

At TranS1 our highest priorities are patient safety, clinical outcomes and compliance. We are proud of our collaboration with physician consultants who help provide training to other surgeons, in addition to advisory and development services leading to better and safer products.

TranS1 has taken the initiative to voluntarily disclose all 2011 surgeon consultant payments in advance of the federally mandated Sunshine Payment Act which will require all companies to report payments to physicians starting in 2013.

This document provides an overview of TranS1's compliant surgeon consulting program.

Our surgeon consulting process adheres to the below principles:

- An annual Needs Assessment plan prospectively defines the TranS1 business needs that require surgeon consultant involvement.
- Surgeon consultants are identified based upon their relevant qualifications.
- Prospective consultants are screened against several different federal exclusion databases.
- Services delivered by consultants are done so in the context of a signed, written agreement.
- Surgeon consultants are engaged for services only where there is a bona fide business need.
- All payments are made at Fair Market Value.

It is against TranS1 policy to engage a surgeon consultant for an activity where there is an explicit or implied quid pro quo.

Types of consulting services include:

Category	Examples
Training & Education	<ul style="list-style-type: none"> • Training of new users on TranS1 technology • Training of TranS1 Clinical Sales Managers and other TranS1 staff • Educating other spine surgeons on TranS1 technologies at medical society meetings and workshops
Advisory	<ul style="list-style-type: none"> • Scientific and Medical Advisory Boards • Marketing and training material review and input
Research & Development	<ul style="list-style-type: none"> • Working with TranS1 to develop new technologies to treat spinal disorders • Helping to improve existing systems to make them simpler and easier to use