



BUSINESS INTEGRITY SERVICES



A Quick Reference Guide to the Code of Conduct for Vendors

Henry Ford Health System (HFHS) is committed to complying with all laws and regulations that apply to our organization and operating in a manner consistent with the highest professional and ethical standards. As a vendor for Henry Ford Health System, you play a critical role in helping us achieve these goals. We have created the Vendor Code of Conduct to communicate the minimum standards by which all Henry Ford Health System Vendors are expected to conduct themselves when providing goods or services to our system. Please note that Henry Ford Health System or departments may establish guidelines that are more restrictive than those described in this document. It is your responsibility to share this Vendor Code of Conduct Reference Guide with all your staff who may be engaged in conducting business activities with Henry Ford Health System, including all affiliates.

Conflicts of Interest: Conflicts of interest, in which a Henry Ford Health System (HFHS) colleague's relationship with a Vendor conflicts or could appear to conflict with Henry Ford Health System interests, must be avoided. We recognize there are circumstances in which a member of a Henry Ford Health System colleague's family or household may work for a Vendor. Henry Ford Health System requires our colleagues to disclose such relationships in a timely manner. We also expect our Vendors to bring any actual, potential or perceived conflicts of interest to the attention of a Henry Ford Health System Chief Compliance Officer or other appropriate channels within the organization. Henry Ford Health System staff are not permitted to work for a Vendor if Henry Ford Health System is a customer of the Vendor. Below are some examples of conflict of interest.

Gifts, Entertainment, and Meals: Henry Ford Health System (HFHS) recognizes that the cost of gifts, entertainment and meals provided by Vendors is ultimately carried in the cost of products and services we purchase. Consistent with our mission to be faithful stewards of our resources, Henry Ford Health System discourages Vendors from providing any gifts, entertainment, meals or other items of value to our associates, physicians or contractors working at Henry Ford Health System facilities. Guidelines are as follows:

Gifts: Vendors are not allowed to provide anything of value to employees if it could in any way appear to influence decision making on behalf of HFHS. When onsite, our policy prohibits employees from accepting any form of gifts. Off-site, on occasion, gifts of a nominal value (\$100 or less), may be given if the acceptance will not influence decisions made on behalf of HFHS.

Entertainment: Henry Ford Health System (HFHS) staff may accept an invitation from Vendors to attend a social or entertainment event in order to further develop appropriate business relationships subject to the following: (1) the Vendor accompany the employee/s to the event; (2) the cost associated with such an event is reasonable and appropriate, which, as a general rule, means the cost will not exceed \$100 per person; (3) no expense is incurred for any travel costs (other than in a vehicle owned privately or by the host company) or overnight lodging; (4) such events are



infrequent, which generally means no more than once per year; and (5) the HFHS employee receives the approval of their supervisor.

Meals: Henry Ford Health System (HFHS) staff may accept an offsite meal paid by Vendors to further develop appropriate business relationships subject to the following: (1) the costs associated with such meals is modest, and (2) such meals are infrequent, which generally means no more than once per year.

The following items are *never* acceptable:

- ✦ Gifts or entertainment that reasonably could be perceived as a bribe, payoff, deal, or any other attempt to gain a competitive advantage
- ✦ Cash or items redeemable for cash such as checks, gift cards, stocks, etc.
- ✦ Gifts from government representatives
- ✦ Gifts or entertainment that may violate a law or regulation

Fundraising: As a tax-exempt, charitable organization, Henry Ford Health System (HFHS) may solicit charitable contributions to support our health system. HFHS policy restricts the solicitation of gifts from Vendors to foundations or specific departments responsible for fundraising activities. HFHS staff with responsibilities for ongoing business relationships with Vendors, including the negotiation or selection of Vendors, are prohibited from solicitation and fund-raising activities.

Compliance with Laws: Vendors are required to conduct their business activities in compliance with all applicable laws and regulations, including laws that are applicable to individuals and entities receiving Medicare, Medicaid and other federal funds.

Privacy and Security: Federal and state laws require Henry Ford Health System (HFHS) and our Vendors to maintain the privacy and security of Henry Ford Health System patient health information (“PHI”). Vendors are responsible for ensuring that all Vendor staff who provide services to Henry Ford Health System are aware of and familiar with the requirements of both the Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Rules and, where applicable, those state laws that provide more stringent protection of PHI. If your business relationship with Henry Ford Health System will require access to or usage of PHI, you will be required to sign a business associate agreement with us.

Infection Control Policies: Vendor representatives whose activities require access to direct patient care environments are required to adhere to Henry Ford Health System (HFHS) infection control policies applicable to the facilities visited. To ensure the safest environment for our patients and control the rate of infections, proper hand hygiene is required by all HFHS OR staff and vendors with access to patient care procedural areas.

Eligibility to Participate in Federal and State Health Care Programs: Henry Ford Health System (HFHS) will not conduct business with any Vendor excluded, debarred, or ineligible to participate in federal or state health care programs such as Medicare and Medicaid, or whose officers, directors or staff are excluded from participating in federal or state health care programs. Vendors are responsible for taking all necessary steps to ensure staff involved in providing goods and services to Henry Ford Health System, directly or indirectly, remain eligible to participate in federal and state health care programs.

Respectful Work Environment: Henry Ford Health System (HFHS) is committed to creating and maintaining a respectful work environment for all staff, caregivers, physicians, vendors and visitors. As a vendor for Henry Ford Health System you should expect to be treated with respect. We also expect that you will treat everyone you encounter in our facilities with equal respect and fairness. Staff, physicians and others who work for Henry Ford Health System are not expected to tolerate disrespectful behavior in the workplace, including behavior that is rude, embarrassing, belittling, berating, threatening, intimidating,



and/or insulting, or the use of loud, profane and abusive language in either public or private places. You are encouraged to report such behavior to the Chief Compliance Officer.

Fraud, Waste and Abuse (FWA) and Stark: Henry Ford Health System (HFHS) will promptly investigate any reports of alleged violations of law, regulations or HFHS policies involving a Vendor or a Vendor's staff and agents, including allegations of FWA involving federal or state health care programs. Vendors are expected to fully cooperate in such investigations and, where appropriate, in taking corrective actions in response to confirmed violations, as well as reporting any violations to HFHS. The Federal False Claims Act and similar state laws make it a crime to 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. HFHS policy prohibits retaliation of any kind against individuals exercising their rights under the Federal False Claims Act or similar state laws.

Deficit Reduction Act of 2005 (DRA) Requirements: The DRA requires Henry Ford Health System (HFHS) to provide detailed information to its staff, contractors and agents regarding the Federal False Claims Act and applicable state false claims laws. Vendors are responsible for reviewing the False Claims Act information section of the HFHS Code of Conduct at: <https://www.henryford.com/-/media/files/henry-ford/hcp/physician-careers/current-code-of-conduct-8-11-17.pdf> and for sharing this information with your staff conducting business with Henry Ford Health System.

Environmental Purchasing Policy: In support of our mission to improve the health of the communities we serve, Henry Ford Health System (HFHS) is committed to purchasing products and services whose environmental impacts are healthier for the environment and human health. Henry Ford Health System expects Vendors to develop price competitive, environmentally sound, and safe products and services that help us achieve these objectives.

Supplier Diversity Program: Henry Ford Health System (HFHS) has a long tradition of support for programs that foster diversity in our organization, and in our communities. Where applicable, Henry Ford Health System expects its Vendors to mirror our commitment, through subcontracting opportunities with diverse businesses and providing information to Henry Ford Health System on supplier diversity when requested.

Visitation Policy: When visiting Henry Ford Health System facilities, Vendors must comply with applicable Henry Ford Health System (HFHS) supplier visitation policy, which is available at facilities upon request. Vendor representatives are required to schedule appointments and must register prior to visiting any Henry Ford Health System medical facility. Representatives will be required to state the area to be visited, and visits must be restricted to those location(s) only. Visitor badges provided by the facility must always be worn.

Product Samples: Sample medications must be approved by the HFHS Pharmacy and Therapeutics Committee before being distributed to a physician office or clinic. Vendor product samples may not be provided without the advance review and approval of HFHS Supply Chain Management.

Publicity: Vendors are not permitted to distribute advertising, press releases, or any other public announcement regarding its products or services to Henry Ford Health System (HFHS) facilities unless you have obtained prior written authorization from an authorized Henry Ford Health System management staff.

Record Retention: Henry Ford Health System (HFHS) requires Vendors to retain and make available records related to business with Henry Ford Health System in accordance with applicable law, regulation, and contract requirements.

Thank you!



We appreciate your taking time to review this information and your commitment to supporting Business Integrity at Henry Ford. You can obtain more information about the Code of Conduct and Compliance on henryford.com (search Compliance). If you have questions about this information, please feel free to contact one of the individuals listed below.

Where to Find Help

Debora Murray Chief Compliance Officer – North Market including Henry Ford Macomb and West Bloomfield Hospitals and all affiliated ambulatory sites.

dmurray3@hfhs.org

Matt Wolocko Chief Compliance Officer – Henry Ford Detroit and Wyandotte Hospitals, all affiliated ambulatory sites and corporate offices.

Mwolock1@hfhs.org

MaryJo White Chief Compliance Officer – Henry Ford Allegiance Hospital, all affiliated ambulatory sites, and Community Care Services

mwhite9@hfhs.org

***Glenn Croxton Director Supplier Relationship Management – Supply Chain Management
Henry Ford Health System (313) 876-9968***

gcroxto1@hfhs.org

You may report any real or potential compliance issues to the HFHS Compliance Line at 1-888 HFH-3044. This Line is toll-free and staffed 24 hours a day, seven days a week by an outside organization on behalf of HFHS. Calls are not traced or recorded. You can also choose to send an email through the same system to: MyComplianceReport.com (access ID=HFH)

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24 Hour Business Integrity Line: 1-888-HFH-3044