

AdvaMed Device & Diagnostic Compliance Group

April 2026

HCP Travel

Distributed: January 13, 2026 – February 10, 2026
Collated: February 11, 2026
Questions: 39
Submissions: 47
Contacts: Ida Nassar, inassar@advamed.org
Quentin Roemer, groemer@advamed.org



BACKGROUND

AdvaMed surveyed its members regarding their policies on travel provided to U.S. Health Care Professionals (US HCPs). Forty-seven companies completed the survey between January 2026 and February 2026. 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 is not intended to reflect all medical technology company policies.

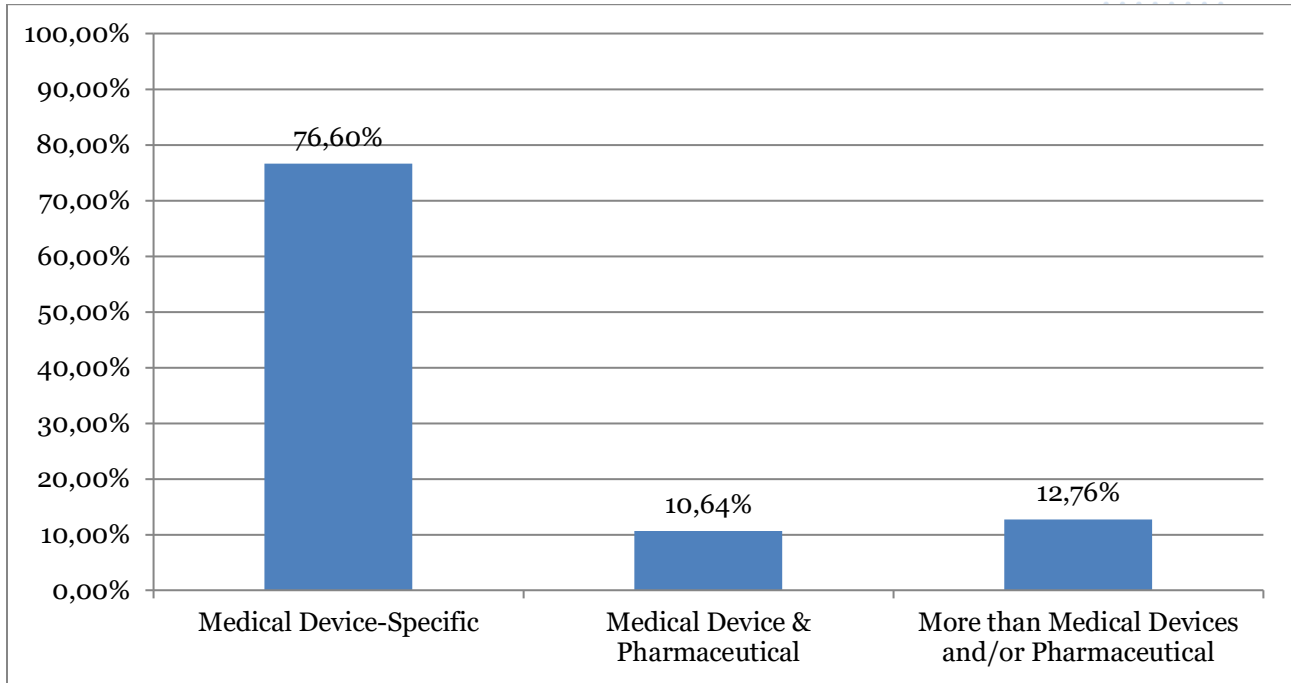
AdvaMed strongly encourages companies to adopt policies on travel provided to U.S. HCPs, including addressing many of the aspects summarized in this benchmarking data.

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.

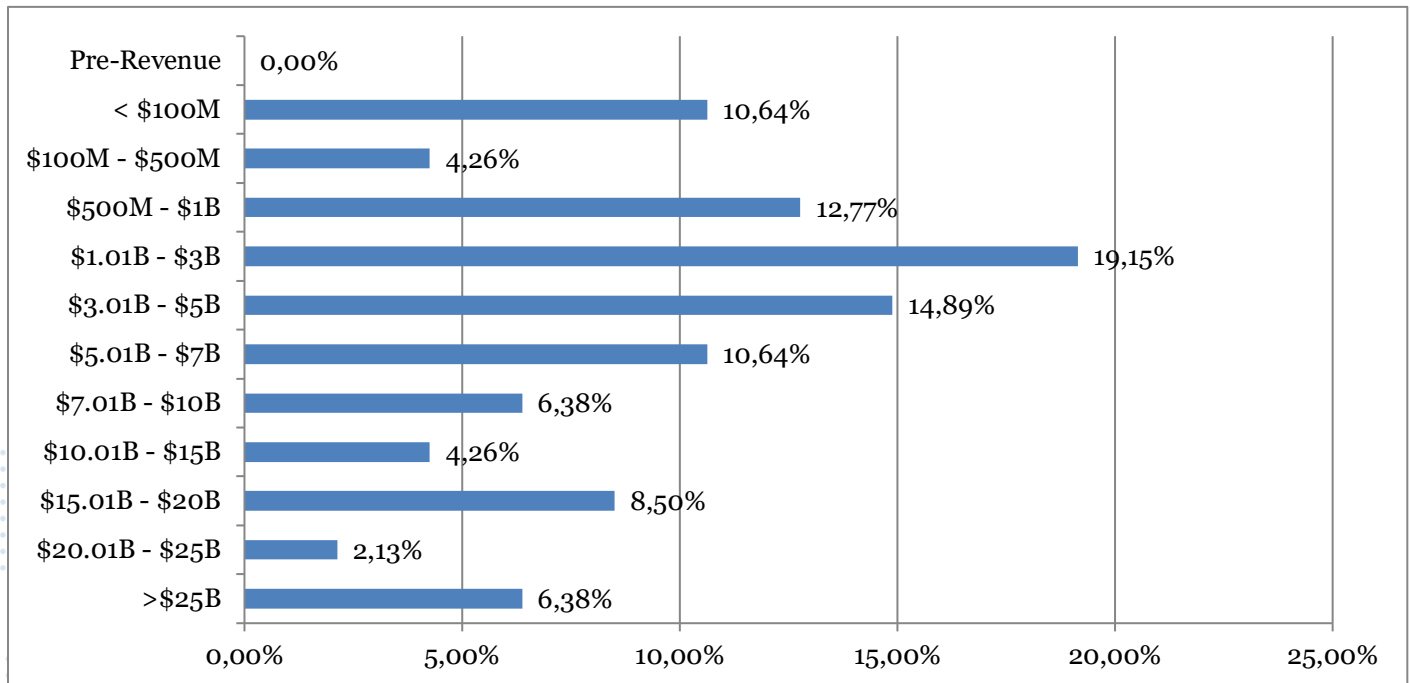


Demographics

3. Which below best describes your company?

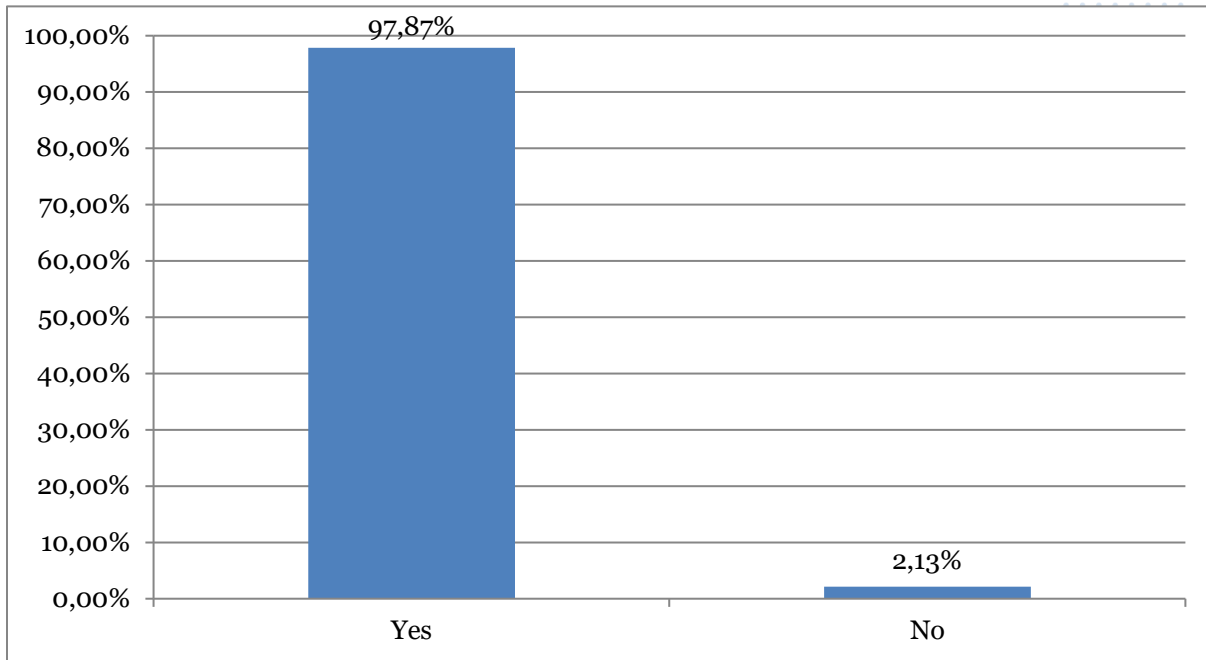


4. What was your Company's 2024 worldwide device-related gross revenue?



HCP Travel Policies

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



2024 & 2026 Comparison¹

(37 respondents in 2024, 47 respondents in 2026)

Have Established HCP Travel Policy	2024 Responses	2026 Responses
Yes	91.89%	97.87%
No	8.11%	2.13%

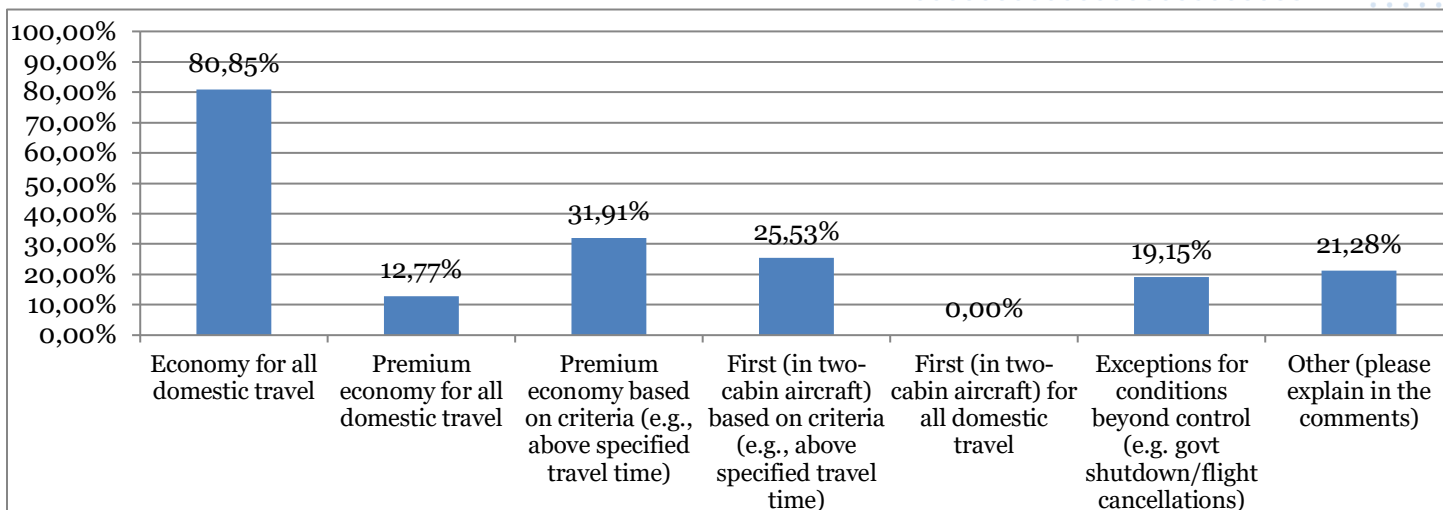
Comments:

- Customer Travel Agency Guidelines, but also included in our Global Interactions Policy and regional requirements are documented in our Country Supplements.
- Reasonable travel expenses reimbursed with pre-approval, HCP travel policy keys off of general employee travel reimbursement policy.
- Outlines purchases, sunshine law, etc. Compliance officer processes expense reports.
- We include language regarding HCP Travel in our overall Employee Travel Policy.

¹ Note: Respondent companies may differ year to year.



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



2024 & 2026 Comparison

(37 respondents in 2024, 47 respondents in 2026)

Class of US HCP Travel	2024 Responses	2026 Responses
Economy for all domestic travel	91.89%	80.85%
Premium Economy for all domestic travel	21.62%	12.77%
Premium Economy based on criteria (e.g., above specified travel time)	18.92%	31.91%
First (in two-cabin aircraft) based on criteria (e.g., above specified travel time)	18.92%	25.53%
First (in two-cabin aircraft) for all domestic travel	0%	0%
Exceptions for conditions beyond control (e.g. govt shutdown/flight cancellations)		19.15%
Other (Please Explain in the Comments)	21.62%	21.28%

Comments:

6 Respondents noted a five-hour flight time threshold for a higher class of service than standard Economy/coach. Some additional details:

- Generally Economy class (which may include Economy Plus or Premium Economy) unless the flight includes at least one leg scheduled for five 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.

- All airfare for trips of a duration of less than 5 hours (one-way) must be coach/economy class. Airfare for trips of a duration of 5 hours or more (one-way) may be premium economy, comfort, or business class. First class is prohibited without approval.
- Coach/economy airfare, but if the duration of the flight is 5 hours or more not including layovers or ground time or if the flight is an overnight red-eye then we may provide business class but not first class.
- Economy, including economy plus, as the standard for domestic travel. If the total flight time is above 5 hours then the HCP may be permitted to fly business class/premium economy.
- Domestic flights for more than 5 hours flight time will be eligible for first class (business class).
- Premium economy or business class allowed for a flight with a duration of 5 hours or more.

4 Respondents noted a six-hour flight time threshold for a higher class of service than standard Economy/coach. Some additional details:

- Non-consultant HCPs: Flights within the United States or outside the United States and less than six hours: economy or coach Flights outside the United States and greater than six hours: business Consultant HCPs: Business.
- Business class permitted for travel segments longer than 6 hours one-way for domestic or intercontinental travel.
- <6hrs economy class airfare, 6+hrs business class airfare.
- One level upgrade for flights >6 hours.

1 Respondent noted a ten-hour flight time threshold for a higher class of service than standard Economy/coach. Some additional details:

- Business class is approved when the flights are 10 hours or longer.

1 Respondent noted a three-hour flight time threshold for a higher class of service than standard Economy/coach. Some additional details:

- Business class for flights 3+ hours.

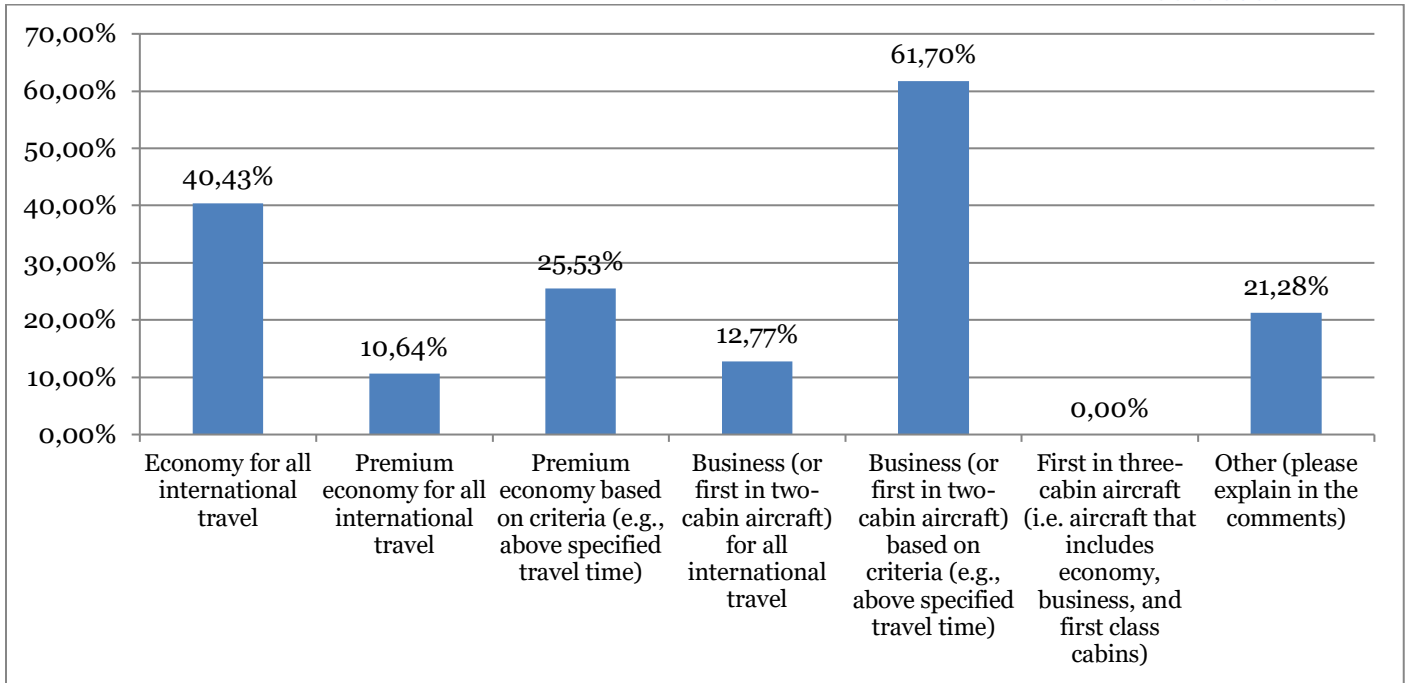
Additional Comments:

- Healthcare professionals may fly business class if travelling to provide consulting services for the Company as permitted by the Company Travel Policy; if travelling for any other purpose, such as flying to attend an event as a trainee instead of a Consultant, may only fly economy class for domestic flights but may fly business class for international flights.
- Generally, Economy Class for all travel, but Ethics & Compliance may approve exceptions, up to Business Class, although this is rare.
- Domestic travel regardless of flight time must be in economy class.
- HCP can upgrade on their own or if there is a medical reason that necessitates a different class (with supporting documentation).



- Premium economy based on traveler medical conditions.

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



2024 & 2026 Comparison

(37 respondents in 2024, 47 respondents in 2026)

Class of OUS HCP Travel	2024 Responses	2026 Responses
Economy for all international travel	43.24%	40.43%
Premium Economy for all international travel	24.32%	10.64%
Premium Economy based on criteria (e.g., above specified travel time)	13.51%	25.53%
Business (or First in two-cabin aircraft) for all international travel	10.81%	12.77%
Business (or First in two-cabin aircraft) based on criteria (e.g., above specified travel time)	59.46%	61.70%
First in three-cabin aircraft (i.e. aircraft that includes Economy, Business, and First-Class cabins)	2.70%	0%
Other (Please Explain in the Comments)	21.62%	21.28%



Comments:

7 Respondents noted a six-hour flight time threshold for a higher class of service than standard Economy/coach. Some additional details:

- Business class is permitted for flights greater than six 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 six hours: economy or coach Flights outside the United States and greater than six hours: business Consultant HCPs: Business.
- Business class permitted for travel segments longer than 6 hours one-way for domestic or intercontinental travel.
- Economy class unless the trip is greater than 6 hours, in which Business Class is then used.
- International flights of 6 or more hours may be booked in business class.
- <6hrs economy class airfare, 6+hrs business class airfare.
- Business for transcontinental flights longer than 6 hours.

7 Respondents noted a five-hour flight time threshold for a higher class of service than standard Economy/coach. Some additional details:

- Generally Economy class (which may include Economy Plus or Premium Economy) unless the flight includes at least one leg scheduled for five 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.
- All airfare for trips of a duration of less than 5 hours (one-way) must be coach/economy class. Airfare for trips of a duration of 5 hours or more (one-way) may be premium economy, comfort, or business class. First class is prohibited without approval.
- Coach/economy airfare, but if the duration of the flight is 5 hours or more not including layovers or ground time or if the flight is an overnight red-eye then we may provide business class but not first class.
- Premium economy or business class allowed for a flight with a duration of 5 hours or more.
- If the total flight time exceeds 5 hours, the HCP is permitted to fly business class.
- Business for travel segments over 5 hours.
- Business class can be eligible for flights of more than 5 hours (flight time) and in some cases more than 6 hours (flight time) depending on local rules or association codes.

1 Respondent noted a ten-hour flight time threshold for a higher class of service than standard Economy/coach. Some additional details:

- Business class when flights are 10 hours or longer.

1 Respondent noted a nine-hour flight time threshold for a higher class of service than standard



Economy/coach. Some additional details:

- Economy below 9 hours. Greater than 9 hours flight time is eligible for Business.

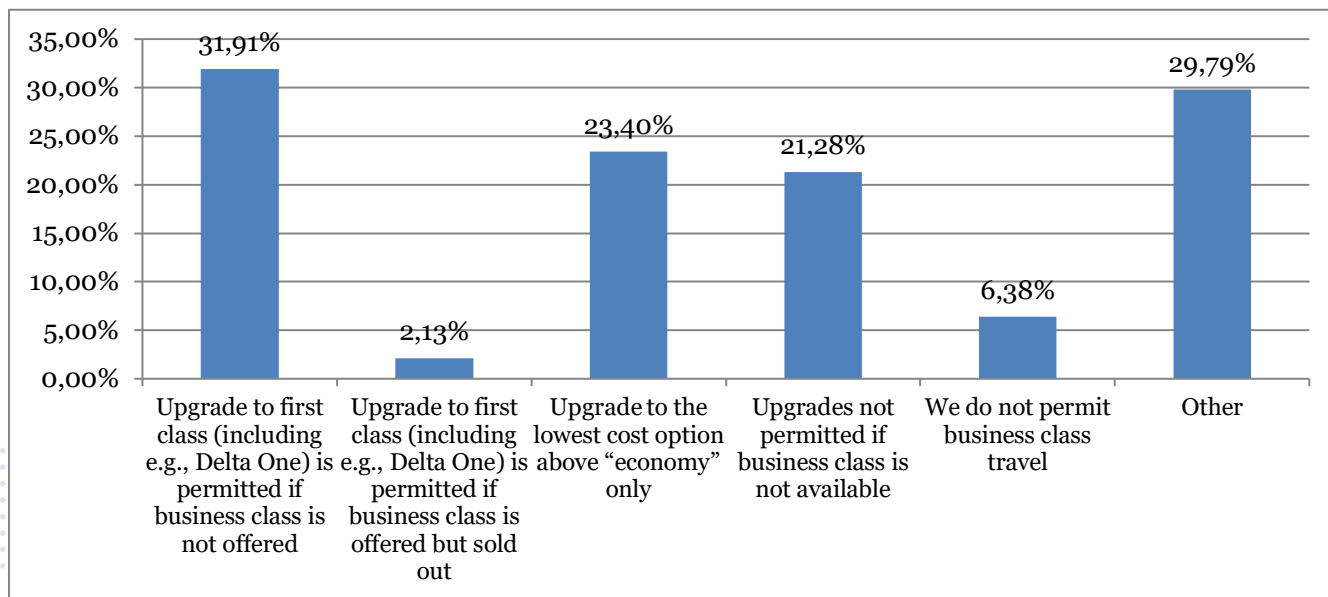
1 Respondent noted a three-hour flight time threshold for a higher class of service than standard Economy/coach. Some additional details:

- Business class for flights 3+ hours.

Additional Comments:

- Healthcare professionals may fly business class if travelling to provide consulting services for the Company as permitted by the Company Travel Policy; if travelling for any other purpose, such as flying to attend an event as a trainee instead of a Consultant, may only fly economy class for domestic flights but may fly business class for international flights.
- HCPs are given \$1000 stipend for international travel and free to choose their selected class within parameters of flight. (The only locations we serve internationally are Austria and Germany.
- Generally, Economy Class for all travel, but Ethics & Compliance may approve exceptions, up to Business Class, although this is rare.
- HCPs are permitted to travel in economy class, including “economy plus” or similar priority seating areas in the economy class.
- Business class is not permitted for HCPs.

8. If your company pays for HCPs to book Business class international travel under certain conditions (e.g., as noted in question 4 or 5 above), does your company permit any of the following when business class is not offered or available? [Please Select All That Apply]



2024 & 2026 Comparison

(37 respondents in 2024, 47 respondents in 2026)

Compensation of Business Class International Travel	2024 Responses	2026 Responses
Upgrade to First class (including e.g., Delta One) is permitted if Business class is not offered	18.92%	31.91%
Upgrade to First class (including e.g., Delta One) is permitted if Business class is offered but sold out	4.41%	2.13%
Upgrade to the lowest cost option above “economy” only	29.73%	23.40%
Upgrades not permitted if Business class is not available	16.22%	21.28%
We do not permit Business class travel	8.11%	6.38%
Other (Please Explain in the Comments)	40.54%	29.79%

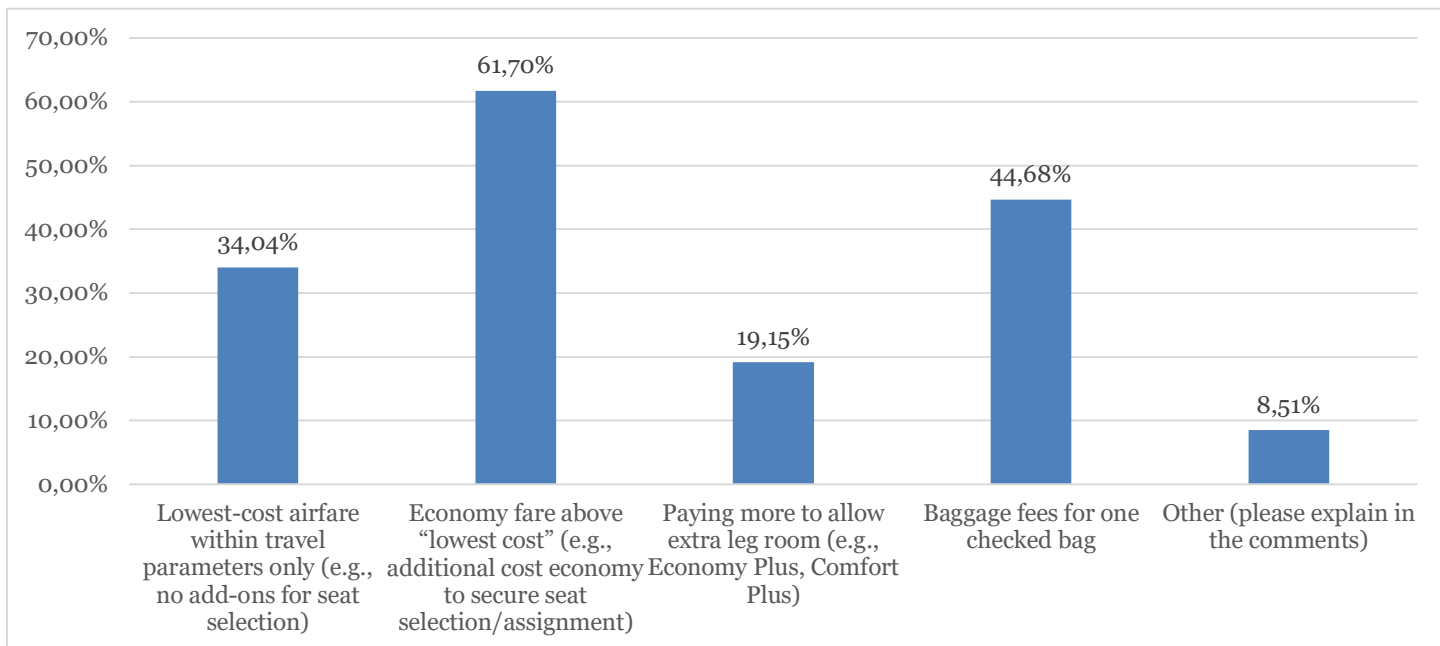
Comments:

- We only allow business class when flights are 10 hours or longer. We do not allow first class travel.
- Although policy doesn’t specifically contemplate this scenario, it prohibits First Class.
- International first class and suites are strictly prohibited.
- Upgrades to First class are prohibited without approval.
- Upgrades are not permitted.
- We do not allow upgrades.
- Generally, Economy Class for all travel, but Ethics & Compliance may approve exceptions, up to Business Class, although this is rare.
- We have not encountered this and would need to evaluate the situation to make a decision.
- We haven't come across this, any other solution would require Compliance approval.
- 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.
- Under certain conditions, US HCPs are permitted to travel in first class if business class is not available.
- Personal upgrades are managed by the traveler and at the traveler’s own expense unless otherwise approved by Ethics and Compliance.
- Upgrades are considered a personal expense.
- Our policy is silent on the topic, but we rarely engage HCPs to travel from US to International for Consulting services.



- We have not encountered the upgrade issue so far. There is no language in the policy supporting.
- We do not have an alternative listed in our policy if business class is not available.
- "Business class" OUS is referred in the US for domestic flights as "First class".

9. What 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]



2024 & 2026 Comparison
(37 respondents in 2024, 47 respondents in 2026)

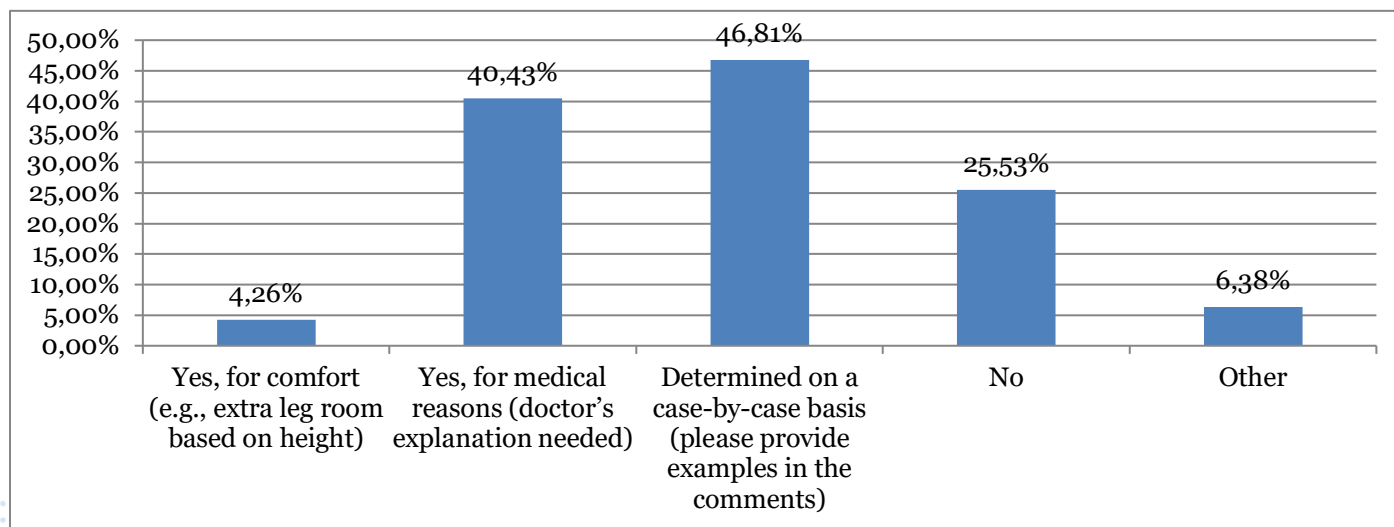
Policy for Standard for Booking	2024 Responses	2026 Responses
Lowest-cost airfare within travel parameters only (e.g., no add-ons for seat selection)	35.14%	34.04%
Economy fare above “lowest cost” (e.g., additional cost economy to secure seat selection/assignment)	64.86%	61.70%
Paying more to allow extra leg room (e.g., Economy Plus, Comfort Plus)	16.22%	19.15%
Baggage fees for 1 checked bag	48.65%	44.68%
Other (Please explain in the comments)	10.81%	8.51%



Comments:

- Economy fare above “lowest cost” (e.g., additional cost economy to secure seat selection/assignment), Paying more to allow extra leg room (e.g., Economy Plus, Comfort Plus), Baggage fees for one checked bag.
- Airfare for trips of a duration of 5 hours or more (one-way) may be premium economy, comfort, or business class.
- We do generally accept booking in Economy Plus - our practice is not yet reflected in the policy.
- Premium economy or business class allowed for a flight with a duration of 5 hours or more.
- Refundable economy ticket (so we can easily change travel plans, if needed).
- Healthcare professionals may fly business class if travelling to provide consulting services for the Company as permitted by the Company Travel Policy; if travelling for any other purpose, such as flying to attend an event as a trainee instead of a Consultant, may only fly economy class for domestic flights but may fly business class for international flights.
- Reimbursable tickets are selected to ensure changes can be done without paying more, in which case these tariffs include add-ons by default such as checked bags and seat selection. Extra leg room only on special cases as referred at question number 6.
- 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.
- We would consider extra leg room on a case-by-case basis.

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]



2024 & 2026 Comparison

(37 respondents in 2024, 47 respondents in 2026)

Cover HCP Airfare Upgrade for Space	2024 Responses	2026 Responses
Yes, for comfort (e.g., extra leg room based on height)	10.81%	4.26%
Yes, for medical reasons (doctor's explanation needed)	40.54%	40.43%
Determined on a case-by-case basis	45.95%	46.81%
No	27.03%	25.53%
Other	8.11%	6.38%

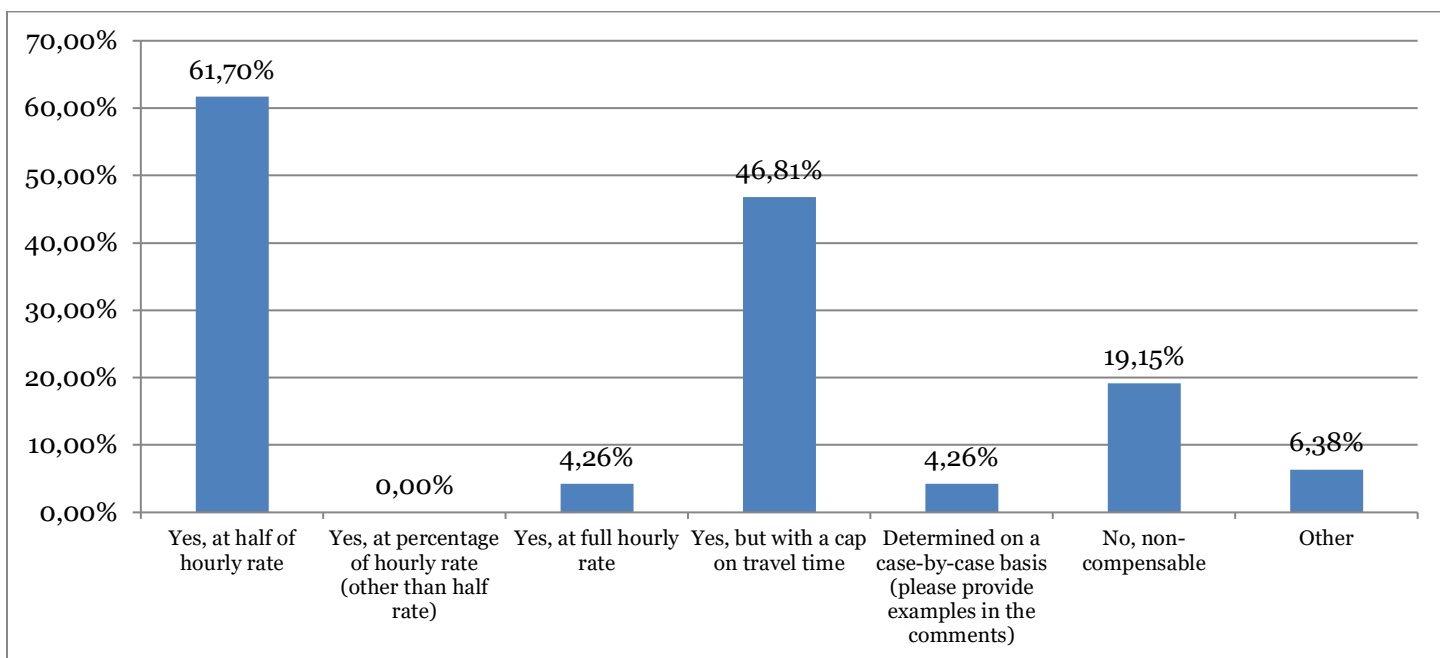
Comments:

- For example if an HCP had a back issue requiring extra leg room we would consider that. We generally do not require a doctor's note.
- Includes exceptions if HCP has medical reasons. Also, Ethics & Compliance may approve up to Business Class if appropriate, the business requests it and has the budget.
- Only through formal exception process and generally limited to being needed for a medical reason.
- We may accommodate for size or medical reasons, but this rarely/never happens.
- Not permitted by policy, but exceptions have been granted for medical reasons.
- Determined on a case-by-case scenario based on medical or physical need.
- Reviewed for medical reasons on a case-by-case basis.
- Reviewed for medical reasons on a case-by-case basis.
- May provide if physical or medical reasons.
- Allowed for medical exceptions as needed.
- HCPs are permitted to travel in economy class, including “economy plus” or similar priority seating areas in the economy class. Upgrade requests are reviewed through formal exception process.
- Exceptions to the class of travel are granted on a case-by-case basis. This could include additional leg room to accommodate for height, medical reasons, etc.
- Exceptions may be allowed if supported by a legitimate justification (e.g., the HCP has a medical condition and needs more leg room).
- Have not had this request yet but would review requests and determine on case-by-case basis.
- Only pre-approved by the Company in specific cases such as sickness or special health conditions.
- If explanation is provided and deemed appropriate, then might consider paying it. Case by case review.
- Depending on the circumstances and the request, potentially subject to exceptions process.
- If there was a legitimate need for them to need the upgraded airfare, it would be considered.
- Generally, no but would evaluate based on extenuating circumstances.



- Personal upgrades are managed by the traveler and at the traveler’s own expense unless otherwise approved by Ethics and Compliance.
- Upgrades are considered a personal expense.
- If an HCP was only able to fly on a red eye for patient care reasons, a business class seat could be considered with appropriate documentation.
- Airfare for trips of a duration of 5 hours or more (one-way) may be premium economy, comfort, or business class.
- Up to \$160 roundtrip permitted for preferred seat (bulkhead, economy plus).

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



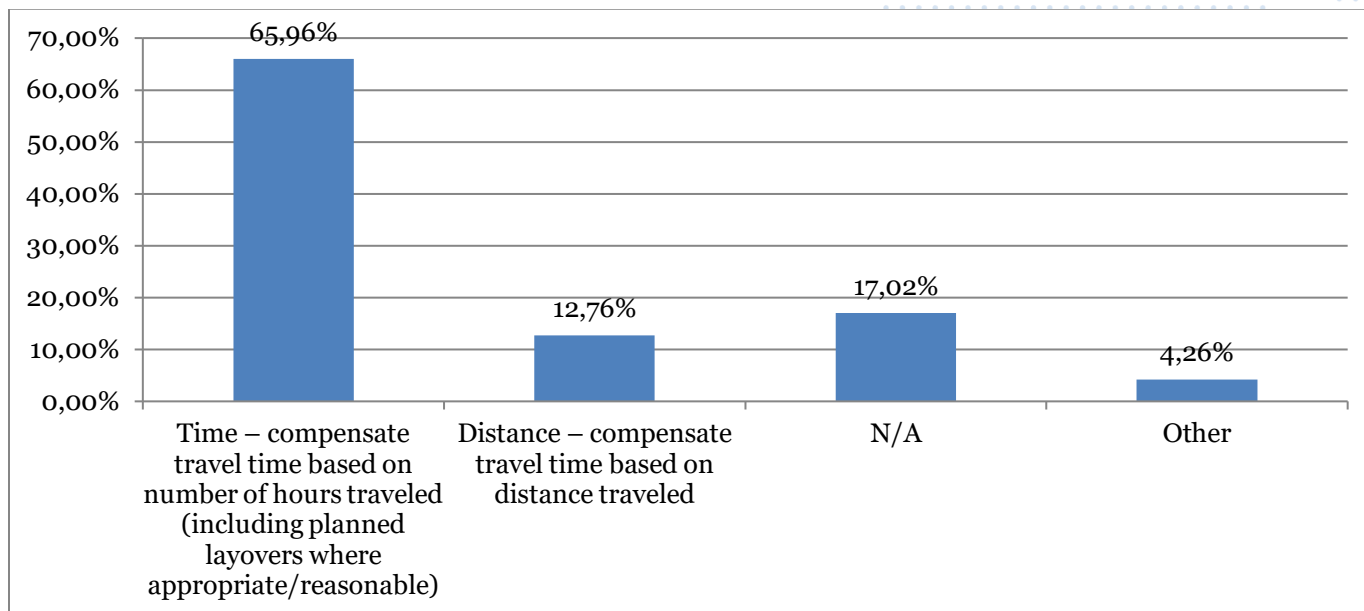
2024 & 2026 Comparison

(37 respondents in 2024, 47 respondents in 2026)

Compensate for Travel Time	2024 Responses	2026 Responses
Yes, at half of hourly rate	56.76%	61.76%
Yes, at percentage of hourly rate (other than half rate)	2.70%	0%
Yes, at full hourly rate	8.11%	4.26%
Yes, but with a cap on travel time	43.24%	46.81%



12. Do your company compensate travel time based on time or distance?



2024 & 2026 Comparison

(37 respondents in 2024, 47 respondents in 2026)

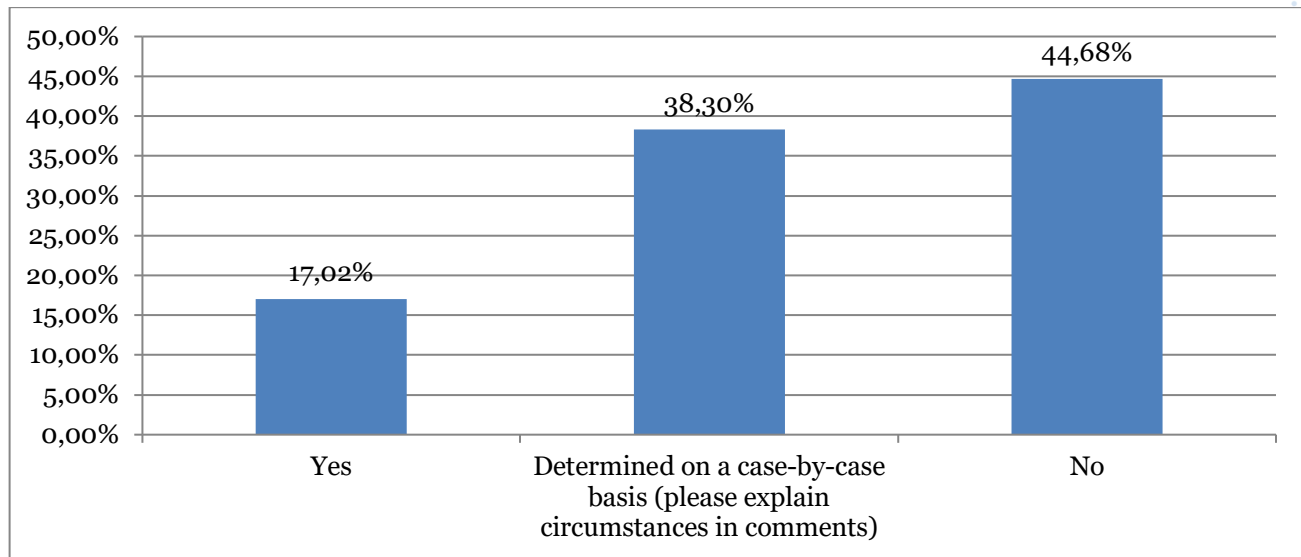
Compensate Travel Based on Distance	2024 Responses	2026 Responses
Time – compensate travel time based on number of hours travelled (including planned layovers where appropriate/reasonable)	59.46%	65.96%
Distance – compensate travel time based on distance travelled	21.62%	12.76%
N/A	13.51%	17.02%
Other	5.41%	4.26%

Comments:

- Time cap or predefined rate based on distance or time.
- We compensate actual travel time, excluding layovers.
- We consider time up in the air. No layovers included.
- We compensate based on time with a daily cap.
- Time is compensated for faculty only and is capped at 10 hours daily for travel and services combined.
- Travel time is paid at half the hourly rate after the first two hours.
- Only for consultants / speakers travel time is compensated.
- Exception based only.



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

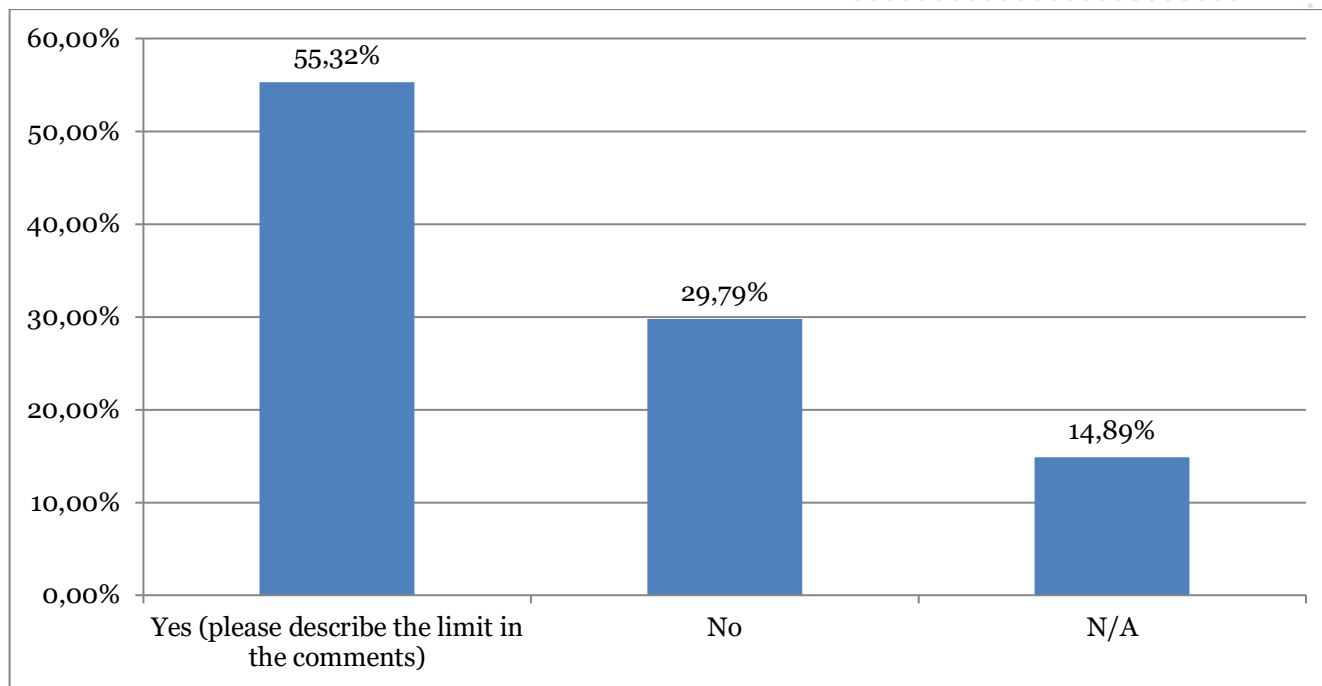


Comments:

- Travel time is capped. If the time spent in unplanned travel delays is within the cap, it is paid. If travel delays cause the travel time to exceed the cap, it is not paid.
- We cap travel time at 8 hours each way for domestic travel and 12 hours for international travel so it would depend on how long the trip and delay is.
- Time spent in the airport due to delays may be compensated as long as it is within the travel time cap.
- Capped hours address the situation.
- Case-by-case, is assessed before approval. Only for consultants / speakers travel time is compensated.
- Not something we have come across but would consider based on all factors considered.
- Review of circumstances (e.g., flight delay/cancellation, weather conditions, etc).
- We have not yet had this happen. Will assess based on the situation.
- On a case-by-case basis, e.g., if the delays are not the HCPs fault.
- We may pay for HCP time spent for unplanned travel delays, but this rarely/never happens.
- It depends on if the travel delay was caused by the HCP or if it was no fault of the HCP.



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, & 2026 Comparison
 (37 respondents in 2024, 47 respondents in 2026)

Time Cap	2023 Responses	2024 Responses	2026 Responses
Yes	62.50%	70.27%	55.32%
No	16.70%	13.51%	29.79%
N/A	20.80%	16.22%	14.89%

Comments:

11 Respondents noted an eight-hour limit under various circumstances (with some noting varying limits based on geography). Some additional details:

- Travel for HCPs within the U.S. and Canada is capped at 8 hours for travel per each way of round-trip travel (international travel: cap of 24 hours for travel per each way of round-trip).
- Travel time is capped at 8 hours for travel within the US, North America and Central America, 10 hours to/from Europe and 12 hours to/from Asia and Australia.
- In the event that roundtrip travel greater than two (2) hours is required, we compensate for travel time not to exceed eight hours of compensable travel time.
- We cap travel time at 8 hours each way for domestic travel and 12 hours each way for international travel.
- Yes, up to 8 hours domestically and 10 internationally.
- 8 hours per day maximum.



- We limit to 8 hours per leg.
- 8 hours per travel leg.
- Cap at 8 hours a day.
- Max 8 hours.
- 8 hours.

3 Respondents noted a 10-hour limit under various circumstances. Some additional details:

- Only faculty may be compensated. This is capped at 10 hours daily which includes travel and services.
- Yes, for up to 10 hours of consulting services in any one calendar day inclusive of travel time.
- 10 hours per trip if domestic. 20 hours per trip if international.

2 Respondents noted a 12-hour limit. Some additional details:

- Maximum 12 hours, this includes hours of service + travel time.
- 12.

1 Respondent noted a 5-hour daily limit. Some additional details:

- Up to 5 hours per engagement based on domestic travel, and up to 8 hours per engagement for international travel.

1 Respondent noted a 15-hour daily limit. Some additional details:

- Up to 15 hours for domestic travel and up to 25 hours for intercontinental travel per trip.

1 Respondent noted a 20-hour daily limit. Some additional details:

- 20 hour max (paid at 50% = 10 hours).

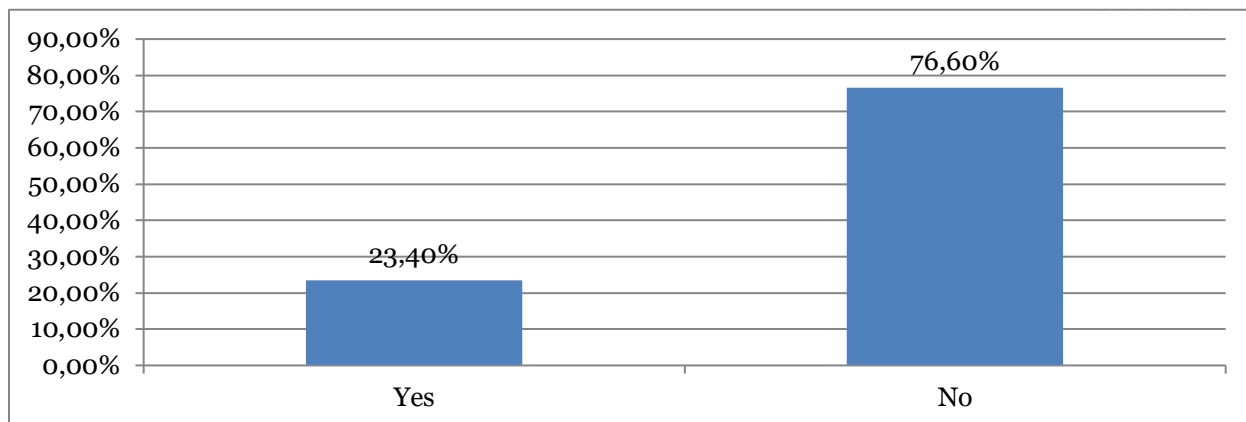
Additional Comments:

- Only for consultants / speakers travel time is compensated. The following caps apply when calculating travel time payments for HCP consultants: 0-15 hours total round trip in-flight travel time: 10 hours travel cap • 16-25 hours total round trip in-flight travel time: 20 hours travel cap • More than 25 hours total round trip in-flight travel time: 30 hours travel cap.
- Not addressed in policy but HCPs only compensated for number of actual hours traveled, not compensated for "downtime".
- On a case-by-case basis, depending on the trip. Direct flights are recommended whenever possible.
- Travel time compensation is not to exceed two times the total honoraria fee paid for the service.
- Compensation for travel may not exceed compensation for services.
- No cap per day, but total travel time capped at 16 hours, roundtrip.
- Time cap or predefined rate based on distance or time.



- Depends on the Business Need & contract.

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



2024 & 2026 Comparison

(37 respondents in 2024, 47 respondents in 2026)

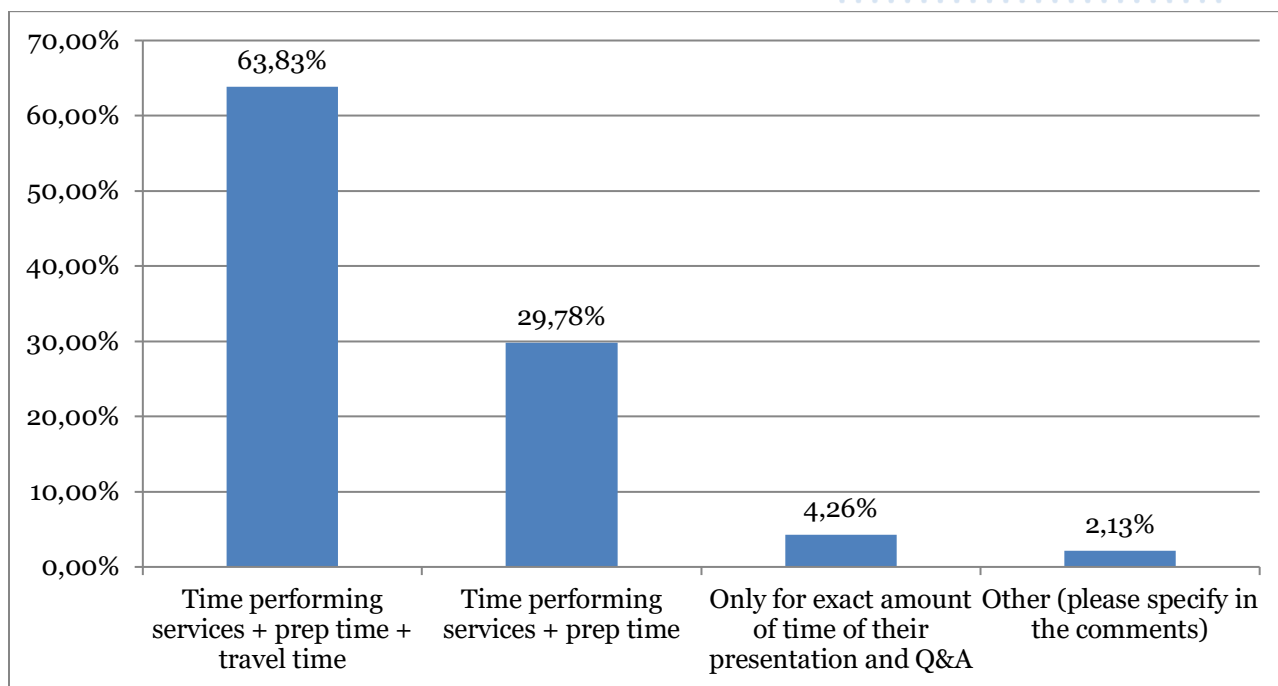
Compensation for Local Travel Time to/from Hotel & Meeting Destination	2024 Responses	2026 Responses
Yes	27.03%	23.40%
No	72.97%	76.60%

Comments:

- At up to 8 hours per travel leg.
- Exceptions may be considered when travel from the hotel to the meeting location requires more than 30 minutes.
- Compensation for travel time is included in the work authorization for the services being provided.
- Yes, for up to 10 hours of consulting services in any one calendar day inclusive of travel time.
- Don't compensate for less than an hour.



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



2023, 2024, & 2026 Comparison

(24 respondents in 2023, 37 respondents in 2024, 47 respondents in 2026)

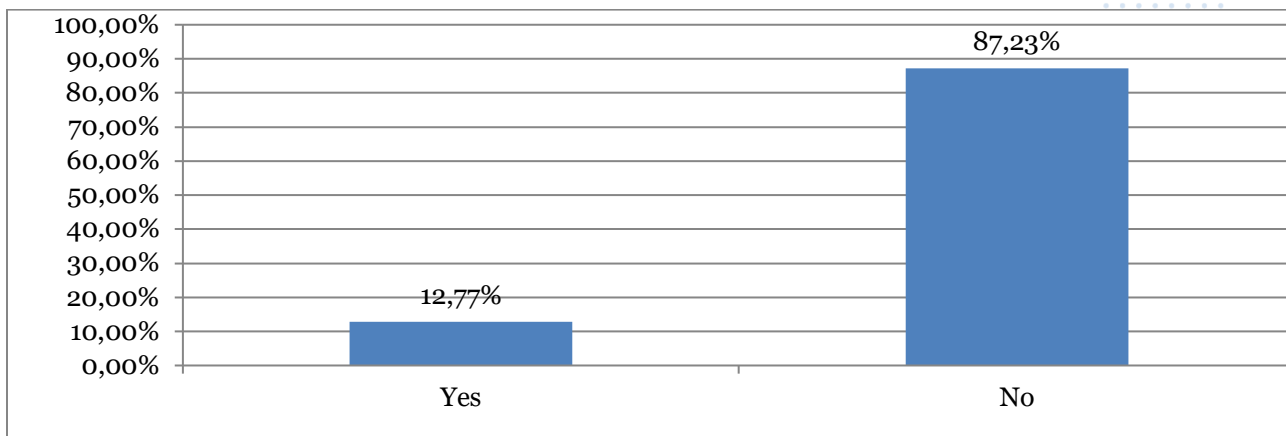
Service Time	2023 Responses	2024 Responses	2026 Responses
Time performing services + prep time + travel time	62.50%	51.35%	63.83%
Time performing services + prep time	33.30%	43.24%	29.78%
Only for exact amount of time of their presentation and Q&A	4.20%	0%	4.26%
Other	0%	5.41%	2.13%

Comments:

- Flat rate honorarium structure that accounts for prep time, time performing services and travel if a non-local program.
- Prep time may be considered for compensation on a case to case basis, if requested.
- We compensate for all 3 but at 50% for travel time up until a limit.
- Travel time is paid at half the hourly rate after the first two hours.



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, & 2026 Comparison

(24 respondents in 2023, 37 respondents in 2024, 47 respondents in 2026)

Minimum Time Requirement	2023 Responses	2024 Responses	2026 Responses
Yes	8.30%	16.22%	12.77%
No	91.7%	83.78%	87.33%

Comments:

- When interregional (e.g. APAC to US) travel time is compensated, there should be a reasonable number of consulting hours to support the need (we see at least 12 hours of consulting time reasonable).
- Travel is only permitted when the HCP cannot reasonably perform the activity virtually (e.g., a presentation that could be delivered over Teams).
- While there is no set policy the minimum amount of time corresponds to the length and cost of the travel.
- For consulting services is an (1) hour, for Voice of Customers is thirty (30) minutes.
- We do not currently have a Speaker Program.
- We don't have a written policy, but we wouldn't pay for less than 30 minutes of service. For travel the amount of service would have to make sense for the amount of travel.
- 30 minutes.
- Minimum 15 minutes.
- Must be reasonable and aligned with business rationale and engagement.
- No fixed minimum, must demonstrate legitimate business need.
- HCP can only be compensated for FMV for services provided, short duration engagements are reviewed on a case-by-case basis to determine FMV.
- We review the activity on a case by case taking into account several criteria to determine if the service is compensable.



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

Responses:

13 Respondents noted that the decision would be made on a case-by-case basis. Some additional details:

- Decided on a case-by-case. 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.
- These instances are decided on a case-by-case basis, however in one of our companies' policy we do specify that we will consider a cancellation fee equal to half the value/services of the course.
- This is handled on a case-by-case basis. We would pay for prep time already incurred, provided they give us a copy of the presentation.
- Other meeting cancellations would be reviewed on a case by case basis, consultants only may be reimbursed for time, not attendees
- Faculty would be compensated for lost office time. This would be offered on a case-by-case basis.
- We would review on a case by case basis. Reasonable, non refundable travel expenses already incurred may be reimbursed.
- Would be evaluated on a case-by-case basis (due to extreme weather, medical reasons, etc.).
- Would depend on circumstances. Must be modest and reasonable.
- Not yet experienced, would address on a case-by-case basis.
- It varies based on situation and the reason for cancellation.
- Would determine on a case-by-case basis.
- Determined case-by-case.
- Assessed case by case.

12 Respondents noted that reasonable reimbursable costs include the time spent preparing and/or any travel time or expenses already incurred. Some additional details:

- We will pay for prep time. If the HCP already traveled to the location, we would consider paying the travel time as well. If the HCP shows up to a speaking engagement but no attendees arrive, we will pay their time.
- We will compensate for preparation time and any travel time actually incurred prior to the cancellation. We will reimburse out of pocket costs for HCP (if they booked their travel), however book HCP travel on their behalf most of the time.
- We would permit reimbursing out-of-pocket expenses already incurred as well as any actual preparation or travel time, if the HCP was travelling at the time of cancellation. Anything else subject to case-specific review.



- 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 known.
- Travel expenses already occurred would be reimbursable, and travel time and work completed prior to cancellation may be reimbursable. Work cancelled is reimbursable at 50% of the hourly rate.
- HCP would be paid for services performed (e.g., prep time), travel time, if applicable, and reimburse for reasonable expenses incurred during travel, if applicable.
- We would pay the HCP the agreed upon hours for prep and presentation. Travel time would not be paid.
- HCP travel is booked by the company and would be canceled. Prep time would be reimbursed.
- Pre-approved travel fees that are non-refundable and paid in advance by the HCP.
- Time spent preparing and travel time incurred (travel time paid at half the hourly rate.
- Any travel incurred would be reimbursed (50% for us).
- Time performing services + prep time + travel time.

14 Respondents noted reimbursable costs depending on the timing of the cancellation and the company's role in the cancellation. Some additional details:

- In the event that we cancel scheduled Services and Services not rescheduled, for any reason, we will provide compensation for such Services as follows:
 - One hundred percent (100%) of scheduled service hours at the rate specified if Services are cancelled within forty-eight (48) hours of the scheduled event (not to exceed sixteen (16) hours of compensation, inclusive of the below stated travel time compensation, if applicable).
 - Seventy-five percent (75%) of scheduled service hours at the rate specified if Services are cancelled within seventy-two (72) hours of the scheduled event (not to exceed sixteen (16) hours of compensation, inclusive of the below stated travel time compensation, if applicable).
- It depends on who cancels the course—the company or the HCP. If the cancellation is due to our company, and it occurs close to the scheduled date, we may consider compensating the HCP for the time they had reserved for us, recognizing that they may have declined other bookings.
- If it was the fault of our company for the cancellation and the HCP had OOP expenses or had traveled for the event to perform, the HCP would be compensated. This would require less than 48 hours notice.
- 1/2 the hourly rate. agreements include cancellation language to address this so depends if the company cancelled or the speaker cancelled and based on the timeframe for which the event/speaker cancelled.
- It depends on the reason for the cancellation. If it is out of the HCPs hands and is due to company cancellation, we would be pay for the planned time promised and associated travel expenses
- For events cancelled less than 24 hours before the event, the requested service time would be paid, but only actual travel time incurred, if any would be paid.
- Depends on the issue, if the HCP cancels we would not reimburse. If cancellation is due to an issue on our end then we would reimburse accordingly.



- For speaker programs, 3-5 days prior to event, receive 50% honorarium; 0-2 days prior to the event, receive 100% of honorarium.
- We have a cancellation policy based on when the service was cancelled - some percentage if they were already traveling, etc.
- We will compensate for hours of service to the HCP if the cancellation is a due to a Company related situation or request.
- We have a tiered cancellation policy depending on how many days out from the program the cancellation occurs.
- If cancellation is on company side, reimbursement may potentially be discussed.
- Any prepaid expenses that could not be cancelled anymore, e.g., airfare or hotel.
- 14 days, no pay, 7 days, half, less than 7 days, full pay.

3 Respondents noted that there would be no compensation. Some additional details:

- If course is cancelled there would be no compensation for travel.
- Nothing would be reimbursed as no costs were incurred.
- Nothing.

Additional Comments:

- Additional hotel night, meals, will be arranged through Company's travel agency.
- Any Business expenses incurred with valid, itemized receipts.
- N/A - not addressed in our policy.
- NA

19. What is your company policy regarding HCP use of local transportation, including ride share (Uber/Lyft), reserved car service, rental car, and is the policy dependent on travel distance from the airport or other factors?

Comments:

- We may arrange, pay for or reimburse, the reasonable cost of a rental car (US/CAN only), train, taxi service, ride share service, shuttle, ferry, public transportation, personal automobile mileage, parking, and/or tolls for an HCP who requires ground transportation to attend or participate in an approved activity. Rental cars should be of a reasonable class and size.
- Normal, business-related expenses for ground transfer (taxis, shared rides) or car services are permitted. No limousines. Allowable between home/office and airport/train station and between hotel and event and airport/train station. Other transportations, such as trains, bus and subway, are



allowable and encouraged to minimize costs.

- We allow HCPs to use the means they select depending on distance and convenience, provided that it shall be economically efficient for us. Usually reserved car service is organized directly by the company for organized events while the choice between rental car and taxi and/or ride share is left to HCPs based on distance and cost.
- Round-trip ground transportation between airport, hotel and program may include taxis, Ubers, car service or other comparable services. Limousines should be avoided even if the cost is comparable to taxi or Uber.
- We allow use of these transportation methods. Based on travel distance, location etc, our team works with HCP to select the best, most cost effective method of travel.
- Company may provide whatever form of modest ground transportation is most cost effective based on the location, number of passengers, etc.
- Travel must be cost efficient and sustainable also depends on the location of the engagement.
- We reimburse ground transportation if required. If they are local we may offer mileage.
- this travel is permitted. There are no guidelines for when to use one versus the other.
- Typically we allow reasonable local transportation including ride share.
- Reimbursement if HCP provides receipts of actual expenses incurred.
- Taxi cab, ride share, and reserved car service are reimbursable.
- We use a reasonable standard for local transportation.
- Permits rideshare, taxi, car rental when appropriate.
- local transportation is reimbursed or paid directly
- Travel expenses must be modest and reasonable.
- Reasonableness. Typically car service
- Reimbursed with receipts.
- Reimbursable.
- Reimbursement for ground transportation costs (such as taxi, car service, ride shares, bus, train, subway fare, parking, and mileage for personal vehicle use) incurred by HCPs is generally appropriate and must be reasonable and necessary. Car service is permitted in limited circumstances when organized by the Company and reasonable and necessary to accommodate multiple HCPs. The policy is not dependent on travel distance but must be reasonable and necessary.
- Ground transportation allowed: Train, Taxi, Uber, Lyft, personal vehicle or other on demand car service. Rental car and car service require Compliance pre-approval.
- We prefer Uber/Lyft when available. We do allow a reserved car service for late/early arrivals to ensure availability. Additionally, we've had a lot of HCPs recently raise concerns about safety regarding Uber/Lyft so we allow a reserved car service if they cite those concerns.
- No livery/reserved car service/limo permitted. Ride share services and taxis are permitted. Rental cars



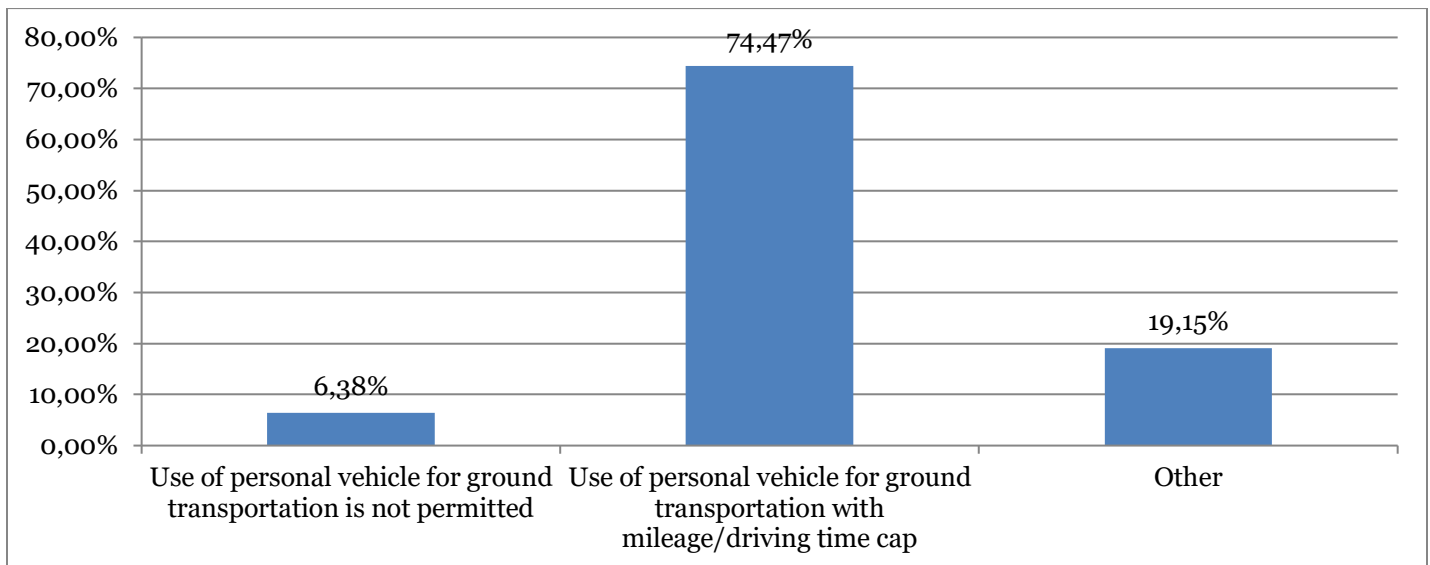
permitted with prior agreement and through company designated travel agency.

- It depends on the event. The majority of time, Uber/Lyft or Taxi would be used. However, black car service may be reserved in some cases. We typically do not reimburse for rental cars.
- Reasonable transportation expenses are permitted for ride share, rental car. Car service must be reviewed and approved in advance on a case by case.
- Taxi, Uber, Lyft are permitted. If a group of HCPs need travel for an event, a car service is arranged by the company in advance.
- Uber/lyft if fine for local travel, rental cars/expensive car service requires compliance approval.
- Policy allows for ride share use, rental car in some situations, depending on distance and use.
- It's in the policy (and their contract) they may not take Uber Black, etc. They are not prohibited from renting a car, but must use economy options when traveling (train, ride share, taxi vs limo, etc.)
- All ground transportation must be reasonable and not luxury. Train travel may be business class, and first-class train travel is permitted where there is no designated business class option.
- Our policy is that ground transportation must not be luxurious, regardless of distance traveled or any other factors.
- No uber black or premium car services. Reasonable and necessary expenses permitted.
- Local transportation may not be considered luxurious.
- HCPs may submit for reimbursement receipts for taxi or ridesharing services (such as Uber or Lyft) between destination airport and venue only if business is not arranging for shuttles to/from venue location. Business is not able to reimburse for upgraded ridesharing services (such as XL, Lux and Comfort options.) We are not able to reimburse for car rentals.
- Business use of an airport shuttle or van, taxi, ride sharing service, rental car or personal vehicle will be reimbursed. Private car service arrangements will not be reimbursed.
- Use of ride sharing services are authorized, and vehicle rental require additional approval. No policy for travel distance.
- HCPs may use Uber and taxis, for which we reimburse them, but generally we do not pay for rental cars.
- Pay for taxi, ride share, but not car services.
- All arrangements are made in advance through Company's travel agency or booking website.
- Taxi, non-limousine car service, mid-sized car rental, or comparably priced ground transportation.
- HCPs are reimbursed normal, business-related expenses including gratuities up to 20% for taxis, airport shuttles or app-based ride sharing such as Uber or Lyft provided receipts are submitted.
- We will pre book taxis for the cases where the HCP is hosted in a hotel and not walking distance from the venue where the service will be delivered.
- All costs incurred must align to the company policy that is shared with the HCP and which they are trained on as part of onboarding.
- Ride share reimbursed for Uber X, Comfort or Lyft standard.



- No policy for travel distance.
- No distinct policy on use of local transportation. For travel and lodging expenses, the Company usually books the flight and hotel on behalf of the HCP. The Company policy requires that travel, arrival, and departure times shall be closest in time to the date and time of the event; and arrival and departure cities shall be the closest in location to the event.
- No policy – travel to/from the airport and hotel would be a reimbursable expense.

20. Does your company policy on local transportation permit HCP use of personal vehicle?



Comments:

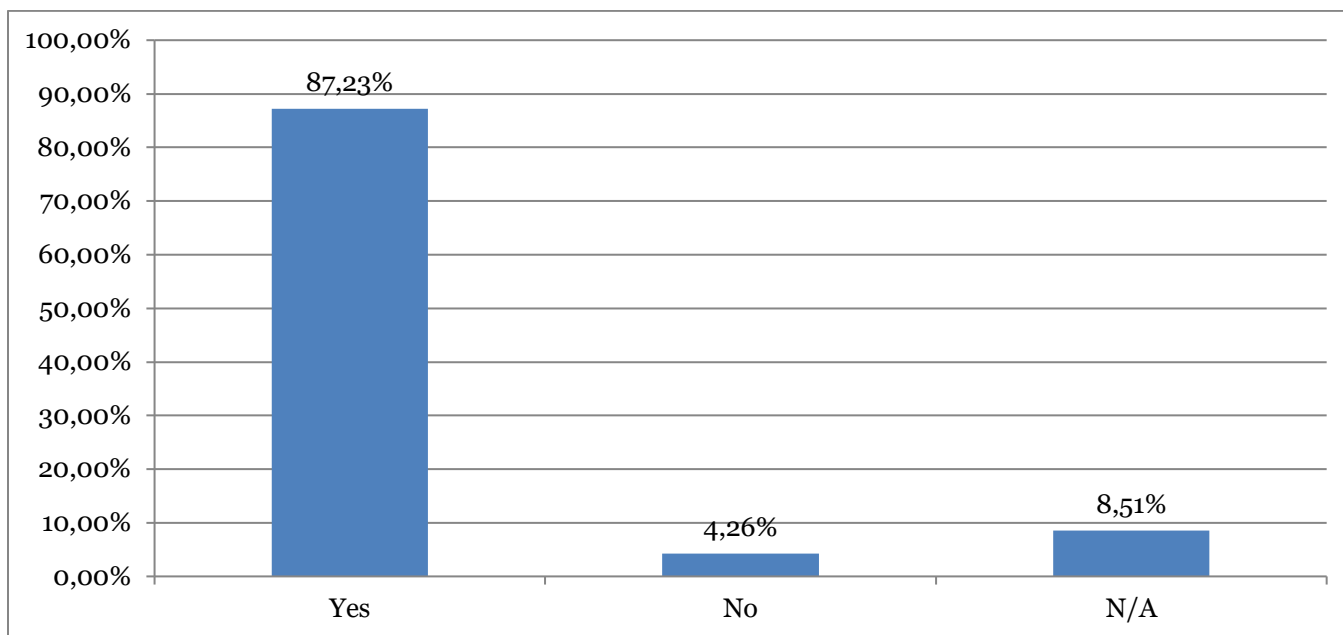
- HCPs may submit for reimbursement of their personal vehicle mileage to/from the meeting venue or their home airport as calculated using a mapping program (such as Google Maps). Mileage will be reimbursed at the current IRS rate. For any mileage expenses, a screenshot of a mapping program (i.e. Google/Apple Maps) must be provided with both addresses and the number of miles displayed. Mileage will be reimbursed for 200 miles each way (400 miles total.)
- Mileage for a personal vehicle may be reimbursed for company-related travel exceeding 30 miles round trip when it is the most cost-effective and reasonable option.
- Policy does not speak to this but we would key off of employee policy re: personal mileage reimbursement at IRS rate.
- Permitted for distances less than 400km/250mi.
- 250-mile radius or 4 hours driving time.
- Use of personal vehicle for ground transportation is allowed without a mileage cap and is reimbursed at the IRS mileage rate but not reimbursed for gas.
- We allow HCP driving him/herself to the Company educational event. We do not reimburse for fuel. Instead, we can reimburse for mileage and parking.
- Personal vehicles may be used, and mileage is reimbursed for travel to/from designated location at the



IRS rate in place at the time mileage is incurred.

- Personal vehicles permitted with no cap.
- Our policy does not include guidance on use of a personal vehicle.
- We permit personal vehicle for ground transportation.
- Permissible to use personal vehicle.
- Yes.

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



2023, 2024, & 2026 Comparison

(24 respondents in 2023, 37 respondents in 2024, 47 respondents in 2026)

Utilization of IRS Method	2023 Responses	2024 Responses	2026 Responses
Yes	87.50%	86.16%	87.23%
No	12.50%	10.81%	4.26%
N/A	0%	0%	8.51%

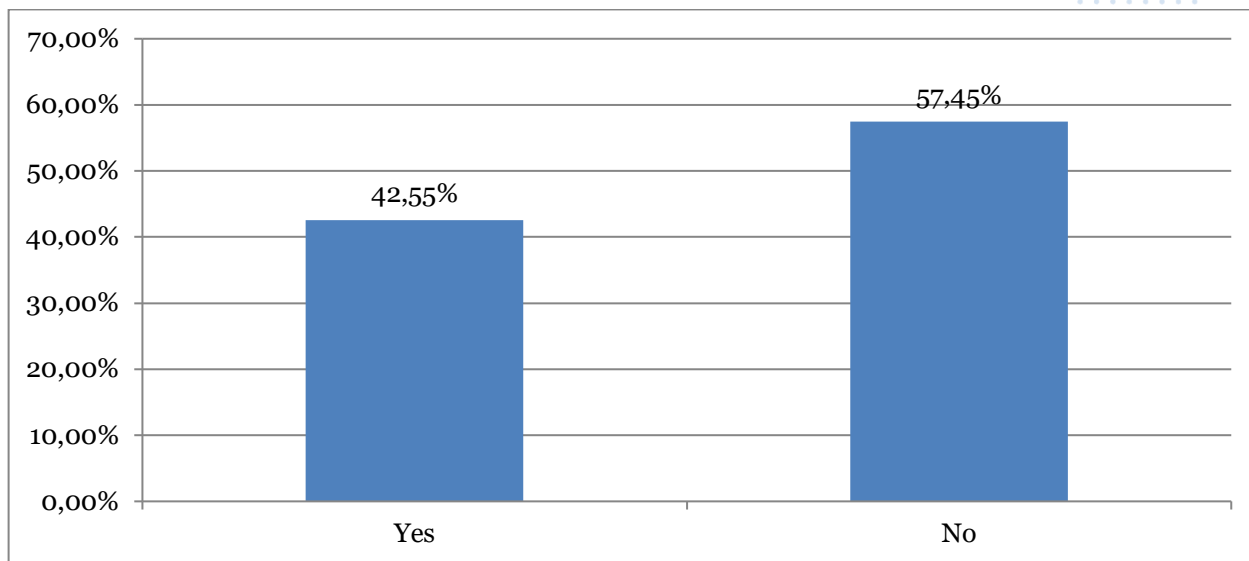
Comments:

- For U.S.-based reimbursement we follow applicable IRS reimbursement guidelines. For engagements outside the U.S., reimbursement is provided in accordance with the equivalent local tax authority regulations.
- We only reimburse mileage and parking only when local regulations accept it. We do not reimburse gas.



- Mileage only.

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



2024 & 2026 Comparison
(37 respondents in 2024, 47 respondents in 2026)

Allow HCPs to Book Travel Directly	2024 Responses	2026 Responses
Yes	40.54%	42.55%
No	59.46%	57.45%

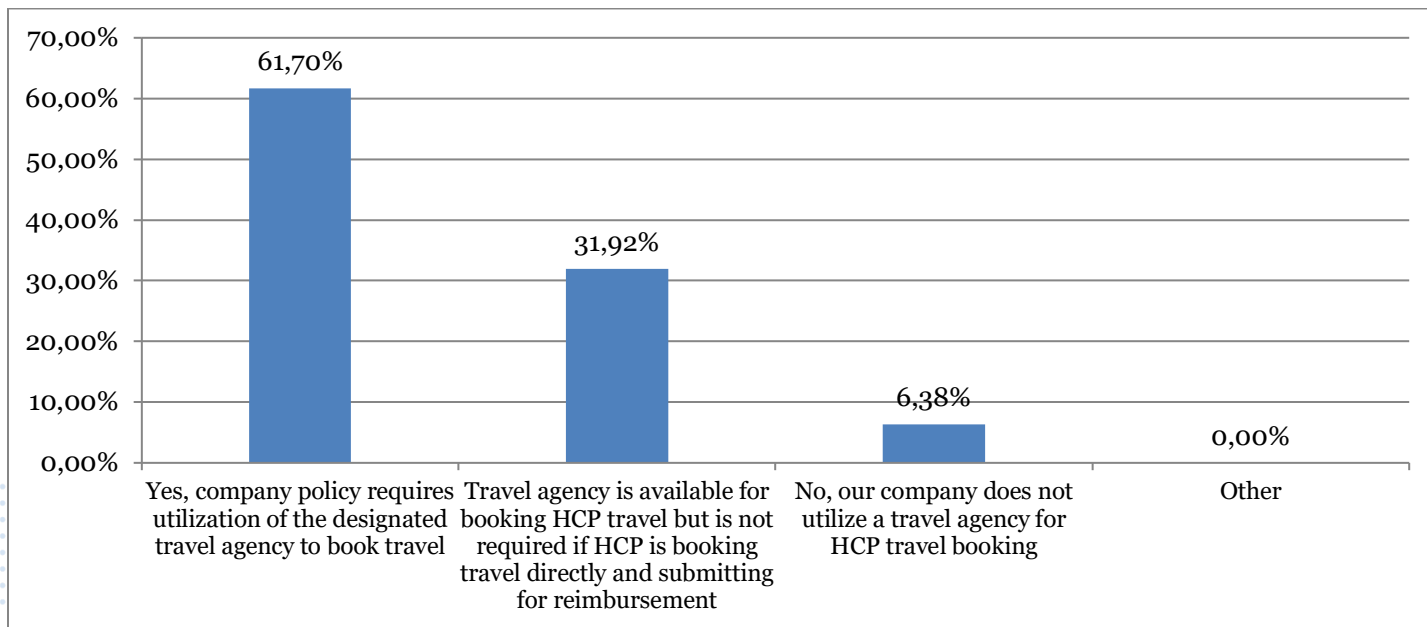
Comments:

- Use Company’s preferred travel management company for HCP/GO travel (air, hotel and ground transportation) where available and applicable. Only on a case-by-case basis we allow that the HCP books directly and we reimburse.
- Travel and lodging should be booked and invoiced through an approved company travel agency. Any travel not booked through a company travel management company should receive prior pre-approval.
- Case-by-case basis. We allow for more flexibility for international HCPs.
- May be permitted case by case if required by HCP's employer.
- Only by exception and pre-approved by the company.
- Not without approved exception in advance.
- Compliance officer processes all request.
- Only with pre-approval.
- All approved travel and accommodation for HCPs and Public Officials, except for most ground transportation, must be arranged for by team members responsible for event management.



- The HCP books travel directly with our travel agency and the costs are immediately charged to the organizing business department or medical education.
- All flights must be booked through the Company travel department.
- Travel must be booked through corporate travel partner.
- They must use our travel agent.
- It's not preferred, but if it occurs, reimbursement is not denied. However, if they book a class outside of policy, they are only reimbursed according to policy (i.e., if they bought a first class ticket, they are reimbursed what a coach ticket would have cost).
- Most travel is booked by company personnel but in some circumstances the hcp books travel and submits for reimbursement. We only reimburse based on our policy limits which are communicated to the HCP in advance.
- We prefer for the HCP to use our travel agent to book travel, but we allow travel to be booked by HCP if within policy limits.
- Any travel booked directly needs to be supported by receipts in order to be reimbursed.
- It is preferable for our company to book travel, but it is not strictly required.
- Typically, the Company books the travel on behalf of the HCP.
- But encouraged to book through company travel agents.
- Only on very limited circumstances.
- We allow both.

23. Does your company utilize a designated travel agency for booking HCP travel?



Comments:

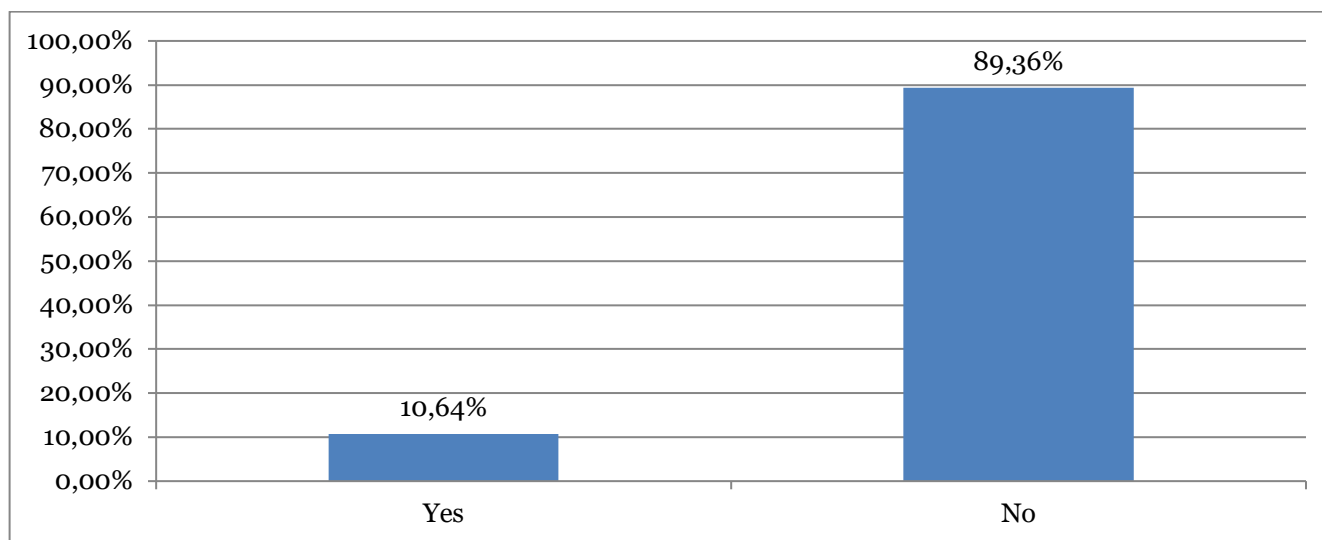
- We strongly encourage use of the designated travel agency but will allow HCPs to book directly and



submit for reimbursement. Reimbursed only up to what company would have paid had the HCP booked and ticketed through designated travel agency.

- Travel agency is generally required per sourcing policy, but exceptions are permitted at an employee’s discretion.
- If HCP self-booking, policy requires preapproval of expenses.
- All travel is handled by in-house Travel Department.
- Compliance officer assists with booking.

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



2023, 2024, & 2026 Comparison

(24 respondents in 2023, 37 respondents in 2024, 47 respondents in 2026)

Assistance of Companion Travel	2023 Responses	2024 Responses	2026 Responses
Yes	8.30%	8.11%	10.64%
No	91.7%	91.89%	89.36%

Comments:

- Our travel agency should not assist with booking for a companion.
- Spouses or guest are NOT allowed.
- HCP is required to book that travel on their own and ensure there is no overlap in personal meals and expenses.
- Not stated in our travel and lodging policy.



25. Does your company policy permit sales-employee-involvement in arranging for HCP travel? (e.g. sharing a rideshare)

Responses:

Level of Travel Assistance:

- Company personnel, including Sales personnel and leadership, may not book or expense airfare or lodging on behalf of an HCP but may assist with arrangements through the travel agency. Sharing an Uber or taxi would be permissible.
- If there is a legitimate business need, we are careful not to cover extravagant or unnecessary travel and lodging expenses that could be used or seen as attempts to improperly influence HCPs to purchase or use our products.
- This is allowed only after the selection to engage is made by a non-sales role. Logistics can be managed by sales personnel after engagement decisions are finalized.
- Permissible when it is the most logical, reasonable option. Must be tracked correctly for transparency reporting.
- If it makes sense for the sales team to be there it is permitted and must be expensed.
- Yes, as sometimes the Sales, Marketing, Medical employees are accompanying the HCP.
- Yes - prefer ride share when possible with our company employee expensing report.
- Yes. Employees are required to list HCP attendees in expense report.
- Yes, sales colleagues are allowed to coordinate logistics.

Sharing ground transportation when travelling to the same event:

- Sales employees are not permitted to arrange any HCP travel or rideshare; they can only share a ride if the employee is also utilizing the ground transportation rideshare.
- Sales employees are not allowed to arrange travel for HCPs. Ridesharing is permitted to venue if sales employee is staying at the same hotel.
- Sales employees are not permitted to arrange Airfare, hotel or most ground transportation. Sharing a rideshare is permitted.
- Sharing a rideshare is fine, but we do not permit for the sales employee to pick up or drop off HCP in the employee car.
- Yes. Commercial Organization associates can share a ride with an HCP. It needs to be declared in Concur.
- For ride share or picking up an HCP; however, does not allow sales to arrange airfare or hotel.
- A rep wouldn't be prohibited from sharing a car with an HCP or bringing them to an event.
- It is permissible for HCP attendees and an internal worker to share ground transportation.
- HCPs do not share rideshares with sales employees and sales employees do not arrange HCP travel.



Arrangement of local transportation:

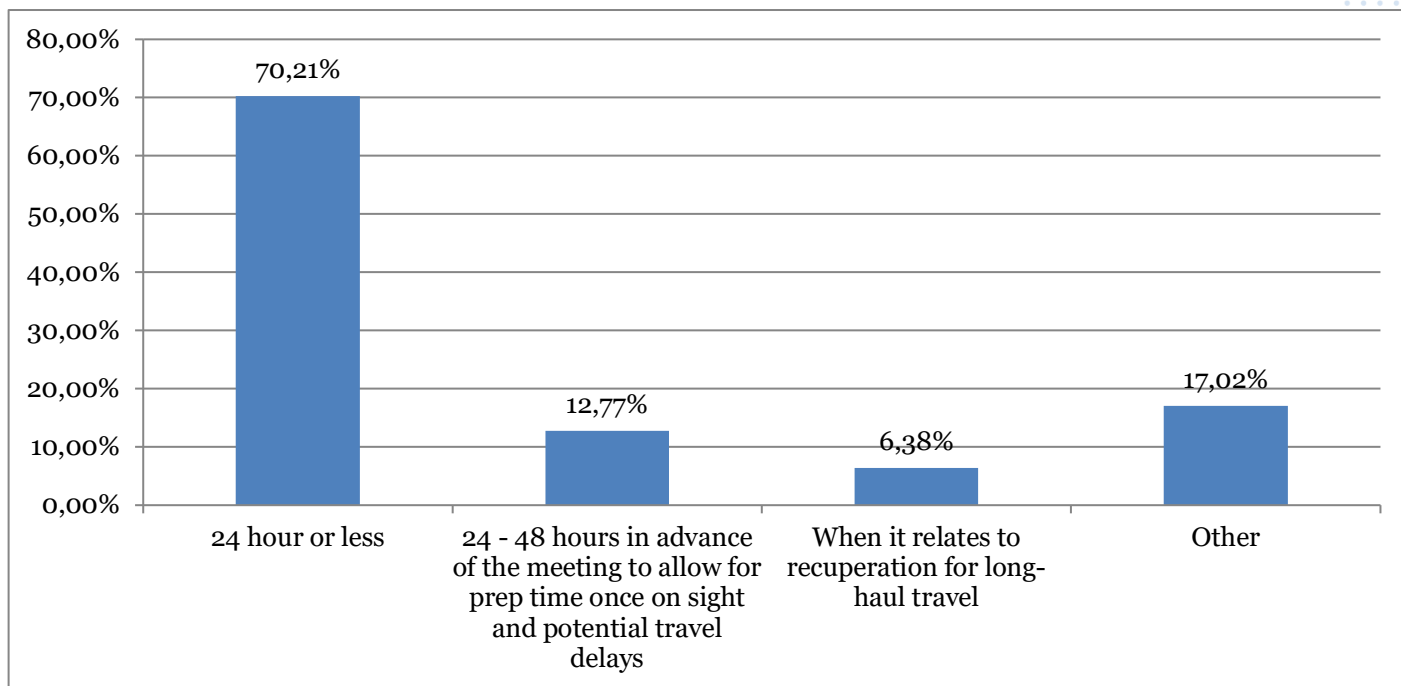
- We allow sales to arrange local ground transportation for HCPs. All other travel and accommodation, must be arranged for by team members responsible for event management.
- They are only permitted to assist with the arrangement of local travel. Sales reps are not permitted to book train or air travel or to book hotels.
- Only in exceptional cases where due to the location of the event it is required a local person to offer transportation (not applicable in US).
- Only for ground transportation. Must be submitted as an HCP expense.
- For local travel only (e.g., rideshare from hotel to service location).

Additional Comments:

- Sales personnel—except for Sales Training personnel—are not permitted to book travel or lodging on behalf of an HCP.
- No, our professional education team is responsible for coordinating all travel with the HCP.
- Prohibited for travel and lodging unless specifically approved.
- Sales employees are prohibited from selection and management of HCP relationships.
- Sales is only involved in HCP travel for site visits.
- HCPs handle their own travel.
- Our company policy is silent on sales-employee-involvement in arranging for HCP travel.
- Not addressed in policy, has not been an issue.
- Our policy does not address this situation.
- We don't specifically address in policy.
- N/A - not stated in our policy.



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



2024 & 2026 Comparison

(37 respondents in 2024, 47 respondents in 2026)

Arrival / Departure Policies	2024 Responses	2026 Responses
24 hours or less	83.78%	70.21%
24 – 48 hours in advance of the meeting to allow for prep time on sight and potential travel delays	16.22%	12.77%
When it relates to recuperation for long-haul travel	16.22%	6.38%
Other	10.81%	17.02%

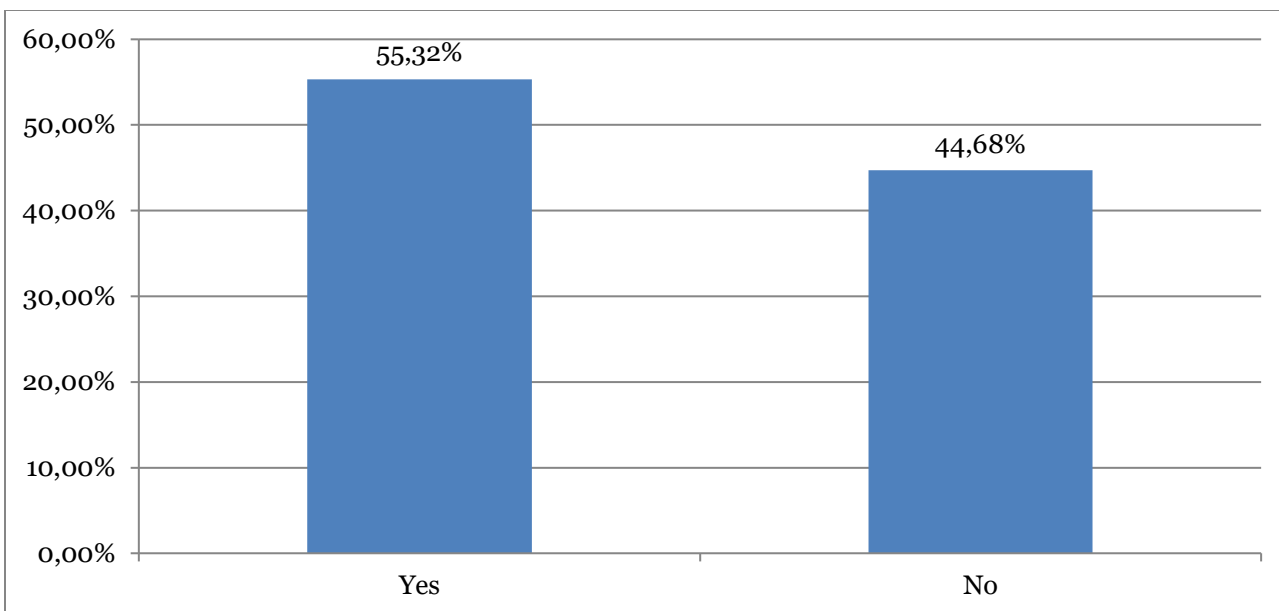
Comments:

- Travel and accommodation offered must be tailored to the duration of the event. In general, we do not pay for extra nights of accommodation. For flight itineraries where the HCP cannot reach their destination by 11:00 PM local time, we may pay for one additional night of accommodation.
- In general, it is expected that the arrival will be the night before the start of an event and departure will be on the last day of the event. Early check-in or late check-out can be arranged and paid for when required for participation in the event
- Travel and lodging arrangements must be limited in duration to the closest in time and in location to the Company program or meeting for which the HCP is traveling.



- No specific time is listed - policy states the arrival and departure to a meeting location shall be the closest in time and location.
- Closest in time, closest in location to the event for which travel is required for business need.
- Travel must be close to actual service date, extended stays need approval.
- Travel should fall within a reasonable timeframe before and after the meeting or event, generally within 24 hours to ensure it is related to the legitimate business need.
- Typically within one day or whatever is reasonable according to the needs of the meeting. Not a strict hourly timeline.
- HCP may arrive no greater than one calendar day in advance of meeting and must depart no greater than one calendar day after it ends.
- We permit arrival the day before the program begins and leave the day after the program ends.
- HCP can arrive the day before the event starts and can leave the day after the event ends
- One day for domestic programs; Two days for international programs.
- 1 day prior and 1 day post are permitted.
- More than 24 hours only by exception.
- HCP would absorb any additional costs for flying in early or leaving later. We pay for equivalent of what airfare would be to fly in and immediately fly out for the event.
- It is assessed on a case by case scenario and international travel may allow time due to jet-lag.
- The night before the engagement and/or the night the engagement concludes.
- We do not have a set policy for this.
- This has not come up.

27. 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, & 2026 Comparison

(24 respondents in 2023, 37 respondents in 2024, 47 respondents in 2026)

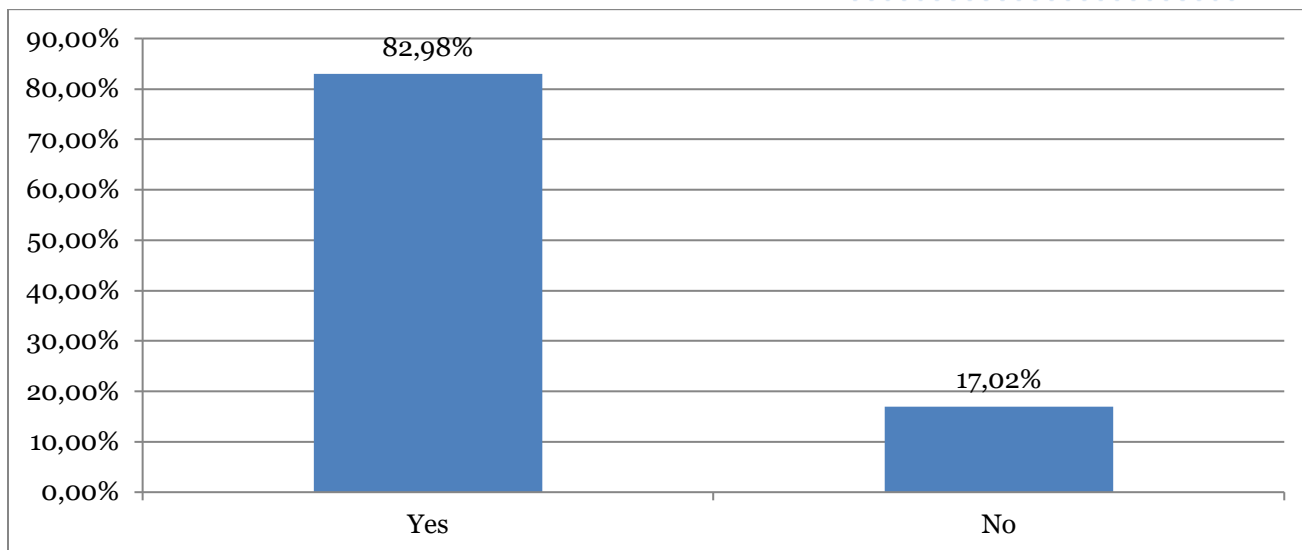
Limitation of Bookend Travel	2023 Responses	2024 Responses	2026 Responses
Yes	66.70%	67.57%	55.32%
No	33.30%	32.43%	44.68%

Comments:

- Our company policy doesn't directly address bookend travel, however policy states the Company may not pay for an HCP's personal travel. Since we control HCP booking through a designated travel agency, when such requests are submitted, they are reviewed by Compliance and decided on a case-by-case basis.
- Travel expenses are limited to expenses for a direct itinerary to and from the HCP's or Public Official's primary place of residence and the location of the meeting or event, unless pre-approved by Compliance.
- The general rule requires the flight originates where the HCP lives and the return flight shall be the same. Exceptions are managed on a case-by-case basis.
- Assessed on case-by-case scenario in relation to extenuating circumstances and cost could not exceed economy rate from originating airport.
- Deviations should be arranged and paid for by the HCP or pre-approved by Compliance.
- Airport deviations are generally reviewed by Compliance if requested.
- Evaluated on a case-by-case basis as need arises.
- Would need approval.
- Must be the same cost as return flight and documented. If it's higher cost, the company will be the original flight and HCP must contact the travel agent to change the flight. All costs to HCP.
- Company will only cover cost of travel equal to what would have been spent to fly HCP back to originating airport on our proposed return date.
- Alternate travel must be within the range of the cost of roundtrip travel that would have been booked.
- Company will not pay any additional costs resulting from an HCP's personal travel deviation.
- Will pay only what normal ticket would be home.
- We offer transportation from and to the location home/ practice of the HCP. If the HCP requests a return to a different destination he/she has to arrange by himself.
- Generally not permissible.
- Travel should fall within a reasonable timeframe before and after the meeting or event, generally within 24 hours to ensure it is related to the legitimate business need.
- Flights booked must be directly related to locations where services are provided.
- No, but must be reasonable/justified as determined by Ethics & Compliance.
- This has not come up.



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



2023, 2024, & 2026 Comparison

(24 respondents in 2023, 37 respondents in 2024, 47 respondents in 2026)

Limits on Unrelated Extended Stays	2023 Responses	2024 Responses	2026 Responses
Yes	83.30%	75.68%	82.98%
No	16.70%	24.32%	17.02%

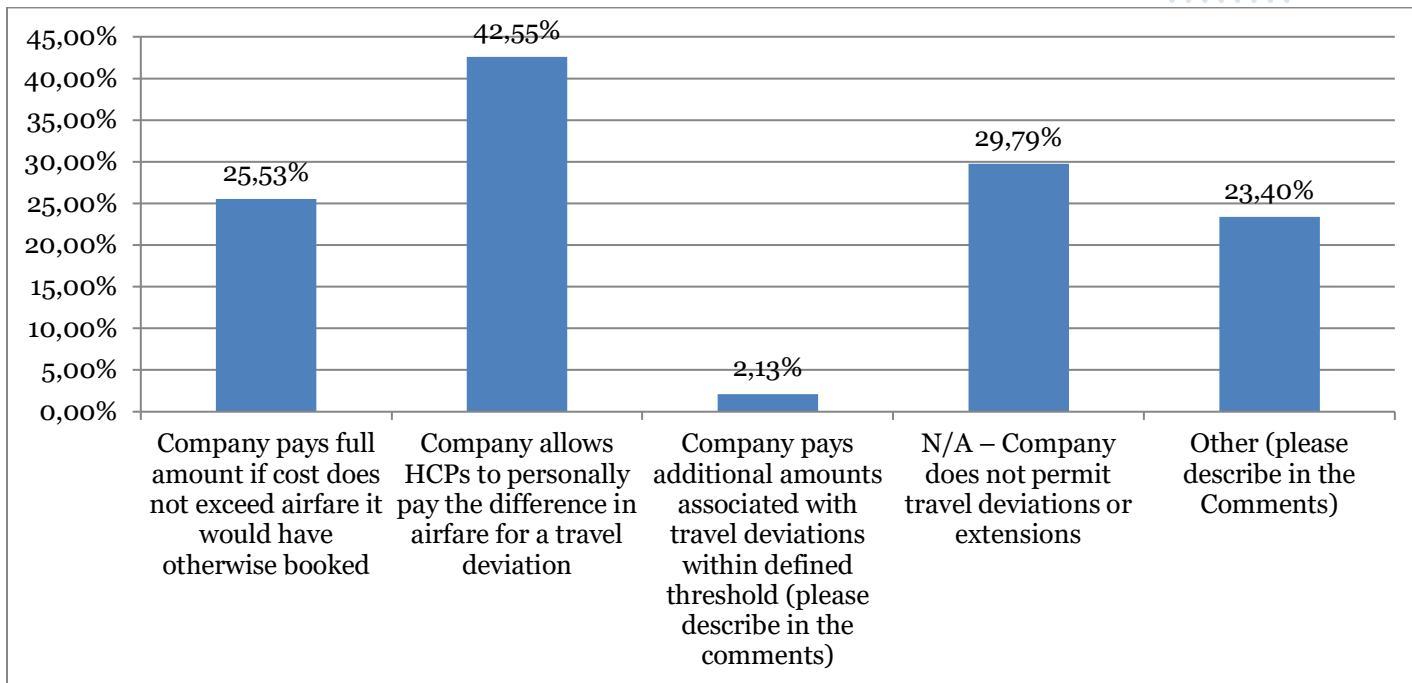
Comments:

- Travel and lodging costs will only be paid for or reimbursed for the fewest number of days required to attend the event or provide services at the event. We may book changes to travel/lodging for extended stays or other personal reasons; however, the HCP must pay for any increase in cost or associated fees.
- Extended stays are at the cost of the HCP and they are responsible for booking those extensions. We only book travel for the event we need them for; they would need to adjust their flight, hotel, transportation, etc. for any extended stays and book the cost on their personal card.
- If the HCP elects to extend the stay pre-meeting and/or post-meeting required dates, the HCP must assume the cost difference in airfare and all other additional expenses.
- All costs related to the change or extension, including additional airfare, booking or change fees, and extra nights of accommodation, shall be paid by the HCP.
- Company may not pay for an HCP’s personal travel. HCPs who choose to extend travel dates to allow for personal travel must do so at their own expense.
- Modifications or extensions to travel and accommodations that exceed the dates necessary to perform the services are completely covered by HCP.
- Company will not cover any additional expenses (hotel, meals, transportation, car rental etc) associated with any purpose/extended stay.



- But the company cannot incur any additional costs and we are only responsible for those associated with the legitimate services provided.
- Flights must be booked specifically for dates services are provided. HCP may change directly with airline at their own expense.
- Company will not pay for HCP travel related to extended stays outside of the business purpose of the program.
- Company books travel and HCP is responsible for changing the flight for any extended stays at their own cost.
- HCP is required to pay the increase in costs/fees for extended stays unrelated to the business purpose.
- There must be no incremental cost for any extended stay unrelated to the business purpose for travel.
- Company will not pay any additional costs resulting from an HCP's personal travel deviation.
- HCPs are responsible for booking and paying for any lodging unrelated to the business event.
- They are not allowed. Exceptions are managed on a case-by-case basis.
- Cannot extend stay without compliance approval.
- Travel should fall within a reasonable timeframe before and after the meeting or event, generally within 24 hours to ensure it is related to the legitimate business need.
- Arrive within 1 day of the event start date and depart within one day from the end date of the event.
- Our reimbursement is explained to individual prior to event, in writing.
- Our policy does not allow facilitation or payment for extended stays.
- Personal travel after an engagement is not reimbursable.
- Extended stays not covered or reimbursed.
- Extended stays are strictly prohibited.
- Not allowed to extend stay.
- At HCP's own expense.
- We do not allow this.
- No extended stays.
- Not permitted.
- Not allowed.

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



2024 & 2026 Comparison

(37 respondents in 2024, 47 respondents in 2026)

Permit Personal Travel Deviations	2024 Responses	2026 Responses
Company pays full amount if cost does not exceed airfare it would have otherwise booked	24.32%	25.53%
Company allows HCPs to personally pay the difference in airfare for a travel deviation	64.86%	42.55%
Company pays additional amounts associated with travel deviations within defined threshold	2.70%	2.13%
N/A – Company does not permit travel deviations or extensions	29.73%	29.79%
Other	5.41%	23.40%

Comments:

- Company may not pay for an HCP’s personal travel. HCPs who choose to extend travel dates to allow for personal travel must do so at their own expense. Since we control HCP booking through a designated travel agency, when travel deviations or extensions are requested, they are reviewed by Compliance and

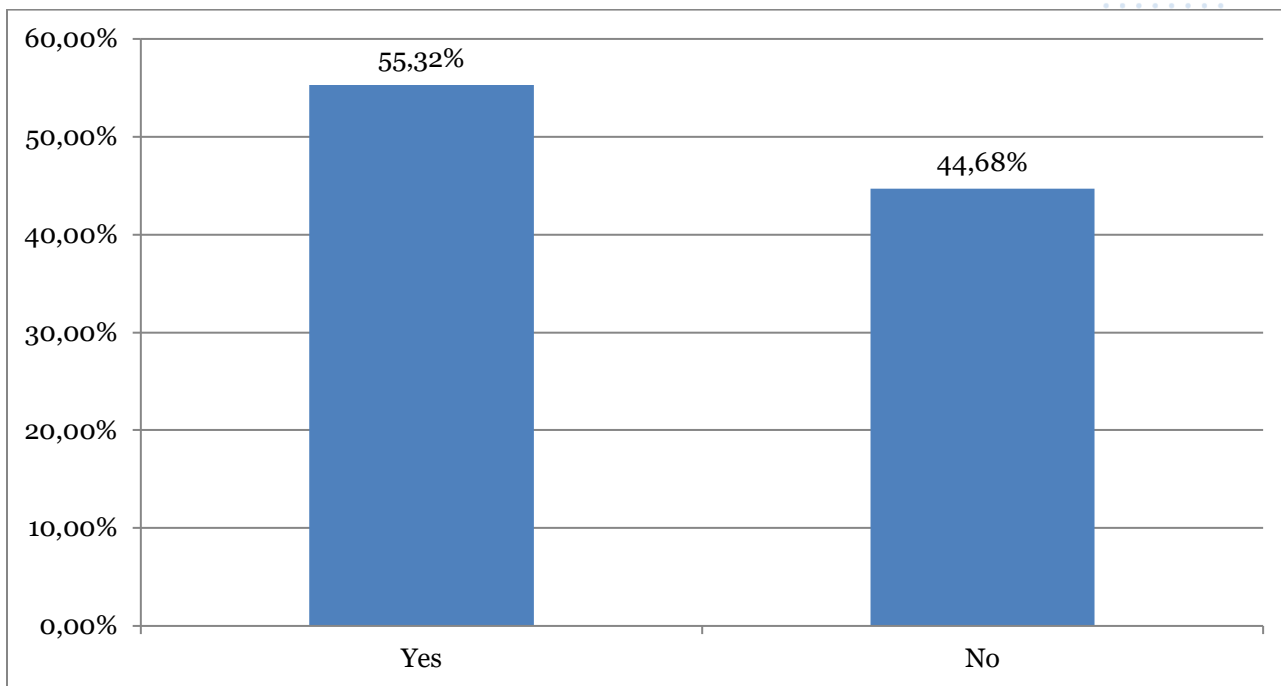


decided on a case-by-case basis.

- Reviewed on case-by-case basis for extenuating circumstances related to religious accommodations, medical reasons, or other legitimate business rationale. Would not exceed cost of airfare that would have otherwise been booked.
- HCP would be responsible for flight segments that exceed itinerary requirements. Departure or return from another city reviewed on case-by-case basis and may be allowable depending on need.
- It is not permitted and can only be allowed by exception analyzing case-by-case.
- Generally not permitted but exceptions evaluated on a case-by-case basis.
- We may accommodate on a case-by-case basis.
- Would handle on case-by-case basis.
- Full airfare paid for, provided that incurs no additional cost related to the change or extension. All costs related to the change or extension, including additional airfare, booking or change fees, and extra nights of accommodation, shall be paid by the HCP.
- Any request for travel outside of the approved program dates must be coordinated by the HCP with the airline/hotel/ground transportation supplier directly and HCP should personally pay all associated change fees/fare differences on their own.
- While generally prohibited, depending on factual circumstances, the company may at times pay for the full amount when there is no difference in cost, and/or allow the physician to pay the difference.
- Modifications or extensions to travel and accommodations that exceed the dates necessary to perform the services are completely covered by HCP.
- The company does not permit and will not book travel and accommodations with knowledge that HCP intends to extend stay.
- HCP must change travel through corporate travel partner and pay for any changes.
- HCP can change the flights on their own at their own expense.
- Flexibility is allowed for travel deviation as long as the cost is reasonable.



30. 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.



2024 & 2026 Comparison

(37 respondents in 2024, 47 respondents in 2026)

Pay for HCP Marketing Related Travel	2024 Responses	2026 Responses
Yes	62.16%	55.32%
No	37.84%	44.68%

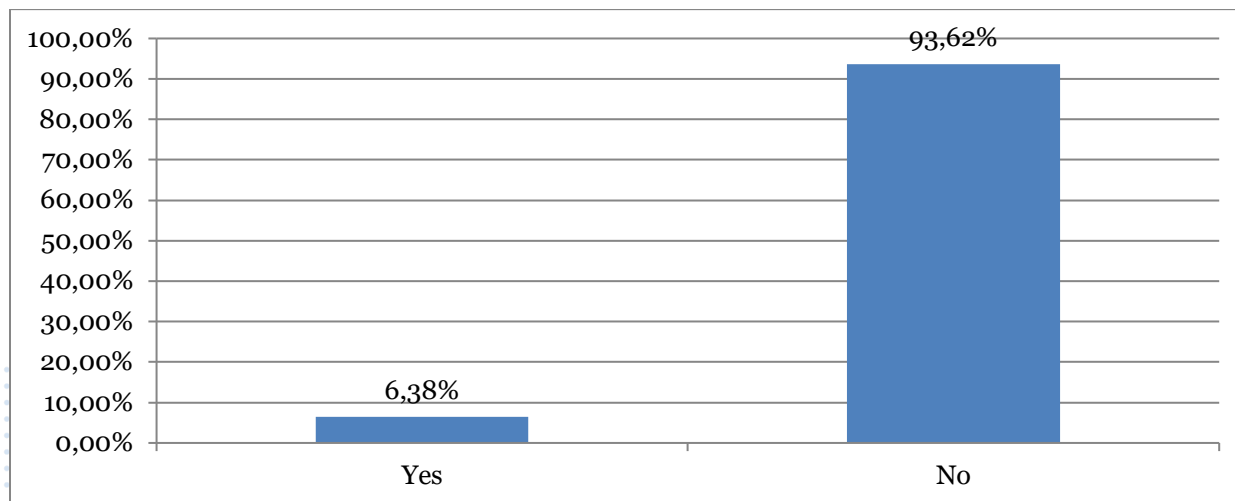
Comments:

- 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.
- Yes — only in the limited circumstances listed in policy (hired as a promotional speaker, to attend plant tours, and to attend a product demonstrations at a Company facility or a centralized location such as a reference site), and only when travel is reasonable, necessary, and supported by an objective, legitimate reason that supports the HCP’s in-person attendance.
- We may cover travel expenses only where there is an objective, legitimate reason that supports the HCP’s in-person attendance (examples include a facility tour or a demonstration of capital equipment that cannot be easily transported).



- Show Site Visits, Commercial Sales Meetings for training purposes, Speaker Program (Speaker only).
- Only if there is a service requested of the HCP. There must be a legitimate business need.
- Marketing activities are often tied to services - e.g. speaking at a conference.
- Speaking at Marketing Events, Scientific Advisory Meetings, Consulting.
- HCP attendance costs to marketing promotional events is reimbursed.
- For presentation on our products as a consultant.
- Peer to peer meetings, speaker bureau activities.
- When the HCP is hired as consultant / speaker.
- Filming for media/social media engagements.
- We pay if they are an HCP consultant.
- Educational activities.
- Company will pay for travel related to programs that have components of market research with a valid business purpose and Compliance review and approval.
- There must be a legitimate, bona fide business purpose for the expense, as documented and pre-approved by Compliance.
- Travel and lodging costs will only be paid for or reimbursed for the fewest number of days required to attend the event or provide services at the event. We may book changes to travel/lodging for extended stays or other personal reasons; however, the HCP must pay for any increase in cost or associated fees.

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



2024 & 2026 Comparison

(37 respondents in 2024, 47 respondents in 2026)

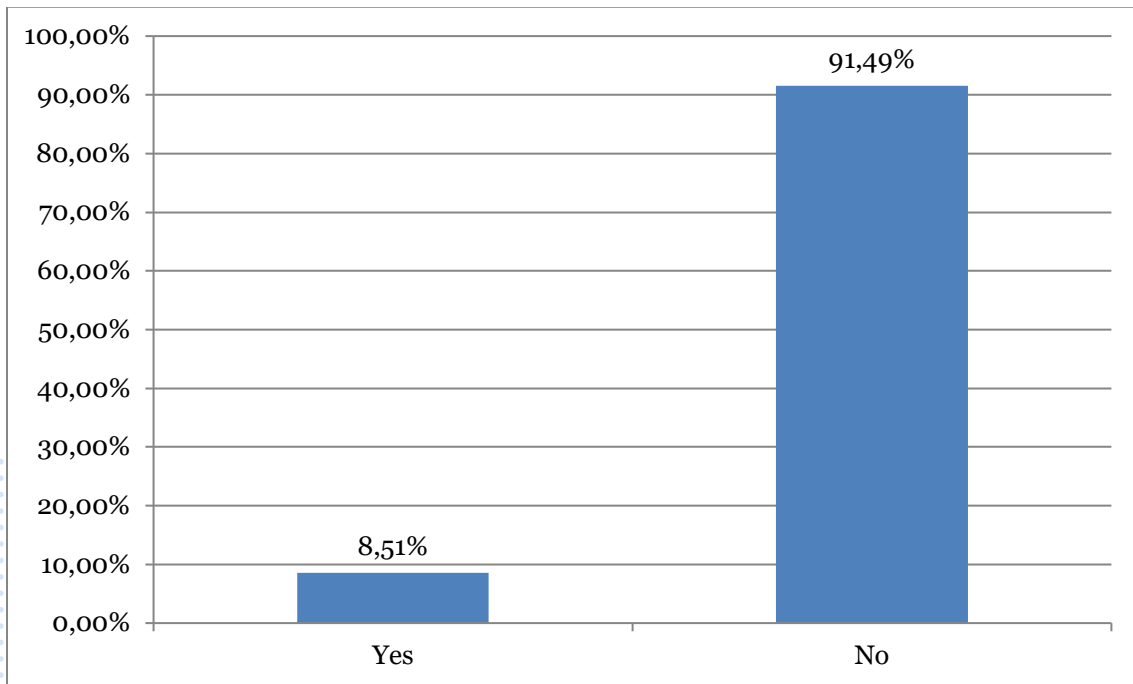
Permit HCP use of Company Private Aircraft	2024 Responses	2026 Responses
Yes	8.11%	6.38%
No	91.89%	93.62%

Comments:

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

- Compliance team conducts a totality of the circumstances test factoring in determining whether to approve.
- Written justification and VP approval is required.
- Subject to Chief Compliance Officer approval.
- Not addressed in policy but has not been an issue.
- Have not incurred this scenario.

32. 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).



2024 & 2026 Comparison

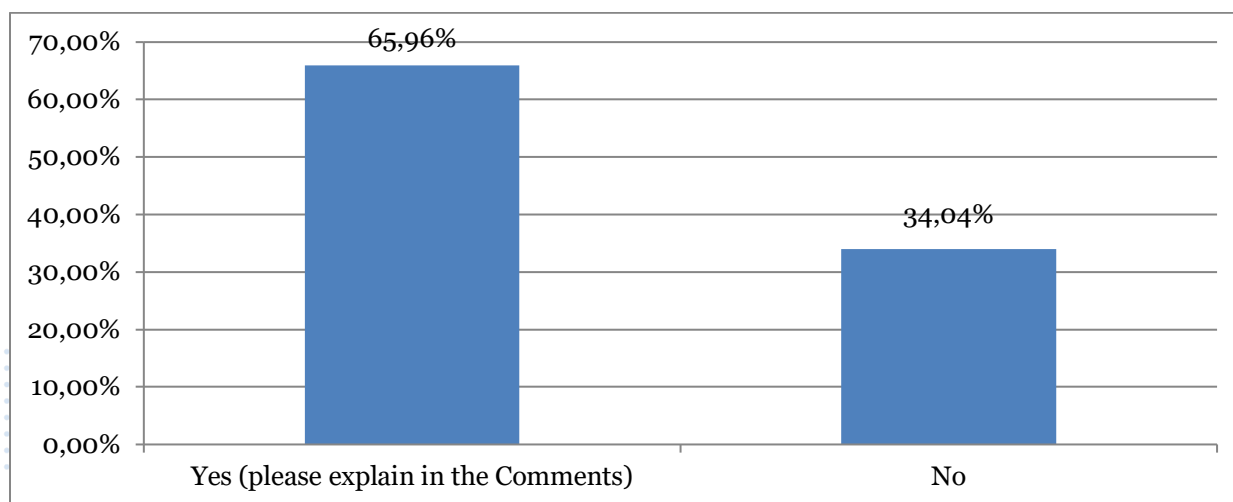
(37 respondents in 2024, 47 respondents in 2026)

Compensate HCP for use of personal Private Aircraft	2024 Responses	2026 Responses
Yes	13.51%	8.51%
No	86.49%	91.49%

Comments:

- Up to the value of an Economy class fare, which may include Economy Plus or Premium Economy, on a commercial flight to the same destination.
- We have had this one recently with a board member who is an HCP. We pay the cost of a comparable commercial flight.
- This is rare but if allowed, fuel is reimbursable, but it cannot exceed the comparable commercial flight.
- We have never encountered this; however, policy requires HCP travel be booked through Company’s travel department.
- Not addressed in policy but has not been an issue.
- Don't allow for private aircraft.
- Have not incurred this scenario.
- Have not encountered this.
- This has not come up.

33. Do any of your company’s HCP travel policy requirements vary depending on the country (outside of country requirements)?



2024 & 2026 Comparison

(37 respondents in 2024, 47 respondents in 2026)

Policy Variation by Country	2024 Responses	2026 Responses
Yes	62.16%	65.96%
No	37.84%	34.04%

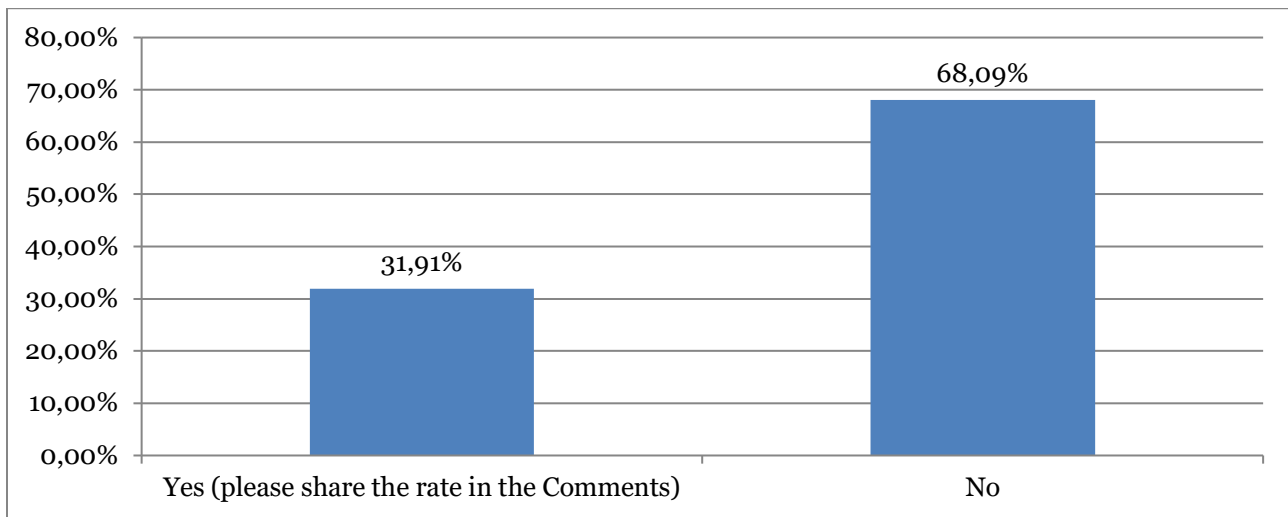
Comments:

- OUS HCP travel policies include local meal limits based on country, additional travel safeguards, and business class flights allowable if flight over 6 hours.
- HCP travel requirements may vary by country to ensure compliance with applicable local laws, industry codes, and transparency regulations.
- The HCP travel policy applies globally; however, there may also be country specific requirements that are more restrictive.
- We follow the requirements of each country the HCP is from, e.g., the US differs from France which differs from India.
- The policy incorporates local requirements such as the French CINL Caps on reimbursable travel.
- We follow a global policy, but local policies apply when they are more stringent.
- On top of local regulations, we also get alignment with local industry codes.
- Country policies reflect local law and trade association requirements.
- We follow country specific guidance for international HCPs.
- Each country has their own policies based on local laws.
- more strict requirements according to local law.
- Additional lodging and meal restrictions for certain countries, aligned with industry codes. Regional variations in travel and preparation time methodologies.
- In Europe, South Korea and other selected countries, local rules supersede the global policy, as applicable.
- In Europe, business is not allowed if it is an international flight, as flights are short from one country to another.
- EMEA and APAC regions have separate policies to address any country-specific rules.
- EMEA has separate policy.
- Varies depending on region.
- By region and country.
- Example; Business class is not permitted for HCPs in accordance with our Code.
- We have market specific requirements that are budget driven based upon country.



- The only variation is the difference in travel class for longer, international flights.
- Full reimbursement within US, \$1000 reimbursement for flight out of country.
- Business travel for segments over 5 hours for international flights only.
- Country-specifics are handled within Country Supplements.
- Global policy applies but specific US policy also in place.
- Exceptions would be evaluated on a case-by-case basis.

34. Does your company policy have a maximum hotel rate for standard HCP travel? (If yes, please share the rate in the Comments).



Comments:

- Not a specified monetary rate, However, venues should be commonly used by industry for business travel without public perception of extravagance. Luxury, vacation/resort venues (such as spa, hot spring, ski, golf, gambling, cruise ships, etc.) are inappropriate in most circumstances and may not be provided.
- No, for the US and APAC, but it cannot be resort, extravagant or luxurious, it needs to be appropriate and a "business" hotel. For Europe, maximum hotel rates are in place.
- No, but it has to be a business-class hotel and a "reasonable" rate for the area.
- The lodging has to be appropriate and reasonable.
- Must be modest and reasonable.
- Must be modest and reasonable.
- Don't allow luxury resorts, etc.
- \$400/night max.
- \$300 per night excluding tax. Exceptions of \$400 per night in NY an SF.



- Lodging exceeding \$300 requires additional review via Sourcing to ensure it is not a resort or luxury hotel and validate that it is the best option for meeting parameters.
- Standard room not to exceed \$300, or depending on location for expensive metro areas.
- Guideline is \$300 per night before taxes and fees.
- \$350/night, keys off of employee policy, should be reasonable and modest for the market.
- Base rate of \$180, \$300 for high-cost cities. Exceptions require approval.
- The allowed threshold over a standard hotel room rate at a three or four star rated hotel is \$250 maximum, or the equivalent amount in the employee's home country currency.
- If a company preferred hotel is not available, the maximum rate at any hotel property must not exceed \$250 USD (or local equivalent) per night, excluding taxes.
- \$250.
- Mirrors employee rate limits \$130-\$150 depending if breakfast included.
- Four stars or less but no dollar amount maximum rate.
- Hotel stays align with our overall T&E policy.
- It varies depending on the location.
- This depends on the country.

35. Does your company policy for HCP travel vary for high-cost cities? Please describe the geographic limits, including how you established the geographic areas that are subject to a higher spending limit (e.g., 50 mile radius from certain cities – identify the relevant cities).

Responses:

19 Respondents noted that they do not have special policies for high-cost cities and 5 Respondents noted that the question is N/A. Some additional details:

- No variations in policy for high-cost cities. Meal limits and other travel-related policies and procedures apply.
- No. Booking is made by the Company, not HCP and hotel must be "business class."
- No, the HCP follows the company T&E guidelines for travel.
- Our policy does not vary dependent on high-cost cities.
- No policy on high-cost cities.
- No, it does not vary.

6 Respondents noted that variations are granted on a case-by-case basis. Some additional details:

- Will consider case by case exceptions in high-cost cities if accommodations are not possible within



policy limits.

- Meal limits vary dependent on city. Hotel rate exceptions may also be approved based on high-cost cities.
- One by one exceptions will be granted for cases where it is not possible to apply the standard rates.
- Yes, without geographic limits. These are considered on a case-by-case basis.
- On a case-by-case basis for HCP Meal Limits in certain cities.
- No, assessed on a case by case basis, if required.

10 Respondents noted that there are variations for hotel rates in high-cost areas. Some additional details:

- The maximum daily amount for hotels in certain high-cost locations, including Chicagoland (includes suburbs), Boston, Dublin, Frankfurt, Hong Kong, Las Vegas, London, Miami, Milan, Munich, New York, Paris, Rome, San Diego, San Francisco, San Juan (PR), Shanghai, Singapore, Tokyo, Washington DC and Zurich, is \$400 USD (or local equivalent), excluding taxes.
- Yes, in certain countries like India and China the hospitality rates may vary for Tier I and Tier II cities.
- Yes, accommodations are determined based on appropriate spend for the market in question.
- Yes - specific cities (New York, San Francisco, etc.) are allowed to go up to \$500/night max.
- Multiple quotes are obtained, and we book the most reasonably priced accommodation.
- Within expensive metro areas, increased hotel rates are allowed up to a certain limit.
- NYC and SF at \$400 per night.
- There are restrictions in certain cities, such as Aspen, Vail, Atlantic City, etc.
- We don't name the high cost cities, but the limit is \$300.

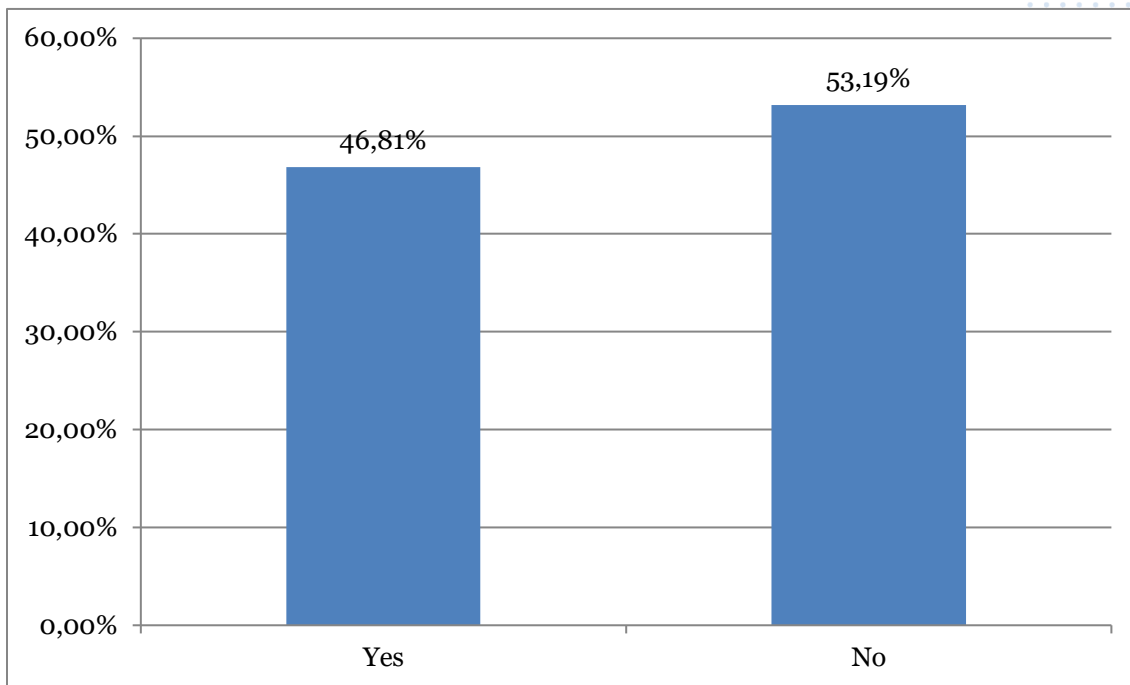
Additional Comments:

- Would find most reasonable rate
- No geographical limits.
- Meal limits vary by city, hotel limits do not. List of high cost cities: Boston/Cambridge, Chicago, D.C., Denver, Las Vegas, Los Angeles, Miami, New York City, Palo Alto/San Jose, Philadelphia, San Diego, San Francisco, Seattle.
- Increased meal limits in High-Cost Cities for hosting HCPs and Public Officials in specific cities only. Extended regions, suburbs or cities near one of the cities listed below are not considered high-cost cities.
- We have selected a approximately 20 cities across the U.S. that are high cost. Any meal within a 25 miles radius will trigger the application of the higher limit.
- HCP consultants may be reimbursed at a higher rate for meals taking place in certain designated high cost cities.



- Only meal limits. Reasonableness for lodging.

36. 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.



2024 & 2026 Comparison
(37 respondents in 2024, 47 respondents in 2026)

Permit Hotels W/Golf Courses On-Site	2024 Responses	2026 Responses
Yes	56.76%	46.81%
No	43.24%	53.19%

Comments:

- An HCP may stay at a hotel that happens to have a golf course on site, provided the hotel is selected based on legitimate business criteria (e.g., proximity to the venue, reasonable rate), not because of the golf course or other leisure features. We would not reimburse incidental expenses which would include golf fees or other leisure activities at the hotel.
- Assessed case by case. Hotels allowed must be in a location that makes logistical sense considering the location of the meeting itself, the location of speakers/trainers, etc. The hotel must also be modest in nature. Modest, typically means a four star, or four-star equivalent.
- Evaluated on a case-by-case basis. Any location that has an additional amenity, such as a golf course, must submit business justification for location and build in safeguards to limit engagement of attendees with any additional amenities.

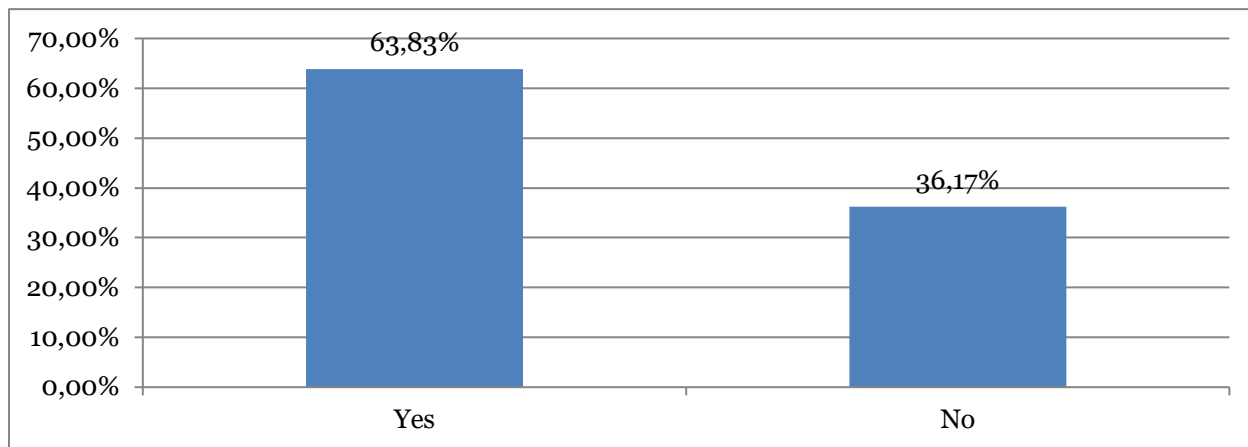


- Lodging must be selected based on legitimate business need and unrelated to presence of adjacent recreational activities. Employees must work via Sourcing to ensure selection of an appropriate and cost-effective hotel.
- If a Third-party conference is being held at a luxury hotel property, or if the event is a fee based educational event, then reservations can be made at the same property.
- This is not prohibited, but any meeting facility or hotel where HCPs will be lodged at the company's expense must be reasonable and appropriate to the business purpose.
- If a hotel has a golf course on site but is not a luxury property or resort, and is otherwise conducive to a business meeting, it would not be prohibited.
- In conjunction with third-party conferences, or location conducive for large scale meetings with appropriate justification.
- In some circumstances, if HCP is attending/presenting at National Sales Meeting and the hotel has a golf course.
- If the meetings are hosted there, but we will review agendas and will not facilitate use of recreation facilities.
- Yes, but no 5 star hotels or entertainment resorts. Unless the event is being held at that hotel/resort.
- Luxury and resort style hotels are not permitted, unless it is the meeting location.
- If part of a 3rd party congress and the hotel was chosen by congress organizer.
- If it's a reasonable option/price or if it's where the service was occurring.
- Only if pricing reasonable and event is occurring at this location.
- Only stay at golf resorts if the society picks the resort.
- If specific event being held at this venue.
- Venues should be commonly used by industry for business travel without public perception of extravagance. Luxury, vacation/resort venues (such as spa, hot spring, ski, golf, gambling, cruise ships, etc.) are inappropriate in most circumstances and may not be provided.
- We don't specifically exclude hotels with golf courses, but I can't think of an instance where we have had an event at a hotel with a golf course.
- Hotel accommodations must be modest. Entertainment, gambling, spa and resort facilities must be avoided when possible.
- Not addressed in policy, has not been an issue but would generally not be permitted to organize events at resort properties.
- Hotels associated with gambling, entertainment, spa or resort activities should be avoided.
- We do not have a rule against this, but it would be rare and depend on circumstances.
- Guidance states is to avoid venues focused on tourism, leisure, or entertainment.
- Lavish accommodation, 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.

- Luxury hotels, golf courses and mountain resorts are not permitted.
- No resorts, golf courses, Spas, or casinos.
- Golf course not dispositive. But factor in assessing overall reasonableness of the hotel.
- Depends on the event, agenda, specific details for the event.
- Caveat - exceptions may apply.
- Many hotels in our local area have golf courses on site. It is not concerning if the HCP wants to golf on their own time and at their own expense.
- Policy is silent on this topic.

37. 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.



2024 & 2026 Comparison
(37 respondents in 2024, 47 respondents in 2026)

Permit Hotels With Beach View/ Access	2024 Responses	2026 Responses
Yes	59.46%	63.83%
No	40.54%	36.17%

Comments:

- Assessed case by case. Hotels allowed must be in a location that makes logistical sense considering the location of the meeting itself, the location of speakers/trainers, etc. The hotel must also be modest in nature. Modest, typically means a four star, or four-star equivalent.
- An HCP may stay at a hotel that happens to have proximity or view to an ocean or beach, provided the hotel is selected based on legitimate business criteria (e.g., proximity to the venue, reasonable rate), not because of view or other leisure features.



- Lodging must be selected based on legitimate business need and unrelated to presence of adjacent recreational activities. Employees must work via Sourcing to ensure selection of an appropriate and cost-effective hotel.
- Our policy is silent as to ocean or beach view/access. This is not prohibited, but any meeting facility or hotel where HCPs will be lodged at the company's expense must be reasonable and appropriate to the business purpose.
- Lodging should be appropriate, reasonable in price and close to the meeting/event. Location should not be the primary attraction. Guidance states is to avoid venues focused on tourism, leisure, or entertainment.
- If a Third-party conference is being held at a luxury hotel property, or if the event is a fee based educational event, then reservations can be made at the same property.
- If a hotel has an ocean or beach view/access but is not a luxury property or resort, and is otherwise conducive to a business meeting, it would not be prohibited.
- In conjunction with third-party conferences, or location conducive for large scale meetings with appropriate justification.
- If the meetings are hosted there, but we will review agendas and will not facilitate use of recreation facilities.
- Luxury and resort style hotels are not permitted, unless it is the meeting location.
- If part of a 3rd party congress and the hotel was chosen by congress organizer.
- If it's a reasonable option/price or if it's where the service was occurring.
- In some cases, for example, conference hotel, then it might be approved.
- If specific event being held at this venue.
- Our policy doesn't address. Of course, the hotel needs to be commercially reasonable and convenient to the event location.
- There is no direct prohibition on hotels that have ocean/beach access. The policy focuses on prohibiting luxury resorts.
- Not addressed in policy, has not been an issue but would not book events at beach destinations as a matter of course.
- Hotels that have ocean or beach view/access are permitted, as long as the hotel is not a luxury or resort hotel.
- To the extent the room is reasonable and the hotel is also reasonable we do not look at access.
- Luxury hotels, golf courses and mountain resorts are not permitted.
- Yes, provided that the hotel is not luxury, or considered a resort.
- Yes, if within hotel limits and accommodations are not lavish.
- Having ocean view is fine - just not a resort type hotel.
- The Company may not organize or fund events at extravagant, luxurious, or otherwise inappropriate



venues, such as lavish resorts, popular vacation destinations, sports resorts, or theme park-style properties. Event locations must be chosen carefully to avoid any setting that could create negative public perception due to associations with leisure, recreation, or luxury.

- Lavish accommodation, 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. Specifically related to ocean/beach access or view is not mentioned in the policy.
- Evaluated on a case-by-case basis. While ocean or beach view does not automatically prevent location from being used, these locations are typically not utilized and do not fall within the definition of venues conducive to the nature of the program or close to major metropolitan airports.
- Venues should be commonly used by industry for business travel without public perception of extravagance. Luxury, vacation/resort venues (such as spa, hot spring, ski, golf, gambling, cruise ships, etc.) are inappropriate in most circumstances and may not be provided.
- Hotel accommodations must be modest. Entertainment, gambling, spa and resort facilities must be avoided when possible.
- We do not have a rule against this, but it would be rare and depend on circumstances.
- Same principle as golf—not hard and fast rules for this. Look at all factors.
- Same as question 34.
- Our company is based in Florida, so this is difficult to control. Reasonable expense that is preapproved only.
- Unless unavoidable based on the geography of location.
- We are located in a beach city, it's kind of unavoidable.
- Nothing written in our policy that limits views/access.
- Policy is silent on this topic.
- No room upgrades.

38. 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, hotel within certain distance of business meeting, 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. Some additional details are below:

- The meeting location should be easy for most people to reach and suitable for the purpose of the meeting. The Company should not hold or pay for events at expensive or inappropriate venues, such as luxury resorts, vacation destinations, sports resorts, or theme-park-style properties. Locations must be



selected carefully to avoid any place that could appear overly recreational or luxurious. Meetings that require long-distance travel should be uncommon and should only happen when there is a valid business reason to meet in that specific location, rather than choosing a place closer to most attendees or using a virtual option.

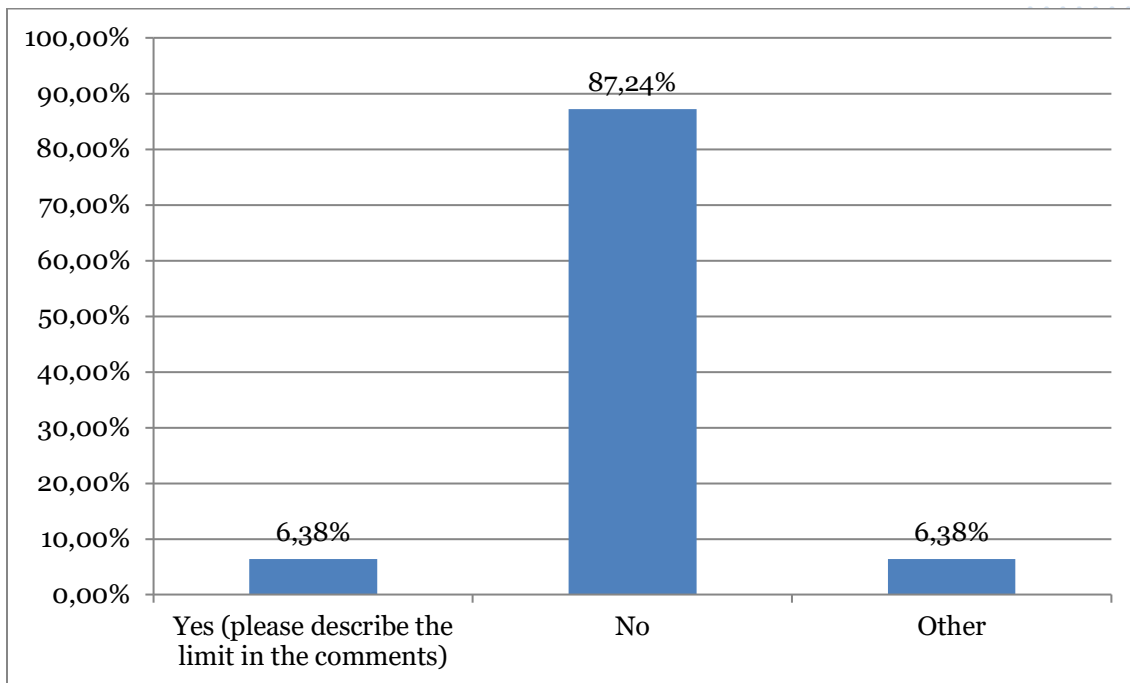
- Venues should be commonly used by industry for business travel without public perception of extravagance. Luxury, vacation/resort venues (such as spa, hot spring, ski, golf, gambling, cruise ships, etc.) are inappropriate in most circumstances and may not be provided.
- Lavish accommodation, which 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 should be appropriate, reasonable in price and close to the meeting/event. Location should not be the primary attraction. Guidance states is to avoid venues focused on tourism, leisure, or entertainment.
- Ranked 4 stars or less. Excessively luxurious hotels not permitted. Hotels associated with gambling, entertainment, spa or resort activities should be avoided.
- Luxury hotels and resorts not permitted. Company has a selection process that employees must follow to ensure appropriateness.
- Hotel accommodations must be modest. Entertainment, gambling, spa and resort facilities must be avoided when possible.
- Not written, however travel platform limits hotel selection to a mileage maximum from venue and we prohibit luxury hotels.
- Not explicitly enumerated in policy language but company-organized events are not held at luxury or resort destinations.
- We do not use hotels which are lavish, extravagant, or known principally for their entertainment purposes.
- One night lodging at a modestly priced hotel, for each day on which the speaker is scheduled to present at a program (Hyatt, Hilton, Sheraton, Westin, Marriott and Omni properties are considered acceptable). An additional night of lodging may be permitted if required by the circumstances (travel limitations).
- We specify non-lavish, no 5-star resorts. However, if part of a congress where we did not choose the hotel (and where the meeting is being held) or if in a country where safety concerns are an issue, exceptions may be made with documented approval.
- HCP must stay in accommodations approved and booked through the company only. Venues must be reasonable and aligned with the business needs of the program. HCPs booking their own travel accommodations will not be reimbursed.
- Luxury/leisure/entertainment destinations are generally prohibited unless reasonable booking options are limited in a given geography, and access to resort or activities are restricted.
- Accommodations should be selected on the basis of their convenience to the meeting or event, and not for any activities or amenities offered that are unrelated to our business.



- If a Third-party conference is being held at a luxury hotel property, or if the event is a fee based educational event, then reservations can be made at the same property.
- Hotels must be modest and reasonable. We pay special attention to events in resort/entertainment-type locations (e.g., Las Vegas) to ensure legitimate business purpose.
- No. Lodging must be reasonable and appropriate to the business purpose.
- Yes, this is documented in our T&E policy.
- Event hotel should be the preferred hotel.
- Policy is silent on this topic.
- Hotels must not be luxury or resort properties and must be reasonably located near the business event.
- Hotels with a focus on luxury/entertainment or spa/resort locations are not permissible.
- Hotels must modest and reasonable. Luxury hotels or resorts must be avoided.
- Luxury hotels are prohibited. Hotels must be considered business class.
- Luxury hotels, golf courses and mountain resorts are not permitted.
- HCPs should stay at non-luxury hotels close to business meetings.
- Luxury properties, resorts, entertainment venues, are prohibited.
- No 5-star hotels or entertainment resorts. (ski resorts, etc.)
- No casinos, sport and entertainment facilities, spas, etc.
- No resorts or AAA 5 diamond hotels are allowed.
- Notes to avoid hotels with "resort" in the name.
- Luxury and resort hotels are not permitted.
- Luxurious or resort hotels are not allowed.
- No luxury, 5 Star hotels or Resorts.
- Restricts luxury hotels/resorts.
- 5-star hotels are to be avoided.
- Luxury/resort hotels.
- No luxury hotels.



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



2024 & 2026 Comparison
 (37 respondents in 2024, 47 respondents in 2026)

Annual Spend Limit for HCPs	2024 Responses	2026 Responses
Yes	21.62%	6.38%
No	70.27%	87.24%
Other	8.11%	6.38%

Comments:

- For HCP-Sales interactions, ~ \$100 under the annual Stark non-monetary compensation limit. No specific limit on travel/meal/accommodation costs associated with consulting or speaking engagements.
- Company monitors HCP annual spend through needs assessment review and approval process. Spend must be associated with a bona fide business purpose.
- Meal limits are \$50 for breakfast and lunch and \$125 for dinner; Hotel limits \$130-\$150.
- The HCP limit is part of an overall limit on spend per HCP including honoraria.
- As applicable for local law (like France, and The Netherlands)
- On a case-by-case and per agreement basis.

