

COMPANY EVENTS – P28 GUIDELINES – 1 or 2 NIGHT STAY

- **TRAVEL**

Only P28 personnel may book a plane ticket for a surgeon attendee for the dates of the duration of the Course, one or two nights only where a course ends past 3pm on the final day. Surgeons may not book their own flights. Should a surgeon wish to extend their flights on either leg, the responsible P28 personnel must contact the US Compliance Officer before purchase.

- **FOOD & BEVERAGE**

P28 HQ will provide modest food and beverage at its events, incidental to a bona fide presentation of educational, scientific and/or business information. If P28 personnel provide food and beverage before or after a Course ends, the meal must take place at a location close to the Course, and respect internal cost limitation for meals (\$150 including tax and tip) and alcohol maximums (3 total, including that provided by HQ for that day).

- **PROHIBITION OF GUESTS**

P28 personnel shall 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, including without limitation, meals.

- **PROHIBITION OF ENTERTAINMENT OR RECREATION**

As with any interaction with an HCP, P28 personnel shall not arrange, provide or pay for any type of entertainment or recreation incidental or as part of a P28 educational event.

- **REPORTING TRANSFERS OF VALUE / NO REIMBURSEMENT**

- All HCP expenses incurred by P28 personnel related to an event will be properly reported to the Compliance Department, including airfare, grounds transportation and meals.
- HCPs are responsible for their own ground transportation (unless P28 personnel are present), parking and other travel expenses. P28 personnel shall not reimburse HCPs for any expenses.

- **No CME Credit**

- P28 does not provide CME credit for attendance of its educational events.

Any inquiries about these or any other Paragon 28 compliance policies may be proffered to US Compliance Officer: Susan Cordle at scordle@paragon28.com or (401) 284-6866.