



COMPLIANCE STANDARDS FOR VENDORS

Introduction

It is the policy of Archbold that all employees, medical staff members, referral sources, and other business contacts will demonstrate high ethical standards and comply with all federal and state laws which may apply to any aspect of Archbold's operations when conducting activities with, at, or concerning Archbold.

Archbold has designed and implemented a formal corporate compliance program in support of its long-standing tradition of providing needed health care services to the community in an ethical and legal manner. As a condition of a vendor's initial and continued association with Archbold, a vendor is required to comply with these compliance standards for vendors. In addition, if a vendor is acting as an independent contractor that employs personnel who regularly furnish patient care, billing or accounting related services on the premises of any Archbold entity, the vendor also is required to assure that such employees comply with Archbold's Code of Conduct for All Employees. This information is accessible on Archbold's website at www.archbold.org by clicking on Vendor Information at the bottom of the homepage. Violation by a vendor's employees of the standards and procedures contained in the Code of Conduct for All Employees may result in the termination of a vendor's association with Archbold.

Standards

For purposes of the following standards, the phrase, "any person associated with Archbold," means or includes employees, board members, as well as members of the medical staff who participate in the selection of the type and/or vendor of medical supplies or devices purchased by Archbold.

Money, Gifts, Gratuities, Favors, Entertainment, and Other Vendor-Sponsored Activities

- A vendor will not offer or give money, gifts, gratuities, favors, entertainment, or other such activities to any person associated with Archbold in order to influence such person in making decisions regarding the use of the vendor's products or services, or the referral or recommendation of patients to the vendor.
- A vendor will not offer or give money, gifts, gratuities, favors, entertainment, or other such activities to any person associated with Archbold to induce such person to forego normal business or professional considerations in making decisions that affect Archbold.

- A vendor will not offer any person associated with Archbold compensation, such as, but not limited to, honorariums, payment for consulting arrangements or completion of various product or evaluation surveys.
- A vendor will not offer any person associated with Archbold payment of expenditures such as, but not limited to, education or travel expenses.
- A vendor will not solicit or accept money, gifts, gratuities, favors, entertainment, or other such activities offered to induce the vendor to forego normal business or professional considerations in making decisions that affect Archbold.
- A vendor will not offer or give any gift or entertainment that exceeds the value of \$25.00 to any person associated with Archbold who may control or exercise influence over the vendor's association with Archbold, unless the gift or entertainment can be consumed or fully used at the time it is offered.
- In any 12-month period, a vendor will not offer or accept gifts, lunches, dinners, or entertainment with an aggregate value in excess of \$100.00 to or from any person associated with Archbold who may control or exercise influence over the vendor's association with Archbold.
- A vendor will never offer or give money to any person associated with Archbold who may control or exercise influence over the vendor's association with Archbold.
- A vendor may be requested to submit an accounting of expenditures, money, gifts, gratuities, entertainment, educational activities or research offered or given to any person associated with Archbold. The President of Archbold may periodically request this accounting.

Charitable Contributions

- A vendor may make charitable contributions to Archbold in the same manner and under the same conditions as other entities.
- Although a vendor's charitable contribution will be greatly appreciated, it will not affect Archbold's professional judgment regarding the goods or services it purchases, recommends, or provides to its patients.
- If a vendor wishes to make a charitable contribution, the vendor must contact the President of Archbold Foundation or the President of Archbold Medical Center, Inc.

Compliance With the Law and Recordkeeping

- A vendor must comply with all laws and legal requirements applicable to the

vendor's provision of services or supplies to Archbold.

- A vendor will ensure that all of the vendor's billing statements and invoices accurately reflect the services and supplies provided and the correct charges for those services and supplies.
- A vendor will not intentionally, knowingly or recklessly prepare or submit false, fraudulent or misleading claims or make false statements to any government entity or third-party payor in connection with the vendor's provision of services or supplies to Archbold.
- A vendor will maintain adequate and accurate documentation and records supporting the services and supplies provided to Archbold and the charges billed to Archbold.
- A vendor will protect the confidentiality of sensitive patient information and avoid disclosure of that information unless supported by legitimate business purposes and permitted by law.

Employment of Medical Center Personnel

- Although a vendor may offer employment to Archbold personnel, vendor agrees that such personnel will not be permitted to conduct the vendor's business directly with Archbold, or any other Archbold personnel, for a period of two years following employment by the vendor.

Education About False Claim Recoveries

- Section 6032 of the Federal Deficit Reduction Act mandates that contractors and agents are aware of Archbold's policy regarding "Education About False Claims Recoveries." This information is accessible from Archbold's website, www.archbold.org, by clicking on the "Vendor Information" link at the bottom of the homepage and then selecting "Education About False Claims Recoveries."