PROCEDURE TEMPLATE

Procedure on Funding for Third Party Events

# PURPOSE

This Procedure establishes requirements to follow Alcon’s *The Lens* policy requirements that govern funding of third party events in exchange for substantive *Promotional* opportunities. This procedure also reflects any additional and/or stricter requirements that apply under the local law or *Industry Code*. Local requirements are to be considered and applied in conjunction with *The Lens* requirements.

# SCOPE

This Procedure applies to all relevant [Insert company name] associates (“Associates”) who plan, organize, approve, or monitor [Insert company name] participation in third party events and to third parties [Insert company name] retains to assist with these activities.

# RESPONSIBILITY

[Insert company name] who plan, organize, approve, or monitor [Insert company name] participation in third party events are responsible for following this Procedure and for overseeing the actions of third parties retained to assist [Insert company name] with these activities.

# DEFINITIONS

Terms that are initial capitalized and italicized are defined in Alcon’s *The Lens* glossary.

# PROCEDURE

**5.1 Requests to fund local/regional events organized by third parties**

**a. Request content** – The request for funding must include the following information:

* + - Name of the organization seeking support from [Insert company name]
    - Contact information for individual who represents the requesting organization
    - Brochure, official letter, or other documentation that identifies the opportunities available to [Insert company name] and the proposed costs; examples of *Promotional* opportunities include (but are not limited to): ***[INSERT or REFERENCE the types of opportunities that are permitted locally, which may include: advertisements, leasing exhibit space for activities that are Promotional or medical, satellite symposia and related presentations, hotel key card advertising, providing welcome packets or meals to attendees, having Alcon’s name included in keynote lecture title, etc.]***
    - Tentative date, location, and venue details for the event
    - Program or outline of the proposed purpose and scope of the third party event*,* and
    - Anticipated number of targeted attendees.
    - ***[INSERT any additional information required for evaluation under local law or Industry Code, for example, whether or not you are the sole sponsor.]***

**b. Request submission process** –The request should be submitted for review through the local process. ***[INSERT or REFERENCE*** *the local process for submitting and approving the requests]*

**c. Approval**

*[****Specify*** *the local required approvers]*

1. **Review criteria** – Approvers are to verify that the following requirements are met:

* **Documentation and reasonableness of the cost of benefits received**

The benefits available to [Insert company name] must be documented and the costs to [Insert company name] must be reasonable for each of the benefits [Insert company name] will receive, which can vary according to the types of branding opportunities being offered. Consider applicable factors such as (without limitation):

* + 1. Size of exhibit booth area
    2. Number of anticipated attendees
    3. Historical costs for similar opportunities offered at the same or similar meetings
    4. ***[INSERT any additional applicable criteria under local law and Industry Code]***

Full evaluation consistent with the requirements of this procedure must be completed and approvals obtained in advance of providing any additional funding and prior to the actual occurrence of the third party event.

* **Meeting Purpose and Content** – The program or agenda must indicate thethird party event is a legitimate scientific or educational activity, or a retail activity that covers topics that are relevant to Alcon’s business and has a focus on topics related to the use of Alcon *Products*.
* **Venue** – The venue must be appropriate for the meeting purpose and comply with any additional requirements that apply under applicable local law or *Industry Code*. ***[Specify these if applicable]***
* **Funding recipient** – The organization seeking [Insert company name] funding must be evaluated as follows:

The recipient must not be an individual.

If [Insert company name] has prior experience with providing funding to the organization, verify that the organization used the prior funding for the purposes for which it was provided.

If [Insert company name] does not have prior experience with providing funding to the organization, public records must be obtained and retained as evidence that the organization is an established entity.

* **Number of funding sources** – Generally, it is envisioned that [Insert company name] will be one of several funding sources for the event.
* **No improper motivation for funding** – [Insert company name] must not provide funding for any event for the purpose of improperly encouraging or rewarding *Customer* business decisions related to Alcon Products.
* ***[Add any additional local law or Industry Code requirements, prohibitions, or limitations that apply to your ability to fund events.]***

1. **Additional requirements for activities being funded**

* All [Insert company name] activities being funded, such as *Promotional* *Materials*, *Promotional* speaker programs, meals, corporate branding, etc., must meet all Alcon requirements that apply to the respective activities.
* At scientific and educationalthird party events, *Promotional* activities must be clearly segregated from any scientific or educational activities in time or location.

1. **Post Third Party Event Requirements**

* ***Insert*** *local process to provide documentation that the opportunities you funded actually occurred.*
* Verify that all documents that supported the review and approval of funding for a third party event are retained for monitoring and auditing purposes. *[****Insert local process for maintaining a repository of these documents]***
* ***[Include the following if there are transparency reporting requirements that apply to any attendees:]***  Document names of any attendees who received *Items of Value* at an exhibit booth, and collect names from the third party event organizer of any attendees at meals funded by you, and document in appropriate company systems of record for local transparency reporting purposes.
  1. **SPONSORSHIP OF HCP DELEGATES TO THIRD PARTY EVENTS**

Passive sponsorship by [Insert company name] of *HCP* delegates to attend third party eventsis prohibited.

# REFERENCES – *The Lens* policy and reference table