

Stamford Health

Code of Conduct

An Employee's Guide to Living Our Values



STAMFORD HEALTH
Healing. Reimagined.



Dear Staff,

As an organization, one of the principal guidelines we use to demonstrate our commitment to upholding the trust and confidence of the community is the code of conduct we all adhere to on a daily basis. The code impacts everyone associated with Stamford Health — our employees, contractors, members of the medical staff, students and volunteers.

This code, which enhances the organization's high ethical standards, has been developed and adopted by our Board of Directors to state clearly the behaviors that all of us will follow and look for in the conduct of others. As you will see, the code is grounded in Stamford Health's core values — teamwork, compassion, integrity, respect and accountability — with the understanding that those who follow its guidelines will truly be living our values in all they do here.

As always, if you have questions or concerns on any compliance matters, you can contact our Corporate Compliance Officer at ext. 7533, or you can make an anonymous call 365 days a year, 24 hours a day through the confidential compliance hotline at 1.800.826.6762.

Kathleen A. Silard
President & CEO

Introduction

Stamford Health is committed to ensuring that all employees share in the responsibility for keeping the System in full compliance with all laws and regulations governing ethical business practices. This brochure explains the expected behavior and conduct of all employees, volunteers, members of the Board of Directors and members of the System's medical staff in our workplace.

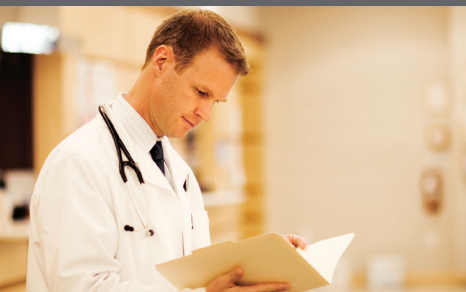
This is your copy of the System's Code of Conduct. It has been designed to be a clear and concise guide. Please familiarize yourself with it to ensure understanding.

This Code of Conduct addresses various issues including the following:

- Patient care
- Confidentiality
- Compliance with laws and regulations
- Vendor interaction
- Conflicts of interest
- Coding and billing integrity
- Workplace safety
- Workplace conduct including discrimination
- Protection of assets
- Use of patient information

This Code of Conduct is a broad guideline that is reinforced in greater detail by the various policy and procedure manuals utilized throughout Stamford Health. It is the responsibility of every employee, volunteer, member of the Board of Directors and medical staff member to act in a manner consistent with this Code, the values and principles it expresses, and its supporting policies.

The System's Code of Conduct is a "living document" that will be updated periodically. If you have suggestions, recommendations or ideas for improving the Code, please contact the Corporate Compliance office at 203.276.7533.



Stamford Health will:

Provide Excellent Patient Care.

Providing quality care, while respecting the rights of patients, is the central focus of the System. We are committed to providing services that meet and exceed patient expectations while focusing on continuous improvement of quality. Stamford Health employees will treat everyone with a spirit of kindness, patience and understanding. Each patient should be respected, with their needs and desires considered as healthcare decisions are made. Steps shall be taken so that each patient understands his or her treatment needs and options, treatment methods utilized and treatment outcomes. Stamford Health will provide services in a manner that does not discriminate against any person because of age, race, religion, gender, sexual orientation, disability, national origin, ability to pay or for any other reason prohibited by applicable Federal and State law. At all times, competent and qualified individuals will provide appropriate, medically necessary care, while considering the safety and well-being of patients.

Stamford Health shall provide an appropriate medical screening examination to any individual who seeks emergency medical treatment, regardless of ability to pay, and such further medical examination or treatment as required to stabilize any emergency medical condition, or provide a medically appropriate transfer, and will not delay a medical screening examination, or any further examination and treatment required, in order to inquire about the individual's method of payment, ability to pay or insurance status.

Protect Confidential Information. Stamford Health is committed to maintaining the confidentiality of patient, personnel, financial and other proprietary information in accordance with applicable legal and ethical standards. Any use or disclosure of any patient information that is not in compliance with Federal and State law, and the System's policies and procedures, is strictly prohibited.

Comply with the Laws, Regulations and Accreditation and Internal Standards. Stamford Health is subject to numerous local, Federal and State laws, regulations and internal standards pertaining to all aspects of its operation. All employees must be knowledgeable about, and ensure compliance with, all laws and regulations applicable to the performance of

their job, and performance evaluations will take these factors into account. It is the responsibility of each employee to immediately report any violations or suspected violations of any legal requirements or accreditation standards to a supervisor, administrator and/or the Compliance Officer. All employees will deal with accrediting and regulatory bodies in a direct, open and honest manner.



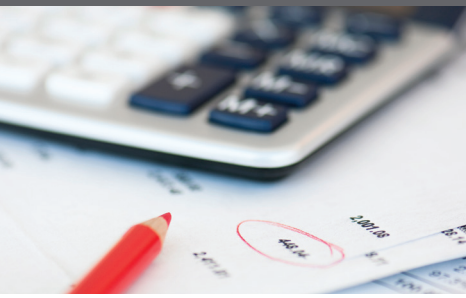
Adhere to Anti-Referral and Healthcare Fraud and Abuse Legislation.

All employees of Stamford Health are required to comply with any and all laws which prohibit healthcare fraud and abuse. We shall not engage in any illegal or unethical business practices. Contractual/financial arrangements with physicians, vendors, third party payors, managed care organizations or other referral sources will be structured to ensure compliance with applicable Federal and State laws and regulations, fulfill the mission of Stamford Health, and be in the best interests of the System and the patients we serve. Stamford Health expects employees to refrain from conduct that violates Federal and State anti-kickback statutes, as well as the “Stark” physician self-referral laws and regulations. Simply put, we do not pay for referrals or otherwise unlawfully attempt to induce referrals.

Activities that are prohibited include, but are not limited to:

- Intentionally or knowingly making false or fraudulent claims for payment or approval;
- Offering or receiving anything of value (cash or in kind) as an inducement to make a referral for the furnishing of any item or service;
- Offering or receiving anything of value (cash or in kind) as an inducement or in return for the purchasing, leasing, ordering or arranging for or recommending the purchasing of any goods, facility, service or item; and
- Submitting false information for the purpose of gaining or retaining the right to participate in a plan or obtain reimbursement for services.

Avoid Inappropriate Gifts & Gratuities. Employees are prohibited from soliciting or accepting tips, personal gratuities or gifts from patients, vendors, contractors and other third parties. If there is any question as to whether a gift complies with Stamford Health policies, the employee should seek



prior approval from the Corporate Compliance Office or refuse the gift and promptly return it to the vendor or patient. Employees shall not offer or give money, services or other things of value with the expectation of influencing

the judgment or decision-making process of any purchaser, vendor, patient, governmental official or any other person.

Avoid Conflicts of Interest. It is the policy of Stamford Health 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 Stamford Health, or its patients. Employees are expected to conduct the business of the System to the best of their ability and for the benefit of the System and its patients. Employees must be careful not to create any conflicts of interest (actual or perceived).

The policy also requires board members, officers, senior leaders, medical staff leaders, committee members and other individuals as appropriate to disclose any potential conflict of interest they or their immediate family may have, including any interest in or relationship with any individual or organization which does business with Stamford Health or which competes with Stamford Health.

Stamford Health manages its contractor and supplier relationships in a fair and reasonable manner, consistent with all applicable laws and good business practices. Our selection of contractors, suppliers, and vendors will be made on the basis of objective criteria, and not on personal relationships and friendships.

Ensure Coding and Billing Integrity. Stamford Health is committed to the proposition that all payments and other transactions must be properly documented and authorized by management. Employees are expected to adhere to the rules and regulations regarding documentation. All transactions must be accurately and completely supported in the System's books and records. Further, all billing practices and compilation of, and filing of, cost reports must comply with all Federal and State laws and regulations. Activities that are prohibited include but are not limited to:

- Knowingly submitting a claim or bill for services that were not rendered or accurately described on the claim form or statement, nor shall we misrepresent services which were rendered, or alter a medical record;

- Submitting a claim requesting payment or billing a third party for medically unnecessary services, or seeking reimbursement for a service that is not warranted by the patient's current medical condition as documented in the medical record and physician's orders;
- Knowingly submitting claims for payment that have not been properly coded, documented or billed according to applicable laws and regulations;
- Submitting bills in a piecemeal or fragmented fashion to maximize reimbursement for various tests or procedures that are required to be billed together and therefore at a reduced cost ("unbundling"), nor billing separately for each component of a group of procedures that are commonly used together for which Medicare and/or Medicaid provides a special reimbursement rate; or
- Submitting more than one claim for the same service or submitting a bill to more than one primary payor at the same time ("duplicate billing").



Employees shall assist Stamford Health in identifying and appropriately resolving any coding and billing issues or concerns identified. Stamford Health will refund overpayments made by a Federal healthcare program or other payor.

Keep Accurate and Complete Records. It is essential that Stamford Health report accurate information to governmental entities and other third parties. In order to meet this obligation, it is equally essential that every employee accurately and clearly report the relevant facts or the true nature of a transaction. No employee should knowingly or with reckless disregard for the truth make any false or misleading statement on any form or to any other officer, employee or auditor for Stamford Health. All patient records must meet the documentation standards required for quality care and to meet reimbursement regulations. Employee travel and entertainment-related expenses must be accurately documented and supported when seeking reimbursement. All medical and business documents and records are retained in accordance with the law and Stamford Health's record retention policy.



Conduct Political Activities According to the Law. Stamford Health expects each of its employees to refrain from engaging in activity that may jeopardize the tax exempt status of the System. Stamford Health funds or resources may not be used to contribute

to political campaigns or for gifts or payment to any political party or any political organization. Stamford Health does not participate or intervene in (including the publishing or distributing of statements) any political campaign on behalf of or in opposition to any candidate for public office. While the System supports employee participation in the political process, employees are not permitted to use positions in Stamford Health to try to influence the personal decisions of others to contribute or otherwise support political parties or candidates except as lawfully permitted through political action committees. Stamford Health may participate in lobbying activities or advocate the passage or defeat of certain legislation that pertains to issues that affect the healthcare community and as such complies with the state's ethics requirements. Lobbying activities, or advocating the passage or defeat of certain legislation, shall not constitute a substantial part of the activities of Stamford Health.

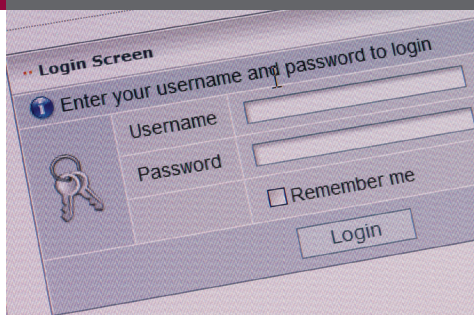
Protect the Environment. It is the policy of Stamford Health to comply with all Federal and State laws protecting the environment. Employees shall dispose of all waste and other materials and store all chemicals and substances in accordance with applicable laws and regulations. It is important to file all necessary environmental reports accurately and promptly and to cooperate fully with all governmental authorities in the event of an environmental incident.

Provide a Safe Workplace. It is the policy of Stamford Health to comply with all applicable Federal and State laws designed to improve workplace safety. Stamford Health is committed to training employees to carry out their work in a manner that is safe for them, their coworkers and the patients they serve. We shall ensure high-quality healthcare through the provision of educational training and teaching experiences for all employees.

Not Tolerate Harassment or Discrimination. Stamford Health is committed to a diverse workplace in which every employee feels comfortable. To that end,

Stamford Health strictly prohibits discrimination and harassment on the basis of race, color, gender (including pregnancy), religion, national origin, citizenship, age, disability, marital status, sexual orientation, gender expression/identity, genetics or any other basis protected by state or federal law. Stamford Health will not tolerate discrimination against candidates for employment or employees in the terms and conditions of employment based upon their membership in a protected class. Similarly, conduct or communications that are sexual in nature and/or that could be viewed as offensive or disparaging to another based upon protected class status have no place at Stamford Health. An individual's motivations are irrelevant as is their position within the organization. Any employee who is subjected to or witnesses discrimination or harassment, including by a supervisor, a co-worker, a vendor, a patient, a member of the medical staff, or a visitor, should promptly report it to his or her direct supervisor, a Human Resources Partner or the Director, Human Resources. Such reports will be promptly investigated and handled as confidentially as possible under the circumstances. Anyone found engaging in this prohibited conduct will be subject to corrective action up to and including immediate termination of employment. Retaliation for raising concerns or for cooperating in an investigation of potential unlawful discrimination or harassment is unlawful, prohibited and will not be tolerated by Stamford Health.

Safeguard and Appropriately Use Assets. All employees are charged with protecting and preserving Stamford Health's assets and resources by following procedures to prevent their loss, theft or unauthorized use. Further, Stamford Health and its employees must make every effort possible to ensure that the property of our patients is safeguarded. Stamford Health shall ensure that the assets of the System are used properly and in a manner that supports the best interests of the organization and its patients. No part of the net earnings of Stamford Health shall be used for the benefit of, or be distributed to, its directors, executive staff, employees or other private persons having directly or indirectly any personal or private interest in the activities of Stamford Health except to the extent that such payments constitute reasonable compensation for services rendered in the necessary course of Stamford Health's business.





Protect Access to Information Systems.

Stamford Health is committed to protecting all aspects of its information systems. All employees and other associates with access to Stamford Health's computerized information system shall abide by Stamford

Health's policies, including the protection of confidential user-IDs and passwords. All computers, PDAs, pagers, communication systems, electronic mail, fax, networks (including internet access) and voicemail are the property of Stamford Health and are to be used for business purposes only.

Adhere to Intellectual Property Laws. Stamford Health is committed to adhering to all applicable intellectual property laws. All software used in connection with Stamford Health's business must be properly licensed and used in accordance with that license. Additionally, Stamford Health will respect the intellectual property and copyright laws regarding books, trade journals, magazines and other applicable resources.

Vendor Interaction

From time to time it may be necessary for a vendor to provide on-campus support or training related to a product or service that it currently furnishes to Stamford Health. Vendor-sponsored training and education should be conducted on or near a campus of Stamford Health unless the training is consistent with the contract terms and requires staff to participate in training offsite. Stamford Health may participate in vendor-sponsored training, however meals cannot be provided. Stamford Health will develop its CME activities independent of any commercial interest. This includes activities held either on Stamford Health sites or at offsite venues and all functions that propose to use the Stamford Health name. This also includes payments from third-party sources or for-profit course organizers who have received industry support. Employed physicians and staff are discouraged from attending industry-sponsored dinners or social events off-campus unless these events meet the ACCME standards for accredited GME/CME activities. Invitations for industry-sponsored dinners or social events may not be posted nor forwarded, hard copy or electronic, to any department.

Non-Retaliation Policy

Stamford Health will protect any employee who reports a concern in good faith. While you are accountable for your own wrongdoing, Stamford Health will discipline anyone who retaliates against you for reporting a concern in good faith. Report any retaliation or harassment immediately to your supervisor, other management, the Compliance Office or the Compliance Hotline.



How to Report a Suspected Violation

If you feel uncomfortable about your activities or those of others around you and feel hesitant about making a report in person, or if you wish to obtain guidance on ethics or compliance issues, or if you are unsure about reporting a suspected violation, **you may take any of the following actions:**

- **CONTACT** your direct supervisor
- **VOICE YOUR CONCERN** to the next supervisory level up to and including the highest level of management
- **CONTACT THE HUMAN RESOURCES DEPARTMENT** if the issue involves a human resource concern such as work conditions, discrimination or harassment
- **REPORTS REGARDING EXECUTIVE LEADERSHIP**, excluding the President /Chief Executive Officer (CEO), may be made directly to the President /CEO of Stamford Health. Reports regarding the President/CEO may be made directly to the Chair, Audit Committee of the Stamford Health Board.
- **CALL OR EMAIL** the Stamford Health Compliance Officer at 203.276.7533 or compliancequestions@stamhealth.org
- **CALL THE COMPLIANCE HOTLINE** 365 days, 24 hours a day to make an anonymous report at 1.800.826.6762. The hotline is outsourced to an independent company that has trained professional personnel available to speak with you. The hotline is not set up for caller ID and cannot trace calls.

You are not required to identify yourself. Information you provide will remain confidential to the extent possible.



As a Planetree hospital, we are committed to personalizing, humanizing and demystifying the healthcare experience for patients and their families. Our approach is holistic and encourages healing in all dimensions — mind, body and spirit.

**Stamford Health
Bennett Medical Center**

One Hospital Plaza
PO Box 9317
Stamford, CT 06904
Phone: 203.276.1000

StamfordHealth.org

Affiliate: Columbia University College
of Physicians and Surgeons
A Planetree Hospital

