



## COLLEGIUM COMMERCIAL CUSTOMER INTERACTIONS POLICY

### PURPOSE

- The purpose of this policy (the “Policy”) is to provide guidance to employees (“Employees”) and contractors (“Contractors”) who promote, market and /or otherwise develop materials, programs or other activities intended to promote Collegium Pharmaceutical (“Collegium”) products to external healthcare professionals (“HCPs”) and /or other customers (“Customers”).
- This Policy is owned and implemented by the Collegium’s Chief Compliance Officer (CCO), who is responsible for designing and implementing the Company’s compliance program, with oversight from the Compliance Committee of the Board of Directors.

### SCOPE

This Policy applies to all Employees and Contractors of Collegium that engage in any advertising or promotional activities for Collegium products, including those who are headquarters-based or field-based within the following departments (or sub-groups within departments):

- Sales
- Marketing
- Marketing Access & Trade
- Commercial Capabilities & Training
- Commercial Operations
- Corporate Strategy & Development

The Training department is responsible for ensuring that all members of the organization whose day-to-day business activities apply to this Policy are trained as new hires during onboarding and on an ongoing annual basis.

For field-based Commercial Employees, certain additional requirements are applicable as described within this Policy.

This Policy does not apply to members of Medical Affairs as they interact with HCPs. (See Medical Affairs Interactions Policy).

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### DEFINITIONS

**Contractor:** All individuals who provide services to Collegium subject to a contract. Typically, the contract is a temporary need for services for a limited period of time, a select service or a specific result or outcome. Contractors include agency temporary workers, independent contractors, consultants, vendors, contract workers, etc.

**Customer:** Any entity involved in the purchasing, prescribing or reviewing for the purchasing or prescribing of a Collegium product including, but not limited to, purchasing groups, hospitals, medical schools, nursing homes, pharmacies, risk and non-risk bearing payers (e.g., PBMs, HMOs, PPOs, ACOs, etc.), physician groups, integrated health systems, drug wholesalers and distributors, and federal and state government entities (e.g., CMS, VA, DoD, Federal Health Insurance Exchanges, etc.). Customer also includes any employees or staff of such entities involved in decisions related to purchasing, prescribing or review of Collegium products.

**Commercial Employee:** An Employee who has responsibility for product promotional activities and reports up through the CCO or similar role.

**Employee:** Individual hired directly by the Collegium and paid through Collegium’s payroll for an ongoing, indefinite period to perform work for Collegium on a weekly schedule.

**HCP:** All medical professionals including, but not limited to, physicians, medical students, nurses, nurse practitioners, physician assistants, pharmacists and other medical technicians. “HCP” also includes other employees or staff involved in purchasing or prescribing decisions including, but not limited to, formulary and P&T committee members.

**Customer Relationship Management System (CRM system):** The day-to-day input system and automation tool that Field-Sales Representatives and Medical Affairs Employees or Medical Science Liaisons (MSLs) (as applicable) utilize to record their interactions with HCPs.

### POLICY STATEMENTS

#### **General Requirements**

Collegium has core principles that pertain to interacting with HCPs and Customers in a promotional manner. All Commercial Employees and Contractors at Collegium are required to follow these principles during any interaction with an HCP or Customer.

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All promotion of Collegium products must be truthful, not misleading, contain a fair balance of important safety information (contraindications, side effects, drug interactions, etc.) and product benefits and be consistent with the products FDA- approved indications.

Off-label promotion is strictly prohibited.

All Advertising and Promotional Materials must be approved by the Material Review Committee ("MRC").

Commercial Employees and Contractors may not create their own Promotional Materials and/or utilize MRC-approved Promotional Materials that have been altered or changed in any way (e.g., written notes, sticky notes) not specifically approved by MRC.

The use of expired, lapsed or recalled materials is not permitted.

Under no circumstances may Commercial Employees and Contractors solicit requests for or answer an unsolicited request for off-label Information. In such circumstances, they must utilize the Medical Information Request Form ("MIRF") in the CRM system and submit the form electronically via email to <mailto:MIRF.Collegium@4CPharma.com>. In addition, the Collegium Drug Safety number may be used: 855-331-5615.

Commercial Employees and Contractors may never provide, promise, imply, suggest or offer any payment, educational item, service or any other item of value to an HCP or Customer in exchange for a referral, use, recommendation or favorable formulary or clinical treatment guideline position of a Collegium product including, but not limited to:

- Gift cards.
- Promise of engagement as a speaker or consultant.
- Pull patient charts potentially appropriate for a Collegium product.
- Complete paperwork for prior authorization or other reimbursement.
- Meals in exchange for a commitment to use or recommend a Collegium Product.

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Commercial Employees and Contractors may only call on HCPs who treat patients who are reasonably expected to use Collegium products for their FDA-approved indication.

Field-based Commercial Employees and Contractors must utilize the CRM system in order to properly document their interactions with HCPs in a timely manner (within 24-hours of the interaction). All information input must be truthful, accurate and timely.

Commercial Employees and Contractors may not use email, text, instant messaging or any other forms of electronic communication to distribute or discuss Collegium Promotional Materials unless the communication method and the Promotional Materials have been approved as such by MRC.

Commercial Employees and Contractors may not engage in any discussions with HCPs regarding the provision of grants (Continuing Medical Education (CME), non-CME, Investigator Initiated Studies (IIS)) or charitable contributions. All such requests must be directed to the Medical Affairs Department or to the Collegium Medical Affairs website.

During promotional interactions with HCPs or other Customers at medical conferences, Congresses or other professional meetings, Commercial Employees and Contractors must stay within the area designated for promotional activities and may not staff Medical Information booths unless otherwise authorized.

Sales representatives and their managers may not engage in meals or drinks with HCPs attending medical conferences or congresses.

Sales representatives assigned to staff disease state booths may not then switch over to a promotional booth at the same conference.

Commercial Employees and Contractors may not promise, imply or suggest that they will provide funding for grants, charitable contributions or other forms of funding to or on behalf of an HCP or Customer. All such requests must direct the HCP or Customer to utilize the appropriate Collegium identified process for submission of the funding request; when in doubt, the employees should contact Collegium's Compliance department.

Consistent with the Collegium Code of Ethics, Commercial Employees and Contractors are to avoid even the appearance of a conflict of interest with HCPs and Customers. To the extent that a potential conflict of interest is identified, it should be discussed with General Counsel ("GC") and or CCO before proceeding further with a discussion/activity.

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During interactions with HCPs or Customers, to the extent Commercial Employees or Contractors learn of an Adverse Event, they must report it within 24 hours as described in the Adverse Drug Experience and Product Complaint Policy.

### Compliance

Any Employee or Contractor who becomes aware of an actual or potential violation of this or any other Collegium Policy must promptly report it to his or her manager and/or one of the following:

- Call the Collegium Ethics Hotline at: 844-764-2360 or report via online portal at [compliance.collegiumpharma.ethicspoint.com](https://compliance.collegiumpharma.ethicspoint.com);
- Email [Compliance@Collegiumpharma.com](mailto:Compliance@Collegiumpharma.com); or
- Email Human Resources at: [hr@collegiumpharma.com](mailto:hr@collegiumpharma.com).

Collegium follows a strict policy of non-retaliation, and no Employee or Contractor is ever subject to retaliatory action for the good faith reporting of any suspected violation of Collegium policy or improper behavior.

Failure to follow this policy may subject an Employee or Contractor to disciplinary action, up to and including termination.

### Training Requirements

All Commercial Employees and Contractors engaged in developing, conducting or monitoring promotional activities/interactions must review and acknowledge their understanding and commitment to comply with this policy. In addition, all Commercial Employees, their management and Contractors who are identified as having roles in which they interact with HCPs and Customers must complete training on this Policy.

### Monitoring of Commercial Interaction with HCPs

Consistent with the Office of the Inspector General (“OIG”) of Health and Human Services (“HHS”) Guidance to Pharmaceutical Manufacturers, Collegium has established a Compliance Monitoring Program. This program is designed to ensure compliance with Federal healthcare laws, FDA, promotional regulations, Collegium policies and the Code of Ethics. As part of the monitoring program, for example, Regional Sales Managers (“RSMs”) are expected to monitor their representatives compliance with the requirements described in this Policy through routine field-rides and completion of a Field Coaching Report in the CRM system. In addition, Compliance

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performs independent monitoring of Commercial Employees and Contractors through live, field-based monitoring and review of selected data associated with HCP and Customer interactions.

### **COMMERCIAL CUSTOMER INTERACTIONS WITH HCPS AND CUSTOMERS — KEY REQUIREMENTS**

Promotional interactions with HCPs and Customers must always focus on providing truthful, accurate, not misleading and on-label information about Collegium products with a fair balance of safety and efficacy. Therefore, all Commercial Employees and Contractors must abide by the following requirements when interacting with HCPs and Customers in promotional discussions.

#### **Promotion of Collegium Products**

All discussions of Collegium products must stay within the FDA-approved indications and relate only to FDA-approved products. Under no circumstances may a Collegium Commercial Employee or Contract worker have discussions related to unapproved indications or uses for any products or discuss any products or compounds that have not yet been approved by the FDA.

Off-label promotion includes the discussion of an indication, data or use not approved by the FDA or included in the PI such as the use of a product:

- In a different disease state;
- In different patient populations;
- With different dosing regimens or strengths; and/or
- In a different phase in treatment (e.g., first-line therapy) than are provided in the product's approved FDA label.

Promotion of Collegium products to an HCP or Customer who specializes in an area that is not consistent with the FDA-approved label of the product may also be considered off-label promotion. As such, Commercial Employees and Contractors may not promote Collegium products to HCPs or Customers who would not be reasonably expected to use the products consistent with the FDA-approved label. Collegium currently utilizes HCP specialty codes and other criteria during its call plan development process to identify HCPs who must be excluded from promotion of a product. Specialty exclusion lists and the call plan

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development process are covered in the Call Plans/Target Lists and Incentive Compensation section below.

FDA regulations require that the product promotion must be truthful, accurate, not misleading, and contain a fair balance of important safety information and efficacy. A fair balanced presentation includes a discussion of the product's benefits as well as the relevant safety risks (e.g., side effects, contraindications, warnings, etc.).

A package insert ("PI"), and important safety information ("ISI") for products with black box warnings, must be provided during or at the conclusion of all promotional activities.

### Providing Written Materials

Commercial Employees and Contractors must utilize only Promotional Materials that have been previously approved by MRC. Promotional Materials may only be used for the purposes and, as applicable, the time period specified by MRC.

Under no circumstances may Commercial Employees or Contractors create their own Promotional Materials and/or utilize Promotional Materials that have been altered or changed in any way unless previously approved by MRC.

Commercial Employees and Contractors may distribute scientific and medical publications consistent with the requirements determined by the MRC.

### Unsolicited Requests for Information

In the event that an HCP or Customer has an unsolicited question regarding an off- label use of a Collegium product, neither the Commercial Employee nor the Contractor is permitted to answer the question. Commercial Employees and Contractors must submit the question utilizing the Medical Information Request Form (MIRF) in the CRM system and submitting it electronically or via email or fax using the paper MIRF as required. They may also request that the Medical Affairs department contact the HCP.

The request form must be signed and dated by the requesting HCP or Customer to confirm that their question is accurately stated.

Healthcare decision makers ("HCDMs") at institutions/organizations often have the need for product/compound information when planning/reviewing their formulary. In such cases and when

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there has been an unsolicited request for information on a Collegium product/compound, a product dossier may be provided.

In the rare event that an HCP's signature cannot be obtained (for example, the HCP is unavailable to sign prior to leaving the office), the Commercial Employee or Contractor must instruct the HCP to contact Collegium's Medical Affairs department directly with his/her question at (781) 713-3699.

### **No Quid Pro Quo — Restriction on Offers of Payment or Transfers of Value**

Commercial Employees and Contractors may never offer, imply, suggest or appear, through their actions, to offer payment or any transfer of value to an HCP in exchange for use, prescribing, recommending or favorable formulary or clinical guideline placement of a Collegium product.

In certain circumstances, and where not prohibited or restricted by state or Federal law, it may be appropriate to provide a modest meal or refreshment accompanied by an in-office promotional discussion or to provide an occasional educational item to an HCP. Commercial Employees and Contractors are to refer to the Meals, Gifts, and Entertainment Involving HCPs and Customers for additional guidance.

### **Use of Email, Text or Other Forms of Electronic Communication**

Personal devices should have limited, non-substantive use for Collegium business as described below.

- Any communications and data on personal devices that relates in any way to Collegium business is subject to collection in government investigations and other legal actions and may be covered by legal holds. Collegium may request access to personal devices that contain electronic communications by its Employees and Contractors related to Collegium business activities, and the Company reserves the right to take disciplinary action if an Employee fails to comply with such a request.
- Text message may be used in rare, limited circumstances by Collegium Employees or Contractors to confirm logistical details with an HCP or Customer, such as confirming a meeting or securing a sales call appointment (date, time or location). Employees are strongly encouraged to communicate with HCPs or Customers in-person or by calling the office to confirm those details.

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- Under no circumstances should a Collegium Employee use text messaging for substantive communication (for example, discussing Collegium’s product portfolio or sensitive business objectives).
- Under no circumstances may a Collegium Employee or Contractor communicate electronically with an HCP or Customer through an unapproved messaging platform (such as WhatsApp, SnapChat, GroupMe, WeChat, Telegram, Signal, etc.), or through a personal, non-Collegium e-mail address.

**SALES AND MARKETING INTERACTIONS WITH HCPS AND CUSTOMERS — OTHER REQUIREMENTS**

**Interactions at Professional & Patient Organization Events (conferences/conventions/congresses)**

Commercial Employees and Contractors interacting with HCPs and Customers during events sponsored by third-party professional and patient advocacy organizations must abide by the requirements outlined in section 6 of this Policy related to product messaging, MRC approved materials, responding to unsolicited requests for medical information and adverse events.

Commercial Employees and Contractors staffing a Collegium promotional booth at a medical professional event may only staff a product promotional or disease state booth whose purpose is to provide information on Collegium products or disease states of interest to Collegium to the HCPs attending the event. All materials utilized at the booth must be MRC approved in advance for such use.

Commercial Employees and Contractors staffing a Collegium booth at a patient advocacy event may only staff a booth whose purpose is to provide information on Collegium programs designed for patients attending the event. All materials utilized at the booth must be MRC approved in advance for such use. Direct-to-consumer product promotion is not permitted.

Commercial Employees and Contractors operating a promotional booth must be aware of the relevant state laws and certain restrictions on the acceptance of refreshments or other items of value by HCPs and may not provide any items prohibited by state law and work with Compliance to ensure that any permissible exchange of value to an HCP or Customer is documented appropriately for Sunshine Act reporting purposes.

In addition to a promotional booth, Collegium may sponsor a medical information or disease state

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booth at a medical conference, convention or congress. A clear differentiation between promotional and medical or disease state booths (or such sections in a single booth must be maintained by placing a physical barrier between the two sections of the booth) and Commercial Employees may not be present in these medical or disease state sections of the booth.

Commercial Employees may only staff or otherwise engage in activities at a promotional product booth (or the promotional section of a combined booth) or, when approved by MRC a disease state booth (but not both at the same conference or congress). Commercial Employees are not permitted to staff or otherwise engage in any activities at a medical information booth.

### Disclosure of a Conflict of Interest

Consistent with the requirements set forth in the Collegium Code of Ethics, Commercial Employees and Contractors are to avoid any situation where personal interests (or those of relatives, friends or associates) might conflict, or even appear to conflict, with the best interests of Collegium. If you become aware of a potential conflict of interest, or if you are unsure that a conflict of interest exists, you must contact the General Counsel or the Chief Compliance Officer to make a determination.

### Adverse Events

All Commercial Employees and Contractors are obligated to report any instances of Adverse Events consistent with requirements outlined in the Adverse Drug Experience and Complaint Policy within 24 hours of becoming aware of the event by calling Collegium Drug Safety at 855-331-5615 or by email to <mailto:MICC.Collegium@4CPharma.com> and providing the following information:

1. Your name and contact information.
2. Name of individual reporting AE and contact information.
3. Initials and gender of the individual experiencing the AE.
4. Collegium product they are on and dosing regimen.
5. Nature and severity of the AE they are experiencing.

### Interactions with Patients

Commercial Employees and Contractors may not promote (or discuss) Collegium products to patients or the lay public.

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### Call Plans/Target Lists and Incentive Compensation

Field-based Commercial Employees and Contractors may only call on HCPs who are reasonably expected to prescribe Collegium products for an FDA- approved use.

Collegium uses specialty designations as well as other potential criteria in its call plan process to identify the appropriate HCP targets for promotion by Field-based Employees.

Collegium does not use Incentive Compensation (“IC”) to encourage or reward anyone to undertake actions that are inconsistent with Collegium policies or Code of Ethics including off-label promotion. Collegium uses the same specialty designations and other criteria used during the Incentive Compensation Plan process utilized in the Call Plan process in order to include only data associated with HCPs who have the approved specialty and are reasonably expected to prescribe Collegium products for the approved indication.

### Documenting HCP Interactions in the Customer Relationship Management System (CRM)

Field-based Commercial Employees and Contractors must utilize Collegium’s CRM system to accurately and completely document their interactions with HCPs and/or Customers.

All required information related to the HCP and/or Customer interactions must be accurately documented in a timely manner within the CRM system – not later than 24 hours after the interaction.

Any additional documentation related to Collegium Field-based business or HCPs and/or Customers not captured in the CRM system may only be documented in One Note on the Collegium provided iPad. No other source for documenting interactions with HCPs and/or Customers is acceptable.

## **COMMERCIAL INTERACTIONS INVOLVING MEDICAL AFFAIRS PERSONNEL**

### Field Sales Interactions with Medical Affairs Personnel

Field-based Employees and Contractors are not permitted to accompany a member of the Collegium Medical Affairs Department on a visit to an HCP if they are responding to an off-label question, except for the express purpose of introducing the Medical Affairs personnel to the HCP or Customer. (Specific guidance regarding interactions with Market Access & Trade Customers is described in the next section below).

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Any unsolicited requests from an HCP or Customer regarding an off-label use must be properly documented and forwarded to the Medical Affairs Department utilizing the MIRF process described above. Commercial Employees and Contractors may contact members of the Medical Affairs Department for the purpose of informing them of a MIRF submission where the HCP has requested that a Member of the Medical Affairs Department respond to unsolicited requests for information.

### Interactions Involving Medical Affairs, Collegium Directors of National Accounts and Managed Markets Customers

Medical Affairs Department Employees may participate in meetings with Directors of National Accounts and HCPs or Customers who are employees of health maintenance organizations, pharmacy benefit managers, group purchasing organizations, etc. (collectively, "Market Access & Trade Customers").

During such meetings, Directors of National Accounts may coordinate with Medical Affairs Employees to provide MRC-approved scientific information upon request of the Market Access & Trade Customer. During such interactions, the specific responsibilities for the Director of National Accounts and the Medical Affairs Employee associated with these meetings include:

- The Director of National Accounts is responsible for the MRC-approved on-label product presentations and other commercial and contracting discussions.
- The Medical Affairs Employee is responsible for the on-label scientific presentations including MRC- approved economic, clinical, health outcome, healthcare quality, population health improvement and disease state information.

Directors of National Accounts may only observe during the portion of the meeting where the Medical Affairs Employee is presenting or discussing the scientific, health economic and clinical information. Additionally, Medical Affairs Employees may not engage with Market Access & Trade Customers in a commercial or contracting discussion.

In the event an unsolicited off-label question is asked during a Medical Affairs Employee presentation to a Market Access & Trade Customer, the Medical Affairs Employee may respond to the narrow, off-label question asked consistent with the Medical Customer Interactions Policy, including all required documentation. Directors of National Accounts may not respond to such questions or engage in any additional discussion during the response by members of Medical Affairs.

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### Interactions Involving Medical Affairs, Marketing and HCPs or Customers

Medical Affairs Department Employees and Marketing Employees may participate in meetings with HCPs or Customers (e.g., Key Opinion Leaders (KOLs), employees of health maintenance organizations, pharmacy benefit manager, group purchasing organizations, customer formularies, etc.)

During such meetings, Marketing may coordinate with Medical Affairs Employees to provide MRC-approved scientific information upon request of the HCPs, Customers or Marketing. During such interactions, the specific responsibilities for Marketing and the Medical Affairs Employee associated with these meetings include:

- Marketing is responsible for the MRC-approved on-label product presentations and other commercial and contracting discussions.
- The Medical Affairs Employee is responsible for the on-label scientific presentations including MRC- approved economic, clinical, health outcome, healthcare quality, population health improvement and disease state information.

In the event an unsolicited off-label question is asked during a Medical Affairs Employee presentation, the Medical Affairs Employee may respond to the narrow off-label question consistent with the Medical Affairs Interactions Policy, including all required documentation. Marketing may not respond to such questions or engage in any additional discussion during the response by members of Medical Affairs.

### **COMMERCIAL INTERACTIONS WITH CUSTOMERS – SPECIFIC REQUIREMENTS FOR GOVERNMENT CUSTOMERS**

Collegium Employees and/or Contractors, including Directors of National Accounts, who are responsible for conducting interactions described in this Policy with HCPs and Customers who are employed by federal, state, or local government (or associated agencies) or are elected or appointed public officials (collectively, “Government Employees”) must comply with the applicable requirements imposed by this policy. In addition, all Employees and/or Contractors should refer to the Policy on Meals, Gifts and Educational Items of Value Involving HCPs and Customers.

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**Please be aware that interactions that are permissible when conducted with HCPs or Customers who do not work for the government may be prohibited when these same activities are conducted with Government Employees. In addition, if a Collegium Employee or Contractor is unsure whether more stringent policies apply to a Government Employee, he or she should contact Compliance.**

### **Office of Government Ethics / Interactions with Federal Government**

Interactions with federal employees are governed by Government Ethics rules, including the Standards of Ethical Conduct established by the Office of Government Ethics (“Standards of Ethical Conduct – Subpart – B”). See U.S. Office of Government Ethics (<http://www.oge.gov>). The Government Ethics rules outline the specific restrictions that federal employees must comply with when interacting with manufacturers. In addition, in certain instances, Collegium may adopt more restrictive policies regarding its interactions with federal employees. The general guidance regarding interactions with federal employees is as follows:

- **Speaker Engagements:** HCPs employed by the federal government are generally prohibited from accepting compensation for speaking engagements that relate to the employee’s official duties. This includes receiving compensation to speak to other HCP Government Employees on behalf of Collegium. Employees or Contractors may never extend an invitation to speak to an HCP employed by the federal government primarily because of the HCP’s official position rather than his or her expertise in the subject matter being presented. Only professional speakers approved by Collegium’s Compliance Department may be used.
- **Meals and/or other “Gifts”:** The provision of any “gift” to any federal employee is prohibited. As such, Employees and Contractors may not provide meals, snacks, educational items of value, “gifts”, or other transfers of value, etc., to any federal employee.
- **Additional Government Facility or Agency Rules:** Employees or Contractors are required to read, understand and comply with applicable rules for the government facility or agency with which they plan to interact, which may be more restrictive than those described in this Policy. Failure to comply with such additional requirements, if any, may result in restrictions or limitations on the visiting privileges of an Employee or Contractor and/or result in loss of formulary access for Collegium products.

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### Interactions with the Department of Veterans Affairs (“VA”) and the Department of Defense (“DoD”)

Interactions with VA and DOD employees are also governed by the Local Facility Rules of each institution and/or applicable governmental agency rules with which they interact. In the case of the VA, activities are further restricted by the rules contained in the Drug and Drug- related Supply Promotion by Pharmaceutical Company Representatives at VA Facilities (38 CFR Part 1), as well as the VHA handbook Sections 1004.07 (Financial Relationships Between VHA Health Care Professionals and Industry) and 1108.10 (Promotion of Drugs and Drug-Related Supplies by Pharmaceutical Company Representatives).

**Among other things, the VHA Handbook makes clear that food items, of any type or any value, are not to be brought into VA facilities for provision to VA staff or non-VA staff.**

### State Law Restrictions

In addition to federal requirements, certain states restrict the amount of compensation that Collegium may provide to state (and in certain instances, local) government employees.

Although most states have some type of restriction, certain states have significant restrictions including prohibitions on performing certain services or have a cap on the amount of meals or other items of value that Collegium may provide to any state employee. All Employees and Contractors who interact with state employees are required to comply with all state and local laws and requirements. When in doubt, employees should contact Collegium’s Compliance department for guidance.

### ROLES AND RESPONSIBILITIES

The Sales Department is responsible for the activities and information disseminated by its sales representatives and management, as well as any Commercial Employees and Contractors as outlined above.

Market Access and Trade is responsible for the activities and information disseminated by its Directors of National Accounts and their management as well as any Commercial Employees and Contractors as outlined above.

The Marketing Department is responsible for the development of Promotional Materials approved

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by MRC and utilized by Commercial Employees and Contractors.

Compliance and Commercial Capabilities & Training are responsible for the development and administration of all training materials in order to meet training requirements.

### REFERENCES

- Collegium Code of Ethics
- Meals, Gifts and Educational Items of Value Involving HCPs and Customers
- Medical Affairs Interactions Policy
- Call Plan Development and Execution Policy
- Use of Advertising and Promotional Materials Policy

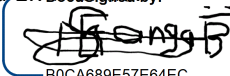
### HISTORY

Version 4.0: February 2023

### DEPARTMENT RESPONSIBILITIES:

OWNING DEPARTMENT:

**Department: Compliance**

- Name: Sanga Emmanuel
- Signature:   
BOCA689E57E64EC...
- Title: Chief Compliance Officer
- Date: 2/17/2023

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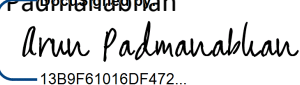




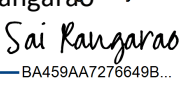
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### APPROVING AND STAKEHOLDER DEPARTMENTS:

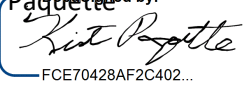
#### Department: Sales and Training

- Name: Arun Padmanabhan
- Signature:   
13B9F61016DF472...
- Title: VP, Sales & Training
- Date: 2/17/2023

#### Department: Marketing

- Name: Sai Rangarao
- Signature:   
BA459AA7276649B...
- Title: VP, Marketing
- Date: 2/17/2023

#### Department: Market Access and Trade

- Name: Kristi Paquette
- Signature:   
FCE70428AF2C402...
- Title: VP, Market Access & Trade
- Date: 2/18/2023

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