



Policy Title: **Financial Support to Professional and Patient Organizations, Medical Education Companies and Healthcare Institutions Policy: Grants, Sponsorships and Memberships**

Policy Number: **COM-POL-008.8**

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1. PURPOSE

The purpose of this Policy is to describe the principles and responsibilities of Daiichi Sankyo, Inc. ("DSI" or the "Company") Employees or Contingent Workers ("Employees") who (a) may interact with Professional and Patient Organizations, medical education companies or Healthcare Institutions ("HCIs") regarding Grants (collectively, "Requesting Organizations" or "Requestors"); and/or (b) are involved in the receipt, review, processing, approval or tracking of Grants DSI provides to those organizations.

2. SCOPE

This Policy applies to all Employees and Contingent Workers of DSI. This includes all DSI Employees and Contingent Workers within Daiichi Sankyo Pharma Development ("DSPD") Division, Daiichi Sankyo U.S. Business ("DSUSB") Division, and the U.S. Corporate Division ("USCD"), including, without limitation, global functions within those divisions. Employees or Contingent Workers outside the US who interact with US-based organizations are required to follow this Policy unless local rules are more restrictive, in which case, local rules must be followed.

- This Policy does not apply to: (1) charitable contributions (see the **Charitable Contributions and Product Donations** policy, COM-POL-009); (2) political contributions; expenditures intended for the purpose of influencing elections; or (3) lobbying expenditures made by the Company (both monetary and in-kind) to any 501(c)(3), (c)(4), or (c)(6) organizations.
- This Policy does not apply to Investigator Initiated Studies. See the **Investigator Initiated Studies** procedure (MDA-AOP-004).
- To the extent the Company engages a Requesting Organization to provide legitimate branded and un-branded Bona-Fide Services, Employees and Contingent Workers must follow the requirements in the **HCP Consultant Relationships and Service Agreements** policy (COM-POL-007).

Alliances (i.e., co-development/co-marketing) that the Company is engaged in are within scope of this Policy unless a separate process for the alliance is documented and approved by alliance representatives.

3. KEY POLICY STATEMENTS/PRINCIPLES

- The Company may provide Grants to Requesting Organizations that provide medical education programs or other medical or scientific initiatives that may be of interest to the Company.



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- All financial support to such organizations must abide by federal healthcare program and FDA regulations.
- All Grant and Sponsorship requests must be submitted electronically by the Requestor by completing request forms on DSI.com.
- Requests submitted by a Company Employee or Contingent Worker for Individual Memberships, Exhibit/Displays must follow the Programs and Grants Committee (PGC) policies and procedures (see the **Programs and Grants Committee Operational Policy** – LEG-POL-024 – and the **Programs and Grants Committee AOP** – LEG-AOP-010) and be approved by PGC.
- Sales and Marketing personnel may not be involved in, or have any influence over, the review or approval of Grants.
- Grants may never be provided to individual Healthcare Professionals (HCPs) or to any physician practice or group owned by HCPs.

4. REQUIREMENTS

The following sections outline the eligibility requirements and principles of engagement regarding the provision of funding for Grants, Sponsorships and Memberships.

4.1. Determination of Company Platform:

- The Company develops and maintains annual scientific and business platforms aligned by therapeutic area (or scientific area for DSPD) to identify the Company's medical, scientific, business and public policy objectives.
- The Company, at its discretion, may allocate budgets between functional groups to support appropriate medical scientific, business and public policy platforms.

4.2. Criteria:

- The Company engages with Requesting Organizations that have a stated mission to advocate for the improvement of patient care and the enhancement of the practice of medicine through scientific and educational endeavors.
- Professional and Patient Organization and HCI missions must be aligned with Company corporate values, medical and scientific platforms and business or public policy priorities.
- All requests for Grants and Sponsorships must be submitted by the Requesting Organization through DSI.com and processed through



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CyberGrants to ensure the Requesting Organization meets Company eligibility requirements to receive funding.

4.3. Independence:

- The Company does not engage in activities designed to influence the independent judgment of Requesting Organizations.
- The Company does not offer or provide any Grant, Sponsorship or Membership support with conditions or requirements that would interfere with the independence of the Requesting Organizations.
- The Company funding of Grant requests is focused on medical and scientific endeavors consistent with its scientific and therapeutic areas of interest and is not to be used as an opportunity to promote its products.
 - This is not intended to restrict the promotion of Company products by a Company Employee or Contingent Worker upon purchasing exhibit or display space at Fair Market Value ("FMV") at a hospital or a conference or event organized by a Professional or Patient Organization or HCI (see section 6 below).
- The Company does not engage in Grant-type arrangements with any Professional or Patient Organization or HCI within the same calendar year that the organization/institution is engaged in services to develop branded or promotional material for the Company.

4.4. Influence:

- The Company does not provide financial support as a means to:
 - Influence the registration, review or approval of our products in any country;
 - Create a favorable formulary or reimbursement decision;
 - Reward past, present or future prescriptions, referrals or recommendations of Company products; nor
 - Influence or directly support the development of clinical practice guidelines.
- Company Employees or Contingent Workers may not solicit, suggest, or recommend that any individual or entity seek funding or other forms of support from the Company.
- The Company discloses relationships with Requesting Organizations, as well as any faculty, speakers, or organizers of any programs funded by the



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Company, as required by law, regulation, and Company policy.

- The Company requires organizations, as well as any faculty, speakers, or organizers of any programs funded by the Company, to disclose any financial relationships with the Company as a condition of funding.
- Financial or in-kind support provided by the Company must always be clearly acknowledged and documented in a written agreement.
- The Company may provide Grant support for a program as multi-support or sole-support, but the Company must not require that it be the sole supporter of any proposed program.
- The objectives and scope of all interactions between the Company and the organization receiving Company funding are transparent.

4.5. Standards of Conduct:

- The Company follows its U.S. Standards of Business Conduct ("SOBC") and expects Requesting Organizations to have and adhere to their own standards of conduct or adhere to the basic principles in the SOBC.
- The Company does not provide support or pay a fee exceeding FMV (as applicable) for any activity, program or engagement.
- The Company only engages in business meals consistent with Company policy on business meals. Please see the **Gifts, Educational Items Value, Meals and Entertainment Involving HCPs and Customers** policy (COM-POL-003) for more information.
- Gifts, entertainment, or recreational activities may not be provided to or accepted from Professional and Patient Organizations or HCPs.

4.6. Infrastructure:

- The Company has determined that the purchase of equipment and funding for capital support projects for Requesting Organizations require strict scrutiny and evaluation. The Company does not directly fund capital support projects for these organizations. In all cases, the Company only considers requests for support of an independent 501(c) (3) foundation or other similar entity that are appropriately designed and operated to avoid the inducement or reward of prescriptions, referrals, formulary placement, favorable treatment in scientific guidelines, or other such impermissible benefit to the Company. General corporate recognition of the Company for such funding is appropriate and consistent with the other provisions of this Policy.
- To the extent that the Company has medical supplies or durable medical



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equipment that it wishes to donate and is in acceptable condition (i.e., not expired and in good working order), it may donate such items to a third-party organization with experience in securing recipients and properly handling such items. The Company will not make donations directly to Customers.

4.7. Submittal and Approval:

- All requests for Grants to support Requesting Organizations must be submitted to the grants portal on DSI.com and must be approved by the PGC for non-Continuing Medical Education (CME) activities or by the CME Committee (a sub-committee of the PGC) for CME activities. All requests for Grants Scholarships, Fellowships, academic research, and other grants as described herein, must be approved by the PGC.
- All requests for Sponsorships must be submitted by the Requesting Organization through the Grant Portal on DSI.com and must be approved by PGC.
- Internal requests for Corporate/Individual Memberships, Exhibit/Displays or any other financial relationships with Requesting Organizations must use the PGC Portal and be approved by the PGC.

4.8. Reporting and Monitoring:

- Compliance posts to the Company website, on at least an annual basis, information related to the financial support of Grants including 1) the recipient's name; 2) the program name and brief description of the program; and 3) the amount of the Grant.
- Compliance Monitoring monitors Grant activity – including request and approval documents, contracts or agreements, payments and materials related to the Grant – and any events or activities funded through the Grants in order to assess compliance with Company policies and procedures.
- Results from Grant Monitoring activities, including identification of potential violations, are reported to Compliance Investigations for follow-up and are summarized and included as part of the annual report to the OIG.

5. OVERVIEW OF INTERACTIONS AND FINANCIAL SUPPORT

The Company may provide financial support to Requesting Organizations in several ways:

- Grants provided to fund a specific educational or scientific objective without receiving any tangible corporate or commercial benefit in return. The Company includes the following types of support within its definition of a



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Grant:

- Certified Continuing Medical Education Grants
- Non-CME Educational Grants
- Fellowships, Scholarships and Similar Educational Opportunities
- Other grants for academic research, patient advocacy initiatives or public policy initiatives
- Educational Sponsorships to an organization for an event with a specific scientific or educational objective in which the Company receives some type of tangible corporate or commercial benefit from the organization.
- Corporate Sponsorships to an organization for an event without a specific scientific or medical educational objective in which the Company receives some type of a tangible corporate benefit from the organization.
- Memberships which may provide access to web sites, proprietary material, newsletters or the opportunity to provide input on industry, public policy, or health care panels or advisory councils.

While Requesting Organizations may use different terms to describe the type of financial support (e.g., sponsorships, charitable contributions, unrestricted Grants, medical Grants, etc.), the Company defines these requests as described in the sections below and summarized in Appendix A.

Financial support for Grants, Sponsorships, or Memberships may never be provided:

- To an individual;
- To any physician or physician practice or group owned by HCPs;
- On behalf of any Customer, patient, or other individual;
- To any Customer, Requesting Organization that has been debarred or otherwise excluded from any State or Federal health care program or employs the services of an individual that has been debarred or otherwise excluded from any State or Federal health care program;
- As a means to influence a Professional and Patient Organization or Healthcare Institution's mission or advocacy position; and
- To retroactively support a program or activity after it is completed.

All organizations requesting Grants are required to provide information (as applicable to the type of funding) including but not limited to: legal name, legal type of organization W-9 or FW8BENE Form, annual revenue, and accreditation certification.



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6. GRANTS

Under this Policy, Grants are unsolicited requests by a Requesting Organization seeking financial support of a specific bona fide medical, scientific, or educational objective. Solicited Grant requests may be accepted, only in response to a specific Call for Grants Application posted on dsi.com by the OGE.

The following principles apply to the evaluation and provision of Grants:

- The Grant must be described in a written agreement between the Company and the organization, which agreement describes the specific objectives and requirements. A key condition of any Grant is that the Company does not have control over content, presenter, attendees (in the case of a research Grant, any scientific protocol), and does not receive any tangible corporate or commercial benefit.
- The Company's decision to provide funding must be made based on the eligibility of the Grant Requestor and alignment between the Requesting Organization's and the Company's business and medical, scientific, or educational objectives.
- Grants are intended to provide financial support for the education and scientific objectives of these Requesting Organizations on a full range of treatment options. Grants may not be intended to promote a particular medicine or otherwise obtain a tangible benefit. Tickets or free attendance to a Grant-supported event for the sole purpose of OGE auditing are not considered tangible benefits.
 - Educational and Corporate Sponsorships that provide a tangible corporate or commercial benefit are excluded from the definition of a Grant, and may be funded by Company marketing or sales functions (see section 7 below for further discussion of Sponsorships).
- The Company employs objective criteria in its Grant decision making to help ensure all programs that are funded are bona fide educational or scientific programs or activities and the financial support provided is not an inducement to prescribe or recommend a particular medicine or course of treatment.
- To ensure independence of the Grant evaluation process, the Company has separated the function (and budget) responsible for approving and providing Grants from its Sales and Marketing functions. The Company established the Office of Grants and Education Review Committee ("OGE Review Committee"), within Medical Affairs, whose function is the review of external Grant requests and is authorized to review and submit funding requests to the PGC for final review.



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- The OGE Review Committee has sole discretion to support the funding of any individual request, subject to PGC approval, as well as the authority to develop its own forms, procedures and requirements for the intake, processing, review, etc., of funding requests consistent with this Policy. Refer to **Educational Grant Receipt, Review and Approval Procedure** – MDA-AOP-011.

6.1. Certified Continuing Medical Education (CME) Grants

Certified Continuing Medical Educational (CME) Grants are the provision of unrestricted funds to a CME accredited provider organization to develop educational activities that provide HCPs with continuing education credits. The following is a list of examples of accrediting bodies for various HCP types that require CME:

- For physicians – Accreditation Council for Continuing Medical Education (ACCME)-accredited, American Academy of Family Physicians (AAFP), American Osteopathic Association (AOA)
- For nurses – American Nurses Credentialing Center (ANCC), National League for Nursing (NLN)
- For pharmacists – Accreditation Council for Pharmacy Education (ACPE)
- For nurse practitioners – American Academy of Nurse Practitioners (AANP)
- For physician assistants – American Academy of Physician Assistants (AAPA).

The following principles apply to the Company's financial support of CME:

- The Company may provide funding for CME activities (including enduring materials and satellite programs) that support independent educational programs for HCPs, where the programs relate to pharmaceutical therapies, disease states, patient care, and/or other public health subjects in therapeutic categories relevant to the Company.
- The Company follows the standards for commercial support established by the Accreditation Council for Continuing Medical Education (ACCME) or other accredited entities. In addition to these standards:
 - The Company avoids support of CME activities where the central theme is based on a single product marketed by the Company, or a competing product, except where existing treatment options are so limited as to preclude any meaningful discussion of alternative therapies.
 - The Company does not provide any advice or guidance to the sponsor, even if asked by the sponsor, regarding the content, faculty, selection of region(s) and/or meeting location(s), or other logistics for a CME program



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supported by the Company.

- The Company may not financially support a CME program if the Requestor is advising or assisting the Company regarding the sales or marketing of any Company products. To be eligible, the Requestor may not have assisted or advised the Company regarding any sales or marketing activities for Company products in the twelve (12) months preceding the request.
 - Conversely, a Requestor that has received Company CME funding is prohibited from providing any advice or assistance to the Company regarding the sales or marketing of any Company product(s) for a minimum period of twelve (12) months after the latter of either: (a) Company's payment to the Requestor funding the CME activity or (b) the last presentation of the CME activity.
- Financial support is never offered for the costs of travel, lodging, or other personal expenses of non-faculty HCPs attending CME, either directly to the individuals participating in the event or indirectly to the event's sponsor. Similarly, funding is never offered to compensate for the time spent by non-faculty HCPs participating in the CME event.
- As a condition of funding, the Company requires the Requestor to submit final cost reconciliation for all CME activities funded by the Company.
 - Additionally, the Company may collect general information (for example, number of participants and their professional demographics, educational outcome measurements, or general feedback) regarding activities supported by Company funding.
- The Company may have exhibits or displays at CME activities only if permitted by the Requestor. However, payments and other arrangements for such exhibits or displays are considered Sponsorships and must be separate business transactions and not part of the CME Grant.
 - Exhibit or display requests may not be commingled with the CME funding request and such exhibit or display request(s) must be submitted to the PGC consistent with the **Program and Grants Committee AOP – LEG-POL-010**.
- The Company may not provide meals directly at CME activities, except that the Requesting Organization at its own discretion may apply the Company's unrestricted financial support, in whole or in part, for a CME activity to provide meals for all participants. Promotional activities may not be associated with the



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meal or reception.

- Company Employees or Contingent Workers may be present during the delivery of a CME activity, subject to the following restrictions:
 - The program is held at a venue or event generally open to attendance by other pharmaceutical companies and their employees (e.g., national or regional meetings, such as an American Heart Association meeting, or a state cardiology chapter meeting). Employees or Contingent Workers do not engage in any promotional activities immediately prior to, during, or immediately after the execution of the program.
 - Employees and Contingent Workers may not discuss CME activities with HCPs or Customers, whether before or after the activity.
 - Employees and Contingent Workers may not make a presentation at a CME activity, whether funded or not funded by the Company. This includes, but is not limited to, stand-alone programming and satellite symposia at national meetings.
- Employees and Contingent Workers may not be present for CME programs held exclusively in an HCP's office such as a webcast presentation or be present for CME programs for a small number of HCPs where no other pharmaceutical company employees are likely to be present (e.g., program held in a physician's office, or a program sponsored only by the Company, or a Company joint venture partner held at a restaurant). Employees and Contingent Workers may not direct others to attend CME programs that Employees and Contingent Workers may or may not be able to attend.
- The Company must comply with rules established by the accredited provider regarding the presentation or distribution of Company Product Materials or product advertisements, which must also be PMRT approved specifically for the CME event or activity). Employees and Contingent Workers may not engage in sales or promotional activities while in the same room as the CME activity.
- The Company may not offer, provide, or participate in any training of any kind intended to prepare any individual presenter(s) for any program or presentation supported in whole or in part by a CME Grant under this Policy.
- Company Employees and Contingent Workers may not distribute invitations, reminders, or enduring materials for CME events, even if in response to an unsolicited request from the Requestor.
- As may be required by law, for programs solely supported by the Company, the Company captures and reports payments or other transfers of value provided as compensation to physician faculty members for CME programs.
- Funds provided through a Grant must be used exclusively for the agreed-upon activities, and any unused funds at the completion of the activity are returned to



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the Company.

Departments that may fund CME Grants

All Company funds available to support CME programs taking place within the US, must be allocated to, held by, and dispersed by the OGE. The geographic location of a CME program, not the location of attendees, determines whether a program is occurring within the US.

All Company funds available to support global CME programs (those occurring outside of the US) must be allocated to, held by, and dispersed by OGE, Global Medical Affairs, or Clinical Development (DSPD).

Request / Approval Process

The OGE Review Committee within U.S. Medical Affairs conducts preliminary reviews of all Grant requests to ensure the proposal meets the Company's broad therapeutic or scientific funding objectives and all requirements of the relevant accrediting bodies. All CME grant requests must come directly from the Requesting Organization to the OGE Review Committee using the appropriate grant portal on dsi.com. Company Employees or Contingent Workers may not submit any CME requests on behalf of any organization. Only the OGE Review Committee may follow up in writing with any Requestor of funding to seek information on the status of the programs funded by the Company and to request the return of unused funds.

The OGE Review Committee is responsible for submitting all CME Grant Requests to the CME Committee, a sub-committee of PGC, whose function is to perform final review of all Grant requests.

If Global Medical Affairs based in the US or Clinical Development (DSPD) intends to fund a global (non-US) CME Grant request for a program (including any enduring material), the CME Grant request must be submitted for the review of the CME Committee, who will either approve or reject the CME Grant request.

6.2 Non-CME Educational Grants

Non-CME Grants are the provision of financial support to Requesting Organizations that support independent educational programs for HCPs or patients, where the programs relate to pharmaceutical therapies, disease states, patient care, and/or other public health subjects in therapeutic categories relevant to the Company but do not provide CME credits.

The same standards of independence, requirements for signed agreements, prohibited expenses, payment for participation, use as a promotional tool or reward for prescribing or referral, as described in the CME Grant section above, apply to non-CME Educational Grants.

Examples of non-CME educational programs the Company may consider for Grant



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support include:

- Lectures or other educational activities
- Managed care-sponsored educational activities
- Disease state and treatment education and awareness

For programs solely supported by the Company, the Company captures and reports, as required by law, payments or other transfers of value provided as compensation to physician faculty members for non-CME programs.

Non-CME Grants may be made to Requesting Organizations that provide educational activities relevant to Company's therapeutic areas of interest.

Funds provided through a non-CME Grant must be used exclusively for the agreed-upon activities. At the completion of the activity, all unused funds must be returned to the Company.

Departments that may fund Non-CME Educational Grants

Except for US patient advocacy-related non-CME grants, all Company funds available to support US non-CME educational grants taking place within the US must be allocated to, held by, and dispersed by OGE. Company funds available to support US patient advocacy-related non-CME grants may reside with OGE or Global Medical Affairs.

All Company funds available to support global (non-US) non-CME programs must be allocated to, held by, and dispersed by Global Medical Affairs or Clinical Development (DSPD).

Request / Approval Process

To ensure all requirements of independence are upheld, all non-CME Educational Program funding requests must come directly from the Requesting Organization to the OGE Review Committee using the appropriate grant portal on dsi.com. Company Employees or Contingent Workers may not submit any non-CME requests on behalf of any organization. The OGE Review Committee ensures the proposal meets the Company's broad, business, therapeutic, or scientific funding objectives. All requests meeting broad objectives must be reviewed and either approved or rejected by the PGC.

To the extent DSPD is funding a non-US, non-CME Grant request; it must be reviewed and either approved or rejected by the DSPD PGC.

To the extent that Global Medical Affairs intends to fund a non-US, non-CME Grant request for a program (including any enduring material), it must be reviewed and either approved or rejected by the PGC.



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6.3 Fellowships, Scholarships and Similar Educational Opportunities

Where not otherwise prohibited by state law, the Company may provide funding to Professional or Patient Organizations or HCIs to support the educational development of HCPs in training or who are medical students, residents, or fellows. Funds may not go to individuals; funds must go to organizations who determine how the funding is applied.

The Company also may provide financial support to permit medical students, residents, fellows and other HCPs in training to attend major, scientifically rigorous, educational conferences, so long as the training organization selects the individuals that will receive the funding.

From time to time, the Company may provide financial support to an ACPE accredited institution (or globally equivalent accreditation body for non-U.S. grants) and provide an educational opportunity for on-site training at a Company facility to one or more individuals selected by the institution. In such cases the Company retains the right to reject or terminate any individual selected by the institution.

The Company may also provide support for internal fellowship programs, in which the Company partners with pharmacy or medical schools, or other healthcare-related educational schools, to offer an on-site pharmaceutical industry training program in specific departments. In these instances, the Company may be involved in the selection process for determining the fellow.

The Company may support funding for the following types of educational pursuits:

- **External Fellowships** - Funds paid to medical schools, academic medical centers, teaching hospitals, schools of nursing, pharmacy or public health and other healthcare-related organizations to support educational opportunities in medical science for one or more years of study.
- **Internal Fellowships** – Funds paid to pharmacy or medical school(s) to support a 1- or 2-year on-site training opportunity in a pharmaceutical industry fellowship program, in partnership with the school(s).
- **Scholarships** - Funds awarded to students engaged in full-time academic activity (normally a medical degree) to aid with educational costs.

The following criteria must be in place in order for the Company to support Scholarships, external Fellowships, or similar educational opportunities:

- The Company's support must be used for the direct expenses relating to the program and not to subsidize the recipient's normal business expenses.
- The total funding received by the recipient from all sources may not exceed the actual amount required to complete the fellowship.



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- The application process must be controlled by the organization or HCI and must be based on objective scientifically meaningful criteria and open to all relevant institutions and candidates.

Departments that may fund fellowships, scholarships, or similar educational opportunities:

Funds to support Fellowships, Scholarships, or similar educational opportunities may only come from Medical Affairs (OGE or Global Medical Affairs) or the relevant functional areas of DSPD and US/Global Research & Development.

Funds to support internal fellowships may come from any relevant department within the Company that has partnered with a medical/pharmacy school for a pharmaceutical industry fellowship program.

Request / Approval Process:

All requests for Scholarships, external Fellowships, or similar educational opportunities support must come directly from the requesting organization using the grant portal on dsi.com and be submitted directly to the OGE Review Committee using the appropriate form to request support. The OGE Review Committee ensures the proposal meets the Company's broad therapeutic or scientific funding objectives. All requests meeting the Company's broad objectives must be reviewed and either approved or rejected by the PGC.

All requests for internal Fellowships must be submitted to the PGC for review.

6.4 Other Grants

The Company may decide to fund certain research related, patient advocacy related, or public healthcare policy initiatives or disease state and treatment awareness. Other types of grants may include:

- **Academic Research Grants** - Academic Research grants are funds provided to HCIs to support research activities that are not related to a development compound or a product approved for sale in the U.S. Research on compounds in development or products approved for sale in the U.S is considered clinical research (or in some cases, investigator initiated research) and is not covered by this Policy.
- **Patient Advocacy Grants** - Patient Advocacy grants are funds provided to Patient Advocacy Groups or Professional Societies to support healthcare related education and initiatives.
- **Public Policy Grants** - Public policy grants are funds provided to organizations or institutions to support healthcare related public policy initiatives

Departments that may fund Other Grants:



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Funding for other Grants must reside with Medical Affairs (OGE or Global Medical Affairs), or relevant functional areas within DSPD and US/Global Research & Development.

Request / Approval Process:

The requesting organization or institution must submit all requests for funding using the grant portal on dsi.com directly to the OGE Review Committee to ensure the proposal meets DSI's broad therapeutic or scientific funding objectives. All requests meeting DSI's broad objectives must be reviewed and approved by the PGC prior to support being provided.

7. SPONSORSHIPS

Sponsorships are defined as any financial support to a Professional or Patient Organization, HCI, or medical agency to conduct an event in which the Company receives tangible corporate or commercial benefits in return for its support. Sponsorships may be either Educational Sponsorships or Corporate Sponsorships, as further described in this section.

The following principles apply to both Educational and Corporate Sponsorships:

- The event must not be designed or targeted towards a disease, topic, or treatment that is inconsistent with the FDA approved labeling of a Company product to be displayed or exhibited.
- Funding may not be provided to physician-owned organizations, events that are organized and owned by a vendor, or for any event that is organized or conducted solely on behalf of the Company.
- The Sponsorship request from the from the requesting organization must include a tangible corporate or commercial benefit to the Company.
- Tangible corporate or commercial benefits do not include general recognition as a sponsor or other services that fail to promote DSI's business interests.
- The Company must make every effort to take advantage of tangible corporate or commercial benefits provided as part of sponsoring an activity.
- To the extent the Company receives Exhibit Space as part of its Sponsorship, the Company maintains control and approval of all materials presented within its booth.
- The event must be attended by one or more Company Employees or Contingent Workers who have completed appropriate training to promote the product, provide disease state presentations, or conduct corporate awareness activities.
- In the event that a tangible corporate or commercial benefit includes participation in an industry roundtable or advisory board, the PGC must approve the



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department(s) that may participate in the program based on the content of the event and the expertise required to represent the Company. The PGC will provide specific contingencies to the Company attendees by the PGC on acceptable interactions at the program.

- If the tangible benefit includes tickets or free admission to an event, PGC must also approve the department(s) that may attend the event. If the Company cannot take advantage of the tangible benefit or not use all of the tickets or free admissions to the event, the Company may return them to the organization or HCI. The Company may never give the tickets or free admissions to an HCP.
- DSI funding may not be used to pay for meals or entertainment. The Venue or any recreation/entertainment cannot be positioned as a significant reason to attend the event.
-

The following additional principles apply to Educational Sponsorships:

- Educational Sponsorships are events where the Company provides financial support to a Professional or Patient Organization, HCI, or medical agency to conduct a medical or scientific educational meeting, congress, or other program in which the Company receives tangible corporate or commercial benefits in return for its support.
- The event is organized and controlled by a Patient or Professional Organization or HCI that qualifies as a for-profit or a non-profit (501(c)(3)(4)(6)) healthcare or non-healthcare related entity.
- A commercial tangible benefit is generally defined as an opportunity to promote the Company, its products, or its pipeline compounds and may include exhibit space at the program/event, or an opportunity to display branded logos or product names outside the educational area.
- The Company may support Educational Sponsorship requests aligned with internal corporate values, medical and scientific platforms, business or public policy priorities. The Company only displays or exhibits promotional materials if the following criteria are met:
 - An event that is organized and controlled by a Patient or Professional Organization, HCI, or medical education company sponsor whose stated mission is to provide scientific or medical education to HCPs to enhance the practice of medicine and/or improve patient care.
 - There is a reasonable likelihood that the event will be attended by HCPs or Customers who treat patients who are reasonably expected to use the Company Products for an FDA-approved use. Promotional materials/activities are not permitted if there is a reasonable likelihood if



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there is a reasonable likelihood that the event will be attended by patients. In these situations, only corporate awareness materials/communications/discussions are permitted.

- Only PMRT (or co-promote/alliance process accepted by the Company) approved materials may be used at an exhibit or display.
- The Company only permits the use of the Company's name or logo as approved by PMRT in the exhibit area.
- Display/Exhibit is in an area separate and distinct from any educational activity at the event.
- Education must be the primary focus of the meeting event, and funds are for the support of the educational program. DSI does not pay for meals or entertainment.
- Venue or any recreation/entertainment cannot be positioned as a significant reason to attend the event.

Requests for Sponsorships in which the sponsored party conducts a relevant medical or scientific educational meeting, congress or other program for medical education purposes that do not, or cannot, include a tangible corporate or brand benefit are considered Grants for the purpose of this Policy.

Review and Approval of Educational Sponsorship Tangible Benefit Material:

- All promotional materials created, including, but not limited to, exhibits, advertising, promotional materials, messaging, etc. must be approved by PMRT. All materials and messaging must be on-label, fair balanced between benefits and side effects and supported by substantial clinical evidence.
- Speaking, symposia attendance, and other similar tangible corporate or commercial benefits from an Educational Sponsorship opportunity are also considered promotional opportunities and must be approved by the PGC. Their content must be approved by the PMRT. For situations where a medical expert is retained as a speaker for a satellite program or product theater, the **Speaker Selection and Contracting Procedure** (FIN-CIA-AOP-026) must be followed and all material created by the medical expert must be approved for use by the PMRT.
- In addition to promotional opportunities, Medical Affairs or Development Affairs may also staff a Medical Information, Disease State or Clinical Information booth. All materials utilized at these non-promotional booths must be consistent with DSI's policies regarding product messaging, PMRT-approved materials, responding to unsolicited requests for information and adverse events (see the **Medical Customer Interactions** policy, MDA-POL-001).

Requests for Educational Sponsorships may contain educational elements that meet the definition of a Grant. In such cases, the request must be treated as two separate



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parts:

- Grant request to support the independent educational component
- Educational Sponsorship request to support the tangible corporate or commercial benefit component

Grant Requestors are asked to separate the request for Educational Sponsorship support from the educational component (which is to be processed as a Grant) and submit the Grant as a separate request through DSI.com. The Grant portion of any Educational Sponsorship request must comply with all requirements of section 6 above.

The following additional principles apply to Corporate Sponsorships:

- Corporate Sponsorships are defined as any financial support to a for-profit or non-profit (501(c) (3), (c) (4), and (c) (6)) healthcare and non-healthcare related Organization, or HCI to conduct a non-educational event without a specific scientific or medical objective in which the Company receives some type of tangible corporate awareness benefit in return for its support.
- The event is organized and controlled by an organization that qualifies as a for-profit or a non-profit (501(c) (3), (c) (4), or (c) (6)) healthcare or non-healthcare related entity.
- A corporate awareness benefit is generally defined as an opportunity to promote the Company's mission and primary areas of focus and may include tickets for DSI Employees and Contingent Workers to attend, conduct a presentation, and/or staff an exhibit space at the program/event.
 - Corporate awareness benefits do not include general recognition as a sponsor or other services that fail to promote DSI's corporate awareness.
 - No product, disease-state or pipeline information material may be utilized, presented, shared or discussed at Corporate Sponsorship events/activities.
- Only Public Affairs and/or Legal-only approved materials may be used for presentations or at an exhibit or display at a Corporate Sponsorship.

Departments that may fund Sponsorships:

Because Sponsorships support corporate or commercial efforts, funds may be provided by a variety of functions across the business from global or US sources. Requests must follow the required PGC request/approval process as described below.

Request / Approval Process:

All Sponsorship requests must come directly from the Requesting Organization to the assigned representative within US Medical Affairs using the appropriate Sponsorship submission form using the Grant Portal on dsi.com, and it will be triaged to the



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appropriate internal department for input, as needed. Company Employees or Contingent Workers may not submit Sponsorship Requests on behalf of the Requesting Organization. The assigned representative within US Medical Affairs ensures that the proposal meets the Company's broad, business, therapeutic, or scientific funding objectives. All requests meeting broad objectives must be reviewed and either approved or rejected by the PGC.

Please note the following requirements for request submissions:

- Sales may submit exhibit or display request directly to the PGC.
- All Sponsorships, exhibits and display requests must be reviewed and approved by the PGC **before** the event takes place.
- If it is determined that part of the Sponsorship fits the criteria of a Grant, the requesting organization is asked to submit the Grant request via the grant portal on DSI.com.

8. MEMBERSHIPS

Memberships are fees paid to a Professional or Patient Organization for a Company Employee or the Company to receive specific, identified and documented benefits such as access to web sites, an organization's proprietary material, newsletters or the opportunity to provide input on industry, public policy, or healthcare panels or advisory councils.

Memberships may not be used to influence past, present or future prescribing, purchase or recommendation of Company products, or influence formulary position (managed care or hospital) or guidelines relating to Company products.

Membership fees may not exceed FMV as determined by PGC.

A signed written agreement is required to outline the specific nature of the funding and any benefits that are received by the Company.

Departments that may fund Memberships and Board Activities:

Funds for individual Membership fees may be provided by a variety of functions across the business. Requests must follow the required PGC request/approval process as described below.

Request / Approval Process:

All requests to purchase individual Memberships must be approved by an Employee's direct manager. Individual Memberships to organizations that qualify as Customers must also be approved by the Employee's functional head, and if approved, must be submitted to PGC for review and final approval using the PGC Portal and appropriate form. Organizations may submit Corporate Membership opportunities using the appropriate Grant request form on DSI.com.

Requests for funding corporate Memberships may be submitted by members of the



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departments that may fund these activities to the PGC for review and approval, using the PGC Portal. Organizations may also submit funding requests using the grant portal on DSI.com, and OGE will triage the request the appropriate internal department. All Memberships, whether initially submitted internally via the PGC portal or using the external form, must be reviewed and approved by the PGC.

7.1 Board Memberships

In the case of board Memberships, Employees are required to obtain approval from their manager, the department VP or functional lead and the VP of Human Resources before taking the position on the Board. Participants are required to avoid even the appearance of a conflict of interest and maintain the confidentiality of all proprietary or confidential information. If the Employee is unsure if a conflict of interest exists, they must contact Legal Affairs before engaging in such activity.

7.2 Participation in Third Party Advisory Boards

Opportunities to attend an industry advisory board, as a result of a Membership, may be used by Company Employees who have an expertise in the subject matter of the advisory board topics and where the subject matter is consistent with the Company's scientific or clinical platform. Participants are required to:

- Disclose their employment responsibilities at the Company,
- Avoid all promotional discussions,
- Avoid the appearance of a conflict of interest, and
- Maintain the confidentiality of all proprietary or confidential information.

It is important that Employees remain vigilant when attending any such meetings to refrain from any anticompetitive behavior and to remain in compliance with the **Fair Competition and Antitrust** policy (LEG-POL-022).

7.3 Membership events

Company Employees and Contingent Workers may attend an event funded by a Membership. However, attendance may not be used for promotional purposes. If tickets to an event are provided to the Company based on a Membership agreement (e.g. seats at a table for a gala event), these may be provided to Company colleagues with a necessary and legitimate reason to attend the event or returned to the event organizer. Tickets may not be provided to HCPs or Customers.



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9. MONITORING OF GRANTS

The Company has established monitoring procedures of its Grants process. Specifically, the Compliance Department performs periodic reviews of PGC submissions for Grants, Sponsorships, Memberships, and other types of industry support outlined in this Policy to confirm that the defined procedures, including required approvals, were followed. In addition, Compliance performs independent monitoring of DSI Employee and Contingent Worker interactions with HCPs and other Customers during Requesting Organization events through both live, field-based monitoring and review of selected data associated with the interactions.

The Company has in place a Grants Monitoring Program, which is part of the Compliance department, to review Grants. The Grants Monitoring Program reviews at least 30 medical education Grants and Charitable Contributions, combined, annually (including CME, non-CME, and other Grants and Charitable Contributions). Grants are selected either through risk-based targeting or random sampling. The Grant Monitoring Program reviews proposal documents (including grant requests), approval documents, contracts, payments and materials relating to the grant management system's review of the requests, and documents and materials relating to the grants. This review assesses whether the activities were conducted in a manner consistent with Company policies and procedures. Results from the Grants Monitoring Program including the identification of potential violations of policies, are compiled and reported to the Compliance Officer for review and follow-up as appropriate.

10. TRAINING EXPECTATIONS

This Policy shall be made available to all Employees via the Company intranet within 30 days of the Effective Date. It is recommended that all Employees engaged in the activities described herein, review this Policy prior to engaging in the referenced activities. To the extent that the owning department desires to assign training related to this Policy at their discretion, it is the responsibility of the owning department to deliver and track such training. In situations where the owning department proposes to utilize the Learning Management System (LMS) as the vehicle for training DSI Employees and Contingent workers who function in department(s) outside of the owning department, prior approval by the LMS Steering Committee is required.

11. ACTIVITY OWNER, KEY APPROVAL AND DOCUMENTATION

This Policy and associated training requirements are the responsibility of Compliance.



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12. COMPLIANCE

Failure to follow this Policy may subject an Employee to disciplinary action, up to and including termination. The assignment of any Contingent Worker who fails to follow this Policy may be ended (and/or subject his/her vendor employer to termination of the applicable vendor contract). Any Employee or Contingent Worker who becomes aware of an actual or potential violation of this Policy or any other policy must promptly report it to his or her manager, and/or one of the following Daiichi Sankyo, Inc. departments: Compliance, Legal Affairs, Human Resources, or the Compliance Hotline at (877-48ALERT) or the Compliance Hotline website (dsi.alertline.com). The Company follows a policy of non-retaliation, and no Employee or Contingent Worker will be subject to retaliatory action for reporting in good faith a suspected violation of this Policy.

13. POLICY REFERENCES, FORMS AND TEMPLATES

This Policy has been developed in consideration of the applicable state and federal regulations and industry guidelines including:

- FDA Guidance on Industry-Supported Scientific and Educational Activities
- OIG Compliance Program Guidance for Pharmaceutical Manufacturers
- PhRMA Code on Interactions with Healthcare Professionals
- ACCME Standards for Commercial Support of Continuing Education
- The Council of Medical Specialty Societies (CMSS) Code of Interactions with Companies
- International Federation of Pharmaceutical Industry Associations (IFPIA)
- The European Federation of Pharmaceutical Industries and Associations (EFPIA) Code of Practice on Relationships between Pharmaceutical Industry and Patient Organizations.

Policies	
Commercial Customer Interactions	COM-POL-001
Medical Customer Interactions	MDA-POL-001
Charitable Contributions and Product Donations	COM-POL-009
Vendor Arrangements Involving Interactions with Healthcare Professionals and Customers	LEG-POL-015
Gifts, Educational Items of Value, Meals and Entertainment Involving HCPs and Customers	COM-POL-003
Programs and Grants Committee Operational Policy	LEG-POL-024
Administrative Operating Procedures	
Speaker Selection and Contracting Procedure	FIN-AOP-026
Independent Investigator Research Proposals	MDA-AOP-004



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Programs and Grants Committee AOP	LEGAOP-010
Educational Grant Receipt, Review and Approval Procedure	MDA-AOP-011
PGC FORMS	
<ul style="list-style-type: none"> PGC Forms may be found on the DSI intranet site under Programs & Grants 	

14. ABBREVIATIONS AND DEFINITIONS

14.1. Abbreviations

Abbreviation	Term
AAFP	American Academy of Family Physicians
AANP	American Academy of Nurse Practitioners
AAPA	American Academy of Physician Assistants
ACCME	Accreditation Council for Continuing Medical Education
ACPE	Accreditation Council for Pharmacy Education
ANCC	American Nurses Credentialing Center
AOA	American Osteopathic Association
DSI	Daiichi Sankyo, Inc.
DSPD	Daiichi Sankyo Pharma Development Division
DSUSB	Daiichi Sankyo US Business
FMV	Fair Market Value
HCI	Healthcare Institution
HCP	Healthcare Professional
NLN	National League for Nursing
OIG	Office of Inspector General
OGE	Office of Grants and Education
PGC	Programs and Grants Committee
PMRT	Product Material Review Team
SOBC	U.S. Standards of Business Conduct

14.2. Terms

Term	Definition
Bona Fide Services	Services the Company reasonably requires to satisfy a previously identified, PGC-approved business need or purpose.
CME programs	Independent accredited CME program whereby participants receive educational credits for attending the program. Example: <ul style="list-style-type: none"> Third Party Organization CME program on CV Therapeutic Options



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Term	Definition
Company	Daiichi Sankyo, Inc. ("DSI"), which includes Daiichi Sankyo Pharmaceutical Development ("DSPD"), Daiichi Sankyo U.S. Business ("DSUSB"), and the U.S. Corporate Division ("USCD").
Contingent Workers	All individuals who provide services to the Company subject to a contingency. Typically, the contingency is a temporary need for services for a limited period of time, a select service, or a specific result/outcome. Contingent Workers include agency temporary workers, independent contractors, consultants, vendors, contract workers and fellows.
Corporate Sponsorship	Financial support to a for-profit or non-profit (501(c) (3), (c) (4), and (c) (6)) healthcare and non-healthcare related Organization, or HCI to conduct a non-educational event without a specific scientific or medical objective in which the Company receives some type of tangible corporate awareness benefit in return for its support.
Customer	Any entity involved in the purchasing, prescribing or reviewing for the purchasing or prescribing of a Company product including, but not limited to, purchasing groups, hospitals, medical schools, nursing homes, pharmacies, risk and non-risk bearing payers (e.g., PBMs, HMOs, PPOs, ACOs, etc.), physician groups, integrated health systems, drug wholesalers and distributors (primary or secondary), and federal and state government entities (e.g., CMS, VA, DOD, Federal Health Insurance Exchanges, etc.). "Customer" also includes any employees or staff of such entities involved in decisions related to purchasing, prescribing or review of Company products.
Educational Sponsorship	Financial support to a Professional or Patient Organization, HCI, or medical agency to conduct an event with a specific medical or scientific educational objective, congress, or other program in which the Company receives some type of tangible corporate or commercial benefit in return for its support.
Employee	An individual hired directly by the Company and paid through the Company payroll as an employee for an ongoing, indefinite period to perform work for the Company on a weekly schedule.



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Term	Definition
Fair Market Value (FMV)	The commercially reasonable amount of compensation that DSI is willing to pay, directly or indirectly, to a clinical investigator, institution or their agent in connection with the performance of a clinical study based on industry data.
Fellowship	Financial support provided to Professional or Patient Organizations or HCIs to support the educational development of HCPs in training or who are medical students, residents, or fellows.
Grants	An unsolicited request for financial support to Company from a Requesting Organization for support of a specific bona fide medical, scientific, or educational objective that is described in an agreement between Company and the organization and in which Company does not have control over content, presenter, attendees (in the case of a research Grant, any scientific protocol) and does not receive any Tangible Benefit. Solicited requests may be accepted, only in response to a specific Call for Grants Application posted by the OGE Examples: -Certified Continuing Medical Education Grants (CME) -Non-CME Educational Program Grants -Fellowships, Scholarships and Similar Educational Opportunities -Other Grants for academic research, patient advocacy or public policy initiatives.
Healthcare Charitable Contribution	Provision of financial support to Patient and Professional Organizations and institutions to support healthcare related activities. Examples: • Support for Highland Health Van for medical care of underserved NJ residents.
Healthcare Institutions	Hospitals and institutions of higher learning that provide medical education programs or conduct scientific research or other medical or scientific initiatives that may be of interest to DSI
Healthcare Professional (HCP)	All medical professionals including, but not limited to, physicians, medical students, nurses, nurse practitioners, physician assistants, pharmacists, and medical technicians. "HCP" also includes other employees or staff involved in purchasing or prescribing decisions including, but not limited to, formulary and P&T committee members.



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Term	Definition
Independent Investigator Study Research	Independent external investigator-initiated research in pre-clinical, clinical or health economics outcomes areas. Examples: <ul style="list-style-type: none"> • An independent researcher organizes a clinical study on the bioavailability of emerging compounds
Medical Scholarships and Fellowship programs	A fellowship program designed to support the education of junior faculty or emerging leaders, or a scholarship program designed to recognize professional excellence or commitment to patient/public health. Examples: <ul style="list-style-type: none"> • A Cardiovascular professional society establishes an annual fellowship program for junior faculty to mentor with senior members A local professional society establishes an annual scholarship program to recognize local leaders who advance health awareness
Memberships	Memberships are fees paid to a Professional or Patient Organization for a Company Employee or the Company to receive specific, identified and documented benefits such as access to web sites, an organization's proprietary material, newsletters or the opportunity to provide input on industry, public policy, or healthcare panels or advisory councils.
Non-CME programs	Independent non-accredited education, disease or public health awareness programs. Examples: <ul style="list-style-type: none"> • A physician organization organizes a Women's CV Health public awareness event • A physician organization develops a book on CV Patient Care Givers • A physician organization organizes a non-accredited education program for its members • A Diabetes Patient Organization organizes a walk-a-thon • A Cancer Patient Organization organizes an awareness program on patient access to care • A State Medical Society organizes a program to educate its members on healthcare reform



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Term	Definition
Non-healthcare Charitable Contribution	Provision of financial support to non-healthcare related Third Party Organizations to promote DSI goodwill. Examples: <ul style="list-style-type: none"> • A donation of financial support/supplies to a local community food bank • A donation of financial support/supplies to a disaster relief agency • A donation of financial support/supplies to a homeless shelter
Non-Profit 501(c)(3)	501(c)(3) organizations are commonly called 'charitable organizations. Contributions to 501(c)(3) organizations are tax deductible. Focus must be on public interest. 501(c)(3) organizations are restricted in how much political and legislative (lobbying) activities they may conduct. They may not participate in any campaign activity for or against political candidates.
Non-Profit 501(c)(4)	501(c)(4) organizations are defined as social welfare organization who must operate primarily to further the common good and general welfare of the people of the community (such as by bringing about civic betterment and social improvements). 501(c)4 organizations must not be organized for profit and must be operated exclusively to promote social welfare. Contributions to 501(c)4 organizations are not tax-deductible.
Non-Profit 501(c)(6)	501(c)(6) organizations are defined as having some common business interest, the purpose of which is to promote such common interest and not to engage in a regular business of a kind ordinarily carried on for profit. This includes business leagues, chambers of commerce, real estate boards, boards of trade and professional football leagues. Trade associations and professional associations are business leagues. To be exempt, a business league's activities must be devoted to improving business conditions of one or more lines of business as distinguished from performing a particular service for individual persons.
Product Material Review Team (PMRT)	The team of DSI Employees or Contingent Workers responsible for the review and approval of materials (internal and external) related to applicable products.



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Term	Definition
Professional and Patient Organization	For-profit and non-profit patient organizations and institutions dedicated to representing the medical and scientific endeavors of their constituents which may include prescribers, non-prescribing healthcare professionals and patients. Such organizations are focused on the improvement of health care and the practice of medicine.
Programs and Grants Committee	The committee that reviews commercial and development program requests and other arrangements involving payments to HCPs and/or Customers.
Requesting Organizations/ Requestor	Professional and Patient Organizations, medical education companies and Healthcare Institutions that are proposing external funding submissions.
Sponsorship	An externally submitted request that has Tangible Benefit implications for Company, and is evaluated by the OGE, and funded by the OGE or other Medical or Commercial function.



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15. REVISION HISTORY AND APPROVALS

15.1. Revision History

Revision Number	Previous Version Effective Date	Description of Change
8		MINOR UPDATE- Identified the need to align the Corporate Sponsorships definition on page 19 to the definition listed in the definition table
8		MINOR UPDATE- Updated the definition of Sponsorship to include healthcare and non-healthcare related organization not professional or patient organization.
8		Created a new category of sponsorship type: "Corporate Sponsorship" which would allow company funding on non-educational programs where we would receive corporate recognition benefits. Renamed the current Sponsorship category type as "Educational Sponsorship" to distinguish from the new category. New language inserted to require that all Sponsorship Requests be submitted by the Requesting Organization directly via the DSI.com portal.
7	June 22, 2020	Clarity provided around the departments that may fund CME and non-CME Grants (OGE and GMA). Clarified that Company funds for US patient advocacy-related non-CME grants may reside with OGE or Global Medical Affairs. Removed statement related to the CIA-related requirement to notify the OIG of the implementation of any new grant management system. Removed references to Government Affairs, which is no longer a department at DSI. Removed CIA from numbering.
6	October 14, 2019	CIA year 5 review/revisions. Updated standard Scope language to conform with organizational changes and identify which organizations & divisions to which this policy applies. Minor grammatical and typographical revisions made throughout.
5	October 25, 2018	CIA year 4 review/revisions. Changed title of Policy to be inclusive of Grants, Sponsorships and Memberships. New standard Scope language included to clarify which organizations & divisions to which this Policy applies.



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Revision Number	Previous Version Effective Date	Description of Change
		Clarified the roles of OGE, Global Medical Affairs, DSPD, and US Research & Development in the funding and approval of Grants. Updated to allow for solicited Grant requests to be accepted, only in response to a specific Call for Grants Application posted on dsi.com by the OGE. Added "Patient Advocacy Grants" as a type of Grant that the Company may fund. Updated the Policy References, Forms And Templates section. Minor grammatical and typographical revisions made throughout.
4	January 2, 2018	CIA Year 3 review. Minor updates to align to Grants AOP.
3	2/20/17	CIA Year 2 review. Update to terms, definition, Reporting and monitoring section 4.8.
2	3/10/2016	CIA Year 1 review. Addition of medical education companies to acceptable Grant recipients; redundant information reduced or eliminated.
1	3/25/2015	Changes to Incorporate CIA Requirements
0	May 21, 2013	Initial Version (Replaces existing policies LEG-POL-004 and LEG-POL-013)

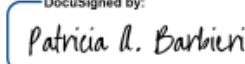
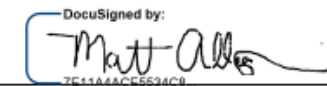
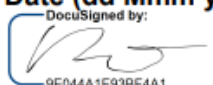


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15.2. Approvals

15.2. Approvals

APPROVED BY:		Effective: September 23, 2022
<u>Pat Barbieri</u>	<small>DocuSigned by:</small>  <small>4FC31C0B1B0C4B7...</small>	
Print Name	Signature	
<u>Sr. Vice President, General Counsel, Legal Affairs</u>	9/23/2022 12:48 PM EDT	
Title	Date (dd Mmm yyyy)	
<u>Matthew Allegrucci</u>	<small>DocuSigned by:</small>  <small>7E11A4ACE5634C8...</small>	
Print Name	Signature	
<u>Vice President, Chief Ethics & Compliance Officer</u>	9/23/2022 12:12 PM PDT	
Title	Date (dd Mmm yyyy)	
<u>Barry Fortner</u>	<small>DocuSigned by:</small>  <small>9E044A1E93BF4A1...</small>	
Print Name	Signature	
<u>Vice President, US Medical Affairs</u>	9/23/2022 1:04 PM EDT	
Title	Date (dd Mmm yyyy)	
Policy Author:	Eric Olszewski – Director, Policy & Training, Compliance	
Policy Reviewers:	Albert McCormick – Associate General Counsel, Legal Affairs John Ruggiero – Director, Head of the Office of Grants and Education,, Medical Affairs	

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16. Appendix

16.1. Summary of Grants, Sponsorships, Scholarships and Memberships

DESCRIPTION		EXAMPLES	BUDGET OWNER	REQUEST AND APPROVAL PROCESS
Memberships	<ul style="list-style-type: none"> • Purchase of a corporate or individual membership to a Third Party Organization • DSI may receive a tangible membership benefit in return such as corporate access to member information and events 	<ul style="list-style-type: none"> • Purchase a corporate membership to a non-profit organization; DSI receives access to the association's informational website and monthly newsletter • Purchase of an individual membership to a local, regional or national association; DSI colleague receives access to the association's informational website and newsletter 	<ul style="list-style-type: none"> • Medical Affairs • Public Affairs • Marketing • Sales • Various DSPD & US R&D functional areas • Global Medical Affairs • Global Marketing 	<ul style="list-style-type: none"> • DSI Employee gets approval from manager and department VP • DSI Employee submits request directly to PGC through PGC Portal • For Board /Corporate Memberships, VP of HR and PGC approval required.
Sponsorships - Third Party Meetings or Congresses	<ul style="list-style-type: none"> • Provision of funds to help educate or raise awareness of shared disease or scientific objectives • DSI receives tangible corporate or commercial benefit in return 	<ul style="list-style-type: none"> • Sponsoring a third party meeting and congress and getting exhibit space or promotional speaker opportunity in return • DSI receives a report or other information generated during a sponsored meeting (e.g., Roundtable Discussion Meetings); excludes educational activities at Congresses 	<ul style="list-style-type: none"> • Sales • Marketing • Medical Affairs • Public Affairs • Various DSPD & US R&D functional areas • Global Medical Affairs • Global Marketing 	<ul style="list-style-type: none"> • Third Party Organization submits request to Grant Committee using appropriate form on DSI.com • Submission by DSI departments that may fund Sponsorship requests via PGC Portal.
Grants	<ul style="list-style-type: none"> • Provision of unrestricted funds to help educate or raise awareness of shared disease or scientific objectives • DSI receives Corporate recognition in return 	<ul style="list-style-type: none"> • CME programs • Non-CME education & awareness events • Health Policy events • Medical Scholarships • Medical Fellowships • Academic Research Grants 	<ul style="list-style-type: none"> • Medical Affairs • Various DSPD & US R&D functional areas • Global Medical Affairs 	<ul style="list-style-type: none"> • Third Party Organization submits request to Grant Committee using appropriate form on DSI.com