

ARTED

Association of Research Based Medical Technologies Manufacturers

PRINCIPLES ON COMMUNICATION WITH HEALTH CARE PROFESSIONALS; ETHICAL RULES AND BUSINESS PRACTICES CODE

DIGITAL MEDIA AND SOCIAL MEDIA USAGE GUIDE

I. GENERAL RULES TO BE FOLLOWED BY THE MEMBERS

1 Introduction

ARTED has dedicated all its resources to contributing to the advancement of medical science, the improvement of services for patients and the development of high quality, innovative medical technology in the direction of achieving these goals. This aim of ARTED requires communication with third parties, by using the most up-to-date communication facilities, which include Health Care professionals, technical staff members within the healthcare institutions and organizations, as well as all other employees within the health sector.

All types of digital media, including Internet sites and pages, social network platforms, blogs, forums, and sites where users can interfere with the content, computers and virtual network-based environments and mobile applications play an important role in the communication and information sharing processes of ARTED member companies.

Medical device companies which are ARTED members use digital communication facilities in accordance with the applicable legislation and adhere to ARTED Health Care Professionals and Communication Principles, Code of Ethics and Business Conduct ("Code of Ethics") together with internal rules to fulfill their responsibilities for the development and improvement of medical technology.

This Guide (the "Guide") for Digital Media and Social Media Usage is intended for the implementation of Article 5.10 of the Ethical Code titled "Digital Media and Social Media Usage" and is in compliant with the current legislation.

In accordance with the applicable legislation, it is possible to promote devices that are exclusively used by healthcare professionals or devices that are covered by the reimbursement. Guidelines contradicting with this provision shall not apply to these products. In cases where these guidelines constitute contradiction with the related laws and regulations, the relevant laws and regulations will apply.

2 General Principles

2.1. The Members may communicate with third parties through any digital media in accordance with the applicable legislation and by adhering to the Ethical Code. In this context, they can create, manage and be a sponsor of Internet network (web) sites and social media accounts. The

Members shall be responsible for Internet sites and social media accounts that are set up by themselves, managed by themselves, or prepared and/or managed on behalf of them at their own requests.

- 2.2. Respectful, honest and transparent communication is essential in all digital media and platforms through which the members share and transfer information.
- 2.3. Any content to be shared by the members through all kinds of digital media should be in accordance with the current legislation, the ethical rules set forth within the Ethical Code and all business practices.
- 2.4. The content submitted by members via digital media and platforms shall be medically and scientifically accurate, up-to-date, balanced, reliable, fair and objective, clear and easy to understand. Information that contain claims should also have scientific references.
- 2.5. The rules and practices of ethical code promoted within this Guideline shall apply to all employees of member companies, to the extent that it may be applicable.

3 Internet Sites Created Personally by Members or Created on Their Behalf at Their Own Request

- 3.1. The members may personally create a website; have a website created on their behalf or may support websites to transfer information to Health Care Professionals ("HCP") and public, in accordance with applicable legislation and the principles set forth within the Code of Ethics¹.
- 3.2. Each website that has been prepared should provide a homepage; the related website should clearly state the following information:
 - The name of the member company owning the Internet site; mail/e-mail addresses and telephone numbers for site related communication;
 - The name of the member company supporting (sponsor) the Internet site; mail/e-mail addresses and telephone numbers for site related communication;
 - The information sources on the Internet site, the publishing/printing dates of the resources, and the names and addresses of the individuals and institutions that receive (and send) the information contained in the internet site if necessary;
 - The purpose of the Internet page and the target audience/audiences (for example physicians, pharmacists, patients, patient relatives or public) should be indicated.
- 3.3. The name of the Internet site and the homepage shall not contain an expression that may be interpreted as a product advertisement.
- 3.4. Internet sites including the names of products prohibited from being advertised are not considered compliant in accordance with the applicable legislation and Ethical Code by ARTED.

¹ The rules to be taken into consideration in relation with the Internet sites prepared for HCPs are listed in sub-heading (1) under Section II of this Manual; whereas, the rules to be considered in relation with public-oriented web sites are listed in sub-heading (3) under Section III.

- 3.5. The information on the Internet site shall be updated on a regular basis. If necessary, each section should be visibly marked with the latest update date for the page and/or article.
- 3.6. Each member, if it is perceived as being supported by him/her and is aware of the existence of an Internet site which is not governed in accordance with the applicable legislation, he/she should pursue legal proceedings without any delay, to end such activities.
- 3.7. Personal data collected through the Internet sites created by the members themselves or on their behalf, shall be kept strictly confidential. The Internet site must be arranged and administered in accordance with national, legislative and international rules on Protection of Personal Data, security and privacy. The privacy policy, terms of use, and information management shall be clearly indicated on the Internet site.

4 Social Media Usage

- 4.1. For HCPs and the public, the members can develop applications and share information on social media platforms of which the content is created by users, such as Facebook, Twitter, LinkedIn, YouTube, Instagram, Flicker, Pinterest, blogs, etc., in accordance with current legislation and Ethical Code.
- 4.2. Only persons duly authorized by members shall share information on social media platforms belonging to the members. Unauthorized persons should not introduce themselves as the official representative of the mentioned companies. These persons shall not interfere with the contents of the page or shall not load pictures, photos, slide shows, videos or links to such pages.
- 4.3. Any content and information to be shared must be in compliant with all applicable law and/or regulations and the Ethical Code.
- 4.4. Behaviors that lead to the privatization and personalization of the discussions via the social media platforms should be strictly avoided. The members shall ensure that all types of preventive mechanisms are used to avoid the formation or spreading of messages that may emotionally disturb people and that they shall not be disturbed by receiving such messages outside their own will.
- 4.5. Utmost care shall be taken in order to make social media communications as transparent as possible. On the other hand, unless there is a valid excuse, the writer of the related message must clearly state his/her open identity and for which member company he/she works under every message. Even if the person sharing on behalf of the member company uses a nickname, the person in question shall disclose his/her real identity, upon request. In a difficult situation, the company Compliance Officer should be informed.
- 4.6. When an employee of the member company sees a comment on an adverse condition of the company devices, then he/she should immediately inform the related person at the member company (social media manager, corporate communication, compliance officer, etc.) without making a personal comment about the matter.

- 4.7. In order to fulfill the responsibilities regarding the social media, no groups or accounts shall be formed on Twitter, Facebook and similar social platforms in which a company name or product name takes place, outside the knowledge of the authorized employees within the member company on communication policy.
- 4.8. Company employees should not share content that may be perceived or deemed as device advertisement, through their personal social media accounts.

5 References Made to Other Internet Sites and Pages (Giving Link)

- 5.1. Reference may be made (giving link) to an Internet site or social media account created or supported by the members; to Internet sites sponsored by member companies or to other Internet sites or to other social media accounts. Likewise, linking can be made to members' Internet sites and social media accounts from other Internet sites.
- 5.2. When a user is directed from an internet site of a member company or an internet site supported by a member company to a site that does not belong to the member company, this operation must be explicitly disclosed to the user.
- 5.3. It is recommended not to give links to Internet sites that are dynamic and constantly changing in terms of content and where it is difficult to control the content in accordance with applicable legislation and Ethics Code, such as blogs, forums, Facebook or similar social media accounts, and to Internet sites that are not supported by the members.
- 5.4. While giving link to other Internet sites, a warning message shall be placed stating that the information contained in the Internet site are not under the control of the member company; contents may differ from the texts approved by the Ministry of Health and these sites may not comply with the effective laws and regulations within the Turkish Republic.

II. PRINCIPLES OF COMMUNICATION TO BE ESTABLISHED WITH HCP VIA DIGITAL MEDIA AND SOCIAL MEDIA

In accordance with the effective legislation and the Code of Ethics, the advertisement of medical devices can only be carried out through digital media which is accessible by HCPs and technical staff members working in the field of medical devices within the healthcare organizations. In order to be able to advertise on digital media in this way, information given via digital environment and social media which is for HCPs and the public, shall take place in form of two separate sections.

Each member is expected to take effective measures in order to prevent non-HCPs to access promotional Internet sites or sections on digital media and social media.

Product representatives authorized by the member company's in order to carry out advertisements in accordance with the applicable legislation, can promote the related products via Internet (remote promotion) by visiting the HCPs instead of face-to-face visits. In such cases, all the conditions and rules that apply for the face-to-face presentation must be strictly obeyed.

All kind of product advertisements for HCPs using the Internet or digital media should comply with the applicable regulation/law and Ethical Code.

1 HCP Access to Promotional Internet Sites, Social Media Accounts and All Other Digital Medias

- 1.1. In order to be able to promote the devices in accordance with the current legislation, an explicit statement must take place atop the related section prepared for the HCPs (within the digital media) stating that the relevant section is for HCPs.
- 1.2. Instead of merely using the phrase "*Only for healthcare professionals.*", effective measures should be taken by utilizing warning questions such as "*Are you a healthcare professional?*" or "*Please declare that you are a healthcare professional.*"
- 1.3. Registry to applications specially for HCPs must be done by username and password; whereas registration, validation and data management must comply with the guidelines set forth in this Guide.
- 1.4. Before registering for the first time on an Internet site or any page and group created on digital media or social media, it is recommended to use difficult-to-declare methods such as asking for specialty and/or diploma number of the HCP and/or the school of graduation and to form merely HCP or technical staff options, other than information such as name, surname, organization name. Employees of the members are allowed to enter their own company sites.
- 1.5. The necessary information requested from HCPs during initial registry into digital and social media shall be collected in accordance with all applicable legislation and the appropriate rules and format set forth within this Guide. Confidentiality of collected information should be respected.
- 1.6. In order to be able to access the HCP later for publicity by using the collected contact information (e-mail, SMS, etc.), permission shall be obtained from him/her - wet signed or digitally approved - in accordance with the applicable law/regulation.

2 Internet Pages for HCPs and Including Product Advertisement

- 2.1. In case of providing information about the devices and advertising such devices on an Internet site and related pages for HCPs, which have been created or supported by the members, the public policy in the scope of this Guideline and the regulations in the current law/regulation and Ethics Code should be strictly obeyed.
- 2.2. The Internet site and pages for product advertisement may only contain information permitted for use during medical device advertisement in accordance with the applicable legislation.
- 2.3. If there is a section within the Internet site and related pages that have been created by the members and contain comments from the HCPs, the publishing and sharing rules to be applied upon these should be clearly stated in the Terms of Use section of the site. (*Monitoring the compliance of the comments in accordance with the Regulations and ARTED Code of Ethics*)

3 Social Media Usage Practices

- 3.1. The members may create accounts, pages, open or closed groups on social media platforms such as Facebook and Twitter in accordance with the applicable legislation.
- 3.2. Members can conduct corporate advertisement via the accounts that they have opened on social media sites such as Facebook and Twitter.
- 3.3. In case the relevant share, page, group or followers of the account are not all HCPs or are likely to reach people outside the HCP by duplicating public social media accounts, pages, groups and such media are not eligible for advertisement of devices that are not allowed to advertise pursuant to the legislation.
- 3.4. HCPs that create the target audience by creating a page on Facebook or similar social media or by creating a closed group may be invited to these pages and a platform where ideas are shared and discussed about a certain topic can be created. This platform may include presentations or discussions that contain the advertisement of devices that are not allowed to be advertised pursuant to applicable legislation, if they are open only to HCPs.
- 3.5. In accordance with the effective legislation, access to the page must be prohibited for anyone other than those who are permitted to advertise devices not allowed to be advertised. The member companies must take necessary precautions to ensure that information is protected and not shared; this comprises actions such as including solely invited people into the group; preventing the group and page members not to invite another member; the main pages not to contain correspondence with this group; and no-one to see personal comments made within this closed group.
- 3.6. The sponsor company will be responsible for all the comments made on closed groups and pages within the limits of the advertisement principles and applicable legislation. In environments, such as Facebook, where it is impossible to delete messages and transmissions written by others, the member who creates or supports the site will be responsible for the related results.
- 3.7. Creating a social media page to which only HCPs may become a member, and sharing links that contain information about the relevant devices on this page is possible as long as the content of the directed pages are in compliance with the applicable legislation, advertisement guidelines, Ethics Code and linking rules under this Guide.
- 3.8. The members shall refrain from sharing contents in a manner that would misrepresent the introductory messages about devices not permitted to be advertised in accordance with the legislation, in such a way as to give rise to the HCPs to share them with buttons such as "*Like*" or "*Share*". If electronic magazines (e-zine) and similar contents provided by the members are shared on social media or shared by way of other methods; product advertisements or the product name shall not be mentioned in such a way that these texts may be viewed in public places. Sharing contents that have been prepared for HCPs and that are intended for product advertisement can only be shared on social media by username and password entry according to the general rules.

- 3.9. There may be links such as "Share" or "Like" in e-magazines that do not contain device advertisements or any content that may be perceived as an advertisement, which are published by the member companies or under their support.
- 3.10. Words and expressions that should not be said during face-to-face interviews with the HCPs, should not take place also on social media.

4 Responding the Questions and Demands of HCPs

- 4.1. Literature and professional information requests placed by HCPs may be recorded by the members and replied in accordance with the advertisement principles accepted in according to the current legislation and Code of Ethics.
- 4.2. Members can benefit from the electronic mail system or social media to learn about HCPs' views about the Internet sites or devices. If information is received in this way, the same rules applied to questions and requests received via telephone, e-mail and other communication channels must be applied during this communication process.
- 4.3. In the event that HCPs transmit documents such as videos and presentations to members and request them to be published on internet sites or pages, the related members will be responsible for compliance with applicable legislation and Ethical Code with regards to such content.

5 Digital Based Advertisement Methods

- 5.1. Advertising activities using digital technology shall be carried out in line with the effective legislation and the Code of Ethics which are applicable to printed materials.
- 5.2. Resources (articles, posters, etc.) utilized in advertising activities and information about the device can be found in the digital media where the advertisement is made. If requested, the relevant reference, if any, can be shared with the HCP by taking care that the copyright is not infringed.

6 Information Sharing Via Digital Communication Tools

- 6.1. Electronic communication methods (e-bulletin, e-magazine, virtual congress, etc.) should be used carefully and with caution, by the members.
- 6.2. In accordance with the effective legislation, it shall be ensured that the information contained within publications such as e-bulletins and e-magazines prepared for HCPs suitable for advertising activities and technical staff working in the field of medical devices, are shared only with the above-mentioned people. Such information and publications shall not be shared on public social media such as Facebook, YouTube, Twitter, etc.
- 6.3. These publications should be archived in a format that can be accessed, reviewed and evaluated later, in case that there is an objection to the content of the publications or the compliance with the Ethic Code. If there is an objection about compliance, the status of the content shall be shared by the member.

- 6.4. The presentation of a speaker HCP may be shared with other HCPs, by recording (*Webinar, Live Broadcasting, webcasting*) this presentation simultaneously or later, with his/her colleagues in distant clinics and towns that are not in the same environment through Internet via voice, image and presentation content. Members may also sponsor this activity in accordance with the applicable legislation and the principles set out in the Ethical Code.
- 6.5. Confirmation from the people or groups to which the content will be sent shall be obtained prior to sharing the related content.
- 6.6. There should be warnings such as "*Quit Membership*" and/or "*Report Unauthorized Submission*" under the submitted digital content.

7 Promotion and Information Sharing Through Mobile Applications (Application)

- 7.1. Since the mobile environment can be freely searched, listed and displayed without restriction by the users, no information that will be deemed as device advertisement and is not allowed to be promoted in accordance with the legislation, may take place within the name of the developed applications, on the main page, within the entire content if it is publicly available and on the sample pages to be used.
- 7.2. The developer and the owner of the applications must be clearly indicated on the application advertisement page.
- 7.3. Members may sponsor mobile applications developed specifically for conventions; but the members cannot share in public spaces information that includes device name and device advertisement that cannot be promoted under his/her sponsorship.

III. PRINCIPLES OF COMMUNICATION TO BE ESTABLISHED WITH PUBLIC VIA DIGITAL MEDIA AND SOCIAL MEDIA

1 Corporate Internet Sites

- 1.1. Financial information for investors, Human Resources, job opportunities and application sections, press releases and public announcements not containing any product advertisement, product lists and prices, health issues related to specialty areas, developments in medicine, communication information and similar information may be included in the Internet sites of the members.
- 1.2. On condition that it complies with the current legislation, the members can provide public information via their official internet sites by using their devices.

2 Corporate Advertisement and Device Advertisement

- 2.1. The members may advertise on digital media and social media only devices that are permitted under applicable legislation. The content of these advertisements must comply with the principles set forth in the applicable legislation.
- 2.2. The members can conduct corporate advertisement via social media.

- 2.3. Members can create and promote informative platforms to raise awareness about diseases, on social media. Device advertisements should not be performed on these platforms.
- 2.4. The trademarks of the devices should not be used on public pages to create a perception of advertisement.
- 2.5. Members are not advised to create Internet sites under the trademark of their devices. However, trademark owners may purchase the rights of such internet pages to prevent third parties to purchase the rights for such Internet sites.

3 Promotion-free Internet Sites for Patients and the Public Which Aim Solely To be Informative About Healthcare

- 3.1. Internet sites including information about diseases, disease prevention, scanning and treatment methods, current medical practices, and other information intended to protect public healthcare may be created or sponsored by or on behalf of members. Members should clearly state that they sponsor these Internet sites.
- 3.2. The members shall conclude a written agreement with such individuals as they sponsor Internet sites prepared by third parties; whereas, the scope of their sponsorship and responsibilities of the sponsor should be clearly stated within this agreement. The responsible person/owner of the site shall be warned if it is identified that a device is utilized for commercial competition purposes in these Internet sites.
- 3.3. If a member wishes to provide unrequited support to a social networking site created by patient groups or HCPs and if the content of the forum/site is going to be determined entirely by the patient/HCP group; then it is recommended that a written contract is concluded including the details of the association or groups that will host such websites.
- 3.4. It is recommended that the supporter and its respective responsibilities are clearly stated in the terms of use of the Internet site.
- 3.5. Members should make sure that the purpose of the pages are clearly defined in the Internet sites they build or support for the public and the patients and there are no device names that are prohibited to be advertised.
- 3.6. No product advertisement shall take place in any part of the publicly accessible pages in accordance with the legislation; and no message, news or images that may be associated with the device advertisement shall be used in such environments; whereas, no direct or indirect connection between the device information and the disease information shall be established.
- 3.7. "*No information on this site can replace the act of consulting a physician or pharmacist*" or "*For further information please consult a physician and/or a pharmacist*" may be included on every page providing public healthcare information, outside the corporate pages of the members.
- 3.8. The relevant Internet pages and platforms may also include treatment methods other than those performed by devices; as well as diet, behavior modification treatments and similar

treatment methods may also take place therein. However, these internet sites and platforms shall not prompt the patients for a specific treatment. Instead, it should aim to inform the patient or his/her relatives about the symptoms.

- 3.9. Internet sites that create unnecessary hopes and offer a treatment method without physician opinion are contrary to ethical principles.
- 3.10. Members may prepare and disseminate a video that does not advertise the device by using viral marketing elements to advertise or promote a disease awareness platform that is open or supported by the members. In this case, the prepared video must not be perturbational and fear arising about the disease be in a structure directly orienting to a treatment, and shall be in compliant with the current legislation and the Code of Ethics.
- 3.11. Only the brand names of the devices permitted to be advertised in accordance with the applicable legislation can be specified and mentioned on internet sites and platforms for patients. The brands of devices other than these cannot be included in the public internet sites. On the other hand, it is not appropriate to use any color, logo or image that may be associated with the product.

4 Social Media Usage

- 4.1. Members can create and promote information platforms to raise awareness about diseases, on social media. Devices that are not allowed to be advertised under the related legislation should not be advertised on these platforms.
- 4.2. The members shall not get in contact with the patients and their relatives by obtaining their personal information directly or indirectly. However, members can create and promote informative platforms for patients and their relatives in order to raise awareness about illnesses, on social media (Facebook, Twitter, LinkedIn, YouTube, Google+, etc.).
- 4.3. Devices that are not allowed to be advertised under the related legislation should not also be advertised on these platforms.
- 4.4. Sharing of a video or presentation by the member or employee of the member company on public social media platforms, such as YouTube, that will be perceived as device advertisement/promotion for devices that are not allowed to be advertised under effective legislation will be in violation of applicable legislation and Ethics Code. The comment that the member company employee will make about his/her company shall not include any expressions that may be interpreted as device advertisement.
- 4.5. Devices that cannot be advertised in accordance with current legislation shall not be discussed on public pages of social media networks like Facebook. Otherwise, this behavior will be considered as an advertisement, in accordance with the relevant legislation.
- 4.6. Members may mention social responsibility projects or personnel policy on their public social media accounts. With regards to this issue, members must consider their own internal rules.

4.7. Members may contribute, by adding their data source, in editing data provided in sites such as Wikipedia, Ekşisözlük, Facebook walls and other similar places of which the content is created freely by the users. However, in any case, devices that are not allowed to be advertised in accordance with the legislation should not be a part of these advertising activities or interpreted as advertisement purposes. For example, sharing and adding public information about devices will be an acceptable contribution.

5 Information Sharing Via Digital Communication Tools

5.1. It is essential that the content sharing via digital communication tools is made in accordance with the group in which the stakeholder is classified. An e-bulletin for the HCPs and containing product descriptions shall not be sent to the patients and their relatives.