

AdvaMed Device & Diagnostic Compliance Group

August 2025

Compliance Training Programs

Distributed: May 22, 2024 – June 20, 2025
Collated: August 1, 2025
Questions: 35
Submissions: 36
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BACKGROUND

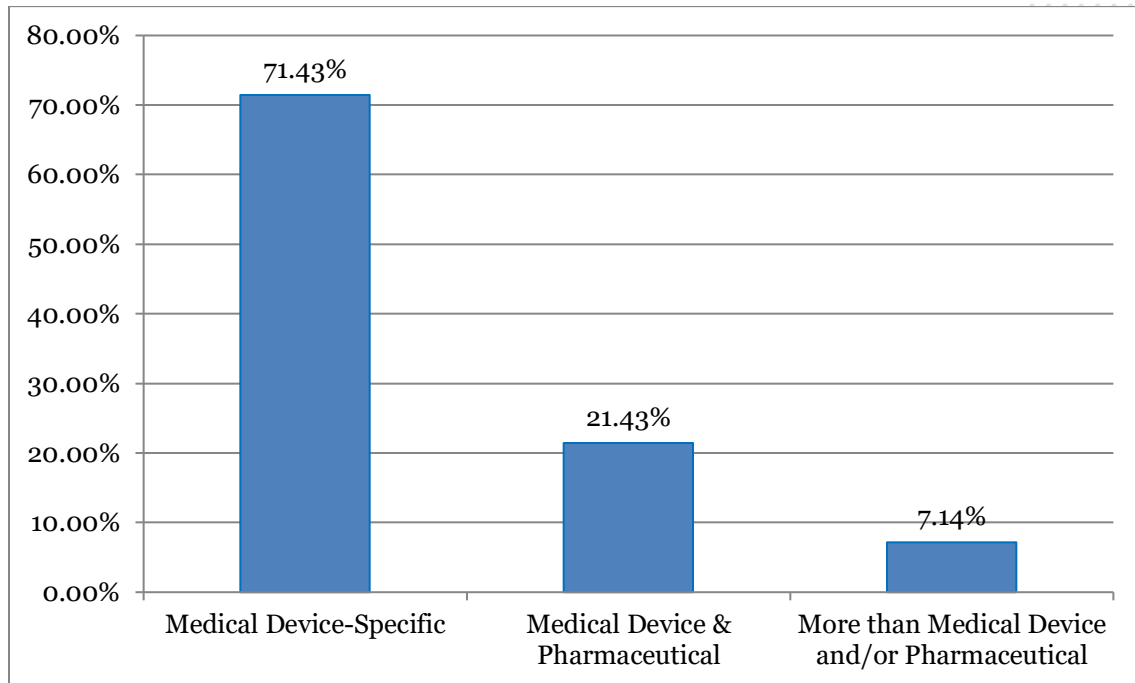
AdvaMed surveyed its members regarding their Compliance Training Programs. Thirty-five companies completed the survey in May and June 2025. This document summarizes the survey responses, including additional commentary submitted by some (but not all) companies. The responses reflect a broad cross-section 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 Compliance Training.

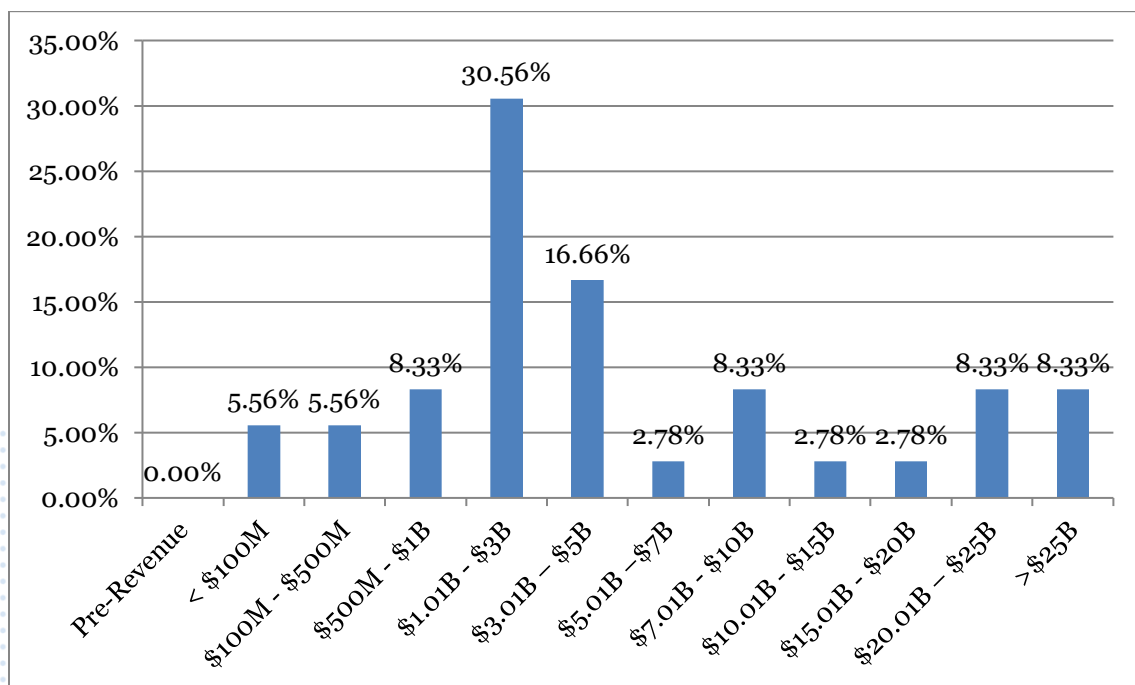


Demographics

3. Which below best describes your company?

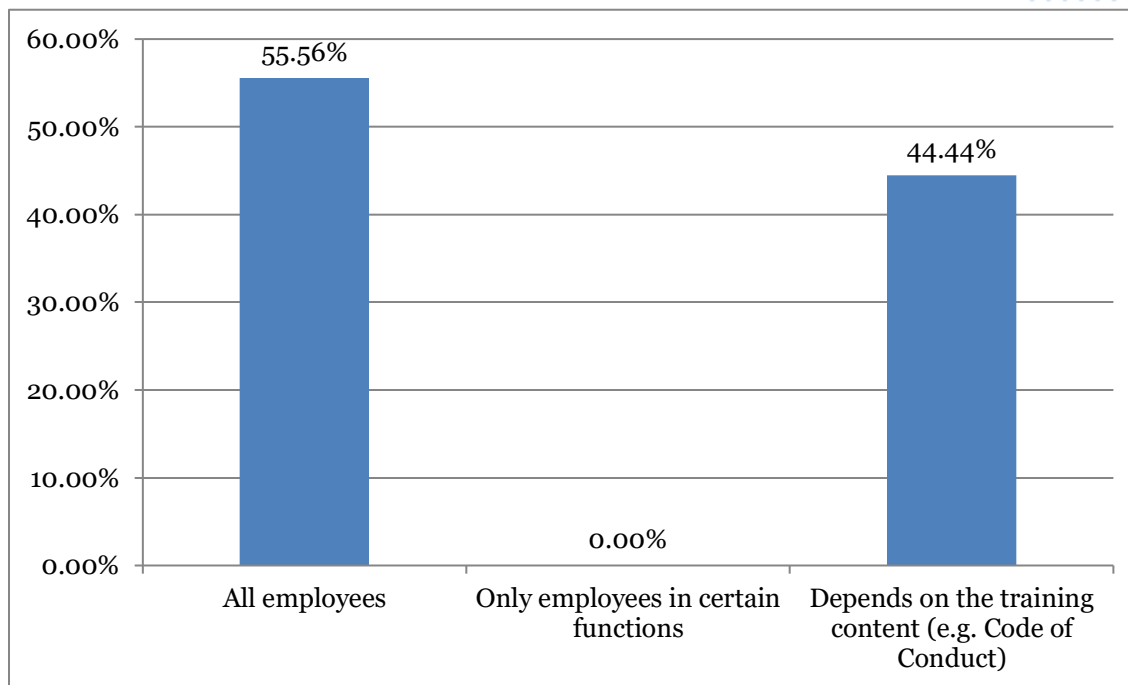


4. What was your Company's 2023 worldwide device-related gross revenue?



Compliance Training Programs

5. Does the compliance department deliver training to all employees or only to employees in certain functions?



Comparison Chart

Responses	2020	2025
All Employees	47.37%	55.56%
Only employees in certain functions	5.26%	0.00%
Depends on the training content (e.g., Code of Conduct)	47.37%	44.44%

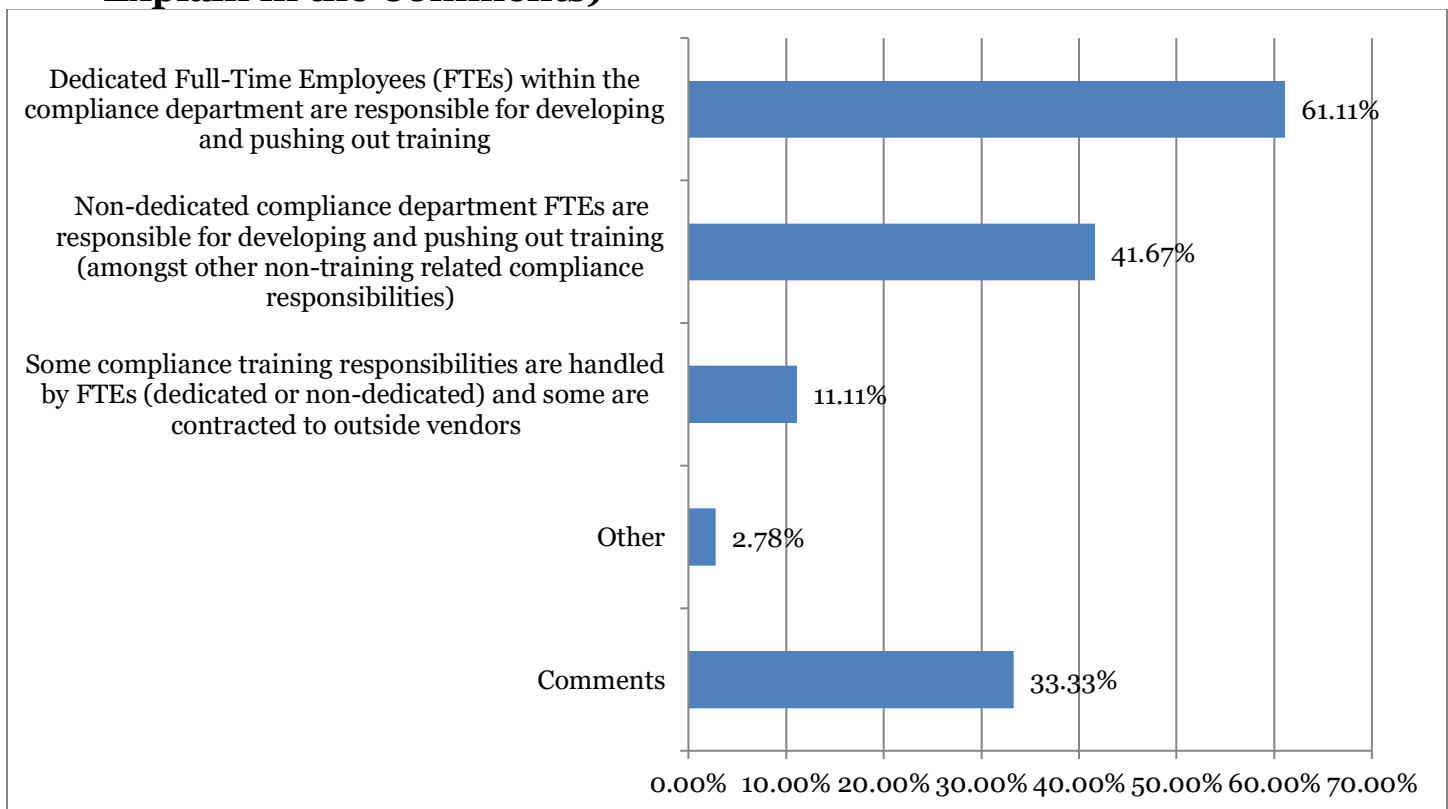
Comments:

- The first training is done "live" during employee orientation. The content is then delivered via our online training module with a test. Training with test is required for all employees annually. Annual "live" training for sales/marketing and any employee that has regular interactions with HCP's.
- Certain online training courses are deployed broadly to all employees, and then other courses are only deployed to a certain audience of employees depending on their role and responsibilities.
- All employees receive compliance training, semi-annually, and the content is based on their roles and responsibilities within the organization.
- All employees receive training. The nature of training an employee receives is dependent on their role e.g. Sales get specific role-based courses.



- Other than Code of Conduct and ABAC training which are companywide, the trainings are tailored to the audience with a focus on sales and marketing staff.
- Certain trainings such as code of conduct or hotline are disseminated to all employees, the remainder just to selected functions.
- Training varies depending on department but all employees are trained on code of conduct and other relevant topics
- All employees but it does depend on the context of the training.

6. Who within your company is responsible for the day-to-day administration of your company's compliance training program (i.e. how is compliance training staffed)? (Please Select All That Apply and Explain in the Comments)



Comments:

- We leverage content from vendors but FTEs within compliance are responsible for the final design and pushing out training. Additionally, certain compliance trainings are fully developed in-house by respective Compliance FTEs in charge of compliance trainings or supported by SMEs within the compliance teams.
- We deploy online micro learning courses with the help of our Learning and Development Team. Compliance Business Partners supplement with live training deploying a risk-based approach. Two non-dedicated FTEs on our team oversee day-to-day training questions that may arise. Other awareness responsibilities are spread out across the larger team.
- Standard trainings such as Code of Conduct training is being developed and launched by Global

Compliance Team Members. Other trainings (regional/segment/specific topics) may be developed and launched by other Compliance Team Members.

- Dedicated FTEs in the Americas region create and develop regional specific training which is pushed out by the administration group. Global training may be contracted to outside vendors depending on the topic.
- The FTEs responsible for compliance training also have responsibility for other key enterprise compliance program elements.
- Compliance team develops training content. Specialized training team in HR builds content out into modules and manages the LMS.
- Also have local education that manage instructor led training.
- It's a shared responsibility amongst the compliance team.
- We have one full-time employee dedicated to managing and launching our compliance training.
- All compliance training is delivered via the Chief Compliance Officer.
- LMS modules are contracted out.
- One (1) non-dedicated compliance department FTE.

7. If your company has dedicated Full-Time Employees (FTEs) within the compliance department responsible for developing and pushing out training, please note how many FTEs have this dedicated responsibility:

Responses Categorized by Device-Related Gross Revenue:

- **< \$100M**
 - We do not have FTE's with dedicated training responsibilities.
 - 1 dedicated FTE.
- **\$100M - \$500M**
 - 3 FTEs
 - No dedicated FTEs shared among the Compliance team.
- **\$500M - \$1B**
 - 5 respondents noted 1 dedicated FTE.
 - 3 respondents noted no dedicated FTEs.
 - 1 respondent noted 1 dedicated FTE in the US, 6 globally.
- **\$1.01B - \$3B**
 - It's a shared responsibility.
 - 3 dedicated FTEs
- **\$3.01B – \$5B**
 - 2 respondents noted 1 dedicated FTE.
 - 2 respondents noted No dedicated FTEs.



- 2 FTEs
- 1.5 FTEs
- **\$5.01B – \$7B**
 - 2 FTEs regionally and 1 global FTE
- **\$7.01B - \$10B**
 - 1-3 (spread out amongst a team, while 1 FTE is dedicated to trainings)
 - 1 dedicated FTE
 - No dedicated FTEs
- **\$10.01B - \$15B**
 - No dedicated FTEs.
- **\$15.01B - \$20B**
 - No dedicated FTEs.
- **\$20.01B – \$25B**
 - 10 total dedicated FTEs: (4) Global Education & (6) Local Education.
 - 1 dedicated FTE. Some other training responsibilities are shared by others in the department or provide input into strategy and content development.
 - 2 dedicated FTEs.
- **>\$25B**
 - 7 dedicated FTEs.
 - Approx. >5 dedicated FTEs.
 - 3 dedicated FTEs.

8. Please complete the below methods/cadence matrix to indicate your company's approach to the "how & when" of delivering training to your employees. (Annually, Quarterly, Monthly, Never)

Responses	Annually		Quarterly		Monthly		Weekly		Never		Total
Online pre-recorded/on-demand company training	79.42%	27	8.82%	3	0.00%	0	0.00%	0	11.76%	4	34
Live virtual remote instructor-led company training	30.30%	10	33.33%	11	33.33%	11	0.00%	0	3.04%	1	33
In-person instructor-led company training	51.52%	17	21.21%	7	15.15%	5	3.03%	1	9.09%	3	33
Company training, including custom short videos	58.82%	20	23.53%	8	0.00%	0	0.00%	0	17.65%	6	34
Company training via smartphone/tablet apps	15.63%	5	6.24%	2	0.00%	0	0.00%	0	78.13%	25	32
Third-party Learning Management System / Computer-Based Training / E-Learning training	71.43%	25	20.00%	7	5.71%	2	0.00%	0	2.86%	1	35
Off-the-shelf short burst training (e.g. Real Biz Shorts)	10.00%	3	10.00%	3	0.00%	0	0.00%	0	80.00%	24	30
Podcasts	9.68%	3	3.24%	1	6.45%	2	0.00%	0	80.65%	25	31
Read & Review	85.71%	30	11.43%	4	0.00%	0	0.00%	0	2.86%	1	35
Articles / Newsletters	15.62%	5	46.88%	15	12.50%	4	0.00%	0	25.00%	8	32
Awareness messages (e.g., emails, texts)	15.62%	5	46.88%	15	12.50%	4	0.00%	0	25.00%	8	32
Other	26.66%	4	0.00%	0	6.67%	1	6.67%	1	60.00%	9	15



Comparison Chart

Responses	Annually		Quarterly		Monthly		Weekly		Never	
	2020	2025	2020	2025	2020	2025	2020	2025	2020	2025
Online pre-recorded/on-demand company training	63.16%	79.42%	0.00%	8.82%	0.00%	0.00%	0.00%	0.00%	63.16%	11.76%
Live virtual remote instructor-led company training	31.58%	30.30%	5.26%	33.33%	5.26%	33.33%	0.00%	0.00%	36.84%	3.04%
In-person instructor-led company training	55.56%	51.52%	5.26%	21.21%	5.26%	15.15%	0.00%	3.03%	47.37%	9.09%
Company training, including custom short videos	38.89%	58.82%	0.00%	23.53%	0.00%	0.00%	0.00%	0.00%	68.42%	17.65%
Company training via smartphone/tablet apps	23.53%	15.63%	0.00%	6.24%	0.00%	0.00%	0.00%	0.00%	84.21%	78.13%
Third-party Learning Management System / Computer-Based Training / E-Learning training	47.06%	71.43%	5.26%	20.00%	0.00%	5.71%	0.00%	0.00%	68.42%	2.86%
Off-the-shelf short burst training (e.g. Real Biz Shorts)	27.78%	10.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00%	89.47%	80.00%
Podcasts	X	9.68%	X	3.24%	X	6.45%	X	0.00%	X	80.65%
Read & Review	61.11%	85.71%	5.26%	11.43%	5.26%	0.00%	0.00%	0.00%	42.11%	2.86%
Articles / Newsletters	5.56%	15.62%	22.22%	46.88%	5.26%	12.50%	0.00%	0.00%	66.67%	25.00%
Awareness messages (e.g., emails, texts)	10.53%	15.62%	29.41%	46.88%	0.00%	12.50%	0.00%	0.00%	64.71%	25.00%
Other	X	26.66%	X	0.00%	X	6.67%	X	6.67%	X	60.00%

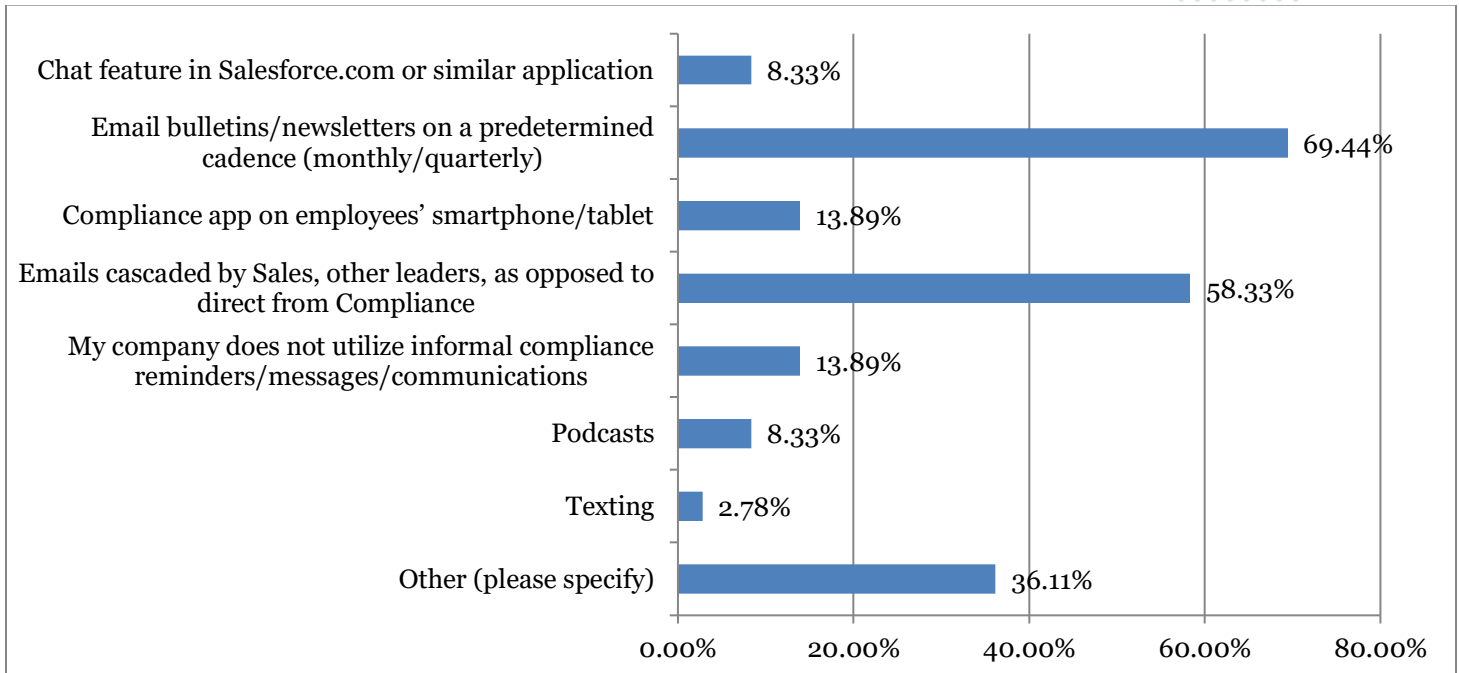
Comments:

- Annual Compliance/Code of Conduct training (developed in-house, in partnership with third party vendor), read and acknowledgement of policies required only upon hire (although we're moving away from this), annual Compliance Week trainings include live webinars and posts to Vevea Engage, quarterly Compliance Newsletters provide additional training and awareness. We also do live and virtual "Compliance Road Shows" once a year in key offices.
- It varies based on the employee's position. The first training is done "live" during employee orientation. The content is then delivered via our online training module with a test. Training with test is required for all employees annually. Annual "live" training for sales/marketing and any employee that has regular interactions with HCPs.
- All employees complete mandatory training and code certification in an annual basis. Role-based modules are issued on a defined cadence. In-person training is done on ad hoc basis based on need and in-person training is conducted for high-risk groups within a fixed period after appointment.
- Live and pre-recorded training is usually done on an as-needed basis and could be more often than quarterly, depending on demand. LMS trainings are also supported and available via smartphones/tablets.
- Annual National Sales Meeting training; (Not considered 'training': Annual Corporate Compliance & Ethics Week activities; Leader Panels (2x annually); talking points, other videos); quick reference guides; leader toolkits; Annual Privacy Day.
- We hold an annual "Compliance Week" awareness and training campaign.
- Compliance Day held each year.
- Ad Hoc training or reinforcement messaging is done various times throughout the year.
- Our annual training is delivered in semi-annual segments. New hire training is provided monthly to all new hires.
- Read and review training is provided as needed—for example, when there are updates to relevant policies.



- Some of these training categories are delivered on an as-needed basis versus a regular schedule.
- We provide most of these training items in an ad hoc basis.
- Some trainings may be bi-annually.

9. Which of the below methods of communication (other than formal training courses) does your company utilize for alternative methods of training/compliance communications? [Please select all that Apply.]



Comments:

- Selected 'other' as the reminders are intermittent and related to "hot topics" or reminding employees when there has been an issue that others could benefit from hearing the best practice or policy "again".
- Communications via articles on company intranet and Viva Engage. Additionally, Compliance resources and tools are also made available via company app to sales and marketing team members in the US.
- We leverage Compliance Week to share communications and details in virtual and live settings.
- Company Internal Website, Townhalls, Leadership Staff Meetings, Sales Meetings.
- See above comments to question #8; Regional Compliance Committee meetings.
- Company Intranet posts and guidance, E&C page posts and guidance.
- Online learning sessions on select topics with partner law firms.
- Presentations and communications delivered at business meetings.
- Company and business unit town halls (monthly/quarterly).
- Aspiring to develop a more routine communication cadence.
- Quarterly Ethics & Compliance Manager Tool-kit.
- Video chats posted to sales apps.

- In-person "road show" site visits.
- Humor-based video series.

10. Please complete the below topic/cadence matrix to indicate your company's approach to the "what & when" of training. (Annually, Quarterly, Monthly, Never)

Responses	Annually		Quarterly		Monthly		Weekly		Never		Total
AdvaMed Code of Ethics	67.65%	23	0.00%	0	8.82%	3	0.00%	0	23.53%	8	34
Company Code of Conduct	91.66%	33	2.78%	1	5.56%	2	0.00%	0	0.00%	0	36
Conflict of Interest	94.12%	32	0.00%	0	2.94%	1	0.00%	0	2.94%	1	34
Ethical leadership	69.70%	23	9.09%	3	3.03%	1	0.00%	0	18.18%	6	33
Anti-Bribery/ Kickback / Corruption	80.56%	29	8.33%	3	8.33%	3	0.00%	0	2.78%	1	36
Data Privacy	91.66%	33	0.00%	0	5.56%	2	0.00%	0	2.78%	1	36
Charitable Donations	79.42%	27	2.94%	1	5.88%	2	0.00%	0	11.76%	4	34
Travel & Expense Policy	80.55%	29	5.56%	2	8.33%	3	0.00%	0	5.56%	2	36
Off-label promotion	86.11%	31	2.77%	1	5.56%	2	0.00%	0	5.56%	2	36
Employee Interactions with Third-party Intermediaries/Distributors	76.47%	26	5.88%	2	5.88%	2	0.00%	0	11.77%	4	34
Other (please specify)	50.00%	4	12.50%	1	25.00%	2	0.00%	0	12.50%	1	8

Comparison Chart

Responses	Annually		Quarterly		Monthly		Weekly		Never	
	2020	2025	2020	2025	2020	2025	2020	2025	2020	2025
AdvaMed Code of Ethics	84.21%	67.65%	0.00%	0.00%	0.00%	8.82%	0.00%	0.00%	15.79%	23.53%
Company Code of Conduct	100%	91.66%	0.00%	2.78%	0.00%	5.56%	0.00%	0.00%	0.00%	0.00%
Conflict of Interest	94.74%	94.12%	0.00%	0.00%	0.00%	2.94%	0.00%	0.00%	5.26%	2.94%
Ethical leadership	64.71%	69.70%	23.53%	9.09%	5.88%	3.03%	0.00%	0.00%	11.76%	18.18%
Anti-Bribery/ Kickback / Corruption	94.44%	80.56%	11.11%	8.33%	0.00%	8.33%	0.00%	0.00%	0.00%	2.78%
Data Privacy	77.78%	91.66%	0.00%	0.00%	5.56%	5.56%	0.00%	0.00%	16.67%	2.78%
Charitable Donations	76.47%	79.42%	17.65%	2.94%	0.00%	5.88%	0.00%	0.00%	11.76%	11.76%
Travel & Expense Policy	83.33%	80.55%	5.56%	5.56%	0.00%	8.33%	0.00%	0.00%	16.67%	5.56%
Off-label promotion	94.12%	86.11%	11.76%	2.77%	0.00%	5.56%	0.00%	0.00%	0.00%	5.56%
Employee Interactions with Third-party Intermediaries/Distributors	82.35%	76.47%	5.88%	5.88%	0.00%	5.88%	0.00%	0.00%	11.76%	11.77%
Other (please specify)		50.00%		12.50%		25.00%		0.00%		12.50%

Comments:

- Additional online courses in the Compliance Curriculum that are assigned to specific targeted audiences on a periodic basis: Trademark Use and Protection Training; Protecting Intellectual Property; Export Compliance: Global Trade Sanctions; MedTech Europe Code of Ethical Business Practice; Forced Labor; Global Competition; Global Financial Fraud Prevention; Managing Within the Law (EEOC, FMLA); Anti-Harassment and Discrimination – US/PR; Preventing Harassment – OUS; Physician Payments Sunshine Act; Insider Trading; Protecting Patient Health Information under HIPAA.
- Some of the topics listed are included in our annual Company Code of Conduct training, and are not

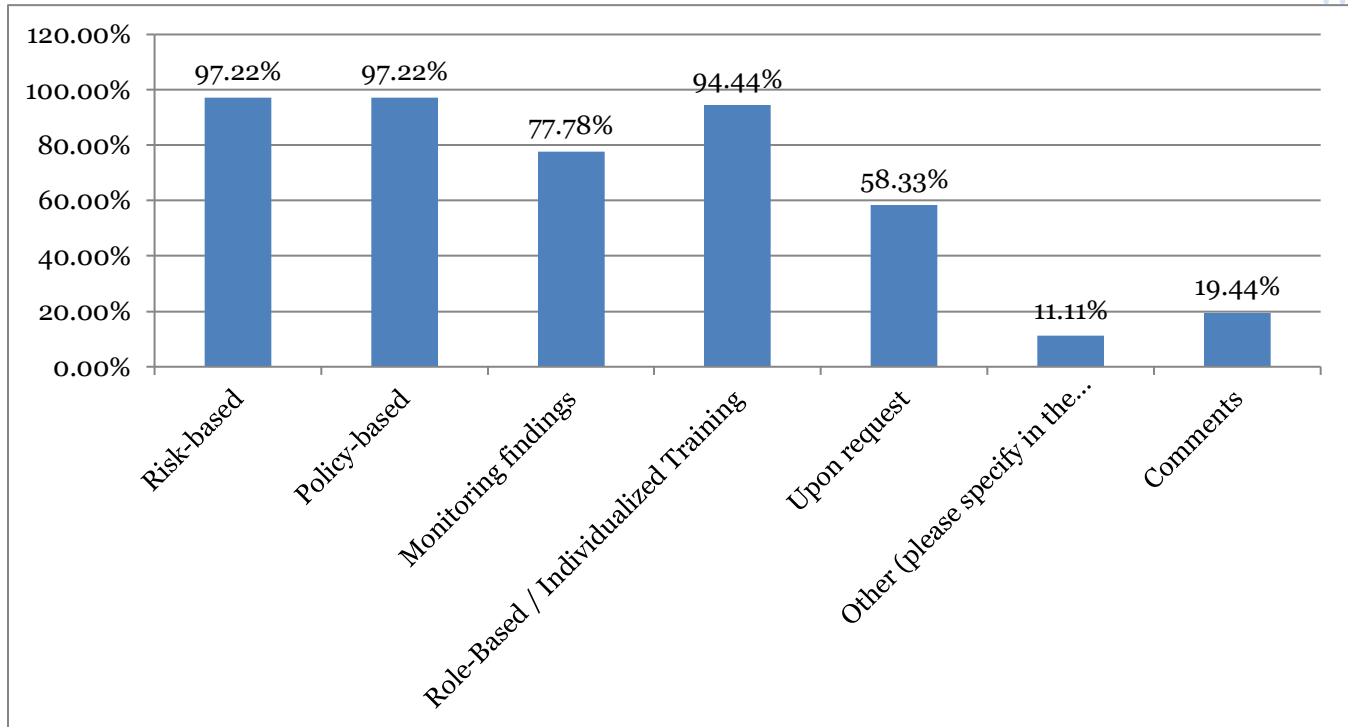


standalone trainings (e.g., Conflict of Interest, Anti-Bribery/Kickback/Corruption); other topics are only covered during onboarding/new hire training (e.g., Charitable Donations, HCP Travel & Expense Policy, etc.).

- In addition to the above trainings, we also have annual Separation, HCP Interaction and Open Payments Reporting trainings. We also provide New Hire and Aggregate Spend Tool at onboarding, as well as Tradeshow training as needed.
- AdvaMed Code of Ethics is incorporated within monthly new hire training. Not all noted content are standalone courses, but addressed in various policy/procedure trainings, with some delivered more frequently as needed.
- We have numerous policies and a training courses in place that apply principles on interactions with customers and healthcare professionals as referenced in the AdvaMed Code.
- We also train on Educational Grants, HCP Engagements, and Product Samples and Evaluations. These are tailored trainings that highlight the company's policies.
- Ad Hoc training or reinforcement messaging is done various times throughout the year.
- We may provide additional training between annual sessions on select topics as needed or as opportunities arise.
- The AdvaMed Code of Ethics, as well as other industry codes are incorporated in the training.
- Listed content is embedded within role-based courses rather than being delivered as specific courses unless there is an ad hoc need in a region/team.
- Other: Social Impact and Sustainability.
- Interactions with Health Care Professionals.
- We do not use Third-party Intermediaries/Distributors.



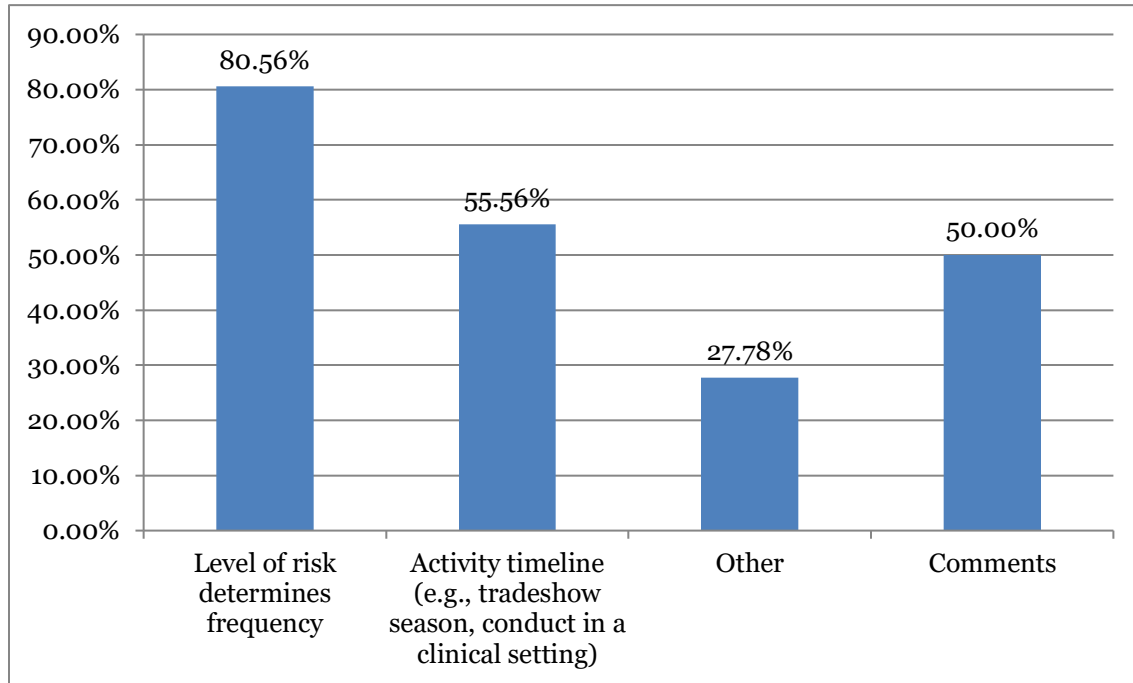
11. How does your company determine the topics/focus of your company's compliance training? [Please select all that Apply]



Comments:

- Our training strategy includes broad, micro learnings on a variety of compliance topics. In addition to our Standards of Business Conduct course, we conduct approximately 10 other web-based training courses that are sent to employees on an annual basis. Some of those training topics include HIPAA, the Antikickback Statute, the False Claims Act, and the Antibribery and Anticorruption Statutes. These training courses are situation-based, providing employees with a general understanding of compliance concepts and examples of what to do if they encounter similar situations. We supplement our online training courses with instructor-led training, which is risk-based depending on roles and responsibilities and any monitoring findings.
- Investigations, sales meetings, advisory boards, Helpline inquiries, news, industry societies, industry vendors, etc.
- As determined by risk-based analysis on specific topics.
- Executive leader training (almost) quarterly.
- Culture of Compliance survey.
- New hire training.
- Location-based.

12. What factors determine the frequency of your company's compliance training? (Please Select All that Apply and Explain in the Comments)



Comments:

- Generally, our training is annual; however, we host "special training" for select employee functions when we believe there is risk or misunderstanding of a policy or expected behavior. We do selective informal training prior to trade shows. Compliance attends the major trade shows and has a presence in the booth.
- We're currently moving to an annual Compliance training model, with additional in-person training and awareness campaigns throughout the year in response to monitoring findings, at national/regional sales meetings, before tradeshow, etc.
- We are training on our Code of Conduct and Ethics and Anti-bribery policy on an annual basis. Other topics are assigned either as needed (audit/monitoring finding) or on a training cycle based on risk and current topics/relevance.
- Annual Compliance Program Goals, Investigations, Monitoring or Auditing findings and recommendations, system/process/policy/procedure changes.
- Annual Regional and Global Training Plans determine frequency based on risk and need based on monitoring findings, policy violations, etc.
- Much of what we do is annual. We do ad hoc communications to address other issues that might be timely, such as a reminder of gifts and entertainment during the holiday season.
- We deploy our online training courses annually and supplement with live training throughout the year using a risk-based approach.
- Risk drives frequency; also, activities present opportunities to train if we know certain target groups will be together.
- Where there may be elevated risk or behavior patterns, we will enroll or conduct live training around these topics and procedures.

- Our Company Code of Conduct requires all associates to confirm, in writing, that they've read and understand the Code, each year.
- The Compliance Training Plan is determined annually with room to add supplemental trainings as needed.
- For example, Sales receive training with a higher frequency than Finance.
- Annual, live-training and newsletters focused on timely topics.
- Audits, state and federal laws/regulations.
- Compliance resources to conduct training.
- Regular cadence.
- As need arises.
- Resources.

13. What compliance topics are designated for in-person instructor-led training or Live virtual remote instructor-led company training (i.e., live Zoom, Teams) (e.g., higher risk areas vs general laws - HCP interactions such as business courtesies (travel, meals), educational grants)?

Responses:

- Global trainings are delivered via eLearning, topics include Code of Business Conduct and Ethics, Anti-Bribery and Anti-Corruption, Conflicts of Interest, Trade Compliance, People Manager training, high risk party sponsor trainings and role-based trainings (critical functions). Then, regional teams are responsible for training on more local specific topics for their country/region as needed via live or recorded sessions.
- Generally, in-person instructor-led trainings or live virtual remote instructor-led trainings are aligned with business risks and needs. They are also provided where we do not have a training in our learning management system, or where the learning management system is not available to employees. Examples are: New Hire and HCP Interactions trainings, as well as Code of Conduct training for manufacturing employees.
- We have a three-hour training session which is done in person for new employees and then annual training for sales and marketing (2 hours) and other employees who have regular interaction with HCPs that are more focused on policies/business courtesies, educational programs, vs. general laws. All employees have to complete the full annual training via online program with a test.
- (1)New Employee Orientation which covers a compliance overview including regulatory requirements, company policies and procedures, industry standards, etc. (2)New compliance-related policies or requirements may also warrant live virtual remote training to allow for Q&A. (3)Annual compliance training for the Board.
- We aim to conduct new hire training in person focused on the key areas of the engagements and interactions with HCPs. We also conduct training when we identify patterns of behavior or elevated risk. Virtual trainings are focused on the general compliance topics (Code of Conduct, Speak-up, Fraud, etc.).
- We train in-person where feasible. Given remote workers, our instructor-led trainings that supplement our annual online training courses are typically deployed virtually.



- 7 elements of compliance; Ethical conduct and corrective actions; Consequences of non-compliance; Compliance as an element of performance; Interactions with HCPs involving remuneration; AdvaMed code principles; Gift giving and gift receiving; HIPAA privacy & security rule; Sunshine Act; Conflicts of interest; Use of hotline; Where to look to find resources; Who's on the Compliance Team.
- Training for New Hire Sales & Marketing Employees; Training for the Board and related committee members (members of the E&C Committee, Risk Management Committee, Grants & Donations Committee); Policy training (as applicable); Training on high-risk topics/audit-identified topics (e.g., HCP Engagements & Interactions); Training on FCPA.
- In person or live teams; ABAC in country-specific risks; HCP/GO Interactions; TPIs engagement; Ethical Decision Making; Speak up/listen up; Harassment/retaliation training.
- We do HCP engagement and third-party engagement training either live or via Zoom. Also, much of the AKS training we provide our sales force is live in the field.
- We may complement virtual on-demand training with in-person/live training for designated high-risk topics and customer-facing audience.
- When we drill down a level to the process/procedure specifics for a business/division/location then ILTs are the preferred method.
- We do live training either if the topic is sensitive, or leveraging employee gatherings (sales meetings, for example).
- Training logistics are based on audience location/geography and whether they are tied to a brick-and-mortar facility.
- Introduction to HCP interactions for new sales employees; ad hoc training as specific risks are identified.
- In-person trainings vary annually depending on monitoring findings, risks, and business requests.
- Orientation, Code of Conduct, Sales Training - HCP Interactions, Transparency reporting, and Charitable Donations & Grants.
- There are no specific topics that are designated/required for in-person training. The virtual setting is always offered as most efficient way to reach field employees.
- Code for manufacturing is in person because they do not have computer access. Everything else is live virtually unless it aligns with a live in-person meeting.
- New Sales Rep Training - in-person instructor-led training or Live virtual remote instructor-led company training (i.e., live Zoom, Teams).
- New employee on-boarding, third party interactions. Other topics as needed and based on compliance officer decision.
- New hire training is led live or virtual which include CoC, CoI, HCP interactions, and AdvaMed.
- Virtual training can be most efficient with a sales team of 200+.
- Interactions with Healthcare Professionals and Healthcare Organizations.
- It depends based on need and risk for global and divisions and affiliates.
- Educational grants, HCP interactions, on- vs off-label.
- HCP interactions, ABAC and Third-Party Conferences.
- It depends on location and employee availability.



- Conflict of Interest, HCP Interactions, Meal caps.
- Process and system training, leadership training.
- Interactions with HCPs - all categories.
- Travel expenses & HCP expenses.
- All of the above.
- As need arises.
- New Employee.
- New Hire.

14. What topics does your company designate for standalone compliance trainings (e.g., 30-minute/1-hour training on a dedicated topic like: code of conduct, conflict of interest, ethical leadership, charitable donations)?

Responses:

- Anti-Corruption; Asset Management; Communicating Carefully for Business Success; Conduct of Representatives in a Clinical Setting; Digital Marketing Privacy Policy; Fair Competition; For Managers: Conflicts of Interest; Grants, Investigator Initiated Trials, Healthcare-Related Charitable Contributions; HCP Consulting Arrangements; Interactions with Healthcare Professionals – Meals, Travel, Educational Items; Jointly Conducted Education & Marketing Programs; Privacy Training; Product Communications; Safeguarding Confidential Information; Third Party Code; Third Party Manual of Policies and Guidelines; Third Party Management Training.
- We have the following standalone compliance trainings: Code of Conduct; Global Interaction Policy; Charitable Donations, Grants & Sponsorships; Global Separation Policy (Commercial from Research/Product Development); Aggregate Spend Tool (HCP engagement); Ethical Leadership; Open Reporting; Anti-Kickback, Anti-Bribery, Anti-Corruption; New Hire Training; Tradeshow Training; HCP spend-related expenses for T&E.
- Code of Business Conduct; HIPAA; Policy training (as applicable); Training for New Hire Sales & Marketing Employees; Training for the Board and related committee members (members of the E&C Committee, Risk Management Committee, Grants & Donations Committee); Policy training (as applicable); Training on high-risk topics/audit-identified topics (e.g., HCP Engagements & Interactions); Training on FCPA.
- Code of Conduct and Ethics (includes Conflicts of Interest); Anti-Bribery and Anti-Corruption; Trade Compliance; People Manager; Business Sponsor (TM in charge of high risk third parties, e.g. distributors and sales agents); Critical Functions (topics vary by role); Data Privacy (legal is responsible).
- ABAC + Third Party Vendors; Code of Conduct; Conflicts of Interest; Competitive Practices; Privacy; Ethical Leadership; HCP interactions (inclusive of charitable donations and other similar topics).
- Code of Conduct; Conflicts of Interest; Engaging HCPs for Consulting Services; Speak Up (compliance hotline promotion); Third-Party Conference Reminders; Compliance Training for HCP Speakers.
- See Q#10 above - Code of Conduct; Global Standards.
- Code of Conduct is always a standalone training. For all other areas of training we have moved from a policy-based training to a risk area-based training. So ABAC training related to HCP interaction can include, by way of example, HCP Consulting, HCP Hospitality, Sunshine Act Obligations.



- Code of conduct; conflicts of interest; data & privacy; capital equipment; fraud, waste & abuse; HCP interactions and anti-kickback risks; scientific integrity; grants & donations; insider trading; anti-corruption, anti-bribery; fair competition; off-label use; US Government transactions; transparency reporting; reimbursement; market development.
- Instructor-led trainings could cover a variety of Compliance topics, including conflicts of interest, interactions with customers and healthcare professionals, data privacy, business conduct line, elements of a compliance program, etc.
- Code of Conduct and Data Privacy/Security are 45 minutes and other topics range from 10 to 20 minutes.
- Code of conduct is a standalone training that is required of all employees. Other trainings are depending on responsibilities, recent findings, etc.
- Product promotion, Data Privacy, T&E, CoI, CoC.
- Code of Conduct, Anti-Corruption Policy, Interactions with Health Care Professionals, Conflict of Interest, Anti-Kickback Statute, Transparency Reporting.
- 30min -1 hour - code, anticorruption. 1 Hour for Sales/Medical New Hire HCP interactions training, 20-30min for pre-conference HCP interactions.
- Code of Conduct, which contains a variety of topics, including ethical business conduct, ABAC, HCP interactions, COIs, and more.
- Code of conduct, interactions with HCPs (which covers range of high-risk interactions); meals; medical education.
- Data Privacy, Anti-bribery/Anti-Corruption, Records Management, Investigation, and HCP Interactions.
- On-line training may take less time vs. live on-boarding or other ad hoc training for commercial employees.
- Code of Conduct is stand alone; Human Rights in supply chain; Interactions with HCPs; Data Privacy.
- Company Code of Conduct (30 minutes, annually), AdvaMed Code (45 minutes, annually).
- Business courtesies, educational programs, off-label promotion, social media postings.
- It depends based on need and risk for global and divisions and affiliates.
- Code of Conduct, interactions with Healthcare providers, T&E.
- Code of Conduct, Conflict of Interest, Open Payments.
- Code of Conduct, AdvaMed Code, ABAC, Privacy.
- Code of Conduct & Interactions with HCPs.
- Any topic on US Healthcare Compliance.
- Code of conduct - obligation to report.
- Depends on the need of the business.
- Risk-based and onboarding training.
- Code of Conduct, ABAC.
- Code of Conduct.
- None at this time.

15. How many total hours of compliance training is your company providing annually (excluding new hire/onboarding training)?

Responses:

5 Respondents noted 1 hour or less of annual compliance training. Some additional details:

- Less than an hour per employee, with some functions getting more based on role. Also we have adaptive courses that offer test out features that can save time for some team members who understand compliance concepts already.
- 1 hour or less of dedicated Compliance training annually (which does not include trainings from other departments like Quality, Data Privacy, and HR).
- ~1 hour of annual online training courses, which is supplemented with virtual instructor-led trainings.
- 1 hour.
- 30 minutes.

4 Respondents noted 1-2 hours of annual compliance training. Some additional details:

- We have different numbers depending on the year: for 2024 general employees received 42 minutes of compliance training, if you interact with HCPs then it was 67 minutes, if you're a people leader it was 62 minutes and an HCPi facing people leader was 87 minutes; in 2025: general employees were 100 minutes, HCPi facing were 125; people leaders were 125 and HCPi facing people leaders were 150.
- 1-2 hours.
- 2 hours.
- 2 hours.

7 Respondents noted ~ 3 hours of annual compliance training. Some additional details:

- 2-3 hours.
- Up to 3 hours.

6 Respondents noted 4-5 hours of annual compliance training.

- 5 hours of training annually.
- 4-5 hours.
- About 4.5 hours of standard compliance training content with supplemental trainings assigned as needed.
- Less than 5 hours.
- 4 hours.
- 4 hours.

5 Respondents noted 5-10 hours of annual compliance training

- It depends on the employee's function. Usually about 10 hours total, but it really varies.
- 6-10 hours.
- 5-10 hours.
- 8 hours.
- 10 hours.

3 Respondents noted 10 – 30 hours of annual compliance training.

- Trainings are generally 15-45 minutes each, and we launch approximately 18 courses a year. Total hours vary by role.
- Online courses 10-15 hours annually/per associate.
- 30 hours.

Additional Responses:

- Over 100 hours.
- This goes back to our on-year/off-year approach - 2024 was a refresh year and 2025 is a foundational training year.
- It depends based on need and risk for global and divisions and affiliates.

16. How often is your company providing refresher training on key topics, and what topics are designated for refresher training?

Responses:

17 respondents noted annual trainings - some of which are refresher training. Some additional details:

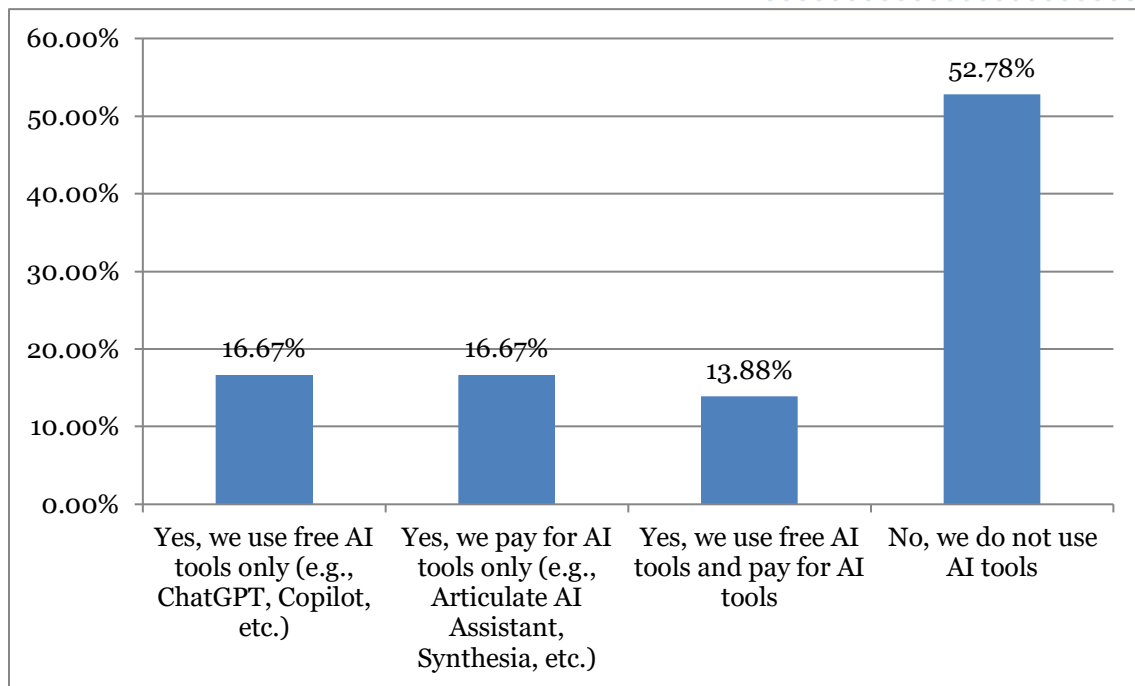
- Annual Refresher training would include training on our Code of Conduct, Conflicts of Interest, and Anti-Bribery and Anti-Corruption. Trade compliance is also refreshed annually. We also have refresher training on an annual or bi-annual cycle for critical functions, topics including: Interactions with HCPs and Government Officials; Engaging HCPs as consultants; Business Courtesies; Demonstration and Evaluation products; Grants and Donations; Maintaining effective controls.
- We're moving away from large amounts of refresher trainings to a short (but engaging) annual training plus frequent awareness campaigns (Compliance Week, quarterly newsletters, pre-conference/event trainings, sales meetings).
- Many trainings are re-assigned on an annual basis (e.g., code of conduct, conflicts of interest, HCP interactions reminders) along with any areas that are identified through monitoring trends, risk assessment or investigations.
- Either 1-2 times a year or as needed. Topics designated for refresher trainings are: Separation of Commercial from Research/Product Development, HCP Interactions, HCP Meals and other T&E, Code of Conduct.
- Annually for Code of Conduct, Conflicts of Interest, Anti-Bribery and Corruption, Anti-Kickback Statute, Fraud, Waste, Abuse, Hotline.
- Some topics are annual (e.g., Company Code of Conduct, AdvaMed Code), other topics are every 2-3 years (e.g., Anti-Corruption).
- Annually, unless we see recent trends and we may do additional training throughout the year. All trainings require a refresher.
- We do refresher training annually and redesign courses every two years. We also offer test outs to assess knowledge retention.
- Annual training on key topics and refresher training when there are new rules/regulations or an update to a procedure.
- Yearly, the topics varies depending on changes in law and emerging topics identified in risk assessments.
- Annually, although there is not really a specific designation of refresher topics.
- Usually annually, but it's decided on a risk-based approach.
- Annual: Code of conduct, Data Privacy, Medical Education.
- Annual on specific topics to job function.
- Ongoing, depending on need. At least annually.



Additional Responses:

- Every 3 years.
- Every 3 years, unless legislation is updated.
- We provide refreshers every other year on all of our trainings: ABAC + Third Party Vendors; Code of Conduct; Conflicts of Interest; Competitive Practices; Privacy; Ethical Leadership; HCP interactions (inclusive of charitable donations and other similar topics).
- Quarterly and ad-hoc.
- Bi-annually.
- Code of Conduct / Making Ethical Decisions, Conflicts of Interest, Speaking Up.
- Varies by year and by identified risk; are always refreshers on various HCP interaction topics and kickback risks.
- No real cadence to note, but industry trends, or topics determined through monitoring.
- It depends on need, as well as opportunities through sales meetings, town halls, and other settings.
- It depends on the training. Usually, refresher training is organized based on monitoring findings.
- Refresher training could cover a variety of Compliance topics, including conflicts of interest, interactions with customers and healthcare professionals, data privacy, business conduct line, elements of a compliance program, etc.
- It depends based on need and risk for global and divisions and affiliates.
- AKS - False Claims - 3rd Party Due Diligence - T&E.
- Under consideration.
- As needed.
- As needed.
- We do not typically use refresher training.

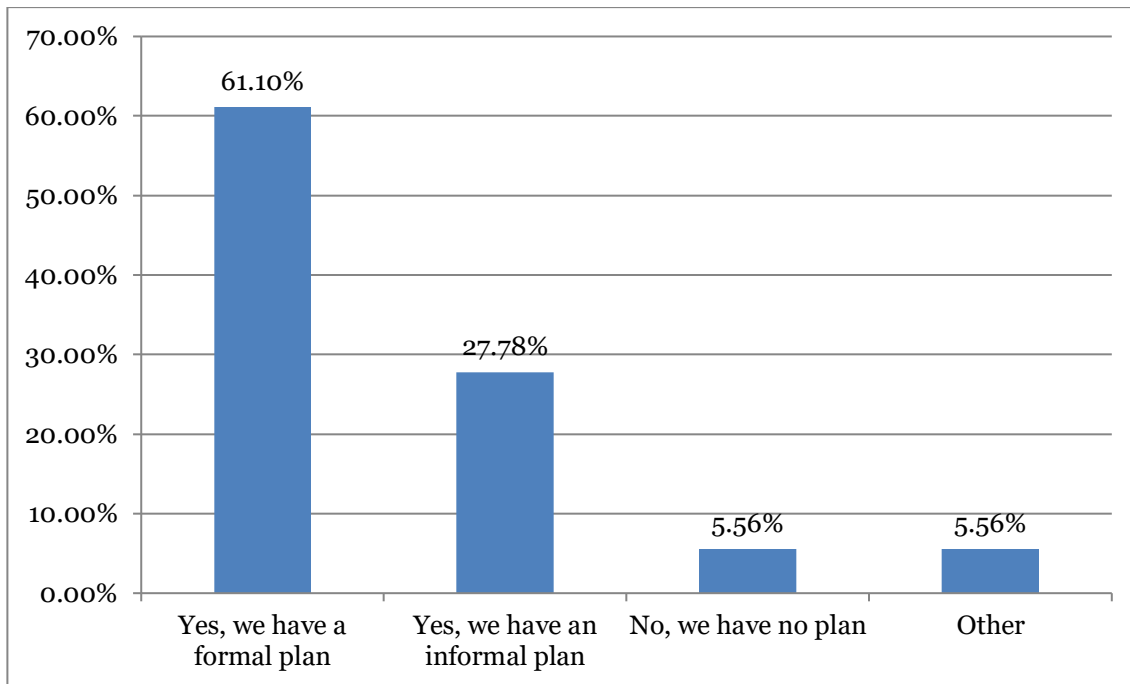
17. Does your company use Artificial Intelligence (AI) tools to design and/or develop training content?



Comments:

- We have recently begun to use company-approved CoPilot features for certain training topics and communication materials.
- We also use an in-house AI tool and are considering using Articulate AI Assistant, but do not use that yet.
- We recently implemented AI tools but have not used them for training content at this time.
- We are looking into AI tools, but at this moment, we are not using these tools for training.
- Free and paid tools are available, and we're exploring ways to use them in the future.
- Not using AI tools currently but looking at options.
- Do not currently use AI, but are exploring this option.
- We have just piloted use of AI for one module.
- We'll definitely utilize it in the near future.
- We started using Copilot.

18. Does your company follow an annual compliance communication plan/calendar?



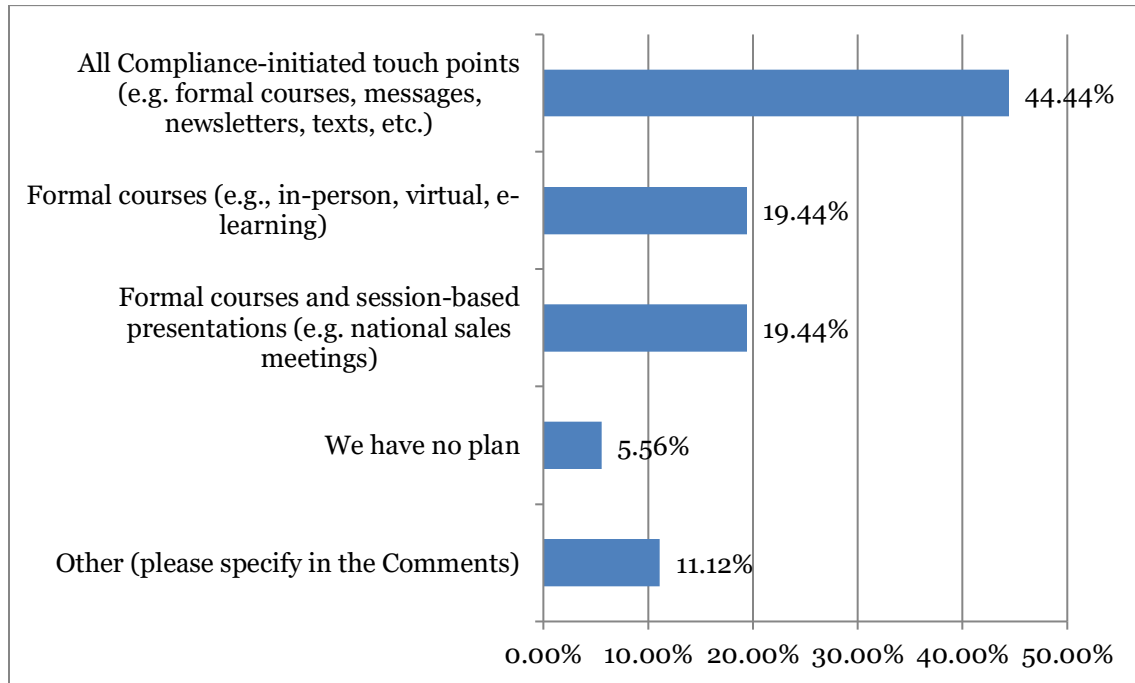
Comparison Chart

Responses	2020	2025
Yes, we have a formal plan	47.37%	61.10%
Yes, we have an informal plan	47.37%	27.78%
No, we have no plan	5.26%	5.56%
Other		5.56%

Comments:

- We prefer the flexibility of a somewhat informal plan, but we generally know in which quarter(s) we'll provide certain trainings.
- We have a formal plan for online training, but live training is risk-based and changes depending on the business activities.
- It depends based on need and risk for global and divisions and affiliates.
- Not specifically an annual compliance communication plan.

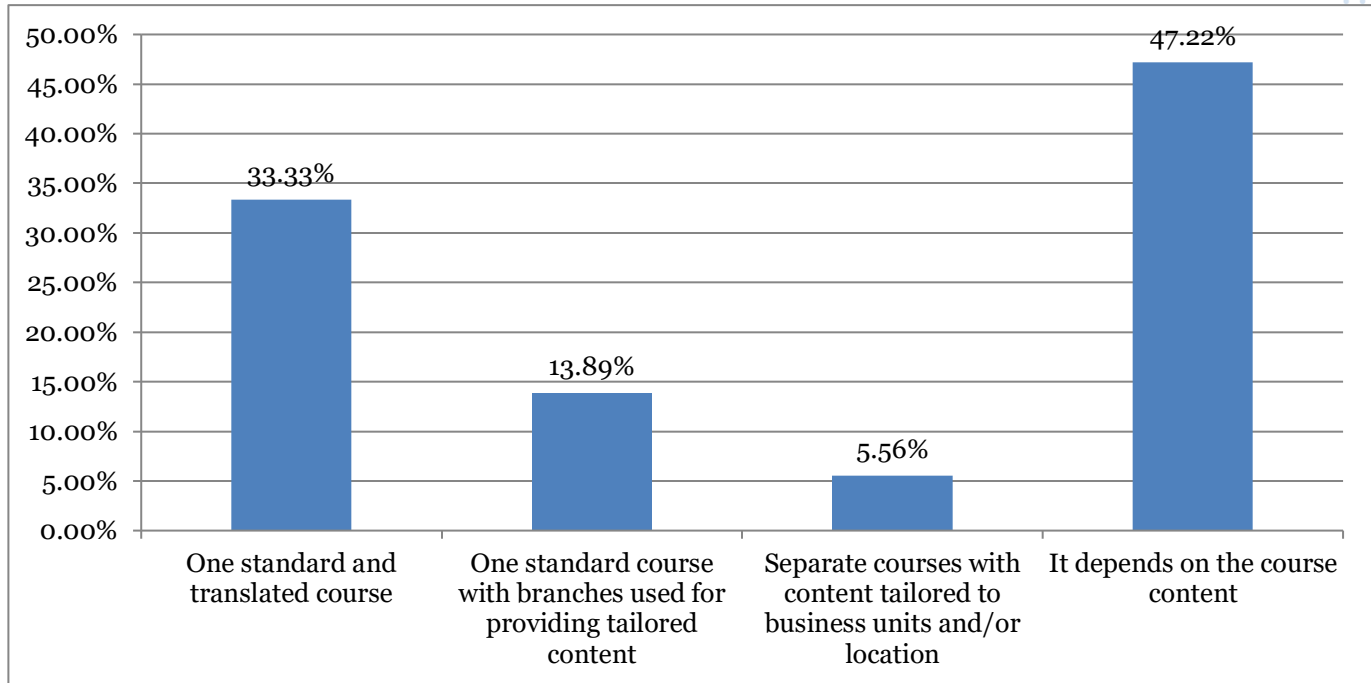
19. What does your company include within the scope of your annual compliance training plan?



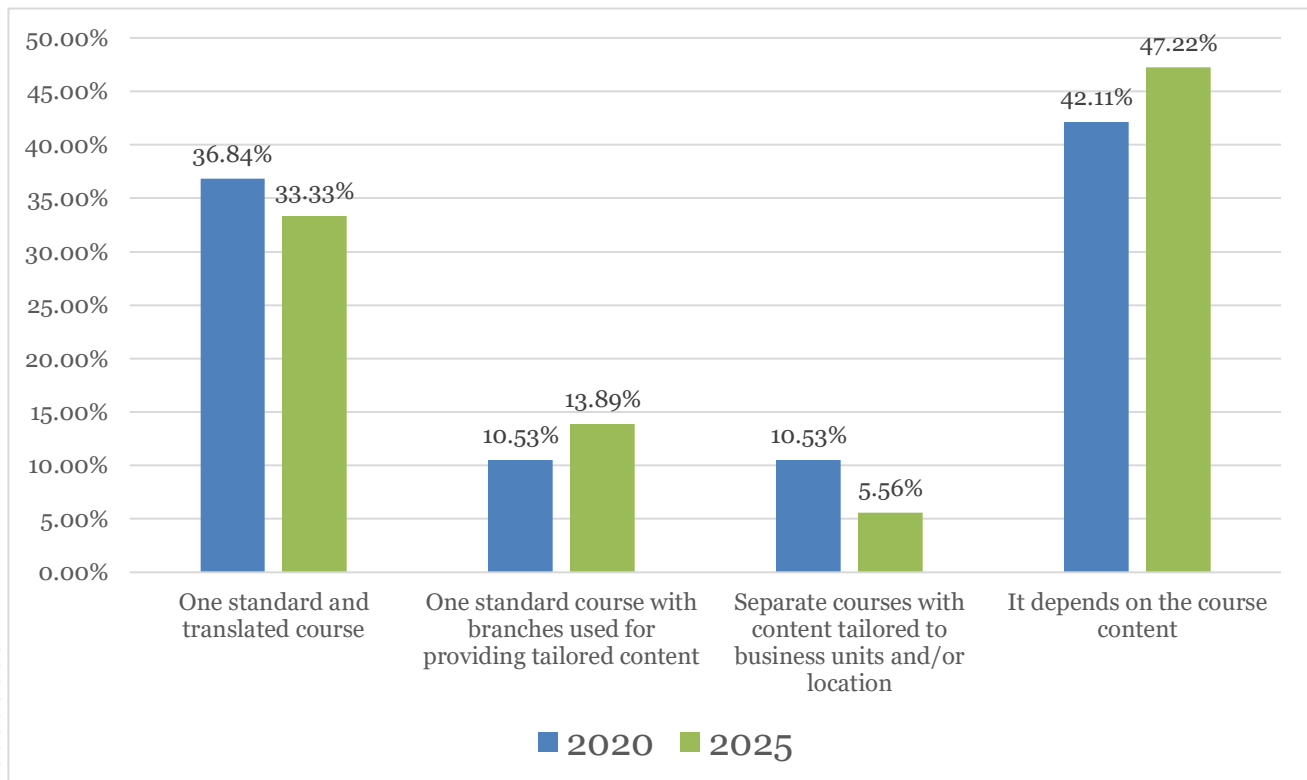
Comments:

- The Global Education team maintains a training plan, Internal Communication and Compliance Officers also have annual plans to disseminate knowledge and training.
- We include the first 3 options.
- We leverage the first three.
- It depends based on need and risk for global and divisions and affiliates.
- We also include a communications plan within the training plan.
- Formal communications, e.g. emails and intranet campaigns.
- N/A.

20. How does your company approach training courses that are assigned across multiple countries and business units?



Comparison Chart



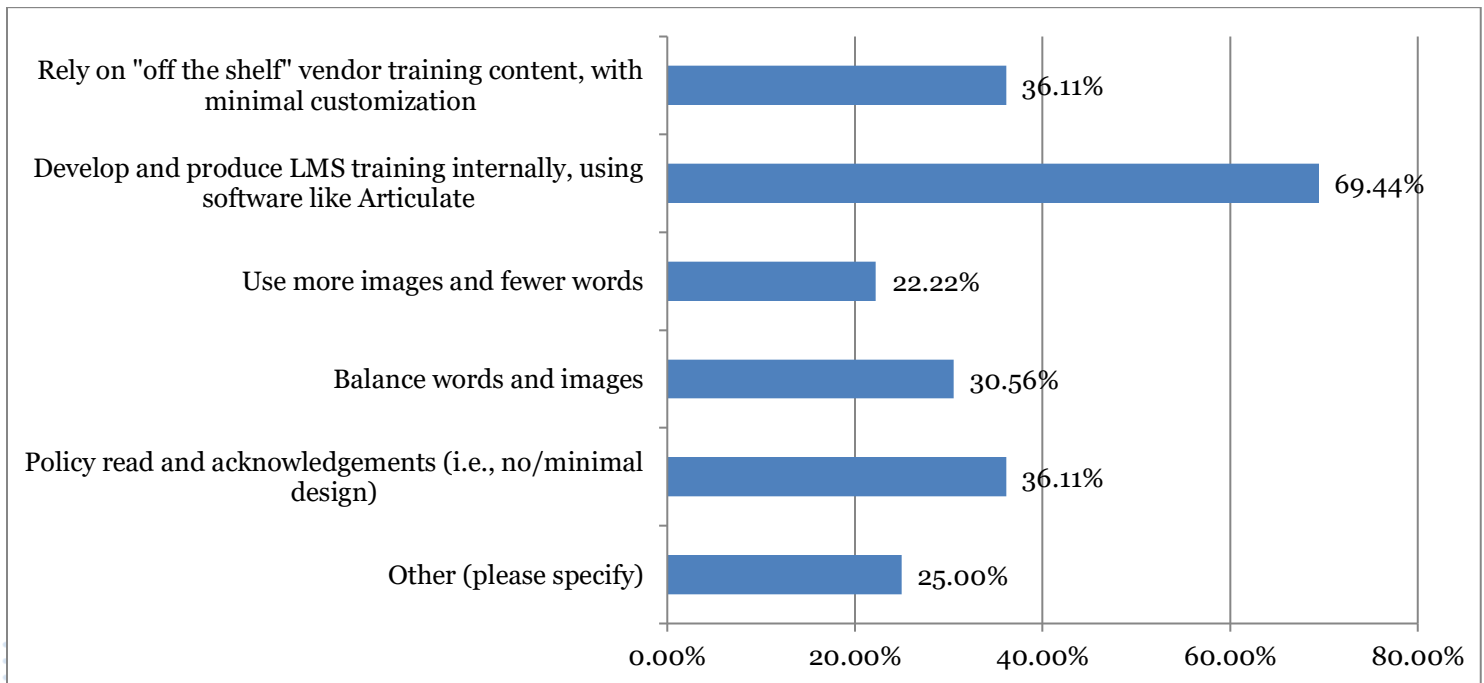
Comments:

- We have general training tied to our global policies and then the regional compliance teams can offer training for their regions if they have specific needs that are more restrictive than the corporate policies.

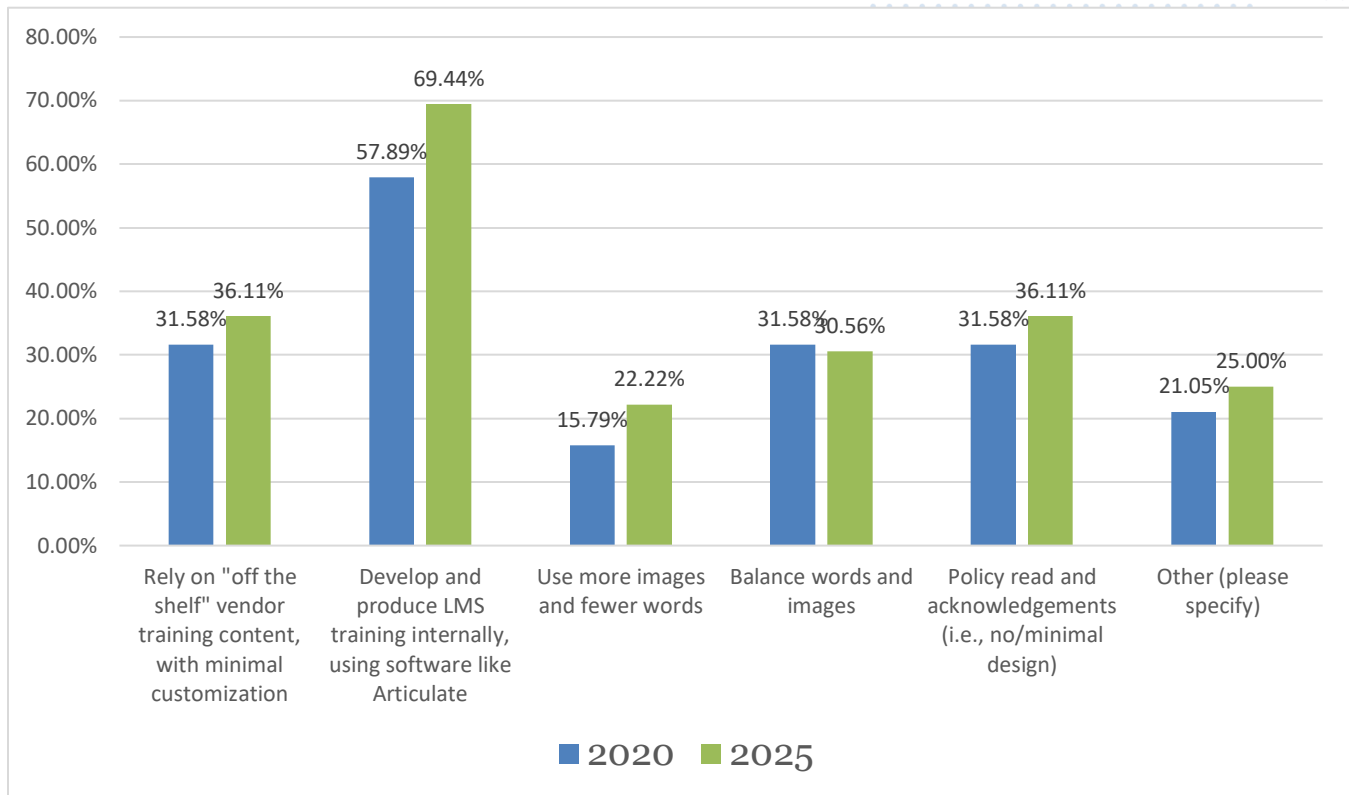


- In general, we have one global course for each topic, we only do targeted trainings if the content is meant for a specific audience (Privacy for HR, Privacy for Sales, etc.).
- We will tailor trainings based on rules and procedures in the countries and we translate the courses to the local language.
- We facilitate US-based training only, other countries/business units are managed by international counterparts.
- We mainly use a standard/translated course, but provide region/country-specific trainings on a more ad hoc basis.
- It depends based on need and risk for global and divisions and affiliates.
- Global content is typically translated into all relevant languages.
- We are in North America only. We apply the AdvaMed COE as our standards in US and Canada. Otherwise, this question is not applicable to our business - as our Canadian employees are trained similarly to our US employees. We are not global and have a single business unit.
- We are responsible only for the United States.
- Only responsible for North America.

21. Which of the below has worked best for your company in providing effective training for a multilingual workforce while managing costs and administrative effort? (Please Select All that Apply)



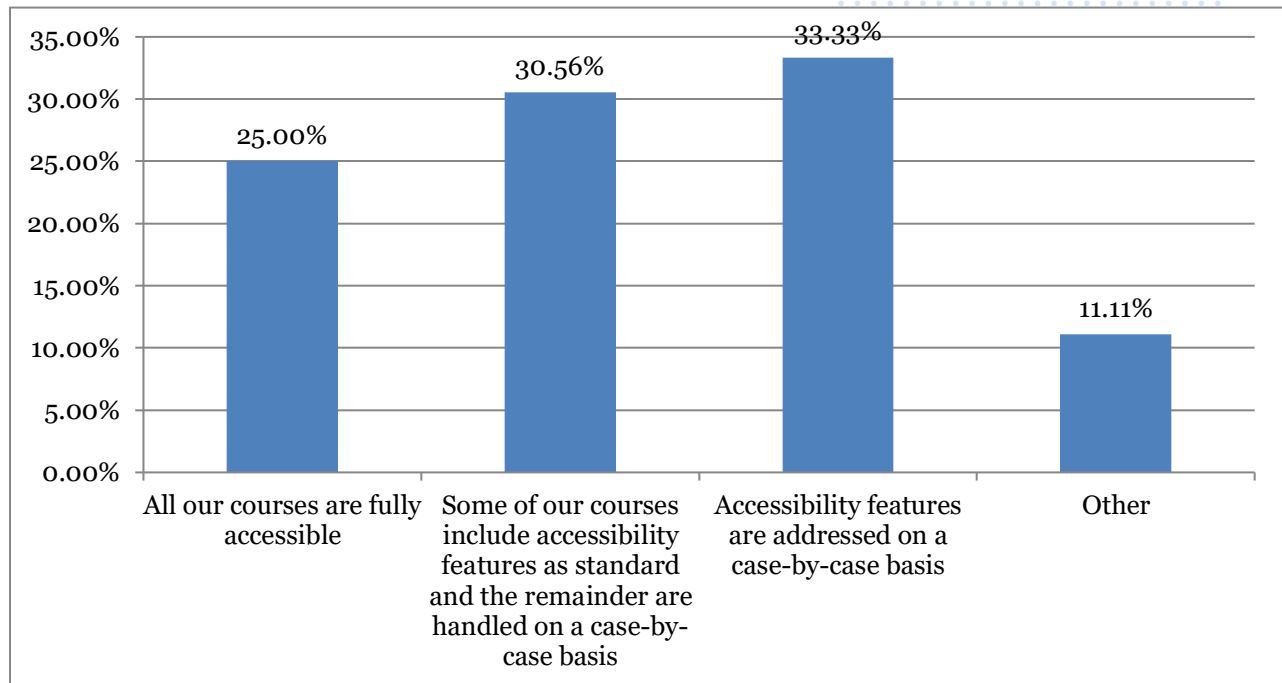
Comparison Chart



Comments:

- We also create highly customized materials in addition to some off-the-shelf from 2 vendor partners. All training is translated into 19 languages.
- We also utilize voice overs in trainings, keep it less than 30 minutes, translate into 9 or 18 languages depending on the topic.
- We take fewer words approach in our videos to keep translation costs down - utilizing VTT files only rather than on-screen text.
- We tried off-the-shelf content but found it to be too generic. We also include quizzes to test understanding.
- We also rely on vendor created courses that are a mix of off-the-shelf and custom content.
- Most training requires translation (internally/externally) based on topic and audience.
- We are in North America only and have our trainings in English only.
- Training is addressed in each country with translation services.
- Written content (to reduce the need for audio translations).
- We built core custom modules with a vendor.
- We translate courses as able.

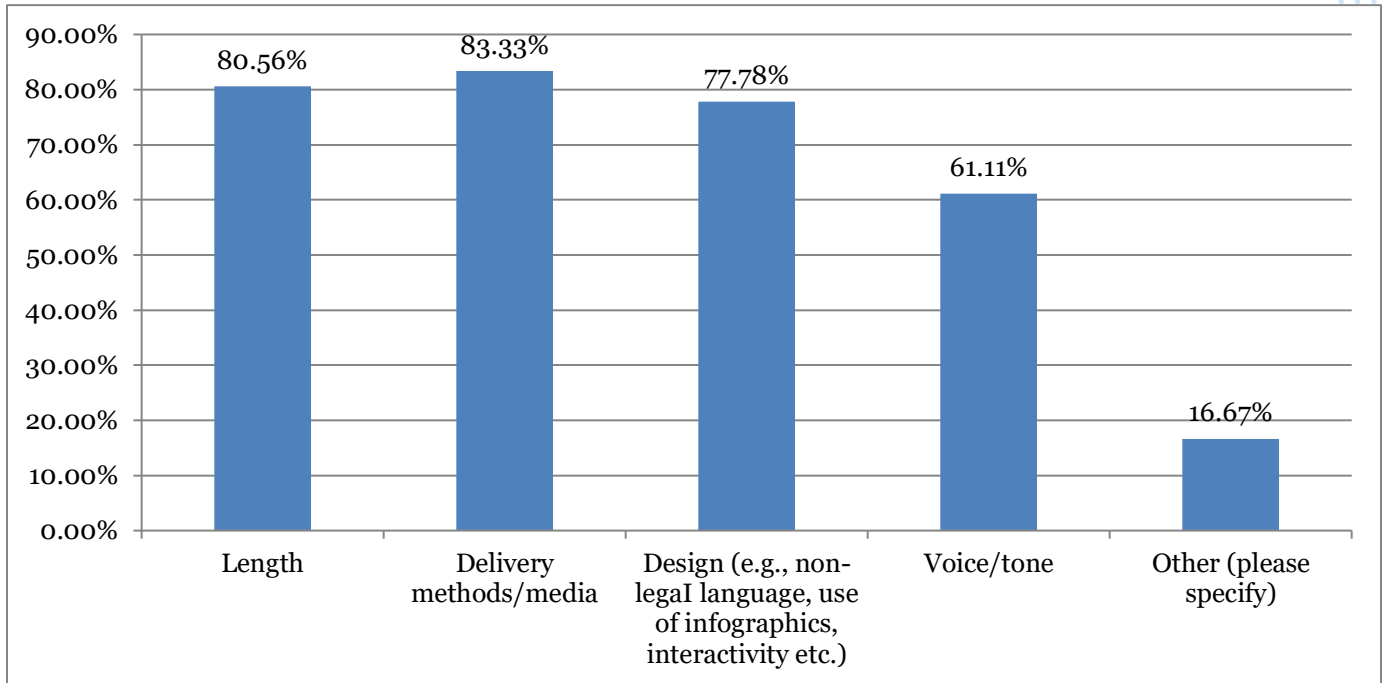
22. How does your company approach accessibility features in training design? (e.g., alt text for images, color contrast for readability, keyboard operability for navigation, etc.)



Comments:

- Courses purchased from vendors are more likely to include accessibility features, while courses developed in-house are less likely to include accessibility features.
- We make an effort to deploy courses that are accessible, and also handle on a case-by-case basis.
- Online courses are fully accessible, ad hoc courses are provided on demand.
- We do it for Canada and on a case-by-case basis. Area of continuous improvement.
- Managed by HR training development team (not compliance).

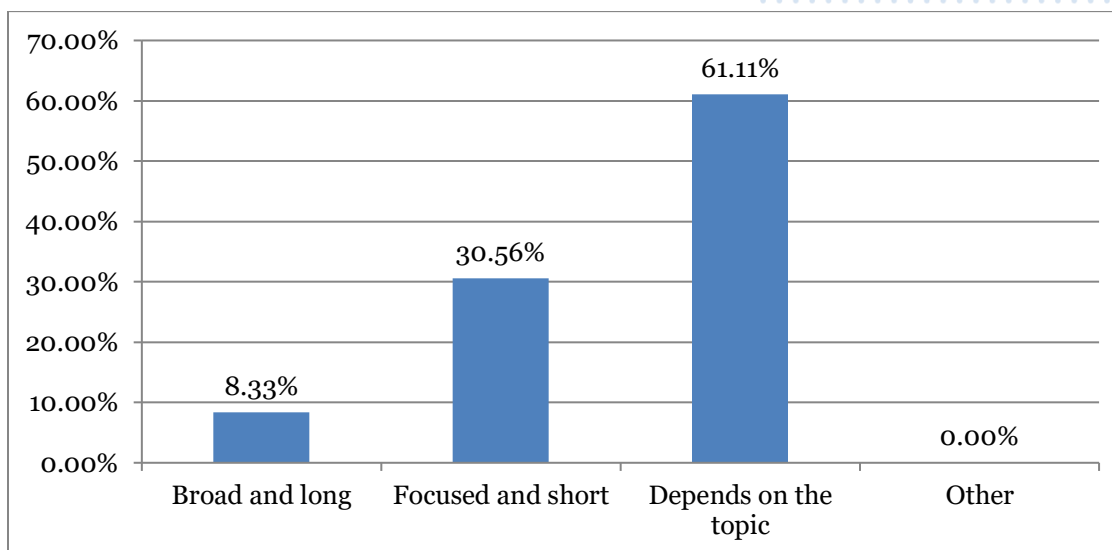
23. Which of the following elements are utilized to “reach” all different training audiences? (Please Select All That Apply)



Comments:

- Training is designed to address real-world scenarios faced by the target employees, and we gather user feedback via surveys at the end of courses.
- We use translations of content and voice-overs, in-person training if online option is not available (e.g., manufacturing).
- Centralized workstations for manufacturing employees.
- Audience-target.

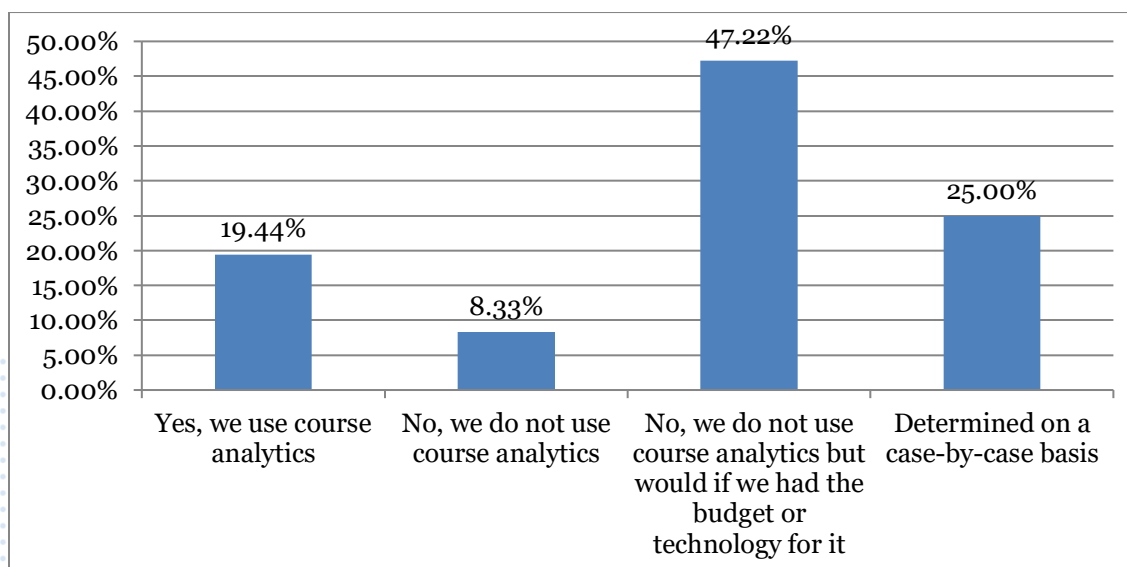
24. In general, are your company's trainings broad and long or focused and short?



Comments:

- New Hire training for Sales & Marketing staff and our annual all-staff COBC training are broad and longer, while other topics are covered with shorter, more focused trainings.
- Most are focused and short with the exception of key topics around Code of Conduct and HCP Engagements.
- Focused and short for Compliance training.

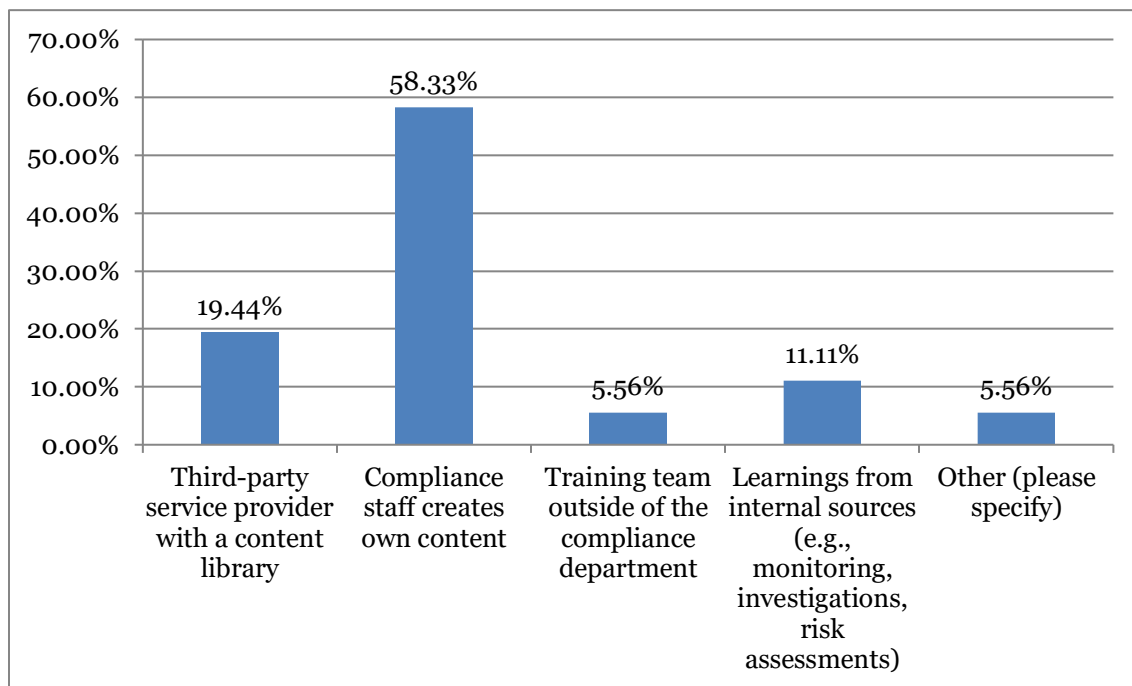
25. Does your company utilize course analytics to understand learning styles, goals, and performance gaps?



Comments:

- We use course data and end-of-course survey data to help make improvements to future iterations of the courses.
- We only utilize course analytics for courses purchased from vendors who have the functionality to analyze the data.
- We currently use analytics for test-out options for 5 courses that we are currently looking to evolve.
- Most online courses have course analytics capabilities.

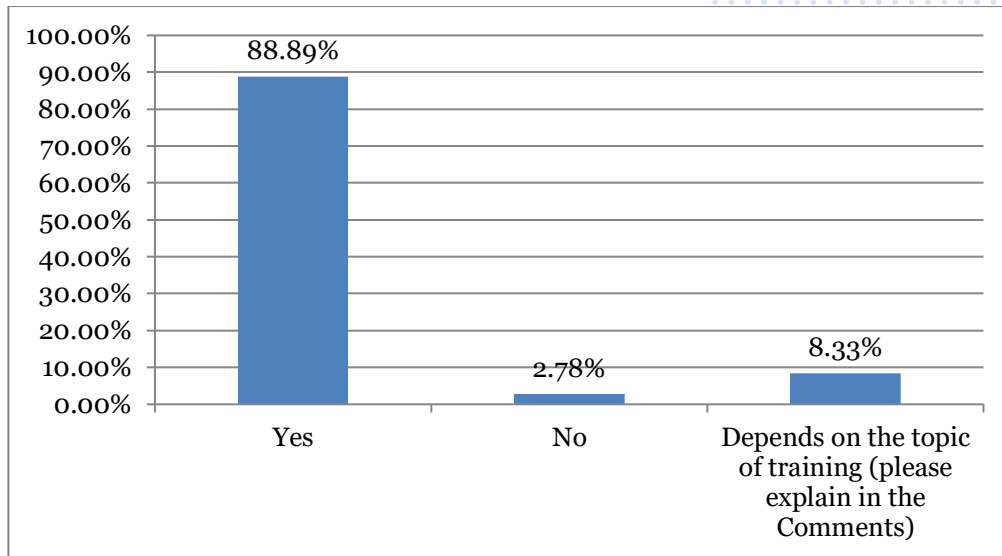
26. From where does your company primarily source compliance training content?



Comments:

- Default is for compliance to create new training material as needed but we do utilize third-party content (e.g., Navex) if able.
- We also work with our current provider to develop course content specific to our procedures and real-life scenarios.
- Also feedback from the business partners for the functions and business they support.
- Compliance staff creates, but we sometimes use/consult with outside consultants.
- Our content is primarily self-created, but we do use third-party training.
- Vendor assists with development of training content.
- Some training is developed with a third party.
- With support of third-party service provider.
- All of the above.

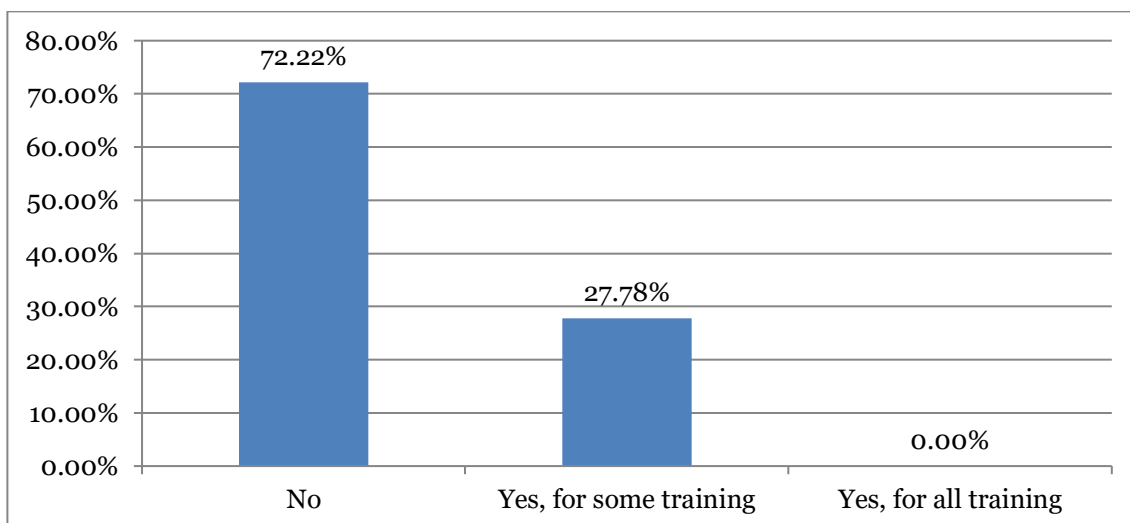
27. Is every employee required to complete all assigned training?



Comments:

- Commercial, Medical, and Neutral functions may all have different risk areas assigned. Also, manufacturing and production areas will vary.
- Employees are required to complete all trainings assigned to them; however, not all compliance trainings are assigned to all employees.
- We have all employee training, e.g. Code of Conduct and role-specific training, e.g., Sales and Marketing Policy.

28. Does your company offer "test out" options for certain trainings, to demonstrate proficiency and help save time?



2020 – 2025 Comparison

Responses	2020	2025
No	63.16%	72.22%
Yes, for some training	36.84%	27.78%
Yes, for all training	0.00%	0.00%

Comments:

- We have applied this model in the past, but it was burdensome to manage. We are considering how to use AI to reintroduce this approach.
- With interactive trainings, employees may test out of certain topics but cannot test out of the entire training.
- Our company offers "test down" options, not "test out".
- Employees have to review all of the content as our test may not cover every single topic.

29. If your company offers “test out” options for some trainings, how does your company select which trainings have a “test out” option (e.g., level of risk, overall performance across the company for a particular training)?

Responses:

4 Respondents noted test-out options selected based on level of risk. Some additional details below:

- It is based on level of risk and overall performance across the company for a particular training. Questions are intentionally difficult, and participants need to get 100% to test-out.
- Level of risk and the compliance trends specific to that topic.

2 Respondents noted test-out options selected on a case-by-case basis.

4 Additional Comments:

- High level trainings that are required annually e.g. our Code and Anti-bribery courses have test out options.
- On-line vs in-person/virtual, Investigations, Monitoring/Audit recommendations.
- Depends on the department and its evaluation.
- It depends on availability.

30. If your company offers “test out” options, what percentage do employees have to achieve in order to test out (e.g., 80% score or higher)?

Responses:

4 Respondents require 80% or higher. Some additional details below:

- 80 or 90% depending on training.



2 Respondents require 100%. Some additional details below:

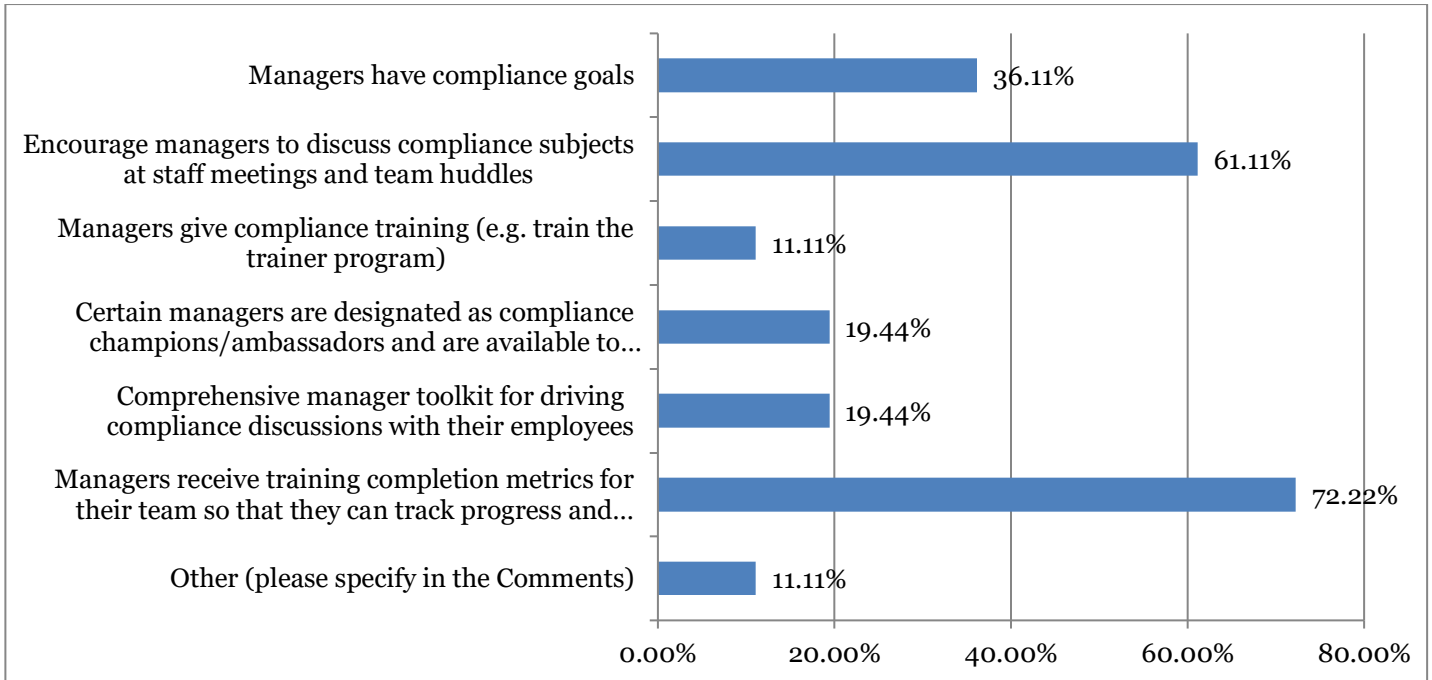
- 100% pass rate in order to test out of content. Courses are adaptive, so if they miss a question, they have to take the content related to that question.

1 Respondent requires 85%.

1 Respondent requires 75% or higher.

1 Respondent makes determination on a case-by-case basis.

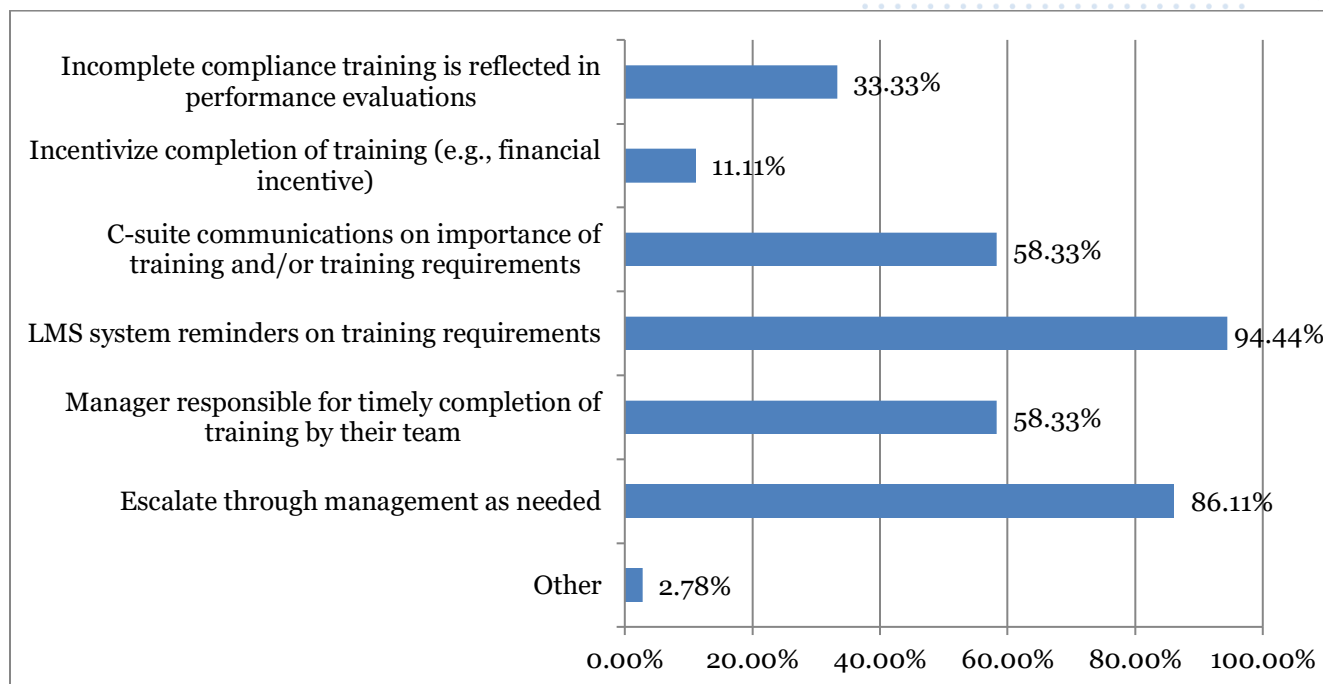
31. How does your department engage middle management to support compliance training with their teams? (Please Select All that Apply)



Comments:

- Managers come to the beginning of the training and reinforce the importance of compliance and ensure that their employees attend the training.
- Quarterly reports to manufacturing sites and to regional compliance leads to follow up in their regions or Business Units.
- Managers receive daily emails of overdue training for employees, which is done automatically through the LMS.
- All team members are assigned with a compliance training priority to complete these on time.
- Middle management ensures employees complete training by sending out reminders.

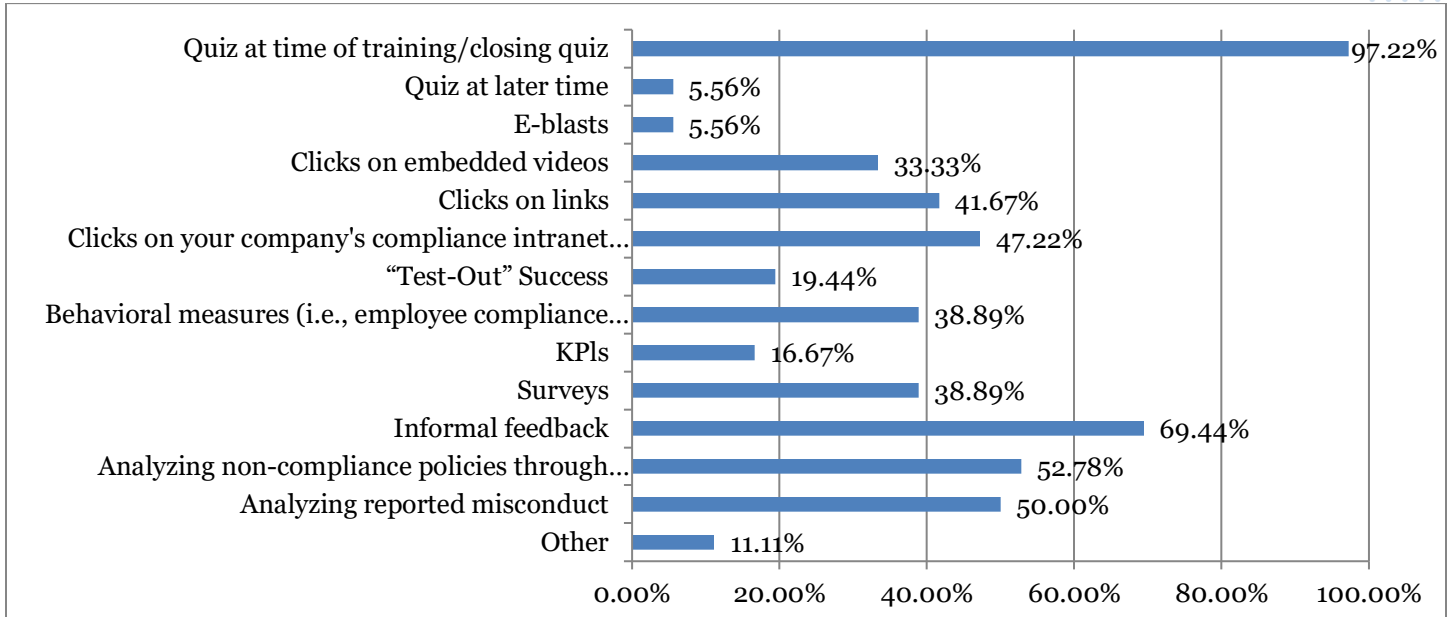
32. What mechanisms does your company utilize to advance/ensure completion of training? (Please Select All That Apply and Explain in the Comments)



Comments:

- Some regions have a negative bonus impact if a team member completes the compliance training after the due date.
- Executive management reviews training completion rates, by leader, on a weekly basis.
- Compliance may send out reminders when necessary.

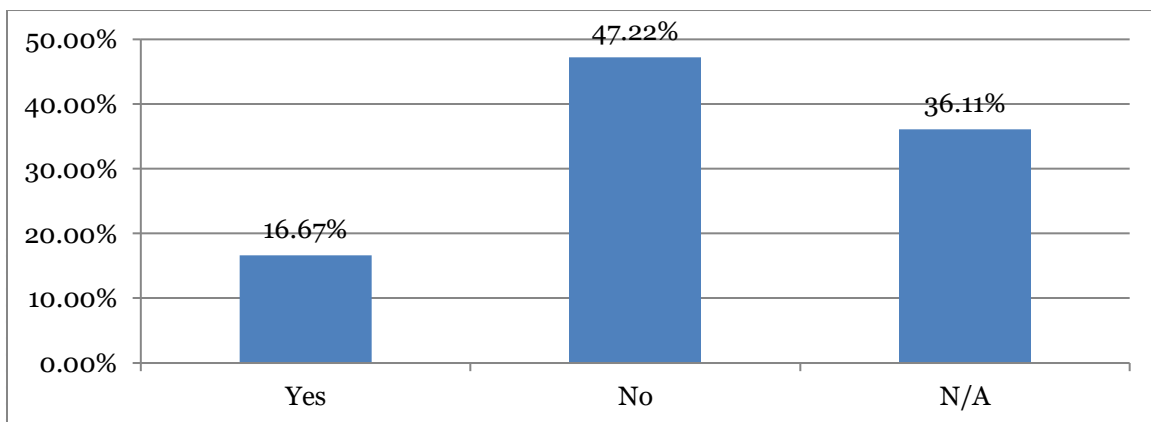
33. Which of the below methods does your company use to track/measure the effectiveness of your training? (Please Select All that Apply)



Comments:

- We collect 'sentiment' feedback on online courses via the LMS and review periodically and make necessary course edits.
- An example of behavioral would be improved compliance trends.
- We intend to use a survey this year.
- Feedback given via LMS tool.
- End-of-course survey.

34. If your company monitors whether employees fail knowledge checks at the end of training, does your company use that data to inform your risk assessment?



Comments:

- We track completions of the training.



35. If your training program utilizes vendors for any service (e.g., compliance training content, off-the-shelf trainings, day-to-day training program administration), please share recommendations/feedback on vendors used:

Comments:

- We have started to work with a vendor on off-the-shelf content development with a successful launch of two of our flagship courses (Code and ABAC training). Currently contemplating to develop more custom-made content with the vendor. Also, we are looking at vendors to create short explainer videos/animations as well as potentially podcasts.
- (1) Learning Pool – We use customized services & content; analytics on course performance is advanced. (2)LRN – we use semi-custom off-the-shelf content; some use of analytics. (3)Broadcat – supplemental communication materials; very topical; easy to customize.
- We use LRN to build custom content and use their off-the-shelf content. They have a large library of content which meets our current needs.
- We think LRN, Learning Pool and SAI360 have good content. We use Articulate 360 for custom course development.
- We create all our own trainings in-house using Vyond and Articulate.
- Articulate: positive experience but requires self-learning to fully use the tool.
- Our organization currently uses Skillsoft training, which has an engaging, scenario-driven approach that helps learners apply concepts in real-world contexts. In the past, we've used Open Sesame, and they have a large library of compliance content.
- We currently use Diligent (Compliance Wave) for our online training course content, but we are actively looking into switching to a different vendor for course content.
- Navex used for a few trainings and a custom-built from Dovetail consulting. Navex has been good, the Dovetail is custom built and needs to be refreshed.
- Navex has good content, and they seem to refresh annually. They also allow increased customizations via course customizer tool which is helpful.
- Navex courses are relevant, customizable and user friendly. SuccessFactors for LMS.
- Sublime Media has been a good partner for completely custom content that we own in perpetuity.
- Most training is developed in-house. Have used One Trust and have been satisfied with them.
- Different vendors are used for different topics.
- We use outside counsel for executive and legal training focus on healthcare compliance topics.
- LearningPool is a vendor we are currently using.
- Used both LRN and Learning Pool.
- ComplianceWire, Learning Pool.
- Navex, Articulate 360 Rise.
- LRN, Simpleshow, ELB.
- Cornerstone. Adequate.

- Potomac River Partners.
- Rethink.
- Litmos.

