



| POLICY | CONSULTANT TRAVEL (UNITED STATES & OTHER AMERICAS) POLICY CEP-101-104| REV F

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 and specific to Exactech Consultants in the US, Canada and LATAM 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.

Advanced Code of Conduct on Interactions with HealthCare Professionals

Consultant

Healthcare Professional (HCP)

POLICY:

1. 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. Therefore, these require pre-approval from 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 Consultant 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.



| POLICY | CONSULTANT TRAVEL (UNITED STATES & OTHER AMERICAS) POLICY CEP-101-104| REV F

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. All expense reimbursement submissions must be accompanied by valid receipts for each expense incurred. All meal receipts over \$10 must be an itemized copy of the food and beverages. 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.

It is the responsibility of the Consultant traveling to notify the Company's booking agent and Exactech personnel immediately of any cancelations. Any fees associated with cancelations that are not at the Company's request will be the responsibility of the Consultant. Reservations should be made at a minimum of 14 days in advance unless Company request is less than that time-period. The Company will not reimburse for airport club fees or day passes, nor will Exactech reimburse travel insurance.

Per the AdvaMed Code of Conduct, 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. Additionally, Exactech, or its travel agent, will not make changes to flights for reasons unrelated to Exactech's business purpose. Consultants are responsible for any fees associated with modifying the original booking. Furthermore, should a modification be made by the Consultant to the original booking made by Exactech which results in a monetary credit to the traveler's airline account, it is the responsibility of the Consultant to notify Exactech of the credit received and reimburse the Company for the total credit issued.

Consultants may arrive one day prior to the Company event and leave no later than the day following the event. The Company's booking agent shall book the most reasonable flights available. Air travel



| POLICY | CONSULTANT TRAVEL (UNITED STATES & OTHER AMERICAS) POLICY CEP-101-104| REV F

bookings that extend beyond the dates of the Exactech event may not be booked by Company's agent and are subsequently not subject to any reimbursement by 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 their personal vehicle to the business destination within the US instead of flying, the Consultant will be reimbursed for actual business miles driven according to the current United States Internal Revenue Service allowable rate per mile, or the total cost of air travel, whichever is less. Additionally, if mileage is reimbursed, Exactech will not also reimburse for fuel purchases. The 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. Prior to the return of the rental vehicle, the traveler is expected to refuel back to the level when the vehicle was initially picked up. Any rental car class above mid-size is not permitted or reimbursable by the Company. Additional charges for insurance coverage or refueling 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.

Taxis and ride-share services such as Uber or Lyft are the preferred form of ground transportation for the Company. Only economy ride-share options are allowed. Luxury or oversized ride-share services will not be reimbursable by the Company. Car services with a professional driver should only be utilized when the cost is comparable to a taxi or economy ride-share transportation options. Car service expenses will not be reimbursed if cost is excessive or determined to be higher than other reasonable modes of transportation available.

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



| POLICY | CONSULTANT TRAVEL (UNITED STATES & OTHER AMERICAS) POLICY CEP-101-104| REV F

reimbursed. Luxury hotels are not to be utilized unless the Company has a room block for a specific event. 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.

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 are 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 Consultant. It is not appropriate for spouses or guests to attend Company events, even if expenses are paid by the Consultant.

8. Scope

This policy applies to all Exactech Consultants residing in North, South, Central, and Latin America.

9. Responsibilities

Exactech's Compliance Office shall be responsible for implementing this policy. Exceptions to this policy shall be considered only in special circumstances and 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.

10. Effective Date

This policy and revisions thereto shall be effective as the date of approval by action of the Compliance Committee and/or designee or such other date as may be determined by the Compliance Committee and/or designee. This policy shall remain in effect unless and until it is revoked, revised, or superseded



| POLICY
| CONSULTANT TRAVEL (UNITED STATES & OTHER
AMERICAS) POLICY
CEP-101-104| REV F

by action of the Compliance Committee and/or designee.

REFERENCES:

APPENDIX A

United States & Canada Consultants*	
Per Diem	\$100
*In the event an Exactech-hosted meal is provided that day, the per diem will be reduced to \$50	
LATAM Consultants*	
Breakfast	\$25
Lunch	\$25
Dinner	\$50

*All rates in USD and are inclusive of applicable taxes and gratuity. Only actual expenses incurred shall be reimbursed.

FREQUENTLY ASKED QUESTIONS (FAQ)

1. Can I get reimbursed for using my private plane to attend an Exactech event?
 - a. No, due to potential legal and liability issues that may be posed on Exactech, the Company will not reimburse any costs to you should you decide to fly your own plane to an Exactech event.
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. Exactech's booking agent will only book airfare for the Company's designated travel dates. All airfare must be booked by the Company's booking agent. After the ticket is purchased, if you choose to make changes these will be at your own cost. It is the responsibility of the Consultant to notify Exactech of any credit received and reimburse the Company for the total credit issued that result from those changes.
5. Are the meal limits inclusive of tax and tip?
 - a. Yes, all meal limits are inclusive of tax and gratuity/tip and are the total amount allowed for reimbursement by Exactech. Please note, these meal limits are those meals in which you are having on your own while traveling, etc. Meals that take place for a company organized business meeting or event do not follow these limits.

REVISION HISTORY:			
Date of Corporate Governance Review Board Approval	Effective Date	Revision	Purpose of Revision
29 Oct 2018	1 Jan 2019	-	Original Issue
21 Jun 2019	25 Jun 2019	A	Updated Template
9 Dec 2019	19 Dec 2019	B	Updated due to Company engaging booking agent
18 Jun 2020	18 Jun 2020	C	Changed the daily meal limits for US Consultants to a per diem
28 May 2021	1 Jun 2021	D	Clarified no changes to flights by company for personal reasons; Any credits made to HCP after they modify flight must be reimbursed to Exactech; Updated ride-share options permitted. (Approved via email)
28 May 2021	6 Jun 2021	E	Designated that the policy is specific to Exactech Consultant travel. US, Canada and Other Americas Non-Consultant reimbursement is now covered in CEP 101-136. Clarified refueling of rental vehicles. Formatting and minor changes for clarity.
8 Sep 2022	19 Dec 2022	F	Updated logo and made the policy applicable to Consultants. Non consultant reimbursement now covered under separate global policy