

# Global Business Conduct Policy

**Version 1.0**  
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## Purpose

MiniMed is committed to interacting with all Healthcare Professionals (HCPs), Healthcare Organizations (HCOs), and anyone with a material influence over the use or purchase of MiniMed Technologies with integrity and in compliance with all applicable laws, regulations, and industry codes of conduct.

This policy outlines how MiniMed ensures Employee interactions with HCP/HCOs are ethical, compliant, and aligned with legal and industry standards or requirements.

## Scope

This policy applies to all MiniMed employees regardless of citizenship, the country in which they work, or their level in the company.

The Global Business Conduct Policy and related policies and procedures ("BCS") regulate interactions between Employees and any individuals or entities who prescribe, purchase, lease, recommend, use, or arrange the purchase and lease of MiniMed Technologies (HCPs/HCOs). For purposes of this policy, Healthcare Professionals includes:

- Healthcare providers, including but not limited to physicians, non-physician practitioners, medical fellows, medical students, pharmacists, or healthcare providers who are government officials;
- Any Healthcare Organization (HCO) staff member or HCP relative, if in a position to influence the decision to purchase or use MiniMed Technology; and
- Any other individual or entity in a capacity to directly recommend or materially influence the purchase or use of MiniMed Technologies.

## Policy Statement (Details)

MiniMed has a responsibility to ensure that interactions with HCPs/HCOs are conducted in an ethical and compliant manner. MiniMed will not attempt to inappropriately influence HCPs/HCOs through an improper inducement. This means that Employees must not offer or provide (directly or indirectly) an

improper payment or anything of value to HCPs/HCOs as a reward for prior business or to encourage the future purchase or use of MiniMed Technologies.

The General Provisions section and 9 Standards outline how MiniMed ensures Employee interactions with HCPs/HCOs are ethical, compliant, and aligned with legal and industry standards or requirements.

- General Provisions: Requirements for every HCP/HCO Interaction
- Standard 1: HCP/HCO Consulting Arrangements
- Standard 2: MiniMed -Conducted Programs and Meetings
- Standard 3: Grants, Donations, and Sponsorships
- Standard 4: Joint Education and Marketing Program
- Standard 5: Travel, Lodging, Meals & Other Forms of Business Courtesies
- Standard 6: Meals and Refreshments
- Standard 7: Provision of Health Economics and Reimbursement Information
- Standard 8: Provision of Products or Equipment at Reduced Prices or No Charge
- Standard 9: Education and Technical Support in a Clinical Setting

Employees must comply with this policy unless there is a more restrictive law, regulation, rule, industry code, or MiniMed policy applies. If a more restrictive requirement exists, then Employees must comply with the more restrictive provision. For many Standards, additional global or regional policies, procedures, or guidance apply. Employees are responsible for knowing and understanding the rules that apply to their interactions with HCPs/HCOs. Additionally, managers must supervise their direct reports' compliance with these requirements. Employees should consult with their manager or Compliance/Legal team for questions about this policy or a proposed interaction with HCPs/HCOs.

Exceptions.

MiniMed strongly discourages exceptions to the BCS. While the following Standards govern most situations, there might be occasions where a proposed interaction is appropriate even though it appears to conflict with the BCS. In these rare cases, a Compliance leader, as applicable, may grant an exception via the Global BCS exception process if the proposed interaction is lawful and ethical. Employees seeking an exception must engage with their Legal & Compliance partner.

Investigations and Misconduct.

Employees must be candid and cooperative during any investigation, BCS-related or otherwise, including being truthful and forthcoming during any review of a potential policy violation. This is consistent with the Global Code of Conduct. MiniMed may discipline an Employee, up to and including termination, if the Employee violates this policy or directs or encourages another to do so. Each Employee is responsible for promptly bringing violations and suspected violations of this policy to the attention of MiniMed through management, their regional Compliance/Legal team, the Human Resources team, or by using the Voice Your Concern confidential reporting mechanism.

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## Policy Details (General Provisions & Standards)

### General Provisions

#### A. Every Interactions Must Be for Legitimate Business Purposes

MiniMed has a responsibility to ensure that interactions with HCPs/HCOs are conducted in an ethical and compliant manner. MiniMed will not attempt to inappropriately influence an HCP through an improper inducement. This means that Employees will not offer or provide (directly or indirectly) an improper payment or anything of value to an HCP/HCO as a reward for prior business or to encourage the future use or purchase of MiniMed Technologies. Anything of value provided directly or indirectly to reward past purchases or to influence an HCP/HCO to purchase or use MiniMed Technologies in the future is not a "Legitimate Need" and is prohibited.

#### B. Items of Value Must Be Valued Appropriately, Documented & Traceable

Payments, services, or grants to HCPs/HCOs or contracts to supply MiniMed must be documented in writing, based on Fair Market Value, and approved in advance. In addition, any payments or benefits provided to HCPs/HCOs must be reported in a timely and traceable manner.

##### 1. *Fair Market Value*

When MiniMed transfers value to an HCP, it must represent Fair Market Value ("FMV") for the goods or services provided. FMV is the market or objective value of the goods or services at the time the good or service is provided.

##### 2. *Timely Reporting.*

Employees must report payments, and all other benefits provided to or on behalf of HCPs/HCOs to MiniMed in a timely manner (as defined by local regulations) using the applicable Finance reporting system and attributing them to individual HCPs accurately and completely.

##### 3. *Traceable.*

When an HCP provides goods or services directly to MiniMed, MiniMed must pay the HCP/HCO with traceable company funds (i.e. by MiniMed check, MiniMed credit card, or wire transfer from a MiniMed account). Employees must not pay an HCP/HCO in cash, by personal check, or by personal credit card.

#### C. Additional Rules Apply When Engaging an HCP/HCO From Another Country

MiniMed must comply with the laws and regulations of the country where an HCP is licensed to practice or where they work, regardless of where they interact with MiniMed. When you plan an interaction with

an HCP from another country, you must consult with MiniMed Legal and/or Compliance on the requirements applicable to that HCP.

D. Approvals

You must not make commitments to HCPs until you obtain all required approvals according to the applicable policy/system. You must follow the appropriate approval process regarding each interaction and expense. Certain roles at MiniMed are subject to additional restrictions or specific rules (e.g. limits on how sales personnel may be involved in decisions on Clinical Research).

E. Endorsement of HCPs/HCOs

You may not personally endorse an HCP/HCO. This includes recommending or suggesting a specific individual or attesting to the quality of a specific individual's services or otherwise characterizing a physician/customer or their work.

### **Standard 1 - HCP/HCO Consulting Arrangements**

MiniMed engages HCPs/HCOs to provide a wide range of valuable, bona fide services to support MiniMed's business needs.

A. HCP Consulting Arrangements.

MiniMed relies on HCPs/HCOs for various consulting services (collectively, "Consulting Arrangements"), including:

1. Advisory Services, such as participation on advisory boards or in focus groups and market research.
2. Clinical Consulting, such as serving on a clinical study oversight committee like an adverse events adjudication committee ("AEAC") or a data safety monitoring board or serving as medical monitor for a clinical study.
3. Pre-Clinical Consulting, such as developing or advising on the protocol or design of Pre-Clinical Research.
4. Product Development Consulting, such as providing input on the development of a new or enhanced MiniMed Technology, product usability feedback.
5. Training and Education, such as MiniMed Technology training, sales training, proctorships, speaking engagements, patient education and content development.

To engage an HCP for a Consulting Arrangement, the Employee accountable for the Consulting Arrangement must have:

1. A Documented Business Purpose for the Consulting Services. You must document an appropriate business purpose for the consulting work and the need for using HCPs to complete this work before

engaging an HCP. Designing or creating a Consulting Arrangement to generate business from that HCP is not an appropriate purpose for consulting work and is a clear BCS violation.

2. Qualified HCPs. You must select HCPs based on their qualifications, expertise, and capacity to provide the services needed for the Consulting Arrangement. While the qualifications may include experience with, usage of, or familiarity with a MiniMed Technology, you must not select HCPs to reward their past usage or to unlawfully induce them to provide future business to MiniMed.

You must not engage more HCPs than necessary to conduct a specific Consulting Arrangement. You should assess the frequency of using an HCP for repeat Consulting Arrangements to confirm there is still a Legitimate Need to use the HCP and to ensure the aggregate payment will not unduly influence the HCP.

Sales personnel may not unduly influence decisions related to the selection of HCPs in hiring consultants or the award (both in terms of recipient and amount) of research, grants, or donations. Follow regional policies for how sales personnel may be involved.

3. A Written Agreement. There must be a written agreement ("Consulting Agreement") that:
  - Describes the appropriate purpose (Legitimate Need) for the consulting work and the need for use of an HCP;
  - Specifies all services that the HCP/HCO will provide, the terms of the agreement, the payment rate or amount, and any MiniMed obligation to reimburse for travel, lodging, meals, and other expenses relating to the consulting activity; and
  - Executed by both MiniMed and the HCP/HCO before the start of the services.
4. Appropriate Compensation. MiniMed determines appropriate compensation rates based on Fair Market Value (FMV) for the services sought under the Consulting Agreement in the country where the HCP resides or practices or the Healthcare Organization is located ("FMV Rates"). The FMV Rate is set using objective criteria such as the HCP's specialty, years and type of experience, geographic location, practice setting, industry standards, and an evaluation of the types of services performed (taking into consideration effort, length of time, and the unique expertise needed for the service or activity.)

When Employees hire an HCP as a consultant, MiniMed may pay for reasonable and actual expenses incurred by the HCP that are necessary to carry out the consulting services, such as costs for travel, lodging, and modest meals. Please review the Global Travel and Expense Policy to understand what expenses are appropriate.

Employees must not hire HCPs for general services or services on an as-needed basis with payment prior to the receipt of services (e.g. retainer agreements). Employees must confirm that the services

subject to the Consulting Agreement have been provided before paying the HCP. Finally, Employees must not perform any duties for which an HCP has been contracted and paid to carry out.

B. Product Development Services.

The following additional requirements apply to Consulting Arrangements for services provided by an HCP or group of HCPs to support the joint development of a new/enhanced MiniMed product or therapy where the HCP contributes intellectual property important to the design of the MiniMed Technology. ("Product Development Arrangements.")

Product Development Arrangements may be initiated when the following requirements are met:

1. A Documented Business Need for Product Development Services. You must document an appropriate business need for design and development services. Employees must assess whether the services required can be performed under an hourly consulting services arrangement in lieu of a product development arrangement.
2. Design HCP Qualifications. HCPs participating in a Product Development Arrangement should have previous design experience, familiarity with similar systems (both MiniMed and competitive), significant experience with the disease state or condition for which the product is being developed, and an understanding of the capabilities and experience of the average HCP in treating the condition. Diversity across the development team is also useful in creating a robust design and broad applicability of the solution.
3. Novel, Significant, or Innovative Contribution. Payments may be triggered when HCPs (either individually or part of a team) make a novel, significant, or innovative contribution to the development of a product, technology, process, or method. Such contributions may be in the form of trade secrets, know how, patents, or patent applications. The contributions from the HCPs must be documented and exist in the final commercial MiniMed Technology where MiniMed can demonstrate that the contribution provides a benefit to the design of existing products or technologies.
4. No Excessive or Duplicate Payments. Product Development Arrangements may involve alternative payment arrangements such as royalties (e.g. a percentage of product sales) or milestones (e.g. payment upon the achievement of certain development milestones). You must document these payment arrangements in a written agreement ("Product Development Agreement.") These payment models must consider the total benefit to MiniMed over the course of the product sales model and fairly compensate HCPs for their contributions of intellectual property. The key principle is that MiniMed must not pay for this intellectual property twice. Therefore:

- a. Royalty Payments. Product Development Agreements with royalties should (1) include a cap on the total amount of royalties that MiniMed may pay to the HCP over the life of agreement; and (2) ensure that payments an HCP receives for Product Development Arrangements provided during the development of the product or therapy are deducted from any subsequent royalty payments owed for the same product or therapy.
  - b. Milestone Payments. Milestone payments should be risk adjusted to account for the risks associated with bringing MiniMed Technologies to market.
5. Avoid Undue Influence. You must calculate payments for Product Development Arrangements based on factors that preserve the objectivity of medical decision-making and avoid the potential for improper influence. This includes limiting the ability of the HCPs to earn royalties from sales of the products in any HCO where the HCP practices or has influence over purchasing or decisions about the use of MiniMed Technologies. MiniMed also limits the ability of HCPs with Product Development Agreements to participate in clinical trials.
  6. No Promotional Requirement. Product Development Agreements must not condition payments on either (1) a requirement that the HCP purchase, order, or recommend any MiniMed Technology or any product or technology products as a result of the Product Development Arrangement; or (2) a requirement to market the product or technology upon commercialization.
- C. Arrangements for Clinical and Pre-Clinical Research.

Clinical (human subject) and Pre-Clinical (bench, animal, or cadaver) research arrangements should (1) be driven and managed by the appropriate scientific function; (2) fulfill a clear and documented legitimate research purpose related to MiniMed strategy; and (3) not be inappropriately influenced by sales personnel. In addition to the requirements listed above (II.A), the following requirements apply to Consulting Arrangements involving clinical studies and research.

1. *Clinical and Pre-Clinical Research Arrangements with an HCO.*

MiniMed generally enters research arrangements directly with an HCO for MiniMed Sponsored or Collaborative Research involving Clinical and Pre-Clinical Research. A written agreement with the HCO is required to document the payment to the HCO (a "Clinical Research Agreement"). Compensation for the research arrangements is based on the costs associated with the funding of the research (e.g. for study execution activities based on local FMV Rates and/or infrastructure costs, equipment, or material costs based on local FMV Rates).

A written protocol is required for Clinical Research. Pre-Clinical Research needs a protocol, research plan or written procedures.

No Clinical or Pre-Clinical Research may occur without being approved by the responsible ethical review board at the HCO if required (for example, for Clinical Research review by an institutional review board and for Pre-Clinical Research review by an institutional animal care and use committee). If permitted by regional policy, limited consulting services (e.g. research design or protocol development) may be included in an agreement for Pre-Clinical Research. Employees should consult Legal & Compliance on the requirements for consulting services for Pre-Clinical Research. All MiniMed -sponsored research must adhere to the executed research agreement and to any applicable local laws.

2. *Clinical Consulting Arrangements with an HCP.*

Clinical Consulting Arrangements may include activities related to the conduct of Clinical Research or Pre-Clinical Research such as developing or advising on the protocol or design of the research but does not include the conduct of any activities covered under the Clinical Research or Pre-Clinical Research Arrangements with an HCO. In these situations, you must create a separate written agreement with the HCP meeting the requirements under Section II. A. The agreement must differentiate the work done under any agreement with the HCO for the same research. There must be no overlap in the scope of services between the two sets of agreements and no duplication of compensation.

3. *Scientific Publications.*

HCPs and Employees who serve as authors, contributors, editors, or reviewers for peer-reviewed publications must follow internationally accepted standards for authorship, contribution, and disclosure of financial interests such as the International Committee of Medical Journal Editors. MiniMed prohibits compensation for publication writing or editing activities to HCPs.

4. *HCPs with Product Development Agreements.*

HCPs with Product Development Agreements:

- May participate as investigators for clinical feasibility or post-market surveillance studies required by regulatory authorities only with approval from their institutional review board regarding research subject protections;
- Must not participate as investigators in any MiniMed -sponsored clinical study activities regardless of whether the HCP's invention is involved in the study; and
- Must not participate on any data safety monitoring board or adverse events adjudication committee for products that incorporate their inventive contributions.

## **Standard 2 - MiniMed -Conducted Programs and Meetings**

A. MiniMed Training and Education Programs ("Medical Education").

MiniMed may organize instruction, education, or training sessions on the safe and effective use of MiniMed Technologies and role of MiniMed Technologies in the continuum of care. Medical Education programs may include experiential product training and didactic education on the approved use of MiniMed Technologies and related services and support programs. Educational content must be consistent with the regulatory approval for the product and should not include discussion of uses of MiniMed Technologies that are inconsistent with approved labeling. Only MiniMed Employees and/or faculty who have relevant experience or qualifications may provide training on MiniMed Technology.

All Medical Education events must meet the travel, lodging and meals requirements and any additional limitations in the applicable country or region. To conduct a Medical Education event, Employees must meet the following requirements:

1. *Agenda.*

Training and education must constitute a substantial majority of the program on each day of the program. The agenda must not include activities that would constitute entertainment or recreation.

2. *Setting.*

Conduct live and virtual training and education programs in settings that are conducive to the exchange of scientific or educational information and appropriate under any local laws or regulations. Appropriate settings may include the HCP's own facility, clinical, educational, or other settings such as hotels, conference centers, or other suitable meeting facilities. Hold programs involving experiential technical training and instruction on MiniMed Technologies (e.g. a cadaver lab) at MiniMed facilities surgical training facilities, medical institutions, laboratories, or other appropriate facilities.

3. *Attendees.*

All HCP Attendees must have a Legitimate Need to learn the information presented at the Medical Education program. HCPs or guests who do not individually have a Legitimate Need to learn the content must not attend Medical Education programs.

B. Business Meetings.

Business Meetings are meetings between you and an HCP to discuss product features, instructions for use of MiniMed Technologies, sales terms, contracts, coding and reimbursement, patient access to therapies, and other scientific, educational, or business topics relevant to MiniMed. You may conduct Business Meetings with HCPs to have bonafide scientific, educational or business discussions. Business Meetings in conjunction with entertainment or for the primary purpose of socializing or building relationships are not allowed.

1. *Setting.*

You must hold Business Meetings at locations, settings, and times conducive to genuine scientific, educational, or business discussions. Plan interactions in the location where most or all HCP Attendees live or work, unless there is a Legitimate Need to hold the meeting elsewhere and reimbursement for travel and lodging is permissible in the applicable country or region.

2. *Attendees.*

Each HCP in attendance must have a Legitimate Need to attend a MiniMed Business Meeting. Guests who do not themselves have a Legitimate Need to participate in a Business Meeting should not attend.

3. *MiniMed Facilities.*

You may hold Business Meetings at MiniMed facilities (e.g. manufacturing, research and development, or learning labs) when there is a Legitimate Need to bring the HCP to the specific location. Plant tours and other such product or manufacturing-oriented Business Meetings with HCPs must follow applicable local procedures approved by Legal & Compliance team.

4. *Meals and Refreshments Provided with Business Meetings.*

You may conduct a Business Meeting over a meal, but if you do, you must attend and lead the discussion throughout the business meal. You are expected to use prudent judgement related to the need and frequency of providing modest, occasional, and reasonable meals and refreshments to an HCP.

### **Standard 3 - Grants, Donations, and Sponsorships**

MiniMed may donate money or MiniMed Technology for appropriate educational, scientific, or other charitable purposes. You must not make monetary or product donations:

- To individual HCPs;
- To influence the judgment of an individual HCP;
- As a reward for past purchases or to induce the future purchase of MiniMed Technologies; or
- During a period restricted by local tendering or other laws and regulations (if applicable and known).

All funding decisions for grants, donations or sponsorships must be based solely on the merits of the request. Reviews should be conducted under an arm's length process. You must follow regional procedures to obtain required pre- approvals and document in writing the support for giving grants, donations, and sponsorships. All payments must be tracked according to the applicable finance policy and reported to Compliance as need to compliance with transparency reporting requirements.

MiniMed must not pass along any benefits to an HCP that MiniMed receives in exchange for its support, including for educational or charitable purposes (e.g., receipt of a badge for access to the conference or tickets to charitable events, such as galas or golf outings).

A. Third-Party Medical Conferences and Other Programs ("Third- Party Programs").

MiniMed has an interest in building awareness and understanding of its products and related disease states through support for third-party scientific forums. MiniMed may support such medical conferences, professional meetings, and other similar events through educational grants and Commercial Sponsorship. Any HCP permitted travel, lodging, or meals that is sponsored by MiniMed must meet the requirements of this policy.

1. *Supporting Third-Party Programs Through Educational Grants.*

MiniMed may support independent educational, scientific, and policy-making conferences and professional meetings if they:

- Promote scientific knowledge, advance the practice of medicine, or enhance the delivery of effective healthcare;
- Generally recognized and respected within the relevant professional or medical community;
- Relate to MiniMed 's business, MiniMed Technologies, or a disease state in which MiniMed has an interest; and
- Have faculty and content selected at the sole discretion of the conference organizer.

a. Grant Recipient.

MiniMed may provide grants to (a) conference organizers to reduce overall conference costs, sponsor attendance by HCPs-in-training or those in need of support, defray faculty costs and expenses, or support modest meals or receptions; or (b) to a healthcare institution, professional association, foundation, training institution, or other third party permitted by local policy to enable HCPs to attend a third-party conference or professional meeting. When providing support to defray the costs for HCPs to attend a Third-Party Program, you may not select or control the selection of which specific HCP receives the support.

b. Adherence to Program Standards.

MiniMed must adhere to all standards established by the Third-Party Program organizer or the third-party accrediting the program. In the absence of such requirements, you must appropriately disclose when and how MiniMed provided support and must follow the Third-Party Program organizer's requirements regarding selection of faculty. If expressly requested by the Third-Party Program organizer, you may recommend faculty, categories of

attendees, or comment on the program content. However, you must not inappropriately influence the organizer about the choice of individual speakers, attendees, or content.

c. **Programs Happening in Other Countries (Cross Border Events).**

Grants originating in one country provided to Third-Party Programs held in a different country require review and approval by Legal & Compliance team.

2. *Hosting a Satellite Symposium.*

A congress or organization may offer MiniMed the opportunity to host a Satellite Symposium in conjunction with a Third-Party Program. Unlike a MiniMed -organized Medication Education program where MiniMed controls the faculty, content, and selection of attendees, MiniMed may only control the faculty and content in a Satellite Symposium (i.e., the event is open to conference attendees based on the criteria set by the Third-Party Program organizer). The Satellite Symposium is subject to the Third-Party Program organizer's application and approval process. Even though such an event may be listed on the Third-Party Program's agenda and promotional materials, these are considered MiniMed -sponsored events and MiniMed must appropriately disclose its sponsorship when promoting the events. You may not structure a Satellite Symposium, arrange a Consulting Agreement for a Satellite Symposium, or arrange to cover Satellite Symposium's faculty costs in such a way that circumvents the prohibition of direct sponsorship.

a. **Consulting Agreements for Faculty of Satellite Symposium**

You may engage an HCP to serve as a bona fide faculty member on its behalf with an appropriate Consulting Arrangement of this policy. If payment is required by the Third-Party Program organizers, the Consulting Arrangement may include covering the HCP's relevant registration fees. Under this situation, the registration fees must be limited to the time necessary to speak at the Satellite Symposium. MiniMed must not structure this Consulting Arrangement to circumvent the rules prohibiting direct sponsorship to Third-Party Programs.

3. *HCP Travel & Expense Incurred in Conjunction with a Third-Party Program*

Unless otherwise allowed in this section, MiniMed may not directly sponsor an HCP to attend a Third-Party Program. This means that you must not directly book travel/lodging or directly pay the costs for HCPs to attend or speak at a Third-Party Program. Any travel expenses or business courtesies must be provided following the Global Travel & Expense Policy.

a. **MiniMed Sponsored Training & Education Event or Business Meetings**

You may pay the incremental accommodation or other expenses of HCP Attendees for expenses associated with attending the MiniMed Sponsored Training & Education

Activities or Business Meetings even when those events take place, during, around, or at the same time and in the same approximate location as a Third Party Program. However, MiniMed may not pay or reimburse the expenses of the HCPs attending the Third-Party Program (such as flight to the location where the conference is being held) to attend the conference, workshop, Business Meetings, or product launch programs.

b. MiniMed HCP Consultant Meetings.

MiniMed may organize company events in and around the time and location of a Third-Party Program, for example advisory boards, clinical investigator meetings (Consultant Meeting) in order to take advantage of HCPs already attending that Third Party Program. In these situations, MiniMed may only pay for the expenses necessary for the provision of the services by the HCP at the MiniMed HCP Consultant Meeting, such as incremental accommodation or other expenses for the HCP to participate in the MiniMed HCP Consultant Meeting. All expenses must be limited to those specifically related to the MiniMed HCP Consultant Meeting, not the Third-Party Program.

c. HCP Faculty Costs for a Satellite Symposium.

In general, if an HCP is a faculty member at MiniMed 's Satellite Symposium MiniMed may pay the faculty member's associated costs including travel, lodging, and registration fees only if the HCP was not planning to otherwise attend the Third-Party Program. If the faculty has or is able to have their travel costs separately arranged by a third party, then MiniMed may not pay for those costs, and may only pay for any incremental amounts associated with the Satellite Symposium. If no other party (the Third-Party Program organizer, employer or other entity) has committed to pay for an HCP Consultant's travel to the Third Party Program, then MiniMed may pay the travel expenses and any accommodation and meal costs associated with the faculty's attendance at the Satellite Symposia, even if the faculty member attends the Third Party Program.

d. HCP Attendee Costs for Third Party Programs or Satellite Symposiums.

Except in accordance with regional policy, MiniMed must not pay for a registration fee, travel, accommodations, or any other costs associated with Third Party Programs or Satellite Symposia for an HCP Attendee.

B. Supporting Other Third-Party Activities through Educational Grants.

MiniMed may provide educational grants to HCOs, teaching institutions, and other third parties for the purpose of training and education. These donations include:

- Supporting an endowed chair at an academic institution;
- Educating fellows in recognized medical training programs;
- Educating the public on healthcare topics;
- Facilitating the travel of HCPs selected by the grant recipient to attend training and educational events; and

- Supporting educational and policy-making conferences and meetings.

C. Support for Third Party Research.

MiniMed provides monetary or in-kind support to third parties conducting research in three different ways.

1. *Support for General Research.*

General Research is research conducted by an independent third party aimed at increasing scientific knowledge and to improve scientific theory. Unlike other categories of research, General Research may not follow a structured scientific process and does not need to be related to a MiniMed Technology but should have defined goals and objectives. MiniMed may request study reports or other deliverables that are commiserate with the type of research support provided (e.g. heavily dependent on independent third-party discretion). Requests for support of General Research must follow MiniMed 's grants process.

2. *Support for External Research Programs.*

An External Research Program (ERP) is defined by MiniMed as an independent investigator-initiated study in which MiniMed is a potential supporter but is not the study sponsor. Therefore, MiniMed does not direct the design, conduct the study, or determine the outcomes of these studies. This means that the investigator is responsible for conducting the study and assuring the validity of the study data. The investigator, or investigator's institution, also assumes the roles and responsibilities of the study sponsor, including compliance with all regulatory requirements. ERPs involve research related to a MiniMed Technology or a new therapeutic use tied to MiniMed 's business strategy, and MiniMed often requests rights to use the data following the completion of the study. ERPs must not be confused with General Research and must follow MiniMed 's ERP Policy and approval process.

a. ERP Requests.

Requests must include documented goals, objectives, and milestones (e.g. clinical protocol, nature and scope of study, and budget), and, where applicable, the requirements for independent authorizations or approvals. ERP requests must also include documented deliverables to be verified before payment is made. Requests may include in-kind or monetary support for legitimate, study-related documented expenses, services, and/or reasonable quantities of no-charge product for the limited duration of the research.

b. ERP Agreement.

ERP agreements will define, at a minimum: deliverables associated payments tied to milestones; if product support will be provided; MiniMed 's right to review publications; and any rights that MiniMed has for use of the study data (consistent with local regulations.)

c. *Involvement by MiniMed.*

The investigator must retain independent control over the research. You must not take on activities that would fall within the responsibility for a clinical sponsor such as writing a protocol, developing a patient informed consent, medical writing or data management and analysis. You may provide limited technical support activities if MiniMed has unique capabilities and expertise required for the study conduct. Document any technical support in the ERP agreement.

3. *Support for Collaborative Research.*

Collaborative Research is research conducted jointly by MiniMed and an HCP where both parties contribute to the design, implementation and scope of the research. It is important to note that Collaborative Research is neither General Research nor an ERP. You must consult Legal & Compliance on the requirements for conducting Collaborative Research.

D. *Charitable Donations.*

MiniMed may make donations to Charitable Organizations or fundraising activities supporting Charitable Organizations in accordance with regional or local policies. Separate requirements may apply to requested product donations.

1. *Charitable Organizations.*

Donations must be made for genuine charitable purposes and only to organizations with bona fide charitable and/or philanthropic purposes ("Charitable Organizations"). Any donation must be used for the stated charitable or philanthropic purposes of the Charitable Organization.

2. *Fundraising Activities or Events.*

MiniMed may donate to support an HCP's fundraising event (such as a golf fundraising event or formal gala) if the recipient is a Charitable Organization and at least a portion of the donation qualifies for a charitable tax deduction.

3. *Indigent Care Donations.*

Donations of MiniMed Technologies for indigent patients must exclusively benefit patients and must be permitted under applicable local laws. Product donations for indigent cases should be contingent upon confirmation or agreement that no third parties or patients will be billed for the donated product. Product donations must be provided with an invoice or other notice which appropriately discloses that the product was provided without a charge to the HCP/HCO. If the product donation is for supporting patients in a different country, you must work with

Legal & Compliance to ensure that all anti-corruption, sanction, and trade compliance requirements are satisfied before approving the donation.

E. Commercial Sponsorships.

MiniMed may provide a payment or in-kind support to a third party in exchange for advertising or promotional opportunities ("Commercial Sponsorships"). MiniMed may provide Commercial Sponsorships if the level of Commercial Sponsorship reflects a commercially reasonable fee in exchange for the marketing and promotional benefits received by MiniMed. Examples of the marketing or promotional benefits may include advertising, signage, or display and exhibit space. Any Commercial Sponsorship must comply with applicable laws governing the marketing and promotion of MiniMed Technologies. Contact Legal & Compliance to understand the regional Commercial Sponsorships review and approval process.

F. Exhibits or Booths

MiniMed may purchase an exhibit or booth for a commercially reasonable fee at an appropriate Third-Party Program or event (e.g. conference, seminar, or convention) where MiniMed representative(s) are in attendance. These events can be held in-person or virtual, but the agenda for the event will have at least one topic related to a MiniMed product or have alignment to diabetes disease. The purpose of the Exhibit is to demonstrate MiniMed products, display product-related information, and engage in a mutually active dialogue with attendees. When virtual, the exhibit opportunity must include a real-time mutually active engagement (e.g. short product related presentation, FAQ presentation, or online chat feature) between MiniMed and conference attendees. In general, MiniMed should not be the "sole" exhibitor at the event. A MiniMed representative should be present and using the space during the event.

#### **Standard 4 - Joint Education and Marketing Programs**

You may partner with HCPs to conduct joint-education and marketing programs to educate patients and other HCPs on:

- medical conditions;
- the range of testing or treatment options available;
- the availability of MiniMed Technology; and
- the HCP's ability to diagnose or treat related medical conditions.

These programs include therapy awareness/education programs or patient awareness programs. To conduct these activities, you must ensure that:

- MiniMed and the HCP share contributions (in-kind and/or financial) and costs of the program;
- The event/activity must highlight both the MiniMed Technology and the HCP's role relating to diagnosis or treatment of related medical conditions;

- The arrangement is documented in a written agreement describing the purpose of the arrangement and the roles, responsibilities, and contributions of each party, including payment of costs;
- The HCP discusses only approved uses of MiniMed Technologies;
- MiniMed either controls or reviews and approves the agenda of any jointly conducted education and marketing programs; and
- Any invitations, promotional material, and/or presentations appropriately disclose MiniMed as a co-sponsor.

You must consult Legal & Compliance when conducting these activities to ensure compliance with applicable local laws.

### **Standard 5 - Travel, Lodging, Meals & Other Forms of Business Courtesies**

Additional requirements apply to these types of expenses.

In addition to the General Provisions requirements, MiniMed may pay modest and reasonable travel and lodging costs for HCPs when there is a Legitimate Need that supports the HCP's in-person participation and it is permitted by local law.

All reservations (air, hotel, and car) must be made through MiniMed's online booking tool or the designated travel agency for domestic and international trips. Approved and preferred MiniMed suppliers (e.g., airlines, hotels, and rental car firms) must be used whenever possible. Airlines, hotels, or rental car firms cannot be selected with regard for HCP's frequent traveler memberships.

- **Payment.** Unless permitted by regional policy, HCP travel expenses must be paid directly to a third-party supplier (airline, hotel, travel agent, etc.) or other third party (if the organization is not affiliated with the HCP).
- **Arrival and Departure Dates.** Depending on the agenda and flight availability, HCPs should arrive no earlier than the day beforehand and depart no later than the day after the activity or engagement.
- **Travel Extensions.** MiniMed must book travel for HCPs based on MiniMed's business needs. HCPs are responsible for any change requests to extend travel. This includes any costs for the requested extensions and for making any logistics changes directly with the travel and lodging suppliers.
- **Guests or Other Personal HCP Expenses.** MiniMed will not pay for or contribute to any expenses for an HCP's partner, spouse, or guest. Similarly, MiniMed will not pay for or contribute to an HCP's personal travel or lodging change requests or extensions.

**Part A. Travel by Air.** The following rules apply when arranging air travel for HCPs:

1. Booking Air Travel.
    - a. **Booked by MiniMed.** Air travel must be booked by MiniMed using MiniMed's online booking
- Global Business Conduct Policy

- tool or designated travel agency.
- b. **Booked by HCP (Business Travel).** In the rare instance that an HCP separately books his or her own air travel, MiniMed is not obligated to reimburse the HCP for that expense. If MiniMed does reimburse the HCP, MiniMed may only reimburse the HCP up to the amount MiniMed would have paid for the air travel. MiniMed will not provide HCPs cash in lieu of a ticket.
  - c. **Booked by HCP (Non-Business Travel).** Air travel changes for additional time beyond MiniMed's business needs must be booked by the HCP, are at the HCP's personal expense, and may not be reimbursed.
2. Class of Service.
- a. **Economy Class.** In general, MiniMed only allows economy class travel.
  - b. **Business Class or Equivalent.** For travel with flight segments equal to or greater than five hours, business class travel or its equivalent is permitted.
  - c. **Limited Circumstances.** In limited circumstances, business class travel or its equivalent may be provided for flights less than five hours, subject to applicable laws and industry codes if:
    - i. There is a genuine medical condition with medical certificate presented; or
    - ii. Other extenuating circumstances apply (such as market conditions or specific business needs) that require consideration for business class travel.These exceptions must be approved in accordance with the Global BCS exception process.

3. **Class of Service Upgrades.** In limited circumstances and associated with the use of low-cost carriers, MiniMed may pay for early boarding or seat assignment if this will reduce the risk of delay for an HCP. However, in all other circumstances, MiniMed will not pay for upgrades, fees for seat selection, or fees for early boarding based on a request from an HCP. HCPs choosing to incur these fees do so at their own expense, and the fees must not be paid for or reimbursed by MiniMed.
4. **Restrictions on Modes of Air Travel.** All air travel is limited to commercial airlines or MiniMed-approved commercially chartered aircraft. MiniMed will not pay any costs associated with a private plane. Helicopter travel is not permitted for point-to-point travel. Helicopter transfers between airports for domestic to international connections are permitted only if provided free of charge by the airline from which air transportation is purchased.
5. **Baggage Fees.** When permitted by regional policy, HCPs may be reimbursed for baggage fees if reasonable and in proportion to the duration/business reason for travel.
6. **Travel Insurance.** When permitted by regional policy and allowed by law, MiniMed may purchase travel insurance for HCP Consultants or HCP Attendees in conjunction with the air travel ticket. The following additional requirements apply:
  - a. **Legitimate Need.** Travel insurance may only be purchased when the HCP is traveling because of a Legitimate Need to provide services for MiniMed or to attend a MiniMed-conducted activity.
  - b. **Limited Circumstances.** MiniMed may purchase travel insurance for two limited circumstances:
    - i. Based on established local custom, MiniMed may purchase travel insurance for HCPs who reside, practice or work in the APAC region; or
    - ii. In all other regions, MiniMed may only purchase travel insurance as required for HCPs to gain entry into a country (e.g., when required by a government for travelers to cover medical costs, typically associated with epidemics such as COVID-19).
  - c. **Minimal Coverage.** Travel insurance must not exceed the minimal amount of coverage necessary.
  - d. **MiniMed Business Needs.** Travel insurance must be limited to MiniMed's business needs for the time period necessary for the provision of services or attendance at a MiniMed-conducted activity.

For all other circumstances, purchase of travel insurance for HCP Consultants or HCP Attendees is not permitted.

**Part B. Travel by Rail.** The following rules apply when arranging rail travel for HCPs:

1. **Booked by MiniMed.** In general, rail travel must be booked by MiniMed using MiniMed's online

booking tool or designated travel agency.

2. **Booked by HCP.** In the event that MiniMed is unable to book rail for the HCP, MiniMed may reimburse an HCP for the reasonable costs incurred by the HCP.
3. **Guidelines.** Rail travel should be booked consistent and aligned with regional and/or country guidelines.

**Part C. Lodging.** The following rules apply when arranging lodging for HCPs:

When MiniMed is responsible for selecting the location and lodging for an HCP interaction, Employees must select a location and lodging based on program requirements, convenience of HCP Attendees, and cost savings to MiniMed. Employees should not select a facility based on the amenities provided, but on the facility's capabilities to serve the needs of the program. Employees should consult regional procedures for specific guidance on appropriate lodging for events conducted in the region.

1. **Hotel Accommodations.** Employees should arrange HCP hotel accommodations at an intermediate, business-class hotel where MiniMed has negotiated special discount rates and/or at hotel properties where MiniMed's designated travel agency has negotiated discount rates. If the MiniMed activity is in a venue with sleeping rooms, Employees should reserve accommodations at that venue (if the venue is appropriate) or within a reasonably close proximity. When HCPs are from another country, it is important to check with the local Compliance partner from the HCP's country to determine which hotel accommodations are appropriate for the HCP.
2. **Alternate Lodging Requests.** In rare circumstances and if permitted by regional policy, HCPs may be reimbursed up to, but not to exceed, the amount MiniMed would have paid at the preferred hotel property if an HCP elects to stay at an alternate location. The HCP is responsible for arranging and paying for any alternative lodging.
3. **Room Types.** HCPs should stay in a standard room or a room of an equivalent level. Employees will not arrange for or reimburse HCPs for upgrades to lodging accommodations.
4. **Requested Additional Days.** In the event an HCP wants to alter the travel plans for travel outside of MiniMed's business needs, the HCP is responsible for arranging and paying any fees related to hotel or travel modifications (e.g., extending or changing the trip based on personal needs).
5. **Hotel Charges.** Incidental lodging expenses are not reimbursable (e.g., in-room movies, mini-bar, movies or pay TV, telephone, laundry, dry cleaning, spa services, etc.). However, MiniMed may pay for resort fees when the hotel requires payment of the fee from every person who stays at the facility.
6. **Damage.** HCPs are personally responsible for any damage to hotel property due to misconduct

or negligent behavior. This includes, but is not limited to, hotel fines, smoking in non-smoking room, pets, theft, etc.

**Part D. Other Travel.** The following rules apply when arranging or reimbursing other travel for HCPs:

1. **Ground Transportation.** MiniMed may provide ground transportation for HCPs attending MiniMed-conducted activities. Employees arranging for ground transportation should use the most cost-effective means of ground transportation regulated by local authorities. The use of limousines or forms of luxury ground transportation is strongly discouraged unless other safe forms of transportation are not available.
2. **Rental Cars.** In general, HCPs are not permitted to rent cars at MiniMed's expense. When permitted under regional policy, MiniMed may choose to reimburse an HCP for a mid-size rental car, including fuel charges, in situations where it is more convenient for an HCP to drive to the location of the MiniMed-conducted activity or engagement. MiniMed does not reimburse HCPs for car washes, parking tickets, fines for traffic violations, supplemental insurance, damages/repair costs, or towing charges incurred when using a rental car.
3. **Personal Cars.** HCPs may use their personal automobiles at their own risk and liability. With the submission of appropriate documentation:
  - a. HCP Consultants.
    - i. **Allowable Expenses.** For MiniMed-related business travel exceeding 30 miles / 48 kilometers per round trip, MiniMed will reimburse for mileage, tolls, and parking charges.
    - ii. **Prohibited Expenses.** MiniMed will not reimburse for fuel, car washes, parking tickets, fines for traffic violations, insurance premiums, damage/repair costs, or towing charges incurred when using a personal car.
  - b. HCP Attendees.
    - i. **Allowable Expenses.** When permitted by regional policy or allowed by law, same as above for HCP Consultants.
    - ii. **Prohibited Expenses.** Same as above for HCP Consultants.
  - c. **HCP Mileage Reimbursement.** When permitted, the mileage reimbursement rate is based upon the local MiniMed Employee mileage rate in effect and the distance traveled to and from the MiniMed-conducted activity, provided the round trip exceeds 30 miles / 48 kilometers. The mileage reimbursement is set to cover all expenses related to the operations of the personal car.

**Part E. Non-Reimbursable Travel and Lodging Expenses.** MiniMed may neither purchase on behalf of, nor reimburse an HCP for, the following items which are prohibited expenses:

1. Use of airline frequent flyer club facilities;

2. Lost baggage charges;
3. Wi-Fi on flights for HCP Attendees;
4. Travel and ground transportation upgrades;
5. Lodging upgrades or the additional cost of an alternate and more expensive hotel;
6. Lodging charges for additional hours beyond check-out time or additional nights;
7. Other travel and lodging change costs not related to a MiniMed schedule change or HCP personal or professional emergency; and
8. Travel and lodging costs related to a partner, spouse, or other guests.

### **Standard 6. Meals and Refreshments**

Employees are responsible for ensuring responsible business interactions, including how the provision of occasional, modest meals and refreshments may be perceived as part of a legitimate business interaction. The term "meal" as used throughout this policy collectively refers to both meals and/or refreshments.

Meal expenses must be modest and reasonable. Meals should be subordinate in time and in focus to the bona fide discussion and presentation of scientific, educational, or business information.

If a MiniMed-conducted activity or Business Meeting is being held adjacent to a Third-Party Program, additional restrictions apply (see Standard 3, Part A3).

Employees may provide modest meals to HCPs if:

- The HCP attends and has a Legitimate Need for attending the activity associated with the meal and it is permitted under local law;
- The occurrence is an occasional business courtesy (i.e., infrequent and not routine);
- The cost of the meal is modest by local standards (e.g., within MiniMed spending limits);and
- The meal is provided in a manner conducive to the discussion or presentation of scientific, educational, or business information.

A MiniMed Employee must attend throughout a MiniMed-provided meal with HCPs.

Employees must not pay for or contribute to:

- Excessive amount of or unreasonably expensive alcohol. Employees should consider both the cost of an individual drink and the amount consumed by individuals at the activity or meal when evaluating whether the alcohol consumption is modest;
- Meals for a partner, spouse, or other guest of an HCP, even if the partner, spouse, or guest is also an HCP (unless the partner, spouse, or guest has their own independent Legitimate Need for attending the activity);
- A casual get-together with an HCP for the development of general goodwill;
- A celebratory event with an HCP (e.g., holiday, retirement, birthday, promotion, or year-end department celebration); or
- Meals or events hosted by an HCO/HCP that do not qualify as a Jointly Conducted Education and Marketing Program under Standard 4.

**Part A. Spending Limits.** Employees should calculate spending limits as follows:

1. **MiniMed HCP Meal Limits.** To determine the appropriate spending limit for meals with HCPs, Employees must consult the MiniMed HCP Meal Limits (see [Global HCP Meal Limits](#)). Employees must consider any cumulative annual limits, if applicable in their country.
2. **Location.** In general, the per person spending limit is determined based on the location of the meal (country and/or city where the meal is taking place).
3. **Per Person Limit.** When determining whether a meal falls within the applicable spending limit, take the total cost of the meal divided by the number of attendees (e.g., average cost per meal per attendee) and compare to the applicable spending limit based on the location of the meal unless a country-specific spending limit applies (see exception below).
4. **Taxes, Tips and Service Charges.** Unless otherwise prohibited by law, the per person spending limit is calculated inclusive of taxes, tips, and service charges.
5. **Exception.** There are some countries that apply specific meal limits to HCPs from that country regardless of where in the world the meal occurs. Therefore, it is important to check in the [Global HCP Meal Limits](#) to see if any specific country requirements apply when an HCP attending the meal is from another country.

**Part B. Approvals.** To ensure an objective, one-over approval when one or more Employees are present at a meal, the most senior-level Employee from the function hosting must pay and

expense the itemized bill on their travel & expense card. Employees must not instruct nor allow suppliers to split a single expenditure into multiple transactions in order to avoid the meal limit. Employees also are not permitted to split checks with another Employee. The Employee who submits the expense is responsible for accurately and completely attributing the expense to all individual attendees. In the event a meeting planner is arranging the meal, the meeting planner may pay for the meal on their meeting card, even if a more senior-level Employee is present at the meal.

## **Standard 7 - Provision of Health Economics and Reimbursement Information**

MiniMed may support patient access to MiniMed Technologies by providing HCPs (and sometimes non-HCPs) with accurate and objective coverage, reimbursement, and health economic data related to MiniMed Technology (collectively "Reimbursement Activities.") Due to the unique nature of these activities, Reimbursement Activities may be conducted only by Employees designated by the business unit or geography who have appropriate knowledge and expertise. More specifically:

### **A. Information Support.**

MiniMed may provide HCPs with information related to Reimbursement Activities to enhance an HCP's understanding of:

- The clinical value of MiniMed Technologies and the services and procedures in which they are used;
- The most economically efficient use of MiniMed Technologies, including how the technology fits within the continuum of care, available coverage, reimbursement, and associated costs; and
- How to appropriately bill payors or government entities for services and procedures using MiniMed Technology and any proposed regulatory changes that might impact the HCP's decision of whether to buy or use MiniMed Technology.

### **B. Advocacy**

MiniMed may collaborate with HCPs, their professional organizations, and patient groups to conduct joint advocacy on Reimbursement Activities. This may include providing HCPs and their professional organizations with support in developing materials and otherwise providing direct or indirect input into payer coverage and reimbursement policies.

### **C. Coverage Support.**

MiniMed may assist HCPs to obtain patient coverage decisions from payers by providing:

- Information on payer policies;
- Training on procedures for obtaining prior authorizations; and
- Sample letters and information on medical necessity and appeals of denied claims.

#### D. Direct Patient Support Activities

At the request of an HCP or patient, MiniMed may implement programs to assist patients in obtaining coverage determinations, prior authorizations, pre-certifications, and appeals of denied claims relating to MiniMed Technology to facilitate patient access to MiniMed Technology. Such assistance is subject to appropriate privacy safeguards and local law and must not be provided as an inappropriate incentive to purchase or use MiniMed Technology.

You must consult Legal & Compliance when conducting these activities to ensure compliance with applicable local laws.

#### E. Prohibited Activities

You must not:

- Interfere with an HCP's independent clinical decision making or provide coverage, reimbursement, and health economics support as an unlawful inducement;
- Provide coverage, reimbursement, or health economics support to patients or HCPs that eliminates an overhead or other expense that the HCP would otherwise incur;
- Provide support services that have not been approved according to local requirements; or
- Suggest ways for an HCP to:
  - Bill for services that are not medically necessary;
  - Get inappropriate reimbursement or reimbursement not in accordance with payor or government rules; or
  - Engage in fraudulent practices to achieve inappropriate payment.

### **Standard 8 - Provision of Products or Equipment at Reduced Prices or No Charge**

MiniMed may provide HCPs with products or equipment at reduced prices or at no charge under certain circumstances.

#### A. Commercial Arrangements for Products or Equipment

MiniMed may offer products or equipment to HCPs/HCOs at a reduced price through a commercial arrangement (such as a rebate, discount, loan, or product bundle) that adheres to local pricing policies and procedures. You must give written notice to an appropriate HCP/HCO account representative when selling a MiniMed Technology at a reduced price or at no charge. You may fulfill the notice requirement by giving the HCP a purchase agreement, invoice, or other notice that reflects the actual or potential

discounted price, rebate amount, loan arrangement, or zero charge, or provides notice that the listed amount may be subject to an additional discount, credit, or other price reduction.

There are certain types of arrangements that may result in a prohibited inducement if done incorrectly. Consult Legal and Compliance before engaging in Consignment, Support Equipment or Capital Placement arrangements.

## B. Products or Equipment Provided for Evaluation

There are three ways that you may provide MiniMed Technologies to HCPs or patients for evaluation. If the MiniMed Technology is provided to the HCP at no charge it must be tracked for the purposes of reporting for transparency, where applicable.

### 1. *Demonstration Products or Equipment ("Demos")*

Demos are non-sterile products or equipment to demonstrate a product's capabilities and/or promote the sale of the product. Demos are not intended to be used in patient care and must be identified as not intended for patient use through designations like "Not for Human Use" on the product, the packaging, or documentation that accompanies the product. Demos are only intended for your use and generally should not be left with an HCP. In certain circumstances, you may provide Demos to HCPs for patient awareness or education.

### 2. *Samples*

Samples are generally products provided free of charge to an HCP or patient to clinically evaluate the MiniMed Technology. Samples are intended for use by patients and are typically provided as finished goods in sterile packaging. You may only provide a reasonable number of single-use or disposable products to an HCP or patient for the purpose of evaluation. If a patient has already purchased a product, you should not continue to provide samples of the previously purchased product without a legitimate clinical reason (e.g. the product has a new clinical indication, features or is being used in conjunction with a new product.)

### 3. *Equipment Loans for Evaluations*

Loans for evaluations are generally equipment provided at no charge to an HCP for the HCP to familiarize him or herself with the equipment in a clinical setting. In addition:

- During the evaluation, MiniMed retains title to the equipment;
- Equipment may be furnished only for a period that is (1) reasonable under the circumstances to allow an adequate evaluation as to whether the HCP wants to

buy or otherwise acquire the equipment; and (2) consistent with applicable transparency reporting requirements;

- Equipment must be promptly removed at the conclusion of the evaluation period unless the HCP enters into a commercial agreement for purchase of the equipment; and
- There must be a written agreement set in advance that addresses the term of use and return or purchase of the equipment at the end of the term.

C. Products or Equipment Provided for Grants, Research, or Donations.

To provide equipment or products through a grant, research or donation, you must follow the requirements outlined in the research, grants & donations sections above.

### **Standard 9 - Education and Technical Support in a Clinical Setting**

Employees who provide education or technical support directly to HCPs or patients ("Educators and Support Personnel") are trained on the operation and safe and effective use of MiniMed Technologies. Educators and Support Personnel play an important role by providing technical support to HCPs and patients on the safe and effective use of MiniMed Technologies.

Such activities may include but are not limited to:

- Providing support and education to HCPs and patients for the device (e.g., programming at the HCP's direction);
- Providing labeling information including product warnings, precautions, indications, and contraindications; and/or
- Sharing device performance specifications, physical attributes and parameters, operational details, and detailed instructions for use.
- 

Educators and Support Personnel must be trained on the specific MiniMed Technology for which they provide support and comply with applicable policies and requirements, including patient privacy and credentialing requirements. Educators and Support Personnel must comply with regional policies governing these activities. In addition, Educators and Support Personnel must comply with the following requirements:

- Practice of Medicine. In the course of providing technical support, Educators and Support Personnel must not engage in activities that might constitute the practice of medicine (e.g. diagnosing or treating illnesses or taking patient vitals or health histories, even if otherwise licensed to do so).
- Interaction with Patients. When interacting with patients and their families, Educators and Support Personnel must comply with MiniMed's Patient's Interactions Policy. Personnel must identify themselves as MiniMed Employees. The HCP/HCO must

complete any required consent forms prior to Educators and Support Personnel providing any technical support.

- Do Not Perform HCP Duties. In the course of providing technical support, Educators and Support Personnel must not perform duties typically expected to be performed by an HCP, such as scheduling patient appointments or accessing patient records. Similarly, Educators and Support Personnel must not fill out paperwork for HCPs that contains reimbursement, coding, or billing information.
- Clinical Decision-Making. Educators and Support Personnel may not interfere with an HCP's independent clinical decision-making. If an HCP plans to use MiniMed Technology in a manner that poses a risk to patient safety, Educators and Support Personnel should raise that concern to the HCP.
- Unapproved Uses of MiniMed Therapies. Educators and Support Personnel may provide technical support in situations involving a MiniMed Technology that an HCP has decided to use in a manner that is inconsistent with approved labelling if the support is limited to providing information consistent with the approved product labeling.

## Related Information

RELATED RESOURCES	RESOURCE PURPOSE	RESOURCE TYPE

## Policy Contacts

ROLE	TITLE
Policy Sponsor	Kim Tyrrell-Knott, Chief Ethics and Compliance Officer
Policy Owner	
Policy Contact	

## Abbreviations, Acronyms, and Definitions

TERM	DEFINITION
Anything of Value	<p>Cash or any item with real or perceived value, given directly or indirectly, to a Customer, Government Official or other Third-Party.</p> <p>“Anything of Value” includes, but is not limited to:</p> <ul style="list-style-type: none"> <li>• cash;</li> <li>• discounts;</li> <li>• rebates;</li> <li>• use of materials, equipment, software, or facilities;</li> <li>• benefits;</li> <li>• gifts;</li> <li>• travel and lodging;</li> <li>• grants, donations, support for research;</li> <li>• sponsorships;</li> <li>• contractual arrangements;</li> <li>• loans;</li> <li>• tickets, entertainment;</li> <li>• and promise of employment.</li> </ul>
Business Meetings	Meetings between a MiniMed Employee and an HCP to discuss product features, instructions for the use of MiniMed Technologies, sales terms, contracts, coding and reimbursement, patient access to therapies, and other scientific, educational, or business topics relevant to MiniMed
Charitable Organizations	Organizations with bona fide charitable and/or philanthropic purposes
Clinical Research	Research that involves human subjects
Clinical Research Agreement	A written agreement documenting payment to a Healthcare Organization where both parties contribute to the design, implementation and scope of the research.
Collaborative Research	Research conducted jointly by MiniMed and an HCP/HCO where both parties contribute to the design, implementation, and scope of the research.
Commercial Sponsorship	A payment or in-kind support provided to a third-party in exchange for advertising or promotional opportunities for MiniMed
Consulting Agreement	A written agreement documenting the consulting services provided by an HCP/HCO to MiniMed and the payment due to the HCP/HCO for

	rendering those services. Examples may include the provision of clinical, research, advisory, education, training, honoraria, or product development services.
Demonstration Products or Equipment ("Demos")	Non-sterile products or equipment you use to demonstrate a product's capabilities and/or promote the sale of the product.
MiniMed Technologies	MiniMed Technology(ies) means any MiniMed medical devices and products, technologies, digital and software platforms, related services, solutions, and therapies used to diagnose, treat, monitor, manage, and alleviate health conditions and disabilities.
Educators and Support Personnel	Employees who provide education or technical support directly to HCPs or patients.
Employees	A MiniMed employees regardless of citizenship, the country in which they work, or their level in the company, and, for purposes of this policy and without legal effect on the on the business relationship, contractors, board members and third parties
External Research Program (ERPs)	An independent investigator-initiated study in which MiniMed is a potential support but is not the study sponsor. External Research Programs (ERP)) are also referred to in the medical device industry as "Investigator Initiated Sponsored Research," "Investigator Initiated Studies," or "Physician Sponsored Studies."
Fair Market Value ("FMV")	The market or objective value of a good or service.
FMV Rates	An objective market rate for compensation based on the Fair Market value for the services sought under the Consulting Agreement in the country where the HCP resides or practices or where an HCO is located.
General Research	Research conducted by an independent third party aimed at increasing scientific knowledge and to improve scientific theory.
HCP Attendee	Healthcare Professionals who participate in MiniMed training and education activities, promotional activities (e.g., MiniMed site visits), and/or Business Meetings.
HCP Consultant	Healthcare Professionals who are delivering bona fide services to or on behalf of MiniMed under an HCP/HCO Services Arrangement.
Healthcare Organization ("HCO")	"Healthcare Organization" or "HCO" collectively includes: (1) entities engaged in the provision of healthcare, including but not limited to hospitals, universities, medical practices, home healthcare agencies, and government agencies; (2) companies formed or owned by Healthcare Professionals to perform personal consulting services (e.g.,

	<p>LLC); (3) organizations led or directed by Healthcare Professionals or in which Healthcare Professionals are members, including but not limited to patient advocacy groups, medical societies and professional organizations; (4) any Healthcare Organization or Healthcare Professional affiliated organization, if in a position to influence the decision to purchase or use MiniMed Technologies; (5) any other entities in a capacity to directly recommend or materially influence the decision to purchase or use of MiniMed Technologies; and (6) any other entities within scope of transparency reporting. These entities are typically in a position to prescribe, purchase, lease, recommend, use, arrange for the purchase or lease of, or have a material influence over purchasing decisions for, MiniMed Technologies.</p>
Healthcare Professional (HCP)	<p>"Healthcare Professional" or "HCP" collectively includes Healthcare Providers; any Healthcare Organization staff members or Healthcare Professional's Relatives, if in a position to influence the decision to purchase or use MiniMed Technologies; any other individuals in a capacity to directly recommend or materially influence the decision to purchase or use of MiniMed Technologies; and any other individuals within scope of transparency reporting. These individuals are typically in a position to prescribe, purchase, lease, recommend, use, arrange for the purchase or lease of, or have a material influence over purchasing decisions for, MiniMed Technologies.</p>
Healthcare Provider	<p>"Healthcare Provider" collectively includes but is not limited to physicians, nonphysician practitioners, medical fellows, medical students, or healthcare providers who are government officials, even when such individuals are interacting with MiniMed in their capacity as a government official.</p>
Legitimate Need	<p>Legitimate Need is a justifiable clinical, business, charitable, or educational reason for an interaction or activity.</p>
Medical Education	<p>MiniMed -organized instruction, education or training sessions regarding the safe and effective use of MiniMed Technologies</p>
Needs Assessment	<p>The process MiniMed uses to document in advance the Legitimate Need to engage HCPs/HCOs for Consulting Arrangements, including documenting an appropriate purpose for the type of Consulting Arrangement, the need for use of the HCPs/HCOs, and the scope of work to be conducted by the HCPs/HCOs.</p>

Pre-Clinical Research	Research involving animals, cadavers, or bench research
Proctorship	A training and education session in which an HCP Consultant observes, evaluates and verbally coaches and instructs an HCP trainee during a live surgery on medical procedures in support of one or more MiniMed Technologies. The HCP Consultant may provide guidelines for the use of the MiniMed Technologies and may objectively evaluate the HCP trainee on competence in surgical techniques. The HCP Consultant is not involved in any direct patient care, performing surgery or physically engaging with the patient. The HCP trainee has the relationship with the patient and the surgery is performed by the HCP trainee at the host medical institution. The HCP Consultant may conduct the proctoring in-person or virtually.
Product Development Arrangements	Consulting services provided by an HCP or group of HCPs to support the development of a new/enhanced MiniMed product or therapy where the HCP contributes intellectual property important to the design of MiniMed Technologies
Product Development Agreements	Written agreements with HCPs that document Product Development Agreements involving the payment of royalties or milestones
Reimbursement Activities	MiniMed -provided coverage, reimbursement, and health economic information support given to HCPs related to MiniMed Technology
Relative(s)	Immediate family members (spouse, domestic partner, child, parent, sister, or brother), and other family members (uncle, aunt, niece, nephew, first cousin, grandchild, grandparent, and parent-, brother, sister-, son-, or daughter-in-law). These definitions also include all "step" and "half" relations of the listed relatives (e.g., stepbrother, half-brother).
Satellite Symposium	A Third-Party Program for which MiniMed only controls the faculty and content of the event and does not control the selection of attendees.
Support Equipment (or aka accessory)	An instrument or equipment issued to HCPs that aids the use of a related MiniMed Technology.
Third-Party Program	A genuine independent healthcare-related educational, scientific, business, and/or policymaking conference, meeting or event put on by a third party other than MiniMed. This term includes accredited and non-accredited continuing education programs.

**Document History**

DATE	REVISION	REASON/DESCRIPTION