

Policy # CW CR 101.0	Policy Name Code of Conduct
Policy Location Corporate-wide	Responsible Department Corporate Responsibility
Executive Owner Nancy Hayt VP Corporate Responsibility	Original Creation Date November 17, 1998
Policy Effective Date February 25, 2003	Policy Review Date November 24, 2020

I. SCOPE: All workforce members, and facilities owned and managed by AdventHealth are covered under this policy.

II. PURPOSE: To set forth basic principles and guidelines for the employees of AdventHealth corporation and its subsidiaries.

III. POLICY: As an organization that is guided by ethics, AdventHealth is committed to maintaining the highest professional and ethical standards at every level of our business.

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The Code of Conduct, known as CORE (Commitment. Obligation. Responsibility. Ethics.), is an important tool to help promote and maintain a culture of honesty, integrity and accountability. It helps unite us all by communicating the expectations and behavioral standards across our organization – fostering a safe, healthy work environment that values its team members and those in our care.

All representatives of AdventHealth, including employees, administrators, supervisors, clinical staff, contractors, volunteers, and other agents, are expected to comply with the Code of Conduct, regardless of individual responsibilities.

i. Points of Integrity

a. Quality of Care

With a long-standing history of commitment to excellence, our common objective is to provide the highest quality, affordable care for all our patients while respecting the patients’ rights. We are committed to delivering medically necessary health care in a compassionate, respectful and ethical manner without regard to race, creed, color, religion, national origin, gender or disability.

b. Patient Rights

Caregivers will provide patients with information regarding rights and responsibilities

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and we will make every effort to protect those rights throughout their care and treatment. Our healthcare providers will give patients information concerning diagnosis, treatment, alternatives, risks and prognosis. Team members of AdventHealth will respect each patient's right to impartial access to all medical care, treatment or accommodations that are available and medically indicated.

We will ensure that the patient knows which support services are available within our facilities, such as interpreter services. Patients have a right to express grievances regarding any violation of their rights through the grievance procedure of the health care provider or facility that served the patient.

c. Confidentiality of Patient Information

We have significant safeguards to maintain the confidentiality, integrity and availability of patient information. Under the Health Insurance Portability and Accountability Act (HIPAA), we uphold all standards for maintaining our patient's protected health information. Sharing of private information with anyone, including other caregivers or others outside the organization, is strictly forbidden unless the person receiving the information has a legitimate business or care-related need.

Confidential information includes protected health information, which may be accessed, used or disclosed only in accordance with AdventHealth privacy and security policies.

ii. Business Ethics

We are committed to complying with all applicable federal, state and local laws and regulations, including those described below.

a. Fraud, Waste and Abuse

Our policies are designed to prevent and detect fraud, waste and abuse activities within our organization. Various federal and state laws, including the Federal False Claims Act, prohibit false claims and other fraudulent activity, such as knowingly submitting a false claim or making a false statement to get a fraudulent claim paid.

b. Anti-Kickback and Bribes

AdventHealth policies, as well as federal and state laws, prohibit anyone from offering, paying, asking for, or accepting any money or other benefit in exchange for patient referrals, purchases, leases or orders. All contracts and interactions with any referral source are to follow all applicable laws and regulations.

c. Emergency Treatment

We will provide a medical screening examination and, if appropriate, stabilizing treatment to all patients who come to an AdventHealth hospital or dedicated emergency department for emergency treatment, regardless of their ability to pay. AdventHealth will only transfer patients with emergency medical conditions to another facility in compliance with state and federal requirements and AdventHealth

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policies.

d. **Excluded Individuals and Entities**

We will not knowingly employ or contract with individuals or entities that have been listed as debarred, excluded or ineligible to participate in a federal healthcare program. As a condition of employment, employees are required to notify Human Resources immediately if they are currently excluded from participation in federal or state health care programs, including such agencies as the Federal Department of Health and Human Services Office of Inspector General, General Services Administration or the applicable Medicaid Exclusion and Suspension List.

e. **Not-for-Profit Organization**

AdventHealth is a responsible not-for-profit, tax-exempt entity because of its charitable mission to serve the healthcare needs of our communities. We provide benefits that include healthcare services, medical training, education, research and community outreach activities – using resources in a manner that further the public good rather than the private or personal interests of any individual or entity.

iii. **Records Integrity**

a. **Accurate Records**

We are committed to ensuring accurate and reliable patient and organizational records. Business records are prepared honestly and in accordance with established finance and accounting procedures. Preparation and documentation of all patient records will be completed accurately, and records will be kept confidential, except when release of information is authorized and where legal exceptions apply. Maintaining concealed or unrecorded funds or assets and false or fictitious entries in any books or records, within AdventHealth or its subsidiaries, are prohibited.

AdventHealth maintains a high standard of accuracy and completeness in the documentation and reporting of all financial records. These records serve as a basis for managing our business and are important in meeting our obligations to patients, employees, supplier and others – while also necessary for compliance with tax and financial reporting requirements.

b. **Financial and Billing Practices**

We ensure openness, honesty and accuracy in billing for services, as well as being accountable for the use of corporate assets. Payments and other transactions will be properly authorized, completed and accurately recorded in accordance with generally accepted accounting principles and AdventHealth policies.

Upon request, we will provide a reasonable estimate for services, before medical services are provided. Team members will evaluate each situation of financial hardship individually, in accordance with AdventHealth's financial need policies, to determine whether a patient is in need of financial assistance, and the appropriate plan of action to be followed.

Any business conflicts are to be resolved in a fair and equitable manner. If

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overpayments are identified, AdventHealth will promptly return the amount received in excess of the amount due and payable under any regulatory requirements.

iv. **Workplace Environment**

a. **Employment Opportunity**

Our people are our greatest asset, and a diverse workforce enables us to meet the needs of our diverse patient population. AdventHealth is an equal opportunity workforce and provides an inclusive work environment, as supported by our Human Resources policies and procedures.

b. **Discrimination and Harassment**

We maintain a positive work environment that aligns with our mission, vision and values, in which all individuals are treated with fairness, dignity and respect. AdventHealth will not tolerate any form of workplace discrimination, harassment, intimidation or retaliation.

c. **Gifts and Business Courtesies**

All gifts or business courtesies, such as meals and entertainment with outside entities, must meet the requirements that are established within our policies. We discourage the appearance of favoritism and giving or accepting of gifts that may influence relationships, decision making, or business or governmental outcomes. Additionally, our caregivers are not permitted to solicit or receive personal gratuities or gifts from any source. If team members are unclear on the nature, value and circumstances of an offer, or whether it's reasonable and ethical, contact management for further guidance.

d. **Business Relationships**

Team members are required to employ fairness and impartiality with business relationships, partners and contractors. AdventHealth will enter into business relationships that will not conflict, or appear to conflict, with our business objectives and responsibilities.

e. **Conflict of Interest**

We hold ourselves to a high standard of honesty, objectivity and fairness in regard to potential conflicts of interest and our outside business activities – always acting in the best interests of AdventHealth. Should a situation arise that may create a business conflict or influence a team member's ability to make objective decisions, contact your manager or Regional Corporate Responsibility Officer for clarification.

f. **Marketing and Advertising**

We engage in marketing, advertising and communications activities to educate the public, provide information to the community, increase awareness of our services and recruit employees – in an effort to support our mission and brand positioning. While ensuring accuracy and sensitivity to our organizational culture, we will offer factual and transparent information to the general public, without distorting the truth, making false claims, engaging in comparative advertising or employing disparaging tactics against another provider of services.

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We will only enter into open, honest agreements that are not intended to fix prices or reduce price competition while complying with applicable legislative and ethical guidelines related to marketing activities. Third party vendors and contractors may not use or associate our name, symbols, logos or trademarks in external materials without prior consent from our Corporate Office Brand Management Department.

v. **Our Responsibility**

Each team member is expected to honor and uphold AdventHealth's Code of Conduct principles and take responsibility for their own actions. We are committed to knowing and complying with applicable healthcare laws and regulations. Although we strive to meet our expectations, responsibilities and high ethical standards in every situation, every time, if you are aware of or have a suspicion about a situation that fails to meet our standards, you have a responsibility to bring it to light. It is every employee's responsibility to report suspected violations of the Code of Conduct or other unethical matters to the appropriate Corporate Responsibility representative.

a. **Leadership Role**

Our management team and supervisors at every level are responsible for making sure that employees are aware of and adhere to the provisions of the Code of Conduct. Leaders are expected to set the example, serve as a role model and exercise their responsibilities in a manner that is kind, compassionate, thoughtful and respectful. Each supervisor must create an environment where everyone is encouraged to raise concerns, ask questions and propose ideas – maintaining an open-door policy. Managers must take prompt, appropriate action when a potential violation or policy inquiry arises and should seek assistance from their Regional Corporate Responsibility Officer in addressing questions or concerns.

b. **Non-Retaliation Policy and Discretion**

We understand that employees may be reluctant to report suspicious activity due to a fear of retaliation. We want to assure our team members that we enforce a strong non-retaliation policy and prohibit any form of retaliation or retribution toward a team member who reports, in good faith, an alleged act of misconduct. We will treat all reports as confidential and privileged to the extent allowed by law and protect the identities of the team members involved to the maximum extent possible.

IV. PROCEDURE/GUIDELINES: Not applicable

V. DEFINITION(S): Not applicable

VI. EXCEPTION(S): Not applicable

VII. REFERENCE(S): Not applicable

VIII. RELATED DOCUMENT(S) / ATTACHMENT(S): not applicable

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