

Tri-City Healthcare District

Code of Conduct

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About Our Code and Your Responsibilities

OUR COMMITMENT TO QUALITY CARE - OUR VALUES

Quality
Caring
Safety
Integrity
Innovation
Stewardship

Tri-City Healthcare District exists to serve the healthcare needs of its community. We are committed to furnishing each and every patient with high quality, compassionate care. To achieve this, we must all adopt a strong and deep commitment to embracing and living our values: quality, caring, safety, integrity, innovation, and stewardship.

Our values must be more than words on paper. Each of us has a responsibility to think about and be guided by the Tri-City values in everything we do, especially when faced with difficult decisions. Our values, as embodied in this Code of Conduct, applicable Policies and Procedures, and the support we provide to one another, will help guide us and ensure that we meet our ethics and compliance responsibilities and aspirations.

TO WHOM THIS CODE APPLIES

The Code of Conduct provides the ethical guidelines and expectations for conducting business for, or on behalf of Tri-City Healthcare District. It applies to all District officers and employees, at every level, and to our Board of Directors. It also applies to the District's medical staff, as well as vendors, consultants, contractors, and temporary employees, who often serve as an extension of the District.

COMPLIANCE WITH THE LAW AND REGULATIONS

This Code of Conduct reflects our commitment to conduct business consistent with fundamental ethical standards and to comply with applicable laws and regulations, including all applicable federal health care program laws, regulations, and program requirements.

Each of us is responsible for knowing and upholding the rules that apply to our jobs, including, as applicable, the requirements of Medicare, Medicaid, the Emergency Medical Treatment and Active Labor Act (EMTALA), the Health Insurance Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH), the False Claims Act, California's Confidentiality of Medical Information Act (CMIA), and all other applicable state and federal healthcare laws and regulations.

We are also required to seek advice from a manager, the Chief Compliance Officer, or the Legal Department if we are in doubt about the appropriateness and/or legality of an action. To help us understand and meet these obligations, this Code defines expectations, provides guidance, and identifies resources to help us address concerns.

RESPONSIBILITIES

Everyone is responsible for maintaining our reputation as a quality healthcare provider that practices legally and ethically. Meeting these responsibilities is critical to the District's success today and in the future. We need to act with integrity.

Without integrity, we fail our patients, our community, our coworkers, and ourselves. We must strive to maintain the highest ethical standards:

- **Be honest** in all you do.
- **Always obey** the law and all District policies and procedures, and act in a professional, honest, and ethical manner when acting on behalf of the District. Seek advice if in doubt about the appropriateness and/or legality of an action.
- **Know** the information contained in this Code and the related District policies and procedures, paying particular attention to the policies and procedures that pertain to your job responsibilities.
- **Complete** all required training in a timely manner.
- **Promptly report** concerns about possible violations of laws, regulations, this Code, or any District policies or procedures in accordance with the District's policies.
- **Cooperate** and tell the whole truth when responding to a compliance review or investigation. Never alter or destroy any records.
- **No excuses!** No reason, including the need to meet job responsibilities or organizational goals, is an excuse for violating laws, regulations, this Code, or District policies and procedures.

ADDITIONAL RESPONSIBILITIES OF DISTRICT LEADERSHIP

Individuals who manage others or are otherwise in a position of authority have these additional responsibilities:

- **Lead by example.** Managers are expected to exemplify the highest standards of ethical conduct.
- **Create a positive working environment** where everyone feels comfortable asking questions and reporting potential violations of this Code and its underlying policies and procedures. Never retaliate or seek retribution against those who raise issues or concerns.
- **Never ask or pressure anyone** to do something that you would be prohibited from doing yourself.
- Be aware of the **limits of your authority** and do not take any action that exceeds those limits. Never delegate authority to any individual whom you believe may engage in unlawful or unethical conduct.
- If you **supervise contractors** working on our behalf, ensure that they understand our expectations that they comply with applicable law, regulations and our Code.

As a manager, you need to monitor what is happening with those whom you supervise. If you become aware of conduct that may violate applicable law, regulations, our Code, or our policies and procedures, you **MUST** report it immediately. Not reporting a violation when you know or should have known about it may result in discipline up to and including termination of your employment.

Managers should not consider ethics concerns as threats or challenges to their authority. We want open, honest, and truthful dialogue to become a natural part of our daily work.

Q: I'm a manager, and I'm not clear what my obligations are if someone comes to me with an allegation – and what if it involves a senior leader?

A: No matter who the allegation involves, you must report it. See the next section of this Code for more detail on how to report it.

ASKING QUESTIONS AND REPORTING SUSPECTED VIOLATIONS

In today's complex healthcare environment, legal and ethical concerns routinely occur. When they do, employees must report the issues so that they can be addressed quickly and appropriately, minimizing the damage to the District and any involved parties. The sooner we know about possible problems, the sooner we can address them and find solutions. And of course, employees **MUST** report misconduct which they commit, witness, or hear about.

For reporting, employees have several options:

- Bring matters involving employee relations and discipline, work safety, job duties, harassment, and employee health to the attention of your manager or the Human Resources Department.
- Ask your manager or the Legal Department questions regarding handling legal documents, responding to regulatory inquiries, and how to determine and interpret the laws that apply to your job.
- Concerns regarding noncompliance with applicable laws and regulatory requirements must be reported to your manager, the Chief Compliance Officer, or by calling the **Values Line (800) 273-8452**.

The Values Line is available 24 hours per day, 365 days per year. Translators are available to speak in your native language, all calls are kept confidential, **and you can make your report anonymously, if you so choose**. If you make a report through the Values Line, you will receive an identification number so you can follow up on the concern. This is especially important if you have submitted a report anonymously, because it will enable you to provide additional information, and track the resolution of the matter.

Tri-City Healthcare District has an opportunity to improve every time an employee asks a question or raises a concern. When employees take action, speak up, and report questionable conduct, they are protecting their colleagues and our reputation. Remember, an issue cannot be addressed unless it is brought to someone's attention.

PROTECTION FROM RETALIATION

To build trust, we must listen openly to concerns about misconduct, respond appropriately, and never retaliate or seek retribution against those who raise issues or participate in investigations.

We take claims of retaliation and retribution seriously. All such claims will be thoroughly investigated. If they are substantiated, retaliators will be disciplined, up to and including dismissal from the District. If an employee believes he or she has experienced retaliation, the individual should report it using any of the methods described in the above section on *Asking Questions and Reporting Suspected Violations*.

ACCOUNTABILITY AND DISCIPLINE

All employees of Tri-City Healthcare District are required to obey all federal, state, and local laws and to abide by the rules set forth in this Code of Conduct and all District policies and procedures. Any individual who fails to do so is subject to penalties up to and including dismissal from the District along with criminal and/or civil prosecution.

AMENDMENTS AND WAIVERS

On rare occasions, Tri-City Healthcare District may amend or waive certain provisions of this Code. Anyone who believes that a waiver may be appropriate should discuss the matter with the Chief Compliance Officer or the CEO.

Any proposed waiver or exception must be approved by the Chief Compliance Officer and CEO in writing, per policy 8750-566.

OUR ETHICS AND COMPLIANCE RESOURCES

This Code and District policies serve as resources for employees to help guide their actions.

Employees also should be alert to changes in the law or new requirements that may affect their work as well as new District services that may be subject to special legal requirements.

In addition to the Code, it is important to remember that District leaders are a good resource when it comes to ethical business conduct, as are the Chief Compliance Officer, the Legal Department, the Human Resources Department, and the Values Line (800) 273-8452. Employees should feel free to take advantage of any of the resources provided.

MAKING THE RIGHT DECISION

Pressure often clouds our judgment, and occasionally, the right choice is not clear. Remember, support is available for employees facing a tough call. Our colleagues and managers can help us think through our options. Employees also may rely on this Code for help, or contact the Values Line (800) 273-8452.

When making a difficult decision, employees should ask three simple questions:

- **Is it legal?** If it isn't, don't do it.
- **Is it right?** How do you feel about the choice? Does your conscience give you pause? Would a close, trusted friend be okay with it?
- **How would I feel if the conduct appeared on YouTube or in the newspaper?** If someone posted a video of (or a blog entry about) what you had done and individuals around the world saw it, would it hurt your reputation or the reputation of Tri-City Healthcare District? If so, it is the wrong choice – don't do it!

Our Commitment to Our Patients

PROVIDING QUALITY MEDICAL CARE

The only acceptable standard of care at Tri-City Healthcare District is that of the highest quality. We provide care that is compassionate and that advances the health and wellness of all the people we serve. Our commitment in this regard is more fully set forth in the District's *Patient Handbook*, Policy 8610-302, and the Joint Commission's National Patient Safety Goals.

CARING FOR OUR PATIENTS AND THEIR RIGHTS

The District adheres to the highest standards in the realm of patients' rights and respecting patients' privacy, safety, and sovereignty over their own bodies. We communicate clearly with our patients about their rights and their options, and we make sure that they are empowered while availing themselves of our services and care.

District employees must be mindful that each of our patients has specific rights including:

- Considerate and respectful care, personal dignity, and comfort.
- To receive information about his or her health status, diagnosis, prognosis, and treatment.
- Free interpreter services available.
- To make decisions regarding medical care and to receive needed information.
- To request or refuse treatment, to the extent permitted by law.
- To have personal privacy respected.
- To receive care in a safe setting, free from abuse, neglect, or exploitation.

Patient Safety

No patient care goal is more important than that of ensuring patient safety. Employees of the District work diligently to correctly identify our patients, promptly communicate key care information to correct staff, properly use medications, and identify and manage other patient safety risks.

The Joint Commission provides certain patient safety goals, generally including:

- Identifying patients correctly.
- Maintaining and communicating accurate patient medication information.
- Preventing infection of all types, making use of all appropriate guidelines.
- Identify patient safety risks, including suicide risk.
- Complying with current CDC and WHO hand hygiene guidelines.

Safeguarding Patient Privacy and Confidentiality

Our commitment to upholding the law includes patient information privacy and security. Employees should disclose confidential patient information only as permitted by law to those with a need to know. We will hold our contractors and care partners to the same standards.

Our Commitment to One Another

RESPECT IN THE WORKPLACE

We are committed to fair and respectful treatment and equal opportunity in our employment interactions and decisions. Our colleagues and job applicants are entitled to respect and should be judged only on the basis of their qualifications, demonstrated skills, and achievements.

Remember:

- Treat others as you wish to be treated.
- Review your own decisions to ensure that only objective merit and healthcare considerations drive your actions.
- If you supervise others, judge them on performance. Avoid introducing unrelated considerations into your decisions.

Equal Employment Opportunity

We believe every employee deserves to work and grow in an environment free of unlawful discrimination, harassment, intimidation, and abuse. We understand that the District is best served when all perspectives are considered fairly and without prejudice. We prohibit any form of discrimination on the basis of a characteristic protected by state and federal law, and our policies. For more detailed information, please consult Policy 8610-418, or ask Human Resources.

Harassment

The District is committed to providing a harassment-free environment. The District's anti-harassment policy applies to all persons involved in the operation of the District and prohibits unlawful harassment by any employee of the District, including supervisors and managers, as well as vendors and customers. For more specific information regarding harassment, please consult Policy 8610-403, or ask Human Resources.

Remember:

- Treat coworkers with respect. Do not discriminate or harass anyone. Be open to different points of view, backgrounds, and experiences and recognize the value that diversity brings to our work.
- Let people know if you find their behavior to be demeaning or disrespectful of you or others. Don't tolerate discrimination or harassment in any form.
- Be professional. Do not visit inappropriate internet sites or display sexually explicit or offensive pictures. This prohibition does not include internet sites or pictures legitimately used in connection with your work for the District.
- Report all incidents of harassment and discrimination that may compromise our ability to work together in an appropriate environment.

Q: *One of my co-workers sends e-mails and text messages containing jokes and comments that make fun of certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?*

A: *You should notify your manager or the Human Resources Department. Jokes that demean or stereotype people's national origin, or any other protected characteristic, are inappropriate. Raise the issue now, so that it does not continue or even escalate.*

Q: *While attending an educational program with some coworkers at a local hotel, a colleague repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We weren't in the office and it was "after hours" so I wasn't sure what I should do. Does this violate our Code?*

A: *Yes. This type of conduct will not be tolerated, not only during working hours but in all work-related situations. Tell your colleague such actions are inappropriate. If they do not stop immediately, or if you don't feel comfortable confronting your colleague, report the issue.*

HEALTH AND SAFETY

Safe Working Environment

The District is committed to providing a safe and healthy workplace for our employees, as well as for patients and visitors to our facilities. We need to protect ourselves and others in our everyday actions. Situations that may pose a health, safety, or environmental hazard must be immediately fixed or reported to management. We can only achieve our goal of a safe and healthy workplace through the active participation and support of everyone. **The more we communicate, the better we can respond to any unsafe or unhealthy working conditions.**

Remember:

- Comply with all applicable health and safety laws, policies, and procedures. If you don't know what the safe thing to do is, ask someone who knows.
- Understand your job fully and follow instructions. Wear personal protective equipment in accordance with the job you are performing. Use, adjust, and repair equipment only if you are trained and qualified.
- If an unsafe condition cannot be immediately fixed, notify your manager or Human Resources immediately.

Q: *I've noticed some practices in my area that don't seem safe. Who can I speak to? I'm new here, and don't want to be considered a troublemaker.*

A: *Discuss your concerns with your manager. There may be very good reasons for the practices. On the other hand, sometimes new eyes see things that more experienced eyes have missed. Raising a concern about safety is not making trouble; it is being responsible.*

Abuse of Drugs and Alcohol

Part of maintaining a safe working environment is being certain that every employee is fully awake, aware, and able to do his or her job carefully and safely. We must be mindful of how others might be affected by our actions. We also should be mindful of our intake of alcohol at work-related events.

Remember:

- While at work or on District business, you should be alert, never impaired, and always ready to carry out your work duties.
- The use of alcoholic beverages or illegal substances during working hours will not be tolerated. The possession of alcoholic beverages or illegal substances on District property is forbidden.
- If you have a medical condition that requires you to use medication while working, and that medication could impair your mental or physical capabilities, you must notify Employee Health.

Workplace Violence

The District has a zero tolerance for acts and threats of violence. All such acts and threats, even those made in apparent jest, will be taken seriously, and will lead to discipline up to and including termination.

It is every employee's responsibility to assist in establishing and maintaining a violence-free work environment. Therefore, each employee is expected and encouraged to report any incident which may be threatening to you or your co-workers or any event which you reasonably believe is threatening or violent.

Threats include any indication of intent to harm a person or damage District property. Threats may be direct or indirect, and they may be communicated verbally or nonverbally.

Q: *Are visiting physicians, medical personnel, and contractors expected to follow the same health, safety, and security policies and procedures as employees?*

A: *Absolutely. Managers and supervisors are responsible for ensuring that anyone working on District premises understands and complies with all applicable laws, regulations and policies.*

PROTECTING DISTRICT ASSETS

It is our responsibility to care for, properly use, and protect our assets and resources. We must each use our best judgment to make sure District assets are not lost, stolen, or wasted, and are used only for legitimate business purposes. We must never use District assets for personal gain.

Our assets include:

- Our physical facilities;
- Computers, files, documents, and passwords;
- Confidential information;
- Employee time; and
- Machines, equipment, materials, and supplies.

Remember:

- Ask your manager before you take hospital property, such as files or personal computers, off District premises.
- Be aware that Tri-City Healthcare District reserves the right to search all our property, as well as anything brought onto or taken from District premises (including employee personal possessions).
- Do not use our equipment or systems, including email and the internet, to download, create, store, or send content that others might find offensive or that is illegal.
- Do not share passwords or allow others to use District assets.

CONFIDENTIAL INFORMATION

One of the District's most valuable assets is its confidential information. Confidential information includes information not publicly released such as patient information, personnel information, staffing changes, trade secrets, business plans, and employee medical information. The obligation to preserve and protect District confidential information is ongoing, even after employment ends.

Remember:

- Use confidential information only for legitimate operational purposes.
- Share confidential information only with people who need to know it.
- Forward all requests for information regarding a current or former employee's position/compensation with the District to the Human Resources Department.
- Avoid discussing confidential information when others might be able to overhear what is being said.
- Never use confidential information for personal financial gain or to compete with Tri-City Healthcare District.

Employee Privacy

Tri-City Healthcare District is committed to respecting the confidentiality of employees' personal information, such as personal records, photos, social security numbers, medical information, and home addresses. Only such personal data as is necessary will be acquired and retained by the District.

Employees authorized to have access to personal employee data are expected to ensure the security of the information and share it only with authorized persons on a "need-to-know" basis. We must make sure such information is stored securely and we should refrain from holding the information longer than is necessary to meet the legal or business reason for which it was acquired.

Q: *Are the emails I send from my computer protected by the District's privacy policy?*

A: *Tri-City Healthcare District respects the confidentiality of the personal information of employees; however, it is important to remember that employees have no expectation of privacy with regard to workplace communication, including emails, texts, and voicemails. Even communications with your personal attorney will not be privileged if the District email system or computers are used.*

Confidential Information – Business partners

Everyone with necessary access to District confidential information who is not employed by the District, including visiting physicians and medical personnel, contractors, and consultants, is expected to adhere to the District's specific policies and procedures with regard to information protection. Managers are responsible for ensuring that our business partners are duly authorized to handle our confidential information and are appropriately cautious with it.

ACCURATE CODING, BILLING, AND RECORDS

Trustees, patients, insurance companies, government officials, and others need to be able to rely on the accuracy and completeness of our business records and invoices. We must be honest in what we say, what we write and what we do. Accurate information is also essential within the District so that we can make good business decisions. This is why our coding, billing, and records must be accurate, timely, complete, and understandable.

Each of us is responsible for helping to ensure that invoices we submit are legitimate and appropriate, and that the codes and information we record are accurate, complete, and maintained in a manner consistent with our system of internal controls.

Remember:

- Always code and bill accurately, only for services rendered and documented properly. Ensure that any bills submitted are consistent with federal billing standards and federal medical program requirements.
- Make sure that financial entries are clear and complete and do not hide or disguise the true nature of any transaction.
- Do not record, understate, or overstate known liabilities and assets, or defer the recording of items which should be expensed.
- Do not maintain undisclosed or unrecorded funds, assets, or liabilities.
- Do not back date documents.
- Never make false claims on an expense report, time sheet, or in billing a health care program.
- If you are uncertain about the validity of an entry or process consult with your manager, or contact Human Resources.
- Only sign documents that you are authorized to sign and that you are certain are accurate and truthful. This includes approving invoices and journal entries as well as 'signing off' on financial statements.
- Bring any evidence of fraud in accounting, financial reporting, or internal controls to the attention of your manager, the Chief Compliance Officer, or the Values Line (800) 273-8452.

PROPER USE OF ELECTRONIC MEDIA

Electronic media includes everything from the content of CDs to email and text messages to websites, television, and radio broadcasts. We should all exercise discretion when using electronic media. These tools should never be used in a way that interferes with the conduct of District business. We also should avoid any usage that might lead to loss or damage, such as the introduction of viruses or a breach of our firewalls. We also must be aware of software licensing rules and never use unauthorized copies of software on District computers, or use District software on our personal computers in a way not intended by the license.

Remember, do not use District equipment:

- To download, save, send, or access any defamatory, discriminatory, obscene or illegal material.
- To gain or attempt to gain unauthorized or unlawful access to computers, equipment, networks, or systems of Tri-City Healthcare District or any other person or entity.
- In connection with any infringement of intellectual property rights, including but not limited to copyrights.
- In connection with the violation or attempted violation of any law.

Use of Social Media

District employees who choose to use social media should do so on their own time, be careful to comply with Policy 8610-479, and avoid discussing any District confidential or work information. Employees also should be careful when posting online to avoid giving the impression that they are speaking on behalf of the District unless authorized to do so.

Think carefully before hitting the 'send' button. These types of communications live forever. Remember, if you are not authorized to speak publically on behalf of the District, you should not do so.

RETENTION AND DISPOSAL OF DOCUMENTS AND RECORDS

Medical and business documents and records must be maintained in accordance with procedures and time frames established by applicable laws, accreditation standards, and the District's document retention policies. Medical and business documents include paper documents, such as letters and memoranda; computer-based information, such as e-mail or computer files on disk or tape; and any other medium that contains information about the District or its business activities.

We will not tamper with records, nor remove or destroy them before the time period specified in the District's document retention policies, and we will not destroy any records we know relate to pending litigation or government investigation.

Meeting the Letter and the Spirit of Laws and Regulatory Requirements

COMPLIANCE AND TRANSPARENCY

We are obligated to follow all relevant local, state, and federal laws and regulations. Each of us is responsible for knowing which of these apply to our respective jobs. An employee who is unclear about a law is responsible for asking questions of his or her manager, the Legal Department, or Human Resources. Failure to comply with the laws and regulations which govern our services undermines our mission and will ultimately lead to serious consequences for the District and its employees.

Transparency is key to maintaining a culture of compliance with healthcare laws and regulations. When we are open and clear about our actions we can more readily demonstrate our compliance, and we can more easily spot and remedy any errors or confusion about a law or regulation.

CONFLICTS OF INTEREST

A conflict of interest occurs whenever an employee has a competing interest that may interfere with his or her ability to make a sound, objective decision for the District. We must never use our positions with Tri-City Healthcare District, or with any of its patients or vendors, for private gain, to advance personal interests, or to obtain favors or benefits for ourselves, members of our families, or any other individuals or entities. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict.

It is impossible to describe every potential conflict. Therefore, the District relies on each of us to uphold the highest standards of integrity and to seek advice when needed. Please consult Policy 8610-462 or Human Resources for more specific information.

Remember:

- If you believe a conflict or potential conflict exists, you must disclose it to your manager, or Human Resources.
- Any situation that creates, or even appears to create, a conflict of interest between your personal interests and the interests of the District and our patients should be avoided.

Personal Relationships

We must not let personal relationships with friends or family members influence our work-related decisions in a way that causes us to act against the best interests of Tri-City Healthcare District. This includes decisions made about hiring employees, selecting vendors, and billing. Employees should obtain management approval before becoming involved in such decisions.

Financial Incentives to Provide Care

We should be especially careful to avoid even the appearance of any conflicts of interest in our dealings with physicians and other healthcare providers. We must never offer or provide anything of value to encourage or reward referrals from other healthcare professionals, and we also must not accept them. These types of gifts are typically viewed as bribes or kickbacks, which are illegal.

Remember:

- Do not offer, pay, or accept bribes or kickbacks.
- Do not tie compensation to volume or value of referrals.
- If you are aware of a District employee who is offering, paying, or receiving kickbacks or bribes, or if you suspect such behavior is occurring, report your concern to your manager, the Chief Compliance Officer, or the Values Line (800) 273-8452.

Outside Business or Employment

Tri-City Healthcare District employees occasionally take on additional, outside employment. This could constitute a conflict of interest if that outside work interferes with the employee's ability to fulfill his or her responsibilities to the District, or if there is a risk that the outside employment may cause the employee to disclose District confidential information.

An employee who plans to take on outside employment or who already has an outside job or consulting arrangement that is related in any way to the healthcare industry must disclose it to Human Resources. Please see Policy 8610-462 for more detailed information.

Personal Investments or Transactions

Ownership by a District employee of an investment in a vendor, competitor or business partner could influence decisions made by that employee. For those employees who are not already required to annually disclose such interests under the District Conflict of Interest Code, such ownership interests in companies not publicly traded on a national stock exchange must be reported to Human Resources.

Additionally, any District employee who holds an ownership stake in any other healthcare entities (e.g., labs, outpatient imaging centers, rehabilitation facilities, etc.) must be careful about how this ownership affects any decisions made on behalf of the District. Referring Tri-City patients to such entities is called self-referral and may implicate and violate various anti-self-referral and anti-inducement laws and regulations. In addition, such interests are reportable by employees designated in the District Conflict of Interest Code, and may result in disqualification from some decision-making.

Boards, Panels, Foundations, Consulting Arrangements

Memberships or participation in outside organizations, especially those which oversee, approve actions by, receive grants from, or have contracts with the District, should be disclosed in advance to Human Resources. Examples of such arrangements are municipal Board memberships; focus groups, discussion panels and advisory boards for makers of healthcare products; community health clinic boards; and participation in a Foundation that distributes financial support to research or healthcare entities. You may be directed to manage such conflicts by removing yourself from any decision making that will impact Tri-City Healthcare District. In some instances in which a conflict of interest precludes you from carrying out your responsibilities to the District, resignation may be necessary.

ACCEPTING GIFTS AND ENTERTAINMENT

District employees are not allowed to accept gifts or gratuities that are inconsistent with Policy 8610-425, 8610-462, this Code, or that could influence decisions regarding patient care or business. We have one excellent standard of care for all patients, and that standard should not be affected in any way by gifts.

PROVIDING GIFTS, MEALS AND ENTERTAINMENT

Gifts, meals or entertainment may only be given to others if they are reasonable complements to business relationships, are of modest value, and are not against the law or the policy of the District or the recipient's organization. While it is a legitimate business activity to entertain our business partners and prospects ancillary to our business with them, no such activity should involve behavior that would otherwise violate policies or reflect poorly on our reputation. In addition, these activities may implicate the federal health care program anti-kickback law (the "Anti-Kickback Law"), 42 U.S.C. § 1320a-7b(b), and the federal physician self-referral law (the "Stark Law"), 42 U.S.C. § 1395nn.

Remember:

- Before you provide gifts or entertainment, be sure it is consistent with both District policy and the policies of the recipient's employer.
- Never provide gifts to government officials without prior Legal Department approval.

COMPLIANCE WITH GOVERNMENT HEALTHCARE REGULATIONS

Tri-City Healthcare District complies with all federal, state, and local laws that govern our healthcare practices. We operate in full cooperation with the Federal False Claims Act and the Deficit Reduction Act, which are intended to protect government programs including Medicare, Medicaid, and TRICARE from fraud, waste and abuse. Our policies promote accuracy and transparency in our coding and billing practices for both government and private payers, and we offer protection for whistleblowers.

We comply fully with EMTALA, which protects patients seeking emergency care, and are committed to providing all necessary care to any patients who come to us requiring emergency medical treatment. We adhere to all laws governing improper payments, such as the Federal Anti-Kickback Law, which prohibits offering, giving, or accepting anything of value to motivate or reward referrals.

WORKING WITH REGULATORY AUTHORITIES

Tri-City Healthcare District and its employees are committed to cooperate with all regulatory authorities. We will provide any information required by state and federal audits and investigations promptly, fully, and honestly. We will not alter, withhold, or destroy any records related to an investigation.

Employees should notify the Legal Department before responding to a subpoena, search warrant, request for an interview or other non-routine request for access to information related to District matters.

Our Commitment to the Community

TRI-CITY HEALTHCARE DISTRICT – IN THE COMMUNITY

We have a responsibility, as a healthcare provider, to be a good corporate citizen. We encourage participation in, and strive for the improvement of, the communities in which we live and work. We support giving and volunteering in our communities, and we understand the value of our good reputation to our communities.

While employees are encouraged to be involved in community organizations and projects of their choice, we should never present our personal views or actions as if they represent Tri-City Healthcare District's position. Any charitable contributions or donations on behalf of the District must be approved by the Board of Directors.

Outside activities must not interfere with job performance. Employees should not exert improper influence in business decisions regarding a charity or other organization where they volunteer.

Q: *My manager often asks me to buy candy bars as part of fund raising activities for his children's schools. He also encourages us to support his favorite charities and sponsor him in fundraising walks and races. Sometimes I feel I don't have a choice. What can I do?*

A: *Selling, soliciting, or collecting contributions for any purpose on the District's premises is prohibited. The only exception is for District-approved fundraisers such as March of Dimes. In addition, pressuring others to contribute to or join charities, groups, or political activities is not allowed. Your manager may not view his actions as 'pressure' and may not be aware of our policy. If you are comfortable doing so, talk to him about the problem. As an alternative, you can contact Human Resources.*

ENVIRONMENTAL COMPLIANCE

The District actively seeks opportunities to improve the quality of life in our communities and to improve the environment that sustains us all. We recognize the need to provide our services in a way that protects and improves the state of the environment for future generations.

We are committed to meeting or exceeding applicable environmental laws and regulations and to continuously improving our environmental performance through resource conservation, waste minimization, and water and energy efficiency.

Remember, we must:

- Comply with all applicable environmental laws, regulations, and District policies.
- Be proactive and help identify opportunities for improving our environmental performance, including, for example, additional ways that we can conserve and recycle.
- Support waste reduction and recycling efforts at the District and in our communities.
- Comply with medical waste disposal protocols.

COMMUNICATING WITH THE PUBLIC

Tri-City Healthcare District needs a clear, consistent voice when providing information to the public and the media. For this reason, it is important that only authorized persons speak on behalf of the District. Employees should never give the impression that they are speaking on behalf of the District in any communication that may become public if they are not authorized to do so.

Remember:

- If you receive an inquiry regarding District activities, results, or plans, or its position on public issues, and are not specifically authorized by District leadership to respond, refer the request to your manager.
- Obtain approval from the Legal Department, Chief Executive Officer, or Director of Public Relations before making public speeches, writing articles for professional journals, or engaging in other public communications on behalf of the District.

POLITICAL CONTRIBUTIONS AND POLITICAL ACTIVITY

As a responsible healthcare provider and member of our community, we respect the rights of employees to voluntarily participate in the political process outside of work hours and beyond District premises.

We also are committed to following the rules and requirements set forth by the Political Reform Act of 1974 in its most current form.

Employees must always make it clear that their views and actions are their own and not those of Tri-City Healthcare District. Employees must not use the District's resources to support their personal choice of political parties, causes, or candidates.

Remember:

- Lobbying activities or government contacts on behalf of the District must be coordinated with management, and be consistent with Board-adopted policies, as well as local and state registration laws.
- The District may not engage in any political spending, including donating products, services, transportation, or facilities to politicians or political organizations.
- Holding or campaigning for political office must not create, or appear to create, a conflict of interest or incompatibility with your duties at the District.

Q: *What types of expenditures are covered by the prohibition on political contributions by the District?*

A: *Political contributions include monetary spending, as well as indirect contributions such as the purchase of tickets to a political fundraiser. The prohibition also applies to "in-kind" contributions such as the use of District personnel or facilities, telephones, email systems, or payment for services.*