



# **Cook Medical Global Code of Conduct**

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*Nothing in this Code prevents or restricts the company from taking disciplinary action on matters relating to employee conduct, whether or not that disciplinary action is discussed in this document. Violation of these principles is discussed in each company's Employee Manual or Handbook. If required, disciplinary actions may include termination from employment. If any part of this Code of Conduct becomes unenforceable under the law of a particular jurisdiction, that section may be revised or deleted without affecting the remaining sections.*

## Message from the President

For nearly half a century throughout the world, the name “Cook” has been associated with innovation, vision, quality, success and integrity. We achieved this extraordinary reputation for excellence in our business dealings and relationships because of a very simple fact – we keep our promises.

We all make promises every day – to ourselves, to our co-workers, to our customers and their patients, to our employees and to our families and communities. These promises drive our business. In the changing regulatory landscape of business in the medical device industry, these promises serve us well.

What allows us to keep our promises is a commitment to honesty and ethical behavior. This commitment is made by each of us as individuals and by our company as a whole. As we state in our employee manuals and handbooks, Cook is committed to compliance.

Honesty and ethical behavior have always played an important role in Cook’s work. Our operations involve important legal and ethical responsibilities that extend to customers, to our fellow workers and employees, to the healthcare providers and public and private agencies with whom we do business, and to the public at large. It has always been Cook’s policy that its directors, officers, employees, representatives and agents behave ethically and follow the laws, regulations, policies and procedures that affect their jobs.

This Code of Conduct is designed to provide important guidance in good business practices for all our companies worldwide. It is essential that you take time to read and understand it. Every Cook employee, director, officer, consultant, distributor and agent is responsible for observing this Code of Conduct and the separate Cook “Policies & Guidance” and procedures that support it. Any questions should be directed to your immediate supervisor, the Corporate Compliance Officer of an individual Cook company, the Human Resources Department or the Chief Compliance Officer of Cook Group Incorporated. Additional resources are provided for you in this document.

By dedicating ourselves to the principles outlined in our Code of Conduct and by always doing the right thing, we will be able to maintain our reputation as a world-class leader in innovation, quality, integrity and reliability in everything we do. It all starts with you. Each of us as individuals, committed to personal integrity, will build a promising future for us all.

Kem Hawkins, President  
Cook Group Incorporated

## Cook Mission Statement

Cook is dedicated to bold leadership in pioneering innovative medical solutions to enhance patient care worldwide.

## Values

- **Patients** - Maintain a deep concern for patient safety and well-being.
- **Quality** - Provide the highest quality medical products.
- **Customers** - Treat customers with respect and serve them to the best of our ability.
- **Knowledge** - Solve diverse medical problems while maintaining a willingness to listen, learn, innovate and educate.
- **Integrity** - Respect our company by giving our best effort, loyalty, honesty and accountability.
- **Employee Involvement** - Acknowledge the contribution of our fellow employees.
- **Corporate Citizenship** - Serve as a corporate role model for the betterment of society by being a sensitive employer and contributor to the communities where we reside, and an example of the highest integrity in business dealings.
- **Environment** - Minimize our corporate impact on the environment and act intentionally to preserve and improve our surroundings for future generations.

## How do you “Do the Right Thing”?

The phrase “do the right thing” can mean different things. At Cook, “do the right thing” means:

- Patient safety always comes first!
- Follow the policies and procedures that apply to your job.
- Avoid even the appearance of impropriety.
- Don’t buy business.
- Practice transparency.
- Respect our customers and follow their policies.
- Admit mistakes and take the steps necessary to correct them.
- Cooperate with internal and external audits and investigations.
- Be a leader. Recognize and act on teaching moments.
- Keep your promises to our customers, to Cook, to our community and to each other.

## What is your role?

## I. Your role in:

### Owning the Global Ethics and Compliance Program

The written Cook programs must be considered first, unless a customer's policy or local law or regulation is stricter.

#### 1) Read, Understand and Take Ownership of this Code of Conduct

Cook expects its employees and agents to do what is right, treat people fairly, perform their jobs with diligence and honesty, and otherwise conduct Cook's business in a manner that is above reproach. Cook's principles of honesty and integrity are outlined in this Code of Conduct ("Code"). By reading, understanding, and taking ownership of this Code, we each take responsibility for sharing these values and for our own success, as well as the continued success of Cook.

This Code is the cornerstone of Cook's Global Ethics and Compliance Program ("Program"). This Code provides general principles to guide all of us in making ethical and sound business decisions. It is not meant to address every specific situation. Each of us must use common sense and good judgment, and ask for advice when necessary. The Program is also supported by a series of "Policies & Guidance" and also procedures developed to provide relevant information for specific job functions. The applicable Policy & Guidance documents and procedures referenced throughout this Code are available in each company through the compliance officer. It is your responsibility to know them. Additional program documents will be developed as needed.

2) Understand the intent and spirit behind the laws and the efforts of Cook, government regulators, voluntary trade organizations, and healthcare professional organizations in keeping our industry viable and respected.

#### 3) Report Violations of this Code of Conduct without Fear of Retaliation

Cook investigates and addresses all reported violations and suspected violations of this Code. Where allowable by law, you are encouraged to report violations of this Code to management or to your Corporate Compliance Officer **without fear of retaliation**. Cook will conduct a prompt and, wherever possible, confidential investigation of all reports. Retaliation in any form against an individual who reports a violation of this Code, applicable law or regulation will not be tolerated. For more information, see the "Employee Communication Card" section in the back of this Code of Conduct.

#### **Resource Center:**

Updated Ethics & Compliance Program documents and jurisdictional information is posted at <http://compliance.cookgroup.com>

Update notifications will be posted on Web Office.

This information will also be posted on the GTW and at <http://intranet.cook>

Also, see the Resources section at the end of this Code.

## **Integrity at Cook starts with you!**

## II. Your role in:

### Serving Patients

#### 1) Provide Quality Products in a Timely Manner

Ensuring a patient's health and well-being is our first and foremost objective. It is a big responsibility and one that Cook takes very seriously. It is Cook's purpose to design, manufacture and deliver products of the finest quality.

Cook's quality systems are described in the **Quality Policy Manuals** for each Cook manufacturing company. The manuals outline authorities and responsibilities, **Quality System Procedures** and instructions, management review and system effectiveness audits. Management is responsible for communicating and training employees on the parts of the Quality System that apply to their jobs. It is your responsibility to understand if and how the Quality System applies to your job.

#### 2) Understand Our Jobs and be Accountable for Results

Cook strives to provide safe and effective medical products to patients around the world. Patient safety and well-being are our highest priorities. Each of us must take responsibility for understanding and performing our own jobs to the best of our ability, every day. We must also be accountable for our actions. If at any time you have questions, Cook encourages you to consult with your supervisor, manager, department head or global functional leader.

#### 3) Follow Applicable Privacy Laws

Cook is committed to maintaining the confidentiality and integrity of protected personal information, such as medical health data, national identification numbers, and payment details provided to us by our employees, customers, patients and clinical trial participants. Cook is committed to following relevant privacy legislation in every country where we do business. National laws include the U.S. Health Insurance Portability and Accountability Act ("HIPAA"), the U.S./E.U. Safe Harbor Privacy Principles, the Canadian Personal Information Protection and Electronic Documents Act ("PIPEDA"), the European Privacy Directive, the Australian Privacy Law Act ("PLA") and the Japanese Personal Information Protection Law. In addition, there are specific state and provincial laws governing personal information and breach notification around the world. If you have questions or need additional information please contact Cook Group Global Privacy.

#### 4) Data Security

As a Cook employee, part of your necessary job function may include the lawful collection of protected personal information for purposes such as fulfilling an order for a custom medical device, device tracking, clinical research, quality assurance, marketing, research and development, human resources, information technology, customer relations or sales. All employees must follow Cook policies on the collection, transmission, use, disclosure, retention and secure destruction of data as outlined in the **Cook Policy & Guidance on Handling Protected Personal Information**, the **Cook Records Management Program** (with the applicable **Retention Schedule** being developed for each company) and the **Cook Electronic Information Policy**. In addition to the many national and local privacy laws worldwide there are many strict laws which require immediate notification to government agencies in the event of a breach or loss of protected personal information. Cook employees are responsible for understanding their role in this process. Transmission of protected personal information from country to country is heavily regulated and in many instances prohibited. All Cook companies that process, store or transmit credit card information for any purpose are obligated to comply with the Payment Card Industry Data Security Standard (commonly referred to as PCI compliance.) If you have questions or need additional information please contact Cook Group Global Privacy.

#### **Resource Center:**

Cook Group Global Privacy  
(812) 331-1025

<http://www.pcicomplianceguide.org/aboutpcicompliance.php>

**Disease is our  
competition.**

### III. Your role in:

## Fostering Best Business Practices

#### 1) Deal Honestly and Fairly in Business

Cook is fully committed to our tradition of strong customer relationships based on trust, knowledge, integrity, and the highest quality medical devices in the world. It is a guiding principle at Cook to deal with our customers honestly and fairly. Furthermore, you are asked to take the highest ethical road when interacting with competitors in the marketplace. Follow the requirements of the **Cook Policy & Guidance on Antitrust and Fair Competition**.

To maintain our ethical business practices worldwide, Cook will continue to seek the guidelines of industry-related organizations and may adopt those guidelines into our Program.

See the Resources section of this Code for a listing of separate Policy & Guidance documents for specific job functions within Cook. Copies are available through your HR Representative or Corporate Compliance Officer.

2) Follow a customer's internal policies and requirements, and those of individual political jurisdictions such as states, provinces, countries or medical societies with respect to doing business in their facilities, with their employees or their members. The specific rules or policies of an individual medical institution or a hospital system regarding interaction between the medical device industry and HCPs must be considered first, if more stringent than Cook policies.

3) Follow the **Cook Policy & Guidance on Interaction with Healthcare Professionals** which has been designed based on applicable laws and medical device industry standards with respect to meals, consulting arrangements, educational meetings, business meetings as well as bans on providing gifts, entertainment and recreation.

4) All corporate donations must comply with Cook policies and any applicable laws or guidance, such as those outlining appropriate interaction with healthcare professionals. Follow the **Cook Procedure on Responding to Funding Requests from Healthcare Professionals** for specific guidance.

#### 5) Adhere to this Cook Policy on Employees Accepting Gifts or Entertainment

Cook employees should not accept gifts or entertainment of more than a modest value, with the exception of a routine social function, from any individual or business in a position to gain from a relationship with Cook. This includes, but is not limited to, customers, vendors, consultants, and other potential business partners. Gifts of merchandise or products, as well as personal services or favors, may not be accepted unless they have a value of less than \$100.00 USD or the equivalent. This monetary limit is intended to serve as a guideline, and employees are urged to talk to their supervisor, manager or department head before accepting any gift of more than a modest value. It is never appropriate for a Cook employee to ask for a gift. A gift of cash or cash equivalent (e.g. securities) may never be accepted.

In some international business transactions, it is customary and legal for business leaders in a host country to present gifts to Cook employees. These gifts may be of more than a modest value and, under the circumstances, returning the gifts or paying for them may be an insult to the giver. In this situation, the gift must be reported to the employee's supervisor. In all other cases where a gift cannot be returned and where offering to pay for the gift would damage the business relationship, your supervisor must be notified. In some cases, a gift to an individual may be kept by the company, at the company's sole discretion. It is important that gifts do not influence, or appear to influence, business decisions.

6) Care must be taken when interacting with healthcare professionals who may be government officials according to the laws of the country where they practice so that the interactions are not considered to be unlawful bribes. See Section IV on "Interacting Honestly with Governments & Regulators" for more information.

#### 7) Follow the **Cook Accounting Policies and Procedures**

It is Cook's policy to comply with all financial and accounting regulations that apply to our companies worldwide. The **Cook Accounting Policies and Procedures** document guides our activities in this area. Employees must follow the applicable regional **Cook Expense Reporting Guidelines** for all expenses incurred on behalf of Cook.

8) It is Cook's policy to protect our intellectual property, and to respect the intellectual property of others.

## IV. Your role in:

### Interacting Honestly with Governments and Regulators

#### 1) Assure Regulatory Compliance

Medical care and associated equipment, devices and pharmaceuticals are regulated and monitored by a variety of government agencies around the world. It is Cook's policy that all Cook employees understand and comply with laws, regulations and government directives that apply to our business activities. Cook is committed to cooperating in an open, helpful and effective manner with regulatory agencies on matters of regulatory policy, compliance, product submissions and product performance.

It is Cook's expectation that all Cook employees provide accurate, relevant information and records as requested to government regulatory bodies that are legally authorized to ask for such information.

#### 2) Provide Reimbursement Information in terms of Product Support only

Cook has established the position of Director of Reimbursement and entrusted that person with properly establishing accurate reimbursement code information for Cook products through third party professional organizations. Cook employees are only to provide coding information to support Cook products and not provide an independent reimbursement coding consulting service for customers. In the U.S, follow the **Policy & Guidance on US Billing, Coding and Reimbursement Compliance**

#### 3) Appropriately Handle Third-Party Inquiries (e. g., Government and Media)

Cook will respond to legitimate third-party inquiries in a cooperative and responsible manner. Cook management must be informed immediately about any government, regulatory, or media inquiry in order to properly and completely respond. If you are contacted by an outside individual or agency, please report immediately to management or directly to the Cook Group Incorporated Legal Department at 812-339-2235. Media inquiries should be forwarded to your supervisor to be reported to the Public Relations department of Cook Incorporated, 812-339-2235.

#### 4) Practice Transparency

At Cook we have Policies & Guidance and also Procedures designed to help our employees appropriately interact with healthcare professionals in consulting arrangements for such things as clinical trials, product development and physician education. We have established a tracking system and training to comply with new disclosure laws.

#### 5) Comply with Applicable Laws and Regulations

It is your responsibility as a Cook employee to comply with laws and regulations that apply to our business activities worldwide. If you have any questions about how your job procedures comply with a law or regulation please ask your Manager or Corporate Compliance Officer.

#### 6) Cooperate with any Internal or External Investigation

It is Cook's policy to cooperate with internal and external auditors, investigators and governmental authorities. It is each employee's responsibility to maintain accurate records and documentation, and to cooperate fully with any internal or external investigation including potential compliance violations.

#### 7) Follow the **Cook Policy & Guidance on Political Interactions**

Cook employees should not attempt to represent Cook's position or stance on issues in the political arena without the approval of the Global Functional Leader for Legislative Affairs (in the US) or the President or Managing Director of the relevant Cook Company (outside the US). All federal state and local laws governing political contributions must be followed. Cook employees shall not provide gifts, services, entertainment or anything of value to political officials. Further, if a Cook employee in the US authorizes payment to an event sponsor at which one or more federal officials are honored or solicit our contribution, he or she shall report the details of the payment and event to the Global Functional Leader for Legislative Affairs.

8) Engage ethical business partners and associates.

Follow Cook procedures to research prospective business associates.

Observe the **Cook Policy & Guidance on International Trade** and the local laws and regulations which govern your business activities. Restricted countries with respect to doing business and a flow chart to help with decision making are located on the Global Technical Warehouse (GTW).

Verify that business partners and associates are legitimate, reputable and qualified and be mindful when interacting with government-owned healthcare facilities as the healthcare practitioners may also be government employees, implicating the Foreign Corrupt Practices Act (U.S.) and other regulations. Train distributors and other agents on Cook's Global Ethics and Compliance Program as a condition to doing business with them.

### **Resource Center:**

Regulatory Regions and Flow Chart:

GTW→Home→Regulatory→Global Regulatory Regions→  
Global Regulatory Matrix (CMI-Ready)

Director of Finance, Cook Endoscopy  
for tracking and disclosure of financial payments

Director of Reimbursement (Bloomington, IN)

Cook Group Legal Department (Bloomington, IN)  
(812) 339-2235

Knight Guardian Database (US)  
for vetting customers, banks, supply chain  
vendors, tenants and employees.

Chief Compliance Officer, Cook Group  
for international trade questions  
(812) 331-1025

Global Functional Leader for Legislative Affairs  
Cook Group, Washington DC Office  
(202) 509-0887

## V. Your role in:

### Caring for Cook

#### 1) Maintain Confidentiality

Cook has taken many protective measures to maintain the integrity of our proprietary and confidential business information, such as how we conduct our business activities, the identities of our customers, and our manufacturing methods and processes. As a Cook employee, you are trusted and obligated to always put the company's best interest above your own. Much of Cook's success is a direct result of employee values and loyalty. Public and customer confidence, along with employee loyalty, plays a key role in our continued success. In addition to protecting Cook's confidential information, we must do our jobs with diligence, care and skill.

Cook employees are obligated to protect the proprietary and confidential information and trade secrets belonging to the company. Your obligation continues even after you are no longer employed by Cook.

#### 2) Protect Intellectual Property

It is Cook's policy to protect our intellectual property, and we respect the intellectual property of others. Cook puts significant time, money and resources into developing our procedures and medical products. Our intellectual property includes, but is not limited to, processes, product designs, manufacturing methods, confidential information and our business practices. While some intellectual property is protected by patents, copyrights and trademark registrations that are enforced through the court system when necessary, it is also the responsibility of each of us to protect all company confidential information.

Cook is careful to limit exposure of our confidential intellectual property and we respect our competitors' efforts to do the same. Confidential information must not be shared with anyone outside Cook unless there is a company-approved confidentiality agreement in place. Likewise, we must not accept the confidential information of others, including competitors, without a real need for the information and a confidentiality agreement in place stating the permissible use or disclosure. You should contact the Cook Group Incorporated Legal Department at (812) 339-2235 for advice regarding the correct form to use in all cases when a company requests changes in our confidentiality agreement or insists on the use of their form.

#### 3) Avoid Conflicts of Interest

As a Cook employee, you must place Cook's interests above your own. You must avoid a conflict of interest or the appearance of a conflict. A conflict of interest exists if you find that your personal interest in a situation makes you unable to act in Cook's best interest, such as corporate investments or using a company's services for your personal gain. Contact your Manager, HR Representative, or Corporate Compliance Officer if you have questions or need advice.

#### 4) Appropriately Use Company Property

It is Cook's policy to maintain and protect company property from theft or destruction. All employees are responsible for properly using Cook's physical resources and property, as well as its proprietary and confidential information. Company property, facilities, and resources may not be used to conduct business, solicit sales, or distribute products or services that are not related to an employee's job with the company. The only exception is for charitable activities that have been formally approved in advance by company management.

#### 5) Follow the Cook Electronic Information Policy

It is Cook's policy that employees use our computer resources in a productive and professional manner for the benefit of the company and our customers. Cook has established guidelines for maintaining a secure environment for Company Information Systems. Access to computers, the Internet and e-mail is provided to benefit Cook and our customers. You are responsible for using computers, the Internet and e-mail in accordance with the **Cook Electronic Information Policy**, which must be read and signed (either as a separate agreement or as part of an employee handbook/manual) by those accessing Cook's system in any way. All employees are required to comply with this policy.

## 6) Maintain and Retain Accurate Records

Cook is committed to maintaining accurate and complete records on which it can rely to effectively manage its operations and to comply with record keeping and retention requirements of the laws that govern our business. As an employee you are entrusted with the responsibility for accurate preparation and careful maintenance of those records. Proper maintenance of records also includes the thoughtful destruction of records, because the retention of records beyond their usefulness and beyond legal requirements is both unnecessary and costly.

The **Records Management Program** is designed to provide Cook employees with guidance for the retention, storage and disposal of Cook's records. A new **Cook Record Retention Schedule** is being developed for each Cook company listing a retention period for every Cook record. It is the responsibility of each employee to be familiar with, and to strictly observe and follow, the **Record Management Program and also the Record Retention Schedule** when established.

## 7) Follow Cook Corporate Travel Policy and Procedures

Star Travel Services, Inc. has the responsibility to provide arrangements for transportation and accommodations for many employees who travel on Cook's behalf. It is Cook's policy to ensure that such travel is conducted in a reasonable and cost efficient manner, while minimizing the difficulties. The **Corporate Travel Policy and Procedures** booklet produced by Star Travel outlines the expectations for making business travel arrangements.

### **Resource Center:**

Cook Group Legal Department, Director of IP  
(812) 330-1824

Chief Information Officer or Chief Compliance Officer  
for Records Management Program questions  
(812) 339-2235

Star Travel, Inc., Corporate Compliance Officer  
(812) 336-6811

## VI. Your role in:

### Respecting Co-Workers

Each of us plays an important role in working together for the success of Cook and for the success of our colleagues. Our individual values and behaviors should reflect the highest standards of the organization and serve as an example for all to follow.

- 1) Recognize and develop the strengths of our individual differences.
- 2) Create an environment that allows all employees to fully contribute to the highest levels of our capabilities.
- 3) Treat each other with respect and common courtesy.
- 4) Protect each other from inappropriate behavior or treatment without fear of retaliation.
- 5) Be knowledgeable of and follow all policies in the **Employee Handbook/Manual** and do not tolerate workplace violence, harassment and discrimination.
- 6) Be safe. As an employee at Cook, you are expected to follow all environmental and safety rules and practices to protect yourself, our co-workers and our communities.

Safety is an integral part of our daily operations and it is the responsibility of all of us to be actively involved in following and creating safe work practices. Combining the following five elements with a common sense approach helps us prevent accidents and will provide a safe work environment:

- know and use safe work procedures
- avoid obvious unsafe acts
- keep your work area clean and uncluttered
- report accidents and injuries as they occur
- report unsafe work practices, conditions and procedures

#### **Resource Center:**

Cook Global Functional Leader of Human Resources  
(Vice President of HR, Cook Inc. Bloomington)  
(812) 339-2235

Diversity Statements  
<http://www.cookmedical.com/businessPractice.do>

**Diversity & Inclusion Spark Innovation.**

## VII. Your role in:

### Honoring our Communities and the Public

#### 1) Commit to the Communities Where We Work

Giving back to our communities is important to us. Cook companies have always strived to be good neighbors in the communities where we work and live. Our companies have a history of philanthropy and we encourage our employees to get involved in their communities by volunteering. Cook is committed to complying with applicable local ordinances and other local legal requirements.

#### 2) Protect the Environment

We are responsible for minimizing the impact our business activities have on the environment. Cook facilities must operate in compliance with all applicable environmental laws to protect our neighbors, our neighborhoods, and our businesses. Cook intends to reduce environmental impact by encouraging the adoption of environmentally-friendly practices in all areas of business.

#### 3) Immediately Report Breaches or Loss of Protected Personal Information (Data Breaches)

As a necessary job function, Cook employees will collect protected personal information for various purposes such as research and development, marketing, sales, regulatory, human resources and quality control. All employees must follow Cook policies on the collection, transmission, use, disclosure, retention and secure destruction of data as outlined in the **Cook Policy & Guidance on Handling Protected Personal Information**, the **Cook Records Retention Program** (with the applicable **Retention Schedule** being developed for each company) and the **Cook Electronic Information Policy**. These policies offer instruction on lawful collection, transmission, use, disclosure, retention and secure destruction of data. In addition to the many national and local privacy laws worldwide there are many strict laws which require immediate notification to government agencies in the event of a breach or loss of protected personal information. Cook employees are responsible for understanding their role in this process and are expected to immediately follow company reporting procedures. If you have questions or need additional information please contact Cook Group Global Privacy.

#### 4) Insider Trading

It is possible that during the course of working for Cook, you may become aware of material nonpublic information about a company with which Cook does business. It is Cook's policy that you may not, directly or indirectly through family members or other persons (a) buy or sell securities of the other company, or engage in any other action to take personal advantage of that information, or (b) pass that information on to others outside the company, including family and friends.

#### **Resource Center:**

Cook Group Global Privacy  
(812) 331-1025

Cook Group Legal Department  
(812) 339-2235

[Insider Trading—A U.S. Perspective](http://www.sec.gov/answers/insider.htm)  
(a speech by staff of the SEC)  
<http://www.sec.gov/answers/insider.htm>

**“We all have an obligation  
to society to give . . .  
do so without the feeling  
that you are ever going  
to have a reward.”**

## Cook Global Ethics & Compliance Contacts

### **COOK GROUP INCORPORATED**

Carol Seaman, Esq., VP and Chief Compliance Officer

Megan Charlesworth, Global Corporate Privacy and Compliance Administrator

Anita Shade, Research Specialist

Anna Farnam, Compliance Administration Assistant

Sharon Rogers, Executive Assistant

**(812) 331-1025**

carol.seaman@cookgroup.com

megan.charlesworth@cookgroup.com

anita.shade@cookgroup.com

anna.farnam@cookgroup.com

sharon.rogers@cookgroup.com

### **COOK BIOTECH INCORPORATED**

Cary Kerr, Director of Information Technology and Corporate Compliance Administrator

**(765) 497-3355**

ckerr@cookbiotech.com

### **COOK (CANADA) INC.**

Sherri Redshaw, HR Manager and Corporate Compliance and Privacy Administrator

**(905) 640-7110**

sherri.redshaw@cookmedical.com

### **COOK ENDOSCOPY**

Paula Joyce, VP - QA/RA and Corporate Compliance Officer

Scott Sewell, VP - Technology Acquisition & Development

**(336) 744-0157**

paula.joyce@cookmedical.com

scott.sewell@cookmedical.com

### **COOK FAMILY HEALTH CENTER INC.**

Becky Easton, Business Office Manager and Corporate Compliance Administrator

**(812) 330-9944**

becky.easton@cookgroup.com

### **COOK INCORPORATED**

Tom Roberts, VP - Quality Assurance and Corporate Compliance Officer

Lynn Ferguson, Software Quality Engineering Manager & Compliance Coordinator

**(812) 339-2235**

tom.roberts@cookmedical.com

lynn.ferguson@cookmedical.com

### **COOK IRELAND LIMITED and COOK GROUP EUROPE**

Alice O'Dwyer, VP, Cook Group Europe Human Resources  
& Corporate Compliance Officer

**353-61-334440**

aodwyer@cook.ie

### **COOK JAPAN**

Kuniomi Kitamoto, Representative of HR

**81-3-3468-9921**

kuniomi.kitamoto@cookmedical.com

### **COOK MEDICAL INCORPORATED**

Dave Reed, VP - Operations and Corporate Compliance Officer

**(812) 339-2235**

david.reed@cookmedical.com

### **COOK MYOSITE**

Erin Feth, HR Associate

**(412) 963-7380**

efeth@cookmysite.com

### **COOK PHARMICA LLC**

Ron Mobley, VP - Human Resources

**(812) 355-6746**

ron.mobley@cookpharmica.com

### **COOK UROLOGICAL**

Chris Kilander, Quality Assurance/Regulatory Affairs Manager  
& Corporate Compliance Administrator

**(812) 829-4891**

chris.kilander@cookmedical.com

### **COOK VASCULAR INCORPORATED**

Tom Kardos, VP - Regulatory Affairs and Corporate Compliance Officer

**(724) 845-8621**

thomas.kardos@cookmedical.com

### **GLOBAL THERAPEUTICS**

Devin McBlair, QS / RA Manager and Corporate Compliance Administrator

**(303) 460-1515**

devin.mcblair@cookgroup.com

### **K-TUBE CORPORATION**

Terry McCune, President and Corporate Compliance Officer

**(858) 513-9229**

tmccune@k-tube.com

### **MED INSTITUTE, INC.**

Rich Sisken, Corporate Compliance Officer

Kira Cooper, CCEP, Compliance Associate

**(765) 463-7537**

rsisken@medinst.com

kcooper@medinst.com

### **SABIN CORPORATION**

Mike Davis, Quality Assurance Manager and Corporate Compliance Administrator

**(812) 323-4500**

mike.davis@sabincorp.com

**STAR TRAVEL SERVICE, INC.**

Jeff Wright, VP - Agency Operations and Corporate Compliance Officer

**(812) 336-6811**

j.wright@startravelservices.com

**WILLIAM A. COOK AUSTRALIA PTY. LTD.**

Beverley Findlay, HR Manager and Corporate Compliance Administrator

**61-7-3340-1813 or 61-7-3340-1815**

bfindlay@cookaust.com.au

**WILLIAM COOK EUROPE ApS**

Nanna Andersen, HR Manager and Corporate Compliance Administrator

**45-56-86-86-86**

n.andersen@cook-wce.com

## **Employee Communication Card**

(for use where allowed by law)

You are encouraged to discuss work-related issues, questions and concerns with us without fear of retaliation. If you want to discuss any concerns, or make us aware of known or suspected violations of a law or Cook policy, you may contact any of the following:

1. Your **Supervisor** or **Manager**
2. Your **Production** or **Operations Manager**
3. Your **Human Resources Manager**
4. The **President** or **Managing Director** of Your Company
5. The **Corporate Compliance Officer** of Your Company

6. **Carol Seaman**

VP and Chief Compliance Officer, Cook Group, Inc.

PO Box 1608

Bloomington, IN 47402-1608

812.331.1025 ext. 2824

[carol.seaman@cookgroup.com](mailto:carol.seaman@cookgroup.com)

If you wish to report anonymously to a voicemail box, please call the following international toll free number: **866.971.3622**. Please leave a message with enough details for us to address the issue.

## Resources

*These resources are available through your Human Resource department, your Corporate Compliance Officer or online.*

### Cook Global

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Accounting Policies & Procedures

"The Basic Principles of Intellectual Property Law" (U.S., by Brinks Hofer, available from Legal Dept.)

Corporate Travel Policy & Procedures (by Star Travel)

Employee Handbooks/Manuals for specific Cook companies

Expense Reporting Guidelines (by Finance)

Policy & Guidance on: Antitrust and Fair Competition

Handling Protected Personal Information

Interaction with Healthcare Professionals

International Trade

Political Interactions

U.S. Billing, Coding and Reimbursement Guide &

U.S. Healthcare Provider Reimbursement Primer

Quality Policy Manuals (by Manufacturing companies)

Records Management Program

Electronic Information Policy

Record Management Policy

Record Retention Schedule (currently being developed for each company)

*Other Policies and Procedures for specific job functions*

### United States

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AdvaMed Code & FAQs <http://www.advamed.org/MemberPortal/About/code/>

ACCME Guidelines

[http://www.accme.org/dir\\_docs/doc\\_upload/68b2902a-fb73-44d1-8725-80a1504e520c\\_uploaddocument.pdf](http://www.accme.org/dir_docs/doc_upload/68b2902a-fb73-44d1-8725-80a1504e520c_uploaddocument.pdf)

AMA statement on gifts

<http://www.ama-assn.org/ama/pub/physician-resources/medical-ethics/code-medical-ethics/opinion8061.shtml>

Anti-Kickback Statute & Exceptions (Safe Harbors)

<http://www.oig.hhs.gov/fraud/docs/safeharborregulations/getdoc1.pdf>

Anti-Money Laundering (USA PATRIOT Act) <http://www.gpo.gov/fdsys/pkg/PLAW-107publ56/content-detail.html>

Foreign Corrupt Practices Act <http://www.usdoj.gov/criminal/fraud/docs/statute.html>

MDMA Guidelines for Interactions with Customers

<http://www.medicaldevices.org/public/documents/MDMAGuidelines.pdf>

OIG Compliance Program Guidance for Pharmaceutical Manufacturers

<http://oig.hhs.gov/authorities/docs/03/050503FRCPGPharmac.pdf>

PhRMA Code [www.phrma.org/code\\_on\\_interactions\\_with\\_healthcare\\_professionals/](http://www.phrma.org/code_on_interactions_with_healthcare_professionals/)

U.S. Federal Sentencing Guidelines Manual Chapter 8 [http://www.ussc.gov/2008guid/8b2\\_1.htm](http://www.ussc.gov/2008guid/8b2_1.htm)

U.S. Health Insurance Portability and Accountability Act (HIPAA)

U.S. Safe Harbor Privacy Principles

### Other

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Eucomed Code of Business Practices <http://www.eucomed.org/abouteucomed/ethics.aspx>

EU Privacy Directive

Japan Federation of Medical Devices Associations <http://www.jfmda.gr.jp/e/>

MEDEC's Code of Conduct on Interactions with Healthcare Professionals (Canada)

[http://www.medec.org/members/code\\_files/cofc.pdf](http://www.medec.org/members/code_files/cofc.pdf)

MATA & MIANZ Code of Practice (Australia/New Zealand) <http://www.mtaa.org.au/pages/page90.asp>

OECD Guidelines for Multinational Enterprises

[http://www.oecd.org/document/28/0,3343,en\\_2649\\_34889\\_2397532\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/document/28/0,3343,en_2649_34889_2397532_1_1_1_1,00.html)

Personal Information Protection and Electronic Documents Act (PIPEDA) (Canada)

<http://compliance.cookgroup.com> (new in July 2009)

GTW → Home → Compliance Program

## **Certification**

You will be asked to indicate that you have received, read, and will abide by this statement of policy by signing your name and dating an acknowledgment form and returning it promptly to your supervisor or manager (*the receipt will be attached to the booklet as a tear-off on the right side of this page when it is printed*).

Nothing in this Code of Conduct should be construed as a guarantee of employment for any period of time, nor does this Code of Conduct constitute a contract of employment. The Code of Conduct may be revised, changed or amended at any time.