

COMPLIANCE RULES

Given P28's commitment to compliance in all aspects of our business, it is imperative that our behavior reflect the utmost caution when interacting with HCPs, especially during P28-hosted events.

1. **FLIGHTS**: Only P28 personnel may book a plane ticket for a surgeon for the dates of the duration of the Course, *two nights only*. Surgeons may not book their own flights. We have structured timing to permit timely travel both ways relative to all home bases. Compliance rules dictate that we cannot facilitate a trip where even a portion relates to personal travel.
2. **MEALS**: P28 is providing dinner for attendees on *Friday* night. This is a working meal and part of the course—you are expected to attend with your surgeons. *Saturday* night dinner is optional – you may attend with your surgeons or you may host a business dinner outside of the Course at your own expense. If you choose the latter, you must abide by P28 internal F&B rules (max \$150 including tax, tip & 3 alcoholic drinks pp).
3. **LODGING**: P28 is providing a standard room for your surgeons for the two nights of the Course. P28 will not upgrade the room, cover any incidentals or extend the duration of the stay beyond two nights.
4. **BEHAVIOR & ATTENDANCE**: You may not host, arrange or pay for any type of recreation or entertainment for your surgeon and your surgeons are expected to attend the *whole course* to justify the flight, hotel and meal expenditures.
5. **GUESTS**: You may not encourage any type of guest presence. Should a surgeon bring a guest through no fault of your own, you may not provide nor pay for any guest expenses and you must inform that the guest may not attend any of the Course functions.
6. **REPORTING**: **Ensure that any and all HCP expenses are documented on your CMS report.** Surgeons are expected to pay for their own transportation to/from airports, parking, incidental travel expenses, etc. However, if you travel with a surgeon and share a ride, you must *apportion* the total cost amongst all present, including yourself. (Ex.: you split an Uber with one surgeon from the airport to the hotel costing \$32. On your CMS report, assign \$16 to the surgeon since the other half is apportioned to you.) Make sure you also report any transportation

to/from meals.

Delayed or missing CMS entries will be subject to the same discipline as normally applies to CMS reporting, including a hold of commissions, removal from rep roster and suspension of spend privileges.

7. **NO REIMBURSEMENT TO SURGEONS**. You may not reimburse a surgeon for any expenses they may incur during travel or attendance at the Course.

Any variance from these rules will be deemed an explicit compliance violation and the P28 personnel involved will be subject to discipline.

As always, if you have any questions or concerns about the above, please call me.

Thank you,

Michelle Missal
VP, Chief Compliance Officer
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