

Social Media Guidelines

UOC USA INC.

Purpose:

UOC USA INC. (“UOC”) is committed to ensuring that our products and services are marketed to and shared with the orthopedic community in a way that both accurately and in compliance with all applicable legal and regulatory guidelines describes and highlights them. Accordingly, UOC has compiled these Social Media Guidelines (the “Guidelines”), which Guidelines are intended to provide UOC personnel and the company’s collaborating health care professionals (“HCPs”) with straightforward and easy to understand rules for the posting of any information regarding our products and services on any social media platform including without limitation Facebook, Twitter, Instagram, and Tik-Tok. These Guidelines are essential for ensuring that public information regarding UOC and its products is both informative and compliant.

Pre-posting Review:

All proposed social media posts must be approved by corporate before being uploaded. This includes any posts proposed by UOC personnel ***and*** any posts by HCPs which include information about or reference to UOC and/or its products and services. Any requests for permission to post approved content on a personal or other corporate website must also be obtained in advance.

Social Media Post Requirements:

All posts must conform to the following requirements:

1. No identifiable patient information may be contained in any social media post; this includes photographs or x-rays which in any way identify a patient.
2. No discussions about or descriptions of any off-label applications of UOC products.
3. No discussion of or conclusions relating to anticipated clinical outcomes for a particular patient may be included in any post.
4. No posts relating to products or procedures which require FDA clearance or approval but have not yet been cleared or approved.
5. No content regarding products in the regulatory pipeline or under development.
6. No false or misleading statements or claims about the clinical attributes of a UOC product.
7. No references to HCPs without the HCP’s express written consent.

In the event that a patient gives consent for any of their identifiable information to be posted on social media, a written consent must be obtained and proof of such consent provided to UOC.

A failure to follow the foregoing guidelines in any particular will result in disciplinary action commensurate with both the infraction and the individual’s relationship to/affiliation with UOC.

Any questions regarding these Guidelines should be directed to UOC Compliance Liaison or Vice President of Marketing at US.compliance@unitedorthopedic.com