



Computer Programs and Systems, Inc. Gifts, Meals, Entertainment, and Travel Policy

(Adopted on February 4, 2019)

1. Scope of Policy.

Any gift, meal, entertainment, or travel (“GMET”) provided to or received from a third party of Computer Programs and Systems, Inc. or its subsidiaries (collectively, “CPSI”) must comply with this Gifts, Meals, Entertainment, and Travel Policy (this “GMET Policy”) outlined below. This GMET Policy applies to all CPSI employees and persons and entities acting on behalf of CPSI, wherever located in the world, and in all situations where CPSI funds or assets are used directly or indirectly to pay for third party GMET. This GMET Policy also applies whenever CPSI employees or entities acting on behalf of CPSI receive GMET from a third party in their capacity as CPSI employees or representatives.

2. Mandatory Principles.

The following rules apply whenever CPSI, a CPSI employee, or person or entity acting on behalf of CPSI gives, offers, or receives GMET:

2.1 Compliance with Applicable Law. All GMET must comply with applicable local law, CPSI’s Code of Business Conduct and Ethics, and CPSI’s Anti-Corruption Policy.

2.2 Business Purpose. All GMET must be for the purpose of promoting, demonstrating, or explaining CPSI’s products or services or products or services CPSI wishes to purchase; advancing the business interests of CPSI; or building or sustaining a business relationship between CPSI and another party.

2.3 No Improper Influence. No GMET should place the recipient under any obligation or call into question the recipient’s ability to act objectively in making business decisions relating to CPSI. No GMET should be given with the intent to *improperly influence* any act or decision of a third party in CPSI’s favor or with the intent of compromising the recipient’s objectivity in making business decisions.

2.4 Made Openly. All GMET must be given or received in an open manner.

2.5 Reasonable in Value. Subject to Section 2.9, all GMET must be reasonable in value.

2.6 Appropriate in Nature. The nature of all GMET must be appropriate to the specific business relationship and any applicable local customs, and would not embarrass CPSI or otherwise harm CPSI by its disclosure. In determining whether GMET is appropriate, one should consider the timing and frequency of the GMET. A GMET expense that might otherwise appear reasonable and appropriate might be considered inappropriate if the same person receives GMET on a regular or repeated basis, particularly over a short period of time. Adult entertainment is never appropriate.

2.7 No Cash and Cash Equivalent Gifts. The giving and receiving of cash and cash equivalent gifts, including gift and value cards, is prohibited.

2.8 No Use of Personal Funds. The use of personal funds or assets to pay for GMET for the purpose of circumventing this GMET Policy is prohibited.

2.9 Properly Approved. GMET valued at \$150 or less per person, per occasion (or \$500 or less per person per year) may be provided or received in order to achieve a business purpose without pre-approval. GMET over this threshold must be pre-approved by the giver/receiver’s direct supervisor. Pre-approval shall be documented in writing.

2.10 Accurately Reported. All GMET expenses given or received must be accurately recorded. All GMET given, regardless of amount, and any required pre-approval should be recorded using CPSI’s expense procedures. GMET received that is valued at more than \$150 per event (or \$500 per year) with its pre-approval should be recorded in an employee’s personnel file.



3. GMET and Public Officials (Foreign or Domestic).

Giving GMET or anything else of value to, or receiving GMET or anything else of value from, public officials (including employees of government-owned or government-controlled enterprises) can raise concerns about bribery or corruption. In some countries, businesses may be owned (in whole or in part) or controlled by the government, making it difficult to distinguish between non-public third parties and public officials. Individuals acting on behalf of CPSI should thoughtfully consider **all** provisions of GMET to public officials or receipt of GMET from public officials and whether such GMET is necessary to achieve a business purpose.

3.1 Additional Pre-Approval. All GMET involving a public official must be preapproved by a direct supervisor and CPSI's Compliance Point of Contact or his or her designee.

3.2 Additional Recording. Expense paperwork for all GMET involving public officials must accurately record the name of each public official involved, the name of the public entity or government-owned enterprise for which the public official works, the value of the GMET provided or received, and its purpose. This paperwork should be maintained as part of CPSI's regular expense procedures and a copy should be forwarded to CPSI's Compliance Point of Contact or his or her designee to be maintained with CPSI's anti-corruption compliance materials. This provision does not apply to nominal gifts, food, or beverages (\$25 or less) provided at large scale marketing events open to the general public or large groups of individuals.

4. GMET Outside of the Workplace.

CPSI employees who are personal friends of customers or parties with whom CPSI has a business relationship may want to exchange a gift outside the workplace for certain events (such as a wedding, birthday, or birth of a baby) or payment for a meal or other entertainment event. Such exchanges are appropriate if they are reasonable and do not create the appearance of an undue influence. Personal exchanges should never be represented as for and on behalf of CPSI, and CPSI employees shall not claim reimbursement from CPSI on the value of these personal exchanges. Personal exchanges with CPSI business partners of greater than \$200 (or \$500 per year) should be reported to a direct supervisor.

5. Policy Governance.

CPSI's Compliance Point of Contact or his or her designee may approve exceptions to this GMET Policy. Failure to abide by this GMET Policy may subject CPSI employees to disciplinary action up to and including termination of employment. Agents or consultants acting on behalf of CPSI may lose their business relationship with CPSI.