

# Device Sales Team — Operating Procedures

Document ID: ACME-SALES-001 | Classification: Internal Use Only

## 1. Team Overview

The Device Sales Team is responsible for revenue generation through direct sales of ACME's FDA-cleared medical devices to hospitals, clinics, and healthcare systems across North America.

## 2. Team Leadership

| Role                     | Name           | Contact                      |
|--------------------------|----------------|------------------------------|
| VP of Sales              | Marcus Chen    | mchen@acmemeddevices.com     |
| Regional Director (East) | Sarah Williams | swilliams@acmemeddevices.com |
| Regional Director (West) | David Park     | dpark@acmemeddevices.com     |
| Sales Operations Manager | Jennifer Lopez | jlopez@acmemeddevices.com    |

## 3. Mandatory Rules

### 3.1 Pricing Authority

- Discounts up to 10%: Sales Rep approval only
- Discounts 11-20%: Regional Director written approval required
- Discounts 21-30%: VP of Sales approval required
- Discounts >30%: CEO and CFO joint approval required — NO EXCEPTIONS

### 3.2 FDA Compliance in Sales Materials

- ALL sales materials must be approved by Regulatory Affairs before use
- NEVER claim off-label uses or unapproved indications
- NEVER modify FDA-cleared marketing language without RA-2024 form approval
- Violation = immediate suspension pending investigation

### 3.3 Anti-Kickback Compliance

- Maximum gift value to HCPs: \$50 per interaction, \$150 annually
- ALL meals with HCPs must be logged in SalesForce within 24 hours
- NO cash equivalents (gift cards, vouchers) to healthcare providers — EVER

## 4. Required Approvals

| Action                       | Approver           | Form           |
|------------------------------|--------------------|----------------|
| Custom pricing agreement     | VP Sales + Legal   | ACME-PRICE-001 |
| Demo unit placement >30 days | Regional Director  | ACME-DEMO-003  |
| Government/VA contract       | Legal + Compliance | ACME-GOV-007   |
| International referral       | VP Sales           | ACME-INTL-002  |

## 5. Legal Gray Areas & Escalation

### 5.1 Consulting Arrangements with HCPs

If a physician requests a consulting or speaking arrangement, STOP. Do not negotiate terms. Escalate to: Legal Team (Angela Martinez, amartinez@acmemeddevices.com). Fair Market Value assessment required before any agreement.

### 5.2 Competitor Comparisons

Never make comparative claims unless pre-approved by Regulatory Affairs. Document ID: RA-COMP-2024 lists approved comparison statements only.

## 6. Key Contacts

| Department         | Contact         | When to Reach Out                 |
|--------------------|-----------------|-----------------------------------|
| Legal Team         | Angela Martinez | Contract review, HCP arrangements |
| Regulatory Affairs | Dr. Robert Kim  | Marketing claims, FDA questions   |
| Compliance         | Patricia Nguyen | Anti-kickback concerns            |
| Finance            | Thomas Wright   | Pricing exceptions                |