



Appendix C: Vendor Code of Conduct

Navitus Health Solutions is committed to full compliance with all applicable laws, regulations and contract requirements. In addition, we hold ourselves to the highest ethical standards on behalf of our clients and members. To help ensure we maintain our compliance and ethical standards, we work closely with our vendors and business partners.

Our vendors and business partners are important to our success and play a critical role in servicing our members, whether directly or indirectly. This Vendor Code of Conduct (Code) is provided to you as an easy way to communicate our expectations as your company fulfills the terms of the contract. This Code is a guide and does not include all possible activities. Please share with your employees and contact us if you have a question about an activity not included in this Code.

A print ready version of the Navitus Code of Conduct can be found on the Navitus website at www.navitus.com and clicking on the Vendor/FDR link at the bottom of the page.

Gifts and Business Gratuities

Navitus discourages you from providing any gifts, meals, entertainment or other business gratuities to Navitus employees, consultants or pharmacists. While we appreciate the occasional pen with your business name, items such as the following are not appropriate:

- Gifts or entertainment of any kind to any Navitus staff during the selection, negotiation or purchasing stages of a contractual arrangement.
- Gifts or entertainment that could be perceived as a bribe, payoff or advantage.
- Cash or cash-equivalents, such as checks, gift certificates/cards or stock.
- Gifts or entertainment that violate the law.

Conflicts of Interest

Conflicts of interest between a vendor and Navitus staff (or the appearance of a conflict) should be avoided. When an actual, potential or perceived conflict of interest occurs, that conflict must be disclosed, in writing to the Navitus employee who has the relationship with the vendor.

While Navitus employees may occasionally have secondary employment, no staff member may work for a vendor that has a contractual relationship with Navitus.

No Navitus employee may participate on the board of a vendor with whom Navitus does business.

Compliance with Laws

Vendors are expected to conduct their business activities in compliance with all applicable laws and regulations, including Medicare and Medicaid. Vendors are also expected to take appropriate action against any of its employees or subcontractors that have violated such laws.



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Privacy and Security

Many State and Federal privacy laws, such as the requirements of the Health Insurance Portability and Accountability Act (HIPAA) require Navitus and our vendors to maintain the privacy and security of patient information (PHI). If a vendor will have access to Navitus member PHI, the vendor is responsible for ensuring that all employees who provide services to Navitus are trained on HIPAA Privacy and Security Rules, and is expected to provide an annual attestation that such training has been completed. In addition, if vendor uses or discloses PHI on behalf of Navitus, the vendor will be expected to enter into a Business Associate Agreement.

Ineligible Persons and Vendors

Navitus will not do business with any vendor if it is, or any of its officers, directors or employees are excluded, debarred or ineligible to participate in any Federal health care program. To ensure no exclusion exists, Navitus vendors are expected to screen all employees, officers and directors against two Federal exclusion lists before hire or engagement and on a monthly basis thereafter. These lists are the U.S. Department of Health and Human Services, Office of Inspector General List of Excluded Individuals and Entities (LEIE) and the General Services Administration's Excluded Parties List Service (EPLS). Vendors are expected to provide an annual attestation that such exclusion screening has occurred.

Fraud, Waste and Abuse (FWA)

Navitus will investigate all allegations of FWA and, where appropriate, will take corrective action, including civil or criminal action. Vendors are expected to report any suspected acts of FWA regardless of the source or possible participants. Navitus has several methods for reporting including via confidential, toll-free hotline, email, or mail. All good-faith reporting is protected by the Navitus Non-Retaliation Policy. Our toll free Compliance Hotline number is **1-855-673-6503**.

Vendor Compliance Training

Navitus requires all vendors, including vendor employees, to participate in and complete general compliance and FWA training. The vendor must document and provide an annual attestation that training has been completed. Training can be completed using the CMS free training modules located on the CMS MLN website. In addition to compliance and FWA training, Business Associates and their employees must also complete annual HIPAA training. This HIPAA training can be completed using the vendor's training or by requesting a copy of the Navitus HIPAA training.

Business Record Retention

Navitus requires vendors to retain all records related to services provided to Navitus for ten (10) years. These records must be made available to Navitus or a government auditor in accordance with applicable laws, regulations and contract terms.