



Code of Conduct

Consultant Engagement

Pioneer Surgical Technology, Inc. is committed to legal and ethical business practices. To that end, the Ethical Statement and Personnel Manual for the company requires the utmost legal and ethical behavior on the part of all employees, directors, distributors, vendors and physician contractors (hereinafter **covered persons**).

1. **Covered persons** shall comply with all federal healthcare program requirements, policies and procedures implemented by Pioneer to assure legal and ethical business practices.
2. **Covered persons** shall fully comply with all federal, state and local laws and regulations.
3. **Covered persons** are obligated to report, to the Compliance Officer, questions with respect to violations, or suspected violations, of any federal healthcare program requirement and/or any questionable or suspected violation of Pioneer's Ethical Statement and/or Code of Conduct.
4. Each **covered person** (including physicians who perform consulting services for Pioneer) will certify, in writing, that he/she has received, read, asked questions to their satisfaction, and understood their obligations and responsibilities under the Pioneer Ethical Statement and this Code of Conduct and that they shall abide by the Ethical Statement and this Code of Conduct.
5. No business practice or contract shall violate the Anti-Kickback Statute (The Medicare and Medicaid Patient Protection Act of 1987, 42 USC Sec. 1320a-7b, as amended), which among other things prohibits anyone from knowingly paying or receiving anything of value to influence the referral of federal healthcare business.
6. Contracts with physicians (Consultants) shall be reviewed and approved by the assigned Project Manager and the Compliance Officer before being transmitted or offered to any physician.

7. Pioneer Surgical Technology, Inc. shall complete a thorough review and assessment of needs for outside physician assistance, those needs shall be documented in writing, and the Compliance Officer shall assure the company is making a reasonable estimate of its needs and acquiring assistance in keeping with those needs.

8. Consultant contracts shall require each Consultant to provide specific documentation as to the work performed, when it was performed, who was present at the time the work was performed, and the number of hours spent in performance. This reporting shall be entered into the Pioneer Consultant Time Tracking Database. The Compliance Officer shall review, at least quarterly, all corporate expenditures made for Consultant contracts and shall assure that before any payment is made, all payments are in keeping with the Ethical Statement and this Code of Conduct.

9. All **covered persons** shall receive training with respect to the legal background of the Anti-Kickback Statute and how this law is to be supported by **covered persons**. Examples of violations under the Anti-Kickback Statute shall be provided, along with a full description of legal sanctions available under the Anti-Kickback Statute.

10. **Covered persons** shall receive orientation and training with respect to this Code of Conduct within ninety (90) days of their date of hire or retention.