



Vendor Interaction Policy

- All Bristol Hospital (BH) BH Development Foundation BH Multi-Specialty Group
 BH EMS Bristol Home Care & Hospice Agency Ingraham Manor

Reference Code: C-09

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PURPOSE:

To provide guidance regarding appropriate interactions of the Bristol Hospital and Health Care Group (BHHCG) with vendors and other business partners and to minimize undue influence or perceived undue influence of vendors and other business partners on the business decisions made by BHHCG.

POLICY STATEMENT(S):

BHHCG shall, in all interactions with vendors and other business partners, comply with applicable law, meet ethical standards, avoid or minimize conflicts of interest, and promote fair and open dealings.

DEFINITIONS:

For the purposes of this Policy, the following definitions shall apply:

BHHCG: Includes Bristol Hospital, the Bristol Hospital Development Foundation, the Bristol Hospital Multi-Specialty Group, Bristol Hospital EMS, Bristol Home Care & Hospice Agency, and Bristol Health Care - d/b/a Ingraham Manor.

Entertainment: Any recreational activity that a vendor pays for. Examples include concerts, movies, golf outings, football games, etc.

Gift: Anything of value, in cash or kind, received for which adequate consideration has not been provided is deemed a Gift, unless an exception applies

Legitimate Business Meeting : A conference or meeting, held at an appropriate location, where **a)** The gathering is primarily dedicated, in both time and effort, to promoting specific scientific and educational activities (at least one or more presentations should be highlighted), and **b)** the main incentive for bringing attendees together is to further their knowledge on the topics being presented.

Occasional or Infrequent: No more than one (1) to two (2) times per twelve month period.

Vendor and Other Business Partners: Any person or entity that provides or may provide goods or services for the operations of BHHCG.

SCOPE:

Organization Wide

PROCEDURE:**1. General**

BHHCG is expected to maintain appropriate business relationships with vendors and other business partners. BHHCG will not:

- a. Accept Gifts, entertainment, meals, or other incentives given for the purpose of influencing purchasing or contracting decisions, or that otherwise could appear to improperly influence a decision made on behalf of BHHCG.
- b. Offer or accept Gifts, entertainment, meals, or other incentives given for the purpose of encouraging or rewarding patient referrals.
- c. Offer, accept or solicit Gifts, entertainment, meals, or other incentives that could be perceived as a bribe, payoff, deal; or any other attempt to gain a competitive advantage.

Occasional non-cash items (e.g. pens, note pads, coffee mugs) of nominal value, less than \$25, up to \$75 /vendor/year, may be accepted but are generally discouraged.

Occasional perishable or consumable items (e.g. flowers, fruit, candies, etc.) of nominal value given to a department or unit and provided it is shared with co-workers may be accepted but are generally discouraged.

Vendors or business partners expressing an interest in providing more substantive Gifts that serve clinical, educational or programmatic functions must be directed to the Bristol Hospital Development Foundation Office.

2. Meals

In general, BHHCG is discouraged from accepting meals paid for by vendors and other business partners. An occasional meal or refreshment may be accepted provided all the following requirements are met:

- a. Such events are infrequent;
- b. The event involves a legitimate business discussion;
- c. The setting for the meal is appropriate to discussing business (e.g. office or restaurant) and the host is present; and
- d. The vendor or business partner's expense is modest which, as a general rule, means the cost of meals and refreshments does not exceed \$25 per person.

The above requirements do not apply to meals and refreshments provided in connection with a Legitimate Business Meeting sponsored by a vendor or other business partner for the benefit of all attendees. Vendors may provide "lunch and learn" opportunities as long as:

- a. The value of the meal is subordinate to the value of the education provided;

- b. The vendor or other business partner does not choose or influence the choice of speaker or topic;
- c. The vendor or other business partner does not market its products during the conference or educational program;
- d. Vendor or other business partner sponsorship is infrequent; and
- e. The event involves a legitimate educational purpose.

3. Entertainment or Social Activities

BHHCG should politely decline Gifts offered by vendors and other business partners that involve entertainment or social activities such as free or discounted tickets to sporting events, theater or concert events, golf outings, travel and lodging, etc. BHHCG may attend an entertainment or social event with a vendor or other business partner provided BHHCG, not the vendor, pays the BHHCG cost (e.g. the face value of a sporting event ticket) to attend such events. Any exceptions to this policy should be infrequent provide a legitimate benefit to BHHCG and/or its patients. Exceptions require the advance approval of the accepting party's vice president.

4. Events

Vendors and other business partners may donate to charitable fundraising events that benefit BHHCG. These events may include social or entertainment activities (e.g. golf or dinner) where BHHCG is invited to participate with and at the cost of a vendor or other business partner. These invitations may be accepted with advance approval of the accepting party's vice president.

5. Education

BHHCG may accept invitations to attend or participate in local or out-of-town programs, workshops, seminars and conferences sponsored by a vendor or other business partner that have a legitimate educational purpose or otherwise support a BHHCG business objective (e.g. product training) provided such events are infrequent and advanced approval of the accepting party's leadership is obtained and BHHCG, not the vendor, pays for any related travel and overnight lodging cost incurred. Any exceptions to this policy should be infrequent provide a legitimate benefit to BHHCG and/or its patients. Exceptions require the advance approval of the accepting party's vice president.

6. Speaking Fees, Honorarium and Consulting Compensation

BHHCG will not accept speaking fees, honorarium or consulting compensation provided for the purpose of influencing purchasing or contracting decisions, or that otherwise could appear to improperly influence a decision made on behalf of BHHCG. All speaking fees, honorarium or consulting compensation provided by vendors and other business partners to BHHCG must be reported in accordance with the Conflict of Interest policy.

In all cases BHHCG should use common sense and good judgment in accepting and refusing Gifts of any kind in accordance with this Policy. All facts and circumstances must be considered and any questions should be discussed with the Compliance Office.

MISCELLANEOUS:

This policy may be revised, supplemented, or rescinded at any time as BHHCG deems appropriate in its sole and absolute discretion, without prior notice. This policy (and any other policy) does not constitute a contract of employment and does not in any way limit or modify employees' at-will employment status.

RELATED POLICIES:

Code of Conduct

C-02 Compliance Program Policy

C-06 Conflict of Interest Policy

C-08 Patient Gifts Policy