

Document Title	Verteo Corporate Rules for Text Monitoring Agent – United States
Company	Verteo Biopharma, Inc.
Department	Commercial Operations / Sales & Marketing
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Verteo Corporate Rules

- Verteo employees may not offer government employees, Healthcare Providers, Healthcare Organizations, Pharmacy Benefit Managers, or Payors gifts, rebates, bribes or kickbacks in exchange for prescribing Verteo products or placing Verteo products on formularies or preferred prescribing lists. This includes a prohibition on:
 - The provision of gift cards, cash, or cash equivalents to HCPs in any setting
 - Awarding grants, speaking positions, or contract employment outside of fair market value or established protocols.
- Verteo employees may not solicit bribes or remuneration in exchange for free samples or free corporate merchandise.
- Verteo employees may never comment on ongoing company litigation during a sales interaction. This includes but is not limited to:
 - The MARTIN v. VERTEO BIOPHARMA, INC. product liability/failure to warn case related to the withdrawn product Narbrax in the Northern District of California
 - UNITED STATES ex rel. RODRIGUEZ v. VERTEO BIOPHARMA, INC. qui tam case related to algorithmic exclusion of safety data on the Supreme Court docket.
- Verteo employees may not make statements or respond to questions regarding environmental sustainability programs in a sales, medical, or clinical context except to direct HCPs to view the Verteo Corporate Sustainability Position Statement.