

CODE OF CONDUCT POLICY

Adventist Health's Guide to Compliance and Ethics



Being Adventist Health

Be Love

Love matters. Treat yourself with love and care so that you are free to love and care for others. Be trustworthy, forgive freely and find common ground.



Be a Force for Good

Be courageous. Take action. Whether it is through your position or your passion, work to impact your community for the better.

Be a Mission Owner

Own your role, find your talent and know that your contribution is mission critical. Ask yourself, "How do I inspire health, wholeness and hope?"



Be Welcoming

Recognize all people are created equal and embrace them in hospitality as you would a cherished friend.



Be Curious

Seek to understand how things work and why. Innovate and be open to new ideas and approaches. Own your mistakes and learn from them.

Be Brilliant

Leverage your best talents and skills to shine. Make promises and keep them. Always expect the same from others.



Adventist Health's Mission

Living God's love by inspiring health,
wholeness and hope.

Table of Contents

A Message From Our CEO	1
Being Adventist Health Values	2
Definitions	3
Adventist Health Compliance And Ethics Program Overview	4
Adventist Health Code of Conduct Policy	5
Ethical Conduct	7
Financial Responsibility	9
Compliance With Laws and Regulations	10
Fraud and Abuse	15
Antitrust and Trade Regulations	17
Workplace Considerations	19
Auditing And Monitoring, Inquiries, Reporting Violations, Investigations, Corrective Actions	21
Conclusion	22
Acknowledgment	23
Question & Answers Appendix	23

A Message From Our CEO

Dear Adventist Health colleague,

I want to thank you for taking the time to review Adventist Health's new Code of Conduct Policy. As you read through this handbook, which covers our compliance and ethics program and standards of conduct, keep in mind your role as an associate regarding patient rights, privacy, ethical conduct, fiscal responsibility and laws and regulations.

Our Code of Conduct Policy aligns with our mission of Living God's Love by inspiring health, wholeness and hope. The policy also supports our guiding principles to: Be Love, Be a Force for Good, Be a Mission Owner, Be Welcoming, Be Curious, and Be Brilliant. It is our truth and we must hold each other accountable for living with integrity.

If you believe you may have witnessed a potential or suspected violation of Adventist Health's Code of Conduct Policy, Adventist Health policy or applicable laws or regulations, please contact your supervisor. If you are not comfortable speaking to your supervisor, you can speak to your Human Performance representative or local compliance officer, the regional compliance official or call the Adventist Health compliance and privacy hotline at 1-888-366-3833.

Retaliation against any associate who, in good faith, reports potential or suspected violations will not be tolerated.

I appreciate your commitment to our mission and for taking the time to review the Adventist Health's Code of Conduct Policy.

Thank you,

Scott Reiner, CEO

Adventist Health's Mission

Living God's love by inspiring health, wholeness and hope.

Being Adventist Health Values

Be Love

Love matters. Treat yourself with love and care so that you are free to love and care for others. Be trustworthy, forgive freely and find common ground.

Be A Force For Good

Be courageous. Take action. Whether it is through your position or your passion, work to impact your community for the better.

Be A Mission Owner

Own your role, find your talent and know that your contribution is mission critical. Ask yourself, "How do I inspire health, wholeness and hope?"

Be Welcoming

Recognize all people are created equal and embrace them in hospitality as you would a cherished friend.

Be Curious

Seek to understand how things work and why. Innovate and be open to new ideas and approaches. Own your mistakes and learn from them.

Be Brilliant

Leverage your best talents and skills to shine. Make promises and keep them. Always expect the same from others.

Definitions

The following definitions are used in this Code of Conduct Policy:

Adventist Health includes Adventist Health Corporate and each of its subsidiaries and affiliates, operating or business units, facilities, including all departments, services and clinics maintained and/or supported under a facility's general acute care hospital or other health facility license, and affiliated medical group practices, as applicable.

Adventist Health Corporate means Adventist Health System/West, a California nonprofit religious corporation.

Adventist Health Corporate Compliance and Privacy Executive is an Adventist Health senior leader who oversees the system-wide Adventist Health Compliance and Ethics Program.

Associate(s) means all individuals employed, or otherwise retained by Adventist Health either full-time or part-time, including per diem, temporary, casual, contract labor and volunteers, including executives.

Board refers to the Adventist Health Corporate board of directors.

Compliance and Ethics Program refers to Adventist Health activities designed to promote ethical conduct and adherence to the laws, including, but not limited to:

- Designating compliance officers and committees;
- Drafting Adventist Health compliance policies and standards of conduct, including this "Code of Conduct Policy;"
- Developing and providing effective Associate compliance training and education;
- Conducting internal auditing and monitoring programs and activities;
- Developing and supporting effective lines of communications, including, but not limited to, the "Adventist Health Compliance and Privacy Hotline;"
- Publicizing disciplinary guidelines; and
- Responding promptly to compliance offenses, conducting compliance investigations, and applying corrective and/or disciplinary action, if necessary.

Local Compliance Official is an Associate whose job assignment includes the responsibility and accountability for communicating, monitoring and evaluating implementation of the Adventist Health Compliance and Ethics Program in the local business unit or facility.

Regional Compliance Official is an Associate who reports directly to the Adventist Health Corporate Compliance and Privacy Executive. He/she assists in communicating the Adventist Health Compliance and Ethics Program and monitors compliance along with overseeing compliance and privacy initiatives in Adventist Health regions.

Adventist Health

Compliance And Ethics Program Overview

Adventist Health is committed to compliance with all applicable laws and standards of conduct. Established in 1996, the Compliance and Ethics Program is intended to ensure compliance with these laws and standards as well as to provide Associates with meaningful guidance regarding their legal and ethical responsibilities in many business contexts.

The Compliance and Ethics Program is managed by the Adventist Health Corporate Compliance and Privacy Department in Roseville, California. The Adventist Health Corporate Compliance and Privacy Executive reports to the Adventist Health Corporate Chief Executive Officer and has direct access to the Board through the Board Risk/Compliance Committee. The chairperson of the Board Risk/Compliance Committee reports all of its oversight activities relating to risk and compliance to the full Board. Regional Compliance Officials report directly to the Adventist Health Corporate Compliance and Privacy Executive. Regional Compliance Officials assist in communicating the Adventist Health Compliance and Ethics Program and monitor and oversee compliance and privacy initiatives in Adventist Health regions as part of the Adventist Health Corporate Compliance and Privacy Department. In addition, each Adventist Health facility has a designated Local Compliance Official, a HIPAA Privacy Official, an Information Technology (IT) Security Official and an IT Security Privacy Official, who are responsible for compliance and HIPAA Privacy oversight at the local level. *Your Local Compliance Official is available to answer questions about the Code or the Compliance and Ethics Program and receive and investigate reports of potential or suspected violations.*

The Corporate Compliance and Privacy Department's responsibilities include (1) the management of the Compliance and Ethics Program, (2) reporting on operations, (3) investigating reported violations, and (4) monitoring and auditing activities to evaluate the effectiveness of compliance activities. The primary focus is to establish and integrate separate policies and procedures that will help Adventist Health abide by all applicable laws and standards, while recognizing there are many regulations that impact the delivery of healthcare services that are managed by other departments within Adventist Health. For example, there are many regulatory matters that do not fall directly under the Corporate Compliance and Privacy Department's responsibilities. The following individuals are responsible for other significant risk areas within Adventist Health:

Director, Information Security / ISO: manages ePHI security issues through the Incident Response Process by the Adventist Health Enterprise Technology Department's Information Security Team;

Director, Accreditation, Regulatory, and Licensing: provides leadership and oversight of regulatory matters affecting patient safety and facility licensing and accreditation;

Chief Clinical Official, Care Delivery Administration: oversees clinical effectiveness and quality of care;

General Counsel: provides leadership to the Office of General Counsel (OGC). The Corporate Compliance and Privacy Department works closely with the OGC on compliance related matters;

Human Performance Executive: oversees Adventist Health Human Performance matters;

Strategy and Communication Executive, Marketing & Communication Department: provides oversight to communications and Adventist Health social media sites; and

System Chief Quality Officer, Care Delivery Administration: provides direction on engagement and accountability in the culture of safety, identification of existing safety opportunities with a plan for accelerated improvement, and a best practice clinical risk program.

The Adventist Health Compliance and Ethics Program incorporates the Code as well as other Adventist Health policies, such as those governing Associate grievance procedures, accounting, auditing, etc. Associates also should review the Adventist Health Employee Handbook to ensure their understanding of Adventist Health's expectations regarding a number of additional ethics and compliance-related measures, such as the handling of conflicts, prohibitions on harassment and discrimination, protection of confidential information, use of Adventist Health electronic and communications equipment/systems and software, and use of social media.



Adventist Health Code of Conduct Policy

This Adventist Health Code of Conduct Policy (Code) sets forth Adventist Health's guiding principles that our work is performed in an ethical and legal manner. These obligations apply to our relationships with patients, doctors, clients, independent contractors, vendors, regulators, consultants, and one another. The Code's emphasis is based on our shared values, which guide and dictate appropriate conduct while performing services for Adventist Health. It is also a key component of our overall Corporate Ethics and Compliance Program.

Adventist Health is committed to the ideals which are reflected in our Mission, Vision and the values associated with "Being Adventist Health," the Code, and our policies and procedures. Adventist Health is also committed to abiding by all applicable laws, statutes and regulations when we do business. We are equally committed to assuring that our actions consistently reflect our words. In this spirit, we expect all our Associates' actions to reflect the high standards set forth in the Code.

No code of conduct policy can substitute for an individual's own internal sense of fairness, honesty and integrity. Thus, in your daily life and work, if you encounter a situation or are considering a course of action that may be technically within the guidelines of the Code and Adventist Health's policies and procedures, but you are concerned that the contemplated action simply "does not feel right," please discuss the situation with your Local Compliance Official.

Adventist Health prohibits all retaliation. There will be no retaliation for asking questions, or raising concerns about the Code, or for reporting possible improper conduct or violations. Adventist Health trusts you as a valuable member of the Adventist Health team. We ask you to assist us in supporting the values and principles that are critical to achieving our mission.

The Code addresses five categories of issues that are critical to the success of Adventist Health: ethical conduct, financial responsibility, compliance with laws and regulations, workplace considerations, and auditing and monitoring of the foregoing. The standards are not intended to be an exhaustive list of issues facing Adventist Health, but instead, are those that are frequently encountered.

Ethical Conduct

Guiding Principles

Adventist Health is committed to the highest standards of business ethics and integrity. Associates must represent Adventist Health accurately and honestly; deal fairly with Adventist Health's competitors, customers and vendors; treat one another with dignity, respect, and courtesy; and refrain from any false or misleading statements or any activity intended to defraud anyone of money, property or services.

Expectations of the Chief Executive Officer, Chief Financial Officer, and Senior Leaders

Adventist Health's senior leadership is responsible for maintaining a culture that supports the Code. Additionally, all provisions of the Code and Employee Handbook, including those related to ethical conduct, conflicts of interest, compliance with the law, and internal reporting of violations of the Code, bind the CEO and Senior Financial Officer. The CEO and Senior Financial Officer also have the responsibility for full, fair, accurate, timely, and understandable disclosure in the periodic reports and submissions filed by Adventist Health with the designated Medicare Administrative Contractors, Centers for Medicare & Medicaid Services, various federal and state agencies, the Internal Revenue Service, the Office of Statewide Planning Health and Development, and the Joint Commission, as well as in other public communications made by Adventist Health. Accordingly, it is the responsibility of the CEO and each senior leader to promptly bring to the attention of the Local Compliance Official any information that materially affects the disclosures made by Adventist Health in its public communications. The CEO and Senior Financial Officer also shall bring promptly to the attention of the Local Compliance Official any information he/she may have concerning significant deficiencies in the design or operation of internal controls that could adversely affect Adventist Health's ability to record, process, summarize, and report financial data; or any fraud, whether or not material, that involves management or other Adventist Health staff who have a significant role in Adventist Health's financial reporting, disclosures, or internal controls.

Expectations of Adventist Health Leaders

While all Associates are obligated to follow the Code, we expect our leaders to set an example and be role models. We expect everyone in the organization with supervisory responsibility to exercise that responsibility in a kind, sensitive, thoughtful and respectful manner. We also expect that leaders will ensure their teams have sufficient information to comply with laws, regulations and Adventist Health policies and standards of conduct, as well as the resources to resolve ethical dilemmas. Leaders must support a culture that promotes the highest standards of conduct, ethics and compliance. This culture must encourage

everyone in the organization to share concerns immediately. Adventist Health expects that its leaders will:

- Use care in screening potential Associates and act professionally and lawfully in supervising existing Associates;
- Take reasonable steps to ensure that Associates are familiar with the Compliance and Ethics Program;
- Train and educate Associates adequately to comply with the requirements contained in the Code and comply with applicable laws and regulations, Adventist Health policies, standards of conduct and/or compliance directives;
- Maintain a work environment in which Associates feel free to ask questions and/or report concerns about potential or suspected issues without fear of retaliation;
- Conduct periodic reviews to maintain the highest quality job competency and ethical conduct;
- Promptly report any potential or suspected violation of the Code or any Adventist Health policies, standards of conduct or applicable laws and regulations; and
- Set a proper example for Associates to follow.

Expectations of Associates

Fulfillment of Adventist Health's commitment to the Code is dependent upon the commitment of each Associate. Adventist Health does not exist separately from its Associates and can only function through its Associates. Each member of the Board is committed to the Code and the Compliance and Ethics Program. It is expected that every Associate will adhere to the Code, and the Compliance and Ethics Program as well, by:

- Taking responsibility for his/her own actions;
- Knowing and complying with applicable laws and rules, including applicable Federal healthcare program requirements, the Code and Adventist Health policies and standards of conduct as they apply to his/her job responsibilities;
- Seeking guidance, as provided in the Code, and/or researching other applicable Adventist Health policies and standards of conduct when in doubt about his/her responsibilities;
- Refraining from involvement in illegal, unethical or other improper acts;
- Promptly reporting any potential or suspected violation of the Code, Adventist Health policies, standards of conduct or applicable laws or regulations; and
- When requested, assisting Adventist Health personnel and authorized outside personnel in investigating all allegations of violations.

Financial Responsibility

Adventist Health maintains a high standard of accuracy and completeness in documenting, managing and reporting financial information. This information serves as a basis for managing our business and is important in meeting our obligations to patients, staff, suppliers, and others. It is also necessary for compliance with tax and financial reporting obligations.

Adventist Health's books and records must not contain any false, misleading or deceptive information or entries. Financial reports must fairly and consistently reflect Adventist Health's performance and accurately disclose the results of operations. As appropriate, they must also comply with generally accepted accounting principles and other applicable rules and guidelines and provide a sufficient platform on which to complete cost reports and requests for payment for services provided to beneficiaries of federal and state healthcare programs such as Medicare, Medicaid/Medi-Cal and TRICARE/CHAMPUS. Each Associate, who has a role in documenting, managing and/or reporting financial information for Adventist Health, has a personal responsibility to ensure that every document and entry is complete and accurate, and that requests for reimbursement or payments are supported by receipts, purchase orders or other documentation as required by Adventist Health financial policies.

Internal controls exist in virtually every aspect of our work and all Associates share responsibility for maintaining and complying with required internal controls. Moreover, in fulfilling their financial reporting obligations, Associates must disclose all material facts related to a matter being reported, including any material fact that is necessary to ensure the report is not false or misleading. Associates must cooperate in all audits, and may not try to influence, coerce, manipulate, or mislead any person or entity engaged to perform the audit with the intent of affecting the outcome of the audit.



Compliance With Laws and Regulations

Adventist Health complies with all laws and regulations affecting its business. Associates are expected to have a practical, working knowledge of the laws and regulations affecting their job responsibilities. Adventist Health requires annual compliance training and provides supplemental educational materials to help inform Associates of these laws and regulations. Associates may direct questions to the Office of General Counsel or the Corporate Compliance and Privacy Department.

Section 501(c)(3) Requirements

As a Section 501(c)(3) organization, Adventist Health must engage in activities that advance its tax-exempt purposes and ensure that its resources are not focused on advancing the private or personal interests of any individual. Consequently, Adventist Health strives to ensure that all payments, including compensation arrangements, do not exceed fair market value. Adventist Health seeks to comply with the rebuttable presumption of reasonableness established under the Treasury Regulations accompanying Section 4958 of the Internal Revenue Code of 1986, as amended, and it expects that all Associates will facilitate Adventist Health's compliance with the relevant requirements.

Patient Rights: Appropriate Care and Treatment

Care is provided in an efficient manner, consistent with our obligation to maintain quality. Patients are entitled to disclosure of charges.

- Patients are informed of their right to self-determination. This right respects the competent adult patient's right to participate in and make his/her own healthcare decisions after receiving his/her physician's complete disclosure of the nature and consequences of proposed healthcare, including significant benefits, risks and alternatives. A patient has the right to accept medical care or to refuse treatment, and to be informed of the medical consequences of such refusal. Also, additional patient rights apply for Medicare patients in long-term care facilities and home health agencies, including a requirement that patients be informed of their rights in a language they understand.

Patients are treated at all times with care, concern and respect. Patients are entitled to optimal care, prompt and courteous responses to their requests and to their particular needs for treatment or service.

- Medically necessary care is provided with the patient's informed consent.
- If a patient has been declared incompetent by a court, or is assessed by his/her primary care physician to lack the ability to understand the nature and consequences of proposed healthcare, including significant benefits, risks and alternatives, the patient's agent holding power of attorney for healthcare, surrogate decision maker,

conservator/guardian, next of kin or other legally authorized responsible person has an obligation to act in the best interests of the patient to the extent permitted by law.

- At discharge, Adventist Health facilities provide patients with information regarding the availability of any post-hospital services they may require, consistent with applicable laws, assuring patient choice is always appropriately maintained.

Patient Information

We are committed to ensuring confidentiality of records and related information for all patients. Patient privacy and confidentiality of care is respected at all times in accordance with Adventist Health policy (see Employee Handbook) and the Health Insurance Portability and Accountability Act (HIPAA) requirements. We do not use, disclose or discuss patient-specific information, including patient financial information, with others unless it is necessary to serve the patient, at the patient's request or required by law.

- Associates or Medical Staffs do not have a right to any patient information other than that which is necessary to perform his or her job or responsibilities. Any breach of confidentiality represents a failure to meet the professional and ethical standards expected and constitutes a violation of this Code. A full confidentiality statement is received and accepted by each Associate as part of the Adventist Health Employee Handbook. We also expect our vendors involved in patient care to perform and provide services consistent with the applicable HIPAA laws. We include HIPAA Business Associate language in our agreements with these vendors or separately enter into Business Associate Agreements with such vendors.

Adventist Health has a Privacy Manager and a team of individuals dedicated to ensuring HIPAA compliance. If you have specific questions about Adventist Health's HIPAA compliance status, please contact your local Privacy Official.

Emergency Services (EMTALA Policy)

Consistent with our commitment to the poor and underserved, any person regardless of his/her ability to pay is provided an appropriate medical screening examination within the capability of each Adventist Health hospital to determine whether an emergency medical condition (including psychiatric medical condition) exists or, for pregnant women, active labor exists and, if so, provide appropriate stabilizing treatment and/or appropriate transfer to other medical centers for treatment. In addition:

- Practices that fail to conform to this policy, commonly referred to as "dumping," are prohibited under both federal and state laws, and carry severe penalties for Adventist Health, its Associates and Medical Staffs.
- Associates must comply with Adventist Health policies on screening, stabilization and transfer of patients. At a minimum, a person presenting to an Adventist Health hospital is entitled to a medical screening examination in accordance with Medical Staff policies

to determine whether he or she has an emergency medical condition or, in the case of a pregnant woman, is in active labor, irrespective of ability to pay. If it is determined that a patient has an emergency medical condition, the patient must receive further medical evaluation and such treatment as may be required to stabilize the medical condition, within the capabilities of the Associate and facilities available, or the patient must be transferred in a medically appropriate manner to another medical facility.

Physician Relations

Adventist Health maintains proper, legal and positive working relationships between our Associates and physicians. Healthcare is a collaboration between Associates and Medical Staff members. As with any collaboration, each party has important roles and responsibilities. Adventist Health is committed to providing an excellent work environment for our Medical Staffs. Associates interact with Medical Staff in a respectful and supportive way. We require our Medical Staffs to be familiar with, and comply with, this Code.

Adventist Health is committed to providing a Medical Staff privileging process that uses uniformly applied professional criteria in a fair, prompt and reasonable manner, without discrimination on the basis of race, color, national origin, ancestry, sex, pregnancy, childbirth or related medical condition, marital status, religion, creed, physical/mental disability, medical condition, age, gender identity, sexual orientation or any other protected category as defined by law.

Anti-Kickback and Anti-Referral Laws

Federal and state laws and regulations govern the relationship between individuals and entities who may refer patients to Adventist Health facilities. The applicable federal laws include the Anti-Kickback Law and the Stark Law. The Office of General Counsel and the Corporate Compliance and Privacy Department have developed a comprehensive program to ensure compliance with such federal and state anti-kickback and anti-referral laws. Consistent with Adventist Health's strategic direction, the intent of the program is to provide standardization of physician contracting and consistency of legal interpretation, with the ultimate goal of providing an efficient framework to contract with physicians and engage with providers and suppliers in compliance with applicable laws.

Contracting with Physicians

It is important that Associates who interact with physicians (particularly those Associates who make payments to physicians for services rendered, provide space or services to physicians, recruit physicians to the community, and/or arrange for physicians to serve in leadership positions in the organization) are aware of the requirements of the laws, regulations, and policies that address relationships between Adventist Health and physicians. If relationships with physicians are properly structured, but not diligently administered, such failure to administer the arrangements, as agreed, results in a violation of the law. Any arrangement

with a physician must be structured to ensure compliance with legal requirements. Most arrangements must be in writing and approved by the Office of General Counsel. Failure to meet all requirements of these laws and regulations can result in serious consequences.

The Adventist Health policies and procedures governing physician contracts, and other payments to physicians, are found in the Adventist Health Physician Financial Arrangement Policy. These policies govern, among others, the following arrangements: medical directorships and other administrative services, professional services, emergency call coverage, managed care payments, facility and equipment leases, loans and lines of credit, physician recruitment, and other miscellaneous transactions.

- All agreements involving payments or other compensation between an Adventist Health entity and a physician are to be in writing and approved in advance by the Office of General Counsel.
- The following requirements must be met unless otherwise approved by the Office of General Counsel:
 - ◇ The written agreement is prepared by the Adventist Health Office of the General Counsel and signed by both the Adventist Health entity and physician before the arrangement commences.
 - ◇ The agreement identifies the correct legal name and tax payer I.D. number of the physician or medical group and payments may only be made to the specified party to the agreement.
 - ◇ Payment that is fair market value for the items or services rendered is set in advance for at least one year.
 - ◇ Services to be provided and paid for and/or the leased premises or equipment are clearly described in the agreement.
 - ◇ The agreement demonstrates that payment is not directly or indirectly based on the value or volume of referrals.
 - ◇ The agreement is prospective only.
 - ◇ Payment for physician services must have adequate supporting documentation to demonstrate that the services were performed.
 - ◇ Any renewal of an agreement that changes the compensation must be prospective.

The above list is a summary reference source only. The Adventist Health Physician Financial Arrangements Policy will be used in evaluating the adequacy of individual physician arrangements. Additional guidance is incorporated in the Physician Financial Arrangements Policy related to managed care arrangements, physician recruitment, and other matters relating to physician arrangements.

Referrals and Business Courtesies

In order to ensure compliance with federal and state anti-kickback and anti-referral laws, Adventist Health only accepts 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 (whether money, gifts or services) anyone—Associates, physicians, or other persons or entities—for the referral of patients or to induce the purchase of items and services. Likewise, Adventist Health does not accept payments for referrals. No Associate, or any other person acting on behalf of Adventist Health, is permitted to solicit or receive anything of value (including any money, gifts or services), directly or indirectly, in exchange for the referral of patients or the purchase of items or services. Similarly, when making patient referrals to another healthcare provider, we do not consider the volume or value of referrals that the provider has made to Adventist Health.

The fraud and abuse laws prohibit knowingly and willfully offering, paying, soliciting or receiving any money gifts, kickbacks, bribes, rebates or any other type of value, remuneration or services in return for the referral of patients or to induce the purchase, lease, or ordering of any item, good or service for which payment may be made by the federal or state government. Examples of violations include:

- Payment by Adventist Health of an incentive each time a patient is referred to Adventist Health;
- Provision or receipt by Adventist Health of free or significantly discounted billing, nursing care, rent or other Associate services;
- Provision or receipt by Adventist Health of free training in management techniques, coding and laboratory techniques;
- Payment by Adventist Health for services in excess of their fair market value;
- Forgiveness of indebtedness to Adventist Health absent a charitable or risk management purpose; and,
- Preferential treatment of or by Adventist Health in any form to obtain business.

We also do not extend business courtesies and/or tokens of appreciation to potential referral sources, outside of Adventist Health policies. Any entertainment, gift or token of appreciation involving physicians, or other persons who are in a position to refer patients to Adventist Health, must be undertaken in accordance with Adventist Health policies, including the Business Relationships Policy. Associates must consult Adventist Health policies or our Corporate Compliance Department prior to extending any business courtesy or token of appreciation to a potential referral source.

Fraud and Abuse

Fraud Waste and Abuse Policy

Adventist Health prides itself on the integrity of Adventist Health, its Associates, and its Medical Staffs and other healthcare providers. Thus, it is the policy of Adventist Health to detect and report any and all types of fraudulent or abusive activity, including insurance fraud and criminal conduct in all forms practiced by healthcare providers, contractors, contract laboratories, Associates, clients, agents and patients. Further, it is Adventist Health's policy to consistently and fully comply with all laws and regulations pertaining to the delivery of, and billing for, services which apply to Adventist Health on account of its participation in Medicare, Medicaid/Medi-Cal, TRICARE/CHAMPUS and other federal and state healthcare programs, and to fully cooperate with law enforcement and regulatory bodies. All Associates must comply with the terms and reporting requirements of the Fraud Waste and Abuse Policy as set forth in the Employee Handbook.

False Claims Act Policy

The Federal False Claims Act provides in part that it is illegal for any person or entity to knowingly present, or cause to be presented, a false or fraudulent claim for payment or approval, or knowingly making or using, or causing to be made or use, a false record; or conspire to defraud the federal or state government to obtain payment for a false or fraudulent claim paid or approved. All Associates must comply with the terms of the False Claims Act Policy as set forth in the Employee Handbook.

Compliance Responsibility

Violation of federal and state laws concerning fraud and abuse and false claims can result in significant criminal and civil penalties for Adventist Health and its Associates, including imprisonment, fines, penalties and damages. Associates must be vigilant in avoiding any conduct that could violate or even appear to violate these laws.

Prohibited activities include, but are not limited to, the following:

- Billing for supplies or services not delivered;
- Misrepresenting services actually provided. Such misrepresentation includes, but is not limited, to assigning a code for a more complicated procedure than actually performed (upcoding), or by dividing a procedure or service typically billed as one procedure into multiple parts in order to increase reimbursement (unbundling);
- Duplicate billing for services rendered;
- Falsely certifying that services were medically necessary;

- Falsely certifying that an individual meets the Medicare requirements for home health (or any other) services;
- Seeking to collect amounts exceeding the co-payment and deductible from a Medicare or Medicaid beneficiary who has assigned his or her rights to benefits;
- Permitting an Associate, provider or supplier who has been excluded from any Federal or state healthcare programs to prescribe, provide or oversee the delivery of goods or services to the beneficiaries of such programs;
- Offering or transferring money, gifts, services or other items of value to a patient or prospective patient to influence him or her to order or receive services or items from Adventist Health.



Antitrust and Trade Regulations

Antitrust Policy

It is Adventist Health's policy to comply with all applicable laws governing its operations, including antitrust laws and trade regulations, and to conduct its affairs in keeping with the highest moral, legal and ethical standards. It is our belief that the adoption and compliance with Adventist Health's Antitrust Policy will help promote an environment in which Adventist Health continues to compete vigorously while fostering the delivery of the highest quality of healthcare and limit our exposure to legal liability. All Associates must comply with the terms of the Antitrust and Fair Business Practices Policies as set forth in the Employee Handbook.

Adventist Health avoids activities that illegally reduce or eliminate competition, control prices, allocate markets or exclude competitors.

- The purpose of the antitrust and trade regulation laws is to protect the public, Adventist Health and other companies from unfair trade practices. These laws promote competition and preserve the free enterprise system. Associates are expected to strictly comply with all applicable federal and state antitrust laws and regulations.
- Because antitrust matters can only be analyzed on a very fact-specific basis, the Office of General Counsel must be consulted in advance on each occasion where collective activity or decision making will occur that may involve antitrust issues.

Antitrust Rules – General Business

- Do not engage in price fixing, bid rigging or allocation of customers or markets.
- Price fixing is an agreement between organizations about the prices one or both will charge others for goods or services.
- Bid rigging is an agreement between organizations about who will bid.
- Customer allocation is an agreement between organizations or individuals to divide customers, patients, or other business among themselves.
- Do not discuss with any competitor: prices, terms or conditions of sale; where Adventist Health intends to sell or bid; to whom Adventist Health intends to sell or bid; or whether, or at what price, Adventist Health intends to sell or bid.
- If any representative of a competitor attempts to discuss any of these subjects with you, terminate the conversation immediately and report it to your manager.
- Do not engage in activities such as bribery, stealing, improperly using competitor trade secrets, deceptive or similar unfair practices, or intimidating or threatening customers or suppliers.

Ineligible Persons

We do not contract with, employ, or bill for services rendered by any individual or entity: (1) that is excluded or ineligible to participate in federal healthcare programs; (2) that was suspended or debarred from federal government contracts and not reinstated in a federal healthcare program after a period of exclusion, suspension, debarment, or ineligibility; or (3) has been convicted of a criminal offense that falls within the scope of 42 U.S.C. 1320a-7(a), but has not yet been excluded, debarred, suspended or otherwise declared ineligible (each, an “Ineligible Person”). Upon hire, we search the Department of Health and Human Services’ Office of Inspector General, Exclusive Parties List System (EPLS) and General Services Administration’s lists for such Ineligible Persons.

License and Certification Renewal

Associates, individuals retained as independent contractors, and privileged practitioners in positions which require professional licenses, certifications, and/or registration (LCR) or other credentials are responsible for maintaining current LCR or credentials and shall comply at all times with federal and state requirements applicable to their respective disciplines. Adventist Health does not allow any Associate member, independent contractor or privileged practitioner to work without valid, current LCR. All Associates must comply with the terms of the License, Certificate, and Registration Policy as set forth in the Employee Handbook.

Accreditation and Surveys

From time to time, government agencies and other entities conduct surveys at Adventist Health. Accreditation or external agency surveys are extremely significant and broader than the scope of this Code. All Associates must comply with the terms of the Regulatory Compliance and Regulators’ Policy as set forth in the Employee Handbook.



Workplace Considerations

Diversity, Equal Employment Opportunity, and Harassment and Disruptive Behavior

Adventist Health actively promotes diversity in its workforce at all levels of the organization. We are committed to providing an inclusive work environment where everyone is treated with fairness, dignity and respect. We are accountable to each other for the manner in which we treat one another and for the manner in which people around us are treated. We are committed to recruiting and retaining a diverse staff that is reflective of the patients and community we serve. We regard laws, regulations, and policies relating to diversity as a minimum standard. We strive to create and maintain a setting in which we celebrate cultural and other differences and consider them strengths.

Adventist Health maintains an equal opportunity workforce in accordance with its Equal Employment Opportunities Policy as set forth in the Employee Handbook.

Adventist Health seeks to provide a work environment that is free of all forms of discriminatory harassment, including sexual harassment and disruptive behavior, and all Associates must comply with the terms of its Anti-Harassment Policy as set forth in the Employee Handbook.

Health and Safety

Adventist Health strives to offer a safe and healthy working environment. Our policies and practices are designed to protect our Associates from potential workplace hazards. Associates need to be familiar with these policies and how they apply to their specific job responsibilities. Each Associate should seek advice from his or her supervisor, or the local Safety Official, whenever he/she has a question or concern. It is important that each Associate immediately advise a supervisor or the Safety Official of any serious workplace injury or any situation presenting a danger of injury. Immediate notification allows for timely corrective actions. Safety compliance includes, but is not limited to, the following:

- Associates shall conduct themselves in a manner that minimizes potential health and safety hazards and notify their supervisors promptly of any actual or potential unsafe working conditions or practices.
- Associates must properly generate, store and dispose of medical, chemical and other waste in accordance with applicable laws and Adventist Health's environmental policies designed to protect human health, the environment and the surrounding community.
- Associates who are authorized to operate incinerators, sterilizers and underground storage tanks (containing fuels for emergency generators) are adequately trained to operate such devices pursuant to all permits, regulations and applicable procedures.

Environmental Compliance

It is Adventist Health's policy to comply with all environmental laws and regulations as they relate to its operations. We act to preserve our natural resources to the full extent reasonably possible. Adventist Health operates its facilities with the necessary permits, approvals and controls. We diligently employ the proper procedures to provide a good environment of care and to prevent pollution.

In helping Adventist Health to comply with these laws and regulations, all Associates must understand how job duties may impact the environment. Associates must adhere to all requirements for the proper handling of hazardous material, and immediately alert supervisors to any situation regarding the discharge of a hazardous substance, improper disposal of hazardous and medical waste, or any situation that may be potentially damaging to the environment.



Auditing And Monitoring, Inquiries, Reporting Violations, Investigations, Corrective Actions

Adventist Health is committed to regularly evaluating the effectiveness of its Compliance and Ethics Program through routine internal auditing and monitoring of compliance with the Code and issues that may have regulatory or compliance implications. The Adventist Health Compliance and Privacy Department conducts regular self-monitoring, designed to evaluate facility-level implementation of the Code and other Adventist Health policies and standards of conduct for all of Adventist Health. Any findings from such assessments are reported and, if necessary, corrective action plans are then implemented. This auditing and monitoring process allows Adventist Health to identify potential areas of improvement, share best practices among facilities, and continually enhance the effectiveness of the Compliance and Ethics Program.

Adventist Health has also established an Adventist Health Compliance and Privacy Hotline (1-888-366-3833) for Associates to ask questions or report potential or suspected violations of the Code, Adventist Health policies, standards of conduct, or applicable laws and regulations when Associates are not comfortable communicating these matters within their usual organizational structures. The Hotline is accessible 24 hours per day, 7 days per week. All reports will be taken seriously, reviewed and investigated promptly, result in appropriate corrective and/or disciplinary action, if necessary, and, to the extent legally and practically possible, be treated in a confidential manner. An Associate has the option to make a Hotline report anonymously. In that event, Associates should understand that in a follow-up review or investigation, the reporter's identity may be learned as a natural consequence of the review or investigation. Retaliation against any Associate who, in good faith, reports potential or suspected violations is unlawful and will not be tolerated.

Reviews and investigations of potential or suspected violations of the Code, Adventist Health policies or applicable laws and regulations will be conducted under the direction of the Adventist Health Compliance and Privacy Department and/or the Regional Compliance Official, Human Performance associate or a representative from the Office of General Counsel. If an internal investigation substantiates a reported violation of the Code, Adventist Health will initiate corrective action, including, as appropriate, taking disciplinary actions, making prompt restitution of any overpayment amounts, notifying appropriate governmental agencies, conducting ongoing auditing and monitoring of particular risk areas, and implementing systemic changes to prevent similar violations of the Code from recurring. Any Associate found to be in violation of the Code will be subject to disciplinary action. The recommended disciplinary action will depend on the nature, severity, and frequency of the violation. Potential disciplinary actions may include: oral or written warnings, written reprimands, mandatory trainings, suspension, reassignment, termination, or restitution.

Adventist Health expects all Associates to cooperate with internal compliance investigation efforts. Likewise, it is Adventist Health's policy to cooperate in all governmental audits and investigations and for Associates to do so as well, subject to guidelines set forth in the Code and Adventist Health policies.

Conclusion

The Code does not address every difficult situation that an Associate may encounter in the workplace. While Adventist Health policies are intended to help Associates recognize, understand and fulfill their responsibilities, Associates are expected to take the initiative and ask questions if they are unsure how the laws or Adventist Health policies apply to a situation.

RELATED POLICIES AND PROCEDURES

Adventist Health Nonclinical and Clinical Policies and Procedures can be accessed by logging into New Connect at <https://adventisthealthwest.sharepoint.com/> and selecting Lucidoc.

Acknowledgment

I, _____, hereby acknowledge the receipt of the “Code of Conduct Policy.” I realize that the Code of Conduct Policy as well as the Adventist Health Employee Handbook contain many of the policies, standards of conduct, rules and regulations (“Policies”) to which I am subject. I further acknowledge that this Code of Conduct Policy supersedes and replaces all prior policies related to a code of conduct. I also understand that it is the intent of the Code of Conduct Policy as well as the Adventist Health Employee Handbook to give me some idea as to the policies to which I will be subject and that these documents do not comprise a complete manual. Except as provided in this Acknowledgment, I realize such policies may change from time to time.

Failure to comply with this Code of Conduct Policy and the Employee Handbook may result in disciplinary action.

Signature: _____ Date _____

Name (Please Print): _____

Relationship: (check all that apply) Associate Board Member

Question & Answers Appendix

I. ASSOCIATE/VOLUNTEER RESPONSIBILITIES

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 unit. 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 Policy – for example intentionally violating the organization's timekeeping and payroll policies.

Q: I work in the Human Performance Department. Lately I've been finding confidential colleague 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 colleague 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 associate on this issue.

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 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 Performance 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 your organization, your Human Performance Department or the Compliance and Privacy Hotline at 1-888-366-3833. 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, if you work in a clinical area, act immediately if patients or residents are at risk of harm from the actions of the colleague. Then notify your supervisor, a higher-level manager or your Human Performance 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: Before coming to work at Adventist Health, I worked for a competitor organization and received information that might help our organization in negotiating more favorable contracts with suppliers. 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 learn from your employment with Adventist Health with a future employer should you leave the organization.

II. INTERACTIONS WITH PHYSICIANS

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

A: Adventist 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 also discuss the matter with your supervisor, a higher-level manager, medical group office, or contact your Human Performance Department or the Adventist Health Compliance and Privacy Hotline at 1-888-366-3833.

Q: My job responsibilities require me to frequently interact with physicians on the Medical Staff. 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. 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 like Adventist Health. 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 your Local Compliance Official, or the Office of General Counsel in Roseville, California to learn more about our policies and to discuss any questions you have.

III. WHISTLEBLOWER PROTECTIONS

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: My organization was 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 your Local Compliance Official or the Adventist Health Compliance and Privacy Hotline at 1-888-366-3833.

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 healthcare providers and their associates from offering or accepting anything of value in exchange for the referral of Medicare, Medi-Cal and Medicaid patients. You should discuss this matter with a senior-level manager in your organization or your Local Compliance Official so that appropriate follow-up action can be taken with the home care agency.

Q: A government investigator tried to reach me at my home. She left a note asking me to call her to discuss my organization's billing practices. What should I do?

A: It is the policy of Adventist 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 Adventist 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, your Local Compliance Official or the Office of General Counsel, in Roseville, California.

IV. APPROPRIATE CARE & TREATMENT

Q: If I see that a patient is not being treated with proper respect and courtesy by another care provider, 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 unit or one of the resources listed for assistance. Remember that appropriate role modeling of respectful behavior is expected of all colleagues each and every day.

Q: What should I do if I know that a medical error has occurred? Should I tell the patient or the patient's family?

A: First, ensure the medical error has been properly reported to the Risk Management Department using the safety event reporting system. Adventist Health supports the timely and compassionate disclosure of medical errors when they occur, but in a manner that ensures proper communication and coordination with all caregivers. Follow Adventist Health's safety event reporting processes to ensure the communication with the patient and family is handled appropriately.

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 or resident wants – even if the individual's decision conflicts with your own values. You should make the patient or resident's 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, providing palliative care services. It

is important that the patient or resident be presented with appropriate options, so that any decision made is an informed decision. Please contact The Mission Integration Team, or ethics committee, if you have any questions or concerns.

V. PATIENT INFORMATION

Q: I work in a hospital and have access to the patient registration system. Recently a friend of mine was seen in the emergency room and later admitted to the hospital. I'm concerned and would like to check the patient registration system to see how she's doing or at least locate which room she's in so I can visit her. Is that okay?

A: Since you are not involved in your friend's care, you do not have any need to access her medical information or location. You may only access this type of information if needed to do your job. Note that Adventist 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 doctor uses a patient portal where I can look up information in my medical records, such as lab results. Is that okay? If yes, why can't I access my own medical records in the hospital where I work?

A: You are correct that accessing your own medical information through a patient portal provided by your physician is appropriate. As a patient, you are given access to view information in a portal that is available to other patients in your physician's practice. As a colleague, however, you are restricted to only accessing information that is needed to do your job. Accessing your own medical records for your personal information in Adventist Health information systems is not allowed. You may request copies of your medical records information from your hospital by following procedures established for all patients, such as contacting them through the Health Information Management Department.

Q: I am a nurse and one of the patients on my floor has asked that his same-sex, life partner be included in his discharge planning meeting. 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 discharge planning purposes, you should invite the patient's partner to attend the meeting. Adventist Health patients, residents, their family members and loved ones have a fundamental right to compassionate care that respects the dignity, diversity and specific wishes of those in our care.

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 or resident names, he sometimes discusses unusual cases in far more detail than I feel comfortable. Should I be concerned?

A: Yes. Omitting a patient or resident'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 or resident. Disclosure of confidential or sensitive information via social media not only puts our patients and residents 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 your organization's Privacy Official for assistance.

VI. CONFLICTS OF INTEREST

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

A: In general, Adventist 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 associate 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 associate attending the education or product demonstration and the cost of any meals provided must be modest.

Q: The firm Adventist 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: Adventist Health policy prohibits the acceptance of supplier paid compensation and expenses for travel, lodging and meals. If you are in position of decision-making regarding the purchase or use of the supplier's products in Adventist Health, 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 your Local Compliance Official.

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: My sister-in-law is a healthcare industry consultant. Is it okay if I recommend her to work on a consulting project at my organization?

A: Yes, however you should fully disclose your relationship to anyone in your organization 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 in my organization for a particular supplier. Our organization is conducting a major capital campaign and the supplier recently asked me what amount they should donate because they want to make sure they don't risk losing their Adventist Health contract. What should I say?

A: You should refer the supplier to the Corporate Philanthropy Department to discuss appropriate options for contributing to the capital 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.

VII. OTHER EMPLOYMENT

Q: I work full-time, 12-hour shifts, and would like to get some extra hours of work at another healthcare provider in the community. Do I have to discuss with my supervisor before I accept another position?

A: Before you consider an offer to work for a potential competitor of Adventist Health, 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 Adventist Health. The issue is especially important for full-time colleagues.

VIII. PERSONAL USE OF CORPORATE ASSETS

Q: There is a colleague in my department who regularly uses the Internet while at work for personal activities. I am not in a position where I'm supposed 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 Adventist 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 Adventist Health policies.

Q: I recently witnessed some unusual activity occurring on the loading dock at my site. Several shipments of expensive computer equipment delivered to the site were 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 your Local Compliance Official. 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 in your organization.

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 in your organization. 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 your organization or your organization's Local Compliance Official for assistance.

IX. OUTSIDE RELATIONS

Q: A colleague recently posted a notice on our department's 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 Adventist 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 and could jeopardize the organization's tax-exempt status. You should discuss this matter with your supervisor or contact your Local Compliance Official.

Q: A friend of mine works in the Human Performance Department at another hospital in our community. He wants to do a survey of area healthcare salaries. May I share our organization'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 your Local Compliance Official or the Office of General Counsel, for appropriate follow-up.

Living God's
love
by inspiring
health,
wholeness and
hope.

