

## PURPOSE:

Integrity is one of the core values at Exactech. We value our customers and the patients' lives that we are striving to improve every day. It's important for Exactech that the interactions we have with our customers emulate integrity and foster a culture rooted in ethics. There are many laws and regulations that govern Exactech's relationship with HealthCare Professionals. Exactech has structured its policies and practices to abide by all laws and regulations to best serve our customers by protecting them from any appearance of impropriety or undue scrutiny. This travel policy is written with our customers in mind, to ensure that all Company business travel related expenses are appropriate and allowable under all applicable laws and industry code standards. Therefore, it is the policy of this company to reimburse only approved expenses that are identified within this document.

## DEFINITIONS:

Compliance maintains a comprehensive Glossary of Terms for key definitions. These keywords and terms may change from time to time. Please access the [Glossary of Terms](#) by following the embedded link.

[HealthCare Professional](#)

[MEDTECH EUROPE](#)

[Medtech Europe Code](#) ("MedTech Code")

<https://exactech.sharepoint.com/compliance/Compliance%20Wiki/Home.aspx>

## POLICY:

### 1. General Policy

Exactech requires that all travel bookings comply with this policy unless otherwise approved by the Company in writing and in advance. This policy is applicable to all Exactech sponsored events. Travel to Third Party Meetings is subject to individual countries rules, regulations, and applicable industry codes and therefore requires pre-approval by the Company's Compliance Department prior to booking any travel for such event.

Where the Company's Meetings & Events Team has organized lodging, car transportation, meals, etc., should a HealthCare Professional choose to make their own arrangements, the Company will not reimburse expenses for arrangements made separate from what has been organized by the Company's Meetings & Events Team.

Certain countries have laws and regulations obligating HealthCare Professionals practicing in those areas to abide by different travel guidelines. Where those laws and regulations are stricter than this policy, those laws must be followed.

All *Consultant* expenses must be reported to Exactech through the Company's online Work & Expense Report form. Should you wish to seek reimbursement for a high-cost expense, such as airfare prior to the event, you should complete the Expense Form found on the Company's website: <https://www.exac.com/consultant-forms/> and email the completed form, along with all receipts to [hcp.consulting@exac.com](mailto:hcp.consulting@exac.com). All expense reimbursement submissions must be accompanied by valid receipts for each expense incurred. Expenses submitted without receipts will not be reimbursed by the Company.

## 2. Air Travel

All domestic and international air travel with a continuous duration of less than five (5) hours will be arranged in Coach (Economy) Class, utilizing the lowest logical airfare. Any domestic or international flight with a continuous duration of more than five (5) hours may be arranged in Business Class. Where there is a distinction between Business and First Class for a flight, First Class is not permitted.

Consultants for Exactech who have special considerations (e.g., handicap, disability, physical considerations, etc.) may be entitled to business class travel for both domestic and international flights. Those who have a special need with which they would like special consideration should contact Exactech's Compliance Department. Documentation may be required to document the special consideration.

Travel arrangements for Healthcare Professionals should be done by Exactech dedicated employees using a local Travel Agency. For other cases contact Exactech's Compliance Department in advance.

The Company will not reimburse for airport club fees or day passes, nor will Exactech reimburse travel insurance. In case of travel cancellation, all airline reservations must be cancelled in advance through the same channel used to make the original reservations. It is not allowed to keep open the ticket in the name of the Healthcare Professionals.

Per the MedTech Code, Exactech is not allowed to organize or facilitate travel that extends prior to or beyond the Company's event dates. Therefore, all airfare must be booked only for the dates relating to the Company's event. Healthcare Professionals may arrive one day prior to the Company event and should book all departures no later than the day following the event. Air travel bookings that extend beyond the dates of the Exactech event are subject to no reimbursement by the Company. Should you have an extenuating circumstance you may contact Exactech's Compliance Department prior to booking a flight that does not comply with this policy to discuss.

It is not allowed to reimburse travel expenses relating to personal vacations, side trips, unrelated trip extensions, weekends, Saturdays or unnecessary stopovers even if such extensions permit a lower cost for the Company.

### 3. Rail Travel

Rail travel arrangements may be made when it is less expensive than air travel and does not add a significant amount of travel time to the trip. Rail travel may be booked in either Coach, Economy, or Business class.

### 4. Ground Transportation

Individuals should use the most economical mode of transportation to and from airports, rail terminals, hotels, and business destinations.

If an individual chooses to drive to their personal vehicle to the business destination instead of flying, the Consultant will be reimbursed for actual business km/miles driven according to the country allowable rate per km/mileage, or the total cost of air travel, whichever is less. Additionally, if mileage is reimbursed, Exactech will not also reimburse for fuel purchases. The km/mileage reimbursement rate covers fuel, as well as wear and tear on the personal vehicle.

The Company will reimburse up to a mid-size rental car when it is determined by the Company, in advance, that a rental car is necessary for business purposes. Any rental car class above mid-size is not permitted or reimbursable by the Company. Additional charges for insurance coverage or fuel charges from the Rental Car Agency are not reimbursable by the Company and are deemed a personal expense if added on with the rental car agreement.

Car services with a professional driver should only be utilized when the cost is comparable to a taxi, Uber, Lyft, or other reasonable transportation. Car service expenses will not be reimbursed if cost is excessive or determined to be higher than other reasonable modes of transportation.

### 5. Lodging

All room reservations must be made for a standard guest room, not upgraded room categories. Additional charges for upgraded rooms to executive floors, concierge levels or suites will not be reimbursed. Lodging expenses at top category, golf, resort, casinos, boutique or luxury hotels or 5 stars hotels are not reimbursed. Luxury chains include, but are not limited to, Four Seasons, Luxury Collection Starwood Hotels & Resorts, Mandarin Oriental, and Ritz Carlton Hotels & Resorts, SLH (Small Luxury Hotel), Boutique Hotels. These accommodations are absolutely excluded, regardless of whatever tariff, price or reductions and special conditions may be offered. Exceptions may be needed from time to time because of special circumstances. These exceptions might be considered for venues well adapted to business meetings in an otherwise compliant geographic location where there is a compelling need to use the chosen venue, for example, a lack of alternative venues or genuine safety or security issues. These special cases should be discussed and approved by the Compliance Department in advance.

In-room charges for mini-bar, movies/games, personal items (e.g. toiletries, magazines, aspirin, etc.) and health club/fitness center access fee charges will not be reimbursed. Room service is permitted, as long

as there is no meal provided by Exactech. An itemized receipt must be obtained for the meal, and the meal must adhere with this policy's meal limits.

## 6. Meals

All meals must be reasonable and modest. Exactech will reimburse Consultants for their personal meals while traveling for Exactech business up to the country meal limits defined in Appendix A of this policy. The receipt should detail the number of people served, date, itemized order detail (e.g. food and beverages), and the amount of the expense. Meal reimbursements permitted so long as there is no meal provided by Exactech. Exactech will not reimburse for meals or drinks purchased for anyone other than yourself while traveling on Exactech business.

## 7. Spouses and Guests

The Company does not reimburse or pay for any expenses related to a spouse or guest of a HealthCare Professional. It is not appropriate for spouses or guests to attend Company events, even if expenses are paid by the HealthCare Professional.

## 8. Disclosure Requirements

For Consultant, a notification letter to his/her Superior should be included when entering in the contract agreement to ensure transparency of the courtesies provided for the services for the duration of the contract. For all other HealthCare Professional a yearly notification letter is required to notify his/her Superior to the attendance of Exactech sponsored events for the duration of a calendar year. In some countries stricter formal approval requirements applies therefore refer to the appendices of this document. The notification letter is not required if the HealthCare Professional are owner of the healthcare institutions.

Transfer of values could be disclosed in some countries depending on the national laws and regulations in place in accordance with the transparency principles. In some instances, individual consent is required.

## 9. Scope

This policy applies to all HealthCare Professionals residing in Europe, Middle East, and Africa (EMEA).

## 10. Responsibilities

Exactech's Compliance Office shall be responsible for implementing this policy.

## 11. Effective Date

This policy and revisions thereto shall be effective as the date of approval by action of the Compliance Committee or such other date as may be determined by the Compliance Committee. This

policy shall remain in effect unless and until it is revoked, revised, or superseded by action of the Compliance Committee.

**12. Exceptions**

Exceptions to this policy shall be made only with the written approval of the Chief Compliance Officer, or designee, and only if the exception would not give rise to a violation of any law or regulation.

**13. Revision History**

Date of Compliance Committee Approval	Effective Date	Revision	Purpose of Revision
February 4, 2019	March 4, 2019	Original Issue	

**REFERENCES:**

None

**APPENDIX A**

<b>EMEA Consultants*</b>	
Breakfast	25
Lunch	25
Dinner	50

\*All rates in the currency of the country and only actual expenses incurred shall be reimbursed. Beverage, tax, and tips are included.

## FREQUENTLY ASKED QUESTIONS (FAQ)

1. If we have an internal event like a satellite symposium hosted in a room during a Third Party Congress for example in a 5 stars hotel location, are we allowed to accommodate the participants to our event in this hotel?
  - a. No. The accommodation for the participants should be done in another hotel compliant to our courtesies, the meeting can be hosted in the location provided by the Third Party Congress package.
  
2. Will Exactech reimburse my expenses for a guest traveling with me to an Exactech event?
  - a. No. Exactech does not reimburse for spouses or guests of a HealthCare Professional to an Exactech event, nor is it permissible for spouses or guests to attend business meetings and dinners related to Exactech.
  
3. My flight itinerary states my flight time is 4 hours and 55 minutes, may I fly Business Class since it is almost a 5-hour segment?
  - a. No. The flight time specified on the printed itinerary must be for a minimum of 5 hours for a continuous flight segment.
  
4. I want to stay an extra week after an Exactech event for personal reasons. Can I book my flight for dates that extend beyond the Exactech event?
  - a. Airfare tickets purchased for travel dates that extend prior to or after an Exactech event are subject to no reimbursement. Should you feel you have an extenuating circumstance due to logistics needs (for example flight connections), you should contact Exactech's Compliance Department prior to booking travel.