

## Oversight of vendors

If your organization chooses to subcontract with other individuals/parties to provide healthcare services or certain administrative services in connection with your Encompass Health contract, you are responsible for ensuring these entities abide by the standards set forth in the vendor code of conduct. You must conduct appropriate oversight of the entities to ensure compliance with applicable laws and regulations including routine monitoring and auditing to identify compliance risks. You must also develop and implement procedures to promptly respond to suspected and identified issues. You should track and document these efforts, including any actions taken to resolve identified issues.

## Resources

### Ethics & compliance department

205.970.5900

### HIPAA privacy office

205.969.6882

### Compliance Hotline

888.800.2577

### Vendor compliance website

[www.encompasshealth.com/vendorcompliance](http://www.encompasshealth.com/vendorcompliance)

### Supply chain operations

800.765.4772

## Our purpose

We believe integrated care delivery across the healthcare continuum is critical to achieving the best outcomes for patients. We exist to provide a better way to care that elevates expectations and outcomes.

## Our values

**SET THE STANDARD** We are committed to going above and beyond, never settling for anything less than excellence. We pride ourselves on being industry leaders and challenge ourselves to continuously improve.

**LEAD WITH EMPATHY** We start with empathy, taking the time to understand the physical, mental and emotional needs of each other and those we support. We listen, make deep connections and engage on a personal level to better serve those we support.

**DO WHAT'S RIGHT** We do the right thing the right way, no matter how difficult, even when no one is looking. We're not afraid to have hard conversations. If we make a mistake, we acknowledge it, proactively find a resolution and make it right going forward.

**FOCUS ON THE POSITIVE** We have a positive spirit and find the light even in the most difficult situations. We bring our whole self to work. We celebrate successes and inspire others to create meaningful impact.

**STRONGER TOGETHER** We believe our individual strengths make us stronger together. We take accountability for our actions, connect across teams and lean in to get it done – at all levels of the Company.



# Vendor code of conduct



## Vendor code of conduct

### Do what's right

Encompass Health is committed to conducting business in compliance with all applicable federal, state and local laws and regulations, and to acting at all times in conformance with the highest standards of business conduct. We have created this compliance guidance for vendors to help us accomplish these objectives by establishing a general framework for acting with honesty, openness, and integrity in accordance with a shared set of principles. For more detailed guidance, visit [encompasshealth.com/vendorcompliance](https://encompasshealth.com/vendorcompliance).

### Ethics & compliance department

Questions or concerns relating to suspected compliance violations should be brought to the attention of Encompass Health's ethics & compliance department by phone at 205.970.5900 or by email at [compliancehomeoffice@encompasshealth.com](mailto:compliancehomeoffice@encompasshealth.com). Reports made directly to the Encompass Health's ethics & compliance department are confidential, and anyone who, in good faith, reports known or suspected incidents of noncompliance will not be subject to retaliation. All credible reports of noncompliance will be investigated.

### Compliance hotline

You may also report suspected compliance violations anonymously, confidentially and without fear of retaliation via the toll-free Encompass Health Compliance Hotline at 888.800.2577 or online at [encompasshealth.mycompliance.com](https://encompasshealth.mycompliance.com). The Encompass Health Compliance Hotline operates 24 hours a day, seven days a week. The Compliance Hotline has access to interpreters of numerous foreign languages as well.

Encompass Health will not retaliate against anyone who, in good faith, reports a compliance or financial integrity concern. We require vendors to adopt a comparable non-retaliation policy for reports about potential noncompliance it receives directly.

## Compliance guidance for vendors

The information provided in the vendor code of conduct applies to all vendors that conduct business with Encompass Health.

We ask that you familiarize yourself and your employees with the vendor code of conduct and follow it in your work with Encompass Health. No single document can address every issue that may arise in the course of business; therefore, should you have questions or need additional information, you should consult one of the resources provided in this pamphlet.

### Compliance with laws

You are expected to know and follow the laws and regulations that apply to your organization. Encompass Health expects all vendors to promptly investigate all reports of suspected violations of applicable laws and regulations, and to take reasonable steps to prevent, or promptly report and correct violations.

### Gifts and business courtesies

Encompass Health discourages you and your employees from providing gifts, meals, entertainment or other business courtesies to our employees or patients in order to avoid actual or perceived impropriety, conflicts of interest, or the perception that the quality of care furnished is dependent on the offering of gifts or other gratuities.

### Visitation and marketing activities

Vendor representatives are required to schedule appointments and must register prior to visiting Encompass Health. Vendors should not disrupt workflow, and should not distribute advertisements or information on your products or services unless such items are approved by Encompass Health prior to distribution. Generally, only materials that educate patients concerning their health will be permitted.

## Conflicts of interest

Conflicts of interest between vendors and Encompass Health employees, or the appearance thereof, should be avoided. Your organization is responsible for implementing processes and procedures to review and disclose potential conflicts of interest. When an actual conflict of interest arises, that conflict must be disclosed to Encompass Health's ethics & compliance department for further review.

## Excluded providers

Medicare payment may not be made for items or services furnished or prescribed by an excluded provider or entity. You are expected to review the DHHS OIG List of Excluded Individuals and Entities (LEIE list), the GSA Excluded Parties Lists System (EPLS), and applicable state exclusion lists prior to the hiring or contracting of any new employee (including temporary employees and volunteers), subcontractors or vendors, and monthly thereafter, to ensure that none of these persons or entities are excluded or become excluded from participation in federal programs. Proof of verification should be maintained for 10 years in accordance with CMS records retention requirements.

## Compliance training

Vendors are encouraged to provide their employees with general compliance and fraud, waste and abuse training at hire and at least annually. The training content should be tailored to the organization's operations, resources and compliance risks.

## Offshore operations

You may not engage in offshore operations involving the receipt, processing, transferring, handling, storing or access of PHI related to your Encompass Health contract without the express written consent of an authorized Encompass Health representative in advance of the use of such offshore operations.