

Anti-Corruption, Gifts & Entertainment Policy

1. Purpose Community Hospital Advisors, Inc. is committed to conducting business ethically and in full compliance with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), UK Bribery Act, and local laws. We prohibit bribery, corruption, and improper payments in any form.

2. Scope This Policy applies to all employees, officers, directors, contractors, agents, and third parties acting on behalf of Community Hospital Advisors, Inc. worldwide.

3. Key Prohibitions

- **No Bribery or Corruption:** You must not offer, promise, give, request, accept, or authorize anything of value (directly or indirectly) to improperly influence any person, including Government Officials or commercial partners, to obtain or retain business or secure an improper advantage.
- **Government Officials:** Broadly defined to include employees/officers of governments, state-owned entities, public international organizations, political parties, or candidates.
- **Facilitation Payments:** Prohibited (small payments to expedite routine government actions).
- **Third-Party Intermediaries / Commissions:** You must not use agents, consultants, or others to make prohibited payments. All third parties must undergo due diligence, agree to anti-corruption terms, and payments must be reasonable, documented, and for legitimate services. Commissions or fees must reflect actual value provided—no kickbacks or hidden benefits.
- **Books & Records:** All transactions must be accurately recorded—no false entries or off-books accounts.

4. Gifts, Entertainment & Meals Modest, occasional gifts/entertainment can build relationships but must never influence decisions improperly. **General Rules (All Cases):**

- Must be transparent, infrequent, reasonable, and for legitimate business purpose.
- Must comply with local laws and recipient's policies.
- No cash, cash equivalents (e.g., gift cards), or anything lavish/embarrassing.
- Recipient must be present (no standalone gifts/entertainment).
- Never during bidding, negotiations, or tenders.

Approval Thresholds (Pre-approval required; submit to Compliance/Legal):

Recipient Type	Type	Threshold Requiring Pre-Approval	Approver(s) Required
Government Official / State-Owned Entity	Any Gift/Entertainment/Meal	Any value	Compliance/Legal (always)
Commercial Partner (customers, suppliers, etc.)	Gift/Entertainment/Meal	> \$100–\$250 per person (adjust per local risk)	Supervisor + Compliance (if over threshold)

Examples of Allowed (if approved and modest): Logo pens/mugs, working meals, reasonable event tickets with business discussion. **Prohibited Examples:** Excessive travel, adult entertainment, cash, or anything creating appearance of impropriety.

5. Reporting & Consequences Report suspected violations immediately to Compliance, Ethics Hotline, or supervisor (anonymous options available). No retaliation for good-faith reports. Violations may result in disciplinary action up to termination, and potential civil/criminal penalties.

6. Training & Review All relevant personnel receive periodic training. This Policy is reviewed annually or as laws change.