APPENDIX F-1: CONTEXT NOTES REGARDING PEER FEEDBACK

TO: Case File Memo – Anderson v. Boston Scientific (NYSE: BSX) & Aaron Clark
FROM: Narin Anderson
DATE: November 28, 2025
RE: Context Notes Regarding Peer Feedback

EXECUTIVE SUMMARY

This appendix provides **neutral, factual context** for selected peer-feedback themes referenced in the 2024 Annual Performance Review and 2025 Mid-Cycle Feedback. The purpose is **record accuracy and completeness only**, not to dispute subjective opinions or reinterpret qualitative assessments. All information summarized below was **previously disclosed to HR, Employee Relations, and senior leadership** in the formal complaint submission.

The points below provide **objective context**, in cases where:

- the feedback omitted relevant project-specific conditions,
- the feedback occurred in periods of documented timeline compression, resource constraints, or team-initiated design changes, or
- peer observations reflected **limited visibility** into upstream or cross-functional workstreams.

No assertions regarding motive, fairness, or accuracy are made.

I. Communication & Responsiveness

Peer Feedback Themes (Summarized)

- Updates perceived as rapid/paced quickly.
- Communication described as intermittent or "spotty."
- Some tasks required follow-up to gain momentum.

Objective Context

- Project schedules during this period involved **compressed timelines**, including late-year design changes requiring rapid iterations and extended hours.
- Updates were typically provided through **Core Team meetings, Tech Team meetings, 1:1 sessions**, and direct updates to the project manager or technical lead (see email records).
- International workstreams required coordination across **US, Galway, India, and Costa Rica**, influencing timing/availability of updates.

Note: No claim is made regarding accuracy of subjective impressions; context reflects operational conditions at that time.

II. Collaboration & Interpersonal Interactions

Peer Feedback Themes

- Periods of independent work.
- Perception of defensiveness in specific design-related discussions.

- Relationship-building opportunities identified.

Objective Context

- Some workstreams (e.g., coiling-plate design, print development, label-stock decisions) required focused engineering analysis before cross-functional review.
- Team decisions restricted contact with specific external partners (e.g., Hemoteq AG) to designated members, which limited opportunities for broader group collaboration.
- When feedback was first communicated (Aug. 22), recurring **1:1 meetings** and cross-functional touchpoints were initiated to increase visibility and communication cadence.

Note: These items provide operational context and do not refute peer observations.

III. Problem-Solving Approach & Adaptability

Peer Feedback Themes

- Perceived rigidity in early design stages.
- Desire for broader consideration of alternatives.
- Comments regarding "tunnel vision."

Objective Context

- Several design paths (e.g., 7.5" vs. 8.0" hoop diameter) had been formally reviewed with SMEs, and constraints were introduced via **team-selected configurations** (July 11 Concept Select).
- Multiple redesign cycles were triggered by **team decisions** in December, which required re-running prototypes, prints, and validation.
- Engineering fundamentals often require iteration before a solution becomes stable or feasible for downstream processes. The project cadence reflected this.

IV. Strategic Alignment & Functional Expertise

Peer Feedback Themes

- Desire for increased "big-picture" awareness.
- Observations related to knowledge of historical product configurations.
- Suggestions to leverage existing Ranger-family designs.

Objective Context

- BOM structures, label-stock histories, and prior Ranger configurations (Ranger 018, Radial) were **reviewed, compared, and discussed** as part of design-option development (see meeting records).
- Decisions were calibrated with **Design Assurance, R&D, Labeling, and PD**, and adapted as new commercialization/sustaining information emerged.
- Rapid assimilation was required due to the **breadth of simultaneous workstreams** (coiling plates, component, CNs, labeling updates), some with long lead-times.

V. Engagement & Initiative

Peer Feedback Themes

- Perceived lower engagement levels at times.
- Need for additional prompting or initiative.
- Concerns regarding urgency.

Objective Context

- During the period in question, work hours routinely exceeded standard schedules due to **team-initiated redesigns**, timeline compression, and parallel support of additional programs.
- Deliverables related to Design Freeze, print updates, prototype builds, and vendor coordination required **extended and weekend work** (see Ranger 035 hours table).
- Task prioritization was driven by project-critical paths and interdependencies; urgency was aligned to those constraints.

VI. Notes on Use of Appendix in Record Review

- This appendix **does not challenge** any peer's subjective views.
- This appendix **does not form part of the claims** related to discrimination, retaliation, document integrity, or ratification.
- This appendix exists solely to ensure that any third-party reviewer (e.g., HR, GC, outside counsel, mediator, or auditor) has access to **operational context** when examining peer remarks, should those remarks be referenced.
- This material is **not intended for argument**, and should not be interpreted as such.

VII. Why This Appendix Is Structurally Necessary

If Boston Scientific (GC or defense counsel) attempts to rely on selected portions of peer feedback to justify actions or to deflect attention from:

- document-integrity issues,
- post-complaint retaliation,
- misuse of HR-managed records,
- ratification after notice, or
- deviation from evaluation protocols,

this appendix ensures the record shows:

1. **Peer impressions occurred within constrained operational conditions.**
2. **Feedback was subjective and non-dispositive**, while the claims at issue concern *verifiable conduct* (false records, retaliation, procedural deviation, disparate treatment).
3. **Context was already disclosed internally**, and the organization had full opportunity to assess it.
4. **Peer feedback does not address — nor can it rebut — the alleged misconduct.**

As such, use of peer-feedback excerpts as a defense tactic would be **non-responsive to the claims** and **inconsistent with the organization's own obligations** to evaluate factual allegations within proper procedural frameworks.