

Corporate Compliance Vendor Code of Conduct

A Message to our Vendors:

At Baystate Health, “doing the right thing” means more than just following laws, policies, and procedures— it means maintaining the highest standards of ethics and integrity in everything we do. Our high standards are consistent with Baystate Health’s goal of delivering excellent patient care. In keeping these core values, Baystate Health does business with organizations that share our commitment to ethical and fair behavior.

This Baystate Health Vendor Code of Conduct (“Code of Conduct”) applies to all vendors (i.e., providers of any goods or services) of Baystate Health, Inc. and its affiliates (individually and collectively referred to as “Baystate Health”).

This Code of Conduct is a general statement of the expectations of Baystate Health with respect to its vendors; it is not in lieu of, but rather is in addition to, any other vendor obligations to Baystate Health under law, contract, or otherwise.

We expect our vendors to act ethically, legally, fairly, and responsibly at all times. Vendors are expected to comply with all relevant law, including statutes, codes, and regulations, applicable to their operations, which may include, but are not limited to, laws concerning labor and employment practices, workplace standards for environmental compliance and occupational health and safety, and general business practices.

Baystate Health shall make every reasonable effort to contract with vendors meeting the standards prescribed by this Code of Conduct. Vendors are encouraged to provide evidence of their compliance with these standards, and upon request shall cooperate with Baystate Health to demonstrate and confirm compliance with this Code of Conduct.

Nondiscrimination. Vendors shall comply with relevant law prohibiting discrimination in the workplace and shall not discriminate in their employment practices on the basis of race, color, religion, national origin or ancestry, sex, pregnancy, sexual orientation, sexual identity, age, disability, or military status.

Affirmative Action. Each vendor shall be an equal employment opportunity employer and during the performance of any Agreement, it will comply, if applicable, with Federal Executive Order 11246, as amended; the Rehabilitation Act of 1973, as amended; and Public Law 101-507 for the benefit of socially and economically disadvantaged individuals.

Freedom of Association and Collective Bargaining. Vendors shall recognize and respect the rights of employees to the freedom of association and collective bargaining, including if applicable, the rights set forth in the National Labor Relations Act, as amended, or such other labor relations laws as may be applicable.

Labor Standards: Wages, Hours, Leaves, and Child Labor. Vendors shall recognize and respect the legal rights of employees concerning minimum and prevailing wages, wage payments, and maximum hours and overtime; legally mandated family, childbirth, and medical leaves and return to work thereafter; and limitations on child labor, including, if applicable, the rights set forth in the Federal Fair Labor Standards Act, the Federal Davis-Bacon Act, the Federal Family and Medical Leave Act, and any state laws defining such labor standards.

Health and Safety. Vendors shall provide a safe and healthful working environment to prevent accidents and injury to health arising out of or occurring in the course of work or resulting from the operation of vendor's facilities. During the performance of any agreement, all products, services, use of equipment, working conditions, employee training or licensing requirements, and activities performed by the vendor or the vendor's subcontractors shall be in full compliance, if applicable, with the Federal Occupational Safety and Health Act, and all other applicable federal, state, and local laws, rules, regulations, and ordinances, including but not limited to the environmental safety and health requirements set forth in 29 Code of Federal Regulations, 40 CFR, and 49 CFR.

Forced Labor. Vendors shall not use or purchase supplies or materials that are produced by using any illegal form of forced labor.

Harassment or Abuse. Vendors shall not subject workers to any sexual or other unlawful harassment or hostile work environment, whether physical, verbal, or psychological, in connection with their employment, either on or off the job.

Environmental Protection. Vendors shall comply with relevant law concerning environmental compliance, including statutes, codes, and regulations, applicable to their operations. Such compliance includes: obtaining and maintaining appropriate environmental permits; proper handling and disposal of hazardous materials; monitoring, controlling, and treating discharges generated from operations; and conducting operations in a manner that conserves resources.

Foreign Law. Vendors and vendors' suppliers operating under foreign law shall comply with all foreign laws applicable to the subject matter of this Code insofar as they are consistent with the provisions of this Code. Such vendors or suppliers shall also comply with all provisions of this Code insofar as they do not violate applicable foreign law. Baystate Health shall strive to avoid doing business with vendors that, for whatever reason, do not or cannot comply with the provisions of this Code.

Business Practices. Baystate Health expects its vendors to conduct their business according to the highest ethical standards. In addition, Baystate Health expects vendors to be responsible for compliance with relevant law concerning the protection of "whistleblowers" within the vendor's organization, and for implementation of an internal vendor compliance program, or related practices or efforts, to promote business compliance initiatives within the vendor's organization.

Baystate Health prohibits vendors from giving money, tips, cash substitutes, or other remuneration to Baystate Health employees. Modest and reasonable offsite business entertainment, such as a lunch with a clear business purpose, may be provided but is not expected. Vendors may obtain a copy of the current Baystate Health policies relating to business gifts and gratuities from the Baystate Health Compliance office at 413-794-5840. Vendors shall avoid the appearance of, or actual, conflict of interest. Vendors and their employees or representatives shall not deal directly with any Baystate Health employee who holds, or whose spouse, domestic partner, or other family member holds, a significant financial interest in the vendor's organization.

This code of conduct is subject to revision in Baystate Health's continuing effort to improve its sourcing and procurement practices. Please review this Code of Conduct carefully and become familiar with the principles that guide the conduct of you and your organization as a Baystate Health vendor.

On site Vendors. In addition to the above, any on site vendor shall abide by the Baystate Health Corporate Compliance Code of Conduct as found on-line in the Corporate Compliance section of BaystateHealth.com.

If you have any questions, or comments, contact the Baystate Health Compliance Office at 413-794-5840.

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