



COMPLIANCE
Code of Conduct

CONTENTS

MESSAGE FROM OUR CHIEF EXECUTIVE OFFICER	3
ABOUT HENDRICK HEALTH SYSTEM.....	4
ABOUT OUR COMPLIANCE PROGRAM	5
CODE OF CONDUCT	6
BUSINESS CONDUCT	6
ACCOUNTING AND BUSINESS RECORDS	7
CODING, BILLING AND FINANCIAL MATTERS	7
SUPPORTING DOCUMENTATION.....	7
RECORDS RETENTION AND DESTRUCTION	7
FRAUD, WASTE AND ABUSE	8
PROHIBITED ACTIVITIES.....	8
MARKETING AND ADVERTISING	8
ANTI-KICKBACK	9
PHYSICIAN ARRANGEMENTS.....	9
LEGAL COMPLIANCE	9
CONFLICTS OF INTEREST.....	10
GIFTS, GRATUITIES, AND ENTERTAINMENT	10
GIFTS TO PHYSICIANS	10
CHARITY CARE AND DISCOUNTS.....	11
FUNDRAISING	11
TRADE REGULATIONS.....	11
PROPRIETARY INFORMATION AND TRADE SECRETS	11
PROCUREMENT	11
NOT-FOR-PROFIT TAX EXEMPTION.....	12
TAXES	12
LOBBYING AND POLITICAL ACTIVITY.....	12
PATIENT SERVICES.....	13
APPROPRIATE CARE AND TREATMENT	13
PATIENT INFORMATION	14
HIPAA PRIVACY RULE	14
HIPAA SECURITY RULE	14
HIPAA COMPLIANCE FOR CONTRACTORS AND VENDORS.....	14
IDENTITY THEFT PREVENTION.....	14
EMERGENCY SERVICES	15
EMPLOYEE RELATIONS	15
EMPLOYMENT STANDARDS	16
NON-DISCRIMINATION AND NON-RETALIATION	16
DUE DILIGENCE AND SCREENING.....	16
FACILITIES	16
NO EXPECTATION OF PRIVACY	16
HAZARDOUS MATERIALS	16
DEALING WITH THE PUBLIC AND OTHER ORGANIZATIONS.....	17
COOPERATION IN GOVERNMENT INVESTIGATIONS	17
NEWS MEDIA AND PUBLIC REQUESTS	17
EMPLOYEE RESPONSIBILITIES	18

MESSAGE FROM OUR CHIEF EXECUTIVE OFFICER

Dear Hendrick Employee:

The mission of Hendrick Health System (Hendrick) is “to deliver high quality healthcare emphasizing excellence and compassion consistent with the healing ministry of Jesus Christ.” As Hendrick employees, we have the responsibility to support and reflect our mission in our delivery of care and how we represent our organization within the hospital system and as a member of our community.

We recognize the importance of building and maintaining a culture of compliance, which incorporates the steps to prevent, detect and respond to compliance concerns. Our compliance program consists of: a code of conduct; Patient-Centered Pledge; a comprehensive compliance plan; an employee handbook; policies and procedures; and an appendix of resources and training materials.

The laws and rules that apply to the delivery of healthcare can be complex and confusing; therefore, we have provided you with this copy of our *Code of Conduct* to serve as a guide and resource for Hendrick’s ethical and legal standards. It is important that you take time to review these materials.

If you have any questions about the Code of Conduct or Hendrick’s Compliance Program, we encourage you to contact our Corporate Compliance Office at 325-670-2915 for further guidance and support. You may also anonymously contact our Compliance Hotline by calling 325-670-7676 or 877-445-7987. A compliance report also may be submitted using the Event Management System.

For Hendrick’s continued success, there must be a dedication to integrity and compliance with standards. We hope you will join us in this commitment.

I appreciate your many contributions and thank you for choosing to work at Hendrick.

A handwritten signature in black ink, appearing to read "Brad Holland". The signature is fluid and cursive, with a large initial "B" and "H".

Brad Holland
President and CEO
Hendrick Health System

Since 1924, Hendrick Medical Center has constantly been there to meet the wide-ranging healthcare needs of the Texas Midwest. From its humble beginnings as West Texas Baptist Sanitarium to today's expansive 500-bed facility, the hospital has grown in size and scope. At the heart of today's campus stands the original five-story building, a nucleus of its earliest brown brick and mortar, around which a steady pattern of growth has matured the facility to ten times its original size. Yet, despite the passing of time and the many changes the years have yielded, the commitment of Hendrick and its staff to our vision, mission and values remain the same.

HENDRICK HEALTH SYSTEM: WHO WE ARE

VISION STATEMENT

Our Vision

To be the leading healthcare provider of choice, in our region and beyond, recognized for enhancing quality, expanding access and excelling in patient engagement.

MISSION STATEMENT

Our Mission – To deliver high quality healthcare emphasizing excellence and compassion consistent with the healing ministry of Jesus Christ.

CORE VALUES

Our Core Values

As employees of Hendrick Medical Center, we work together to fulfill our mission by living these values:

- *Integrity*
Reflect honesty, transparency and trust; do what is right all the time
- *Teamwork*
Value our diverse talents, backgrounds, ideas and experiences to improve outcomes and create solutions
- *Compassion*
Treat patients with dignity, sensitivity and empathy
- *Accountability*
Demonstrate efficient stewardship of our resources that consistently results in quality improvement and outstanding customer service
- *Optimism*
Expect the best possible outcomes while performing responsibilities and interacting with patients, visitors and fellow employees
- *Engagement*
Cultivate an environment of commitment, communication, personal and professional growth, and a shared vision for success

ABOUT OUR COMPLIANCE PROGRAM

Our compliance program is intended to demonstrate Hendrick's absolute commitment to the highest standards of ethics and compliance and to establishing accountability at all levels of the organization. The guiding principles in the Code of Conduct and the Hendrick compliance program create and reinforce a culture of embracing compliance and maintaining our reputation as a leader in providing innovative, comprehensive and quality health care to our patients.

Hendrick has resources to help you understand the expectations related to compliance and to assist you with any issues you might encounter. The following resources are always at your disposal, and we urge you to consult them frequently.

1. **Policies and Procedures** – The Hendrick policies and procedures library can be found on the Hendrick intranet in the policy management system.
2. **Compliance Program** – The Hendrick compliance program, including the detailed Compliance Plan, is overseen by the Hendrick Corporate Compliance Office. The number for that office is 325-670-3177.
3. **Compliance Hotline** – The Hendrick Compliance Hotline number is 325-670-7676. You may call this number any time confidentially report a compliance issue or concern.
4. Additional guidance may be found in the Employee Handbook. The Human Resources office is available to answer your questions. The number for that office is 325-670-3181.
5. **Training** – Hendrick provides training to all employees on a scheduled basis. The Corporate Compliance Office may also be available to provide additional training upon request.
6. **Patient Centered Pledge** – Hendrick has adopted core values that set the overall expectations for conduct and decision making.
7. **Appendix of Resources** – Hendrick maintains an updated Appendix to this Code of Conduct that lists the applicable laws, regulations and Hendrick policies governing these topics. You may use the Appendix of Resources to identify relevant regulations or guidance and find the source materials online. You may also contact the Corporate Compliance Office for further assistance in determining their applicability.
8. Hendrick's commitment to compliance with all applicable laws, rules and regulations applies to everyone at all levels of the organization. As part of the compliance program, Hendrick routinely takes actions to help everyone to comply with legal and ethical requirements, including the following actions:
 - Developing and implementing written policies and procedures;
 - Having an empowered Corporate Compliance Officer;
 - Conducting ongoing education and training programs;
 - Maintaining an organizational structure that supports the compliance program;
 - Conducting ongoing auditing and monitoring activities;
 - Identifying, investigating and responding appropriately to potential compliance issues;
 - Using due diligence to verify that those with whom we do business and employ are compliant;
 - Protecting people who raise compliance issues in good faith from retaliation;
 - Maintaining open channels for reporting compliance concerns; and
 - Reporting results of compliance activities to the governing body and senior leadership.

CODE OF CONDUCT

This Code of Conduct provides the groundwork for each of us to act with the highest level of integrity and in accordance with ethical and legal standards. Compliance is everyone's responsibility at Hendrick. The standards in the Code of Conduct have been developed to demonstrate Hendrick's commitment to honest and ethical conduct, and to provide guidance to employees facing uncertain situations.

The Code of Conduct addresses three categories of conduct that are critical to Hendrick's success: Business Conduct, Patient Services and Employee Relations. The Code of Conduct is not intended to include an exhaustive list of issues facing Hendrick employees, but to illustrate those that are frequently encountered. You will find additional information in the Hendrick policies and procedures library and by making use of the resources available through the Corporate Compliance Office.

BUSINESS CONDUCT

This Section of the Code of Conduct addresses some common standards you are expected to follow at Hendrick. Hendrick encourages you to act in an ethical manner that reflects the faith-based values and mission upon which the organization is based. Hendrick Health System has adopted core values relating to business conduct:

- **Integrity** – Reflect honesty, transparency and trust; do what is right all the time
- **Accountability** – Demonstrate efficient stewardship of our resources that consistently results in quality improvement and outstanding customer service

CODING, BILLING AND FINANCIAL MATTERS

Hendrick takes great care to maintain a high standard of accuracy and completeness with documenting, maintaining and reporting financial information. Hendrick's books and records must not contain any false, misleading or artificial information or entries. Hendrick is committed to ensuring that:

- Billings to the government, third-party payors and patients are accurate and conform with all laws and regulations;
- Patient medical records, billing records, and claims are accurate, complete and accompanied by supporting documentation;
- Financial reports fairly and consistently reflect Hendrick's performance, accurately disclose the results of operations; and
- All memoranda, research reports, expense accounts, time sheets and other documents are accurate and correct.

We create and maintain accurate and complete records. Falsifying records or claims is not tolerated and permanent entries should never be deleted. You should report any intentionally false, inaccurate, or questionable activities immediately to your supervisor or the Corporate Compliance Office.

Each employee has a personal responsibility to ensure that every document, entry and claim is complete and accurate, and that requests for reimbursement or payments are supported the required documentation, by receipts, purchase orders or other records. You are expected to maintain the highest standard of integrity, honesty, and diligence in the performance of these important duties. You should always seek advice from your supervisors if you have questions about any billing, coding, or financial matter.

As part of Hendrick's commitment to compliance, we will periodically review documentation, coding and billing practices and promptly investigate any inaccurate billing to determine if any remedial steps are necessary.

SUPPORTING DOCUMENTATION

Clinical and billing documents and records must be comprehensive and accurate. Patient medical records and other clinical records should be sufficiently detailed to demonstrate that the patient was properly enrolled or eligible to bill a third-party payor, that all health care services were medically necessary and that all billed services were rendered as claimed.

RECORDS RETENTION AND DESTRUCTION

We are required to retain all records for minimum time periods as defined by state and federal laws, regulation, or policies. We only destroy organizational records in accordance with policy or under the direction of the Corporate Compliance Office, after receiving written approval in advance.

FRAUD, WASTE AND ABUSE

Hendrick's policy is to maintain honest and accurate records concerning the provision of health care services, to submit accurate claims and to never offer, pay, solicit, or receive any money, gifts or services in return for the referral of patients or to induce the purchase of items or services.

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

PROHIBITED ACTIVITIES

Examples of practices which may be considered fraudulent or abusive include:

- Claiming reimbursement for items or services that were not rendered or provided as claimed;
- Submitting claims for equipment, medical supplies or services that are not medically necessary;
- Knowingly billing for inadequate or substandard care;
- Providing misleading information about a patient's medical condition;
- Upcoding the level of service provided;
- Forging physician or beneficiary signatures on documents used to verify that services were ordered and provided;
- Failing to maintain sufficient documentation to establish that the services were ordered and performed;
- Falsely certifying that services were medically necessary;
- Falsely certifying that an individual meets the Medicare requirements for home health (or any other) services;
- Offering or transferring money, gifts, or other items of value to a patient or prospective patient to influence him or her to order or receive services or items from Hendrick.

MARKETING AND ADVERTISING

Hendrick's marketing and advertising programs will reflect truth in advertising and be consistent with Hendrick's ethical standards. All advertising and marketing communications should comply with the patient privacy regulations and laws related to marketing and solicitation. Advertising and marketing campaigns should be reviewed by the Hendrick Marketing Department and, as necessary, reviewed by the Corporate Compliance Office.

ANTI-KICKBACK

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. Hendrick's legal counsel must review all agreements involving referral sources, including physicians, hospitals, labs, suppliers, ambulance services, managed care organizations and other health care organizations or service providers. Examples of violations include:

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

PHYSICIAN ARRANGEMENTS

The Stark law prohibits referrals for certain designated health services if the referral comes from a physician in certain types of relationship with the hospital. Hendrick's legal counsel evaluates the following types of physician arrangements to ensure they comply with all applicable laws: medical directorships and other administrative service arrangements, professional services, emergency call coverage, recruitment, managed care payments, facility and equipment leases, loans and lines of credit, physician recruitment and other transactions.

LEGAL COMPLIANCE

Hendrick endeavors to conduct its business in accordance with the spirit and letter of all applicable laws and regulations. The Corporate Compliance Office is available to assist you in understanding the laws and regulations that apply to your duties. Hendrick's Policies and Procedures and Appendix of Resources are other valuable sources of information. You are expected to have or promptly obtain practical, working knowledge of the laws and regulations applicable to your job responsibilities. You are required to report to the Corporate Compliance Office or the Compliance Hotline any suspected violations of applicable laws and regulations.

Hendrick employees, directors and health care providers must avoid situations in which their personal interests are in conflict, or reasonably appear to be in conflict with, the interests of Hendrick. Potential conflicts of interest can arise in a variety of situations and can take many shapes, including consulting and speaking arrangements, vendor and industry interactions, purchasing decisions, investments and outside positions. Disclosures of potential and actual conflicts of interest help us to ensure that our decisions are free from inappropriate influences.

As part of Hendrick's Conflicts of Interest Policy, you are required to:

- Report to the Corporate Compliance Office any actual or potential conflicts of interest that arise during the year;
- Disclose to the Corporate Compliance Office and obtain approval for any material ownership or financial interest, or employment or management position, held by you or your family member(s) in an outside business entity from which Hendrick makes or receives patient referrals or purchases goods or services;
- Refrain from using any Hendrick equipment, supplies or information for personal use or in connection with any outside business activities;
- Disclose to the Corporate Compliance Office and obtain approval for any personal relationships and business activities with contractor personnel or referral sources or referral recipients that may be construed by an impartial observer as influencing your performance of duties; and
- Disclose to the Corporate Compliance Office and obtain approval before performing work or rendering services for any supplier or potential supplier of Hendrick outside the normal course of your job duties.

GIFTS, GRATUITIES AND ENTERTAINMENT

Hendrick will not use gifts or other incentives to improperly influence relationships or business outcomes. Accepting and offering gifts of any kind may raise significant legal and ethical issues. You may accept unsolicited gifts or honoraria from Hendrick patients, their families, clients, vendors or from other individuals or entities if those gifts have an aggregate value of twenty-five dollars (\$25) or less in any calendar year. No gifts should be accepted from direct competitors.

In accordance with Human Resources policy Acceptance of Gifts and Honoraria, you must consult with Pay Administrator, the President or the President's designee and obtain advance written approval before engaging in any of the following activities:

- Accepting honoraria or other fees for speaking engagements;
- Attending workshops, seminars, or training sessions provided by suppliers, contractors, vendors, or other entities engaged in business with Hendrick; or
- Accepting unsolicited gifts of a value greater than twenty-five dollars aggregate in any calendar year from patients, their families, clients, vendors, or other individuals or entities.

GIFTS TO PHYSICIANS

No Hendrick employee, director, officer, trustee, or agent may offer, give, or grant any gift, item, or service to any physician or to a physician's immediate family member except as allowed by the Stark Law's safe harbor regulations and Hendrick policies and procedures. You must consult with the Corporate Compliance Office prior to giving any such gifts.

CHARITY CARE AND DISCOUNTS

As part of the Hendrick Charity Care and Discounts Policy, we may provide services that are medically necessary regardless of ability to pay. Hendrick will not grant any routine discounts or waivers to patients based on their relationship with Hendrick physicians, officers, or directors.

FUNDRAISING

Hendrick's fundraising efforts enable us to provide needed services. Without the generous support of our donors, we could not accomplish our Mission. All fundraising activities must be coordinated through the Hendrick Medical Center Foundation. Contact the Foundation at 325-670-2204 if you are approached by an individual wishing to make a donation to Hendrick Health System.

TRADE REGULATIONS

PROPRIETARY INFORMATION AND TRADE SECRETS

In your work at Hendrick, you will come across a variety of confidential information about Hendrick employees, patients, vendors, or Hendrick's strategies and operations. It is your duty to take appropriate measures to maintain the confidentiality of this information.

You may not share confidential information with other individuals or entities unless there is a legitimate business need for the other individual or entity to know the information to perform a specific job duty or to carry out a business contract and the disclosure is not prohibited by law or regulation. You should use due care and diligence when discussing business relationships because such disclosures could have antitrust implications. If in doubt, please consult with the Corporate Compliance Office.

PROCUREMENT

If you are involved in evaluating, negotiating, or awarding contracts to vendors or if you have access to information involving these processes, be aware that this is a confidential process subject to regulations. You are expected to follow these requirements:

- Do not engage in price fixing, bid rigging or allocation of customers or markets;
- Do not discuss with any competitor the prices, terms or conditions of sale, where Hendrick intends to sell or bid, to whom Hendrick intends to sell or bid, or whether, or at what price, Hendrick 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 the Corporate Compliance Office; and
- 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.

Hendrick is a not-for-profit tax exempt organization under the Internal Revenue Code. Consequently, we are not organized or operated for the benefit of private interests, and no organizational earnings may financially benefit any private individual. Our assets and resources should not be used for any purposes other than those that meet Hendrick's not-for-profit mission. Hendrick's assets and resources may include funds, time, personnel, facilities, materials and proprietary information.

TAXES

Hendrick, its employees, and other disqualified persons must avoid compensation or benefits that exceed the market value of the goods or services they have provided. Hendrick must also accurately report payments to appropriate taxing authorities, comply with all requirements of non-profit entities and file all tax and information returns according to applicable laws.

LOBBYING AND POLITICAL ACTIVITY

Hendrick is prohibited from directly or indirectly participating in, or intervening in, any political campaign on behalf of or in opposition to any candidate for public office, including support through or by a political action committee. Hendrick will not, as a substantial part of its activities, attempt to influence legislation.

You may participate in political activities in your individual capacity as long as you do so on your own time, using your own resources, outside the premises of any Hendrick facility, and do not identify yourself as a Hendrick employee or representative. You may not agree to contribute any money, property, or services of any officer or employee at Hendrick's expense, or on behalf of Hendrick, to any political candidate, party, organization, committee, or person.

Any attempt to influence the decision-making process of a government representative by an improper offer of any benefit is prohibited. Any requests or demands by any government representative for any improper benefit should be immediately reported to the Corporate Compliance Office.

This Section of the Code of Conduct addresses the standards we use in caring for our patients and their families. Hendrick encourages you to embody our mission of emphasizing excellence and compassion in the delivery of high quality health care. Hendrick Health System has adopted the Patient Centered Pledge relating to patients.

PATIENT-CENTERED PLEDGE

We are a team that is always patient-centered. Therefore, we pledge to our patients, families, physicians and co-workers to:

- **Communicate** – Share and receive meaningful information
- **Support** – Stand up, educate other and lend a voice
- **Unite** – work together for a common purpose
- **Be Professional** – Maintain high standards and respect for myself and others
- **Take Ownership** – Understand how my role contributes to our organization and community

TO ACHIEVE:

- **Safety – Protect others by following best practices and policies**
- **Quality – Perform with consistency and accuracy for the best possible outcome**
- **Excellence – Demonstrate improvement and outstanding customer service**

TO UPHOLD OUR MISSION STATEMENT:

“To deliver high quality healthcare emphasizing excellence and compassion consistent with the healing ministry of Jesus Christ.”

APPROPRIATE CARE AND TREATMENT

We must always treat patients and families with dignity, respect and courtesy. We should not make any distinctions in the care we provide or proposed courses of action based on race, color, religion, sex, sexual orientation or marital status. All patients are provided with service and care that is medically necessary and appropriate. All clinical decisions are based upon identified health care needs.

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

Compassion and care are part of our commitment to the communities we serve. We strive to provide health education, health promotion and illness prevention programs as part of our efforts to improve the quality of life of our patients and our communities. Customer service to our patients is a systemwide initiative.

Patients are treated at all times with care, concern and respect. Patients are entitled to prompt and courteous responses to their requests and to their needs for treatment or service. Care is provided in an efficient as possible manner, consistent with our obligation to maintain quality.

Health information created in the course of clinical treatment is considered confidential. The medical record should be safeguarded against loss, tampering and unauthorized uses and disclosures. You may come into possession or gain access to a broad range of confidential, sensitive, or privileged information, and you have the duty and obligation to actively protect and safeguard such information.

HIPAA PRIVACY RULE

In the course of our activities, we gather protected health information (PHI) from patients that must be treated with the highest degree of confidentiality. In order to facilitate open and honest communication with our patients, they must trust that we take all precautions reasonably necessary to protect this sensitive information. We are committed to maintaining this confidentiality and to complying with HIPAA and Texas Medical Records Privacy Act requirements. No PHI should be revealed to anyone outside Hendrick without the express permission of the patient or his or her legal guardian for a legally recognized and appropriate use. All conversations related to patients must be conducted privately and discreetly and on a need-to-know basis with only those individuals authorized to have access to the information. Patient privacy laws apply to past, present and future health of patients and the laws extend to Hendrick as an organization and to our employees and health care providers even after they leave Hendrick.

HIPAA SECURITY RULE

Hendrick takes reasonable measures to ensure the physical security of all PHI, including the use of password protection, encryption of transferred information, restrictions of unauthorized software, limited accessibility and guidelines for maintaining paper documentation and storage. In the event of any improper exposure of PHI, immediately report this to the Corporate Compliance Office or our Compliance Hotline. This will allow us to notify all appropriate state and federal agencies, as well as to conduct our own investigation.

HIPAA COMPLIANCE FOR CONTRACTORS AND VENDORS

All contractors and vendors conducting business on behalf of Hendrick must adhere to the same privacy and security laws and regulations. All contractors and vendors are required to have their own compliance program in place and are expected to be in full compliance with the standards set forth in Hendrick's Code of Conduct and HIPAA Business Associate Agreements.

IDENTITY THEFT PREVENTION

Medical identity theft occurs when a person uses someone else's name or other parts of their identity, without permission, to obtain medical care or receive payment for care or medical supplies. You should be alert for reports from patients, their relatives, law enforcement officials, or other individuals indicating that a patient has received an invoice for an item or service that was not received or has been declined insurance coverage due to a condition that the patient did not have. If this occurs, gather as much detailed information as possible and report the event to the Corporate Compliance Office.

EMERGENCY SERVICES

Any person who comes to the Emergency Department and requests examination or treatment for a medical condition, regardless of his or her ability to pay, is provided an appropriate medical screening examination to determine whether an emergency medical condition exists. Emergency medical conditions include active labor. If it is determined that an emergency medical condition exists, the patient must receive a further medical evaluation and Hendrick must provide such treatment, within the capability of the Emergency Department, as necessary to stabilize the medical condition or arrange appropriate transfer of the patient to another medical facility.

EMPLOYEE RELATIONS

This Section of the Code of Conduct addresses some of the expectations we have of you as an employee. Additional information is found in the Employee Handbook, particularly in the chapters on “Employment” and “Performance.” Hendrick encourages you to demonstrate our value of teamwork, in which we recognize that everyone achieves more when we work together. The Core Values and Patient Centered Pledge apply to everyone you interact with as an employee.

NON-DISCRIMINATION AND NON-RETALIATION

Hendrick is committed to providing equal employment opportunities without regard to race, color, religion, gender, national origin, age, disability, military status, or any other classification prohibited by law. Hendrick is dedicated to ensuring that all decisions regarding terms and conditions of employment, including hiring, placement, training, promotions, transfers, leaves of absence, discipline, layoff, recall and termination are in accordance with all federal and state laws prohibiting discrimination.

In order for Hendrick to have a robust and effective compliance program, it is important for you to feel comfortable asking questions. You should use the Code of Conduct as a guide if you are confronted with a situation that raises concerns. If you ever think a law, policy, rule or our Code of Conduct is not being followed, you should report that concern to the Hendrick Corporate Compliance Office or the Compliance Hotline.

Hendrick has a non-retaliation policy which provides that no one is punished for making a good faith report, where the person honestly believed a compliance concern existed. No adverse actions will be taken against any employee for making a report or cooperating with a compliance investigation in good faith.

DUE DILIGENCE AND SCREENING

Hendrick does not hire physicians, providers, or other employees or contract with, or bill for services rendered by, individuals or organizations that have been excluded from participation in federal or state health care programs. Hendrick regularly screens for individuals who have been excluded, have a history of certain criminal convictions, have lost or terminated any professional licensure or certification required to perform their job duties, or have been included on any state misconduct registry. You are required to inform the Corporate Compliance Office if any of these events happens to you at any time during your employment.

FACILITIES

NO EXPECTATION OF PRIVACY

Although the Employee Handbook allows you to use your work computer and telephone for incidental personal use, you have no reasonable expectation of privacy regarding any communication or data going through or stored on any Hendrick information system, computer, or device. Any such information, as well as all items or other property stored in offices, shared spaces, desks and lockers on the Hendrick premises, are subject to inspection, review, or examination.

HAZARDOUS MATERIALS

Hendrick maintains a safe and healthy working environment. You must conduct yourself in a manner that minimizes potential health and safety hazards, obtain the proper training for disposing of waste or operating certain equipment and notify your supervisor immediately of any actual or potential unsafe working conditions or practices.

COOPERATION IN GOVERNMENT INVESTIGATIONS

The policy of Hendrick is to cooperate reasonably with government inquiries, investigations and audits and to respond promptly and appropriately to governmental requests for information. Hendrick employees will not conceal, destroy or alter any requested record or document, or make any false or misleading statement to a government representative.

You should not provide information about patients, providers, or employees to anyone unless you have been instructed to do so by your supervisor. If you are asked to accept or sign a subpoena, summons or warrant or share information of any kind with a government representative concerning Hendrick business, you should immediately notify your supervisor or a member of Administration by work phone, cell phone, or any other method. If you are unable to reach them, contact Administration and ask them to send a Hendrick officer with decision-making authority to your location immediately. After contacting an appropriate Hendrick officer, escort the governmental representative to a conference room away from patient and work areas to wait. Only formally designated employees are permitted to speak on behalf of Hendrick.

NEWS MEDIA AND PUBLIC REQUESTS

If you are contacted by a member of the news media or member of the public for information or commentary on any investigation or other situation involving a Hendrick employee, contractor, or patient, you must immediately contact the Marketing Department and they will address the situation appropriately. Do not make a statement or comment.

EMPLOYEE RESPONSIBILITIES

In order for Hendrick to have a robust and effective compliance program, it is essential that you adhere to the Code of Conduct and the compliance program. Specifically, we expect you to:

- Take responsibility for your own actions;
- Know and comply with applicable laws and rules, including applicable Federal health care program requirements, the Code of Conduct, Hendrick policies and procedures, Employee Handbook, Patient Centered Pledge, Core Values, training materials and Appendix of Resources as they apply to your job responsibilities;
- Attend all required compliance training sessions;
- Seek guidance as provided in the Code of Conduct and other Hendrick compliance program materials when in doubt about your responsibilities;
- Avoid inappropriate, illegal, or unethical behavior and be alert to the actions of others;
- Promptly report any potential or suspected violation as provided in the Code of Conduct and other Hendrick compliance program materials; and
- When requested, assist Hendrick personnel and other authorized persons in investigating all allegations of violations.

Remember that no issue pertaining to the Code of Conduct is too small or unimportant. If you have questions, you are encouraged to discuss them with your supervisor, or the Corporate Compliance Office. If at any time you think a law, policy, rule or our Code of Conduct is not being followed, you must report that concern to the Corporate Compliance Office by calling 325-670-3177 or by calling the confidential Compliance Hotline at 325-670-7676 or 877-445-7987. Be aware that if you file an anonymous report, however, the Corporate Compliance Office will not be able to contact you for further information if needed.

With your cooperation and assistance, we can accomplish Hendrick's Vision to be the leading healthcare provider of choice, in our region and beyond, recognized for enhancing quality, expanding access and excelling in patient engagement. We are proud of this Vision and we appreciate your efforts in ensuring its success.

