



# Table of Content

- 3 HSS Purpose, Mission, Vision and Values
- 5 Introduction
- 5 Vendor Registration and Access Requirements  
Visitation guidelines for all Vendors accessing HSS facilities and/or networks
- 6 Confidentiality and Privacy  
Maintain confidentiality in strict accordance with legal and ethical standards
- 6 Safety, Security and Respect in Our Workplace  
Provide a safe and secure environment for patients, staff and visitors, and treat everyone with respect, dignity and courtesy
- 7 Business Ethics and Compliance with Laws and Regulations  
Conduct business ethically and honestly, acting in a manner that enhances HSS' reputation
- 7 Conflicts of Interest and Commitment  
Report interests with outside entities and manage any potential conflicts of interest or commitment arising from those interests
- 7 Vendor Offboarding  
Except in limited, approved circumstances, we will not solicit or accept any gifts or gratuities from patients, vendors, suppliers, contractors, or industry representatives
- 8 Resources

## **Our Purpose is why we exist, our Mission defines us and our Vision helps shape our future.**

### **Purpose**

To help people get back to what they need and love to do better than any other place in the world.

### **Mission**

To provide the highest quality patient care, improve mobility and enhance the quality of life for all, and to advance the science of orthopedic surgery, rheumatology and their related disciplines through research and education.

### **Vision**

To lead the world as the most innovative source of medical care, the premier research institution and the most trusted educator in the fields of orthopedics, rheumatology and their related disciplines.

## **Our Values are the fundamental beliefs that guide us in everything we do.**

### **Diversity**

We are committed to an environment of respect, equitable treatment and opportunity for our patients, employees and communities.

### **Excellence**

We set and continually raise the bar on all that we do.

### **Gratitude**

We express appreciation every day, through words and actions, for the opportunity to serve our patients, our community and each other.

### **Innovation**

We support an environment that fosters new ideas and new approaches in everything we do.

### **Integrity**

We take pride in maintaining the highest levels of personal and professional conduct.

### **Passion**

We bring energy, commitment and enthusiasm to our work every day.

### **Teamwork**

We participate fully as members of our team, respecting, supporting and empowering one another.

## A MESSAGE FROM OUR LEADERSHIP

Dear HSS Vendor,

Values, expectations and behaviors are at the core of the culture that enables HSS to be the best in the world at what we do. As a Vendor, you benefit from this culture but are also an important contributor. This Vendor Code of Conduct is not only intended to be clear and helpful but also instills in you a shared sense of purpose, responsibility and pride in the association between our organizations.

At HSS we strive to maintain the highest standards for talent and behavior, and we understand the importance of communicating and enabling positive accountability for all direct and indirect contributors to our performance. This serves to uphold and provide universal confidence in the safety, security, equity, integrity, and quality of all aspects of our enterprise.

Thank you for sharing our commitment and ensuring the same among all your colleagues who interact with HSS.



With gratitude,

A handwritten signature in black ink that reads "B Kelly".

**Bryan T. Kelly, MD**

President and Chief Executive Officer



A handwritten signature in black ink that reads "Douglas E. Padgett, MD".

**Douglas E. Padgett, MD**

Surgeon-in-Chief

## INTRODUCTION

### WHY DO WE HAVE A VENDOR CODE OF CONDUCT?

Like the HSS Code of Conduct, the HSS Vendor Code of Conduct is based on the principles outlined in our **Mission, Vision and Values Statements**, and serves at the foundation of HSS' Vendor Compliance Program. It reflects our expectations and who we are.

### DOES THE VENDOR CODE OF CONDUCT APPLY TO ME?

In addition to the HSS Code of Conduct, the HSS Vendor Code of Conduct applies to all individuals and entities providing goods or services to HSS (collectively, Vendors). The Vendor Code of Conduct applies even if a Vendor doesn't (1) interact with HSS patients, patient information, or staff; (2) visit HSS facilities or offices; or (3) have a written, executed agreement with HSS.

### WHAT'S MY RESPONSIBILITY?

Read, understand and follow this Vendor Code of Conduct, the HSS Code of Conduct and related policies. Complete all required training and comply with all requirements for access to HSS electronic systems and facilities, each and every time you require access for Vendor-related purposes.

Failure to comply with this Vendor Code of Conduct may result in disciplinary action, up to and including suspension or termination of HSS access privileges and/or termination of Vendor's business relationship with HSS.

**SPEAK UP WITHOUT FEAR OF RETALIATION.** Report actual or suspected noncompliance with the law, regulations, HSS policy, the HSS Code of Conduct, or the HSS Vendor Code of Conduct, whether the suspected noncompliance involves you or someone else who is subject to the HSS Code and/or this Vendor Code, or involves conduct that you reasonably believe poses a substantial and specific danger to public health or safety. **No concern is too minor to report.** HSS won't retaliate or tolerate retaliation against anyone who makes a "good faith" report of suspected noncompliance. Reporting in "good faith" means you are coming forward honestly with information you believe to be true.

### WHERE CAN I GO FOR HELP?

Help and guidance are always available. For questions regarding this HSS Vendor Code of Conduct, please contact the HSS Office of Corporate Compliance and Internal Audit at 212.774.2398.

**Our Confidential Helpline is ALWAYS available to you.** Call **888.651.6234** or visit **[hss.ethicspoint.com](https://hss.ethicspoint.com)** to report actual or suspected noncompliance. Reports to the Confidential Helpline cannot be traced, ensuring anonymity.

## VENDOR REGISTRATION & ACCESS REQUIREMENTS

### REGISTRATION & CREDENTIALING

Vendors must complete registration with HSS' Vendor Management System. Vendors are expected to submit all required credentials upon registration, maintain these credentials and complete HSS-provided education and training through the Vendor Management System, as required.

### ARRIVAL/CHECK-IN & CHECK-OUT PROCEDURES

Upon entry to, and exit from, any HSS facility, Vendors must check-in and check-out via the Vendor Management System. Vendors may consult the HSS Vendor Management website ([www.HSS.edu/Vendors](https://www.HSS.edu/Vendors)) for site-specific access instructions. Vendors must prominently display the Vendor Management System's identification badge during their entire visit.

### IDENTIFICATION

Vendors must prominently display the identification badge issued to them through the Vendor Management System during their entire visit at any HSS facility.

### VISITATION GUIDELINES

Vendors must comply with applicable physical access and infection control policies in effect at the time of the Vendor's visit to any HSS facility. Vendors are strictly prohibited from entering restricted areas, including patient care or HSS staff only areas, unless otherwise authorized by HSS.

## CONFIDENTIALITY & PRIVACY

### PROTECTED HEALTH INFORMATION

HSS is committed to patient privacy, and manages their information with care and in accordance with applicable legal requirements. Access to patient information is limited to HSS business-related reasons only. Unauthorized access to and/or inappropriate use or disclosure of patient information is not tolerated, and will result in disciplinary action. Any known or suspected confidentiality breaches should be immediately reported to the HSS Office of Corporate Compliance or anonymously through the HSS Confidential Helpline.

Vendors who use, access or disclose patient information on behalf of HSS, are required to agree to and comply with the terms of the standard HSS Business Associate Agreement (BAA), as governed by HSS policy. A BAA between the Vendor and HSS must be fully executed prior to the exchange of any PHI.

### INFORMATION SECURITY RISK ASSESSMENTS

Vendors that maintain HSS electronic information, or require access to, or interface with, HSS IT systems, are required to complete an HSS Information Security Risk Assessment. The Assessment confirms the existence of required IT controls and validates appropriate safeguards are in place to protect HSS electronic information and HSS IT systems. The Assessment should be performed prior to initial Vendor contract execution.

### PROPRIETARY/CONFIDENTIAL INFORMATION

Vendors must exercise care to ensure that HSS proprietary and confidential information is carefully maintained and managed. Vendors are precluded from disclosing HSS proprietary and confidential information, except as required to provide Vendor goods or services to HSS, as expressly authorized by HSS, or as otherwise required by law. If required by HSS, Vendors must agree to and comply with the terms of the standard HSS NDA.

## SAFETY, SECURITY & RESPECT IN THE WORKPLACE

### SAFETY & SECURITY

Vendors must comply with HSS Security and Safety directives, policies/procedures, and all laws, regulations and standards governing workplace safety and infection prevention.

### SAFE FAIR & RESPECTFUL WORKPLACE

At HSS, we show proper respect and consideration to one another, regardless of position, and expect the same from our Vendors. Discrimination, harassment, bullying, retaliation and any other inappropriate or abusive conduct is not tolerated. Please contact HSS Office of Corporate Compliance or the Confidential Helpline if you feel you are being harassed, bullied, or discriminated or retaliated against.

Work relationships among HSS staff and others conducting business with HSS, including Vendors, should be professional and free of harassment, discrimination, bullying or any other abusive conduct.

### DIVERSITY, EQUITY & INCLUSION

HSS is committed to promoting and supporting a diverse and inclusive culture and maintaining a positive environment where our colleagues feel valued, included, engaged and have an equitable opportunity to succeed. We expect Vendors to share our commitment.

At HSS, we are thoughtful and respectful, and do not make assumptions or treat others differently.

### ENVIRONMENTAL CONSIDERATIONS

HSS is committed to providing a safe and secure environment for patients, staff, visitors and Vendors, and complying with all laws and regulations governing hazardous materials, pollutants and infectious wastes. Any potential violation of HSS' safety policies and procedures, laws, regulations or standards should be immediately reported.

## BUSINESS ETHICS & COMPLIANCE WITH LAWS & REGULATIONS

Vendors must demonstrate honesty, integrity and fairness in the provision of goods or services to HSS.

HSS strictly prohibits the giving or receiving of any form of remuneration, including payments, kickbacks, bribes or rebates, to induce the referral or purchase of any healthcare service. HSS does not accept or offer payment, inducement, or any of form of remuneration for referrals.

Vendors are chosen objectively, and inducements or favors to influence HSS or others connected with HSS, to use particular goods or services, are strictly prohibited.

HSS is aware of situations that may present potential antitrust issues and avoids inappropriate sensitive discussions with Vendors.

Consistent with the United States Foreign Corrupt Practices Act, Vendors representing HSS are prohibited from paying, offering, promising, authorizing, taking, soliciting, or accepting for personal benefit any bribe, kickback, illicit payment, advantage or anything of value, in money or in kind, to or from any foreign official, or to or from any other person, including any representative of any actual or potential customer, partner or other counterparty.

To ensure Vendors are not excluded from participation in, or with, any Federal program, HSS partners with a third-party administrator to perform monthly sanction screening checks against Medical and Medicaid Exclusion Lists, State Excluded Parties Lists, State Debarred Lists, OFAC Specially Designated National, US Department of Commerce Bureau of Industry & Security, Federal and International Lists, State Abuse Registries, and State Disciplinary Lists. HSS will take appropriate action based on the results of monthly sanction screening checks.

HSS is a federal contractor obligated to take affirmative action to employ women, minorities, individuals with disabilities and veterans. HSS is also required to inform prospective Vendors that they, too, may have such obligations.

## CONFLICTS OF INTEREST, GIFTS & GRATUITIES

Conflicts of interest, including financial and personal interests between a Vendor and HSS, or HSS staff, must be disclosed to the HSS Office of Corporate Compliance & Internal Audit.

Vendors must not give cash, cash equivalents, or in-kind contributions in support of any HSS activity, unless approved by the HSS Office of Corporate Compliance or the HSS Education Institute.

Vendors must not offer or give cash, cash equivalents, or in-kind personal gifts to HSS staff.

## VENDOR OFFBOARDING

HSS property, including but not limited to HSS-issued badges, HSS proprietary or confidential data, HSS-owned devices and/or any other medical equipment, must be returned, either immediately, upon request by HSS, or prior to termination of the Vendor services.

HSS will perform standardized evaluations and compliance with this code, during the engagement and upon its completion. HSS will continuously evaluate Vendor services throughout the term of engagement, and upon termination of Vendor services.

### HSS VENDOR WEBPAGE

HSS maintains a public-facing webpage with additional information and resources relevant to our Vendors, including but not limited to, Vendor responsibilities, physical access protocols and restrictions and public health requirements.

[www.hss.edu/vendors](http://www.hss.edu/vendors)



### HSS VENDOR MANAGEMENT SYSTEM

All Vendors are required to register with HSS' Vendor Management System, Green Security, and maintain the required credentials, training and education for compliant business practices with HSS, and authorized access to our network and facilities.

For Green Security registration or technical support questions, please contact Green Security at 866-750-3373 or [support@greensecurityllc.com](mailto:support@greensecurityllc.com).

### HSS CODE OF CONDUCT

The HSS Code of Conduct applies to all Vendors, in addition to the HSS Vendor Code of Conduct, and is accessible online at <https://www.hss.edu/corporate-compliance.asp>.



### **If you have a question or concern, HSS offers the following resources to assist and support you:**

#### **For General Vendor Management Questions or Concerns:**

- Vendor Management Team: 646.714.6826 or [VendorManagement@hss.edu](mailto:VendorManagement@hss.edu)

#### **For Safety, Security, and Facility Questions or Concerns:**

- Engineering: 212.606.1460
- Environmental Services: 212.606.1460
- Security: 212.606.1840

#### **For Privacy and Information Security Questions or Concerns:**

- Corporate Compliance: 212.774.2398
- Confidential Helpline: 888.651.6234 or [hss.ethicspoint.com](http://hss.ethicspoint.com)

#### **For suspected violations of our Code of Conduct, HSS policy, laws, or regulations relating to HSS:**

- Corporate Compliance: 212.774.2398
- Legal Affairs: 212.606.1592

#### **For Harassment, Bullying, or Discrimination Questions or Concerns:**

- Employee Relations: 646.797.8672 or 212.774.2287
- Corporate Compliance: 212.774.2398
- Confidential Helpline: Confidential Helpline: 888.651.6234 or [hss.ethicspoint.com](http://hss.ethicspoint.com)

### **Our Confidential Helpline is ALWAYS available to you.**

Our toll-free Confidential Helpline is administered by an independent company and is available 24 hours per day, 7 days per week. Calls to the Confidential Helpline are never recorded and cannot be traced.

When you call the Confidential Helpline, a representative from the independent company will document the information you share and forward that information to HSS' Office of Corporate Compliance. Corporate Compliance will ensure individuals with appropriate expertise effectively respond to your question or concern. After reporting your question or concern, you will receive a case number and that will be your reference if you want to call the Confidential Helpline to receive a status update or provide additional information.