

## HCP Meals Policy

### Introduction

This policy provides guidance for meeting legal requirements and promoting highly ethical standards when interacting with HCPs and public officials.

Under the right circumstances, providing business courtesy to HCPs and public officials, such as meals, is an approved corporate practice. Any meal provided to an HCP or a public official must:

- Be related to a legitimate scientific, educational, or business presentation
- Have a reasonable outlook and a reasonable price
- A meal that is within Surgitech per-person meal restrictions and is considered modest and reasonable, as shown in Appendix 1
- Take place in a setting that is favorable to discussing Surgitech business
- Be limited to those who are directly involved in the business discussions, excluding family members and friends
- Be accompanied by a representative from the company who should be there the entire time
- Comply with applicable laws, regulations, and industry standards.

### Documentation

The above-mentioned points, as well as a comprehensive documentation for HCP meals including restaurant receipt, business justification and list of attendees should be recorded. Meals must not be offered to HCPs and public officials to obtain or maintain business or business advantages.

Country-specific limits for meals with HCPs and public officials are listed in Appendix 1. However, the limits for breakfast, lunch and dinner for Egypt are USD 35, 50, and 100 respectively.



**APPENDIX 1**

Region	Location of the Meal	Meal Limits (Per person, including tax and gratuity)			
		Currency	Breakfast	Lunch	Dinner
<b>Americas</b>	Brazil	BRL	65	210	300
	Canada	CAD	35	50	125
	Chile	CLP	18,000	36,000	90,000
	El Salvador	USD	35	50	85
	Mexico	MXN	475	1,200	1,450
	United States of America	USD	35	50	125
	<b>Other Americas Countries</b>	USD	35	50	100
<b>APAC</b>	Australia	AUD	45	75	150
	China (PR)	CNY	220	400	600
	Hong Kong (SAR)	HKD	270	500	1,000
	India	INR	2,000	2,500	5,300
	Indonesia	IDR	175,000	350,000	850,000
	Japan	JPY	4,200	5,000	10,800
	Korea	KRW	44,000	88,000	110,000
	Malaysia	MYR	120	140	270
	New Zealand	NZD	45	75	150
	Philippines	PHP	550	950	2,700
	Singapore	SGD	45	75	140
	Taiwan	TWD	1,100	2,000	3,500
	Thailand	THB	1,100	1,300	3,500
	Vietnam	VND	500,000	750,000	1,600,000
	<b>Other APAC Countries</b>	USD	35	50	100
<b>EMEA</b>	Belgium	EUR	25	40	80
	Czech Republic	CZK	800	1,350	2,150
	Denmark	DKK	230	400	800
	Eurozone	EUR	30	50	80
	Finland	EUR	30	50	110
	Greece	EUR	30	50	70
	Hungary	HUF	9,600	16,000	26,000
	Iceland	ISK	4,000	6,500	17,000
	Lebanon	LBP	55,000	90,000	150,000
	Norway	NOK	300	500	1,300
	Poland	PLN	130	225	355
	Romania	RON	140	240	380
	Saudi Arabia	SAR	135	230	370
	Sweden	SEK	300	500	1,100
	South Africa	ZAR	500	850	1,350
	Switzerland	CHF	36	60	125
	Turkey	TRY	135	225	360
	United Arab Emirates (UAE)	AED	135	225	430
	United Kingdom	GBP	28	47	75
	<b>Other EMEA Countries</b>	USD	35	50	100