




Stormont Vail Health

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Mission

Working together to improve the health of our community.

Vision

Stormont Vail Health will be a national leader in providing compassionate, high-quality and efficient integrated care through collaboration that results in a healthier community.

Values

Service to Others: We meet or exceed the needs and expectations of those we serve.

Quality: We create an environment of trust, comfort and confidence brought about by a competent, compassionate and caring staff.

Teamwork: We do together what cannot be done alone.

Respect: We honor the dignity and creative potential of each staff member.

Viability: We assure our mission by remaining profitable.

Code of Conduct Integrity and Compliance Program

A Message from the President and CEO

Stormont Vail Health has a mission and community commitment of “Working together to improve the health of our community.” An important part of that commitment is our pride in fair and honest dealings with the public, including patients, private and governmental payers, and vendors, all of whom are important to our success. It is with this in mind that we have put in place a Code of Conduct and Integrity & Corporate Compliance Program that describes the standards by which we will do business.

I encourage you to read this booklet and ask questions regarding the information it contains. I also ask that you work closely with the administrative staff to help us identify and bring to our attention areas where we may need improvement in order to comply with the rules, regulations and ethical standards.

Thank you for doing a great job in serving our patients.

Best regards,



Robert S. Kenagy MD
President and CEO



“Working together to improve the health of our community.”

A Message from the Integrity & Compliance Department

Welcome to Stormont Vail Health.



You are joining a family of caring, hard-working and ethically minded individuals, who work every day to make us the healthcare provider of choice in northeast Kansas. The Stormont Vail Code of Conduct (Code) has been designed to guide and assist employees with the performance of their daily activities. It is imperative for all parties who deal with Stormont Vail Health to have faith, trust and confidence in the organization and to know that they have a means of communicating known or suspected violations of the code through the hospital's anonymous Stormont Vail Ethics and Compliance Reporting line, as noted below or through direct contact with the Integrity & Compliance Department.

This code applies to board members, officers, employees and medical staff members as well as vendors and agents of Stormont Vail Health and its subsidiaries. Each person is individually responsible for his or her own conduct in complying with this Code. After all integrity and compliance is **UP TO YOU!**

Any employee, medical staff member or vendor must report a known or suspected violation of applicable laws, regulations or the Code of Conduct using one of the following methods:

1. By reporting it to your supervisor, manager, director or any member of the Stormont Vail Operating Committee;
2. By reporting orally or in writing to Kevin Steck, Chief Compliance Officer, Stormont Vail Health, Inc., 1500 S.W. 10th Ave. Topeka, KS 66604-1301, (785) 354-6008 or compliance@stormontvail.org; or
3. By reporting through the Ethics and Compliance Reporting line at (833)-784-8728 or (833) SVH-UP2U, or Up2U.ethicspoint.com, a confidential, independent service receives anonymous reports about Stormont Vail Health and related business and transmits summary reports to the Integrity & Compliance Department for follow-up.



Retaliation against any person for reporting a violation or suspected violation in good faith is strictly prohibited by Stormont Vail Health. Stormont Vail Health has adopted a Whistleblower Policy that serves to inform employees, contracted staff and agents as to the details, remedies and protections afforded to you through federal and state laws.

If you have any questions about the Code or any other compliance related matters, please do not hesitate to contact any member of the Integrity & Compliance Department.

Code of Conduct Integrity and Compliance Program

Introduction

The long-standing policy of Stormont Vail Health is to observe all laws applicable to its business. This commitment does not stop here. Even when the law is permissive, Stormont Vail Health chooses the course of integrity. The Code of Conduct of Stormont Vail Health was prepared to provide the Board of Directors, officers, employees, medical staff members, as well as vendors and the general public, with a formal statement of Stormont Vail Health's expectations regarding commitment to the standards and rules of ethical business conduct and compliance with applicable laws and regulations.

The Code of Conduct applies to all subsidiaries of Stormont Vail Health and divisions, departments or unites using business names of Stormont Vail Health such as Cotton O'Neil Clinic, Cotton O'Neil Pediatrics, Cotton O'Neil Emporia, Stormont Vail Retail Pharmacy, and so forth, upon agreement by the boards of those subsidiaries. This includes but is not limited to Stormont Vail Foundation, Stormont Vail Health, ExcellENT Surgery Center, LLC, and Century Health Solutions, Inc.

Throughout this Code, "vendor" refers to any person and/or representatives of any person or company wanting to conduct business with Stormont Vail Health (which hereafter refers to Stormont Vail Health and its subsidiaries, divisions and/or departments). Board members, officers, employees, medical staff members and vendors to whom this Code applies may be referenced as we, us, you, party or parties, and similar terms implying inclusion.

It is imperative that we comply with the standards contained in the Code, immediately report any

alleged violations and be willing to assist in investigating any allegation of wrongdoing. It is the policy of Stormont Vail Health to prevent the occurrence of unethical or unlawful behavior, to halt such behavior as soon as reasonable possible after its discovery, and to investigate and take appropriate corrective action for violations of the standards contained in the Code or applicable laws and regulations.

Although Stormont Vail Health has attempted to cover many compliance-related circumstances in the Code, we may encounter situations that are not specifically addressed. In those instances we apply the overall philosophy and concepts of this Code to the situation, along with the ethical standards the public should expect of us. If a question still exists in your mind, the particular circumstances should be reviewed with your supervisor, manager, director, any member of the Stormont Vail Operating Committee, or the Stormont Vail Health Integrity and Compliance Department.

This code is not intended to create a contract between Stormont Vail Health and any person, or to give any person any rights against Stormont Vail Health. This Code may be modified at any time at the discretion of Stormont Vail Health.

Compliance with Federal Health Programs (Medicare, Medicaid, etc.)

Stormont Vail Health provides services governed by federal, state and local laws and regulations.

Practices prohibited by these laws and regulations include filing of false claims, illegal patient referrals, providing medically unnecessary services, violating the Medicare Conditions of Participation, and many others.

All Stormont Vail Health team members must understand and comply with all these laws and regulations. If you have questions or concerns, contact the:

- Patient Financial Services department, or
- Integrity & Compliance department

Medical Staff Compliance and Relations

Medical staff members are expected to comply with all federal and state laws along with:

- Provisions of medical staff bylaws and rules and regulations of the institution(s) at which they are credentialed.
- All applicable Joint Commission standards.
- The Stormont Vail Health Code of Conduct.
- And Stormont Vail Health policies.

Any violation of these standards must be reported to the appropriate chief of staff or chief medical officers, the Integrity & Compliance Department, your supervisor, Employee Relations Department and/or the Stormont Vail Ethics and Compliance Reporting Line. Medical staff at Stormont Vail Health are expected to act ethically and with integrity.

It is the policy of Stormont Vail Health that all individuals be treated courteously and with dignity and respect. All Stormont Vail Health team members, including the medical staff throughout themselves in an appropriate manner and to avoid conduct that:

- Affects the ability of others to do their jobs.
- Makes others uncomfortable or causes disruption.
- Interferes with an individual's ability to practice competently.
- Has or could have a negative effect on patient care or safety.
- Constitutes harassment or abusive personal behavior.

Excluded Providers

Stormont Vail Health periodically compares employee, provider and vendor listings against the U.S. Department of Health and Human Services Office of Inspector General's List of Excluded Individuals and Entities and the U.S. General Services Administration's Excluded Parties List System. Stormont Vail Health is obligated to ensure that it does not have impermissible relationships with any individual or entity included in those lists. Similarly, persons and companies subject to these restrictions must notify the chief compliance officer if they are included in the U.S. Department of Health and Human Services Office of Inspector General's List of Excluded Individuals and Entities, or the U.S. General Services Administration's Excluded Parties List System.

Privacy and Confidentiality of Patient Information (HIPAA, PHI & HITECH)

We must observe applicable standards of ethical and legal conduct with respect to Protected Health Information of PHI. PHI, generally, is anything you know about a patient because of your relationship with Stormont Vail Health. We all have a responsibility and duty to keep information about our patients confidential. This is any information that may identify the patient or is related to their condition, treatment or payment for services.

The federal law known as HITECH requires specific actions in response to certain types of privacy breaches. So that Stormont Vail Health may comply with the requirements of the law, you must report known or suspected privacy breaches directly to the HIPAA privacy officer in the Integrity & Compliance Department.

Q & A

Q: *I need to email a patient list to an outside vendor. Do I need to do anything to ensure the email follows HIPAA, HITECH and Stormont Vail health rules?*

A: Yes. First you need to get approval from your supervisor or director and confirm that a Business Associate Agreement (BAA) is in place. Second, if there is a BAA in place, the list you send should always contain the minimum amount of information necessary to achieve the intended purpose. Finally you must send your email encrypted.

Ethical Business Relationships & Conflicts of Interest

Stormont Vail Health is the health care provider of choice in our region because of the quality and value of our services and the respect and confidence we instill in our patients. Conducting business with vendors, including physicians, can pose ethical or even legal problems. Person, companies or organizations doing business with Stormont Vail Health are subject to the Stormont Vail Health Code of Conduct. Vendor representatives must comply with Stormont Vail Health's **Vendor Policy** to conduct business with representatives of Stormont Vail Health.

We must also avoid situations in which our personal interests could conflict, or reasonably appear to conflict, with the interests of Stormont Vail Health. Conflicts of interest occur when personal interests or activities influence, or appear to influence our ability to act in the best interest of Stormont Vail Health. The following guidelines are intended to affirm that we must make ethical decisions in potentially difficult situations.

Antitrust, Kickbacks and Rebates

We must comply with applicable antitrust laws. There must be no discussions or agreements with competitors regarding price or other terms for product sales, prices paid to suppliers or providers, dividing customer or geographic markets, price fixing for services and for any market or service, or joint action to boycott or coerce certain customers, suppliers or providers. The purchase or sale of goods and services, or patient referrals to or from Stormont Vail Health, must not lead to any person or their family members receiving kickbacks, rebates, rewards or anything of significant value. Kickbacks,

rewards or rebates can take many forms and are not limited to direct cash payments or credits. In general, if you or your family expects to gain personally through a transaction you arrange as a representative of Stormont Vail Health, it is prohibited. Such practices are unethical and in many cases illegal.

Financial Arrangements with Physicians or Other Patient Referral Sources

Federal statutes, generally known as the anti-kickback statutes and the Stark Law, substantially affect Stormont Vail Health contracts with referring physicians. No payments may be made to or by physicians in exchange for referral of any federal health care program, patients or business. Any contract between Stormont Vail Health and referring physicians should be in writing and executed by the chief executive officer or his designee. No inducement in exchange for referral of patients shall be offered to any physician. Anti-kickback laws are very

Q: *Dr. Freebie promises the hospital five admissions per week in exchange for a nurse to work in his clinic 20 hours per week for no charge. Is this agreement legal?*

A: *Providers should avoid giving or accepting anything of value in exchange for referrals. If Dr. Freebie would otherwise have to pay the expenses for a nurse to work in his office and the hospital provides it for free, this would be considered a benefit to the doctor. A promise of patient admissions to another entity in exchange for a benefit and/or compensation is both illegal and unethical.*



complicated. They often required interpretation from a qualified attorney.

Personal Financial Gain

Actions or relationships that could create a conflict of interest must be disclosed in advance and approved according to the policies of Stormont Vail Health. Avoid situations in which your personal interests conflict or appear to conflict with the interests of the organization. Such interests might include, among other things, a personal or family interest in an enterprise that has business relations with Stormont Vail Health or involve personal ties to or bias towards a contractor. (If unsure whether a potential conflict of interest exists, check with your chief compliance officer). Members of the board of directors, officers and directors annually sign a conflict of interest statement.

Outside Interests and Activities

If you own or have any type of employment or consulting relationship with an outside organization from which we buy goods or services, the situation must be reviewed by your manager. Conduct any outside consulting or other business activities on your own times. These activities must not conflict with or affect your work performance. If you are employed elsewhere, you must report the name of the employer and the type of employment to your manager, who can determine if there is a conflict of interest.

Do not provide testimonial statements or endorsements for use in a vendor or contractor's advertisement, brochure or other marketing material. Do not speak on behalf of Stormont Vail Health unless you have written approval from the marketing department or the chief compliance officer.

Participation on Community Boards

Stormont Vail Health strongly encourages employees to be involved in the communities we serve. This includes serving on boards of directors of other organizations. If you would like to serve on a board for an organization whose interest may conflict with Stormont Vail Health, you must first get approval from your supervisor or manager. If you and/or your supervisor or manager need help with the decision, contact the Integrity & Compliance Department.

Fundraising and Solicitation

In furtherance of its charitable purposes, Stormont Vail Health conducts fundraising activities through the Stormont Vail Foundation and the Stormont Vail Auxiliary. Any activity that involves the use of Foundation or Auxiliary resources or property for private use or benefit is prohibited. No Stormont Vail Health employee may utilize the Foundation, Auxiliary or any Stormont Vail Health name or identity for any fundraising activities not authorized by Stormont Vail Health. Stormont Vail Health also has a ***Solicitation for Contributions*** policy that provides guidelines limiting employee solicitation.

Non-Profit Tax Exempt Status

Employees shall not engage in any activity that involves the use of Stormont Vail Health resources or property for private use or benefit. Transactions entered into must be in the best interest of Stormont Vail Health and negotiated at arm's length for fair market value. Employees faced with situations that appear questionable should consult with their supervisors for guidance. Employees who suspect a violation of tax-exemption requirements should disclose the situation to the chief compliance officer.

Political Activity and Contributions

The 501(c)(3) tax-exempt status of Stormont Vail Health carries certain restrictions on political activities. There are limits on our legislative activities and we cannot participate in political campaigns. Participation in political campaigns or substantial legislative activity at local, state or federal levels could jeopardize our tax-exempt status. Below are some guidelines:

Prohibited actions for a tax-exempt organization include:

- Supporting or opposing a candidate for public office.
- Sponsoring a fund raiser or other event to support a candidate for public office.
- Contributing organizational funds or time to a candidate, a Political Action Committee (PAC) or a political party.
- Asking people within the organization to support or oppose a candidate or contribute to a campaign or PAC.
- Using organizational resources to seek support for or opposition to a candidate or a contribution to a PAC.

Prohibited actions for employees of a tax-exempt organization include:

- Asking people within the organization to support or oppose a candidate or contribute to a campaign or PAC.

Stormont Vail Health Funds and Assets

Stormont Vail Health assets include equipment, inventory, corporate funds or supplies and also include intangible assets such as concepts, business strategies and plans, financial data, intellectual property such as information technology, systems or processes developed in connection with Stormont Vail Health employment, or other confidential information about our business. Assets are to be used solely for Stormont Vail Health business. These assets may not be used to provide personal gain for one's self or for others. Team members may not sell or otherwise transfer any Stormont Vail Health assets to other persons or entities, except in the ordinary course of Stormont Vail Health business.

Trade Secrets and Confidential Information

It is very important for all team members to appropriately safeguard Stormont Vail Health's trade secrets and confidential information, and to refuse any improper access to trade secret and confidential information of any other company, including our competitors.

Guidelines for handling and the use of Stormont Vail Health's trade secrets, proprietary and confidential information include the following:

Any proprietary information to which Stormont Vail Health team members may have access should be discussed with others only on a need-to-know basis.

Any disclosure of proprietary information to any outside persons should be done only in conjunction with appropriate written trade secret or confidential information disclosure agreements. All team members must be alert to inadvertent disclosures that may arise in either social conversations or in normal business relations with our vendors and customers.

Intellectual Property

Whether expressed orally or in writing, confidential or proprietary information includes any information that is not generally disclosed, except as expressly authorized by management or requires by applicable laws or regulations, and that is useful or helpful to Stormont Vail Health or would be useful or helpful to competitors. Examples include:

- Financial information and other data including capital investment plans.
- Strategic planning or proprietary information including projects for individual projects or groups of projects, planned new projects or planned advertising programs, areas or services in which Stormont Vail Health is considering or intends to expand, change or improve.
- Intellectual property, special processes or manufacturing methods developed by or for Stormont Vail Health or utilizing Stormont Vail Health materials on company time resulting in a new development whether or not it is eligible for patent or copyright.
- Vendors, information and agreements including pricing, other terms and conditions, or status of negotiations.
- Patient or customer demographic information or data.
- Human resource data including but not limited to wage and salary data.
- Contemplated but unannounced changes in management or policies of the company.
- No-public information about Stormont Vail health assets and projects.
- Testing, research data and results.

Gifts or Gratuities

Stormont Vail Health team members may not accept gifts of cash or cash equivalents (e.g., VISA debit cards) under any circumstances from vendors, payers, patients or other customers of Stormont Vail Health, nor may they solicit non-cash gifts, gratuities or any other personal benefit or favor of any kind. If patient, patients' families or vendors doing or seeking to do business with Stormont Vail Health offer token or nominal, unsolicited gifts, they should be of promotional or advertising nature. We may never offer or accept gifts in exchange for patient referrals.

Q & A

Q: *I was offered a \$100 gift certificate from a drug rep as a “thank you” for giving him easy access to the physicians and having his drug prescribed on a regular basis. Am I allowed to accept the gift card?*

A: No. It is never acceptable to accept cash gifts (including cash equivalents) from anyone. It is also not acceptable to receive gifts of any kind for the purpose of influencing a decision. Instead, refer the representative to the Stormont Vail Foundation to make a charitable donation.

Vendor Transportation, Lodging, Entertainment and Meals

Vendors with whom Stormont Vail Health does business may offer transportation to and lodging at their business or other locations during the course of solicitation or in other business dealings. Such travel and lodging should be refused except in exceptional cases that are specifically approved by the chief compliance officer.

Stormont Vail Health team members may not encourage or solicit entertainment from any individual or company with whom Stormont Vail Health does business. From time to time, team members may offer or accept entertainment, but only if the entertainment is reasonable, occurs infrequently, and does not involve lavish expenditures. Offering or accepting entertainment that is not a reasonable adjunct to a business relationship, but is primarily intended to gain favor or influence, is not allowed.

Vendor and product representatives sometimes offer to provide meals or other food items to providers and staff in medical offices, groups and/or units. Consistent with guidelines for entertainment, this must be infrequent, not lavish and a reasonable adjunct to a business relationship.

In addition to all guidance provided throughout the Code of Conduct, we are responsible for adherence to Stormont Vail Health's **Vendor Policy** that provides more specific requirements.

Arrangements with Agents, Representatives and Consultants

Agreements with agents, sales representatives or consultants must clearly and accurately describe the services to be performed, the basis for earning the commission or fee involved, and the applicable rate or fee. Any such payments must be reasonable in amount, not excessive in light of the practice in the trade, commensurate with the value of the services rendered, and supported by appropriate documentation. The agent, sales representative, physician or consultant doing business with Stormont Vail Health must agree that the arrangement be disclosed as required by any federal or state law, regulation or program, with which Stormont Vail Health participates.

Payment to Government Employees

No payments of money, gifts, services, entertainment or anything of value may be offered or made available in any amount directly or indirectly, to any federal government official, employee, or any state official who regulated the business of Stormont Vail Health.

Other Improper Payments

No extra-contractual payments or offer of benefit of any kind may be made to vendors, physicians or other parties as an inducement for them to contract with Stormont Vail Health or for patient referrals. Stormont Vail Health prohibits the use of its funds or assets for any unlawful or unethical purpose. The making of any payment to a third party for any purpose other than that disclosed on the payment documentation is prohibited. Stormont Vail Health prohibits any form of bribery in connection with Stormont Vail Health business.



Accurate Books and Records

We all must understand that Stormont Vail Health cares how results are attained, and not just that they are attained. Stormont Vail Health requires candor and honesty from everyone in the performance of their respective responsibilities. This expectation applies to every type of Stormont Vail Health record – accounting, purchase order or contract, payroll, employees, payable, invoice expense reimbursement, etc. All team members are expected to adhere strictly to these standards and policies. Records should be transparent, meaning they should be clear and display information accurately. Good business practices, as well as certain federal and state laws require Stormont Vail Health to maintain books and records that accurately reflect the true nature of transactions and other information presented.

Similarly, Stormont Vail Health prohibits making improper entries or the lack of making proper entries to conceal activity. Everyone is to be honest and forthcoming with internal reviews and inquiries, as well as with internal and authorized external examiners or auditors. Outlined below are certain high profile areas where transparency is critically important.

Proper Accounting

Accounting team members are to design and utilize systems and policies to maintain honest and accurate records in all of our operations. It is against Stormont Vail Health policy, and possibly illegal, for any team member to cause our books and records to be inaccurate.

- Accounting systems and policies shall be established and maintained in accordance with generally accepted accounting principles, and will comply with all applicable federal and state laws and regulatory requirements
- Accounting systems shall include acceptable internal control mechanisms to assure the safeguarding of Stormont Vail Health assets, to provide reasonable assurance that transactions are executed in accordance with management's authorization, and to require that all transactions are properly recorded.

Medical Records, Coding and Billing Practices

All employees and professional staff involved with billing federal and/or state and/or state health care programs must be aware of fraud and abuse and high-risk areas. Billing practices, which result in overpayments from such programs, could constitute illegal federal or state false claims. Stormont Vail Health intends that all documentation supporting

claims submitted to federal health programs be for reasonable and necessary services, ordered by an appropriately licensed medical professional, and that claims submitted be complete and accurate. All team members involved in procedure charging, coding and patient registration and submission of claims must be educated in applicable federal or state insurance program requirements for the appropriate level of insurance/program reimbursement. We should never intentionally charge, code or bill for higher levels of services than provided and always bill consistent with the insurance program billing requirements. Similarly, any identified overpayments that result from mistaken, erroneous, improperly coded or otherwise overbilled claims, or payer errors must be returned to federal, state or other insurance programs within regulatory time constraints to avert potential assertions of reverse false claims.

Examples of unacceptable billing practices include, but may not be limited to, the following:

- Billing for items or services that were not:
 - Accurately documented in medical records;
 - Actually provided;
 - Appropriately ordered;
 - Rendered with appropriate professional supervision;
 - Coded the proper level of service;
 - Bundled where required by applicable payer regulations or rules;
- Submitting duplicate bills for an item or service;
- Filing false or inaccurate cost reports;
- Knowingly failing to report and promptly refund overpayments; Medicare and Medicaid require the report and refund of overpayments within 60 days.

Documentation Standards

A key part of our ethical and professional principles is documentation. Each employee is responsible for creating and maintaining accurate, complete and timely patient care records. Each team member must ensure that medical records do not contain false or misleading information and that they meet the requirement of all laws, regulations, Joint Commission standards and health system and hospital policies and procedures, including the medical staff bylaws.

Retention of Records

Legal and regulatory requirements mandate the retention of certain records for various periods of time, particularly in areas such as patient care, reimbursement, tax, employees, health and safety, environmental and contracts. Disposal or destruction of Stormont Vail Health records and files is not discretionary and must be done in accordance with Stormont Vail Health policies. In addition, when litigation or a government investigation or audit is pending, potentially relevant records must not be destroyed until the matter is closed. Stormont Vail Health prohibits the destruction of any records to avoid disclosure in a legal proceeding. Such activity may constitute a criminal offense. Refer to the Stormont Vail Health's **Document Retention Policy** and department specific policies for information on retention periods and restrictions.

Employee Relations

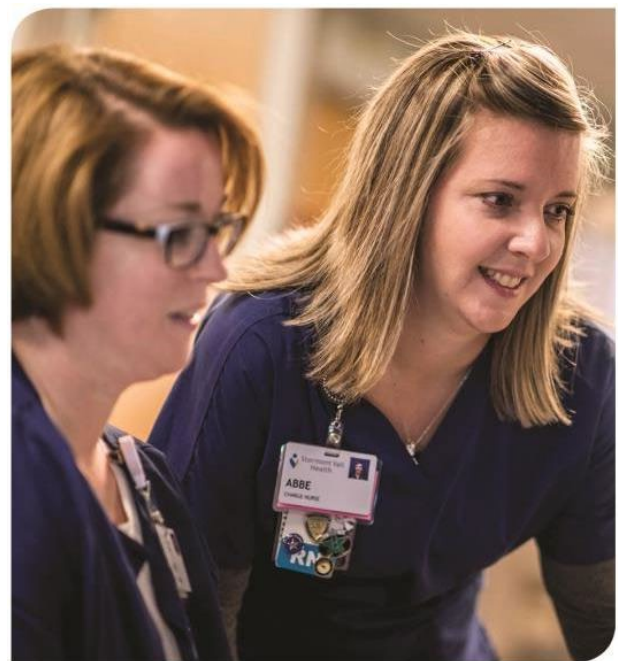
Stormont Vail Health has an **Equal Employment Opportunity at Stormont Vail Health** policy and adheres to the philosophy and practice of providing equal opportunities for all employees, and prospective employees, without regard to race, color,

religion, gender, national origin, age, marital status, veteran status, disability or genetic information.

Expense Reporting and Payroll

Stormont Vail Health team members who use the API system or submit expense records must do so completely, accurately and timely. When you use the time and attendance system you are indicating how you spent your work time. When you submit a documented expense report, you are guaranteeing that the expenses were for legitimate business on behalf of Stormont Vail Health or its affiliates.

Your supervisor or manager's signature on a payroll record or expense report confirms that it has been reviewed. It also confirms that the reported hours or expenses have been verified and correctly allocated.



Social Networking

Although social networking sites (SNS) are accessible at Stormont Vail Health, employees are expected to follow any Stormont Vail Health social networking site policies and act responsibly when posting information. **Posting patient information (whether on work time or off work) is strictly prohibited and is a HIPAA violation.**

While using online social media tools, employees may be subject to all aspects of this Code of Conduct, Stormont Vail Health policies and procedures, and standards of excellence. Consequently, the utmost of appropriate, professional conduct is expected. Team members shall not engage in personal, abusive attacks on fellow employees, clients, patients, vendors or Stormont Vail Health.

Safety, Health and Environment

In the United States, regulatory agencies exist under federal, state or local jurisdiction to ensure compliance with laws and regulations affecting safety, health and environmental protection. It is Stormont Vail Health's policy to comply with both the letter and the spirit of the laws and regulations imposed by these agencies and to attempt to develop a cooperative attitude with inspection and enforcement team members from the agencies. In keeping with this spirit, team members are encouraged to report conditions that they perceive to be unsafe, unhealthy or hazardous to the environment.

Drugs and Alcohol, Tobacco and Related Products

Stormont Vail Health prohibits the use, possession, consumption, sales or purchase of any illegal drugs or alcohol on Stormont Vail Health property. Under

certain circumstances, alcohol may be approved by the Chief Executive Officer in conjunction with a meeting or event held on Stormont Vail Health premises.

At work, you may have access to drugs and controlled substances. All drugs and controlled substances must be handled carefully and in strict compliance with all laws, policies and regulations. If you suspect that prescription drugs or controlled substances are being taken from your department or misused, you must notify your supervisor or manager, Risk Management office, Integrity & Compliance Department, or call the Stormont Vail Ethics and Compliance Reporting Line.

If a supervisor or manager has reason to suspect a Stormont Vail Health team member is under the influence of drugs or alcohol while at work or on Stormont Vail Health premises, that person may be required to submit to an alcohol or drug test, searches, referral to Employee Assistance Program and/or disciplinary action. This is a condition of employment, and failure to comply with these requests is grounds for corrective action up to and including termination.

Stormont Vail Health is required to adhere to various federal, state, and local laws and regulations regarding alcohol and drug use. Stormont Vail Health also has a vital interest in maintaining a safe, healthy and efficient environment for its employees and the public. Being under the influence of, subject to the effects of, or impaired by alcohol or a drug while on the job may pose serious safety and health risks to the user, the user's coworkers and the public. Additionally, the possession, use or sale of an illegal drug in the workplace may pose an unacceptable risk to the safe, health and efficient operations of Stormont Vail Health.

Stormont Vail Health also prohibits the use of any tobacco products or the use of electronic cigarettes in and on all Stormont Vail Health properties including grounds, parking lots, parking structures and sidewalks within property boundaries. Stormont Vail Health team members are encouraged to communicate this policy with courtesy to patients and families. Additionally, Stormont Vail Health team members are expected to be free from the smell of smoke.

Workplace Environment

Stormont Vail Health strives to maintain a safe, healthy and efficient environment that is free from any form of harassing or threatening behavior. Harassment and violence are strictly prohibited (which is described in more detail in Stormont Vail Health human resources policies). Employees are expected to treat each other, customers, vendors and visitors with respect through courteous communication and professional demeanor. Workplace violence may include robbery and other commercial crimes, stalking, inappropriate or unwelcome physical contact, threats, terrorism and hate crimes. Stormont Vail Health employees may not have firearms, weapons, explosive devices or other dangerous materials on Stormont Vail Health premises except for those employees/positions specifically exempted from this policy. Stormont Vail Health employees who see or experience harassment or violence should report it to their supervisor or manager, Employee Relations, the Integrity & Compliance Department, the SV Ethics and Compliance Reporting Line or Security. All Stormont Vail Health team members have the right not to be subjected to discrimination as described in the **Equal Employment and Antidiscrimination Statement** as well as the **Americans with Disabilities Act**.

Computer System and Email Usage

The following principles apply to all Stormont Vail Health computers and systems:

- All computers, software and related systems are company property and should be used for business purposes only.
- Use computers and systems in an effective, ethical and lawful manner. User accounts may be audited.
- Use only computers and systems you are authorized to use, whether they are at Stormont Vail Health location or another location tied to Stormont Vail Health through a network.
- Take all reasonable steps to protect the integrity and privacy of Stormont Vail Health computers, systems, software, information and data. In particular, users must not share their
- Follow Stormont Vail Health's policies for email, internet, social media and other computer use.
- Respect the privacy of others, including in email, computer files and data transmission.
- Refrain from using Stormont Vail Health computers for any unauthorized activities or illegal purposes.

Stormont Vail Health prohibits the use of any information system in ways that are disruptive, offensive, harmful to morale, or which could constitute unlawful acts. Employees should refer to the Stormont Vail Health policy manager for a full outline of computer system and email usage policies.

Patient Rights

We must at all times treat patients with care, concern and respect. Care should be provided economically in a manner consistent with maintaining quality.

Patients are entitled to a complete disclosure of all charges. Patients must be informed of their right of self-determination, which refers to the ability of competent adults to participate in and make their own health care decisions after receiving, from the physicians, appropriate disclosure of their diagnosis, prognosis and treatment alternatives. A patient has the right to accept medical care or to refuse treatment to the extent permitted by law and to be informed of the medical consequences of such refusal. We must not discriminate against patients based on whether they exercise their right to self-determination or on the substance of their specific health care decisions.

Treatment of patient shall be consistent with appropriate informed consent as determined by Kansas law. Questions concerning a patient's competence or the right of another person to act on a patient's behalf should be handled in accordance with Stormont Vail Health policy titled ***Authorization and Consent***.

Advance Directives and Health Care Decisions

During admission, Stormont Vail Health staff and physicians will discuss and address with patients their right in making healthcare decisions. This includes the right to accept or refuse medical treatment and have advance directives (e.g. CPR Directive, Do Not Resuscitate, Living Will, etc.). This information is governed by ethical and legal rules.

It will be noted in the medical record whether a patient has an advance directive, including the location of the directive and its provision, if known. Oral instructions will also be noted in the record. A reasonable effort should be made to obtain a copy of advance directives to be placed in the medical record.

Our hospital will provide a packet of information regarding advance directives to all patients admitted to the hospital. We do not discriminate against patients based on whether they have advance directives. It is vital to follow the law and health system policies related to advance directives and patient self-determination instructions.

Emergency Medical Treatment and Labor Act (EMTALA)

Stormont Vail Health has adopted a policy titled ***Emergency Medical Treatment and Labor Act (EMTALA) Screening, Treatment, Transfer and On-Call Roster***. Stormont Vail Health shall comply with federal law by providing, within its capabilities, to each person who comes to the Emergency Department, an appropriate medical screening examination to determine whether the individual has an emergency medical condition and to provide necessary stabilizing treatment, or arrange for the proper transfer of such person to a medical facility possessing the necessary treatment options required for the patient, regardless of the individual's ability to pay, race, color, national origin, age, sex, religion or disability.

We are each responsible for understanding and fulfilling our responsibilities for compliance with EMTALA. If you have questions, please contact the Integrity & Compliance department.

Marketing

Any marketing program developed and implemented by Stormont Vail Health to the community at large will abide by Stormont Vail Health's ethical standards. Marketing programs will reflect truth in advertising and will factually represent those services and programs. Stormont Vail Health may use advertising to inform the community of the availability and the value of our services and products and to inform the public of Stormont Vail Health's views on public policy issues related to health care. Stormont Vail Health is perceived by the community as a reliable, authoritative source of information about medical care and the health care industry. We should remain mindful of the trust placed in us by the public and strive to provide accurate and balanced information. Advertisements that make health or safety claims must be supported by tests or studies approved by experts in the appropriate field. Advertisements must be fair. Any immoral, unethical, or unscrupulous behaviors found in an organization's promotions or advertisements may be a violation of the law.

Any promotional activity, including marketing, physician relations and public relations endeavors related to Stormont Vail Health, will be based upon actual programs, services and operations, and will be presented truthfully. All activities that represent Stormont Vail Health are presented to the public in accordance with ethical and acceptable business practices. If you have any questions regarding marketing activities, please contact the Marketing & Communications department.

Copyright Laws

Copyright laws are relevant to Stormont Vail Health in two different ways:

Copyright infringement occurs when you copy an author's protected work without his or her consent.

Copyright protection is needed when you want to protect or copyright your own work.

Except as permitted by law, you will not reproduce or use any copyrighted materials without the express permission of the copyright holder, unless licensed under an agreement. Copyrights apply to such things as articles, photographs, artwork, books, movies, computer software and advertising. The unauthorized copying and reproduction of any copyrighted materials is not allowed. It is your responsibility to obtain permissions to reproduce copyrighted materials before reproduction.



Q: I found an article in a magazine that I think would be helpful to other people in my department. Can I make a copy of this and pass it out to staff?

A: The "fair use" exception may allow you to make a copy of the article or publication for education purposes. Before making a copy of the article, please check with the magazine regarding copyright permission. Most magazines include a phone number to call for photocopying. If you are still uncertain, call the Stormont Vail Health Integrity & Compliance department.

Clinical Research Laws and Ethics

Any medical staff member, employee or Stormont Vail Health Institutional Review Board (SVIRB) member who deals with clinical research must:

Understand the principles and laws that govern medical research, investigations and clinical trials;

Maintain a working knowledge of Stormont Vail Health Institutional Review Board and other research-related policies and procedures including but not limited to ***Stormont Vail Health Human Research Subject Protections Program***;

Conduct research, investigations and trials in compliance with all applicable laws, and Stormont Vail Health and SVIRB policies and procedures.



Fiduciary Duties of the Board of Directors and Officers

Stormont Vail Health acts through a board of directors that makes policy decisions by adopting provisions in the corporate bylaws or through

actions at board of directors' meetings, such as the adoption of this Code. The directors do not carry out the day-to-day management of Stormont Vail Health; that function is delegated to the president and members of the Operating Committee.

Directors and officers have a fiduciary duty to Stormont Vail Health. The directors and officers are required to exercise good faith and to use their powers in the interests of Stormont Vail Health. When an individual accepts the position of director or officer, he or she commits to give diligent attention to the organization's concerns and to be faithful and honest in the discharge of his or her duties. To carry out its primary functions, the board is charged with obligations and duties in overseeing the business conduct and ethical standards of Stormont Vail Health.

The officers of Stormont Vail Health also have the fiduciary responsibility to act on behalf of Stormont Vail Health and not to act individually. The management of Stormont Vail Health will be conducted by or under the supervision of senior officers as designated by the board. The bylaws outline the duties, activities and obligations of the officers.

The authority and duties of the senior officers are those that are delegated from the board of directors, and the management function will be vested in the principal senior officers.

In performing their management function, the officers are obligated to act in a manner consistent with the standards of Stormont Vail Health, to execute specific plans, policies or directions of the board, and to work with and on behalf of the board to require that every director, officer and employee comply with this Code and the Integrity & Compliance Program.

SV Ethics and Compliance Reporting Line



Getting Help and Reporting Violations

When you have ethics or compliance questions or need more information, feel free to contact your supervisor or manager, the Employee Relations department or the Integrity & Compliance department. You may also read the Stormont Vail Health policies for more detailed information. Ethics and compliance concerns will be kept confidential whenever possible. There are instances, however, such as an official investigation, patient or staff safety concerns, etc., where we are not able to maintain confidentiality.

We have implemented a confidential, external reporting line to allow you to present an ethics or compliance concern anonymously. The SV Ethics and Compliance Reporting Line may be used to report possible violations to this Code of Conduct, the Integrity & Compliance Program, Stormont Vail Health policies and procedures, and other laws and regulations.

Every Stormont Vail Health team member must report suspected violations of the Code of Conduct to their supervisor or manager, senior manager, the Integrity & Compliance department or the SV Ethics and Compliance Reporting Line. We will notify you if it becomes necessary to reveal your identity in an official investigation.

Stormont Vail Health protects all employees against retaliation for reporting Code of Conduct violations or participating in investigations. Penalties for retaliatory behavior can be severe.

833-SVH-Up2U
Up2U.ethicspoint.com
compliance@stormontvail.org



Q: I have been with Stormont Vail Health for a long time. Even though the reporting line is confidential, could the operators recognize my voice?

A: An outside service is used to answer all calls made to the reporting line. The person answering the phone is not a Stormont Vail Health team member.

How do I Access Stormont Vail Health Policies?

Stormont Vail Health policies and procedures are available on SVnet.

The board of directors has approved this Code of Conduct.

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Stormont Vail Health