

Arthrex Gift Policy

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

- 1) occasional modest gifts, but only if the gift benefits patients or serves a genuine educational function; and*
- 2) branded promotional items of minimal value related to the customer's work or for the benefit of patients.*

Value, Frequency and Purpose of Gifts

Gifts must benefit patients or serve a genuine educational function. Except for medical textbooks or anatomical models used for educational purposes, the fair market value of any gift must be less than \$100. 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 individual. For example, repeated gifts to the same person, each with a value below the \$100 threshold, as well as gifts to multiple members or staff of a customer, should be avoided. Gifts may not be given in the form of cash, cash equivalents, or gift certificates. Gifts that do not benefit patients or serve a genuine educational function, such as food, flowers, wine, or other refreshments, are prohibited. Gifts may not be given as a "thank you" for the purchase of Arthrex products. Modest gifts may be given to consultant physicians in recognition of their service.

Low Value, Branded, Promotional Items

It is occasionally permissible to give minimal-value, branded, promotional items related to the customer's work or for the benefit of patients. This includes items such as pens and notepads. However, things such as **golf balls and tee shirts** are not allowed because they are neither related to the customer's work nor for the benefit of patients. Gifts such as flowers, gift baskets, meals, snacks, wine, or other refreshments to a customer also are not considered related to the customer's work or for the benefit of patients, and therefore are prohibited.