

Product In-Service Training for Health Care Professionals Policy

UOC USA INC.

1.0 Purpose

- 1.1 This policy sets out the process for UOC USA INC. (“UOC”) personnel the guidelines for providing in-service educational product training to Health Care Professional (each an “HCP” and collectively “HCPs”) customers of the company and their staffs. Oftentimes done at the lunch hour, these presentations may be accompanied by lunch or other light refreshments brought by UOC personnel. This policy details the guidelines for providing such meals, as well as other requirements for such presentations.

2.0 Scope

- 2.1 This policy applies to all UOC personnel, whether such individuals are interdependent contractors or direct employees of UOC (collective, “UOC Personnel”). It is incorporated into all independent sales agent and representative agreements by reference and is considered an integral part of UOC’s compliance program and is applicable to interactions with any HCP who is a past, present, or possible future user of UOC products.

3.0 Associated Materials

- 3.1 The following associated material is required for implementation of this policy:
- A. Product In-Service Training Sign-In Sheet FR05-003

4.0 Purpose of and Process for In-Service Training and Education

- 4.1 UOC has an obligation to assist its HCP customers and their staffs with respect to the proper and permitted uses of UOC products. In-service training and education is a common vehicle for providing such information. The purpose of such training is to allow HCPs and their staffs to become familiar with UOC products and to ask any questions that they may have about the use of such products. Such training and education is a significant component of UOC’s product support and customer service initiatives.
- 4.2 In-services should be conducted in the HCPs office or in a business setting that is conducive to a meaningful exchange of information, as well as a location that allows the UOC products and trays to be displayed such that their contents are easy to view and available to be handled.
- 4.3 UOC personnel should be present for the entire in-service and should be knowledgeable about the products such that they can answer all product related questions.
- 4.4 Only those HCPs and staff members with a need to have the information provided at the in-service may attend. Such individuals include but may not be limited to

the surgeon, his/her nurse, operating room personnel such as scrub techs and surgical nurses, and physician assistants. Staff members who may not be in attendance include receptionists, billing personnel, office managers, and any other non-medical staff person.

5.0 Guidelines for the Provision of Lunch or Refreshments

- 5.1 Meals or other refreshments may be provided in connection with an in-service but they must be modest in value and must be ancillary to the educational purpose of the in-service. "Take out" food such as pizza, sandwiches, or salads are considered appropriate refreshments for an in-service.
- 5.2 Only those individuals appropriately in attendance at the in-service may be provided lunch. The UOC personnel hosting the in-service should obtain a head count of attendees prior to the in-service and should not provide meals in excess of that number.

6.0 Documentation of Attendance

- 6.1 A Product In-Service Training Sign-In Sheet must be signed by each individual attending the in-service. It is the responsibility of the UOC personnel conducting the in-service to ensure that all attendees fill out the requested information and sign the sheet in the space provided. A failure to obtain this required documentation is a violation of this policy and may result in remedial action being taken against the UOC personnel who is responsible for such documentation.
- 6.2 Reimbursement for programs will be made to direct employees only (independent agents and representatives are not eligible for such reimbursement unless otherwise agreed in writing by UOC) and shall only be provided if the required Sign-In sheet has been satisfactorily compiled and turned in to the company with the expense reimbursement request.

7.0 Reporting Obligation

- 7.1 Pursuant to UOC's Physician Payment Sunshine Act Policy and Procedure spend for any HCP pertaining to a lunch and learn educational presentation or business discussion in which modest meals are provided are mandated reportable spend and must be reported to UOC for CMS reporting pursuant to UOC's policy. Any UOC Personnel who has a reporting requirement hereunder but fails to report in a timely fashion according to the policy will be subject to disciplinary action at UOC's discretion.