EXECUTIVE SUMMARY 2017 CODE OF CONDUCT

THE MEDTECH CANADA CODE OF CONDUCT ON INTERACTIONS WITH HEALTHCARE PROFESSIONALS

Why Medtech Canada has a Code of Conduct?

The Medical Technology Association of Canada (Medtech Canada) is dedicated to advancing healthcare through innovative technologies, devices and diagnostics ("technologies"). Because the relationships between Medtech Canada member companies ("Companies") and Healthcare Professionals[1] (HCPs) are so important, they must be guided by the highest ethical standards and comply with applicable laws.

For this reason, the Companies adhere to and promote a medical technology industry Code of Conduct. The Code sets out guiding principles that encourage ethical business practices and socially responsible industry conduct in collaboration and interactions with Healthcare Professionals. It is premised upon respecting the obligation of Healthcare Professionals to make independent product related decisions.

In 2005, the Medtech Canada member companies voluntarily adopted the Code of Conduct that was led and developed by the Association's members. Considered by all to be a "living document", its principles are regularly reviewed. Medtech Canada's Board of Directors unanimously approved a major update of the Medtech Canada Code of Conduct on Interactions with Healthcare Professionals in December 2009, September 2012, April 2015 and again in June 2017.

The Medtech Canada Code of Conduct is a "living document" and will be reviewed by the Medtech Canada Code of Conduct Committee annually to ensure the Code is aligned with the business and healthcare environments.

Why was the Code of Conduct restated?

The restated 2017 Code of Conduct, effective June 2017, recognizes the changing business and healthcare environments in the Canadian marketplace and different laws, policies and practices that govern healthcare regimes. It more fully clarifies principles that provide guidance on conduct between Healthcare Professionals and Companies. The 2017 Medtech Canada Code of Conduct supersedes and replaces all previous Medtech Canada Codes of Conduct.

The main differences in the 2017 Code

Medtech Canada's restated Code expands into important new areas, including:
- Companies may not provide direct financial support to Healthcare Professionals for professional development at third-party educational conferences.
- Addition of position papers as appendices to the Code: Value-Adds in Competitive Tendering; Guidance for Conducting an Effective On-Site Product Demonstration & Evaluation and Guidance for Staging an Effective Site Visit.

Interactions covered by the Code

Many interactions between Companies and Healthcare Professionals advance medical science and improve patient care. These include relationships to:
- Develop or improve medical technology.
- Promote and provide education on the safe and effective use of medical technology.
- Promote or support research and education.

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1 The term "Healthcare Professionals" includes "those individuals and entities that purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe Companies' medical technology products in Canada. This includes both clinical and non-clinical people who make product-related decisions of the sort listed. This is a broad definition, intended to encompass anyone with material influence over purchasing decisions. Note that there may be laws and other codes applicable to relationships with Healthcare Professionals, including relationships with government employees.

Principle areas covered by the Code

The Medtech Canada Code of Conduct, available in its full format at **www.medtechcanada.org/page/code,** clearly provides guiding principles and definitions within each of its following sections:

1. The Goal of the Medtech Canada Code
2. Scope of the Medtech Canada Code
3. Compliance with the Medtech Canada Code
4. Company-Sponsored Product Training and Education
5. Third-Party Educational Conferences
6. Sales, Promotional and Business Meetings
7. Arrangements with Consultants
8. Gifts
9. Grants and Charitable Donations
10. Request for Proposals (RFP) and Tenders
11. Entertainment and Recreation
12. Meals and Travel
13. Product Evaluations
14. On-Site Product Demonstrations
15. Site Visits
16. Third Party Intermediaries

Appendices
A. Value-Adds in Competitive Tendering
B. Guidance for Conducting Effective On-Site Product Demonstration & Evauation
C. Guidance for Staging an Effective Site Visit
D. Glossary

How is compliance to the Code of Conduct governed?

Medtech Canada promotes the need for all medical technology companies to provide for internal development and implementation of an effective compliance program grounded in policies and procedures, internal oversight, training and education, communication, monitoring, auditing, enforcement and proactive intervention and response. The Association encourages industry to ensure that all company representatives throughout Canada are diligently applying the principles encompassed in the Code of Conduct.

Medtech Canada does not actively govern adherence to the Code but will work with companies to build understanding around the need for compliance and policies and procedures that should be considered. Compliance with the Medtech Canada Code also includes a Review Committee for reporting potential Code issues and complaints. Complaints should be submitted to the Medtech Canada CEO & President, blewis@medec.org, for review by the committee on a quarterly basis.

All Companies have an independent obligation to ascertain that their interactions with HCPs comply with all applicable laws and regulations. This Code is intended to facilitate ethical behaviour, and is not intended to define or create legal rights, standards or obligations.

Understanding Value Added with respect to Request for Proposals (RFP) and tenders

At times, healthcare facilities request "value added" items, grants or donations from Companies in conjunction with an RFP or tender process. Provided that "value added" requests relate to the product and services requested in the RFP and are clearly defined (documented) within the RFP document, the procurement and response practices fall within the Code's guidelines.

What about relationships or interactions not addressed by the Code?

The Medtech Canada Code cannot possibly give specific directives for every conceivable professional relationship or interaction between Companies and Healthcare Professionals. When a situation is not specifically addressed, Companies agree to adhere to commonly accepted ethical business practices of the highest standard and practice socially responsible conduct.

The Code — Good for Patients, Healthcare Professionals and Companies

The Medtech Canada Code of Conduct is designed to ensure that all relationships between Companies and Healthcare Professionals are governed by the highest ethical standards. By adhering to these carefully developed guidelines, Companies create a win-win situation. Their vital relationships with Healthcare Professionals are safeguarded, legitimate business practices are affirmed and patients across Canada benefit from vital and innovative collaboration between Healthcare Professionals and the medical technology industry.

405 The West Mall, Suite 900 Toronto, Ontario M9C 5J1
t: 416.620.1915   toll free: 1-866-586-3332
www.medtechcanada.org