



Coloplast Compliance Program for Sales & Marketing

References: AdvaMed Code of Ethics, September 2003

Office of Inspector General Compliance Program Guidance for Pharmaceutical Manufacturers, April 2003

Pharma Code on Interactions with Healthcare Professionals, July 1, 2002; Q and A Revised January 2004

Policy:

The Coloplast Mission statement reflects a corporate commitment to honest and responsible corporate conduct that should be incorporated into our interaction with health care professionals and government agencies. No unlawful or unethical inducement shall be used in order to sell, promote, recommend or arrange for sale, or prescription of our products. All interactions between Coloplast employees in their professional role with health care professionals shall have a professional purpose.

Any educational, marketing or promotional programs developed for health care professionals will clearly identify where scientific data is being used and disclose the source for the data. All promotional claims or statements will comply with current monographs, or guidelines consistent with responsible advertising standards.

We will always accurately represent the qualities of our firm, our products and our competitors' products. We demand truth in advertising from ourselves and our competitors.

Interactions with Health Care Professionals:

Customer Training and Education including In-service Events

Programs and events shall be held in facilities conducive to the effective transmission of knowledge with properly qualified training staff. Hospitality related to these events should be modest and subordinate to the training focus (less than 30% of planned time). Reasonable travel and lodging expenses may be paid for attendees with bona fide professional interest in the program.

Third Party Educational Conferences/Satellite Symposia

Conferences sponsored by national, regional or specialty medical associations or by accredited CME (continuing medical education) providers may be supported by grants for health professionals in training, faculty expenses, modest hospitality according to sponsor guidelines. Advertising and purchase of booth space is supported.



Sales and Promotional

Sales meetings are to discuss product features, contract negotiations and sales terms. Occasional modest hospitality including reasonable travel costs to a location that is conducive to information exchange is acceptable.

Consulting Arrangements

Consulting by health care professionals includes research, advisory boards or forums for product collaboration, presentations at training, and professional advice to customers. Formal Consulting Agreements or other documentation of the purpose or desired outcome of the arrangement is required.

Gifts

Modest, occasional gifts of nominal value (\$100 or less) may be provided to health care professionals, however never as a suggestion or inducement to provide Coloplast with an advantage or favor. Gifts should provide benefit to patients, serve an educational function or be branded promotional items of minimal value.

Grants and Other Charitable Donations or Unrestricted Educational Grants

Charitable donations are acceptable, but the charitable purpose for the donation needs to be clearly documented.

Product Samples

We will provide samples of products at no charge for evaluation by health care professionals and/or other potential customers.

Annual Limits

Total gifts, promotional materials, items or activities provided to any health care professional within a fiscal year should not exceed \$1,000 unless there is a formal consulting, training, or other professional arrangement documented. For California health care professionals there must be traceability of each of these maintained by the Coloplast employee involved in the interaction to allow auditing.

Interactions with Government Agencies or Health Care Professionals on Pricing and Reimbursement:

Coloplast is not a healthcare provider, nor a biller for medical products or services. However, Coloplast employees are often a source of information to support customers who are healthcare providers. All activities must



support accurate and responsible information related to provider billing for our products or procedures.

Procedure

A detailed instruction for activities and responsibilities related to the program is available for Coloplast employees.

Any perceived problems will be investigated and if unresolved, reported to management. Any disciplinary action needed will be done according to established Human Resource policies.

Documentation

The annual declaration of conformance and the compliance policy will be posted on the Coloplast webpage. The Coloplast 800 number will be provided as a contact for copies on these two documents as requested.