



# Code of Conduct

## *Optimizing our culture*

*“It is more than what we say, it is what we do every day.”*

# Message from the President and Chief Executive Officer of Hartford HealthCare

Our vision at Hartford HealthCare is to be most trusted for personalized coordinated care. Every colleague — each employee, volunteer, medical staff and board member, you and me — contributes to making our vision a reality for all the people we're privileged to serve. We do this through our core values: **Integrity, Caring, Excellence** and **Safety**.

Hartford HealthCare's Code of Conduct guides us in applying these core values to all we do, all the time. The behaviors in our Code are the foundation that each of us at Hartford HealthCare is expected to follow. We've created this guidebook to help explain and understand these expectations.

My colleagues and I want to be sure you feel comfortable asking questions about any of our policies. We strive to make Hartford HealthCare a place where you are always free to address a concern or situation about how we conduct ourselves. Your manager, your Human Resource representative, our Chief Compliance Officer or our Legal Department are available to you as important resources. Also, you should be aware that our Office of Compliance and Integrity has an anonymous and confidential reporting line as well. It's available every day, 24/7, either by phone, 1.855.442.6241, or online at [compliance.hartfordhealthcare.org](https://compliance.hartfordhealthcare.org).

By committing to our Code of Conduct, you are joining all of us across our system of care — ensuring that **we do the right thing, the kind thing, the best thing** and **the safe thing**. Thank you for your commitment to all the people we serve, and all that we stand for.

Sincerely,



Jeffrey A. Flaks  
President and Chief Executive Officer



## Mission:

To improve the health and healing of the people and communities we serve.

## Vision:

Most trusted for personalized coordinated care.

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## Our Values

This Code of Conduct is based on HHC's values: **Integrity, Caring, Excellence, and Safety.**

### INTEGRITY: We Do the Right Thing

Our actions tell the world what HHC is and what we stand for. We act ethically and responsibly in everything we do and hold ourselves accountable for our behavior. We bring respect, openness and honesty to our encounters with patients, families and coworkers and support the well-being of the communities we serve.

### CARING: We Do the Kind Thing

Every HHC Community member touches the lives of the patients and families in our care. We treat those we serve and each other with kindness and compassion and strive to better understand and respond to the needs of a diverse community.

### EXCELLENCE: We Do the Best Thing

In HHC, only the best will do. We work as a team to bring experience, advanced technology and best practices to bear in providing the highest-quality care for our patients and families. We devote ourselves to continuous improvement, excellence, professionalism and innovation in our work.

### SAFETY: We Do the Safe Thing

Patients and families have placed their lives and health in our hands. At HHC our first priority — and the rule of medicine — is to protect them from harm. We believe that maintaining the highest safety standard is critical to delivering high-quality care and that a safe workplace protects us all.

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# Hartford HealthCare Corporation

## Code of Conduct

### Introduction

Hartford HealthCare is committed to full compliance with all laws and regulations that apply to us in all of the work that we do. The standards described in our Code of Conduct (the “Code”), along with our values, mission statement, and policies serve as guidance to promote ethical, honest, and lawful actions for you, as part of our HHC Community. The Code is not intended to cover every situation. It is an important reference tool that can help you make the right decisions. Additional information can be found in policies, procedures and guidance disseminated throughout our healthcare system.

#### DEFINITIONS:

- **Hartford HealthCare (HHC)** refers to the Hartford HealthCare Corporation and any and all Member Organizations.
- **Member Organization** is any entity directly or indirectly controlled by Hartford HealthCare.
- **HHC Community** includes all HHC employees, contracted individuals with the role and responsibility of an employee, medical directors, chiefs of a section, department and division, members of the HHC and regional board of directors and board delegated committees, officers, executive leadership, volunteers, and trainees.
- **OCI** refers to the HHC Office of Compliance and Integrity.

As the delivery of healthcare changes, this Code may be modified at any time. There may be other HHC or Member Organization policies that apply to matters covered by this Code, including but not limited to, Medical Staff policies, Privacy and Security policies and Human Resources policies. In the event that more than one policy applies to a situation, all such policies will be applied to the fullest extent possible. If there is a conflict or gap in the individual policy provisions, the provision of the policy that is most consistent with the values of HHC and compliance with the law will be applied.



## Our Responsibilities

As members of the HHC Community, we are each responsible for upholding these same high standards in all aspects of our work and our professional relationships. Responsibilities include, but are not limited to:

- Reviewing and following the Code of Conduct.
- Using good judgment and seeking help when you are uncertain what to do.
- Behaving ethically, honestly and truthfully in all situations.
- Speaking up and reporting concerns about actions you encounter at HHC that may be inconsistent with the Code.
- Always cooperating fully with all inquiries and investigations related to reported issues.
- Participating in training programs to further your understanding of the Code, its application to your work at HHC, and your responsibilities.
- Consistently utilizing H3W Leadership Behaviors in all workplace interactions.

## Additional Responsibilities of Leaders

Leaders, including all individuals in a position of supervisory responsibility are accountable for shaping the values-based culture within our organization. Therefore the following are additional responsibilities that are expected:

- Serve as a role model for supporting our Mission, Vision and Values.
- Clearly communicate expectations for high standards of ethical behavior to those they lead.
- Promote a culture of trust, open communication and respect.
- Encourage those they lead to ask questions and raise issues and concerns.
- Ensure those they lead complete all mandatory trainings.
- Comply with HHC's non-retaliation policies.

## Additional Responsibilities of Board and Board Committee Members

The HHC Board of Directors is responsible for providing sound governance and oversight that drives accountability throughout the HHC Community. Our Board oversees responsible business practices, strategic decision making and enterprise risk management activities. In addition, our Board:

- Challenges HHC leadership to make the best decisions for our patients and customers.
- Discloses potential or perceived Conflicts of Interest that may affect independent judgment.
- Promotes diversity amongst Board Members and throughout the HHC Community.
- Fosters a culture of Integrity where we are always expected to comply with all applicable laws, rules and regulations.





## Violations of Our Code of Conduct

The standards set forth in our Code are mandatory and must be followed. All HHC Community members will be held accountable for behaviors and actions inconsistent with the Code.

The following are examples of behaviors and conduct that can result in disciplinary actions or sanctions:

- Participating in, or failing to report a violation of law, regulation, or HHC policy;
- Providing substandard, unsafe or medically unnecessary patient care;
- Falsifying records of any type;
- Theft or misappropriation of HHC assets, funds, equipment, supplies or other property;
- Retaliating against individuals who report issues and concerns in good faith;
- Deliberately filing false or frivolous reports of violations;
- Actions that may be discriminatory, harassing, or bullying;
- Reckless or intentional actions or behaviors that jeopardize the privacy and security of personal health information and other confidential business information.

## Duty to Report

**Reporting a violation:** You have an important role in helping us comply with laws, regulations and HHC policies. When you discover a problem or suspect something is wrong, it is your individual responsibility to report the activity to the Office of Compliance and Integrity.

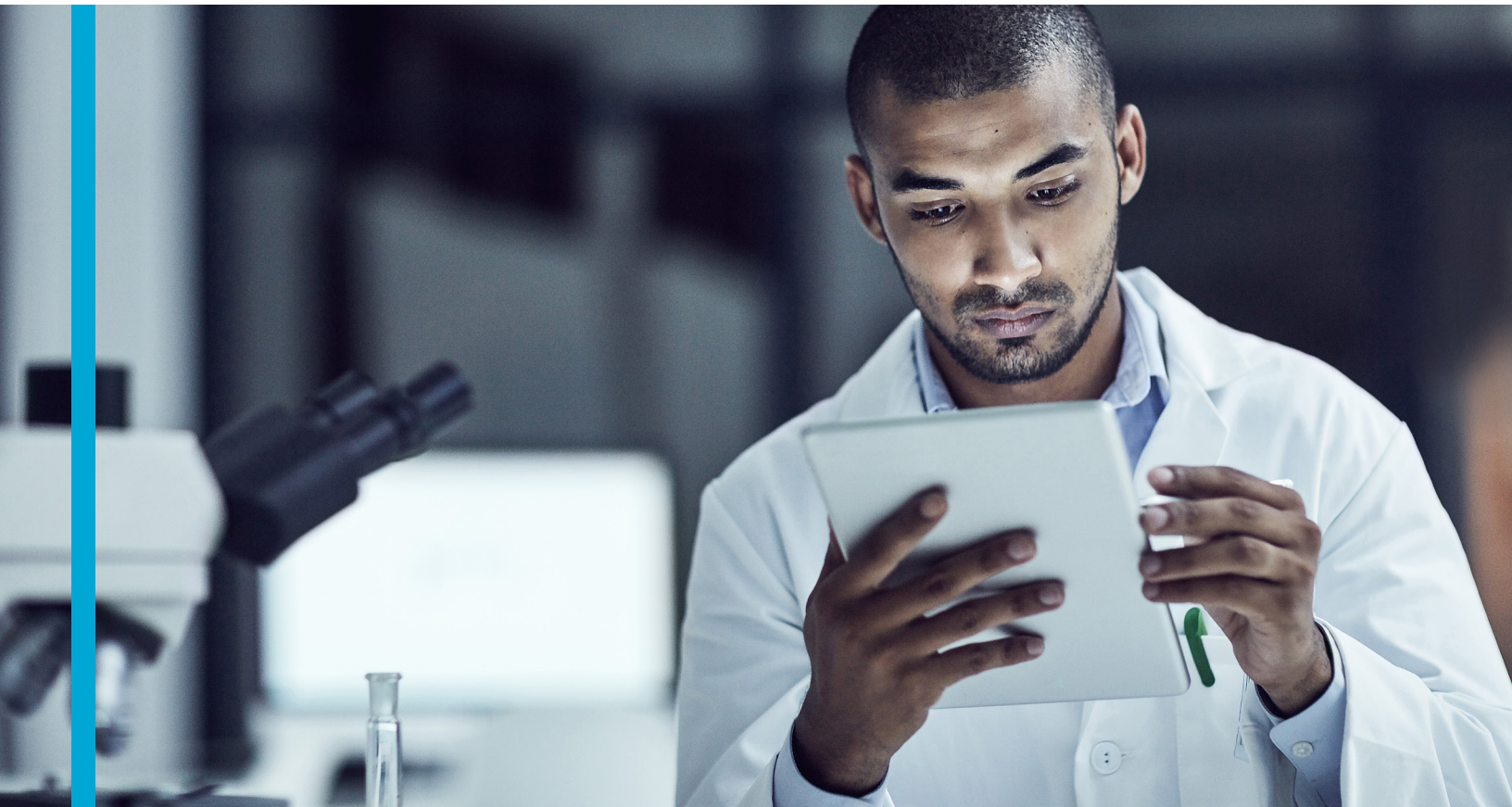
**Hartford HealthCare's ComplianceLine:** Contact HHC's ComplianceLine any time at **1.855.442.6241** or via the internet at <http://Complianceline.Hartfordhealthcare.org>. The ComplianceLine is staffed 24 hours a day, seven days a week by an outside organization on behalf of HHC.

**Anonymity & Confidentiality:** When contacting the ComplianceLine, you may choose to remain anonymous. HHC maintains, to the full extent of the law, the confidentiality of any individual who reports concerns or possible misconduct.

HHC takes all reports to the ComplianceLine very seriously and handles each one on a case-by-case basis. Internal investigations of reported concerns are handled in a manner that is as confidential as possible. After filing a report you may contact the ComplianceLine to provide additional information and/or request a status update.

Consequences for not reporting potential compliance issues include disciplinary measures up to, and including termination from employment. The failure to comply with laws and regulations and/or to report those known or suspected violations can have very serious consequences for HHC. Ensuring compliance with all laws and regulations requires Integrity and strong teamwork. We are all responsible for safeguarding HHC, our colleagues and our patients.

**Non-Retaliation:** It is your responsibility to report any concerns or inappropriate actions you know about. Consistent with our values, HHC maintains a Non-Retaliation Policy that prohibits retaliation against any HHC Community member who reports an incident in good faith.





# STANDARDS

## STANDARD: Quality of Patient Care

HHC is committed to providing the highest quality, safest care and value to our patients. As an HHC Community member, you are expected to follow our Standards below.

**Dignity and Respect:** We deliver services with dignity and respect for each person, including a patient's family members. Examples of such behaviors include acting in the best interests of patients, maintaining a positive, customer-focused attitude and responding to requests for information while safeguarding privacy and security. We respect our patients' dignity and provide comfort and convenience with courtesy. We respect our patients' spiritual and cultural beliefs.

**Safety:** We are committed to maintaining a safe healthcare environment. We follow clinical care guidelines that we have adopted. We explain the outcome of treatment and procedures to patients and family members.

**Access to Quality Care:** We are committed to providing optimum, cost-effective and medically necessary care to our patients. We respect our patients' right to be involved in their plans of care and commit to keeping our patients informed of treatment plans and available treatment alternatives. Our healthcare professionals will provide medically necessary services to patients in a safe and effective manner, supported by proper documentation that supports the services provided.

**Emergency Treatment:** When an individual presents at the hospital, HHC will provide the healthcare services required under the law regardless of their ability to pay. We follow the federal law, Emergency Medical Treatment and Active Labor Act ("EMTALA") in providing an emergency medical screening, examination and necessary stabilization to all patients prior to any transfer or discharge.

### EMTALA TIP:

Always act in the best interest of the patient. When an individual presents at a hospital emergency department, HHC will provide a medical screening examination, stabilize the patient and provide necessary medical treatment regardless of the patients' insurance status or ability to pay. Transfers may only occur upon patient request or in the event that the HHC Facility does not have the capacity or capability to meet the needs of the patient. In all cases, refer to your specific EMTALA policy.



## STANDARD: Privacy and Confidentiality

HHC is committed to protecting the privacy of the health information of our patients. You are required to follow HHC privacy and security policies and state and federal privacy laws. We also are committed to informing patients about their rights with regard to their protected health information (PHI). Through confidentiality agreements, we protect the information shared with our business partners in accordance with laws and standards.

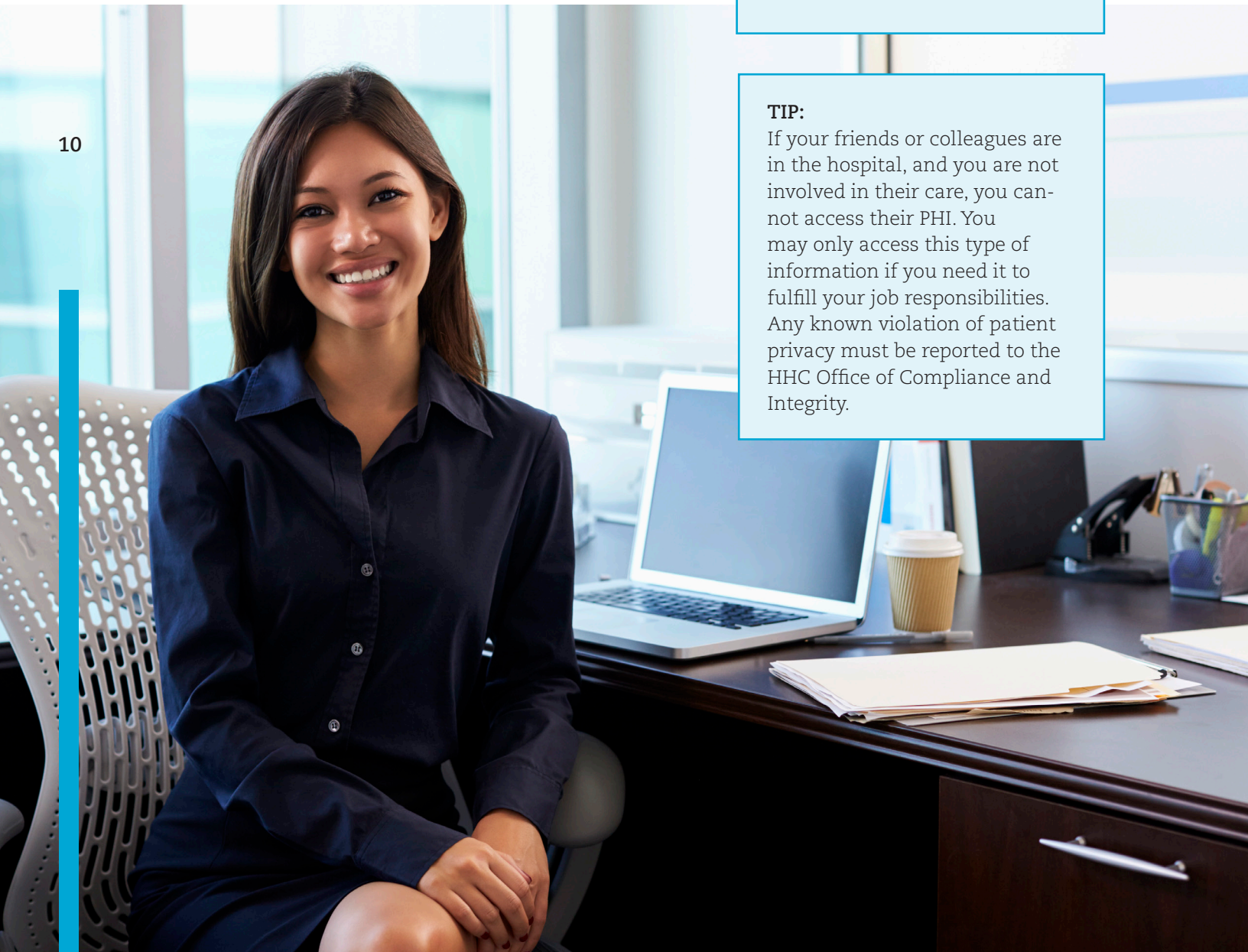
**PHI:** You are expected to safeguard the PHI of patients and respect our patients' confidentiality by using PHI only when it is necessary to serve the patient or as permitted or required by law. Patients have certain rights regarding their PHI. You must familiarize yourself with HHC's policies and procedures and Notices of Privacy Practices to protect the privacy and security of PHI. The HHC Privacy Officer and the Legal Department are available if you have questions or need further guidance related to HIPAA or any other privacy laws.

### What is PHI?

Protected Health Information (**PHI**) includes any individually identifiable information that relates to past, present or future medical or behavioral conditions, treatment or payment that may identify a patient and can be found in many places, including medical records and financial information.

### TIP:

If your friends or colleagues are in the hospital, and you are not involved in their care, you cannot access their PHI. You may only access this type of information if you need it to fulfill your job responsibilities. Any known violation of patient privacy must be reported to the HHC Office of Compliance and Integrity.





**Personal Information:** We respect the personal information of our employees and treat all salary, benefits and personnel files as confidential and only use or access this information for authorized business purposes.

**Proprietary Information:** We do not share confidential information related to HHC business or operations, including financial data, business strategy, pricing, contract terms and proprietary information, unless it is to an authorized person and for a legitimate business reason. If you receive a request from the media for HHC's information, you cannot provide it. HHC policy requires you to refer the media to the identified HHC contact person.

**Use of Electronic Media:** All communication systems provided by HHC, including computers, email, instant messaging, Internet access, telephone and voicemail systems are the property of HHC and are to be used primarily for business purposes. HHC reserves the right to monitor all aspects of the usage of these systems for appropriateness and to ensure the use supports the business goals of HHC.

**Information Security:** You are expected to follow all information security policies; including using and maintaining your own log-in credentials and system passwords in a responsible and confidential manner. You are also expected to use your badge to identify yourself as an HHC Community member and to comply with all HHC information security policies and procedures.

**Social Media:** HHC Community members may use social media in various platforms such as Facebook, LinkedIn, Twitter, blogs, etc., during their personal time. During such use, you are expected to follow all HHC policies, including privacy and confidentiality and not let your use of social media interfere with your job responsibilities. You may not post any protected health information, (PHI) pictures, or comments regarding a patient of HHC.

**INFORMATION SECURITY TIP:**

- Forward any suspicious email to SPAM@hhchealth.org. Cyber criminals use social engineering schemes such as “phishing” to lure individuals into providing them with their network credentials to gain access to confidential patient, business and financial information.
- Email from outside the HHC Network includes a warning at the top of the email. Use extra caution when opening an email from an outside source.

**SOCIAL MEDIA TIP:**

- Refrain from posting any information about a patient, even if you do not believe that it contains PHI. It is possible that someone might be able to identify the patient based on the clues that you provide in your post. Once a patient is identified, all related information becomes PHI.





## STANDARD: Personal Conduct and Business Ethics

HHC is committed to creating and maintaining a workplace that is professional, ethical and respectful. All members of the HHC Community are expected to follow our standards of personal conduct. Be honest and respectful and adhere to ethical standards when dealing with colleagues, staff, patients and their families, the public, auditors and government officials and any others with whom HHC does business. Abusive and disruptive behavior is not tolerated.

**Conflicts of Interest (COI):** All HHC Community members are expected to act in the best interest of the organization and its patients at all times. All HHC Community members must avoid any outside activities that distract or negatively impact their job performance. An individual's position as an HHC Community member cannot be used for personal gain or to assist others unfairly at the expense of HHC. A conflict of interest may occur if outside activities or personal interests influence, or appear to influence, the ability to make objective decisions in the course of performing your responsibilities on behalf of HHC. Employees, members of the medical staff, officers, agents and board members of HHC are required to disclose situations where there is an actual and/or potential conflict of interest in accordance with HHC policy.

### Did you know?

HHC has specific policies on Employee and Physician COI, and Research COI. Contact the Office of Compliance and Integrity with questions related to any COI policy.

HHC has a Conflict of Interest Policy that you are required to review and follow. Any questions about whether an outside activity might be a conflict of interest should be directed to the Office of Compliance and Integrity.

### CONFLICT OF INTEREST TIP:

Always put the business interests of HHC before your own personal interests. Any business or financial arrangement between you or a member of your immediate family and an entity that does business with HHC could potentially constitute a conflict. Likewise acting as a director, partner, consultant, or employee of an organization that is a competitor of HHC or whose mission is contrary to that of HHC may pose a conflict. When in doubt, contact the Office of Compliance and Integrity.



**CONFLICT OF INTEREST SCENARIO:**

The firm my organization uses for marketing and advertising offered me two courtside tickets to a professional basketball game. Can I accept the tickets?

HHC policy requires you to politely decline the acceptance of personal gifts that involve social or entertainment activities. You may accept the tickets, only if you personally pay the supplier the cost of the tickets.



**Gifts and Gratuities:** HHC Community members cannot accept money, gifts, services, entertainment or other items of value which may influence your actions or decisions. HHC has policies on gifts and gratuities and vendor interaction that you must follow.

**Discrimination:** We practice fair and equal treatment of employees, volunteers, patients, families and others by celebrating the diversity of all people, without discrimination on the basis of race, color, national origin, alienage, citizenship, religion, creed, gender, pregnancy, age, physical or mental disability, marital or partnership status, sexual orientation, gender identity or expression of any other characteristic protected by law. You are expected to abide by the Standards of this Code including reporting discrimination, intimidation or violence of any kind that you witness in the workplace.

**Harassment/Sexual Harassment:** Workplace harassment, sexual harassment, comments or other conduct that creates an intimidating or offensive environment will not be tolerated. HHC has adopted policies with respect to workplace and sexual harassment that provide a way for you to bring such improper conduct to the attention of management.

**Stewardship:** We safeguard HHC's assets, including medical records, equipment, supplies, financial data, funds, employee sensitive data, intellectual property rights, research data, business strategies and plans about HHC activities, and not use these assets for personal gain.

**Clinical Research:** Ethics and integrity are essential to the advancement of scientific knowledge. HHC is committed to conducting research in accordance with professional, ethical and legal standards. All patients who are asked and/or choose to participate in a research study are advised of all alternative treatments available to them along with the risks and benefits of the proposed treatments. It is essential that our patients are making informed decisions with respect to research studies.

**Controlled Substances:** Unauthorized access, use or diversion (e.g. theft) of controlled substances is prohibited. Immediately report to your manager or appropriate department any potential issues or concerns you identify involving the security or diversion of controlled substances.

**Fitness for Duty and Drug-Free Environment of Care:** HHC works diligently to maintain an alcohol-free and drug-free environment across our continuum of care. The HHC Community is expected to perform all job duties and responsibilities in a professional manner, free from the influence of alcohol, drugs or other substances which may impair our job performance or judgment. If it is suspected that a member of the HHC Community is under the influence of drugs or alcohol while at work, appropriate drug or alcohol testing may be required. Likewise, any unlawful manufacture, sale, distribution, or possession of any illegal substance on any HHC campus will not be tolerated. Any member of the HHC Community found to be performing any activity for HHC while impaired by or under the influence of alcohol or illegal drugs will be subject to disciplinary action up to and including termination of employment.



## STANDARD: Compliance with Laws and Regulations

HHC business is highly regulated and must be conducted in accordance with laws and regulations. Many laws and regulations pertain to patient referrals, physician relationships, billing and payment practices, vendor contracts, lobbying, environmental health, payor relationships and employment practices. Since healthcare delivery is so highly regulated and some of these laws are very complex, it is important that you attend trainings regularly. The Legal and OCI Departments are also available to assist you in interpreting laws that apply to our business.

**Fraud, Waste and Abuse Laws:** Several laws describe activities that may constitute fraud, waste and abuse, including but not limited to, the False Claims Act, the Anti-Kickback Statute and the Physician Self-Referral Law called the Stark Law. These laws generally prohibit the following:

- Submitting inaccurate or misleading claims for services provided.
- Submitting claims for services not provided.
- Submitting claims for medically unnecessary services not covered by the payor.
- Submitting reports to any federal or state agency with inaccurate information or untimely.
- Making false statements or representations to obtain payment for services or to gain participation in a healthcare program.
- Concealing or improperly avoiding an obligation to repay a health care program.
- Offering money, gifts, goods, services, or anything of value to encourage or reward the referral of patients to a healthcare provider.

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**We do not pay for referrals:** Patient referrals and admissions are based solely on an individual's medical needs and our ability to render the needed services. No one in HHC is allowed to pay or offer payment to anyone for the referral of patients.

**We do not accept payments for referrals:** No one in HHC is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients to HHC. We do not take into account the value or volume of referrals made to us when entering into financial arrangements with other healthcare providers.

### What is the False Claims Act?

A federal law that makes it a crime for any person or organization to "knowingly" make a false record or to file a false claim for payment under any federal or state healthcare program. "Knowingly" means having actual knowledge that a claim is false or acting in deliberate ignorance or with "reckless disregard" as to whether a claim is false.





**Environmental Safety:** HHC promotes health, safety and environmental protection in healthcare facilities planning, administrative activities and research. You are expected to safely handle, store and dispose of hazardous materials and waste if your job responsibilities include such work. Report to your supervisor or to the Office of Compliance and Integrity immediately if you encounter an unsafe practice or condition.

HHC is equally committed to promoting a safe working environment for our employees and physicians. Each HHC employee shares in the responsibility to keep our workplace safe. Employees are provided with information on handling and working with hazardous materials. HHC also provides employees with needed protective equipment and training in its use. It is vital that employees use equipment and materials properly and follow the appropriate procedures to ensure that everything possible is done to avoid compromising the safety of co-workers.

**Cooperation with Government Investigations:** You must treat all government auditors and investigators with respect. In accordance with HHC policy, you must bring any requests for information from the government to the attention of the Legal Department or OCI as soon as possible. Such requests may include subpoenas, civil investigative demands, audit requests, search warrants or informal requests.

**Tax Exempt Status:** HHC is a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code because of our charitable mission. HHC provides healthcare services, charity care and medical education as examples of the types of activities that support our charitable purposes. To maintain this status, HHC follows certain laws and regulations that require it to pay only fair market value for goods and services, not to engage in private inurement or in substantial lobbying activities. You must use our resources to promote our charitable purposes and not inappropriately advance the private or personal interests of an individual or other company. You are expected to avoid compensation arrangements in excess of fair market value.

HHC encourages its employees to participate in community and political affairs and to vote in elections. If you choose to participate in political affairs, please remember to be clear that you are acting as a private citizen and not as a representative of HHC. If you choose to contribute to a political campaign, it must be as an individual and not as a representative of HHC.

**Wage and Hour Standards:** HHC is committed to paying its employees all compensation they are entitled to receive in compliance with applicable state and federal laws. HHC has policies about timekeeping and pay practices. Every HHC employee is responsible for understanding these policies and reporting policy violations.

**Antitrust:** The HHC Community must comply with applicable antitrust and similar laws that regulate competition. Generally speaking, antitrust and competition laws constrain or prohibit discussions or agreements among competitors that restrain trade. Examples of conduct prohibited by the laws include (1) agreements to fix prices, bid rigging, collusion (including price sharing) with competitors; (2) boycotts, certain exclusive dealing and price discrimination agreements; and (3) unfair trade practices including bribery, misappropriation of trade secrets, deception, intimidation and similar unfair practices. Any HHC Community member representing HHC in any business discussions or negotiations is expected to seek advice from the HHC Legal Department when confronted with business decisions involving a risk of violation of the antitrust laws.



## STANDARD: Financial Reporting

As good stewards, members of the HHC Community must strive to protect and preserve the assets of the organization through efficient and effective use of resources. Use of tax exempt earnings or donated funds are required to be properly recorded by reporting the accurate nature of all financial transactions.

**Financial Records:** You must maintain a high level of accuracy and completeness in the documentation and reporting of our organization's financial records. It is important to follow HHC policies which address cost report compliance and our commitment to full, accurate and timely reports to regulatory agencies.

**Management of Donated Funds:** HHC and its member organizations, as non-profit organizations, are being supported by individual, foundation and corporate donors. We have been entrusted with these funds to achieve our mission and we take our duty to use these funds carefully and to meet our responsibilities to donors very seriously. We adhere to the highest standards in the solicitation, acceptance, recording and use of donated funds.



# Compliance & Integrity Resource Guide

## What is the purpose of OCI?

OCI provides a framework for the management of compliance issues, helping to ensure that the HHC community is able to recognize and avoid situations that might compromise HHC's values.

## What is the OCI's mission statement?

To serve as a valued and trusted HHC partner, providing compliance expertise, education and guidance consistent with our values.

## Our Compliance Program serves to:

- Uphold HHC values as defined in its Code of Conduct;
- Provide employees with a central resource for addressing compliance issues;
- Provide employees with information and policies for successful job performance;
- Encourage reporting concerns and resolving issues;
- Minimize the risk of fraud, waste and abuse;
- Demonstrate our commitment to conducting business in an ethical manner;
- Assist the organization in following local, state and federal laws that apply;
- Protect HHC's reputation in the community.

## Resources for Getting Answers

To ask for guidance or to report a concern, there are several options to choose from as noted below. HHC encourages the resolution of issues through the proper channels.

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### Integrity Check: HHC Decision Making Guidelines

**You can first start by asking yourself a series of questions:**

- Is it legal and ethical?
- Is it consistent with our Values and H3W Behaviors?
- Is it in the best interest of our patients?
- Would you feel comfortable or be proud if everyone knew about it?

If you were able to answer "yes" to all of these questions, it is probably safe to proceed. However, if you answered "no" or are unsure at all, it is always best to ask for guidance before proceeding.

## Resource Contact Information

Your Manager.....	Refer to your Department Directory
Human Resources .....	Refer to your Member Organization Intranet site
The HHC Office of Compliance and Integrity (OCI) .....	860.972.1573
The ComplianceLine .....	1.855.442.6241 or ComplianceLine.Hartfordhealthcare.org
HHC Legal Department .....	34143