

medartis

PRECISION IN FIXATION

Social Media Policy

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1. Our Goal on Social Media «We and Social Media»

Medartis is present on various social media channels to increase brand awareness, promote our product offering, advertise events, promote launches, conduct employer branding campaigns and portray our public responsibility and values. Social media is an integral part of our Medartis communication mix and this should therefore be in harmony with our purpose statement and our five core values.

Certain rules apply to professional communication and work practices, which are set out in the employment contract, work regulations, business conduct guidelines, compliance and data protection regulations.

We welcome your comments, likes, feedback and shares on our company's social media pages and encourage you to share the content on your network if you feel it is appropriate. However, please always be aware that when you share content from your professional or business environment, you are not only acting as a private person but also positioning yourself as an indirect brand ambassador for Medartis. Therefore you are not only acting as an individual, but also indirectly representing the company. Especially in social media, the line between professional and private communication is fluid, which can reflect on you as a person as well as on your employer. The internet "never forgets", as the saying goes. In principle, all your activities on your individual social media account are a private matter, but in the following, we would like to give you a few best practice examples and show you a few pitfalls. This social media policy applies primarily to the use of social media in connection with your work.

2. Basic Principles «You and Social Media»

The basis of communication at Medartis is the company [ETHICS GUIDELINE](#) and we respect the policies of the social media providers. Business secrets, sensitive information, project details, disclosure of M&A projects, customers' and employees' information, as well as financial data should not be shared publicly or only shared with the express approval of Medartis. As a publicly traded entity on the Swiss stock exchange, Medartis is bound to strict disclosure requirements. These regulations are applicable to all employees of Medartis, regardless of their country of residence. Only after the information has been officially published or confirmed by the company may you comment on or share it.

Any comments must be respectful to us and our community, Medartis is a company that respects and promotes diversity and inclusion, comments that configure discrimination of any type, regarding gender, sexual orientation, religious convictions, ethnicity, age group, nationality, physical condition, among others, are not allowed. Do not give professional or medical advice on behalf of the Company, the credibility, source and veracity of the information provided in your social media, is in the sole responsibility of the publishing employee.

Please never post clinical cases from our products on social media channels and our internal communication platform m-Hub that show an off-label use, a recall or a failed surgery. Approved applications of medical implants and instrumentation vary from country to country. Rather than sharing product-specific information on public channels, send complaints or product/service issues to the relevant product specialist in your country. Interesting cases showcasing our products can be shared with the marketing team for evaluation or sent to socialmedia@medartis.com. Surgical cases can then be presented as a case report or simply promoted on our official social media channels.

3. Legal and Regulatory Issues

«Very important Don'ts in Social Media»

Please use your private and not your business e-mail address (joe.smith@medartis.com) for registration on a social media platform if it is also used privately.

As a company in a highly regulated industry, there are certain topics we are not allowed to talk about or share:

- a. Unsubstantiated claims about or discussion of «off-label» or unapproved/non-directed uses of our products.
- b. Medical advice or product usage information.
- c. Inappropriate comments or inferences about our competitors (for example, disparaging comments or any statements about their products).
- d. Information that is false, inaccurate, or misleading to our customers and/or business partners.

Due to its sensitive nature and local regulations, we recommend that you do not use or disclose the following information:

- e. Third-party intellectual property, such as any copyrighted material (art, music, videos, written text), or any trademarks or logos, except with the express consent of the owners of such intellectual property.
- f. Information plagiarized/copied from another source.
- g. Personal data that could allow anyone to identify the individual(s), such as an address, phone number, social security number, license plate number, home town, school, etc. unless those individuals have expressly consented to such use.
- h. Text, pictures or images that could be described as malicious, intimidating, obscene, profane, lewd, crude, vulgar, offensive, provocative or pornographic, or as containing gang signs or symbols, gun imagery, political or religious propaganda, derogatory characterizations of any ethnic, racial, sexual or religious group, depictions of alcohol or drug abuse, or promotion of illegal activity of any kind. As a general rule, comments that could be construed as defamation, slander or defamation of character should be avoided. Threats and insults are also inappropriate.
- i. Photos and/or videos, that can identify a patient, reveal patient data or any other personal data, including those depicting individuals, unless the photographer (and, where applicable, the depicted individual, and if the depicted individual is a minor, the minor's parent or legal guardian) or videographer have expressly consented to such use. The legal basis for the processing of photos, videos and contact details is the legal basis of legitimate interest, according to Article 6, paragraph 1 lit. f GDPR, as well as your active consent according to Article 6, paragraph 1 lit. a. You have the right to revoke your consent at any time, through the form on our website to attend data holders requests, at the link <https://www.medartis.com/en-us/compliance/> or via e-mail dataprotection@medartis.com.

4. Summary

- a. Please be aware that you are responsible for what you write, share, replicate and publish on social networks. Confidential matters, sensitive information or strategic information should not be published.
- b. Photos, videos, X-rays or CT images featuring cadaveric specimens should not be used, and if used, should exclude any attributes (name, tattoo, piercing, etc.) allowing identification of the patient. Exception: official teaching content.
- c. Always respect others opinion. Stay calm, anger is not a good motivation to post or reply something.
- d. Internal criticism is welcome but should remain internal for proper treatment.
- e. Your opinion must be recognizable as such and should not be posted on the internet as a statement of fact. Always name the sources and stick to the truth.
- f. Respect copyright and privacy. It is best to post about practices/issues/cases that have already been published externally or are generally known.
- g. For the publication of individual photographs or recordings of small groups, the consent of the people depicted is a prerequisite. Verbal consent is mandatory, and written consent is recommended.
- h. When publishing a photo, please also check if the background of the image does not contain documents or computer screens that could reveal confidential information or legally protected personal data.

Discussions that start out innocently enough can quickly escalate on social media. Private discussions can quickly become business-related. A post can be forwarded thousands of times within a few minutes and degenerate into a conflagration. These cases are rare, however, if they occur, please contact our social media experts immediately: socialmedia@medartis.com or call them in an urgent case.

If you have any doubts or concerns regarding communication on social media platforms, please contact socialmedia@medartis.com, corporate.communication@medartis.com, or our colleagues in Legal or Compliance. Offensive situations contrary to the guidelines of this policy, or to the company's general ethics rules can be reported through our [Compliance Whistleblower Channel](#) or at ethics@medartis.com.

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