



DEPARTMENT: HealthTrust Ethics and Compliance	POLICY DESCRIPTION: Business Courtesies Given by HealthTrust to Others
PAGE: 1 of 11	REPLACES POLICY DATED: 08/01/04, HPG.005, Business Courtesies Extended by HPG to Others; HT.005, 11/02/12
EFFECTIVE DATE: January 1, 2015	REFERENCE NUMBER: HT.005
APPROVED BY: HealthTrust Ethics and Compliance Committee	

SCOPE: All departments within HealthTrust Purchasing Group, L.P. (“HealthTrust LP”) and its direct and indirect subsidiaries including HealthTrust-Europe LLP (“HealthTrust Europe”); the representative office of HealthTrust in Shanghai (“Shanghai Office”) (collectively, “HealthTrust”); and all Advisory Boards.

PURPOSE: To establish parameters for Business Courtesies given by HealthTrust and/or HealthTrust Colleagues to Business Contacts.

DEFINITIONS: Capitalized terms are defined. See back pages of this policy.

ESSENTIAL INFORMATION:

This is a summary of selected topics. Please read this entire document for full information.

This policy pertains to Business Courtesies given to a Business Contact. Business Courtesies may be offered to lawfully promote our business; and may not be offered if understood by either party to be offered to obtain or retain business through the taking of improper action. See Procedure 1 for actions that are NOT considered Business Courtesies.

Additional rules apply to the giving of a Business Courtesy to a Government Official of any sort (federal, state, local; U.S. or non-U.S.); or to giving or receiving Business Courtesies within P.R. China or by P.R. China nationals anywhere in the world. See Policy 3(d).

The value of Business Courtesies given must be modest, reasonable, customary for the location, and must not exceed the “per instance” and “per calendar year” country limits set out in Appendix A.

- For Events, use the limits for the country where the Event takes place.
- For Gifts, use the limits for the country where the Business Contact resides.

Gifts.

- No cash, cash equivalents, stock, notes, etc.
- Gift cards may be given only if:
 - the value is not more than U.S.\$20 (or equivalent in non-U.S. currency), or £15 in the U.K. or E.U
 - the card is not given within P.R. China
 - the recipient is not a P.R. China national
 - the recipient is not a Government Official or a Potential Referral Source.
- A Gift sent to the home or to a Family Member of a Business Contact is also subject to this policy.

Business Courtesy Events.

- No Business Courtesy Event that might be considered lavish or in questionable taste is permitted.
- A business meeting is not considered a Business Courtesy Event, so this policy does not apply to food and beverages served *during* a business meeting. Although there are exceptions, a meal served in an office is usually considered to be part of a business meeting, and a restaurant meal is usually

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considered to be a Business Courtesy.

Travel. HealthTrust Colleagues may not offer to pay a Business Contact’s travel costs, except for:

- Travel within a metro area, or to and from an airport, train station or meeting site, by car, taxi, intra-urban bus or train;
- Train tickets may be purchased by the Shanghai Office for use by a Business Contact who resides outside of P.R. China, if the tickets cannot be purchased in advance outside China. Reimbursement should be sought; or
- As approved pursuant to Appendix A of this policy.

See Procedure 1(c) for details on travel in connection with the HealthTrust Conference.

Government Officials. Special rules apply to the giving of a Business Courtesy to a Government Official.

Reporting requirements.

- The highest-ranking employee involved in giving a Business Courtesy Event or group Gift must ensure it is accurately reported through Concur or EthicsTrak UK per Procedure 4 within 30 days. Individuals must report all Business Courtesies given by them as individuals rather than as part of a group.
- Gifts purchased by HealthTrust in bulk such as holiday gifts for key Members or Clients are Business Courtesies and must also be reported.
- Bulk purchases of “handouts” to be picked up by anonymous persons at events need not be reported if the individual item has a value of \$20 or less.
- If given to a Foreign Official, the reporting requirements set out in Policy HT.020 – *Global Anti-corruption*, must also be followed.

POLICY

1. Scope and related policies. There may be times when HealthTrust and/or a HealthTrust Colleague wishes to offer a Business Courtesy to a Business Contact to further develop a business relationship. This policy applies to all such Business Courtesies. It does not pertain to actions between HealthTrust and its Colleagues, or among HealthTrust Colleagues themselves.
2. The following restrictions apply to all Business Courtesies offered by a Business Contact to a HealthTrust Colleague, except as otherwise noted. This policy does not pertain to actions between HealthTrust and its Colleagues, or actions among HealthTrust Colleagues themselves.
 - (a) A Business Courtesy may be offered in connection with activities lawfully promoting, demonstrating or explaining HealthTrust’s products and services, or other legitimate business activities. No Business Courtesy may be offered by a HealthTrust Colleague to a Business Contact if it is understood by either



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party to be offered or provided to obtain or retain business or a business advantage through the taking of improper action, or to urge others to take improper action, or if the Business Courtesy could be perceived to motivate a Business Contact to take improper action. A Business Courtesy should not be offered to a Business Contact who solicits it in any way, express or implied.

- (b) Special rules apply to giving of a Business Courtesy to any Government Official. See Policy 3(d) below.
- (c) A Colleague may give a Business Courtesy to a Potential Referral Source only with the prior written approval of the Legal Department or ECO.

3. The following requirements apply to specific types of Business Courtesies, as described below.

- (a) Gifts. The total value of all Gifts given in a calendar year to a particular Business Contact by any and all HealthTrust Colleagues who are representing HealthTrust generally, and/or an organization within HealthTrust, must be modest, reasonable and customary for the location, and must not exceed the “per instance” and “per calendar year” limits set out in Appendix A, for the country where the Business Contact recipient resides. A Gift sent to the home or a Family Member of a Business Contact is also subject to this Policy.

The Gift must not be in the form of cash, cash equivalents, stock, checks, notes, warrants or other instruments. Gift cards are acceptable if (i) the aggregate value of all cards given to any one Business Contact during a calendar year does not exceed \$20 in the U.S., or £15 in the U.K. or E.U. (or the equivalent of U.S.\$20 if purchased with other currency); and (ii) the gift card is not given under circumstances in which the laws of P.R. China apply; or to a Government Official or a Potential Referral Source.

- (b) Business Courtesy Events.

- (i) HealthTrust and/or a HealthTrust Colleague may offer an invitation to a Business Contact to attend a Business Courtesy Event, if all of the following requirements are met:

- (A) Topics of a business nature must be discussed and HealthTrust Colleague host present;

- (B) The value of the Event must be modest, reasonable and customary for the location, which as a general rule means the cost will not exceed the “per instance” and “per year” limits set out for food and beverages, entertainment and travel, as applicable, on Appendix A, for the country where the Event takes place (except for U.K. professional association meetings described at 3(b)(iv) below); and

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(C) No Event that might be considered lavish or in questionable taste is permitted.

- (ii) It is sometimes appropriate for HealthTrust to invite the spouse, other Family Member or guest of a Business Contact, to accompany the Business Contact to an Event. In such case, the value must be within the Appendix A per instance limits for each person (for example in the U.S., a maximum of \$150 for the Business Contact and \$150 for the guest). For purposes of the Total expenditure per year maximum set out in Appendix A, the Event counts as one Event rather than two (for example in the U.S., it counts as one Event with a value of \$150 event rather than two Events with a total value of \$300).
 - (iii) A business meeting is not considered a Business Courtesy Event, so this policy does not apply to food and beverages served *during* such a meeting. Although there can be exceptions, a meal served in an office is usually considered to be part of a business meeting, and a restaurant meal is usually considered to be a Business Courtesy.
 - (iv) U.K. healthcare industry meetings. The value limitations of Appendix A of this policy do not apply to an invitation from HealthTrust Europe and/or a HealthTrust Europe Colleague to a Business Contact who is not a Foreign Official to attend a healthcare industry meeting that may include food, beverages and entertainment. The value of such an event may not exceed £300 (or the equivalent in other currency if purchased with other currency) per person per meeting, and may be given to a particular Business Contact no more frequently than two times per calendar year. Any invitation proposed to be given to a person who is not a citizen of the U.K. requires the prior written approval of the CEO or COO, copy to the ECO. If the invitation is to be given to a Foreign Official, Policy HT.020, *Global Anti-corruption* applies, and if the value of the event is expected to exceed the limitations of Appendix A of that policy, approval of an exception must be obtained under that policy; and
- (c) Travel. HealthTrust may not directly or indirectly provide or pay costs of travel (transportation, lodging, or other travel expenses) for any Business Contact, except as follows:
- (i) Travel within a metropolitan area, or to and from the nearest airport or train station to the site to be visited, by car, taxi, or intra-urban bus or train; or
 - (ii) Train tickets may be purchased by the Shanghai Office for use by a Business Contact who resides outside of P.R. China, if the tickets cannot be purchased in advance by a person outside of P.R. China. The Shanghai Office should seek reimbursement for the cost of these tickets (unless the COO agrees in writing that reimbursement should not be sought).



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Travel other than the type set forth in (i) above is a Business Courtesy, subject to the value limitations and/or approval requirements set out in Procedure 3 and Appendix A. Any such required approval must be sought in writing in advance. See Procedure 1(c) for detail as to travel in connection with the HealthTrust Conference.

- (d) Government Officials. There are strict laws in many countries including the U.S., U.K. and P.R. China, which can be at the municipal, county, state, provincial and/or federal levels, regarding giving of Business Courtesies to Government Officials. HealthTrust employees must determine the particular rules applying to such Government Officials through the HealthTrust Law Department, the ECO or their local ECO, and carefully adhere to them. HealthTrust operations in the U.S. and elsewhere in some cases involve hospitals, hospital groups, manufacturers or distributors that are owned and controlled, in whole or in part, by a government.
 - (i) Policy HT.020 – Global Anti-corruption. Rules set out in that policy apply to a Colleague who is considering giving a Business Courtesy to a non-U.S. “Foreign Official”, which is very broadly defined. That policy includes an *Addendum for People’s Republic of China*, which imposes restrictions on both giving and receiving of a Business Courtesy when conducting business (A) within P.R. China, and (B) with P.R. China nationals anywhere in the world.
 - (ii) Prior written approvals required. HealthTrust may not provide Business Courtesies, pay conference-related expenses, or give anything else of value to any Government Official at any level in any country including the U.S. without the prior written approval of the ECO or Legal Department, except that HealthTrust’s Global Sourcing team and HTE have been authorized to do so within the limits set out on Appendix A with oversight from the ECO and HTE ECO through their Business Courtesies tracking processes; and except as provided at (iii) directly below.
 - (iii) Limits for U.S. federal employees.
 - (A) As to U.S. federal Government Officials, Business Courtesies may be provided to them if they are not acting in an oversight, investigative, enforcement or legal role, without advance approval, within limits set out under federal rules that permit such person to accept:
 - (1) Meals valued at no more than \$20 per occurrence, not to exceed a value of \$50 in the aggregate in any calendar year; or
 - (2) Minor refreshments, such as coffee and donuts, provided in connection with business discussions. These minor refreshments do not count toward the \$20 per occurrence and \$50 per calendar year limits noted directly above.



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(B) Gifts must never be provided to any employee or official of the executive branch of the U.S. federal government.

PROCEDURE

1. To summarize, the following are not considered Business Courtesies:

- (a) This policy applies to Business Courtesies offered by HealthTrust to external Business Contacts. It does not apply to actions between HealthTrust and its Colleagues (e.g., an Advisory Board meeting and related travel and meals; a gift given to an Advisory Board member for his or her service) or among HealthTrust Colleagues themselves (e.g., manager taking employees to lunch).
- (b) Food and beverages served *during* a business meeting are not considered Business Courtesies. See Policy 3(b)(iii) above.
- (c) Food and beverages, entertainment and travel provided by HealthTrust to existing Members in connection with a HealthTrust Conference are not considered Business Courtesies; they are a benefit of membership. For potential Members, Clients or potential Clients, such expenses are a Business Courtesy.
- (d) Certain transportation expenses are not considered a Business Courtesy; see Policy 3(c).
- (e) If a HealthTrust Colleague has a personal relationship with a Business Contact, and sometimes socializes with that person and pays for meals or entertainment for that person, the expense is not a Business Courtesy if the Colleague does not include it as a business expense for tax purposes and does not receive reimbursement from HealthTrust, and if no improper benefit is received by the HealthTrust Colleague or HealthTrust in return.
- (f) It is not a Business Courtesy if a Business Contact who is also a Family Member or guest of a HealthTrust Colleague attends a HealthTrust-sponsored meal or entertainment to which Family Members and guests are invited. For example, if a HealthTrust Colleague's husband is an employee of a HealthTrust Member, she may bring him to HealthTrust's annual holiday party, and it is not considered a Business Courtesy extended to a Member.

2. Costs of Business Courtesies for purpose of Appendix A limits.

- (a) For a ticketed Event, the cost is the face value of the ticket unless the HealthTrust Colleague paid more than face value, in which case the cost is the amount actually paid.

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- (b) When the cost of a Business Contact’s attendance at an Event that benefits a charitable organization is paid by HealthTrust, the cost is the fair market value of the Event, rather than the full ticket price (i.e., the charitable contribution may be deducted from the ticket price).
- (c) A Business Contact may not pay part of the cost of an Event offered by HealthTrust that exceeds the Appendix A value limitation and then participate in the Event. It is always acceptable for a Business Contact to pay all of his or her costs and then participate.
- (d) A HealthTrust Colleague may not personally pay, in whole or in part, the cost of a Business Courtesy for a Business Contact, except as permitted under 1(e) of this procedure (Business Contact who has become a friend).

3. Requests for approval of exceptions. Requests for:

- (i) Advance approval to give a Business Courtesy that exceeds or may exceed the “per instance” or “per year” limits set out in Appendix A,
- (ii) After-the-fact approval of a Business Courtesy that was not expected to exceed the “per instance” or “per year” limits set out in Appendix A but did exceed them, or
- (iii) Advance approval for HealthTrust to provide or pay travel expenses of a third party

must be submitted in writing by the senior officer of the applicable department, to the CEO or COO with a copy to the ECO. The CEO or COO will decide if the request is approved or denied and will communicate the decision to the requestor and the ECO. If the request is to exceed the limitations in Policy HT.020 - *Global Anti-Corruption*, or any similar policy applicable to HealthTrust Europe, HealthTrust Colleagues must also follow the procedures in those policies for requesting an exception. Even if the requested approval has been obtained, compliance with Procedure 4 directly below regarding reporting is required.

4. Reporting requirements.

- (a) The highest-ranking employee involved in giving a Business Courtesy Event or group Gift should pay for it and ensure that it is accurately reported within 30 days of giving it. Individuals must report all Business Courtesies given by them as individuals and not as part of a group. In the US and China, it should be reported in Concur as the employee applies for reimbursement for the expense. In the UK, it should be reported in EthicsTrak UK. Appendix B to this policy may be used by Colleagues who do not have access to Concur or EthicsTrak UK. False, misleading or artificial entries must not be made in the books and records of HealthTrust under any circumstances.



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- (b) Bulk purchases. Gifts purchased in bulk by HealthTrust such as holiday gifts for key Members or Clients must be reported. Items purchased in bulk by HealthTrust as “handouts” to be picked up by anonymous persons at an event need not be reported if the individual item has a value of \$20 or less. If an item has a value of more than \$20, it must be reported but the identity of the recipients need not be reported.
- (c) If a Business Courtesy was purchased with currency other than U.S. dollars, state the per person value in U.S. dollars based on the HT FX Rate.
- (d) For Business Courtesies given to Foreign Officials, the reporting procedures set out in Policy HT.020 - *Global Anti-Corruption*, must also be followed.

The ECO is responsible for overseeing implementation of this policy. For questions, please contact Lynn Egan at 615-344-3947, Lynn.Egan@HealthTrustpg.com.

DEFINITIONS

Advisory Board means the HealthTrust LP equity advisory committee, and any other advisory board or committee established by HealthTrust, including without limitation HTE’s evaluation panels, consisting of regular and associate advisory board participants who are representatives of Members or Clients.

Business Contact means any employee or representative of:

- (a) (i) a current or potential Member or Client (other than Members or Clients in their capacity as HealthTrust Colleagues by virtue of their membership on a HealthTrust Advisory Board),
- (ii) a current or potential Supplier,
- (iii) any person or entity who is a source or potential source of referrals of potential new Members or Clients, or Suppliers; or
- (b) a Family Member of any person described in (a)(i) through (a)(iii) above.

(HealthTrust Colleagues should be aware that Policy HT.020 - *Global Anti-Corruption*, imposes additional restrictions on giving Business Courtesies to Business Contacts who are Foreign Officials; and that physicians, purchasing officers and other employees of hospitals or facilities owned or controlled by national, state, provincial or local governments of any Foreign Country may be considered “Foreign Officials” under the referenced *Global Anti-Corruption* Policy and the U.S. Foreign Corrupt Practices Act. In addition, some hospitals or hospital groups may be owned and operated by a government, and additional rules apply. See details within this policy.)

Business Courtesies include Gifts or Business Courtesy Events or in some limited cases travel, organized or hosted directly or indirectly by HealthTrust alone or with others, given directly or indirectly by HealthTrust or a HealthTrust Colleague to a Business Contact, to promote cordial relations or otherwise promote HealthTrust’s business. Business Courtesies do not include Gifts or Events given to influence the recipient to do anything improper or to inappropriately favor HealthTrust.

Business Courtesy Event or an **Event**, means a social event where food and/or beverages are served; or an entertainment



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event such as a sport or cultural event; in each case given directly or indirectly by HealthTrust to a Business Contact, at which business matters are discussed and the HealthTrust host is present, but it is apparent that the event is not intended as a business meeting.

CEO means the Chief Executive Officer of HealthTrust LP.

Client means a customer or client of HealthTrust that is not a Member, and that receives fee-based consulting services (and in some cases, assistance with custom contracting) offered by HealthTrust under one of the following programs: EnergyTrust, ServiceTrust, SolutionsTrust and SourceTrust; or other programs offered by HealthTrust from time to time.

COO means the Chief Operating Officer of HealthTrust LP.

ECO means the Ethics and Compliance Officer of HealthTrust LP reporting directly to the CEO.

EthicsTrak means the on-line system for tracking certain data for HealthTrust's Ethics & Compliance program. In the U.K. it is used to track Business Courtesies given and received, and conflicts of interest, using this link: [EthicsTrak U.K.](#) In the U.S. and China, EthicsTrak is used to track Business Courtesies received using this link: [EthicsTrak](#), and Business Courtesies given are tracked using Concur.

Family Member means a person's spouse, common law spouse, domestic partner of the same or opposite gender; natural parent, adoptive parent or stepparent; child or stepchild; sibling, half-sibling or step-sibling; father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law; grandparent or grandchild, and spouse of a grandparent or grandchild; or any other member of the person's household.

Foreign Country means a country other than the United States.

Foreign Official means any individual employed by, or acting on behalf of, the government of a country other than the United States, an instrumentality of the government of a Foreign Country, or an entity owned or controlled by the government of a Foreign Country, even if the government is not the sole owner (e.g., a government-owned hospital or manufacturing facility), or a public international organization such as the World Health Organization. Foreign Official also means any political party in a Foreign Country, any candidate for public office in a Foreign Country or any political party official in a Foreign Country. An individual can be considered a Foreign Official even though he or she may not be treated as a Foreign Official by his or her own government, and even though he or she may expect to be treated like a private businessperson. The term "Foreign Official" is deemed to include family members of the Foreign Official. HealthTrust Colleagues should be aware that physicians, purchasing officers and other employees of hospitals or other facilities owned or controlled by national, state, provincial or local governments of any Foreign Country may be considered "Foreign Officials" under Policy HT.020 - *Global Anti-Corruption*, the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. Additional examples of persons who should be treated as Foreign Officials can be found in Policy HT.LL.AC.001. If you do not know whether your Business Contact is a Foreign Official, treat such person as a Foreign Official when acting on behalf of HealthTrust until you have confirmed that he or she is not a Foreign Official.

Gift means a thing of value, other than a Business Courtesy Event.

Government Official means a Foreign Official and/or any other person who is employed by, an elected or appointed



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official of, or acting on behalf of, a federal, state/provincial or local government.

HealthTrust Colleagues or Colleagues means:

- (a) any individual who works full- or part-time for HealthTrust including
 - (i) employees of HealthTrust,
 - (ii) employees of HCA Management Services, L.P. who work for HealthTrust under a management contract,
 - (iii) employees of China International Intellectech (Shanghai) Corporation who are dispatched to work for the Shanghai Office, or
 - (iv) independent contractors providing services to HealthTrust; and
- (b) a Member or Client representative who participates on an Advisory Board as a regular or associate participant.

HealthTrust Conference means a conference, trade show or similar activity organized by HealthTrust for its existing and potential Members and/or Clients, that includes several types of events such as educational events, Supplier exhibits and other activities, and for which HealthTrust determines objectives, content and materials; selects faculty, speakers and invitees; and determines the schedule, location and related activities; including without limitation the HealthTrust University Conference (note that HTU will typically include Members but not potential Members or Clients), and the CoreTrust Conference. For further information see [Policy HT.004 – HealthTrust Events](#).

HT FX Rate means the exchange rate for a non-U.S. currency that is used by HealthTrust to prepare its budget for the current year.

Legal Department means the HealthTrust Legal Department.

Member means an entity that has become a member of HealthTrust by signing a participation agreement with HealthTrust under which the entity participates in a group purchasing program offered by HealthTrust.

Potential Referral Source means an individual about whom both of the following criteria are true: (i) the individual is currently licensed in any state as a doctor of medicine or osteopathy, a doctor of dental surgery or dental medicine, a doctor of podiatric medicine, a doctor of optometry, or a chiropractor, and (ii) has provided healthcare services to a patient, referred a patient or placed an order on behalf of a patient relating to the patient’s healthcare within the most recent twelve months.

P.R. China means the People’s Republic of China.

Supplier means any individual or entity that has, or seeks to have, a contract with HealthTrust, as a vendor, consultant, distributor, landlord or in any other capacity; but excluding Members and Clients, independent contractors and those under employment contracts with HealthTrust.

REFERENCES

- [HealthTrust Code of Conduct](#)
- [HealthTrust Supplier Business Relationship Statement](#)
- [Policy HT.003 – Conflict of Interest](#)
- [Policy HT.006 – Business Courtesies Received by HealthTrust Colleagues from Others](#)



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Policy HT.019 - *Agreements with Professionals Who May Be Referral Sources*
Policy HT.020 - *Global Anti-corruption*
Rules Relating to Certain Marketing Activities (conferences, raffles, games, giveaways, marketing surveys)

Version date December 10 2015

HT.005 Business Courtesies Given by HealthTrust to Others

Appendix A

Limits by Country for Business Courtesies Given by HealthTrust to Others

The limits below reflect the maximum value that can be given to an individual Business Contact, per instance and per calendar year, without requesting and receiving approval of an exception per Procedure 3. **However, except as provided in Policy 3(d), prior written approval must be obtained for the giving of a Business Courtesy of any value to a Government Official of any country, including the United States.**

Regardless of whether any specific approval is required and obtained, Colleagues must comply with the reporting requirements of Procedure 4.

For reporting purposes, if the Business Courtesy was purchased with currency other than U.S. currency, state the per person value in U.S. Dollars based on the HT FX Rate.

What country limit applies to the Business Courtesy I have given or wish to give?

For Business Courtesy Events, such as a social event where food and/or beverages are served; or an entertainment such as a sport or cultural event; use the limits for the country where the Event takes place.

For Gifts, use the limits for the country where the Business Contact recipient resides. If it is considered to be more appropriate for the limit to be based on the country where the HealthTrust Colleague resides, approval for an exception must be sought per Procedure 3.

If the applicable country is not listed below, prior written approval of the ECO must be obtained before the Business Courtesy is given.

Country	Type of expense	Per instance	Per calendar year
United States	Food + beverages	\$150	\$500
	Travel	As approved by CEO or COO + ECO	As approved by CEO or COO + ECO
	Gifts	\$75	\$75
	Entertainment	\$150	\$500
	Total expenditures	\$150¹	\$500
United Kingdom	Food + beverages	£250	£500
	Travel	As approved by CEO or COO + ECO	As approved by CEO or COO + ECO
	Gifts	£25	£25
	Entertainment	£250	£500
	Total expenditures	£250¹	£500
People's Republic of China	Food + beverages	RMB 250	RMB 500
	Travel	RMB 100	RMB 200
	Gifts	RMB 100	RMB 200
	Entertainment	RMB 100	RMB 200
	Total expenditures	RMB 350¹	RMB 700

¹ "Total expenditures per instance" means the maximum amount that may be spent for an Event that involves more than one category of Business Courtesy, such as a meal followed by an entertainment in the same evening.

Country	Type of expense	Per instance	Per calendar year
India	Food + beverages	INR 1,500	INR 1,500
	Travel	INR750 w/ CEO or COO + ECO approval	INR750 w/ CEO or COO + ECO approval
	Gifts	INR 1,000	INR 1,000
	Entertainment	INR 1,000	INR 1,000
	Total expenditures	INR 2,000¹	INR 3,000
Philippines	Food + beverages	PHP 1,500	PHP 1,500
	Travel	PHP750 w/CEO or COO + ECO approval	PHP750 w/ CEO or COO + ECO approval
	Gifts	PHP 1,000	PHP 1,000
	Entertainment	PHP 1,000	PHP 1,000
	Total expenditures	PHP 2,000¹	PHP 7,000
Middle East includes: <ul style="list-style-type: none"> • Saudi Arabia • Abu Dhabi • Kuwait • UAE • Qatar • Egypt • Oman • Algeria • Bahrain 	Food + beverages	£ 75	£ 200
	Travel	As approved by CEO or COO + ECO	As approved by CEO or COO + ECO
	Gifts	£ 25	£ 25
	Entertainment	£ 75	£ 200
	Total expenditures	£ 75¹	£ 200
Russia	Food + beverages	RUB 5,000	RUB 12,600
	Travel	As approved by CEO or COO + ECO	As approved by CEO or COO + ECO
	Gifts	RUB 1,250	RUB 1,250
	Entertainment	RUB 5,000	RUB 12,600
	Total expenditures	RUB 5,000¹	RUB 12,600
European Union (other than United Kingdom)	Food + beverages	€ 60	€ 190
	Travel	As approved by CEO or COO + ECO	As approved by CEO or COO + ECO
	Gifts	€ 30	€ 30
	Entertainment	€ 60	€ 190
	Total expenditures	€ 60¹	€ 190

¹ "Total expenditures per instance" means the maximum amount that may be spent for an Event that involves more than one category of Business Courtesies, such as a meal followed by an entertainment in the same evening.

HT.005 Business Courtesies Given by HealthTrust to Others

Appendix B

**Gifts or Entertainment Given by HealthTrust to Others
Disclosure Form**

US and China Employees should report Business Courtesies Given through Concur when they request reimbursement for that expense. If you do not have access to Concur, contact Lynn Egan at lynn.egan@healthtrustpg.com to request access. If you cannot obtain access, please complete and return this form to: HealthTrustEthics-Compliance@HealthTrustpg.com

UK Employees should report Business Courtesies Given through [EthicsTrak U.K.](#) If you do not have access to EthicsTrak U.K., please complete and return this form to: HealthTrustEthics-Compliance@htepg.com

Today's date _____, 20__

I gave a Business Courtesy to one or more Business Contact(s) as described below:

My ¼ ID _____
My first name _____
My last name _____
My title _____
Name of my employer _____

Names of other HealthTrust Colleagues who participated (last name, first name, title)

Business Courtesy type:

- Gift
- Food or beverage
- Entertainment (sport, cultural)
- Travel

Describe the Business Courtesy given (type of gift, restaurant name, type of sporting cultural event, etc.)

Date offered _____

Place offered city/state/country _____

Receiving entity type:

- Potential Member or Client
- Existing Member or Client
- Potential Supplier
- Existing Supplier
- Other (specify): _____

Receiving entity name: (If more than one, complete a separate report for each entity) _____

Receiving person 1 last name _____

Receiving person 1 first name _____

Receiving person 1 title _____

Receiving person 1 home country _____

Receiving person 2 last name _____

Receiving person 2 first name _____

Receiving person 2 title _____

Receiving person 2 home country _____

Receiving person 3 last name _____

Receiving person 3 first name _____

Receiving person 3 title _____

Receiving person 3 home country _____

Receiving person 4 last name _____

Receiving person 4 first name _____

Receiving person 4 title _____

Receiving person 4 home country _____

(If more please use additional sheets)

Could any recipient be a "Foreign Official" per Policy HT.LL.AC.001? Yes No

Per person value in currency used _____

Currency used _____

If non-U.S. currency, state per person value in U.S. dollars per HT FX Rate: \$ _____

Describe business purpose of this benefit, including the HT business the recipient is positioned to influence:

Comments if any:

Thank you.