

Subject: Business Ethics	Policy Number: BE-002
Policy: Educational Items; No Gifts or Entertainment	Effective Date: July 1, 2016
	Revision Date(s):

I. General Policy. Clinical Innovations may provide educational items to a Customer or a Patient in compliance with this Policy and applicable laws, regulations and industry guidelines. Clinical Innovations Personnel shall not provide or offer entertainment, trips, recreational events, or certain gifts to Customers or Patients, including in connection with attendance at an educational or informational presentation.

II. Specific Policies.

A. Educational Items for Customers or Patients. Clinical Innovations Personnel may offer and provide educational items to Customers or Patients only under the following circumstances. Such items shall not be offered on more than an occasional basis, even if each individual item is appropriate.

1. Clinical Innovations Personnel may offer and provide items that benefit Patients or serve a genuine educational function for the Customer.
2. Any such item should have a fair market value (generally, retail value) of less than \$100, except for medical textbooks or anatomical models used for educational purposes.
3. Any such item should not have value to a Customer outside of his or her professional responsibilities.

B. Prohibited Gifts.

1. No educational items shall be provided to a Customer or a Patient in cash or in cash equivalents (e.g., general gift certificates), except that a gift certificate which is restricted to use for a permissible educational item (e.g., a certificate usable only for purchases of educational items from a medical textbook vendor) is acceptable.
2. Items intended for the personal benefit of the Customer, such as golf bags, golf balls, PDAs, clothing, iPods, non-educational DVDs, sporting event tickets, concert tickets, artwork, floral arrangements, and jewelry shall not be offered or given to Customers, even if the items bear Clinical Innovations' logo.
3. Gifts to Customers of medical equipment designed for patient treatment, rather than education, are prohibited, such as stethoscopes, pedometers, and stop watches.
4. Branded promotional items that are non-educational shall not be provided to a Customer, even if the item is of minimal value and for the benefit of

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patients or is related to a healthcare professional's work (e.g., pens, pencils, notepads, mouse pads, clipboards and calendars).

5. Items of food (e.g., fruit basket, wine, candy) and meals that do not comply with the Business Courtesy Meals Policy (BE-001) are prohibited.
6. Items may not be raffled off or given away (including at a trade show) that would not be a permissible educational item under this Policy.
7. A gift for a Customer or a Patient may not be purchased using the personal funds of a Clinical Innovations employee.
8. Clinical Innovations shall not provide otherwise permissible educational items with the explicit or implicit agreement or in connection with discussions or negotiations regarding product pricing or whether the Customer will 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.

C. Entertainment, Trips and Recreational Events Prohibition. Clinical Innovations personnel shall not provide or offer entertainment, trips or recreational events to Patients or Customers, including Clinical Innovations Consultants. This includes, but is not limited to resort vacations, boating trips, concerts, golf outings and sporting events, even when in connection with a meeting regarding Clinical Innovations Devices, an educational program, a business courtesy meal, a consultant meeting or a third party conference.

D. Governmental Personnel. No permitted educational items shall be provided to Federal, state, local or other 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 economic benefits to such individuals.

III. Documentation. The Clinical Innovations employee responsible for providing the educational item is responsible for maintaining and supplying to the Finance Department documentation that:

- A. Records the expense of the educational item; and
- B. Indicates the name of the Customer who received the item.

IV. Additional Restrictions and Disclosure Requirements. A number of states and foreign countries impose additional restrictions on Clinical Innovations' activities and its

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interactions with Customers and Patients. 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.