



Lutheran HealthCare has a long and proud history of rendering quality healthcare services and conducting business in full compliance with the letter and spirit of all applicable laws and in accordance with the highest ethical standards. Our commitment to providing quality health care in a legal and ethical environment has been a fundamental part of our tradition and continues to set the standard of how we do business. The Board of Trustees has adopted a corporate compliance program to ensure that this commitment is upheld. The Code of Conduct, the cornerstone of the compliance program, translates that commitment into a written statement of standards of behavior for all employees, officers, and trustees/directors of Lutheran Medical Center, Lutheran Augustana Center for Extended Care and Rehabilitation, and Lutheran Medical Center's related affiliates, Medical Staff members, and agents and independent contractors who act on Lutheran's behalf.

Relationships with vendors, subcontractors and suppliers are handled in a fair and reasonable manner, consistent with all applicable laws and good business practices. Vendors, subcontractors and suppliers are selected on the basis of objective criteria, including standards of quality, service, price, delivery capability and technical excellence. Lutheran actively pursues competitive bidding through available resources including national group purchasing affiliations, regional and local alliances. All purchasing decisions are based on price and the supplier's abilities to meet our needs. Under no circumstances are decisions based on personal relationships, whether the relationship involves the employee, an officer or trustee of Lutheran, a family member or a friend. We employ the highest ethical standards in business practices in source selection, negotiation, determination of contract awards and the administration of all purchasing activities. Lutheran does not knowingly enter into contracts or do business with vendors convicted of a criminal offense related to health care or who has been excluded from or is otherwise ineligible to participate in federal or state health care programs.

Lutheran does business with only those vendors, subcontractors and suppliers who agree to the principles that stand behind our Code of Conduct and compliance program. In accordance with the Deficit Reduction Act of 2005, Lutheran is committed to educating vendors and contractors about its compliance program and policies. Questions regarding any aspect of the compliance program or policies should be directed to the Compliance Office at 718-630-7300 or the Legal Department at 718-630-6342.

[Summary of Code of Ethics and Business Conduct](#)

[Vendor Policy](#)

[Bid Policy](#)

[Conflicts of Interest](#)

[Federal Deficit Reduction Act Policy](#)