

## ARTHREX GIFT POLICY

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Gifts by Arthrex employees or agents to customers are generally prohibited. There is an exception to this general rule for:

- Occasional modest gifts to Health Care Professionals (HCPs), but only if the gift benefits patients or serves a genuine educational function for HCPs. Other than medical textbooks or anatomical models used for educational purposes, any such item should have a fair market value of less than \$100.\*

A Company may not give HCPs items that are capable of use by the HCP (or his/her office staff, family members or friends) for non-educational or non-patient-related purposes. Examples of these items include a DVD player or MP3 player/i-Pod.

A Company may not give HCPs any type of non-educational branded promotional items, even if the item is of minimal value and related to the HCP's work or for the benefit of patients. Examples of non-educational branded promotional items include pens, notepads, mugs, and other items that have a Company's name, logo, or the name or logo of one of its Medical Technologies.

A Company may not give HCPs gifts such as golf balls, tee shirts, cookies, wine, chocolates, meals, snacks, other refreshments, flowers, gift baskets, holiday gifts, cash, or cash equivalents/gift certificates.

Gifts may not be given as a "thank you" for the purchase of Arthrex products.

Gifts may not be given to recognize a life event, such as a wedding, birth, anniversary, or death of a family member.

\*The \$100 limit is intended to be a per-gift amount; however, consideration should be given to the frequency of providing gifts to any one HCP. For example, repeated gifts to the same HCP, each with a value below the \$100 threshold, should be avoided.