

AdvaMed Device & Diagnostic Compliance Group Benchmarking

January 2025
(2024/2025)

HCP Travel

Distributed: December 4, 2024 – January 13, 2025
Collated: January 14, 2025
Questions: 35
Submissions: 37
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BACKGROUND

AdvaMed surveyed its members regarding their policies on travel with U.S. Health Care Professionals (US HCPs). Thirty-seven companies completed the survey in December 2024 and January 2025. This document summarizes the survey responses, including additional commentary submitted by some (but not all) companies. The responses reflect a broad cross-section of company policies and are not intended to reflect all medical technology companies.

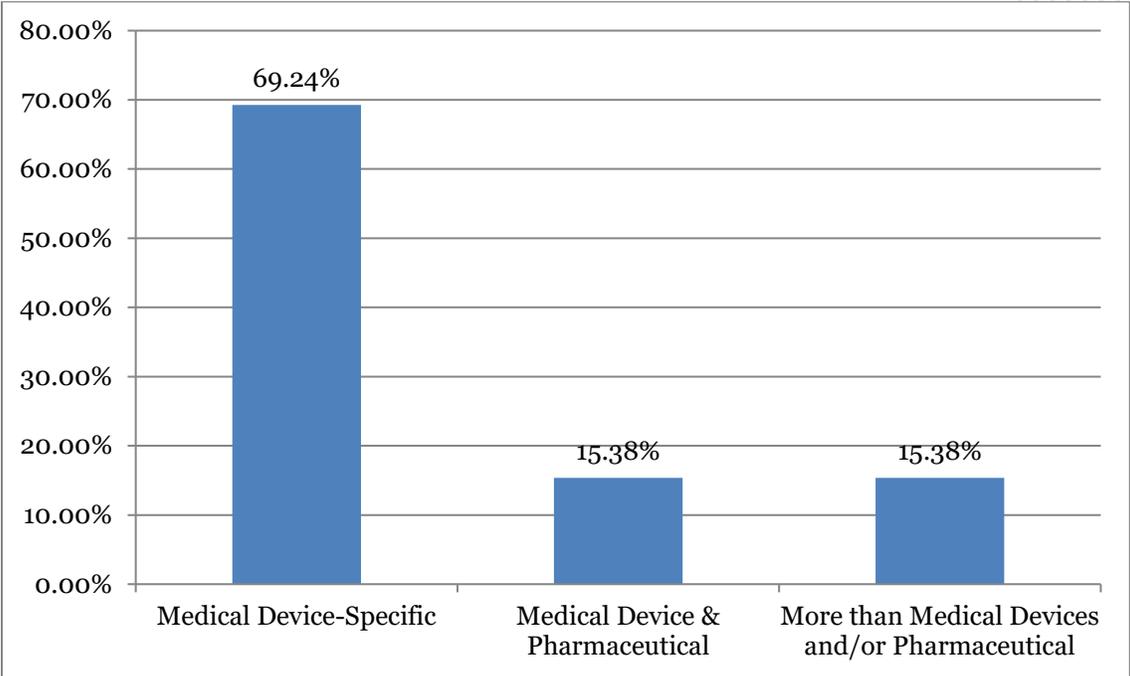
AdvaMed strongly encourages companies to adopt policies on travel provided to U.S. HCPs, including addressing many of the aspects summarized in this benchmarking data.

Note: AdvaMed periodically gathers and shares information from Member companies in order to assist companies in understanding industry trends and practices when the information is not competitively sensitive. In all cases, it is understood by AdvaMed and its Members that any company policy or practice that is adopted as a result of this sharing of information is done voluntarily and is a decision by the individual member. The information contained in this report is intended to provide benchmarking data on companies' existing policies only. It is not intended to endorse or mandate any one particular approach for medical technology companies' policies on HCP travel.

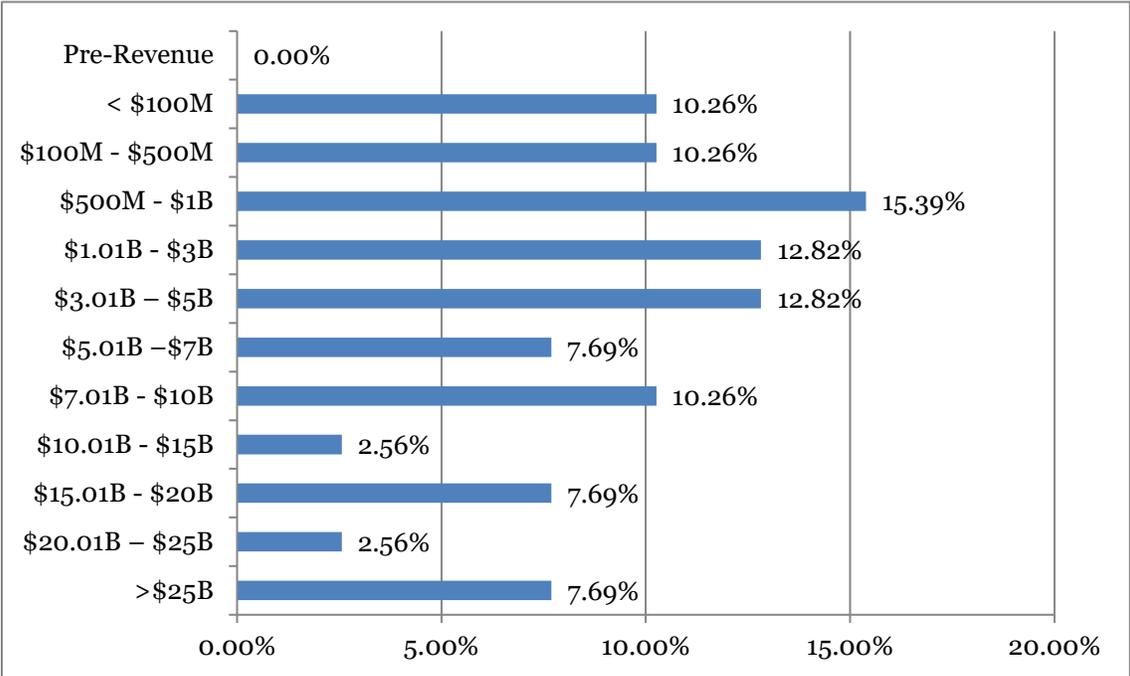


Demographics

3. Which below best describes your company?

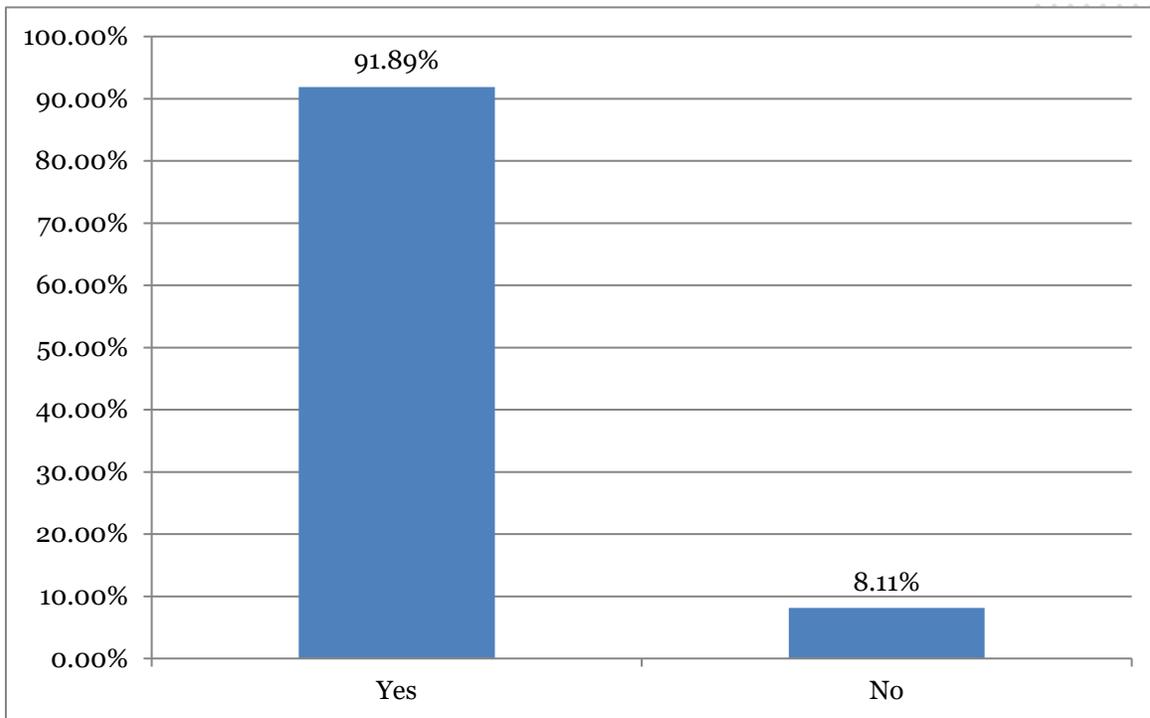


4. What was your Company’s 2023 worldwide device-related gross revenue?



HCP Travel Policies

5. Does your company have an established policy concerning HCP Travel?



2023 & 2024 Comparison
(24 respondents in 2023 compared to 37 respondents in 2024)

Have Established HCP Travel Policy	2023 Responses	2024 Responses
Yes	96.00%	91.89%
No	4.00%	8.11%

Comments:

- Contract specifies reimbursement of reasonable travel expenses, generally within economy class only. There are also internal guidelines specifically for HCP speakers and consultants (service provider) travel expenses.
- Customer Travel Agency Guidelines, but also included in our Global Interaction Policy and regional requirements are documented in our Country Supplements.
- May occasionally pay for an HCP’s modest and reasonable travel and lodging when travel is necessary to conduct an effective business meeting.

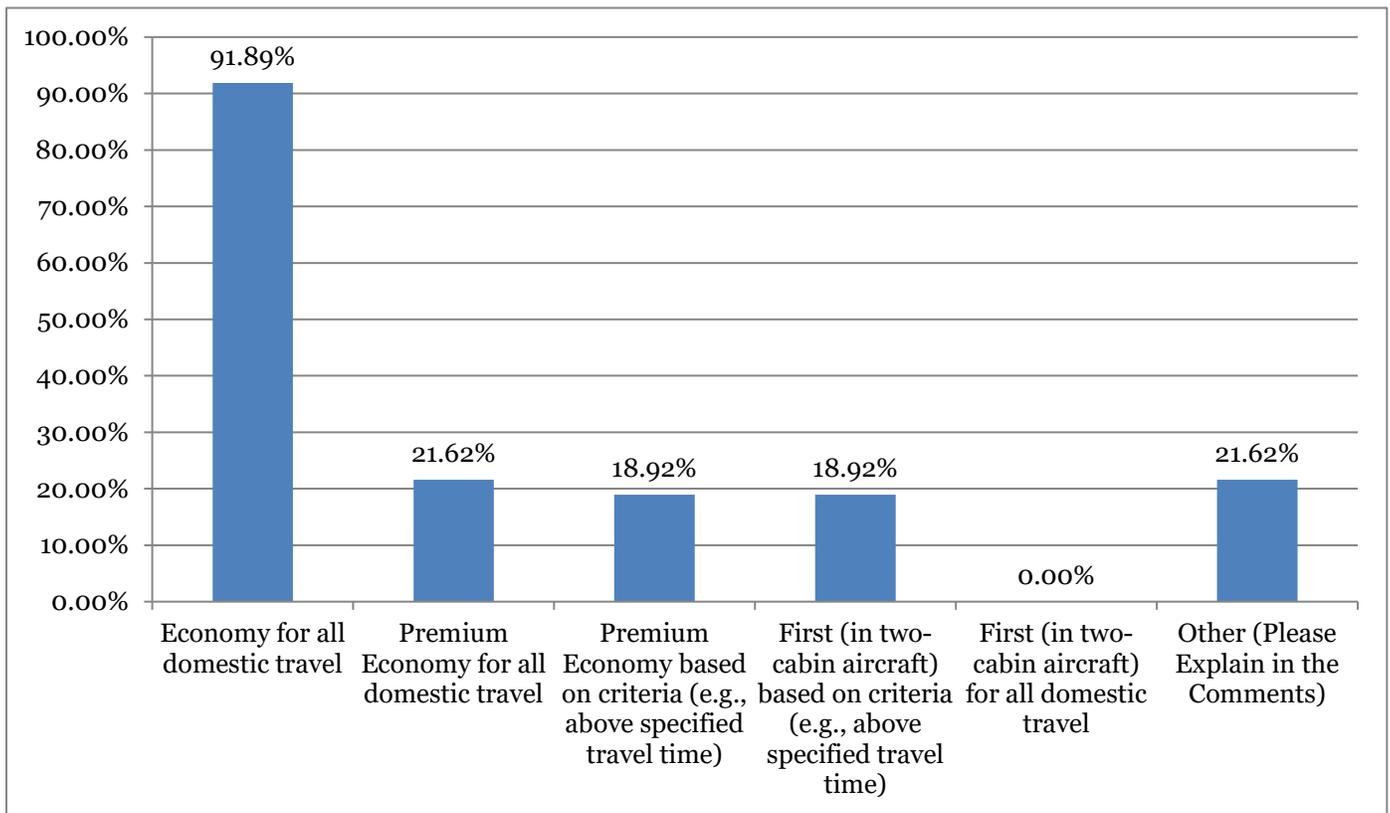
We have a separate policy which we attach to all HCP agreements. We also provide an overview of the



policy during the HCP onboarding.

- No separate HCP Travel Policy, HCP travel is managed consistent with employee travel requirements.
- We have a Travel & Expense Policy for Non-Employees (applies to non-HCP consultants as well).
- Part of our broader HCP Interactions Policy + a standalone HCP Travel Compensation Schedule.
- All HCP Travel is booked via our corporate office so we can control it.

6. What class of domestic (US) travel does your company allow for HCPs? [Please Select All That Apply]



Comments:

4 respondents noted 6-hour flight time threshold for travel above economy. Some additional details below:

- Non-consultant HCPs: Flights within the United States or outside the United States and less than 6 hours: economy or coach; Flights outside the United States and greater than 6 hours: business
Consultant HCPs: Business.
- If over 6 hours and/or beyond the continental US, then will allow Business Class.
- Business class permitted for travel segments longer than 6 hours one-way.



- Economy <6 hours, Business for >6 hours.

3 respondents noted 5-hour flight time threshold for travel above economy. Some additional details below:

- Generally Economy Class (which may include Economy Plus or Premium Economy) unless the flight includes at least one leg scheduled for 5 or more hours, in which case the next higher class of service may be booked for all segments of the round-trip flight. Domestic first class is permitted when it is the next higher class of service after economy.
- Coach/Economy class airfare is required, except if the duration of the flight is 5 hours or more, not including layovers or other ground time, or if the flight is an overnight “red eye” flight, then Business Class, is allowed but not First Class, airfare.
- We offer business class for domestic travel beyond 5 hours.

1 respondent noted 7-hour flight time threshold for travel above economy. Some additional details below:

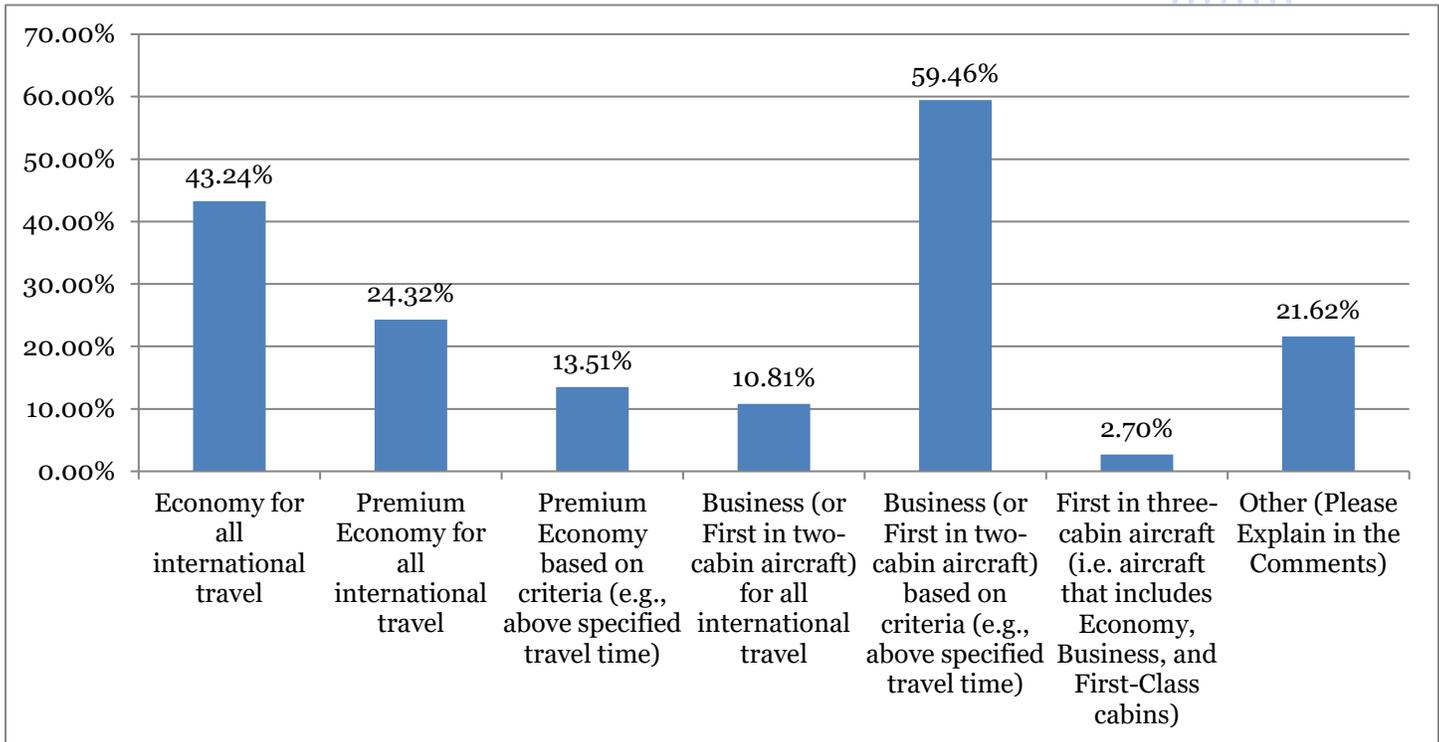
- For consultants/HCPs providing a bona fide service per contract, they are booked Economy if their longest flight segment is less than 7 hours. If 7 hours or more, then they are booked business class. For HCP attendees, they are booked Economy if the longest segment is less than 10 hours. If 10 hours or more, then they are booked business class.

Additional Comments:

- We do not allow first class travel domestically unless there is a specific request (e.g., red eye flight and the HCP has to work the following day).
- On an exception basis, mainly length of travel and/or physical reason where extra leg room is needed (e.g., recent surgery).
- The travel must be necessary and a cost-effective way to conduct the business meeting.



7. What class of international (OUS) travel does your company allow for HCPs? [Please Select All That Apply]



Comments:

5 respondents noted 6-hour flight time threshold for travel above economy. Some additional details below:

- Business class is permitted for flights greater than 6 hours of total published flight times between Europe and America (North and South) and, between Europe and Asia, between Europe and Africa, between Europe and Middle East. First class airfare is prohibited unless business class is not available for a flight for which business class would be permitted.
- Non-consultant HCPs: Flights within the United States or outside the United States and less than 6 hours: economy or coach; Flights outside the United States and greater than 6 hours: business
Consultant HCPs: Business
- Economy <6 hours, Business for >6 hours.
- Flight time must exceed 6 hours in order to book business class ticket.
- Business class permitted for travel segments longer than 6 hours one-way.

5 respondents noted 5-hour flight time threshold for travel above economy. Some additional details below:

- Generally Economy Class (which may include Economy Plus or Premium Economy) unless the flight includes at least one leg scheduled for 5 or more hours, in which case the next higher class of service may be booked for all segments of the round-trip flight. Domestic first class is permitted when it is the



next higher class of service after economy.

- Coach/Economy class airfare is required, except if the duration of the flight is 5 hours or more, not including layovers or other ground time, or if the flight is an overnight “red eye” flight, then Business Class, is allowed but not First Class, airfare.
- Premium Economy if greater than 5hrs. Business travel based on case-by-case review.
- Economy Class within Europe. Business class for International flights over 5 hours.
- Flight must be greater than 5 hours.

1 respondent noted 10-hour flight time threshold for travel above economy. Some additional details below:

- First class has to be approved by the CCO and Division President and is approved based on the travel time (i.e. flights over 10 hours) or other criteria.
- Business class can be booked for individual travel legs greater than 10 hours, with prior approval.

1 respondent noted 7-hour flight time threshold for travel above economy. Some additional details below:

- For consultants/HCPs providing a bona fide service per contract, they are booked Economy if their longest flight segment is less than 7 hours. If 7 hours or more, then they are booked business class. For HCP attendees, they are booked Economy if the longest segment is less than 10 hours. If 10 hours or more, then they are booked business class.

1 respondent noted 3-hour flight time threshold for travel above economy. Some additional details below:

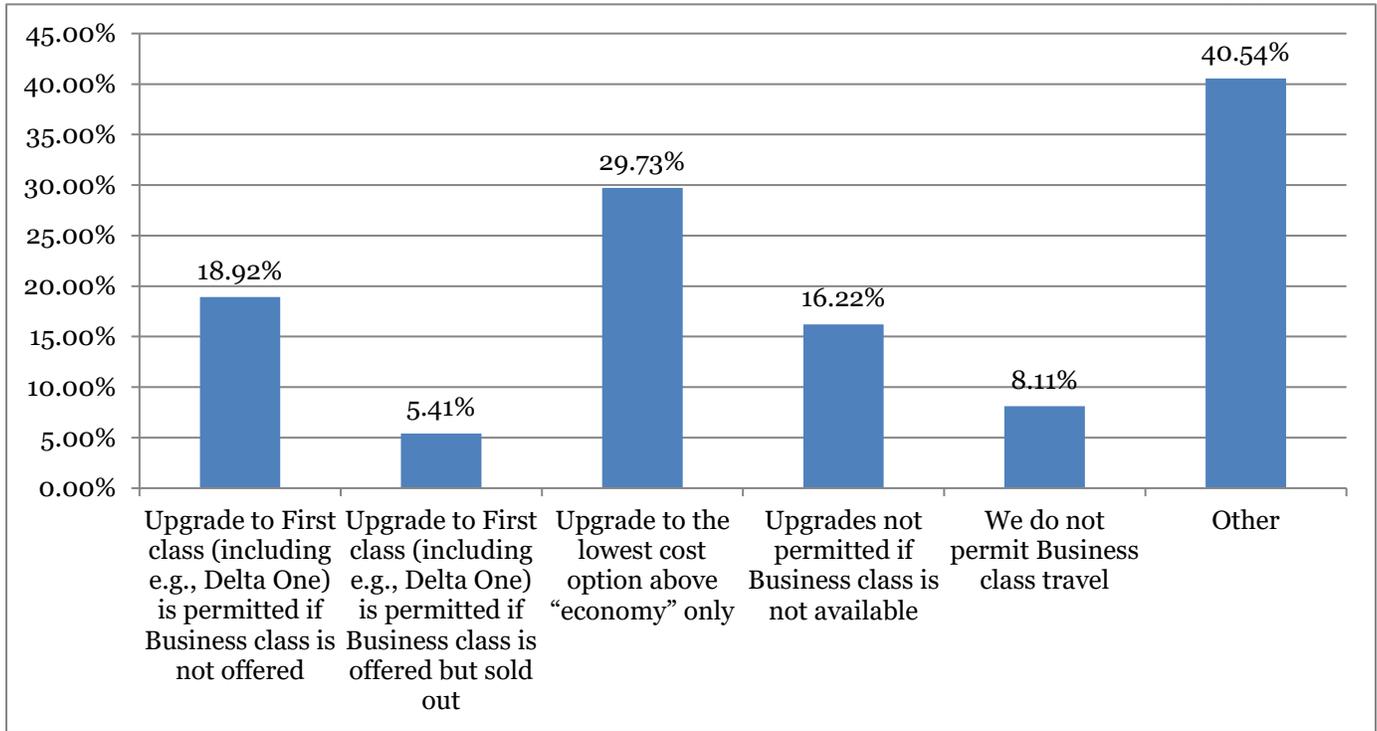
- Business class permitted for international flights greater than 3 hours and when required for medical reasons.

Additional Comments:

- We occasionally make exceptions to allow Business Class for Int'l travel with same day responsibilities.
- International travel is very infrequent for HCP consultants and speakers.
- We are only commercialized in U.S. and Canada.



8. If your company pays for HCPs to book Business class international travel under certain conditions (e.g., as noted in question 7 above), does your company permit any of the following when business class is not offered or available? [Please Select All That Apply]



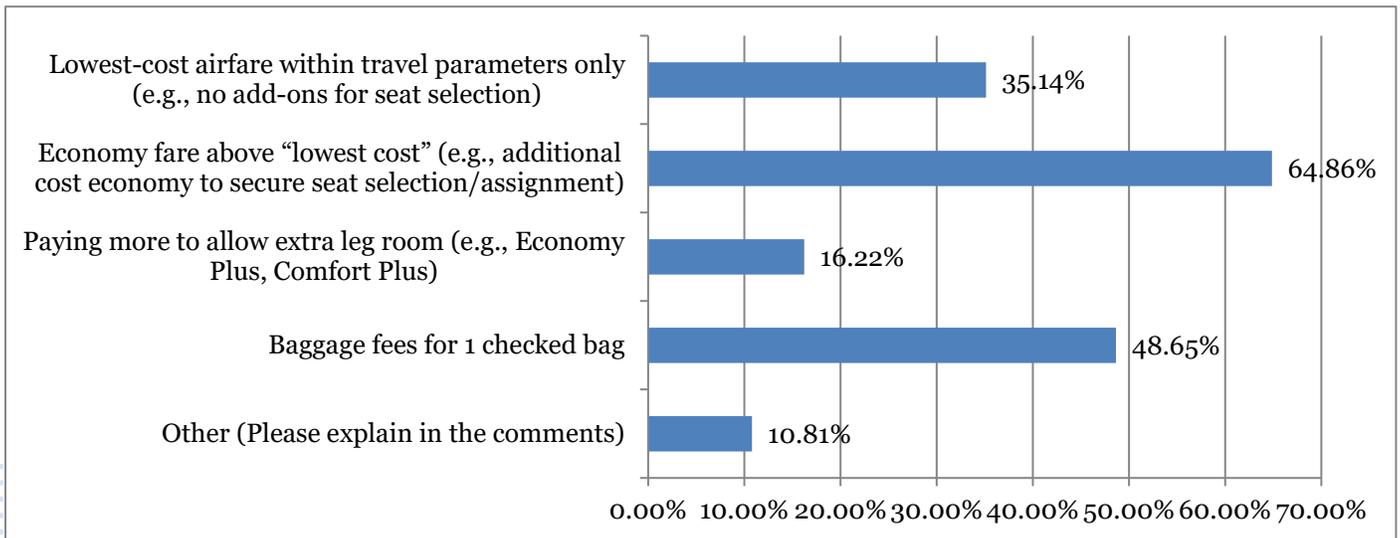
Comments:

- Red eye flights and international travel that is shorter than 5 continuous hours in length are reviewed on a case-by-case basis, dependent on the length of the trip and requirement for the red eye. Case-by-case situations are reviewed by Inari Medical Compliance Officer prior to booking.
- We only allow business class for flights 10 hours or more.
- First class airfare is prohibited unless business class is not available for a flight for which business class would be permitted. For example, some flights only offer First Class or Business Class. In this scenario First Class is considered equivalent to Business Class.
- In the rare instance that Business Class is not available (example on a connecting flight segment in a two-class plane of an International Business Class flight) First Class ticketing is permitted as long as it is not an extra cost.
- If Business class is not available, upgrade to First class is not offered. However, if there is premium economy available, that would be offered.
- On all HCP travel, the following are not permissible: Upgrades Reimbursement in lieu of purchasing a ticket; Costs associated with charter flights or private planes.



- Upgrades are permitted but are at the sole expense of the HCP traveler and must be paid using the HCP's personal credit card.
- Our policy prohibits first-class airfare. We consider Delta One for long-haul international flights to be business class.
- We would assess on an exceptional and case by case basis. No specific rule is in place
- International first class and suites are strictly prohibited.
- We book all travel and do not allow for upgrades.
- We don't allow HCPs to book their own travel.
- International first class is strictly prohibited.
- Rare scenario, case-by-case review.
- HCP can upgrade at their own cost.
- Haven't had this arise.
- N/A

9. Where airlines offer multiple levels of “economy” airfare, what does your company policy for US travel permit as standard for booking HCP flights? [Please Select All That Apply]



Comments:

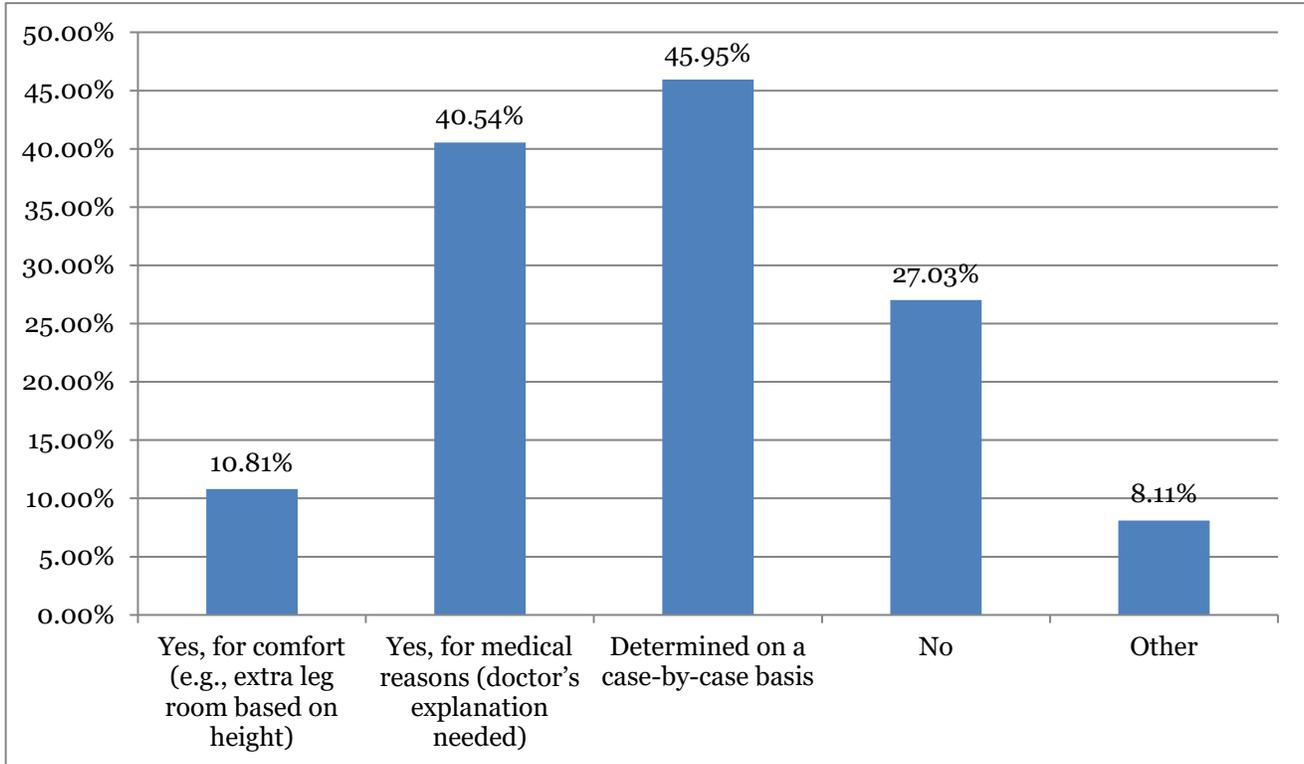
- Economy plus is allowed for flights that are 8 hours or more.
- Any upgrades are at the sole expense of the HCP traveler and must be paid using the HCP's personal



credit card or rewards they have with the airline. We also try to accommodate preferred airlines if the fare variation is nominal. We will allow for extra leg room, etc. if accompanied by a doctor's note from the HCP validating the medical reasons.

- Our HCP travel is typically one day or one overnight so we have never been asked to pay for baggage fees. We don't call that out one way or the other in our policy, but we would agree to pay baggage fees if necessary.
- We permit paying for seat assignment to reduce risk of travel delay (e.g., low-cost airlines) but not based on HCP's personal preference.
- Our policy permits Economy or Economy Plus airfare for US domestic travel.
- Economy Comfort Plus is allowable but not our standard offering.
- We generally allow HCPs to book premium economy airfare.
- We consider all "economy" options as allowable.
- They can pay for upgrades on their own.

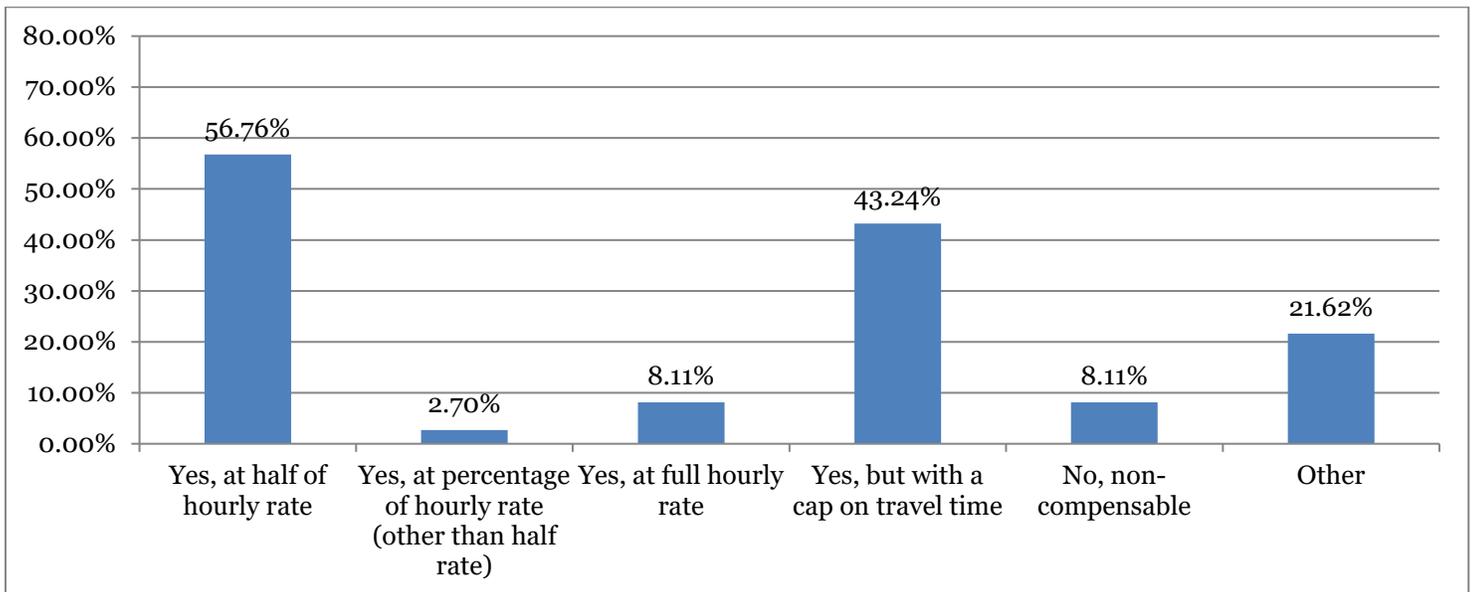
10. Does your company pay for HCPs to upgrade airfare for more space to accommodate needs or wants for comfort? [Please Select All That Apply]



Comments:

- Our policy permits Economy or Economy Plus airfare for US domestic travel.
- Any exceptions for medical reasons are reviewed for approval.
- Rationale reviewed through formal exception process.
- Generally, no unless there are special circumstances
- On an exception basis for medical reasons.
- Only if medical need is present.

11. Does your company compensate HCPs for travel time? [Please Select All That Apply]



Comments:

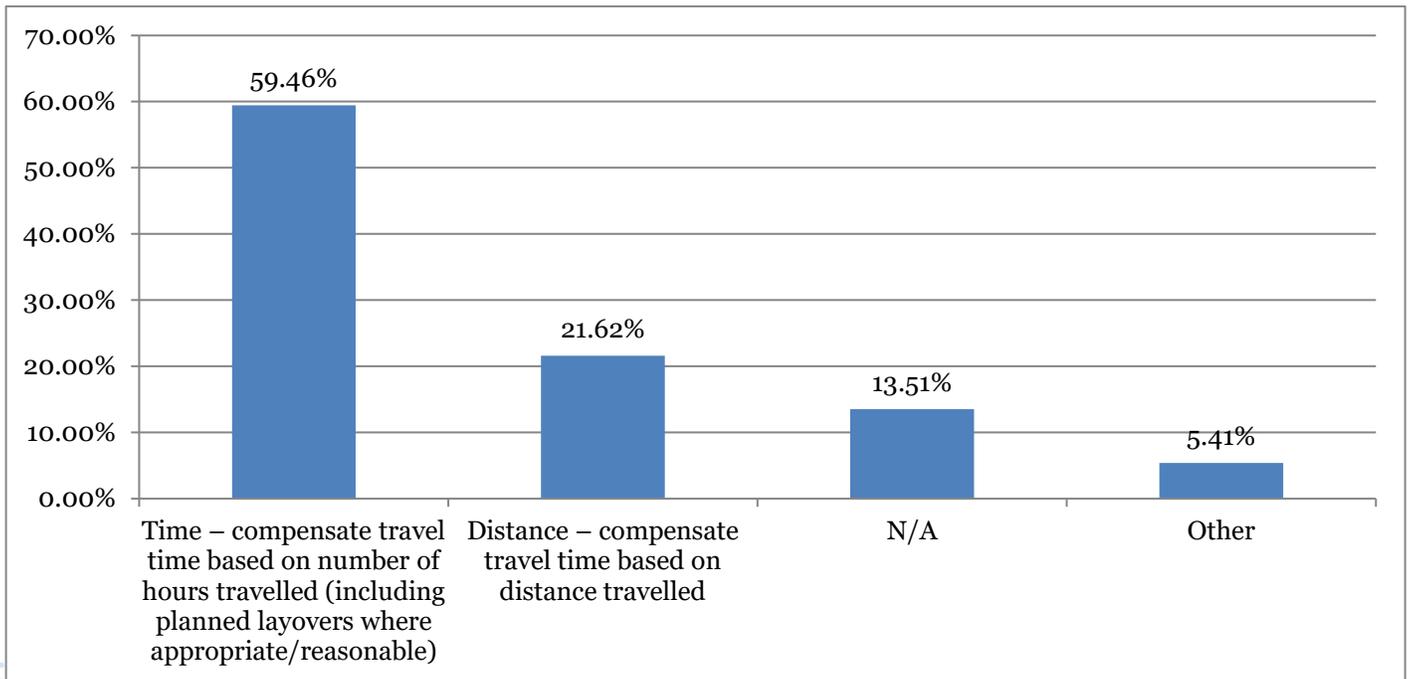
- We compensate their hourly rate based on total one-way mileage per the itinerary. Max hours paid would be 12 hours for anything over 7000 miles.
- We pay up to a maximum of 12 hours per approved event; rate and travel calculations in Professional Service Agreement.
- Travel time shall be compensated at 50% of the hourly FMV rate for services provided by an HCP Consultant. International travel is capped up to 24 hours for travel per each way of round-trip travel. Travel within the U.S. and Canada will be capped at 8 hours for travel per each way of round-trip travel.
- We do not proactively propose to reimburse HCP for the time spent for traveling; however, travel time can be considered in exceptional cases when the trip is long or requires long or several connections,



and an exception form must be filled out. Travel time compensation calculation is based on 50% of the travel time.

- While our agreements don't provide compensation for travel time, when we have a need that can't be filled without agreeing to compensate for travel time, we will negotiate this and provide for it in a request for services.
- Compensation for travel time is only permitted on an exception basis and only if requested/demanded by the HCP. If approved, travel is compensated at a significantly reduced rate.
- Modest increase to speaker fee if event > 100 miles from HCP, HCP advisory board members may receive hourly compensation for travel time upon request only.
- We pay flat rate for travel based on length of flights at a reduced hourly rate. The rates are determined by distance from physician's primary address to the event location.
- We compensate travel time based on travel to and from their home to the location they are presenting/speaking.
- For speaking engagements, a flat rate includes travel time.
- Compensation rate based on travel length.
- Travel time paid for consultants only.
- Exception basis only.

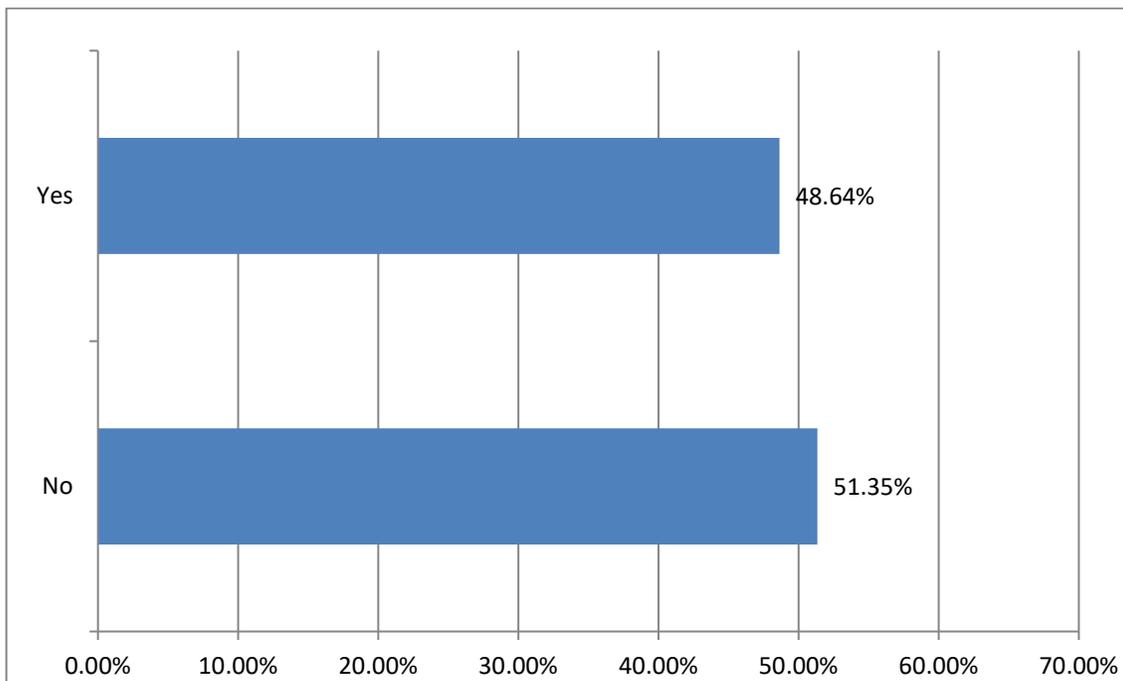
12. Does our company compensate travel time based on time or distance?



Comments:

- Actual travel time, up to a maximum of 12 hours per approved event; rate and travel calculations in Professional Service Agreement.
- We pay at half hourly rate for travel time but have caps based on hours travelled.
- Reimbursement at set mileage rate for local travel. Speakers and consultants are reimbursed for travel expenses but not additionally compensated.
- We've done both and are evaluating.
- For speaking engagements, a flat rate includes travel time.
- Compensate for time excluding layovers.

13. Does your company pay for HCP time spent for unplanned travel delays (i.e., delays no fault of the HCP)?



2023 & 2024 Comparison

Note: 13 additional respondents in 2024 compared to 2023 and several respondents commented that determination is made on a case-by-case basis. These factors could be contributing to the variations in responses year-to-year.

Unplanned Travel Reimbursement	2023 Respondents	2024 Respondents
Yes	62.50%	48.64%
No	37.50	51.35%



Comments:

Responded “Yes”:

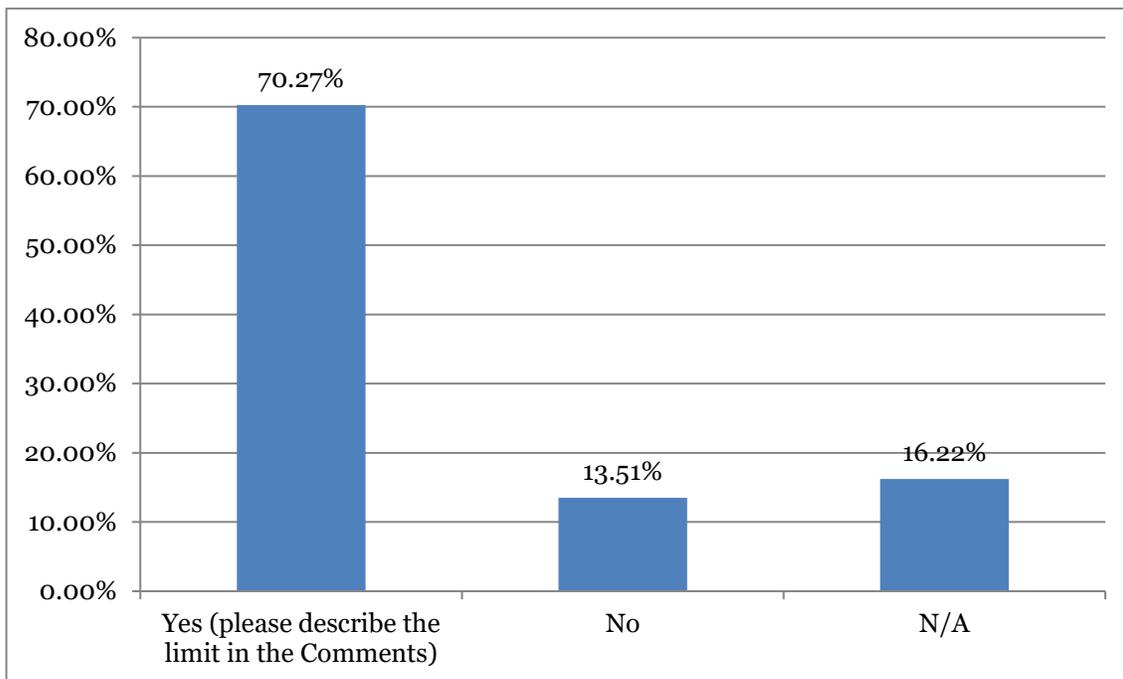
7 respondents noted the determination would be made on a case-by-case basis. Some additional details and comments below:

- Time spent in the airport due to delays may be compensated as long as it is within the travel time cap.
- Significant travel delays may result in additional compensation on a case-by-case basis.
- Rare but perhaps on a case-by-case basis
- Yes. Based on case-by-case review by Compliance.
- As an exception, with Compliance approval.
- If travel time is compensated.

Responded “No”:

- No, capped hours address the situation.
- This has not come up for us yet.

14. Does your company limit the number of hours of travel an HCP may be compensated for per day (e.g., time cap)?



2023 & 2024 Comparison

Time Cap	2023	2024
Yes	62.50%	70.27%
No	16.70%	13.51%
N/A	20.80%	16.22%

Comments:

7 respondents noted an 8-hour cap on travel time compensation. Some additional details below:

- Travel time is permitted up to 8 hours each way for domestic travel and twelve 12 hours each way for international travel.
- International travel is capped up to 24 hours for travel per each way of round-trip travel. Travel within the U.S. and Canada will be capped at 8 hours for travel per each way of round-trip travel.
- Caps are based on distance parameters with the total per trip maximum of 8 hours of compensation at 50% of FMV hourly rate for trips greater than 3000 miles.

3 respondents noted a 10-hour cap on travel time compensation. Some additional details below:

- Roundtrip: 10 hours domestic, 20 hours international.
- Limit of 10 hours of travel per day.
- 50% up to 10 hours.

2 respondents noted a 12-hour cap on travel time compensation. Some additional details below:

- Actual travel time, up to a maximum of 12 hours per approved event; rate and travel calculations in Professional Service Agreement.
- 12 hours max, including travel time on that day.

1 respondent noted a 4-hour cap on travel time compensation. Some additional details below:

- Standard limit is 4 hours per day maximum.

Additional Comments:

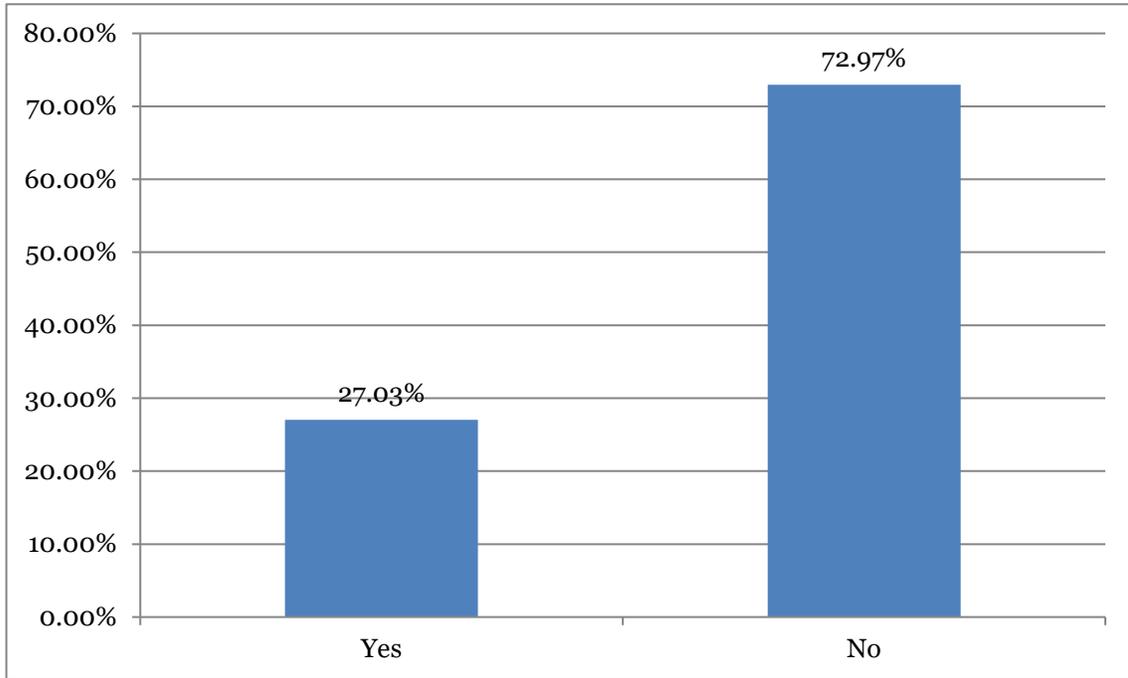
- Travel time shall be calculated each way, with a cap amount per 24-hour period.
- Max 10 hours inclusive of consulting services for day. 15 hours total domestic round trip. 30 intl.
- We have daily cap within a 24-hr period - this cap is applicable to both travel and consulting hours.
- Yes, we have time caps in place.
- Travel time compensation calculation is based on 50% of the travel time.
- Travel time compensation is not to exceed two times the total fees paid for the service.
- Capped at \$4000.
- The travel is paid per round trip to get to/from the destination of the activity where the HCP is executing services.
- We pay flat rate for travel based on length of flights at a reduced hourly rate. The rates are determined



by distance from physicians primary address to the event location.

- Time cap or predefined rate based on distance or time.
- Limited to average travel time between two distances.

15. Does your company compensate for local travel time to/from an HCP’s hotel to the meeting destination where applicable?

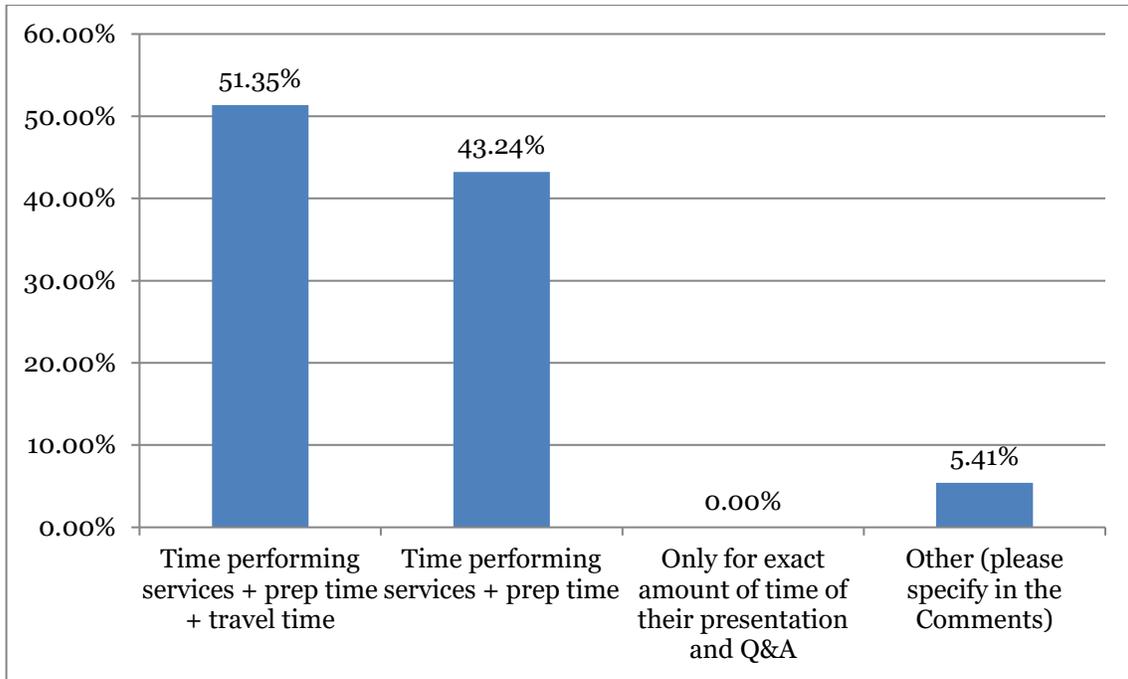


Comments:

- We pay flat rate for travel based on length of flights at a reduced hourly rate and reimburse the cost of local transport, but do not add additional travel reimbursement for time of local transport.
- Round trip mileage is reimbursable and will be paid at the current federal mileage reimbursement rate when the entire trip is made by personal vehicle.
- This depends on whether the consultant has exceeded the cap on travel hours.
- We compensate travel time for them to travel from their home to the event.



16. For physicians speaking or training at a company event (e.g. National Sales Meeting), how do you calculate the service time?



2023 & 2024 Comparison

Service Time	2023 Responses	2024 Responses
Time performing services +prep time + travel time	62.50%	51.35%
Time performing services + prep time	33.30%	43.24%
Only for exact amount of time of their presentation and Q&A	4.20%	0%
Other	0%	5.41%

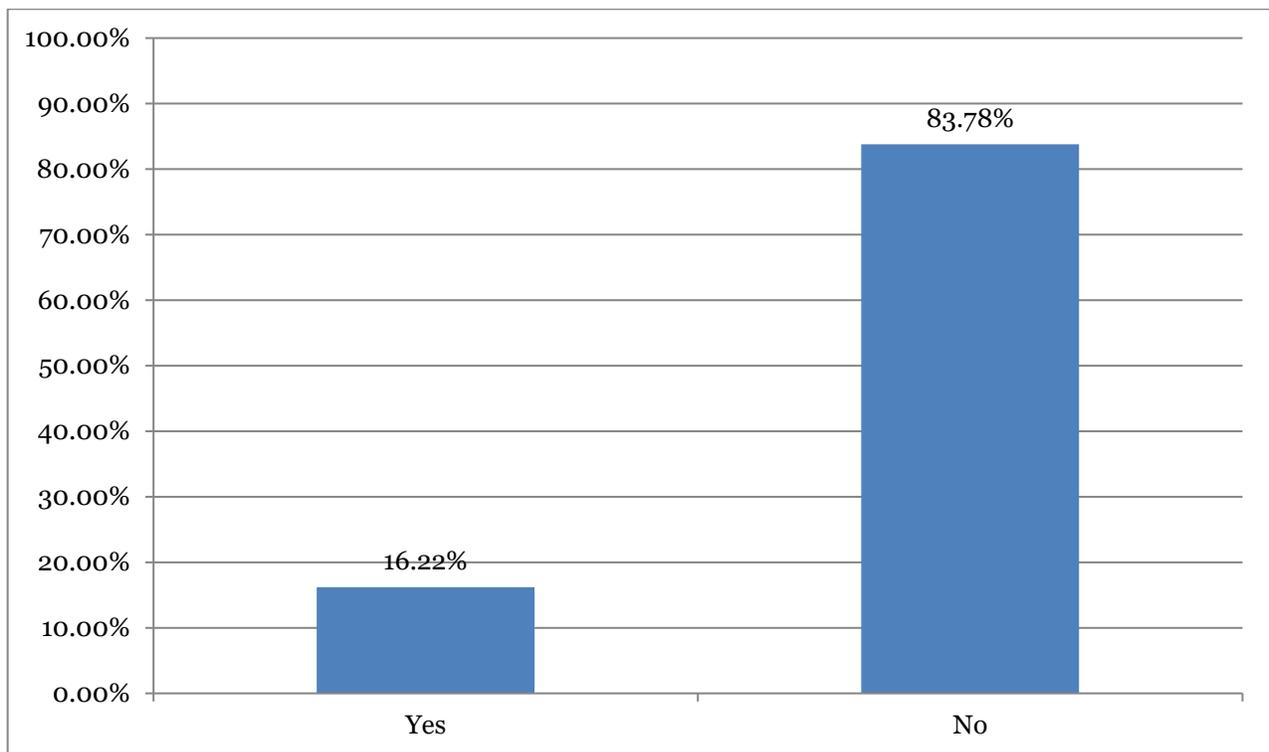
Comments:

- For NSM speakers we pay 8 hours all in, which covers speaking, time answering questions, time spent at meeting, prep, and travel time.
- We pay flat rate for travel based on length of flights at a reduced hourly rate and reimburse the cost of local transport, but do not add additional travel reimbursement for time of local transport.



- This time is discussed in advance, and we send a letter to the HCP noting the hours that were agreed upon for prep time, service time, and any travel time.
- For speaking engagement, a flat fee includes all service time.
- Time performing and working during the time they are there.
- Usually fixed amounts (quarter day, half day, full day).
- Travel time considered on a case-by-case basis.
- Travel time compensated on exception basis.

17. Does your company have a minimum time requirement for a physician speaking engagement in order to permit compensation and/or covering travel expenses?



2023 & 2024 Comparison

Minimum Time Requirement	2023 Responses	2024 Responses
Yes	8.30%%	16.22%
No	91.7%%	83.78%



Comments:

- Travel expenses are paid for if the HCP has to travel outside of their home location to the venue and this requires a hotel stay, mileage/flight/train, etc.
- Quarter day.

18. Does your company permit HCPs to submit unplanned service hours in addition to pre-planned service time where an HCP conducted unplanned business while traveling/attending a business meeting (e.g., hourly rate for unplanned business matter discussions during travel or other activities)? Please explain.

Responses:

24 respondents permit HCPs to submit unplanned service hours, including those permitting on a case-by-case basis, under specific circumstances, and/or allowing for exceptions. Some additional details are below:

- A separate SOW would generally be required from a company "requestor" that is subject to review and approval requirements.
- Yes, if there is documentation of the additional unplanned services provided and confirmed it was at the request of the company.
- Yes, but only if those unplanned service hours fall within the terms of the underlying services agreement.
- Unplanned services must be approved by business owner and included in the needs assessment.
- Yes and will reimburse if there is evidence to support the claim
- Permitted within scope of contract based on business need.
- On an exception basis with business need justification.
- If the time is legitimate and approved by the VP.
- Yes, with a legitimate business justification.
- On an exception basis.
- We do not allow for the submission of unplanned service hours. Unless approved by our professional education team.
- Only if our company asked the HCP to perform service hours that were not pre-planned. Prior approval is required.
- Any unplanned business matters need to be addressed in an amendment to the contract to allow for payment.
- Generally no, but we would compensate for legitimate services at the company's request. Any services must be approved in advanced through needs-assessment process.
- Yes. Based on case-by-case review by Compliance.
- This is not generally allowed but may be reviewed on a case-by-case basis for an exception.



- No. if this happens, we review on a case-by-case basis.
- Normally no, but it depends on a case-by-case basis.
- If the HCP has unplanned service hours, they have to submit a request for those hours as we provide them with a letter summarizing the agreed upon hours. Any hours above the agreed upon hours requires approval.
- This is generally not allowed. Any exception to this rule would be subject to an exceptions review process with approvers from Compliance and Legal. Allowed to submit but reviewed and approved on a limited case by case basis.
- This would be considered on a case-by-case basis depending on the circumstances.
- Case-by-case determination.
- Yes.

13 respondents do not permit HCPs to submit unplanned service hours. Some additional details are below:

- No, we inform HCPs what we will pay for prep and service time ahead of the event. Exceptions are rare and considered on a case-by-case basis by Compliance.
- No, all services are agreed upon in advance and align with the fixed fees associated with the service.
- No. Engagement Orders must be generated prior to services being provided.
- No. All HCP consulting time must be initiated by the company - pre-planned.
- No, rates are agreed upon at the time of contract signing.
- No, it is already being paid for the time they are there.
- No. The service must be planned.
- No.

19. What, if anything, would be reimbursable for HCP travel and time if a scheduled course had an urgent cancelation? Please Explain.

Responses: Responses noted reasonable reimbursable costs including: service hours, travel time, and/or travel expenses actually incurred reimbursable; reimbursable if course cancelled within certain time period; case-by-case determination; exceptions basis.

Reasonable Reimbursable Costs:

- Reasonable costs incurred by the HCP and not subject to refunds, that are in line with company policy, may include: Travel Expenses (flights, train tickets, car rentals, and mileage for personal vehicle), Accommodation Cost, reimbursement for meals purchased during the travel period as well as travel time compensation. All reimbursements are subject to the submission of appropriate documentation and receipts.
- HCPs are paid for service hours only. If the event is cancelled, there is no reimbursement for the time the HCP would have spent at the event. All HCP travel is booked and paid for directly by the company through approved travel agencies. If the event is cancelled, the company deals directly with the travel agency and airlines/hotels.
- If an event was cancelled, we would pay for the time an HCP spent preparing for it and any travel time



actually incurred (if, for example, the HCP traveled to the event before it was cancelled). We would not pay for travel or service time that was not actually incurred.

- If the HCP actually traveled, we would reimburse the travel and time. We book all travel from corporate so if the HCP hasn't yet traveled, then we hold onto the ticket to "re-use" it and they are not compensated anything.
- We pay for the HCPs prep time and if they traveled to the location and it was cancelled; we would cover their travel time. In some cases, we have compensated for the planned service hours if the cancellation was our fault.
- If the HCP doesn't begin travel (e.g., in the event of a cancellation), no travel compensation is paid. They may be compensated for prep work done in advance of the activity before the cancellation was announced.
- We would not cover the HCP's additional expenses not already agreed upon and/or booked if the urgent cancellation was due to the HCP consultant his-/herself.
- We don't pay for service that is not provided. If the HCP traveled until the location and it was cancelled and it was not his/her fault, we would pay, as he/she was available.
- If cancelled by course company, then yes we would reimburse. If cancelled by HCP without notice, we would not reimburse. Reviewed on a case-by-case basis.
- We require all travel be planned by our company to prevent unreimbursed cancelled travel. We would not cover anything an HCP scheduled themselves.
- If the HCP had already traveled, we would likely still cover this travel time and would cover any prep time incurred.
- The company would have booked the travel so there should be no need to reimburse for travel expenses.
- We have set parameters that are followed regarding any payments due to cancellations by the Company.
- If the course cancelled, then we would cover the expenses and any prep associated with the event.
- Not in Policy, but based on Company cancelling, we might be liable for reimbursing expenses.
- We would reimburse any preparation time and any expenses incurred prior to cancellation.
- We would compensate for actual time spent preparing or traveling if the company cancelled an event.
- Prep time and any other services performed. We don't have guarantees.
- We would compensate the HCP for travel and prep time for this event.
- All associated travel costs if we cancel the event/engagement.
- Time and cost to rebook and return home.
- Preparation time, travel time.
- Meals incurred.

Cancellations Within Certain Time Period:

- If cancelled within 7 days or less before the event, we can consider paying a percentage of the fee - subject to specific escalation matrix. We do not reimburse travel for cancelled events. We can reimburse prep time if the work has demonstrably been completed.

If company cancels within 5 business days we would compensate the HCP. If the HCP cancels then



there is no compensation.

- If we notify them within 72 hours.
- 72 hours.

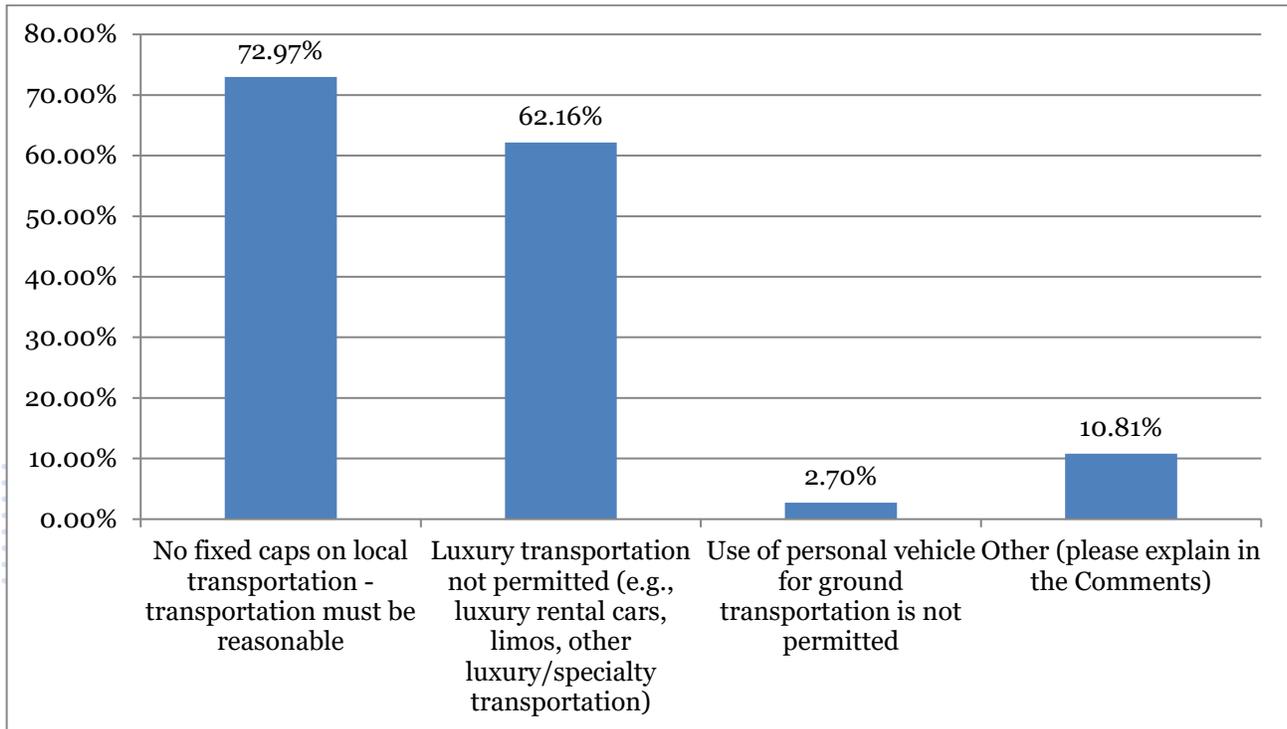
Case-by-Case Basis:

- This would be looked at on a case-by-case basis by looking at such things as the reason for the cancellation, who canceled, and work completed prior to the activity.
- We would handle on a case-by-case basis, for example if they were already enroute we would probably pay for that time, etc.
- This would be considered on a case-by-case basis depending on the circumstances.
- If cancelled by course company, then yes we would reimburse. If cancelled by HCP without notice, we would not reimburse. Reviewed on a case-by-case basis.
- Yes. Based on case-by-case review by Compliance.
- Yes, handled on a case-by-case situation.
- Case-by-case inquiry regarding how long in advance the cancellation occurred.
- We would negotiate.

Exception Basis:

- Prep time and cancellation fee on an exception basis.
-

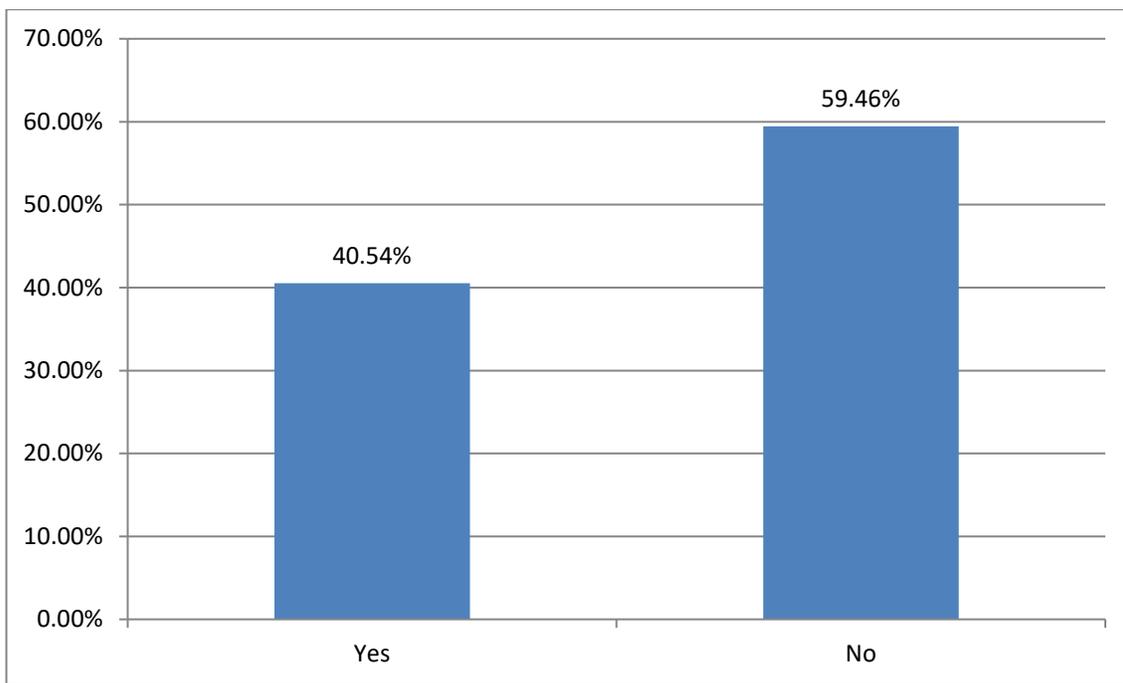
20. If your company covers local transportation, does your policy set specific parameters for local transportation? [Please Select All That Apply]



Comments:

- Personal Car: Destinations greater than 120 miles one-way require Professional Education Department Approval. Round trip mileage is reimbursable and will be paid at the current federal mileage reimbursement rate when the entire trip is made by personal vehicle. Fuel costs are included in the per mileage reimbursement rate. Tolls and parking receipts are required for reimbursement. Moving violations and parking tickets will not be reimbursed.
- Transportation to/from events is only permitted for the HCP faculty speaking/consulting at the event. HCP attendees do not get local transportation paid for or reimbursed.
- Generally, don't pay for it; occasionally reimburse mileage and parking.
- Ground transportation must not be perceived to be overly luxurious.
- Mileage rates paid according to IRS.
- We reimburse travel over 25 miles.
-

21. Does your company allow HCPs to book travel directly, then expense to the company?



Comments:

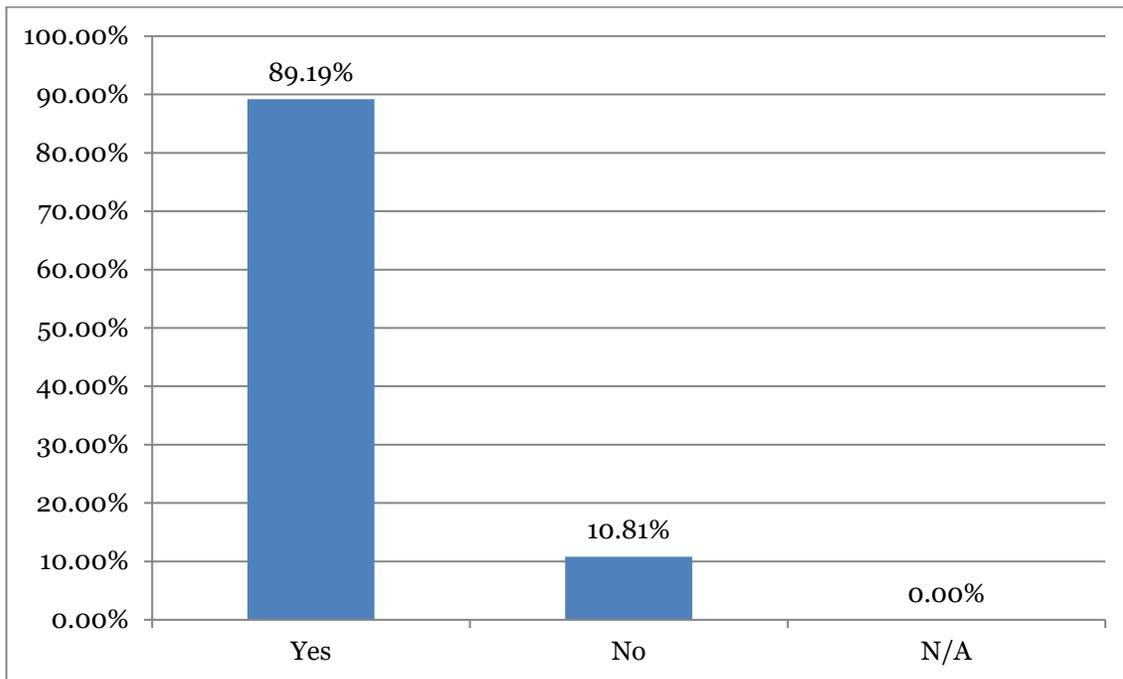
- All approved travel and accommodations for HCPs and Public Officials, except for most ground transportation, must be arranged for by team members responsible for event management or other team members assigned to arrange HCP travel.
- All HCP travel is booked and paid for directly by the company through approved travel agencies that are familiar with our policy requirements.
- Use Company's preferred travel management company for HCP/GO travel (air, hotel and ground



transportation) where available and applicable.

- Usually, travel is booked through a third-party meeting organizer, but there are rare exceptions where any HCP might book their own travel.
- Employees are supposed to book travel on behalf of the HCP; we have allowed for exceptions in certain circumstances.
- HCPs must obtain approval for the flight prior to booking. Approval is provided based on the HCP Travel Policy.
- An exception process if there is a physician request is present.
- On exceptional basis only.
- Case-by-case basis.

22. Does your company utilize the IRS method for reimbursement (i.e., maintenance, gas, miles) if an HCP is driving their personal vehicle to/from a speaking engagement?



2023 & 2024 Comparison

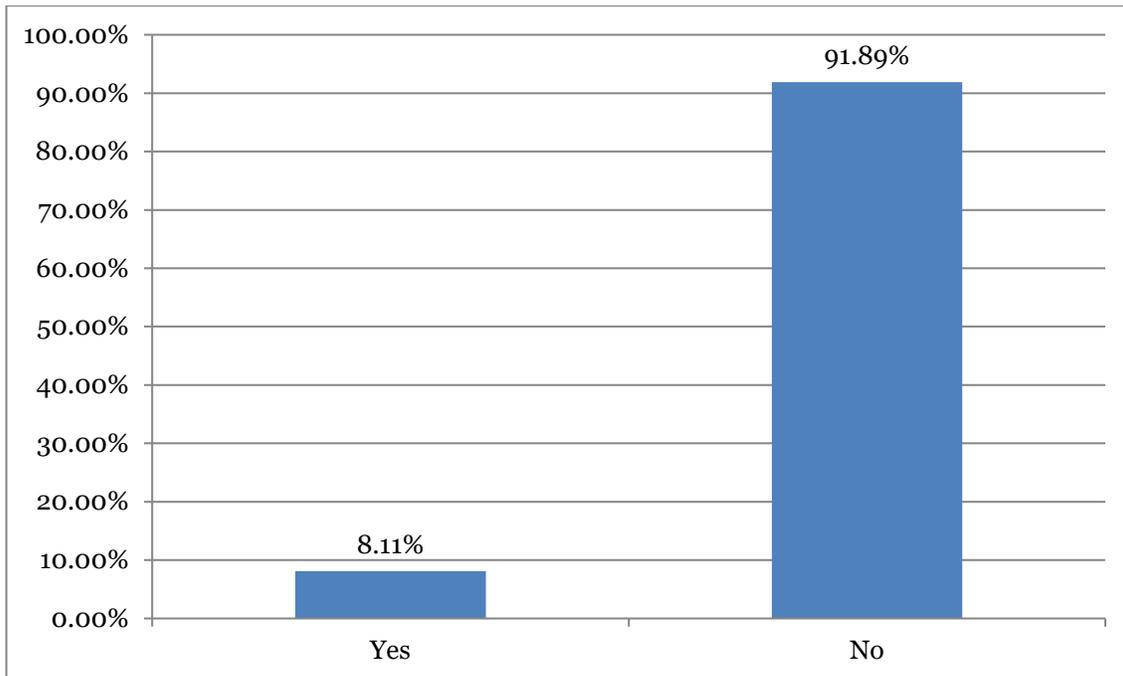
Utilization of IRS Method	2023 Responses	2024 Responses
Yes	87.50%	89.16%
No	12.5%	10.81%
N/A	0%	0%



Comments:

- Personal automobiles used to travel are eligible for mileage reimbursement based on the rate approved by Finance for the country where such travel takes place.
- We just pay 50% FMV rate based on distance to travel in lieu of mileage and gas.
- We use their mileage rate for mileage reimbursement.
- Set rate per mile x miles traveled.
-

23. If an HCP will be traveling with a spouse or guest, do you allow company to assist with booking companion travel, so long as company does not pay for companion travel expenses?



2023 & 2024 Comparison

Assistance of Companion Travel	2023 Responses	2024 Responses
Yes	8.30%	8.11%
No	91.70%	91.89%

Comments:

- Our company does not provide any assistance with HCP spouse/guest travel. HCPs who work directly with company approved travel agencies for spouse/guest travel must pay all booking and processing fees charged by the travel agency.

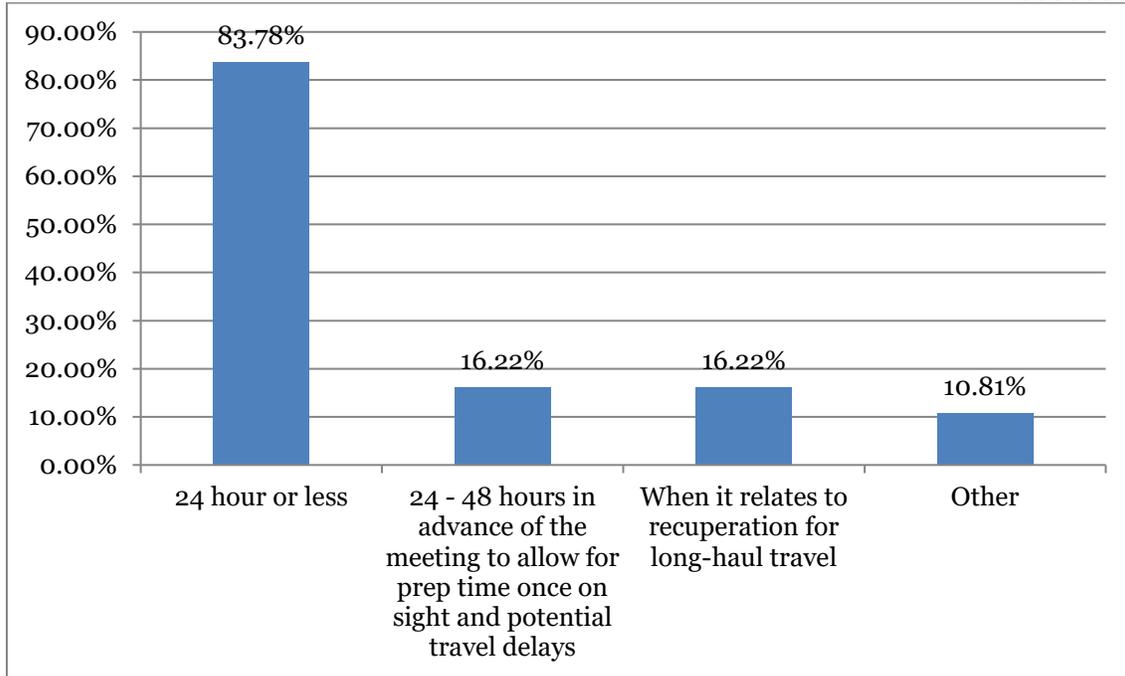
We strongly discourage any spouse or guest to travel with HCP consultant. We do not assist with



booking companion travel.

- We allow this only for HCP consultants/faculty.
-

24. How far in advance of or immediately following the business purpose of the meeting does your company permit arrival or departure? [Please Select All That Apply and Explain in the Comments]



Comments:

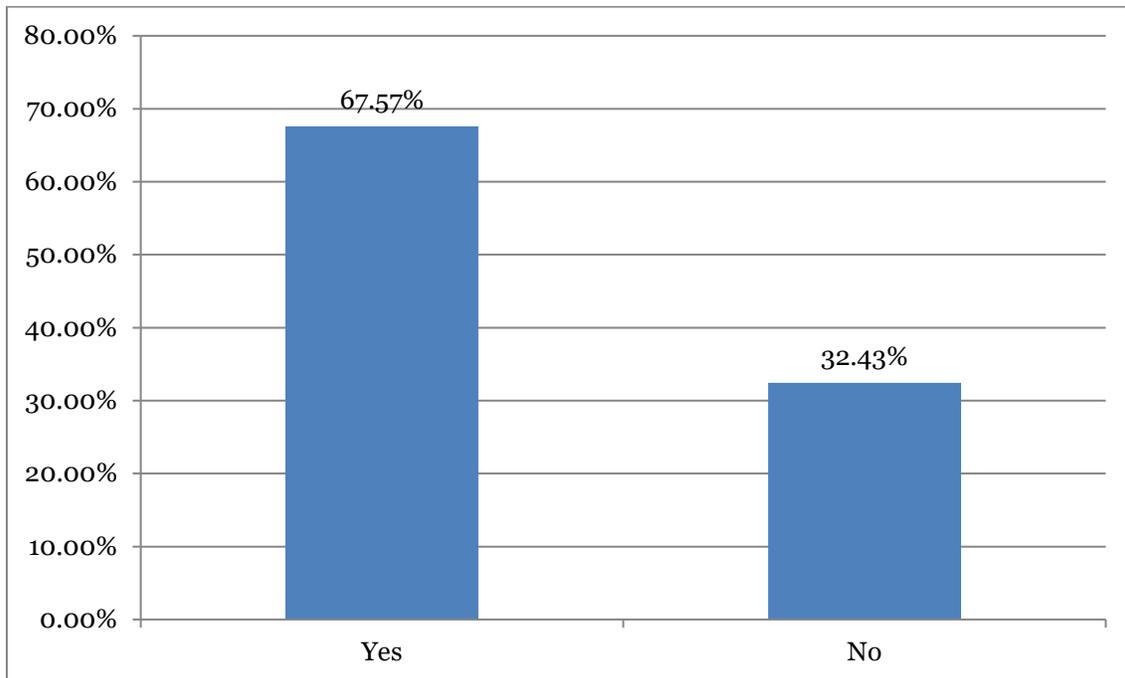
- Generally, domestic trips cannot arrive earlier than the night before the meeting starts. An additional night is permitted for long-haul travel. HCPs are expected to depart after their service has concluded, but if they cannot arrive back to their trip's origin by 11 pm for domestic travel, then we allow departure the next day.
- Our policy requires travel and lodging to be limited and confined to the locations, dates and times of the company activity. Our policy does not specifically require arrival/departure within a specific timeframe but 24 hours would be the max that is permitted.
- No specific timeframe mentioned but travel and accommodation offered to HCPs and/or Public Officials must be tailored to the duration of the event they are participating in. This would usually imply 24hours or less.
- There are some cases where its greater than 24 hours but very rare.
- If applicable, we may allow an additional day before the meeting for HCP faculty traveling internationally.
- Will allow for arrival the day before or departure the day after due to start and end times of events.
- Depending on the location of the HCP they may need more time to travel to our event. We don't normally exceed the 48 hours unless there are travel issues like a strike that may affect the availability



of flights.

- 48 Hours for International.
- It depends on whether the activity starts in the morning and how late in the day it ends; Travel arrangement must be limited in duration to the closest in time to the Company program or meeting for which the HCP is traveling.
- Travel arrival and departure times must be closest in time to the date and time of the event or meeting.
- We ask that they book as close to the beginning/end of the engagement as possible.
- Also depends on flight arrival times and when our activity begins.

25. Does your company policy have limits in connection with bookend travel (e.g., a return flight to a destination other than the HCP’s originating airport)?



2023 & 2024 Comparison

Limitation of Bookend Travel	2023 Responses	2024 Responses
Yes	66.70%	67.57%
No	33.30%	32.43%

Comments:

- We do not call this out in our written policy. This requires approval from Chief Compliance Officer. In rare exceptions we allow it and if there is a legitimate reason, but the HCP has to pay the difference in

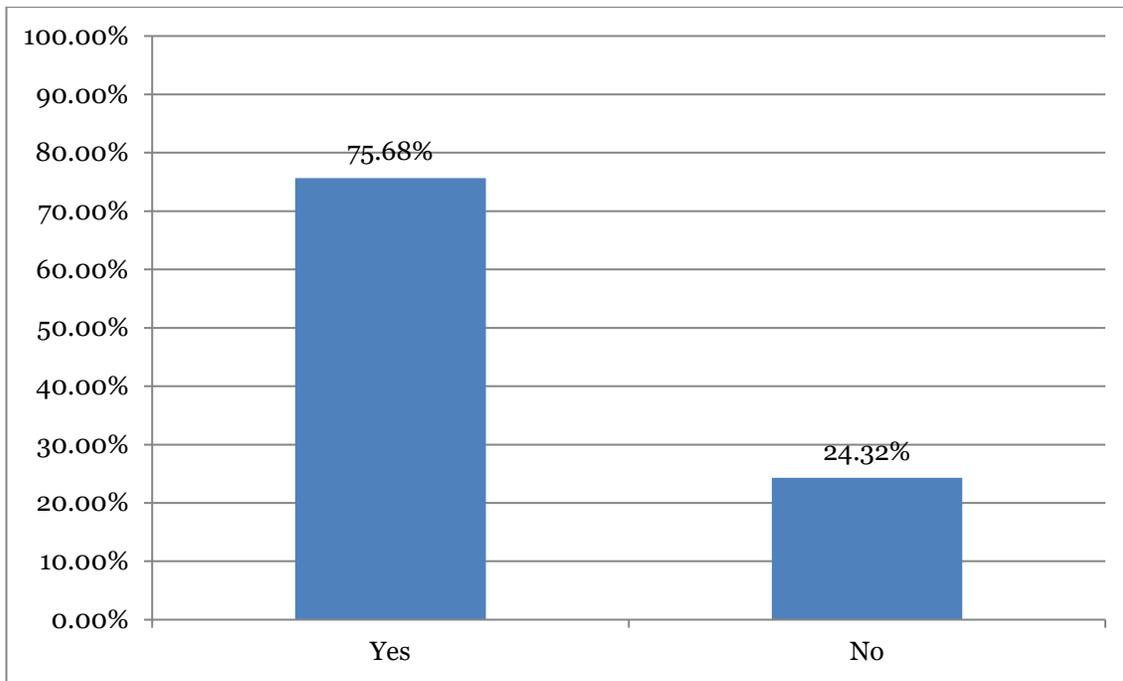


airfare, and we only pay the travel time hours that would have applied if the HCP had returned to their home airport.

- Our policy permits departure/return flights to a different destination under clearly defined circumstances outlined in detailed FAQs.
- Managed consistent with rules for company employees. Requires approval and Company can incur no additional charges.
- We provide flights to and from our events. We will not cover flights for personal travel or other business events outside of ours.
- We would allow for this, but the HCP would be responsible for paying the difference between the two flights if it is significant.
- We generally do not allow/pay for bookend travel except in very rare circumstances with Compliance approval.
- Company will not pay any additional costs resulting from an HCP's personal travel deviation.
- Only round-trip tickets will be permitted (to and from same airport).
- HCP needs to pay the difference, if comparison shows difference.
- Although travel doesn't have to be to and from the same location – any request would be reviewed on a case-by-case basis.
- We would evaluate the request on a case-by-case basis. If the alternate destination creates an increase in price, the HCP would be responsible for the difference.
- Would need an explanation of the change in destination and if it would be appropriate to cover.
- Not permitted without Compliance's approval.
- Considered on a case-by-case basis.
- Case-by-case basis.
-



26. Does your company policy have limits in connection with extended stays unrelated to the business purpose for HCP travel?



2023 & 2024 Comparison

Limits on Unrelated Extended Stays	2023 Responses	2024 Responses
Yes	83.30%	75.68%
No	16.70%	24.32%

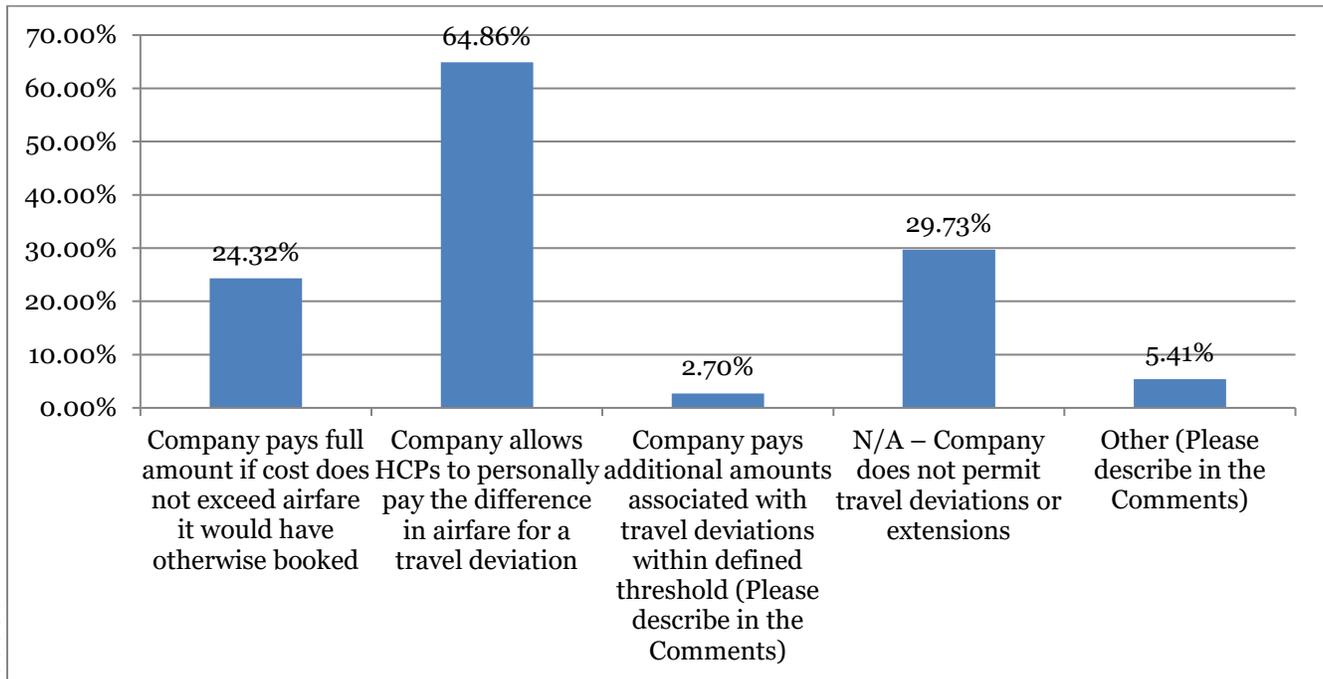
Comments:

- Our policy expressly prohibits extra days of travel or lodging for non-business purposes. If the HCP wants to extend a trip, he/she must work directly with the travel agency, airline or hotel and pay all associated rebooking/change fees.
- Extended stay is at the HCP's expense. However, we will extend the date of the return flight (departing and arrival at the same locations) provided it is requested well in advance.
- Managed consistent with rules for company employees. Requires approval and Company can incur no additional charges.
- We may not directly arrange for or incur additional costs related to changes, or extensions for personal reasons.
- We would allow for this, but the HCP would be responsible for paying the difference between the two flights if it is significant.
- If the HCP requests to extend their stay, they are required to cover the additional hotel costs, difference in flight, etc.



- The extension cannot exceed the length of the business trip (based on nights of the meeting, not hours).
- Company will not pay any additional costs resulting from an HCP’s personal travel extension.
- No extended stays unrelated to the business purpose are allowed/will be paid for.
- HCP must cover any non-business-related expenses.
- Extended stays are the HCP’s responsibility.
- Covered by HCP.
- No limits but this should not be the norm - infrequently is the rule of thumb.
- Not a written policy but our practice is that this is highly discouraged and if approved to extend the stay it is at the HCP cost and any difference in airfare is paid by the HCP.
- We do not allow extended stays.
- Not permitted.
- Not allowed.

27. If your company permits HCPs to book personal travel deviations (e.g., departure from city other than home airport) or extensions (e.g., personal travel before or after a business meeting), which of the below apply? [Please Select All That Apply]



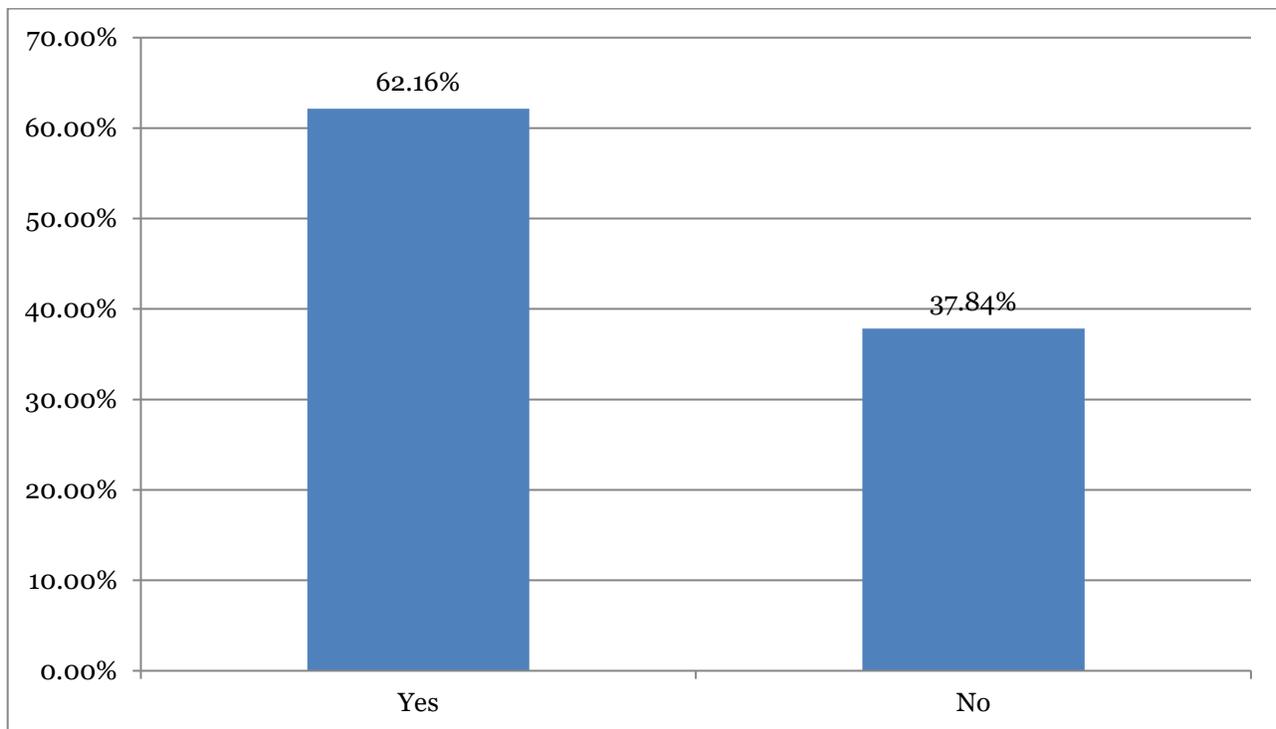
Comments:

- Any travel deviations must be handled by the HCP directly with the travel agency, airline, or hotel and pay all associated rebooking/change fees.



- Threshold is with \$75 of original airfare cost - if it is above, the HCP would be responsible for the cost.
- Travel deviations related to personal travel would only be considered for HCP consultants/faculty.
- Company will book only one-way flight.
- Deviations from travel schedule need to be approved by Compliance.
- Depends on circumstances what we cover for exceptions. Policy is that we don't allow.
- Deviations and extensions are not permitted to accommodate personal travel.
- Personal travel deviations are generally not permitted.

28. Does your company pay for HCP travel arrangements when travel is for purposes of marketing activities? If yes, please explain under what circumstances in the Comments.



Comments:

- (1) To attend a Product demonstration at the Company facility or a centralized location such as a reference site, if there is an objective, legitimate reason that supports the HCP's in-person attendance, and (2) to attend a plant tour, if there is an objective, legitimate reason to show HCPs how the Company makes Products, the Company's quality control systems, or other aspects of Company's manufacturing and repair processes through a plant tour.
- Our policy allows HCP travel for legitimate and bona fide business reasons for HCPs who need to attend the business meeting justifying the travel.
- Not pure marketing. Company will pay for attendance at educational events that may include a minimal level of product.

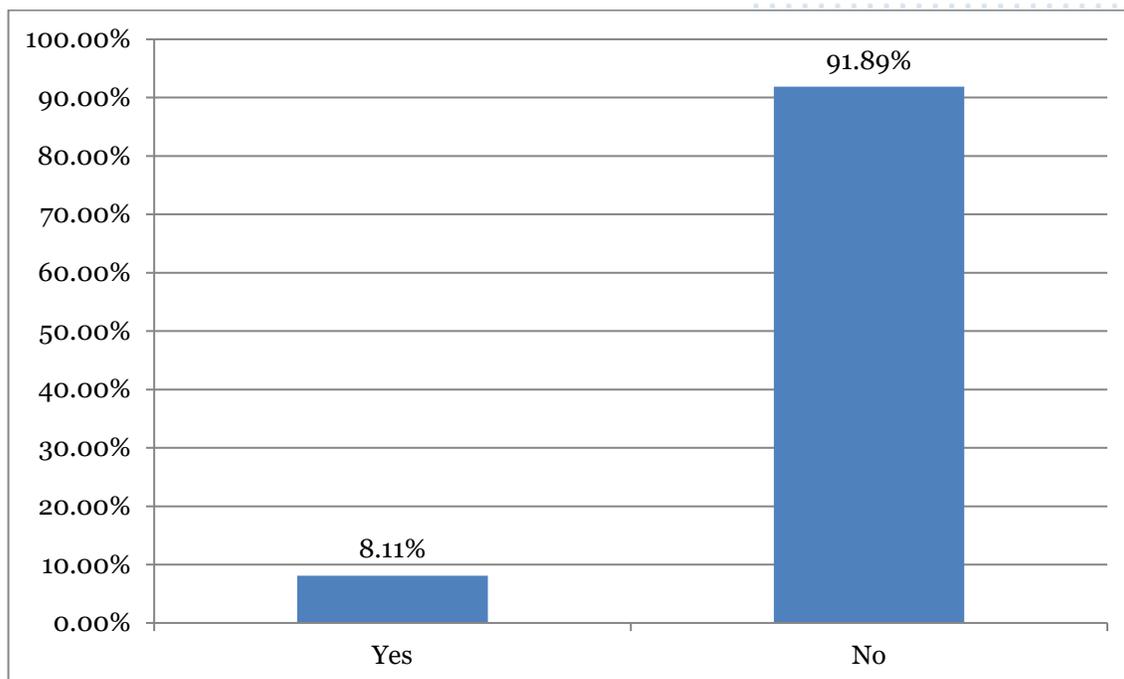


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- If we are asking an HCP to travel to a conference, advisory board, etc., our marketing team handles all HCP consultant engagements.
- This may indirectly occur related to travel to film educational videos that may also be used for marketing purposes.
- Only when the program agenda is for the purpose of scientific exchange or a "users meeting" or future product positioning.
- Payments or reimbursement for travel is permitted for company-conducted programs and meetings.
- Show site visits, commercial sales meetings for training purposes, speaker for speaking engagement.
- In limited circumstances such as manufacturing site tours, demonstration of capital equipment.
- HCP consultant-related travel payments for marketing-driven engagements are permissible.
- We pay for HCP travel for marketing events when HCP has a consulting agreement.
- We provide travel arrangements if part of a speaking engagement.
- Only HCP under consulting arrangements, not attendees.
- Peer-to-peer training events, conference activities.
- If it is related to legitimate consulting services.
- Not for travel time, just services and expenses.
- Same rules apply for marketing activities.
- Talk about products to other HCPs.
- Speaker events, sales meetings, etc.
- Example: tradeshow, ad board.
- This has not come up for us yet.
- Yes, for consultants.
- We don't allow HCPs to book their own travel.



29. Does your company permit for HCP travel on the company’s private aircraft? If yes, please explain in the Comments under what circumstances.



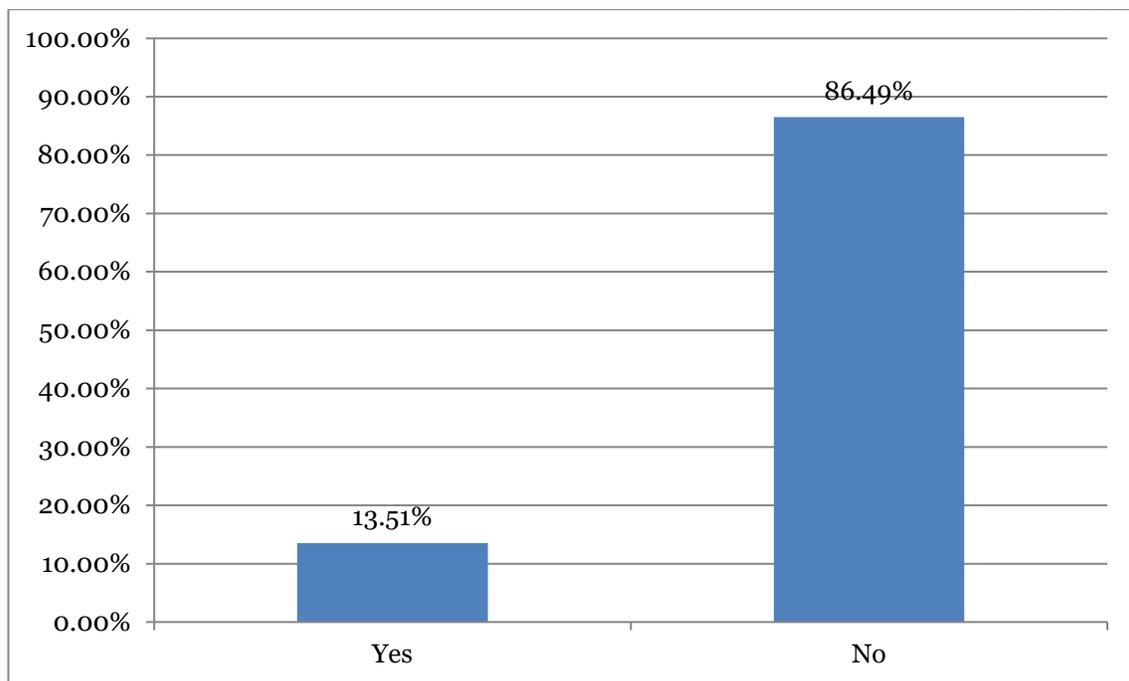
Comments:

6 respondents noted that they do not have a company aircraft or this question is not applicable.

- This is only permitted in very limited circumstances, considering the cost of the commercial flight and travel time.
- Subject to approval from Compliance.
- Written justification and executive VP approval.
- Our policy requires travel and lodging to be modest and reasonable and prohibits luxury travel.
- Never had this come up.



30. Does your company compensate HCPs for expenses if they fly on the HCP's own private aircraft? If yes, please explain in the comments what is compensated (e.g., fuel, cost of comparable commercial flight).

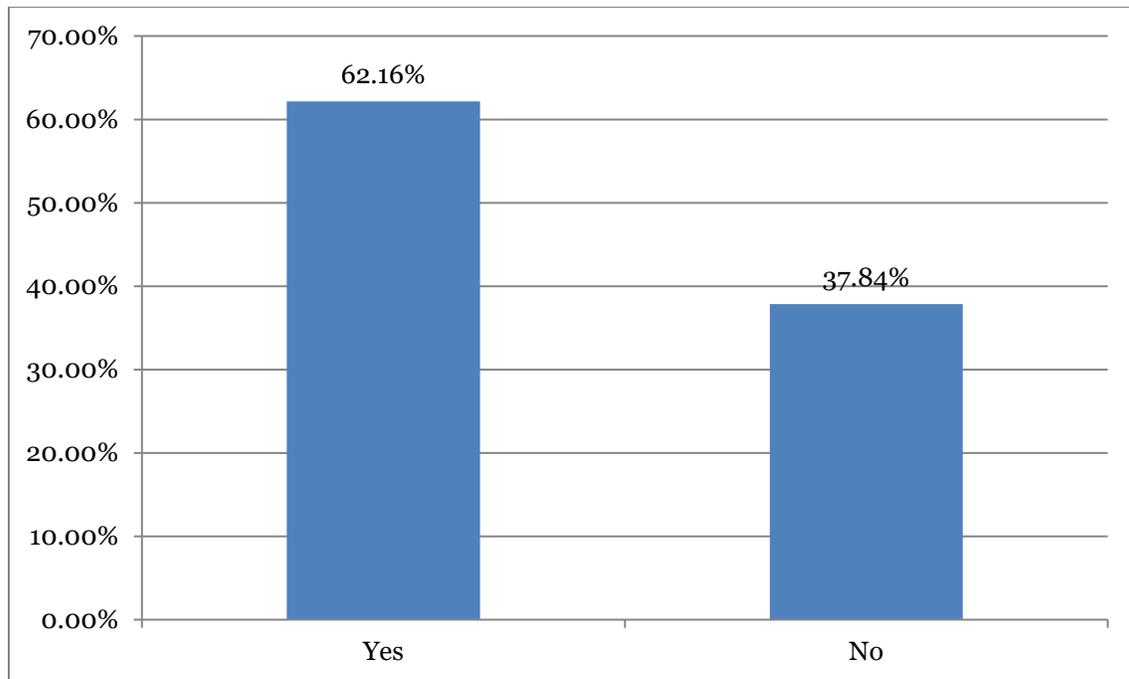


Comments:

- Reimbursement for personal aircraft usage is capped to the value of an economy class fare, which may include Economy Plus or Premium Economy, on a commercial flight to the same destination.
- Our policy requires travel and lodging to be modest and reasonable and prohibits luxury travel.
- Comparable cost of a first-class ticket, meals, parking, hotel (if applicable). No compensation.
- Reimbursement limited to economy class ticket on a commercial flight.
- Assessed on an exceptional basis and occurs very rarely.
- We've never encountered this but would not compensate HCPs for travel via their own private aircraft.
- We have never had this request.
- This has not come up for us yet.
- Never had this come up.
- We do not allow it.



31. Do any of your company’s HCP travel policy requirements vary depending on the country?

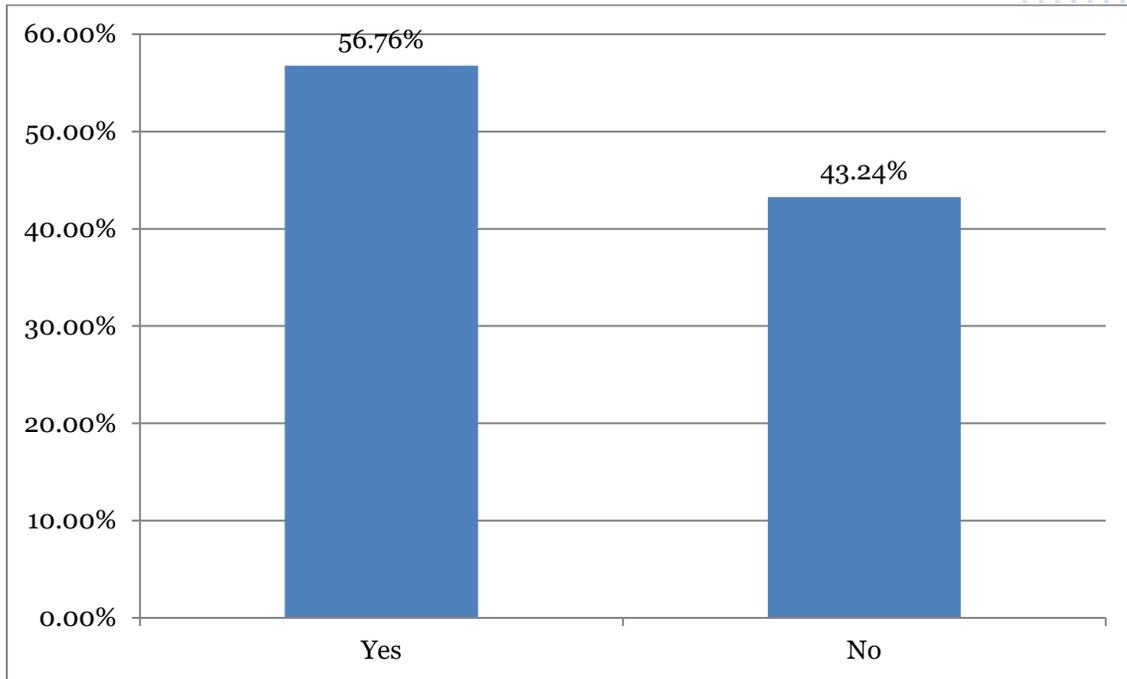


Comments:

- We have a global policy, but there are local policy supplements for certain countries.
- The policy varies in the US vs. OUS to allow for country-specific travel requirements.
- Sometimes laws differ in various countries, but mostly the policies are similar.
- Where local country has more specific requirements, we follow the local requirement.
- US HCP-specific travel policy differs from the company’s global standards.
- Within Europe, flights are short: economy or economy plus, no business.
- For the Americas region, it is the same but may differ in other regions.
- Additional lodging and meal restrictions exist for certain countries.
- Limits for meals and accommodations vary by country.
- Region and country-specific travel policies exist.
- Varies by country/region.
- We are only in North America commercially, with no difference between the U.S. and Canada.



32. Does your company policy permit HCPs to stay at hotels that have golf courses on-site? If yes, please explain any relevant circumstances required in the Comments.



Comments:

- We look at the totality of the circumstances when it comes to hotel/venue selections for large business meetings involving HCPs. A golf course alone would not disqualify a hotel/venue so long as there is other reasonable justification for hosting the meeting at a particular hotel/venue (capacity for large groups, meeting space(s) availability, etc.).
- Lodging must be selected based on legitimate business need and unrelated to the presence of adjacent recreational activities. Employees must work via Sourcing to ensure selection of an appropriate and cost-effective hotel.
- If the professional services being performed occur at a resort-type destination where a third party is hosting the event, then it is allowed. However, company-hosted educational events should not be conducted at resort-type venues.
- We discourage HCP travel to resorts with golf courses or other recreational activities, but if the best option has a golf course, we will allow it with Compliance approval. And we won't pay for golf or other recreational activities.
- Access to the course and/or equipment is not included in the room rate paid by our company. Generally, such hotels are typically resorts, and policy states these must be avoided when possible.
- Depends on the venue determined by the host organization (e.g., conferences, conventions, trade shows, etc.).
- If they populate in the system, they meet our policies. This is not a factor for us to remove from the list. Our travel itineraries are typically very tight since the HCPs' availability is usually limited. No time for activities like golf.

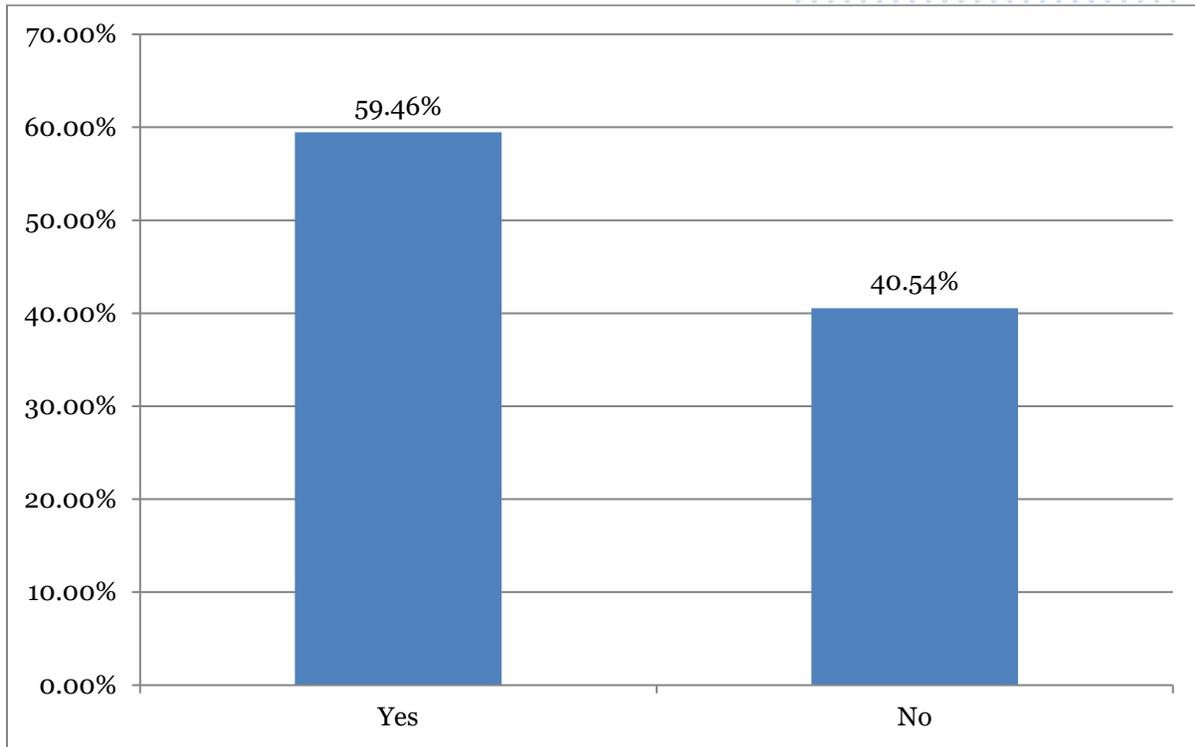


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- If it was within the hotel limit, no other option was available, and it was closest to the engagement, etc., as sometimes this is unavoidable, but we do not allow the HCP to pick the hotel.
- Principles-based: Whatever hotel is proximate and best suits/closest to the venue and within price limitations.
- Case-by-case basis depending on if the hotel is reasonable and modest for the area or if the activity is taking place at the hotel (e.g., convention or tradeshow located at the hotel).
- This may only occur if there is a third-party event hosted at such a location and we are holding an event in conjunction with the third-party event.
- All hotel stays for HCPs are arranged by corporate. This is not specifically called out in a written policy, but in practice, we do not allow this.
- May do so when the venue is chosen by a third party. Analyzed on a case-by-case basis.
- These should be avoided but will be reviewed on a case-by-case basis.
- If circumstances require this location.
- The policy does not directly prohibit it.
- Our policy does not address this topic.
- Not specifically prohibited in policy.
- Luxury/leisure/entertainment destinations are generally prohibited unless reasonable booking options are limited in a given geography.
- Lavish accommodations, which generally include resorts, casinos, luxury hotels (e.g., the highest star-rated hotels), and the like, are prohibited. Certain recreational-type locations, such as seaside, ski areas, golf resorts, and cruise ships, are prohibited.
- Our policy prohibits providing HCPs with mountain or golf-resort accommodations.
- No five-star properties.



33. Does your company policy permit HCPs to stay at hotels that have an ocean or beach view/access? If yes, please explain any relevant circumstances required in the Comments.



Comments:

- Lavish accommodations, which generally includes resorts, casinos, luxury hotels (e.g., the highest star-rated hotels), and the like are prohibited. Certain recreational-type locations such as seaside, ski areas, golf resorts, and cruise ships are prohibited.
- Lodging must be selected based on legitimate business need and unrelated to the presence of adjacent recreational activities. Employees must work via Sourcing to ensure selection of an appropriate and cost-effective hotel.
- Same comment as above - look at the totality of the circumstances of the meeting, and ocean/beach view access only would not disqualify a particular venue/hotel if other reasonable justification exists for hosting a meeting at that particular site.
- Case by case basis depending on if the hotel is reasonable and modest for the area or if the activity is taking place at the hotel (e.g., convention or tradeshow located at the hotel).
- If it was within the hotel limit, no other option was available, closest to the engagement, etc., as sometimes this is unavoidable, but we do not allow the HCP to pick the hotel.
- This may only occur if there is a third-party event hosted at such a location and we are holding an event in conjunction with the third-party event.
- Principles-based: Whatever hotel is proximate and best suits/closest to the venue and within price limitations.
- May do so when the venue is chosen by a third party. Analyzed on a case-by-case basis.

These should be avoided but will be reviewed on a case-by-case basis.



- It may be a hotel of choice connected to a conference or activity.
- Not specifically permitted but not prohibited.
- Our policy does not address this topic.
- If circumstances require this location.
- Depends on the venue determined by the host organization (e.g., conferences, conventions, trade shows, etc.).
- If the professional services being performed occur at a resort-type destination where a third party is hosting the event, then it is allowed. However, company-hosted educational events should not be conducted at resort-type venues.
- In conjunction with third-party conferences, or location conducive for large-scale meetings with appropriate justification.
- As long as the hotel meets our other requirements, ocean or beach view or access is not a specific factor.
- Luxury/leisure/entertainment destinations are prohibited unless reasonable booking options are limited in a given geography.
- On occasion, when it's a 4-star and we have a negotiated room block and it is not a resort.
- Our policy does not expressly permit or prohibit hotels with ocean or beach views.
- Under limited circumstances.
- All hotel stays are arranged by corporate. This is not specifically called out in a written policy, but in practice, we do not allow this.

34. Does your company policy specify any other limits on the type of hotel an HCP can stay in the US or countries that do not otherwise have specific restrictions? (e.g., luxury or resort hotels, hotels within a certain distance of business meetings, etc.).

Responses:

Respondents noted that determinations as to reasonable and modest accommodations are based on various factors including: luxury, 5-star/class of service, and/or entertainment property categories; hotel rates; and/or proximity to a major airport. Four respondents noted no additional limits on type of hotel accommodations other than those addressed in previous questions. Some additional details are below:

- Luxury hotels and resorts not permitted. The company has a selection process that employees must follow to ensure appropriateness.
- Accommodation must always be reasonable and appropriate. In addition, top-rated hotels, luxury hotels, or hotels that are renowned for entertainment facilities may not be selected as accommodations.
- Typically, luxury or resort hotels are prohibited and the most convenient and economical option would be booked.
- 4 Stars or less – hotels associated with gambling or other similar activities should be avoided.



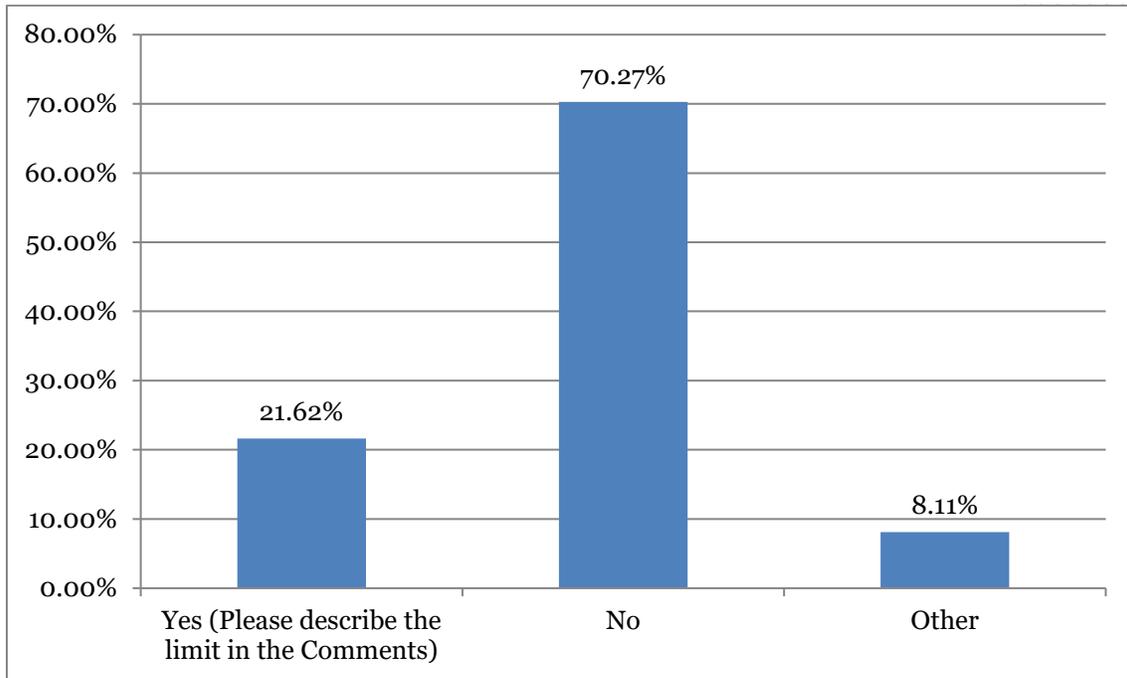
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- Our policy requires HCP lodging to be modest, reasonable, and at the class of service/level permitted for company employees.
- Luxury/leisure/entertainment destinations are prohibited unless reasonable booking options are limited in a given geography.
- Accommodations must be reasonable and appropriate, avoiding top category or luxury/resort/entertainment facilities.
- Lavish accommodations, which generally include resorts, casinos, luxury hotels (e.g., the highest star-rated hotels), and the like, are prohibited. Certain recreational-type locations such as seaside, ski areas, golf resorts, and cruise ships are prohibited.
- If the professional services being performed occur at a resort-type destination where a 3rd party is hosting the event, then it is allowed. However, company-hosted educational events should not be conducted at resort-type venues.
- The hotel chosen should be modest and of reasonable cost. Luxury hotels should be avoided. Also, the hotel should be located within a convenient distance of the event and/or airport.
- Yes. Any meeting facility or hotel where HCPs will be lodged must be reasonable and appropriate to the business purpose.
- Yes, our policy indicates we will not pay for HCPs to stay in luxury or resort hotels.
- Distance from major airport and no luxury or destination locations.
- Yes. Moderate hotels are approved. Luxury hotels are not.
- No luxury or entertainment venues (casinos, etc.)
- AdvaMed Code definitions of resorts are prohibited.
- Should not be at an entertainment facility.
- No luxury or resort locations.
- Yes, no resorts, no luxury.
- No luxury or resort hotels.
- No 5-star properties.
- No 5-star hotels.
- Yes, our limits in the US are no more than \$285 per night and they cannot be luxury hotels. We also follow our limits internationally, and those also prohibit luxury and resort hotels.
- We restrict hotel stays to modest hotels. This is capped by the rates we pay for the hotel.
- The hotel should be modestly priced and located near the business meeting location.



- Our policy states "modest and reasonable."
- "Reasonable"

35. Does your company have an annual spend limit per HCP (other than California) (for travel, meals, and accommodations)?



Comments:

- We cap all compensation (consulting fees, speaker fees, meals, travel, accommodations) at \$100,000 per HCP. Exceptions should be rare and approved on a case-by-case basis by Compliance.
- There are country-specific limitations on the meal costs to HCP attendees and per diem limitations for HCP faculty traveling to conduct company business.
- Reimbursement of travel expenses associated with HCP service contracts is separate from FMV remuneration or Stark cap.
- Total annual meal spend per individual HCP is limited to meals unrelated to a written service arrangement.
- The pharma segment of the organization has additional restrictions due to certain state requirements.
- No, but we audit HCP travel annually to identify any potential excess travel for HCPs.
- There isn't an outlined spend per HCP, but it's limited due to budget.
- Faculty agreements are capped, and we conduct spend monitoring.
- \$2000.

