



DEPARTMENT: HealthTrust Ethics and Compliance	POLICY DESCRIPTION: HealthTrust Events
PAGE: 1 of 7	REPLACES POLICY DATED: 08/01/04, HPG.004, Receipt of Vendor Funds for Educational Events; 11/02/12, HT.004, Supplier Participation in HealthTrust Educational Events and Conferences
EFFECTIVE DATE: January 1, 2015	REFERENCE NUMBER: HT.004
APPROVED BY: HealthTrust Ethics and Compliance Committee	

<p>SCOPE: All departments within HealthTrust Purchasing Group, L.P. (HealthTrust LP) and its direct and indirect subsidiaries including HealthTrust-Europe LLP; the representative office of HealthTrust in Shanghai (“Shanghai Office”) (collectively, “HealthTrust”); and all Advisory Boards.</p>
<p>PURPOSE: To provide direction for participation in HealthTrust Events by Suppliers and others.</p>
<p>DEFINITIONS: Capitalized terms are defined. See back pages of this policy.</p>
<p>ESSENTIAL INFORMATION: <i>This is a summary of selected topics. Please read this entire document for full information.</i></p> <p><u>HealthTrust Events.</u> HealthTrust must be responsible for all principal arrangements. If it is an educational event, the educational components must predominate over all other activities taken together.</p> <p><u>Supplier participation.</u> <u>Exhibition booth space or sponsorships</u> may be sold by HealthTrust to Suppliers, if all are charged a like amount for like opportunities. No Supplier can be required to participate. Participating Suppliers must have a national HealthTrust Contract available to all Members at the time of the Event. Participation may not be otherwise conditioned in any way on conduct of business with the Supplier. <u>Sponsorship of a reception, dinner or the like</u> may be offered by a Supplier as part of a HealthTrust Event, or as an activity separate from the main HealthTrust Event. If separate, it should be subordinate to the main Event. The per person expense cannot exceed the cost of a Business Courtesy under Policy HT.006. If only HealthTrust Colleagues are invited, it is considered a Business Courtesy, subject to Policy HT.006. No Advisory Board or Advisory Board member may accept an invitation to a function hosted by a Supplier during a HealthTrust Event if offered solely or primarily for an Advisory Board or its members. This is to avoid providing special access to HealthTrust decision-makers for some Suppliers but not others during a HealthTrust Event.</p> <p><u>Educational or promotional programs</u> may be offered by a Supplier during a HealthTrust Event with prior written consent.</p> <p><u>Written agreements.</u> All arrangements for payments from Suppliers to HealthTrust for booth space, sponsorship, etc. must be under a written agreement at fair market value signed in advance. Payments from HealthTrust to others for Event products/services (speakers, caterers, etc.) must be under a written agreement signed in advance. In an emergency, advance verbal approval of a designated officer will suffice, with a written agreement to be executed as soon as possible after the fact. For agreements with Potential Referral Sources however, a written agreement signed in advance is always required.</p>



DEPARTMENT: HealthTrust Ethics and Compliance	POLICY DESCRIPTION: HealthTrust Events
PAGE: 2 of 7	REPLACES POLICY DATED: 08/01/04, HPG.004, Receipt of Vendor Funds for Educational Events; 11/02/12, HT.004, Supplier Participation in HealthTrust Educational Events and Conferences
EFFECTIVE DATE: January 1, 2015	REFERENCE NUMBER: HT.004
APPROVED BY: HealthTrust Ethics and Compliance Committee	

Attendees at HealthTrust Events. HealthTrust may pay costs of attendance for existing Members or Clients. HealthTrust may pay such costs for a prospective Member or Client with prior written approval.

Supplier promotional items or samples. If a Supplier provides promotional items or tokens of appreciation for distribution at an Event, and a HealthTrust Colleague receives one, it is subject to [Policy HT.006](#), if its estimated value is more than \$20. Cash or cash equivalents may not be provided by a Supplier as a promotional item or token of appreciation. Product samples are not considered gifts/Business Courtesies. All samples received by HealthTrust must be used for HealthTrust product evaluation, and must not be taken for personal use or sale.

Government officials. If a proposed speaker or invitee to an Event may be considered a Foreign Official, or an employee or representative of any government, contact the ECO.

POLICY

1. HealthTrust Events. As the principal organizer of an Event, HealthTrust must be responsible for all principal arrangements including a determination of the objectives, content and materials; selection of speakers and invitees; schedule, location and related activities, etc. For an educational Event, the educational components must predominate over all other activities taken together.

2. Supplier participation.

(a) Exhibition booth space; sponsorship. HealthTrust may raise revenue for itself through the sale to Suppliers of exhibition booth space or sponsorship opportunities at Events, but only if all Suppliers are charged a like amount for like opportunities (except where HealthTrust in its sole discretion deems appropriate, reduced prices may be charged under HealthTrust’s Supplier Diversity Program).

HealthTrust must not require any Supplier to purchase exhibition booth space, sponsor or otherwise participate in an Event. To be eligible to participate, a Supplier must have a national HealthTrust Contract available to all Members at the time of the Event (unless otherwise approved in writing by the COO or CEO, copy to the ECO). The invitation from HealthTrust to a Supplier to participate may not be otherwise conditioned in any way, express or implied, on HealthTrust’s conduct of business with the Supplier, or on HealthTrust Members’ or Clients’ purchases under any Supplier Contract. The Supplier must receive something of value in return for its participation, such as public recognition of sponsorship, use of exhibition space, and exposure to current or potential customers.

(b) Supplier-sponsored reception, dinner and the like. For Event activities such as a reception or dinner



DEPARTMENT: HealthTrust Ethics and Compliance	POLICY DESCRIPTION: HealthTrust Events
PAGE: 3 of 7	REPLACES POLICY DATED: 08/01/04, HPG.004, Receipt of Vendor Funds for Educational Events; 11/02/12, HT.004, Supplier Participation in HealthTrust Educational Events and Conferences
EFFECTIVE DATE: January 1, 2015	REFERENCE NUMBER: HT.004
APPROVED BY: HealthTrust Ethics and Compliance Committee	

funded in whole or in part by a Supplier, payment must be made by the Supplier directly to HealthTrust and not to the provider of goods or services for the activity. However, if a Supplier hosts such an activity separate from the main HealthTrust Event, and the Supplier is responsible for all arrangements (e.g., location, invitations, menu, publicity), the Supplier may pay the providers of such goods or services directly. Any such activity must be subordinate in time and focus to the main Event, and the per person cost cannot exceed the cost of one Business Courtesy Event under [Policy HT.006 – Business Courtesies Received by HealthTrust Colleagues from Others](#).

If only HealthTrust Colleagues are invited to such function, it is considered a Business Courtesy received, subject to the requirements of [Policy HT.006 – Business Courtesies Received by HealthTrust Colleagues from Others](#). No Advisory Board or Advisory Board member may accept an invitation to a function hosted by a Supplier in conjunction with a HealthTrust Event (meaning during or immediately before or after a HealthTrust Event and in the same city) if it is offered solely or primarily for an Advisory Board or its members, even if the parties were to pay their own costs. This prohibition exists to avoid providing special access to HealthTrust decision-makers for some Suppliers but not others during a HealthTrust Event.

- (c) Supplier educational or promotional events. A Supplier that is eligible to purchase exhibition booth space may offer an educational or promotional program at a HealthTrust Event with the prior written consent of the COO or Senior Vice President, Marketing and Member Services, such as a “lunch and learn” or other educational or promotional program as to its product or service offerings. (Such a program at a HealthTrust Event is not considered a business courtesy under [Policy HT.006 – Business Courtesies Received by HealthTrust Colleagues from Others](#).)

3. Written agreements.

- (a) All arrangements for payments from Suppliers for booth space, sponsorship or other arrangements for an Event must be under a written agreement (hard copy or on-line) executed in advance of the Event. Compensation may not exceed fair market value, which may include the value of marketing opportunities Suppliers may receive as assessed by HealthTrust.
- (b) Payments from HealthTrust to others for products or services relating to an Event (speakers, caterers, etc.) must be under a written agreement (hard copy or on-line) executed in advance of the Event. In an emergency however, advance verbal approval of the Senior Vice President, Marketing and Member Services or CEO will suffice, with a written agreement to be executed as soon as possible after the fact.



DEPARTMENT: HealthTrust Ethics and Compliance	POLICY DESCRIPTION: HealthTrust Events
PAGE: 4 of 7	REPLACES POLICY DATED: 08/01/04, HPG.004, Receipt of Vendor Funds for Educational Events; 11/02/12, HT.004, Supplier Participation in HealthTrust Educational Events and Conferences
EFFECTIVE DATE: January 1, 2015	REFERENCE NUMBER: HT.004
APPROVED BY: HealthTrust Ethics and Compliance Committee	

(c) For agreements with Potential Referral Sources, a written agreement signed in advance is required, and the other requirements of Policy HT.LL.001 - *Agreements with Professionals Who May Be Referral Sources*, must also be met. Verbal approval described in Policy 3(b) above is not acceptable.

4. Attendees at HealthTrust Events. HealthTrust may pay costs of attendance by an existing Member or existing Client representative at a HealthTrust Event (transportation, lodging, conference fees, entertainment, other expenses), except as otherwise provided in this subsection. HealthTrust may pay such costs for a prospective Member or prospective Client representative with prior written approval of the Senior Vice President, Marketing and Member Services, or the CEO, copy to the ECO. For Members as well as prospective Members or existing or prospective Clients, HealthTrust's payment of costs of attendance is not considered a business courtesy subject to [Policy HT.005 – Business Courtesies Given by HealthTrust to Others](#). Neither HealthTrust nor any Supplier may pay costs of entertainment in connection with a HealthTrust Event for a family member or guest of an attendee unless approved in advance by the Senior Vice President, Marketing and Member Services, or the CEO.

HealthTrust may not pay costs of attendance by a person who is or may be (i) a Foreign Official unless permitted under applicable law and Policy HT.020 - *Global Anti-corruption* and any similar HealthTrust Europe policy; or (ii) a Potential Referral Source unless handled per Policy HT.019 – *Agreements with Professionals who may be Referral Sources*; or (iii) an employee or official of any government unless permitted under applicable law. In any such case, contact the ECO or Legal Department.

PROCEDURE

1. If a Supplier provides promotional items or tokens of appreciation to be distributed at an Event, it must be clear that the items are from the Supplier. If such an item is given to a HealthTrust Colleague and its value is estimated to be more than \$20 (or the equivalent in non-U.S. currency), it is subject to requirements of [Policy HT.006 – Business Courtesies Received by HealthTrust Colleagues from Others](#). Cash or cash equivalents may not be provided by a Supplier as a promotional item or token of appreciation.

The requirements of HT.006 do not apply to product samples given by a Supplier at an Event or under other circumstances. All such samples received by HealthTrust or a HealthTrust Colleague must be used for product evaluation at HealthTrust, in an Advisory Board setting or a classroom-type setting at a healthcare provider facility, hotel meeting space or the like, and must not be taken for personal use.

2. For HealthTrust educational Events to be attended primarily by healthcare professionals, compliance with



DEPARTMENT: HealthTrust Ethics and Compliance	POLICY DESCRIPTION: HealthTrust Events
PAGE: 5 of 7	REPLACES POLICY DATED: 08/01/04, HPG.004, Receipt of Vendor Funds for Educational Events; 11/02/12, HT.004, Supplier Participation in HealthTrust Educational Events and Conferences
EFFECTIVE DATE: January 1, 2015	REFERENCE NUMBER: HT.004
APPROVED BY: HealthTrust Ethics and Compliance Committee	

appropriate accrediting body standards is recommended, even if no CEU credits are to be earned.

- If a proposed speaker or invitee to an Event is or may be considered a Foreign Official, or employee of any government, contact the ECO prior to entering into any agreement with that person.

The ECO is responsible for overseeing the 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 Courtesy Event means a social event where food and/or beverages are served; or an entertainment event such as a sport or cultural event; given by one business contact to another, 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.

CEU means a Continuing Educational Unit, including clinical, legal or other professional educational units or hours.

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.

Contract means the contract between HealthTrust and a Supplier for purchase of the Supplier's products or services by HealthTrust Members or Clients.

COO means the Chief Operating Officer of HealthTrust LP.

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

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 (e.g., a government-owned hospital or manufacturing facility), or a public international



DEPARTMENT: HealthTrust Ethics and Compliance	POLICY DESCRIPTION: HealthTrust Events
PAGE: 6 of 7	REPLACES POLICY DATED: 08/01/04, HPG.004, Receipt of Vendor Funds for Educational Events; 11/02/12, HT.004, Supplier Participation in HealthTrust Educational Events and Conferences
EFFECTIVE DATE: January 1, 2015	REFERENCE NUMBER: HT.004
APPROVED BY: HealthTrust Ethics and Compliance Committee	

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 business person. All references to Foreign Officials include family members of the Foreign Official. Examples of persons who should be treated as Foreign Officials can be found in Policy HT.020 – *Global Anti-corruption*. 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 the individual is not a Foreign Official.

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; and
- (b) a Member or Client representative who participates on an Advisory Board as a regular or associate participant.

HealthTrust Event, or Event, means a conference, trade show, and/or educational event sponsored by HealthTrust for its existing and potential Members or Clients, for which HealthTrust determines the objectives, content, educational methods and materials; selects faculty, speakers and invitees; and determines the schedule, location and related activities, including without limitation the HealthTrust University Conference, and the CoreTrust Conference.

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 it 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.

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.



DEPARTMENT: HealthTrust Ethics and Compliance	POLICY DESCRIPTION: HealthTrust Events
PAGE: 7 of 7	REPLACES POLICY DATED: 08/01/04, HPG.004, Receipt of Vendor Funds for Educational Events; 11/02/12, HT.004, Supplier Participation in HealthTrust Educational Events and Conferences
EFFECTIVE DATE: January 1, 2015	REFERENCE NUMBER: HT.004
APPROVED BY: HealthTrust Ethics and Compliance Committee	

REFERENCES HealthTrust Code of Conduct HealthTrust Supplier Business Relationship Statement Policy HT.003 – Conflict of Interest Policy HT.005 – Business Courtesies Given by HealthTrust to Others Policy HT.006 – Business Courtesies Received by HealthTrust Colleagues from Others Policy HT.007 - HealthTrust Colleague Participation in Educational, Training and Promotional Events of Others Policy HT.019 - <i>Agreements with Professionals Who May Be Referral Sources</i> Policy HT.020 – <i>Global Anti-corruption</i> <i>Rules Relating to Certain Marketing Activities (conferences, raffles, games, giveaways, marketing surveys)</i>

Version date December 9 2014