POLICY DEVELOPMENT AND MANAGEMENT PROCEDURE

POLICY NUMBER: CP-001.001	CREATED: SEPTEMBER 2018
DEPARTMENT: COMPLIANCE	EFFECTIVE DATE: OCTOBER 2021
RESPONSIBLE PARTY: COMPLIANCE MANAGER	LAST REVIEWED: JANUARY 2026
APPROVAL AUTHORITY: COMPLIANCE DIRECTOR	NEXT REVIEW DATE: JANUARY 2027

DocuSigned by:

Allyson Hammer

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Purpose

The purpose of this procedure is to establish clear standards for the development and implementation of policies and procedures in a manner that ensures compliance with all relevant laws and regulations.

Scope

This Policy applies to all policies, procedures, and desktop instructions throughout Amplifon Americas.

Key Terms

Please refer to the Amplifon Compliance Policy Definitions.

Policy

None.

Procedure(s)

1) The Compliance Officer is the Responsible Party for development, and subsequent revision, of new policies and procedures related to the structure and operation of the Compliance Program.

2) The Compliance Officer and the Compliance Committee are responsible for ensuring that policies and procedures related to the structure and operation of the Compliance Program have been developed, implemented, and are reviewed annually.

3) All compliance program-related policies will be submitted for approval to the Compliance Committee as the Approval Authority. These policies must describe the compliance issues in question, as well as a description of how the Policy will address the compliance issues. When requested, the Compliance Committee will receive a presentation of the Policy for approval.

4) Policies and procedures are to be reviewed annually and evaluated for revision and updating.

5) Policies and procedures related to operational compliance or business unit policies and procedures will be developed and revised at the direction of Senior Management, who will appoint a Responsible Party appropriate for the policy in question.

6) Each Responsible Party is charged with the following:
   a) Working with Regulatory Affairs, Legal and Compliance to identify relevant laws and regulations related to their business units. Developing policies and procedures designed to ensure operations are conducted in compliance with current laws, regulations, and organizational policies.
   b) Ensuring the appropriate distribution and training to those who are responsible for acting in accordance with Policies and Procedures, including documentation of that training.

    c) In conjunction with the compliance department, determining whether existing policies and procedures address identified risk issues.

    d) Ensuring that policies and procedures related to their areas of responsibility are current and up to date.

    e) Conducting the annual review and revision process (this includes Policies and the related Procedures and Desktop Instructions), and ensuring it takes place in a timely and an organized manner.

    f) Report to Senior Management on the status of Policy updates as requested.

    g) Maintaining a Departmental history file of non-current Policies for reference.

7) The following general format should be used for all policies and procedures:

    a) <u>Heading.</u> The heading includes the (a) Policy Title (top of the document), (b) Approval Authority, (c) Policy Number, (d) Department, (e) Responsible Party, (f) Date Created, (g) Effective Date, (h) Date Last Revised, and (i) Scheduled Review Date.

    b) <u>Policy Naming Convention.</u> All Amplifon Policies, Procedures, and Desktop Instructions will be named according to the guidelines in Paragraph 10, below.

    c) <u>Purpose.</u> Outlines the reason for or scope of the policy/procedure.

    d) <u>Scope.</u> Defines the individuals and/or Departments covered by the policy.

    e) <u>Key Terms.</u> Provides definitions for important terms used in the policy or links to a definitions document.

    f) <u>Policy.</u> Reflects the basic objectives of the organization and is a description of the general principles or courses of action.

    g) <u>Procedure.</u> Provides detailed procedural requirements and methods.

    h) <u>Regulations Reference.</u> Describes specific details of regulations or other authority that are reflected in the policy. All new policies and revised policies should note relevant regulatory/accreditation requirements that affect the policy's content. (If there are no requirements, indicate "None.")

    i) <u>Related Policy and Compliance Documents.</u> Provides references to other relevant Amplifon Policies, procedures and/or desktop instructions.

    j) <u>References:</u> The responsible party must cite any relevant references.

    k) <u>Version & Revision History</u>: It is imperative that the edits made be noted in the revision history to track changes over time.

8) All Policies remain in effect until they are revised or archived.

9) Any substantive revision made to an approved policy/procedure must go through the full review and approval process. The CEO of Amplifon Americas can make an exception to override the approval process, but no other staff are able to make such an exception.

10) All historical versions of policies (rescinded and revised) will be maintained by the responsible parties and the Compliance Department (Policy Administrator) to provide the ability to reference a version of a policy in effect at a specified point in time. All policy and procedure records maintained by the Policy Administrator in a systematic and logical manner and consistent with applicable law and regulation. The Policy Administrator will:

    a) Manage the process of archiving rescinded policies and procedures.

    b) Maintain a master list of Policy revision dates containing the following fields:

        i) Function

        ii) Policy name

        iii) Policy number

        iv) Responsible Party

        v) Date Policy was last revised

        vi) Next scheduled review date

    c) Send the reviewed policy or procedure through Docusign for signature by the Approval Authority.

    d) Ensure approved policies are posted on the Amplinet

11) Current Policies will be distributed and stored in the following manner:
   a) Policies will be stored on the Amplifon Amplinet under "Policies and Procedures,"
   b) a Policy's location will depend upon how widely the Policy needs to be distributed, and
   c) any Policy posted for any audience will be in PDF form.

12) Policies will be named according to the following conventions:
   a) Policies will be given names that correspond to the function responsible for the policy. Functions (FN) are:
      i)   Compliance Program (CP)
      ii)   Procurement & Vendor Management (PVM)
      iii) Marketing (MKG)
      iv)   Information Technology (IT)
      v)   Finance (FIN)
      vi)   Human Resources (HR)
      vii) Amplifon Hearing Health Care (AHHC)
      viii) Amplifon Canada (CAN)
      ix)   Miracle-Ear (ME)
      x)   Miracle-Ear Foundation (FDN)
      xi)   Legal (LEGAL)
      xii) Regulatory Affairs (REG)
   b) Within each Function (FN), policies will be given a unique number (PN). Policies must be numbered consecutively. Departments must work with Policy Administrator to ensure consecutive numbering.
   c) For Procedures (PR) and Desktop Instructions (DI), there will be an additional number after the Policy number with which it is associated. These numbers, too, must be consecutive with any other Procedure for the relevant policy.

13) The following is the naming convention for all policies:
   a) For a Policy: FN-PN POLICY NAME
   b) For a Procedure: FN-PN.PR PROCEDURE NAME
   c) For Desktop Instructions: FN-PN.DI DESKTOP INSTRUCTION NAME

14) Every time a policy or procedure is updated or revised, the version/revision table at the bottom of the document must indicate what and when was edited and by whom.
   a) All versioning will start over each calendar year.
   b) The version number will be in the format of YYYY.VI (VI is the version indicator and will be letters of the alphabet starting with A and progressing for subsequent versions in the same year.)
   c) Example: In the year 2022, the first version of the document will be 2022.A. If there is a second version in 2022, it will be version 2022.B and if there are more, the letters will continue. Then going forward, in year 2023, the first version will be 2023.A and so on if there are additional versions in that year.

15) If a Policy or Procedure is reviewed and no changes are made during the annual review process, the version/revision table must indicate it was reviewed and no edits were made. Then that version will be uploaded to the Amplinet to document that it is the current and recently reviewed version.

Exceptions

Information Technology Standards will be reviewed every two years or sooner, as needed, if any changes occur.

Related Policy and/or Procedure Documents

CP-001 Amplifon Compliance Program Policy

References

[Medicare Managed Care Manual Chapter 21: Compliance Program Guidelines](#)

Version & Revision History

Version Number	Date of Review	Who Reviewed	Brief Summary of Revisions (If None, Write None)
2022.A	May 3, 2022	Andrea Johnson	Converted document to the new template including the new versioning section. Updated the version/revision table and naming of files sections.
2023.A	April 14, 2023	Andrea Johnson	Annual review, made small edits to language throughout.
2023.B	June 23, 2023	Andrea Johnson	Added a note about no exceptions.
2024.A	January 3, 2024	Andrea Johnson	Annual review, minor layout updates, no edits.
2025.A	January 3, 2025	Andrea Johnson	Annual review. Added minor details throughout including more on revision history. Add exception of IT Standards.
2026.A	January 5, 2026	Andrea Johnson	Annual review, minor edits throughout to update function names and process.