

I. CODE OF CONDUCT

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PURPOSE: This Code of Conduct has been adopted by Alice Hyde Medical Center (“AHMC” or “Medical Center”) to provide standards to guide all employees, members of the Board of Directors, Medical Staff, volunteers, contractors, and vendors (all referred to hereinafter as “the AHMC Community” or “Community Members”), to protect and promote integrity, and to enhance the Medical Center’s ability to achieve its declared mission.

MISSION STATEMENT: Building a Healthier Community Together.

VISION STATEMENT: Alice Hyde Medical Center will distinguish itself as a trusted and respected health care leader and provider of choice, exceeding expectations through service excellence.

VALUES: “REACH”

Respectful: Treat those we serve, and who serve with us, as they would like to be treated.

Excellence: Exceeding expectations in all that we do.

Accountable: Maintain high standards and ownership of responsibilities.

Caring: Treat everyone with dignity and compassion.

Honest: Conduct ourselves in a truthful, professional, and ethical manner.

INTRODUCTION: This Code of Conduct contains principles which articulate the broad policy goals and standards of AHMC and shall be used to guide the behavior of the AHMC Community. A copy of the Code should be distributed periodically to all AHMC Community Members to ensure that their behaviors and activities are consistent with this Code of Conduct.

LEGAL COMPLIANCE

AHMC shall strive to ensure that all activities by or on behalf of the Medical Center are in compliance with applicable laws and regulations. The AHMC Community is expected to comply with all laws, regulations, Medical Center policies, as well as standards for accreditation established by the Joint Commission and other applicable accrediting authorities. Community Members are required to know and follow the laws, regulations, policies, and procedures that apply to their jobs. Failure to do so could result in exclusion from participation in federal and state health care programs, civil monetary penalties, and loss of licensure. An employee who fails to abide by these standards may be subject to disciplinary action by AHMC in accordance with the Human Resources Discharge and Discipline Policy.

- TAX EXEMPTION: As a tax-exempt, not-for-profit entity, AHMC has a legal and ethical duty to act in compliance with applicable tax laws, to engage in activities in furtherance of its charitable purpose, and to ensure that its resources are used in a manner that furthers the public good rather than the private or personal interest of any individual. In order to fulfill these obligations, AHMC shall avoid compensation arrangements in excess of fair market value, shall file all tax returns in a manner consistent with applicable laws, and shall avoid the appearance of impropriety as well as actual impropriety. Further, as a tax-exempt, not-for-profit entity, AHMC is strictly prohibited from engaging in political activity, including, but not limited to, making political contributions and opposing or endorsing political candidates.

- **EQUAL EMPLOYMENT OPPORTUNITY:** AHMC believes that fair and equitable treatment of everyone in the AHMC Community and those who deal with AHMC is essential to fulfilling its mission, vision, and goals. To further this policy, all employees will be hired, trained, promoted, transferred, laid-off, and terminated based on their abilities, achievements, and conduct without regard to race, color, religion, sex, sexual orientation, ethnic origin, age, or disability, or any other classification prohibited by law. Additionally, harassment and discrimination on the basis of race, color, religion, sex, sexual orientation, ethnic origin, age, or disability is strictly prohibited. Every allegation of harassment or discrimination will be promptly investigated by the Medical Center.
- **SAFETY:** AHMC is committed to providing a safe environment for all Community Members, patients, and visitors of the Medical Center. AHMC shall abide by all applicable laws, regulations, rules, and guidelines to ensure an environment free from recognized hazards that could cause harm to Community Members, patients, and visitors. Employees who notice a potential or actual infringement of these laws should notify their Department Manager or Human Resource Director. Additionally, each member of the AHMC Community is responsible for carrying out his or her responsibilities in a safe and efficient manner.
- **EMERGENCY CARE:** AHMC has a duty to uphold EMTALA's requirements to provide screening, stabilization, and transfer services for individuals with emergency medical conditions. Under no circumstances shall individuals be discouraged from entering the emergency department or directed to another emergency department if such individuals are seeking a medical screening examination at AHMC.
- **PHARMACEUTICALS AND CONTROLLED SUBSTANCES:** AHMC Community Members responsible for, or with access to, prescription drugs, controlled substances, over-the-counter drugs, or any street-valued medical supplies (for example, needles), shall maintain the highest possible professional and ethical standards with regard to them. Dispensing of all drugs shall be upon the order of a licensed professional. Drugs and supplies shall be kept secure at all times.

BUSINESS ETHICS

In furtherance of AHMC's commitment to the highest standards of business ethics and integrity, all AHMC Community Members shall accurately and honestly represent the Medical Center and shall not engage in activity or scheme intended to defraud anyone of money, property, or honest services.

- **HONEST COMMUNICATION:** AHMC requires candor and honesty from all Community Members in the performance of their responsibilities and in communication with the Medical Center's attorneys and auditors. It shall be a violation of this code to knowingly make false or misleading statements of any kind about the Medical Center, its products and services or about competing entities and their products or services to any person or entity doing business with the Medical Center.
- **DUTY TO REPORT KNOWN OR SUSPECTED VIOLATIONS:** The AHMC Community shall be committed to ensuring that AHMC provides high-quality, compassionate, skilled patient care in a safe and healing environment. Consistent with this commitment, Community Members have an obligation to report in good faith any

known or suspected violation of a law, regulation, or Medical Center policy. AHMC Community Members are encouraged to report concerns of non-compliance first to their supervisor, if appropriate. Reports can also be made to the Compliance Officer or the Human Resources Director. All reports are treated confidentially. Retaliation against an AHMC Community Member who in good faith raises concerns or reports misconduct will not be tolerated by the Medical Center.

- ACCURACY, RETENTION, AND DISPOSAL OF RECORDS AND DOCUMENTS: The AHMC Community is responsible for the integrity and accuracy of the Medical Center's documents and records, not only to ensure compliance with regulatory and legal requirements, but also to ensure that records are available to prove or defend business practices. No one may alter or falsify information on any record or document. The AHMC Community members are responsible for documentation, for coding and billing of any products or services, as well as for financial reporting, and shall perform such duties accurately, truthfully, and promptly.
- FINANCIAL RECORDS: AHMC has endeavored to establish and maintain a high standard of accuracy and completeness in the documentation and reporting of all financial records. These records serve as a basis for managing our business and are important in meeting our obligations to patients, colleagues, shareholders, suppliers, and others. They are also necessary for compliance with tax and financial reporting requirements. All financial information must reflect actual transactions and conform to generally accepted accounting principles. No undisclosed or unrecorded funds or assets may be established. AHMC maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are recorded in a proper manner so as to maintain accountability of the organization's assets.
- HARRASSMENT: AHMC Community Members shall be able to seek, obtain, and hold employment without being subject to harassment based on sex, sexual orientation, race, color, gender, age, disability, religion, ethnic origin, or any other classification identified by law. AHMC is committed to providing Community Members with an environment free from harassment and intimidation. Sexual harassment is of particular concern. Any unwelcome verbal or physical conduct, such as jokes, innuendos, slurs, touching, gesturing, or other verbal or physical conduct of a sexual nature shall be considered harassment in violation of this policy and may subject the offender to disciplinary action.
- DISRUPTIVE CONDUCT: AHMC expects all Community Members to use common sense and good judgment. The AHMC Community is held to the highest standard of conduct, etiquette, and professionalism in all employment-related dealings with patients, visitors, vendors, and co-workers. Any Community Member who exhibits unprofessional conduct of any kind, including, but not limited to, disruptive, discourteous, disrespectful or abusive behavior, threats or physical assaults, or sexual harassment to others shall be subject to disciplinary action.
- MEDICAL CENTER ASSETS AND RESOURCES: The AHMC Community shall protect Medical Center assets and resources from loss, damage, theft, misuse, and waste with the same degree of care that would be used to protect one's own assets. Assets and resources of the Medical Center include supplies, equipment, space, and community time.

- **AGENTS AND INDEPENDENT CONTRACTORS:** The Medical Center is committed to ensuring that individuals and businesses acting as agents on its behalf, such as consultants and independent contractors, will comply with the Corporate Compliance Program. Consultants and independent contractors must read the Corporate Compliance Program Manual and acknowledge their agreement to abide by the policies and procedures of the Medical Center and state and federal laws and regulations. The Medical Center will not knowingly conduct business with any entity that has been excluded from participation in the Medicare and Medicaid programs, or any other federal benefit program. The AHMC Community and agents of the Medical Center are screened, through the Office of the Medicaid Inspector General's Exclusion List to ensure that the Medical Center is not employing or doing business with excluded persons.

CONFIDENTIALITY

In accordance with applicable legal and ethical standards, the AHMC Community shall maintain the confidentiality of information about patients, employees, and the Medical Center itself. Community Members are in possession and have access to a wide array of confidential and sensitive information, including protected health information, the inappropriate release of which may be unlawful or could be injurious to individuals. Community Members shall actively protect and safeguard confidential information in a manner designed to prevent unauthorized disclosure.

- **PROTECTED HEALTH INFORMATION:** AHMC Community Members shall conduct themselves in accordance with applicable laws and regulations to comply with the principle of maintaining the confidentiality of protected health information to which the Medical Center is given access in the course of providing care and treatment to patients. AHMC does not use or disclose individually identifiable patient information unless it is necessary for treatment of the patient, payment for services, the operations of AHMC, or as required by law. Members of the AHMC Community may only access patient information, the minimum necessary, when it is required for job performance. Community Members are expected to comply strictly with Federal and State laws and regulations regarding the confidentiality of protected health information.
- **CERTAIN FINANCIAL INFORMATION:** AHMC believes in transparency of certain financial information. It makes its IRS Form 990 available to the public upon request.

CONFLICTS OF INTEREST

The AHMC Community owes a duty of undivided and unqualified loyalty to the Medical Center and may not use their positions and affiliations with AHMC to profit personally or assist others in profiting in any way at the expense of the Medical Center. Community Members shall avoid actual impropriety and the appearance of impropriety. Community Members are required to disclose any and all conflicts of interest to the Medical Center. A conflict of interest may occur if a Community Member's outside activities or personal interests influence or appear to influence his or her ability to make objective decisions in the course of that person's job responsibilities. AHMC has developed a Conflict of Interest Policy and Annual Disclosure Statement and the Audit and Compliance Committee of the Board is charged with overseeing compliance with this Policy.

RELATIONSHIPS WITH OTHERS

AHMC transactions with other organizations shall be free from offers or solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction. The standards set forth below are intended to guide the AHMC Community in determining the appropriateness of certain activities or behaviors in the context of Medical Center activities and relationships. This policy shall be construed broadly to avoid even the appearance of improper activity.

- **GIFTS AND GRATUITIES**: The AHMC Community is expected to uphold the highest professional standards in interactions with vendors and patients and to avoid any transaction or business arrangement that could improperly influence decision-making or patient care. Certain business courtesies, such as payment for a reasonable lunch or dinner in conjunction with a business meeting, normally are not considered gifts within the meaning of this policy. Community Members are never permitted to accept a gift or payment for any activity of more than token value from any individual or organization with whom the Medical Center does business, has done business, or may in the foreseeable future do business. Cash gifts are never acceptable under any circumstances. Community Members are expected to notify their supervisor if they are unsure whether or not a gift should be accepted.

- **Bribes, Kickbacks and Inappropriate Referrals**: There are a number of laws governing Medicare, Medicaid and other federal health programs. These laws include the Federal Anti-Kickback Statute, Self-Referral Law and Stark Laws. These laws prohibit providers and organizations from engaging in certain activities that may induce the referral of Medicare or Medicaid patients or to induce the purchase of goods or services to be paid for by Medicare or Medicaid. Types of activities that are likely to violate these laws include, but are not limited to:
 - Soliciting, receiving, offering to pay, or paying remuneration of any kind (including rebates, kickbacks, or bribes) in exchange for referring or recommending the referral of any individual to another person, hospital or affiliated entity of the Medical Center for services or in return for the purchase of goods or services to be paid for by Medicare or Medicaid;
 - Offering or granting any benefit to a referring physician or other referral source in order to influence the physician or referral source to refer or agree to refer any patients to a person or medical facility;
 - Physicians making referrals for designated health services to entities in which they have a financial interest either through ownership or a compensation arrangement; and
 - Billing for services rendered as a result of an illegal referral.

If any of our Community Members or other agents believe that an illegal arrangement has been made or may be entered into involving the Medical Center and a referral source or a vendor of goods or services, the situation should be discussed with the Department Manager, Supervisor, or the Compliance Officer.

PATIENT RIGHTS

AHMC follows ethical behavior in its care, treatment, services, and business practices. Patients receive a copy of the Patients'/Residents' Bill of Rights upon admission to the Medical Center. This Bill of Rights is also posted throughout the Medical Center. AHMC strives to provide high quality healthcare that responds to the needs of patients, their families, and the Community as a whole. The care provided must be reasonable and necessary to the care of each patient, as appropriate to the situation, and, provided by a properly qualified individual. All such care shall be properly documented as required by law and regulation, payer requirements, and professional standards. AHMC Community Members are expected to report any quality concerns or questions to their Department Manager.