

# SEE P28 Rules and Guidelines

SEE P28 visits have the express purpose of educating surgeons on product, both in development and launched, as well as company mission and history. *These visits will not contain any discussion regarding consulting agreements or other work activities between a surgeon and P28.*

## **Pre-visit Logistics:**

- 3-week minimum notice required to schedule a visit.
- Sales Agency must register for the date of their choice in Hello Sponsor and gain approval prior to any discussion or planning with surgeon attendee.
- Either the Regional Sales Manager or Field Training Specialist must be present for the duration of the HQ visit.
- The following approvals must be attained via Hello Sponsor to set up the HQ Visit and prior to any travel arrangements being made.
  - Regional Sales Manager or Field Training Specialist (ENE, ESE, EGL, WMW, WWW)
  - Manager of Surgeon Education (Bryan Aspen)
  - Michelle Missal; VP and Chief Compliance Officer

## **Visit Schedule: HQ visits are hosted Monday through Saturday. Please choose one of the following options for the schedule of activities:**

Option 1) Arrive in Denver the evening before the HQ visit. That evening, have dinner on your own. Attend clinical activities the next day from 8am – 1pm. Depart for the airport at approximately 1:30pm.

Option 2) Arrive in Denver the morning of the HQ visit. Attend clinical activities, and then dinner on your own that same day. Depart the next morning.

## **Compliance Responsibilities:**

- Sales agency is responsible for both their surgeon's and their own airfare, dinner, and ground transportation. P28 will provide hotel accommodation for *one night*, and modest meals for the duration of the visit in Denver.
  - Flights must be limited to the duration of the one-night visit unless expressly authorized by the Chief Compliance Officer
  - Flight details must be provided to the Manager of Events and Tradeshow (Kristin Grunewald)
  - Dinner must adhere to internal cost maximums, which include beverages, tax and tip
  - Dinner must take place in the HQ locale, excluding downtown Denver
- Sales agency must book and pay for surgeon flights – surgeons will not be reimbursed for any costs/expenses incurred during travel.
- No spouses nor guests may attend.
- No P28 personnel will provide any entertainment or recreation for surgeon attendees.
- Sales agency must report surgeon flight, dinner and all ground transportation for the duration of the visit on their monthly CMS report.

**Any deviation from these, or any other P28 Compliance rules, will be considered an express compliance violation, and the Sales Agent/Rep/Employee will be subject to discipline up to and including termination of Sales Agent or Employment Agreement.**

**The Sales Agency requesting this visit must communicate the above Compliance expectations to the surgeon attendee, prior to the visit.**