



# External Travel and Expenses Policy (Healthcare stakeholders)

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## SCOPE

This global External Travel and Expenses Policy (this “**Policy**”) applies in **all** interactions with external healthcare stakeholders (e.g., healthcare professionals, patient organization representatives, patients and their caregivers), where any travel, expenses, or other hospitality is reimbursed or otherwise provided by Camurus, to an external healthcare stakeholder.

The scope of the policy includes, but is not limited to, those situations where a healthcare stakeholder provides a consultancy service to Camurus, or receives sponsorship support from Camurus to attend professional, promotional, scientific, educational events, congresses, conferences and similar events, including but not limited to advisory boards, investigator meetings and visits to research or manufacturing facilities, or where Camurus staff meets with a healthcare stakeholder during the course of interactions in the field, or in connection to congresses and other events.

## OVERVIEW

Camurus works in collaboration with various healthcare stakeholders to drive innovation, exchange knowledge and information in medicine, and improve health and quality of life for patients. While such collaborations essentially contribute to enhanced patient care, at the same time, we recognize that interactions between pharmaceutical companies and healthcare stakeholders are particularly sensitive to conflicts of interest that may be detrimental. The provision of hospitality, including meals, travel and accommodation, to recipients in the healthcare and public sectors is strictly regulated. Depending on the nature of such contributions and the jurisdiction involved, it may also be improper from an anti-corruption perspective.

The aim of the Policy is to ensure that any travel, expenses, or other hospitality, that is re-imbursed or otherwise provided to a healthcare stakeholder, are made in full compliance with all applicable laws, regulations, and industry codes, and is cost-efficient, safe and environmentally friendly.

In addition to this Policy, additional provisions and requirements may apply, that may be adapted as imposed from time to time, as set forth in the relevant agreement between Camurus and the healthcare stakeholder, and/or as communicated by other means through Camurus (for example in connection to the invitation or registration for an event).

This Policy supplements and shall be applied in conjunction to the more general provisions concerning hospitality, which is stipulated in the Camurus global Healthcare Interaction Policy [1].

Please also note that, in case of conflict between Camurus global versus applicable local provisions, the strictest provision shall prevail. In addition, certain countries have laws, regulations and codes obligating Camurus and/or healthcare stakeholders practicing in those areas to abide by different travel, expense or hospitality guidelines. Where stricter than this Policy, those laws, regulations, and codes must be followed.

## POLICY

### **Hospitality – general provisions**

Hospitality extended in connection with interactions and events must be limited to travel, meals, accommodation, and genuine registration fees. These must comply with any local applicable

thresholds and industry code requirements that may prohibit, for example, meals above a certain cost limit or sponsorship to attend a congress.

Hospitality and attendance must only be extended to persons who qualify as participants in their own right, i.e., no spouse, partner, family member or other guest shall accompany the healthcare stakeholder. Unless in exceptional cases of established health needs (e.g., disability or injury), and subject to Camurus' approval, hospitality may be provided to another person.

All forms of hospitality offered must be reasonable in level and strictly limited to the main purpose of the event, or other professional interaction.

Hospitality must not include sponsoring or organizing entertainment (e.g., sporting or leisure).

## Travel bookings

Travel bookings shall, as a rule, be made by Camurus staff (or by assigned third parties if instructed by Camurus), and through a Camurus approved travel agency.

Where possible, costs shall be paid by Camurus directly to the service provider (e.g., travel agency, restaurant etc.), with no direct travel and expense reimbursement to the healthcare stakeholder. However, reimbursement for costs paid by the healthcare stakeholder directly are generally permitted for short journeys with taxi, public transportation, parking etc. These must be supported by appropriate documentation (receipts etc.), be justified, and reflected in the relevant contractual arrangement.

The permitted routing is: work/home → Camurus engagement/event → work/home.

The length of the journey should be tailored to the time required for the professional engagement/event, not to represent any additional benefit for the healthcare stakeholder. Extension of travel bookings for non-business reasons (e.g., arriving earlier or delaying departure, or stop-overs), beyond what is justified in relation to the attendance in a professional event or service performed, is not acceptable. As a general rule, in case overnight stay is required at the location of the event (e.g., the event starts in the morning or ends in the evening) arrival in or departure from the event destination shall be limited to up to 12 hours before and after the event, respectively, except for time required to participate in assigned preparatory work (e.g., a speaker briefing, as scheduled by Camurus prior to the actual performance of the event), and by taking into account the availability of flight/train connections etc. at the destination.

Camurus does not facilitate modifications of bookings for personal reasons (e.g. change of seat, upgrade, or flight time), and Camurus will not pay for any costs or fees associated thereby.

## Flights

For healthcare stakeholders providing consultancy services to Camurus (speakers, advisory board participation etc.), flight bookings may as an exception be made in business class, if justified by length of travel and travel schedule. This is subject to exception approval (see section "Policy Compliance" further below).

## Rail

Travel should be booked as fixed-date tickets, where possible. For healthcare stakeholders providing consultancy services to Camurus (speakers advisory board participation etc.), first class train tickets are permitted.

## Ground transportation

Taxi, bus, train tickets, parking tickets can be purchased and re-imbursed subject to valid receipt and as reflected in the relevant agreement. Non-justified expenses will not be reimbursed. Camurus does not reimburse for the use of a rental vehicle.

## Personal Car

Private car for travel to the event (conference venue etc.) is only acceptable if this is more justifiable than other public transportation alternatives, and for shorter travel distances (in general up to 320 km/200 miles), and provided such arrangement is agreed in advance with Camurus in writing. Healthcare stakeholders will be reimbursed for personal car mileage used during business travel at legal mileage reimbursement rate (as per rates defined per country). Personal mileage reimbursement is intended to cover all costs related to operation of the vehicle including service, maintenance (gas, oil), insurance and depreciation. The cost of parking and tolls will also be reimbursed, with proper receipts.

## Hotel accommodation

Accommodation is permitted if justified by the timings of the event and the distance required to travel to it. Accommodation can only be covered for nights in relation to the event, in single rooms, and at Camurus selected hotels. The standard of the hotel should embrace normal business standard regarding quality, safety and comfort (in general corresponding to 3-or 4-star classification), and shall not be renowned for spas, entertainment, leisure, sport facilities, be a resort, luxury, extravagant or 5-star accommodation. Additional charges for upgraded rooms to executive floors, concierge levels or suites will not be reimbursed. In-room charges for mini-bar, movies/games, personal items (e.g. toiletries, magazines, aspirin and other medicines, etc.) and health club/fitness center access fee charges will not be reimbursed. Room service is permitted subject to the conditions below.

## Meals and beverages

Only reasonable and modest expenses can be reimbursed, up to the cost level agreed in advance with Camurus in writing, and subject to the applicable Camurus policy or other provisions. Within Europe and Australia, Camurus apply the threshold limits issued by the European Federation of Pharmaceutical Industries and Associations (EFPIA) and Medicines Australia, respectively, as the maximum permitted cost [2],[3]. In the United States, Camurus policy applies in conjunction to the provisions in the Pharmaceutical Research and Manufacturers Association (PhRMA) Code on Interactions with Healthcare Professionals [4, 5]. In the UK, Camurus provisions for meals and beverages, as outlined in local SOP [6], also applies.

For meals and beverages ingested abroad, the threshold limit set for the country where the meal is consumed applies as the maximum permitted cost, often referred to as the “EFPIA host country principle” [2].

The limits include the total amount for food and beverages, and, unless otherwise stated (as is the case for instance in Australia [3] and the United States [4]), the total amounts include VAT/tax and gratitude/tips.

Alcohol is restricted to moderate amounts only and must only be provided in connection with dinner, or as part of meal refreshments at an evening reception. Stand-alone alcohol, i.e., when alcohol is served without food (e.g., after-dinner drinks, and bar visits), is not allowed.

Non-alcoholic alternatives shall always be offered.

## **Reimbursement for authorized travel-related expenses**

Reimbursement for authorized travel-related expenses incurred by the healthcare stakeholder will be made in accordance with the Policy, and as reflected in the relevant agreement, for reasonable, pre-authorized, out-of-pocket expenses, required for performance of consultancy services, or where applicable, to attend as a sponsored participant in legitimate scientific, educational or promotional events. To be eligible for reimbursement, proof of valid receipts shall be provided to Camurus no later than 30 days after the expense.

The healthcare stakeholder must not be reimbursed for extended or non-business-related stays prior to or after an event/meeting. In addition, Camurus will not reimburse travel, meals or additional lodging costs for spouses or other guests, unless as referenced above, in the exceptional circumstances of established health needs of the healthcare stakeholder.

## **POLICY COMPLIANCE**

This policy applies to all employees of Camurus, in customer facing functions and departments. Any exception to the Policy is subject to approval by Camurus CEO or the Global Head of Compliance/Compliance Officer.

For Camurus employees, violations of this policy may lead to disciplinary actions up to, including termination of employment. It is the responsibility of all Camurus employees to immediately report any suspicion of violation of this policy. Such concerns can be reported through ordinary Line manager reporting, HR, Camurus management, or to a representative of Camurus Legal or Compliance functions.

Reports can also be made through Camurus' whistleblowing system, which facilitate anonymous reporting and follow-up. The whistleblowing system is available via Camurus intranet and the corporate website.

Camurus will not tolerate retaliation against anyone for reporting concerns in good faith.

## REFERENCES

1. Camurus Healthcare Interaction Policy <https://www.camurus.com/sustainability/governing-documents/> (GUI-0028)
2. EFPIA Code of Practice <https://www.efpia.eu/relationships-code/the-efpia-code/>
3. Medicines Australia, Hospitality Guidance <https://www.medicinesaustralia.com.au/code/about-the-code/code-resource-toolkit/guidance/>
4. US Meals, Gifts & Entertainment (Camurus Policy GUI-0031)
5. The Pharmaceutical Research and Manufacturers of America (PhRMA), Code on Interactions with Healthcare Professionals <https://www.phrma.org/stem/code-on-interactions-with-health-care-professionals>
6. SOP-0125 Camurus Ltd Meetings & Hospitality