

# Vendor Code of Conduct

## Overview

HNL Lab Medicine manages vendor relationships in a fair and reasonable manner, free from conflicts of interest, and consistent with applicable laws and good business practices. We promote competitive procurement to the extent it is feasible. Our selection of vendors is made on the basis of objective criteria including quality, technical excellence, price, adherence to schedules, service, and maintenance of adequate sources of supply. Our purchasing decisions are made based on the vendor's ability to meet our needs, rather than on personal relationships.

We employ ethical standards in business practices in source selection, negotiation, determination of contract awards, and the administration of all purchasing activities. We also comply with contractual obligations to not disclose vendor confidential information, unless required by law, permitted under the contract or otherwise authorized by the vendor.

HNL Lab Medicine is committed to ensuring compliance with all laws and regulations applicable to our operations and doing so in a manner consistent with the highest professional and ethical standards. We are committed to honest business dealings with our vendors.

Our Core Values and Guiding Principles are the foundation of our Compliance Program. Sharing in our commitment to them is a critical component of living our Mission and achieving our Vision.

## Mission

To inform, improve and guide those we serve – one test, one answer, one insight at a time.

## Vision

Inspiring a healthier and better-informed world.

## Core Values

**HONESTY:** You are known for candor, authenticity, transparency and treating people with respect. You debate constructively, speak to people directly to resolve issues and are willing to have difficult conversations in the spirit of mutual trust and benevolent intent.

**ACCOUNTABILITY:** You take responsibility for results and learn from experiences. You are willing to make tough decisions and take smart risks. You don't deflect responsibility or finger-point. You are proactive, learn from mistakes and own results completely.

**AGILITY:** You are curious, proactive, innovative and strive to improve everyday. You keep us nimble by minimizing complexity and taking action, challenging the status quo and finding better solutions to continuously improve our outcomes.

**COLLABORATION:** You focus on innovating together and extend your efforts beyond your role. You listen well, compromise and are considered a great partner. The sum of joint efforts leads to superior results and you always maintain a safe and secure environment.

**COMPASSION:** You act in the best interest of your co-workers, partners and customers.

You are kind and care about the well-being of everyone that you work with and for. You stay calm, show respect and foster a sense of belonging for all.

## Guiding Principles

The following principles should guide our interactions:

- OUR customers are our lifeblood
  - Exceed our customers' expectations and they will grow with us
- OUR shareholders have placed their trust in us
  - Create value in everything we do
- OUR people are our company
  - Develop our people's abilities and use their talents productively
- OUR colleagues depend on us
  - Support each other so we can all be effective together
- OUR vendors are our partners
  - Help our vendors succeed and they will help us succeed
- We impact our communities
  - Improve our communities through responsible and caring leadership

Vendors and their representatives are expected to conduct business in accordance with HNL's Vendor Code of Conduct, values and guiding principles, contract terms, and in compliance with federal, state and local laws, regulations and rules. HNL expects its vendors to have their own code of conduct that addresses expectations for business conduct and to maintain a hotline or other pathway for anonymous reporting to ensure vendor employees can report any alleged misconduct on the part of the vendor or HNL.

You can help us keep our commitment by complying with the standards set forth in this Vendor Code of Conduct. By its acceptance of any purchase order from HNL, the vendor acknowledges acceptance of this Vendor Code of Conduct and intention to comply with its requirements.

## Professional Conduct

All vendors are expected to be positive and courteous. Conversations with staff should be minimal and are expected to be professional. Socializing with staff should be kept to a minimum and not interfere with the staff conducting their duties.

## Gifts

Employees may not accept gifts or gratuities from vendors, with the exception of novelties of nominal value. Gifts received which are unacceptable, according to our guidelines, will be returned to the donor. Vendors are never permitted to accept or give anything of value, even if nominal in value, to induce or reward referrals of business. Gifts of cash or cash equivalents are also not permitted.

## Conflicts of Interest

Our employees are expected to hold the best interest of HNL in the highest regard, ensuring there are no financial or other relationships with any vendor that may conflict or appear to conflict with their obligations to HNL. We expect our vendors to bring any actual, potential, or perceived conflicts of

interest involving their employees or an employee's family member to the attention of HNL, preferably to an individual other than the person who has a relationship with the vendor. Disclosure should also be made via the online disclosure form found at: [www.hnlconflictinterest.ethicspoint.com](http://www.hnlconflictinterest.ethicspoint.com). HNL will evaluate the disclosure and wherever possible, work together with the vendor to mitigate or resolve the conflict.

## Fraud, Waste and Abuse (FWA)

HNL promptly investigates reports of alleged violations of law, regulations or policies involving a vendor, including allegations of FWA involving federal or state health care programs. Vendors are expected to fully cooperate in such investigations and, where appropriate, take corrective actions in response to confirmed violations. The Federal False Claims Act and similar state laws make it a crime to present a false claim to the government for payment. These laws also protect "whistleblowers" – people who report noncompliance or fraud, or who assist in investigations, from retaliation. HNL policy prohibits retaliation of any kind against individuals exercising their rights under the Federal False Claims Act or similar state laws.

## Deficit Reduction Act of 2005 (DRA) Requirements

The DRA requires HNL to provide detailed information to its employees, contractors and agents regarding the Federal False Claims Act and applicable state false claims laws. Vendors are responsible for reviewing the False Claims Act Information section of the HNL Code of Conduct available on our website and for sharing this information with your employees conducting business with HNL.

## Compliance with Laws

Vendors are expected to conduct business in compliance with applicable laws and regulations, including laws that are applicable to individuals and entities receiving federal funds and, to the extent a vendor is a first tier, downstream, and/or related entity (FDR), laws that are applicable to FDRs. Vendors are also expected to take appropriate action against their employees and contractors who have been found to have violated the law or the Vendor's policies.

## Ineligible Persons

HNL will not conduct business with a vendor, who is excluded from or ineligible to participate in state or federal healthcare programs; suspended or debarred from federal government contracts; or has been convicted of a criminal offense related to the provision of healthcare items or services, nor will we bill for items or services rendered, ordered, or prescribed by those individuals or entities. We also will not contract with, bill for services rendered by vendor that has not been reinstated in state or federal healthcare programs after a period of exclusion, suspension, debarment or ineligibility. HNL routinely searches the Department of Health and Human Services Office of Inspector General's (OIG's), certain states', and others' lists of such excluded and ineligible persons and entities.

## Privacy and Security

Federal and state laws require HNL and our vendors to maintain the privacy and security of protected health information (PHI). Vendors are responsible for ensuring all vendor personnel who provide services to HNL are aware of and familiar with the requirements of both the Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Rules and, where

applicable, those state laws that provide more stringent protection of PHI. HNL's Third-Party Security policy prohibits the connection of USB or other storage devices to HNL assets without provision of an approved solution and explicit approval in writing by HNL Security. Vendors are responsible for ensuring all personnel who provide services to network connected devices receive role-appropriate periodic training and assessments (at least annually) on cybersecurity. In addition, the vendor is responsible to ensure all reasonable and customary industry accepted actions are taken to ensure their respective devices are protected and malware free prior to installation and or use. If a vendor's business relationship with HNL will require them to create, receive, maintain or transmit PHI, the vendor will be required to sign a Business Associate Agreement. The need to access or use PHI may also require the vendor to sign a Business Associate Agreement.

## **No Offshore Access to Personal Information**

No Personal Information may be accessed, generated, hosted, downloaded, printed, stored, processed, transferred, or maintained outside of the United States by a vendor or any sub-contractor without the prior written approval of HNL's Chief Compliance and Privacy Officer. Such approval may be withheld by HNL for any reason in its sole discretion and/or approval may be subject to additional terms and conditions.

## **Confidentiality and Intellectual Property**

In the performance of services on behalf HNL, vendors may be permitted access to confidential information. Vendors are expected to safeguard HNL's confidential employee, patient, and business information. Information may only be shared by those who need to know in the performance of duties for HNL. Vendors are expected to respect HNL's intellectual property rights and to seek clarification if questions should arise. HNL prohibits the use of its name or marks in advertising without prior written consent of HNL. HNL expects adherence to these confidentiality and intellectual property obligations beyond the end of the contract

## **Visitation**

Vendors must enter and exit through the main entrance of HNL facilities and presence must be documented via the kiosk or paper log. Upon check-in, a visitor identification badge will be generated by the kiosk or issued by HNL personnel. Badges must be displayed prominently at all times. Vendors, excluding those issued an official HNL identification badge, must be escorted at all times by an HNL employee. Vendor representatives are required to schedule appointments and must register prior to entering any HNL facility. Representatives will be required to state the individual and area to be visited and visits must be restricted to those individuals and location(s) only.

If a vendor visits an HNL client location, vendor must abide by any policies set forth by that entity which may include registration with credentialing programs such as VendorMate.

## **Duty to Report and Compliance Hotline**

Illegal acts or improper conduct may subject HNL to severe civil and criminal penalties, including large fines and being barred from certain types of business. Any vendor who becomes aware of a violation or suspected violation of any of the laws or regulations that apply to HNL's operations has a duty to report such violation or suspected violation immediately to the Compliance Department. Reporting a concern directly allows HNL's Compliance Department to obtain additional

information, if needed. However, you may choose to report through the Compliance Hotline. Reports through the Compliance Hotline may be made anonymously and without fear of retaliation.

A report of a suspected violation may be made in person, by phone, or in writing, to:

**HNL Compliance Department:** [compliance@hnl.com](mailto:compliance@hnl.com)

**EthicsPoint Compliance Hotline:** 844-675-7684  
or [www.healthnetworklabs.ethicspoint.com](http://www.healthnetworklabs.ethicspoint.com)

**All reports of suspected violations of law, this Code, HNL policies, or ethical standards will be promptly investigated. Anyone involved is expected to cooperate with these investigations. It will be considered a violation of this Code to prevent, hinder, or delay discovery and full investigation of suspected violations.**

## Enforcement

Vendor(s) who do not adhere to HNL policies will be subject to sanctions. Any violation by the vendor representative will be reviewed internally by HNL for investigation and compliance.

HNL reserves the right to take whatever action is necessary based upon the egregiousness of the conduct or behavior to resolve the issue. Action could include immediate suspension, or the imposition of a lifetime ban as well as the pursuit of civil or criminal action.

Approved by Compliance Committee: April 2020