

Healogics®

The power to heal

HEALOGICS, INC.

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VENDOR CODE OF CONDUCT

Updated October 2015

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Section 1: Introduction

- 1.1 The information, guidelines and policies contained in this Vendor Code of Conduct are applicable to all entities and their representatives conducting business or wishing to conduct business with Healogics, Inc. and affiliated companies (“Healogics”). In order for this Code of Conduct to be effective and applicable federal and state laws be adhered to, all Healogics staff are responsible for supporting and following the guidelines and policies as well.
- 1.2 Wound care medical supplies and products play an integral role in the successful treatment of and outcomes for the patients at the Wound Care Centers® (“Centers”). Healogics strives to treat each vendor and representative of these product and service entities fairly and professionally. Healogics is vendor neutral. Hospital partners maintain control of actual product and technology selection for use in their Center. Healogics does not endorse any specific brand of wound care product, technology or supplies.
- 1.3 The Healogics’ Code of Conduct and Ethics (healogics.com/about/compliance) requires all Healogics employees and agents to use prudent judgment and comply with all applicable laws in all of their transactions and interactions with vendors. In addition, Healogics is a vendor neutral entity and requires its employees and agents to support vendor neutrality as well. Healogics has created this updated Vendor Code of Conduct to reinforce the guidelines and procedures for continued interactions between the product/supply vendor and Healogics personnel in Centers.
- 1.4 All vendors, whether contracted or not contracted by the hospital or Healogics, are expected to adhere to this Vendor Code of Conduct when conducting business at a Center and interacting with Center personnel. Adherence to the Vendor Code of Conduct promotes business conduct in a manner that supports compliance with various federal and state regulations. Compliance with this Vendor Code of Conduct is mandatory in order to support and promote a positive professional relationship among vendors, Healogics and the hospitals we represent.

Section 2: Vendor Visits to Centers

2.1: Vendors visiting Centers must:

- Schedule a visit with Program Director (PD) or Clinical Nurse Manager (CNM) in advance. Vendors may be turned away by the PD or CNM at their discretion.
- Conform to hospital policies at all times during visit.
- Identify themselves as a visiting vendor, have identification that is clearly visible on their person.
- The PD or Clinical Coordinator (CC) shall verify the identity of the Vendor by viewing a valid driver's license or other government issued picture identification.
- Dress in appropriate business attire (scrubs are not permitted).
- Ensure all new electrical equipment is reviewed and approved by the hospital's clinical engineering/biomedical department before arrival to CENTER.
- Ensure all wound care supplies or products are reviewed and approved by the hospital's materials management department before arrival to the Center.
- Provide information on product that conforms to the Medicare Local Coverage Determination (LCD) in place for the state or jurisdiction where the hospital is located. If the Medicare Administrative Contractor (MAC) or Fiscal Intermediary (FI) does not have a formal LCD in their state or jurisdiction then the manufacture's package insert or guidelines must be followed for appropriate use of the product or supply being used.
- Follow all instructions regarding infection control practices and fire safety.

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2.2 Vendors visiting Centers may not:

- Enter patient rooms, unless: a) patient and physician/physician extender have provided verbal or written consent, b) the consent is documented as a note in the medical record and c) vendor is accompanied by the physician.
- Access or attempt to access the Wound Path or i-heal® databases or reports printed from these databases.
- Access or attempt to access patient medical records.
- Vendors may not “wander” in the Center but must be accompanied at all times by the CC or PD or their designee.
- Assist or perform any care, treatment or service to the patient that involves physical contact.
- Distribute reimbursement, billing or coding information to Center staff or physicians while in the Center. (Reimbursement questions from the Healogics staff should be directed to their area’s Revenue Cycle Manager and/or VP of Reimbursement.)
- Take photographs, unless allowed by hospital policy and patient’s consent is documented in the medical record.
- Meet with the center’s medical director and/or panel physicians without the consent of the PD.
- Engage in unauthorized selling or lobbying for a product. Such behavior shall be grounds for removal from the Center.
- Participate in general observation for educational purposes.
- Distribute marketing materials at the Center without the consent of the Center’s PD.
- Promote any off label use of their products during their site visits, in email communications or during phone conversations with Center staff or panel physicians. Exception: When ordered by a physician, a product may be used for an off label purpose when the Medicare Administrative Contractor (MAC) or Fiscal Intermediary (FI) for that area allows payment for the off label use using the appropriate ICD9/10 code. Center PD should contact their Healogics Reimbursement Manager if they have any questions regarding this off label use.
- In the event a Vendor is promoting an off label use (not addressed by exception above), immediately notify the Healogics Compliance Department (compliance@healogics.com).

2.3 In all situations the vendor and other product company representatives must conduct themselves in an ethical manner and not engage in any unlawful or unacceptable social behavior.

Section 3: Educational Activities

3.1 In-service Training: Product or Pharmaceutical vendor representatives who wish to conduct educational events on-site at Centers must:

1. Obtain CNM or PD approval prior to conducting the event
2. Be a hospital approved vendor.
3. Be qualified clinical product representatives of the vendor or manufacturer.
4. Consult all hospital policies relating to on-site in-service training sessions and comply with such policies.
5. Maintain patient confidentiality at all times (in-service training should not be conducted in presence of patients or use patient-identifiable information, to preserve their privacy).
6. Comply with Healogics Gift policies outlined in Healogics Code of Conduct and Ethics, especially if meals are provided
7. Vendors may provide assistance with organizational activities such as: educational content, sponsorship, food, venue, invitations, generating attendance with approval from Healogics Marketing/Community Education. Amount spent on event should be commercially reasonable by local standards.
8. Vendor Presentation materials must:
 - a. Be educational
 - b. Present product as one of the available modalities
 - c. Not represent or refer to Healogics and vendor as partners
 - d. Not include the Healogics logo
 - e. Not indicate that Healogics endorses any vendor
9. Vendor branded sales and marketing materials cannot be left in any of the centers or with staff to avoid any appearance that Healogics is promoting a particular vendor or its products.

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3.2 Corporate Sponsored Training Offering Continuing Medical Education (“CME”) and Continuing Education Units (“CEU”): Healogics offers accredited training for physicians, nurses and HBO technicians that takes place at the corporate office in Jacksonville. After training, a Reception is held off-site that is optional to physician and clinical attendees and does not provide any additional CMEs or CEUs.

1. During the educational training Vendors:
 - Will work directly with the Healogics Learning & Development Department to obtain approval to attend.
 - May provide free samples for educational purposes
 - May set up their product for use,
 - May attend and observe the course
 - May discuss any commentaries or discrepancies in the training they observed with the Vice President of Learning & Development.
 - Are not allowed to speak, assist or train
 - During the reception following the educational piece, vendors may exhibit and speak at a reception for a fee.

3.3 Healogics also holds several regional physician symposiums that have both educational and reception components. Vendors are not allowed in the area where the CME accredited education is being provided. The reception is optional for physician attendees. The reception area will be located in a separate location from where the CME accredited education was delivered. Vendors may pay to sponsor a booth in the reception area, and may talk to physician attendees.

3.4 Vendor Sponsored CME and CEU Events in the Field: Vendors may work with PDs to develop vendor-sponsored events that provide CME and CEUs, approved through the Accreditation Council for Continuing Medical Education or American Nurses Credentialing Center respectively. Provide all educational materials used in presentation to CNM and PD for approval via e-mail at least 10 days prior to event. Healogics reserves the right to make changes to materials.

Section 4: Free Incentives to Use Products

4.1 Healogics is required to follow hospital policy when using free samples of product. Centers are not allowed to accept offers of free incentives to use vendor products, without approval from the Healogics Compliance Department (compliance@healogics.com) to ensure there is no inducement to use the product. For example: You can't get something for free for using a product. Any offers for free items/equipment in exchange for using a vendor product need to be reviewed and approved by the Healogics Compliance Department prior to approaching the Centers. Examples of equipment offers include, but are not limited to, Free Walker Boots.

Section 5: Insurance Verification Programs

5.1 Initial Approval & Agreement

5.1.1 Vendors with an insurance verification program must seek review and approval from Healogics Compliance Department prior to presenting the program to the Centers.

5.1.2 The following information must be provided to Healogics Compliance Department (compliance@healogics.com) for review:

- Flow of Protected Health Information (“PHI”)
- Details of how PHI will be secured at every point in the information flow and how the PHI is stored and destroyed, including timeframes.
- Forms and PHI content that will be required from the Center’s medical record
- Timeline of the insurance verification process
- Name of third party vendor, receiving and conducting the insurance verification (if applicable)
- Name and contact information for Vendor’s compliance contact.
- Will PHI be used for marketing purposes?
- Sample of any reports provided by third party vendors
- Any additional information the Compliance Department requests

5.1.3 Upon approval of the vendor’s insurance verification program process, the vendor’s corporate office is required to sign the following agreements with Healogics:

- Insurance Verification Agreement
- Vendor Certification Form
- Business Associate Subcontractor Agreement

5.2 Under no circumstances will it ever be appropriate for Vendor, or its subcontractor, to disclose patient PHI to vendor representatives. Violation of this stipulation may result in a HIPAA breach and notice of such to the Office of Civil Rights, the hospital's Privacy Officer and the patient. In the event of an accidental breach of patient PHI, the Healogics Compliance Department must be notified immediately. All Healogics employees must comply with all corporate HIPAA policies and procedures as conditions of employment.

Section 6: Vendor Program Approval Process

6.1 New vendor programs must be approved by Healogics Corporate before being presented to any Centers PDs or implemented at the Centers. To obtain approval, Vendors must submit all program details, procedures and/or agreements to the Healogics Compliance Department (compliance@healogics.com). Programs will be reviewed and approved during the quarterly Healogics Compliance Committee meetings.

Section 7: Penalties

7.1 It is the responsibility of each Healogics employee to report any violations of the Vendor Code of Conduct to the Healogics Compliance Department (compliance@healogics.com). Each report will be fully investigated and corrective action will be taken where appropriate. Vendors and Healogics corporate offices will work together to determine appropriate corrective action for vendor representatives who do not follow these guidelines. Possible corrective actions are listed below:

1. Healogics Vendor Code of Conduct Re-education
2. Temporary suspension from visiting Centers
3. Prohibition of access to the Centers

Section 8: Healogics Corporate Contacts

Healogics Compliance Program

888.999.9460

compliance@healogics.com