In keeping with our commitment to enforce an effective Compliance Program, we have adopted the

**BUSINESS & PROFESSIONAL STANDARDS OF CONDUCT**

These Standards of Conduct apply to all of us and serve as the foundation for our Corporate Compliance Program.
The Infirmary Health Business and Professional Standards of Conduct provide guidance for us in the workplace. If you are faced with an uncomfortable situation not described within this document, you should contact your immediate supervisor and let fairness and respect for others guide your actions. The Compliance Department is always available to respond to issues that you may have and the hotline is available in the event that anonymity is desired.

These Standards apply to every person associated with Infirmary Health (IH), including officers, employees, board members, physicians, non-physician practitioners, volunteers, vendors, contractors, subcontractors, and agents. These standards also apply to anyone who provides patient care items or services or performs billing or coding functions on behalf of IH. These persons are referred to throughout these Standards as “Covered Persons.” IH and all Covered Persons are obligated to understand and comply with these Business and Professional Standards of Conduct and must also commit to full compliance with all Federal health care program requirements and IH’ Policies and Procedures. An environment that promotes integrity is a healthy one that will help to bring out the best in each of us.

**BUSINESS STANDARDS**

**Regulatory Compliance**

IH will not tolerate activities of fraud and abuse related to its operations and relationships with outside third parties. IH is committed to providing all Covered Persons with the proper education and information needed for compliance with federal and state laws. These laws impose strong fines and penalties for dishonest behavior. Some examples of activity that are considered fraud or abuse are:

- Illegal patient referrals
- Filing claims for services not rendered
- Duplicate billings
- Billing the wrong codes
- Providing unnecessary services
- Improper business relationships with third parties
- Noncompliant arrangements and contracts with potential or actual referral sources of health care business

Compliance with federal and state laws requiring accurate submission of bills, statements, and reports, and other information to the government is a condition of employment. Through the IH Corporate Compliance Plan, IH commits to a comprehensive program of detection and prevention of health care fraud, waste, and abuse. All Covered Persons are required to make good faith reports of any identified issues or questions associated with IH’s policies, conduct, practices, or procedures with respect to Federal or State health care programs believed by the individual to be a potential violation of criminal, civil, or administrative law to the Compliance Officer, Compliance Hotline, or any member of Executive Leadership. We also require all Covered Persons to recognize and adhere to all federal and state laws that prohibit the
submission of false claims and statements and to acknowledge the commitment of IH to be compliant with federal and state laws.

We will continuously monitor our business activities to ensure that we are in compliance with applicable federal and state laws and regulations. If we become the subject of a review by a regulatory agency, we will cooperate fully. Any information to which an authorized reviewing agency is legally entitled will be made available. Medical and financial records will be stored according to federal and state statutes and regulations. The records will also not be altered, removed or destroyed, except in accordance with IH’s document retention policies.

Conflicts of Interest
Everyone is expected to devote their full time and energy to IH during scheduled working hours. A “conflict of interest” happens when personal interests come before the interests of IH. We are not allowed to use our jobs for personal gain at the System’s expense. If you are not sure about a situation that may seem like a conflict of interest, ask your manager or contact the IH Compliance Department. Some examples of conflicts of interest are:

- Accepting anything of value that may be looked upon as an attempt by the offering party to receive special treatment. Any small gifts, favors, or modest refreshments must be unsolicited from other parties and happen only rarely. Accepting expensive gifts, lodging, meals, or entertainment because of your position with IH may be perceived as a bribe.

- Creating business relationships on behalf of IH with Covered Persons for personal reasons. Business decisions should be made on the ability of the Covered Person to meet the needs of IH.

- Acting on behalf of IH to lobby or become involved in political activities without prior approval. Unless approved, participation with government organizations must be done on your time with your money.

- Involvement in outside employment or other activities that may affect your job performance at IH. Outside employment should be approved, in advance, by your supervisor.

- Working with outside boards or committees that have a relationship with IH. Although we encourage Covered Persons to be active in their communities, that service should not conflict with the mission of IH.

Provider Qualifications
IH staff members providing direct patient care are required to be properly licensed and credentialed. Their duties will be limited to those defined by their licensure.

Contracts
Agreements between IH and any actual or potential source of health care business or referrals or any actual or potential recipient of health care business or referrals from IH or any physician or
physician’s immediate family member must be in writing, impartial and meet the requirements of the Anti-Kickback Statute, Stark Law, and other applicable requirements. IH has adopted and implemented a Nonmonetary Compensation Policy which requires the tracking of nonmonetary items provided to physicians in order to remain compliant with federal requirements.

**Disclosures**
Any Covered Person that is excluded, debarred, suspended or otherwise ineligible to participate in a Federal or State health care program or in a Federal or State procurement or nonprocurement program or has been convicted of a criminal offense that falls within the scope of the exclusionary authority of the Office of Inspector General but has not yet been excluded, debarred, suspended or otherwise declared ineligible will not be allowed to do business with IH. All Covered Persons are required to immediately disclose any and all such instances or events to the IH Compliance Department.

**Financial Information**
IH is committed to accurately and promptly reflecting financial information. We have created internal accounting controls to make sure financial transactions are properly approved and relate to our business purpose. Our financial information is audited each year by an independent, external auditing firm to ensure conformity with accounting principles. We will not share information or records with anyone who does not have a business or legal need to know.

**Marketing & Advertising**
We are committed to being accurate and truthful in the advertising and marketing of our System. Any IH information provided to the local media must be cleared with our Marketing/Communications Department before its release.

**Protection of IH Assets**
We should treat IH property and equipment with respect. The use of company time, supplies, tools, or facilities for personal use is not allowed. No Covered Person may remove or borrow company property without permission.

**Use of Electronic Media**
IH provides e-mail and internet access to its employees for more open and timely communication. These work tools should be used in a professional manner for job-related functions and education. IH will only use legally licensed software. The use of pirated or unlicensed software is illegal and violates IH policy.
PROFESSIONAL STANDARDS

Our Mission is LIFE…this requires that we focus our collective efforts toward helping our patients achieve the best quality of life possible. We believe this goal is achievable because “Our People are the Difference”. We personally value and actively demonstrate our organization’s Core Values and behaviors through:

- **Leadership** – Setting the example
- **Integrity** – Doing the right thing
- **Family** – Supporting each other along the way
- **Excellent Service** – Exceeding our customers’ expectations

IH is committed to preserving the rights of others. All Covered Persons are expected to respect our patients, visitors, staff, physicians, and vendors in all aspects of our daily activities. We are expected to cultivate an environment that promotes respect, dignity, and courtesy for every individual. Through these efforts, our ultimate goal is to make all those who choose to visit or provide services within the System feel welcome and appreciated in their relationship with IH.

In our efforts to provide the highest quality patient care possible, we encourage and expect patients to participate in health care decisions. It is also understood that with the privilege of providing health care to our community comes the obligation to meet all HIPAA and HITECH requirements to protect all protected health information and provide access to that information upon patient request. All IH staff must access protected health information only for work-related purposes and in order to perform their respective duties.

We are also committed to the protection of personal, employment, and financial information regarding our employees and the System. IH will take appropriate steps to provide safety and security in order to develop an environment of trust, honesty and fairness.

We all have the right to a harassment-free setting. Our System supports a cooperative, professional environment.

As we are faced with our daily tasks, clear communication among us is critical. We must be able to resolve differences and work together as a team to reach our goals. We should appreciate the diversity of our workforce and respect the individuality of each person.

We strive to do things fairly, ethically, and legally. In order to promote fair treatment, IH will protect each person from punishment or harassment for identifying misconduct. No action will be taken or threatened against an employee for filing a complaint or disclosing information in good faith. Failure to comply with these Business and Professional Standards of Conduct can lead to disciplinary action, including the possible termination of employment or a contractual arrangement, as applicable.

We are obligated to promote a positive, ethical work environment for all Covered Persons and others who come in contact with Infirmary Health. Each individual is responsible for asking
questions, seeking guidance, and expressing concerns related to compliance with these Business and Professional Standards of Conduct. IH maintains a system to log and address concerns reported to the Compliance Officer, Compliance Department, or through the Compliance Hotline. Each person has the right to use this Compliance Reporting System to report any concerns or issues and can expect IH to honor its commitment of nonretaliation and to maintain, as appropriate, confidentiality and anonymity when reports are made.

**Compliance “Hotline”: (251) 435-2006 and toll free at (800) 431-2590**

Your telephone number for reporting potential misconduct relating to:

- Billing fraud/abuse
- Coding fraud/abuse
- Conflicts of interest
- Bribes/excessive gifts
- Misuse of IH property
- Improper business relationships or contractual arrangements

You do not have to give your name and will be protected against retaliation.

For employee relation issues, please call the Employee Service Center at (251) 435-2211.