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| <u>POLICY & PROCEDURE</u> | Page 1 of 4 |
| SUBJECT: Business Gifts and Courtesies ADM. 151 DEPT: Administration | Effective Date: 02/01/1999 Revision Date: 06/01/2021 |

POLICY: It is the policy of Inspira Health to provide guidance to all employees, contractors, vendors, physicians, volunteers, board members and business associates as to the parameters for offering or giving, or requesting or receiving gifts, meals, entertainment or other items of value. This guidance applies to all aspects of business of Inspira Health and its affiliates.

1. General Rule

1.1. Inspira Health employees, staff, volunteers and board members (hereinafter, "Inspira Health Associates") shall not use their role with Inspira Health (hereafter, "Inspira") or its affiliates to seek personal benefit from those doing business or seeking to do business with Inspira, nor accept such gain if offered. In this regard, personal benefit means, for example, gifts, meals or entertainment such as meals and beverages, travel and accommodation for business or vacation purposes, tickets to sporting or cultural events, discounts not available to the general public, cash, loans (except normal loans from regular lenders, on conventional terms), sponsorships, parties, prizes and any other merchandise or services from any person, organization or group that does, or is seeking to do business with Inspira, or from a competitor or any of its affiliates.

1.2. Decisions made by Inspira Health Associates in the course of their work must be objective and based solely upon the best interest of Inspira. They should never be influenced by any consideration whatsoever of personal benefit or gain to any personal associate (such as a friend or relative). To avoid the appearance of impropriety, we shall make our purchasing and other decisions solely on the basis of which vendor offer the best value for the goods and services we need. To that end, we avoid doing anything that could give the appearance or suggestion that our purchase decision may be influenced by any irrelevant or improper consideration, whether illegal (such as a kickback or bribe) or technically legal (such as personal friendship, favors, gifts or free entertainment).

1.3. Inspira Health Associates who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business, or who participate in negotiating contracts must be particularly careful to avoid actions that create the appearance of favoritism or that have the potential to adversely affect Inspira's reputation for impartiality and fair dealing. Inspira Health Associates shall refuse a courtesy from a vendor when Inspira is actively involved in choosing or reconfirming a vendor or under circumstances that would create an impression that offering courtesies is the way to obtain Inspira business. In this context, consultants should be treated as vendors .

2. Guidelines for Giving or Receiving Gifts, Meals and Entertainment from **Non-Referral Sources**

2.1. These guidelines apply to anything given or received as a result of a business relationship for which the recipient does not pay fair market value. This includes gifts, meals or entertainment such as meals and beverages, travel and accommodation for business or vacation purposes, tickets to sporting or cultural events, discounts not available to the general public, cash, loans (except normal loans from regular lenders, on conventional terms), art objects, sponsorships, parties, prizes and any other merchandise or services. The guidelines apply at all times: they do not change during traditional gift-giving seasons or during the planning of a company event.

2.2. Inspira believes it is not realistic to rule out acceptance of all gifts, meals and entertainment, nor is it realistic simply to set a dollar limit on gifts that may be acceptable.

2.3. Inspira believes the real key is in the judgment of each employee and his or her immediate supervisor as to whether a gift or entertainment might be improper or unreasonable in the circumstances. The significance of a gift often lies not in the dollar value, but in the circumstances surrounding the giving and the acceptance.

2.4. Specific Circumstances.

The following sections describe certain gifts, meals and entertainment situations that commonly arise in the course of our efforts for Inspira. While each circumstance shall be evaluated for its appropriateness and reasonableness on its own terms, the dollar amounts described below should be regarded as appropriate benchmarks against which the determination of reasonableness might be measured.

2.4.1. Social or Entertainment Events. We recognize there will be times when a current or potential vendor may extend an invitation to attend a social or entertainment event in order to further develop the business relationship. Invitations may be accepted provided: (1) the cost associated with such an event is reasonable and appropriate, which, as a general rule, means the cost will not exceed \$100 per person; (2) no expense is incurred for any travel costs (other than in a vehicle owned privately or by the host company) or overnight lodging; and (3) such events are infrequent.

2.4.2. Vendor Sponsored Events. On occasion, a vendor will extend training and educational opportunities that include travel and overnight at no cost to associates or to Inspira. Similarly, there are some circumstances where there is an invitation to an event at a vendor's expense to receive

information about new products or services. Prior to accepting any such invitation, approval to attend these opportunities will need to be obtained from the manager or director of the department.

2.4.3. Gifts. As an Inspira Health Associate, gifts may be accepted (including items of small value such as coffee cups, tee shirts, pens from third parties given for promotional purposes) with a total value of \$50 or less in any one year from any individual or organization who has a business relationship with Inspira. Perishable or consumable gifts given to a department or group are not subject to any specific limitation. For purposes of this paragraph, physicians practicing in Inspira Health facilities are considered to have such a relationship.

2.4.4. Meals. Meals occurring in connection with business discussions or the development of business relationships are generally deemed appropriate in the conduct of official business. As a general guideline, business entertainment in the form of meals and beverages are acceptable, as long as it is reasonable, infrequent, and as far as possible on a reciprocal basis. Entertainment in any form that would likely result in a feeling or expectation of personal obligation should not be extended or accepted. This applies equally to giving or receiving entertainment. In general, appropriate expenditures for meals should not exceed \$50 per person.

2.4.5. Solicitation of Gifts, Meals or Entertainment. Under no circumstances shall an associate solicit a gift, meal or entertainment.

2.5. Inspira Health Associates should avoid a pattern of accepting frequent gifts, meals or entertainment from the same persons or companies. Generally, twice each year should be the maximum number of such matters from any one person or organization.

2.6. If there are any concerns or uncertainties, contact the departmental manager or the Vice President of Corporate Compliance.

3. Extending Business Courtesies to **Possible Referral Sources**

Any entertainment or gift involving physicians or other persons who are in a position to refer patients to our healthcare facilities must be undertaken in accordance with our Corporate Compliance program and with all applicable laws. Inspira Health Associates shall comply with all laws, regulations, and rules regarding these practices. If there are questions regarding this, please contact the Vice President of Corporate Compliance or the Inspira Health Legal Department.

4. Government Representatives

What is acceptable practice in the commercial business environment may be against the law or the policies of federal, state or local governments. Therefore, no gifts or business entertainment of any kind may be given to any government employee without the prior approval of the Vice President of Corporate Compliance or the Inspira Health Legal Department.

5. Required Disclosure

Inspira requires employees to disclose to their immediate supervisor, in writing, any business gift, meal or entertainment that has a value of more than \$200 (or a lower amount set by the departmental manager). This disclosure must be made each time an employee gives or receives a gift, meal or entertainment that exceeds \$200 (or a lower amount set by the departmental manager). This disclosure requirement applies both to gifts given to individuals and to gifts given to groups, such as departments or units.

6. Changes or Modifications to this Policy

Any Inspira organization or department may establish guidelines that are more restrictive than those described in this policy. For example, a particular department may determine that a rule requiring that its employees accept no gifts, meals or entertainment is more appropriate to its circumstances. Any such more restrictive guideline must be clearly communicated to the applicable group of Inspira Health Associates and the Vice President, Corporate Compliance. However, no Inspira organization or department may establish guidelines that are less restrictive than those described in this policy.