

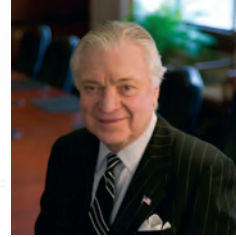
# UHS CODE OF CONDUCT

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Our commitment to ethical conduct and compliance depends on all UHS personnel.

If you find yourself in an ethical dilemma or suspect inappropriate or illegal conduct, discuss it with your supervisor or use the reporting process in this Code of Conduct, including the Compliance Hotline (toll free at **1-800-852-3449**) or internet-based reporting at **[www.uhs.alertline.com](http://www.uhs.alertline.com)**

# A Message from Alan B. Miller and Marc D. Miller



Ethics and accountability are central to the core values and mission of UHS. Our patients and their families put their trust in us, as do our personnel, clinicians, vendors, business partners, investors and others, including the communities we serve. We share the important responsibility to continuously strive to achieve the highest standards of ethical conduct.

The Board of Directors and senior management of UHS are committed to compliance and ethical behavior. UHS has written this Code of Conduct to provide guidance on expectations for acceptable behavior for those who work on behalf of UHS. It provides a broad overview of compliance concepts and builds on the Code of Business Conduct and Corporate Standards, the UHS Compliance Manual, as well as the policies and procedures of our Compliance Program.

The Code of Conduct is one of the most important communications you will ever receive. It is the cornerstone of all UHS practices. You will need to read it from cover to cover. We expect you to understand and follow the Code of Conduct and help to make sure others do as well. Although no single document can provide all the answers, the Code of Conduct is a valuable resource designed to give guidance on where to turn if you see any inappropriate or unethical conduct or decisions being made.

Lead by example, ask questions if you don't know the answer, and report any problems or concerns about inappropriate or unethical actions. You can go to your supervisor, to management, to your facility compliance officer, UHS Compliance Office, or use other avenues described in this document, including the toll-free Compliance Hotline (**1-800-852-3449**) or via the internet at **[www.uhs.alertline.com](http://www.uhs.alertline.com)**. UHS will not retaliate or tolerate any retaliation against you for reporting in good faith.

If we work together, we can achieve our goals — a work environment that puts patient care first and fosters service excellence, compassion, and the ethical and fair treatment of all.

Sincerely,

**Alan B. Miller**  
Chairman and  
Chief Executive Officer

**Marc D. Miller**  
President



## Introduction

UHS is dedicated to adhering to the highest ethical standards. Common sense, good business judgment, ethical personal behavior, as well as compliance with applicable laws, policies and procedures are what we expect from all UHS personnel. The Code of Conduct details the fundamental principles, values and framework for action within the organization. It is intended to deter wrongdoing and promote:

- Honest and ethical conduct
- Compliance with all applicable governmental laws, rules and regulations
- Prompt internal reporting of violations and compliance concerns

The Code of Conduct is intended to provide a general overview of basic compliance concepts and to give guidance on acceptable behavior for UHS personnel, including all those who work on behalf of UHS — our personnel, vendors, physicians, and others affiliated with us or doing business in UHS facilities or offices. The Code of Conduct is not intended to fully describe the laws that apply to personnel or to detail company policies and procedures. An expanded overview of the UHS Compliance Program is provided in the UHS Compliance Manual, available from your supervisor, human resources department, compliance officer, the UHS Compliance Office, or on our company website at **[www.uhsinc.com](http://www.uhsinc.com)**. Personnel are also required to follow the standards governing business conduct in the Code of Business Conduct and Corporate Standards, available online at **[www.uhsinc.com/corporategovernance1.php](http://www.uhsinc.com/corporategovernance1.php)**.

# Mission Statement

UHS is committed to providing superior quality healthcare services that patients recommend to families and friends, physicians prefer for their patients, purchasers select for their clients, personnel are proud of, and investors seek for long-term results. We will realize this vision through our commitment to the following principles:

## **Service Excellence:**

We will provide timely, professional, effective and efficient service to all of our customer groups.

## **Continuous Improvement in Measurable Ways:**

We will identify the key needs of our customers, assess how well we meet those needs, continuously improve our services, and measure our progress.

## **Employee Development:**

We understand that the professionalism and drive of our people are the most important factors in the quality of the service UHS provides. We will hire talented people, increase their skills through training and experience, and provide opportunities for personal and professional growth within the company.

## **Ethical and Fair Treatment of All:**

We are committed to forming relationships of fairness and trust with our patients, the physicians, purchasers of our services, and our personnel. We will conduct our business according to the highest ethical standards.

## **Teamwork:**

We will work together to provide ever-improving customer service. This team approach to our work will supersede traditional departmental organization and create a true customer focus. People at all levels of the organization will participate in decision-making and process improvement.

## **Compassion:**

We will never lose sight of the fact that we provide care and comfort to people in need. The patients and families who rely upon us are fellow human beings, and they will receive respectful and dignified treatment from all of our people at all times.

## **Innovation in Service Delivery:**

We will invest in the development of new and better ways of delivering our services.



# Patient Care

UHS is committed to providing high-quality patient care in the communities we serve, and advocates a responsive management style and a patient-first philosophy based on integrity and competence. We treat our patients with respect and dignity, providing high-quality, compassionate care in a clean, safe environment.

The Code of Conduct applies to all UHS personnel, including those who work on behalf of UHS — personnel, vendors, healthcare professionals, and all other personnel affiliated with UHS or doing business in our facilities and offices.

## **Healthcare Professionals:**

The Code of Conduct applies to healthcare professionals who work with or are affiliated with UHS facilities. In addition to the guidelines set forth in the Code of Conduct, healthcare professionals are expected to carry all required licenses and follow the ethical and professional standards dictated by their respective professional organizations and licensing boards.

## **Leadership Responsibilities:**

We expect our leaders to set the example — to be in every respect a role model. Our leaders should help to create a culture that promotes the highest standards of ethics and compliance. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

# Compliance

UHS is committed to full compliance and expects its personnel to obey all applicable state, federal and local laws, to comply with UHS and facility policies and procedures, and to follow the guidelines in this Code of Conduct. Compliance will be an important aspect of performance evaluations. A violation of this Code of Conduct, UHS or facility policies and procedures, or any law or regulation will be handled through normal disciplinary procedures, and may lead to serious disciplinary action, up to and including immediate termination.

## **UHS and Facility Policies and Procedures:**

UHS personnel are required to understand and follow all policies and procedures that apply to their work at UHS. If anyone has a question about the applicable legal, policy or procedural requirements, they should ask their supervisor. The UHS Compliance Program policies and procedures are available on the web at: [www.uhsinc.com](http://www.uhsinc.com) or by contacting the applicable Facility Compliance Officer or the UHS Compliance Office.

## **Code of Business Conduct and Corporate Standards:**

UHS personnel are expected to perform their duties in good faith to the best of their ability and not engage in any illegal, unfair or deceptive conduct relating to business practices, conforming with the standards for business conduct set forth in the Code of Business Conduct and Corporate Standards, available through the applicable human resources department or online at [www.uhsinc.com/corporategovernance1.php](http://www.uhsinc.com/corporategovernance1.php).

## **Laws and Regulations:**

UHS expects its personnel to fully comply with all applicable laws and regulations federal, state, and local. Failure to comply with legal requirements can lead to serious disciplinary action, up to and including immediate termination. Key healthcare compliance laws which are addressed in more detail in the UHS Compliance Manual include the following:

The physician self-referral law, known as the Stark law, which prohibits hospitals from submitting any claim for certain services called designated health services if the referral comes from a physician with whom the hospital has a prohibited financial relationship.

The Federal anti-kickback statute and similar state statutes, which prohibit payments (direct or indirect) made to induce or reward the referral or generation of government healthcare program business.

The Emergency Medical Treatment and Labor Act (EMTALA), which contains requirements for the evaluation and treatment of emergency patients.

Laws authorizing the Office of Inspector General (OIG) to exclude healthcare providers from participation in Federal healthcare programs that provide unnecessary or substandard items or services provided to any patient.





Privacy and security laws and regulations that protect patient information, including protected health information (PHI) under the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health (HITECH) Act of 2009.

Federal and state false claims statutes and whistleblower protections that serve a key role in preventing and detecting fraud, waste, and abuse in the federal healthcare programs.

### **Coding and Billing Integrity:**

All billing practices as well as the preparation and filing of cost reports must comply with all federal and state laws and regulations as well as UHS and facility policies and procedures. Personnel will assist UHS in identifying and appropriately resolving any coding and billing issues or concerns. UHS will refund overpayments made by a federal healthcare program or other payers in accordance with applicable law.

### **Relationships with Federal Healthcare Beneficiaries:**

Federal fraud and abuse laws prohibit offering or providing inducements to beneficiaries in government healthcare programs and authorize the OIG to impose civil money penalties (CMPs) for these violations. Government healthcare programs include Medicare, Medicaid, Veterans Administration and other programs. UHS personnel may not offer valuable items or services to these patients to attract their business (including gifts, gratuities, certain cost-sharing waivers, and other things of value).

### **Fraud and Abuse, the False Claims Act and Whistleblower Protections:**

UHS intends to fully comply with the federal False Claims Act (FCA) and any similar state laws that fight fraud and abuse in government healthcare programs. The FCA contains a qui tam or whistleblower provision, which permits a private person with knowledge of a false claim for reimbursement by a government agency to file a lawsuit on behalf of the U.S. government. In addition, there are individual state laws providing that persons who report fraud and abuse by participating healthcare providers in the Medicaid Program may be entitled to a portion of the recovery. Under both the FCA and similar state laws, there are protections against retaliation.

### **Ineligible Persons, Excluded Individuals and Entities:**

UHS does not do business with, hire, or bill for services rendered by excluded or debarred individuals or entities. UHS personnel must report to their supervisor or human resources department immediately if they become excluded, debarred or ineligible to participate in any government healthcare program, or become aware that anyone doing business with or providing services for UHS has become excluded, debarred or ineligible.

### **Monitoring and Investigation:**

UHS is committed to monitoring and investigating compliance concerns relating to laws, regulations and/or UHS or facility policies. When a violation is substantiated, UHS will initiate corrective action including, as appropriate, resolving overpayments, making required notifications to government agencies, implementing systemic changes to prevent recurrences, and instituting disciplinary action.





## Medical Records

UHS strives to ensure facility medical records are accurate and to provide information that documents the treatment provided and supports the claims submitted. Tampering with or falsifying medical records, financial documents or other business records of UHS will not be tolerated. The confidentiality of patient records and information must be maintained in accordance with privacy and security laws and regulations that protect patient information, including protected health information (PHI) under HIPAA and HITECH and applicable state laws.

## Employment

UHS promotes diversity and strives to provide a workplace environment that is in full compliance with all applicable employment-related laws as well as UHS and facility policies and procedures. It is UHS policy to provide equal employment opportunities to all personnel, prospective and current, without regard to race, color, religion, sex, age, national origin, marital status, disability, or veteran status, and UHS will do its best to make reasonable accommodations for known disabilities. UHS personnel who have questions concerning or are aware of any breach of the Equal Employment Opportunity (EEO) guidelines, should contact the applicable human resources department. UHS prohibits workplace violence, threats of harm, and harassment of its personnel of any kind.



## Environment and Workplace Safety

UHS expects its personnel to obey all state, federal and local environmental and workplace safety laws, regulations and rules, including those promulgated by the Environmental Protection Agency and the Occupational Safety and Health Administration (OSHA).

## Reporting Suspected Wrongdoing

UHS is committed to complying with all applicable laws and regulations, including those designed to prevent and deter fraud, waste and abuse. UHS personnel with knowledge of or who in good faith, suspect any wrongdoing are expected to promptly report the matter, using one of the processes described below.

There are many ways to report suspected improper conduct. In most cases, concerns should be brought to the attention of a supervisor first. If this does not result in appropriate action, or if personnel are uncomfortable discussing these issues with their supervisors, they can use one or more of the other reporting methods described below:

- Report to an immediate supervisor, manager, risk manager, Facility Compliance Officer, applicable Human Resource Director, or the UHS Compliance Office.
- Use the toll-free Compliance Hotline (**1-800-852-3449**) or via the internet at **[www.uhs.alertline.com](http://www.uhs.alertline.com)** — these reports may be made anonymously.

Self-reporting is encouraged — anyone who reports their own wrongdoing or violation of law will be given due consideration in potential mitigation of any disciplinary action. Retaliation in any form against anyone who makes a good faith report of actual or suspected wrongdoing or cooperates in an investigation is strictly prohibited. Anyone who feels that they have been retaliated against should report this immediately, using any of the methods described above.



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The UHS commitment to compliance and ethical conduct depends on all personnel. Should you find yourself in an ethical dilemma or suspect inappropriate or illegal conduct, remember the internal processes that are available for guidance or reporting, including reporting to your supervisor or using the toll-free compliance hotline at **1-800-852-3449** or via the internet at **[www.uhs.alertline.com](http://www.uhs.alertline.com)**.

Any reference in this Code of Conduct to "UHS personnel" or employment with UHS refers to employment with, or employees of subsidiaries of Universal Health Services, Inc., including UHS of Delaware, Inc.