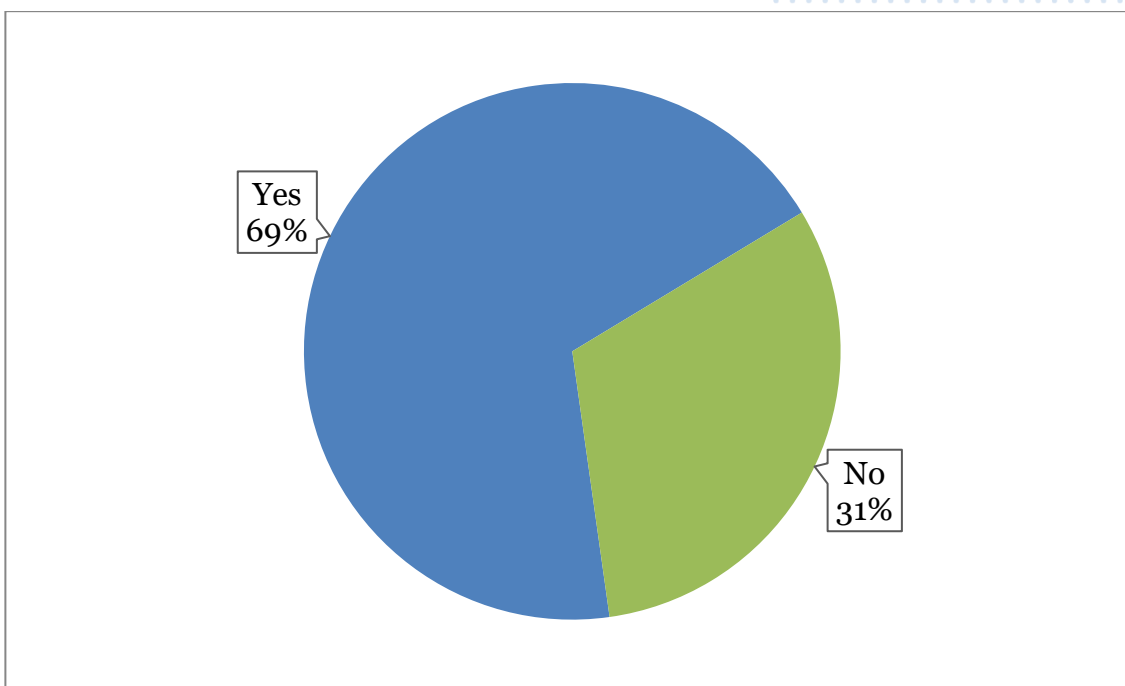
12. Does your company require post-event feedback for evaluation (i.e. was the event an effective educational program)? (Please Select all that Apply and Explain in the Comments)



Comments:

- Our educational grant agreement requires a post-event cost accounting report and return of unused funds
- This is not required but often elicited if a request to fund the following year comes in.
- For monetary support, we ask for a program report within 45 days of completion of event.
- We request post-event documentation through a grant usage report.
- This is required for all programs where grants have been approved.
- Surveys, proof of deliverables (agendas, images, slides) etc.
- Our current process is manual and as a result, it is more challenging to collect and track feedback, however, we are transitioning to a global system where we could collect post-event feedback.
- Looking to potentially implement in the future based on resources/capability to do so.

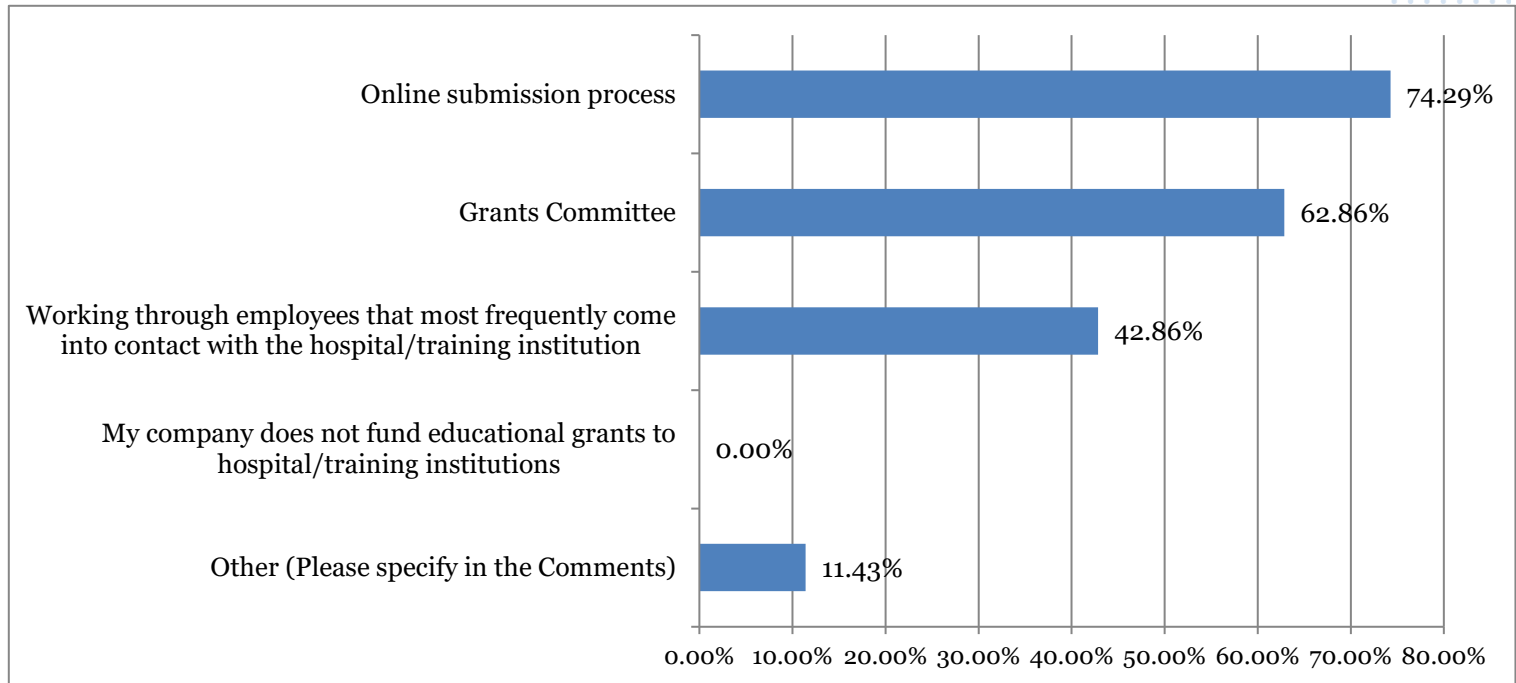
13. Does your company support fellowships through educational, charitable, or other third-party organizers?



Responses:

- We have a company fellowship program, which accounts for the majority of the available funding, and we also fund through a third-party.
- Yes, on a case-by-case basis; don't have a formal program. Our policy permits support if an event is organized by a third party.
- Some companies use a third-party; some have an independent HCP committee.
- Rarely.

14. Who from your company can receive educational grant requests from a Third-Party Educational Conference? (Please Select All that Apply)



Comparison Chart

Responses	2023	2025
Online submission process.	76%	74.29%
Grant Committee	69%	62.86%
*Working through employees that most frequently come into contact with the hospital / training institutions.	17%	42.86%
My company does not fund education grants to hospitals/training institutions.	3.45%	0%
Other	N/A	11.43%

**Note: This question/answer choice relates to receiving grant requests for review, not decision-making for grant requests. Compare with 74.30% of companies responded that they limit/exclude sales personnel from decision-making on grants (Question 9 above).*

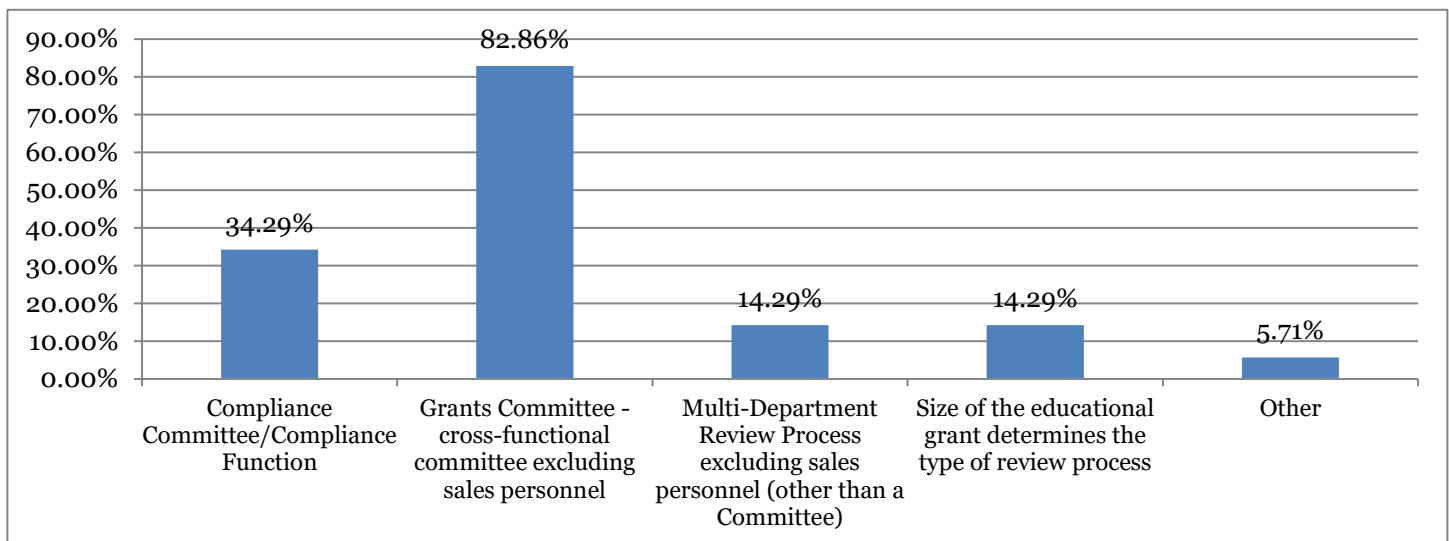
Comments:

- Company is in the process of deploying an online submission process and grant committee structure in international markets. Grants committee and online submission process is limited to the US. Latam and EMEA have grant committee but is currently still working through commercial employees who field grant requests on behalf of the hospital/training institution.
- We do not have a Grants Committed per se. Then information is funneled through our Grant

approval process. We use Salesforce to manage all requests and approvals.

- Online submission through our centralized grant portal is required and then routed to a grants committee for review.
- Research or Product Development Teams may receive requests and send to the Grants Committee.
- Any requests are instructed to be directly to our online portal to go through the official review process.
- Online for the US and Canada, and other regions via email through the management teams.
- The submission process in the Americas is via an online portal, but this varies by region.

15. With respect to Third-Party Educational Conference requests for educational grants, who at your company decides whether to fund a request? (Please Select all that Apply and Explain in the Comments)

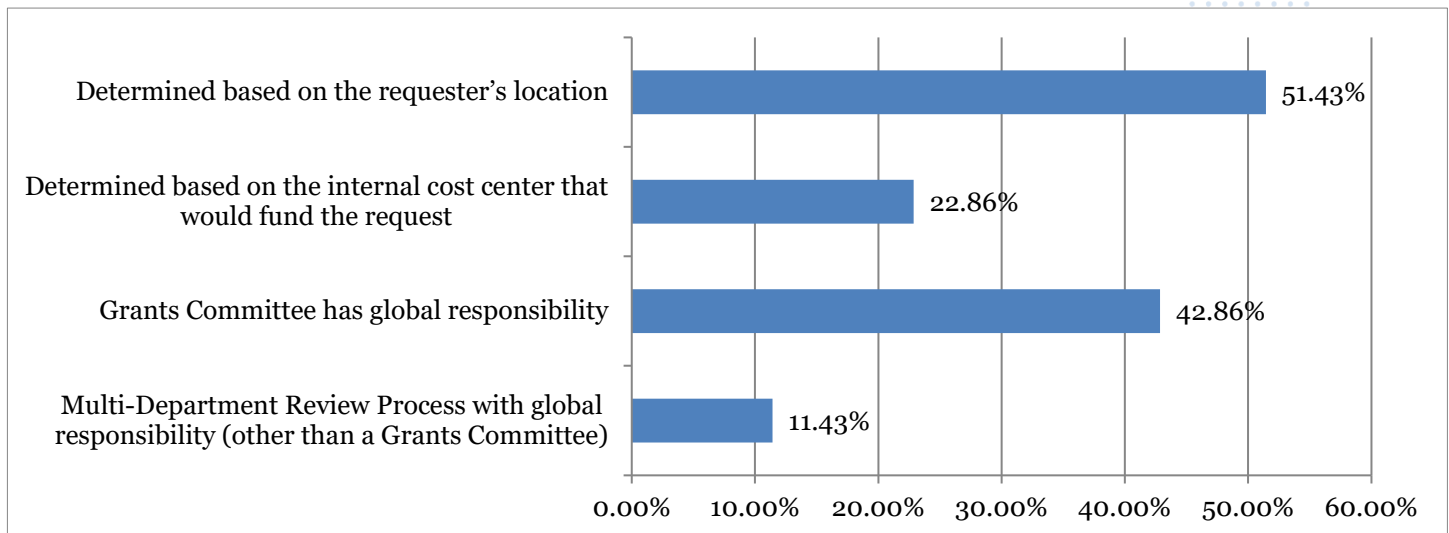


Comments:

- Grant committees in US decide whether to fund a request; each US division has a Grant Committee and Coordinator supporting the Committee's operations. In EMEA, grant committee only reviews grants above a certain dollar threshold. In all international regions (except US), the compliance function reviews and approves grant submissions. Once grant committees are stood up, grant committees will be responsible for funding approval in international regions.
- We have an educational grant review committee comprised of medical affairs representatives and legal and compliance representatives. Sales and marketing are not allowed to participate in the committee review process.
- Grants below a certain dollar threshold are reviewed by regional grants committees. Global Grants Committee reviews and approves grant requests above the threshold.
- In the Americas, grants are reviewed by the Grants Committee and in other regions the size of the educational grant determines the type of review process.
- The Grants approval process as mentioned above. However, if the Grant request is greater than \$1K, it will require compliance approval.

- Within the Americas, Compliance is the final sign-off on any funding requests.
- Global Product Teams have to decide if the request is aligned with strategy and funding.
- Marketing, Compliance Officer & CFO.
- Compliance, CFO, VP of Marketing. Solicit.

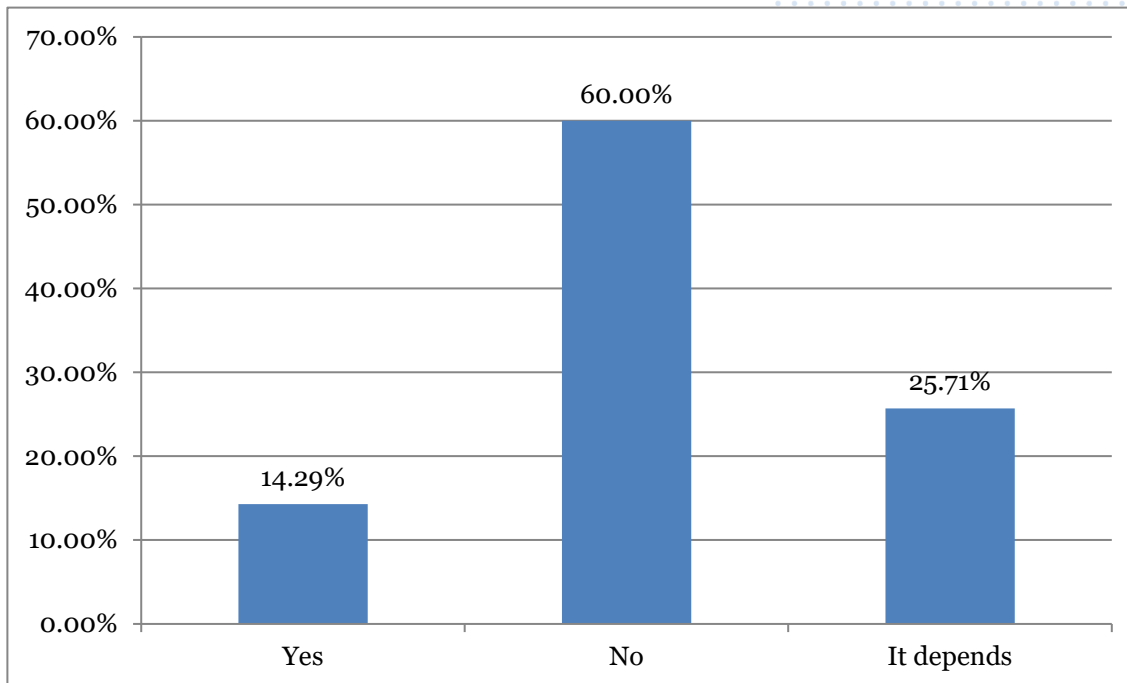
16. With respect to *cross-border* Third-Party Educational Conference requests for educational grants, who at your company decides whether to fund the request? (Please Select all that Apply and Explain in the Comments)



Comments:

- We have an educational grant review committee, and depending on the location of the conference and if it will be a cross-border request, then we will pull in the applicable legal and compliance business partners for the applicable region.
- Will attempt to direct to most applicable regional grants committee. grants in support of international meetings are traditionally reviewed and dispositioned by the US committee.
- Regions are responsible for deciding on grants within their border. In the event a request goes beyond a regional border, a Global Grants Committee makes the decision.
- In most cases we have Grants-Committees set up by geographic region or country.
- When a grant request comes in we review with committee in the location of the event.
- Areas not within the US would have their own grants committee to review.
- Marketing, Compliance Officer & CFO.
- Global Product Team.
- Same processes as above.

17. Does your company support requests for in-kind grants/donations of products or equipment in locations where the company does not currently have a registration or license?



Comments:

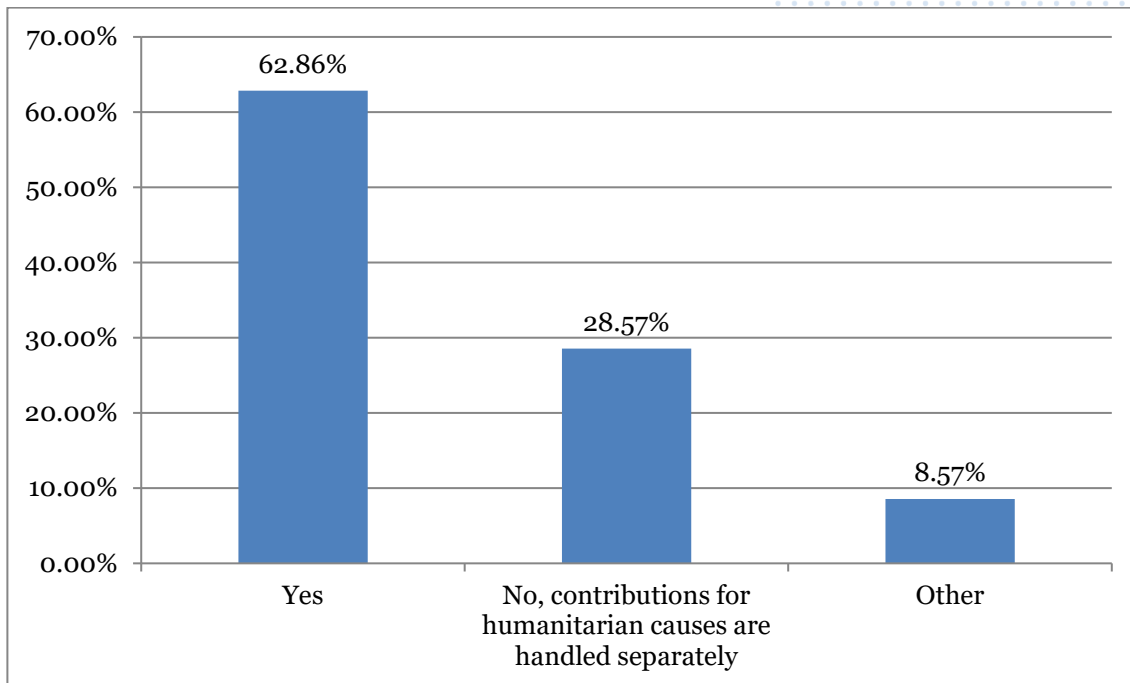
- (For US) In some cases, product donations will be provided to third-parties for humanitarian trips to treat patients in countries our company does not do business or in which the particular products aren't registered for sale. In those cases, local regulatory and legal team members are involved to ensure compliance with laws (for example, obtaining humanitarian exceptions or otherwise complying with import regulations).
- Only for humanitarian reasons restricted to HCPs trained in our technology. A regulatory team reviews and approves the request.
- This depends on the location of the grant request and whether the location has registration requirements.
- US Compliance works with global HQ to determine what is allowable for international product donations.
- These situations are on a case-by-case basis.

18. If you responded yes to the previous question, what processes and/or criteria (e.g., HCP involvement) does your company have in place to review, approve, and manage these requests?

Responses:

- We have an SOP that governs the process of submission, review and approval of grants and donations. Although each request is considered on individual merits, Grants and Donations generally are not made (1) to individuals, (2) to for-profit physician practices, groups, associations or entities, (3) to patients, or (4) on behalf of customers or patients. Grants and Donations are considered without regard to historical or prospective use or purchases by applicants of the Company's products or services. The Company's Sales and Marketing Personnel are not involved in reviewing, approving or funding Grant or Donation requests.
- Prior to advancement to the Grants Committee, the list of products requested for permanent grant/donation of products is reviewed by personnel with knowledge of product registrations, such as Regulatory Affairs personnel or product managers with country-specific knowledge.
- These are routed for review by the global grants committee. We typically ensure that the requester is where the product is being provided and any export requirements are assumed by the requestor.
- Review on a case-by-case basis through the respective Grants Committee in collaboration with Regulatory Affairs / Trade Compliance and Legal.
- See comments above plus it has to be a non-profit, local marketing team needs to approve in the US. Not in OUS.
- The information is reviewed by the Compliance and Legal team before it is approved.
- Same grant approval request process. Grant agreement must address disposition of equipment.
- These requests are also reviewed by the Business Unit and Regional Grants Committee.
- This is often to support mission trips or educational programs in underserved areas.
- These are unlikely but possible depending on specific circumstances.
- Country dependent
- It depends

19. Does your company handle requests for contributions to humanitarian causes (e.g., Doctors Without Borders) under the same process as other educational grants or charitable contributions?



Comments:

- In the US, requests for contributions to humanitarian causes go through the same process as other educational grants. Internationally, they do not- humanitarian causes go through a separate evaluation process.
- Product donations are reviewed and approved under the same process. Medical Mission Trips and Humanitarian Aid are managed through a separate legal entity/foundation.
- Requests to support mission trips are assessed on a case-by-case basis and may require additional due diligence.
- This is handled through our foundation or charitable contribution process.
- Certain donations are handled by our ESG team, for example Red Cross.
- These are primarily handled by our Social Investing Team or the Company Foundation.
- Done by the Foundation.

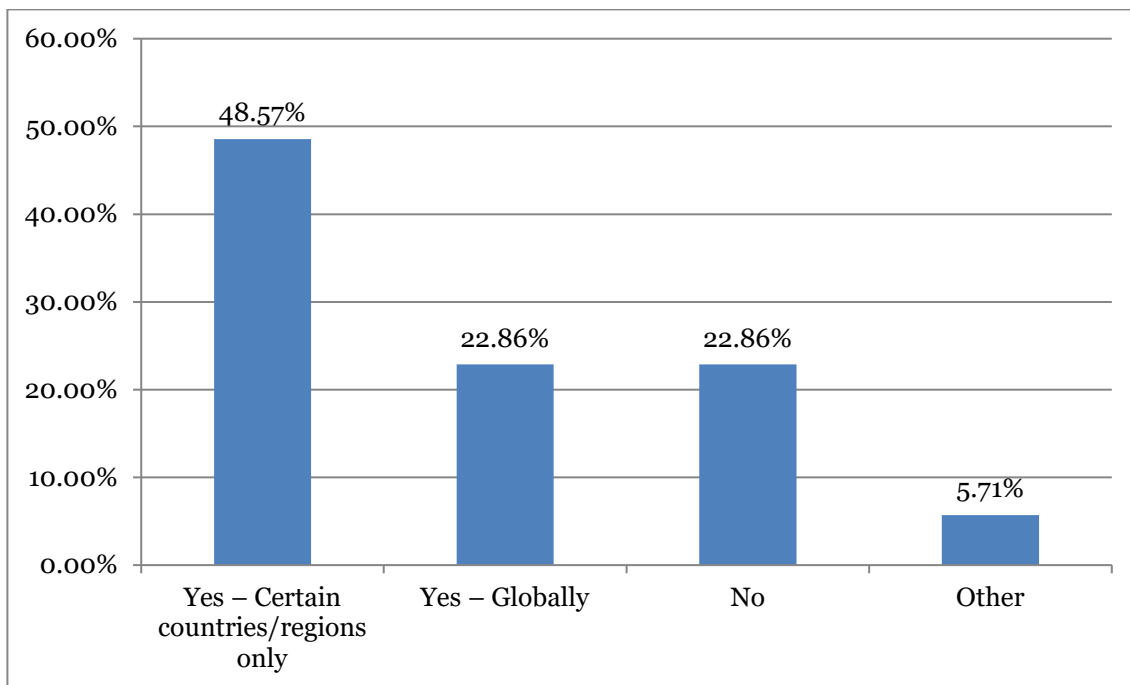
20. With respect to Third-Party Educational Conference requests for educational grants, what documentation do you require to support the educational grant?

Responses:

- Organization Legal Name; Tax ID Number; Mission Statement; Address; Website URL; Organization Type; Tax/Non-profit status and documentation; Contact info; Latin America-specific documents; Education program description, objectives, audience, support requested (financial/equipment); Dates, agenda, budget, location; Letter of Request; Sample marketing materials.
- Whether the Grant is at the request of an HCP or Public Official; information about the HCP or Public Official; purpose of the Grant; description of the funded activity; amount requested and itemized budget; event revenue sources; accreditation; verification of charitable nature (if applicable).
- Detailed information in English, with a minimum of: name/address of program sponsor/third-party payee; authorized signatory details; scientific rationale; description of attendees; detailed agenda; itemized budget with pro-rata breakdown; tax documents; ACH deposit info; COI disclosures.
- Generally speaking, same/similar requirements apply for international and US grants: Letter of Request, portal submission with: requestor name/contact, type of request/support, content & faculty, budget, venue, agenda, co-sponsors (US only), use of funds, target audience.
- Application letter with overview and justification; amount/type of support; educational program; detailed budget; description of proposed recipient, legal status and structure.
- Preliminary program brochures, promo materials, agenda, or marketing; detailed budget incl. all expenses and revenue sources; CME or equivalent accreditation; Tax ID documents.
- A written request detailing event type and purpose; proposed agenda/subject, date/time/duration/location; proposed budget; foundation name and status (non-profit).
- Ensure funds are within FMV; confirm venue isn't entertainment-focused; agenda supports education and aligns with business/strategy; gaps don't dilute value.
- Educational grants: Letter of Request, agenda, course budget, target audience; accreditation (if applicable); nonprofit/tax info.
- Agenda, Organizational Purpose/Mission, Event Budget, Attendee Types, Published Support Options, Diligence on Organization.
- Grant Request/Documentation – Letter of Request, Agenda, Budget, Purpose of Funds, W9, LOA Agreement signed before event.
- Letter of request using org letterhead, event agenda or curriculum, line-item budget incl. other sources of funding.
- Agenda, W9, prospectus, accreditation info (if applicable), grant utilization, signed agreement if approved.
- Letter of Request, program brochure/goals/objectives, W-8 BEN/W-9, IRS Tax-Exempt Letter, detailed budget.
- Detailed agenda, budget for event and grant fund allocation, Letter of Request, full application.
- Applicants must submit application, agenda, budget, tax doc, LOA, and any related documents.
- There is an application + relevant event documents like agendas, etc. must be provided.
- Grant application, program agenda, budget, beneficiary info, payment/tax info.

- LOA, prospectus, agenda, faculty, budget, entity status, CME provision, etc.
- Detailed agenda, accreditation, organization's tax form, signed agreement.
- Budget, W-9, request letter, educational need analysis, any past funding.
- Application, agenda, budget, signed agreement before fund disposition.
- Purpose statement, proposals, agendas, itemized budget etc.
- Agenda, brochure, scope, and internal support (non-sales).
- Generally, require an agenda or brochure with event detail.
- Grant application, conference description, agenda, etc.
- Agenda, request letter meeting AdvaMed standards.
- Agenda, written request from organization.
- Misc. agenda documentation, prospectus.
- Relevant tax forms, agendas, etc.
- Request letter, agenda, and budget.
- Agenda, content, location.

21. Does your company have an end-to-end system (e.g., tools) to manage Educational Grants, including request submission and review? (Please explain in the Comments)

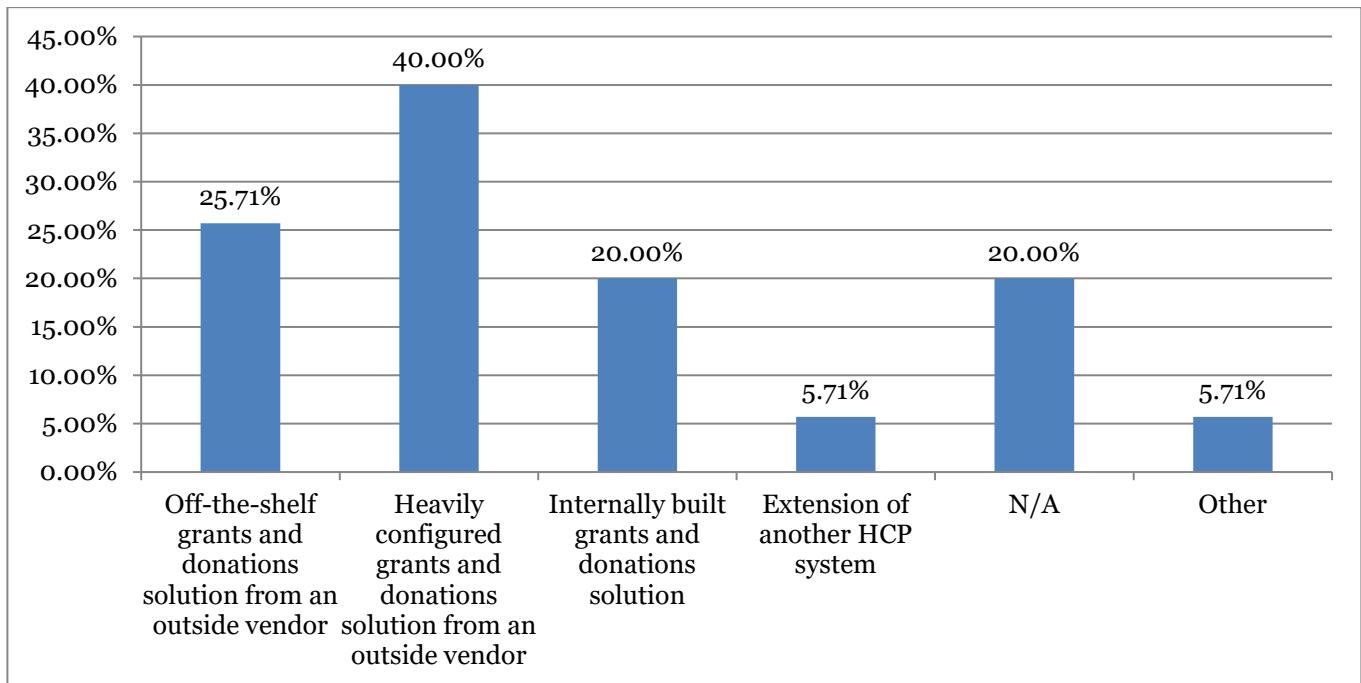


Comments:

- We have a system that accommodates grant submission and review, but have not yet deployed that functionality.
- We are currently working on the implementation of a tool to manage Education Grants end-to-end.
- AMER we have file maker pro database solution and EMEA and APAC use excel.

- As mentioned above we manage Grant requests and approvals via Sales Force.
- We have a grants link on the external website for request submissions.
- We are implementing a global system now (MedComply).
- Process built, rolling out globally.
- In the US we use a grant platform.
- Certain countries/regions only.

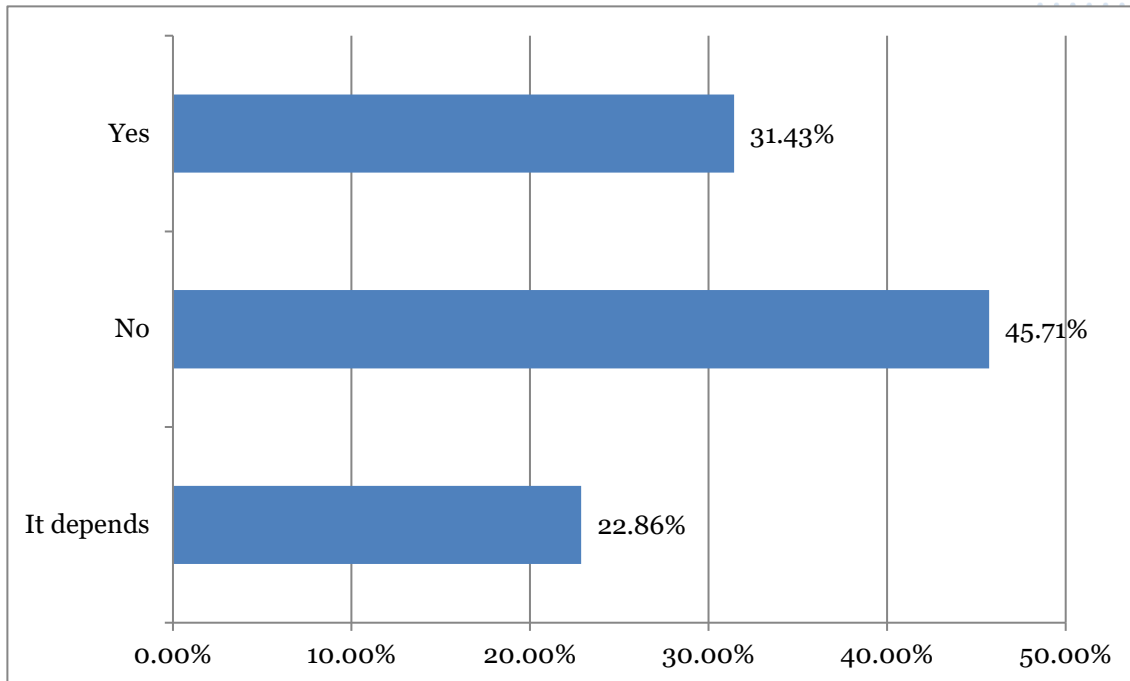
22. If you answered “Yes” to the previous question, what type of system(s) do you use? (Please Select all that Apply and Provide Feedback on any Specific Tools in the Comments) (if you answered “No” to the previous question, please select “N/A”)



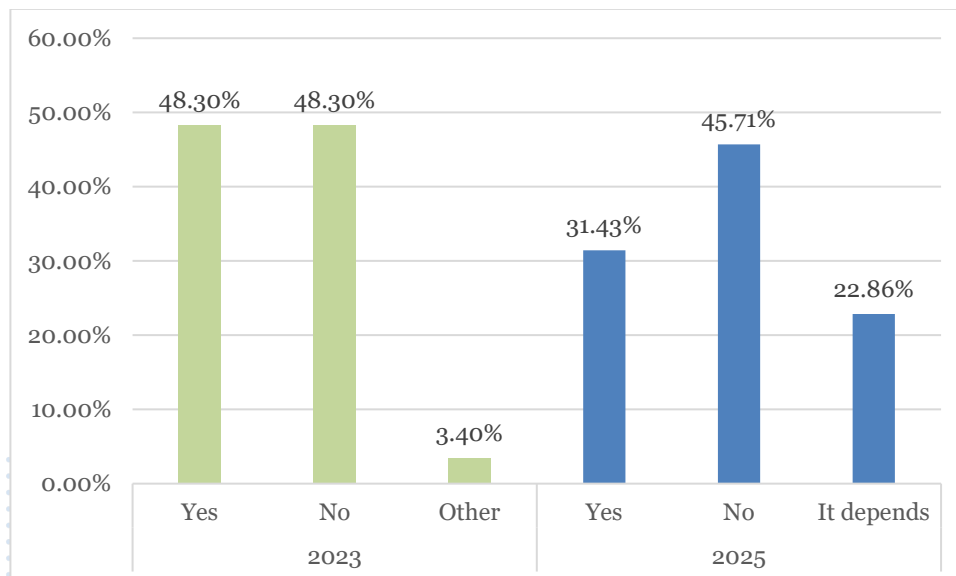
Comments:

- MedCompli serves as the repository for all submitted grant requests. Our ballot is managed through Microsoft Forms, allowing the Financial Grant Committee to review summaries of the submitted grants each month. Within this system, the committee can approve or deny grant requests. SAP functions as our payment processing system—once a grant is approved, the payment is entered into SAP and forwarded to accounting for processing.
- Utilize MedCompli for HCP Consultant management and it includes other features, including a customizable external grants portal.
- Both configured and off the shelf as the module was created specifically for our grants process.
- As mentioned above we manage Grant requests and approvals via Salesforce.
- Mostly off-the-shelf; configured to our needs, but not customized.
- Moderately configured extension of Salesforce.
- The regions use different types of systems.
- Homegrown system is powered by Salesforce

23. With respect to Third-Party Educational Conference requests for educational grants, do you require a budget reconciliation or accounting from the entity after the event? (Please Explain in the Comments)



2023 to 2025 Comparison Chart



Comments:

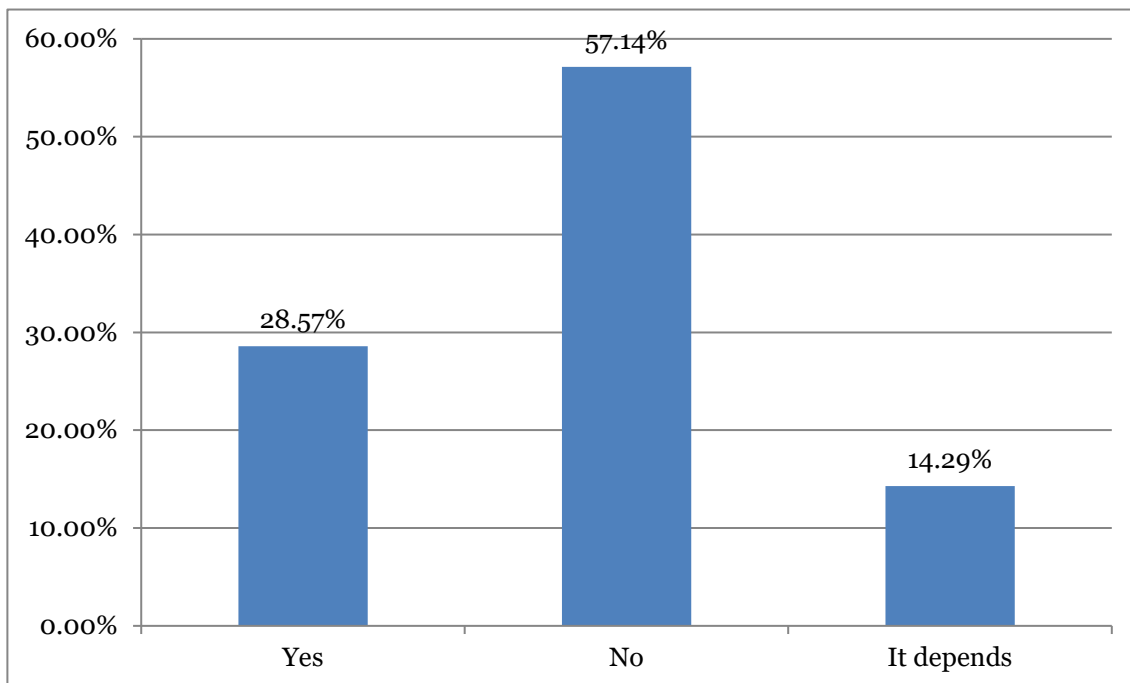
- While we do not globally require it, many regions request a fund utilization report to support how the funds were used, however, we find it challenging to require it / obtain it widely. We do

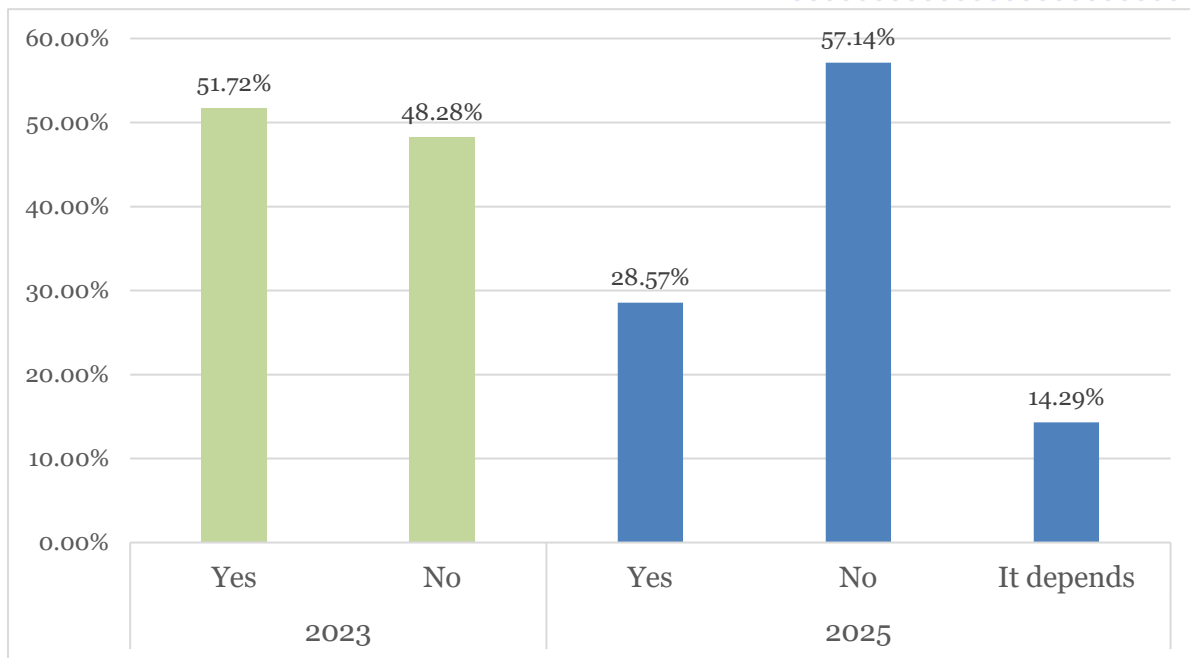


have contractual language that suggests the recipient must provide upon request. During audits where review of educational grants are in scope, we may request supporting documentation as part of sampling.

- Budget reconciliation is required for fellowship funding requests and clinical research grants, but not educational grants.
- This is built into the agreement as an option to audit after the event.
- We rarely support at a level where budget reconciliation is needed.
- Depending on the amount and specific use of funds.
- Reconciliation for grants over a certain threshold.
- Required under our educational grant agreement.
- We require a grant usage report.

24. With respect to hospital/training institution requests for educational grants, do you require a budget reconciliation or accounting from the entity after the event? (Please Explain in the Comments)



2023 to 2025 Comparison Chart**Comments:**

- While we do not globally require it, many regions request a fund utilization report to support how the funds were used, however, we find it challenging to require it / obtain it widely. We do have contractual language that suggests the recipient must provide upon request. During audits where review of educational grants is in scope, we may request supporting documentation as part of sampling.
- Depending on the amount, specific use of funds, and whether in-person support was present.
- This is built into the agreement as an option to audit after the event.
- Specific dollar amount.

25. If you responded “Yes” to the previous question, does your company collect unused funds? (If you answered “No” to the previous question, please answer “N/A” below)

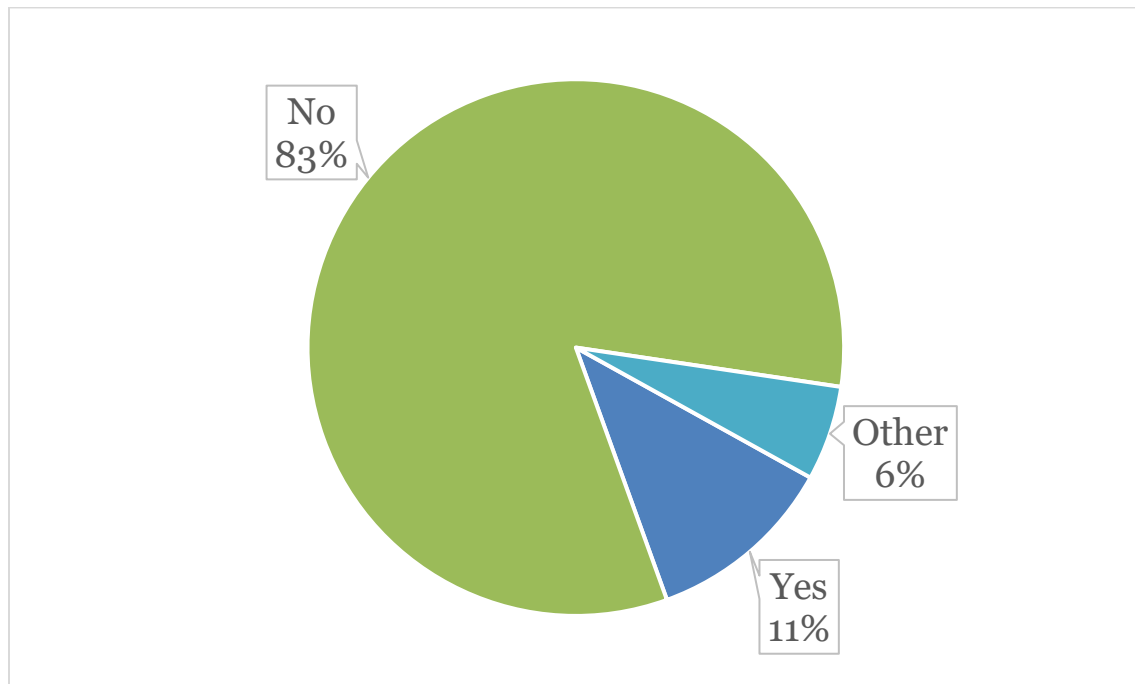
Responses:

13 respondents noted that unused funds are collected. Some additional details below:

- Internationally, the policy is that the grant recipients are required to either return unused funds or provide an explanation about how they intend to use unused funds for a future event, but this is difficult to administer.
- Yes. Each Grant request must include a description of the Grant purpose and a budget that sets forth how the funding will be used. Unused funds should be returned.
- If an audit was completed and there were unused funds, we would collect.
- Funds are generally used, but we will take any unused funds back.
- Yes, we do require that unused funds be returned.

- Yes, if over a certain dollar value.
- Yes, we will collect unused funds.
- Reconciliation report should include details such as: Actual revenue generated from registration, grants, exhibits/sponsorships, and other sources. Actual funding from all other supporters, excluding the company. Actual program expenses. Actual expenses funded by the company. Amount due back to our Company, if applicable. Final budget, if applicable.
- Actual program expenses.

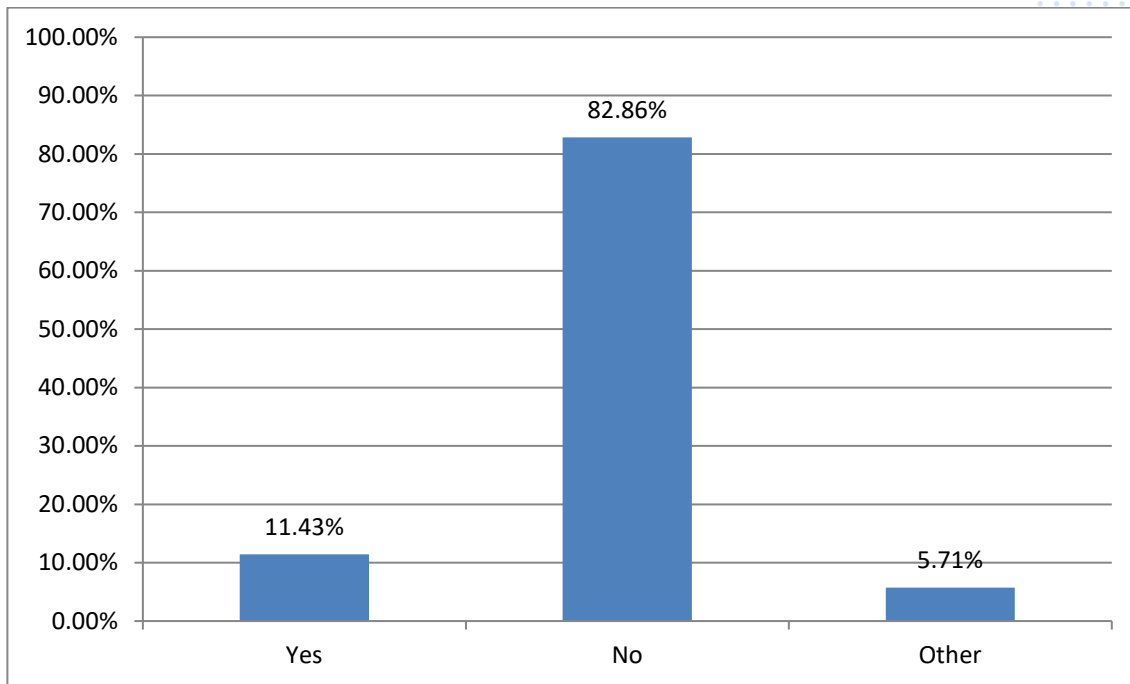
26. When a Third-Party Educational Grant is approved, does your company permit sales personnel to directly execute payment for any associated expenses (e.g., meeting space fees)?



Comments:

- Grants & Donations Committee has its cost center and annual budget.
- Sales cannot be involved in any part of the grants process except to support the setting up of in-kind equipment for approved grants with in-kind requests.
- Only Exhibits can be paid for directly by sales personnel.
- This is usually an either/or situation and not generally both.
- Grants and Sponsorship/Exhibits are treated separately.
- Exhibit Booth.

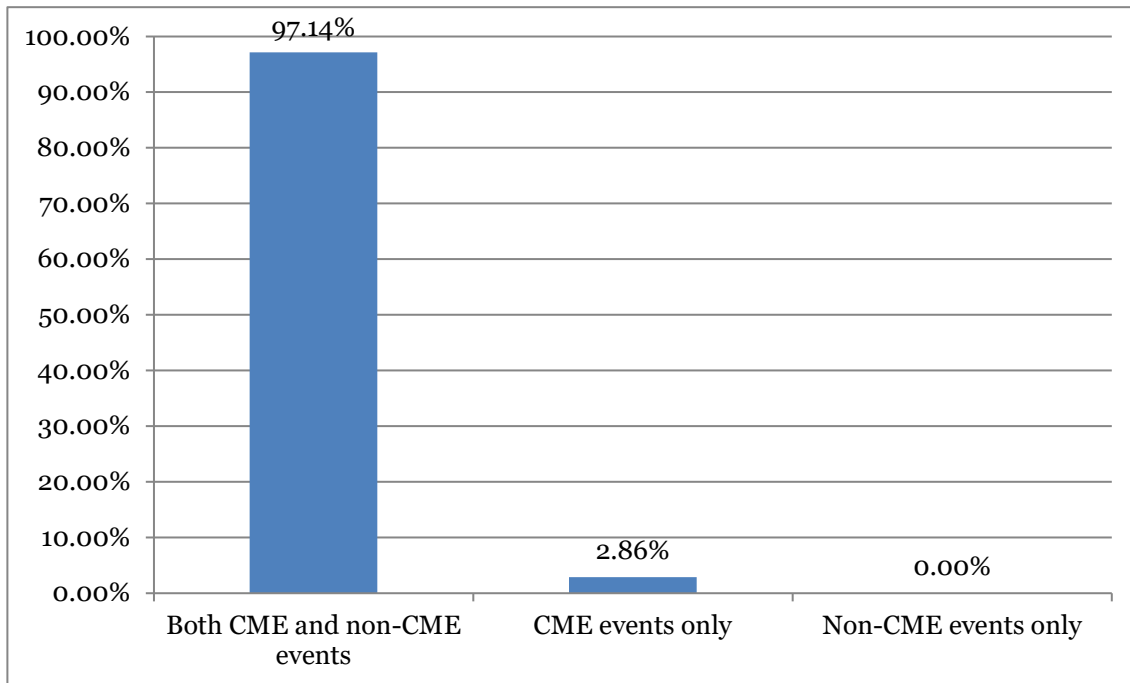
27. When a Charitable Contribution is approved, does your company permit sales personnel to directly execute payment for any associated expenses (e.g., gala or other event tickets)?



Comments:

- Only approved legitimate fundraising events in very limited occasions when the payment must be done via credit card.
- Grants & Donations Committee has its own cost center and annual budget.
- Payments go through the centralized AP process.
- We don't allow Charitable contributions.

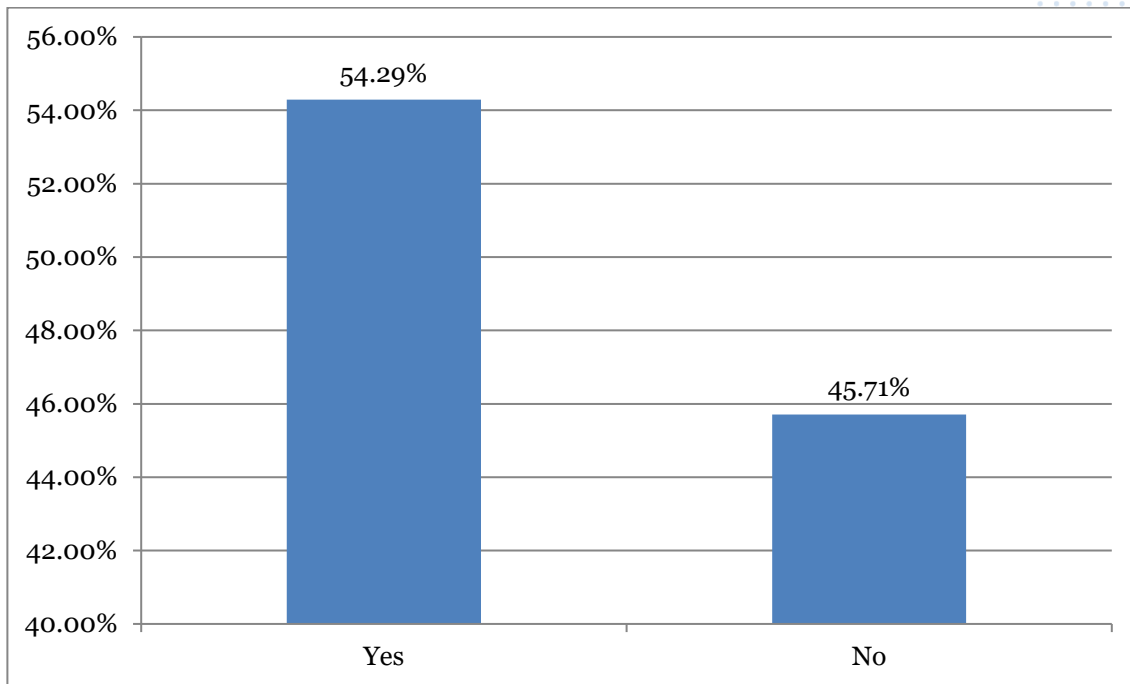
28. Does your company support educational grants for Continuing Medical Education (CME) and non-CME events?



Comments:

- The company conducts training and education for HCPs to support the safe and effective use of our products. Training may be provided to HCPs through medical education events, such as cadaver labs, surgery observations and product training courses. In addition to technical instruction, medical education may cover disease states and treatment options, patient selection criteria, clinical treatment standards and outcomes, care pathways and other important topics.
- Again, it depends on the country and who the CME benefits. For some markets and some kinds of providers (Nurses, etc.).
- The vast majority is CME only.
- Varies by region/country.

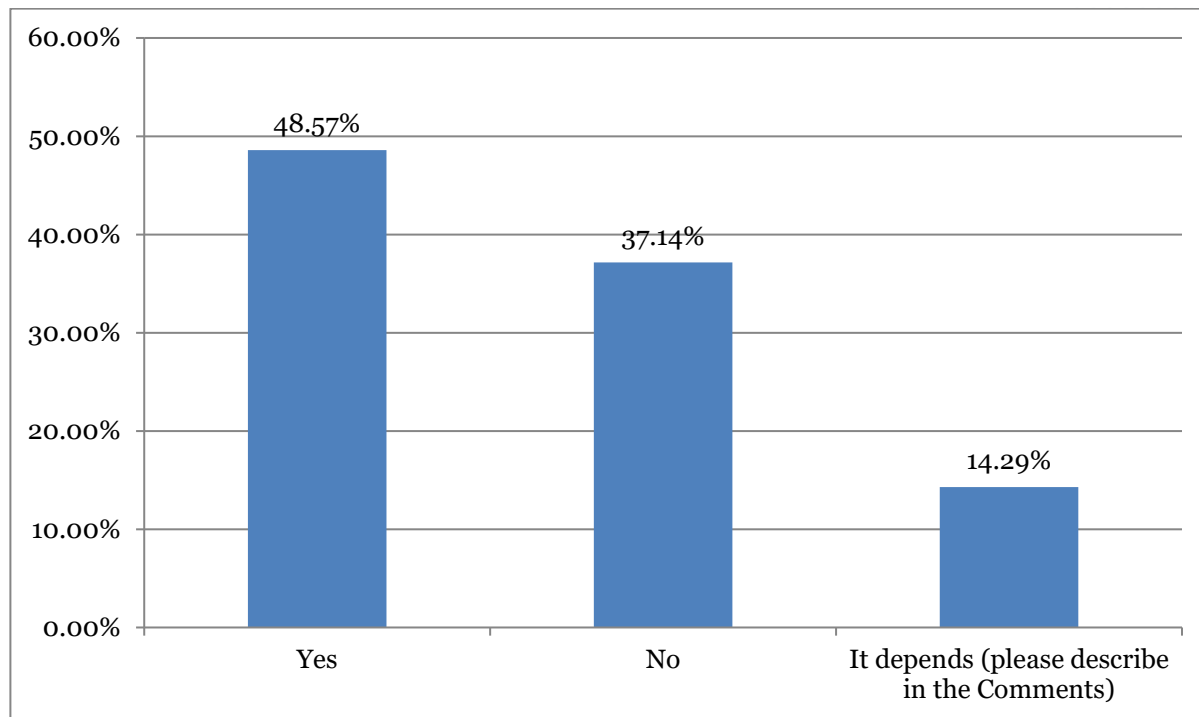
29. Does your company directly conduct educational programs that provide continuing education credit (CME or other continuing education credit (e.g., nurses))?



Comments:

- Yes, we conduct educational programs that offer accredited Continuing Education Units to non-physician HCPs and report as appropriate.
- Currently our company is drafting guidance regarding programs where this applies and mechanisms for identifying when a company program that gives CE credits may result in reporting.
- In EMEA certain medical education courses organized by our company are eligible for CME. Within the US we don't provide CME credit for courses.
- In the US, not for physicians, but for nurses. In other countries/regions as permitted by law and relevant bodies.
- We support this in rare circumstances, and they are considered an exception to current policy.
- Our policy requires all company-provided CE courses to be offered at FMV rates.
- It depends on the market and type of CE being provided.
- Non-CME - nurses, scrub techs etc.
- CE programs, but not CME programs.
- Varies by region/country.
- Based on regional codes.

30. Does your company provide educational grants to hospitals or other training institutions to support their physicians in-training (e.g., fellows, residents) attendance at a Third-Party Educational Conference?

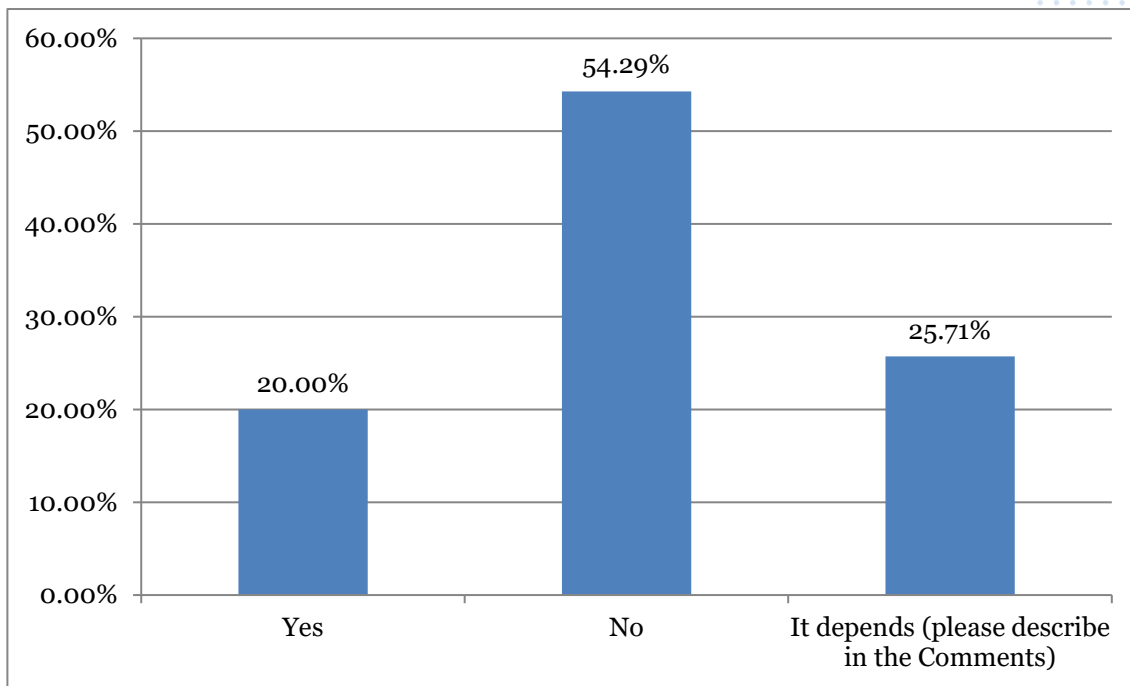


Comments:

- Our company may provide educational grants to hospitals and other training institutions to support physicians in training, such as fellows and residents, in attending Third-Party Educational Conferences. These grants are awarded directly to the institution, not individual HCPs, and are intended to support legitimate educational activities. The institution is responsible for selecting the recipients based on predefined criteria, ensuring compliance with industry regulations and company policies. Funding is provided in alignment with fair market value considerations.
- In the US, Requests like this would typically be made by educational conference organizations for the company to support a fund that would be used for fellow/resident attendance, but the company would not be involved in the selection of which HCPs would receive the support. Requests for this type of funding would get additional scrutiny if it was made by a customer. Internationally, requests like this could be made by hospitals or other training institutions and our company is not involved in the selection of which HCPs would receive support.
- We prefer to provide scholarship funding directly to the third party or a professional society to offset residence and fellows attendance fees.
- Grant funds may be given to support an HCP-in-training's attendance at a Third-Party Program if the HCP-in-training is independently selected by their academic institution or the Third-Party Program Organizer and not by the company.
- We usually provide only product and training via internal personnel for this purpose.
- We only provide the funding to the conference provider and never to a specific HCO.

- We do not do this in the Americas region but may do so in other regions.
- We would give money to the event organizer, who would select attendees.
- Rarely, but in some markets and circumstances.
- With strict requirements.

31. Does your company provide educational grants to hospitals or other training institutions to support their physicians (e.g., attending physicians) attendance at a Third-Party Educational Conference?

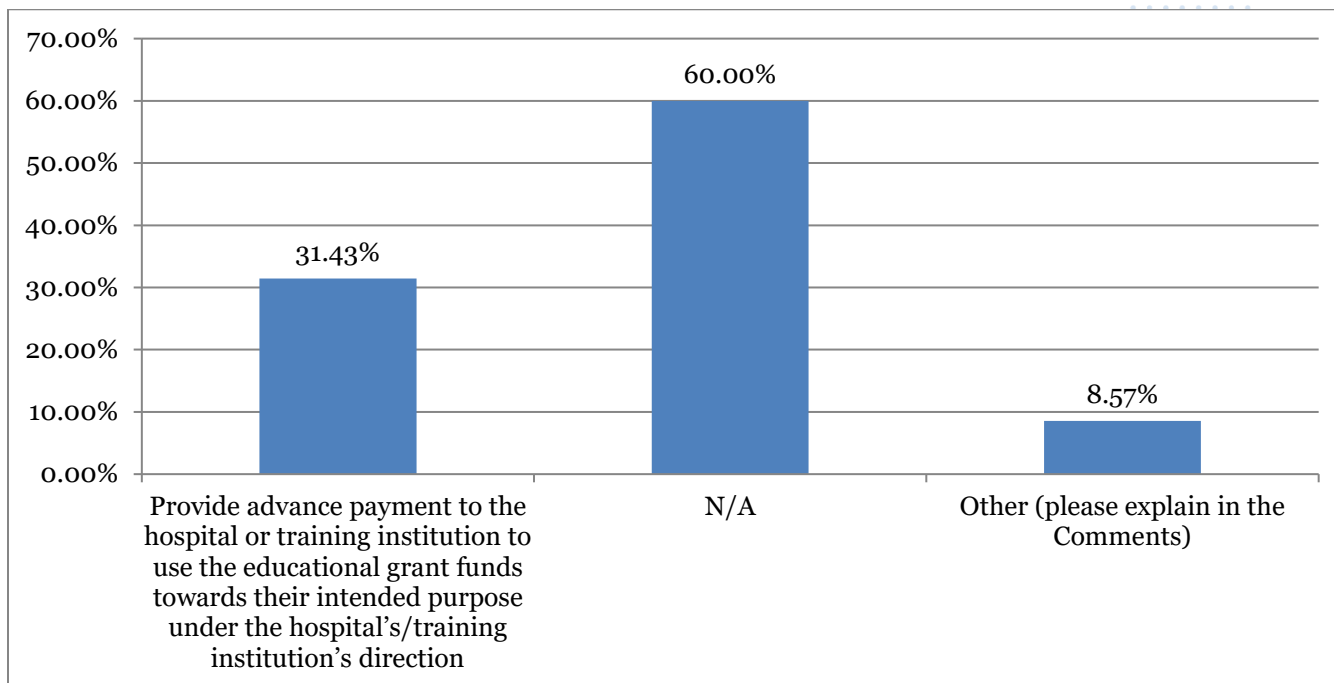


Comments:

- Our company may provide educational grants to hospitals and other training institutions to support physicians in training, such as fellows and residents, in attending Third-Party Educational Conferences. These grants are awarded directly to the institution, not individual HCPs, and are intended to support legitimate educational activities. The institution is responsible for selecting the recipients based on predefined criteria, ensuring compliance with industry regulations and company policies. Funding is provided in alignment with fair market value considerations.
- Most often provided as one part of funding the residency/fellowship program more broadly (as in, general funding provided for a variety of areas like salary support, grand rounds, travel to conferences, etc).
- We provide grants to support physician attendance at third party conferences indirectly in our international markets. This may be to a hospital, hospital network or to a professional society of HCPs.
- Not in the USA.
- Not approved as a grant but we approve sponsorships internationally where the funding is used to support the institutions physicians.
- We only provide the funding to the conference provider and never to a specific HCO.

- We don't do this in the US/CAN. It's only available for those "in-training".
- We may provide a Grant if the physician is speaking on our behalf.
- Depends on local code permitted for a specific program and agenda.
- In certain markets, this is allowed to support public health.
- Based on trade association code.
- We do not support staff-only training.

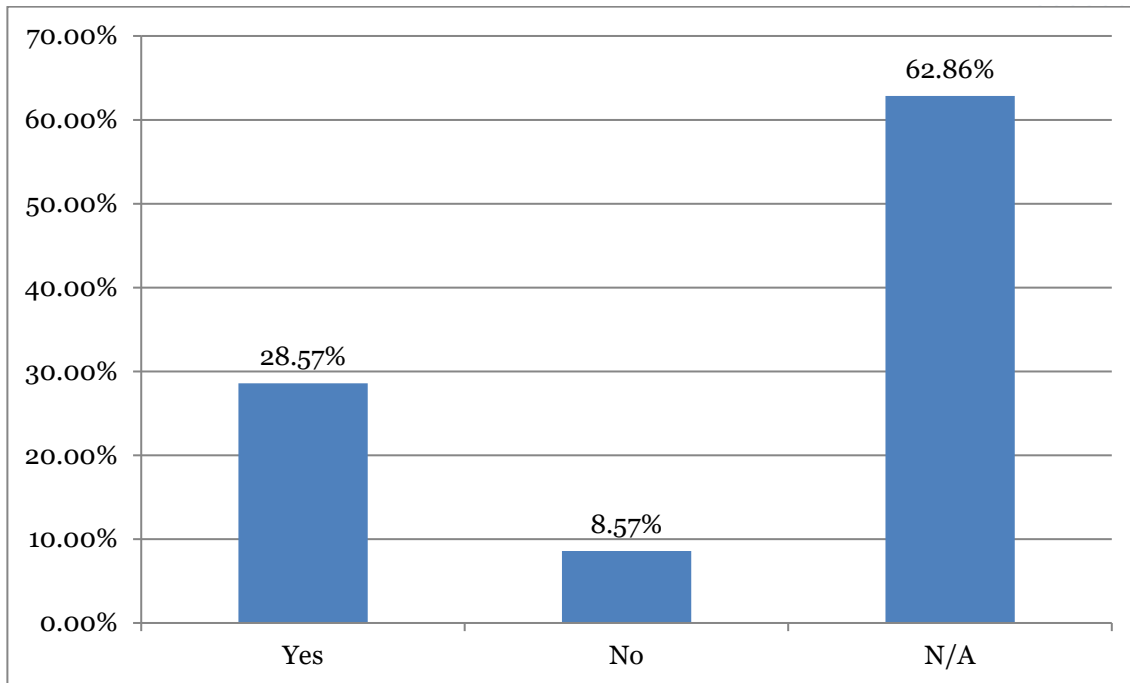
32. If you responded “Yes” to the previous question, do you:



Comments:

- We provide indirect sponsorship in response to concrete requests from the hospital or training institution, ensuring that the Third Party Educational Conference meets the requirements of a legitimate educational conference.
- Funding provided to third party, not to hospital or training institution directly.
- We pay the organizer directly.

33. If you indicated in your response to the previous question that you provide advance payment, do you base the amount of the advance grant funding on the estimated fair market value of the costs that the grant will cover? (Please explain in the Comments)



Comments:

- Based on the language in the letter of agreement, if a surplus of funds is available after an event, the applicant is to return the funds.
- Yes. Generally, any education grant funding is expected to be fair market value, reasonable, and documented.

34. If you responded “Yes” to the previous question, what is the general methodology you use for determining fair market value (e.g., data sources, type of event, etc.)? (If you answered “No” to the previous question, please answer “N/A” below)

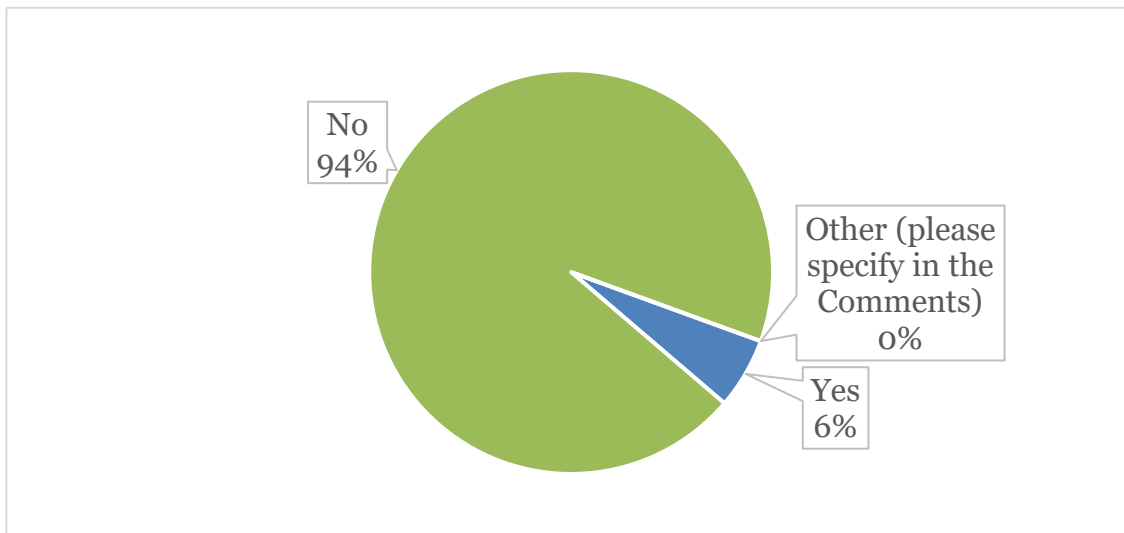
Responses:

- Internationally, our compliance teams may verify conference registration costs, may generate estimated flight and hotel costs to verify the budgeted amounts being provided for HCP travel and logistics. Relating to overhead for processing the grant, we require that administrative fees over 15% require additional explanation and receive escalated review and approval.
- We consider factors such as the type and duration of the event, geographic location, and typical costs associated with similar educational conferences. Additionally, we review comparable funding levels from past grants and industry standards to ensure alignment with regulatory expectations and internal compliance policies.
- Registration is a known cost. Grant committee experience determines reasonableness of travel, accommodation and meal expenses.
- Each Grant request must include a description of the Grant purpose and a budget that sets forth

how the funding will be used.

- As outlined per the third party based on budget request per travel needs, registration fee and Healthcare Professional count.
- Compare with published requests, similar events and past requests, and costs of internal events of similar size and nature.
- Base rates for attendance and accommodations in accordance with T&E policy.
- Experience on venue/travel/total event cost from own educational events.
- We use a third party to determine FMV.
- External FMV from third-parties.

35. With respect to hospital/training institution requests for educational grants, does your company actively solicit requests for educational grants from these entities?



Comments:

- For the US: For educational grants, hospitals, and training institutions, know that our company has a grant program, and our submission process is available on our website. We do not approach third parties to ask them to submit a request. Also, we direct our employees that, if they are approached by a customer about a potential grant submission, they should refer to the customer to the company's grant portal. In our international markets, our company generally does not approach third parties to ask them to submit a request, however, commercial teams in some regions are likely to discuss grant opportunities with hospitals/ training institutions, although our policies state that the grant review process must be separate from the commercial interests of the company.
- We have done this, but only in very rare occasions.
- Only in some countries through grant agencies.

36. With respect to hospital/training institution requests for educational grants, what documentation do you require to support the educational grant?

Responses:

- A preliminary copy of any program or event brochures, promotional materials, agenda or related marketing and communication pieces, as applicable. A detailed budget that includes all expenses and any potential income/revenue from items such as exhibit fees, registration fees, marketing sponsorships, and other grants. Information about Continuing Medical Education (CME) or equivalent accreditation, if applicable. Tax ID Documents.
- Ensure grant recipients use funds within FMV parameters. Confirm venue is appropriate and doesn't revolve around entertainment or recreational activities. Ensure the agenda and topics support educational purpose related to company business and strategies, consider how any gaps in programming may dilute the educational impact.
- With respect to educational Grant requests, organizations must disclose: (1) whether attendees will be charged tuition or other fees in relation to the educational program or event; (2) the amount of the tuition or attendance fee; and (3) the projected net profit from the program or event, if applicable.
- A Letter of Request on the Applicant's letterhead - The program brochure/explanation of objectives/goals and selection criteria (as applicable). -W-8 BEN/W-9. - IRS Tax-Exemption Determination Letter (if applicable) - Detailed Budget to support requested funding amount.
- A written request detailing the type and purpose of the event; a proposed agenda/subject matter, date, anticipated time, duration and location of the event, a proposed budget; and the foundation's name and status (i.e. non-profit).
- For educational grants to hospitals/training institutions, we request a letter of request, an agenda for the specific event, a course budget, and identification of the target audience.
- Grant Request/Documentation – This usually consists of a Letter of Request from the Organization, Agenda, Budget, Purpose of Funds, W9, LOA Agreement signed prior to event.
- There is an application that must be submitted with relevant details of the conference, and any other applicable documents, such as agendas, etc., must be provided.
- completed grant application, program agenda, budget, details related to the benefitting organization, and relevant payment/tax information.
- Agenda, W9, prospectus, accreditation info (if applicable) how grant will be utilized, etc. and an agreement if approved.
- Explanation of the need; Listing of types of attendees, commitment around utilization of in-kind product donations.
- Description of event, faculty, demonstrated need, quality of educational content, relevance to the disease state.
- Generally, we require an agenda or brochure of the event with as much detail as possible.
- Detailed agenda, letter of request, fully completed grants application, and budget.
- Request, Tax documents, 501 c(3) if applicable and written contract.
- Same documentation is required for all educational grant requests.
- Tax and financial information; intent on how funds will be used.
- We require documentation such as full agenda, budget and venue.
- Purpose statement, proposals, agendas, itemized budget etc.

- Our grants portal sets out the requirements for submissions.
- Application, budget, agenda, and contract signed if approved
- Same as any other grant requestor.
- What is the purpose, budget, etc.
- Request letter, agenda, budget.
- Request letter, agenda, and budget.
- Agenda, written request.
- 4 respondents noted the documentation is the same documentation as for third-party educational conference requests for educational grants.

37. If a budget for an educational grant is provided that includes entertainment, how do you address?

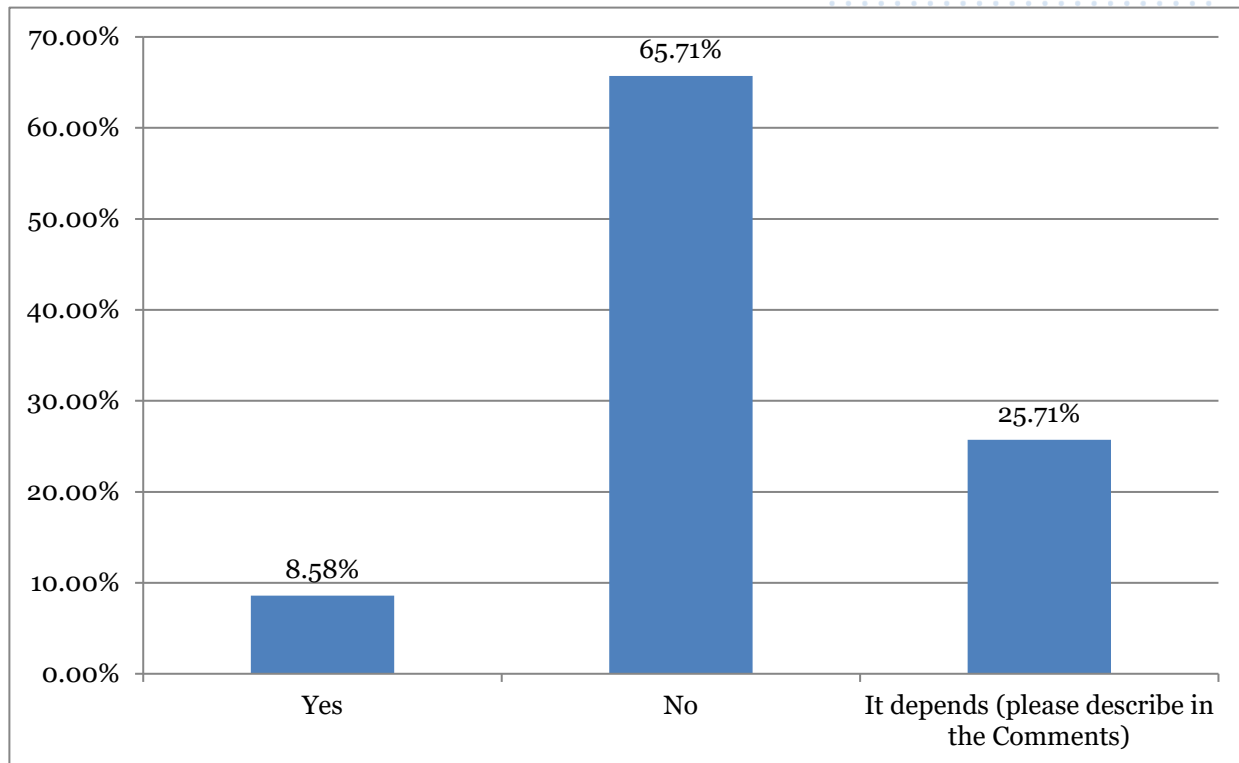
Responses:

- Educational grants may be provided for third-party programs at resorts if the primary purpose of the program is educational. The company does not pay for HCPs to participate in recreational activities or provide meals or beverages during recreational events.
- We either state that our funds cannot go towards entertainment or decline the request as we don't allow Educational Grants for events that contain entertainment as part of their agenda and the entertainment is covered by the registration fee.
- We either deny the request, ask further questions to determine if the entertainment is paid for by attendees, or in limited situations, specify that our funding may not be used for entertainment.
- Entertainment would likely result in a denial; if de-minimis and depending on the nature, we would require written confirmation that our funds would not be used for the cost of the entertainment.
- It is expected that our company's funding would not be used to directly support entertainment for attendees at third-party programs. If a program were entirely entertainment, it would not get funding. However, in instances where entertainment is a minor part of an agenda and our company is providing a relatively small percentage of the overall support for a much larger program that had bona fide educational content, we would still provide funding to the third-party organization.
- Address directly via written communication with requesting organization that funding can only be used for the educational program and cannot be used for entertainment or recreation.
- If the budget includes entertainment, we assess whether this entertainment excludes our support and ensure in writing that our contribution is not used for facilitating entertainment.
- We decline to participate, reduce amount considered, and confirm (in writing) that any grant funds cannot support entertainment, food or beverage, or lodging.
- We do not support any entertainment. We would require documentation restricting our funds from being used for entertainment.
- We would not permit funds to be used for that use and would structure any agreement or funding to reflect this.
- We indicate that any grant proceeds we provide cannot be allocated or put towards the entertainment costs.
- We do not provide educational grants to fund events that include social activities or

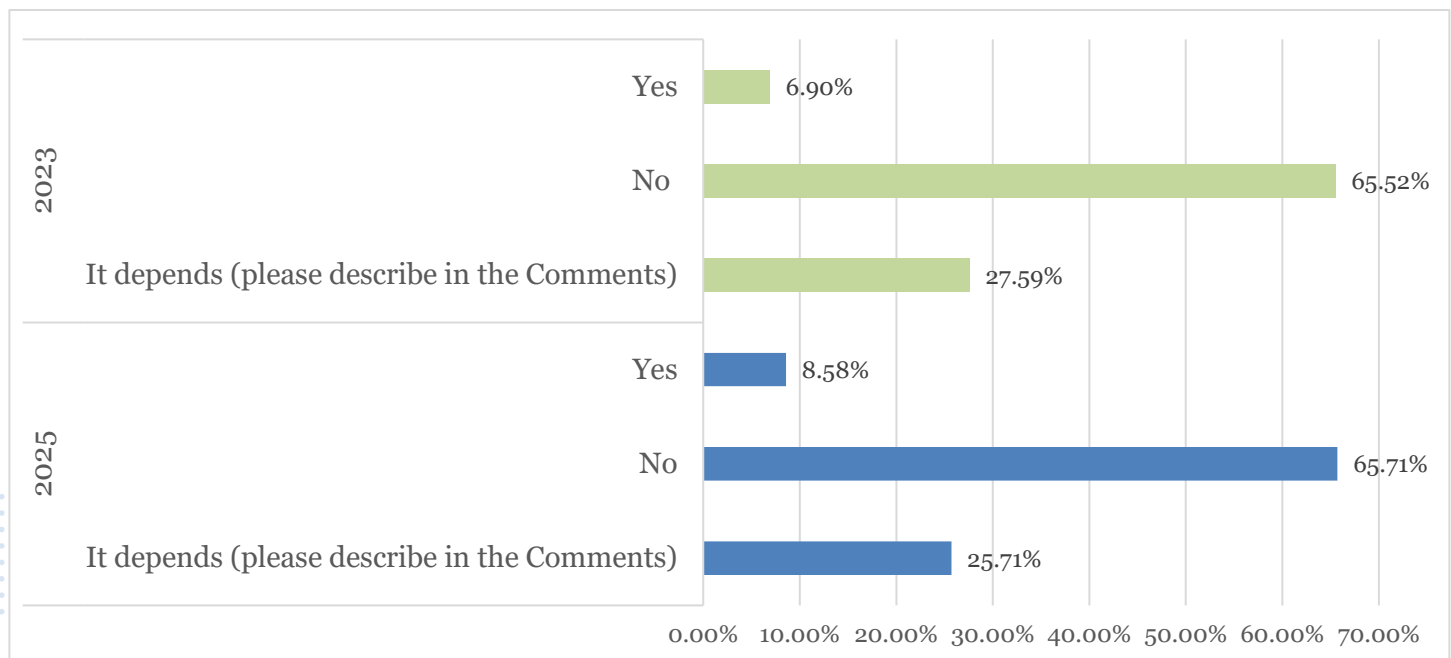
entertainment.

- Refuse to support that part of the event or refuse the event entirely if organization won't cooperate.
- We either decline the grant request or ask the requester to resubmit the grant without entertainment.
- Add limitations in the grant agreement that the grant is not allowed to be used for entertainment.
- We specify that our funds cannot be used for entertainment or be included as part of the expenses.
- We confirm our funds will not be used for entertainment and we detail that out in the agreement.
- Our contract clearly states that funds cannot be used for entertainment/recreational purposes.
- Do not support, or issue a letter informing our support cannot go towards the entertainment part.
- In the letter of agreement, we restrict funds to be used for entertainment purposes.
- We do not permit funds to be used for entertainment in an engagement/contract.
- Typically, we would request a revised budget excluding entertainment costs.
- It is likely we would not approve this unless it is small/incidental.
- Written agreement prohibiting fees to go towards entertainment.
- We don't support entertainment and outlined in their agreement.
- We would not sponsor an event that includes entertainment.
- We do not support grants for entertainment.
- We do not support entertainment.
- We don't support entertainment.
- Do not fund.
- We deny it.

38. If the HCPs who benefit from your educational grant are unknown at the time of funding, does your company expect to learn these HCPs' identities?



Comparison Chart

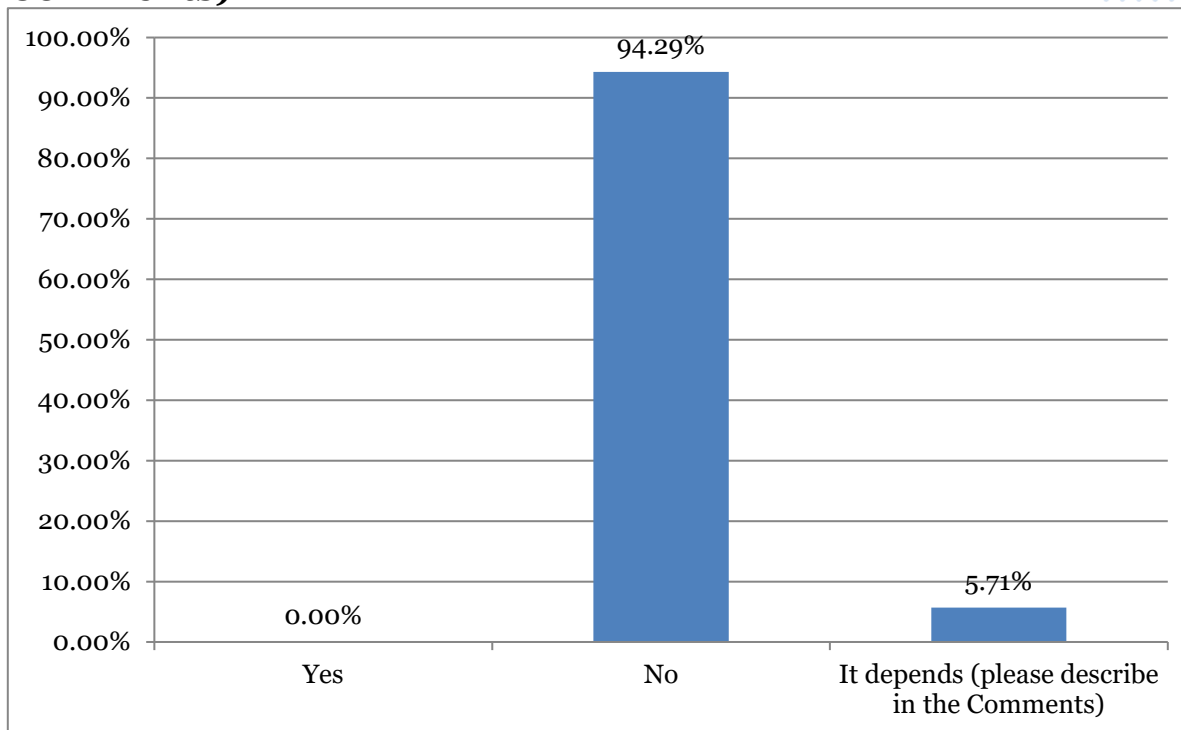


39. If you responded “Yes” to the previous question, at what point and by what means does your company become aware of the HCPs’ identities that benefitted from your company’s grant (if at all)?

Responses:

- The names of HCPs are not provided, but we do ask for the range of attendees, which includes residents, nurses, etc. That is required to be documented in our application.
- For transparency purposes we collect information and our medical education team may have visibility and follow up with the attendees.
- Not a general requirement; however, in certain countries, there is a legal requirement to report on grant beneficiaries.
- We don't request this information when awarding educational grants.
- May learn through a later audit or review of documentation.
- For Fellowship funding, the company does not obtain the names of the HCPs whose fellowship we supported. For educational grants for other types of third-party programs (conferences or hands-on training programs), we sometimes will obtain an attendance list. Internationally speaking, we do not obtain or expect to obtain a list of attendees who benefited from an educational grant.
- The company doesn't provide names of potential attendees for third-party programs, but in some instances, we will provide suggested speakers/faculty (if the third-party organization needs assistance identifying speakers/faculty).
- If the funds are used as a scholarship to attend a training/meeting, we require the institution to provide names for transparency reporting purposes.
- In-person attendance, mutual communications etc. No active efforts to determine identities.
- As part of the grant usage report.
- Usually after the event.
- It depends.

40. Do you provide a list of suggested HCPs who could potentially benefit from your company's educational grant? (Please Explain in the Comments)



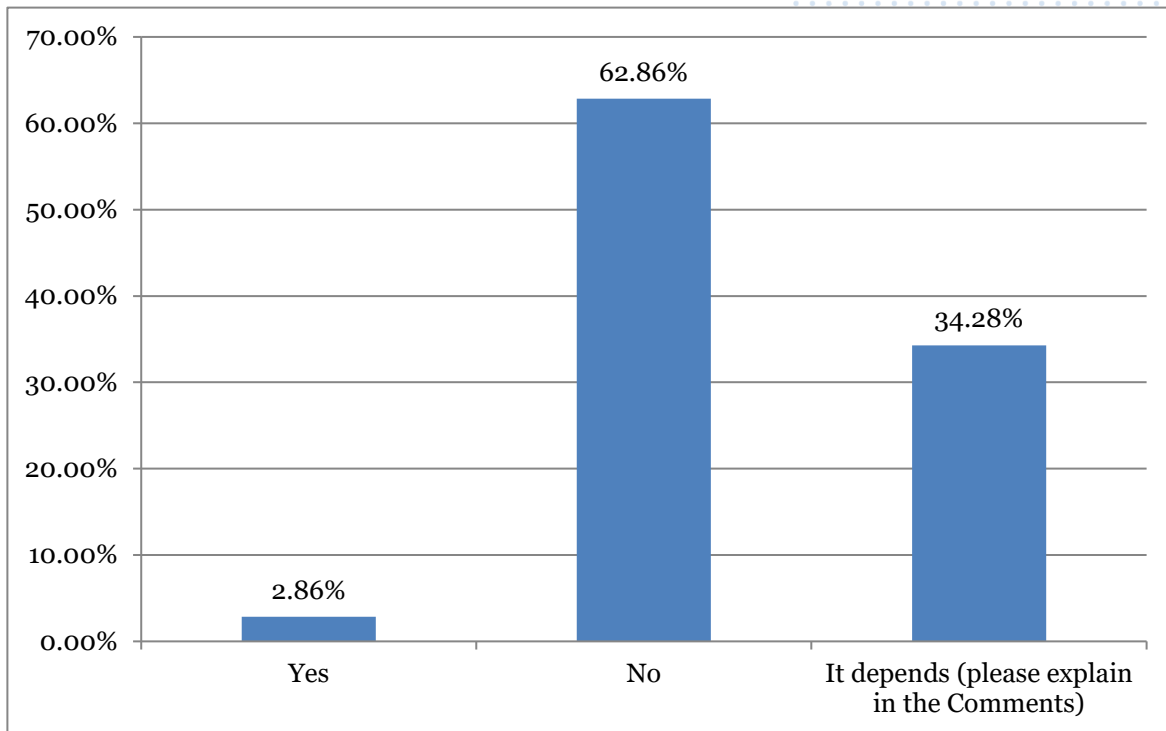
Comparison Chart

Responses	2023	2025
Yes	0%	0%
No	82.76%	94.29%
It depends	17.24%	5.71%

Comments:

- The company doesn't provide names of potential attendees for third-party programs, but in some instances, we will provide suggested speakers/faculty (if the third-party organization needs assistance identifying speakers/faculty).
- The company may not select or influence the selection of the individual HCPs who might benefit from the educational program.
- Only if requested by the Institution.

41. Does your company permit the same HCP to benefit multiple times from your company's educational grants to attend different Third-Party Educational Conferences?



Comparison Chart

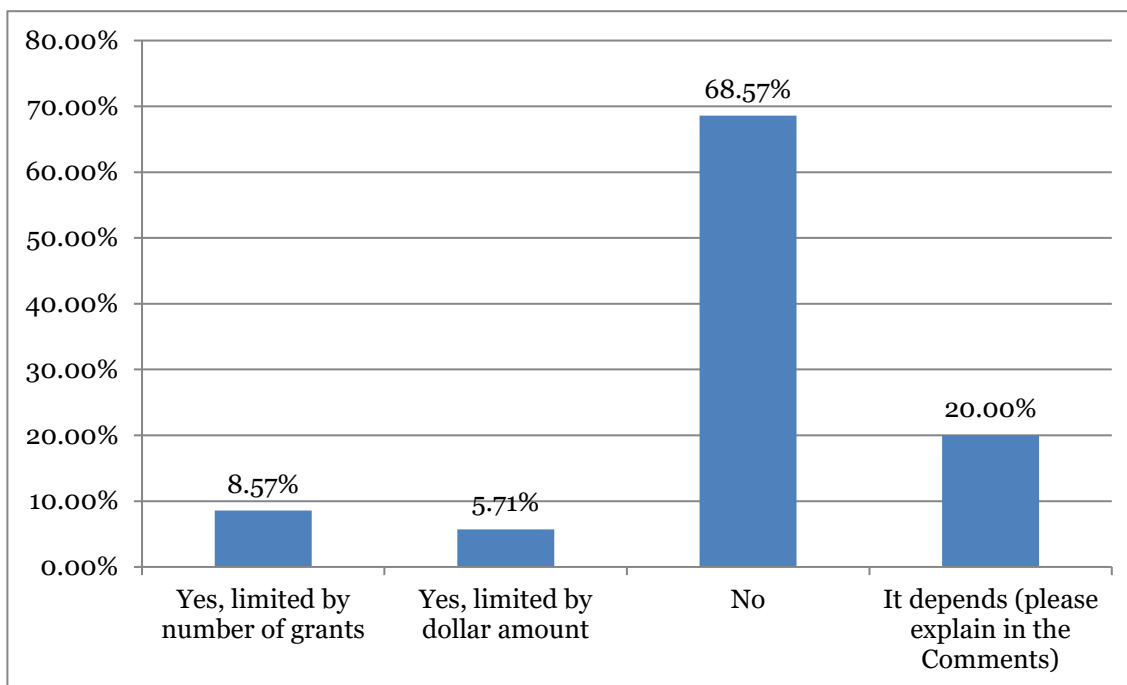
Responses	2023	2025
Yes	20.70%	2.86%
No	48.30%	62.86%
It depends	31.00%	34.28%

Comments:

- We often don't know the names of attendees in advance, and our expectation is that third-party programs often don't have the same attendees year after year (unless it is a regular conference).
- We do not ask for the list of HCP's that might benefit from an approved grant prior to the event start date. It could be that an HCP attends more than one conference throughout the year.
- We wouldn't necessarily permit this, but we do not know the individual HCPs who benefit from our educational grant funding.
- We do not know who benefits from the grants, as we do not seek their identities.
- We have a very low volume of this type of educational grant, and it would be unlikely we'd fund multiple requests.
- If we provide an educational grant to the meeting sponsor, we are blinded to the HCP beneficiary of the funds.
- We don't request this information (i.e., list of HCPs who attended third-party educational programs).

- We would not know this information, since we do not know the identities of the HCPs.
- Not in principle. Our funding goes to the institution and not the individual HCP.
- We give very few HCP attendance grants and do not fund multiples for the same HCP.
- We are not involved in the selection of HCPs that will benefit from a grant.
- We do not control who will receive the grant on an individual level.
- We give to conference organizers; don't give to individual HCPs.
- We do not know in advance the beneficiary.
- We don't know HCPs who attend.
- Depends on the type of grant and program.

42. Does your company limit the number of grants or dollar amount awarded to a particular hospital/training institution annually? (Select all that apply)



Comments:

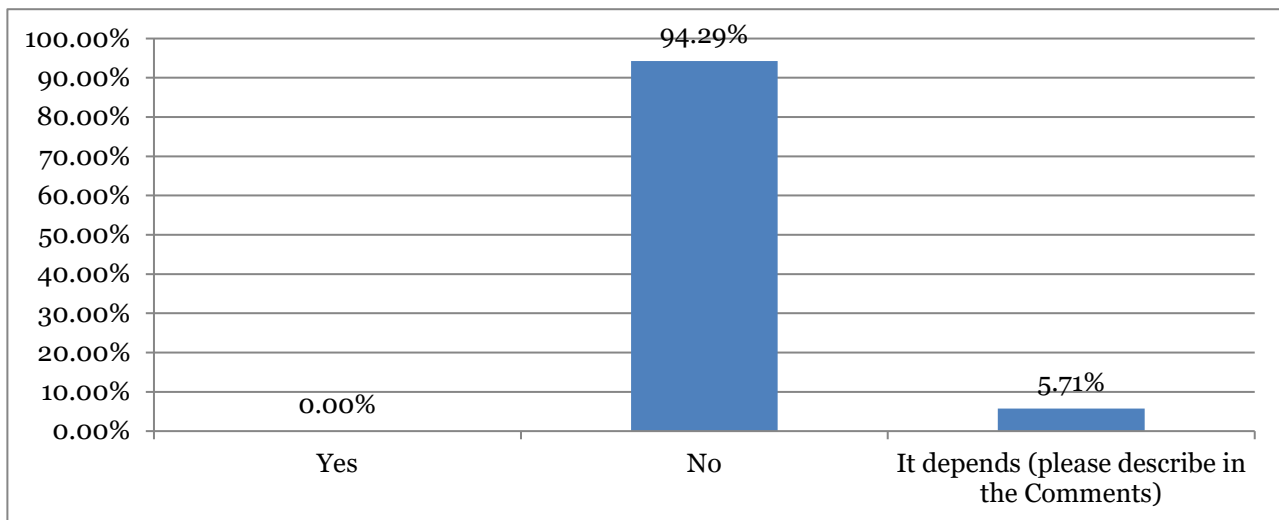
- Our policies don't cap the number of grants a particular recipient can receive nor is there a dollar threshold. As a practical matter, however, repeated grants to the same third-party (or a high-dollar grant) would be controlled by company budget and fair market value considerations.
- In the US/CAN, we do set a dollar limit for a particular institution with regards to support for "in-training" HCPs to attend conferences.
- There is no defined limit, but the number and dollar amount of approved requests per recipient are tracked and monitored.
- We monitor grants by hospital and institution, but we do not decline strictly on the number of grants awarded annually.
- We evaluate the legitimacy of the event.
- We do not give funding to HCOs directly.

43. If you responded “Yes” or “It depends” to the previous question, what is the limit on submissions /applications annually (by number and/or dollar amount)?

Responses:

- It depends on the qualifications/expertise of the institution and whether it can justify a legitimate need for a grant that aligns with the company's purpose/treatment areas.
- US/CAN: \$5,000 max per institution per calendar year to support for "in-training" HCPs to attend conferences.
- The Grant Committee considers the number and amount of approved grant requests, but has not established hard limits.
- There isn't a set amount. However, we require the amount to be reasonable in relation to the event.
- would be dependent on the limited budget and what the company was looking to support.
- We evaluate the events and if they are appropriate.
- Once per year.

44. If the Third-Party Conference Organizer selects its own HCP faculty but asks industry to directly arrange and pay for the HCP faculty travel, do you view this as permissible?



Comments:

- We will pay for the travel provided the Physician has worked with our product and there is value to the patient as a whole.
- Maybe in rare situations. We do not direct funds to HCPs directly or have knowledge or intent of who it goes to.
- Not permissible.

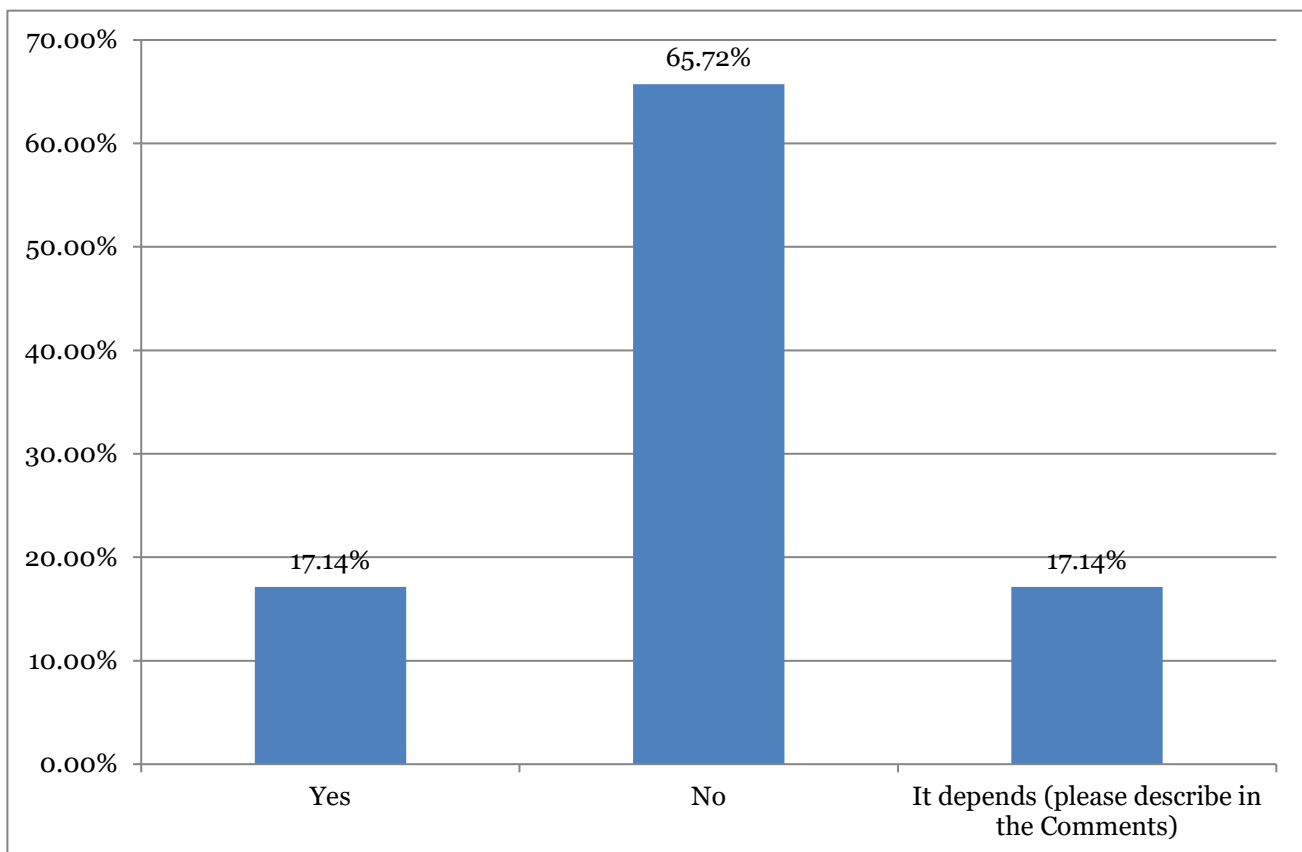


45. If you responded “Yes” to the previous question, how does your company handle the situation in which a Third-Party Educational Conference sends an invoice after the fact to industry to pay for HCP faculty travel and lodging?

Responses:

- Pursuant to our Letter of Agreement, no funds will be used to cover speaker fees/honoraria, travel, lodging or other associated expenses for Project faculty, nor would we arrange and pay for this directly.
- We require the HCP to be set up in our system as a vendor in order process any payment.
- Response was "No"

46. Do you provide a list of suggested faculty if the Third-Party Conference Organizer asks for such a list?



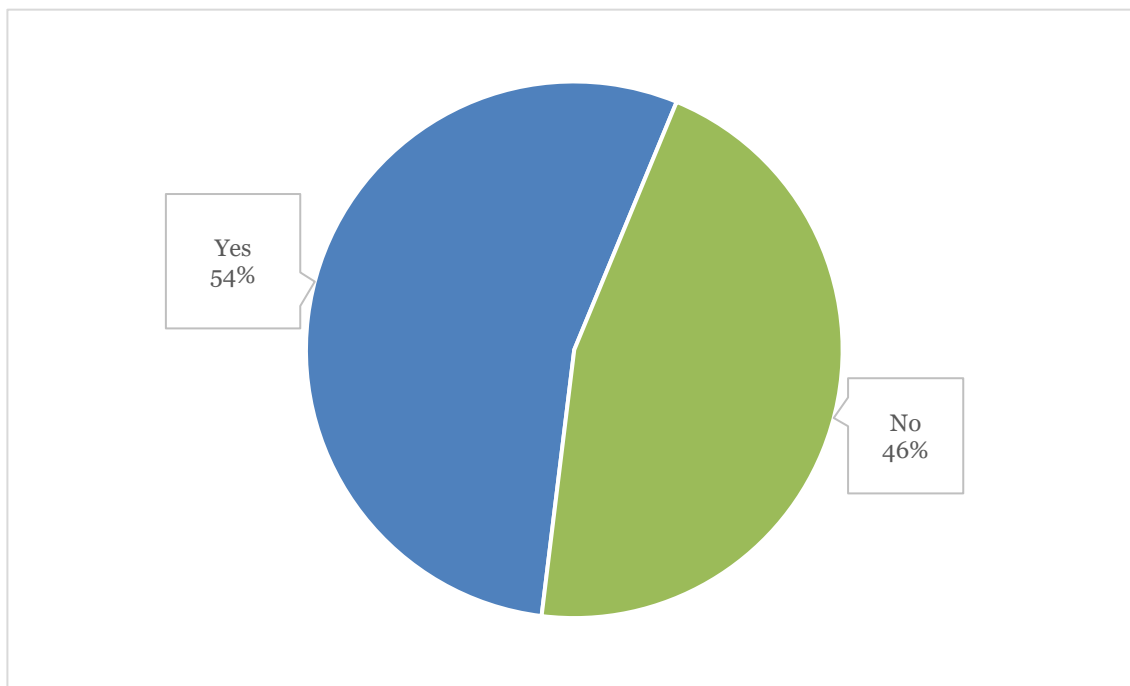
Comments:

- Generally, no. For APAC: If the conference is CME, most accreditation entities do not allow for industry input. Though we must not select or influence the selection of any faculty, and an independent decision to be made by the organizer.
- If done correctly, we wouldn't necessarily prohibit the practice, but we are rarely - if ever - asked to provide suggested faculty.
- Only upon request with a clear caveat that our contribution to the event is not dependant on the

selection of the faculty.

- We might provide this, dependent on the organization and circumstances. Unaware of this happening though.
- In the Americas region, this is prohibited.
- Employees may recommend knowledgeable faculty and categories of attendees for third-party programs.
- This would be provided by our educational team not the grant team.
- Compliance would review these requests and provide guidance.
- Depends on the law and trade association code.

47. Does your company pay for exhibit space or commercial sponsorships, even if your company determines not to fund an educational grant due to inappropriate venue or conference agenda (for example, due to the MedTech Europe Conference Vetting System)? (Please explain in the Comments)



Comments:

- Commercial sponsorship funding would be assessed separately to ensure that any promotional benefits our commercial team received were fair market value and that there was a bona fide opportunity to exhibit and engage with appropriate HCPs in an appropriate setting.
- If we receive a hybrid grant/sponsorship request, we do our best to sever the two and allow our Commercial team to follow our established process for sponsorships. Our grants committee may or may not approve the grant-specific portion of the request.
- They're not related; they're separate applications/processes in our company, but we do ask this question of applicants on our grants application for the Grants Committee's awareness/context

for decision-making.

- There could be circumstances where we sponsor an exhibit booth but decide not to provide any sponsorship for an education event for the same event. This could be due to budget reasons.
- No, if we would not support from an educational grant perspective due to venue or agenda concerns, these would be similarly flagged during the commercial sponsorship review process.
- In some cases, we will pay for exhibit space so our employees can attend and display products. In general, we will not support events that don't have an appropriate venue or location.
- We may consider an exhibit or commercial event for an event we don't believe should be supported by a grant. These decisions are reviewed by Compliance if above a certain amount.
- This is rare, but it could happen. The review processes are different, and so it would be possible for an event to qualify for booth rental but not qualify for sponsorship.
- Educational Grants are outside of the commercial business decision to attend a meeting. Grants are also not dependent on if the commercial business is participating.
- In the Americas region, Sponsorship review is independent of grant committee.
- It's possible depending on the facts and circumstances.
- We haven't had something like this come up yet, if it was inappropriate to attend for any reason, the exhibit space would most likely be denied.
- Venue requirements are the same for both sponsorships and educational grants. If we are declining the grant due to venue concerns, we would also decline the sponsorship.
- OUS we do not pay for exhibit space or commercial sponsorship if the venue or the conference agenda is inappropriate. For MedTech Europe countries and other countries with a conference vetting system the following applies: If third party event is not vetted compliant by MedTech Europe CVS or other CVS we do not contribute in any form to the event.
- An inappropriate venue per CVS decision would disqualify from a marketing activity.
- We would not display or sponsor if not an appropriate venue.
- Policies are aligned.
- Not a situation we run into.