

POLICY # COMP-DKC-010

Version: 5.0

Term	Definition

POLICY

General

As outlined in the [Compliance with the Anti-Kickback Statute Policy](#), DaVita will not enter into any relationship with a Vendor or other person or entity, nor allow a Vendor access to a DaVita center, with the intent to reward or induce the purchase, lease or referral of any items or services which may be reimbursable by state or federal health care programs, including patient referrals.

Any giveaways, gifts or other items of value that a Vendor provides to DaVita teammates must comply with the [Acceptance of Gifts Policy](#) and the [Business Courtesies Policy](#).

Vendor Access to DaVita Centers

DaVita will not allow Vendors to access DaVita centers to sell or market their products or services.

The Vendor Education Guidance and Support (VEGAS) Oversight Committee, Clinical Operations, the Justice League of DaVita (JLD) and Team Quest have discretion to limit or restrict Vendor access to centers, including for Educational Training, if it is in the clinical, operational or legal best interest of patients, teammates or the Village.

Once a Vendor is approved to access a center, any representative of that Vendor is approved to provide the education. The evaluation will be made based on the value of the education or training to be provided, with consideration of clinical priorities, safety and/or proper use of product or service.

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- (a) ;
- (b) Provide Educational Trainings to teammates or patients in accordance with this policy; or
- (c) Perform other activities as approved in advance by the VEGAS Oversight Committee.

Note: Certain third-party clinicians may be granted access to the dialysis center in limited circumstances, if pre-[Summit Committee](#)-dialysis integrated care services to its patients on the treatment floor. To propose such access for non-credentialed non-teammates, cordan@1D3(ue)y2(T)-14(r)-3(ai)(h)-9(i)5(ng)4(,)-10(i)6(f581on)]a 536.m[f]-TJET-5

Generally communicated to patients in advance;

Overseen by the FA or designee; and

Held in the lobby or a conference room of the center (not on treatment floor).

- (b) Vendors participating in a Lobby Day may distribute Educational Training materials and promotional items of nominal value.
- (c) Community resources that provide services to patients at no cost, such as Meals on Wheels, are not con-3()TETB 184 236Vel