Supplier Code of Conduct

This Supplier Code of Conduct ("Code") applies to all external individuals, organizations, or business entities that provide, or may provide, goods, services, equipment, software, materials, technology, or other resources ("Suppliers") to Hartford HealthCare, including its subsidiaries, affiliates, hospitals, institutes, medical groups, and system support offices ("HHC"), in support of patient care, business operations, research, education, construction, or other organizational activities.

HHC is committed to the highest standards of ethical conduct, professional integrity, patient-centered decision-making, and transparency. Suppliers play a critical role in supporting healthcare delivery, research, innovation, and operational excellence. This Code establishes minimum standards Suppliers must meet to ensure that relationships with HHC are ethical, compliant, and free from actual or perceived undue influence.

The Code is not intended to cover every situation. It is an important reference tool that can help Suppliers make appropriate decisions. Additional information may be found in policies, procedures, and guidance disseminated throughout the healthcare system.

Questions and Reporting

Questions or concerns related to this Code may be directed to:

Hartford HealthCare Office of Compliance and Integrity (OCI)
Phone: (860) 972-1573
Email: compliance@hhchealth.org

Reports may be made anonymously and will be handled confidentially to the fullest extent possible.

ComplianceLine
1.855.442.6241
complianceline.hartfordhealthcare.org

Failure to comply with this Code may result in corrective action, including termination of the business relationship and pursuit of available contractual or legal remedies. HHC reserves the right to modify this Code at any time.

A. BUSINESS INTEGRITY AND ETHICS

1. Compliance with Laws and HHC Standards

Suppliers must comply with all applicable federal, state, and local laws, regulations, and industry standards, including those governing:

- Healthcare programs
- Fraud and abuse prevention
- Billing and reimbursement
- Privacy and data security
- Workplace conduct

Suppliers are expected to conduct business consistent with HHC ethical standards and policies. Where HHC standards exceed legal requirements, the higher standard applies.

Suppliers must promptly disclose any exclusion from participation in government healthcare programs.

2. Conflicts of Interest

Suppliers must avoid actual, potential, or perceived conflicts of interest involving HHC colleagues, clinicians, leadership, or governing bodies.

Suppliers must not engage in activities that could improperly influence clinical judgment, purchasing decisions, referrals, contracting decisions, or other business decisions.

Any relationship that could reasonably create the appearance of a conflict must be disclosed promptly.

3. Gifts, Entertainment, and Other Benefits

Suppliers must not offer gifts, entertainment, meals, or items of value for the purpose of influencing, or appearing to influence, business or clinical decisions.

Strictly Prohibited

• Cash or cash equivalents (including gift cards)
• Gifts, meals, or entertainment associated with audits, inspections, bidding, or contracting processes
• Bribes, kickbacks, payoffs, or improper inducements

Nominal-Value Items

The following may be accepted when permitted by HHC standards:

• Promotional items valued at less than $15 per item
• Maximum annual aggregate value of $75 per supplier
• Branded items may not be displayed on HHC premises
• Shared consumable items of nominal value (flowers, fruit, candy) may be accepted 1–2 times annually per supplier and shared by an entire department

Suppliers wishing to provide items for clinical, educational, or programmatic purposes must coordinate through HHC Philanthropy channels.

4. Business Meals

Occasional business meals may be provided only when all requirements are met:

- No more than 1–2 times annually per supplier
- Appropriate business setting
- Supplier host is present
- No "to-go" meals
- Cost does not exceed $100 per person

These limits do not apply to meals provided incidentally during bona fide educational conferences open to all attendees.

5. Entertainment and Social Activities

Suppliers may not provide:

- Sporting events
- Concerts
- Theater events
- Golf outings
- Travel
- Lodging

HHC representatives may attend only when they personally pay the full face value of attendance, unless a documented exception has received advance approval.

6. Supplier Presence and Access to HHC Facilities

Supplier representatives are prohibited from patient care areas unless:

- Presence is necessary for patient care; and
- Appropriate clinical approval has been obtained

Use of HHC facilities for supplier training or observation requires advance approval.

Suppliers may not compensate HHC personnel for services performed at HHC facilities or for observation/shadowing activities.

Supplier representatives entering facilities must maintain current credentialing through Reptrax or another HHC-approved platform.

Required documentation may include:

- Tuberculosis screening
- Influenza vaccination or exemption
- COVID-19 requirements, when applicable
- Background screening
- Confidentiality acknowledgments
- HHC-required training

HHC may modify credentialing requirements from time to time, and Suppliers are responsible for maintaining compliance.

HHC staff, facilities, equipment, supplies, and resources may not be used for Supplier purposes without prior written approval.

7. Education and Training Support

Supplier-supported education must serve a legitimate educational purpose and may not be promotional.

Requirements include:

• Healthcare programs • Fraud and abuse prevention • Billing and reimbursement • HHC control of agendas, speakers, and content • No supplier-prepared presentations	• Privacy and data security • Workplace conduct • Support provided to an HHC entity rather than individuals • Exhibits and promotional materials located outside presentation areas

External supplier-sponsored educational events may be attended no more than 1–2 times annually and require advance approval.

Travel and lodging expenses must be paid by HHC unless an executive-level exception is approved.

8. Supplier Interactions with HHC Colleagues

Suppliers must not engage HHC colleagues in promotional or endorsement-related activities without prior HHC approval, including:

- Testimonials
- References
- Case studies
- Advertisements
- Product endorsements

All interactions must remain professional, appropriate, and compliant with applicable laws and policies.

9. Subcontracting

Where subcontracting is permitted, Suppliers remain responsible for ensuring subcontractor compliance with this Code.

Suppliers may not retain subcontractors who fail to meet these requirements.

10. Confidential Information

Suppliers must safeguard HHC confidential, proprietary, and sensitive information, including Protected Health Information (PHI).

Such information may only be used for authorized business purposes.

Unauthorized access, disclosure, or misuse is prohibited.

11. Information Privacy and Security

Suppliers must implement appropriate safeguards to protect:

- Personal information
- Employee information
- Business data
- Protected Health Information (PHI)

Any actual or suspected breach involving HHC information must be reported immediately.

12. Fair Dealing and Competition

Suppliers must conduct business honestly, fairly, and in good faith while complying with applicable antitrust and competition laws.

B. LABOR, HEALTH, AND SAFETY

Suppliers must:

- Prohibit forced or involuntary labor
- Prohibit child labor
- Comply with minimum-age requirements
- Pay required wages and overtime
- Respect lawful freedom of association
- Maintain workplaces free from discrimination, harassment, and abuse
- Provide safe and healthy working conditions

C. ENVIRONMENTAL RESPONSIBILITY

Suppliers must comply with applicable environmental laws and regulations and responsibly manage:

- Waste
- Hazardous materials
- Energy consumption
- Natural resources

All required environmental permits and approvals must be maintained.

D. MONITORING AND ENFORCEMENT

1. Monitoring and Audits

HHC may conduct audits or inspections directly or through designated third parties.

Suppliers must maintain appropriate records and cooperate fully with audit activities.

2. Management Systems

Suppliers must maintain effective internal controls designed to ensure compliance with this Code.

Suppliers must promptly:

- Notify HHC of known violations
- Investigate concerns
- Implement corrective action plans

3. Whistleblower Protection and Non-Retaliation

Suppliers must prohibit retaliation against individuals who report concerns in good faith.

Suppliers should maintain reporting mechanisms that allow anonymous reporting whenever possible.

ACKNOWLEDGMENT

By engaging with Hartford HealthCare, Suppliers acknowledge that they have reviewed, understood, and agree to abide by this Supplier Code of Conduct and all related policies and standards.

Effective: October 1, 2026
Approved by: Office of Compliance and Integrity
Contact: compliance@hhchealth.org | (860) 972-1573