

Vendor Code of Conduct

Reach out with any questions to our 24 Hour Compliance Helpline at **508-973-5040**

Things to Know

- 1 **Respectful Behaviors and Relationships**
- 2 **Compliance with Laws**
- 3 **Privacy and Security — Confidentiality and Protection of Proprietary Information**
- 4 **Business Record Retention**
- 5 **Gifts, Meals and Compensation**
- 6 **Conflicts of Interest**
- 7 **Vendor Access to Southcoast Facilities**
- 8 **Eligibility to Participate in Federal and State Health Care Programs**
- 9 **Fraud, Waste and Abuse (FWA)**
- 10 **Publicity**
- 11 **Fundraising**
- 12 **Southcoast Health Compliance Helpline**

Southcoast Health has an obligation to its patients and its community to conduct all operations in accordance with applicable law and in support of Southcoast Health's charitable mission. To this end, Southcoast Health personnel at all times must uphold ethical standards, and promote fair and open dealings free from conflicts of interest.

As a Southcoast Health Vendor, you help us achieve these goals in a manner that maximizes the ability of Southcoast Health to carry out its charitable mission. The Vendor Code of Conduct applies to all individuals and entities who have a business relationship with Southcoast or conduct any business on its behalf or under its name or brand (other than wholly-owned subsidiaries of Southcoast).

This Vendor Code of Conduct sets forth the minimum standards by which all Southcoast Health vendors are expected to conduct themselves in connection with the provision of goods or services to our system. You are responsible for complying with, and sharing this Vendor Code of Conduct with all your organization's personnel who may be engaged in business activities with Southcoast Health.

The Compliance Helpline is available 24 hours a day, 365 days a year at 508-973-5040.

Suppliers may also file reports on-line [HERE](#).



Vendor Code of Conduct

Reach out with any questions to our 24 Hour Compliance Helpline at **508-973-5040**

1 Respectful Behaviors and Relationships

This Vendor Code of Conduct reflects Southcoast Health's expectations and conduct standards for all vendors. All vendors must act with honesty, dignity and respect when providing services for or at Southcoast Health. This includes maintaining a positive and courteous customer service orientation, speaking professionally, treating others with respect, not engaging in any discriminatory or harassment practices, and responding to requests for information or assistance in a timely manner.

No single document can address every issue that may arise in the course of business; therefore, should you have questions or need additional information, please consult one of the resources listed in the **Compliance Helpline** section of this document.

2 Compliance with Laws

Vendors are required to conduct their business activities in compliance with all applicable laws and regulations, including laws applicable to individuals and entities directly or indirectly receiving Medicare, Medicaid and other federal funds or otherwise participating in federal or state health care programs, including but not limited to the Anti-Kickback Statute, Civil Monetary Penalties Law, Eliminating Kickbacks in Recovery Act, the Physician Self-Referral Law (Stark Law), and the False Claims Act, and applicable state laws.

3 Privacy and Security — Confidentiality and Protection of Proprietary Information

Southcoast Health vendors must protect confidential and proprietary information and trade secrets, including business plans, strategies, staffing, locations, schedules, partnerships, vendor negotiations, that they obtain, develop, or have access to as a result of their relationship with Southcoast Health. Vendors must meet high legal, ethical and professional standards, and may not access, share, or otherwise misappropriate confidential business, health, or personal information of Southcoast Health. Vendors are also obligated to extend the expectations and standards to all subcontractors to respect patient privacy and confidentiality, and maintain adequate security safeguards to prevent cybersecurity interruptions.

Southcoast Health is subject to federal and state laws governing patient confidentiality, privacy, and the maintenance, use, and disclosure of medical records, including the Health Insurance Portability and Accountability Act ("HIPAA"), regulations governing substance use disorder treatment records, and state laws providing heightened protections for certain records. Southcoast Health maintains a secure electronic health record system to store and access records as authorized. Federal and state laws require Southcoast Health and its vendors to protect the privacy and security of protected health information ("PHI"). Vendors are responsible for ensuring their personnel are trained on HIPAA Privacy and Security

Vendor Code of Conduct

Reach out with any questions to our 24 Hour Compliance Helpline at **508-973-5040**

Rules and any applicable state laws, receive at least annual role-appropriate cybersecurity training, and take reasonable industry-standard measures to protect network-connected devices from cyber threats. Vendors requiring access to PHI to provide services to Southcoast Health must execute a Business Associate Agreement, and may be required to execute a Confidentiality Agreement and/or End-User License Agreement. Southcoast Health must also maintain accurate business records in accordance with legal and industry standards, safeguard and retain records as required by law, and ensure records are securely destroyed in compliance with retention requirements.

4 Business Record Retention

Southcoast Health requires vendors to retain and make available to Southcoast Health records related to business with Southcoast Health in accordance with applicable law, regulation, and contract requirements.

5 Gifts, Meals and Compensation

Southcoast Health does not permit employees to accept gifts from vendors. Gifts from vendors may be seen as an attempt to influence or affect the decisions or actions of Southcoast Health. Accordingly, Southcoast Health employees may not accept cash, gift cards, hospitality, stock, event tickets or anything financially valuable from vendors. Vendors may choose to direct donations and gifts on behalf of Southcoast Health to the Southcoast Mission Advancement Department.

Vendors are prohibited from offering or providing Southcoast Health employees:

- + Cash in any form
- + Cash equivalents such as gift certificates
- + Property (including apparel or personal accessories)
- + Use of something of value
- + Discounted items or services (unless offered to SHS and accepted in the normal course of business and properly documented in a written agreement, and disclosed and reported under applicable law).
- + Hospitality
- + Travel and travel expenses
- + Payment or forgiveness of another's obligations
- + Food, beverages, or meals
- + Items associated with recreation or entertainment such as tickets or admission to theater or sporting events, concerts, sporting equipment, leisure or vacation trips; and/or
- + Promotional materials such as Vendor-branded office supplies and personal items, such as pens, coffee mugs, calendars and note pads, unless they are of minimal value

There is no de minimis exception to this prohibition on vendors offering or giving gifts to Southcoast Health or its personnel.

Vendor Code of Conduct

Reach out with any questions to our 24 Hour Compliance Helpline at **508-973-5040**

6 Conflicts of Interest

All potential conflicts of interest involving a vendor must be appropriately disclosed. Conflicts of interest include situations where a Southcoast Health board member, medical staff member, employee, or other representative has a relationship (e.g., employment, investment, consulting services or other connection) with a vendor that conflicts, or could appear to conflict, with Southcoast Health's business interests. Southcoast Health does not permit people with conflicts of interest to make or influence purchasing decisions. In addition, Southcoast Health requires employees to disclose any employment, financial interest or relationship with a vendor to their direct leader or through the Southcoast Health conflicts of interest disclosure process. As a vendor to Southcoast Health, you are obligated to bring any actual, potential, or perceived conflicts of interest to the attention of Southcoast Health.

7 Vendor Access to Southcoast Facilities

When visiting Southcoast Health facilities, vendors must comply with applicable Southcoast Health visitor policy, including but not limited to, infection control and confidentiality policies. Vendor representatives are required to schedule appointments and must register and satisfy outstanding requirements through our vendor management system prior to visiting any Southcoast Health facility. Representatives will be required to state the area to be visited, and visits must be restricted to those location(s) only. Properly issued guest badges provided by Southcoast Health must be worn at all times.

8 Eligibility to Participate in Federal and State Health Care Programs

Southcoast Health does not do business with individuals and organizations that are excluded, suspended, or otherwise not allowed to participate in government health programs such as Medicare and Medicaid or whose officers, directors or employees are excluded, suspended or otherwise not allowed to participate in such programs. Southcoast Health regularly checks government-issued lists of excluded individuals. We include terms in vendor contracts that address exclusion. Vendors are responsible for taking all necessary steps to ensure vendor and subcontractor personnel providing goods and services to Southcoast Health, directly or indirectly, are eligible to participate in federal and state health care programs.

9 Fraud, Waste and Abuse (FWA)

Southcoast Health will promptly investigate any reports of alleged violations of law, regulations, or Southcoast Health policies involving vendors, including allegations of FWA involving federal or state health care programs. Vendors are expected to fully cooperate in such investigations and, where appropriate, take corrective actions in response to confirmed violations. The Federal False Claims Act and similar state laws make it a crime to knowingly present a false claim to the government for payment. These laws also protect "whistleblowers" – people who report noncompliance or fraud, or who assist in investigations – from retaliation. Southcoast Health policy prohibits retaliation of any kind against individuals exercising their rights under the Federal False Claims Act or similar state laws.

Vendor Code of Conduct

Reach out with any questions to our 24 Hour Compliance Helpline at **508-973-5040**

10 Publicity

Vendors are not permitted to distribute advertising, press releases, or any other general public announcement regarding its products or services to Southcoast Health facilities unless you have obtained prior written authorization from an authorized Southcoast Health management employee. In no event may vendors utilize marketing or advertising that expressly or implicitly suggests any endorsement by Southcoast Health of a vendor's product.

11 Fundraising

As a tax-exempt, charitable organization, Southcoast Health may solicit charitable contributions to support our health care delivery mission. Only Southcoast Health foundations or specific departments responsible for fundraising activities may solicit such gifts. Southcoast Health colleagues with responsibilities for ongoing business relationships with suppliers, including the negotiation or selection of suppliers, are prohibited from solicitation and fund-raising activities with suppliers.

12 Southcoast Health Compliance Helpline

Suppliers are expected to use the Compliance Helpline to report any actual or suspected violations of this Vendor Code of Conduct including FWA matters, safety concerns, or other matters on an anonymous basis without fear of retaliation.



The Compliance Helpline is available 24 hours a day, 365 days a year at 508-973-5040.

Suppliers may also file reports on-line [HERE](#).