

The Sunshine Act and Our Commitment to Transparency

Health care professionals and hospitals are a vital part of our work to extend the benefits of minimally invasive surgery to the broadest possible range of patients, while providing extraordinary value. With the help of these important collaborators, we are able to advance education, training, product development, and clinical research efforts.

We value the input of the health care professionals and hospitals that have collaborated with us in these areas, and are committed to transparency around compensation or other transfers of value we have provided to them. Transfers of value include, among other things, meals or lodging costs associated with educational programs and other lawful courtesies provided in the course of doing business, compensation for consulting services, royalty payments, and others. We require all employees and company representatives to act ethically and in accordance with all applicable laws and regulations, including the Physician Payments Sunshine Act (Sunshine Act), implemented as part of the Patient Protection and Affordable Care Act (Section 6002).

The Sunshine Act requires certain pharmaceutical and medical device manufacturers, such as Intuitive, to track and report payments and transfers of value provided to covered recipients (defined as U.S. licensed physicians, physician assistants, nurse practitioners, clinical nurse specialists, certified registered nurse anesthetists, certified nurse midwives, and teaching hospitals) to the U.S. Centers for Medicare and Medicaid Services (CMS). The reportable periods under the Sunshine Act include the full 12 months of each calendar year and the data included in the 12 month period is required to be reported to CMS by March 31 of the following year. CMS will make the reported information available on the CMS website each June 30.

After we submit information to CMS, there will still be time to request clarifications or corrections. CMS allows covered recipients and applicable manufacturers to identify and resolve disputes through the CMS system for any payments or transfers of value they believe require correction. Further information on the Open Payments Program can be found at the following website:

CMS Open Payments Website:

<https://www.cms.gov/OpenPayments/Program-Participants/Program-Participants>

Please contact Sunshine.Inquiry@intusurg.com with any questions regarding Intuitive and the Sunshine Act.

