



# Vendor Code of Conduct

## CODE OF CONDUCT

UnityPoint Health is committed to operating with the highest professional and ethical standards and we expect the same of our Vendors. UnityPoint Health has created this Vendor Code of Conduct to communicate the standards by which all UnityPoint Health Vendors are expected to conduct themselves when providing goods or services to our organization. Some departments within UnityPoint Health may adopt guidelines more restrictive than described in this document, in which case, the stricter guidelines apply.

## CONFLICTS OF INTEREST

Vendors and UnityPoint Health employees must disclose any actual, apparent or perceived conflict of interest. Specifically, any family, personal or financial relationships that exist between the Vendor (or Vendor representative) and UnityPoint Health or its

employees must be disclosed. Vendors are also expected to avoid actions that may result in a conflict of interest. This could include offering gifts, travel expenses, excessive meals or entertainment, or any other item of value to a UnityPoint Health employee. Vendors may not employ UnityPoint Health employees without UnityPoint Health's prior approval.

## UNITYPOINT COMPLIANCE HELPLINE:

1 (800) 548-8778

## VENDOR POLICY

Vendors must comply with all guidelines in the Vendor Policy #2.AD.04 when conducting business at any facility of UnityPoint Health.

## **COMPLIANCE WITH LAWS AND POLICIES**

UnityPoint Health requires its Vendors to conduct their business in accordance with any applicable laws, rules, regulations and standards. It is also the responsibility of the Vendor to comply with UnityPoint Health policies and procedures. Depending on the services being performed, these laws may include, but are not limited to, the Patient Protection and Affordable Care Act, the Health Insurance Portability and Accountability Act (HIPAA), the HIPAA Privacy Rules, HIPAA Security Rules, Medicare and Medicaid program requirements.

## **GIFTS AND GRATUITIES**

UnityPoint Health permits employees to accept non-personal gifts of nominal value. Gifts that violate applicable laws or are, or appear to be, intended to encourage the referral of patients or federal health care business are strictly prohibited. Acceptance of meals are acceptable if modest and infrequent. Gifts of cash or cash equivalents are never allowed. If a Vendor would like to contribute to UnityPoint Health, it should

contact the UnityPoint Health Foundation. UnityPoint Health employees or Vendors with questions on the acceptance of gifts should contact UnityPoint Health's Compliance Department.

## **INELIGIBLE VENDORS**

UnityPoint Health will not conduct business with any vendor excluded, debarred or otherwise ineligible to participate in state or federal health care programs, or whose officers or employees are excluded. Vendors are responsible for ensuring its employees and sub-contractor employees are not excluded from participation in any state or federal health care program. Vendors should also conduct a reasonable and prudent background investigation and screening before hiring employees who have access to patients or who have discretionary authority to make decisions that may involve compliance with the law. Vendors must notify UnityPoint Health immediately if any officer of the Vendor or the Vendor itself, or any employee of the Vendor is excluded from participation in any state or federal health care program.