Dialysis Regulatory and Ancillary Policies & Procedures

Policy: 3-03-115

DaVita HealthCare Partners Inc.

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

TITLE: VENDOR ATTENDANCE AT DAVITA EVENTS

PURPOSE: To establish guidelines for Vendor participation at DaVita-hosted events

SCOPE: This does apply to national, divisional and/or regional meetings.

DEFINITION(S):

DaVita-hosted event: DaVita National Meetings, Villagewide, Academy, Physician Leadership Meetings (PLM), and Annual Divisional Meetings.

Vendor: Persons or organizations that provide, or seek to provide, goods or services directly to DaVita patients, DaVita teammates, or DaVita or one of its affiliated entities.

POLICY:

- 1. DaVita may invite Vendors to attend DaVita-hosted events for educational or other legitimate business purposes.
- 2. DaVita may accept financial support to offset additional costs associated with Vendors' attendance at DaVita-hosted events, if the:
 - a. Financial support does not exceed the actual costs associated with the Vendors' attendance; and
 - b. Event organizer has obtained written approval from the Compliance Department (Team Quest).
- 3. DaVita may have Vendors provide educational presentations at DaVita-hosted events in accordance with DaVita's *Vendor Training for Teammates* policy (available on the eP&P site Dialysis Regulatory and Ancillary Policies & Procedures folders).
- 4. Vendors may not provide teammates or other DaVita-hosted event attendees giveaways, gifts or other items of value that exceed DaVita's *Gift* policy (available on the eP&P Dialysis Regulatory and Ancillary Policies & Procedures folders).

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PROCEDURE:

A. Financial Support Proposal – Compliance Approval

- 1. Four (4) or more weeks prior to inviting Vendors to attend DaVita-hosted event, Event organizer:
 - a. Completes a *Vendor Exhibitor Proposal Form* (available on the Team Quest webpage on the VillageWeb);
 - b. Prepares an invitation letter (sample letter available on the Team Quest webpage of the VillageWeb); and
 - c. Sends the completed *Vendor Exhibitor Proposal Form* and invitation letter to Team Quest (email QUESTionline@davita.com).
- 2. Upon receipt of a proposal, Team Quest will:
 - a. Review the request; and
 - b. Provide the Event organizer approval or additional guidance.
- 3. Event organizers whose proposals are approved must submit a Post-Meeting Report (available on the Team Quest webpage on the VillageWeb) to Team Quest email:
 - a. QUESTionline@davita.com no later than 30-days after the DaVita-hosted event.

Teammates are expected to report possible violations of this policy and procedure. You may make your report to an appropriate DaVita manager or to the Corporate Compliance Hotline (888-458-5848 or DaVitaComplianceHotline.com). DaVita has a Non-Retaliation policy and will not tolerate any form of retaliation against anyone who files a Compliance report in good faith. Reports can be made anonymously or you may request confidentiality. Questions regarding this policy should be directed to the QUESTionLine at 855-687-9645 or QUESTionLine@davita.com