The Sunshine Act and Our Commitment to Transparency

Physicians and teaching hospitals are a vital part of our work to extend the benefits of minimally invasive surgery to the broadest possible range of patients, while providing extraordinary value. With the help of these important collaborators, we are able to advance education, training, product development, and clinical research efforts.

We value the input of the physicians and teaching hospitals that have collaborated with us in these areas, and are committed to transparency around compensation or other transfers of value we have provided to them. We require all employees and company representatives to act ethically and in accordance with all applicable laws and regulations, including the Physician Payments Sunshine Act (Sunshine Act), implemented as part of the Patient Protection and Affordable Care Act (Section 6002).

The Sunshine Act requires certain pharmaceutical and medical device manufacturers to track and report payments and transfers of value provided to U.S. licensed physicians and teaching hospitals to the U.S. Centers for Medicare and Medicaid Services (CMS). We expect to make our first submission of this detailed information to CMS in June 2014, as the Sunshine Act requires. This submission will cover transactions that occurred between August 1, 2013, and December 31, 2013. CMS expects to release the data publicly by September 30, 2014.

We have made several process and system enhancements to help ensure that our disclosures are complete, accurate, and fully compliant with the Sunshine Act. Additionally, we are committed to working with the physicians who collaborate with us to ensure that all records of such information are up to date. As such, we have proactively invited them to review our 2013 data in advance, prior to our submission to CMS.

After we submit this information to CMS, there will still be time to request clarifications or corrections. CMS will open a 60-day review and resolution period to allow physicians, teaching hospitals, and applicable manufacturers to identify and resolve disputes through the CMS system for any payments or transfers of value they believe require correction. Further information regarding the review and dispute process can be found at the following CMS websites:

**Physicians:**

**Teaching Hospitals:**

Please contact Sunshine.Inquiry@intusurg.com with any questions about the processes we have implemented to fully comply with the Sunshine Act.