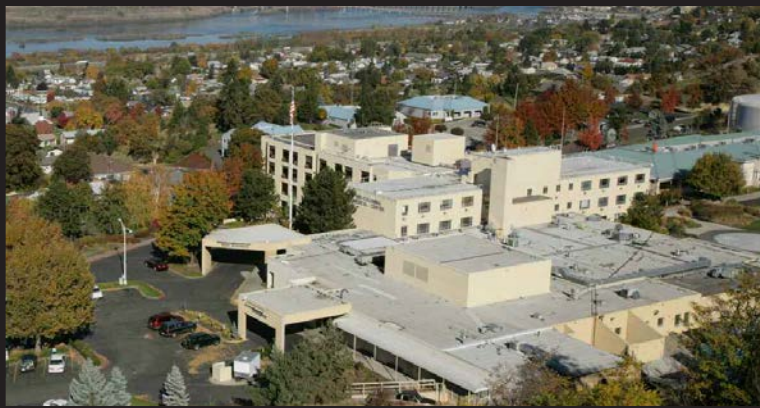


ORGANIZATIONAL Code of Conduct

Serving our Community



MCMC

A Planetree Patient-Centered Hospital

Dear Colleague

Mid-Columbia Medical Center (MCMC) has a comprehensive, values-based corporate compliance program, which is a vital part of the way we conduct ourselves at MCMC. The program rests on our mission and values, it has been built into our daily activities supporting our tradition of caring for our patients, our community and our employees. We strive to deliver healthcare compassionately and to act with absolute integrity in the way we do our work and the way we live our lives.

This code of conduct, referred to as the “code,” reflects our tradition of serving our community and provides guidance to ensure our work is done in an ethical manner. This code applies to all levels of the organization (staff, managers, directors, administrators and board members). It emphasizes the shared common values and culture which guide our actions. It also contains resources to help resolve any questions about appropriate conduct in the work place. Your loyalty to its spirit, as well as its specific requirements, is critical to the ethical culture of our organization.

Please review this code thoroughly, if you have questions regarding this code or come across any situation which you believe violates requirements of this code, you should immediately consult your supervisor, another member of management, the human resources manager, the MCMC compliance hotline (1-855-506-5740) or the corporate compliance officer. You have my personal assurance there will be no retribution for asking questions or raising concerns about this code or for reporting possible improper conduct.



No code can substitute for each person’s own internal sense of fairness, honesty and integrity. In your daily life and work, if you come across a situation or are considering a course of action that does not feel right, please discuss the situation with any of the resources mentioned.

We have a rich heritage, which is reflected in our mission and values statement and in this code. We are equally committed to assuring our actions consistently reflect our words. In this spirit, we want our organization to be a community of shared values and we expect all of our employees’ actions to reflect the high standards set forth in this code. We ask you to assist us and all of our employees in this organization in supporting the values and principles that are critical to continuing our tradition of serving our community.

Sincerely,

Dennis Knox
President & CEO

Our Core Values

Our organization is value driven and principle centered, serving our patients, employees, customers and community within the Columbia River Region.

WE VALUE...

- The individual as a whole human being with unique and diverse interdependent physical, spiritual, emotional and social needs.
- Professionalism, respect, dignity and confidentiality in all interpersonal relationships.
- Environments that promote wellness, health and healing.
- The mind's influence and its importance on health and healing.
- The educational process that supports participation in health decisions through access to accurate and understandable information.
- Integrity, honesty and open communication in all relationships.
- Employees as partners, decision makers and ambassadors of our mission and values.
- Innovation by rewarding creative risk-taking in the pursuit of excellence.
- Leadership that exemplifies and promotes teamwork, flexibility, caring and commitment to innovation and excellence.
- Efficient use of resources through partnerships and strategic alliances that provide financial strength, high-quality care and services.

Purpose of the Code of Conduct

Our code provides guidance to all MCMC employees and assists us in carrying out our daily activities within suitable ethical and legal standards. The success of MCMC rests on us building ethical relationships with our patients, affiliated physicians, third-party payers, subcontractors, independent contractors, vendors, consultants and one another. To achieve our mission and core values, we must commit to conducting our business activities in an honest, fair and ethical manner.

This code is a critical part of our overall corporate compliance program. We have developed this code to ensure we meet our ethical standards and comply with applicable laws and regulations. Our mission and core values provide guidance and inspiration as we make sound, ethical choices to deliver quality care and services while meeting organizational goals.

This code is intended to be thorough and easily understood. This code provides us with a set of standards that guides our decision-making and our commitment to our mission and core values. This means conducting our business within appropriate ethical, legal and regulatory standards and complying with MCMC's policies and procedures. In some instances, this code deals fully with the subject covered. In many cases, however, the subject requires additional guidance for those directly involved with the specific area to have enough direction. To provide additional guidance, we have referenced policies and procedures which may be accessed on the connections page under policies. Those policies expand upon or enhance many of the principles expressed in this code.

The standards set forth in this code apply to all MCMC facilities, employees or partners. The standards are mandatory and must be followed.

Mission Statement

- To lead and act as a catalyst in promoting health for all people.
- To recognize the individual as a whole human being with different needs that must be enthusiastically met.
- To communicate a vision of health, art, education, technology and a center for healing which will continually upgrade the quality of life in the community environment in which we all live.
- To empower people to become partners in their health care.

How Should I Use This Code of Conduct?

Our code asks you to reflect on our mission and core values as you apply ethical and legal standards to your work. This code helps you to answer these questions:

- Are my actions and decisions consistent with MCMC's mission and core values?
- Am I supporting the spirit, as well as the letter of laws, regulations, policies, or standards?
- Can I explain my actions or decisions without embarrassment to family, friends, co-workers, or patients?
- Would my behavior harm MCMC's reputation in the community?
- Who should I contact if I believe a violation has occurred?
- What do I do if retaliation occurs when I raise a concern?
- Who can help me if I still have a question?
- How do I contact my compliance and privacy officers?



Our Commitment to Stakeholders

We affirm the following commitments to MCMC stakeholders:

TO OUR PATIENTS: We are committed to providing quality care that is sensitive, compassionate, promptly delivered and cost effective.

TO OUR MCMC EMPLOYEES: We are committed to a work setting which treats all employees with fairness, dignity and respect and provides an opportunity to grow, to develop professionally and to work in a team environment where all ideas are heard.

TO OUR AFFILIATED PHYSICIANS: We are committed to providing a work environment which has excellent facilities, modern equipment and outstanding professional support.

TO OUR THIRD-PARTY PAYERS: We are committed to doing business in a way that demonstrates our commitment to quality healthcare, efficiency and cost effectiveness.

TO OUR REGULATORS: We are committed to an environment in which compliance with rules, regulations and sound business practices is a part of our corporate culture. We accept the responsibility to self-govern and monitor adherence to the requirements of law and to our code.

TO OUR BUSINESS PARTNERS: We are committed to fully performing our responsibilities to manage our business relationships in a manner that reflects the mission and values of each of our organizations.

TO THE COMMUNITIES WE SERVE: We are committed to understanding the needs of the communities we serve and provide quality, cost-effective healthcare. As an organization we have a responsibility to help those in need. We proudly support charitable contributions and events in the communities we serve, in an effort to promote good will and further community benefit.

TO OUR SUPPLIERS: We are committed to fair competition among prospective suppliers and the sense of responsibility required of a good customer. We encourage our suppliers to adopt their own set of comparable ethical principles.

TO OUR VOLUNTEERS: We are committed to ensuring that our volunteers feel a sense of meaningfulness from their volunteer work and receive recognition for their volunteer efforts.

**The term "stakeholder" refers to those groups of individuals to whom our institution sees itself as having obligations.*

Ethics and Compliance

We value integrity, honesty and open communication in all relationships.

Our Corporate Compliance Program

MCMC is committed to ethical behavior in all our actions. The corporate compliance program (CCP) displays MCMC's commitment to the highest standards of ethics and compliance. All of us are required to be in compliance with laws, regulations, this code of conduct and MCMC policies/procedures and standards. Our corporate compliance program applies to caregivers/employees; members of our system; board of trustees; volunteers; trainees; independent contractors; and others under the direct control of MCMC.

The compliance committee, executive management team and board of trustees provide oversight and direction for the corporate compliance program. The vice president of finance serves as MCMC's chief compliance officer, reporting directly to the CEO and board of trustees.

The corporate compliance officer is responsible for the day to day direction and implementation of the corporate compliance program. This includes developing resources such as policies, procedures, education programs and communication tools and providing support like managing reporting mechanisms or conducting program assessments and providing advice.

MCMC's human resource staff is also highly knowledgeable about many of the employment and workplace compliance-risk areas described in this code. You are encouraged to report any concerns about your work situation to human resources. MCMC's corporate compliance officer works very closely with human resources to investigate and resolve matters relating to employment and workplace situations.

Personal Obligation to Report

Each of us has the responsibility to report any activity that appears to violate laws, rules, regulations, standards, federal health care conditions of participation or this code. By reporting misconduct you help contribute to the ethical culture of MCMC.

If after reporting the activity you still doubt if the issue has been given enough attention, you can report the matter to our corporate compliance officer or the compliance hotline until you are satisfied that the matter has been recognized and or addressed.

If a concern regarding the safety or quality of care provided to a patient in the hospital was reported to our organization but not addressed or resolved, the reporting individual may notify The Joint Commission. There will be no retaliatory disciplinary action taken against an employee who reports concerns to The Joint Commission. *For further guidance please see the "Reporting of Non-Compliance Policy."*

Reporting Concerns

If an employee has a concern that is a serious or immediate compliance risk that can significantly affect licensure, reimbursement and accreditation or may lead to a major legal claim, report these concerns to your department director or our corporate compliance officer immediately. Safety of our patients and caregivers/employees is a top priority of MCMC. Any safety concerns should be reported to our safety officer immediately. Any clinical incidents should be reported through our internal occurrence reporting system (ORS) system to be reviewed by our risk management department.

To obtain further guidance on an ethics and compliance issue or to report a suspected violation of our Code of Conduct:

DISCUSS the situation with your supervisor; **DISCUSS** the situation with a member of management or compliance officer; or **CALL** the compliance hotline line at 1-855-506-5740.

Do You Know Who to Contact?

Ethical, compliance and legal concerns are reported using any of these options:

- 1** Discuss the matter or concern with your immediate supervisor.
- 2** Discuss the matter or concern with your department director.
- 3** Contact the corporate compliance officer, risk officer, or safety officer.
- 4** Call the compliance hotline to report concerns anonymously at **1-855-506-5740**.

If you report a concern anonymously, it is important to clearly describe the situation, provide a facility location and give enough detail so that your concern can be properly investigated and resolved.

Confidentiality of Reports

MCMC makes every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports concerns or possible misconduct. There is no retribution or discipline for anyone who reports a concern in good faith. Any employee who deliberately makes a false accusation with the purpose of harming or retaliating against another employee may be subject to discipline.

We will not Tolerate Retaliation, Retribution or Intimidation

MCMC does not allow any retaliation, retribution, or intimidation actions directed towards an MCMC workforce member for reporting a concern in good faith, or assisting in the investigation or audit of a concern. A manager, supervisor, caregiver/employee or other workforce member who engages in these types of behavior directed at a person who raises a concern, is believed to have raised a concern or assists in an investigation or audit will be subject to disciplinary action in accordance with MCMC policy. *For further guidance please see the "Non-Retaliation and Non-Retribution for Reporting Policy."*

Internal Investigations of Reports

We are committed to investigating all reported concerns promptly and methodically. The corporate compliance officer coordinates any findings from corporate-led

investigations and immediately recommends corrective action or changes that need to be made. We expect all employees to cooperate with investigation efforts. *For further guidance please see the "Internal Investigation Policy."*

Corrective Action

Where an internal investigation proves or supports a reported violation has occurred, MCMC will begin corrective action. This corrective action may include making prompt repayment of any overpayment amounts, notifying the correct governmental agency, providing disciplinary action if necessary and fulfilling organizational changes to prevent a similar situation from happening again in the future.

Discipline

Disciplinary action will be taken with anyone who goes against this code. The precise discipline utilized will depend on the nature, severity and frequency of the violation and may result in any or all of the following disciplinary actions:

- Oral warning;
- Written warning;
- Written reprimand;
- Suspension;
- Termination; and/or
- Restitution.

Check Your Understanding

What are Employee Responsibilities?

- Follow the MCMC code.
- Perform our job duties in accordance with all federal and state laws or regulations that apply.
- Participate in corporate compliance program training and job-specific compliance education or departmental training as necessary for our job duties.
- Report all concerns or possible violations promptly.
- Keep information obtained at MCMC confidential.
- Whenever in doubt about something, ask questions.



What are Leadership Responsibilities?

- Support the MCMC commitment to uphold our mission and core values.
- Model ethical behavior and foster a culture of transparency and trust by listening and being receptive to workforce members and others' concerns about compliance related matters.
- Ensure that written compliance policies and procedures specific to your department are developed and followed.
- Provide employees with initial and continuing compliance education and document that education.
- Monitor your department to ensure compliance with the code, MCMC policies and standards, federal and state laws and regulations.
- Take appropriate corrective or disciplinary action to resolve matters when necessary, while involving human resources guidelines.
- Prevent retaliation, intimidation, or retribution against any employee who reports, supplies information about, or assists in an investigation or audit of compliance concern.

Patient Standards

We value environments that promote wellness, health and healing.

Quality of Care and Patient Safety

We are committed to the delivery of safe, effective, efficient, compassionate and satisfying patient care. We treat all patients with warmth, respect and dignity and provide care that is both necessary and appropriate. As a general principle, MCMC aspires to a standard of excellence for all caregivers within our facilities; we are committed to the delivery of safe, effective, efficient, compassionate and satisfying care and services.

Each of us is responsible for being aware of the following guidelines for the quality of patient care. These include: Conditions of Participation of the Centers for Medicare and Medicaid Services (CMS), the standards and surveys of The Joint Commission (TJC) and the consensus measures of the National Quality Forum.

This commitment to quality of care and patient safety is a responsibility of every MCMC employee. Any time an MCMC employee has a question about if the quality or patient safety commitments are being met, we are required to raise this concern with a direct supervisor, the ORS system, or the director of performance and quality systems. Each of us are provided resources and guidance on how to ask for involvement or review by external quality partners including The Joint Commission, state survey agencies or state quality improvement organizations. *For further guidance please see the "Culture of Safety and Quality Policy."*

Patient Rights

We offer no difference in the availability of services; admission, transfer or discharge of patients; or in the care we provide based on age, gender, disability, race, color, religion, sex, sexual orientation, gender identity, or national origin.

Our facilities respect the patient's right for communication. We try to make sure our patients and/or their representatives have the information necessary to exercise their rights.

Each patient is provided with a written statement of patient rights and a notice of privacy practices. These statements meet all applicable state and federal laws. These statements include the following rights:

- Rights of a patient to make decisions regarding their medical care;
- the right to refuse or accept treatment;
- the right to informed decision-making; and
- rights related to patient health information maintained by MCMC.

For further guidance please see the "Patients' Rights and Responsibilities Policy."

Emergency Treatment

We follow the Emergency Medical Treatment and Active Labor Act ("EMTALA") in providing an emergency medical screening examination and necessary stabilization to all patients, regardless of ability to pay. In an emergency or if the patient is in labor, we will not delay the medical screening and stabilizing treatment in order to seek financial and personal information.

Patients with emergency medical conditions are only transferred to another facility at the patient's request or if the patient's medical needs cannot be met at the MCMC facility (e.g., we do not have the capacity or capability) and suitable care is knowingly available at another facility. *For further guidance please see the "EMTALA Medical Screening Examination" and related sections on the connections page.*

Patient Information

We collect information about our patient's medical condition, history, medication and family illnesses in order to provide quality care. The following federal and state laws protect privacy and security of a patient's information: the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Act (HITECH). Following these laws we do not:

- Use
- Disclose
- Discuss

patient-specific information, including patient financial information, with others unless it is necessary to serve the patient or required by law.

No MCMC employee, affiliated physician, or other healthcare partner has a right to any patient information other than what is necessary to perform his or her job. *For further guidance please see the HIPAA section of our Connections page for all related forms, policies and procedures.*

Questions to Ask to Ensure you are Protecting Patient Privacy:

- Do I have a need to know this information as part of my job?
- Can I get my job done without reviewing all of the patient's information?
- Do I understand the policies and procedures that apply to this information?
- Do I avoid sharing this information in public, including public venues such as social networking sites?
- Do I protect this information from being viewed or seen by others?
- Have I properly disposed of the patient's information?
- If I am unsure about accessing information, do I get approval from my manager or the organizations privacy officer?

Best Practices for Safeguarding Patient Information

- Do not leave patient information visible on computer screens. Lock your screen or log off your workstation when you walk away.
- Do not leave charts or other confidential information open and visible on desks or counters.
- Shred printed documents containing patient data when you are done using them or place in designated secure shred bins.
- Use the minimum necessary of information for payment and operations purposes.
- Avoid patient-related discussions in public areas and on social networking sites.
- Avoid informal or casual discussions of patient situations that are not directly related to work.
- Do not leave voice or phone messages containing detailed sensitive information.
- Avoid inadvertent disclosures by taking special care in situations that are not private.
- Follow secure email and fax policies for transmitting PHI and only send to those with a need to know.
- Double-check fax numbers to ensure a fax is directed to the correct recipient. If a fax is sent in error, immediately contact the recipient and request the faxed information be returned to us.
- Use a fax cover sheet.
- Double check documents taken off shared printers before handing to patients, putting in envelopes or faxing.
- Do not take data off site, except as necessary and in accordance with MCMC and department policies.
- Never leave patient data, whether stored on an electronic device or on paper unattended. It must always be in the possession of a MCMC employee or agent, or in a secure location.

MCMC HIPAA Privacy Breach Reporting

1. Contact your immediate supervisor or department director.
2. Immediately complete a detailed report on the ORS system with all the information about the incident.
3. The MCMC privacy officer will follow up with you shortly.

Workplace Standards

We value employees as partners, decision makers and ambassadors of our mission and values.

Harassment and Workplace Violence

All of us have the right to work in an environment free of harassment and disruptive behavior. MCMC does not accept harassment by anyone based on the diverse individuality or cultural backgrounds of those who work with us. Hurtful or embarrassing jokes, slurs, bullying, or other harassing conduct is not acceptable in our workplace.

Sexual harassment is not allowed. This includes unwelcome sexual attention or requests for sexual favors in relation with employment decisions. Verbal or physical conduct of a sexual nature that gets in the way of an individual's work performance or creates a fearful, uncomfortable, or unpleasant work place is not allowed at MCMC.

Harassment also includes events of workplace violence, which includes robbery and other crimes like stalking, violence directed at the employer, terrorism and hate crimes committed by current or former employees. Employees who observe or experience any form of harassment or violence should report the event immediately. *For further guidance please see the "Zero Tolerance Anti-Harassment Policy."*

Health and Safety

MCMC facilities fulfill all government regulations and rules through policies that promote the protection of workplace health and safety. We are all responsible to be familiar with and understand how these policies apply to our job duties and to seek advice when we have a question or concern. We have a responsibility to quickly report any serious workplace injury or any situation presenting a danger of injury. *For further guidance please see "Safety Management Plan."*

Controlled Substances

Some of our co-workers routinely have access to prescription drugs, controlled substances and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations and must be administered by physician order only. Prescription and controlled medications and supplies must be handled properly and only by approved individuals to reduce risks to us and to patients. If anyone becomes aware of poor security for drugs or controlled substances or the diverting of drugs from the organization, the event must be reported immediately to the corporate compliance officer. MCMC facilities strictly enforce reporting of any violations of diverting medications by facility staff or privileged practitioners.

Alcohol and Drug Use

"To protect the interests of our co-workers and patients, MCMC is committed to an alcohol and drug-free work place. We must all report for work free of the effects of alcohol and illegal drugs. Reporting to work under the effects of or having in your system any illegal drug or alcohol; or using, possessing, or selling illegal drugs while on MCMC work time or property may result in immediate termination. MCMC may use drug testing as a means of enforcing this policy.

Individuals may be taking prescription or over-the-counter drugs, which may impair judgment or other skills required in job performance. Employees with questions about the effect of such medication on their performance or who observe an individual who appears to be impaired in the performance of his or her job must immediately consult with their supervisor or risk management department. *For further guidance see the "Alcohol and Drug Free Workplace Policy."*

Use of MCMC Resources

Our assets should only be used for valid business purposes. Minor personal use of computers is permitted provided such use is not for personal financial benefit or gain and does not interfere with our job or the ability of others to do their jobs. *If you have a question about the use of MCMC resources, please contact your supervisor for guidance.*

Environmental Compliance

MCMC will comply with all environmental laws and regulations as they relate to our organization's operations. We act to preserve our natural resources to the full extent reasonably possible. We operate each of our facilities with the necessary permits, approvals and controls. We carefully follow the proper actions to provide a good environment of care and to prevent pollution.

In helping MCMC comply with these laws and regulations, all MCMC employees must understand how job duties may impact the environment, adhere to all requirements for the proper handling of hazardous materials and immediately alert supervisors to any situation regarding the discharge of a hazardous substance, improper disposal of hazardous and medical waste, or any situation which may be potentially damaging to the environment. *For further guidance see the "Hazardous Materials" section on the Connections Policies page.*

Legal and Regulatory Compliance

We value professionalism, respect, dignity and confidentiality in all interpersonal relationships.

MCMC provides varied healthcare services in different types of facilities. These services are provided following the appropriate federal, state and local laws and regulations and the conditions of participation for federal healthcare programs. Such laws, regulations and conditions of participation may include, but are not limited to subjects such as:

- certificates of need,
- licenses,
- permits,
- accreditation,
- access to treatment,
- consent to treatment,
- medical record-keeping,
- access to medical records and confidentiality,
- patients' rights,
- clinical research,
- end-of-life care decision-making,
- medical staff membership and clinical privileges,
- corporate practice of medicine restrictions and
- Medicare and Medicaid program requirements.

MCMC is subject to numerous other laws in addition to these healthcare laws, regulations and the conditions of participation.

We have developed policies and procedures to address many legal, accreditation, certification and regulatory requirements. While we are not able to develop policies and procedures that cover every law we must still be aware of and follow those laws, standards, conditions and regulations not covered in organization policies and procedures. If you have any questions please ask for advice about human resources, legal, regulatory, standards and the conditions of participation requirements.

Anyone aware of violations or suspected violations of laws, regulations, standards and the conditions of participation, or company policies and procedures must report them immediately to a supervisor or member of management,

the human resources department, the corporate compliance officer, or the compliance hotline. *For further guidance see the "Reporting of Non-Compliance Policy."*

License and Certification Renewals

Employees, individuals retained as independent contractors and privileged practitioners in positions which require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials and to comply at all times with federal and state requirements applicable to their disciplines.

To assure compliance, MCMC may require evidence of the individual having a current license or credential status. MCMC does not allow any employee, independent contractor or privileged practitioner to work without valid, current licenses or credentials. Each employee must have evidence of current and valid licensure, certification, registration, accreditation or credential as required by their position description. *For further guidance please see the "Employee Licensing Updating Policy."*

Excluded Individuals

We do not contract with, employ, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal healthcare programs; suspended or debarred from federal government contracts and has not been reinstated in a federal healthcare program after a period of exclusion, suspension, debarment, or ineligibility. We routinely search the Department of Health and Human Services' Office of Inspector General and General Services Administration's lists of such excluded and ineligible persons. Workforce members at any MCMC facility are required to report to human resources or the compliance officer if they become excluded, debarred, or ineligible to participate in federal healthcare programs. *For further guidance please see the "Exclusion Screening Policy."*

Gifts and Entertainment

Accepting gifts and offers of entertainment creates a risk that our judgment and decisions can be influenced. In some cases acceptance of gifts and entertainment may be considered a violation of federal and or state laws.

MCMC's reputation is based on our commitment to the integrity in our delivery of quality patient care and services. For this reason, MCMC employees are expected to keep relationships with our patients and their family member, vendors, non-employed physicians and their offices and other third parties impartial and avoid accepting gifts or other items of value including:

- Meals
- Tickets to events
- Special favors or loans
- Discounts or free services
- Tips and gratuities
- Paid travel for spouses

We may never accept cash or cash equivalents from anyone outside of MCMC for activities related to our work

at MCMC. Gifts should not be accepted with a value over \$75 each year per person and per vendor. *For further guidance please see the "Offers of Gifts, Favors and Honoraria Policy."*

Conflict of Interest

A conflict of interest may occur when our personal interests or activities influence or appear to influence our actions and decisions. They also occur when we allow another interest to be more important to our decision than the interest of MCMC and its patients, members, residents, or customers.

MCMC employees are obligated to ensure we remain free of conflicts of interest in the performance of our responsibilities at MCMC. If employees have any question about whether an outside activity or private interest might constitute a conflict of interest, they must notify the corporate compliance officer and be given approval before pursuing the activity or obtaining or retaining the interest. Clinical decisions will be made without regard to compensation or financial risk to MCMC leaders, managers, clinical staff, or licensed, independent practitioners. *For further guidance please see the "Conflict of Interest Policy and Disclosure."*

Questions to Ask Before Accepting a Gift from a Non-MCMC Entity:

- Is this a personal gift?
- Is this a cash gift? A gift card? A gift certificate?
- Would I feel uncomfortable disclosing acceptance of this gift to other MCMC employees? Patients? Friends or family members?
- Is this gift being offered to me because my job at MCMC might influence a decision in favor of the donor?

*If you answered **Yes** to any of the above questions, the gift likely does not meet MCMC's ethical standards, this code or legal requirements and should not be accepted. Contact your corporate compliance officer for questions on gifts.*



Referrals

Two overarching principles govern our interactions with physicians:

- **We do not pay for referrals.** We accept patient referrals and admissions based solely on the patient's medical needs and our ability to render the needed services. We do not pay or offer to pay anyone — employees, physicians, or other persons or entities — for referral of patients.
- **We do not accept payments for referrals we make.** No MCMC employee or any other person acting on behalf of the organization is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another healthcare provider, we do not take into account the volume or value of referrals that the provider has made (or may make) to us.

Federal and state Anti-Kickback Statute and federal Stark Law apply to relationships between hospitals and physicians. Any arrangement with a physician must be structured to ensure compliance with legal requirements, our policies and procedures and with any operational guidance that has been issued. Most arrangements must be in writing and approved by the chief compliance officer. Failure to meet all requirements of these laws and regulations can result in serious consequences for our organization. *For further guidance see the "Anti-kickback Compliance Policy."*

Financial Reporting and Records

We seek to comply with all related auditing, accounting and financial disclosure laws, including but not limited to the Securities Exchange Act of 1934 and the Sarbanes-Oxley Act of 2002 and certain requirements imposed by the New York Stock Exchange. Senior financial officers receive training and guidance regarding auditing, accounting and financial disclosure relevant to their job responsibilities. They are also provided the opportunity to discuss issues of concern with the board of trustees.

The False Claims Act and Fraud, Waste and Abuse

The services provided by MCMC are governed by a variety of federal and state laws and regulations. These laws and regulations cover subjects such as false claims, illegal patient referrals, providing medically unnecessary services, violations of Medicare's Conditions of Participation and submitting inaccurate cost reports. MCMC is committed to full compliance with these laws and regulations.

MCMC expects all workforce members who create and submit claims for payment to Medicare, Medicaid and all other payers to ensure the submitted claims are accurate, complete and represent the true services actually provided by MCMC. This pertains to each department who enters procedure charges, codes, or bills. MCMC monitors charge entry, billing, coding and cost reporting to detect errors and inaccuracies. *For further guidance see the "Federal False Claims Act Policy."*

Review the Guiding Principles for Charges, Coding and Billing:

- Charges will be submitted only for services or supplies that are provided to the patient.
- Charges will accurately represent the level of service provided to the patient.
- Only those services that are medically necessary and are supported by valid orders and documentation will be submitted for payment to Medicare, Medicaid and all other payers.
- Under no circumstance will charges or codes be purposely selected to improperly increase the level of payment received.
- Overpayments will be reported and refunded as required by law.
- Cost reports will be accurate and filed in a timely manner.
- For Coding Questions please contact the coding supervisor.

Antitrust

Antitrust laws preserve and protect competition in goods and services. Antitrust violations are serious and may result in criminal charges, sizeable fines and imprisonment. MCMC will not engage in conduct that is illegal under antitrust laws. Examples of actions illegal by the laws include:

1. Agreements to fix prices, bid rigging, collusion (including price sharing) with competitors;
2. Boycotts, certain exclusive dealing and price discrimination agreements; and
3. Unfair trade practices including bribery, misappropriation of trade secrets, deception, intimidation and similar unfair practices.

Government Relations and Political Activities

As a tax-exempt organization, MCMC workforce members comply with all federal, state and local laws governing participation in government relations and political activities.

MCMC will not get involved in any political campaign for or against a candidate for public office. As employees of MCMC we may not engage in political activities on company time, but may do so on our own time. While doing so, it is important MCMC employees not give the impression they are speaking on behalf of or representing MCMC in these activities. Employees cannot seek to be paid by MCMC for any personal contributions for such purposes. Employees may not use MCMC's email system to support political activities. *If anyone has questions about political activities please contact the corporate compliance department.*

Contact by Government Investigators or Auditors

MCMC is committed to cooperate fully with reasonable requests from any governmental agencies concerning our operations and to respond appropriately to and not interfere with, any lawful government inquiry, audit, or investigation.

Any MCMC employee who receives a request for an interview by a government investigator is under no obligation to do so, but is free to do so. You have the right to consult with legal counsel and to have legal counsel present during the interview. Anything you say can be used against you in a criminal prosecution or in a civil enforcement proceeding. No employee of MCMC should ever destroy or alter records requested for government investigation or audit, lie or make misleading statements to a government agent, pressure anyone to hide information from, or provide false information to Government agents. *For further guidance see the "Responding to Government Investigations, Search Warrants and Subpoenas Policy."*

If you are contacted by a government investigator with a request for information, please follow these steps:

1. If contacted in person, ask the investigator for identification and note the name, title and office location.
2. If contacted by telephone, ask for and note the name, title, office location and a return phone number for the caller.
3. Contact your supervisor and the corporate compliance officer as soon as possible.
4. A MCMC employee who receives a request or search warrant from a government investigator should immediately notify the office of vice president and the office of performance and quality.

Accreditation and Surveys

From time-to-time, government agencies and other entities conduct surveys in our facilities. We are expected to respond with openness and accurate information. In preparation for or during a survey or inspection, MCMC workforce members must never conceal, destroy, or alter any documents; lie; or make misleading statements to the agency representative. Employees also must never attempt to cause another employee to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law.

Anyone aware of violations or suspected violations of truthful and factual representations and responses to survey agencies must report them immediately through the chain of command or to our corporate compliance officer. *For further guidance please see the "Un-announced Regulatory Survey Policy."*

Research and Clinical Trials

MCMC follows the highest ethical standards in full compliance with federal and state laws and regulations that govern any research and/or clinical trials conducted by our physicians and professional staff. We do not allow research misconduct, which includes activities such as:

- making up or changing results,
- copying results from other studies without performing the clinical investigation or research,
- failing to identify and deal properly with investigator or institutional conflicts of interest and
- proceeding without institutional review board (IRB) approval.

Our hospitals' first priority is always to protect the patients and human subjects and respect their rights during research and clinical trials.

Any MCMC facility or employee applying for or performing research of any type must follow all applicable research guidelines, privacy policies and maintain the highest standards of ethics and accuracy in any written or oral communications regarding the research project. Any MCMC facility or employee engaging in human subject research must do so in conjunction with IRB approval and consistent with company policies regarding human subject research and IRBs. *For further guidance please see the "Human Research Guidelines Policy."*

Business and Financial Information

We value efficient use of resources through partnerships and strategic alliance that provide financial strength, high quality care and services.

Accuracy, Retention and Disposal of Documents and Records

Each MCMC employee is responsible for the integrity and accuracy of our documents and records. No one may alter or forge information on any record or document. Records which may be relevant to a government investigation must never be destroyed.

Documents and records are retained in accordance with the law and our record retention policy. Medical and business documents include: paper such as letters and memos, computer-based information such as e-mail or computer files and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records only according to our policy. MCMC employees must not tamper with records. Finally, under no circumstances may an MCMC employee use patient, employee or any other individual's or entity's information for personal benefit (e.g., insider trading or marketing of the data). *For further guidance please see the "Record Retention and Destruction Policy".*

Confidential Information

The term "confidential information" refers to privately owned information about our organization's strategies and operations as well as patient information and third party information. Improper use or disclosure of confidential information could violate legal and ethical obligations. MCMC employees may use confidential information only to perform their job responsibilities. Each of us is responsible to not share this information with others unless the individual or business have a valid need to know the information in order to perform their job duties or carry out a business relationship. Confidential information also referred to as "sensitive information," covers virtually anything related to MCMC's operations that are not publicly known.

Use of due care and due diligence is required to maintain the confidentiality, availability and integrity of information MCMC owns or of which it oversees. Because so much of our clinical and business information is generated and contained within our computer systems, it is essential that each MCMC employee protect our computer systems and the information contained in them by not sharing passwords and by reviewing and adhering to our information security policies and standards. *For further guidance please see the "Information Management Plan."*

MCMC employees must protect sensitive information when it is e-mailed outside the organization or otherwise stored, posted, or sent through the Internet; stored on portable devices such as laptops, tablets and mobile phones; or transferred to removable media such as CDs or USB drives.

MCMC employees must be extremely careful in the use of social media, to not disclose patient or other sensitive information whether at work or at home. Any MCMC employee who knows or suspects confidential information to have been compromised must report the potential security breach by completing an ORS on the MCMC connections intranet page. *For further guidance please see the "Reporting and Processing Feedback from Social Media Policy."*

If our employment or contractual relationship with MCMC ends for any reason, we are still bound to maintain the confidentiality of information viewed, received or used during the employment or contractual business relationship with MCMC. This provision does not restrict the right of each of us to disclose, if we wish, information about our own compensation, benefits, or terms and conditions of employment. Copies of confidential information in an employee's or contractor's possession shall be left with MCMC at the end of the employment or contractual relationship. *For further guidance please see the "Termination Policy."*

Let's review what "sensitive" information is:

- Personnel data maintained by the organization;
- Patient lists and clinical information, including individually identifiable patient information and clinical quality data;
- Patient financial information, including credit card data and social security numbers;
- Passwords;
- Pricing and cost data;
- information pertaining to acquisitions, divestitures, affiliations and mergers;
- Financial data;
- Details regarding federal, state and local tax examinations of the organization or its business partners;
- Proprietary information from a research sponsor or the data generated from the research;
- Strategic plans;
- Marketing strategies and techniques;
- Supplier and subcontractor information; and
- Proprietary computer software.
- Sensitive data may also include photos and videos.

Electronic Media

All communications systems, including but not limited to computers, electronic mail, intranet, internet access, organization provided telephones and voice mail, are the property of MCMC and are to be used primarily for business purposes. Limited reasonable personal use of MCMC communications systems is permitted; however, users should assume these communications are not private. Users of computer and facility telephone systems should not expect privacy of anything they create, store, send, or receive on the computer and telephone systems and MCMC reserves the right to monitor and/or access communications usage and content consistent with MCMC policies and procedures.

Employees may not use MCMC devices or MCMC-provided communication channels or access the Internet or social media to view, post, store, transmit, download, or distribute any:

- Threatening materials;
- Knowingly, recklessly, or maliciously false material;
- Obscene materials;
- Anything constituting or encouraging a criminal offense, giving rise to civil liability, or otherwise violating any laws.

- These channels of communication may not be used to send chain letters, personal broadcast messages, photos or videos, or copyrighted documents that are not authorized for reproduction.

Employees who abuse our communications systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action.

We are all expected to follow MCMC's information security policies and standards governing the use of information systems. Individuals may only use user IDs assigned to them individually and are not permitted to share or disclose any user account that is used to access MCMC systems or information. Employees shall never use tools or techniques to break or exploit MCMC information security measures or those used by other companies or individuals. *For further guidance please see the "Computer Systems Security Policy."*

Relationships with Subcontractors and Suppliers

MCMC is a partner of the Health Future purchasing program. On behalf of its member entities, including MCMC, Health Future negotiates contracts with supply and service vendors. The Health Future purchasing program participates in the MedAssets purchasing group.

Those seeking to be suppliers of MCMC should understand that virtually all of the system-wide procurement effort is executed, in effect, by the Health Future purchasing program or MedAssets. We encourage those with new technologies or product innovations to be certain that MCMC fully understands their capabilities.

We will manage our consulting, subcontractor and supplier relationships in a fair and reasonable manner, free from conflicts of interest and consistent with all applicable laws and good business practices. We promote competitive procurement to the maximum extent practicable. Our selection of consultants, subcontractors, suppliers and vendors will be made on the basis of objective criteria including quality, technical excellence, price and delivery, adherence to schedules, service and maintenance of adequate sources of supply.

Our purchasing decisions will be made on the supplier's ability to meet our needs and not on personal relationships and friendships. We employ the highest ethical standards in business practices in source selection, negotiation, determination of contract awards and the administration of all purchasing activities.

We comply with contractual obligations not to disclose vendor confidential information unless permitted under the contract or otherwise authorized by the vendor.

