

<p style="text-align: center;">Ministry Health Care Gifts and Entertainment Guidelines For Suppliers</p>

Introduction

Ministry Health Care has adopted the following 'Gifts and Entertainment' Guidelines for Suppliers to promote mutually beneficial and win-win relationships between Ministry entities and Ministry Suppliers.

These Guidelines promote compliance with, and avoids potential violations of, the Anti-Kickback Statute and the Stark Law. Simply put, gifts and entertainment are not necessary for a successful relationship with Ministry Health Care or any Ministry entity.

All Ministry employees and individuals who have a relationship with or provide services on behalf of Ministry are expected to act in a manner that is consistent with Ministry's Mission and Core Values. Ministry selects its Suppliers and contractors in a non-discriminatory manner and based on appropriate quality, service, cost and ability to supply a range of materials and services. A decision to hire a Supplier or contractor must never be based on personal interests or interests of family members, but must be in the best interests of Ministry.

Ministry expects all Suppliers to comply with these Guidelines. With limited exceptions noted below, Ministry employees and others working on our behalf are prohibited from accepting gifts and entertainment opportunities. Ministry's acceptance of gifts and entertainment opportunities from Suppliers could be perceived as an improper inducement of a business relationship. Therefore, we respectfully ask all Suppliers to avoid putting our employees in the position of having to refuse such offers.

Our Core Values (see www.ministryhealth.org 'About Us') determine our principles. These principles apply to all transactions, large or small, and describe the behavior expected of our employees and every Supplier conducting business with Ministry.

Catholic Health Care was built on a foundation of integrity. Our religious sponsor brought a values-based way of living to the communities that we have served since the 1800's. Throughout our history, Catholic Health Care built relationships based upon integrity and trust. Those relationships enable us to assume the challenging role of caring for those most in need and those least able to care for themselves.

Today, the complexity of our world requires that health care organizations actively pursue, support and nurture workplace integrity. Workplace integrity is an uncompromising commitment to both legal and ethical principles and it is critical for Catholic Health Care organizations to reaffirm our total commitment to integrity in our words and actions. Even the perception of fraud or abuse undermines the public's trust in us and our organization.

We are responsible for being good stewards of public and private resources as we are entrusted with government and commercial funds to provide necessary care and services to beneficiaries. We have a duty to prevent waste and to prevent or stop fraud of any kind.

Ministry recognizes that maintaining the trust and confidence of our patients, employees, government (who pay us for providing health care services), local community, Board of Directors, stakeholders, Suppliers and all with whom we do business, is crucial to Ministry's continued growth and success.

We intend to merit this trust by conducting ourselves in an ethical manner and ensuring that our employees and Suppliers understand our expectations, including the attached Gifts and Entertainment Guidelines for Suppliers.

Respectfully,



Nicholas Desien
President and CEO

Sister Lois Bush
Senior Vice President of Mission & Culture Integration
& Corporate Integrity Officer

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Gifts and Entertainment Guidelines for Suppliers

Ministry selects its Suppliers in a non-discriminatory manner and based on appropriate quality, service, cost and ability to provide a range of materials and services. Offers of gifts or entertainment opportunities are not necessary for a successful business relationship with Ministry. We ask that all Suppliers review and comply with these Guidelines.

Gifts, Gratuities and Entertainment from Suppliers

- Ministry employees and others acting on behalf of Ministry are prohibited from offering, inviting or accepting most forms of gifts and entertainment from Suppliers.

- In no event will Ministry or any Ministry employee accept any gifts or entertainment from a Supplier if the intent of the gift is to induce an improper relationship.
- Likewise, neither Ministry nor any Ministry employee will accept any offer of gifts or entertainment from a Supplier if the intent of the gift is to induce referrals. If you believe that an individual with whom you are working has solicited a gift or entertainment, or if someone representing Ministry has inappropriately offered you something of value, please contact our Supply Chain office for assistance.
- Ministry expects that Suppliers will refrain from saying or doing anything that could be seen as inviting a gift, gratuity or kickback from Ministry employees or others doing business on our behalf.
- Suppliers are prohibited from providing meals to Ministry medical staff members or employees on-site at Ministry clinics, hospitals or other facilities.
- Ministry employees may not accept lavish meals, gifts or entertainment off-site from any Supplier, prospective Supplier or contractor and must decline any such meal, gift, or entertainment opportunities. Ministry employees must also decline any meal, gift or entertainment opportunity which might influence, or appear to influence, business decisions. However, an infrequent and modestly priced meal (generally meaning a reasonable and appropriate cost not to exceed \$50 per person) that is paid for/sponsored by a Supplier as a business courtesy is acceptable as long as there is a business purpose. Ministry employees must be allowed to reciprocate if there is an appropriate opportunity to do so.
- Suppliers may, but are not encouraged to, give items of nominal value such as candy or flowers to a department of a Ministry entity. However, such actions will not have any impact on Ministry's decision regarding whether to enter into a relationship with a Supplier.
- Routine, inexpensive, advertising materials such as pens, pencils, mugs or calendars marked with Supplier name may be accepted. These are considered gifts of nominal value.
- Reasonable invitations to business-related meetings, conventions, conferences or product-training seminars may be accepted; however, Ministry employees, and those who have a relationship with or provide services on behalf of Ministry, are expected to pay their own way and obtain reimbursement consistent with our internal business reimbursement policies.
- In the event a Ministry employee needs to travel off-site to visit a Supplier in order to accommodate training for use of equipment or products, the trip will be at Ministry's expense.

- Charitable Hospital foundations or fundraising departments affiliated with Ministry entities may solicit contributions to provide necessary resources in furtherance of Ministry's mission and charitable purposes. In no event will the dollar amount or volume of business conducted with Ministry be used as a requirement or inducement for a Supplier to donate to a Ministry hospital foundation or fundraising department. Ministry will not consider a Supplier's decision whether or not to contribute to a Ministry fundraising activity when awarding business.

Gifts and Entertainment to Suppliers or Contractors

- Only designated individuals in the marketing department and senior management are authorized to offer gifts and entertainment to Suppliers or contractors or to prospective Suppliers or contractors. Gift expenses given to any one individual will not exceed an aggregate of \$50 per calendar year.
- In no event will Ministry or any Ministry employee offer gifts or entertainment to Suppliers or contractors if the intent of the gift is to induce referrals. Likewise, no Supplier or contract should accept any offer of gifts or entertainment from Ministry or any Ministry employee if the intent of the gift is to induce an improper relationship.
- In no event will Ministry cover expenses for a Supplier or contractor to attend conferences or educational events. In addition, expensive gifts such as sporting tickets, sporting activities and lavish meals and entertainment are not acceptable and cannot be given.
- We expect all of our Suppliers to comply with these guidelines and to contact our Supply Chain office to report any concerns with or violations of these Guidelines.

Responsibilities

We also expect our Suppliers to understand the laws with which we are required to comply and to refrain from compromising, or asking our employees to compromise, our ability to remain in compliance with these laws. Most notably:

- Anti-Kickback Statute
Federal Laws prohibit individuals and companies from offering or paying kickbacks to, or soliciting and receiving kickbacks, in exchange for referrals or acquisition of goods and services for which payment is made in whole or in part by Medicare or any state health care program. This means that if anything is given or received in order to promote referrals for health care services, the Anti-Kickback Statute may be violated. This includes free services, certain discounts or anything of value (e.g., certain gifts or entertainment).

- Stark Law

The Stark Law prohibits physician referrals to entities for Designated Health Services (DHS) where the physician, or an immediate family member of the physician, has a financial interest in or relationship with the entity. Financial interest includes both ownership and compensation interests.

The Stark Law defines Designated Health Services or DHS as any of the following services: (i) clinical laboratory services; (ii) physical therapy, occupational therapy, and speech-language pathology services; (iii) radiology and certain other imaging services; (iv) radiation therapy services and supplies; (v) durable medical equipment and supplies; (vi) parenteral and enteral nutrients, equipment and supplies; (vii) prosthetics, orthotics and prosthetic devices and supplies; (viii) home health services; (ix) outpatient prescription drugs; and (x) inpatient and outpatient hospital services. (See 42 CFR § 411.351.)

Reporting

Please contact our office by calling 715-343-3405 if you have any questions regarding these Guidelines, or if you are aware of any violations of our Gifts and Entertainment Guidelines for Suppliers.