



SYSTEM POLICY

Category: Compliance

Policy #: PH-060-0005

Policy Title: Code of Conduct

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Executive Owner: VP, Chief Compliance Officer

Original Policy Date: 04/30/2014

Current Effective Date: 09/21/2015

Last Review Date: 09/21/2015

Next Required Review Date: 09/21/2017

Policy Applies To: All Presence Health System Associates and Entities (Presence Health Hospitals; Presence Health Partners; Presence Life Connection; Presence Medical Group)

I. POLICY STATEMENT

Presence Health is committed to maintaining a work environment and relationships with our patients, colleagues, hospital members and the community at large that promotes compliance with law and ethical business standards. Compliance is the responsibility of all Presence Health employees and contracted professionals/staff ("Presence Personnel"). Presence Health has adopted this Code of Conduct to guide ethical behavior and legal compliance for all Presence Health Personnel.

II. PURPOSE

This Code of Conduct provides guidance on employee and organizational responsibilities related to compliance by setting forth standards of behavior related to business ethics, integrity, conflicts of interest, confidentiality, financial relationships, and other critical areas.

III. MISSION AND VALUE RATIONALE

To advance our values of Honesty, Oneness, People and Excellence, Presence Health is committed to conducting its business ethically and in conformance with all federal and state laws, regulations as reflected in this Code of Conduct.

IV. PROCEDURE

- A. Provide Quality Patient Care and Support Services. Presence Personnel are expected to provide quality patient care and support services to all patients, residents, family, caregivers and the public at large with respect and kindness. All treatment decisions must be based on medical necessity and be in the best interest of the patient.
- B. No Discrimination or Harassment. Discrimination against any person because of age, race, color, religion, gender, sexual orientation, disability, national origin or for any other legally protected category is strictly prohibited. Harassment based on any of these characteristics (including sexual harassment) may be a form of discrimination and will not be tolerated.

- C. Protect Confidential Information. Presence Health is committed to maintaining the confidentiality of patient, personnel and proprietary business information in accordance with applicable legal and ethical standards and internal policies. Presence Personnel must not access, disclose or discuss with either internal or external parties, any private patient or confidential or proprietary business information, except to the extent necessary to the performance of their jobs.
- D. Compliance with Health Care Fraud and Abuse Laws. All Presence Personnel are required to comply with laws that prohibit health care fraud and abuse. In particular, Presence Personnel must not:
1. Offer, provide, solicit or accept cash, gifts or other inducements in exchange for referrals or business in general.
 2. Intentionally or knowingly make false or fraudulent claims for payment or assist anyone else in doing so.
 3. Document false information for the purpose of enabling Presence Health or any other health care provider to obtain higher reimbursement for services, including by documenting a need for services that are not medically necessary, documenting care that was not actually rendered or otherwise upcoding, unbundling or mischaracterizing the services provided to a patient/resident.
- E. No Attempt to Improperly Influence Government Representatives. Presence Personnel shall not offer, promise, authorize or give any bribe, payment, gift or other thing of value with the intent of influencing any political official or government employee in the discharge of that person's responsibilities.
- F. Keep Accurate and Complete Records. It is essential that Presence Health maintain accurate, complete and legible records. Presence Health Personnel must not knowingly, or with reckless disregard for the truth, make any false or misleading statement on any form or record, electronic or otherwise. All patient record entries must accurately and clearly report the patient's condition and the care delivered, and otherwise complies with all applicable laws, payor requirements and internal policy.
- G. Appropriate Use of Assets. Presence Personnel shall not misappropriate, steal or engage in the unauthorized use of company property or funds. Presence Personnel are expected to use company assets wisely to protect against their loss, theft or misappropriation by others. Presence Health computers and Internet access should only be used for work-related purposes and not for personal use.
- H. Professional Behavior. All Presence Personnel are expected to act in a professional manner at all times and to be honest in their dealings with co-workers, patients, family members and caregivers.

- I. Conflict of Interest. Presence Personnel are expected to avoid or disclose any conflicts of interest or situations which may give the appearance of a conflict of interest. Conflicts of interest occur when personal interests or activities present a conflict with a person's duty to act in the best interest of Presence Health. Conflicts of interest may arise from many sources including personal financial interests of Presence Personnel or a family member; service, employment or consulting arrangements with a Presence Health competitor; the receipt of gifts from vendors or others with whom Presence Health entities do business; or use of Presence Health resources to benefit an outside interest or a personal interest.
- J. Disclosure of Conflicts of Interest or Potential Conflicts: Presence Personnel must disclose in advance actions or relationships that could present a conflict of interest according to the policies of Presence Health and its organizations. System and Ministry officers, senior managers, researchers and certain other key Presence Personnel are required to complete and submit a conflict of interest disclosure form annually. In most instances, and when faced with or becoming aware of a possible conflict of Interest, Presence Personnel must either complete and submit a conflict of interest disclosure form and/or seek the approval of a supervisor and/or the Chief Compliance Officer before any further action is taken. Once reported, Presence Personnel should withdraw from any decision-making function with regards to the possible conflict. For more specific guidance, Presence Personnel should refer to the System Conflict of Interest policy and consult with the Chief Compliance Officer and/or a System Attorney.
- K. Receipt of Gifts. In general, Presence Health discourages Presence Personnel from giving and/or accepting gifts, entertainment, meals and/or any other consideration paid to or by suppliers, other business partners and/or potential referral sources to avoid any appearance of a Conflict of Interest. In the limited circumstances allowed, any entertainment, gift or token of appreciation involving potential referral resources, business partners, contractors, physicians or other persons who are in a position to refer patients to Presence Health must be undertaken in accordance with corporate policies, which have been developed consistent with federal laws, regulations, and rules regarding these practices. Presence Personnel should consult organizational policies prior to extending and/or receiving any business courtesy to and/or from a potential referral source or a business partner. For more specific guidance, refer to the System Conflict of Interest policy.
- L. Non-Retaliation. No individual shall be discriminated or retaliated against in any manner for reporting a suspected violation of law if reported in good faith.
- M. Compliance Program Participation. All Presence Personnel must abide by the Presence Health Compliance Program by:
 1. Completing all assigned online or other compliance training and compliance certifications.
 2. Complying with this Code of Conduct and all legal requirements and compliance policies.

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3. Reporting all suspected non-compliance with this Code of Conduct, internal compliance and/or regulatory policies and procedures or applicable law to any of the following:
 - To the Presence Health Chief Compliance Officer via interoffice or regular mail at:

Vice President, Chief Compliance Officer
Presence Health
200 S. Wacker Drive, 12th Floor
Chicago, IL 60606
 - Contacting the Chief Compliance Officer at 312-308-3279 or the Regional Compliance Officer for the region in question.
 - Calling the Compliance Line (855)-737-3755 or reporting online at www.presencehealth.ethicspoint.com. Reports made through the Compliance Line may be made anonymously.
4. Seeking guidance from the Chief Compliance Officer or a System attorney before acting whenever there is a question or concern about whether a potential course of action presents compliance concerns.
5. Cooperating in any investigation of potential non-compliance.
6. Refraining from any form of retaliation against persons who report, investigate or cooperate in the investigation of suspected non-compliance.

V. IMPLEMENTATION FORMS AND OTHER DOCUMENTS

None

VI. RELATED SYSTEM OR MINISTRY POLICIES

Non-Retaliation Policy