



DEPARTMENT: HealthTrust Ethics and Compliance	POLICY DESCRIPTION: Business Courtesies Received by HealthTrust Colleagues from Others
PAGE: 1 of 9	REPLACES POLICY DATED: 08/01/04, HPG.006, Entertainment Extended to HPG Colleagues; HT.006, 11/02/12
EFFECTIVE DATE: January 1, 2015	REFERENCE NUMBER: HT.006
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 (“HealthTrust Europe”); the representative office of HealthTrust in Shanghai (“Shanghai Office”) (collectively, “HealthTrust”); and all Advisory Boards.</p>
<p>PURPOSE: To establish parameters for Business Courtesies received by HealthTrust and/or HealthTrust Colleagues from Business Contacts.</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>This policy pertains to Business Courtesies received by HealthTrust or a HealthTrust Colleague from a Business Contact, not something given from one HealthTrust Colleague to another.</p> <p>Additional rules apply under Policy HT.020 - <i>Global Anti-corruption</i>, to a Colleague who gives or receives a Business Courtesy when conducting business in P.R. China, or with P.R. China nationals anywhere in the world.</p> <p>Business courtesies may be offered by a Business Contact to lawfully promote his or her business; but may not be accepted if understood by either party to be offered to obtain or retain business through the taking of improper action.</p> <p>It is always acceptable, and preferable, for a HealthTrust Colleague to politely decline to accept a Gift, or to pay the full value of his or her portion of a Business Courtesy Event.</p> <p><u>Quiet Period.</u> During the Quiet Period, no Business Courtesies may be accepted by the Advisory Board as a group or those on that HealthTrust negotiating team, from representatives of a Supplier that is responding or intends to respond to the RFP (or Invitation to Tender at HTE), except that HealthTrust or HTE employees may share a meal with such a Supplier if each party pays its own costs.</p> <p><u>The value</u> of Business Courtesies received must be modest, reasonable, customary for the location, and must not exceed the “per instance” and “per calendar year” country limits set out in <u>Appendix A</u>.</p> <ul style="list-style-type: none"> • For Events, use the limits for the country where the Event takes place. • For Gifts, use the limits for the country where the HealthTrust recipient resides. <p><u>Gifts.</u></p> <ul style="list-style-type: none"> • No cash, cash equivalents, stock, notes, etc. • Gift cards may be accepted only if:



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- 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
- A Gift received at home or by a Family Member is also subject to this policy.
- A promotional item or token of appreciation given by a Supplier to a Colleague at a professional event or conference is not considered a Gift subject to this policy, if its value is estimated to be \$20 or less.
- A product sample received by a Colleague is not considered a Gift if used for HealthTrust product evaluation and not for personal use or sale.
- Consumable Gifts (such as holiday sweets or teas) are not considered Business Courtesies, if the value of the Gift is modest, reasonable and customary for the location, and if the gift is placed in a public area of the office for all to enjoy.
- Gifts other than consumable Gifts offered to HealthTrust (rather than an individual Colleague), of any value, may be accepted only with the written consent of the CEO or COO.

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 considered to be a Business Courtesy.

Travel. HealthTrust Colleagues may not accept a Business Contact’s offer to pay travel costs as part of a Business Courtesy Event or for a business meeting, except for:

- Travel within a metro area, or to and from an airport, train station or meeting site, by car, taxi or intra-urban bus or train
- As permitted for a Colleague who acts as a speaker at a large event or who serves on an advisory board for a large event or for its organizers, or a professional association, or
- As approved if required per Appendix A of this policy.

Reporting requirements. The highest-ranking employee involved in receiving a Business Courtesy Event or group gift must report it in [EthicsTrak](#) per Procedure 4 within 30 days of receipt. Individuals must report all Business Courtesies received by them as individuals.

POLICY

1. Scope and related policies. There may be times when a Business Contact wishes to offer a Business Courtesy to HealthTrust and/or a HealthTrust Colleague to further develop a business relationship.

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HealthTrust discourages such Business Courtesies and prefers that they not be offered. It is always acceptable, and preferable, for a HealthTrust Colleague to politely decline a Gift, or to pay the full value of his or her portion of a Business Courtesy Event. (In such case, if possible, the Colleague should ask his or her manager prior to the Event if HealthTrust will reimburse the Colleague for such expense.)

2. The following restrictions apply to all Business Courtesies offered by a Business Contact to HealthTrust or a HealthTrust Colleague. This policy does not pertain to actions between HealthTrust and its Colleagues, or actions among HealthTrust Colleagues themselves.
 - (a) HealthTrust or a HealthTrust Colleague may accept a Business Courtesy in connection with activities lawfully promoting, demonstrating or explaining the Business Contact's products and services, or other legitimate business activities. No Business Courtesy may be accepted from a Business Contact if understood by either party to be offered or received 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 it could be perceived to motivate HealthTrust or a Colleague to take improper action. A Colleague may not solicit a Business Courtesy in any way, express or implied.
 - (b) The Quiet Period relates to a supplier who has responded or intends to respond to a request for proposals issued by HealthTrust (or invitation to tender/ITT issued by HTE) in a particular product category. It begins with the issuance of the RFP or ITT and ends with the award or renewal of a contract. During that time, no business courtesy may be accepted from such a supplier by the Advisory Board as a group that is charged with evaluating that category, or any person on the HealthTrust negotiating team, except that HealthTrust or HTE employees may share a meal with such a supplier if the parties pay their own costs. This exception does not apply to the Advisory Board as a group however, to avoid providing special access to HealthTrust decision-makers for some suppliers but not others during that period. Exceptions to the Quiet Period restrictions must receive prior written approval from the CEO or COO, copy to the ECO.
 - (c) Additional rules set out in Policy HT.020 - *Global Anti-Corruption, Addendum for People's Republic of China*, apply to a Colleague who either gives or receives a Business Courtesy when conducting business (i) within P.R. China and (ii) with P.R. China nationals anywhere in the world.
3. The following requirements apply to specific types of Business Courtesies, as described below.
 - (a) Gifts. HealthTrust strongly discourages the giving of any Gift to HealthTrust or a HealthTrust Colleague from a Business Contact under any circumstances. In cases where a Gift is nonetheless provided, it may be accepted only if these requirements are met:



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- (i) The total value of all Gifts given in a calendar year to an individual HealthTrust Colleague by any and all Business Contacts who are representatives of any one company and/or an organization within a company 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 HealthTrust Colleague resides. A gift sent to the home or a Family Member of a HealthTrust Colleague is also subject to this Policy.
 - (ii) The Gift must not be in the form of cash, cash equivalents, stock, checks, notes, warrants or other instruments. Gift cards are acceptable if (A) the aggregate value of all cards given to an individual HealthTrust Colleague during a calendar year by all Business Contacts from any one company or organization within a company does not exceed \$20 in the U.S., or £15 in the U.K. or E.U. (or the equivalent of \$20 if purchased with other currency); and (B) the gift card is not given in P.R. China, and the recipient is not a P.R. China national.
 - (iii) If a Supplier provides a promotional item or token of appreciation to a HealthTrust Colleague at a professional event or conference, per [Policy HT.004 – HealthTrust Events](#), it is not considered a Gift subject to the requirements of this Policy if its value is estimated to be \$20 or less.
 - (iv) A product sample given by a Supplier to a HealthTrust Colleague is not considered a Gift. All 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 facility, hotel meeting space or the like, and must not be taken for personal use.
 - (v) Consumable Gifts (such as holiday sweets or teas) received by HealthTrust, a HealthTrust department, or Colleague are not considered Business Courtesies, if the value of the Gift is modest, reasonable and customary for the location, and if the recipient makes the entire Gift available in a public area of the office for his or her department or group to enjoy.
 - (vi) Gifts other than consumable Gifts offered to HealthTrust (rather than an individual HealthTrust Colleague), of any value, may be accepted only with the written consent of the CEO or COO.
- (b) Business Courtesy Events.
- (i) A HealthTrust Colleague may accept an invitation from 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; the Business Contact host must be present;

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(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;

(C) Quiet Period restrictions as set out in Policy 2(b) shall be complied with, if applicable; and

(D) An Event that might be considered lavish or in questionable taste may not be accepted.

(ii) A Business Contact may invite the spouse, other Family Member or guest of a HealthTrust Colleague to accompany the Colleague 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 HealthTrust Colleague 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 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.

(c) Travel expenses (transportation, lodging and other travel expenses). HealthTrust and/or a HealthTrust Colleague may not directly or indirectly accept an offer from a Business Contact to provide or pay costs of travel as part of a Business Courtesy Event; or for business meetings with Suppliers, training or product demonstrations, facility tours, customer review/input meetings or panel discussions, or meetings relating to a potential or existing contract or contract renewal, 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) Travel explicitly permitted under [Policy HT.007 - HealthTrust Colleague Participation in Educational, Training and Promotional Events of Others](#), at Policy 2(a) (regarding Colleagues who serve as speakers or panelists at a large event, or on an advisory board for a large event or a professional association).

Travel other than the types set forth in (i) and (ii) above are Business Courtesies, subject to the value



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limitations and/or approval requirements set out in Procedure 3 and Appendix A. Any such required approval must be sought in writing in advance. A Supplier's offer to pay travel expenses of a HealthTrust Colleague will generally not be approved, absent exceptional circumstances.

PROCEDURE

1. To summarize, the following are not considered Business Courtesies:
 - (a) This policy applies to Business Courtesies offered by an external Business Contact to HealthTrust or a HealthTrust Colleague. 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 service; a HealthTrust conference) or among HealthTrust Colleagues themselves (manager taking employee to lunch).
 - (b) Food and beverages served *during* a business meeting are not considered Business Courtesies. See Policy 4(b)(iii) above.
 - (c) It is not a Business Courtesy if a HealthTrust Colleague who is also a Family Member or guest of a Business Contact attends an event sponsored by the Business Contact's company to which Family Members and guests are invited. For example, if a HealthTrust Colleague's husband is an employee of a Supplier, he may bring her to his company's annual holiday party, and it is not considered a Business Courtesy extended to his wife, the HealthTrust Colleague.
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 Business Contact paid more than face value, in which case the cost is the amount actually paid.
 - (b) When the cost of a HealthTrust Colleague's attendance at an Event that benefits a charitable organization is paid by a Business Contact, 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 Colleague may not pay part of the cost of an Event offered by a Business Contact that exceeds the Appendix A value limit and then participate in the Event. It is always acceptable for a Colleague to pay all of his or her costs and then participate, with his or her manager's approval.

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3. Requests for approval of exceptions. Requests for:

- (i) Advance approval to accept 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 to accept travel or payment of travel expenses by 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 a similar policy applicable to HealthTrust Europe, HealthTrust Colleagues must also follow the procedures in those policies to request an exception. Even if the request is approved, compliance with Procedure 4 directly below regarding reporting is required.

4. Reporting requirements. The highest-ranking employee involved in receiving a group Business Courtesy Event or group Gift must ensure that it is accurately reported, within 30 days of receipt, in EthicsTrak. Individuals must report all Business Courtesies received by them as individuals. Appendix B to this policy may be used by Colleagues who do not have access to EthicsTrak. False, misleading or artificial entries must not be made in the books and records of HealthTrust under any circumstances. If the 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.

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 Supplier;
- (ii) 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);
- (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.



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

Business Courtesy Event or an **Event**, means a social event where food and/or beverages are served; or an entertainment event such as a sport or cultural event; in each case given directly or indirectly by a Business Contact to HealthTrust or a HealthTrust Colleague, at which business matters are discussed and the Business Contact 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 services) 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.

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

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.



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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.

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

Quiet Period means the time beginning with issuance of an RFP (Invitation to Tender or ITT at HTE) and ending with the award or renewal of a contract to a Supplier who has responded to the RFP or ITT.

RFP means Request for Proposals.

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.005 – Business Courtesies Given by HealthTrust to Others](#)

[Policy HT.007 - HealthTrust Colleague Participation in Educational, Training and Promotional Events of Others](#)

[Policy HT.020 - Global Anti-corruption](#)

Rules Relating to Certain Marketing Activities (conferences, raffles, games, giveaways, marketing surveys)

HT.006 Business Courtesies Received by HealthTrust Colleagues from Others

Appendix A Limits by Country for Business Courtesies Received by HealthTrust from Others

The limits below reflect the maximum value that can be received by a HealthTrust Colleague from a Business Contact, per instance and per calendar year, without requesting and receiving approval of an exception per Procedure 3.

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 received or expect to receive?

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 HealthTrust recipient resides.

If the applicable country is not listed below, prior written approval of the ECO must be obtained before a Business Courtesy is received, or as soon as possible following receipt.

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 Courtesy, such as a meal followed by an entertainment in the same evening.

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Appendix B
**Gifts or Entertainment Received by HealthTrust Colleagues from Others
Disclosure Form**

If you have access to [EthicsTrak](#), please report your Business Courtesies Received using that tool instead of using this form. If you do not have access to [EthicsTrak](#), contact Lynn Egan at lynn.egan@healthtrustpg.com to obtain access. If you cannot obtain access, please complete and return this form to:

In the U.S. or China: HealthTrustEthics-Compliance@HealthTrustpg.com

In the U.K.: HealthTrustEthics-Compliance@htepg.com

Today's date _____, 20__

I received a Business Courtesy from a Business Contact as described below:

I am an Employee or Advisory Board Member

My ¼ ID, if applicable _____

My first name _____

My last name _____

My title _____

Name of my employer _____

Names of other HealthTrust Colleagues who received this Business Courtesy:

HT receiving person 2 last name _____

HT receiving person 2 first name _____

HT receiving person 2 title _____

HT receiving person 3 last name _____

HT receiving person 3 first name _____

HT receiving person 3 title _____

HT receiving person 4 last name _____

HT receiving person 4 first name _____

HT receiving person 4 title _____

(If more please use additional sheets)

Business Courtesy type:

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

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

Date received _____

Place received city/state/country _____

Offering entity type:

- Potential Member or Client
- Existing Member or Client
- Potential Supplier
- Existing Supplier
- Other

Offering entity name _____

Name of division or group within offering entity, if applicable _____

Offering person last name _____

Offering person first name _____

Offering person title _____

Per person value in currency used _____

Is the above figure an estimate? Yes No

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:

Comments if any:

Thank you.