

POLICY

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Corporate Policy

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1. Purpose & Scope

1.1 Purpose

Mead Johnson Nutrition Company and its subsidiaries (“MJN” or “Company”) are committed to the ethical promotion and distribution of nutritional products for infants, children, and adults. As part of these efforts, MJN acknowledges that it is necessary to frequently collaborate with healthcare professionals (“HCPs”) and healthcare entities (“HCEs”) to assist in business development efforts, share clinical experiences, and educate HCPs, patients, and other stakeholders about important product-related issues. MJN is committed to promoting its products in a fair and balanced way, concentrating on science, health, and education. Recognizing the importance of responsible behavior, this Policy provides our global compliance standards when engaging HCPs and healthcare entities and sets forth the requirements to create and maintain local country policies. In interacting with the medical community, MJN is committed to following high ethical standards as well as applicable legal and regulatory requirements in order to ensure that the Company’s efforts do not have even the appearance of inappropriately influencing the use, or recommendation of, MJN products.

In some countries, HCPs who are employed full- or part-time by public hospitals, universities, institutions, or organizations are considered government officials (“GOs”) and public hospitals, universities, institutions, or organizations are considered government entities (“GEs”). This Policy applies to those HCPs and healthcare entities, regardless of whether they are also considered government officials or government entities. However, additional rules also apply to all individuals who are government officials or government entities. Please review MJN-CP-017, “Anti-Bribery and Related Matters,” for additional guidance on government officials or government entities.

1.2 Scope

This Policy is applicable to all employees and contractors of the Company (including any contractors, agents, or other third parties acting on behalf of MJN in interactions with HCPs or healthcare entities). Employees and contractors must also recognize that we operate in a complex regulatory environment and legal requirements vary depending on where we conduct business.

It is the responsibility of each local market to identify these requirements and to draft and implement local policies and procedures to support them. In light of these varying requirements, this Policy sets forth MJN’s minimum compliance standards with respect to interactions with HCPs and healthcare entities; however, where local standards, the WHO Code, or International Association of Infant Food Manufacturers’ (“IFM”) Rules of Responsible Conduct apply and require more stringent controls, local policies and procedures must be in place and followed.

As signatories to the IFM Rules of Responsible conduct, in certain jurisdictions, we are required to abide by additional requirements. IFM countries must adhere to MJN CP-3003, “Compliance with the IFM Rules of Responsible Conduct” and update local IFM policy with the control requirements outlined in this Policy. On an annual basis, General Managers in IFM countries must certify that their market is in compliance with IFM Rules of Responsible Conduct. For additional guidance regarding the application of the IFM Rules of Responsible Conduct, please see Appendices 1 and 2 in MJN-SOP-019, Interactions with Healthcare Professionals and Healthcare Entities.

For additional guidance regarding specific interactions, please consult your local policies and procedures. This Policy supersedes MJN-CP-019, dated May 22, 2013.

All interactions between MJN employees and HCPs are presumed to be work-related. At no time can MJN employees pay for company expenses with personal credit cards, or ask third parties to make such payments, for the purpose of avoiding compliance with this Policy.

2. Fee-For-Service Arrangements

MJN may engage qualified HCPs and healthcare entity personnel as speakers and consultants to provide bona fide and appropriate services to MJN, such as consulting on product development or product claims, participating in a MJN-sponsored advisory board, or speaking to HCP audiences on behalf of the Company. All MJN fee-for-service arrangements must meet the following requirements and be otherwise permitted by local laws and applicable MJN policies and processes.

- i. Qualified HCPs or healthcare entities may be engaged as consultants to provide business or strategic advice or perform business or scientific services, or as speakers to educate others on the company's products and / or other appropriate scientific, nutritional, or pediatric care topics.
- ii. Speakers and consultants must be chosen based on the appropriate expertise. The minimal number of speakers and consultants must be engaged to achieve the stated purpose. Several speakers and consultants must be evaluated before selecting the HCP(s) or healthcare entity personnel with the most appropriate expertise to accomplish the intended purpose.
- iii. In all circumstances, payments for such services must be for fair market value ("FMV") for a bona fide and legitimate business need that cannot be addressed by internal expertise or support, negotiated at arm's length, and in accordance with applicable standards developed by MJN.
- iv. All MJN speaking and consulting arrangements must be documented in advance in writing in a contract between MJN and the speaker or consultant using the applicable MJN-approved contract template. MJN must also document that the services were completed and actually used.
- v. The MJN employee who hires the speaker or consultant must be responsible for ensuring that timely and quality services are provided in accordance with the contract.
- vi. The primary focus of any meeting at which speakers or consultants are present must be on activities related to the speaker or consulting services. Meetings must be held in venues that are modest and appropriate to accomplish the business purpose.
- vii. MJN is only permitted to reimburse speakers or consultants for their reasonable expenses associated with the provision of the services (for example, meals, travel, and lodging). MJN never reimburses for personal expenses associated with speaking or consulting arrangements such as entertainment or expenses associated with a spouse or other guest traveling with the HCP. These venue and reimbursement requirements must be consistent with the Hospitality policy below, and with local policies, which dictate appropriate expenses.

- viii. Speakers or consultants must use MJN-approved materials in the course of providing speaking or consulting services such as speaking presentations on behalf of the Company and disclose that he or she is acting as a speaker on behalf of the Company.
- ix. MJN must never use speaker or consulting arrangements as an inducement to a HCP or healthcare entity to use, prescribe, purchase, or recommend MJN products, reward past purchases, or influence research results.
- x. Some Fee for Service activities may require consideration of an HCP with international experience or reputation. An international (rather than local or regional) HCP might be considered when :
 - a) attendees are international in nature; and
 - b) prestige of the event is highly regarded; and
 - c) there is a need for highly specialized subject matter expertise held only by a select few individuals globally

3. Promotional Materials

Where permitted by local authorities, promotional materials may be disseminated to HCPs and healthcare entities to promote MJN products. These aids are intended to promote an understanding of product claims, thus contributing to customer care. All promotional content produced or disseminated by the Company must be accurate, scientifically sound, objective, reflect the current state of knowledge and, where applicable, consistent with the label information as approved by local regulatory authorities.

For IFM countries: Sales and marketing personnel shall make retailers and those other parties involved in bringing the covered products to market aware of the importance of complying with all relevant laws, regulations, and codes of practice. In this context, covered product means breast-milk substitutes and follow-on formula for infants from birth to the first twelve months of life, unless applicable law prescribes a different age (whether higher or lower).

3.1 Utilization of Branded and Unbranded Materials

Branded and unbranded materials are required to be reviewed and approved through the Labelling Excellence (LEX) Approval Process. The LEX Approval Process confirms that the information contained in materials is fair and balanced, accurate and – where and when available – based on clinical data, appropriate for the audience, and consistent with local regulations on advertising to consumers and HCPs. The Global LEX Policy requires each MJN market to adopt and follow a LEX SOP at the local or regional level and requires employees to use only sales and marketing materials that have been reviewed and approved under such SOP. The local or regional SOP should be formally approved by Regulatory, Law and Marketing, and the LEX Approval Process in the SOP should include the following functional reviewers as documented in the SOP:

- i. An approval by Regulatory and/or Law;
- ii. An approval by Marketing;

- iii. Review by Medical and/or Nutrition Science when Regulatory and/or Law determines the subject matter requires such additional review).

For detailed policy guidance on the LEX Approval Process, refer to Global LEX Policy MJN-CP-3001.

3.2 Detailing

Where permitted by local authorities, MJN sales representatives may interact one-on-one or with a group of HCPs or healthcare entity personnel to discuss product, product-related service details, and scientific information on a product's potential uses and benefits. MJN personnel are prohibited from compensating a HCP or healthcare entity employee for the HCP or healthcare entity employee's time or participation in a detailing session. Materials used for detailing may only be those that have been reviewed and approved through the LEX Approval Process as noted in section 3.A above.

4. Sponsorships, Grants and Charitable Contributions

4.1 MJN Meetings and Events Support

MJN may hold educational and product training meetings regarding MJN products for HCPs and healthcare entity personnel which meet the following requirements and are otherwise permitted by local laws and applicable MJN policies and processes.

- i. MJN-sponsored meetings may be either independent events or held in conjunction with a third-party medical conference.
- ii. The purpose of such meetings must be to provide bona fide education or product training for HCPs and healthcare entity personnel. Any materials shared must be accurate, scientifically sound, objective, and reflect the current state of knowledge.
- iii. Meetings must be held in venues that are modest and appropriate to the business purpose and, where practical, with reasonable airport access. Meetings where most of the attendees are from one country cannot be held in another country without good reason, for example, reasons of security.
- iv. Meals, receptions, and hospitality offered during the meeting must be modest and appropriate. Budget limitations imposed by applicable MJN processes must be followed.
- v. Financial support for such meetings must never be used towards attendance by spouses or other guests unless their credentials have qualified them independently for financial support from MJN.
- vi. MJN must never sponsor its own meetings as an inducement to a HCP or healthcare entity personnel to use, prescribe, purchase, influence, or recommend MJN products or reward past purchases.

4.2 Sponsorships to Attend Third Party Meetings and Events

MJN provides financial support to HCPs attending medical conferences and medical education events that are organized, developed, and hosted by third party organizations. Such events may be hosted by medical professional societies or third party vendors that provide continuing education to HCPs. MJN provides financial support to sponsor HCP attendance under the following circumstances where permitted by local laws and applicable MJN policies and processes.

- i. MJN may only provide financial support to HCPs or healthcare entity personnel attending third-party medical meetings if the meeting agenda is relevant to the recipient's medical practice or specialty.
- ii. Financial support provided to a HCP to attend a third-party meeting or event cannot be used to pay the costs of attendance by spouses or other guests, unless their credentials have qualified them independently for financial support from MJN.
- iii. MJN must never provide financial support for HCP attendance at third party meetings, as an inducement to a HCP or healthcare entity to use, prescribe, purchase, influence, or recommend MJN products or reward past purchases.

4.3 Sponsorship of Third Party Meetings and Events

MJN provides financial support to third party organizations for medical conferences and medical education that are organized, developed, and hosted by those third party organizations. Examples of such meetings include medical conferences, symposia, and congresses. MJN provides financial support for such meetings under the following circumstances where permitted by local laws and applicable MJN policies and processes.

- i. The primary purpose of the meeting must be to further scientific exchange and / or promote medical education.
- ii. The venue for the meeting must be modest and appropriate to serve the bona fide scientific or educational purpose of the meeting.
- iii. MJN must never provide financial support for third-party medical meetings as an inducement to a HCP or healthcare entity to use, prescribe, purchase, influence, or recommend MJN products or reward past purchases.

4.4 Visits to MJN Facilities

MJN may host educational and product training meetings regarding MJN products for HCPs and healthcare entity personnel at its own facilities, which meet the following requirements and are otherwise permitted by local laws and applicable MJN policies and processes.

- i. Where permitted, and only after approval from a member of the MJN Law Department, MJN employees may invite HCPs or healthcare entity personnel, on an infrequent basis, to visit a particular MJN facility to demonstrate or explain the Company's products.

- ii. Prior to any MJN facility visit, employees must document an agenda and detail the need for the visit.
- iii. Any materials shared with visitors to MJN facilities must be accurate, scientifically sound, objective, and reflect the current state of knowledge, and reviewed and pre-approved in accordance with the LEX Approval Process, “Global LEX Policy MJN-CP-3001.”
- iv. MJN must never host meetings at its facilities as an inducement to a HCP or healthcare entity employee to use, prescribe, purchase, influence, or recommend MJN products or reward past purchases.

4.5 Grants

MJN may provide grants to reputable institutions, organizations, associations for, in limited situations, advancement of science or patient and public education in relation to a relevant and appropriate purpose. All MJN grants must meet the following requirements and must be otherwise permitted by local laws and applicable MJN policies and processes:

- i. Grants may occur only under the conditions specified by local policies. All requests must be received in writing from a third-party organization for purposes of conducting bona fide scientific or educational activities.
- ii. Requests for funding are reviewed based on their merits and in accordance with all applicable laws, regulations, professional requirements, and industry codes of conduct or practice.
- iii. Marketing may identify high-level areas of opportunity or organizational focus, such as pediatric nutrition, pre-term infant care and support, and similar categories of care related to one or more MJN products.
- iv. Grants must be provided without any expressed or implied benefit in return, other than general goodwill, which cannot contain commercial benefit. Such funding cannot be used to influence or reward the individual or organization for present, past, or future use or recommendation of MJN products.
- iv. In very limited circumstances, MJN may consider a Grant to a government-sponsored entity. These must be pre-approved by Risk & Compliance.

4.6 Charitable Contributions

MJN may provide charitable contributions to reputable institutions, organizations, or associations to support established charities and third party foundations. All MJN charitable contributions must meet the following requirements and must be otherwise permitted by local laws and applicable MJN policies and processes:

- i. Charitable contributions may occur only under the conditions specified by local policies. All requests must be received in writing from the potential recipient entity or organization. MJN

cannot accept requests from an HCP for Charitable Contributions to any cause or organization.

- ii. Requests for funding are reviewed based on their merits and in accordance with all applicable laws, regulations, professional requirements, and industry codes of conduct or practice. Additional limitations may exist if the charitable organization provides funding or cost-sharing to patients or providers, subject to local law.
- iii. Marketing may identify high-level areas of opportunity or organizational focus, such as pediatric nutrition, pre-term infant care and support, and similar categories of care related to one or more MJN products.
- iv. Charitable contributions must be provided with charitable intent and without any expressed or implied benefit in return, other than general goodwill, which cannot contain commercial benefit. Such funding cannot be used to influence or reward the individual or organization for present, past, or future use or recommendation of MJN products.
- v. Monetary contributions must be paid into the organization's account, and donated goods must be delivered to the competent department of the recipient.
- vi. In very limited circumstances, MJN may consider a Charitable Contribution to a government-sponsored entity. These must be pre-approved by Risk & Compliance.

5. Gifts and Hospitality

5.1 Gifts

All gifts provided at no charge to HCPs, including non-cash, practice-related items, must meet the following requirements and be otherwise permitted by local laws, applicable industry standards, institutional restrictions, and applicable MJN policies and processes:

- i. Practice-related items may be provided at no charge to HCPs if such items are of minimal value and only if given on an occasional basis.
- ii. Corporate logos may appear on practice-related or other items if permitted by local law and applicable MJN policies and processes, but in some countries infant formula brand names may not be permitted on such items.
- iii. If permitted by local law and applicable MJN policies and processes, inexpensive items unrelated to the HCP's practice may be provided on an infrequent basis in acknowledgement of significant national, cultural, or religious events.
- iv. Local law and applicable MJN policies must be used to determine whether a gift is appropriate for the region or country. Examples of inappropriate gifts include cash or cash equivalents, wine or alcohol, gift certificates, or sports or other entertainment tickets. Appropriate gifts might include pens or notepads.

- v. MJN may never provide practice-related and other items to HCPs or healthcare entities as an inducement to a HCP or healthcare entity to use, prescribe, purchase, influence, or recommend MJN products or reward past purchases.

5.2 Hospitality

MJN may from time to time in connection with consulting arrangements, product training, and certain education activities provide modest hospitality to HCPs to facilitate appropriate meetings and interactions with HCPs. Any provision of accommodations, travel, and meals to HCPs must meet the following requirements and be otherwise permitted by local laws and applicable MJN policies and processes:

- i. MJN-organized meetings must be held in venues that are modest and business appropriate with reasonable airport access. MJN may not organize or fund events at extravagant or otherwise inappropriate places. MJN local policy must define appropriate venues in accordance with local laws and regulations.
- ii. MJN may occasionally provide modest business meals as an incidental component of an otherwise approved business, scientific and / or medical education arrangement or event. To accommodate the schedules of HCPs, mealtimes may be the only opportunity to meet with some HCPs.
- iii. Business meals with HCPs must be modest as defined by local standards, must not be part of a recreational event or entertainment, and must be provided in a manner conducive to informal communication. It is never appropriate to provide a meal to a HCP without a MJN employee present.
- iv. Expenses submitted by MJN for business meals with HCPs or customers must be submitted in accordance with applicable MJN expense approval and reimbursement procedures.
- v. MJN prohibits stand-alone entertainment (or other recreational, leisure, or social activities) in the course of a HCP's or healthcare entity employee's engagement, meeting, or other such interaction. The prohibition seeks to ensure that all interactions with HCPs are for a legitimate business, scientific, and / or medical education purpose and not to induce the use or recommendation of MJN products, or reward past purchases of MJN products. Examples of such entertainment include, but are not limited to, tickets to a sporting event or theater, vacation trips, or sporting equipment.
- vi. Expenses submitted by the HCP for reimbursement must be incurred by the HCP and be reasonable and incidental to the legitimate services provided to MJN. Unnecessary expenses such as lodging or meals past the term of the engagement are prohibited, and the HCP is expected to arrive as close to the beginning of the meeting and leave as close to the end of the last meeting as can be reasonably expected.
- vii. Modest accommodation, travel, and meal expenses directly incurred by those providing legitimate services to MJN during the course of the defined engagement may be paid for or

reimbursed by the Company. Air travel can only be provided when the meeting cannot legitimately be held closer to the HCP(s) attending the event.

- viii. MJN prohibits reimbursement of expenses or the provision of meals, travel, or accommodations for spouses or other guests of a HCP attending a MJN event unless their credentials have qualified them independently to be invited to the same meeting.
- ix. MJN prohibits reimbursement of expenses or the provision of meals or travel as an inducement to a HCP or healthcare entity employee to use, prescribe, purchase, influence, or recommend MJN products or reward past purchases.

6. Product Provision

In certain countries where MJN operates, there are specific regulations that dictate permitted use of product provisions.

6.1 Products for Professional Evaluation (“PPE”) (Applies to IFM countries only)

Products for Professional Evaluation enable HCPs and healthcare entities to gain experience on the efficacy of the Company’s portfolio products profile, including evaluating tolerance and acceptability. If providing product provisions is permitted in your country, a local policy must exist to provide specific guidance on the circumstances, frequency, and amounts allowed.

- i. Providing Products for Professional Evaluation to HCPs and healthcare entities must strictly follow local laws and, where applicable, the World Health Organization’s (WHO) Code of Marketing of Breast-Milk Substitutes and / or the Infant Food Manufacturers (IFM) Commitment and Rules for Responsible Conduct, and applicable MJN policies and processes.
- ii. For IFM countries, the label or container of the Product for Professional Evaluation shall clearly bear the indication that it is a “sample for professional evaluation” or “not for resale” or similar notation.
- iii. Distribution of Products for Professional Evaluation shall be limited in regularity and quantity to avoid excessive allocation of Products for Professional Evaluation to HCPs and healthcare entities.
- iv. MJN may never provide Products for Professional Evaluation as an inducement to HCPs or healthcare entities to use, prescribe, purchase, influence, or recommend MJN products or reward past purchases.

6.2 Samples (Applies to non-IFM countries)

Samples and associated accessories intended for trial use may be provided to HCPs and healthcare entities, in order to provide patients and HCPs an opportunity to become more familiar with MJN products.

- i. Samples may be distributed only in accordance with local laws and applicable MJN policies and processes.
- ii. MJN may never provide samples to HCPs or healthcare entities as an inducement to a HCP or healthcare entity to use, prescribe, purchase, influence, or recommend MJN products or reward past purchases.

7. Product Purchase or Use Agreements (Verbal or Written)

7.1 Written Bids, Tenders and Contracts

Bids, tenders, and contracts are processes and means by which a public or private hospital or hospital system or payer negotiates the price and term of use. A written agreement between the manufacturer and the healthcare entity is typically created that defines the term of use of the manufacturer's product.

- i. Bids, tenders and contracts involving HCPs or healthcare entities must be conducted consistent with local law and applicable MJN policies and processes. In connection with such activities, MJN may never use inducements to a HCP or healthcare entities to win business or to use, prescribe, purchase, influence, or recommend MJN products or reward past purchases.
- ii. Consult a member of MJN's Law Department before proceeding with such arrangements.

7.2 Verbal Feeding Agreement

A feeding agreement means an agreement between a manufacturer and a HCP or healthcare entities that defines term of use for the manufacturer's product.

- iii. A written feeding agreement is the preferred practice. However, in some jurisdictions, verbal agreements are locally acceptable and legally binding. You must first obtain approval from a member of MJN's Law Department before proceeding with verbal feeding arrangements.
- iv. If the MJN Law Department provides approval to proceed with a verbal feeding agreement, then the arrangement can proceed only in compliance with all local laws and applicable MJN policies and processes.

8. Other Activities and Considerations

8.1 Clinical Trials

Clinical Trials must be conducted in a manner consistent with local laws and applicable MJN policies and processes, and may never be used as an inducement to HCPs or healthcare entities to use, prescribe,

purchase, or recommend MJN products, reward past purchases, or influence research results. Any activity must be pursued in coordination with the Global Medical Affairs Team.

8.2 Scientific Publications

Scientific Publications must be conducted in a manner consistent with local laws and applicable MJN policies and processes, and may never be used as an inducement to a HCP or healthcare entity to use, prescribe, purchase, or recommend MJN products, reward past purchases, or influence research results. Any activity must be pursued in coordination with the Global Medical Affairs Team.

8.3 Market Research

Market research activities involving HCPs or healthcare entities must be conducted consistent with local laws and applicable MJN policies and processes, and may never be used as an inducement to a HCP or healthcare entity to use, prescribe, purchase, or recommend MJN products, reward past purchases, or influence research results. Consult a member of MJN's Law Department before proceeding with such arrangements.

9. Contact Information

9.1 Advice and Questions; Exceptions

If you ever have doubt about the right course of action, or if you have questions about this Policy or compliance with the law, please consult a member of MJN's Compliance Department.

While exceedingly rare, any exceptions to this Policy must be pre-approved in writing by the country GM and a member of the MJN Risk & Compliance Department.

9.2 Raising Concerns

As set forth in the MJN Code of Conduct, if you become aware of a situation that may involve a potential or actual violation of this Policy or other wrongdoing that affects our business, you have a duty to speak up and report the issue as soon as possible. MJN has established several methods of raising issues and concerns set forth below, as listed in MJN's Standards of Business Conduct and Ethics, any of which are appropriate to use in the event you have a concern to report or question to raise. Regardless of the specific method used to report, potential violations must be escalated promptly to the Compliance Department:

- i. Any manager or supervisor
- ii. Your local Human Resources representative
- iii. A Legal representative supporting your business
- iv. A senior member of the Risk & Compliance Department
- v. A senior Finance representative or the Corporate Controller
- vi. A representative from Global Corporate Security

- vii. The Company's confidential, toll-free Integrity Line staffed by an outside company:
- a) For calls from the U.S. and Canada, please dial 877-772-6746 for direct access.
 - b) For international calls, please use an outside line to dial the International Toll-Free Service number for your location (available at www.mjn.alertline.com) and follow the instructions provided by the local operator. In some countries, calls to the Integrity Line require AT & T access codes which are available on www.mjn.alertline.com. At the prompt dial 877-772-6746.
 - c) The Company's confidential online reporting tool at www.mjn.alertline.com.

Any employee or third party may also report a concern regarding any accounting, internal accounting controls, or auditing matters directly to the Audit Committee of the Board of Directors, by sending a letter to:

Chair, Audit Committee
Mead Johnson Nutrition Company
2701 Patriot Blvd., 4th Floor
Glenview, IL 60026

Direct Questions about this Procedural document to:

Mead Johnson Nutrition Company, Risk & Compliance
2701 Patriot Blvd., 4th Floor
Glenview, Illinois 60626

10. Discipline for Non-Compliance

MJN may take disciplinary action against its employees and contractors, up to and including termination or cancellation of contract, as applicable, for failure to comply with this Policy.

11. Definitions

Advisory Boards and Counsels: A group meeting of 3 or more paid consultants, at least one of whom is a HCP or employee of a healthcare entity, retained by MJN to provide Company specific business advice, or knowledge-enhancing scientific information for MJN products or MJN areas of interest. Examples could include: Global Allergy Advisory Board, Chicago Neonatal Intensive Care Unit (NICU) Advisory Board to discuss Enfamil Liquid Human Milk Fortifier and nutrition for the neonate; Nurse Advisory Board to discuss Nurse Connections Program; PNI Brain Research Advisory Board to help shape MJ research priorities.

Bids & Tenders: A process in which public or private hospital or hospital system or payer negotiates the price and term of use. Examples could include: Women, Infants and Children (WIC) or Requests for Proposals (RFPs) or hospital contracting or Group Purchasing Organization (GPO) contracting, or Government Tenders or reimbursement application.

Charitable Contributions: Providing funds with charitable intent without any expressed or implied benefit in return, other than general goodwill, which cannot contain commercial benefit. Charitable contributions are to reputable institutions, organizations, or associations to support established charities and third party foundations; never to individuals.

Consultants: A healthcare provider, healthcare organization, medical or scientific advisor, or company retained by MJN to provide consultancy services to the Company.

Consultant Engagement: Paid services by MJN in which HCPs, or healthcare entity personnel retained by MJN to provide bona fide Company specific business advice or knowledge-enhancing scientific information for MJN products or MJN areas of interest. Examples could include: HCP advice and/or development of a Medical Education program (eg. Allerni, nurse board to develop Nurse Medical Education Program), Contract Consultant, Advisory Board (NICU advisory board to discuss/evaluate MJN NICU portfolio, PNI brain research advisory board to help shape MJN research priorities, product claims development), Expert Panel (Allergy expert panel to review and comment on latest science related to Cow's Milk Allergy).

Continuing Medical Education: Educational or professional development activities directed at HCPs to increase HCPs' knowledge of a disease state, treatment options, or other medical or scientific information.

Contract: A written agreement between a manufacturer and a HCP or healthcare entity that defines term of use for the manufacturer's product.

Detailing (Group and 1 on 1): A meeting between a manufacturer and a group of HCPs and / or healthcare entity personnel that is used to provide product, product related service details and scientific information on a product's potential uses and benefits.

Entertainment: Providing HCPs or healthcare entity personnel with any activity resulting in amusement or enjoyment, unrelated to the scientific or business purpose of such interaction. Examples include sporting activities, sightseeing, bars, nightclubs, concerts, or gambling.

Fee For Service: A charge or payment for a bona fide service for MJN

Gifts: Anything of value, including but not limited to goods, services, food items, gimmicks, business courtesies, or other non-financial benefits provided as a mark of appreciation or business relationship not in exchange for commercial benefit. Examples could include: USB drives containing scientific literature, Medically-related text books, Pens, Note pads, Plaques or recognition.

Grants: Support (usually monetary) provided to a third party participating in scientific / medical educational activities that are non-promotional in nature, and that are developed independently by the third party without influence or control from the company, for the purpose of furthering the adoption of evidence-based medicine in therapeutic areas of interest to the company, and with the intent to improve patient and population health. Examples could include: restricted or unrestricted Grant to an

independent University education program, Professional Association Training (ESPGHAN and LASPGHAN GI Fellow Summer School).

Healthcare Entity (“HCE”): An organization that is comprised of HCPs or academic institutions, specialty societies, or patient care organizations that provide healthcare services or conduct healthcare research or training. Healthcare entities include hospitals, pharmacies and any other entities which purchase or dispense prescription pharmaceutical products in in- or out-patient settings. Healthcare entities also include any entities which reimburse or pay for prescription pharmaceuticals such as sovereign or government health funds, insurance companies and other payers.

Healthcare Professional (“HCP”): Any person who provides health care services or who is otherwise in a position to administer, influence, or recommend the purchase or use of MJN products. This includes but is not limited to: nurses, physicians, physician assistants, midwives, medical residents, and members of the formulary committees. HCPs can work in a variety of settings, including: private offices, hospitals, clinics, universities, and other scientific institutions.

Government Officials: Government Official includes any officer, full- or part-time employee, or person acting in an official capacity for a local or national government; a government department, agency, or instrumentality; a commercial enterprise owned or controlled by a government; or a public international organization. For additional guidance, please see MJN-CP-017 (“Anti-Bribery and Related Matters”).

Hospitality: Interactions or meetings that include meals or beverages (according to local standards), lodging, or transportation provided to HCPs or healthcare entity personnel, with a genuine informational, scientific, business, or educational discussion or presentation. Examples could include: Snacks at Medical conventions, Lunch for an in-clinic meeting, Meals provided during a PNI facility visit, Lodging provided during a consulting engagement, Transportation provided during a consulting agreement, Offsite (out of HCP office) meeting at a restaurant to educate a small group (<15 people) of HCPs on MJN products, Offsite (out of office) meeting at a restaurant to educate an individual HCP on MJN products.

Lodging and Transportation: Accommodation, travel, and other incidental expenses paid or reimbursed by the Company and incurred by HCPs or healthcare entity personnel.

MJN Meetings and Events Support: Costs associated with execution of events / meetings attended by HCPs or healthcare entity personnel where MJN business and / or scientific information are discussed. Examples could include: MJN Cow's Milk Allergy Symposium, MJN Nutrition of the Preterm Infant Medical Education Meeting, MJN Allergy Day Medical Education Event, MJN Cognitive Development in Infants Symposium, KOL speakers bureau lectures, MJN Annual Latin America Pediatric Conference, MJN hosted Nurse conference, MJPNI Meetings and Symposia.

Market Research: An organized effort to gather and interpret information to inform business strategy and practices.

MJN Sponsored Studies: A study initiated and fully funded / monitored by MJN.

Products for Professional Evaluation (“PPE”)(Applies to IFM countries only): A small quantity of covered products (For IFM covered countries: maximum of 500 grams or the smallest container) offered by MJN for that particular market. PPEs are not free goods

Product Provision: A supply of company products and associated accessories intended for trial use.

Product Purchase or Use Agreements: Agreements to secure and provide MJN products in the medical customer's place of patient interaction.

Promotion: Interactions by MJN or on behalf of MJN to communicate information on pediatric nutrition science or MJN products to HCPs or healthcare entity personnel.

Promotional Activities: Activities undertaken, organized, or sponsored by or on behalf of MJN that is intended to promote the prescription, recommendation, supply, administration, sale, or consumption of our products.

Samples (Applies to non-IFM countries only): Company product and associated accessories provided to HCPs or healthcare entities, intended for trial use, to provide patients and HCPs an opportunity to become more familiar with MJN products. Samples are not free goods.

Speaker: A HCP engaged by MJN to speak on behalf of the Company.

Speaker Engagement: MJN engages HCPs to speak at events to share relevant scientific / educational information and educate others on pediatric nutrition science, the Company’s products and / or topics pertaining to the care of infants and children. Examples could include: MJN paid speakers at a scientific lecture, Speaker at an open or closed Scientific Symposia , HCP radio, TV, internet or video testimonials, HCP web-based speaking engagement.

Sponsorship: Support (financial or product) provided to a third party or HCP related to a meetings, event, grant or charitable contribution.

Sponsorship to Attend Third Party Events: Financial support provided by the company to fund the attendance by HCPs at congresses and conferences managed by third parties. Examples could include: HCPs registration fee to attend a congress (ESPGHAN, AAP, PAS etc), Travel scholarship for a HCP to attend a medical congress or medical education event, HCP sponsorship to attend a National or regional medical conference.

Sponsorship of Third Party Meetings and Events: Sponsored meetings / events that provide product, disease state, or other product-related information to HCPs for promotional or non-promotional reasons. Examples could include: Accredited Continuing Education programs (eg. Annenburg), Non-accredited Continuing Education programs (eg. ESPGHAN symposium), Congresses (ESPGHAN, AAP, PAS etc), Local and/or regional HCP professional association, Continuing Medical Education, Nonexclusive External Sponsorship of 3rd Party Events.

Third Parties: Any third party, such as: agents; travel agents; suppliers; distributors; joint venture partnerships; or research partners.

Utilization of Branded Materials: Product branded materials utilized with / by HCPs or healthcare entities, to promote and / or educate MJN products for customer use. These aids are intended to promote and / or educate an understanding of product claims related to usage, prescription, consumption, or sales of a company product. Examples of materials that may be branded: Medical sales detailer (i-pad, printed etc), Public relations materials (press release etc), Literature distributed or displayed at a medical conference, Promotional activities during a CME event (inside or outside of presentation venue depending on local regulations), Medical education slides, Digital content, Slide deck for KOL speakers bureau.

Utilization of Unbranded Materials: Non-product branded materials utilized with / by HCPs or healthcare entities to inform about the use, target population, safety, efficacy related to a company product. Examples of materials that may be unbranded: Unbranded medical sales materials, Public relations materials, Abstract, Reprints, Manuscripts, Congress Presentations and Posters, Digital content, Brochures, CME invitations, Slide deck for KOL speakers bureau.

Verbal Feeding Agreements: An un-written agreement between a manufacturer and a HCP or healthcare entity that defines terms of use for the manufacturer's product.

Visits to MJN Facilities: Invitations, by MJN personnel, to HCPs or healthcare entity personnel to visit a particular MJN facility (such as the Pediatric Nutrition Institute) to demonstrate / explain the Company's products; exchange knowledge-enhancing or scientific, nutritional information; or to obtain appropriate business advice. Examples could include: Visit to PNI, Visit to MJN office, Visit to Manufacturing facility.

12. Document History

Effective Date	Version Number	Author(s)	Description
June 1, 2015	3	Jennifer Zerm Susan Sholtis	Replaces MJN-CP-019 (Interactions with Healthcare Professionals and Healthcare Entities). <ul style="list-style-type: none"> • Provide greater clarity on minimum compliance requirements for most common types of interactions with HCPs and HCEs; • Define a common set of terms for varying HCP/HCE interactions; • Require that records related to the policy requirements must be maintained in accordance with MJN Records Management Program; • Require that exceptions to this policy must be escalated to the General Manager and the Risk and Compliance Department for approval in writing.
May 22, 2013	2	Jill Reynolds	Added title and made minor change to wording on Page 6.
April 25, 2013	1	Jennifer Reczek	New Version