

Ethical Interactions with Healthcare & Government Stakeholders

Our Commitment

Element Biosciences is committed to conducting its business with integrity, transparency, and respect for the highly regulated medical technology and healthcare environment in which we operate and continue to expand. We recognize that our interactions with healthcare professionals, healthcare organizations, and government officials play an important role in advancing scientific innovation and supporting the responsible use of our technologies.

As our portfolio evolves to include products subject to increased regulatory oversight in select markets, we are dedicated to ensuring that these interactions are ethical, appropriate, and compliant with applicable laws and regulations worldwide.

Element maintains a comprehensive framework of internal policies, procedures, systems, and training designed to guide personnel and support compliance with these standards. These controls are intended to ensure that interactions with healthcare and government stakeholders are conducted consistently, responsibly, and in accordance with applicable laws and regulations.

Guiding Principles

Our approach to engaging with healthcare and government stakeholders is grounded in the following core principles:

1. Legitimate Purpose

All interactions must serve a genuine scientific, educational, or business purpose. We do not provide any form of value to influence clinical judgment, purchasing decisions, or regulatory outcomes.

2. Integrity and Independence

We respect the independence of healthcare professionals, healthcare organizations, and government officials. Our interactions are designed to support informed decision-making, not to create undue influence or conflicts of interest.

3. Transparency

We are committed to transparency in our interactions. As our regulated product footprint expands, we track and disclose transfers of value where required by applicable laws and regulations.

4. Proportionality

Any compensation or support provided must be reasonable, appropriate, and consistent with the services performed or the purpose of the interaction.

5. Compliance with Law

We comply with applicable anti-corruption, anti-bribery, and transparency laws globally, including those that apply as we introduce regulated products in certain jurisdictions.

How We Engage with Healthcare & Government Stakeholders

Scientific and Educational Exchange

We collaborate with healthcare professionals and researchers to advance scientific understanding and support the safe and effective use of our technologies. This includes educational programs, training, and scientific exchange, particularly as we introduce regulated products in new markets.

Consulting and Advisory Services

We engage external experts to provide advice and insights that support our research, development, and business activities. These engagements:

- are based on documented, legitimate business needs;
- are governed by written agreements; and
- are compensated at fair market value.

Meetings and Events

We organize and participate in meetings and events that support education, training, and scientific exchange. These events are:

- held in appropriate professional settings;
- focused on substantive content; and
- free from entertainment or recreational activities.

Meals, Travel, and Accommodations

Where appropriate and permitted by law, we may provide modest meals or reimburse reasonable travel and accommodation expenses in connection with legitimate business activities. These are:

- limited in value;
- directly related to the purpose of the interaction; and
- never provided to influence decisions.

Gifts and Promotional Items

We maintain strict limitations on gifts and promotional items. In many jurisdictions, such items are not permitted. Where allowed, they must be of nominal value, appropriate, and compliant with applicable legal requirements.

Interactions with Government Officials

We apply heightened standards when interacting with government officials. In many jurisdictions, healthcare professionals employed by public institutions may be considered government officials. We strictly prohibit:

- offering or providing anything of value to improperly influence official actions; and
- engaging in any form of bribery or corruption.

Working with Third Parties

We expect third parties acting on our behalf, including distributors and vendors, to uphold the same standards of integrity and compliance. As Element expands into regulated markets, we maintain appropriate contractual and policy safeguards and oversight to ensure compliance with applicable laws.

Accountability and Oversight

Element maintains policies, procedures, and internal controls designed to support compliance with applicable laws and ethical standards. We provide training and resources to our personnel and encourage questions and reporting of concerns.

As our global footprint evolves, we are committed to continuously strengthening our compliance program to meet the expectations of the regulated healthcare and medical technology environment.

Contact

If you have questions about our approach to ethical interactions, please contact:
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