

TITLE: Entertainment Policy	POLICY DESCRIPTION: Entertainment Extended to HPG Colleagues
PAGE: 1 of 2	TYPE: Compliance and Ethics
EFFECTIVE DATE: August 1, 2004	REFERENCE NUMBER: HPG.006

SCOPE: All HPG colleagues in all HPG departments.

PURPOSE: To establish rules related to receipt of business courtesies from Business Contacts.

POLICY: A HPG Colleague may accept Business Contact invitations to attend social events, provided: (1) the cost associated with such an event is reasonable and appropriate, which, as a general rule, means the cost will not exceed \$100.00 per person; (2) no expense is incurred for any travel cost (other than in a vehicle owned privately or by the host entity) or overnight lodging; and (3) such events are infrequent. The limitations of this section do not apply to business meetings at which food (including meals may be provided).

DEFINITION:

Business Contacts - Any representatives for Vendors, potential members, existing members, and potential referral sources to HPG members.

HPG Colleague or Colleagues:

1. Employees of HCA Management Services, LP who work full-time or part-time for HPG under a management contract; and
2. Clinical Committees and Advisory Board Members: individuals who either work full-time or part-time for HPG or are HPG member employees, and who participate on any advisory board or clinical committee for HPG.

Vendor – Any entity doing or seeking to do business with HPG.

PROCEDURE:

If it was anticipated the cost per person of a business entertainment activity would not exceed \$100, but the cost per person appears to have exceeded \$100, a report must be filed with the HPG ECO. All events occurring on the same day and offered by the same individual or entity are considered the same event and must fall within the \$100 limit. For any ticketed event, the cost of the event is the face value of the ticket unless the receiver has knowledge the Business Contact paid more than the face value, in which case the cost is the amount actually paid. For a charity event, the cost of the event is the fair market value of the activity received as opposed to the full amount of the ticket (*i.e.*, the amount of the charitable contribution may be excluded from the value of the entertainment provided to the colleague).



DEPARTMENT Entertainment Policy	POLICY DESCRIPTION: Entertainment Extended to HPG Colleagues
PAGE: 2 of 2	TYPE: Compliance and Ethics
EFFECTIVE DATE: August 1, 2004	REFERENCE NUMBER: HPG.006

Requests for advance approval to accept invitations of entertainment that exceed \$100 must be submitted to the HPG ECO and approved by the HPG President and HPG ECO. Such requests will be granted only in unusual circumstances.

It is **not** permissible to pay part of the cost of entertainment that is offered with a value exceeding \$100 to reduce the value to less than \$100 and then accept the entertainment. However, it is acceptable to pay the full value of such an entertainment activity and then participate in the event.

The HPG ECO is responsible for overseeing implementation of this policy.

REFERENCES:

- HPG Code of Conduct, July 1, 2004
- HPG Business Relationship Statement, July 1, 2004
- HPG Business Courtesies Policy, HPG.005
- HPG Vendor Promotional Training Policy, HPG.007