MAIMONIDES HEALTH

CODE: COMPL-013 (Reissued)
DATE: July 21, 2026
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SUBJECT: GIFTS & INTERACTIONS WITH INDUSTRY

I. POLICY

Maimonides Health is committed to ensuring that all employees, contractors, volunteers, students, trustees, medical staff members, and other persons performing work for or at Maimonides Health ("Personnel") comply with federal and state laws, including, without limitation, the federal and state Anti-Kickback Statutes, the Self-Referral Statutes, and the Civil Monetary Penalty statutes, that prohibit the acceptance of any item of value (e.g. cash, prizes, meals, etc.) that might induce (or appear to induce) the purchase or referral of any health care goods or services reimbursed federal and state health care programs like Medicare and Medicaid.

Under the federal Open Payments Program (the "Physician Payment Sunshine Act"), drug and device manufacturers are required to report any payments (or transfers of value) made to Covered Providers or teaching hospitals. Covered Providers should review this information before it is made publicly available on the Open Payments Program website. Moreover, Covered Providers should maintain accurate records of these kinds of payments or transfers of value in order to aid in the Center for Medicare & Medicaid Services's review and dispute process, and also as a basis for financial interest disclosures as required by Maimonides Health's conflicts of interest policies. This Policy applies to conduct with Industry whether or not the particular Industry entity actually does business with Maimonides Health.

This Policy is intended to provide parameters for appropriate decision-making regarding the acceptance or provision of Gifts and other interactions between Personnel and third-parties. Except as set forth in this Policy, Personnel may not accept or solicit gifts from any third-parties with which Maimonides Health conducts (or may conduct) business. When evaluating the acceptance or provision of Gifts, you should also consult the Conflict of Interest policy (COMPL-020), which contains certain disclosure provisions/obligations to mitigate potential or actual conflicts of interest that might arise. Any questions regarding whether a particular relationship, gift, or gratuity would be appropriate in a specific circumstance should be directed to the Chief Compliance Officer ("CCO") and/or the Executive Vice President & General Counsel.

II. SCOPE

This policy applies to all employees, contractors, volunteers, students, trustees, and medical staff members of Maimonides Health Resources, Inc. and its subsidiaries and affiliated entities, including, without limitation, Maimonides Medical Center, Maimonides Midwood Community Hospital, Community Care of Brooklyn IPA, Inc., Brooklyn Communities Collaborative, Inc., MMC Holding of Brooklyn, Inc., Maimonides Research and Development Foundation, and M2 Medical Community Practice, P.C. and its affiliated captive entities (collectively "Maimonides Health" or "Maimonides").

III. DEFINITIONS

Anti-Kickback Statutes: Federal and state laws that prohibit the knowing and willful exchange (or offer to exchange) of anything of value (e.g., cash, etc.) for patient, product, or service referrals

reimbursable under a federal or state health care program. This prohibition extends to the purchasing, leasing, or ordering of any healthcare goods and services.

Civil Monetary Penalty statutes: Federal and state laws prohibiting fraud and abuse involving federal and state health care programs.

Covered Providers: For purposes of the Open Payments Program, includes physicians, physician assistants, nurse practitioners, clinical nurse specialists, certified registered nurse anesthetists and anesthesiologist assistants, and midwives.

Family Member: Any spouse, domestic partner, brother or sister (whether whole- or half-blood), child (whether natural, adopted, or foster), grandchild, great grandchild, or spouse or domestic partner of a brother, sister, child, grandchild or great grandchild.

Gift: Anything of value provided free of charge or at a discount, including cash, cash equivalents (e.g, checks, gift certificates, stocks, bonds, etc.), prizes, meals, membership dues, tickets to sporting or entertainment events, recreational or social activities (use of personal property or real estate), promotional items (e.g., pens, calculators, notepads, coffee mugs), flowers, food and beverage (e.g., box of chocolates, wine), Vendor invitations to social events or other activities with no educational purpose, honoraria, discounted goods or services, preferential rates or forgiveness of debts or loans, or anything reasonably regarded as providing a financial gain or advantage to either the recipient or his/her Family member. Gifts also include any meals, food or beverage provided by Industry to Personnel on or off Maimonides' premises.

Industry: Pharmaceutical, biotechnology, medical device and other health care related entities and their employees, representatives and agents.

Personnel: Trustees, directors, employees, medical staff members, physician office staff, contractors and other persons performing work for or at Maimonides.

Sample or Drug Sample: Pharmaceutical products obtained free of charge or at a discount from Industry representatives to be used for the benefit of patients.

Self-Referral Statutes: Federal Stark Law and analogous state laws that prohibit physicians and other health care providers from making referrals (and seeking reimbursement under federal and state health care programs) for certain health services to an entity with which the practitioner (or an immediate family member) has a financial interest unless an exception applies.

Contractor: A company and/or its employees, representatives, or agents (including Industry representatives) or any other person that provides (or seeks to provide) goods or services to Maimonides, or does business (or seeks to do business) with Maimonides.

IV. PROCEDURES/GUIDELINES

Personnel may only accept Gifts in accordance with this Policy. This Policy does not prohibit the exchange of Gifts among Personnel who have independent personal relationships (e.g., holiday, birthday), provided the Gift is not intended to influence the status of the individual giving the Gift. Any such Gifts should be purchased with employee's personal funds, and not with Maimonides' funds. Certain Personnel have to report such Gifts for tracking purposes when provided to a

potential referral source even when such Gifts are provided for social, benevolence, or congratulatory reasons.

A. Patient Gifts

Although this Policy prohibits the acceptance of Gifts, on occasion Personnel may be offered Gifts from patients, former patients, their friends or family members in appreciation for the management and care of a patient. Personnel may only accept such Gifts in accordance with the following guidelines:

1. Personnel may accept unsolicited Gifts of nominal value (e.g., flowers, food, fruit baskets) from patients and their families provided the Gift is shared with other members of the department, unit or division, and the Gift is not related to past or anticipated preferential treatment.
2. Personnel may accept unsolicited Gifts of nominal value if refusal to accept the Gift could hurt a patient's feelings or otherwise be counterproductive to a patient relationship.
3. Personnel may not accept Gifts containing alcohol under any circumstances.
4. Personnel may not accept Gifts of cash, gift cards or certificates, gratuities, or other monetary equivalents of any kind for any reason. In instances where a patient and/or the patient's family want to express their appreciation through a monetary Gift, Personnel should suggest that that they make a donation to Maimonides instead. Personnel should refer the patient/family to the Office of Development in order to make their donation.

In the event Personnel are offered or receive a Gift and are unable to refuse acceptance or return the Gift, the matter should be disclosed to the Personnel's supervisor. If the Gift is in the form of a check or cash, the Gift-giver should be informed that the Gift will be delivered to the Office of Development for processing and Personnel should immediately contact the Office of Development at 718-283-8113 or development@maimo.org and provide location and contact information for pick-up of the Gift including the full name and address of the Gift-giver, so that a receipt can be provided.

B. Community Outreach and Education

Maimonides may, with the approval of Marketing and Communications, develop items of nominal value (e.g., pens, notepads, calendars, etc.) that promote awareness of clinical programs for referral sources or patients consistent with Maimonides' mission to provide community outreach and education.

C. Governmental Officials

Personnel may not offer Gifts of any kind (even of nominal value) to any governmental official for any reason. Such gifts could be misinterpreted as an attempt to improperly influence an official and must be avoided.

D. Gifts From Industry

Gifts from Industry are prohibited regardless of value because they may be viewed to influence or potentially influence Personnel in the conduct of their duties or responsibilities. Gifts that are impermissible when given to Personnel are also impermissible when given to such Personnel's Family Members or guests. Personnel must consciously and actively separate clinical care

decisions (including referrals, and diagnostic or therapeutic management) from any perceived or actual benefits accrued or expected from Industry including, but not limited to, research funding, scholarships for Continuing Medical Education ("CME") attendance, and any compensation agreement.

Personnel may not accept Industry-funded meals, food, or beverage of any nature or value, except under the following limited exceptions:

1. Faculty providing compensated consulting services off-premises as an outside professional activity may accept modest meals funded by Industry, provided that they adhere to Maimonides' Conflict of Interest (COMPL-020) and Conflicts of Interest in Human Research & PHS Funded Research (RES-021) policies. Pursuant to these policies, Personnel must report the monetary value of meals funded by Industry, and the value of such meals, food, or beverage may be reportable under the Physician Payment Sunshine Act.
2. Meals, food or beverages provided incidental to educational programs accredited by the Accreditation Council for Continuing Medical Education (ACCME), or other event that comply with the ACCME Standards for Integrity and Independence in Accredited Continuiting Education, may be accepted. Such meals must be modest, provided for the purpose of promoting interaction and exchange between faculty and learners, and in all other respects must comply with Maimonides' Continuing Medical Education (ACDM AFFAIRS-012) policy.
3. Meals provided to staff by a Vendor during training by that Vendor for a product that has already been purchased are acceptable. This exception is limited to only medical devices and equipment and does not apply to pharmaceuticals/drugs.

E. Industry Support for Maimonides Sponsored CME and Other Events

Unrestricted subsidies to underwrite the cost of Maimonides continuing undergraduate and graduate medical education conferences or professional meetings can contribute to the improvement of patient care. All educational events sponsored by Maimonides that use Industry support must comply with the Accreditation Council for Continuing Medical Education (ACCME) Standards, whether or not CME credit is awarded, unless Food and Drug Administration ("FDA") related or similar training is provided. Industry may be acknowledged for its donations or grants in a manner consistent with the ACCME Standards.

In addition to the ACCME Standards, educational events sponsored by Industry on Maimonides' campus or other designated locations should comply with the following provisions:

1. Gifts of any type may not be distributed to attendees or participants before, during, or after the meeting or lecture;
2. Educational events must clearly separate education from promotional activities (e.g., separate commercial exhibits from the educational space, do not include distribution of advertisements or literature on their product during an educational session, separate commercial advertising from educational content in an internet-based CME presentation) to ensure that activities do not promote the interests of product manufacturers;
3. The sponsoring Vendor(s) may be credited for contributing to an unrestricted educational grant;

4. Funds from Industry to support the specific educational activity must be provided to the Department or Program rather than an individual faculty member.

The following provisions apply to the planning and organization of the event:

1. **Solicitation:** Industry support may be solicited only for charitable, educational, academic or other appropriate purposes (e.g., trainee educational sessions), and must be approved by the Department Chair, the Office of Development, Marketing and Communications, and Maimonides Research and Development Foundation (MRDF) (if applicable). Such solicitation shall be made to all companies similar in nature to the one solicited, not just those doing business or potentially doing business with Maimonides. Furthermore, such solicitation must clearly indicate that Industry support is not a factor in vendor selection.

   Solicitation discussion must not involve Personnel with vendor or product recommendation roles (e.g., member of Maimonides' Pharmacy and Therapeutics Committee and/or the Antimicrobial Stewardship Committee) or Industry sales and marketing personnel unless no other communication option is feasible. Vendors in active contract negotiations with Maimonides may not be solicited. Funds may not be solicited from Vendors for non-educational events such as graduation and holiday parties.

2. **Permitted Uses of Industry Support:** Industry is permitted to support education and other Maimonides projects and events, including but not limited to, research, patient related activities (e.g., refreshments at patient support group) and fundraising projects that further the charitable mission of Maimonides. Funds may not be accepted from Contractors for non-educational events such as graduation and holiday parties. Such Industry support must be accompanied by a written certification from the appropriate Industry official that the support is provided to support education or a project or event that furthers the charitable mission the Maimonides and that such Industry support is not being provided to influence purchasing decisions or research outcomes.

   Industry support for patient related equipment and supplies (e.g., prosthetic devices) must be approved through Maimonides' Procurement Department. The contributing Contractor(s) may be credited for contributing to an unrestricted patient related grant.

   Industry may direct its support to fully or partially fund an individual event, project or ongoing educational or charitable program of Maimonides, but must indicate its request in its written certification. However, Maimonides shall plan, operate and control all aspects of any such program in a manner consistent with the ACCME Standards (including, but not limited to, the provision of any food or beverages at such program, the selection of the program's content, faculty, attendees, educational methods and materials). Speakers must be paid directly by Maimonides and not by the sponsoring Contractor.

3. **Product Training/Evaluation:** Industry support for a genuine, bona fide product education program or product symposium which by its nature may involve identification of an Industry name, logo or product is permitted if managed to eliminate or minimize the potential for advertising or other promotion.

4. **Product Fairs or Similar Program:** Product fairs or similar promotional programs are allowed as long as these activities follow the ACCME Standards. Individuals who are

faculty members must not be paid by Industry to do promotional speaking or to be on Industry-funded speakers' bureaus. In addition, such promotional events must meet the following criteria:

i. The talk is not promotional in nature, but purely educational; and
ii. Industry has no role in determining or approving presentation content.

5. **Industry Financial Support:** Industry support for a Maimonides event or project must not be made payable to Personnel but must be made payable to Maimonides and sent to the Finance Office, Grants and Contracts Department, or MRDF, as applicable. Checks received from Industry must be deposited into a separate special purpose fund. All new accounts will be set up by the Finance Department. The Maimonides department responsible for securing the support will request the special purpose fund. Allocation to departmental accounts may be performed pursuant to the policies and procedures of the Finance Department.

   In addition, the persons using the Industry support for a particular project or event must be able to document and provide the following information to the Office of Corporate Compliance ("OCC"):

   i. The amount, source and date of the Industry support received from Industry;
   ii. The project or event receiving Industry support;
   iii. The use of the Industry support; and
   iv. Who determined the use of the Industry support funds.

F. Attendance and/or Participation by Personnel in Industry Sponsored or Supported Professional Meetings that are Not Sponsored by Maimonides

Clinicians are expected to participate in meetings of professional societies as part of their CME and professional obligations. Personnel with special expertise may be invited to give lectures or otherwise participate in conferences and seminars in a variety of venues outside Maimonides. However, clinicians should be aware of the potential influence of Industry at these meetings. Industry support must never compromise academic independence or be presented such that one could infer that the purpose of the support of a meeting or conference was to induce or influence any favorable business action. Discretion must be employed in determining whether to attend, based on whether the event has a legitimate educational value when certain requirements are met as described below:

1. **For Attendees**-Prior to attending an educational meeting or conference, the following requirements must be followed:
   i. The event is offered by a professional society, academic institution or complies with the ACCME Standards or involves either training of the safe and effective use of a medical product and/or discussed non-promotional clinical educational information to further medical care;
   ii. Financial support by Industry is fully disclosed at the meeting by the sponsor;
   iii. The event, agenda, and presentations are not determined by Industry;
   iv. No Gifts, compensation, travel, meals, or lodging may be accepted from Industry for attending an educational meeting or conference except for modest meals provided in compliance with ACCME Standards (e.g., incidental to attendance of an off-site event) as well as Maimonides' policies on Continuing Medical Education (ACDM

AFFAIRS-012) and CME Faculty Honoraria and Travel Reimbursement (ACDM AFFAIRS-013);

v. Presenters are required to disclose that their presentation consists of the presenter's own studies and conclusions and such studies and conclusions promote evidence-based clinical care;
vi. Personnel must not accept any Gifts from Industry at such events;
vii. Industry support must not be displayed in presentation or education spaces; and
viii. The setting and cost of the event must be appropriate for its purpose.

2. **For Participants-**Personnel who actively participate in meetings and conferences supported in part or in whole by Industry (e.g., giving a lecture, organizing the meeting, participating in FDA-related training), must follow these additional requirements:
   i. The meeting or conference content is determined by the participant and not the Industry Sponsor unless FDA or research related training is provided;
   ii. The participant must provide a fair and balanced assessment of therapeutic options and promote objective scientific and educational activities and discourse;
   iii. The participant may not be required by an Industry Sponsor to accept advice or services concerning content, speakers, or other educational matters as a condition of the sponsor's contribution of funds or services;
   iv. The participant is prohibited from allowing professional presentations of any kind, oral or written, to be ghostwritten by any party, Industry, or otherwise;
   v. The participant must explicitly describe all of the participant's related financial interests (i.e., past, existing, or planned) to the audience or explicitly declare that the participant has no related financial interests;
   vi. The participant must state that the participant's statements reflect the participant's individual views and not the views of Maimonides unless approved by the participant's Chair and the Marketing and Communications Department.
   vii. The participant may accept reasonable payment for travel, meals, lodging and honorarium consistent with fair market value, but reimbursement of Family Members or guests' travel, meals, lodging and/or other expenses is prohibited.
   viii. Time spent in preparing and delivering the lectures does not impair the participant's ability to fulfill their Departmental or other responsibilities; and
   ix. Use of Maimonides' name at a non-Maimonides event complies with policies regarding the use of Maimonides' name.

Any questions concerning the appropriateness of a particular event or function, or reimbursement of expenses in connection with such activities should be directed to the Corporate Compliance Department.

G. Industry Sponsored/Supported Honoraria and Consultations

In the event that any Personnel are invited by Industry to speak or provide genuine consulting services, such Personnel may be able to accept reimbursement in the form of an honoraria or compensation for time and expenses as long as such Personnel comply with the following requirements:

1. *Prior to accepting any engagement*, speak with and receive approval from the head of the Department, and then the CCO, and the Executive Vice President, Medical Affairs (as applicable);
2. Presentations or consultation engagements must be of scientific/academic merit and/or benefit Maimonides;
3. Presentations cannot be promotional in nature, but purely educational, and the Industry must have no role in determining or approving presentation content;
4. Personnel are prohibited from receiving compensation for listening to a sales pitch by an Industry representative;
5. Personnel must not receive any form of compensation for changing a patient's prescription;
6. Personnel may only accept fair market value compensation fees for specific, legitimate services provided by you and for work actually performed. Payment must be commensurate with time and effort and the terms of the arrangements and the services provided. Compensation must be set forth in advance and in writing. Any reimbursement for travel, lodging, and meal expenses must be reasonable and directly related to the engagement;
7. Acceptance of any Industry honoraria or consultation engagement is contingent on prior approval from the appropriate administrative director, Chair, or similar position. A Chair requires such approval from the Executive Vice President, Chief Medical Officer;
8. If any Personnel's MMC responsibilities includes procurement decision-making capacity, such Personnel should refrain from having private business relationships with Vendors selling such products and follow Maimonides' Conflict of Interest (COMPL-020) policy and, if applicable, the Conflicts of Interest in Human Research & PHS Funded Research (RES-021) policy.
9. Any time spent on a consultation or service agreement must be performed on non-Maimonides' time (i.e., vacation time) unless otherwise approved by a Chair or someone in a similar position (Vice- President or above). A Chair requires such approval from the Executive Vice President, Chief Medical Officer.
10. Industry compensation must be disclosed in accordance with Maimonides' Conflict of Interest policy (COMPL-020) and Conflicts of Interest in Human Research & PHS Funded Research (RES-021) policy, as applicable.
11. In the event Maimonides' resources, such as work time, computers, and library, are involved in the consultation, you must consult existing Maimonides policies. It is considered improper to use Maimonides resources, especially computer resources, for non-Maimonides purposes beyond incidental de minimis use.

H. Pharmaceutical Industry Sales Representatives and Drug Samples

Many of Maimonides' facilities licensed under Article 28 of the New York Public Health Law prohibit or severely restrict the use of Drug Samples at their sites. In other areas (e.g., medical offices), clinicians licensed to prescribe and dispense medications may accept Drug Samples from Industry for distribution to patients.

Distribution to persons other than patients carries the inference that such Drug Sample is a Gift and carries risk to your professional reputation. Accordingly, Personnel who interact with Industry representatives concerning Drug Samples are strongly discouraged from accepting Drug Samples unless they pose significant benefits, are generally not used by the general

population often, are usually needed quickly and whose benefits outweigh the regulatory, safety, security and other risks posed by such Drug Samples.

Drug Samples should be closely coordinated, monitored and logged by the Practice Administrator or Nurse Manager at each site to avert any potential risks involved. The log should contain the list of Drug Samples received, their expiration dates, lot numbers/serial numbers and the clinician who received the Drug Samples. Any Drug Sample given out to patients should be documented within the Electronic Medical Record with its lot/serial number. Offering Drug Samples to patients for "off-label' uses is strictly prohibited.

Drug Samples shall never be sold and any Drug Sample shall not be used by you for yourself or Family Members or anyone other than a patient in need of the particular Drug Sample.

V. CONTROLS

Hospital and site managers and Department Chairs shall be responsible for helping to enforce this Policy. All violations are to be reported to OCC for appropriate resolution, which may include disciplinary sanctions, up to and including termination, for noncompliance with this Policy.

The OCC will monitor compliance with this Policy.

REFERENCES:	Code of Conduct COMPL-020 Conflict of Interest RES-021 Conflicts of Interest in Human Research & PHS Funded Research ACDM AFFAIRS-012 Continuing Medical Education (CME) ACDM AFFAIRS-013 CME Faculty Honoraria and Travel Reimbursement FIN-017 Request and Reimbursement for Travel
INDEX:	Gifts, CME, Industry, Vendor, Samples
DEPARTMENT RESPONSIBLE:	Corporate Compliance
ATTACHMENTS:	n/a