



Vendor Code of Conduct

Brightspire has an unwavering commitment to excellence in all that we do. At the heart of that commitment lies a core of ethical and sound business conduct. It is a commitment that we have of not only ourselves, but those we have established business relationships with. Our Vendors play an essential role in the delivery of innovative, first-class care to those who have entrusted us to meet their needs. With this in mind, we have created a Vendor Code of Conduct that provides an overview of minimum standards we expect our Vendors to hold themselves to when providing goods, services, and care to those within our organization.

Compliance with Laws – Vendors are required to conduct their business activities in compliance with all applicable laws and regulations, including laws that are applicable to individuals and entities receiving Medicare, Medicaid and other federal funds. Any employee of a vendor found to be in violation of these laws, regulations, or codes should be disciplined according to the vendor’s policies.

Fraud, Waste, and Abuse (FWA) –Brightspire is committed to preventing, detecting, and correcting, fraud, waste and abuse. We have significant legal and ethical responsibilities related to FWA. Brightspire will promptly investigate any allegations of FWA. Vendors are expected to fully cooperate in such investigations and take appropriate action where appropriate if allegations are substantiated.

Conflicts of Interest – Conflicts of interest between a Vendor and Brightspire employees, or the appearance thereof should be avoided. When an actual, potential, or perceived conflict of interest occurs, the conflict must be disclosed, in writing, by the Vendor to the Compliance Officer at Brightspire. We expect our suppliers to bring any actual, potential, or perceived conflicts of interest to the attention of a Brightspire high-level representative (other than the person who has a relationship with the supplier) in a timely manner.

Ineligible Vendors - Brightspire does not employ, contract with, grant privileges to, or enter into any type of arrangement with individuals, entities or vendors if it or any of its officers, directors, or employees are currently excluded by the Office of the Inspector General (OIG) or debarred by the General Services Administration (GSA) from participating in federal programs, including Medicare or Medicaid or is convicted of a criminal offense related to the provision of healthcare. Brightspire expects each Vendor to assume full responsibility for taking all necessary steps to assure that its employees involved in providing goods and services to Brightspire, directly or indirectly, have not been or are not currently excluded from participation in any federal program.

Gifts & Business Courtesies Vendors are discouraged from giving gifts to Brightspire employees. Vendors should not offer anything of value to obtain or retain a benefit or advantage for the giver, and not offer anything that might appear to influence, compromise judgment, or obligate any Brightspire employee. The following items are never acceptable:

- Gifts given to Brightspire’s employees for the purpose of influencing a purchasing and contracting decision;
- Gifts that reasonably could be perceived as a bribe, payoff, deal, or any other attempt to gain a competitive advantage;
- Cash or items redeemable for cash such as checks, gift cards, stocks, etc.;
- Gifts to or from government representatives;
- Gifts or other incentives given for the purpose of encouraging or rewarding patient referrals;
- Gifts that may violate a law or regulation

Fundraising – As a non-profit charitable organization, Brightspire may solicit charitable contributions to support our foundation. Only Brightspire individuals responsible for legitimate fund-raising activities are allowed to solicit these charitable contributions. No one responsible for the selection and negotiation of vendors or suppliers is allowed to solicit on behalf of the Brightspire Foundation.

Compliance Training - All Vendors are required to educate and train their employees to ensure that they understand and comply with the Brightspire Vendor Code of Conduct. Vendors are expected to self-monitor their compliance with this Vendor Code of Conduct.

Accurate Record Keeping & Billing – All business and clinical records must be created professionally, honestly, accurately and complete. Vendors are expected to follow all federal and state rules regarding the creation, maintenance, and destruction of records. Each Vendor of Brightspire is responsible for retaining and making available records related to business and clinical activities with Brightspire in accordance with applicable law, regulation, contract requirements and Brightspire policy.

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

Non-Discrimination – Brightspire requires all vendors to maintain non-discrimination policies and procedures. A vendor shall provide a workplace free of harassment and discrimination. No Vendor should engage in discrimination based on race, color, creed, religion, ethnic or national origin, sex, gender identity, age, disability, physical attributes, sexual orientation, marital status, citizenship status, military or veteran status, political affiliation, or any other characteristic protected by applicable law, in hiring or other employment practices.

Business Continuity – Subject to the terms of any specific contractual provisions that apply, each vendor is required to have adequate business continuity plans in place to continue to provide its services to a reasonable degree in the aftermath of an operational interruption, whether caused by a natural disaster, equipment malfunction, power failure, communications and/or data network failure or disruption, terrorist act, cyber-attack, or other such exigency. Each vendor shall, upon request, disclose to Brightspire in reasonable detail the elements of its business continuity plans and its information security systems and controls.

Code of Conduct and Compliance Line – The Code of Conduct for Brightspire is available to Vendors upon request. Vendors are expected to report any concerns or suspected violations of the Code of Conduct, policies, and laws to the Compliance Officer. The Compliance Officer may be reached by dialing the integrity hotline at (336)-886-6553 x 5116, by email at compliance@brightspire.org or by mail at: Attn: Compliance Director, 2109 Sandy Ridge Road, Colfax, NC 27235.