PROCEDURE TEMPLATE

Procedure on HCP Consultant Engagements

# PURPOSE

This Procedure establishes requirements to follow Alcon’s *The Lens* policy requirements that govern engagement of *Healthcare Professionals* (“*HCPs*”) as consultants to provide services to [Insert company name]. 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”) to the scope of Alcon’s *The Lens* activities who plan, arrange, or approve *HCP* *Consultant Engagements* in regards of Alcon product portfolio and activities. This procedure also applies to third parties who engage in these activities on behalf of [Insert company name].

# RESPONSIBILITY

[Insert company name] associates who plan, arrange, or approve *HCP Consultant Engagements* that are within the above scope are responsible for following this Procedure and for overseeing the actions of any third party [Insert company name] retains to assist with these activities.

# DEFINITIONS

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

# REQUIREMENTS

* 1. **Request and Approval** – Prior to engaging an *HCP*, the requested engagement must be documented and approved as follows:

# Request for an Engagement *– INSERT or REFERENCE the local process to document a request for an HCP Consultant Engagement, to include:*

# *Description of the service needed*

# *Business need for the service, and*

# *Anticipated time frame within which the service is to be provided*

* + - **HCP Consultant Selection** –***INSERT or REFERENCE*** *the local process to assess and qualify an HCP consultant to provide the service (considering the HCP’s educational credentials, experience, and competencies in light of the service being contracted). Include any* ***limits*** *(e.g., frequency of HCP use or annual compensation limits) or* ***restrictions*** *(e.g., HCP ineligibility criteria such as government exclusions, loss of medical license, etc.) that need to be considered.*

# Approval

# *INSERT or REFERENCE the local approval process and specify approvers..*

# Fair Market Value (FMV) Rates – compensation to *HCP* service providers must not exceed the local *HCP* *FMV* rate. The local process for establishing *FMV* rates for *HCPs* is as follows: *INSERT the local process for establishing HCP FMV compensation rates and indicate where the rates can be accessed.*

# Engagement Contracting – a written agreement between [Insert company name] and the *HCP* must be signed before services are provided.

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* + - **Agreement Process** – ***INSERT or REFERENCE*** *local process to initiate and manage a written services agreement between an HCP and the Distributor.*
    - **External Approval or Notification** – Local law, Industry Code, or local employers may require that [Insert company name] either request approval or notify a regulatory authority or *HCP* employer before contracting with an *HCP* to provide services. When applicable, these requirements will be addressed as follows: ***INSERT or REFERENCE*** *local process to request approval or notify outside parties of HCP Consultant Engagements*.
    - **Transparency Reporting**– Local law or Industry Code may require that [Insert company name] reports the *HCP* services to designated regulatory authority or Industry Code association. ***INSERT or REFERENCE*** *local process to report HCP services for transparency purposes.*

# Payments Process – payments for *HCP* services are to be made in a transparent and traceable manner and *REFERENCE here the local finance function requirements for paying external service providers*.

# REFERENCES – Alcon’s *The Lens* policy