

Appendix I

MAYO STANDARDS AND CODE OF CONDUCT FOR HEALTHCARE INDUSTRY AND SUPPLIER/SALES REPRESENTATIVES

Mayo Clinic's code of conduct, integrity and compliance program, and associated policies specifically prohibit Mayo Clinic employees, including physicians, from accepting gifts from suppliers, the following is an excerpt from the Mayo Clinic Code of Conduct and Integrity Program:

Gifts or Gratuities from Businesses

Personal gifts of any kind are not acceptable under any circumstances. Suppliers, other companies, or individuals conducting business with Mayo, or wishing to conduct business with Mayo, may not give gifts of money, food, entertainment, tickets, travel, ... gift certificates, coupons, vouchers, textbooks, medical equipment such as stethoscopes, etc.

It is considered a privilege for a Supplier/Sales Representative (Representative) to have access to Mayo Clinic and Mayo Clinic Health System (Mayo Clinic) staff and resources. This privilege may be revoked at any time at the sole discretion of Mayo Clinic.

Mayo Clinic staff, business partners, and their representatives are responsible for familiarizing themselves with the Mayo Clinic Code of Conduct and Integrity Program and adhering to the standards and rules of ethical business conduct. Mayo expects a shared commitment from suppliers to work with integrity and professionalism.

Failure to comply with the rules listed in the Code of Conduct will result in disciplinary action as determined by Mayo Clinic Supply Chain Management. Individual departments may have additional requirements. Representatives should verify department-specific requirements with their Mayo Clinic host before arriving on campus.

Representatives will comply with federal, state, and local laws as a basis of all business interactions.

Rules for Healthcare Industry Representatives on Mayo Clinic Property

- **Respect and maintain the confidentiality** of patient medical or demographic information. Unauthorized access to and/or inappropriate use of patient information is strictly forbidden and will result in revocation of supplier access and privileges. Patient information may only be accessed by authorized Mayo Clinic personnel.
- **Schedule an appointment** before coming on campus, and visit only those Mayo employees with whom an appointment has been made. Representatives may not enter any patient care or administrative areas without a scheduled appointment. Hours for appointments are consistent with the normal hours of operation for Mayo Clinic unless otherwise requested by a department or employee.
- **Register** in the online supplier credentialing management system and become compliant with Mayo Clinic policies before arriving on campus.
- **Upon arrival, check in** to record the visit and print a badge as appropriate. Representatives must wear an identification badge on the upper third of their torso, displaying their name and the name of the company represented for the entire visit.

- **Do not enter patient care areas unless authorized** by Mayo clinical staff and accompanied by said clinical staff. The clinical staff member is responsible for providing oversight of the Representative during the visit.
- **Understand and follow guidelines of the National Patient Safety Goals.** It is the expectation of all HCIR's to familiarize themselves with relevant National Patient Safety Goals based on the level of interaction with Mayo's patient population. This expectation would include, but is not limited to, a clear understanding of appropriate hand hygiene and universal precautions.
- **Do not bring into a procedural area, operating room, or patient care area any device that has the capability to record or transmit audio and/or take photographic images.** Individual departments may have additional restrictions.
- **Wear business attire** while conducting visits. Representatives may not wear any medically-related clothing or uniforms (e.g., scrubs, lab coats, etc.) unless the clothing has been provided by Mayo Clinic for the visit.
- **Do not use**
 - Mayo Clinic computers, telephones, fax machines, pagers, bulletin boards, or any other Mayo Clinic property or communication system, without direct permission and supervision from a Mayo Clinic physician/employee.
 - Mayo Clinic documents and promotional materials.
 - Employee shuttles, staff elevators, staff corridors, or other Staff Only areas unless accompanied by a Mayo Clinic staff member.
- **Do not give promotional or marketing items,** food, beverages, gifts, product samples, discount coupons, claim cards, vouchers, books, or free goods to any Mayo Clinic physician, patient or employee, unless representing a non-profit organization. Educational literature pertaining to the product or service offered may be left with Mayo Clinic staff.
- **Do not bring or serve alcoholic beverages onto Mayo property.** Bringing or serving alcoholic beverages on a Mayo campus is strictly prohibited.
- **Present all new products and technological improvements to Supply Chain Management before presenting them to other Mayo Clinic physicians/employees.** Representatives are required to obtain a purchase order for all goods and services prior to delivery including equipment and product trials.
- **Obtain a purchase order for any equipment that enters the institution for product trial.** This allows for tracking and return to your company in a timely manner. Safe Harbor, Anti-Kickback, and Sunshine Acts compliance are paramount to Mayo Clinic. Therefore, all purchasing transactions are to be buy-sell in nature without side benefits or a quid-pro-quo.
- **Do not counter-detail** products that are not on contract with Mayo Clinic unless Supply Chain Management has been advised of the new technology or change in product use as approved by the FDA for the patient care setting, or unless the clinician has expressly requested a discussion regarding the new technology. It is not the intent of these guidelines to limit or be a barrier to true innovation.
- **Disclose any apparent or perceived conflict of interest** in your business relationship with Mayo to all involved Mayo employees, explaining the influence the potential conflict may have on the product or service selection process. Specifically, any family, personal, or financial relationships that may exist between the Representative and Mayo or its employees should be disclosed.