

<p style="text-align: center;"><b>Ministry Health Care</b> <b>Statement of Business Principles for Suppliers</b> <b>and</b> <b>Supplier Code of Conduct</b></p>
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**Introduction**

This document reaffirms the general Business Principles for Suppliers and standards of conduct that govern how Ministry Health Care and all Ministry entities conduct their affairs with Suppliers.

Ministry expects its Suppliers to be aware of and observe these Business Principles for Suppliers and Ministry's Supplier Code of Conduct. This conduct begins with the basic requirement that all on-site, service suppliers be respectful of our 'sign in' policy, commonly known as Reprax. This is important so all persons' whereabouts are known to our facility staff in the event of an emergency.

Ministry lives its Promise each day of Keeping Patients First in all that we do and is keenly focused on serving the poor and under-privileged, as this is our Mission, as brought by our Founding Sisters. Upholding our Promise and our Mission is a fundamental element of our reputation and this is paramount. We are judged by how we act. Our reputation will be upheld if we act with honesty and integrity in all our dealings and if we live the 'golden rule'. We treat others as we wish to be treated. As a Supplier to Ministry, interacting with our employees and our community, you play a key role in our ability to live our Promise and serve our Mission.

Ministry Core Values of 'Service' and 'Justice' are particularly important as they are among the ways we fulfill our foundation of honesty, integrity and respect for people. Ministry firmly believes in the fundamental importance of promoting an environment that fosters trust, openness, teamwork, professionalism and taking pride in what we do.

Our Core Values (see [www.ministryhealth.org](http://www.ministryhealth.org), 'About Us') are the foundation upon which these Business Principles for Suppliers were developed. These Principles apply to all transactions, large or small, and describe the behavior expected of our employees and every Supplier conducting business with Ministry.

In turn, the application of these Principles is underpinned by Ministry's commitment to ensuring that its employees and Suppliers understand the Principles and act in accordance with them. We recognize that it is vital that our behavior matches our intentions.

Ministry recognizes that maintaining the trust and confidence of our patients, employees, government (who pays us for providing health care services), local community, Board of Directors, stakeholders, Suppliers and all with whom we do business, is crucial to Ministry's continued growth and success.

We intend to merit this trust by conducting ourselves according to the standards set out in our Principles and we ask our Suppliers to do the same, by following these Business Principles for Suppliers and our Supplier Code of Conduct.

Respectfully,



Nicholas Desien  
President and CEO



Sister Lois Bush  
Senior Vice President of Mission & Culture Integration  
& Corporate Integrity Officer

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## **Statement of Business Principles for Suppliers and Supplier Code of Conduct**

### **Mission**

The Mission of Ministry Health Care and each Ministry entity is to serve the poor and under-privileged by living our Promise and Keeping Patients First in all that we do. Ministry strives to maintain its high standard of performance and aims to maintain a long-term position in the communities we serve. We expect that our Suppliers will also follow these Business Principles for Suppliers and Supplier Code of Conduct in all of their dealings with Ministry, our employees and in any interactions they may have with patients or visitors of Ministry facilities.

We are committed to meeting all regulatory requirements. By doing so, we are able to:

- Better serve our patients through honest and ethical behavior
- Be recognized as a leader in our community by following the law
- Provide a good working environment for all as we always try to 'do the right thing'

## **Responsibilities**

Ministry recognizes seven (7) key areas of responsibility:

### **1. To Communities We Serve**

To protect the trust our Suppliers have in us by serving the community with quality and affordable health care and with the utmost integrity.

Catholic Health Care was built on a foundation of integrity. Our religious sponsor brought a values-based way of living to the communities that we have served since the 1800's. Throughout our history, Catholic Health Care built relationships based upon integrity and trust. Those relationships enable us to assume the challenging role of caring for those most in need and those least able to care for themselves.

Today, the complexity of our world requires that health care organizations actively pursue, support and nurture workplace integrity. Workplace integrity is an uncompromising commitment to both legal and ethical principles and it is critical for Catholic Health Care organizations to reaffirm our total commitment to integrity in our words and actions. Even the perception of fraud or abuse undermines the public's trust in us and our organization.

We are responsible for being good stewards of public and private resources as we are entrusted with government and commercial funds to provide necessary care and services to beneficiaries. We have a duty to prevent waste and to prevent or stop fraud of any kind.

### **2. To Patients**

To live our Promise of Keeping Patients First in all that we do and ensuring our patients receive the best possible care in the most affordable manner possible.

### **3. To Employees**

To respect the human rights of our employees (this includes letter and spirit of all laws), to provide our employees with good, safe conditions of work and competitive terms and conditions of service, to promote the best use of human talent and equal opportunity employment free of any harassment, to encourage the involvement of our employees in the planning and direction of their work and in the application of these Business Principles for Suppliers and our Supplier Code of Conduct. It is recognized that our success is dependent on the full commitment of all employees.

### **4. To Suppliers and All Those With Whom we do Business**

To seek mutually beneficial and win-win relationships with Suppliers, contractors and others with whom we do business and thus promote the application of these Business Principles for Suppliers and our Supplier Code of Conduct. A Supplier's ability to promote these Principles and live our Supplier Code of Conduct will be an important factor in our decision to enter into or remain in such relationships.

## **5. To Health, Safety and the Environment**

Patient health, safety and environmental impact are paramount to Ministry's Mission. As such, we firmly believe that our employees and Suppliers must also focus on health, safety and environmental impact to facilitate our commitment to delivering excellent patient care.

Importantly, and consistent with our Founding Sisters' high respect for the environment, Ministry is committed to protecting our environment by ensuring 'green' sustainability initiatives are taken into account in our planning and business decisions.

## **6. To Economic Principles**

Ensuring we stay in business and having enough money to fund our growth is essential to carrying out our responsibilities. Put simply, 'No money, No Mission'.

Criteria for investment decisions are not exclusively economic in nature but also take into account our Mission, which includes social and environmental considerations, and an appraisal of the security of the investment.

## **7. To Competition**

Ministry firmly believes in a free market economy and supports free enterprise. Ministry seeks to compete fairly and ethically and within the framework of applicable competition laws and expects that its Suppliers and all others with whom we do business will do the same.

We expect our Suppliers to understand the laws with which we are required to comply and to refrain from compromising, or asking our employees to compromise, our ability to remain in compliance with these laws. Most notably:

- **Anti-Kickback Statute**

Federal laws prohibit individuals and companies from offering or paying kickbacks to, or soliciting and receiving kickbacks, in exchange for referrals or acquisition of goods and services for which payment is made in whole or in part by Medicare or any state health care program. This means that if anything is given or received in order to promote referrals for health care services, the Anti-Kickback Statute may be violated. This includes free services, certain discounts or anything of value (e.g., certain gifts or entertainment).

- **Stark Law**

The Stark Law prohibits physician referrals to entities for Designated Health Services (DHS) where the physician, or an immediate family member of the physician, has a financial interest in, or relationship with, the entity. Financial interest includes both ownership and compensation interests.

The Stark Law defines Designated Health Services or DHS as any of the following services: (i) clinical laboratory services; (ii) physical therapy, occupational therapy, and speech-language pathology services; (iii) radiology and certain other imaging services; (iv) radiation therapy services and supplies; (v) durable medical equipment and supplies; (vi) parenteral and enteral nutrients, equipment and supplies; (vii) prosthetics, orthotics and prosthetic devices and supplies; (viii) home health services; (ix) outpatient prescription drugs; and (x) inpatient and outpatient hospital services. (See 42 CFR § 411.351.)

- **HIPAA and HITECH**

The Health Insurance Portability and Accountability Act (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (HITECH) require healthcare providers to implement safeguards to protect the privacy and security of patient protected health information. This responsibility is passed on to those Suppliers who are providing services on behalf of Ministry that involve access, use, and/or disclosure of our patients' protected health information. Privacy and security requirements are outlined in the business associate agreement made a part of Supplier contracts and business agreements as applicable. Ministry also has the same expectations for safeguarding the privacy and security of confidential business and proprietary information.

- **Conflicts of Interest**

We have policies in place to ensure that our managers, directors and officers act in the best interests of Ministry when making business decisions and avoid participating in decisions in which they might have a Conflict of Interest. We expect that our Suppliers will also avoid any relationship or activity that might create or give the appearance of a conflict and will refrain from putting our employees and others who work with Ministry in a position in which there is, or appears to be, a conflict between their personal interests and the interests of Ministry. Ministry selects its Suppliers and contractors in a non-discriminatory manner and based on appropriate quality, service, cost and ability to supply a range of materials and services. A decision to hire a Supplier or contractor must never be based on personal interests or interests of family members, but must be in the best interests of Ministry.

By engaging in business with Ministry Health Care or any Ministry entity, Suppliers are required to refrain from participating in or in any way encouraging our employees or others acting on our behalf to engage in any transaction, contract or investment that creates or appears to create a Conflict of Interest. As such, Suppliers should not (1) engage in personal business arrangements (e.g., consulting arrangements, etc.) with our employees or others acting on our behalf; or (2) have business discussions with an employee or anyone else on behalf of Ministry if the Supplier is aware that the individual or a member of an individual's family has a financial relationship with the Supplier, the Supplier's organization, or a related organization.

- **Gifts and Entertainment**

Ministry's acceptance of gifts or entertainment opportunities from Suppliers could be perceived as an improper inducement of a business relationship. With limited exceptions noted below, Ministry employees and others working on our behalf are prohibited from accepting gifts and entertainment opportunities from Suppliers. We respectfully ask all Suppliers to avoid putting our employees in the position of having to refuse gifts and entertainment opportunities. Ministry policies prohibit employees from using their position with Ministry to solicit or provide any cash, gifts or free services from or to any Ministry customer, Supplier or contractor for personal benefit. This prohibition does not extend to solicitations made on behalf of and for the benefit of a hospital foundation or other fundraising in furtherance of Ministry's mission. Any such Supplier donation or decision not to donate will in no way impact future purchasing decisions by Ministry.

Ministry expects all Suppliers to comply with Ministry's Gifts and Entertainment Guidelines for Suppliers. Suppliers can obtain a complete copy of these Guidelines by contacting the Supply Chain office at the number referenced in the "Reporting" Section below or by clicking on the "Gifts and Entertainment Guidelines for Suppliers" link on Ministry's extranet.

The following are examples of our current guidelines regarding acceptance of gifts and entertainment opportunities from Suppliers.

- Nominal gifts such as logo items, pens, calendars, caps, shirts are acceptable.
- Reasonable invitations to business-related meetings, conventions, conferences or product-training seminars may be accepted; however, Ministry employees, and those who have a relationship with or provide services on behalf of Ministry, are expected to pay their own way and obtain reimbursement consistent with our internal business reimbursement policies.

### **Reporting**

Please contact our office by calling 715-343-3405 with any questions regarding our Business Principles for Suppliers or Supplier Code of Conduct. We also request that you notify us if you are aware of any violations of our Business Principles for Suppliers or Supplier Code of Conduct.