



Policy on Responsible Marketing



Pacira BioSciences, Inc. (“Pacira” or the “Company”) is committed to thoughtful, conscientious, and patient-focused interactions with both the public and the broader healthcare community. Our external interactions, with both patients and providers, conform to our high medical, scientific, and ethical standards, and comply with all applicable laws, regulations, and industry guidance. They also conform to our core values, which prioritize patient safety and honesty.

In addition to our own policies, Pacira abides by applicable guidelines and codes established by national industry associations, as well as by major international industry associations. These codes and guidelines supplement applicable government regulation and provide guidance and self-discipline for ethical marketing practices.

In the United States, we abide by the PhRMA Code on Interactions with Healthcare Providers (HCPs), the PhRMA Guiding Principles on Direct-to-Consumer Advertising of Prescription Medicines, the OIG Compliance Program, and the AdvaMed Code on ethical interactions and relationships with HCPs.

This policy summarizes the Standard Operating Procedures (SOPs) supporting the Company’s approach to engagement with the healthcare community, including promotional engagement with HCPs and patients, and summarizes how we align with legal and industry guidelines.

Our Principles

- Pacira will only promote its products after the necessary marketing authorizations have been granted, and only for approved indications consistent with the approved prescribing information.
- We are committed to promoting our products in a truthful manner and to presenting information about our products in a way that is accurate, balanced, and does not potentially mislead the intended recipient.
- We will only promote our products to those whose interest or requirements in the particular information can be reasonably expected, based on the approved prescribing information.
- We will not make any unsubstantiated claims about the applications or benefits of any of our products in our marketing materials or practices and we will strive to make clear what is or is not a marketing material.
- We will not engage in scientific activities that appear to be promotional in nature or influence the prescription, sale, or use of our products.

Pacira will not utilize inducement or deception to engage with an HCP or to influence the recommendation, prescription, purchase, supply, dispensing or administration of our products.

Training and Compliance

We train all of our sales representatives on their responsibilities, which include the appropriate promotion of our products and on compliance with all of our marketing policies and materials, including that they must never provide any medical treatment, medical advice, or any diagnoses. We utilize appropriate training curriculums for our sales representatives and the products they sell. Our training consists of our own proprietary training curriculums, field-based training, reading materials, and interactive in-house training.

Pacira provides specialized external communications training to other employees who require an understanding of the policies, in particular to those in Marketing, Legal, Compliance, Medical and Regulatory roles, as well as to third parties interacting with HCPs and healthcare organizations on our behalf. All Pacira employees receive guidelines regarding our policies on external communications, as detailed in our Compliance & Ethics Manuals for the United States, European Union, and Canada.

All Pacira-related external interactions with the healthcare community, whether written or oral, including advertising, promotional labeling, other promotional materials, and non-promotional materials, including scientific/medical pieces, must be reviewed and approved either by the Company's Public Communications Review Committee (PCRC) or by designated Legal, Compliance, Medical and/or Regulatory Personnel.

Materials that must be submitted for review include, but are not limited to, the following:

- Promotional Materials

Promotional Materials may include advertisements (in print or other media), visual aids, brochures, sales aids, promotional exhibits, product websites, social media content, published journal articles, promotional slide presentations, testimonials, promotional kits, health economic outcomes information, patient or physician surveys, payer-directed and other market access materials and formulary kits.

- Scientific Exchange Materials

Scientific Exchange Materials may include medical congress exhibits, booth exhibits, external speaker materials, disease awareness materials, content regarding products in development, abstracts submitted for publication, materials to be used during any other meetings with HCPs.

All promotional and scientific exchange materials submitted for review are evaluated by PCRC for medical and scientific accuracy, appropriateness for the intended audience, quality control, conformance with all applicable laws and regulations, conformance with applicable health authority guidelines, and compliance with internal policies and the PhRMA code.

Interactions with Patient Groups

Pacira is committed to ensuring that all interactions with patient groups are conducted in a manner that is transparent, safeguards the patient group's independence, and excludes promotional activities.

Pacira employees interact with patients and patient organizations in various settings and circumstances, including hospital settings, health fairs, events organized by patient organizations or other programs. The goal for communicating with patients and patient organizations is to provide useful and understandable information about conditions and treatment options that will help patients partner with their HCPs to make more informed decisions about their treatment.

Pacira employees must interact and communicate with patients and patient groups in a manner that is truthful, not misleading, and appropriate for a non-healthcare professional or "lay" audience. Medical treatment, advice, or diagnosis must never be provided to patients even if the Pacira employee has a medical or scientific degree and training.

Interactions with the Public

Pacira is committed to ensuring transparent and ethical non-promotional interactions with the public regarding health campaigns and our presence in social media.

Pacira employees may not use personal social media for the purposes of promoting or discussing any Pacira product or any confidential or sensitive Company information.

If an employee chooses to like or repost a PCRC-approved social media post from any Pacira social media page(s), the employee may not make or respond to any comments on the shared post. Pacira employees also may not comment on Company posts on any Pacira profile page(s), the employee's personal page, or any other page, nor may Pacira employees respond to any comments on Company posts, whether on a Company page, the employee's page, or any other page, unless it is part of the employee's official job responsibilities to respond to such communications on behalf of Pacira. Pacira employees may not use personal social to like, comment, re-tweet or repost information from any customers' accounts or sites.

Interactions with the Healthcare Professionals

Pacira is committed to the principle that HCPs should prescribe Pacira products only when their use is clinically appropriate. Accordingly, Pacira employees may not provide HCPs with consulting fees, meals or other items of value that are conditioned, either directly or indirectly, on the purchase, prescription, use or recommendation of Pacira products. Pacira is committed to conducting all activities in compliance with applicable federal, state, and local laws, and to maintaining high standards of integrity in all of our interactions globally.

Pacira may engage with HCPs in other parts of the world. Just as in the U.S., many countries have regional, national, or local rules or standards that govern the way in which life sciences companies interact with HCPs. Any Pacira employee or third party interacting with global HCPs on behalf of Pacira is required to comply with all applicable standards of the local country and relevant Pacira guidance and policies specific to the appropriate geographical region. Engagement with a global HCP for any type of fee-for-service, such as consulting or an advisory board, must be approved by Pacira's compliance team prior to the engagement.

All communications with HCPs must always be truthful and non-misleading. Promotional communications, which are communications intended for the purpose of promoting, marketing, or selling Pacira products, must also be consistent with the United States Food and Drug Administration (FDA) or other Regulatory agency approved product labeling, such as the Prescribing Information or Instructions for Use.

Pacira employees must not engage in Off-Label or Pre-Approval promotion or solicit or prompt Off-Label or Pre-Approval questions. Only appropriate PCRC-approved materials may be used by employees; homemade or altered materials are prohibited. Pacira employees must always present information about Pacira products in a truthful, balanced, and non-misleading manner that presents both benefits and risks.

Transparency

We compensate physicians for any work or speaking arrangements they perform on our behalf at their fair market value, which is based on the physician's qualifications and the amount of time spent working or speaking on our behalf. We have developed standard operating procedures to

ensure that payments to physicians do not create conflicts of interest or otherwise persuade any treatment decisions these physicians make for their patients. In addition, we support the Physician Payments Sunshine Act—a United States healthcare law that increases the transparency of financial relationships between health care providers and pharmaceutical and medical device companies and helps to determine any possible conflicts of interest. We are required to track all of our financial transactions with HCPs for us each of our subsidiaries and annually disclose them in the Centers for Medicare & Medicaid Open Payments database.

As such, Pacira makes the following information available to the public on the transparency and product sections of its website at www.pacira.com:

- Payments and other transfers of value provided to US-licensed physicians
- Payments to US-based teaching hospitals
- Potential risks regarding the use of our products

Reporting Questionable Marketing Practices or Adverse Events

Any concerns about our marketing practices or any Adverse Events (AE) relating to us and/or our products can be raised to us, including by confidential means if desired. We have standard operating procedures and training in place to deal with complains, concerns, AEs, and anything else that may be voiced to us. Interested parties may also raise concerns directly with the appropriate Regulatory body (e.g. the FDA or other foreign Regulatory agencies).

Employees can speak with their manager, Human Resources business partner or Compliance contact or can raise concerns via a website, via post or via a toll-free confidential and anonymous helpline. All concerns are handled promptly, discreetly, and professionally. Discussions and inquiries are kept in confidence to the extent appropriate or permitted by law.

Any HCP, patient or member of the general public that wishes to share a concern regarding our marketing practices, an AE or Product Complaint related to any Pacira product(s), can do so anonymously by calling the safety monitoring hotline at (855) 793-9727, or by emailing drugsafety@pacira.com.

If any violations of our policies or requirements were to occur, our priority is to correct the problem in the most appropriate and expedient manner. Violations of our policies and requirements are handled in the same manner as regular disciplinary procedures and the responsible individual(s) are subject to training and discipline as appropriate. When necessary, we reserve the right to terminate employees who have engaged in misconduct and/or repeatedly violate our policies. Should an issue become a widespread concern, the remediation process will likely include changes to our standard operating procedures and include reinforcement training as warranted.