SOUTHERN NEW ENGLAND
HEALTHCARE ORGANIZATION, INC.
(SoNE HEALTH)

# Code of Conduct

# Our Mission

Together with our provider and hospital partners, SoNE HEALTH will optimize the health of our patients and communities.

# Our Vision

Our vision is to be Southern New England's premier population health organization dedicated to optimizing the health of patients, populations and communities that entrust us with their care.

Our vision is to be Southern New England's premier population health organization dedicated to optimizing the health of patients, populations and communities that entrust us with their care.

# Our Values

**Empathy:** We approach our work with humanity and a concern for all individuals.
**Collaborative**: We understand the impact of our work is greater when conducted with a spirit of collaboration.
**Honor:** Through our work and in our interactions, we act with courtesy, respect, and dignity.
**Inclusive:** We respect and honor the unique qualities of each individual and seek to improve the health and well-being for all of whom we serve.
**Safety:** We embrace a culture that prevents harm, nurtures healing, and fosters a safe environment for all.

**Contents**


| | |
|---|---|
| **A Message from the President and CEO** | **4** |
| **INTRODUCTION** | **5** |
| Responsibilities of All Who Serve in SoNE HEALTH | 5 |
| Responsibilities of Leaders | 5 |
| Violations of Our Code of Conduct | 6 |
| **CODE OF CONDUCT: SUPPORTING THE RIGHT RELATIOSNHIPS** | **6** |
| Relationships with Those We Serve | 6 |
| Relationships with Coworkers and Others That Serve With Us | 10 |
| Relationships with Suppliers and Other Business Partners | 14 |
| Relationships with Regulators and Those Who Pay for Our | 18 |
| Relationships with Our Network and Communities We Serve | 25 |
| **RESOURCES TO ASSIST YOU** | **29** |
| Where to Find Help | 29 |
| Compliance Hotline | 30 |
| Obligation to Speak Up | 30 |
| Non-Retaliation Policy | 31 |
| Acknowledgment Process | 31 |

## A Message from the President and CEO

Dear SoNE HEALTH Colleague:

SoNE HEALTH's Mission calls us to optimize the health of our patients and communities. Everything we do is built around creating a trusting relationship with every person, in whatever manner they may connect with us: as a patient, provider, hospital partner, or member of our community. Respect for those we serve, and for each other, is foundational to our success and should be part of the work we do each and every day.

Our reputation and the trust that our network places in us is our most valuable asset. As part of our commitment to building and preserving that trust, SoNE HEALTH has established an Integrity & Compliance Program to assist all colleagues in understanding and following the laws, regulations, professional standards and ethical commitments that apply to our organization. This Code of Conduct is an important resource to help each of us, and our organization, fulfill these obligations.

The Code of Conduct describes behaviors and actions expected of all who work at SoNE HEALTH. We expect our employees, Board members, network, and those who do business with us, to know and follow it. While not intended to address all possible legal, regulatory or ethical issues, the Code of Conduct addresses the more common issues and questions you may encounter in your work. It provides resources to assist you when you have questions or need further assistance, and it explains your duty to speak up and report, without fear of retaliation, any matters you believe may be a violation of our Code of Conduct.

At SoNE HEALTH, we are committed to carrying out our Mission with the highest standards of ethical behavior. Thank you for your dedication and commitment to this very important effort.

Lisa Trumble
President and CEO

## INTRODUCTION

### Responsibilities of All Who Serve in SoNE HEALTH[1]

This Code of Conduct outlines responsibilities expected of all who work in SoNE HEALTH. The Code of Conduct applies to all SoNE HEALTH organizations, employees, volunteers, shareholders, providers, network participants, suppliers, independent contractors, consultants, and other business partners that work for or provide goods and services to our organization.

All who serve in SoNE HEALTH play an important role in supporting our Code of Conduct and are responsible to:

- Review and follow the Code of Conduct, paying particular attention to those areas that apply to your daily work.
- Ask questions and seek guidance when you are uncertain what to do. See *Resources to Assist You* (page 29) for a listing of resources available to answer your questions.
- Speak up and report concerns about actions or behaviors you encounter in SoNE HEALTH that may be inconsistent with our Code of Conduct. There are many options available to you to report issues and concerns, including your supervisor, a higher-level manager, Human Resources, the Chief Compliance & Privacy Officer. However, if you are not comfortable using these resources, or if the resources used have not fully resolved your concern, please contact the SOHO HEALTH Confidential Compliance Hotline. You may choose to remain anonymous, and all calls are treated confidentially. See *Resources to Assist You* (page 29) for more information.
- Participate in periodic training programs to further your understanding of our Code of Conduct, its application to your work in SoNE HEALTH, and your responsibilities.

### Responsibilities of Leaders

While all colleagues are required to follow our Code of Conduct, leaders in SoNE Health, including all individuals in a position of supervisory responsibility, are held to a high standard of responsibility. We expect our leaders to set the example, to serve as a role model in every respect for the Code of Conduct. Leaders serve a key role in receiving and responding to questions and concerns raised by colleagues and others they lead. How leaders respond to questions and concerns posed to them is critically important to ensuring that those they lead have the trust and confidence to bring important matters to their attention.

Leaders in SoNE HEALTH have a responsibility to:

- Serve as a role model for supporting our Mission.
- Set a personal example for modeling high ethical standards in the performance of their duties.
- Clearly communicate expectations for high standards of ethical behavior to those they lead.

[1] Throughout this document, references to SoNE HEALTH refer to Southern New England Healthcare Organization, Inc. and all of its affiliates and subsidiaries.

- Promote a culture of trust, open communication and respect.
- Ensure those they lead understand and apply the guidance set forth in our Code of Conduct and hold them accountable.
- Encourage those they lead to ask questions and raise issues and concerns.
- Respond timely and appropriately when matters are brought to their attention.
- Comply with SoNE HEALTH's non-retaliation policies and procedures.

**Violations of Our Code of Conduct**

The standards set forth in our Code of Conduct are mandatory and must be followed. All colleagues and others who serve in SoNE HEALTH are expected to use common sense and good judgment in their personal behaviors and SoNE HEALTH work activities consistent with the standards outlined in the Code of Conduct. Individuals will be held accountable for behaviors and actions inconsistent with the Code of Conduct. The precise discipline taken will depend on the nature, severity and frequency of the violation and may result in oral or written warnings, suspension or termination.

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

- Knowingly authorizing or participating in a violation of law and regulations.
- Withholding information or failing to report violations.
- Deliberately falsifying documentation in medical records.
- Leaders, supervisors or managers that fail to provide adequate supervision or display lack of diligence in assuring compliance with law, regulation, policy or the Code of Conduct.
- Retaliating against individuals who report issues and concerns in good faith.
- Deliberately filing false or frivolous reports of violations.
- Actions that are discriminatory or rise to the level of harassment.
- Reckless actions or behaviors that jeopardize the privacy and security of personal health information and other confidential business information.

## CODE OF CONDUCT: SUPPORTING THE RIGHT RELATIONSHIPS

Virtually everything we do in SoNE HEALTH is dependent on maintaining relationships: with our patients, their family members, our network, and our communities; with co-workers and others who serve with us; with suppliers, business partners, and others we rely upon for needed goods and services; with regulators that oversee our industry, and with federal and state health care programs, commercial insurers and others that pay for the services we deliver. Maintaining these relationships is essential to fulfilling our Mission.

Successful, long-term relationships are ultimately built on trust. Maintaining trust is dependent on our behaviors and actions. Acting with integrity, being honest, and following all laws and regulations are behaviors and actions that build and maintain trust.

**Relationships with Those We Serve**

SoNE Health exists to optimize the health of our patients and our communities. Patients, their family members and loved ones, and others who entrust their care to us are our number one priority. Whether you are directly involved in the delivery of care management services, or serve in a supporting role, you are expected to:

- Deliver people-centered, quality services with compassion, dignity and respect for each individual.
- Commit to safety: every patient, every time.
- Speak up when you see a quality or safety issue and discuss mistakes you see with others so we can learn how to prevent future mistakes.
- Deliver services without regard to race, color, religion, gender, sexual orientation, marital status, national origin, citizenship, age, disability, genetic information, payer source, ability to pay, or any other characteristic protected by law.
- Maintain a positive and courteous customer service orientation
- Demonstrate the highest levels of ethical and professional conduct at all times and under all circumstances.
- Speak professionally and respectfully to those you serve.
- Respond to requests for information or assistance in a timely and supportive manner.
- Discuss available treatment options openly with patients, and involve them in decisions regarding their care.
- Provide care to all patients regardless of their ability to pay or source of payment.
- Deliver services in accordance with all professional standards that apply to your position.
- Create and maintain complete, timely and accurate medical records.
- Protect the privacy and confidentiality of all personal health information — electronic, paper or verbal — you may receive.
- Clearly explain the outcome of any treatment or procedure to patients, or their designees, especially when outcomes differ significantly from expected results.
- • Respect patient advance directives.
- • Address ethical conflicts that may arise in patient, including end-of-life issues, in collaboration with clinical and ethical leadership.

*Quality of Care and Patient Safety*

SoNE HEALTH is committed to providing high-quality care that is safe, effective, efficient, and compassionate. Safety is our first priority. We do everything we can to make sure the care we provide is safe. And we design the systems we use with safety first in mind.

SoNE HEALTH is committed to a Just Culture. A Just Culture recognizes that individuals should not be held accountable for system failings over which they have no control. A Just Culture emphasizes learning from our mistakes so they are not repeated. A Just Culture encourages all who work in SoNE Health to report safety issues, incidents and “near misses” so they can be addressed timely through changes to systems and processes without fear or blame.

*Medically Necessary and Appropriate Care*

We treat all patients and others in our care with respect and dignity, providing care that is both necessary and appropriate. Medical care decisions are made with the best interests of our patients and others we serve in mind. We assist patients and others in making high-quality, informed decisions regarding their care, and we respect and honor their personal care decisions.

*Protecting Personal Health Information (PHI)*

As a business associate of direct care providers, we collect personal health information (PHI) from patients, members and others, including current and past medical conditions, medications, and family histories, in order to provide effective, high-quality care. We recognize the sensitive nature of this information and are committed to maintaining its confidentiality. PHI is collected in many ways — in paper and electronic records, films and digital images, and even in verbal discussions. All PHI, in whatever form, should be protected and treated confidentially and in accordance with federal and state laws.

- Do not access, review or use PHI unless necessary to perform your job.
- Do not leave PHI (electronic or paper) unattended or available to others.
- Do not discuss PHI in public areas e.g., cafeterias, restrooms, or elevators.
- Do not store PHI on laptops or tablets not authorized and approved for use in SoNE HEALTH.
- Do not release PHI to others or remove PHI from your facility without authorization from your immediate supervisor.
- Do not discuss or post PHI on any social media sites such as Facebook or Twitter whether using at work or at home.
- Immediately notify your supervisor, the Vice President of Information Technology, or the Integrity & Compliance Office, if you believe PHI has been lost, stolen or accessed inappropriately.

SoNE HEALTH has implemented specific policies and procedures to protect the privacy and security of PHI. Consult our policies and procedures for more information.

*Gifts From or To Patients*

You may not solicit or accept gifts, money, favors, etc., from patients or their family members. Occasional perishable or consumable gifts given to a department by a patient or patient's family may be accepted. If patients, family members or other loved ones wish to present a gift of money, refer them to our foundation. The solicitation of gifts is limited to colleagues that work in our foundations or specific fundraising departments. There are also laws that prohibit health care providers from giving free or discounted items or services to patients covered by federal and state health care programs unless specific requirements are met. Any gifts or other items of value provided Medicare or Medicaid beneficiaries may not exceed $15 per item or more than $75 per year per recipient. Please discuss with your supervisor or consult our policies before extending any gifts to a Medicare or Medicaid patient. In some cases, it is permissible to offer patients in-kind items and services that are preventive care in nature or advance a clinical goal

of a participating patient such as adherence to a treatment regime, drug regime, follow-up care plan or the management of a chronic disease or condition. Any program providing in-kind items or services to patients must be approved by SoNE HEALTH senior management in consultation with SoNE HEALTH's Chief Compliance & Privacy Officer and Legal Counsel.

*Emergency Medical Treatment and Active Labor Act (EMTALA)*

While SoNE HEALH does not provide emergency services, we are expected to be aware of the regulatory environment in which our network operates, including those hospital facilities that are members of our network. Hospitals with a dedicated emergency department follow the Emergency Medical Treatment and Active Labor Act requirements to provide a medical screening examination and necessary stabilization to any individual who comes to the emergency department before asking any questions about their ability to pay for services. Provided the hospital has the capacity and capability, anyone with an emergency medical condition is treated. In an emergency situation or if the patient is in labor, the hospital is expected to do not delay the medical screening and necessary stabilizing treatment in order to seek financial and demographic information. Hospitals are expected to not admit, discharge, or transfer patients with emergency medical conditions simply based on their ability or inability to pay or any other discriminatory factor.

*Ethical and Religious Directives for Catholic Health Care Services*

While SoNE HEALTH is not a Catholic health care organization, certain network participants are part of one or more Catholic health care organizations. To provide services to our network, we are expected to be aware of the Ethical and Religious Directives for Catholic Health Care Services. Also called the ERDs, these directives provide official church guidance and teachings on issues that are central to organizations that serve as a Catholic health care ministry. Those working with these organizations are required to abide by the ERDs. Consult with your executive leader if you have questions regarding how the ERDs may apply to your work.

## Questions & Answers

**Q.** If I see that a patient is not being treated with proper respect and courtesy by a colleague, what should I do?

**A.** First, act immediately if the patient is at risk of harm. Then discuss the situation with your supervisor. If your supervisor does not provide a satisfactory response, contact a higher-level manager in your department or one of the resources listed on page 29 for assistance. Remember that appropriate role modeling of respectful behavior is expected of all colleagues each and every day.

**Q.** I recently had a patient tell me that he doesn't want to receive any more aggressive treatment and wants to be made comfortable and be allowed to die. He doesn't think I or any of his caregivers are listening to him. What should I do?

**A.** People-centered care is listening to what the patient wants – even if the individual's decision conflicts with your own values. You should make the patient clinical team aware of his wishes and work with the clinical team and the individual's family on

appropriate ways to honor his wishes, for example, palliative care services. It is important that the patient be presented with appropriate options so that any decision made is an informed decision. Please contact SoNE HEALTH's clinical leadership if you have any questions or concerns.

**Q.** Because of my job duties at SoNE HEALTH, I have access to the electronic medical records systems for our network's hospitals. Recently a friend of mine was seen in the emergency room and later admitted to one of our hospitals. I'm concerned and would like to check the medical record to see how she's doing or at least locate which room she's in so I can visit her. Is that okay?

**A.** No. Since you are not involved in your friend's care, you do not have any business need to access her medical information or location. You may only access this type of information if needed to do your job. Note that SoNE HEALTH has monitoring systems in place to determine whether colleagues have used their system access privileges appropriately. Discipline for inappropriate use of such privileges can include termination.

**Q.** My health care provider is part of our network. They use a patient portal where I can look up information in my medical records, such as lab results. Because of my job duties at SoNE HEALTH, I also have direct access to my health care provider's the electronic medical records system. Why can't I access my own health information directly through the electronic health record where I work?

**A.** All patients are encouraged to use the patient portal to review their medical information and to effectively partner with clinicians involved in their care. Colleagues given access to electronic medical record systems as part of their duties at SoNE HEALTH are restricted to only accessing information needed to do their job. Accessing your own medical records in SoNE HEALTH information systems or the information systems of those in our network is a violation of our policies and procedures. Colleagues may only access medical records systems to support their job-related duties. Appropriate access and use of medical records systems is monitored by SoNE HEALTH and may also be monitored by those in our network.

**Q.** I am care manager and one of the patients in my queue has asked that his same-sex life partner be included in discussions about transitions of care. This meeting is typically attended by only family members. How should I respond?

**A.** Since the patient has asked that his partner be recognized as a member of his family for care planning purposes, you should invite the patient's partner to attend the meeting. Patients, their family members and loved ones have a fundamental right to compassionate care that respects their dignity, diversity and specific wishes.

**Relationships with Coworkers and Others That Serve With Us**

The delivery of high-quality, safe and effective care requires effective teamwork among all individuals involved. Studies have consistently shown a positive relationship between the work place environment and the quality and safety of care delivered. Trust and respect are important factors in supporting effective teamwork in the workplace. All who work in SoNE HEALTH are expected to:

• Treat others with honesty, dignity and respect.
• Maintain a positive and courteous customer service orientation.
• Speak professionally and respectfully to colleagues and others that serve with you.
• Behave in a manner that enhances a spirit of cooperation, mutual respect and trust among all members of the team.
• Commit to working with others in a supportive team environment.
• Respond to requests for information or assistance in a timely manner.
• Communicate with others in a clear, open, honest and respectful manner.
• Provide and accept appropriate feedback.
• If possible, attempt to address any differences you may have with colleagues directly with the individuals involved.
• Respect the diversity of others and do not discriminate in any employment action based on race, religion, color, gender, age, national origin, marital status, sexual orientation, genetic information, disability or any other characteristic protected by law.
• Abstain from inappropriate physical contact with colleagues and others and report any harassment, intimidation or violence of any kind that you witness in the workplace.
• Promptly report any serious workplace injury or any situation you identify that could present a potential health and safety hazard.
• Protect the confidentiality of colleague personal and health information including wage and salary information, benefits, social security numbers, personnel actions, medical information, and banking and financial information.
• Maintain a safe work environment by performing your duties and responsibilities free from the influence of drugs or alcohol.
• Protect the confidentiality of all medical peer review information.

*Harassment and Workplace Violence*

Each SoNE HEALTH colleague has the right to work in an environment free of harassment and disruptive behavior, including behaviors that undermine a culture of safety. Harassment includes degrading or humiliating jokes, slurs, intimidation or any conduct that creates a hostile work environment. Sexual harassment is also prohibited, including unwanted sexual advances, and verbal or physical contact of a sexual nature that creates an intimidating, hostile, or offensive work environment.

Workplace violence is any act or threat of physical violence, menacing, intimidation, or other threatening disruptive behavior that occurs on or off the worksite that impacts work-related activities. It may be intentional or unintentional. It may affect and involve colleagues, patients, network participants, contractors and suppliers. Colleagues who observe or experience any form of harassment or workplace violence should report the incident to their

supervisor, the Human Resources department, the Confidential Compliance Hotline, or the resources listed on page 29.

*Workplace Safety*

SoNE HEALTH is committed to promoting a safe workplace environment for all colleagues and others in our organization. SoNE HEALTH has developed policies and procedures to protect colleagues and others from potential workplace hazards and to comply with applicable government rules and regulations that promote workplace health and safety. You should be familiar with and understand how these policies apply to your specific job responsibilities and seek advice if you have a question or concern. You should immediately notify your supervisor or Human Resources of any serious workplace injury or any situation presenting risk of injury so that timely actions may be taken to resolve the issue.

*Diversity, Equity and Inclusion*

SoNE HEALTH is committed to promoting diversity in its workforce and to providing an inclusive work environment where everyone is treated with fairness, dignity and respect. We are committed to recruit and retain a diverse staff reflective of the communities we serve. SoNE HEALTH is an equal opportunity employer and prohibits discrimination against any individual with regard to race, color, religion, gender, marital status, national origin, age, disability, sexual orientation, or any other characteristic protected by law.

*Controlled Substances*

While SoNE HEALTH employees may not provide direct clinical or pharmaceutical care, be aware that many participants in our network have routine access to prescription drugs, controlled substances and other medical supplies as part of their work responsibilities. Many of these substances are governed by laws and regulations that strictly limit their use to minimize potential risks to both patients and health care workers. Unauthorized access, use or diversion (e.g. theft) of controlled substances is prohibited. Immediately report to your supervisor or a higher-level manager any potential issues or concerns you identify involving the security or diversion of controlled substances.

## Questions & Answers

**Q.** I overheard a colleague making jokes about people of certain ethnic backgrounds with other coworkers. It made me feel really uncomfortable. What should I do?

**A.** It is not appropriate to make jokes or fun at the expense of others based on ethnic, racial, religious, age, gender, sexual orientation, marital status, disability or other any other characteristic. Even if unintended, this behavior can contribute to an environment of intolerance and, if allowed to continue, can be considered harassment. You should discuss this matter with your supervisor or contact the Human Resources department.

**Q.** My supervisor told me that I have to start work an hour earlier on scheduled work days because we need coverage in the department. Can she do that? I've worked the same schedule of hours for five years.

**A.** Yes. Your supervisor has the right to change your work schedule to meet the operating needs of the department. If you are unable to comply with your new work schedule, discuss the matter with your supervisor.

**Q.** A male colleague has been very "friendly" with several female coworkers in my department. There's a lot of hugging and touching, even when other people are in the room. I don't think this is appropriate, even though the female coworkers involved don't seem to mind. What should I do?

**A.** You should discuss the situation with your supervisor. You should also feel free to share your feeling of discomfort directly with the male colleague. He may not be aware that his behavior makes you or others feel uncomfortable. If you remain concerned, contact a higher-level manager or leader in SoNE HEALTH, your Human Resources department or the Integrity & Compliance Line. Note that the situation and recommended actions would be no different if a female colleague initiates the touching with male colleagues or if both parties are of the same gender.

**Q.** One of my coworkers returned from a break and appears to be under the influence of alcohol or drugs. How should I respond?

**A.** First, act immediately if patients are at risk of harm from the actions of the colleague. Then notify your supervisor, a higher-level manager or your Human Resources department immediately and discuss the situation. There may be a medical condition causing your colleague's behavior rather than alcohol or drugs, but your supervisor or a higher-level manager will be needed to evaluate the situation.

**Q.** Yesterday I saw a medical director yell and scream at a colleague in the presence of other colleagues. I was very bothered by the physician's behavior and felt terrible for the colleague. Is there anything I can do?

**A.** SoNE HEALTH is committed to promoting a respectful work environment. Behavior that is rude, embarrassing, threatening, belittling or intimidating, including the use of profane or abusive language, is not appropriate. You should discuss the matter with your supervisor, a higher-level manager, or contact your Human Resources department or the Integrity & Compliance Line.

**Q.** I have a real problem with one of my colleagues. She and I share assignments in my department, but I feel like I carry most of the workload and she just slacks off. I really don't want to work with her anymore. What should I do?

**A.** Whenever you have a conflict with a colleague, it is best to first discuss it privately with the person. Explain what you have observed and how it affects the work of your department. If you don't see a change in behavior, discuss the issue with your

supervisor. You should also discuss the issue with your supervisor if you believe the colleague's behavior may violate our Code of Conduct - for example intentionally violating our organization's timekeeping and payroll policies.

**Q.** I work in the Human Resources department. Lately I've been finding confidential employee information, including payroll data and other personal information, left behind in the copy room that's used by other departments on our floor. What should I do?

**A.** Protecting the privacy and security of employee information is very important. Take the documents you've found to your supervisor or a higher-level manager in your department so they can determine the most appropriate way to follow-up with staff on this issue.

**Relationships with Suppliers and Other Business Partners**

Employees and others working on behalf of SoNE HEALTH are expected to maintain appropriate business relationships with suppliers, independent contractors, consultants, and others providing goods or services to our organization. Such relationships must be free from conflicts of interest and consistent with applicable laws and good business practices. The cost of gifts, entertainment, and meals provided by suppliers and other business partners is ultimately borne in the cost of products and services purchased by SoNE HEALTH. The following guidelines for interactions with suppliers and other business partners apply to all who work in SoNE HEALTH (please note the department where you work may follow more restrictive policies which you are expected to follow):

- Do not accept gifts, entertainment, meals, or other incentives given for the purpose of influencing a purchasing or contracting decision, or that otherwise could appear to improperly influence decisions you make involving SoNE HEALTH.
- Do not accept gifts, entertainment, meals, or other incentives given for the purpose of encouraging or rewarding patient referrals.
- Do not offer, accept, or solicit gifts, meals, entertainment or other incentives that could be perceived as a bribe, payoff, deal or any other attempt to gain a competitive advantage.
- Do not accept cash or items redeemable for cash such as checks, gift cards, etc.
- Occasional non-cash items of nominal value (e.g. pens, note pads, coffee mugs) may be accepted, but are generally discouraged.
- You should politely decline gifts offered by suppliers or other business partners that involve entertainment or social activities such as free or discounted tickets to sporting events, theatre or concert events, golf outings, travel and lodging, etc. You may attend an entertainment or social event with a supplier or other business partner provided you, not the supplier, pay your own cost (e.g., the face value of a sporting event ticket) to attend such events. Any exceptions to this policy require the advance approval of your supervisor and the Integrity & Compliance Office.
- Suppliers and other business partners may occasionally donate to charitable fundraising events that benefit our foundation. These events may include social or entertainment

activities (e.g., golf or dinner) where SoNE HEALTH colleagues are invited to participate with a supplier or business partner. You may accept such invitations provided you obtain the advance approval of your supervisor. SoNE HEALTH colleagues are encouraged to make a personal donation to the fundraiser equal to the value of the event to an individual participant, although doing so is not required.

- You may accept invitations to attend local or out-of-town programs, workshops, seminars and conferences sponsored by a supplier or other business partner that have a legitimate educational purpose or otherwise support a SoNE HEALTH business objective (e.g., product training) provided such events are infrequent (e.g., no more than once annually), you obtain the approval of your supervisor in advance, and SoNE HEALTH, not the supplier, pays for any related travel and overnight lodging costs you incur. Any exceptions to this policy require the advance approval of your supervisor and the Integrity & Compliance Office.
- In all cases you should use common sense and good judgment in accepting or refusing gifts of any kind. Consider all the facts and circumstances and discuss any questions you have with your supervisor or the Integrity & Compliance Office. There may be circumstances when accepting a gift that technically meets the guidelines specified above should be declined.
- Occasional (e.g., no more than 1-2 times annually) perishable or consumable items (e.g., flowers, fruit, candies, etc.) of nominal value given to a department and shared with co-workers may be accepted, but are generally discouraged.
- In general, SoNE HEALTH discourages colleagues from accepting meals and refreshments paid by suppliers or other business partners. An occasional meal or refreshments may be accepted provided the following requirements are met:
    - Such events are infrequent, which, as a general rule, means no more than 1-2 times per year.
    - The event immediately precedes or follows a legitimate business meeting (e.g. discussion of business topics involving SoNE HEALTH).
    - The setting for the meal is appropriate to discussing business (e.g. office or restaurant) and the host is present.
    - The supplier or business partner's expense is modest which, as a general rule, means the cost of meals and refreshments does not exceed $50.
    - SoNE HEALTH does not incur additional travel or overnight lodging costs as a result of your participation in the meal.

  The above requirements do not apply to meals and refreshments provided in connection with a conference or other educational program sponsored by a supplier, consultant or business partner for the benefit of all attendees.

*Fundraising*

SoNE HEALTH's foundation may solicit charitable contributions to support its organizational purposes. SoNE HEALTH restricts the solicitation of gifts from suppliers and other business partners to only those colleagues working on the foundation matter or specific fundraising departments. Fundraising requests are not to be made of suppliers and other business partners in exchange for promises of SoNE HEALTH business or to influence current or future business decisions.

*Conflicts of Interest*

You are expected to avoid situations or circumstance that could place you in conflict with the interests
of SoNE HEALTH. A conflict of interest may exist whenever your outside activities, personal financial
interests or relationships interfere, or could appear to interfere, with your judgment or decision-making
in your position or role with SoNE HEALTH. In addition to gifts, entertainment and meals, there are a few other areas which you should be aware of that can create potential conflicts of interest:

- **Outside Employment**: You should discuss with and obtain the approval of your supervisor and the Integrity & Compliance Office before accepting an offer to work for any organization that conducts business with or competes with SoNE HEALTH.
- **Endorsements and Testimonials**: Do not make any endorsements or testimonials for suppliers, vendors, trade or professional organizations conducting business with SoNE HEALTH without discussing and obtaining the advance approval of your supervisor and the Marketing & Communications department.
- **Financial Interests**: It is generally considered to be a conflict of interest to do business with, or recommend that SoNE HEALTH do business with, a company in which you or a family member has a financial interest. Financial interests may include employment or other compensation arrangements, as well as ownership or investment interests (investments in large, publicly-held companies are generally not a concern). Discuss with your supervisor any financial interests you or a family member may have that might present a conflict of interest with your job responsibilities in SoNE HEALTH.
- **Service on Outside Boards**: SoNE HEALTH colleagues are encouraged to actively participate in charitable and civic organizations that benefit our communities. Discuss with and obtain the approval of your supervisor before accepting an invitation to join a board of any organization that may create a conflict of interest with your job responsibilities at SoNE HEALTH.

When addressing conflicts of interest, remember that appearances do count! Discuss any questions you have regarding potential conflicts of interest with your immediate supervisor or contact the Integrity & Compliance Office.

## Questions & Answers

**Q.** Suppliers frequently visit our office and bring in new products for us to sample. They always want to provide lunches for the office staff. Is it appropriate to accept free lunches from suppliers?

**A.** In general, SoNE HEALTH discourages the acceptance of meals and refreshments paid or provided by suppliers or other business partners. Any meal provided must be infrequent, connected to a legitimate business purpose, such as education or product

demonstration, and must take place in an appropriate business setting with the supplier host present. Take- out food ("dine and dash") delivered to office staff by a supplier or meals that are not connected with a legitimate educational or business purpose are prohibited. Likewise, meals may only be provided for staff attending the education or product demonstration and the cost of any meals provided must be modest. Consult your department's policies on acceptance of supplier provided meals which may be more restrictive.

**Q.** The firm SoNE HEALTH uses for marketing and advertising services offered me two courtside tickets to a professional basketball game. Can I accept the tickets?

**A.** You should politely decline the acceptance of gifts that involve social or entertainment activities such as free or discounted tickets to sporting events. You may accept the tickets only if you personally pay the supplier the cost of the tickets.

**Q.** A supplier recently called seeking my input on a new product that is under development. The supplier will be holding an out-of-town meeting and has asked me to attend. The supplier is willing to pay my airfare, hotel and meals for two days, as well as pay for my time to attend the meeting. Can I accept the invitation?

**A.** SoNE HEALTH prohibits the acceptance of supplier-paid compensation and expenses for travel, lodging and meals. If you are in a position of decision-making regarding the purchase or use of the supplier's products in SoNE HEALTH, or in a position to recommend such products to our network, your participation in the meeting and acceptance of compensation and expenses paid by the supplier could be viewed as potentially influencing your future decision-making. You and your supervisor should discuss the purpose of the meeting and the potential expectation of the supplier as a result of your participation. Any exceptions require the advance approval of your supervisor and the Integrity & Compliance Office.

**Q.** Suppliers frequently send gifts of fruit or candies to our department during the holidays. Can we accept such gifts or must they be returned?

**A.** Although discouraged, you may accept occasional gifts (e.g. no more than 1-2 times annually) of perishable or consumable gifts from suppliers that are broadly shared among a department or with co-workers.

**Q.** I work full-time, and would like to get some extra hours of work at another organization in the community. Do I have to discuss with my supervisor before I accept another position?

**A.** Before you consider an offer to work, including for a potential competitor of our network, discuss the situation with your supervisor to make sure there are no potential issues in accepting outside employment that might interfere with your work responsibilities at SoNE HEALTH. This issue is especially important for full-time colleagues.

**Q.** I was asked by a professional organization I am a member of to speak at an upcoming educational event. The professional organization has offered to pay my travel expenses and lodging for the day I am scheduled to speak. May I accept the offer?

**A.** Yes, SoNE HEALTH colleagues may accept travel expenses and lodging in exchange for professional speaking engagements. However, the expenses should be reimbursed only for the day you are asked to speak. For example, if it's a five-day educational conference and you will only be speaking on the first day, the reimbursed expenses should be for one night's lodging and related travel expenses.

**Q.** My sister-in-law is a health care industry consultant. Is it okay if I recommend her to work on a consulting project at SoNE HEALTH?

**A.** Yes, however you should fully disclose your relationship to anyone in SoNE HEALTH that you recommend your sister-in-law, or her firm, for the project. You should not participate in the hiring decision, nor use your position to influence the outcome of the hiring decision. Also, you must not share any information with your sister-in-law that is confidential or that has not been provided to other prospective suppliers.

**Q.** I am the point of contact at SoNE HEALTH for a particular supplier. SoNE HEALTH's foundation is conducting a major fundraising campaign and the supplier recently asked me what amount they should donate because they want to make sure they don't risk losing their SoNE HEALTH contract. What should I say?

**A.** You should refer the supplier to the foundation to discuss appropriate options for contributing to the campaign. You should also advise the supplier that the supplier's decision to donate (and how much to donate) to the capital campaign is not a factor in current or future contracting decisions.

**Relationships with Regulators and Those Who Pay for Our Services**

Federal and state health care programs, such as Medicare and Medicaid, as well as commercial insurance and other third-parties, are responsible for the payment of a significant majority of the health care services our network provides to our communities. SoNE HEALTH, the members of our network and other health care organizations are subject to numerous laws and regulations that apply to our operations. These laws and regulations are complex and can be challenging to apply in a rapidly changing health care industry. Nevertheless, SoNE HEALTH is committed to complying with all laws and regulations that apply to our organization. All who work in SoNE HEALTH are expected to:

- Act with honesty and integrity in all activities involving SoNE HEALTH.
- Follow all laws, regulations and SoNE HEALTH policies that apply to your work and ask for assistance if you have questions about how they affect you. See resources available to assist you on page 29.

- Follow all requirements of Medicare, Medicaid, other federal and state health care programs, as well as those of commercial insurance companies and other third-party payers. These requirements generally involve:
    - Delivering high-quality, medically necessary and appropriate services.
    - Creating and maintaining complete and accurate medical records.
    - Submitting complete and accurate claims for services provided.
    - Protecting the privacy and security of health information we collect.
- If involved in an accreditation survey at one of our network participants, responding to surveys conducted by accrediting or external agency surveying organizations and/or payers with honesty, openness and accurate information. Do not take actions intended to obstruct or mislead an accrediting or external agency survey team.
- Submit accurate and complete cost, quality, safety, tax and other information in all reports filed with federal and state regulatory agencies.
- Do not engage in discussions or make agreements with competitors related to pricing, market strategies, payer strategies, or wages and benefits. Consult with SoNE HEALTH legal counsel on any matters that could implicate antitrust laws.
- Do not contract with, employ, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal or state health care programs. Report to SoNE HEALTH if you become excluded, debarred, or ineligible to participate in federal or state health care programs.
- Present only truthful, fully informative, and non-deceptive information in any marketing or advertising activities.
- While SoNE HEALTH may not conduct medical research directly, if you are involved in medical research within our network, conduct all medical research activities consistent with the highest standards of ethics and integrity and in accordance with all federal and state laws and regulations, Institutional Review Board and SoNE HEALTH/network policies.
- Participate in training and education programs offered by SoNE HEALTH to assist you in understanding laws, regulations and SoNE HEALTH policies that apply to your work.
- Cooperate with and immediately notify your supervisor of any government investigation. Never, under any circumstances, destroy or alter documents or information, including electronic documents, records, or correspondence requested as part of a government investigation. Never lie or make false statements to a government investigator.
- Do not offer gifts or other items of value to a government representative.
- Do not contribute – or direct the contribution of – SoNE HEALTH funds to any political candidate, political party, or political campaign.

*Do I Have a Relationship with the Government?*

While many federal and state laws and regulations that apply to SoNE HEALTH may not affect the work you do directly, it's important for you to be aware of certain laws and regulations and how they affect our organization and network.

*Fraud and Abuse*

There are many federal and state laws designed to protect government health care programs, such as Medicare and Medicaid, as well as commercial insurance and other third-parties that pay for the health care services our network delivers. These Fraud and Abuse 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 or services not covered by the payer.
- Making false statements or representations to obtain payment for services or to gain participation in a health care program.
- Concealing or improperly avoiding an obligation to repay a health care program.
- Offering or paying money, goods, or anything of value to encourage or reward the referral of patients to a health care provider.

*Managed Care Considerations*

SoNE HEALTH, as a managed care contracting organization for its network, negotiates and enters into managed care contracts, including risk-based contracts, with health plans for the delivery of health care services by its participating providers, and provides administrative services to manage those contracts. SoNE HEALTH is committed to carrying out its managed care contracting initiatives in compliance with all applicable Federal and State laws and regulations.

Fraud & Abuse Considerations in the Managed Care Context

A variety of managed care arrangements may implicate Federal and State statutes relating to health care fraud and abuse. These arrangements may include, without limitation, discounted fee for service rates (for example, discounts extended by tertiary care providers), withhold returns, managed care bonuses, and surplus distributions to participating providers. To ensure compliance with applicable laws, the President and CEO will consult with the Chief Compliance Officer, and, if necessary, legal counsel in the review and approval of any such managed care arrangement as described above, or similar arrangement in the managed care context, involving any provider or entity in a position to refer to any affiliate of SoNE HEALTH that may contain referral and payment provisions that could violate statutory or regulatory requirements.

The Office of Inspector General (“OIG”) has, under statutory authority, promulgated numerous regulatory “safe harbors” to clarify the reach of the Federal Anti-Kickback Statute (“AKS”). The safe harbors generally exempt certain payment and business practices from prosecution under the AKS that would otherwise be implicated by the broad scope of the AKS prohibitions. An arrangement must meet all of the requirements of a safe harbor to be protected by it. The failure of an arrangement to fit within a safe harbor does not mean that the arrangement violates the AKS or is suspect due to that fact alone. Rather, the fact that an arrangement does not meet a safe harbor means that the arrangement is not deemed to be a protected arrangement under the AKS, and must be evaluated on a case-by-case basis.

There are certain safe harbors that are specifically designed to be applicable to certain arrangements in the managed care environment that may apply to certain of the activities of SoNE HEALTH. These safe harbors, which by their nature often overlap to a certain extent, are intended to protect what the OIG believes are innocuous, and even beneficial, managed care arrangements involving price reductions to managed care plans (and in some cases to the plan's "first tier contractors" such as SoNE HEALTH and "downstream contractors" such as members of SoNE HEALTH's network) that would otherwise constitute remuneration within the meaning of AKS and implicate the statute. The OIG has explicitly recognized that many managed care arrangements exist in the marketplace that do not fall within a safe harbor, but do not violate the AKS, and must be analyzed on a case-by-case basis. The President and CEO will consult with the Chief Compliance Officer and, if necessary, legal counsel to assist with this analysis. Any SFHCP Party who suspects that a particular activity, communication, agreement or situation may violate this provision or applicable State or Federal laws, should report those concerns to his or her supervisor, the Chief Compliance Officer or the President and CEO, or call the Compliance Hotline.

Antitrust Considerations in the Managed Care Context

As a managed care contracting entity negotiating and entering into contracts on behalf of its provider network, SoNE HEALTH's activities may implicate Federal and State antitrust laws, specifically with respect to activities and negotiations on behalf of its participating providers. No officer, director, employee, staff member or agent of SoNE HEALTH has authority to enter into any activity, agreement or contract that may violate antitrust laws, including having a substantial anticompetitive effect not outweighed by procompetitive efficiencies, controlling prices, allocating markets or excluding competitors. This includes not only formal written agreements but also so-called "gentlemen's agreements" or understandings. Examples of potentially anticompetitive arrangements include, but are not limited to, those that allocate patients, markets or territories, joint boycotts or refusals to deal with third party payors, and contracts that do not require clinical or financial integration. Any agreement with any other organization that provides the same services as SoNE HEALTH must be reviewed by the Chief Compliance Officer and, if necessary, legal counsel. Any agreement with any health plan or insurer that involves non-risk contracting or that may not involve sufficient integration for joint contracting must be reviewed by the Chief Compliance Officer and, if necessary, legal counsel. Any SoNE HEALTH colleague who suspects that a particular activity, communication, agreement or situation may violate this section or State or Federal antitrust laws, should report those concerns to his or her supervisor, the Chief Compliance Officer, or the President and CEO, or call the Compliance Hotline. If any member of the SoNE HEALTH community has any issue, question or concern relating to SoNE HEALTH's managed care contracting functions or arrangements that is not addressed in this Policy, the individual is encouraged to communicate it to the Chief Compliance Officer or the President and CEO, or call the Compliance Hotline.

*Relationships with Physicians and Other Referral Sources*

If your work responsibilities include interactions with physicians or other persons or organizations that may refer patients to our network, it is important that you are aware of the requirements of laws and regulations that apply to these relationships. These include the federal

Anti-Kickback Law, Stark Law, laws that apply to tax-exempt organizations, and similar state laws. SoNE HEALTH has established specific policies and procedures addressing financial relationships with physicians and other referral sources. These policies are based on two key principles that apply to all such relationships:

- **We do not pay for referrals**: Patient referrals and admissions are based solely on an individual's medical needs and our network's ability to render the needed services. No one in SoNE HEALTH is allowed to pay or offer payment to anyone for the referral of patients.
- **We do not accept payments for referrals**: No one in SoNE HEALTH is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients to a network facility. We do not take into account the value or volume of referrals made to us when making referrals to other health care providers.

Failure to properly structure and administer financial relationships with physicians and other referral sources can result in unintended violations of the law and significant legal and financial consequences to SoNE HEALTH, our network, and potentially to the individuals involved. Please contact SoNE HEALTH legal counsel or the Integrity & Compliance Office if you have questions as to how these laws and regulations apply to your work responsibilities or to obtain additional information on SoNE HEALTH policies and procedures.

*Tax-Exemption*

Many SoNE HEALTH facility network members are not-for-profit, tax-exempt organizations operated exclusively for religious or charitable purposes. Care of those who are poor, benefits provided to our communities, and medical education programs are examples of the types of activities that support these charitable purposes. As a tax-exempt organization, these organizations are required to follow a number of additional laws and regulations that generally prohibit the following:

- The improper use of their assets for the private benefit or interests of any individual in a position of substantial influence over the organization.
- Paying more than "fair market value" for goods and services, or providing goods and services to others at less than fair market value unless allowed by law.
- Direct or indirect campaigning for or against the election of any candidate for public office, including the donation of organizational funds to any political candidate, party organization or committee.
- Engagement in substantial lobbying activities. These organizations may comment on legislation or regulations under consideration and may also take public positions on issues relating to their operations and mission.

*The False Claims Act*

The False Claims Act is a federal law that makes it a crime for any person or organization to knowingly make a false record or file a false claim to a federal health care program. "Knowingly" includes having actual knowledge that a claim or record is false or acting with "reckless disregard" as to whether a claim is false. In addition to the federal law, many states

have adopted similar state false claims laws. The False Claims Act and similar state laws allow individuals with original information concerning fraudulent activities involving government programs to file a lawsuit on behalf of the government and, if successful, to receive a portion of the recoveries received by the government. Penalties for violating the False Claims Act are significant. Financial penalties can be as much as three times the amount of the claims plus fines of $11,181 - $23,331 per claim. Courts can also impose criminal penalties against individuals and organizations for willful violations of the False Claims Act. The False Claims Act and similar state laws protect employees, contractors and agents from being fired, demoted, threatened or harassed by an employer for filing a False Claims Act lawsuit. SoNE HEALTH prohibits colleagues, agents or contractors from knowingly presenting or causing to be presented claims for payment which are false, fictitious or fraudulent. Please contact the Integrity & Compliance Office if you have any questions regarding the False Claims Act.

## Questions & Answers

**Q.** While preparing quality data for submission to Medicare, I believe some of the data is not accurate or appropriate based on accountable care organization (ACO) data submission rules. Should I submit the data anyway and let Medicare determine if the information is appropriate?

**A.** It is inappropriate to submit information to Medicare, or any other payers, that are known to be inaccurate or that do not meet the payer's requirements.

**Q.** In my work area we refer many patients to local home care agencies for at-home services. One of the local home care agencies recently offered to give us gift certificates in appreciation for referring patients to their agency. Is this allowed?

**A.** No. Federal laws strictly prohibit health care providers and their employees from offering or accepting anything of value in exchange for the referral of Medicare and Medicaid patients. You should discuss this matter with a senior-level manager or the Chief Compliance & Privacy Officer so that appropriate follow-up action can be taken with the home care agency.

**Q.** While preparing claims for submission to Medicare, I believe there are charges for some services that are inappropriate based on Medicare's billing rules. Should I submit the claims anyway and let Medicare determine if the charges are appropriate?

**A.** It is inappropriate to submit claims to Medicare, or any other payers, that are known to be inaccurate or that do not meet the payer's requirements. If you believe the charges are inappropriate, you should notify your supervisor of your concerns. If the issue is occurring on a regular basis, you and your supervisor should discuss the issue with appropriate management responsible for the department or area involved so that actions may be taken to prevent the errors from occurring in the future.

**Q.** We recently notified by Medicare of some billing errors. The claims at issue have been corrected. However, we haven't changed our practices that caused the errors to occur in the first place. Do I have a responsibility to tell someone?

**A.** Yes. All of us have a responsibility to seek answers to our questions and concerns. Speak with your supervisor to make sure you fully understand the situation. If you are still concerned that appropriate actions have not been taken to resolve the billing issues, contact the Integrity & Compliance Office or the Integrity & Compliance Line.

**Q.** A government investigator tried to reach me at my home. She left a note asking me to call her to discuss our data submission practices. What should I do?

**A.** It is the policy of SoNE HEALTH to cooperate and respond appropriately to any lawful government investigation. It is appropriate for you to ask the government investigator for official identification such as a badge or picture ID. You have the right to decide whether or not to meet with the investigator and may inform the investigator that you only wish to respond to questions at work in the presence of your supervisor or an attorney representing SoNE HEALTH. In all situations you have the right to consult with legal counsel before making a decision. If you choose to meet with the investigator, you must always be truthful. Never lie or attempt to deceive a state or federal government official. Do not destroy any documents that you think the investigator may be seeking or that you believe could be relevant to the investigation. Regardless of your decision, if contacted you are strongly encouraged to immediately notify your supervisor, the Integrity & Compliance Office, or SoNE HEALTH's legal counsel.

**Q.** My job responsibilities require me to frequently interact with physicians on the medical staff within our network. I understand there are specific laws and regulations that impact what I can and can't do with physicians. What are the rules and where can I find more information?

**A.** You are correct that there are several federal and state laws and regulations that impact relationships with physicians and other referral sources. These include the Anti-Kickback Law, the Stark Law, and laws applicable to tax-exempt organizations. In general, it is inappropriate to offer or give gifts, gratuities or anything of economic value to a physician in exchange for referring patients. All financial arrangements with physicians, such as employment, administrative and professional service agreements, office and equipment leases, and asset purchases and sales, must be properly structured and carefully administered to ensure compliance with these laws and regulations. You should contact the Chief Compliance & Privacy Officer or SoNE HEALTH's legal counsel to learn more about our policies and to discuss any questions you have.

**Q.** A colleague recently posted a notice on our department's electronic bulletin board asking other colleagues to join him in forming a group to support a candidate for the city council. Is this appropriate?

**A.** No. Using SoNE HEALTH's resources, such as bulletin boards, emails, and telephone systems, to participate or encourage others to participate in political activities on behalf of specific candidates for office or specific political parties is not allowed without review and approval by executive leadership. You should discuss this matter with your supervisor or contact the Chief Compliance & Privacy Officer.

**Q.** A friend of mine works in the Human Resources department at another hospital in our community. He wants to do a survey of area health care salaries. May I share our network's salary information with him?

**A.** No. There are strict laws that regulate competition, such as antitrust laws. Sharing salary information may appear to be an effort to fix wages and limit competition in the marketplace. You should notify the Chief Compliance & Privacy Officer or SoNE HEALTH's legal counsel so that appropriate follow-up can take place.

**Relationships with Our Network and Communities We Serve**

Each of us also has a relationship with our network and to the broader communities we serve. As with other relationships described herein, there are certain expectations and commitments of both parties to the relationship. All who work in SoNE HEALTH are expected to:

- Represent our organization honestly and ethically in all your work activities and relationships on behalf of SoNE HEALTH.
- Properly use and protect SoNE HEALTH resources including materials and supplies, equipment, staff time and talents, and financial assets.
- Obtain your supervisor's approval before participating in any non-SoNE HEALTH activity during regular work hours or before using SoNE HEALTH equipment, supplies, materials or services for any activity unrelated to your work at SoNE HEALTH.
- Use good judgment and follow SoNE HEALTH's policies and procedures for business travel and expense reporting. You should not incur a financial loss or gain as a result of appropriate business travel.
- Prepare and maintain accurate and complete financial records of your activities on behalf of SoNE HEALTH, including accounting, budgeting, time and attendance, expense and other financial data and information.
- Never give false or misleading information to anyone doing business with SoNE HEALTH or competing with SoNE HEALTH.
- Properly safeguard and retain all SoNE HEALTH documents and records in all forms, including paper documents as well as electronic records, in accordance with SoNE HEALTH's record retention policies.
- Properly use and protect the confidentiality of all business or other information you use or encounter in your work at SoNE HEALTH.
- Follow all SoNE HEALTH policies governing the use of information and communication systems including access and appropriate use, limitations on personal use, and protecting the privacy and security of data and information.
- Respect the environment and follow all environmental laws, including operating of facilities with the necessary permits, approvals and controls. If collaborating with a

facility or practice within our network, follow all policies for the handling and disposal of hazardous materials and infectious waste.
- Maintain appropriate licenses, certifications and other credentials required of your position.
- Commit to your ongoing learning and development through completion of education and training programs assigned by SoNE HEALTH.
- Cooperate fully in any audits or investigations requiring your assistance and answer questions honestly and completely.

A relationship is not a one-way street. In recognition of your commitment, you should also expect that SoNE HEALTH will:

- Treat you with honesty, dignity and respect.
- Provide you a safe and supportive work environment free of harassment, intimidation or violence.
- Provide encouragement and support for your continued learning and development.
- Provide resources for your training and development, including assisting you in understanding the various laws, regulations and SoNE HEALTH policies that apply to your work.
- Provide a respectful work environment that allows you to freely ask questions, seek clarification when needed, and raise issues and concerns in good faith without fear of retaliation or harassment.
- Respond to your requests for information or assistance in a timely and supportive manner.

*Confidential and Proprietary Information*

We treat information about SoNE HEALTH's business operations as confidential and proprietary. This means we do not share information about SoNE HEALTH's operations or business strategies with the public. We take great care to share confidential and proprietary information only with individuals that have a need to know the information. Confidential information includes virtually any information not publicly known including individually identifiable patient, participant or member information, personnel data, lists, clinical information and quality data, financial reports, pricing and cost data, information related to affiliations, mergers, acquisitions and divestitures, strategic plans, marketing strategies, and supplier information and data.

Confidential and proprietary information is found in many different forms including paper records, electronic records, verbal and written communications, and various forms of media. The inappropriate sharing of this information can harm our network participants, patients, and others, and result in significant damage to our reputation.

*Use of Electronic Media*

All communication systems provided by SoNE HEALTH, including computers, email, instant messaging, intranet, Internet access, telephone and voice mail systems are the property of

SoNE HEALTH and are to be used primarily for business purposes. Limited personal use of such systems is permitted. However, SoNE HEALTH reserves the right to monitor all aspects of the usage of these systems for appropriateness and to ensure such usage supports the business goals of the organization. Users should not assume any of their interactions and communications when using these systems are private. Users are responsible for following all SoNE HEALTH policies regarding the appropriate access, use and security of electronic media in the workplace.

*Use of Social Media*

SoNE HEALTH expects all of who work in our organization to exercise good judgment and personal responsibility whenever using social media such as Facebook™, Twitter™, LinkedIn™ and other sites. Please keep in the mind the following:

- Do not post any SoNE HEALTH confidential or proprietary information to a social media site. This includes photographs and other information regarding patients, colleagues, suppliers or projects you are working on.
- Do not reference or otherwise associate SoNE HEALTH when using social media to solicit for, endorse or promote outside business ventures, political candidates or campaigns, or religious causes.
- The use of SoNE HEALTH-provided devices or communication systems to access the Internet or social media sites to view, post, transmit, download, or distribute threatening or harassing materials, profane, obscene or derogatory materials, or anything that could give rise to a violation of laws or regulations is strictly prohibited.
- Be respectful and professional when using a personal site or account that may identify you as a colleague of SoNE HEALTH.

## Questions & Answers

**Q.** There is a colleague in my department who regularly uses the Internet during work for personal activities. I am not in a position where I'm responsible to "police" other colleagues in my department and their use of work time. What should I do?

A. You should discuss this matter with your supervisor or a higher-level manager in your department. All colleagues have a responsibility to ensure that resources and assets used each day are substantially devoted to SoNE HEALTH activities. These resources include supplies, materials, equipment and colleague work time. The occasional personal use of technology resources, like the Internet, is allowed if it doesn't interfere with the colleague's work or violate any SoNE HEALTH policies.

**Q.** Before coming to work at SoNE HEALTH, I worked for a competitor organization and received information that might help our organization in negotiating more favorable contracts. Can I share this information with others in my organization?

A. No. Do not disclose confidential information you obtained from another job. We may not use this information in any business dealings. Further, it would be unethical for

you to share any confidential information you may learn from your employment with SoNE HEALTH with a future employer should you leave the organization.

**Q.** A colleague I work with frequently posts updates on Facebook and sometimes will make references to his day at work. Although he never mentions any patient names, he sometimes discusses unusual cases in far more detail than I feel comfortable. Should I be concerned?

A. Yes. Omitting a patient's name does not make it "okay" to discuss on a social media site such as Facebook. Omitting a name does not guarantee that the person cannot be identified. The uniqueness of the situation alone could allow people to reasonably identify the patient. Disclosure of confidential or sensitive information via social media not only puts our patients at risk, it also constitutes a violation of federal privacy laws which can lead to hefty fines and criminal penalties for both the organization and the colleague who made the posting. You should discuss this matter with your supervisor or contact the Integrity & Compliance Office for assistance.

**Q.** I recently witnessed some unusual activity occurring in our supply storage area. Several shipments of expensive computer equipment were delivered and then subsequently picked up by another company and taken away. I questioned my supervisor who gave me an explanation, but the more I think about it, the answer just doesn't seem to make sense. What should I do?

A. You should discuss the issue with a higher-level manager in your department or contact the Integrity & Compliance Office. The explanation you received may be correct and there may be nothing inappropriate occurring with the computer equipment. However, when there is something about an answer you receive that bothers you, or just doesn't feel right, it's best to discuss the issue with another member of management within SoNE HEALTH.

**Q.** I assist my boss in preparing her expense reimbursement reports. She often submits receipts for meals and entertainment expenses without specifying who was in attendance and without a description of the business purpose of the meeting. My boss is extremely busy and I don't like to bother her with questions that make it look like I don't trust her. What should I do?

A. First, make sure you clearly understand the specific documentation policies required for expense reimbursements at SoNE HEALTH. Share these requirements with your boss and explain you want to assist her in ensuring she provides all required documentation for her expense reimbursements. Ultimately she is responsible for the expense reimbursement claims submitted on her behalf. If this approach is not successful, contact a higher-level manager in SoNE HEALTH or the Chief Compliance & Privacy Officer for assistance.

## Resources to Assist You

This Code of Conduct addresses the more common issues and questions you may encounter in your work in SoNE HEALTH. Working in the health care industry is extremely challenging with complex and frequently changing rules and regulations. As a result, there may be times when the answer to a particular issue or question is not clear. You are responsible for seeking answers to your questions or concerns. Fortunately, there are many resources available to assist you.

### Where to Find Help

**Immediate Supervisor** - This is usually the best place to start in getting answers to your questions. Your supervisor understands the work you do and may already have the information you need or can direct you to the right resource. If your issue or concern involves your immediate supervisor, seek help from one of the other resources listed below.

**A Higher-Level Manager or Leader** – If you are not comfortable discussing the issue with your supervisor or do not agree or are uncomfortable with the answer you receive, discuss the issue with a higher-level manager or leader in your department or SoNE HEALTH.

**Human Resources** – Our Human Resources staff can likely answer many of your questions and assist you in addressing workplace issues and concerns.

**Chief Compliance & Privacy Officer** – The Chief Compliance & Privacy Officer is responsible for operation of the Integrity & Compliance Program. The Chief Compliance & Privacy Officer, and all members of the Integrity & Compliance Office, are available to assist you in obtaining answers to your compliance and privacy questions and concerns.

**Chief Information Officer** – SoNE HEALTH's Chief Information Officer is responsible for all information security matters related to our organization. Contact the Chief Information Officer if you have questions or concerns related to the protection of personal health information or confidential and proprietary business information.

**Risk Management and Patient Safety** – If you have questions or concerns related to patient care or safety, or are seeking guidance regarding the disclosure of medical errors or adverse events, please contact the Chief Population Health Officer. Many members of our network and

network participants have specific patient event reporting systems and processes designed to assist the reporting of “near misses”, errors and other events involving patient care or safety anonymously, if so desired. Depending on the services we are providing to our network, a participant’s policies and reporting processes may apply. Because these may vary across our facilities, all injuries, threats or “near misses” should be reported promptly to the Chief Population Health Officer, who will identify and facilitate any reporting that may be necessary or appropriate.

**Workplace Safety** – If you have questions or concerns related to workplace safety, or are seeking guidance regarding the disclosure of workplace safety events, contact the Human Resources department. All colleague injuries, threats or “near misses” should be reported promptly to the colleague’s supervisor and to the Human Resources department.

## Compliance Hotline

You are encouraged to use one of the resources listed here to address your questions and concerns. However, if you are not comfortable using these resources or if the resources used have not fully resolved your concern, please contact the Compliance Hotline at 800.401.8004. You may also file a report online at www.lighthouse-servcies.com/sfhcp. You may choose to remain anonymous and all reports are treated confidentially.

The Compliance Hotline is staffed 24 hours a day, seven days a week by an outside organization on behalf of SoNE HEALTH. When you call the Compliance Hotline, you will speak with an individual trained to listen to your questions and concerns and to gather as much information from you as possible. If you prefer, you may submit your issue online at the website address listed above. Using either method, your report will not be traced or recorded, and the Compliance Hotline does not use caller ID. When submitting a report through either the Compliance Hotline phone or online system you may choose to remain anonymous. SoNE HEALTH uses every effort to maintain, within the limits of the law, the confidentiality and identity of any individual who reports issues and concerns. Your report will be provided to SoNE HEALTH for review and investigation. When using the phone system to file a report, you will be provided a report identification number for you to check back later on the status and ultimate resolution of your report.

## Obligation to Speak Up

SoNE HEALTH values your opinions, insight and feedback. The most efficient way to resolve concerns is through the internal resources listed on page 29. SoNE HEALTH promotes an environment that encourages all to seek answers to questions and to report issues and concerns. Each SoNE HEALTH colleague has a right and a duty to report any activity they believe may violate applicable laws, regulations, professional standards of practice, or this Code of Conduct using one or more of the resources listed herein. If the matter has previously been reported and the colleague believes it has not been given sufficient attention, he or she should report the matter to a higher level of management, the Chief Compliance & Privacy Officer, or the Compliance Hotline.

**Non-Retaliation Policy**

SoNE HEALTH has a policy of “zero tolerance” for any form of retaliation against those who report issues and concerns in good faith, including potential violations of our Code of Conduct. Retaliation includes direct as well as indirect actions, or the threat of actions, of supervisors, co-workers, or others. Retaliation is subject to discipline, up to and including dismissal from employment, suspension of membership privileges, or termination of business relationships with SoNE HEALTH, in accordance with SoNE HEALTH policies, as applicable.

**Acknowledgment Process**

All SoNE HEALTH colleagues are required to acknowledge their receipt and review of this Code of Conduct, confirm they understand it represents the mandatory policies of SoNE HEALTH and agree to abide by it. New colleagues are required to do so as a condition of employment and all SoNE HEALTH colleagues are required to participate in annual Code of Conduct training designed to reinforce awareness and understanding of its requirements. Adherence to and support of our Code of Conduct and participation in related training activities is considered in decisions regarding hiring, promotion and compensation for all SoNE HEALTH colleagues.

Thank you for all that you do to support Integrity & Compliance at SoNE HEALTH.

## Acknowledgment and Certification

*Note: This acknowledgment may also be obtained electronically, such as in connection with the new employee orientation process and annual Integrity & Compliance training. Contact Human Resources or you're the Integrity & Compliance Office if you have any questions about this process*.

I acknowledge that I have received a copy of the SoNE HEALTH Code of Conduct and I agree to read it completely. I also agree to discuss any questions or concerns with the Code of Conduct with my supervisor or a higher-level manager in SoNE HEALTH. I certify that I will comply with the Code of Conduct and any other policies established by SoNE HEALTH that apply to my role. I understand it is my responsibility and obligation to report any issues or concerns regarding possible violation of the Code of Conduct. I also understand I may be asked to cooperate in an investigation and agree to do so if asked. I understand that SoNE HEALTH will not retaliate against me for making a report of issues and concerns in good faith. I understand the Code of Conduct contains standards of behavior I am expected to follow as a condition of my employment in SoNE HEALTH and is not an employment contract. I also understand the standards may be amended, modified or clarified at any time and I that I will receive periodic updates as they may occur.

Name (Print): _____

Department: _____

Signature: _____

Date: _____