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Policy Title: Personal Use of Covenant Contracts and Vendors
Policy Type: Administrative Policy, Section: Corporate Compliance
Policy Number: AP 1248

Operations Director: Chief Compliance Officer
Policy Owner: Compliance Specialist
Last Approved Date: October 2021

Purpose: To establish guidelines for personal purchases from vendors by Covenant HealthCare colleagues (directors, officers, employees, medical staff, volunteers, suppliers, vendors, contractors, consultants and agents).

Scope: Covenant HealthCare System and its wholly-owned tax-exempt entities, including, without limitation, Covenant Medical Center, Inc. (collectively referred to as "Covenant").

Definition: Personal purchase – For purposes of this policy, a personal purchase is when a product or service or anything of value is procured for a purpose not related to Covenant business, through the use of an account or other arrangement/contract that is established for Covenant's business purposes. A personal purchase is not one made for Covenant colleagues as a group, with the approval of the Human Resources Department, that is a special purchase in the nature of an employee appreciation or reward program. Covenant shall communicate the existence of such special purchase arrangements to its colleagues.

Policy: Personal purchases from vendors (and discounts associated with such purchases) are prohibited, regardless of whether made using Covenant's tax exempt status, because of the risk posed to Covenant's tax exempt status.

This policy is intended to support and complement the Covenant Code of Conduct.

References:

- [Code of Conduct](#)
- [Employee Discounts](#)

Effective Date: April 2000

Review Date: November 2021

Next Review Date: November 2024

Reviewed by: Corporate Compliance
Executive Team

Approved by:

Kevin Birchmeier, Executive Vice President/Operations

November 2021