

Vendor/Contractor Responsibility for Ethics in Business Program  
POLICY: AC.ETH.01.08

Date: July 1999

Responsible to: President & CEO

**PURPOSE:**

The effectiveness of this policy depends upon the willingness and complete participation of individuals, who while not employees are nonetheless vendors/contractors who could impact the program.

**POLICY:**

In contracting with or selling services/goods to Shepherd Center and Affiliates the contracting agent agrees to act in total compliance with all laws and regulations and all agents are expected to comply with Shepherd's *Ethics in Business Program*.

In contracting with or selling services/equipment to Shepherd Center inpatients and their families, the agents are expected to comply with Shepherd's *Ethics in Business Program*.

**PROCEDURE:**

The following primary objectives are to be established and carried out through the ethics in business program.

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

**Employee Related**

Any salesperson not having a direct appointment with an employee of the Center must report to Security for identification badge and give reason for visit.

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

Emergency circumstances, which require visits to the Center after normal business hours by vendor/contractors, will require the individuals to check in with the security guard at the front entrance desk and sign in.

## **Patient/Family Related**

Any salesperson that desires to meet with a Shepherd Center inpatient or their family must schedule an appointment through the SCI scheduler at 404.350.7723.

When arriving at the Center for an appointment with an inpatient or their family, the salesperson is required to check in with the security guard at the Security Desk on the first floor of the Marcus Building and receive an identification badge.

Any salesperson 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, etc.

2. The following responsibilities will be expected of all contractors/vendors who do business with Shepherd Center or Affiliates.

All vendors/contractors are expected to be aware of procedures, which would affect them in any business dealings with the Center or Affiliates.

It is mandatory for any vendor/contractor to report actual or possible violation of fraud and abuse laws to the Chief Compliance Officer.

3. Failure to follow the standards of the ethics in business program will result in action by the Center, up to and including termination of the business relationship.

Approved: