VENDOR CODE OF CONDUCT

Scott & White Health Plan strives to comply with all applicable laws, regulations and Scott & White Health Plan policies, and to demonstrate high ethical standards in our business practices. Our Vendors play an integral role in helping to reach these goals. We have created the Vendor Code of Conduct to communicate the minimum standards by which all Vendors are expected to conduct themselves when providing goods and services to Scott & White Health Plan. Please share this Vendor Code of Conduct with your employees.

Gifts and Business Courtesies – Scott & White Health Plan employees are not permitted to accept gifts or entertainment of any kind.

Conflicts of Interest – Conflicts of interest between a Vendor and SWHP Personnel, or the appearance thereof, should be avoided. We recognize that there are circumstances in which members of the same family or household work for Scott & White Health Plan and a Vendor. When an actual, potential, or perceived conflict of interest occurs, that conflict must be disclosed, in writing, by the Vendor to a person in authority at Scott & White Health Plan other than the person who has the relationship with the Vendor. SWHP Personnel are not permitted to work for a Vendor if Scott & White Health Plan is the client.

Compliance with Laws – Vendors are expected to conduct their business activities in compliance with applicable laws and regulations, including laws that are applicable to individuals and entities receiving federal funds. Vendors are also expected to take appropriate action against their employees who have been found to have violated the law or their own internal policies.

Privacy and Security – Federal and state laws require Scott & White Health Plan and our Vendors to maintain the privacy and security of Scott & White Health Plan member and patient information (PHI). Vendors are responsible for assuring that all Vendor employees who provide services to Scott & White Health Plan know about the requirements of both the Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Rules and, where applicable, those state laws and Scott & White Health Plan policies that provide more stringent protection of PHI. If your business relationship with Scott & White Health Plan contemplates access to or the disclosure of PHI, you may be required to sign a business associate agreement with us.

Ineligible Vendors – Scott & White Health Plan will not do business with any Vendor if it or any of its officers, directors or employees is, or becomes, excluded by, debarred from, or ineligible to participate in any federal health care program, or is convicted of a criminal offense in relation to the provision of health care. Scott & White Health Plan expects each Vendor to assume full responsibility for taking all necessary steps to assure that its employees involved in providing goods and services to Scott & White Health Plan, directly or indirectly, have not been or are not currently excluded from participation in any federal program.

Fraud, Waste and Abuse (FWA) — Scott & White Health Plan will investigate allegations of Vendor FWA, and, where appropriate, will take corrective action, including but not limited to civil or criminal action. 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. Scott & White Health Plan policy prohibits retaliation of any kind against individuals exercising their rights under the Federal False Claims Act or similar state laws.

Baylor Scott & White Code of Conduct and Compliance Hotline – The Baylor Scott & White Code of Conduct for SWHP Personnel in their daily work and is available to Vendors upon request. Vendors are expected to report any suspected wrongdoing. The Scott & White Health Plan Compliance Hotline is a convenient and anonymous way for Vendors to report suspected wrongdoing including FWA, safety concerns and compliance violations, without fear of retaliation. It is available 24 hours a day, 365 days a year. Our toll free Compliance Hotline number is 1-888484-6977. Appropriate action is taken against those found to have violated applicable law or Scott & White Health Plan policy.

Vendor Compliance Training – Scott & White Health Plan requires certain Vendors, including Vendor personnel providing services in Scott & White Health Plan facilities, to complete compliance training as required by their contract, or applicable law, or regulation. The Vendor must document that its employees and agents complete compliance training. Please refer to your Scott & White Health Plan contract manager for guidance regarding these requirements.
**Business Record Retention** – Scott & White Health Plan requires Vendors to retain and make available records related to business with Scott & White Health Plan for a minimum of 10 years in accordance with applicable law, regulation, and contract requirements.

**Publicity** – Vendors are not permitted to distribute advertising, press releases, or any other general public announcement regarding its products or services in Scott & White Health Plan facilities unless you have obtained prior written authorization from an authorized SWHP executive leader.

**Resources** – For more information on Scott & White Health Plan’s policies, contact your contract manager or visit Scott & White Health Plan’s Vendor compliance Web site at: [www.swhp.org](http://www.swhp.org).

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As used in this Vendor Code of Conduct

1 "Vendor(s)" include any contractors, manufacturers, suppliers, distributors, wholesalers, service companies, and other businesses that contract with, or seek to contract with Scott & White Health Plan to provide products and/or services to Scott & White Health Plan and/or Scott & White Health Plan members or patients. Vendor(s) does not include contractors, e.g., physicians and hospitals, who provide direct medical services.

**Updated 9/2/2014**