

Intuitive Ethical Marketing Disclosure

Intuitive operates in accordance with the highest standards of business conduct in how it communicates with patients, customers, and healthcare professionals (HCPs).

The company's commitment to ethical practices for its sales and marketing programs is informed by our mission, vision, and values, which are laid out in Intuitive's [Code of Business Conduct and Ethics](#) Policy that guides how Intuitive interacts with surgeons, hospitals, healthcare systems and HCPs.

Our sales and marketing efforts aim to provide information to inform health decisions and customer choices.

Industry Standards

Intuitive's policies establish guidelines for employee behavior in the areas of sales and marketing, including regular assessments and audits of company practices. The company communicates these policies to all employees through robust new-hire and recurring training for all employees.

We require our employees to follow medical industry guidelines and abide by the laws and regulations in the countries where we operate. Through training for product marketing and clinical sales teams on advertising, promotion, and sales communication, we aim to provide information regarding the risks, benefits, and safe use of our products.

Advertising and Promotion

All Advertising & Promotion (A&P) materials, regardless of medium, go through an extensive documented review and approval process. Approvers represent a cross-functional group that includes regulatory affairs, legal affairs, clinical affairs, and global public affairs. Intuitive's approach to A&P includes:

- A concrete philosophy on the appropriate use of A&P materials. Our established process covers all A&P materials describing any claims for use, safety, performance, quality, features, financial or clinical efficacy, and/or reliability of products.
- Publications, abstracts, and/or presentations not developed or sponsored by Intuitive are also governed by this process if the material is used or distributed by Intuitive as part of any A&P activities.
- Clinical education materials and social media are managed with thorough training of employees and contractors on departmental operating procedures to ensure compliance.

Intuitive's Learning Management System continuously updates the training required for customer-facing personnel to reflect current standards and requirements. The guidelines defined within our A&P procedures state that:

- All A&P material are required to conform to U.S. Food and Drug Administration (FDA), international and other regulatory requirements and are within the scope of applicable regulatory clearances and approvals
- Any product-related content is truthful, accurate, and adequately substantiated, and any video or product placements comply with cleared indications for use through applicable regulatory bodies
- Any procedure-related content is accurate and adequately substantiated and complies with cleared indications for use through applicable regulatory bodies
- Intuitive, including employees, guest speakers, contractors, and consultants retained by Intuitive, may not promote procedures to a U.S. audience until they are cleared by the FDA.

Training for Sales and Marketing Teams

Customer-facing new hires on the sales and marketing teams take the Clinical and Sales Training (CAST), a comprehensive 12-week course that requires successful participants to demonstrate technical comprehension and proficiency when engaging with Intuitive technologies, as well as extensive knowledge of the clinical applications, company systems, and training in ethical sales and marketing practices when interacting with healthcare professionals. This training includes an overview of the relevant training requirements and guidelines for the A&P materials, and certifies that company employees can support their customers in the safe, effective, and cleared use of Intuitive products and technologies.

Compliance with all these training programs is required for continued employment, and all customer-facing employees such as field service technicians complete thorough training requirements that inform their approach to customers.

Transparency

Intuitive makes annual disclosure of all payments to healthcare professionals through the Centers for Medicare & Medicaid Services Open Payments database.