

# Sentara Healthcare Guidelines for Vendor Relations

**Purpose:** Provide guidelines for ethical conduct for the conduction of business to all Sentara Healthcare employees, physicians, vendors, individuals and organizations who provide products, equipment, services, or tangible support to Sentara Healthcare.

**Rationale:** The integrity of the system rests upon our willingness and ability to conduct our affairs in a legal business manner based on sound business principles and standard ethical guidelines. These guidelines lay out a set of internal expectations and provide specific direction for employees, physicians, vendors, individuals, and organizations that wish to conduct business with Sentara Healthcare.

**Scope:** These guidelines apply to all Sentara Healthcare directors and officers, staff, employees, managers, physicians and associated staff, volunteers, consultants, and any other agents, as well as third party vendors and their agents.

Sentara Healthcare employees, physicians, or other individuals who have an actual or perceived conflict of interest shall not enter into negotiations resulting in purchases of products, equipment, or services. A conflict of interest exists whenever an individual (family, business or personal ties) personally can gain, directly or indirectly, from the outcomes of a business transaction.

## General Guidelines

1. All Sentara employees, physicians, vendors, individuals, or organizations etc. should refrain from any private business or professional activity that would create a conflict between personal interests and the interest of Sentara Healthcare. No Sentara employee or employed physician shall use their position in any way to induce another person, vendor or organization to provide any benefit to themselves, or persons with whom they have family, business, personal, or financial ties. Physician's employees cannot sell products, equipment, or services directly to Sentara Healthcare.
2. Employees, physicians and/or physician family members in a position to influence product, equipment, or service decisions can not act as a sales representative for a vendor, supplier, distributor or other external relationship for the purpose of selling products, equipment, or services to Sentara Healthcare.
3. Part time or flexipool Sentara Healthcare employees may not represent any vendor, individual, or organization, for the purpose of selling any products, equipment or services to Sentara Healthcare.
4. Employees who leave Sentara Healthcare to become a vendor representative are prohibited from selling any products, equipment, or services to Sentara Healthcare for a period of 24 months from the date of final separation.

5. Sentara's proprietary information shall be disclosed solely on a need-to-know basis to prevent unfair competitive advantage and/or other detrimental consequences to Sentara Healthcare. All Sentara employees are ethically obligated to protect certain confidential and proprietary business information.
6. Association with vendors or their representatives at modest luncheons or dinners is appropriate if actual work is done with the vendors during the meal, such events are infrequent, and they are pre-approved by a system manager. Travel to business organization meetings or approved site visits may be acceptable if the specific business reason for the occasion was approved prior to the event by the appropriate facility Chief Executive or System Vice President. Site visits provide education and there is no obligation by the system to pursue purchase of the vendor's products, equipment, or services.
7. Site visits to vendor headquarters or showcase sites in order to gain firsthand knowledge about a vendor and its products and services are an acceptable business practice if conducted on an infrequent basis. The Chief Executive of the affected facility or the appropriate System Vice President must be fully informed about the visit, its purpose, and intended benefit to Sentara. Operating units scheduling site visits shall arrange for appropriate Materials Management contracting representatives to attend or be closely associated with the project.
8. Potential Conflicts of Interest are to be reported to the facility Chief Executive, or System Vice President, Compliance Officer, and to the System Vice President of Materials Management, who will assist in selecting an alternative associate or group to facilitate the business transaction.
9. These guidelines require compliance with Sentara's *Code of Business Conduct*.

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