



## Vendor Code of Conduct

Carson Valley Medical Center strives to demonstrate high ethical standards in our business practices. Our Vendors play an integral role in making this happen. We have created the Vendor Code of Conduct to communicate to our Vendor community the minimum standards by which all Vendors are expected to conduct themselves when providing goods and services to Carson Valley Medical Center. Vendor(s) include any contractors, manufacturers, suppliers, distributors, wholesalers, service companies, and other businesses that contract with, or seek to contract with Carson Valley Medical Center to provide products and/or services to Carson Valley Medical Center and/or Carson Valley Medical Center members or patients.

**Gifts and Business Courtesies** – Carson Valley Medical Center discourages you from providing gifts, meals, entertainment or other business courtesies to Carson Valley Medical Center physicians, employees and contractors working in Carson Valley Medical Center facilities, if they could be perceived as a bribe, payoff, deal, or any other attempt to gain advantage.

**Conflicts of Interest** – Conflicts of interest between a Vendor and Carson Valley Medical Center personnel, or the appearance thereof, should be avoided. We recognize that there are circumstances where members of the same family or household may work for Carson Valley Medical Center and a Vendor. However, if this creates an actual or potential conflict of interest, the conflict must be disclosed by the Vendor. The disclosure must be made at the earliest opportunity, in writing, to a person in authority at Carson Valley Medical Center, other than the person who has the relationship with the Vendor.

**Compliance with Laws** – Vendors are expected to conduct their business activities in full compliance with applicable laws and regulations, including laws that are applicable to individuals and entities receiving federal funds.

**Publicity** – Advertising, press releases, or any other general public announcement by a Vendor, stating the availability of its products or services at Carson Valley Medical Center is strictly prohibited unless the Vendor has obtained prior written authorization from the Carson Valley Medical Center Marketing and Public Relations Director.

**Fraud, Waste and Abuse** – Carson Valley Medical Center will investigate allegations of Vendor fraud, waste or abuse and, where appropriate, will take corrective action, including but not limited to civil or criminal action.

**Ineligible Vendors** – Carson Valley Medical Center will not do business with any Vendor if it or any of its officers, directors or employees is, or becomes, excluded by, debarred from, or ineligible to participate in any federal health care program, or is convicted of a criminal offense in relation to the provision of health care. Carson Valley Medical Center expects each Vendor to (a) disclose whether any of its officers, directors or employees becomes sanctioned by, excluded from, debarred from, or ineligible to participate in any federal program or is convicted of a criminal offense related to the provision of health care and (b) assume full responsibility for taking all necessary steps to assure that Vendor employees directly or indirectly involved in providing goods and services to Carson Valley Medical Center have not or are not currently excluded from participation in any federal program.



**Visitation Policy** – When visiting Carson Valley Medical Center facilities, Vendors shall comply with the applicable visitation policy, which shall be made available at facilities upon the request of a Vendor representative. Vendor representatives are encouraged to schedule appointments and must register with **Materials Management** prior to visiting any area of our medical facilities. The registration includes the area to be visited, and visits are restricted to the location(s) noted in the registration. Visitor badges provided by the facility must be worn at all times.

**Respect-** Vendors are expected to show proper respect and consideration for each other, regardless of position or station. Discriminatory treatment, harassment, abuse, intimidation will not be tolerated.

**Privacy and Security** – Federal and state laws require Carson Valley Medical Center and our Vendors to provide for the privacy and security of member and patient information. Vendors are responsible for assuring that all Vendor employees who provide any services to Carson Valley Medical Center are knowledgeable about the requirements of both the Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Rules and, where applicable, those state laws and Carson Valley Medical Center policies that provide for more stringent protection of protected health information (PHI). If PHI for Carson Valley Medical Center's members/patients will be disclosed to you or if you will have access to such information, we may be required to enter into a business associate agreement with you.

**Carson Valley Medical Center Compliance Hotline** – Vendors are requested to report any suspected wrongdoing or compliance violations. The Carson Valley Medical Center Hotline is a convenient and anonymous way to report suspected wrongdoing without fear of retaliation. Our toll free Compliance Hotline number is - **1-800-611-5097**. Complaints are investigated by qualified compliance consultants and investigators. Appropriate action is taken against employees and Vendors found to have broken the law or violated internal policies.