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Required approvals	Chief Legal, Human Resources and Compliance Officer		

Corporate Compliance Manual

POLICY: Goshen Health System, Inc. d/b/a Goshen Health (“Goshen Health”), which covers all subsidiary and associated entities, including, but not limited to, Goshen Hospital, Goshen Health Surgery Center, Goshen Physicians and Goshen Home Medical, does not seek to gain an improper advantage by offering or accepting business courtesies such as entertainment, meals, transportation or lodging to customers, referral sources or purchasers of organization’s services. Colleagues should never offer or accept any type of business courtesy to a referral source or a purchaser of services for the purpose of obtaining favorable treatment or advantage. To avoid even the appearance of impropriety, Colleagues must not provide to or accept from any referral source or purchaser of services with gifts or promotional items of more than \$75.00 per person. This includes but is not limited to lunches, sports tickets, etc., which are also to be within the “per person” \$75.00-dollar limit.

Goshen Health also requires that all payments, benefits or gifts provided to any staff member or to a staff’s family member by a vendor must be reported to the Chief Legal, Human Resources and Compliance Officer.