

Code of Conduct & Ethics

Overview

Kootenai Health is committed to possessing and demonstrating the reliability, honesty, trustworthiness and high degree of integrity expected of a leading health care organization and a participant in federally funded health-care programs. To help strengthen this commitment, Kootenai has implemented a Compliance Program.

These guidelines are designed to assist each of us in making the right choices when confronted with difficult situations. The responsibility for ethical behavior rests with each of us through the judgments and actions that are taken.

Identifying Compliance Issues

At Kootenai, each employee is expected to know and understand Kootenai's compliance policies as well as the basic laws and regulations that affect his or her job. If you are unsure about the legality or appropriateness of an action or proposed action, think of the following:

- ▶ Does it comply with the law and Kootenai's compliance policies and procedures?
- ▶ How would it look to your family and friends, your coworkers, or our patients, and the community?
- ▶ Would you feel good about this if it were broadcasted on the evening news?

Gifts and Gratuities

Dealing with product and service suppliers, as well as referring providers, can present ethical and legal problems. Kootenai may not give, receive, offer, or ask for anything of value in exchange for referring patients, products, or services. This applies to offering or receiving any money, gifts, free or discounted items or services, professional courtesies, or other arrangements with the intent to induce referrals. In general, if you or your family member can gain personally from a transaction, that transaction is prohibited. Please see the Gifts, Entertainment and Travel Offers from External Resources for guidance on this topic.

Patients who would like to make a gift to Kootenai Health should be referred to the Kootenai Health Foundation. Some patients may insist on making a personal gift to you that cannot be declined without embarrassing the patient. If the gift is small, you may accept it and share it with co-workers (e.g., flowers or cookies). If the gift cannot be shared, please discuss it with your department leadership.

Additionally, Kootenai Health leadership must act ethically with their own employees as it relates to purchases made with Kootenai funds. Any internal gift to employees greater than \$25 should be discussed with department leadership to ensure compliance with IRS rules. Please see the Purchase Credit Card Program Policy for more information.

Confidential Information

Information about a patient's medical condition is highly sensitive and its confidentiality must be maintained. No employee, physician or other health care provider has the right to any patient information other than that necessary to perform his or her job. No employee should ever release or discuss patient-specific information with others unless it is necessary to provide appropriate medical care to the patient, it is with the patient's written consent, or it is required by law. See our HIPAA policies for more information.



Jon Ness, CEO
Kootenai Health

Kootenai Health has earned a reputation for outstanding medical care delivered with compassion.

This organizational reputation was built because of the honest, ethical behavior of many individuals over many years. As we focus on providing a superior experience for our patients, their loved ones and our coworkers, the importance of our code of conduct is paramount.

The practice of behaving honestly, ethically and with integrity is an individual responsibility. Every day we make choices about how to conduct ourselves; we are each accountable for our decisions. The code of conduct is provided to you as a resource. Please refer to it when you have questions, and always feel free to reach out to our compliance department when questions arise.

Thank you for your ongoing commitment to our patients and the integrity of Kootenai Health.

Jon Ness, CEO
Kootenai Health

Confidential Compliance Hotline

1.877.631.0019 tel



KootenaiHealth

2003 Kootenai Health Way
Coeur d'Alene, Idaho 83814
kh.org

10.30.2023

Intellectual Property

Intellectual property includes patents, trademarks, salary and wage structure data, service marks, trade secrets, copyrights, proprietary information and inventions or techniques. Intellectual property is protected by federal and state laws. Violations of intellectual property laws may result in personal civil damages or criminal charges. In addition, Kootenai may be held responsible for the actions of individual employees who break intellectual property laws.

Conflicts of Interest and Outside Activities

A conflict of interest arises whenever an employee's personal interest or that of an employee's immediate family conflicts or appears to conflict with the interest of Kootenai. Everyone has a duty to avoid conflicts of interest or the appearance of conflicts of interest. Employees must disclose any conflicts of interest at the time of hire and attest to any conflicts that may arise thereafter. See our Conflicts of Interest policy for more information.

Safety, Health, and Environment

Kootenai shall manage and operate its business in a manner that respects our environment and conserves natural resources. Kootenai personnel shall:

- ▶ Comply with all applicable Health and Safety Policies to ensure patients, visitors, employees, and others are protected from unnecessary risks and unsafe conditions.
- ▶ Dispose of all waste in accordance with applicable laws and regulations and strive to utilize resources appropriately and efficiently, including recycling when possible.
- ▶ Immediately report suspected violations of an environmental or occupational health and safety law and shall work cooperatively with the appropriate authorities to remedy any environmental contamination that may occur in the workplace.

Non-Discrimination and Harassment-Free Workplace

Employees' rights are best protected by open communication and a spirit of cooperation. Kootenai is committed to equal employment opportunity in the workplace and a working environment free of prejudice or harassment on the grounds of race, color, religion, sex, sexual orientation, gender identity, age, disability, national origin, or any other legally prohibited factor. All employees shall be treated with respect, dignity, and courtesy and will strive to communicate respectfully to and about others in a positive manner.

Fraud, Waste, and Abuse Laws

Honesty and accuracy in billing and in the making of claims for Medicare or Medicaid payment is vital. The False Claims Act imposes civil liability on any person or entity that knowingly submits, or causes to be submitted, a false or fraudulent claim for payment to the U.S. government. It is a federal felony to willfully make a false statement in connection with a claim for payment or an application for certification under Medicare and Medicaid.

Political Activity

As employees, we are encouraged to take part in community and political affairs outside of the workplace. If we participate in such activities, please remember to make it clear that we are acting as private citizens and not as representatives of Kootenai Health.

Reporting Compliance Issues

Compliance is everyone's responsibility. Each employee is required to report any issue or practice that he or she believes in good faith may constitute a violation of a law, the code of conduct or any of Kootenai's policies. People who are found to have engaged in unlawful conduct or conduct in violation of Kootenai policies, or who have failed to detect, report and/or correct any offense, are subject to corrective action, up to and including termination of employment.

Reports of suspected or actual violations can be made in a number of ways as described in the following:

- ▶ Orally or in writing to the employee's supervisor
- ▶ By calling the compliance officer directly at (208) 625-4016
- ▶ Making a report to the confidential hotline by calling 877-631-0019 24 hours a day, 7 days a week or by visiting this website: www.kootenaihealth.ethicspoint.com

The Confidential Hotline:

Reports to the Compliance Hotline cannot be traced and will be treated confidentially. Employees may remain anonymous if they choose. No individual will be subject to retaliation for bringing forth a good faith concern. Anyone who attempts to retaliate against an employee who has in good faith made a report to the Compliance Hotline will be subject to corrective action, up to and including termination of employment. See our Whistleblower policy for more information.