



Wright Medical Technology, Inc.

Grant and Charitable Donations Submission Guidelines

I. Purpose and Scope

Wright's commitment to foster charitable donations and giving, and to encourage research and education, is based on the principles of transparency and accountability by ensuring compliance with applicable laws and regulations, and preserving the integrity of the physician-patient relationship. This Grants and Charitable Contributions Policy (the "Policy") applies to all Company Representatives. It is intended to be consistent with the principles set forth in the Company's Code of Business Conduct, the Advanced Medical Technology Association Code of Ethics on Interactions with Health Care Professionals ("AdvaMed Code"), ACCME Essentials and Standards for Commercial Support, state and local laws, and the requirements of Wright's Deferred Prosecution Agreement and Corporate Integrity Agreement.

"Health Care Professionals" ("HCPs") include individuals and entities that are (1) involved in providing health care services and/or items to patients and (2) in a position to purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe Wright's products in the United States. The phrase Health Care Professional is to be interpreted broadly and includes both persons providing services (such as physicians, doctors of podiatric medicine (DPMs), physician assistants, nurses, operating room staff or consultants) and persons who do not provide services directly (such as administrative hospital or office staff), but who may be involved in the decision to purchase, lease, or recommend Wright products. Health Care Professionals also include purchasing agents, physician's practice managers and management within GPOs.

Agreements to provide support for Research and Educational Grants and Charitable Donations to organizations that are affiliated with HCPs shall be managed by Company employees who have no sales responsibilities and who report to the Chief Compliance Officer on issues relating to consulting services. These employees shall interface directly with the recipients on the terms of these agreements and on issues relating to payments. This means that discussions with recipients about the terms of the agreements or payments must be handled only by employees who report up through the Compliance function, or in very limited circumstances, by those individuals specifically directed by the Chief Compliance Officer to do so.

II. How to Apply

The Requestor should submit the required documentation, as outlined below, to the Wright grants mailbox at grants@wmt.com.

III. Required Documentation

- The Requestor's name, address, IRS tax identification number and a copy of the IRS tax-exempt determination letter (or other appropriate tax-exempt status documentation);

- A letter and a description of the organization's charitable, educational, or scientific purpose;
- A description of the specific educational or charitable event or other purpose for the funding;
- A detailed agenda of the event, outlining location, dates, time, speakers and topics;
- A detailed budget, outlining the event and speaker expenses;
- A completed W-9, signed by the organization;
- For medical missions, a list of the requested products to be provided by Wright, along with the purpose and ultimate destination for the use of the products; and/or a description of the requested equipment to be provided by Wright, along with the purpose and ultimate location of the equipment; and
- Completed [Certification of Compliance](#) from the Requestor.

IV. Eligibility

A. Wright will only provide grants and donations to support and encourage:

- the advancement of medical science or education;
- indigent care or medical missions;
- patient and public health education; and
- events where the proceeds are intended for charitable purposes.

B. Wright will not provide grants or donations:

- for research unless there is a written agreement defining the required procedures and protocol;
- where the budget for a proposed program appears to be unreasonable under the circumstances;
- to fund any fellowships for fellows who work with HCP customers, with the exception of fellowship funding to legitimate medical education foundations or institutions;
- to non-profit organizations that are, or appear to be, controlled by an HCP or an immediate family member of an HCP, or at which an immediate family member of an HCP is employed;

- to fund scholarships unless the recipients are medical students, residents, fellows, or others who are HCPs in training;
- where the circumstances are likely to improperly influence, or appear to improperly influence, medical judgment;
- where one purpose is to influence an HCP to purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe Wright's products;
- when the funds would be used to defray the requestor's ordinary operating expenses or overhead;
- when funds would pay for travel, housing expenses or time spent for doctors attending third party educational events;
- to fund educational events whereby social events or activities such as golf outings, leisure time, or other recreational activities, take precedence over the educational component are not considered high quality programs of significant educational value;
- when the funds would be used to directly fund payments for exhibit space, consulting or other services or goods provided to the Company, Company promotional activities or events, or any program where any of the speakers are Company employees; and
- when the funds would be in support of an event located at an inappropriate venue for an educational event such as ski, beach, spa, vineyards, or golf location.

Requests for funding to cover exhibit fees or displays, clinical studies or clinical research on Wright products, marketing or practice enhancement expenses should be directed to the Compliance Office and/or the Service Needs Review Committee (SNRC).

V. Special Requirements for Fellowships

Each fellowship request must be received from an authorized representative of the requesting organization and will be evaluated on the following criteria, in the sole discretion of the GRC:

- The fellowship must involve a course of in-depth study and instruction with significant educational value for the fellow that includes proficiency testing or evaluative processes administered by the recipient and the supervising or testing physician;
- The fellowship must be formally recognized by the Accreditation Council for Graduate Medical Education, the American Academy of Orthopaedic Surgeons, or other appropriate accrediting body;
- The requestor must submit an acceptable explanation of all direct revenues expected to be generated by the fellow, such as Medicare Graduate Medical Education payments,

other graduate medical payments attributable to the fellow, and any professional billing revenues generated by the fellow to the recipients or affiliates benefit;

- The fellowship selection criteria must be appropriate;
- For fellowship renewal, the fellow must provide an activity report summarizing the prior funded period (e.g. evaluation of the education experience, number of procedures performed, etc.);
- Fellowship compensation must be based on an independent survey, such as Medical Group Management Association cost survey; and
- The fellowship must not result in a direct benefit to the attending physician.

VI. Grant Review Process

Upon receipt of the grant request by Wright, the Grant Requestor will receive confirmation of the request by email.

The Requestor will receive written notification of the Company's decision upon completion of this review. Wright reserves the right to deny a grant or charitable donation request for any or no reason, in its sole discretion. Wright is under no obligation to provide an explanation for its decision.

To avoid delays and ensure a complete evaluation process, requests should be submitted at least 12 weeks prior to the event for which funding is being requested and should contain the required documentation as stated above.

Revised

Sept 2011



Wright Medical Technology Certificate of Compliance

A signed copy of this certification is required for any request for funding submitted to Wright Medical Technology, Inc. ("Wright"). Please include an executed Certificate with all submission documents.

This certification is intended to ensure compliance with all applicable laws, rules and regulations relating to this request for funding and the relationship to the parties, including but not limited to the federal anti-kickback statute.

I certify that to the best of my knowledge all of the following statements are true:

1. The requesting organization, its personnel, and I have not, implicitly or explicitly, solicited the requested funding in exchange for an agreement to purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe Wright's products.
2. No Wright representative has, implicitly or explicitly, offered funding to the requesting organization, its personnel, or me to purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe Wright's products.
3. The requesting organization, its personnel and I are not persons or organizations excluded from participation in Medicare, Medicaid or other federal healthcare programs by the Department of Health and Human Service's Office of Inspector General and are not barred from federal contracting by the General Services Administration.
4. All of the information included on and documentation attached to the request form is true and accurate.

Organization Name: _____

Requestor's Name: _____

Requestor's Title: _____

Area Code & Phone Number: _____

Signature: _____

Date: _____

If you have any questions about this Certificate, please notify Wright's Compliance Office by calling (901) 867-4349 or by sending an email to grants@wmt.com.