

Memo to all Centers Health Care Vendors

Dear Vendor,

Please see the attached policy that has been implemented at all Centers Health Care companies. We respectfully request your cooperation with this policy by not offering or providing gifts or any other item or service of any value to any of our Employees or anyone else from or related to Centers Health Care, their beneficiaries or their family members.

Should you have any questions please reach out to our Contracting and/or Compliance Department.

Thank you for your anticipated cooperation,

Kenneth Rozenberg, LNHA, MPH Chief Executive Officer Centers Health Care



Memo to all Centers Health Care Employees

In our efforts to be in strict adherence of Federal and State Anti-Kickback Statutes as well as Self-Referral Laws, and to avoid even the appearance of impropriety, Centers Health Care is implementing a zero-tolerance policy for employees to solicit, accept or receive gifts (or anything of value) from vendors, contractors, business associates, beneficiaries or their family members or anyone else with whom we deal. In the event that you are offered a gift we ask that you politely decline it; if one is actually sent to you, you are expected to return it to the sender. While this policy applies all year round, it is especially important to bear in mind during the upcoming Holiday season.

If you have any questions about this policy please discuss with your Supervisor or Compliance Officer.