ALTEA MEDICAL LLC

DEPARTMENT: Compliance	**POLICY:** D-25
PAGE: 1 of 2	**REPLACES POLICY DATED:** N/A
EFFECTIVE DATE: July 15, 2026	**APPROVED BY:** Karim Salamatian

PATIENT MARKETING AND FINANCIAL ASSISTANCE

I. BACKGROUND/PURPOSE:

The purpose of this policy is to establish requirements and limitations relating to patient marketing and financial assistance. Providing items of value (such as promotional items and discounts or cost-sharing waivers) to patients or prospective patients may implicate various fraud and abuse laws. The Company and its affiliated practices are committed to compliance with all applicable federal and state laws.

II. POLICY:

A. Sales and Marketing Activities

Company personnel and personnel of its affiliated practices are prohibited from making any false or misleading statements in connection with sales, marketing, and promotional activities. We must ensure that any representations about the costs of services, the types of services, or a patient's legal or financial obligations are complete and accurate. Any statements purporting to convey information regarding the practice must be verifiable and supportable.

Any use of confidential information, including, but not limited to, protected health information, in connection with sales and marketing activities must conform with all applicable Company policies regarding the privacy and security of health information.

All marketing and promotional materials (including advertisements, scripts for outreach services, brochures, and targeted patient communications) must be approved by the Compliance Officer prior to implementation, dissemination, or other use.

B. Providing Items of Value to Patients

The Compliance Officer must review and approve all programs or promotions that provide any item or service of value to patients prior to implementation. In general, Company may only provide items or services of nominal value to patients – no more than $15 per item and $75 in the aggregate per patient per year. Certain items and activities may be subject to different standards and would not be included in this limitation. The Compliance Officer is responsible for evaluating all activities that might involve a transfer of value to a patient to assess compliance with applicable laws.

The following are examples of activities that might involve providing value to a patient and that require prior approval by the Compliance Officer. This list is only illustrative; there are many other activities that involve a transfer of value. All such activities are subject to prior approval.

- Local transportation services
- Coffee and snacks in the waiting room
- Branded items (e.g. pens, water bottles, umbrellas, magnets, towels, totes)
- Free medication delivery service
- Coupons for cosmetic or other non-covered services (e.g. cosmetic Botox®, massage services, aesthetic services)
- Free health screenings at health fairs

C. Financial Assistance Programs

Company and its affiliated practices may only provide financial assistance to patients if done in compliance with Company's Charity Care and Insurance Deductible Waiver Policy.

III. PROCEDURES:

A. Sales and Marketing

Company personnel and personnel of affiliated practices must submit all marketing and promotional materials (including advertisements, scripts for outreach services, brochures, and targeted patient communications) for review and approval by the Compliance Officer prior to implementation, dissemination, or other use.

B. Providing Items of Value to Patients

Company personnel and personnel of affiliated practices must submit all activities that involve providing anything of value to current or prospective patients for review and approval by the Compliance Officer prior to offering or providing the items or services.

C. Financial Assistance

All financial assistance provided to patients must comply with all requirements of Company's Charity Care and Insurance Deductible Waiver Policy.

IV. QUESTIONS:

Should you have any questions, comments, or concerns about this policy and associated procedures, we encourage you to raise them with your manager, the Compliance Officer, or through our Compliance Hotline (compliance@alteahc.com).