



August 1, 2013

Dear Business Partners,

Medical Center Health System (MCHS) has undertaken an integrity program called a compliance program, in order to continue the Health System's commitment to a high standard of conduct, honesty and reliability in its business practices and to advance and maintain compliance with federal and state laws and regulations applicable to health care programs. You are a vendor or provider of goods and/or services to MCHS. You are, therefore, expected to honor our commitment in your dealings with the Health System. The following requirements in our compliance program may be of particular interest.

1. **Conflict of Interest.** In order to perform their duties with honesty and fairness and in the best interest of MCHS, our employees must avoid conflicts of interest in their employment. Conflicts of interest may arise from having a position or interest in or furnishing managerial or consultative services to any concern or business from which the Health System obtains goods or services or with which it competes or does business, and from soliciting or accepting gifts, excessive entertainment or gratuities from any person or entity that does, or is seeking to do, business with the Health System. As a vendor you should, therefore, not retain any of our employees to either assist you in your business or pay any of our employees for any services furnished to your business. You should not offer or give any of our employees any gift, favors, gratuities, or excessive entertainment. This, however, does not prohibit offering or giving items of nominal or minor value (a) that are clearly tokens of respect or friendship and not related to any particular transaction or activity of MCHS, or (b) which do not go beyond the common courtesies usually associated with accepted business practices, such as baseball caps and the exchange of

lunch or dinner meetings which occur as a normal part of a healthy business relationship.

2. **Charities.** Medical Center Health System is involved with and supports several charities. You are not required or expected to contribute to any such charity as part of or as a condition of doing business with the Health System. It is not proper for any of our employees to suggest otherwise. Of course, you may support any charity you wish regardless of its relationship with MCHS but that must be entirely voluntary with you.

3. **Fraud and Abuse.** MCHS employees are required to refrain from conduct that may violate fraud and abuse laws. Among other things, these laws prohibit direct, indirect or disguised payments in exchange for referral of patients. You will, therefore, not receive any inducements from the Health System for referring patients to this facility. You are not required or expected to refer patients to MCHS as part of or as a condition of doing business with MCHS.

4. **Financial Inducements.** No Medical Center Health System employee should offer or accept any financial inducement, gift, payoff, kickback, or bribe intended to induce, influence or reward favorable decisions of or terms from any contractor or vendor in a commercial or business transaction or any person in a position to benefit Medical Center Health System or the employee in any way. Employees must act honestly and with integrity in their business dealings with our contractors and vendors. We know this is what you expect and that you will act likewise in your dealings and transactions with the Health System.

5. **Rebates.** Appropriate rebates, discounts and allowances are customary and acceptable business practices provided that they do not constitute illegal or unethical payments. Any such rebate, discount or allowance given or made to MCHS must have a reasonable business or commercial basis and should be competitively justified. Payments shall be made to Medical Center Health System and not to any employee of the Health System.

6. **Screening.** MCHS will conduct reasonable background investigations for vendors and contractors to determine if any such vendor or contractor has a criminal conviction related to health care or has been disbarred or excluded by a federal agency. The Health System will not contract with any

person or entity that has been so convicted or excluded or debarred and will attempt to terminate its contract arrangements with any such person or entity.

7. **False Claims.** The Board of Directors and administrative staff of the Ector County Hospital District and Medical Center Health System require strict compliance with all laws related to providing hospital-related healthcare services and accurately billing for those services. A number of federal and state laws prohibit the submission of “false” or “fraudulent” claims to public healthcare programs funded by taxpayer dollars such as the Medicare and Medicaid programs. Federal and state laws also contain “whistleblower” protection that precludes employers such as MCHS from retaliating against a person who reports false claims or fraudulent billing. As a Business Partner, you should be aware of the following laws specifically prohibiting fraud and abuse by healthcare providers who expect to be reimbursed for their services by the federal or state government. You, as a Business Partner, will have access to training materials related to the provisions of the False Claims Act and policies and procedures will be made readily available in either electronic or paper form upon request. You are encouraged to request this material by contacting the Compliance Office at (432) 640-1067 or visit www.medicalcenterhealthsystem.com and view the policies and procedures that have been posted for your information and education under the “Vendors & Company Representatives” link.

8. **Compliance Officer.** Center Health System has a compliance officer who oversees and monitors the compliance program. If you have any questions about the program as it may affect you, please feel free to call the officer through the switchboard at (432) 640-4000 or call the officer directly at (432) 640-1106. If you feel that employees of Medical Center Health System have been less than completely honest in their dealings with you or in suggestions made to you, then please advise the compliance officer. If you prefer, you may call our “ComplianceLine” at 1-800-805-1642 and leave an anonymous message.

We want you to be comfortable in your dealings with Medical Center Health System. We want all vendors to know that each of you have been treated with honesty and fairness. We, of course, expect to be treated the same. These goals and standards will be fostered and preserved with your cooperation and your observance of, what we believe, are simple and proper business ethics.

Yours truly,

William Webster
Chief Executive Office



Date: _____

Chief Compliance Officer
Compliance Department
Medical Center Health System
P. O. Box 7239
Odessa, Texas 79760

This signed document is to confirm receipt of Medical Center Health System’s notification of their Integrity Program. _____ is committed to maintaining our good relationship with MCHS by adhering to the standards outlined in this document. We understand that violation of these standards can result in possible termination of the business relationship we currently enjoy. Please sign, date and return this page only, in the envelope provided as soon as possible.

Company Representative

Date

Name of Company