

Sunshine Law

Under the federal “Sunshine Law”, all medical device and pharmaceutical manufacturers, including Smith & Nephew, are required to track and report payments and transfers of value to US-licensed physicians and teaching hospitals. The Centers for Medicare & Medicaid Services (CMS) released the Final Rule on February 1, 2013. Manufacturers must collect required data, January through December 31 of the current year and report to CMS by March 31 of the following year. CMS will publish the reported data on a publicly available website by September 30. Smith & Nephew is committed to full compliance with the Sunshine law. In order to comply, we will report payments and transfers of value provided to US-licensed physicians including the following in accordance to the Final Rule:

- Transportation expenses
- Lodging or accommodations
- Meals
- Certain educational materials (e.g. medical textbooks and journal reprints; S&N published items are not reportable)
- Other items that have an independent value

For more information on the Sunshine Law, please visit CMS National Physician Payment Transparency Program Open Payments web page at <http://www.cms.gov/OpenPayments/Program-Participants/Physicians-and-Teaching-Hospitals/Physicians-and-Teaching-Hospitals.html>