

Internal Audit,
Compliance, and Enterprise Risk Management

Effective Date: March 29, 2005
Reissue Date: 4/1/2024

Acceptance and/or Solicitation of Gifts or
Benefits from Vendors, Patients, or Other
Third Parties

NYU Langone Health is committed to ensuring ethical and compliant behavior that does not violate federal and state laws and regulations surrounding gift-giving and other activities between NYU Langone Health and non-NYU Langone Health individuals or entities. This Policy provides guidance for Members of the NYU Langone Health Community in an effort to ensure that Individuals are able to perform their job responsibilities and make objective decisions that are in the best interest of NYU Langone Health and its employees and patients, free from undue influence.

To provide guidance regarding appropriate practices for receiving gifts and responding to Vendor invitations that is in compliance with all applicable federal and state laws and regulations and NYU Langone Health policies.

This Policy applies to employees, trustees, officers, faculty, medical staff, residents, fellows, students, volunteers, trainees, vendors, contractors, subcontractors, independent contractors, consultants, sponsored individuals, and agents of NYU Langone Health.

: federal and state laws which prohibit the knowing and willful, direct or indirect, exchange (or offer to exchange), directly or indirectly, of anything of value in cash or in kind for patient, product, or service referrals, or to induce referrals. This prohibition extends to any purchasing, leasing, ordering, arranging for or recommending any purchasing, leasing, or ordering of any goods and services.

: refers to anything of value accepted from a patient,

Vendors are prohibited from directly placing any promotional or educational materials in any patient care area or waiting area of any NYU Langone Health inpatient or outpatient site. Educational materials must be given to the department manager, director, administrator, or their designee, for review and will be distributed to patients at such individual's discretion.

Gifts and Grants to Support Research or Education

Gifts or grants from Vendors to support research or education may be accepted by NYU Langone Health only if:

- 1) the Gift or grant is accompanied with the Vendor's written certification that the Gift or grant is given to support NYU Langone Health research or education and is not intended to influence purchasing decisions or research outcomes. The certification should be submitted to the Office of Development or the Office of Science ~~and~~ dao1(0v4 2 (d3 3)3 e45T76)624 ((U)--4 ()-1 5.9 -7 91

- 1) the selection of Individuals who will receive proceeds from the fund is made by NYU Langone Health personnel,
- 2) the conference or meeting meets the definition of “appropriate”,
- 3) the Gift is approved by the Office of Development or the Office of Science and Research, as appropriate, and
- 4) the subsidy is paid direc

from providing or offering Gifts or Benefits of any kind with the intent of influencing government officials. Individuals, who are approached by government representatives with requests or demands for any kind of Gift or Benefit from NYU Langone Health, should immediately report it to IACERM or the Office of Legal Counsel.

NYU Langone Health is prohibited from making direct campaign contributions or sponsoring Members of the NYU Langone Health Community at political fundraising events. However, Members of the NYU Langone Health Community may make contributions using their own personal funds.

Any requests related to lobbying for a specific cause, inviting government officials to events, providing meals, or purchasing tables (or similar) for fundraising events should be coordinated through the Office of Government and Community Affairs.

The Office of Internal Audit, Compliance, and Enterprise Risk Management has general responsibility for implementation and enforcement of this Policy. Individuals who are found to be non-compliant with applicable federal, state and local laws and regulations, professional standards, and institutional policies may be subject to disciplinary action up to and including termination of employment or (n) Tj(a) 15 357(m), C(0) 1 t0.)-2 (nc (e)4 (5.4((di)-2 (na)4 (t)-TJ0 Fs)1 s)-1 (Tj[(1)-271 0 Td H)

