

# Health Quest Systems, Inc.

## Vendor Code of Conduct

Health Quest Systems, Inc. (“HQ”) and its affiliates strive to comply with all applicable laws, regulations, and HQ policies and to demonstrate high ethical standards in our business practices. Our Vendors play an integral role in helping to reach these goals. We have created this Vendor Code of Conduct to communicate the minimum standards by which all Vendors are expected to conduct themselves when providing goods and services to HQ. Please share this Vendor Code of Conduct with your employees.

### Our Commitment

The HQ Vendor Code of Conduct articulates our commitment to our values and ethical business behavior while reminding Vendors of their overriding responsibility to use sound judgment and demonstrate personal integrity and professionalism. The Vendor Code of Conduct has been adopted by the HQ Executive Compliance Committee.

### Compliance with Laws

Vendors are expected to conduct their business activities in compliance with applicable laws and regulations, including laws that are applicable to individuals and entities receiving federal funds. Vendors are also expected to take appropriate action against their employees and contractors who have been found to have violated the law or the Vendor’s policies.

**We are committed to:**


## **Upholding the Laws and Policies that Govern our Work**

**Giving or Receiving Gifts** – HQ prohibits Vendors from providing gifts, meals, entertainment, or other business courtesies to HQ Personnel.

**Objective Decision Making/Conflicts of Interest** – Conflicts of interest between a Vendor and HQ Associate, or the appearance therefore, should be avoided. When an actual, potential, or perceived conflict of interest occurs, that conflict must be disclosed, in writing, by the Vendor to a person of authority at HQ other than the person who has the relationship with the Vendor.

**Ineligible Vendors** – HQ 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. HQ expects each Vendor to assume full responsibility for taking all necessary steps to assure that its employees involved in providing goods and services to HQ, directly or indirectly, have not been or are not currently excluded from participation in any federal program.

**Preventing Fraud, Waste and Abuse** – HQ makes every effort to prevent, detect, and correct fraud, waste and abuse. All allegations of Vendor fraud, waste and abuse will be investigated and, where appropriate, will result in corrective action, including but not limited to civil or criminal action. 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. HQ policy prohibits retaliation of any kind against individuals exercising their rights under the Federal False Claims act or similar state laws.




**Privacy and Security** – Vendors are expected to treat confidential information obtained through their service to HQ with the utmost confidentiality. Information learned about a patient’s medical treatment or condition is considered confidential as a matter of law and should be treated with particular care. Various state and federal laws and regulations further protect certain types of information about a patient, notably the Privacy and Security Rules under the Health Insurance Portability and Accountability Act (HIPAA). It is essential, therefore, that individuals adhere to all applicable laws regarding the confidential and privileged status of medical records and communications. Vendors are responsible for assuring that all Vendor employees and contractors who provide products and/or services to HQ know about and comply with these privacy and security requirements. Vendors are required to report privacy and security incidents to the HQ Corporate Compliance Office.

**Keeping Accurate and Complete Records** – HQ requires Vendors to retain and make available records related to business with HQ in accordance with applicable law, regulation and contract requirements.

**Non-Discrimination** – HQ does not discriminate on the basis of sex, age, race, color, religion, national origin, sexual orientation, gender identity, disability, or veteran status. HQ strives to follow federal and state non-discrimination laws and regulations and requires Vendors to follow non-discrimination regulations applicable to them.

**Visitation Policy** – When visiting HQ facilities, Vendors must comply with the applicable visitation policies. Vendor representatives are required to schedule appointments and must register prior to visiting any HQ medical facility. Visitor badges provided by the facility must be worn at all times.




**Publicity** – Vendors are not permitted to distribute advertising, press releases, or any other general public announcement regarding its products or services in HQ facilities unless you have obtained prior written authorization from an authorized HQ management associate. A Vendor is not permitted to use the names, trade names, service marks, trade dress or logos of HQ in any advertising, publicity, on the internet or otherwise without first obtaining HQ’s consent.

### HQ Corporate Compliance Program

In order to assist in complying with laws and regulations, HQ and its affiliates have adopted corporate compliance policies and programs. Every affected individual is expected to cooperate fully in the implementation of such policies or programs as requested and to comply fully with them. Our Corporate Compliance Program is designed to enhance our understanding of acceptable behavior and appropriate decision-making. Corporate Compliance policies exist, and are available upon request, that provide detail on various compliance responsibilities and activities. These policies reflect the expectations found in this Vendor Code of Conduct. Included in these policies are disciplinary policies that outline the consequences of non-compliance. Conduct contrary to these expectations will be considered a violation of the compliance program and related policies and procedures. It is our expectation that business is conducted in a manner that supports integrity in operations.

### What should you do if you suspect a violation of our policies, values and commitment?

***It is everyone’s duty to promptly report any activity that appears to violate the Vendor Code of Conduct or any laws, regulations or organizational policies.***



Vendors are expected to report any suspected wrongdoing. The HQ Compliance Hotline is a convenient and anonymous way for Vendors to report suspected wrongdoing, including fraud, waste, and abuse, and compliance violations, without fear of retaliation. It is available 24 hours a day, 365 days a year. Our toll free Compliance Hotline number is 1-844-Yes-WeComply (1-844-937-9326). Vendors can also contact the HQ Corporate Compliance Office directly. Appropriate action is taken against those found to have violated applicable law or HQ policy.

**Health Quest Systems Inc.**  
**Vendor Code of Conduct Acknowledgement Form**

I acknowledge that:

- I have received the Health Quest Vendor Code of Conduct and understand that is my responsibility to read and comply with the legal and ethical practices contained in the Vendor Code of Conduct.
- I have responsibility to report potential compliance issues to the Corporate Compliance Office, Health Quest Compliance Office, or the Compliance Hotline.
- I am aware that violations of the Vendor Code of Conduct and Health Quest's policies and procedures may result in action that deals with my behavior.

Vendor Name \_\_\_\_\_

Vendor Representative Name \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

Title or Position \_\_\_\_\_

**Health Quest Systems Inc.**  
**Vendor Code of Conduct Acknowledgement Form**

I acknowledge that:

- I/We have received the Health Quest Vendor Code of Conduct. Attached is a copy of my/our company's code of conduct/ethics which we are abiding by, which contains substantially similar ethical principles.

Vendor Name \_\_\_\_\_

Vendor Representative Name \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

Title or Position \_\_\_\_\_