

Preventing Global Corruption

Interactions with Healthcare Professionals and Government Officials

Compliant business interactions with healthcare professionals and government officials support a positive business environment for Owens & Minor Distributors. In many countries, healthcare professionals (HCPs) are also government officials (GOs). Your interactions with them are subject to strict anti-corruption laws.

KEEP IN MIND

- You may not offer or give anything of value, directly or indirectly, with an illicit intent (to obtain or retain business) to healthcare professionals or government officials. This includes exploiting personal relationships for business benefit.
- You may be held responsible for any attempted or actual corruption violations or actions taken in support of it. It does not matter if the bribe was successful or not.

Conflicts of Interest

Disclose all potential conflicts of interest between your employees and HCPs/GOs to O&M and to the appropriate local and regional governments and healthcare organizations. It is always okay to ask someone if they are to be considered an HCP or GO.

Meals, Hospitality, and Travel

In certain circumstances, reasonable and documented meals, hospitality, and travel may be provided to a HCP/GO in connection with professional product or service education. Meals should be modest and provided in a location conducive to facilitating business. Entertainment or recreation should generally not be provided.

Gifts and Educational Items

No gifts should be given to HCPs or GOs, except when it is explicitly permitted by local laws or customs and does not exceed legal and customary value. Depending on country laws and regulations, gifts of nominal value (i.e., holiday chocolates, greeting cards, or educational items that benefit a patient) may be permitted.

Charitable Donations

Charitable donations must be provided to legitimate organizations with charitable intent. They may not be used to influence the use or purchase of products or services. Retain detailed documentation when providing a charitable donation.