ORAMETRIX, INC.

Marketing Code of Conduct

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Declaration of Compliance

This Marketing Code of Conduct is designed to comply with applicable federal and state laws, as well as industry standards relating to the marketing and promotion of products to healthcare professionals.

To the best of our knowledge, as of the date of this declaration, OraMetrix is in material compliance with this Marketing Code of Conduct, as described herein, and, as applicable, the California Health & Safety Code, Sections 119400-119402, and the Commonwealth of Massachusetts Regulations, 105 C.M.R. 970.00, et seq. To the extent that state or local regulations are more restrictive than is explicitly specified in this code, OraMetrix will comply with those state or local regulations.

Introduction

This Code of Conduct is intended to ensure that OraMetrix employees interact in an ethical manner with health care professionals and comply with applicable federal and state laws and industry standards.

Product Training and Education

OraMetrix may conduct training on the safe and effective use of its products and services and may provide education on the benefits of its technologies. These training and educational programs should be conducted in clinical or educational settings conducive to the exchange of information, including its internal training facility, a health care professional's premises, or conference or educational centers.

OraMetrix may provide modest meals and hospitality to attendees of training or educational meetings. An OraMetrix employee shall be present for the duration of these meetings. OraMetrix will not pay for or reimburse expenses for entertainment or recreational events in conjunction with training or educational meetings.

OraMetrix may reimburse attendees for necessary and reasonable travel and modest lodging expenses incurred by health care professionals to attend training or educational meetings. OraMetrix will not reimburse expenses for guests or spouses of attendees.

Third-Party Educational Conferences

OraMetrix may provide grants directly to conference sponsors to defray conference costs or directly to training institutions in support of training of health care professionals. OraMetrix will not reimburse attendees of third party educational conferences for travel and lodging expenses; except under limited situations, OraMetrix may provide grants to conference sponsors to cover the expenses of faculty for modest travel, lodging and meals.

OraMetrix may purchase advertisements or lease booth space for company displays at conferences.

Sales, Promotion, and Other Business Meetings

OraMetrix sales representatives and their direct managers may pay for modest meals in conjunction with informational, educational or product training meetings at a health care professional's premise, OraMetrix's facilities or other educational or conference settings conducive to the exchange of information. An OraMetrix employee shall be present for the duration of these meetings.

OraMetrix may pay for reasonable travel and lodging expenses and modest meals for health care professionals to visit OraMetrix facilities or to visit the premises of OraMetrix's customers.

OraMetrix will not reimburse expenses for guests or spouses of attendees.

Consulting Arrangements

OraMetrix may reimburse health care professionals providing bona-fide services to OraMetrix or on behalf of OraMetrix for reasonable and actual expenses, including travel, lodging and modest meals, incurred to attend meetings of the Clinical Advisory Board, the Speakers Board, the SureSmile Faculty Board, and for speaking at educational conferences or peer-to-peer training events. OraMetrix may provide health care professionals modest meals in conjunction with and subordinate to such meetings. Meetings will be held at venues conducive to the exchange of information. OraMetrix will not pay for recreational or entertainment activities for health care professionals.

Health care professionals providing consulting services are selected based on their qualifications relative to defined needs of the company. Any compensation paid will be at fair market rates.

Entertainment

OraMetrix does not pay for any entertainment or recreational event for health care professionals.

Promotional Material

OraMetrix prohibits gifts of non-educational promotional materials, such as pens, pads, coffee mugs, or gift cards, to health care professionals. OraMetrix may occasionally provide sample patient educational materials with fair market value less than $100. Included in the price of the SureSmile system are sample educational and non-educational promotional materials for patients.

Employee Training

All employees in contact with customers from the Marketing, Sales, Practice Development, Service and Customer Training department shall be trained on the general rules of OraMetrix, as well as, industry standards and the specific rules according to federal and state regulations, including the Code of Conduct (105 C.M.R.970.000) in MA. Electronic copies of those regulations are available.

The training is included in the employee orientation phase and documented in the introduction record (T2001). Additional training follows the instruction I-2021 Employee Training.

Continuous monitoring

OraMetrix has appointed a Marketing Code of Conduct Compliance Officer.

Breaches to our procedures can be reported by email to the compliance officer. In general, compliance with the code of conduct will be audited as part of the company's annual internal audit. If breaches are identified, corrective action will be taken based on the company's CAPA process (P2030).