

**MEDRAD POLICY  
LIMITS ON GIFTS TO  
CALIFORNIA HEALTH CARE PROFESSIONALS**

**I. Purpose**

To Provide guidance to MEDRAD employees concerning the limits on gifts allowable to California Health Care Professionals in conformity with Chapter 8, Part 15 of Division 104 of the Health and Safety Code of California.

**II. Scope**

- a. Applicable to all MEDRAD, Inc. employees and representatives;
- b. Applicable to all Health Care Professionals licensed to practice medicine or prescribe drugs and medical students in the State of California.

**III. Definitions**

- a. **Health Care Professional** (“HCP”): any physician, physician practice, resident, nurse, clinician or other medical personnel, including an HCP in training or any person licensed by California state law to prescribe drugs for human patients.
- b. **Gifts**: any items, including promotional materials, or activities, including meals and hospitalities that may be provided to a HCP, excluding financial support for continuing medical education forums, payments for bona fide professional services under fee for service or research agreements in compliance with the MCMP; and financial support for health educational scholarships.

**IV. Related Policies and Guidelines**

- a. MEDRAD Code of Business Conduct
- b. AdvaMed Code of Ethics

**V. Application**

- a. MEDRAD employees may offer occasional modest gifts to California HCPs provided:
  - i. The gift is intended for an educational purpose; and
  - ii. The gift has a fair market value of less than \$100.



- b. MEDRAD employees may also offer occasional branded gifts or promotional materials to California HCPs provided:
  - i. The branded gift or promotional item is of minimal value; and
  - ii. It benefits the HCP's professional work and/or patients.
- c. Aggregated gifts from all MEDRAD sources shall not exceed \$400 annually to any individual HCP.

## **VI. Enforcement**

All violations of this policy shall be reported to the Compliance Department, which will investigate the violation. An individual's supervisor and/or manager may assist in the investigation process. Violations of this policy may result in disciplinary action including probation or termination as necessary to protect MEDRAD. Violations may also result in fines or other punishment imposed by the State of California.