

Meals and Other Transfers of Value to Healthcare Professionals

1. Purpose

- 1.1. The purpose of this policy is to describe the responsibilities of Bioventus employees who provide meals or other transfers of value to Healthcare Professionals and to any entities or persons that can influence the prescribing or purchasing of Bioventus products.

2. Scope

- 2.1. This Policy applies to all Bioventus employees.

3. Definitions

- 3.1. **Healthcare Professional (“HCP”)**: an individual or entity that is in a position to purchase, recommend, use, arrange for the purchase of, or prescribe Bioventus products. Examples include physicians, physician assistants, nurses, pharmacists, medical directors, investigators, researchers, hospitals, group purchasing organizations, managed care organizations, insurers, wholesalers, and any of their employees who have the responsibility or authority to purchase, prescribe, recommend, influence, or arrange for the purchase or sale of a Bioventus product. This definition is not just limited to medically licensed professionals and also includes office staff.
- 3.2. **LMR**: Legal, Medical, and Regulatory Review, which refers to the Bioventus copy approval process.

4. Process Description

4.1. **Prohibition of Quid Pro Quo**

- 4.1.1. It is never appropriate or permissible to provide a *quid pro quo* (i.e., a favor or advantage granted or expected in return for something) to an HCP.

4.2. **Meals Provided to HCPs**

- 4.2.1. Modest meals may be provided occasionally to HCPs in conjunction with an educational or informational presentation or discussion.
 - 4.2.1.1. Meals must occur in connection with and subordinate to a legitimate exchange of information about Bioventus products.
 - 4.2.1.2. Meals may be provided to a specific HCP on an occasional basis, meaning not more than six times in a year.
 - 4.2.1.3. The cost for the meal must be “modest.” See the Bioventus Global Travel and Entertainment Policy for the meal limits in the U.S. and outside the U.S.
 - 4.2.1.4. Meals may only be provided to attendees who have a legitimate interest in Bioventus product(s), who are present for the discussion (no “dine and dash”). You cannot provide a meal to people in the HCP’s office who are not participating in the informational

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exchange. Guests and spouses are not permitted to participate unless they have a bona-fide professional interest in the information being presented.

- 4.2.1.5. The number of HCPs attending the meal must be conducive to a meaningful informational exchange.
- 4.2.1.6. Educational meals may be conducted virtually and are subject to all requirements within this Policy (*i.e.*, the meal is ancillary to the product discussion, HCP meal limits, attendance sheet requirement, etc.).
- 4.2.1.7. For educational meals over dinner ONLY, you may provide alcohol as long as it is reasonable and modest in quantity and accompanied by food. The cost of alcoholic beverages is included in the meal limits set forth in Bioventus' policy. Attendees may purchase their own drinks without restriction.
- 4.2.1.8. The location of the meal must be conducive to an educational discussion. It may not have a recreational value (e.g., sporting events, concerts, boat cruises, etc.) that are not conducive to informational exchange or the dissemination of medical and scientific information.
- 4.2.1.9. You may not provide cash or cash equivalents (*i.e.*, gift cards), or life event gifts such as for birthdays or weddings. There are no exceptions for holidays.
- 4.2.1.10. HCP meals must be documented on your expense report, and all attendees accounted for correctly in the expense reporting system. Furthermore, you must provide a completed attendance sheet and an itemized receipt.
- 4.2.1.11. If an HCP pays all his or her own meal costs, you may participate in the meal with the HCP even if there is not an informational exchange and regardless of where the meal takes place. This is referred to as a "Dutch meal."

4.3. Educational Items

- 4.3.1. Items that advance disease or treatment education and are intended solely for the HCP's professional use may be provided if all the following conditions are satisfied:
 - 4.3.1.1. The educational item is not provided as an inducement to purchase or prescribe Bioventus products or a reward for doing so;
 - 4.3.1.2. The educational item has been approved by the Compliance department and the appropriate LMR review;
 - 4.3.1.3. The educational item is designed primarily to educate patients or HCPs (*e.g.*, medical textbooks, anatomical models, informational sheets and brochures, patient self-assessment and tracking tools,

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- etc.);
- 4.3.1.4. The educational item is not of substantial value (*i.e.*, \$100 or less including tax and shipping);
- 4.3.1.5. The educational item does not have an independent value outside of the HCP’s professional medical practice; and
- 4.3.1.6. The educational item is offered to a given HCP on an occasional basis, and no more than once a year.
- 4.3.2. All educational items provided to HCPs are required to be tracked.
- 4.4. **Non-Educational and Practice-Related Items**
 - 4.4.1. It is never permissible or appropriate to provide gifts, in cash or in kind (including gift cards), to an HCP or their office.
 - 4.4.2. You may never provide any item or thing of value to an HCP or their office that is intended for their personal use (*e.g.*, flowers, calendars, etc.).
 - 4.4.3. Under no circumstances may any services be performed for HCPs or their office that they would customarily have to pay for themselves (*e.g.*, chart pulls, completing of prior authorization forms, mailing, copying material, etc.).

5. Revision History

Effective Date	Revision #	Description of Change
07/01/2023	1	New Policy