



Code of Conduct

September 20, 2018

Approved: 2011
Revised: April 2, 2014
September 20, 2018

Table of Contents

Purpose	26
Core Values.....	26
Our Vision.....	26
Purpose of Our Code of Conduct.....	26
Leadership Responsibilities.....	27
Relationships with Our Healthcare Partners	27
Patient Care and Rights	27
Clinical Decisions.....	28
Emergency Treatment.....	28
Patient Information	28
Third-Party Payers	28
Coding and Billing for Services	28
Cost Reports.....	29
Regulatory Compliance	29
Dealing with Accrediting Bodies	30
Business Information and Information Systems.....	30
Accuracy, Retention, and Disposal of Documents and Records	30
Confidential Information.....	30
Electronic Media	31
Financial Reporting and Records	31
Workplace Conduct and Employment Practices.....	31
Conflict of Interest	31
Controlled Substances.....	32
Copyrights.....	32
Diversity and Equal Employment Opportunity	32
Harassment and Workplace Violence.....	32
Health and Safety.....	33
License and Certification Renewals	33
Personal Use of N.S.H.C. Resources.....	33
Relationships among N.S.H.C. Employees	33
Relationships with Suppliers, and Educational Institutions	33
Research	34
Substance Abuse and Mental Acuity	34
Environmental Compliance	35
Compliance Program and Structure	35
Program Structure.....	35
Resources I'm Guidance and Reporting, Violations	35
Personal Obligation to Report.....	35
Internal Investigations of Reports	35
Corrective Action	36
Discipline	36
Internal Audit and Other Monitoring	36
Acknowledgement Process	36
NSHC Code of Conduct Acknowledgement and Agreement	37

Purpose: Providing quality health services and promoting wellness within our people and environment.

Core Values: From our history to date and from the commitments we all share now about future, we have defined the values that should guide all our activities and staff in the years to come. These are our core values:

INTEGRITY

CULTURAL SENSITIVITY AND RESPECT FOR TRADITIONAL VALUES

ALWAYS LEARNING AND IMPROVING

COMPASSION

TEAMWORK

PRIDE

Our Vision: By 2015, we will excel in tribally governed health care delivery systems globally.



PURPOSE OF OUR CODE OF CONDUCT

The Code of Conduct provides guidance to all NSHC employees and assists us in carrying out our daily activities within appropriate ethical and legal standards. These obligations apply to our relationships with patients, physicians, third-party payers, independent contractors, vendors, consultants, and one another.

The Code is a critical component of our overall Ethics and Compliance Program. We have developed the Code to ensure we meet our ethical standards and comply with applicable laws and regulations.

The Code is intended to be a statement that is comprehensive and easily understood. In some instances, the Code deals fully with the subject covered. In many cases, however, the subject discussed has so much complexity that additional guidance is necessary for those directly involved with the particular area to have sufficient direction.

Though we promote the concept of management autonomy at local facilities in order to meet local needs, the policies set forth in this Code are mandatory and must be followed.

LEADERSHIP RESPONSIBILITIES

While all NSHC employees are obligated to follow our Code, we expect our leaders to set the example, to be in every respect a model. They must ensure that those on their team have sufficient information to comply with law, regulations, and policy; as well as the resources to resolve ethical dilemmas. They must help to create a culture within NSHC, which promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to raise concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objective.

RELATIONSHIPS WITH OUT HEALTHCARE PARTNERS

Patient Care and Rights

Our mission is to provide quality healthcare to all our patients. We treat all patients with respect and dignity and provide care that is both necessary and appropriate. We make no distinction in the admission, transfer or discharge of patients or in the care we provide based on race, color, religion, or national origin. Clinical care is based on identified patient healthcare needs, not on patient or organizational economics.

Upon admission, each patient is provided with a written statement of patient rights. This statement includes the rights of the patient to make decisions regarding medical care and conforms to all applicable state and Federal laws.

We assure patient's involvement in all aspects of their care and obtain informed consent for treatment. As applicable, each patient or patient representative is provided with a clear explanation of care including, but not limited to, diagnosis, treatment plan, right to refuse or accept care, care decision dilemmas, advance directive options, estimates of treatment costs, organ donation and procurement, and an explanation of the risks and benefits associated with available treatment options. Patients have the right to request transfers to other facilities. In such cases, the patient will be given an explanation of the benefits, risks, and alternatives.

Patients are informed of their right to make advance directives. Patient advance directives will be honored within the limits of the law and the organization's mission, philosophy, and capabilities.

Patients and their representatives will be accorded appropriate confidentiality, privacy, security and protective services, opportunity for resolution of complaints, and if requested, pastoral counseling. Any restrictions on a patient's visitors, mail, telephone, or other communications must be evaluated for their therapeutic effectiveness and fully explained to and agreed upon by the patient or patient representative during prolonged stays in the facility, patients have the right to refuse to perform tasks in or for the facility.

Patients are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care. NSHC employees will receive training about patient rights in order to clearly understand their role in supporting them.

Compassion and respect are part of our commitment to the communities we serve. We strive to provide health education, health promotion, and illness prevention programs as a part of our efforts to improve the quality of life of our patients and their communities.

Clinical Decisions

The clinical decisions that are made by medical providers will follow ethical standards and will not be influenced by reimbursement or financial incentives. These decisions will be upheld regardless of the hospital's compensation or financial relationship with the medical provider.

Emergency Treatment

We follow the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing emergency medical treatment to all patients, regardless of to pay. Anyone with an emergency medical condition is treated and admitted based on medical necessity. In an emergency situation, financial and demographic information will be obtained only after the immediate needs of the patient are met. We do not admit or discharge patients simply on their ability to pay.

Patients will only be transferred to another facility if the patient's medical needs cannot be met at the Norton Sound Regional Hospital (NSRH) facility and appropriate care is knowingly available at another facility. Patients may only be transferred after they have been stabilized and are formally accepted by the alternate facility.

Patient Information

We collect information about the patient's medical condition, history, medication, and family illnesses to provide the best possible care. We realize the sensitive nature of this information and are committed to maintaining its confidentiality. We do not release or discuss patient-specific information with others unless it is necessary to serve the patient or required by law.

NSHC employees must never disclose confidential information that violates the privacy rights of our patients. No NSHC employee has a right to any patient information other than that necessary to perform his or her job.

Patients can expect that their privacy will be protected, and that patient specific information will be released only to persons authorized by law or by the patient's consent. In an emergency, when requested by an institution or physician then treating the patient, the patient's consent is not required, but the name of the institution and the person requesting the information must be verified. This should be done as a call back process.

THIRD-PARTY PAYERS

Coding and Billing for Services

We will take great care to assure that all billings to government and to private insurances payers reflect truth and accuracy and conform to all pertinent Federal and state laws and regulations. We prohibit any employee or agent of NSHC from knowingly presenting or causing to be presented claims for payment or approval, which are false, fictitious, or fraudulent.

We will operate oversight systems designed to verify that claims are submitted only for services actually provided and that services are billed as provided. These systems will emphasize the critical nature of complete and accurate documentation of services provided. As part of our documentation effort, we will maintain current and accurate medical records.

Any subcontractors engaged to perform billing or coding services must have the necessary skills, quality assurance processes, systems, and appropriate procedures to ensure that all billings for government and commercial insurance programs are accurate and complete. NSHC prefers to contract with such entities that have adopted their own ethics and compliance programs. Third-party billing, entities, contractors, and preferred vendors that we consider must be approved consistent with the corporate policy on this subject.

Cost Reports

Our business involves reimbursement under government programs, which require the submission of certain reports of our costs of operation. We will comply with Federal and state laws relating to all cost reports. These laws and regulations define what costs are allowable and outline the appropriate methodologies to claim reimbursement for the cost of services provided to program beneficiaries. Given their complexity, all issues related to the completion and settlement of cost reports must be coordinated through our Finance Department.

REGULATORY COMPLIANCE

NSHC provides varied healthcare services in many sites. These services shall be provided only pursuant to appropriate Federal, state, and local laws and regulations. Such laws and regulations may include subjects such as certificates of need, licenses, permits, accreditation, access to treatment, consent to treatment, medical recordkeeping, access to medical records and confidentiality, patient's rights, terminal care decision-making, medical staff membership and clinical privileges, and Medicare and Medicaid regulations. The organization is subject to numerous other laws in addition to these healthcare regulations.

We will comply with all applicable laws and regulations, including the Trafficking Victims Protection Act of 2000, section 106(g) as amended. All employees, medical staff members, and contract service providers must be knowledgeable about and ensure compliance with all laws and regulations: and should immediately report violations or suspected violations to a supervisor or member of management and Compliance Officer.

NSHC will be forthright in dealing with any billing inquiries. Requests for information will be answered with complete, factual, and accurate information. We will cooperate with and be courteous to all government inspectors and provide them with the information to which they are entitled during an inspection.

During a government inspection, you must never conceal, destroy, or alter any documents, lie, or make misleading statements to the government representative. You should not attempt to cause another employee to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law.

In order to ensure that we fully meet all regulatory obligations, NSHC employees must be informed about stated areas of potential compliance concern. The Department of Health and Human Services, and particularly its Inspector General, has routinely notified healthcare providers of areas in which these government representatives believe that insufficient attention is being accorded government regulations. We should be diligent in the face of such guidance about reviewing these elements of our system to ensure their correctness. NSHC will provide its employees with the information and education they need to comply fully with all applicable laws and regulations.

DEALING WITH ACCREDITING BODIES

NSHC will deal with all accrediting bodies in a direct, open, and honest manner. No action should ever be taken in relationships with accrediting bodies that would mislead the accreditor or its survey teams, either directly or indirectly.

The scope of matters related to accreditation of various bodies is extremely significant and broader than the scope of this Code of Conduct. The purpose of our Code of Conduct is to provide general guidance on subjects of wide interest within the organization. Accrediting bodies may be focused on issues both of wide and somewhat more focused interest. In any case, where NSHC determines to seek any form of accreditation, obviously all standards of the accrediting group are important and must be followed.

BUSINESS INFORMATION AND INFORMATION SYSTEMS

Accuracy, Retention, and Disposal of Documents and Records

Each NSHC employee is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements but also to ensure that records are available to defend our business practices and actions. No one may alter or falsify information on any record or document.

Medical and business documents and records are retained in accordance with the law and our record retention policy. Medical and business documents include paper documents such as letters and memos, computer-based information about the organization or its business activities. It is important to retain and destroy records appropriately according to our policy. You must not tamper with records, nor remove or destroy them prior to the specified date.

CONFIDENTIAL INFORMATION

Confidential information about our organization's strategies and operations is a valuable asset. Although you may use confidential information to perform your job, it must not be shared with others outside of NSHC or your department, unless the individuals have a legitimate need to know this information and have agreed to maintain the confidentiality of information. Confidential information includes personnel data, research data, techniques,

employee lists and data maintained by the organization, supplier and subcontractor information, and proprietary computer software.

This provision does not restrict the right of an employee to disclose, if he or she wishes, information about his or her own compensation, benefits or terms and conditions of employment.

Electronic Media

All communications systems, electronic mail, intranet, internet access, or voice mail are the property of the organization and are to be primarily used for business purposes. Limited responsible personal use of the NSHC communications systems is permitted; however, you should assume that these communications are not private. Patient or confidential information should not be sent through the Internet until such time that its confidentiality can be assured.

NSHC reserves the right to periodically access, monitor, and disclose the contents of, email, and voice mail messages.

Employees may not use internal communication channels or access to the Intranet to post, store, transmit, download, or distribute any threatening; knowingly, recklessly, or maliciously false; or obscene materials including anything constituting or encouraging a criminal offense, giving rise to civil liability, or otherwise violating any laws. Additionally, these channels of communication may not be used to send chain letters, or copyrighted documents that are not authorized for reproduction; nor are they to be used to conduct a job search or open misaddressed mail.

Employees who abuse our communications systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action.

Financial Reporting and Records

We have established and maintained 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, payers, colleagues, 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. NSHC 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.

WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES

Conflict of Interest

A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract you

from the performance of your responsibilities at NSHC. If you have any questions about whether an outside activity might constitute a conflict of interest, you must obtain approval of a corporate officer before pursuing moonlighting activities.

Controlled Substances

Some of our employees routinely have access to prescription drugs, controlled substances, and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations and must be administered by specific regulatory organizations and must be administered by physician order only. It is extremely important that these items be handled properly and only by authorized individuals to minimize risks to us and to patients. If you become aware of the diversion of drugs from the organization, you should report the incident immediately.

Copyrights

NSHC employees may only make copies of copyrighted materials pursuant to the organization's policy on such matters.

Diversity and Equal Employment Opportunity

Our employees provide us with a wide complement of talents, which contribute greatly to our success. We are committed to providing an equal opportunity work environment where everyone is treated with fairness, dignity, and respect. We will comply with all laws, regulations, and policies related to nondiscrimination in all of our personnel actions. Such actions include hiring, staff reductions, transfers, terminations, evaluations, recruiting, compensation, corrective action, discipline, and promotions.

No one shall discriminate against any individual with a disability with respect to any offer, or term or condition, of employment. We will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities.

Harassment and Workplace Violence

Each NSHC employee has the right to work in an environment free of harassment. We will not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace.

Any form of sexual harassment is strictly prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment.

Harassment also includes incidents of workplace violence. Workplace violence includes robbery and other commercial crimes, stalking cases, violence directed at the employer, terrorism, and hate crimes committed by current or former employees. As part of our commitment to a safe workplace for our employees, we prohibit employees from possessing firearms, other weapons, explosive devices, or other dangerous materials on NSHC premises. Employees who observe or

experience any form of harassment or violence should report the incident to their supervisor, the Human Resources Department, or Compliance Officer.

Health and Safety

All NSHC facilities must comply with all government regulations and rules and with NSHC policies or required facility practices that promote the protection of workplace health and safety. Our policies have been developed to protect you from potential workplace hazards. You should become familiar with and understand how these policies apply to your specific job responsibilities and seek advice from your supervisor or the Safety Officer whenever you have a question or concern. It is important for you to advise your supervisor or the Safety Officer of any serious workplace injury or any situation presenting a danger of injury so that timely corrective action may be taken to resolve the issue.

License and Certification Renewals

Employees and individuals, retained as independent contractors, in positions which require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with Federal and state requirements applicable to their respective disciplines. To assure compliance, NSHC requires the individual having a current license to send a copy of current license to the Human Resources Department.

NSHC will not allow any employee or independent contractor to work without valid, current licenses or credentials.

Personal Use of NSHC Resources

It is the responsibility of each NSHC employee to preserve our organization's assets including time, materials, supplies, equipment, and information. Organization assets are to be maintained for business related purposes. As a general rule, the personal use of any NSHC asset without the prior approval of your supervisor is prohibited. The occasional use of items, such as copying facilities or telephones, where the cost to NSHC is insignificant, is permissible. Any community or charitable use of organizational use of resources must be approved in advance by your supervisor. Any use of organization resources for personal financial gain unrelated to NSHC's business is prohibited.

Relationships Among NSHC Employees

In the normal day-to-day functions of an organization like NSHC, there are issues that arise which related to how people in the organization deal with one another. It is impossible to foresee all of these, and many do not require explicit treatment in a document like this. A few routinely arise, however. One involves gift giving among employees for certain occasions. While we wish to avoid any strict rules, no one should ever feel compelled to give a gift to anyone in a supervisory role that would clearly violate organization policy.

Relationships with Suppliers and Educational Institutions

We must manage our suppliers' relationships in a fair and reasonable manner, consistent with all applicable laws and good business practices. We promote competitive procurement to the

maximum extent practicable. Our selection of suppliers and vendors will be made on the basis of objective criteria; including quality, technical excellence, price, delivery, adherence to schedules, service, and maintenance of adequate sources of supply. Our purchasing decisions will be made on the supplier's ability to meet our needs, and not on personal relationships and friendships. We will always employ the highest ethical standards in business practices in source selection, negotiation, determination of contract awards, and the administration of all purchasing activities. We will not communicate to a third-party confidential information given to us by our suppliers unless directed in writing to do so by the supplier. We will not disclose contract pricing and information to any outside parties.

Research

We will follow high ethical standards in any research conducted by our physicians and professional staff. We do not tolerate intentional research misconduct. Research misconduct includes making up or changing results or copying results from other studies without performing the research.

All patients asked to participate in a research project are given a full explanation of alternative services that might prove beneficial to them. They are also fully informed of potential discomforts and are given a full explanation of the risks, expected benefits, and alternatives. The patients are fully informed of the procedures to be followed, especially those that are experimental in nature. Refusal of a patient to participate in a research study will not compromise their access to services.

All personnel applying for or performing research of any type are responsible for maintaining the highest ethical standards in any written or oral communications regarding their research projects as well as following appropriate research guidelines. As in all accounting and financial record keeping, our policy is to submit only true, accurate, and complete costs related to research grants.

Substance Abuse and Mental Acuity

To protect the interests of our employees and patients, we are committed to an alcohol and drug-free work environment. All employees must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol, having an illegal drug in your system, or using, possessing, or selling illegal drugs while on NSHC work time or property, may result in immediate termination. We may use drug testing as a means of enforcing this policy.

It is also recognized that individuals may be taking prescription drugs, which could impair judgment or other skills required in job performance. If you have questions about the effect of such medication on your performance, consult with your supervisor.

ENVIRONMENTAL COMPLIANCE

It is our policy to comply with all environmental laws and regulations as they related to our organization's operations. We will act to preserve our natural resources to the full extent reasonable [and] possible. We will comply with all environmental laws and operate each of our

facilities with the necessary permits, approvals, and controls. We will diligently employ the proper procedures with respect to handling and disposal of hazardous and bio-hazardous waste, including, but not limited to, medical waste.

In helping NSHC comply with these laws and regulations, we must understand how job duties may impact the environment, adhere to all requirements for the proper handling of hazardous materials, and immediately alert your supervisor to any situation regarding the discharge of a hazardous substance, improper disposal of medical waste, or any situation which may be potentially damaging to the environment.

COMPLIANCE PROGRAM & COMMITTEE

Program Structure

The Compliance Program and Committee is intended to demonstrate in the clearest possible terms the absolute commitment of the organization to the highest standards of ethics and compliance. That commitment permeates all levels of the organization. All of these individuals are prepared to support you in meeting the standards set forth in this Code.

Resources I'm Guidance and Reporting, Violations

To obtain guidance on an ethics or compliance issue or to report a suspected violation, you may choose from several options. It is an expected good practice, when you are comfortable with it and think it appropriate under the circumstances, to raise concerns first with your supervisor. Another option is to discuss the situation with another member of management.

NSHC will make every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports possible misconduct. There will be no retribution for reporting in good faith. However, an employee who maliciously or deliberately makes a false accusation with the purpose of harming or retaliating against another colleague will be subject to discipline.

Personal Obligation to Report

We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to correcting wrongdoing whenever it may occur in the organization. Each employee has an individual responsibility for reporting any activity by any employee, physician, or vendor that appears to violate applicable laws, rules, regulations, or this Code.

Internal Investigations of Reports

We are committed to investigate all reported concerns promptly and confidentially to the extent possible. The Compliance Officer will coordinate any findings from the investigations and immediately recommend corrective action or changes that need to be made. We expect all employees to cooperate with investigation efforts.

Corrective Action

Where an internal investigation substantiates a reported violation, it is policy of the organization to initiate corrective action, including as appropriate, making prompt restitution of any

overpayment amounts, notifying the appropriate governmental agency, instituting whatever disciplinary action necessary, and implementing systemic changes to prevent a similar violation from recurring in the future at NSHC.

Discipline

All violators of the Code will be subject to disciplinary action. The precise discipline utilized will depend on the nature, severity, and frequency of the violation and may result in any of the following disciplinary actions:

- Verbal Warning
- Written Warning
- Suspension
- Termination
- Restitution

Internal Audit and Other Monitoring

NSHC is committed to the aggressive monitoring or compliance with its policies.

Acknowledgement Process

NSHC requires all employees to sign an Acknowledgement, confirming they have received the Code and understand it represents mandatory policies of NSHC. New employees will be required to sign this Acknowledgement as a condition of employment.

Adherence to and support of the NSHC Code of Conduct and participation in related activities and training will be considered in decisions regarding hiring, promotion, and compensation for all candidates and colleagues.



NORTON SOUND HEALTH CORPORATION

Patients are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care. NSHC employees will receive training about patient rights in order to clearly understand their role in supporting them.

After reviewing the contents of booklet with your supervisor, please sign the form located at the end of this publication and give it to your supervisor. This form will become part of your personnel file.

NSHC CODE OF CONDUCT
ACKNOWLEDGEMENT AND AGREEMENT

I acknowledge that I have read and understand the NSHC Code of Conduct, and that I agree to abide by the Code while employed by the Norton Sound Health Corporation.

Signature

Date

Printed Name

To be placed in employee's personnel record.

