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## Attendance at Medical Procedures Policy

### Purpose

AngioDynamics Representatives (as defined below) are often present during surgery and other medical or clinical procedures (“Medical Procedures”). The purpose of this Attendance at Medical Procedures Policy is to provide direction and guidance for any employee, third party contractor, or representative of AngioDynamics and its domestic and foreign subsidiaries and divisions (collectively, AngioDynamics”) who is present during a Medical Procedure (each an “AngioDynamics Representative”), wherever the Medical Procedure is conducted (including, without limitation, hospitals, outpatient clinics, ambulatory surgery centers (ASCs) and office-based labs (OBLs)). The fundamental guiding principles are that an AngioDynamics Representative must never do anything that would compromise a patient’s safety or interfere with the physician-patient relationship or health care professional-patient relationship and an AngioDynamics Representative must never engage in the practice of medicine while attending Medical Procedures on behalf of AngioDynamics.

### Scope


This Policy applies to all AngioDynamics Representatives who attend Medical Procedures on behalf of AngioDynamics. An AngioDynamics Representative may be present during a Medical Procedure for the purpose of observing the Medical Procedure and/or providing information to health care professionals (“HCPs”) regarding the safe and effective use of AngioDynamics products and equipment (collectively, “AngioDynamics Products”).

### Overview

Clinical support, education, and training is provided by AngioDynamics Representatives who are trained in the safe and effective use of AngioDynamics Products. The scope of the clinical support, education, and training that may be provided is limited to the operating parameters of an AngioDynamics Product in accordance with the approved instructions for use (IFUs)/directions for use (DFUs) and accompanying operator’s/user manual(s) for the AngioDynamics Product (collectively, the “Product Labeling”). AngioDynamics Representatives cannot provide medical advice, medical opinions, or medical services. AngioDynamics Representatives cannot attempt to influence or participate in clinical decision-making but may impart information to HCPs that is consistent with the Product Labeling to reinforce evidence-based clinical practices.

An AngioDynamics Representative shall at a minimum, prior to and, where required, during a Medical Procedure:


- Ensure all required consent(s) have been obtained for the AngioDynamics Representative to be present during a Medical Procedure. For clarity, this does not mean the AngioDynamics Representative needs to obtain the required consents, just that any required consents have been obtained according to the facility’s policy and procedures.

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- Comply with all relevant medical facility policies and procedures including those policies and procedures related to vendor credentialing, facility access, security, safety, immunizations, and patient consent and privacy.
- Successfully complete an AngioDynamics-sponsored training program related to the safe and effective use of the AngioDynamics Products the AngioDynamics Representative supports, and remain current with AngioDynamics Product training.

An AngioDynamics Representative shall NOT enter the sterile field and shall NOT:

- Allow any person associated with AngioDynamics (e.g., visiting HCP, employment candidate) who has not met the requirements set forth above to be present at a Medical Procedure.
- Touch or make physical contact with the patient.
- Provide surgical, clinical, or medical advice, direct an HCP, “practice medicine” or do anything that may be construed as practicing medicine, nursing, or any other activity for which licensure or certification is required.
- Provide advice, information, or consent related to AngioDynamics Products for a purpose outside the scope of any AngioDynamics Product’s Labeling or for a contraindicated use. Important Note: AngioDynamics Representatives can provide truthful, accurate, and non-misleading information in response to questions from an HCP, and should engage AngioDynamics’ medical affairs team to provide additional information for questions that are outside the scope of the Product Labeling or are contraindicated for the applicable AngioDynamics Products.
- Setup or direct the setup of the procedure room unless specifically requested by a supervising HCP. AngioDynamics Representatives may provide information on the proper setup of AngioDynamics Products in accordance with the Product Labeling.
- Direct, handle, or provide advice for any AngioDynamics Products including products manufactured by other companies and/or products manufactured by other AngioDynamics divisions other than the AngioDynamics Product on which the AngioDynamics Representative has been trained. Important Note: AngioDynamics Representatives can provide truthful, accurate, and non-misleading information about the use of other companies’ products (that is set forth in the labeling material for such product) in connection with AngioDynamics Products in response to questions from HCPs about such use.
- Direct, handle, or calibrate any AngioDynamics Product while the AngioDynamics Product is in contact with the patient unless expressly directed by a supervising HCP. If directed by an HCP, the AngioDynamics Representative must repeat the instruction back to the HCP to confirm its accuracy and receive confirmation from the HCP prior to carrying out any such instruction on the AngioDynamics Product.
- Open AngioDynamics Product packaging for use during a Medical Procedure or transfer AngioDynamics Product into the surgical field unless directed by a supervising HCP. If directed by an HCP, the AngioDynamics Representative must repeat the instruction back to the HCP to

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confirm its accuracy and receive confirmation from the HCP prior to carrying out any such instruction with the AngioDynamics Product.


- Promote AngioDynamics Products to the staff or HCPs during a Medical Procedure; it is permissible to explain the features and benefits of an AngioDynamics Product when questioned, but promotional activities should be conducted at appropriate times and in appropriate settings.
- Direct HCPs or staff or control the Medical Procedure being performed. Interactions with HCPs and staff should be limited to appropriate communications to support and educate HCPs and staff on the safe and effective use of AngioDynamics Products.
  - AngioDynamics Representatives should respond to the specific queries, limiting the information supplied to refreshing the HCP's recollection of the appropriate directions for use and instructions accompanying the AngioDynamics Product, or describing the AngioDynamics Product's properties in accordance with the Product Labeling.
  - All information provided should be precise and factual and supported by (i) the Product Labeling or (ii) material provided by the AngioDynamics Medical Affairs Team; no opinions, judgments, or evaluations of either an AngioDynamics Product, other products, or the procedure technique should ever be offered.
  - If the AngioDynamics Representative recognizes that an AngioDynamics Product is about to be, or is currently being used improperly (e.g., for a contraindicated use or in a manner contrary to the AngioDynamics Product's Labeling) or patient safety is otherwise compromised such as from a failure to observe sterile technique, the AngioDynamics Representative should immediately alert the appropriate HCP to avoid any problem or harm.
- After any procedure, AngioDynamics Representatives should not touch or handle any AngioDynamics Products, instrumentation, material, or other products used in the procedure until the AngioDynamics Product, instrumentation, material, and/or other products have been cleaned, disinfected, sterilized, or otherwise handled in accordance with any hospital or AngioDynamics' guidelines regarding the handling of contaminated instrumentation, materials or other products used in the procedure unless requested or directed to do so by an HCP.

In rare and emergency circumstances where the patient's life is threatened, an AngioDynamics Representative should follow the facility's policies and procedures regarding providing life-saving assistance (e.g., assisting in the delivery of cardiopulmonary resuscitation (CPR)) or any instructions provided by the appropriate HCP.

## AngioDynamics Business Unit Obligations

Each AngioDynamics business unit shall:

- Maintain and provide training programs for AngioDynamics Products for AngioDynamics Representatives who may be present during Medical Procedures.

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- Ensure that all AngioDynamics Representatives are aware of all applicable governmental laws and regulations, medical facility policies and procedures, and AngioDynamics policies, including this Policy.
- Certify completion (and ensure current certification) of the training programs by the all AngioDynamics Representatives and maintain records of training and certifications to track completion of required training for all AngioDynamics Representatives.

## Exceptions

Any exceptions to this Policy must be approved by both the Law Department and the Corporate Compliance Officer.

## Compliance

All AngioDynamics Representatives are responsible for complying with this Policy, and the leader of each AngioDynamics business unit is responsible for ensuring that all AngioDynamics Representatives within its business unit have knowledge of and otherwise comply with this Policy when attending Medical Procedures.

## Reporting Options

If you have questions or concerns about our Attendance at Medical Procedures Policy, we offer the following resources:

- Email: [compliance@angiodynamics.com](mailto:compliance@angiodynamics.com)
- People you can talk to: Managers or Supervisors, Law and Compliance Teams, Human Resources Team
- Compliance Hotline, 24 hours a day, 7 days a week at 1-877-325-3781 or online at [angiodynamics.ethicspoint.com](http://angiodynamics.ethicspoint.com)

AngioDynamics will not tolerate any kind of retaliation against anyone who asks questions or reports a concern related to this Policy in good faith.

AngioDynamics will promptly investigate any alleged violations of this Policy and any violation of the Policy, retaliation against any individual reporting a violation, or failure to otherwise comply with this Policy will not be tolerated and will result in disciplinary action up to and including termination or dismissal.