



SOMOS HEALTHCARE PROVIDERS

POLICY NO. G-1

SECTION: COMPLIANCE

TITLE: GIFT RECEIPT POLICY

EFFECTIVE DATE: 4/11/2017

REVISION DATE:

POLICY:

The Gift Giving and Receiving policy sets forth guidelines for employees regarding the giving and receiving of gifts. Employees that are responsible for vendor relationships should make sure that vendors are aware of the policy on gifts and take the necessary steps to comply with the guidelines.

Definitions

Gift: A gift may take the form of cash, gift certificate, gift card, loan, travel, entertainment, tangible item or other type of consideration that is of personal benefit.

Nominal or Minor Value: A gift value that will not be perceived as having influenced a business decision. As a general guideline, which has been stated, \$100 or less is viewed as nominal.

Note-Business meals and entertainment, including tickets, are discussed in SOMOS Healthcare Provider's Travel and Expense policy. Entertainment tickets are not considered to be a gift.

Procedure:

If you receive a gift in conjunction with your position, regardless of its value, it should be reported to your supervisor and the compliance department via email. Information you will be asked to record includes:

- Date Received
- Name and department of individual receiving gift



- Description of gift
- Estimated value of gift
- Name/Company of sender

SOMOS Healthcare Provider's employees may accept a gift of nominal or minor value if the employee believes that the gift is not offered as a means of exerting influence on the employee's decision making and it is not in the form of cash, pre-paid card, gift card or gift certificate which are considered to be cash, or a meal or entertainment that is not attended by both a company employee and the offering customer or vendor. Frequent gift offering and/or receiving may be perceived as an attempt to influence. Employees should respectfully decline a gift if the giver's intent is in question. SOMOS Healthcare Provider's employees should contact their supervisor and or SOMOS Healthcare Provider's Compliance Officer if they have any questions regarding the acceptance of gifts or SOMOS Healthcare Provider's Gift Receipt Policy.

Non-Compliance

Non-compliance or violations of the Gift Receipt policy should be reported to SOMOS Healthcare Provider's Compliance Office immediately. SOMOS Healthcare Provider's employees may also make reports to the SOMOS Healthcare Provider's compliance hotline at 1-855-233-3135. Reports may be made anonymously.