



Policy Executive Summary & Primer

Policy Title and Number:	<i>Offer and Acceptance of Gifts and Business Gratuities</i>	CORE-LC-005.3
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This executive summary document is intended only to provide an overview of the information contained within the policy. In no way does this document replace or supersede the content of the policy.

Executive Summary

- The Offer and Acceptance of Gifts and Business Gratuities Policy (“Policy”) provides guidance regarding the solicitation, provision, and acceptance of gifts and business gratuities.
- The Policy applies to all Company employees, agents, and independent contractors.

Key Policy Requirements

- Approval from the Compliance Officer or the Company Legal Department is required prior to the initiation of any incentive, reward, or referral program.
- Questions or concerns should be directed to the Compliance Officer or the Company Legal Department.

Acceptance of Gifts-

- Except as otherwise noted in the Policy, Company employees, agents, and independent contractors may not:
 - Accept gifts of cash or cash equivalents from individuals or entities outside the Company.
 - Accept gifts or business gratuities that are intended to influence, or appear to influence performance of their official duties.
 - Solicit personal gifts or gratuities from individuals or entities outside the Company.
 - Accept gifts of a personal nature (e.g., concert or sports tickets).
- Unsolicited meals and snacks are prohibited unless provided as part of an educational seminar or training that relates to the attendee’s duties for the Company.
- The following items may be accepted in certain circumstances defined within the policy:
 - Unsolicited perishable gifts.
 - Unsolicited gifts of nominal value (\$75 or less per calendar year from any individual or entity).
 - Promotional items of nominal value (\$15 or less per instance and no more than \$75 in the aggregate annually per vendor, referral source, contractor, manufacturer, or supplier).

Offering of Gifts-

- The Company may provide meals, snacks or promotional items to certain individuals and entities, provided that the meals, snacks, or promotional items have a retail value of no more than \$15 per instance and no more than \$75 in the aggregate on an annual basis. (Meals and snacks apply to

institutions as a whole).

- Meals or snacks may not be provided to any patients, unless pursuant to the provision of Company services.
- Food, beverages, gifts, and entertainment (even of nominal value) must not be offered to any federal or state governmental official.
- Cash or cash equivalents must never be offered to patients.