



Third-Party Code of Conduct





WE ARE METROHEALTH

- ▶ A MESSAGE FROM SUPPLY CHAIN AND COMPLIANCE
- ▶ OUR MANIFESTO
- ▶ OUR MISSION, VISION, AND VALUES
- ▶ PRINCIPLES OF OUR THIRD-PARTY CODE



WE ARE BUSINESS PARTNERS

- ▶ DOING BUSINESS WITH METROHEALTH
- ▶ THIRD-PARTY REGISTRATION, IDENTIFICATION, AND TERMINATION
- ▶ PROTECTING COMPANY CONFIDENTIAL INFORMATION AND TRADE SECRETS
- ▶ FINANCIAL INTEGRITY AND ACCURATE RECORDKEEPING
- ▶ EMERGENCY PREPAREDNESS
- ▶ RIGHT TO AUDIT



WE PROMOTE A CULTURE OF ETHICS AND COMPLIANCE

- ▶ COMMITMENT TO AN ETHICAL CULTURE
- ▶ COMPLIANCE WITH THE THIRD-PARTY CODE
- ▶ COMPLIANCE WITH LAWS
- ▶ INELIGIBLE THIRD PARTIES
- ▶ CONFLICTS OF INTEREST
- ▶ BRIBERY AND CORRUPTION
- ▶ BUSINESS COURTESIES AND GIFTS
- ▶ REPORTING CONCERNS



WE PROTECT PATIENTS AND THEIR DATA

- ▶ BUSINESS ASSOCIATES
- ▶ PHOTOGRAPHY AND AUDIO RECORDING
- ▶ VISITATION AND CLINICAL INTERACTION
- ▶ VACCINATION PROGRAM



WE RESPECT EACH OTHER

- ▶ EQUITY, INCLUSION, AND DIVERSITY
- ▶ WORKPLACE HEALTH AND SAFETY
- ▶ PROFESSIONAL CONDUCT
- ▶ DRUG-FREE WORKPLACE
- ▶ FORCED LABOR AND HUMAN RIGHTS



WE ARE COMMUNITY MEMBERS

- ▶ SUPPLIER DIVERSITY
- ▶ SUSTAINABILITY AND CORPORATE SOCIAL RESPONSIBILITY



The Glick Center

Third-Party Code of Conduct (Third-Party Code)

The Third-Party Code represents our expectations of business partners and vendors/suppliers, including their subcontractors or suppliers (third parties), when doing business with MetroHealth. Our Third-Party Code aligns with the [MetroHealth Code of Conduct – This Is Who We Are](#), which is our Culture of Ethics, and we ask our third parties to share in our commitment to a culture of ethics.

WE ARE METROHEALTH

[Index](#) [Contacts](#) [Back](#) [Next](#)

Key Definitions:

Business partner: Typically, a company or organization (for example, a group purchasing organization) with whom MetroHealth does a significant amount of business and is integral to our operations.

Supplier/vendor: A general term to refer to providers of goods or services.

Third party: A general term to refer to business partners, suppliers, and vendors.

A Message from Supply Chain and Compliance

MetroHealth leaders inspire us to commit to a culture of ethics and share that commitment with our third parties.

[READ THE LETTER](#)

Our Manifesto

Together, we are more than medicine.

[READ OUR MANIFESTO](#)

Our Mission, Vision, and Values

We, as employees, colleagues, and community members, inspire the MetroHealth Mission, Vision, and Values.

[READ OUR MISSION, VISION, AND VALUES](#)

Principles of Our Third-Party Code

Review the principles of our Third-Party Code.

[READ THE PRINCIPLES OF OUR THIRD-PARTY CODE](#)

A Message from Supply Chain and Compliance

The MetroHealth System (MetroHealth) cannot achieve its mission of “leading the way to a healthier you and a healthier community” without the dedication, commitment, and integrity of our employees and third parties. To ensure the long-term success of our company and its stakeholders, The MetroHealth Third-Party Code outlines our expectations for third parties to uphold our ethical values and principles to serve our patients and our community.

We encourage our third parties to review this document carefully and use it as a resource for guiding decisions and interactions with MetroHealth.

We base the strength of MetroHealth’s reputation not only on our own conduct, but also on the actions of our third parties. We aspire to work with third parties who share our values and reflect our same high ethical standards. We believe MetroHealth’s strong commitment to ethics and compliance, along with our third parties’ support of our Third-Party Code, will ensure that MetroHealth continues to be a source of pride for us and our community. Thank you for embracing a commitment to comply with the expectations outlined in this Third-Party Code of Conduct.

Justin Gallo
Vice President, Supply Chain

Robin Barre
Director, Compliance

MetroHealth reserves the right to revise this Third-Party Code at any time. If an inconsistency arises between this Third-Party Code and the provisions of any written agreement between MetroHealth and the third party, the terms and conditions of the written agreement prevail, except to the extent they are contrary to law.



(Photography provided by © Nic Lehoux)

WE ARE METROHEALTH



Our Manifesto

Together, we are more than medicine.

We are the guardians of those who need care the most.

We deliver state-of-the-art care through deliberate focus on every person's needs.

While our goals are audacious, we are relentless in our pursuit of health for every person. In our fight for equity, inclusion, and diversity, we are inspired to eliminate barriers that impact health.

Because we are intentional about serving our community, we walk alongside every person at every step of their journey to health. That's a promise that extends beyond our hospital walls.

We are devoted to hope, health, and humanity.

We are more than medicine. We are hope.

We are MetroHealth.

WE ARE METROHEALTH

Our Mission, Vision, And Values

Our Mission

Leading the way to a healthier you and a healthier community through service, teaching, discovery, and teamwork.

Our Vision

MetroHealth will be the most admired public health system in the nation, renowned for our innovation, outcomes, service, and financial strength.

Our Values

Service to Others

We strive to meet the needs of our patients first, by serving with compassion and advocating for the well-being of the community, especially those without the ability to pay.

Teamwork

We establish an environment of trust and engagement that focuses on the needs of the organization in order to leverage our collective strengths to do the right thing for our patients and colleagues.

Accountability

We accept responsibility for the decisions we make, the outcomes achieved, and our personal behavior.

Respect

We treat everyone equally with dignity, candor, compassion, and empathy.

Inclusion and Diversity

We foster a community where our differences are celebrated and everyone has an opportunity to be part of our success.

Quest for Excellence

We exemplify the highest standards of patient-centered care and continue to improve through discovery and innovation.

WE ARE METROHEALTH





Principles of Our Third-Party Code

Upholding the Law

1. We follow the highest standards of ethics and compliance in everything we do.
2. We protect privacy and only access, use, or disclose confidential information (including patient information) for appropriate business reasons.
3. We speak up when we suspect violations of laws, policies, and procedures, including our Third-Party Code, and ask questions about doing the right thing.
4. We support those who raise concerns and never tolerate retaliation.
5. We identify and report conflicts of interest – avoid them when we can and manage them when they are unavoidable.

Devoted to Hope. Health. Humanity.

1. We stay true to who we are: our Mission, Vision, and Values.
2. We treat everyone fairly and honestly: our patients, colleagues, and third parties.
3. We promote a psychologically safe environment where everyone's contribution is valued and respected.
4. We work to achieve health equity for our patients, and equity, inclusion, and diversity for our third parties, colleagues, and community.
5. Our third parties uphold our high standards and expect the same from their third parties.

WE ARE METROHEALTH



We recognize the integral role our business partnerships play in the success of our Mission, Vision, and Values. We maintain strong connections with our third parties and seek relationships based on trust, fairness, and mutual advantage.

WE ARE BUSINESS PARTNERS

DOING BUSINESS WITH METROHEALTH →

*THIRD-PARTY REGISTRATION, IDENTIFICATION,
AND TERMINATION* →

*PROTECTING COMPANY CONFIDENTIAL
INFORMATION AND TRADE SECRETS* →

*FINANCIAL INTEGRITY AND ACCURATE
RECORDKEEPING* →

EMERGENCY PREPAREDNESS →

RIGHT TO AUDIT →



Doing Business with MetroHealth

MetroHealth conducts our business relationships with honesty, fairness, and mutual respect. Our third parties conduct all negotiations with MetroHealth solely with representatives of our Supply Chain and Legal departments and negotiate in an ethical manner. The MetroHealth Supply Chain department awards agreements for the procurement of products and services on the basis of objective criteria. Only authorized signatories may sign agreements that bind MetroHealth. For product and services agreements, the expected MetroHealth signatory is an Executive Director of Supply Chain or their designee. Agreements that are not executed by an authorized signatory may adversely impact the third party's ability to receive payment for products or services provided to MetroHealth.

Third parties generally agree to use standard MetroHealth agreement documents. We expect third parties to carry reasonable business insurance based upon the products or services offered.

Should a third party have access to MetroHealth protected health information (PHI) or any other sensitive data types, such as payment card industry (PCI), personally identifiable information (PII), or other hospital confidential data, the third party completes the third-party risk assessment during the contracting process between MetroHealth and the third party.

WE ARE BUSINESS PARTNERS

Third-Party Registration, Identification, and Termination

MetroHealth is committed to delivering the best in patient care. We recognize that our valued third parties are an essential part of our delivering on this commitment. Our third-party registration and identification system, Vendormate, streamlines third party onboarding and the collection and management of key information regarding regulatory and compliance risks. In addition, Vendormate provides guidance on our policies and procedures that third parties follow when conducting business with MetroHealth.

MetroHealth provides contractor badges to third-party contractors that have an on-site business purpose to perform a work product under a contract agreement between MetroHealth and the third party. MetroHealth confirms completion of onboarding requirements prior to authorizing a contractor badge. All third parties that do not have a MetroHealth badge require an appointment with a MetroHealth contact before visiting a MetroHealth location. All third parties who do not have a MetroHealth or contractor badge sign in at the Vendormate kiosk located in the main lobby area of MetroHealth locations and print a vendor pass identification label. Third parties display their contractor badge or vendor pass identification label and keep it visible at all times while on the premises of MetroHealth and engaged in MetroHealth-related business. Refer to the [Clinical Vendor Visitation Handbook](#) for additional guidance on appropriate registration and identification procedures.

When a contractor's assignment at MetroHealth ends or if the contractor terminates employment with the third party prior to the assignment end date, the third party notifies MetroHealth. Third parties return all contractor badges to MetroHealth at the expiration of the contract agreement or when the contractor's assignment with MetroHealth is completed.

WE ARE BUSINESS PARTNERS

Protecting Company Confidential Information and Trade Secrets

Third parties share a responsibility to protect our proprietary information from loss, misuse, or inappropriate disclosure. While working with MetroHealth, third parties may become aware of or acquire certain MetroHealth confidential information, or enterprise protected information. We rely on third parties to safeguard and protect the confidentiality of such information, never share such information without proper authorization, and return and/or destroy it as specified by MetroHealth. If MetroHealth and a third party share enterprise protected information, both parties execute a Confidentiality or Non-Disclosure Agreement.



WE ARE BUSINESS PARTNERS

Key Definition

Enterprise protected information:

Data that includes protected health information (PHI), electronic protected health information (ePHI), personally identifiable information (PII), payment card information (PCI), financial, clinical research, intellectual property, and other confidential or sensitive data, including but not limited to, data or information related directly or indirectly to MetroHealth patient lists, information systems, financials, strategic planning, managed care plans, marketing strategies, legal and compliance matters, and any other such confidential or proprietary information obtained and/or accessed during or after the course of conducting business with MetroHealth.



Financial Integrity and Accurate Recordkeeping

MetroHealth commits to presenting an honest and transparent view of all our business records and reports. Maintaining complete and timely records inspires trust in our colleagues, patients, and third parties while demonstrating integrity to all our stakeholders. Accurate and accessible information is essential to MetroHealth so that we can make informed business and clinical decisions.

Both MetroHealth and third parties keep complete and accurate records of all matters related to the third party's business with MetroHealth. MetroHealth and third parties should:

- Never falsify or alter any business document, employment, or medical record;
- Remain alert for and immediately report possible false entries, misleading, or inappropriate statements, or omissions from our records;
- Record all transactions properly, clearly, completely, and accurately;
- Never delay or accelerate reporting of financial information; and
- Report suspected improprieties in accounting, billing and coding, patient records, timekeeping, financial reporting, or other recordkeeping matters.

WE ARE BUSINESS PARTNERS

Emergency Preparedness

A natural disaster, emergency, or pandemic is an event that may disrupt patient care and treatment within the hospital or the surrounding community. Our third parties understand the basic needs of MetroHealth when an emergency event occurs, and provide a plan to ensure the continued supply of their company's goods and/or services.

Right to Audit

We reserve the right to verify third parties' compliance with the MetroHealth Third-Party Code and all applicable MetroHealth policies, procedures, and requirements. MetroHealth shall have access to and the right to examine and copy any books, documents, papers, and records of a third party's transactions related to business with MetroHealth. The terms and conditions of each third party's binding agreement further outlines the right to audit.

WE ARE BUSINESS PARTNERS



[Index](#) [Contacts](#) [Back](#) [Next](#)





MetroHealth maintains a culture of doing the right thing, and acting with ethics and integrity is central to everything we do. We are a public hospital operating in a highly regulated industry and hold ourselves to the highest standards. We comply with laws and regulations, as well as MetroHealth policies and procedures. Our third parties uphold our ethical values and maintain a robust system of compliance.

WE PROMOTE A CULTURE OF ETHICS AND COMPLIANCE

[COMMITMENT TO AN ETHICAL CULTURE](#) →

[COMPLIANCE WITH THE THIRD-PARTY CODE](#) →

[COMPLIANCE WITH LAWS](#) →

[INELIGIBLE THIRD PARTIES](#) →

[CONFLICTS OF INTEREST](#) →

[BRIBERY AND CORRUPTION](#) →

[BUSINESS COURTESIES AND GIFTS](#) →

[REPORTING CONCERNS](#) →



Commitment to an Ethical Culture

In addition to following our Third-Party Code, MetroHealth encourages third parties to have their own culture of ethics. This may include membership to ethics and compliance associations or organizations, as well as following any other industry-specific required or recommended codes of conduct. Ethics and compliance associations are available to provide educational opportunities, compliance certifications, networking, and other resources related to ethics and compliance matters.

Compliance with the Third-Party Code

Our third parties follow the Third-Party Code. These principles should be at the core of every business interaction made with or on behalf of MetroHealth. Third parties follow the Third-Party Code and our standards, laws, or regulations because failure to do so can lead to loss of trust from our colleagues, our patients, and the community. Annually, third parties will acknowledge and attest to their commitment to follow the expectations and guidelines outlined in the Third-Party Code. Third parties may face consequences for non-compliance.

WE PROMOTE A CULTURE OF ETHICS AND COMPLIANCE

Compliance with Laws

MetroHealth operates in a highly regulated industry subject to extensive and complex federal and state laws, rules, regulations, and complex standards. We comply with all requirements that apply to our business to protect MetroHealth, our patients, and the Medicare and Medicaid programs. Our third parties also comply with applicable laws, rules, regulations, contractual agreements, and other requirements, including non-discrimination and equal employment opportunity provisions.

Third parties acknowledge that MetroHealth is subject to Ohio laws and rules, including but not limited to, Ohio's Public Records Law and the public competitive procurement laws, rules, and opinions applicable to Ohio county hospitals governed by the Ohio Revised Code - ORC Chapter 339.

Third parties comply with all applicable MetroHealth policies, procedures, and protocols, relating to the performance of its business obligations with MetroHealth. Third parties also comply with the [MetroHealth Code of Conduct – This Is Who We Are](#), to the full extent that is applicable.

WE PROMOTE A CULTURE OF ETHICS AND COMPLIANCE





ELIGIBILITY

Ineligible Third Parties

MetroHealth complies with all state and federal healthcare program requirements.

To support our compliance, we do not knowingly contract with, employ, or bill for:

- Services provided by an individual or entity excluded from or ineligible to participate in state or federal healthcare programs;
- Individuals or entities suspended or debarred from federal government contracts; or
- Suspended or debarred individuals or entities that have not been reinstated in a federal health care program after a period of exclusion, suspension, debarment, or ineligibility.

We routinely monitor the Ohio Department of Medicaid Provider Exclusions and Suspension List, the Office of Inspector General's List of Excluded Individuals and Entities (LEIE), the General Services Administration's System for Award Management (SAM), and the Department of Treasury's Specifically Designated Nationals and Blocked Persons List (SDN). MetroHealth requires third parties to immediately notify us if they or anyone providing services for MetroHealth appears on these lists or is otherwise excluded from state or federal healthcare programs.

WE PROMOTE A CULTURE OF ETHICS AND COMPLIANCE



Conflicts of Interest

MetroHealth makes decisions and acts in the best interest of the hospital rather than for personal gain. We exercise the utmost good faith in all our business transactions. The relationships and financial interests between a third party's key individual and MetroHealth may result in a conflict of interest requiring disclosure and review.

Third parties fully disclose any potential or actual conflict of interest involving MetroHealth and the third party's key individual to the management of the Supply Chain and Ethics and Compliance departments. MetroHealth requires formal documentation of these disclosures.

Third parties do not use their positions, or knowledge gained from their positions, in such a way that a conflict of interest might arise between the interest of MetroHealth and their own. Third parties will not disclose any confidential or sensitive matters of MetroHealth, including MetroHealth patient or business information.

Key Definition

Key individual:

An owner, board member, senior leader, clinician, and anyone involved in decision-making for the potential transaction, including their immediate family members.

WE PROMOTE A CULTURE OF ETHICS AND COMPLIANCE



Bribery and Corruption

MetroHealth inspires trust in our business transactions by prohibiting transactions that are or appear to be corrupt or contain bribes. Third parties share the responsibility to help prevent bribery and corruption. Third parties comply with all applicable anti-bribery and anti-corruption laws, including Ohio Ethics Law. MetroHealth strictly prohibits third parties from offering, promising, or receiving anything of value that exhibits a substantial and improper influence on or from a MetroHealth workforce member, government official, or other non-government business partner. MetroHealth does not tolerate any act of bribery or corruption.

Key Definition

MetroHealth workforce member(s):

Employees, providers, volunteers, trainees, and other persons whose conduct, in the performance of work for MetroHealth, is under the direct control of such entity, whether or not they are paid by MetroHealth.

WE PROMOTE A CULTURE OF ETHICS AND COMPLIANCE

Business Courtesies and Gifts

MetroHealth conducts business with honesty and in a manner free of undue influences, including but not limited to, accepting elaborate gifts, entertainment, and business courtesies from current or prospective third parties. An occasional gift, entertainment, or business courtesy may appear as a normal part of doing business, but sometimes even good intentions can cross the line or could be illegal. The rules governing gifts, entertainment, and business courtesies for MetroHealth can be complicated, especially since MetroHealth is a public hospital and follows the Ohio Ethics Law.

We permit an occasional gift, entertainment, or business courtesy of nominal value so long as it:

- Complies with our policies, applicable laws, rules, and regulations, and with the policies of the current or prospective third party;
- Does not influence or appear to influence the judgment of a MetroHealth workforce member;
- Does not bring into question MetroHealth's motives, business integrity, appropriate business practices, or reputation;
- Does not induce or reward referral of patients, with or without intention;
- Does not involve entertainment offered or sponsored by the third party that is primarily of social value (entertainment does not include business meals or functions directly related to hospital business; said meals or entertainment functions are unsolicited and proportional to the related business activity);
- Does not include cash or cash equivalents (e.g., gift cards or certificates for specific stores);
- Is less than \$75 total, per calendar year, from a current or prospective third party; and
- Does not occur during the bidding process by a current or prospective third party.

WE PROMOTE A CULTURE OF ETHICS AND COMPLIANCE

Reporting Concerns

Speaking up takes courage. When we report concerns in good faith, we protect ourselves, our colleagues, our patients, and MetroHealth. We promote a psychologically safe environment where third parties can comfortably ask questions or raise concerns. If you see or suspect a situation that violates our Third-Party Code, policies, or the law, please report it. MetroHealth takes all reported concerns seriously.

To anonymously report a compliance concern about suspected misconduct or violations, without fear of retaliation, you may utilize any method below 24 hours a day, 7 days a week:

- Call the MetroHealth Ethics Line (MEL) at 216-778-1660
- Visit www.metrohealth.org/compliance
- Text 216-600-1456

MetroHealth supports third parties who report suspected wrongdoing in good faith and prohibits retaliation against any person who reports a suspected violation or wrongdoing in good faith.

MetroHealth encourages third parties to provide their own reporting hotline or mechanism for their employees to report concerns about suspected misconduct or violations. Third parties should investigate reports and take corrective action if needed. Third parties should also establish a nonretaliation policy to ensure that employees feel comfortable reporting concerns.

WE PROMOTE A CULTURE OF ETHICS AND COMPLIANCE



We serve as guardians of health and wellness for our patients. We provide high-quality care to each patient, ensuring we set and uphold the highest standards for ethical behavior and care delivery in our community. Our third parties respect our patients and protect their data from improper use or disclosure.

WE PROTECT PATIENTS AND THEIR DATA

[BUSINESS ASSOCIATES](#) →

[PHOTOGRAPHY AND AUDIO RECORDING](#) →

[VISITATION AND CLINICAL INTERACTION](#) →

[VACCINATION PROGRAM](#) →



Business Associates

Business Associates (BAs) are third parties that perform functions, activities, or services for MetroHealth involving the use or disclosure of protected health information (PHI). BAs comply with certain provisions of the HIPAA Privacy and Security Rules.

All BAs execute a Business Associate Agreement (BAA). BAAs establish the permitted and required uses and disclosures for PHI, as well as require the BA to actively protect PHI. For instance, BAs only access and use the minimum necessary PHI to carry out their contracted functions or activities.

BAs notify MetroHealth immediately if they become aware of any alleged unauthorized use and/or disclosure of PHI.

WE PROTECT PATIENTS AND THEIR DATA

Photography and Audio Recording

Third parties may only photograph (including video) or audio record at MetroHealth facilities when authorized to do so by MetroHealth through a written agreement. Examples of photography and audio recording include, but are not limited to, the use of hard hat cameras at construction sites or recording a patient's voice for commemorative purposes.

Should a written agreement between the third party and MetroHealth not address such recordings, third parties contact the MetroHealth Privacy Officer before initiating any photography or audio recording at MetroHealth.



WE PROTECT PATIENTS AND THEIR DATA



[Index](#) [Contacts](#) [Back](#) [Next](#)



Visitation and Clinical Area Interaction

We provide safe, equitable, high-quality care in a manner that is sensitive to our patients' individual needs. To help ensure patient care and safety, the proper identification of third parties is critical. MetroHealth has uniform guidelines for permitting third parties and their representatives access to operating rooms and other clinical and associated areas, including but not limited to, catheterization labs, hallways, physician offices, etc. Uniform guidelines require vendor representatives to wear disposable scrubs, which representatives can obtain through a vending machine in close proximity to the Vendormate registration desk. It is mandatory that vendor representatives immediately purchase these scrubs after receiving their identification badge from Vendormate. [The Clinical Vendor Visitation Handbook](#) describes these guidelines, and third parties follow these guidelines when visiting any MetroHealth facility.

WE PROTECT PATIENTS AND THEIR DATA

Vaccination Program

MetroHealth seeks to protect patients, employees, and the community from preventable, communicable infections, including influenza and COVID-19. Influenza and COVID-19 vaccines are effective methods to prevent severe illness and death. Employees of third parties who perform work at MetroHealth locations obtain influenza and COVID-19 vaccines, including annual boosters, or obtain an approved exemption. Third parties are responsible for maintaining vaccination and exemption statuses of their employees and make documentation available to MetroHealth upon request. For additional information on our Vaccination Program, visit our [Supply Chain website](#).

WE PROTECT PATIENTS AND THEIR DATA





We celebrate our diversity and are strengthened by our different backgrounds and experiences. Treating each other with fairness and respect is fundamental to who we are. We invite conversation to create the best possible outcome for everyone involved. Our third parties treat their own employees and MetroHealth colleagues with fairness and respect.

WE RESPECT EACH OTHER

EQUITY, INCLUSION, AND DIVERSITY →



WORKPLACE HEALTH AND SAFETY →



PROFESSIONAL CONDUCT →



DRUG-FREE WORKPLACE →



FORCED LABOR AND HUMAN RIGHTS →



Equity, Inclusion, and Diversity

We flourish when our teams invite and value each person's unique contributions and perspectives. We always do our part to help create a positive work environment where our colleagues can contribute and fully utilize their talents.

MetroHealth is an equal opportunity employer, committed to maintaining non-discriminatory policies, practices, and treatment in all facets of employment. MetroHealth supports diversity and inclusion in all its activities and applies principles of diversity, equity, inclusion, and non-discrimination to its relationships with third parties, workforce members, patients, and the community. Our third parties commit to these same principles.

WE RESPECT EACH OTHER



Workplace Health and Safety

MetroHealth commits to providing a healthy and safe workplace for our colleagues, patients, their families, loved ones, and others who visit our facilities. Together, MetroHealth and our third parties uphold our commitment to the health and safety of our community.

To meet our commitment, third parties abide by workplace health and safety guidelines outlined in the [MetroHealth Code of Conduct – This Is Who We Are](#) and the [Clinical Vendor Visitation Handbook](#). While conducting business at MetroHealth, third parties watch for and report safety hazards to the appropriate department. These hazards may include, but are not limited to, medical waste, hazardous chemicals, slip and fall hazards, damaged or unmaintained equipment, electrical hazards, or unauthorized weapons on our premises. MetroHealth prohibits the possession of firearms, other weapons, explosive devices, or dangerous material on our premises, except as authorized and permitted by law.

WE RESPECT EACH OTHER

Professional Conduct

MetroHealth encourages our colleagues and third parties to be their best and bring their authentic selves to work. We promote a psychologically safe environment where we can work free from any form of violence, harassment, bullying, or inappropriate conduct. These actions undermine everything we stand for as an ethical organization. MetroHealth expects third parties to use good judgment and express ideas and opinions in a respectful manner.

We never tolerate violence, degrading jokes, slurs, bigotry, physical or verbal intimidation, unwelcome sexual advances, or other offensive conduct when interacting with others. Third parties immediately report any such concerns of inappropriate conduct to MetroHealth.



WE RESPECT EACH OTHER

Drug-free Workplace

MetroHealth strives to provide the safest environment possible to its patients, employees, visitors, and third parties by avoiding workplace risk associated with substance use. Third parties report to work each day free from the influence of drugs, including alcohol. MetroHealth strictly prohibits the unlawful manufacturing, distributing, dispensing, possessing, using, or selling of drugs on property owned or controlled by MetroHealth, while on duty, or while conducting MetroHealth business.

MetroHealth may conduct searches of third-party workers and representatives, including their personal effects and vehicles, on MetroHealth-owned or controlled premises, to determine compliance with this Third-Party Code and for other lawful reasons. MetroHealth may conduct searches with or without prior notice and with or without the individual being present.

Key Definition

Drug:

Any substance that has the potential to significantly alter an individual's performance or judgment or create an unsafe environment. This includes prescription drugs, including the use of prescription drugs that have not been legally prescribed, are not being used pursuant to medical directions, and prescription drugs obtained from others; illegal drugs, including any drug or substance covered by the federal Controlled Substances Act (U.S. Code title 21); legal or over-the-counter substances, including those used in a manner inconsistent with over-the-counter directions, and alcohol in any form, including powder.

Forced Labor and Human Rights

MetroHealth believes that fair employment is a human right. MetroHealth supports and complies with applicable laws regarding human rights, forced labor, human trafficking, and child labor. MetroHealth insists that our third parties also uphold these laws. We will not knowingly do business with third parties that engage in human rights abuse of any kind. Our position on human rights is compatible with the United Nations Guiding Principles on Business and Human Rights and consistent with our Mission, Vision, and Values.

WE RESPECT EACH OTHER



We put people in our community first because, for us, it has always been the right thing to do. We act ethically and responsibly to promote the health and well-being of those in our community. Our third parties strive to put the people in our community first.

WE ARE COMMUNITY MEMBERS

[SUPPLIER DIVERSITY](#) 

[SUSTAINABILITY AND CORPORATE SOCIAL RESPONSIBILITY](#) 



Supplier Diversity

Our unsurpassed outreach and dedication to the community we serve is the core of our mission. We recognize the importance and benefits of a diverse, local, and regional supplier base. MetroHealth embraces supplier diversity, not as a response to outside regulatory agencies or mandatory requirements, but as an effort to strengthen ties with our communities. We conduct our business relationships with all third parties with honesty, fairness, mutual respect, and without discrimination. As a public hospital system which has diverse patient, workforce, and community stakeholders, MetroHealth has a compelling interest in providing equal contracting opportunities to a diverse range of businesses and persons. Accordingly, we actively encourage and solicit the participation of diverse third parties in its various contracting opportunities. Our third parties commit to these same principles

Sustainability and Corporate Social Responsibility Practices

As a recognized leader in the healthcare industry, MetroHealth commits to ensuring the delivery of high-quality services in a sustainable and socially responsible manner. Third parties proactively address environmental, social, and ethical risks, including but not limited to, risks related to climate change. MetroHealth encourages and may request public reporting on environmental sustainability and corporate social responsibility performance.

WE ARE COMMUNITY MEMBERS

MetroHealth Reporting Guide

Resource	For help with	Contact
MetroHealth Ethics Line (MEL)	Concerns, questions, or reports about suspected violations of the Code, laws, or MetroHealth policies. Anonymous reporting options.	<i>Available 24 hours a day:</i> Call: 216-778-1660 Text: 216-600-1456 www.metrohealth.org/compliance
Ethics and Compliance	Concerns, questions, or reports about suspected violations of the Third-Party Code, laws, or MetroHealth policies.	compliance@metrohealth.org
Human Resources	Concerns, questions, or reports about Human Resources issues.	laborrelations@metrohealth.org
Government Relations	Questions or concerns about political activity or any state, federal, or local legislation that affects MetroHealth.	governmentrelations@metrohealth.org
Legal	Concerns or questions about suspected violations of the law, interpretations of law, or communications under the attorney-client privilege.	legal@metrohealth.org
Supply Chain	Questions or concerns about sourcing, purchasing, vendor relations, and Vendormate.	purchasing@metrohealth.org

WE ARE METROHEALTH