

# **OrthoPediatrics’ Policy and Procedures (“Policy”) for Adhering to Ethical Standards Concerning Interactions with Healthcare Professionals Outside of the United States**

## **Purpose & Scope:**

To establish a Policy to ensure OrthoPediatrics’ (“Company”) interactions with healthcare professionals are conducted with transparency and consistency.\* In countries outside of the United States, where the [Advanced Medical Tehcnology Association \(“AdvaMed”\) Code of Ethics on Interactions with Healthcare Professionals](#) is not applicable, we will comply with the local/national/regional equivalents thereof as solely determined by the Company, laws, regulations and best practices (“Local Regulations”). By maintaining adherence to the Local Regulations, including the AdvaMed equivalent(s), the Company is promoting consistent trust, integrity, and ethical business practices in every market we operate.

## **Training:**

The Company’s employees, distributors and agents (collectively, “Company Representatives”) thereof who conduct business on the Company’s behalf shall undergo annual training (either in person or via electronic communication & online training) to familiarize themselves with this Policy. Such training shall be conducted by the Company’s Healthcare Compliance Director and or General Counsel or by a designee of either officer.

## **Understanding Local Regulations and Codes of Conduct:**

It is the responsibility of all Company Representatives involved in interactions with healthcare professionals, government officials, and institutions to familiarize themselves with the Local Regulations. Examples of national/regional industry codes equivalent to AdvaMed include:

- [MedTech Canada](#)
- [MedTech Europe](#)
- [The Asia Pacifica Medical Technology Industry Association \(APACMed\)](#)
- [Medical Technology Industry Code of Practice \(Association of Australia “MTAA”\)](#)

## **Alignment with Global Compliance Standards:**

When no specific Local Regulations exist, or in cases of ambiguity, Company Representatives must follow the AdvaMed Code of Ethics. This approach ensures a consistent, ethical standard is applied globally.

## **Interactions with Healthcare Professionals:**

In all regions, Company Representatives must adhere to guidelines concerning gifts, meals, educational support, and consulting arrangements with healthcare professionals. All such interactions must be transparent, compliant with Local Regulations, and free of any intention to improperly influence medical decision-making.

## **Investigating Non-Compliance:**

A Company Representative who becomes aware of an alleged violation of Local Regulations shall promptly communicate the alleged violation to the Company’s Healthcare Compliance Director and or General Counsel.

Upon receiving notice of the alleged violation, the Company’s Healthcare Compliance Director or General Counsel or someone designated by either person shall determine if the facts and circumstances surrounding the alleged violation constitute a violation of local regulations.

**Corrective Action in Response to Employee Non-Compliance:**

If the Healthcare Compliance Director or General Counsel determines a violation has occurred by a Company employee, the Healthcare Compliance Officer or General Counsel shall report the findings to the Company's Human Resources Department.

Company employees who violate Local Regulations and this Policy will be subject to disciplinary action by the Human Resources Department, up to and including termination, pursuant to the Company's Employee Handbook. If the Company employee's violation is not sufficient to warrant termination, the subject employee, in addition to being subject to other disciplinary action, will be required to undergo additional training(s).

Failure to report a known violation of local regulations by a Company employee is a violation of this Policy and can result in disciplinary action by the Human Resources Department, up to and including termination of the subject employee, pursuant to the Company's Employee Handbook. Additionally, if the subject employee's manager(s) or supervisor(s) lack of diligence or lack of supervision contributes to a subordinate's violation of Local Regulations, it shall constitute a violation of this Policy and can result in disciplinary action, up to and including termination of the subject employee by the Human Resources Department, pursuant to the Company's Employee's Handbook.

**Corrective Action in Response to Distributor or Agent's Non-Compliance:**

If the Healthcare Compliance Director or General Counsel determines a violation has occurred by a distributor or agent thereof, the subject officer(s) shall weigh the severity of the violation to determine if it warrants termination of the distributor's Distribution Agreement or other contractual or business relationship with the Company, or if the subject distributor will be required to undergo additional training(s).

\*Reference to OrthoPediatrics or Company in this Policy refers to OrthoPediatrics Corp. and its wholly owned subsidiaries.