

# Vendor/Contractor Responsibility for Compliance with Code of Ethics

## PURPOSE:

The purpose of this policy is to guide the business behavior of Shepherd Center's vendors and contractors in an effort to ensure their ethical conduct.

## POLICY:

In contracting with or selling goods and/or services to Shepherd Center, the vendor/contractor and their respective agents agree to act in compliance with all applicable laws, regulations and Shepherd Center's Code of Ethical Conduct. Further, in contracting with or selling goods and/or services to Shepherd Center's inpatients and outpatients (and their respective families), the vendor/contractor and their respective agents are expected to comply with all applicable laws, regulations and Shepherd Center's Code of Ethical Conduct.

## PRIMARY OBJECTIVES:

1. The following general control procedure applies to commercial business representatives who visit Shepherd Center during normal business hours

### **Shepherd Center/Employee Related**

Prior to entering Shepherd Center premises, all vendor/contractor representatives must have a scheduled appointment with an employee of Shepherd Center. All such representatives are required to check in with the security officer at the Security Desk on the first floor of the Marcus Building, log into Reprax and receive an identification sticker prior to proceeding to their scheduled appointment.

Construction contractors are required to report to Plant Maintenance to receive an identification badge.

In the event of emergency circumstances that require a visit to Shepherd Center after normal business hours by vendor/contractor representatives, the representative must check in with the security guard at the Security Desk on the first floor of the Marcus Building, log into Reprax, receive an identification sticker and provide a reason for the emergency visit.

### **Patient/Family Related**

Any vendor/contractor representative who desires to meet with a Shepherd Center patient or their family must schedule an appointment through the applicable Program (e.g., SCI, ABI, MS, etc.) scheduler.

When arriving at Shepherd Center for an appointment with a patient or their family, the representative is required to check in with the security guard at the Security Desk on the first floor of the Marcus Building, log into Reprax and receive an identification sticker.

Any representative invited to events such as seminars, equipment demonstrations, shows, etc. is allowed to give out information about their products and their company but is not allowed to ask

for any personal information from patients and their family, such as their name, address, phone number, e-mail address, etc.

2. The following will be expected of all vendors/contractors and their respective representatives who conduct business with Shepherd Center:
  - a. Familiarity with Shepherd Center's Code of Ethical Conduct.
  - b. It is mandatory for any vendor/contractor to report any actual, suspected or possible violation of fraud and abuse laws to Shepherd Center's Chief Compliance Officer.
3. Failure to follow the standards of the Code of Ethical Conduct will result in action by Shepherd Center up to and including termination of Shepherd Center's business relationship with the vendor/contractor.
4. All vendors/contractor representatives are expected to comply with any and all infection control measures that are currently in effect at Shepherd Center and that are deemed applicable to the vendor/contractor representative during their visit to Shepherd Center (e.g., masks, gloves, goggles, etc.).