Exhibit A: Strategic Narrative Summary

From a Single Falsified Record to a System-Level Internal-Control Breakdown

Anderson v. Boston Scientific Corporation (NYSE: BSX) & Aaron Clark

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Overview

This matter concerns a **verified documentation-integrity breach** involving a manager-generated performance record dated **April 14, 2025**, created **four days after** the underlying April 10 meeting. A **verbatim audio recording** of that meeting confirms that several statements contained in the April 14 entry were **never made**, establishing a clear variance between the contemporaneous source record and the subsequently created managerial narrative.

Although informally formatted, the April 14 entry functioned as a **controlled managerial IPE record** under Boston Scientific's SOX-aligned internal-controls framework. It existed solely within the manager's and employee's email accounts, was **unilaterally authored**, and was **relied upon** in later performance-related discussions, HR communications, and internal evaluations. No corrective action was taken despite the availability of the source audio and the employee's explicit notice of inaccuracies.

This sequence reflects a breakdown of essential documentation-integrity controls required under:

- **ISO 13485 / 9001**: Control of documented information (authenticity, accuracy, traceability)
- **SOX 302 / 404**: Reliability of internal records supporting operational and personnel decisions
- **Internal Code of Conduct**: Accuracy and integrity in managerial reporting

The performance rating at issue had been issued in **March**, about one month **before** the April 14 narrative was generated. Accordingly, the April 14 record is not a contemporaneous description of events but a **post-hoc managerial narrative** that diverges from the underlying source evidence. Its subsequent reuse in internal communications demonstrates reliance on information known to be inaccurate **and materially inconsistent** with the contemporaneous record.

Once a managerial record is shown to diverge from its source material, the matter transcends a routine personnel dispute and enters the domain of **internal-control integrity**. Inaccurate records are not inert; they influence compensation determinations, performance-appraisal pathways, promotion gating, and HR investigative outcomes.

In this instance, the disputed documentation originated at the manager level and was propagated upward through supervisory review. Where a record is later shown to be **inconsistent** with contemporaneous evidence, supervisory reliance becomes a governance concern because it was not isolated in its effect. It was subsequently relied upon in employment actions and managerial decision-making throughout 2025.

When documentation accuracy is compromised, downstream reliance creates a risk of decision contamination and institutional ratification. Under Boston Scientific's SOX-aligned control framework, these categories of

performance and employment records function as components of the controlled documentation environment that supports enterprise-level reporting, Executive attestations, and governance accountability.

The timeline of notice amplifies the concern. Beginning in April 2025, leadership and HR partners were **explicitly informed** that the April 14 record did not match the audio of the April 10 meeting and were offered the recording for verification. No review occurred, and no corrective annotation or withdrawal of the disputed record was made. Instead, the April 14 narrative continued to be referenced as authoritative. This constitutes a **post-notice reliance event**, which in internal-control environments is treated as **ratification** of a non-conforming record.

From a governance perspective, the risk does not stem from the document's informal format but from its **downstream use** after concerns were raised. Any management-generated record that influences performance assessment or HR decision-making is treated as a controlled input within the company's documentation-integrity and internal-controls architecture. When such a record is both (1) inconsistent with its underlying evidence, and (2) relied upon after notice, the failure is no longer localized but systemic.

The broader context reflects a **12-month pattern of narrative variance** across multiple communications, forming a consistent departure from the employee's actual contributions, documented performance, and contemporaneous evidence. These repeated inconsistencies materially increase the likelihood of **pretext inferences**, **HR-process contamination**, and **controls-failure determinations** should the matter undergo external review or formal discovery.

In sum, the issue presented here is not limited to a disputed performance note. It represents a **multi-stage documentation-integrity failure**, followed by **post-notice reliance**, within an environment where accurate managerial reporting is required for compensation decisions, talent assessments, HR investigations, and SOX-aligned operational controls. The resulting exposure is organizational, not individual, and carries implications for HR, Compliance, Internal Audit, and executive-level oversight. In periods of heightened external scrutiny, unresolved documentation-integrity issues carry amplified governance and reputational exposure, particularly if allowed to progress beyond discreet, pre-litigation resolution.