

# AdventHealth

## **CODE OF CONDUCT**





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## MESSAGE FROM OUR CEO

Our organization impacts thousands of lives, every minute of every day — sharing collective goals, beliefs and principles that guide our choices. Together, with our individual talents and job descriptions, we're working toward a common objective — to improve the quality of life for those we serve. Whether we work in physician offices, research centers, hospitals or home health agencies, we're connected in our daily responsibilities by a personal commitment to honesty, integrity and respect.

Each of us shapes our culture through our words and actions. Simply put, we're the caretakers of our organization's reputation. Our Code of Conduct serves as a cultural compass to do the right thing and provides guidance in complicated situations. If you see something that doesn't meet our standards, please speak up. Whether it's a quality issue or an ethical business question, we want to know about it so we can resolve it.

Living up to the highest standards is more than a goal. Doing the right thing in every situation is more than an ideal. These are our professional responsibilities and our legal obligations. The principles that direct our relationships with patients, fellow team members, business associates and government agencies are not only the highest ethical and legal principles — they are the moral principles of Christianity on which our institution is founded.

Becoming a national leader in health care takes more than medical expertise and advanced technology. It takes heart. With more than 100,000 highly skilled professionals dedicated to delivering exceptional care with uncommon compassion, we want to help you live these values each and every day. Thank you for all you do.



A handwritten signature in dark ink that reads "David A. Banks". The signature is fluid and cursive, with a long horizontal line extending from the end.

David Banks  
President and CEO







# OUR MISSION, VISION AND VALUES

## Our Mission

Our sacred mission of Extending the Healing Ministry of Christ is the foundation for everything we do. AdventHealth's team members also draw motivation from five strongly-held vision statements and values, which serve as a reminder to live our mission every day.

## Our Vision

### Wholistic Care to Help Patients Feel Whole

Our calling is to provide whole-person care that tends to body, mind and spirit, just as Christ did during His earthly ministry. Whether it's lifting your spirits or easing your mind, we believe whole-person healing attends to our physical, emotional, mental and spiritual needs — helping our patients feel whole.

### Exceptional Care at Every Step

As we strive to exemplify Christ's healing, we aim to provide a continuum of care that exceeds expectations to every person, every time. Our team members are here to provide exceptional care at every step in a patient's journey to complete health that includes body, mind and spirit.

### Connecting Patients to the Care They Need

Rather than discharging patients from our care, our compassionate caregivers are committed to partnering with them for life — helping them navigate our connected system. Our team members serve as partners in their care journey through every stage of life and health.

### Dedicated to Delivering Access to Affordable Care

We're on a journey to lower the cost of care while providing quality services. Our community care efforts, affordable care programs and efficiency innovations are some of the ways we put this vision to work for those we serve.

### Innovative, Viable Care That Adapts to Patient Needs

Wholistic, Exceptional, Connected, Affordable, Viable







## Our Values

### Inclusiveness

We celebrate the diverse backgrounds, cultures and experiences of our patients, visitors and colleagues, and we embrace opportunities to learn and grow from new perspectives. Christ loves all, and we strive to include and ensure that all team members — coming from all their varied and beautiful backgrounds — feel part of our team as we find unity in our diversity.

### Quality and Service Excellence

We consistently deliver exceptional care and strive for excellence in all we do.

### Community Well-Being

We are committed to improving the health, prosperity and well-being of the communities we serve.

### High Ethical Standards

We are called to uphold the highest standards, with integrity driving every decision we make and every action we take.

### Stewardship

We are guided by relentless stewardship in the management of the resources entrusted to us.

**We are called to uphold the highest standards, with integrity driving every decision we make and every action we take.**











# OUR COMMITMENT TO ETHICAL CONDUCT AND INTEGRITY

AdventHealth is committed to ensuring the highest ethical conduct and integrity. This Code of Conduct sets forth the standards by which AdventHealth conducts itself as a leader in the health care industry. Our Code of Conduct is designed as a guide for team members individually and for the organization, but it is not intended to be a comprehensive rulebook and cannot address every unique situation. AdventHealth has numerous internal policies that support the overall Code of Conduct and provide guidance on a more detailed level, which can be found on the AdventHealth intranet page. While this Code of Conduct is for employed team members, the principles, practices and ethical standards apply to all who work with or for AdventHealth including physicians, volunteers, researchers, contractors, students and suppliers.



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# PATIENT CARE

## Quality of Care

We're committed to providing quality care that extends the healing ministry of Jesus Christ. We treat everyone we serve with compassion and know it's a privilege to serve them. Our commitment to quality health care includes ensuring our services are medically necessary, and that such care is provided in a safe manner. We are committed to delivering care in a respectful and ethical manner regardless of race, color, national origin, age, disability or sex.

## Patient Rights

Caregivers will provide patients with information regarding their rights and responsibilities. We will make every effort to protect those rights. Our health care providers will inform patients concerning their diagnoses, treatment, alternatives, risks and prognosis. We respect each patient's right to access medical care, treatment or accommodations that are available and medically indicated. We will also ensure that patients know which support services are available, such as interpreter services. Patients have a right to express concerns regarding any aspect of their care through the grievance procedure of the health care provider or location in which they were served.

## Emergency Medical Treatment and Labor Act (EMTALA)

AdventHealth facilities comply with the Emergency Medical Treatment and Labor Act (EMTALA) by providing emergency treatment to all individuals coming to our facilities regardless of their ability to pay. All patients seeking emergency medical care at an AdventHealth hospital have the right to receive a medical screening examination. This exam determines whether the patient has an emergency medical condition or is in active labor. If an emergent medical condition exists, the patient has the right to receive stabilizing treatment within the capability of the facility. AdventHealth hospitals will not delay the medical screening exam or necessary stabilizing treatment to seek financial and personal information. AdventHealth will transfer patients with emergency medical conditions to other hospitals in compliance with state and federal requirements.







## PROTECTING THE PRIVACY OF PATIENT INFORMATION

While providing health care services, AdventHealth collects personal and health information from those we serve. Information such as current and past medical conditions, medications and family history are collected to assist caregivers in providing care and treatment. We also collect personal identifying information like address, phone numbers, email addresses and financial and insurance information. Patient information is protected under the federal Health Insurance Portability and Accountability Act (HIPAA), as well as state laws and regulations. AdventHealth is fully committed to maintaining the privacy and security of patient information. Patient information should only be accessed by those who have the right to obtain it and should only be used or disclosed to perform one's job duties. Any access, use or disclosure of patient information for any purpose other than to fulfill one's job duties is inappropriate and comes with strict disciplinary action.

Most patient information is entered and stored in computer systems. Team members, physicians, volunteers and other authorized individuals are given access to these computer systems using a unique username and password. The sharing of usernames and passwords is not allowed. Users are responsible for any access to patient information made using their username and password and should guard this information carefully.

Patient information is protected under the federal Health Insurance Portability and Accountability Act (HIPAA), as well as state laws and regulations. AdventHealth is fully committed to maintaining the privacy and security of patient information.



We should exercise care and caution whenever we share patient information in person or by mail, fax or email. We must ensure that patient information is protected and only given to the patient or those who have been granted permission to access that information. If you believe patient information may have been given or sent to the wrong person, contact your Regional Compliance Officer immediately to assist in addressing the concern. It is possible a breach of the patient's privacy has occurred and may need to be reported to the patient or appropriate government authorities. When disposing of patient information, always place it in a confidential shredding bin and not in a recycle or trash bin.

**We must ensure that patient information is protected and only given to the patient or those who have been granted permission to access that information.**



I have access to patient information at my facility. I'm curious about a family member or friend's health. **Can I look at their health record?**



**No.** You should only access patient information when it is required to perform your specific job duties. Accessing patient information for any other reason may result in disciplinary action including termination.



My supervisor asked me to **share my username and password** with a new team member until that person receives their own username. Is that OK?



**No.** You should never share your username and password with anyone. You are accountable for any information that is accessed with your username and password. If you feel you cannot approach your supervisor, contact your Regional Compliance Officer for guidance.



I **accidentally provided a patient with someone else's information**. What should I do?



**Contact your manager or Regional Compliance Officer or the Compliance Hotline** right away to determine whether the disclosure of the information has resulted in a breach of patient privacy. Retain any information that was returned to you so it can be used to support an investigation.



I **accidentally emailed** a document that contained **patient information** to the wrong person. What should I do?



**Contact your manager, Regional Compliance Officer or the Compliance Hotline** right away to determine whether the disclosure has resulted in a breach of patient privacy.





## KEY POINTS TO KNOW



- Patient information should only be accessed, used or disclosed to fulfill your specific job duties.
- Never access patient information of family members, friends, co-workers or others for personal use.
- Do not discuss patient information in public areas like hallways, elevators or cafeterias. Lower your voice when discussing patient information in patient care areas that aren't enclosed or where others may hear.
- Never use your personal cell phone to text patient information or to take a picture of a patient or any part of a patient except through an AdventHealth approved app.
- If patient information is given or sent to the wrong person, notify your manager, your Regional Compliance Officer or the Compliance Hotline right away.
- Never share your username and password with anyone, including your supervisor, manager or the AIT Department.
- Do not remove patient information from a facility unless you are required to do so to perform your job duties.
- Dispose of items containing patient information in a shredding bin, not in the recycle bin or trash. For items labeled with patient information (e.g., medication containers, IV bags, patient wristbands), make sure the patient information is illegible before discarding them.



# BILLING AND CODING INTEGRITY

When a patient receives care at an AdventHealth facility, clinical and billing codes are assigned to their care based on the services they received. AdventHealth team members handle the billing of patient care with the highest integrity and in compliance with all federal, state and private health plan requirements. The government is particularly concerned about the integrity of billing for health care services. Certain laws exist to ensure that fraud, waste and abuse do not occur when paying for health care services.

A person commits **fraud** when they knowingly make incorrect statements to gain some kind of benefit. In the health care industry, fraud could occur when a health care provider sends a claim to a health plan to pay for something the patient didn't receive. This can result in increased costs to the government or the patient's health plan.

The word **waste** refers to the inefficient use of resources. In health care, this might mean that a patient is receiving more services than are medically necessary to treat their condition.

The word **abuse** refers to ways in which health care providers might abuse the system for their own gain by finding ways to inappropriately bill the government or other health care payers.

One of the tools the government uses to protect against fraud, waste and abuse is the False Claims Act. This Act states that any person who knowingly submits a "false" claim to the government may be required to pay back three times the amount originally paid in addition to paying significant fines and penalties. In addition to complying with coding and billing requirements, we should also avoid any activity that may give the appearance that we are inappropriately billing for patient services.

The False Claims Act offers a financial reward for individuals, known as whistleblowers, who make reports of fraud on behalf of the government. These individuals may be paid a percentage of the recovery for providing the information.

In addition, the False Claims Act prohibits retaliation against individuals who exercise their rights or obligations under the law. AdventHealth prohibits anyone working for or with the organization from knowingly presenting claims for payment which are false or fraudulent.

## KEY POINTS TO KNOW



- A patient should only receive those services, products and procedures which are medically necessary for their care as determined by their health care provider.
- A patient should never be charged or billed for a service or product they did not receive.
- All procedures performed should be documented using the correct medical codes.





**I'm concerned about the way we're billing patients** for the care they receive. What should I do?



**Tell your manager of your concern or contact your Regional Compliance Officer or the Compliance Hotline** right away. Billing rules and processes can be complex. It is always good to have concerns reviewed to ensure we are billing our patients according to payer and regulatory requirements.

AdventHealth team members handle the billing of patient care with the highest integrity and in compliance with all federal, state and private health plan requirements.

## Non-Profit Organization

AdventHealth is a tax-exempt, non-profit organization under the Internal Revenue Code. AdventHealth is not organized or operated for the benefit of private interests and must comply with all state and federal laws regarding tax-exempt status and engage in activities that further its charitable tax-exempt purpose. By right of its non-profit status, AdventHealth is able to provide significant benefits to the communities it serves. It is important to avoid using AdventHealth resources in a manner that could place its non-profit status at risk.

- Patient condition should be properly diagnosed by their health care provider and the health care provider should be correctly paid based on that diagnosis.
- Care provided to the patient must be documented in the patient's medical record to justify the services provided and the payment received.
- Never submit a claim for payment to the government that you know is false, inaccurate or cannot be supported by appropriate documentation and recognized standards of care.





## RELATIONS WITH PHYSICIANS

### The Physician Self-Referral (Stark) Law and Anti-Kickback Statute

Physicians play an important role in our patients' health care by diagnosing medical conditions and providing care plans and services. Because the physician acts as the gatekeeper for patient care, it's important that AdventHealth maintains appropriate relations with physicians. Health care providers must never offer or give a physician any good or service, including payment, in exchange for the referral of patients to their service.

Two important laws, the Physician Self-Referral Law (also known as the Stark Law) and the Anti-Kickback Statute, provide the legal guidelines around appropriate relations between physicians and the health care providers to whom they refer patients. The Stark Law is the common industry name used to refer to Federal laws that do not allow physician self-referrals of federally funded patients. The Stark Law addresses the inherent conflicts of interest that can exist when a physician gains financially from making decisions about patient care referrals. The federal Anti-Kickback Statute is a criminal statute that does not allow the exchange (or offer to exchange) of anything of value in return for referral of patients to AdventHealth.

### Physician Gifts or Awards

The Stark Law and federal Anti-Kickback Statute also guide how we provide items of value to a physician such as a gift or award. There are limits on the value of gifts or other non-monetary items that can be given to a physician by AdventHealth or its team members under these laws. Before giving a gift to a physician, check with the "Non-monetary Compensation and Medical Staff Incidental Benefits" policy to make sure it's appropriate to give the gift and to ensure that the physician has not already reached their annual limit for receiving such items.

There are numerous criminal and financial penalties for violating the Stark Law and the Anti-Kickback Statute. For more information, contact your Regional Compliance Officer.



I work closely with a physician in our department. His wife recently had a baby and **we would like to give him a gift**. Can we do that?



**Maybe.** There are limits to the value of gifts AdventHealth or its team members can give to physicians or their family members without creating legal risk. Check with your Regional Compliance Officer first who can confirm with the appropriate persons whether the physician has already reached their annual limit.



## KEY POINTS TO KNOW



- Never provide payment to a physician that gives the appearance that we are paying them for patient referrals.
- Do not give a gift to a physician without first checking with the appropriate personnel to ensure that the gift is appropriate and is allowable within legal limits.







# MAINTAINING A RESPECTFUL AND PRODUCTIVE WORK ENVIRONMENT

## Employment Opportunity

AdventHealth strives to build an environment that is inclusive where all team members feel valued, heard and respected. We value the diversity of our workforce and have longstanding policies to ensure equal opportunity in employment to all team members and applicants for employment. We do not allow discrimination on the basis of any legally protected characteristics such as race, color, religion, sex (including pregnancy, gender identity and sexual orientation), national origin, age (40 and over or as otherwise defined by applicable law), disability or genetic information (including family medical history).

## Harassment and Discrimination

You have the right to work in an environment that is safe, productive and free from harassment. AdventHealth does not tolerate any form of harassment or bullying in our workplace. Harassment is unwelcome conduct that is based on race, color, religion, sex, national origin, older age, disability or genetic information.

Sexual harassment is a particular form of prohibited conduct that may include harassment based on sex, gender, gender identity or expression and sexual orientation. Behavior that creates an intimidating, hostile or offensive work environment or that is harassing — including comments or actions of a sexual nature — are never acceptable. For more information related to maintaining a respectful work environment, please see your facility's policies and procedures.



A team member in my department frequently makes **inappropriate jokes** including references of a sexual nature. What should I do?



**Contact your manager or Human Resources representative right away.** You may also report the concern using the Compliance Hotline. AdventHealth strongly supports an environment free from inappropriate workplace conduct, including sexual harassment.





## Maintaining a Safe Work Environment

AdventHealth is committed to providing a safe and healthy work environment for all team members. This includes providing training, education and information to reduce the risk of injury or illness. Immediately notify your supervisor and complete the appropriate reports about any workplace injury so that timely action may be taken to resolve the issue.

If you identify an unsafe condition in the work area, notify your supervisor immediately. For more information related to maintaining a safe work environment, please refer to your facility's safety management policies and procedures.

## Use and Management of Controlled Substances

AdventHealth is a drug- and alcohol-free workplace. The use of illegal drugs and abuse of controlled substances in the workplace is not allowed. Involvement in the unlawful use, sale, manufacture, distribution or possession of controlled substances, illicit drugs or use of alcohol in the workplace, or working under the influence of such substances may result in disciplinary action.

In addition, many team members have access to prescription drugs and controlled substances in the workplace. Prescriptions and controlled substances must be handled properly and only by authorized individuals. If you become aware of inadequate security or unlawful behavior, report this immediately.

AdventHealth strictly enforces the reporting of any misuse of medications by staff or privileged practitioners. For more information related to the use of substances while in the workplace, please refer to your facility's appropriate drug and alcohol policies.

If you're aware of any concerns related to the improper use and handling of drugs while in the job setting, please contact your manager or supervisor immediately. You may also report the concern to your Regional Compliance Officer or through the Compliance Hotline.

## Excluded Individuals and Entities

We will not knowingly employ, contract or affiliate with individuals or entities that have been debarred, excluded or made ineligible to participate in federal or state programs. As a condition of employment, employees are required to notify the Human Resources Department immediately if they are excluded from participating in federal or state programs.



## CONFLICTS OF INTEREST

A conflict of interest can arise any time a team member's personal interests conflict, or may appear to conflict, with the best interests of AdventHealth. Each of us has a duty and obligation to be loyal to our employer. Because our primary focus is our patients' care and well-being, team members must be able to make decisions that are free from bias, personal interests and actual or perceived conflicts of interest. If you have any questions as to whether an outside activity or private interest might create a conflict of interest, contact your Regional Compliance Officer for guidance. The following are some examples of potential conflicts of interest.

A conflict of interest can arise any time a team member's personal interests conflict, or may appear to conflict, with the best interests of AdventHealth.



## Relations With Vendors, Suppliers, Contractors and Consultants

AdventHealth works with many vendors, suppliers, contractors and consultants. Sometimes these outside organizations will offer gifts or entertainment to team members as a means of promoting their business with AdventHealth. Certain gifts may pose ethical issues. You should not accept gifts, business courtesies or favors from vendors, suppliers or contractors. Receiving or offering gifts could violate state or federal law, including the Anti-Kickback Statute, and present a conflict of interest. For more information on accepting gifts from outside organizations, refer to AdventHealth's Gifts, Entertainment, Favors and Business Courtesies policy.

## Relations With Post-Acute Care Providers

When patients leave the care of an AdventHealth facility, they are sometimes referred to other post-acute care providers such as home health, hospice, skilled nursing or ambulance transport. Team members must not accept gifts or entertainment from post-acute care providers to avoid the appearance of inappropriately being rewarded for the referral of patients. Patients have the right to choose their health care provider without undue influence from AdventHealth or other caregivers.

If you encounter a situation where a vendor or post-acute care provider is pressuring you or another team member to accept a gift or entertainment, contact your Regional Compliance Officer for assistance.



A representative from a home health company dropped off several **gift cards** for a local spa **for our department** as an expression of gratitude for referring patients to their service. Can we accept these?



**No.** Team members may not accept gifts from health care providers to whom AdventHealth refers patients as it could create a conflict of interest and risk violating the Anti-Kickback Statute. Politely thank the home health representative for the gesture, but ask them not to give the gift cards to the department.

## Outside Business Interests

Some team members may be involved in personal outside business ventures, such as acting as a sales representative for a consumable product, selling items as part of a hobby, involvement in civic or political groups or outside employment with another company (known as moonlighting). Your outside business ventures must not conflict with your role at AdventHealth. You should never spend time in your role at AdventHealth or use AdventHealth resources engaging in activities that support outside business ventures or interests, nor should such activities negatively impact your ability to perform your role with AdventHealth. Consult your Regional Compliance Officer for guidance on addressing these situations.



I work as a nurse in an AdventHealth hospital. I also work as a sales representative for a cosmetic company on the side. **Can I share information about the products I sell at AdventHealth?**



**No.** You may not conduct personal business on AdventHealth time or in AdventHealth locations.

## Relations with Patients and Their Families

AdventHealth works hard to treat patients fairly, equitably and with the highest quality of care. Team members must ensure their relationships with patients, or their family members, are maintained at an appropriate distance. On occasion, patients or their family members may want to express their appreciation by giving team members gifts. You must not accept gifts that may create a conflict with fairly and equitably providing care to all patients. You must never accept monetary gifts (including gift cards) from patients or their family members. Gifts that are of low dollar value, perishable and are shared with the entire department, such as food items or flowers, are acceptable. If a patient desires to give a gift, refer them to the AdventHealth foundation to make a donation.



### KEY POINTS TO KNOW



- Politely decline offerings of gifts from vendors or suppliers or outside health care providers not otherwise allowed under our policies.
- Do not spend time while at work promoting a personal business venture, hobby or involvement in civic or political activities.
- Direct patients or family members to an AdventHealth foundation to express their appreciation for the high quality care they received if they wish to give a gift.



# MARKETING AND ADVERTISING

We engage in marketing, advertising and communications activities to educate the public, provide information to the community, increase awareness of our services and recruit team members. We offer factual and transparent information to the general public, without distorting the truth, making false claims, engaging in comparative advertising or employing disparaging tactics against other providers of services.

We will only enter into open, honest agreements that are not intended to fix prices or reduce price competition, while complying with applicable legislative and ethical guidelines related to marketing activities.

Third party vendors and contractors may not use or associate our name, symbols, logos or trademarks in external materials without prior consent from our Corporate Brand Management Department. We will not use or disclose patient information for the purposes of marketing without written authorization from the patient.

## Use of Social Media

When using social media sites for personal use during non-work hours, AdventHealth expects team members to act responsibly. Team members may not post proprietary, patient or confidential information on social media sites.

It is inappropriate to associate AdventHealth in social media posts to solicit or endorse a personal business venture or political candidate. If you see an inappropriate post or if you have questions prior to posting something yourself, contact the AdventHealth Marketing team or Human Resources. For more information on guidelines around social media use, please refer to AdventHealth's social media policies.

### KEY POINTS TO KNOW



- Never post information, pictures or images about a patient in a social media post. Even if the name of the patient is not mentioned, it could still result in a breach of patient privacy.
- Be responsible in your use of social media. As a team member of AdventHealth, you represent the values of our organization.

## Promoting Price Transparency

AdventHealth is committed to helping patients understand the cost of health care services they receive. We comply with federal price transparency laws which require hospitals to provide information on their public website to help patients understand the costs associated with their care.





Advent Health







# YOUR RESOURCES

## The Compliance Program

AdventHealth's Compliance Program is designed to establish a culture that promotes prevention, detection and resolution of conduct that is not consistent with this Code of Conduct, or which does not conform with federal and state laws.

## Leadership Role

Our leaders set examples, serve as role models and exercise their responsibilities in a manner that is kind, compassionate, thoughtful and respectful. Leaders are encouraged to promote an environment where team members feel comfortable to express concerns, ask questions and propose ideas. Managers take prompt, appropriate action when concerns are expressed or questions are raised and may obtain assistance from their Regional Compliance Officer.

## Asking Questions and Reporting Concerns

AdventHealth has an open-door policy that encourages team members to ask questions or express concerns about suspected violations of federal, state and local laws or our Code of Conduct. You are encouraged to contact your immediate supervisor, your Regional Compliance Officer or the Corporate Compliance Department regarding any question or suspected violation of legal or regulatory requirements.

For more information on reporting concerns, please refer to AdventHealth's policy titled "Responsibility to Report Unethical or Illegal Conduct" found on the AdventHealth Compliance intranet site.

## Non-Retaliation Policy

On occasion, a team member may hesitate to report suspicious activity for fear of retaliation. AdventHealth prohibits any form of retaliation against a team member who reports, in good faith, acts of misconduct or wrongdoing. Retaliating against someone for expressing a concern may result in disciplinary action.

For more information, please refer to AdventHealth's Non-Retaliation policy found on the Compliance intranet site.



Compliance  
has a voice.  
It's yours!



## The Compliance Hotline

AdventHealth maintains a Compliance Hotline as an alternative reporting mechanism if you observe situations that are not consistent with our Code of Conduct or applicable rules and regulations. The Compliance Hotline is available 24 hours a day, 365 days a year, and is managed by an external company, which helps ensure that information received through the Compliance Hotline will be confidential.

The Compliance Hotline service is available by calling **1-888-924-8433**, or online by visiting **[adventhealth.ethicspoint.com](https://adventhealth.ethicspoint.com)** and clicking on the “Report a Concern” button. You may also submit an anonymous call or report without disclosing your identity. All reports made to the Compliance Hotline are forwarded to the AdventHealth Corporate Compliance Department for review, and investigation when appropriate.

Consider reporting concerns through the Compliance Hotline if:

- You do not feel comfortable talking with your supervisor about a suspected wrongdoing
- You expressed a concern to your supervisor, but you don’t feel it was addressed
- You notice wrongdoing outside of your department or supervisor’s scope of authority
- You’re more comfortable remaining anonymous
- You feel your employment may be at risk for making a report

If you have any questions related to AdventHealth’s Code of Conduct, please contact the Senior Vice President, Chief Compliance Officer in the Corporate Compliance Department. AdventHealth reserves the right to update this Code of Conduct at any time as policies and procedures or legal and regulatory requirements change.



I’m concerned about **a regulatory or legal requirement that we’re not following in my department**, but I do not feel comfortable discussing it with my manager. What should I do?



If you don’t feel comfortable bringing an issue to **your manager’s attention**, for any reason, you may contact your **Regional Compliance Officer**. You may also use the **Compliance Hotline** available by phone and on the Internet.

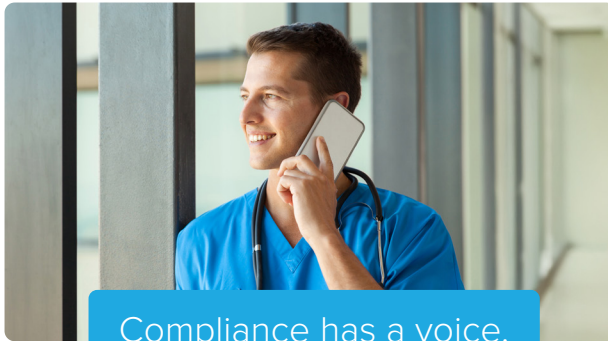


I want to report a policy violation but **don’t want to reveal my identity**. How can I do this?



**The Compliance Hotline allows you to ask questions or report concerns anonymously** — you don’t have to reveal your identity. Just remember, it may be difficult for AdventHealth to follow up on your concern if you don’t provide enough information to begin a proper investigation. You may receive follow-up requests asking for more information through the Compliance Hotline service, which will still allow you to remain anonymous. Keep in mind, your identity might be made known based on the nature of your call or the kind of information you provide. Every effort will be made to protect the anonymity of reports made through the Compliance Hotline.

Compliance has a voice.  
**IT'S YOURS.**



Compliance has a voice.  
**IT'S YOURS.**

If you have concerns about activities that are not consistent with AdventHealth's mission, values, Code of Conduct, policies or laws and regulations, please speak up and report your concerns.

**Call the AdventHealth Compliance Hotline**

**888-924-8433**

or by visiting [AdventHealth.EthicsPoint.com](https://AdventHealth.EthicsPoint.com)

You can choose to express any concerns anonymously. Please report inappropriate interpersonal behavior to your manager or Human Resources representative. AdventHealth policy prohibits retaliation against individuals who report concerns in good faith.

You may also contact the Department of Health and Human Services' Office of Inspector General hotline at 800-HHS-TIPS or 800-447-8477.



Scan to visit  
[AdventHealth.EthicsPoint.com](https://AdventHealth.EthicsPoint.com)

 **AdventHealth**





900 Hope Way, Altamonte Springs, FL 32714  
[AdventHealth.com](http://AdventHealth.com)