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| <b>Subject:</b> Business Ethics | <b>Policy Number:</b> BE-006        |
| <b>Policy:</b> Needs Assessment | <b>Effective Date:</b> July 1, 2016 |
|                                 | <b>Revision</b><br><b>Date(s):</b>  |

- I. General Policy.** Clinical Innovations uses an annual needs assessment process as the basis for all business operations that involve payments to or in support of the activities of Customers, including evaluating educational Grants, research Grants and charitable Donations, entering into Consulting Agreements, and conducting product Training and Education programs.
- II. Specific Policy.** Excepting special or unforeseen circumstances, Clinical Innovations will not award Grants, Donations, Consulting Agreements, or otherwise make payments to or support the activities of Customers unless Clinical Innovations has previously budgeted for such an expense in Clinical Innovations' annual budget. If special or unforeseen circumstances arise warranting an exception, the activity must be reviewed and approved by Clinical Innovations' Chief Executive Officer.
- III. 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.