

# CODE of BUSINESS CONDUCT & ETHICS



*Updated: October 2025*

## *A Message from Leadership*

Dear Colleague,

Enclosed is Hudson Regional's Code of Business Conduct and Ethics. This Code of Conduct supports our mission, vision and value statements: to provide the highest quality service and commitment to our patients and their families. The Code is a key part of Hudson Regional's Compliance Program, which is a permanent part of the organization's infrastructure. Its purpose is to enhance our environment of fairness, sound judgment and mutual respect and to assure that Hudson Regional operations are conducted in compliance with the appropriate Hudson Regional Entity's policies and procedures and all applicable Federal and State laws and regulations. In other words, this Code provides guidance to all Hudson Regional employees in assisting us with carrying out our daily activities. Although many policies and procedures have been developed to guide Hudson Regional employees' behavior and protect them against unlawful and unethical activities, it is important to emphasize that the Code does not replace such policies, but simply enhances them.

Hudson Regional's Compliance Program can only succeed with the commitment and participation of everyone associated with the organization. The Compliance Program was developed to identify issues, prevent or remedy problems and give all Hudson Regional's employees another channel to voice their concerns. All employees will receive training on the Compliance Program, Code of Conduct and related policies upon orientation and annually. It is important that you read and understand the Code and its relevant policies and procedures.

We encourage you to bring to management's attention potential violations of Hudson Regional's policies and/or government laws. To voice your concerns, contact your Manager, Vice President, Vice President of Corporate Compliance. If you wish to remain anonymous you can call the confidential Compliance Hotline number listed below.

Corporate Compliance & Internal Audit  
[ComplianceOfficer@carepointhealth.org](mailto:ComplianceOfficer@carepointhealth.org)  
Hotline: 844.246.4365

You have our personal assurance that no retaliatory action will ever be taken against you for asking a question or raising a concern in good faith about the Code of Conduct or unethical behavior. Because of our Compliance Program, the Code of Conduct, your commitment, dedication and integrity, Hudson Regional will continue to maintain the trust on which the fulfillment of its mission, values and vision depends.

Thank you for your support of this most important program and document.

Sincerely,

Executive Management Team

# CODE of BUSINESS CONDUCT and ETHICS

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## Mission

Treating with compassion and leading with innovation, we improve the health of the communities we serve.

## Vision

Hudson Regional will be recognized for pioneering the future of health care in New Jersey. We will reinvent health care by innovating at every opportunity, challenging convention, and building sustainable models for the patient, communities and health care providers.

## Core Values

**Patient-Centered.** *We put the patient first.* The patient is the center of everything that we do, and we will provide every patient with exceptional care and service that is delivered with dignity and compassion.

**Innovation.** *Innovation is a way of life.* From the coordination of care to advanced technologies, we seek out and embrace new, meaningful ways of delivering care.

**Coordinated Care.** *Personalized coordinated care.* As an integrated health system, we align our physicians, clinics, hospitals and affiliated services to provide the most effective and efficient care possible.

**Sustainability.** *Financial health to reinvest in the future.* Achieving financial health allows us to invest in the best people, at the best facilities, utilizing the latest technologies to provide the first-class care now and tomorrow.

**Community Impact.** *We take care of Hudson County.* We work to create positive outcomes by investing both financial resources and human resources to organizations that are equally committed to the health and vitality of the communities we serve.

## PATIENT RELATIONS

### Quality of Care

Hudson Regional as a whole is committed to providing quality healthcare to our patients and, as such, Hudson Regional treats all patients with respect and dignity and provides 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 needs and only competent and qualified individuals will provide this care, while always considering the safety and well-being of our patients.

### EMTALA

Hudson Regional Hospitals and Medical Centers follows the Emergency Medical Treatment and Active Labor Act (“EMTALA”) in providing an emergency medical screening examination and necessary stabilization to all patients, regardless of ability to pay or the source of their payment. Provided that Hudson Regional Hospitals and Medical Centers has the capacity and capability, anyone with an emergency medical condition is treated. In an emergency situation, or if the patient is in labor, we will not delay the medical screening and necessary stabilizing treatment in order to seek financial and demographic information. Patients with emergency medical conditions are only transferred to another facility at the patient’s request or if the patient’s medical needs cannot be met and appropriate care is knowingly available at another facility. If this occurs, the patient will be transferred in strict compliance with the State and Federal EMTALA regulatory requirements.

### Patient Rights

Hudson Regional listens to and follows the choices made by our patients with respect to their clinical care. Each patient is provided with a written statement of patient rights and information regarding our privacy practices. Hudson Regional respects patients’ rights with respect to treatment and medical services without discrimination based on race, age, religion, national origin, sex, sexual preferences, handicap, diagnosis, ability to pay, or source of payment, and to make decisions regarding their

medical care, establishing their advance directives and the freedom to choose physicians and other service providers.

## **BUSINESS AND FINANCIAL REPORTING**

### Billing for Services

Hudson Regional is committed to ethical, honest billing practices and, accordingly, Hudson Regional has implemented policies, procedures and systems to facilitate accurate billing to government payers, commercial insurance payers, and patients. All policies, procedures and systems conform to Federal and State laws and regulations. Hudson Regional will not tolerate any deliberately false or inaccurate submission of bills. Any employee who knowingly submits a false claim, or provides information that may contribute to submitting a false claim such as falsified clinical documentation, is subject to dismissal. Hudson Regional will invoice patients or third parties only for services provided and will provide assistance to those seeking to understand the costs of their care. Hudson Regional Centers will also attempt to resolve billing questions and objections to the satisfaction of the patient.

In support of accurate billing, medical records must provide reliable documentation of the services rendered. It is important that all individuals who contribute to medical records provide accurate information and do not destroy any information considered as part of the official medical record.

Accurate and timely documentation also depends on the diligence and attention of physicians who treat patients at Hudson Regional. Each physician must provide us with complete, legible and accurate information in a timely manner. All Hudson Regional employees involved in billing and coding are expected to be knowledgeable in all aspects of current laws and regulations affecting their duties. Hudson Regional will ensure annual training of applicable staff members, clinicians, coders and billers on proper coding, charge capture and billing.

### Errors and Corrective Action

We bill only for medically appropriate services actually performed by properly licensed individuals. We do not submit duplicate bills. If billing errors or billing requirement violations come to light, appropriate corrective action is taken, including refunding any overpayment.

### Coding

Hudson Regional will continue to make every attempt to code all medical records completely and accurately using the proper LCD, ICD-10, CPT-4 and/or HCPCS codes reflective of the treatment and diagnostic documentation written in the medical record by a physician or designee.

In the event a billing error is discovered, immediate action will be taken to correct the error, alert the payer and promptly refund any payments not due to Hudson Regional.

### Cost Reports

Compliance with all Federal and State laws, regulations and guidelines relating to Hudson Regional's cost report is essential. All employees involved with the cost report must have extensive knowledge on the laws, regulations and guidelines which govern and define what costs are allowable and the appropriate method used to claim reimbursement for the cost of services provided. Hudson Regional will not submit a cost report that contains false or inaccurate information. In preparation, submission and settlement of Hudson Regional's cost report, the Finance Department will seek clarification from the intermediary of any dilemma which could impact the Hospital. In addition, Hudson Regional's Finance Department will comply with applicable auditing, accounting and financial disclosure laws.

### Financial Statements

All financial statements and other reports must reflect actual transactions and conform to generally accepted accounting principles. Hudson Regional requires that all documents present a high level of accuracy and completeness. Hudson Regional employees recognize that these records serve as a basis for managing the business and are important in meeting our obligations to our patients, employees, the government, suppliers and others.

## **FRAUD WASTE AND ABUSE**

All staff and business associates have the responsibility to prevent fraud, waste, and abuse. The Hudson Regional's Fraud, Waste, and Abuse policy specifies individual responsibilities and actions regarding fraud/dishonest acts.

Fraud - an intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to him/herself or some other person. It includes any act that constitutes fraud under applicable federal or State law.

Waste - The thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of resources owned or operated by Hudson Regional to the detriment or potential detriment of Hudson Regional. Waste also includes incurring unnecessary costs because of inefficient or ineffective practices, systems, or controls.

Abuse means provider practices that are inconsistent with sound fiscal, business, or medical practices, and result in an unnecessary cost to the Medicaid/NJ FamilyCare program, or in reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards for health care. It also includes enrollee practices that result in unnecessary cost to the Medicaid/NJ FamilyCare program

## **INTELLECTUAL PROPERTY**

Intellectual property includes any invention, discovery, trade secret, technology, creation, scientific or technological development, computer software, or other form of expression of an idea that arises from the activities of persons employed by Hudson Regional, or anyone using Hudson Regional offices or facilities under the supervision of corporation personnel. Hudson Regional owns the intellectual property created by staff and business associates if the intellectual property is:

Created by the staff and business associates member within the scope of employment; created by the staff and business associates member on corporation time with the use of corporation facilities or supplies; commissioned by Hudson Regional pursuant to a signed contract; fits within one of the nine categories of works considered works for hire under copyright law; or results from research supported by federal funds or third-party sponsorship.

Staff and business associates must disclose the intellectual property created by the staff member or business associates to the Compliance Officer well before he or she submits any information about the intellectual property for publication, or makes any public disclosure or even a private disclosure to a commercial entity.

## **CONFLICTS OF INTEREST**

### General

It is the policy of Hudson Regional to prohibit its employees and other associates from engaging in any activity, practice, or act which conflicts with, or appears to conflict with, the interests of Hudson Regional, or its patients. All Hudson Regional employees, medical staff, board members, and contractors must disclose to the Compliance Officer any interest they or their immediate family may have with any organization which does business or competes with Hudson Regional.

### Gifts and Entertainment

Members of Hudson Regional's workforce shall not accept anything of value for any care or assistance provided to patients, except perishable, non-cash items of nominal value (e.g., basket of fruit, candy, flowers, etc.) for general consumption or enjoyment.

Members of Hudson Regional's workforce and/or their immediate family may accept non-cash gratuities (e.g., meals or entertainment) offered in the normal course of business, up to \$150 aggregate value in any 12-month period from a single individual or entity, unless offered with the implied or explicit expectation of favorable action or obligation. Gratuities above this value must be reported to the Compliance Office for Conflict of Interest assessment.

Members of Hudson Regional's workforce, and/or their family members, may not under any circumstances solicit anything of value from any vendor, client, patient, or visitor. **Exception:** In alignment with common industry practices, McCabe

Ambulance van drivers and EMT personnel may accept gratuities while carrying out their official duties.

#### Outside Employment

Since outside employment may constitute a conflict of interest if it places the employee in a position that might affect the employee's objectivity in carrying out his or her responsibilities, or lessens the efficiency, alertness or productivity expected of the employee, managers and above are required to record their outside employment on the Hudson Regional's Conflict of Interest questionnaire and notify Human Resources and their supervisors accordingly. Employees may not use Hudson Regional's time, materials, information or other assets in connection with their outside employment.

#### Non-Solicitation; Non-Interference (Physicians)

Physician acknowledges that Hospital's competitors would benefit greatly from Physicians' experience and expertise and reputation. Therefore, during the term of this physician's employment and, for a period of two years immediately following the termination or expiration of his/her employment: Physician shall not, except with Hospital's prior written consent, directly or indirectly: (i) solicit any person who is, or at any time during the term of Physician's employment hereunder was, a patient of Hospital for the purpose of requesting or inducing such person to refrain from or discontinue obtaining medical services of any kind from Hospital or other physicians employed or contracted by Hospital or from any other affiliates within the Hudson Regional System; (ii) solicit or induce, or attempt to solicit or induce, any employee of Hospital or the Hudson Regional System to terminate such employment for any reason whatsoever and/or to accept employment with Physician or any person or entity with which Physician is associated, or otherwise hire any of such employees or permit any of such employees to be hired by any person or entity with which Physician is associated, whether through solicitation or otherwise; or (iii) solicit or induce, or attempt to solicit or induce, any insurance company, managed care company or any other third party payor, or any physician, medical group or any other health care provider or entity that has or had a contractual arrangement or business relationship with Hospital or other affiliates within Hudson Regional Plan during the term of this his/her employment, to discontinue or terminate such contractual arrangement or business relationship for any reason whatsoever. For purposes of the preceding sentence, the term "solicit" shall include contact initiated by Physician through any means, including without limitation, in-person solicitation, telephone calls, emails, text messages or letters, written announcements or flyers, or advertisements in newspapers, circulars or other periodicals whose circulation focuses on or is primarily limited to residents of Hudson County, New Jersey or other locations where Hospital regularly furnishes services. The foregoing restrictions shall not be deemed to prohibit Physician from announcing Physician's post-termination professional activities in mass media communications and newspapers and other periodicals of general circulation that circulate beyond a Five (5) mile radius where Hospital regularly furnishes services, provided that such announcements and advertisements refrain from any mention or reference of Physician's prior association with Hospital or the Hudson Regional System. Physician understands that this restriction will apply for a period of two years from when Physician's employment with Hospital actually ends.

#### Relationship with Suppliers

It is Hudson Regional's policy to use best efforts to ensure that all contracts are in compliance with Federal/State health care program statutes, regulations and policies. Business transactions must be entered into solely on the basis of the best interest of the Hudson Regional Entity. Hudson Regional seeks to comply with all Federal and State laws and regulations including the requirement not to contract with sanctioned individuals or companies.

### **COMPUTER USAGE**

#### Computer Information Security

It is a violation of law to disclose computer passwords; penalties range from a Class B misdemeanor to a felony depending on the related monetary damage. Computer passwords should be considered highly confidential. Staff and business associates should never disclose computer passwords to anyone other than those individuals in Hudson Regional Plans that have official capacity and approval from the Board of Directors to access staff and business associates passwords. Furthermore, staff and business associates should not write or otherwise document passwords in a place that is accessible by others.

#### Computer Software

Staff and business associates who use software licensed to Hudson Regional or an entity owned by Hudson Regional must abide by applicable software license agreements and may copy licensed software only as permitted by the license. Unauthorized

duplication of copyrighted software is a violation of federal copyright law. Staff and business associates should direct any questions about applicable software license agreements to their Department Director.

## **HIPAA**

### Privacy - Confidential Information

We protect the confidentiality of patient information and Hudson Regional's internal information. Hudson Regional securely files documents and we are careful about written and spoken communications so that information is given only to people authorized to receive it and unauthorized disclosures are prevented. We access only what is needed to provide care or to conduct Hudson Regional business.

Hudson Regional will only use and disclose a patient's protected health information ("PHI") in accordance with the state and federal laws and regulations and for the purposes of Treatment, Payment or Health Care Operations ("TPO"). Activities that constitute TPO are:

Treatment - the coordination or management of health care by a health care provider; the referral of a patient from one health care provider to another, or consultation between health care providers relating to a patient.

Payment - billing, claims management, health care processing, data processing related to billing, claims management, appropriateness of care, coverage under a health plan, pre-authorization of services, justification of charges and collection activities

Health Care Operations - certain administrative, financial, legal, and quality improvement activities that are necessary to run Hudson Regional's business and support the core functions of treatment and payment (*e.g. customer service activities, mergers and acquisitions, etc.*)

A signed patient authorization is necessary for all other transactions. It protects our patients and limits the amount of PHI which may be released.

### Security

Hudson Regional safeguards access to protected health information and other confidential information. Hudson Regional provides its employees access to computer, computer networks, email systems and internet services solely to help employees do their work. Incidental and occasional personal use is permitted, so long as such use does not interfere with Hudson Regional's needs and operations, is not for personal gain and does not violate any Federal and/or State laws or any Hudson Regional policy.

## **SAFEGUARDING ASSETS**

### Preservation of Assets

At Hudson Regional, we use resources responsibly and effectively solely for the purposes of furthering Hudson Regional's activities. We do not use Hudson Regional's facilities or resources for our personal benefit, or for the benefit of family members, friends or others.

### Expenditure of Funds

Hudson Regional's funds are used only for the legitimate business purposes of the Hudson Regional Entity. Expenditures of Hudson Regional funds are recorded and accounted for in an accurate and timely manner in the Hudson Regional Entity's books of accounts. All accounts of the Hudson Regional Entity funds, except authorized imprest funds/petty cash accounts, shall be established and maintained in the name of the Hudson Regional Entity and may be opened or closed only on the authority of Hudson Regional's Board of Trustees.

## **WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES**

### Drug and Weapon-Free Workplace

Hudson Regional is committed to a drug-free environment. Staff and business associates reporting to work under the influence of an illegal controlled substance or alcohol, or unlawful manufacture, sale, distribution, dispensing, possession or use of a controlled substance is prohibited in the workplace and on any property under the control of Hudson Regional. The



use of alcoholic beverages is prohibited in Hudson Regional facilities. However, the CEO or his/her designee of Hudson Regional may waive this prohibition with respect to any event sponsored by Hudson Regional.

Staff and business associates of Hudson Regional are required to notify the Compliance Officer within five (5) calendar days of a conviction for an offense involving a controlled substance that occurred in or on the premises controlled by Hudson Regional.

In order to ensure a safe environment for employees and customers, Hudson Regional prohibits the wearing, transporting, storage, or presence of firearms or other dangerous weapons in our facilities or on our property. Any employee in possession of a firearm or other weapon while on our facilities/property or while otherwise fulfilling job responsibilities may face disciplinary action including termination. A client or visitor who violates this policy may be removed from the property and reported to police authorities. Possession of a valid concealed weapons permit is not an exemption under this policy.

#### Equal Employment Opportunity

Hudson Regional is an Equal Employment Opportunity/Affirmative Action employer. In the administration of its employment policies and practices, Hudson Regional does not discriminate against employees or applicants for employment because of race, color, national origin, sex, sexual orientation, religion, age, veteran status, or disability. Hudson Regional takes affirmative steps to ensure that applicants are hired, and staff and business associates are treated, in a non-discriminatory manner. Hudson Regional's commitment to equal opportunity principles applies to all aspects of employment, including recruitment, retention, promotion, compensation, benefits, and training.

#### Sexual Harassment and Sexual Misconduct

Hudson Regional is committed to the principle that the working environment should be free from inappropriate conduct of a sexual nature. Sexual harassment and sexual misconduct are illegal and unprofessional. Staff and business associate members who engage in such conduct will be subject to disciplinary action, including termination.

#### Workplace Health and Safety

All staff and business associates should perform their duties in compliance with all applicable institutional policies, federal, state and local laws and standards relating to the environment and protection of worker health and safety. Staff and business associates should become familiar with and understand how these laws, standards, and policies apply to their specific job responsibilities. Each staff and business associates member is responsible for advising their immediate supervisor of any serious workplace injury or any situation presenting a danger of injury so that timely corrective action may be taken. Department Directors must report unsafe practices or conditions to the Human Resources Department or (Compliance Officer).

#### Workplace Violence

Hudson Regional strives to assure that staff and business associates are provided a safe working environment. Violence in the workplace is not tolerated. Workplace violence may be considered illegal and it is certainly unprofessional.

Staff and business associates members who are involved in violent actions against other individuals or verbal or written threats directed at individuals will be subject to disciplinary action, including termination.

Staff and business associates of Hudson Regional who observe or experience any form of harassment or discrimination should report the incident to the Safety Officer or (Compliance Officer).

#### Dishonest or Illegal Activities

Dishonest or illegal activities on Hudson Regional premises or while on business representing Hudson Regional, will not be condoned and may result in disciplinary action, up to and including dismissal and criminal prosecution.

#### Training and Development

Training will be given to all employees at orientation to ensure employees have the proper knowledge of the organizational policies and processes to perform their duties and meet the needs of Hudson Regional's patients. Training relating to specific compliance issues and concerns, including but not limited to billing and coding issues, and specific federal regulatory



provisions will be required for employees with relating skill sets and/or responsibilities. Attendance to related training/education sessions is mandatory.

#### Verification of Qualifications

Hudson Regional hires only qualified individuals with proper expertise, licenses and experience. Qualifications are verified in connection with offering employment. Hudson Regional performs monthly exclusions checks on all employees using the Office of Inspector General (OIG) databank, System for Award Management (SAM) database and the NJ State Debarment database.

#### Respect for Cultural Values and Religious Beliefs

Hudson Regional values diversity and treats patients, families, visitors, associates, medical staff and all others with respect and dignity.

#### Employment of Relatives

Employment of relatives wherein such relatives have a direct reporting relationship to a member of senior management, including the CEO, shall be prohibited. In the event the situation involves a direct reporting relationship with a supervisor, manager, or director, this employment too shall be prohibited unless a waiver is granted by Hudson Regional leadership.

### **MARKETING**

To respect patients' rights to privacy and confidentiality, the Hudson Regional Entity will protect patient information from release to agencies, organization, or entities seeking to use patient information for marketing purposes in accordance with all Federal, State and JCAHO Privacy rules and regulations. Hudson Regional's patient/member information database will not be sold to any agency, organization or individual for any purpose.

Photographs of patients/members will not be used for any marketing material or news stories without the patient/member's verbal and written consent. Photographs of minors (under the age of 18) will only be taken and published if the verbal and written consent of one or both parents is received.

### **REPORTING ILLEGAL AND UNETHICAL BEHAVIOR**

All employees are required to comply fully with the rules, standards and principles of the Code of Conduct. Employees are required to report any suspected violations to a Manager, the service line Vice Presidents, the Compliance Director, or Vice President of Corporate Compliance. You may also use the Compliance Program confidential Compliance Hotline whereby you can remain anonymous. Hudson Regional will attempt to treat all reports, including the identity of the reporting employee, confidentially.

**As set forth in our Non-Retaliation Policy: No adverse action or retaliation will be taken against any employee because he/she reports in good faith a suspected violation of the Code.**

### **RECORDKEEPING**

#### Accuracy of Records

Every Hudson Regional employee is responsible for the integrity and accuracy of the documents and records not only to comply with regulatory and legal requirements but also to ensure records are available to support the business practices and actions. No one may alter or falsify information on any record or document. Hudson Regional employees must not tamper with records.

#### Record Retention

Medical and business documents and records are retained in accordance with the NJ State Division of Archive and Record Management. Please see your specific entity policy on Record Retention. Medical and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files on disk or tape and any other medium that contains information about the organization or its business activities.

### Disposal of Documents and Records

It is important to retain and destroy records only according to Hudson Regional's policy. Therefore, no one may remove or destroy records prior to the specified date without first obtaining permission as outlined in the record management policy. Records must never be destroyed in an effort to deny governmental authorities that which may be relevant to a government investigation.

### Photocopying of Copyrighted Material

Most works should be presumed to be copyright protected, unless further information from the copyright holder or express notice reveals that the copyright holder intends the work to be in the public domain. Permission must be obtained from the copyright owner to copy copyrighted materials where: copying extends beyond the boundaries of the guidelines contained in the copyrighted materials policy; advice of the General Counsel has not been sought; and, copying is not fair use.

## **CONTACT WITH OUTSIDE INVESTIGATORS**

### Contacts with the Government and Outside Investigators

Hudson Regional we expect to cooperate in government investigations with all reasonable demands made in any government investigation. However, it is essential that the legal rights of Hudson Regional and its staff and business associates be protected. If a staff and business associates member receives a subpoena, inquiry, or other legal document from any governmental agency regarding corporation business, whether at home or in the workplace, the staff and business associates member must immediately notify the Risk Manager or (Compliance Officer). Hudson Regional does not prohibit a staff member or business associates from speaking to any government investigator or agent. However, to best protect the staff and business associates and Hudson Regional, if any governmental agency or any attorney contacts a staff and business associates member at home concerning corporation business, the staff member or business associates may politely ask the agent to contact the Hudson Regional General Counsel, Risk Manager or Compliance Officer.

**McCabe Ambulance Employees:** all McCabe personnel must forward investigatory requests to management. McCabe management will be responsible for release of records and/or other informational requests.

## **PHYSICIAN RELATIONSHIP**

### Preventing Improper Referrals or Kickbacks

Hudson Regional strictly adheres to the Federal and State laws and regulations regarding the relationship between hospitals and physicians who may refer patients to the facility. Therefore, we accept patient referrals/admissions solely based on the patient's clinical needs and our ability to render the necessary services. Hudson Regional does not pay or offer to pay anyone for referral of patients/members.

### Adherence to Antitrust Regulations

Hudson Regional will comply with all applicable Federal and State Antitrust laws.

## **Acknowledgement Process**

CarePoint requires all employees to sign an acknowledgment confirming they have received the Code of Conduct (“The Code”), understand that it represents mandatory policies of CarePoint and agree to abide by the Code during the entire term of employment. New employees are required to sign this acknowledgment as a condition of employment. Every existing employee is also required to participate in annual compliance training and update their acknowledgment of the Code

## **Receipt and Acknowledgment**

I acknowledge that I have received my personal copy of the CarePoint’s Code of Conduct (“The Code”). I understand that I am responsible for knowing its content and conducting all CarePoint activities consistent with these policies, principles and standards. I also understand that I am responsible for reporting any alleged or suspected violations of The Code to the appropriate person(s) identified in this handbook. I may contact the Compliance Department at:

Bayonne University Hospital  
The Heights University Hospital  
Hoboken University Hospital  
Secaucus University Hospital  
Garden State Healthcare Associates  
Hudson Regional Management Service Organization  
McCabe Ambulance  
Quality Care Associates

Corporate Compliance & Internal Audit  
[ComplianceOfficer@carepointhealth.org](mailto:ComplianceOfficer@carepointhealth.org)  
Hotline: 844.246.4365

I further understand that failure to follow the Code will subject me to disciplinary action, up to and including suspension or termination. In addition, I understand there is also a range of penalties which can apply to individuals or organizations for violation of applicable Federal and State laws and regulatory requirements.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Department: \_\_\_\_\_

Date: \_\_\_\_\_