



Medtech Canada Guidance for Meals and Travel

This Guidance is intended to supplement, and be read in conjunction with, the MedTech Canada Code of Conduct for Interactions with Healthcare Professionals (HCP), Healthcare Institutions (HCI) and Government Officials (GO). Capitalized terms used herein are as defined in the MedTech Canada Code of Conduct.

Meals and Refreshments

- Meals and refreshments should only be provided in instances permitted by applicable laws, regulations, professional guidelines and codes of conduct. The MedTech Canada Code of Conduct provides that meals and refreshments may be provided in conjunction with Medical Technology Training and Education programs, Company sponsored educational, scientific or policymaking conferences, Site Visits, plant tours or demonstrations of non-portable Medical Technology, or as part of a bona fide sales, promotional or business meetings.
- Meals and refreshments must always be incidental and subordinate in time and focus to the exchange of business information. The primary purpose of the event must be the exchange of business information, not the meal or refreshments.
- Meals and refreshments should be provided in a setting and manner conducive to the exchange of business information (e.g., at HCP or Company offices, conference rooms, etc.). In some cases, for example in the case of smaller business meetings without the need for visual aids, a restaurant setting may be appropriate. As it is never appropriate for Companies to pay for Entertainment of HCPs, HCIs or GOs, it is inappropriate to business meetings or hospitality at a venue which could be characterized as Entertainment (e.g., golf club, sports arena, etc.).
- Meals and refreshments should be occasional in nature. Companies should keep records of all HCPs in attendance and avoid offering multiple meals and refreshments to the same HCP without legitimate business justification for doing so.
- Meals and refreshments must always be modest and Reasonable. High-end expensive meals are not appropriate.
- Companies should consider adopting controls around the provision of alcohol including, for example, adopting drink limits, drink spend limits or limiting the type of alcohol served, or disallowing alcohol all together.
- Companies may only provide meals and refreshments to HCPs who are legitimately present and interested in the *bona fide* exchange of business information. It is inappropriate for Companies to provide meals or refreshments to HCPs who were not present for the exchange of business

information, such as extending meal and refreshments to department members who were not part of the meeting, training or conference, or inviting non-attending HCPs to “dine and dash”.

- Companies may not pay for meals or refreshments for social guests of HCPs (including without limitation spouses or guests) or for any other person who does not have a professional interest in the business information being shared at the meeting or event.
- For meals and refreshments to be considered modest and Reasonable, MedTech Canada recommends a maximum spend per person of \$50 for breakfast; \$75 for lunch; and \$150 for dinner, where the meals and refreshments are provided in conjunction with a business meeting, Training and Education program or conferences. Where the meals and refreshments are provided as a stipend for an HCP who is travelling and eating on their own, MedTech Canada recommends a maximum stipend of \$25 for breakfast; \$50 for lunch; and \$75 for dinner. When in Canada these amounts are in Canadian dollars, and they are in US dollars when outside of Canada. Companies may consider exceptions to the above recommended limits, where local higher cost of meals and refreshments legitimately warrants it.
- Companies should keep records of meals and refreshments offered to HCPs including the purpose of the meeting, date, attendees, location, and itemized receipts.

Travel and Hospitality

- Companies may only pay for HCP travel and hospitality (e.g., hotels, lodging, etc.) in instances permitted by applicable laws, regulations, professional guidelines and codes of conduct. The MedTech Canada Code of Conduct provides that Companies may pay for HCP travel and hospitality in conjunction with Medical Technology Training and Education programs, where the HCP is a faculty member or presenter at a Company sponsored educational, scientific or policymaking conference, for HCPs attending Site Visits, plant tours or demonstrations of non-portable Medical Technology, or as part of other bona fide sales, promotional or business meetings.
- Travel and hospitality should only be provided where there are objective reasons to support the need for out-of-town travel to effectively deliver the exchange of business information. Companies should consider whether the meeting or event can be effectively held in a virtual matter or locally, rather than necessitating travel and hospitality. Overnight accommodations should only be offered where reasonably required due to time or distance constraints.
- Hospitality should be provided in a setting conducive to the exchange of business information (e.g., modest business hotel chains). As it is never appropriate for Companies to pay for Entertainment of HCPs, HClIs or GOs, it is inappropriate to host business meetings or hospitality at a venue which could be characterized as Entertainment (e.g., golf club, sports arena, etc.).
- Travel and hospitality should be occasional in nature. Companies should keep records of all HCPs being offered travel and hospitality and avoid paying for such matters for the same HCP on repeated or multiple occasions without legitimate business justification for doing so.

- Travel and hospitality must always be modest and Reasonable. High-end, expensive, luxury or exotic hotels are not appropriate. Modest travel is generally defined as “economy” class, with “business class” (not “first class”) exceptions permissible only for *bona fide* reasons, such as travel of more than five (5) hours or for other special or medical reasons.
- Companies may only pay for travel and hospitality for HCPs who are legitimately required to be present in person for the *bona fide* exchange of business information. It is inappropriate for Companies to pay for travel or hospitality for HCPs who are not required to be present for the exchange of business information.
- Companies may not pay for travel or hospitality for social guests of HCPs (including without limitation spouses or guests) or for any other person who does not have a professional interest in the business information being shared at the meeting or event.
- Companies should keep records of all travel and hospitality paid for HCPs including the purpose of the meeting, date, attendees, location, and itemized receipts.