



CODE *of* CONDUCT

"Ethical conduct leads to excellent care."

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CODE *of* CONDUCT

"Ethical conduct leads to excellent care."



Introduction

Rick Henvey, CEO

Parkview Health is committed to ethical conduct in everything we do. When caring for our patients, their families and our communities, we hold ourselves to the highest standards. Ethical conduct leads to *Excellent Care, Every Person, Every Day.*

As CEO of Parkview Health, I am proud of the culture of ethics and compliance that we have built. Ethical and compliant conduct protects our co-workers, our patients and our guests. Let's all work together to maintain our culture of ethics and compliance and keep our patients and our co-workers safe. By using this Code of Conduct and the many other tools that Parkview has available, we can all keep Parkview on the right path. *Thanks for joining me on this important journey!*

Rick Henvey

I. PARKVIEW'S CULTURE OF COMPLIANCE

1. Compliance Is Important at Parkview

At Parkview, ethical conduct serves as the foundation for everything we do. Our board members and leaders are deeply committed to ethical conduct and promoting a culture of compliance.

Why do we care so much about compliance? Because the health care laws and rules were created to protect patients. Going to the hospital is like flying on an airplane. You are putting your life in the hands of others, and you want to be 100 percent sure that they follow the rules and do things right.

2. Just Culture

As part of our commitment to ethical conduct and compliance, Parkview Health also fosters a "Just Culture" work environment where co-workers can feel empowered to report mistakes, errors or system failures and have the confidence that matters will be thoroughly investigated to determine the appropriate course of action. This does not mean that a co-worker is not held accountable for their actions, but it does mean that a co-worker is not held accountable for a flawed system in which trained co-workers can still make mistakes. This type of environment presents more of a learning approach, the opportunity to properly identify accountability and determine what can be done differently in the future.



PARKVIEW'S JUST CULTURE:

- Is part of a compelling vision for high reliability;
- Is built on trust, dignity and respect for each other;
- Maintains patient and workforce safety as a core value;
- Empowers staff to speak-up and report errors, near misses, and recognize unsafe behaviors and conditions;
- Creates a non-punitive reporting environment where it is safe to report and learn from mistakes and system flaws; and
- Is fair and just by balancing learning with accountability when assessing errors and system flaws.

I. PARKVIEW'S CULTURE OF COMPLIANCE (continued)

3. Our Culture and Values

TRUST – Inspiring confidence by being authentic and reliable

COMPASSION – Engaging others with empathy and kindness

RESPECT – Having regard for the wishes, rights and traditions of others

TEAMWORK – Building partnerships by emphasizing team over self

INNOVATION – Creating new and better ways to drive transformation

STEWARDSHIP – Being mindful of resources when making decisions

Through these values, we create an atmosphere where our co-workers feel valued and can provide the best care possible to our patients. Our culture and values will help us achieve our mission of inspiring the well-being of our communities.

4. What are my obligations?

It is the duty of all co-workers, contractors and volunteers to know and understand the ethical standards, legal standards and Parkview policies applicable in performing their daily tasks. Parkview's Corporate Compliance Program is designed to assist all co-workers to know and understand these ethical and legal standards through ongoing training and communication. This Code will help you comply with these standards and keep you on the right path. Failure to follow this Code of Conduct or Parkview's established standards could result in corrective action.

SPEAK UP. Open lines of communications are a vital part of Parkview's Compliance Program. Co-workers must report to their leader or to the Compliance Department any and all actual or suspected violations of applicable laws, regulations, Compliance policies or the Code. Co-workers have the same reporting obligations for actual or suspected violations committed by a subcontractor or vendor of Parkview Health. Parkview Health provides multiple reporting lines to ensure that co-workers are comfortable with whom they communicate compliance issues.



STORIES FROM THE ROAD

Brian was talking with his supervisor about his new role in Parkview's EVS Department. Brian expressed frustration with all of the new rules and policies he had to learn, but his supervisor gave him some really good advice. He said *"Brian, imagine you owned your own business. Your name was on the front door and you were trying to create the best business you could. You would want to make sure that your business did things the right way and followed the policies you put in place, especially those that kept your customers safe."* Brian agreed with everything his supervisor was saying, and then his supervisor said, *"Well, guess what, you do own a business. It's called Parkview Health. We're all responsible for making sure that we do things right and protect our patients."*



ROAD SIGN

THE CODE OF CONDUCT is a guidebook that will help you navigate daily life at Parkview and keep you on the right path.

II. GUIDING YOU ON THE RIGHT PATH

This Code of Conduct (the “Code”) is intended to assist you in carrying out your day-to-day activities ethically and legally. The Code also establishes the framework for our system-wide Corporate Compliance Program. **Think of it as a guidebook that will help you navigate your daily life at Parkview.**

As discussed throughout this Code, ethical conduct is essential to our success, and we are committed to conducting ourselves in compliance with all applicable laws and regulations and avoiding any impropriety, dishonesty, or wrongdoing. We also know that, in our busy daily lives at Parkview, we all need help to stay on the right path and avoid potential trouble. This Code does not cover all of Parkview’s policies and standards, but it provides a helpful overview of the basic “rules of the road” that every co-worker should know and follow.

The Code starts with key topics that apply to all co-workers regardless of your role. It then moves on to more intermediate and advanced topics that may not come up every day, but are still important for everyone to know. Throughout the Code, there are lots of examples and practical tips that will help explain how health care rules and regulations apply. Look for these in the boxes marked “Road Sign” and “Stories from the Road.” Keep in mind, this Code is just a starting point. See the following page to get more help.

II. GUIDING YOU ON THE RIGHT PATH (continued)

A. What other resources are there?

While this Code provides an overview of our standards of conduct and key compliance matters, we have many more resources available to help you. Please visit the Compliance Department Pulse page for additional information and resources, including a copy of our written Compliance Plan. We also have many helpful educational and training materials available for you or your department to use, including computer-based learning modules, topic-specific presentations and compliance tips and guides.

If you have any questions regarding this Code of Conduct or the Compliance Program, please do not hesitate to contact our Corporate Compliance Department at 260-373-7100 or call our Compliance Hot Line at 855-773-0012. You may also contact one of our Compliance team members via e-mail (email addresses are available on the Compliance Department's Pulse page).



B. How do I report a compliance concern?

There are many ways to report compliance concerns. Co-workers may contact their leader, Parkview's Chief Executive Officer, Parkview's Chief Compliance Officer or contact the Compliance Department. Another easy way to get help is to call the Compliance Hot Line number 855-773-0012 or use the "Report a Compliance Concern" button on the Team Parkview homepage.

You may report a compliance concern at any time — day or night — and you can remain **anonymous**. Even if you do not wish to remain completely anonymous, we will still try to keep your identity confidential to the extent possible, unless doing so prevents us from fully and effectively investigating the suspected violation.

If you have a particularly sensitive concern or you do not feel comfortable reporting your concern to the Compliance Department, then you may utilize the Special Fraud Hotline that is managed by an outside company. To make an anonymous report to the Fraud Hotline, co-workers may:

- Call 833-220-0010 (English) or 833-220-0010 (Spanish);
- Send an email to reports@lighthouse-services.com; or
- Fax 215-689-3885.

Importantly, reports made to the Special Fraud Hotline will then be sent directly to the independent board member serving as Parkview's Compliance and Audit Committee Chair who will then review the issue and oversee an investigation into the issue.

Keep in mind that there will never be any retaliation against co-workers for good faith reporting of compliance concerns.



ROAD SIGN

Patients are at the center of everything we do. Compliance protects patients.



STORIES FROM THE ROAD

Mia has worked at Parkview for three years. She recently started having some concerns about compliance issues in her department. Mia mentioned her concerns to her supervisor, but was told "not to worry about it" and that it was not part of her job. Mia asked if she should reach out to Compliance for help, and her supervisor told her that she was not permitted to do so and that only leaders are allowed to call Compliance. Mia didn't feel good about the situation and anonymously reached out to Compliance for help.

Mia learned that *anyone is permitted to contact the Compliance Department at any time*. Compliance is the responsibility of every single Parkview Health co-worker, and each co-worker should feel empowered to spot and report compliance concerns whenever they are found. Your leader is often the best place to start when you have a concern, but you can always contact Compliance directly if you still have concerns. Importantly, you can never be retaliated against by your supervisor or others for reporting a compliance concern in good faith.

III. OUR COMPLIANCE JOURNEY



A. THE BASICS

Compliance information everyone needs for their journey

This section of the Code provides a helpful overview of topics that most co-workers will encounter on a daily basis. It is helpful to review these topics and the guidance below at least once per year, but you will likely find it helpful to review them more frequently.

1. Patient Care

PARKVIEW HEALTH'S CORE FOCUS IS THE WELL-BEING, COMFORT, AND DIGNITY OF OUR PATIENTS. All patients are provided with service and care that is medically necessary and appropriate in a respectful and dignified manner, without regard to race, color, creed, gender, religion, national origin, sexual orientation, marital status or age.

Upon admission to any Parkview Hospital, patients are provided with a written statement of their rights. These Rights include:

- Be involved in their plan of care;
- Be involved in how we care for them;
- Receive an itemized bill;
- Have Advanced Directives; and
- Confidentiality and access to their medical records.

Patients and, as appropriate, their families or representatives, will be given the information necessary to enable them to give informed consent prior to the start of any non-emergency procedure or treatment. The providers have a responsibility to inform patients about their proposed plan of care, including the risks, benefits, and alternatives available to them. Parkview Health respects patients' rights to make informed decisions about treatment, as well as to establish advance directives. Parkview Health honors patients' advance directives, within the limits of the law and the mission, philosophy, and capabilities of Parkview Health.



ROAD SIGN

All patients are provided the medically necessary care that they need in a respectful, compassionate and dignified manner regardless of their ability to pay.

2. Caring for Patients Regardless of Their Ability to Pay

At Parkview, we take great pride in our promise to provide Excellent Care, Every Person, Every Day—regardless of the patient’s ability to pay. Parkview maintains a Financial Assistance Policy that summarizes how a patient in need may apply for financial assistance. It also provides a plain language summary of our policy.

In addition to our Financial Assistance Policy, Parkview also has specific obligations under the Federal Emergency Medical Treatment and Labor Act (EMTALA) laws that require health systems with emergency departments to assess all patients who present to the ED regardless of their ability to pay.

More importantly, however, caring for patients in need is simply the right thing to do. Parkview is committed to treating our communities ethically and fairly in order to improve their health and inspire their well-being. For more information about Parkview’s Financial Assistance Policy, please visit: <https://www.parkview.com/patients-and-visitors/billing-and-insurance/financial-assistance>.



III. OUR COMPLIANCE JOURNEY

A. THE BASICS (continued)

3. Confidentiality

Parkview Health wants to ensure that its confidential business information, including patient information, is protected. When you first join Parkview Health, you are asked to sign a confidentiality statement acknowledging that you are required to keep certain information confidential.

Although you may use this confidential information to perform your job, it is not public information and should not be shared with others outside of Parkview. Some examples of confidential workplace information may be HR data, patient lists, patient's medical records, marketing strategies, research data, processes, techniques, computer software and other intellectual property or trade secrets. Within Parkview Health, you should discuss confidential information on a strictly "need to know" basis only with other co-workers who require this information to perform their jobs. Importantly, confidential information may never be used by you, your family members or others to buy or sell securities, such as stocks, or to otherwise derive a personal financial benefit.



ROAD SIGN

Confidentiality is very important in health care. Confidential information that we see and hear at Parkview should stay at Parkview.

4. Privacy and HIPAA

Patients trust Parkview with their most sensitive personal information, including medical conditions, medications and family history of illnesses. Breaching our patient's trust by misusing or inappropriately disclosing personal information would not only be a legal violation, but would be a violation of our core principles. At Parkview, we are committed to maintaining the confidentiality of our patients' personal health information and complying with the Health Insurance Portability and Accountability Act (HIPAA) regulations.

HIPAA is comprised of five sections, two important sections for Parkview co-workers are HIPAA Privacy and HIPAA Security. Privacy is about how we use and disclose protected health information (PHI) and Security is about securing electronic health information (EHI) while dormant or in transit. PHI is any health information, whether oral, written or electronic that relates to the past, present, or future physical or mental health or condition of any individual, the provision of health care to an individual, or the past, present, or future payment for the provision of healthcare to an individual.



A simple rule to keep in mind is that we should only access or disclose a patient's health information *when it is necessary to do our jobs*. Even then, we try to limit the amount of information that we access or disclose to be the minimum amount necessary to accomplish our current tasks.

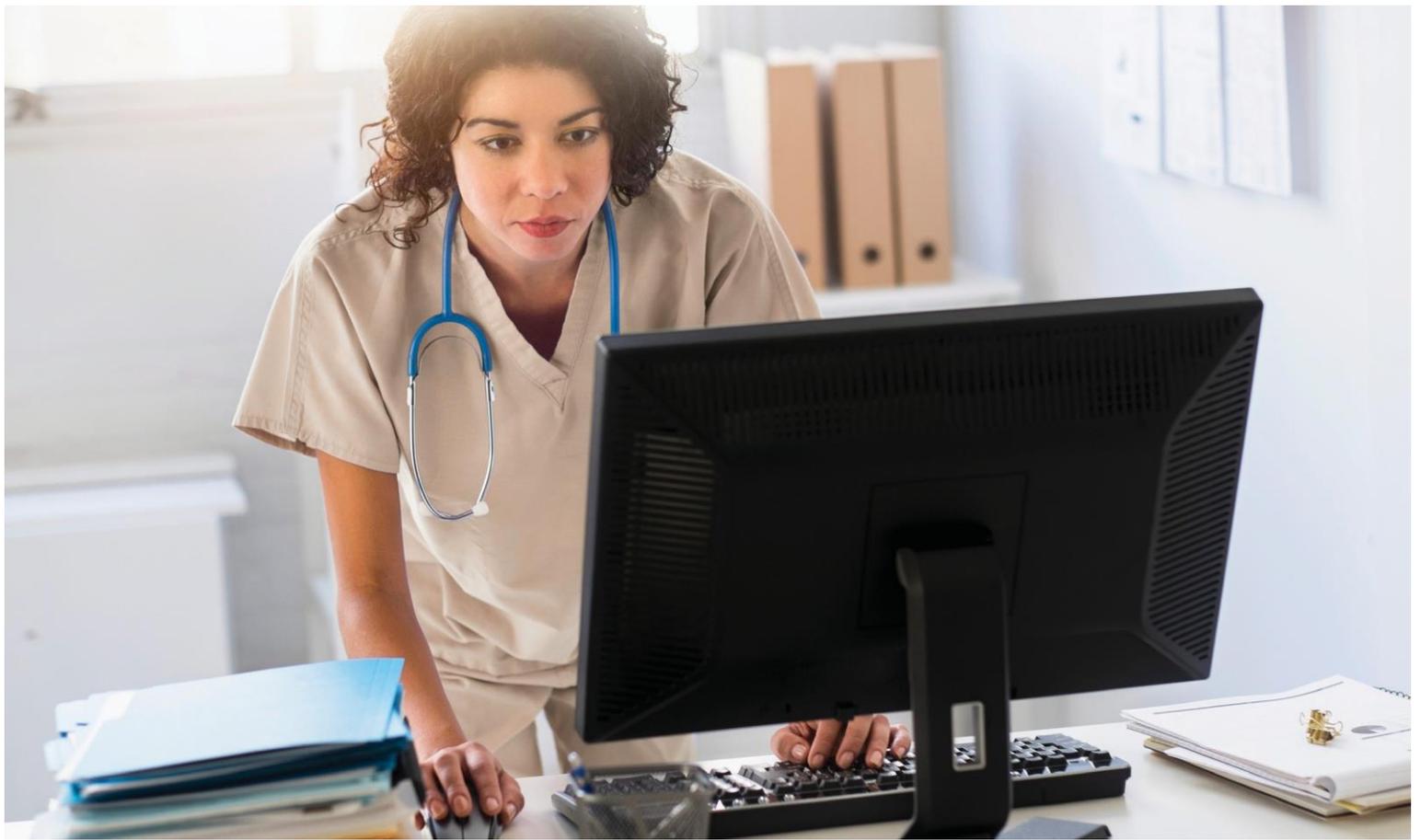
If you are concerned that you or another co-worker may have accessed or disclosed patient information inappropriately, immediately contact your leader or the Compliance Department for help. Inadvertent disclosures can often be corrected, but they must be addressed as soon as possible to reduce the risk of harm to the patient.



STORIES FROM THE ROAD

Emily was just starting her new nursing job at Parkview and was excited to do her best and impress her supervisor. After a couple of weeks, she noticed that some nurses and her supervisor were looking at a patient record and talking quietly. When Emily walked up to see what they were talking about, they quickly closed the Epic record and left the computer station. When Emily asked if they had been looking at a patient's record, her supervisor got defensive and told Emily that "she needed to mind her own business and get back to work." Emily really likes her supervisor and her co-workers, so she was torn about what to do next. She wanted to mention it to someone, but did not want to get in trouble.

Emily decided to do the right thing and submitted an anonymous note to the Compliance Department by using the "Report a Compliance Concern" button on Pulse.



III. OUR COMPLIANCE JOURNEY

A. THE BASICS (continued)

5. Cybersecurity

Cybersecurity means keeping our networks, our computers, our electronic records, our personal devices and our medical equipment and devices safe and secure. As the world becomes more and more digitally connected, keeping our networks and data secure becomes more challenging and even more important. Co-workers play a critical role in keeping our networks and data safe.

One of the most common ways that outside parties try to gain access to our network and data is through “phishing” emails. Phishing emails are typically phony emails posing as a certain person or entity that try to replicate real emails from vendors or others we may know. They usually include a link or an attachment that you are asked to click on. **Never click a link or an attachment in a suspicious looking email, and never provide your log-in ID and password to anyone you do not know or were not expecting to request it.** If you have concerns about a suspicious email or request, please contact the IS Department by phone (260-266-8500) or by forwarding the suspicious email to spam@parkview.com or by clicking the “phishing alert” button in the email.

6. Communication Systems

All communications systems, including e-mail, intranet, Internet, voicemail or paper systems are the property of Parkview Health and are to be used for business purposes only. You should assume that these communications are not private. Additionally, take extra caution when sending confidential information through these systems, especially the Internet since its confidentiality cannot be guaranteed. If sending an email with confidential information to an email outside Parkview, include the words **[Send Secure]** in the subject line (also include the brackets) to ensure the email is sent encrypted. Parkview Health may review intranet, Internet, e-mail and voice messages periodically if we have a business reason to do so or are conducting reviews for quality control purposes.

Please use your best judgment when using the Parkview Health communications systems and do not:

- send harassing, threatening, or obscene messages;
- conduct a personal job search for new jobs outside of Parkview;
- access inappropriate information on the Internet;
- send copyrighted documents that are not authorized for reproduction; or
- conduct non-Parkview Health business.

Abusing Parkview's communications systems or using them for non-business purposes may result in corrective action.



ROAD SIGN

When sending emails that contain confidential information or PHI to individuals outside of Parkview, always use **[Send Secure]** in the subject line of the email.

7. Social Media

Parkview Health recognizes that on-line communication resources such as blogs, social media platforms (Facebook, Instagram, LinkedIn, etc.) web-based discussions forums, and personal websites can be highly effective tools for exchanging information and sources for social interaction. Parkview Health supports the proper use of on-line communications, but reserves the right to take appropriate action to maintain the health system's brand identity, integrity, and reputation and minimize actual or potential legal risks for the health system and protect the privacy of our patients. Photographs or postings that include a Parkview Health patient or make reference to patient care or any other protected health information are prohibited.



STORIES FROM THE ROAD

One morning, Mark had just logged in to his computer and was checking emails. He was alarmed when he saw an email from his bank alerting him that he had been the victim of fraud and needed to immediately contact the bank by clicking the link at the bottom of the email.

Mark could not remember ever getting an email like this from his bank and usually just got text alerts. Also he noticed some of the words in the email were misspelled, and, when he hovered his mouse over the link, it looked like a bunch of random letters and numbers. Mark suspected that this was a phishing email and reported it to spam@parkview.com. He's glad he did because he found out it was a phishing attempt!



III. OUR COMPLIANCE JOURNEY

A. THE BASICS (continued)

8. Health and Safety

Parkview leaders are committed to providing a healthy and safe workplace for all co-workers. It is the philosophy of Parkview Health to manage and conduct our business in a manner that offers maximum protection to each co-worker. Parkview recognizes that the success of our safety and health programs are contingent and dependent upon support from all our co-workers. Parkview Health encourages co-workers to provide comments, information, and assistance where health and safety are concerned and will act appropriately upon the information received. Additionally, Parkview coworkers are required to report any injuries, near misses or other safety/risk issues to the MIDAS event reporting system or to their leaders.

Parkview Health must comply with the federal, state, and local laws, and rules and regulations that promote the protection of health and safety. Parkview Health's Health and Safety policies have been developed to protect co-workers and patients. You should understand how these requirements apply to your specific job responsibilities and seek advice from your leader or Parkview's Quality, Safety, Employee Health or Risk Management Departments whenever you have a question or concern.



It is important for you to advise your leader or the Risk Management Department of any workplace injury or any situation presenting a danger of injury. Co-workers are also required to submit a report via the Midas event reporting system to report unsafe situations, clinical errors, near misses or any other events that put our co-workers, patients or visitors at risk. This information will help us prevent these incidents either from happening or from happening again.

9. Employment Practices and Standards of Behavior

Parkview Health is committed to providing a fair and equal opportunity work environment where everyone is treated with dignity, respect and courtesy. This means:

- **we will not tolerate any unlawful harassment or discrimination** for any reason and expect the same from all of our contractors, vendors and visitors to Parkview Health;
- **we provide equal opportunity for employment;**
- **we compensate and promote our co-workers** in accordance with Parkview Health's policies and procedures; and
- **we provide equitable benefits** to all eligible co-workers.

Parkview Health and its affiliates are equal opportunity employers and do not discriminate against employees or potential employees on the basis of race, color, creed, religion, gender, national origin, sexual orientation, veteran status, marital status, age or disability. We will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities.

Parkview Health is committed to actions and policies to assure fair employment, including equal treatment in hiring, promotion, training, compensation, corrective action plans and termination. Parkview Health conducts mandatory exclusion checks and criminal history checks on all co-workers and vendors.



ROAD SIGN

While co-workers are encouraged to discuss compliance concerns with their leaders, a co-worker is always permitted to directly contact the Compliance Department for help.

10. Civility

Civility means treating others with dignity and respect and acting with regard to other's feelings.

Parkview embraces civility in all of our work environments. Being civil and respectful to co-workers and patients connects us at a personal level. It reflects an attitude developed from deep listening and understanding, cultural and personal sensitivity, and compassion. It honors all the participants in an interaction by creating a safe place to have difficult conversations and leads to an environment of honesty and mutual trust.

Engagement is the result of respectful relationships within an atmosphere of trust. It provides all co-workers with the charge, the parameters, the training and the support to make decisions "on the spot" in the best interest of Parkview Health co-workers and patients. Feedback on work performance or work-related behavior differs from incivility or harassment in that feedback is intended to assist co-workers to improve work performance or their behavior.



III. OUR COMPLIANCE JOURNEY

A. THE BASICS (continued)

11. Disruptive Behavior and Harassment

Disruptive behavior is a negative style of interaction with physicians, co-workers, contractors, patients, family members and visitors. It interferes with patient care, causes distress among staff, affects morale and harms the work environment. Disruptive behavior reduces coworker morale and productivity, compromises the quality and safety of patient care and undermines Parkview Health's culture of safety.

Parkview Health has a zero tolerance policy with respect to individuals engaging in disruptive behavior, any form of harassment, threats or workplace violence. Disruptive behavior includes all forms of sexual harassment and workplace violence. **Specific examples of unacceptable conduct include the following:**

- raised voices, angry outbursts, throwing objects, verbal abuse, abusive treatment of patients, families, or staff;
- making sexual, racially insensitive, degrading or demeaning jokes or comments about co-workers or others;
- passive aggressive behavior such as refusal to work cooperatively, respond to requests or carry out legitimate work tasks;
- inappropriate written communications to others via email, instant messaging, electronic documents, electronic health records or other business software applications;
- discriminatory actions against individuals based on race, color, religion or disability; and
- disruption of meetings.

Parkview Health co-workers have a responsibility to avoid these behaviors. As important, we have a responsibility to model positive behaviors that reflect Parkview Health's core values, and our culture of caring.



12. Impairment and Substance Abuse

Parkview Health's facilities are alcohol and drug-free work environments. Only properly authorized individuals during the course of their job responsibilities may handle pharmaceuticals. Co-workers are expected to perform their responsibilities in a professional manner, free from the effects of alcohol, drugs, or other substances which may hinder job performance or judgment.

Co-workers will not be allowed to work "while under the influence" or "unfit for duty" defined in Parkview Health's "Drug Free Workplace – Chemical Impairment Policy."

Required drug testing is based on reasonable cause of some form of evidence that an individual has engaged in substance abuse. **Reasonable cause may include, but is not limited to:**

- Physical signs of alcohol or drug use;
- Abnormal behavior or impairment such as slurred speech and decreased motor coordination;
- Marked changes in personality or job performance;
- Co-workers driving Parkview owned vehicles or equipment resulting in an accident where there is personal injury to self or others or property damage;
- Discrepancies in drug inventories or related documentation; or
- Failure to follow Parkview Health's policies and procedures related to the waste of narcotics or any other medications.

Impaired co-workers put our patients and other co-workers at risk. Co-workers are expected to report to their leader or to HR any co-worker who they suspect is impaired or has worked while impaired



ROAD SIGN

Impaired co-workers put patients at risk. If you believe one of your co-workers may be impaired, contact your supervisor or the Human Resources Department as soon as possible.



STORIES FROM THE ROAD

Liz has been a surgical recovery nurse for seven years and is always very careful about handling narcotics and using the Pyxis machine when accessing controlled substances. After a long shift, Liz was washing her hands before she went home and noticed that there was a syringe in the bathroom garbage can hidden under some paper towels. Liz immediately informed her supervisor and they carefully collected the syringe and placed it in a safe container. Liz's supervisor called the Drug Diversion Team and was connected with specialists who handle controlled substance matters.

After an investigation, it was discovered that the Pyxis count was off by multiple vials of a specific narcotic and the syringe they found in the trash was one of them. A report to the DEA was required within 24 hours, and it was discovered that another co-worker had been diverting drugs from the Pyxis machine. Liz's fast thinking helped identify the problem early before any patients or co-workers were harmed.



III. OUR COMPLIANCE JOURNEY

A. THE BASICS (continued)

13. Controlled Substances

Parkview Health co-workers routinely have access to prescription drugs, controlled substances, and other medical supplies such as drug samples, multi-dose vials and syringes. These products and substances are highly regulated and should only be administered pursuant to a valid order issued by a physician or advanced practice provider. It is extremely important that these items be handled properly and only by authorized individuals to minimize risk to ourselves and our patients. **If you become aware of the potential diversion of drugs, you should report the incident immediately to your leader, the Pharmacy Compliance Officer at 260-373-3281 or the Compliance Hotline 855-773-0012.**

14. Gifts and Entertainment

Parkview Health co-workers and independent contractors may not accept any cash gifts or cash equivalents (gift cards) from any patient, patient's family, vendor, supplier, patient referral source or other providers. Nominal gifts (coffee cups, pens, food items, etc.) received in the normal course of business from a vendor are generally acceptable. You should not accept significant gifts (more than \$25 value) from outside parties. We all must exercise good judgment when determining the value of gifts.

Reasonable business meals paid for by a vendor are acceptable if the purpose of the meal was to discuss a legitimate business matter and such meals are infrequent. If you are invited to a non-work related event by a vendor (e.g., a concert or a ball game), you may only accept the invitation to attend if you pay for your own ticket to the event or if you make a contribution to the Parkview Foundation in an amount equal to the approximate value of attending the event. Please consult the Standards of Conduct Relating to Vendors for more information.



STORIES FROM THE ROAD

Dr. Jones has started talking to a couple of vendors about a new medical device that he can use in his practice. One of the vendors has invited Dr. Jones and his office manager to join the vendor at an upcoming Indianapolis Colts game to discuss their medical device in more detail and get to know the vendor's local reps. His office manager was concerned and called the Compliance Department for help. They learned that Parkview providers and co-workers may not accept free items from vendors and declined the invitation to the Colts game. This rule is in place so that vendors do not use gifts or other perks to try to get our business when other vendors may offer a better product for Parkview and our patients.

15. Conflicts of Interest

As a Parkview co-worker, leader, provider or contractor, you are required to act in the best interest of Parkview when performing your Parkview work. Situations could arise where you have difficulty acting solely in the best interest of Parkview—this could be a conflict of interest.

A conflict of interest usually occurs when our outside activities or relationships influence (or appear to influence) our ability to make decisions that would be in the best interest of Parkview. For example, if one of your family members owns a business that wants to perform work for Parkview, then you may be conflicted between doing what is best for your family member or what is best for Parkview. In those situations, you need to notify Parkview leadership about the potential conflict of interest and remove yourself from the discussions and decision-making associated with that matter.

Conflicts of interests are not just a concern for the Board of Directors. All co-workers (including providers) need to be cognizant of how our outside roles and relationships could affect our work at Parkview, and we must proactively address any potential conflicts of interest. The Legal and Compliance Departments can help you evaluate if you have a conflict of interest.



III. OUR COMPLIANCE JOURNEY



B. INTERMEDIATE

Additional compliance guidance to keep us on the right path

1. Fraud, Waste and Abuse

Health care costs are rising, and the federal government pays the lion's share of those costs through Medicare and Medicaid. As a result, the government is very focused on reducing fraud, waste and abuse in health care, which lead to higher costs. At Parkview, we are also focused on reducing costs and eliminating fraud, waste and abuse.

Fraud is when someone is intentionally trying to deceive the government or another payor into paying for something that was never provided (e.g., documenting a procedure or service that did not take place). Waste and abuse result from not making sound decisions and unnecessarily drive up the cost of care (e.g., performing extra procedures or services that do not add any clinical value, but add more cost). **Every co-worker at Parkview plays a role in helping to eliminate fraud, waste and abuse.**

2. We Do Not Accept or Make Payments for Referrals

We accept patient referrals/admissions solely based on the patient's clinical needs and our ability to render the requested services. We do not pay or offer to pay anyone — co-workers, physicians, or other persons — for referrals of patients.

Our physicians and other health care providers make patient referrals solely based on the patient's clinical needs and the abilities of the referred provider to render such services. **No co-worker or any other person acting on behalf of Parkview Health is permitted to solicit or receive anything of value, directly, or indirectly, in exchange for the referral of patients.** Similarly, when making patient referrals to another health care provider we do not take into account the volume or value of referrals that the provider has made (or may make) to Parkview Health.

a. Anti-Kickback Statute and the Physician Self-Referral Law

There are two federal laws that place restrictions on referrals between health care providers. The first is the Anti-Kickback Statute, which prohibits any person from offering or receiving anything of value in exchange for referrals. This statute is very broad and prohibits Parkview from giving items of value (e.g., gifts or gift cards) to patients or physicians in exchange for them coming to Parkview or referring their patients to Parkview for care.

The second is the physician self-referral law, better known as the Stark Law, which prohibits entering into financial relationships with referring physicians unless strict rules are met.

b. Financial Arrangements with Physicians

Financial arrangements with physicians are strictly regulated. Never initiate a financial arrangement with a physician without consulting the Legal Department. For example, do not initiate a new medical directorship arrangement with a physician without help from Legal.

3. Accurate Billing for Medically Necessary Services

We will bill the patient's insurance company or the patient for services rendered. We are committed to preparing and submitting honest, accurate and complete patient bills and payer claims that fully comply with the law.

Parkview Health is committed to full compliance with all rules and regulations of government health care programs. Parkview will also comply with the rules and requirements of all commercial insurance programs with which we are contracted. We bill only for services rendered and all claims shall have adequate supporting documentation in the patient's medical record. It is our policy to apply the correct coding using Current Procedural Terminology (CPT), Health Care Finance Administrator Common Procedure Coding System (HCPCS) and International Classification of Disease (ICD-10-CM) coding principles and guidelines and any other regulations that apply when analyzing medical record documentation.



ROAD SIGN

Going to the hospital is like flying on an airplane. You are putting your life in the hands of others, and you want to be sure that they follow the rules and do things right.



We do not:

- bill for items and services not rendered or not medically necessary;
- misrepresent the type or level of service rendered;
- bill for non-covered services unless the patient is informed;
- abuse the use of observation bed status;
- bill for services rendered by other providers, unless contracted to do so; or
- misrepresent a diagnosis to obtain payment.



III. OUR COMPLIANCE JOURNEY

B. INTERMEDIATE (continued)

4. **Correctly Documenting Inpatient vs. Observation Status**

The government has strict rules about when a patient should be listed as an inpatient versus an observation patient (e.g., the Two-Midnight Rule). We must apply those rules carefully to ensure that we document and bill correctly for the patient's status. **We do not list a patient as being an inpatient unless he or she fits the legal criteria for such status.**



ROAD SIGN

Timely and accurate documentation is critical to patient care and compliant billing.

5. Accurate Financial Records and Cost Reports

As a tax-exempt nonprofit corporation, Parkview Health must maintain accurate financial records at all times. Additionally, a substantial portion of our business involves reimbursement under federal and state government programs that require the submission of cost reports. We must adhere to a wide range of legal and regulatory requirements in the preparation of such cost reports. Given the complexity of the cost reporting rules, all issues related to the completion of cost reports must be communicated through or coordinated with Parkview Health's Finance Department.

It is important to stress that the operational units have the primary responsibility of ensuring the accuracy of information reflected on cost reports and in our books and records. It is a violation of this Code to submit a cost report that you know contains false information. **If you know that a cost report contains false information, you should immediately contact Parkview Health's Finance Department or Compliance Department. You are also in violation of this Code if you have any reason to believe that a cost report contains false information, but deliberately fail to report the matter.**

6. False Claims Act – Promptly Repay the Government for Inaccurate Billings

The False Claims Act prohibits the submission of false or inaccurate claims for payment to the government (e.g., Medicare claims). False claims will require Parkview to pay back the value of the claim plus big penalties. In addition, if we identify that a claim is inaccurate after it has already been submitted, then we must voluntarily repay that claim within 60 days of identifying that it was inaccurate or it will be considered a "false claim" and trigger full repayment and penalties.

7. Federal Emergency Medical Treatment and Labor Act (EMTALA)

Because Parkview has numerous emergency departments (EDs), we have special obligations under the Federal Emergency Medical Treatment and Labor Act (EMTALA). Specifically, EMTALA requires us to do the following three things when an individual comes to the ED seeking medical treatment (see the EMTALA Policy on Pulse for a complete description of our obligations):

- (1) **Conduct an appropriate medical screening examination;**
- (2) **Provide necessary stabilizing treatment for an emergency medical condition (including treatment for an unborn child); and**
- (3) **If necessary, make an appropriate transfer to another facility.**

Parkview must perform the above obligations regardless of whether the patient has insurance or otherwise has any ability to pay. Additionally, we must never delay taking the actions above in order to inquire as to the patient's ability to pay.

Failure to abide by EMTALA can result in substantial penalties, including being excluded from the Medicare program. If you have any questions about EMTALA, please contact the Risk Management Department or the Compliance Department for help.

III. OUR COMPLIANCE JOURNEY (continued)



C. ADVANCED Compliance guidance to get us home

1. Environmental Compliance

Parkview complies with all environmental laws and regulations applicable to our business. It is each co-worker's responsibility to understand how our job duties may impact the environment and make sure you follow local, state, and federal environmental laws and regulations, as well as Parkview Health policies and procedures. If you have questions about environmental regulations or the proper handling of hazardous materials, ask your Leader for assistance or contact the Safety Department. Employing prospective planning enables us to respond quickly and effectively to any environmental incidents involving Parkview Health. If you have any questions or comments, please do not hesitate to call the Safety Officer or the Compliance Department.



ROAD SIGN

The antitrust laws do not permit us to share confidential strategic information—especially pricing or wage information—with competitors.

2. Fair Competition and Antitrust Laws

Parkview is committed to fair competition and to remaining in compliance with the antitrust laws. Leaders and co-workers must be careful to avoid any activities or actions that restrict or appear to restrict competition inappropriately. Specifically, we must avoid discussing prohibited subjects with friends or colleagues who work for a competitor, including subject such as pricing for our services, contracted rates with payers, employee wage rates, strategic plans and marketing plans. We must also never work with a competitor to jointly set prices for services or to agree to divide or allocate market areas or customer bases.

At any type of meeting with a competitor, be alert to potential situations where it may not be appropriate for you to participate in discussions. If a competitor raises a prohibited subject, end the conversation immediately. Please contact the Legal Department or the Compliance Department if you have any questions or concerns on these subjects.

3. Lobbying and Political Activity

Parkview Health's political participation is limited by law. Parkview's funds and resources may not be used to contribute to political campaigns or for gifts or payments to any political candidate, party or organization. As private citizens, Parkview Health co-workers may participate in the political process on their own behalf and make personal contributions to political campaigns.

Parkview Health may speak out on issues that impact our business and communities. Parkview's senior management team is responsible for developing our position on legislative and regulatory matters. If there is a legislative issue that you believe Parkview needs to address, please contact a member of senior management, the Chief Legal and Compliance Officer or the Communications Director.

At times, Parkview Health leaders, providers or co-workers may need to contact elected officials, members of the government or lobbying organizations on behalf of Parkview to address health care legislative issues. If you are making these communications on behalf of Parkview, you may be engaging in regulated lobbying activities and must obtain prior approval from the Chief Legal and Compliance Officer.





III. OUR COMPLIANCE JOURNEY

C. ADVANCED (continued)

4. **Complying with our Contracting Policy**

Parkview maintains a comprehensive policy that covers how and when we can enter into contracts. Unless an exception applies, all contracts must be reviewed by the Legal Department or SCORE before they can be signed.

5. **Marketing and Advertising**

Parkview Health markets its services in a fair, truthful, and ethical manner. Marketing materials are designed to reflect only the services available and the level of the provider's licensure and accreditation. Parkview Health uses marketing and advertising to educate the public, report to its communities, increase awareness of its services, and recruit personnel. Please contact the Marketing Department before publishing information about Parkview, including advertisements, social media posts, blogs or articles.

6. **Media Inquiries**

The Communications Director at Parkview Health is responsible for all contact with the media, magazines, trade publications, radio, television, as well as any other external source who is looking for information about Parkview Health. If you have any questions or concerns or if the media contacts you about any topic, contact the Communications Director or your Compliance Representative.





ROAD SIGN

Parkview is a not-for-profit community-owned health system, and we are not permitted to give away money, property or free use of space to for-profit businesses.

7. Innovation and Intellectual Property

Parkview deeply values innovation, which can often lead to the creation of intellectual property such as patents. Generally speaking, intellectual property that Parkview co-workers develop during their workday or using Parkview resources is owned by Parkview. However, Parkview co-workers, leaders and providers who help Parkview generate valuable intellectual property may be able to receive additional compensation or other incentives for their extra efforts. For more information, please see the Intellectual Property Policy, Compliance Department or Legal.

8. Complying with the IRS Tax Exemption Laws

As a non-profit, tax-exempt health system, Parkview must comply with special IRS rules, including being required to provide financial assistance to patients in need. We are also prohibited from doing the following: (1) Giving Parkview property or money to for-profit entities (e.g., giving used IT equipment to a for-profit business); (2) Allowing for-profit businesses to use Parkview facilities at low or no cost; or (3) Using bond financed property for something other than a tax-exempt purpose. If you have questions about the tax exemption rules, please contact Legal or Finance.



III. OUR COMPLIANCE JOURNEY

C. ADVANCED (continued)

9. Exclusions Statute

The Office of Inspector General (OIG) may take action to exclude individuals or providers from participating in the Medicare and Medicaid programs — usually due to past Medicare fraud or similar illegal acts. Health systems are strictly prohibited from having any employees, providers, contractors, vendors or volunteers who are currently excluded by the OIG, and Parkview must run routine checks to see if any person working for or doing business with Parkview has been excluded by the OIG. If you have any questions or concerns about a potential OIG exclusion, please contact the Compliance Department immediately.





10. Clinical Research

One of the important aspects of Parkview's mission is that we conduct extensive clinical research, some of which involves patient volunteers. This research can be truly life changing for our patients. Research, however, is also tightly regulated and requires strict compliance with those regulations to protect our patients. Parkview maintains an Institutional Review Board (IRB) that is responsible for the oversight of all research involving Parkview's patients. Researchers must contact the IRB prior to starting any new research project regardless of whether the research involves live clinical interaction with patients or not. More information can be found on the IRB's website here:

www.parkview.com/institutional-review-board.



ROAD SIGN

Report your compliance concerns—**call the Compliance Hotline at 855-773-0012.**



STORIES FROM THE ROAD

Dr. Ryan was a new doctor at Parkview who was interested in finding innovative ways to treat his patients' diabetes. Dr. Ryan wanted to study the medical records of his patients to identify trends that helped improve their diabetes, and he planned to publish a scientific article based on his chart review findings. Dr. Ryan began reviewing the patient records on his administrative days and on some weekends and began compiling some very interesting findings.

Dr. Ryan was sharing his progress with another physician when he was surprised to learn that he might need to have the Institutional Review Board (IRB) review his work. "Why would the IRB care about a paper I'm writing? I'm not conducting tests on patients," he responded. His colleague reminded him that "Research isn't just when you conduct research directly with patients. Any time you're using patient records and plan to publish your findings, the IRB is required to review and approve your research plan."

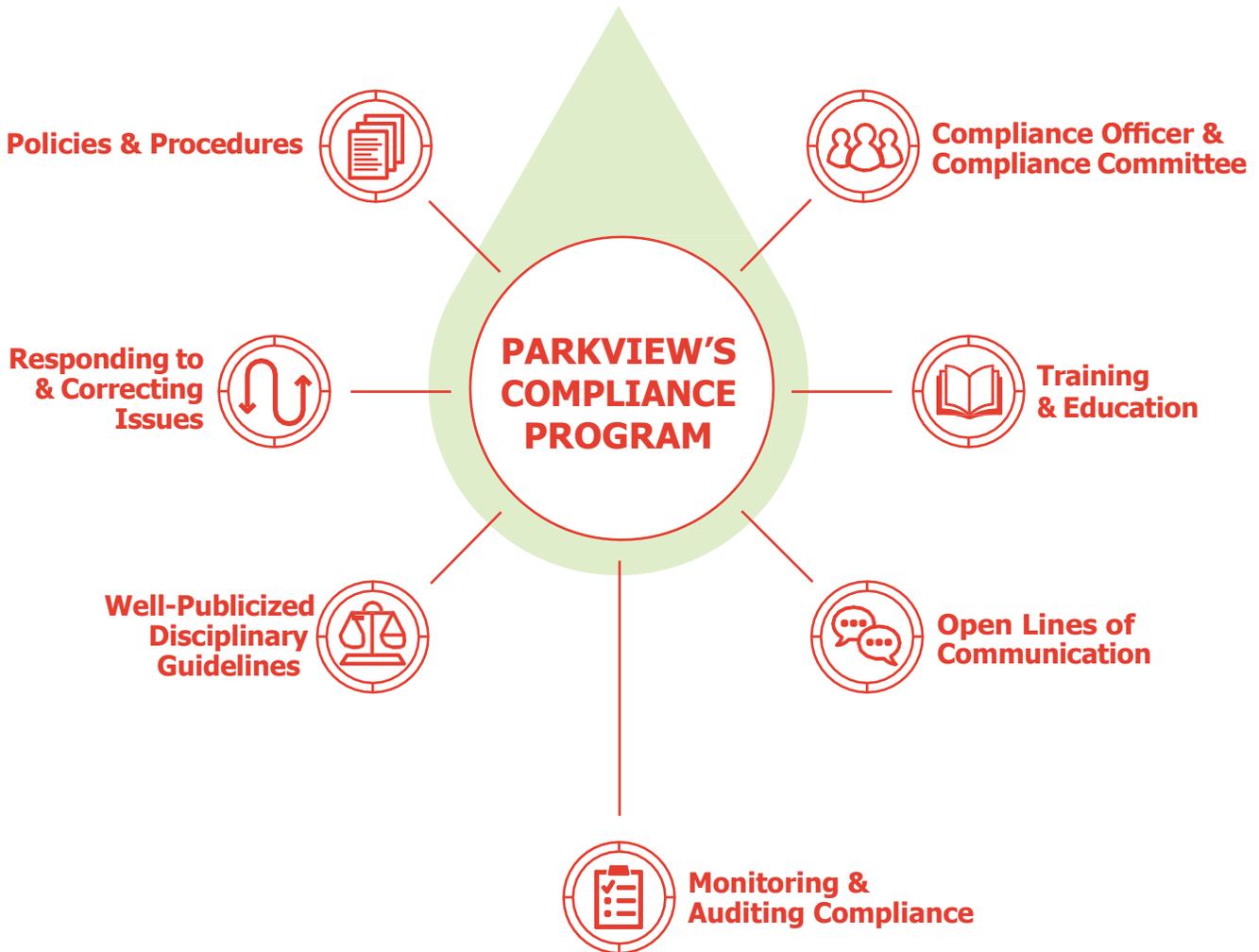
IV. KEEPING THE PATH CLEAR – PARKVIEW’S COMPLIANCE PROGRAM

Parkview has built a robust compliance program to help keep the path clear for our journey. Think of the compliance program like roadside assistance. Compliance helps to identify the potential hazards along the way, gives directions when we don't know the way and assists with any problems that may arise. Parkview has built its compliance program around the seven elements of an effective compliance program laid out by the federal government.



ROAD SIGN

If you can't do it ethically, then it shouldn't be done.





A. The 7 Elements of Parkview's Compliance Program

1. Implementing Written Policies, Procedures and Standards of Conduct

Healthcare is a complex business with countless laws and regulations. To help our leaders and co-workers stay in compliance with these laws and regulations, Parkview has developed an extensive set of compliance policies, procedures, guidelines and standards of conduct. These policies and procedures can be found on Policies and Procedures page on Pulse. They can also be found on the Compliance Department's Pulse page. Please do not hesitate to contact the Compliance Department with any questions about these policies and procedures.

2. Designating a Compliance Officer and Compliance Committee

Parkview has designated both a Chief Compliance Officer and a Corporate Compliance Director who are responsible for overseeing and maintaining Parkview's compliance program. The Chief Compliance Officer can be reached at **260-266-9330** and the Corporate Compliance Director can be reached at **260-266-9347**. You may also contact them via the Compliance Department's general number, which is **260-373-7100**.

Parkview also has a Board Compliance Committee, which provides oversight of the Chief Compliance Officer and is responsible for ensuring that Parkview maintains an active and effective compliance program. Parkview also maintains many compliance subcommittees and work groups who oversee specific areas of compliance. More information on the Compliance Committee, subcommittees and workgroups is on the following pages.

3. Conducting Effective Training and Education

Effective compliance training and education is essential to an effective compliance program. At Parkview, all leaders, providers and co-workers receive mandatory annual compliance training, including an annual review of the Code of Conduct. All new leaders, providers and co-workers also receive a copy of this Code of Conduct and additional compliance training through New Hire and New Leader Orientation. Our Board and Committee members also receive regular compliance training, education and updates. Additionally, targeted and specialized training is provided throughout the year to departments with unique compliance risks or needs.

IV. KEEPING THE PATH CLEAR – PARKVIEW’S COMPLIANCE PROGRAM (continued)

4. **Developing Effective Lines of Communication**

Effective communication forms the foundation of Parkview’s compliance program. Co-workers who have compliance questions or concerns are encouraged to contact their leader, Parkview’s Chief Executive Officer, Parkview’s Chief Compliance Officer or contact the Compliance Department for help. Another easy way to get help is to call the Compliance Hot Line number 855-773-0012 or use the “Report a Compliance Concern” button on the Team Parkview homepage.

While co-workers are encouraged to discuss compliance concerns with their leaders, a co-worker is always permitted to directly contact the Compliance Department for help. Co-workers may remain anonymous when reporting compliance concerns and Parkview will never retaliate against a co-worker for reporting a compliance concern in good faith.

5. **Conducting Internal Monitoring and Auditing**

One of the tools that the Compliance Department utilizes to assess and detect compliance risk is to monitor and audit potential compliance risk areas, including, but not limited to, coding and billing, patient privacy, cybersecurity, controlled substances and provider contracts. Our annual Compliance Plan lays out the numerous audits and monitoring tools that we will use throughout the year to detect compliance risks as early as possible and take appropriate corrective action. Compliance also routinely collaborates with Internal Audit and other departments to complete specialized risk audits.





6. Enforcing Standards Through Well-Publicized Disciplinary Guidelines

The Compliance Department and Human Resources work together to maintain and publicize clearly defined disciplinary guidelines. These guidelines are available on both the Compliance and Human Resources Pulse sites.

7. Responding Promptly to Detected Issues and Taking Corrective Action

The federal government expects health care providers to detect and address compliance issues as promptly as possible. The Compliance Department will investigate all compliance issues that are reported to it and will work with the affected departments to address those issues and take all appropriate corrective action, including repaying the government or other payors for amounts that were inaccurately or inappropriately billed. We will also promptly notify patients of compliance issues that may impact them, including inappropriate use or disclosure of their personal health information.

At Parkview, compliance is everyone's responsibility. The Compliance Department facilitates the review of potential issues but relies on the support and help of all co-workers to ensure that issues are promptly addressed and patients are protected.



STORIES FROM THE ROAD

Dr. Smith has been practicing medicine for a long time and is looking forward to retirement in a few years. Recently, Parkview has been making a push to get all providers to improve their documentation in Epic, but Dr. Smith has refused and does very little documentation in the Epic system. The Compliance Department began working with Dr. Smith on the importance of good documentation and how his documentation could affect the care of his patients, the care provided by other providers who will need to rely on his documentation and the accuracy of bills submitted for the services he provides.

IV. KEEPING THE PATH CLEAR – PARKVIEW’S COMPLIANCE PROGRAM (continued)

B. Parkview’s Compliance Committees

Parkview maintains a Board Compliance and Audit Committee and a series of compliance subcommittees and workgroups that are responsible for compliance oversight.

The Board Compliance and Audit Committee consists of disinterested and independent Board members along with Parkview’s Chief Executive Officer and Chief Compliance Officer. The Board Compliance and Audit Committee has ultimate oversight and responsibility for Parkview Health’s compliance program. The Committee and the Chief Compliance Officer have the full resources of Parkview Health available to them to carry out their responsibilities and to implement the compliance program.

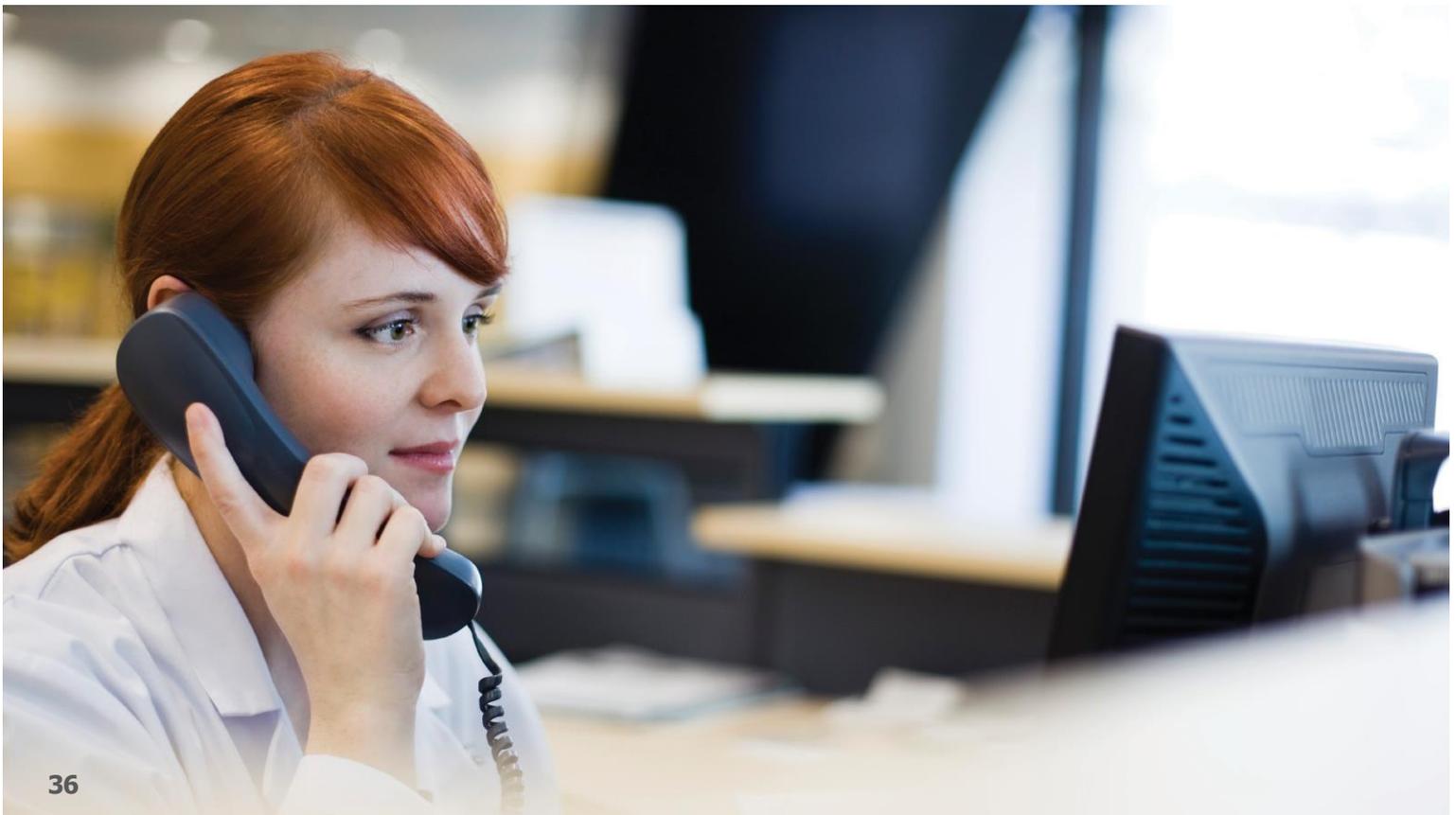
The Board Compliance and Audit Committee has also authorized several compliance subcommittees and work groups to provide specialized oversight of key risk areas. The graphic on the following page is a summary of the current subcommittees and workgroups.



ROAD SIGN

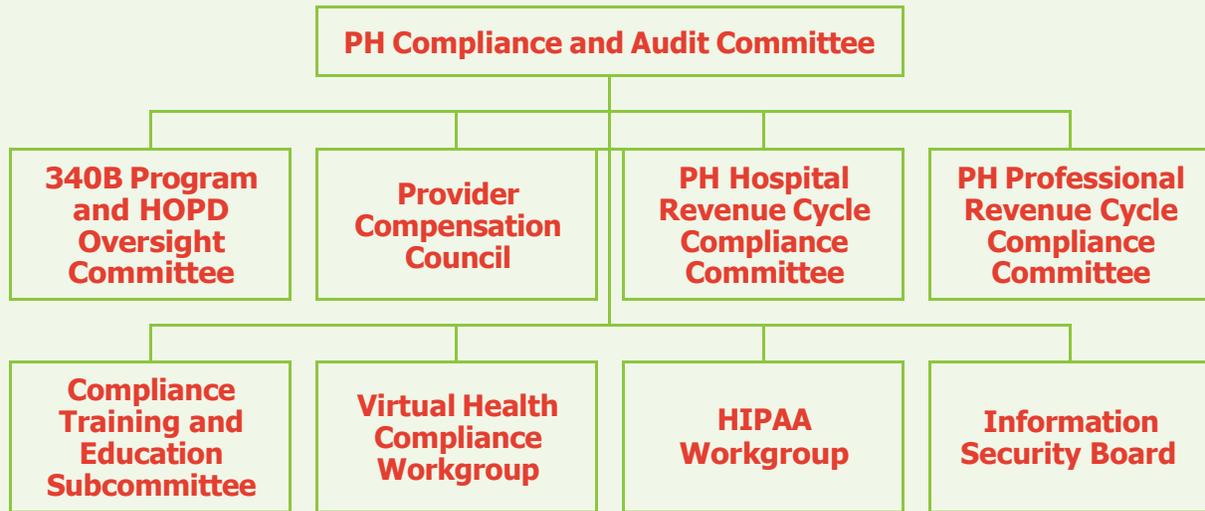
See, Say, Do

If you see a compliance concern, say something about it and do something about it.





PH Compliance Committee and Subcommittees



C. Annual Compliance Planning

Throughout the year, the Compliance Department reviews the OIG's Work Plan, the results of the prior year's audits and the prior year's compliance issues and trends. We also complete a detailed compliance risk assessment taking into account the trends in the foregoing data and industry and enforcement trends. Based on these reviews, the Compliance Department drafts a Compliance Plan for each year. This plan is a helpful roadmap of the areas that Compliance will focus on in the coming year and the specific risk areas to be audited. Leaders and co-workers can obtain a copy of the Plan from Compliance or view the Plan on the Compliance Pulse site.



STORIES FROM THE ROAD

Julie recently completed her new leader training session on compliance and learned some interesting things that she wanted to take back to her department. First, Julie learned that the most important thing that any leader can do to help ensure that the co-workers in her department stay in compliance is to show that compliance is important by **listening to her co-workers' compliance concerns and taking appropriate action when they raise concerns.**

Julie also learned that a simple step that all departments can take to reduce compliance risk is to spend a few minutes each week looking for potential risky activities like unsecured work stations, transporting paper medical records and other risky processes.

Finally, Julie was very happy to learn that the Compliance Department is always available to help when questions or issues arise. They'll even come to department meetings and provide customized trainings—not to mention all of the other resources they have available online.

CONCLUSION AND NEXT STEPS

Now that you have reviewed the Code of Conduct, you should have a good understanding of the rules of the road that will help you stay on the right path, but keep in mind that the Code of Conduct is just the tip of the iceberg. The Compliance Department has many more resources available to help us continue to serve our patients in an ethical and compliant manner on behalf of Parkview. When in doubt, call the Compliance Department at **260-373-7100**, call the Compliance Hotline at **855-773-0012** or visit the Compliance Pulse webpage for lots more information.

Best wishes on a safe, ethical and compliant journey!



