

Code of Ethical Business Conduct

 **MEMORIAL**

Family of Services



A Message from the Memorial Family of Services CEO

The Memorial Family of Services has a long-standing reputation for its commitment to the community and excellence in patient care. As part of our continuing pledge, these standards of conduct have been prepared. They are intended to ensure that every employee, manager, director, medical staff member, trustee, vendor, student, instructor and volunteer of Yakima Valley Memorial Hospital, Memorial Physicians, and our Family of Services, has a clear understanding of the ethical behavior expected in our workplace.

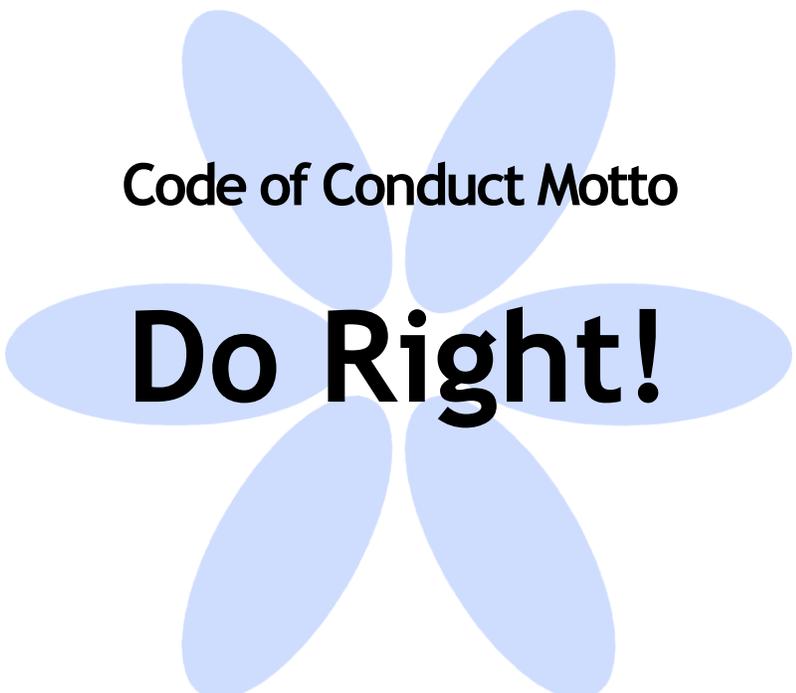
These standards provide general guidelines and are intended to complement, not replace, operational policies and procedures and the use of common sense and sound professional judgment.

I am confident that *we are a group of honor bound individuals whose moral code dictates we do right!*

I believe you will do all in your power to meet these ethical business standards.

Memorial's reputation is in your hands.

Russ Myers
Memorial Family of Services President & CEO



Code of Conduct Motto

Do Right!

Our Mission: Improve the Health of Those We Serve

Our Vision: We create the healthcare experience of choice...every time!

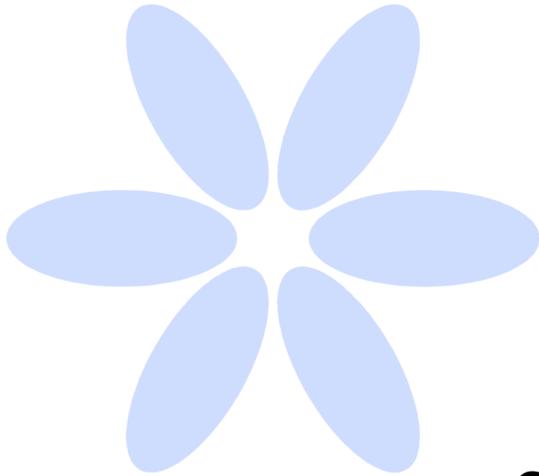
Our Values: Respect, Compassion, Accountability, Safety, Teamwork, Excellence

Please Note:

-  Employees, at time of hire, agree (*per their signed application*) to conform to the standards of conduct and performance and the personnel policies of the organization, which standards and policies may be unilaterally amended by this facility from time to time.
-  The Code of Ethical Business Conduct applies to employees, managers, directors, medical staff members, trustees, vendors, students, instructors and volunteers of Yakima Valley Memorial Hospital, Memorial Physicians, and our Family of Services, as applicable.
-  The term “Memorial Family of Services” or “Memorial” as used within the Code of Conduct, refers to Yakima Valley Memorial Hospital, Memorial Physicians, and our Family of Services.
-  The current version of the Ethical Code of Business Conduct, with modifications as applicable, is posted on the Memorial Intranet.

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Our Mission

Improve the Health of Those We Serve

Our Vision

We create the healthcare experience
of choice...*every time!*

Our Values

Respect

Compassion

Accountability

Safety

Teamwork

Excellence

Into the Blue

Our Mission: Improve the Health of Those We Serve

Our Vision: We create the healthcare experience of choice...every time!

Our Values: Respect, Compassion, Accountability, Safety, Teamwork, Excellence



Our Values Defined

Respect: Recognizing our differences as strengths, affirming each other, and valuing each other's contributions.

- I communicate constructively and in a civil manner (verbally & non-verbally).
- I treat everyone as equals.
- I actively listen/acknowledge issues and concerns.
- I speak directly to the person(s) involved.
- I speak positively of others and our organization.

Compassion: Listening, anticipating, being attentive and perspective shifting so others feel cared for and understood.

- I maintain confidentiality.
- I actively listen and observe without prejudice.
- I offer help and ensure needs are met promptly.
- I convey a caring attitude.
- I maintain eye contact, physical proximity, appropriate touch and tone of voice.

Accountability: Taking responsibility for our actions, being trustworthy and demonstrating integrity.

- I speak the truth and encourage honesty.
- I do what I say I will do.
- I follow the policies and procedures of the organization.
- I demonstrate competence.
- I complete tasks assigned to me on time.

Safety: Taking responsibility for myself and others to practice tools to ensure safety for all.

- I intervene when others are at risk or safety is jeopardized.
- I take immediate ownership of issues.
- I ask questions and seek clarification.
- I provide timely and constructive feedback to others.
- I use mistakes as learning opportunities.

Teamwork: Healthcare is best delivered by a team working together, sharing unique talents, perspectives, ideas and efforts to achieve our Vision.

- I fulfill my roles/responsibilities.
- I share information/knowledge and resources.
- I support my team members.
- I offer, ask for, and accept help when appropriate.
- I freely acknowledge and praise others for their contributions.

Excellence: Implementing best practice; being creative, innovative, and flexible; and setting and achieving bold goals.

- I demonstrate accuracy in my work.
- I define/identify and implement best practices.
- I provide extraordinary service to others.
- I show flexibility in difficult situations.
- I communicate clearly.

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Purpose of the Code of Conduct

The purpose of the Code of Conduct is to clearly state the legal and ethical issues as well as individual expectations which affect the activities of every employee, manager, director, medical staff member, trustee, vendor, student, instructor and volunteer of the Memorial Family of Services. This code reflects our commitment to conducting business using sound ethical standards.

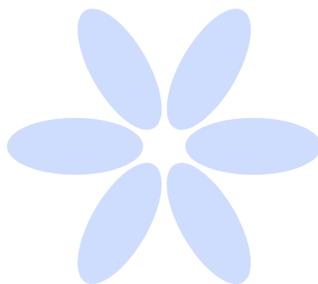
This code is neither a contract nor a comprehensive manual that covers every situation one might encounter. It is a guide that emphasizes the expectation that we go beyond the legal minimums by describing the ethical values we share at Memorial.

Management and Individual Responsibility

We are each responsible for the ethical quality and the reputation of the Memorial Family of Services.

Every individual employee, manager, director, medical staff member, trustee, vendor, student, instructor and volunteer of Yakima Valley Memorial Hospital, Memorial Physicians, and our Family of Services, is personally responsible for following this code and seeking help when needed to avoid unethical or illegal business conduct.

Everyone in management assumes responsibility for ensuring compliance with this code by others. Managers have the additional responsibility of providing leadership through words and actions. Managers are diligent in looking for indications that unethical or illegal conduct has occurred and create an environment where open, honest two-way communication is encouraged.



I. Maintain High Quality of Service

Memorial Family of Services is committed to providing excellent care and service to all of our customers regardless of race, nationality, age, religion, creed, disability, gender, sexual orientation, marital status, or financial ability. We believe that everyone is entitled to be treated with dignity. Our healthcare professionals are bound by quality of care standards.

A. Professional Services

Professional services are rendered only when medically necessary, and are properly supported, authorized and documented by the appropriate healthcare professional.

Healthcare managers monitor compliance with standards of care on a consistent basis. Periodic reviews are performed.

B. Respect for the Rights of Patients

Patients have access to written copies of their rights and responsibilities, at the time of admission, prior to service being rendered or upon request.

II. Maintain Compliance with Laws and Regulations

We operate in a highly regulated environment, and monitor compliance with many complex federal and state laws and regulations. Among other purposes, these laws and regulations are intended to prevent and detect fraud, waste, and abuse in the health care field. It is essential that employees, managers, directors, medical staff members, trustees, vendors, students, instructors and volunteers of Yakima Valley Memorial Hospital, Memorial Physicians, and our Family of Services, abide by state and federal law as well as bring potential violations to light in order to ensure the organization's compliance. For more information on laws related to your specific work responsibilities, you may: (1) refer to your departmental compliance policy; (2) speak to your supervisor or manager; (3) contact a member of the Corporate Compliance Committee or the Business Conduct Committee; or, (4) call the confidential Ethics/HIPAA/Privacy Line. The following list identifies a few of the many laws which are intended to prevent and detect fraud, waste, and abuse in Federal health care programs:

A. Preventing and Detecting Fraud, Waste and Abuse

A number of federal and state laws are designed to prevent and detect fraud, waste and abuse in government health care programs and impose liability on any person or entity that submits a claim to the federal government that is known (or should have known) to be false. An example may be a physician who submits a bill to Medicare for medical services that were knowingly not provided. These laws also provide protection for those who report concerns about violations of the law. For detailed information, please refer to the following resources:

Federal False Claims Act (31 U.S.C §§ 3729-3733)

http://www.justice.gov/civil/docs_forms/C-FRAUDS_FCA_Primer.pdf

Washington Medicaid False Claims Act (RCW 74.66)

<http://apps.leg.wa.gov/rcw/default.aspx?cite=74.66>

B. Federal False Claims Act

It is a federal crime to submit a fraudulent claim to the U.S. government. Health care professionals and entities are prohibited from presenting claims for services that the individual or entity “knows or should know” were not provided as claimed. An individual or entity found liable for a violation can be assessed a fine of \$5,000 to \$10,000 plus triple damages for each infraction.

C. Anti-Kickback Law

Health care professionals and entities are prohibited from paying directly or indirectly for referrals. Referrals can refer to hospital admissions or any type of outpatient activity. Payment is defined as any type of cash payment or promise of payment or payment in kind.

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D. Stark Self-Referral Laws

These laws prohibit physicians and their immediate family members from having ownership or compensation arrangements with certain health services to which they refer.

E. Health Insurance Portability and Accountability Act (HIPAA)

HIPAA requires health care providers to maintain confidentiality over patient information and to not disclose it except under certain very restrictive circumstances.

F. State of Washington Law

Most of the above federal laws have state law which mirrors the federal law. Therefore, specific violations can be a breach of both federal and state law.

G. Whistleblower Protection

Both state and federal law protects employee whistleblowers from harassment, demotion, and wrongful termination. Lawsuits brought by individuals under the False Claims Act are known as *qui tam* cases. Whistleblower protection is also provided to anyone who investigates, testifies, initiates, or assists in a *qui tam* lawsuit.

It is Memorial Family of Services intent to abide by all laws which affect our entity. It is critical that employees who have knowledge of violations bring their concerns to the attention of the manager/supervisor, the Corporate Compliance Committee, the Business Conduct Committee, or the confidential Ethics/HIPAA/Privacy Line.

The Memorial Family of Services policy is to not knowingly hire or contract with an employee, physician, or vendor who is prohibited from billing under the Medicare and/or Medicaid program.

III. Protect and Properly Use Memorial Assets and Information

Everything that belongs to Memorial Family of Services is used only for Memorial Family of Services business.

A. Conflict of Interest

Disclose conflicts of interest: situations where our personal interests, or the interests of 3rd parties, could conflict or appear to conflict with the interests of Yakima Valley Memorial Hospital, Memorial Physicians, and our Family of Services. A conflict of interest occurs whenever we permit the prospect of personal gain to improperly influence our business judgment. A person having a conflict of interest is not in a decision-making capacity with respect to the conflict.

B. Use of Memorial Funds and Assets

Use Memorial Family of Services property only for business purposes, and only to benefit Memorial.

C. Proper Accounting

Ensure that Memorial Family of Services payments and transactions are properly authorized by management, and are accurately and completely recorded according to established policies and accepted accounting practices.

D. Accuracy of Records

Ensure that recording and reporting of information is done in the most honest and accurate manner. This includes all financial, patient, quality, safety, and personnel records. Avoid false or artificial entries. Avoid exaggeration, colorful language, guesswork, legal conclusions, and derogatory remarks or characterizations of people, business and community partners and Memorial.

E. Protect and Safeguard the Confidentiality of Information Gained as an Employee, Manager, Director, Medical Staff Member, Trustee, Vendor, Student, Instructor or Volunteer of the Memorial Family of Services.

- Personal Health Information (PHI)
- Yakima Valley Memorial Hospital, Memorial Physicians, and our Family of Services Information

Use PHI and Memorial information only for business or clinical purposes. Also, PHI is only to be accessed when the information is needed for legitimate clinical or business purposes. We are responsible for protecting this information from inappropriate disclosure to those outside of our organization. It is especially important to safeguard information about our patients, clients and residents. State and federal laws protect the confidentiality of this type of information. Suspected violations of this policy are promptly investigated, and if substantiated, result in disciplinary action.

Within the Memorial Family of Services, information is shared on a need-to-know basis.

F. Protect and Safeguard the Confidentiality/Rights of Memorial Employees

Every employee has the right to confidentiality of certain employment records, protected health information (PHI) and relations (including disciplinary actions) as well as the privacy of personal activities outside of business hours. In turn, Memorial Family of Services has rights of access to all hospital, Memorial Physicians, and Family of Services' property including computers, and all communications, electronic mail and voice-mail messages, records and information created in the business setting. By using company property, including computers or creating such records and information, the employee grants consent to Memorial for such access.

The Memorial Family of Services emphasizes the need for balance between work, personal and family life and encourages employees, managers, directors, medical staff members, trustees, vendors, students, instructors and volunteers of Yakima Valley Memorial Hospital, Memorial Physicians, and our Family of Services to pursue interests and activities outside the workplace. Personal interest and beliefs, however, are not to be imposed on other employees or upon the hospital or our Family of Services. Personal statements, for example, must not appear to represent the view of Memorial.

G. Software

Memorial Family of Services uses only legally licensed software in its operations. Use of unlicensed, "pirated" or "bootleg" copies of software is morally and ethically wrong, and it is also illegal.

H. Computer and Electronic Data

Electronic communication systems (notably voice-mail, electronic mail (email), Internet, fax and computer generated output and downloads), and all messages generated on or handled by electronic communications systems, including back-up copies, are considered to be the property of Memorial Family of Services and used for authorized business purposes only.

IV. Conduct Business Activities in an Ethical Manner

Memorial Family of Services believes in conducting business legally, ethically and morally. Laws, regulations and policies govern how we conduct Memorial business, that is, how we relate to our patients, residents, customers, the public, government officials, business associates and competitors.

A. Receipt of Gifts, Gratuities or Favors

We do not accept gifts, favors or other items of value from anyone outside Memorial Family of Services whose motivation is to receive some special treatment in exchange for them. Because it may be difficult to determine whether the giver's motivation is improper, it is best to refuse gifts offered to us by those outside the system. Gifts of inconsequential value, especially food items, which are provided in gratitude, may be accepted.

B. Kickbacks and Rebates

Neither we nor our immediate families receive personal kickbacks, rebates or lavish gifts or gratuities from Memorial Family of Services customers or contractors.

C. Contracts

Only officers of Yakima Valley Memorial Hospital, Memorial Physicians, and our Family of Services are authorized to sign contracts on behalf of Memorial.

D. Purchasing of Goods and Services

Purchasing decisions are always made free from any conflicts of interest that could affect the outcome. Memorial Family of Services is committed to a fair and objective procurement system that results in the acquisition of quality goods and services for Memorial at a fair price. Memorial also values participation with local vendors. Purchasing decisions are made without regard to race, nationality, age, religion, gender or disability of the vendor.

E. Travel and Business Related Expenses

Promptly record business expenses completely and accurately on expense reports. Entertainment, meals and travel expenses are for reasonable business purpose. Proper receipts are to be provided.

Travel and lodging expenses provided by a Memorial Family of Services supplier or other third party is acceptable if the trip is for business and is approved in advance by the employee's supervisor.

F. Political Contributions

Employees are encouraged to take an active interest and to participate in civic and political activities. However, Memorial Family of Services political activities are limited by law and prohibit the contribution of money, or the use of vehicles, equipment or facilities to candidates for federal, state or local office. In addition, political activities cannot interfere with the employee's ability to perform on the job and are not to imply participation or endorsement on the part of Memorial or our Family of Services.

G. Nonsolicitation

Memorial Family of Services' ("Memorial") No Solicitation policy is designed to be applied to all Memorial employees, contract staff, volunteers, students and visitors.

Memorial prohibits solicitation by, and of, its employees, contract staff, volunteers and students (collectively, individuals), except as expressly set forth in this Policy. Solicitation on Memorial premises by visitors is prohibited, unless expressly otherwise stated in this Policy.

Definitions:

- Working time includes the working time of both the individual doing the soliciting or distributing and the individual to whom the soliciting or distributing is directed. Working time does not include rest or meal breaks, or before or after work shifts.
- Non-work areas include public areas, such as break rooms, the seating areas of the cafeterias, or the display areas of the gift shops, during an employee's non-working time.
- Immediate patient care areas include patients' rooms, operating rooms, clinic examination or procedure waiting rooms, and other areas where patients receive treatment, such as x-ray and therapy areas. Immediate patient care areas also include any other area where personal activities would cause disruption of healthcare operations or disturbance of patients, such as corridors in patient treatment areas, and rooms used by patients for consultations with physicians or meetings with families or friends. For purposes of this policy, immediate patient care areas include patient homes and skilled nursing facilities when Memorial staff is present to provide patient care.

Guidelines:

Telephones, Switchboard and Other Electronic Devices:

- Individuals are to limit their personal use of Memorial telephones and electronic communication systems to brief local calls or emails to family members or friends, and for emergency personal calls only. If personal calls on Memorial's systems/equipment are necessary, frequency and duration is to be limited. Please be mindful of the content and volume of any personal calls made on Memorial's equipment and adhere to our policies and values, including but not limited to those regarding customer service and respectfulness, anti-discrimination, anti-harassment and HIPAA. The use of Memorial equipment for the purpose of solicitation is prohibited.
- Personal calls, emails or texts on personal phones or similar devices are to be during non-working time and outside of immediate patient care areas. Individuals should safely store all personal devices, cell phones, hand held game systems, hand held computers, iPods, iPads, or other personal devices during working time. Use of personal devices for the purpose of solicitation during working time is prohibited. It may not only distract an individual from the performance of work, but is inconsistent with our standards of customer service and respect for patients/family members.
- Individuals may not use personal devices to record audio or video, or take images of patients within our facilities at any time in any areas which violate HIPAA or other patient privacy rights.
- Memorial mail, email and fax services are intended for work-related correspondence. Memorial postage and stationery is for Memorial-related correspondence only.

Solicitations and Distribution of Literature on Memorial Property:

In order to prevent disruptions in Memorial's operations, as well as to focus on patient care, and maintain safety and security in our facilities, the following policies apply to solicitation and distribution of literature on Memorial's property.

Non-Employees

The general public is prohibited from soliciting or from distributing literature on Memorial's property. Persons not employed by Memorial may not solicit or distribute literature on Memorial property for any purpose at any time, except for bona fide Memorial-related business purposes (e.g. A pre authorized visit by a pharmaceutical representative, health or wellness fair etc.). This prohibition includes charity solicitors, real estate, financial services or insurance sales people, union representatives, survey or questionnaire activity, or any other form of non-employee solicitation or distribution. If any Memorial employees are represented by a union, that union's representatives may only access Memorial's facility to visit represented employees consistent with the terms of this policy or applicable provisions of a written agreement between Memorial and such union.

Employees

Nothing in this policy will be administered in such a way to restrict non-supervisory/non-managerial employees' rights to engage in protected concerted activity. Employees may discuss their employment terms and conditions with each other during their own time (e.g., non-working time) outside of immediate patient care and work areas.

Individuals may not solicit each other for any purpose during working time. Working time includes any period when the employee is expected to perform work tasks. During non-working time, such as breaks and meal periods, and before or after a shift, reasonable solicitation and contact between employees is permitted outside of immediate patient care and work areas. Working time includes both that of the individual who is soliciting or the individual who is being solicited.

The bulletin board in the Dietary hall way is available for posting with approval from Administration.

In managing solicitation and distribution, Memorial does not mean to discourage staff support of worthy community events and charities. Memorial believes that it has a responsibility as a member of the nonprofit community to support necessary charitable and character-building services through voluntary contributions of its citizens. To minimize disruption on Memorial's operations, patients and their families, however, Memorial may endeavor to minimize the number of charity drives by occasionally sponsoring a United Way, a blood drive, or similar community-based program as part of our mission.

H. Advertising and Promotion of Services of Memorial

All advertising is reviewed in advance by Corporate Communications. Our advertising is truthful; we do not make misrepresentations to anyone. Information is supported by reference to source data or authorship when necessary.

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I. Document Medical Services Rendered

All medical services rendered are accurately and completely documented in the appropriate medical record. These services also comply with the applicable payer regulations and standards of practice.

J. Correctly Code and Classify Diagnoses and Procedures

Complete, clear, and accurate documentation is the foundation for complete and accurate coding of all types of medical records. Memorial Family of Services is responsible for reviewing each medical record, inpatient, outpatient and emergency room records, and assigning the necessary code to each pertinent diagnosis and procedure(s). This is accomplished by using currently approved diagnostic and procedural coding standards and rules, as well as other valid sources.

K. Billing and Claims

When claiming payment for health care related services, Memorial Family of Services has an obligation to its patients, third party payers and state and federal governments, to exercise diligence, care and integrity. Memorial is committed to maintaining the accuracy of every claim it processes and submits. Refer to the Corporate Compliance Plan.

Any false, inaccurate or questionable claim is reported immediately to your manager, the Corporate Compliance Committee, the Business Conduct Committee or the confidential Ethics/HIPAA/Privacy Line.

Examples of false claims include:

- Claiming reimbursement for services that have not been rendered.
- Filing duplicate claims.
- Up-coding to more complex procedures than were actually performed.
- Including inappropriate or inaccurate costs on cost and expense reports.
- Falsely indicating that a particular healthcare professional attended a procedure, or that services were rendered in a manner they were not.
- Billing for a length of stay beyond what is medically necessary for the patient.
- Billing for services or items that are not medically necessary for the patient.
- Billing excessive charges.

L. Patient Referrals

The choice of healthcare facility, provider or supplier is made by the patient or the patient's legal representative with guidance from their physician regarding quality and medical appropriateness. Physicians ensure patient referrals are in compliance with the applicable physician self-referral and anti-kickback laws. Facilities, providers or suppliers employed or owned by Memorial Family of Services are clearly identified as such to the patient before a decision is made.

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M. Patient Transfers

The Emergency Department is known as a place where any sick or injured person may come for care regardless of his or her ability to pay. The Federal government has enacted the EMTALA (anti-dumping”) law to ensure that patients receive a medical screening examination and are not transferred from one emergency room to another facility unless it is medically appropriate. Physicians ensure patient transfers are in compliance with EMTALA as well as the applicable physician self-referral and anti-kickback laws.

Facilities, providers or suppliers employed or owned by Memorial are clearly identified as such to the patient before a decision is made.

N. Physician Recruiting

Physician recruitment has implications under the Anti-kickback Laws, the Stark Law and the IRS rules governing Hospital and Nursing Home tax exempt status. Each recruitment package or commitment is in writing. Recruitment arrangements are reviewed and approved by the CEO and legal counsel.

O. Physician Arrangements

Physician office space and personal service contracts with physicians are in writing and signed by the physician and CEO or designee. Rental charges and compensation is set in advance, at fair market value without regard to volume or value of referrals by the physician. All physician arrangements are reviewed and approved by the CEO or designee.

P. Physician Practice Acquisitions

To improve the delivery of and access to health care services, Memorial Family of Services may acquire physician practices. These acquisitions require special attention to comply with applicable laws. They are reviewed and approved by the CEO and legal counsel.

V. Promote a Safe, Healthy and Professional Work Environment

Memorial Family of Services is committed to providing a healthful work environment. We abide by safe operating procedures to safeguard the health and safety of all who work for us, as well as those individuals who we serve. Employees, managers, and directors, follow Human Resources Personnel Policies. Medical staff members abide by the medical staff bylaws. Volunteers abide by Volunteer Services policies

A. Professional Conduct

Memorial Family of Services is committed to providing the highest level of respect and courtesy to all our customers. Training is provided and required for Memorial employees, managers, directors, students, instructors and volunteers who have direct contact with our customers.

B. Personal Appearance and Attire

Memorial Family of Services employees present a professional, confident appearance and dress according to the Personal Appearance policies and guidelines.

C. Employee Relations

Memorial Family of Services does not discriminate against employees or applicants on the basis of race, color, religion, national origin, disability, gender, sexual orientation, age or veteran status. Memorial prohibits harassment, including unwelcome sexual overtures, advances, requests for sexual favors, inappropriate comments or jokes referring to gender, age, race, physical characteristics, or other similar conduct. We do not adversely affect another employee's work performance or create an offensive or hostile working environment.

D. Communication

Memorial Family of Services encourages a work environment of open and honest communication, where ideas are shared and creativity is valued. The responsibility for communication is two-way for the sharing of ideas, suggestions and concerns. The most direct source of information is from your supervisor. Additional resources include employee newsletters, the Intranet, fliers, postings, and announcements. It is expected that each employee makes use of these resources to ensure awareness of hospital, Memorial Physicians, and Family of Services activities, issues, or concerns as they pertain to you personally or to your work. We promote communication using positive, affirming principles from Into the Blue.

At Memorial Family of Services we make a commitment to our co-workers to:

- Act in a respectful way towards each other
- Accept responsibility to establish & maintain healthy interpersonal relationships
- Establish & maintain relationships of functional trust

E. Substance Abuse

Memorial Family of Services is a Drug Free work place. We do not use illegal drugs or alcohol while conducting Memorial business, while on Memorial property, or while operating a Memorial vehicle. These substances impact an employee's ability to provide quality services, and are reported immediately to the manager.

F. Security

The major responsibility rests with employees and medical staff members for safeguarding our patients/residents, clients, visitors and ourselves. This is achieved by observing the rules and regulations of various departments concerning security. Any violations are reported promptly to the Memorial Family of Services Security Department.

G. Weapons or Firearms

Employees do not carry or display weapons or firearms, even with a concealed weapons permit, while on Memorial Family of Services property.

VI. Administrative Matters

A. Interpretation

If questions still exist regarding how a section is interpreted or applied, it is your responsibility to contact the following in this order: supervisor, manager, Business Conduct Committee or call the Ethics/HIPAA/Privacy Line.

B. Reporting and Investigating Violations

We are all responsible for complying with business conduct policies, and also for reporting any activity which we in good faith believe may be in violation of them. Reporting violations is required and represents the highest level of corporate citizenship. Failure to report a suspected violation may result in harm to a patient, employee or Yakima Valley Memorial Hospital, Memorial Physicians, and our Family of Services' ability to successfully function. Suspected violations of these policies are promptly investigated, and if substantiated may result in disciplinary action up to and including termination.

Retaliation and retribution is prohibited and is not tolerated against anyone raising a concern, or by anyone against whom an allegation has been raised.

C. Ethics/HIPAA/Privacy Line

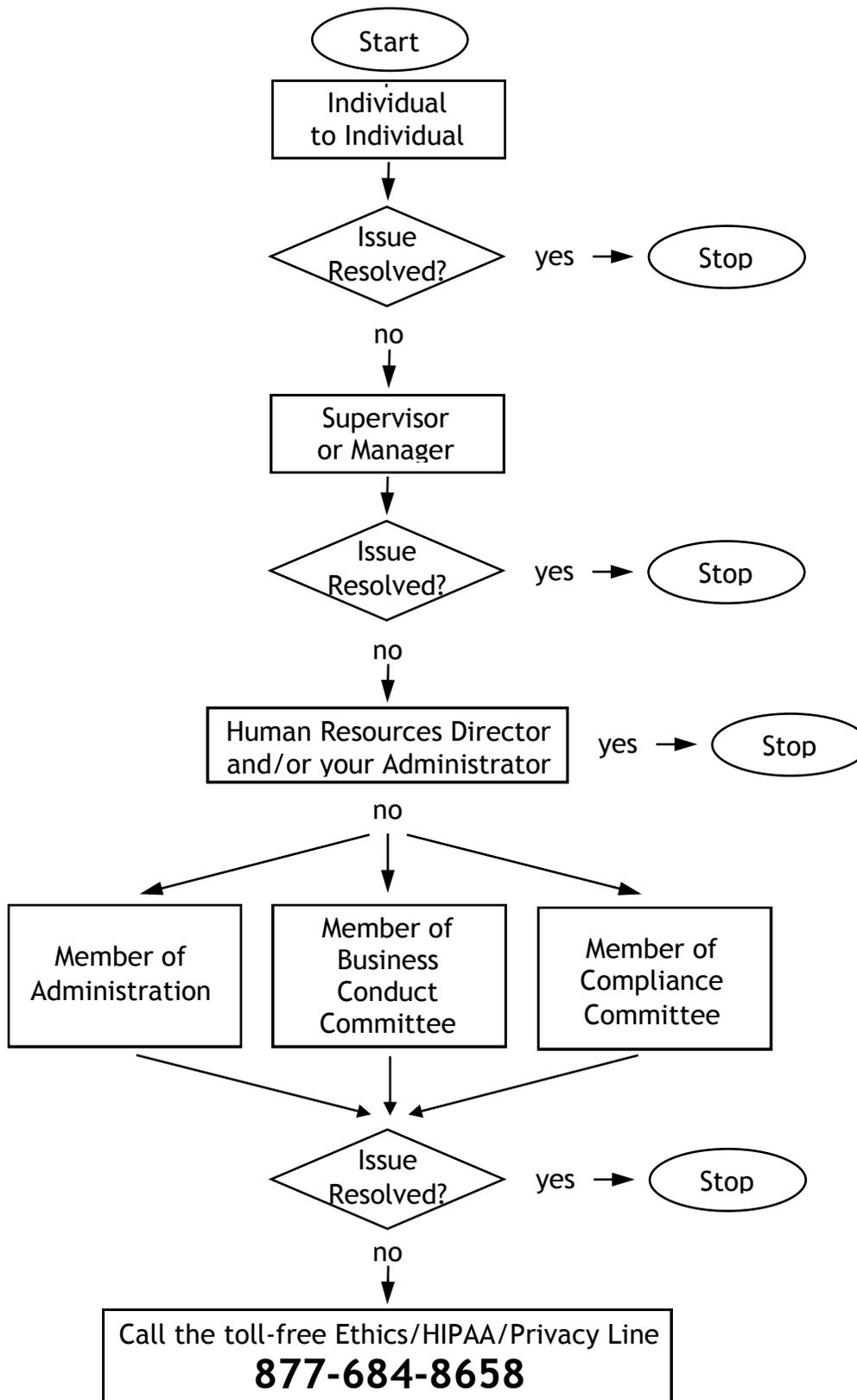
Memorial Family of Services provides a confidential, toll-free Ethics/HIPAA/Privacy Line. If you have a question or concern that cannot be addressed by your manager, or the normal chain of command, you may call the Ethics/HIPAA/Privacy Line. Your confidential message regarding a violation is reviewed and investigated by trained personnel with a review by the Business Conduct Committee, if necessary.

Caller anonymity is guaranteed to the extent permitted by law. Retribution or retaliation for calling the Ethics/HIPAA/Privacy Line is prohibited.

To report a suspected ethics violation, contact any of the following in this order:

- Your manager or supervisor
- Your administrator or Human Resources
- A member of the Business Conduct Committee, Corporate Compliance Committee or Administration
- The Ethics/HIPAA/Privacy Line at **877-684-8658**

D. Issues Resolution Process



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E. Patient Reporting of Suspected Violations

A patient may report a suspected violation to:

The Department Manager
Patient Representative: 249-5200
An Administrator at 575-8007
The Ethics/HIPAA/Privacy Line at 877-684-8658

F. Disciplinary Action

A failure to comply with these standards of conduct may result in disciplinary action, up to and including termination of employment. Failure to report a suspected violation may also result in disciplinary action.

VII. Our Goal: An Ethical Work Environment

Memorial Family of Services has established this Code of Ethical Business Conduct, the Corporate Compliance Plan, and the Ethics/HIPAA/Privacy Line to underscore its commitment to ethical and legal conduct throughout the organization. In addition, the following committees focus attention in each of these areas: Business Conduct; Compliance & HIPAA; Consultative Ethics; Clinical Ethics; Performance Improvement/Quality Assurance; and Patient Rights.

These committees and officer report directly to the CEO and work with each Memorial-affiliated organization to coordinate and implement a vigorous plan to promote a positive, ethical work environment.

Organizational & Leadership Development (O&LD)

Revised February 26, 2014



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