

GIFTS AND ENTERTAINMENT POLICY

Function

This policy provides procedures and guidelines for all employees that receive or provide Gifts and Entertainment within the Device Technologies Group of companies (DT).

The objectives of this policy are:

- to ensure all employees have a clear and consistent understanding of their responsibilities in relation to Gifts and Entertainment undertaken on behalf of DT.
- to ensure compliance with relevant Industry code of practice such as:
 - the Medical Technology Association of Australia (MTAA) Industry Code of Practice;
 - the Medical Technology Association of New Zealand (MTANZ) Code of Practice;
 - the Asia Pacific Medical Technology Association (APACMed) Code of Ethical Conduct;
 - or other country's equivalent codes.
- to reduce the risk for DT.

This policy may be varied or amended from time to time at the absolute discretion of DT. Failure to comply with any part of this policy may result in disciplinary action.

Scope

This policy applies to all members of the DT Group within Australia, New Zealand and Asia, its direct and indirect subsidiaries and joint ventures, collectively known as Device Technologies in this policy. This policy applies to all employees (including full time, part time, fixed term and casual employees), directors, officers and all persons who perform work for, or undertake work at premises owned by DT including contractors, consultants and volunteers (collectively referred to as “**employees**” in this policy).

References: Industry Codes of Practice

The MTAA Industry Code of Practice, the APACMed Code of Ethics (or equivalent other country's codes for medical technology companies) sets out an ethical framework which DT must comply with, in our relationships with Healthcare Professionals (HCP's) and also, where relevant, with Customers, Suppliers, Government Officials and Service Providers. This code is a guide to industry best practice, and all companies within this industry are encouraged to comply with its provisions. DT is an active member of industry associations and as leaders in the Medical Technology industries in Australia and New Zealand we will uphold our value of 'practicing good business' and act as leaders in our commitment to the MTAA, MTANZ and APACMed codes.

Definitions

APACMed: The Asia Pacific Medical Technology Association

Currency: All values referenced in the appendix to be recognised in local currency.

Customer: Individuals or businesses that DT provides products and services to excluding Healthcare Professionals (HCP).

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DT: The Device Technologies Group of companies.

ECC: Ethics and Compliance Committee.

Entertainment: Both entertaining and being entertained includes sporting events, musicals and any other activity not directly related to Training and Education and genuine business interactions.

Gift: Any item of value that is given to someone. In the context of this policy, it may be construed by an independent party that the provision of a Gift may involve an expectation of reciprocity.

Government Official means:

- Officers and employees of any national, regional, local or other government.
- Elected or appointed government officials.
- Officers and employees of companies in which a government owns an interest.
- Candidates for public office.
- Political parties and their officials.
- Officers, employees or official representatives of any public international organisation.

HCP's: Healthcare Professionals.

MTAA Code: MTAA Industry Code of Practice in Australia

MTANZ: Medical Technology Association of New Zealand

Supplier: Individuals or businesses that DT receives products and services from excluding Healthcare Professionals (HCP).

Service Provider: Individual or businesses that DT receives services from excluding Healthcare Professionals.

RESPONSIBILITY

1. All employees are required to read, understand and adhere to this policy. Additionally, the successful completion of the Marketing and Regulatory Accreditation Program is a mandatory requirement of this policy.
2. People leaders must lead by example and ensure all Gifts and Entertainment expenditure aligns with this policy and appropriate procedures.
3. All out of policy or non-compliant exceptions must be approved in advance by either the Ethics and Compliance Committee (ECC), Chief Executive Officer (CEO), Chief Financial Officer (CFO), Chief Operating Officer (COO), Chief People and Culture Officer (CPCO) or Director Sales and Marketing (DSM), in order to evaluate the risk and exposure associated with the occurrence.
4. Any out of policy or non-compliant occurrences that have not been approved in accordance with clause 3 above, will be reported to the Ethics and Compliance Committee.

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GIFTS AND ENTERTAINMENT WITH HEALTHCARE PROFESSIONALS

5. In all dealings with an HCP, employees must undertake ethical business practices and socially responsible industry conduct and must not use any inappropriate inducement or offer any personal benefit or advantage to promote or encourage the use of DT products.
6. The following 'Headliner Test' should be used by employees to determine if their interaction with an HCP is appropriate and compliant under the MTAA Code:
 - Would DT be proud if this story was front-page news?
 - Would it be seen as a good news story by the community?If the answer is no, the interaction is not appropriate.
7. DT employees cannot provide and cannot accept a Gift from an HCP. Occasionally DT may provide an item that benefits patients or serves as an educational function to an HCP providing the item has a fair market value of less than the *value expressed in the relevant Country Appendix* (except medical textbooks or anatomical models). Items with company and/or product branding must serve a genuine educational purpose. Samples may be provided to HCP's for genuine training and education, or medical technology evaluation purposes.
8. DT employees cannot provide and cannot accept Entertainment from an HCP.
9. If DT provides hospitality to an HCP as part of the presentation of scientific, educational or commercial information, the hospitality:
 - must be incidental to the bona fide presentation of scientific, educational, or commercial information and be provided in a manner that is conducive to the presentation of such information.
 - must not include Entertainment.
 - must take place in a setting that is conducive to bona fide scientific, educational, or business discussions and is not selected because of its leisure or recreational facilities.
 - must be modest in value (*value expressed in the relevant Country Appendix* per person for food and beverage).
 - must not involve DT paying for someone who did not actually participate in the meeting.
 - must not involve DT paying for any person who does not have a bona fide professional interest in the information shared in the meeting.
10. Note: simply taking an HCP to dinner is not considered appropriate, as this interaction does not have a genuine educational or scientific purpose.

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GIFTS AND ENTERTAINMENT WITH A CUSTOMER, SUPPLIER OR SERVICE PROVIDER

11. DT employees cannot provide and cannot accept a Gift from a Customer, Supplier or Service Provider except for the specific conditions detailed below.
12. Occasionally DT may provide an item that benefits patients or serves an educational function to a Customer, Supplier or Service Provider providing the item has a fair market value of less than the *value expressed in the relevant Country Appendix* (except medical textbooks or anatomical models). Items with company and/or product branding must serve a genuine educational purpose. Samples may be provided to Customer, Supplier or Service Provider for genuine training and education, or medical technology evaluation purposes.
13. Gifts from a Customer, Supplier or Service Provider that are considered modest and have a monetary value of less than the *value expressed in the relevant Country Appendix*, may be accepted so long as the Gift is not intended to improperly influence the business decision of the recipient. Gifts from a Customer, Supplier or Service Provider that are modest and associated with a significant life event (e.g. baby, wedding) may be accepted.
14. No Gifts can be received or made to the same Customer, Supplier or Service Provider more than twice per year.
15. DT employees may also attend work related educational courses provided by and paid for by a Customer, Supplier or Service Provider with appropriate approval from a business manager or more senior manager.
16. Allowable authorisation limits for Entertainment (i.e. entertaining or being entertained) by a Customer, Supplier or Service Provider such as meals are set at the *value expressed in the relevant Country Appendix* per person. Any Entertainment above, potentially above or unknown, this value requires prior approval by the CEO/CFO/COO/CPCO or DSM.
17. Any Customer, Supplier or Service Provider Entertainment that exceeds *value expressed in the relevant Country Appendix* per person requires reporting to the ECC.

GIFTS AND ENTERTAINMENT WITH GOVERNMENT OFFICIALS

18. DT employees cannot provide and cannot accept a Gift from Government Officials except for the specific conditions detailed below.

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19. Occasionally DT may provide an item that benefits patients or serves an educational function to a Government Official providing the item has a fair market value of less than *value expressed in relevant Country Appendix* (excluding medical textbooks or anatomical models). Items with company and/or product branding must serve a genuine educational purpose.
20. Gifts from Government Officials that are considered modest and have a monetary value of less than *value expressed in relevant Country Appendix* may be accepted so long as the Gift is not intended to improperly influence the business decision of the recipient. Gifts from Government Officials that are modest and associated with a significant life event (e.g. baby, wedding) may be accepted.
21. No Gifts can be received from or made to the same Government Official more than once per year.
22. Allowable authorisation limits for providing hospitality to Government Officials such as meals are set at *value expressed in relevant Country Appendix* per person. Any hospitality above this level requires prior approval by the CEO/CFO/COO/CPCO or DSM.
23. Only Executive Management have the approval to provide hospitality to Government Officials.
24. Any Government Official hospitality that exceeds *value expressed in relevant Country Appendix* per head requires reporting to the ECC.

GIFTS AND ENTERTAINMENT WITH DT EMPLOYEES

25. Allowable authorisation limits for Gifts to DT employees are set out in the table below. Any Gifts above the CEO's limit shall be reviewed by the ECC. Value limits are outlined in the relevant Country Appendix.
26. No employee can receive two or more Gifts from DT per financial year with an accumulative value of more than the *value expressed in relevant Country Appendix* without the prior approval of the CEO/COO/CFO/CPCO or DSM.
27. The agreed Gift value payable for recognition of long service is set out in the *value expressed in relevant Country Appendix*. Only, 10, 20 and 30 years of services are acknowledged by financial recognition.
28. Allowable authorisation limits for employee Entertainment such as meals and team activities are set out in the relevant Country Appendix. Any Entertainment above the CEO's limit shall be reviewed by the ECC.



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29. Proper record keeping must be kept for Entertainment of any kind as required to satisfy DT tax and governance obligations including MTAA annual reporting. These records include the invoice, attendees, venue details and purpose of Entertainment.

This policy may be varied or amended from time to time at the absolute discretion of DT. Failure to comply with any part of this policy may result in disciplinary action.

APPENDICES

- Appendix 1 - Australian and New Zealand Value limits in \$AUD;
- Appendix 2 - Singapore Value limits in \$SGD
- Appendix 3 - Malaysia Value limits in Malaysian Ringgit RM
- Appendix 4 - Thailand Value limits in Thai Bhat THB
- Appendix 5 - Vietnam Value limits in Vietnamese Dong đ

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Appendix 1 - Australian and New Zealand Value limits in \$AUD (excluding local government taxes)

Policy Reference	Specific Area of Expenditure – all are fair market value	Value Aust and NZ
Clause 7	Gift/Item that benefits patients or serves as an educational function to a Health Care Professional	<\$100
Clause 9	Hospitality to a HCP as part of the presentation of scientific, educational or commercial information, per person for food and beverage	<\$130
Clause 12	Gift/Item that benefits patients or serves an educational function to a Customer, Supplier or Service Provider	<\$100
Clause 13	Gifts/Items from Customer, Supplier or Service Provider	<\$100
Clause 16	Entertainment (entertaining or being entertained) limits with a Customer, Supplier or Service Provider unless prior approval granted by CEO/COO/CFO/CPCO/DSM	<\$125
Clause 17	Excessive Customer, Supplier or Service Provider Entertainment expense per person that requires reporting to the ECC	>\$200
Clause 19	Item that benefits patients or serves an educational function to a Government Official	<\$100
Clause 20	Gifts/Items received from a Government Official	<\$100
Clause 22	Hospitality expenditure limits for Government Officials such as meals per person	<\$125
Clause 24	Hospital expenditure limit for Government Official per head that requires reporting to the ECC.	>\$125
Clause 25	Employee authorising the Gift/item	Limit per employee
	CEO	\$3,000
	COO/CFO/CPCO/DSM	\$1,000
	Other Executive/General Manager	\$500
	Business Manager	\$300
	Sales Manager/Product Manager	\$200
	FITOPS Manager	\$200
	Other employees not in management	\$0
Clause 26	Value limit of Gifts/Items an employee can receive from DT per financial year	\$600
Clause 27	Long Service Recognition	
	10 Years	\$2000
	20 Years	\$3000
	30 Years	\$4000
Clause 28	Employee authorising the Entertainment	Limit per employee
	CEO/COO/CFO/CPCO/DSM	\$150
	All other managers	\$125



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Appendix 2 - Singapore Value limits in \$SGD (excluding local government taxes)

Policy Reference	Specific Area of Expenditure – all are fair market value	Value \$SGD
Clause 7	Gift/Item that benefits patients or serves as an educational function to a Health Care Professional	<\$100
Clause 9	Hospitality to a HCP as part of the presentation of scientific, educational or commercial information, per person for food and beverage	<\$130
Clause 12	Gift/Item that benefits patients or serves an educational function to a Customer, Supplier or Service Provider	<\$100
Clause 13	Gifts/Items from Customer, Supplier or Service Provider	<\$100
Clause 16	Entertainment (entertaining or being entertained) limits with a Customer, Supplier or Service Provider unless prior approval granted by CEO/COO/CFO/CPCO/DSM	<\$125
Clause 17	Excessive Customer, Supplier or Service Provider Entertainment expense per person that requires reporting to the ECC	>\$200
Clause 19	Item that benefits patients or serves an educational function to a Government Official	<\$100
Clause 20	Gifts/Items received from a Government Official	<\$100
Clause 22	Hospitality expenditure limits for Government Officials such as meals per person	<\$125
Clause 24	Hospital expenditure limit for Government Official per head that requires reporting to the ECC.	>\$125
Clause 25	Employee authorising the Gift/item	Limit per employee
	CEO	\$3,000
	COO/CFO/CPCO/DSM	\$1,000
	Other Executive/General Manager	\$500
	Business Manager	\$300
	Sales Manager/Product Manager	\$200
	FITOPS Manager	\$200
	Other employees not in management	\$0
Clause 26	Value limit of Gifts/Items an employee can receive from DT per financial year	\$600
Clause 27	Long Service Recognition	
	10 Years	\$2000
	20 Years	\$3000
	30 Years	\$4000
Clause 28	Employee authorising the Entertainment	Limit per employee
	CEO/COO/CFO/CPCO/DSM	\$150
	All other managers	\$125

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Appendix 3 - Malaysia Value limits in Malaysian Ringgit RM (excluding local government taxes)

Policy Reference	Specific Area of Expenditure – all are fair market value	Value RM
Clause 7	Gift/Item that benefits patients or serves as an educational function to a Health Care Professional	<RM280
Clause 9	Hospitality to a HCP as part of the presentation of scientific, educational or commercial information, per person for food and beverage	<RM360
Clause 12	Gift/Item that benefits patients or serves an educational function to a Customer, Supplier or Service Provider	<RM280
Clause 13	Gifts/Items from Customer, Supplier or Service Provider	<RM280
Clause 16	Entertainment (entertaining or being entertained) limits with a Customer, Supplier or Service Provider unless prior approval granted by CEO/COO/CFO/CPCO/DSM	<RM350
Clause 17	Excessive Customer, Supplier or Service Provider Entertainment expense per person that requires reporting to the ECC	>RM560
Clause 19	Item that benefits patients or serves an educational function to a Government Official	<RM280
Clause 20	Gifts/Items received from a Government Official	<RM280
Clause 22	Hospitality expenditure limits for Government Officials such as meals per person	<RM350
Clause 24	Hospital expenditure limit for Government Official per head that requires reporting to the ECC.	>RM350
Clause 25	Employee authorising the Gift/item	Limit per employee
	CEO	RM8000
	COO/CFO/CPCO/DSM	RM2800
	Other Executive/General Manager	RM1400
	Business Manager	RM840
	Sales Manager/Product Manager	RM550
	FITOPS Manager	RM550
	Other employees not in management	RM0
Clause 26	Value limit of Gifts/Items an employee can receive from DT per financial year	RM1500
Clause 27	Long Service Recognition	
	10 Years	RM5600
	20 Years	RM8400
	30 Years	RM11000
Clause 28	Employee authorising the Entertainment	Limit per employee
	CEO/COO/CFO/CPCO/DSM	RM400
	All other managers	RM350

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Appendix 4 - Thailand Value limits in Thai Bhat THB (excluding local government taxes)

Policy Reference	Specific Area of Expenditure – all are fair market value	Value THB
Clause 7	Gift/Item that benefits patients or serves as an educational function to a Health Care Professional	<THB 2,064
Clause 9	Hospitality to a HCP as part of the presentation of scientific, educational or commercial information, per person for food and beverage	<THB 2,683
Clause 12	Gift/Item that benefits patients or serves an educational function to a Customer, Supplier or Service Provider	<THB 2,064
Clause 13	Gifts/Items from Customer, Supplier or Service Provider	<THB 2,064
Clause 16	Entertainment (entertaining or being entertained) limits with a Customer, Supplier or Service Provider unless prior approval granted by CEO/COO/CFO/CPCO/DSM	<THB 2,580
Clause 17	Excessive Customer, Supplier or Service Provider Entertainment expense per person that requires reporting to the ECC	>THB 4,128
Clause 19	Item that benefits patients or serves an educational function to a Government Official	<THB 2,064
Clause 20	Gifts/Items received from a Government Official	<THB 2,064
Clause 22	Hospitality expenditure limits for Government Officials such as meals per person	<THB 2,580
Clause 24	Hospital expenditure limit for Government Official per head that requires reporting to the ECC.	>THB 2,580
Clause 25	Employee authorising the Gift/item	Limit per employee
	CEO	THB 61,920
	COO/CFO/CPCO/DSM	THB 20,640
	Other Executive/General Manager	THB 10,320
	Business Manager	THB 6,192
	Sales Manager/Product Manager	THB 4,128
	FITOPS Manager	THB 4,128
	Other employees not in management	THB 0
Clause 26	Value limit of Gifts/Items an employee can receive from DT per financial year	THB 12,384
Clause 27	Long Service Recognition	
	10 Years	THB 41,280
	20 Years	THB 61,920
	30 Years	THB 82,560
Clause 28	Employee authorising the Entertainment	Limit per employee
	CEO/COO/CFO/CPCO/DSM	THB 3,096
	All other managers	THB 2,580

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Appendix 5 - Vietnam Value limits in Vietnamese Dong đ (excluding local government taxes)

Policy Reference	Specific Area of Expenditure – all are fair market value	Value VD
Clause 7	Gift/Item that benefits patients or serves as an educational function to a Health Care Professional	<1,495,700 đ
Clause 9	Hospitality to a HCP as part of the presentation of scientific, educational or commercial information, per person for food and beverage	<1,944,410 đ
Clause 12	Gift/Item that benefits patients or serves an educational function to a Customer, Supplier or Service Provider	<1,495,700 đ
Clause 13	Gifts/Items from Customer, Supplier or Service Provider	<1,495,700 đ
Clause 16	Entertainment (entertaining or being entertained) limits with a Customer, Supplier or Service Provider unless prior approval granted by CEO/COO/CFO/CPCO/DSM	<1,869,625 đ
Clause 17	Excessive Customer, Supplier or Service Provider Entertainment expense per person that requires reporting to the ECC	>2,991,400 đ
Clause 19	Item that benefits patients or serves an educational function to a Government Official	<1,495,700 đ
Clause 20	Gifts/Items received from a Government Official	<1,495,700 đ
Clause 22	Hospitality expenditure limits for Government Officials such as meals per person	<1,869,625 đ
Clause 24	Hospital expenditure limit for Government Official per head that requires reporting to the ECC.	>1,869,625 đ
Clause 25	Employee authorising the Gift/item	Limit per employee
	CEO	44,871,000 đ
	COO/CFO/CPCO/DSM	14,957,000 đ
	Other Executive/General Manager	7,478,500 đ
	Business Manager	4,487,100 đ
	Sales Manager/Product Manager	2,991,400 đ
	FITOPS Manager	2,991,400 đ
	Other employees not in management	0 đ
Clause 26	Value limit of Gifts/Items an employee can receive from DT per financial year	8,974,200 đ
Clause 27	Long Service Recognition	
	10 Years	29,914,000 đ
	20 Years	44,871,000 đ
	30 Years	59,828,000 đ
Clause 28	Employee authorising the Entertainment	Limit per employee
	CEO/COO/CFO/CPCO/DSM	2,243,550 đ
	All other managers	1,869,625 đ