



## Physician Engagement Overview

Pioneer exists to provide innovative solutions to patients with certain diseases or conditions. Physicians provide the insight into the medical problems to be addressed and how best to address these problems with devices, instruments and biologic products. Their work is divided by function:

- 1) Design of devices;
- 2) Evaluation of design (safety, effectiveness, ease of use, cost);
- 3) Training of users and Pioneer associates to increase the ability of physicians to use the devices; and/or,
- 4) Service on Medical Advisory Boards (MAB, BAB) to assist the Company at a high level as it assesses potential products and improvements to existing products.
- 5) Presentations and meetings.

**These physician consultants are to be compensated in a way that eliminates any suggestion that payments are for any purpose other than for the requested work performed.**

To that end, Pioneer follows this protocol:

- 1) Determine projects that hold medical and economic promise;
- 2) Assign a project manager to each project. This manager is responsible for assuring consultants are conscientiously contributing and paid for actual time worked;
- 3) Assess project needs (what expertise, how many, etc.);
- 4) Obtain CVs for those who possess the training and experience required for each need (design, evaluation, training, advisory board);
- 5) Assemble the teams to accomplish the project;
- 6) Offer contracts specific to the project and tasks to be performed that clearly fall within compensation guidelines and safe harbors only after review and approval by the company's Compliance Officer (CO);
- 7) The CO shall review all requests for compensation and expense reimbursement, and shall approve or reject each payment request;
- 8) All proposed contracts and all payments shall be reviewed and a determination made by the Project Manager and CO before any contract is offered, and any payment made;

- 9) Surgeons shall not be paid for any activity while they perform surgery except during approved studies;
- 10) To assure objectivity and avoid conflicts of interest, a majority of the cases should not be performed in any study by those with a stock investment in Pioneer.
- 11) Royalties may be offered in appropriate situations to members of a design team as Developers who conscientiously contributed as defined in the consulting agreement, but not included in contracts provided to Evaluators, Trainers, or members of the Medical Advisory Board.
- 12) Requests for donations including support for studies, fellowships and others shall be reviewed by the CO and any aspect that might be misinterpreted as a bribe, kickback or rebate will result in a rejection of the request.
- 13) Payment to physicians for presentations and meetings shall be in keeping with the amount of time spent in preparation for and delivery of the presentation. It shall not provide compensation for time spent at a conference or meeting beyond the time required for the physician's presentation, and expenses shall not be paid for attendance at meetings where the physician would have attended the meeting or conference had he not been asked to make the presentation. Reasonable compensation for travel time to and from the meeting where they are presenting will be reimbursed per the terms of the agreement. Pioneer shall not pay for the expenses of any guests which accompany a physician to such presentation.