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PURPOSE

This Policy is intended for our Company's Consultants, and it applies when they travel on their own while providing services on behalf of our Company.

DEFINITIONS

The Compliance Department maintains a comprehensive glossary of terms named [Definitions](#). These keywords and terms may change from time to time.

Americas Region

Anti-Gift Law in France

APAC – Asia Pacific Region

CNOM - Conseil National de l'Ordre des Medicines and IDHAE

Company

Company's personnel

Compliance Committee

Compliance Department

Consultant

EMEA – Europe Middle East and Africa Region

Guest(s)

HCP - Healthcare Professional(s)

LATAM – Latin America

PO - Public Official(s)

Policy(ies)

Procedure(s)

SharePoint

Transparency Laws and Regulations – Sunshine Acts

Work Report

POLICY

1 Consultant Travel

Where the Company's has organized lodging, air or rail travel, ground transportation, and meals should a Consultant choose to make their own arrangements, the Company will not reimburse expenses for arrangements made separate from what has been organized by the Company.

The Company will not reimburse: airport club fees or day passes, travel insurance for individual bookings (unless it is a country-specific need), travel expenses relating to personal vacations, side trips, unrelated trip extensions, weekends, Saturdays or unnecessary stopovers, any bookings that extend beyond the dates of which the Consultant services are requested on behalf of the Company, in-room charges at mini-bar, movies or games, personal items (e.g. toiletries, magazines, aspirin, etc.) and

health club or fitness center access fee charges. Room service is permitted if there is no meal provided by our Company.

All Consultant expenses must be reported to the Company on the Work Report form in SharePoint and must be accompanied by valid, itemized receipts for each expense incurred.

The Company will notify the superior of the EMEA HCPs and POs before signing a Consultant contract and the Company will publicly disclose all expenses in accordance with the Transparency Laws and Regulations in place worldwide.

1.1 French Consultant

Any financial support to French Healthcare Professionals and French Public Officials must be declared or authorized by the competent French authority (CNOM) based on the thresholds provided for by the Anti-Gift Law and at least 4 months in advance of the event's date. All expenses not disclosed or authorized in advance by CNOM will not be reimbursed and, where necessary, the Company may request the reimbursement from the Consultant for any overpayment outside of the Anti-Gift Law limits.

2 Ground Transportation

Individuals should use the most economical mode of transportation to and from airports, rail terminals, hotels, and business destinations where such transportation is not already organized by the Company.

2.1 Taxi, Uber, Others

Taxis and ride-share services such as Uber are the preferred form of ground transportation for the Company. Only economy ride-share options should be adopted. Luxury or oversized ride-share services will not be reimbursable by the Company. Car services with a professional driver should only be utilized when the cost is comparable to a taxi or economy ride-share transportation option.

2.2 Personal or Rental Car

If a Consultant chooses to drive their personal vehicle to the business destination, the Consultant will be reimbursed for actual business kilometers or miles driven according to the country specific allowable rate per kilometer or mile and only for the mileage spent (e.g. from the house to the airport or to the Company's event location) and parking, if needed. Fuel purchases and unrelated and unnecessary stopovers during the trip will not be reimbursed.

If applicable, the Company may reimburse up to a mid-size rental car when it is determined by the Company, **in advance**, that a rental car is necessary for business purposes. Any rental car class above mid-size is not permitted or reimbursable by the Company. Additional charges for insurance coverage or refuel charges from the rental car agency are not reimbursable by the Company and are deemed a personal expense if added to the rental car agreement. Prior to the return of the rental vehicle, the traveler is expected to refuel back to the level when the vehicle was initially picked up.

3 Meals

We will reimburse Consultants for their personal meals while travelling alone for our Company business, up to the meal limits defined below for the region. Meal reimbursement is permitted if there is no meal provided by our Company that day. All meal limits are inclusive of tax and gratuity or tip. The receipt should detail the number

of people served, date, itemized order detail (e.g. food and beverages), and the amount of the expense. Our Company will not reimburse for meals or drinks purchased for anyone other than the individual Consultant while traveling alone on our Company business. For example: you, our Consultant, decide to have dinner with another Consultant, we will only reimburse the amount of your dinner.

3.1 Americas

United States & Canada Consultants*	
Per Diem	\$100
*If in the event hosted by the Company, a meal is provided that day, the per diem will be reduced to \$50	
LATAM Consultants*	
Breakfast	\$25
Lunch	\$25
Dinner	\$50
* All rates in USD and are inclusive of applicable taxes and gratuity. Only actual expenses incurred shall be reimbursed.	

3.2 APAC

APAC Consultants*	
Breakfast	25
Lunch	25
Dinner	50
* All rates in the local currency (except Japan that is in USD) and only actual expenses incurred shall be reimbursed. APAC consultants include consultants based in Japan, Australia, and New Zealand, but not South Korea. Please note that due to the strict limits set by Korean law, our Company may only pay for travel for any Company event that takes place outside of Korea and features a product that is registered in Korea but is not yet on the market.	

3.3 EMEA

EMEA Consultants*	
Breakfast	25
Lunch	25
Dinner	50
* All rates in the currency of the country and only actual expenses incurred shall be reimbursed. Beverage, tax, and tips are included. For French Consultants breakfast is only 15 Euro and it should be included in the lodging.	

4 Guests

Guest includes the following people in relation to a Consultant: a spouse; the grandparents or the spouse's grandparents, parents, siblings, children, nieces, nephews, aunts, uncles and first cousins; the spouses of any of these people; and any other persons who share the same household with the Consultant, or any other person accompanying Consultants (e.g. administrative assistants, other family members). The Company does not reimburse or pay any expenses related to Guest of a Consultant. It is not appropriate for Guests to attend any Company events, even if expenses are paid by the Consultant. **Guests are never permitted.**

SCOPE

This Policy applies to all Healthcare Professionals and Public Officials providing services as Company’s Consultants globally.

RESPONSIBILITIES

The Compliance Department is responsible for implementing this Policy.

EFFECTIVE DATE

This Policy and revisions thereto shall be effective as of the date of approval by action of the Compliance Committee. This Policy remains in effect unless and until it is revoked, revised, or superseded by the action of the Compliance Committee or designee.

REFERENCES

REVISION HISTORY

Date of Board Approval	Effective Date	Revision	Purpose of Revision
1 Nov 2025	1 Nov 2025	-	Original Issue