

Subject: Business Ethics	Policy Number: BE-001
Policy: Business Courtesy Meals	Effective Date: July 1, 2016
	Revision Date(s):

- I. General Policy.** Modest meals and refreshments may be provided as an occasional business courtesy to a Customer when incidental to a legitimate business purpose and in compliance with this Policy and applicable laws, regulations and industry guidelines. “Modest” for purposes of this Policy means moderate or low in value in light of the type of business courtesy after taking into account certain regional differences provided that the amount is no greater than Clinical Innovations’ upper dollar limit for that type of business courtesy.
- II. Specific Policies.**
- A. Informational Presentations and Discussions with Customers.** Business courtesy meals and refreshments may be provided in connection with information presentations and discussions with Customers as long as:
1. The purpose of the program or meeting is a bona fide presentation or discussion of scientific, educational or business information related to areas in which Clinical Innovations has ongoing business interests;
 2. The number of Customers in attendance must be conducive to the presentation of such information;
 3. A Clinical Innovations employee participates in the program or meeting;
 4. The business courtesy meals and refreshments are modest in value;
 5. The business courtesy meals and refreshments are provided to the Customer on no more than an occasional basis (i.e., no more than six times per year) unless the meals and refreshments are specifically exempted from this provision by this Policy; and
 6. The business courtesy meals and refreshments are permitted by the rules of the recipient’s employer; and
 7. The business courtesy meals and refreshments are not offered or provided with the intent of, directly or indirectly, implicitly or explicitly influencing or encouraging the recipient to use, purchase, lease, order, or arrange for or recommend the use, purchase, lease or order of Clinical Innovation Devices or as a reward for past such behavior or for any other improper purpose.

Note that the provisions of this Policy apply even if Clinical Innovations Personnel are not seeking reimbursement for the expenses (i.e., paying these expenses out of your own pocket does not avoid these requirements).

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- B. Clinical Innovations-Sponsored Training and Education.** Business courtesy meals and refreshments may be provided to Customers in connection with programs that are focused on the education and training of Customers on the safe and effective use of Clinical Innovations Devices in accordance with the Training and Education (BE-005) where the business courtesy meals and refreshments are modest in value and subordinate in time and focus to the educational or training purpose of the program.
- C. Third Party Educational Conferences and Meetings.** Clinical Innovations may provide business courtesy meals and refreshments directly to attendees of third party educational, scientific or policymaking conferences or professional meetings provided that the business courtesy meals and refreshments are modest in value, subordinate in time and focus to the purpose of the conference, open to all conference attendees, provided consistent with the guidelines of the conference sponsor and any applicable accrediting body for the educational activity, and clearly separate from any continuing education component of the program. Such business courtesy meals and refreshments are not counted towards the individual HCP limit set forth in Section II.A.5.
- D. Meals in Connection with Consultant Meetings.** Clinical Innovations may support business courtesy meals and refreshments reasonably necessary in connection with consultant meetings. Meals provided during meetings of the physician advisory board or other similar group consultant meetings are not counted towards the individual HCP limits set forth in Section II.A.5.
- E. Prohibited Business Courtesy Meals.**
1. Clinical Innovations shall only provide business courtesy meals and refreshments to Customers (including physician’s office staff) who are present for the majority of the informational or educational component of the meal (i.e., no “dine-and- dash” or “to go” meals).
 2. Business courtesy meals and refreshments shall not be provided to persons who do not have a bona fide professional interest in the information being presented (e.g., spouses or other guests of the Customer).
 3. Business courtesy meals and refreshments shall not be provided in cash or in cash equivalents (e.g., gift certificates for restaurant meals and refreshments), and shall not include gifts of food (e.g., box of chocolates or cookies, fruit basket, bottle of wine).
 4. Clinical Innovations shall not provide business courtesy meals and refreshments with the explicit or implicit agreement that the Customer will

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use, purchase, lease, order, or arrange for or recommend the use, purchase, lease, or order of Clinical Innovations Devices or as a reward for past use, orders, or recommendations of Clinical Innovations Devices or for any other improper purpose.

- F. Governmental Personnel.** No business courtesies shall be provided to Federal, state, or local government personnel (including, for example, employees of state, county, or city facilities) without prior approval of the Compliance Officer or legal counsel as appropriate to determine consistency with the laws governing business courtesies to such individuals.

III. Upper Dollar Limits for Business Courtesies

- A.** Clinical Innovations' upper dollar limit for breakfast is \$25 per person, except in Boston, Chicago, Los Angeles, Miami, New York City, San Francisco or Washington DC where Clinical Innovations' upper dollar limit for breakfast is \$35 per person.
- B.** Clinical Innovations' upper dollar limit for lunch is \$50 per person, except in Boston, Chicago, Los Angeles, Miami, New York City, San Francisco or Washington DC where Clinical Innovations' upper dollar limit for lunch is \$65 per person.
- C.** Clinical Innovations' upper dollar limit for in-office refreshments other than meals is \$10 per person.
- D.** Clinical Innovations' upper dollar limit for dinner is \$125 per person, except in Boston, Chicago, Los Angeles, Miami, New York City, San Francisco or Washington DC where Clinical Innovations' upper dollar limit for dinner is \$150 per person.
- E.** Dollar limits on business courtesies are inclusive of all costs associated with the food and beverage provided and associated gratuities, taxes and/or delivery charges. Separate room rental costs for a function do not need to be included on the dollar limit on business courtesies; however, the venue should not be exceptional.

IV. Documentation.

The Clinical Innovations employee responsible for providing the business courtesy is responsible for maintaining, and supplying to the Finance Department prior to reimbursement, documentation that:

- A.** Records the expense of the business courtesy;
- B.** Identifies the business purpose of the business courtesy;

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- C. Indicates the name of each Clinical Innovations employee and Customer (including physician office staff) who attended the business courtesy; and
 - D. Indicates the name of the educational sponsor in the case of a business courtesy in connection with a third party educational conference or meeting.
- V. Additional Restrictions and Disclosure Requirements.** A number of states and foreign countries impose additional restrictions on Clinical Innovations' activities and its interactions with Customers. In addition, the federal government and some states require tracking or disclosure of economic benefits associated with certain activities and interactions. The standards for federal disclosure of economic benefits are set forth in the Disclosure of Certain Payments and Other Transfers of Value Policy (BE-008). Clinical Innovations Personnel are responsible for complying with state-specific requirements, some of which are referenced in BE-008.