



ENSEMBLE
HEALTH PARTNERS

Corporate Responsibility:
Core Values in Action

Our mission

At Ensemble Health Partners, our mission as an employer is to empower every member of our team to realize their maximum professional potential and to create an environment conducive to our shared success. The Ensemble Difference is the foundation of principles that allows us to carry out that mission. These principles both help our associates to not only understand what we expect as an employer, but also what kind of behavior to expect from our leadership team in support of their role at Ensemble Health Partners.

Contents

Letter from the President	2
Corporate responsibility program	3
Introduction	4
Goals	5
How to direct questions and report concerns	6
The 3-Step Process	6
No retaliation for reporting concerns in good faith	7
Overview of code of responsibility and standards of responsible conduct	7
Ethical decision making	11
Code of responsibility	13
Standards of responsible conduct	15
Principle 1: Our culture of honesty and integrity	16
Principle 2: Our culture of stewardship of resources	18
Principle 3: Our culture of legal and regulatory compliance	20
Principle 4: Our culture of trust with sensitive information	26
Principle 5: Our culture of transparency to avoid conflicts of interest	29
Principle 6: Our culture of dignity and respect for all	32
Certification	33

Certificate and contact information are made available with this booklet.

Letter from the president

At Ensemble Health Partners, we're not your typical revenue cycle company. We are a customer service company that happens to be in the revenue cycle business.

We've experienced exponential growth, and we've achieved so many great results on behalf of the clients we serve. But none of this would have been possible without the people that are a part of the Ensemble Health Partners team.

From top to bottom, every associate of our team is expected to follow a set of principles that we call the Ensemble Difference. These principles help our associates to not only understand what we expect as an employer, but also what kind of behavior to expect from our leadership team in support of their role at Ensemble Health Partners.

When you work for Ensemble Health Partners, or when you work with our team, one thing you should know is that we want your feedback. Good or bad — we encourage you to speak up — that's how we get better!

At Ensemble Health Partners, we are also committed to conducting business activities in full compliance with all federal, state and local laws and regulations. It's the responsibility of all of our team to follow all laws, rules, regulations and internal policies like the Ensemble Difference.

And so we've created some tools and resources that will help each of us to meet those responsibilities. These tools, including this training, our Code of Responsibility and Standards of Responsible Conduct and ReportLine, as well as our Corporate Responsibility Officers, will help each of us every day in that goal.

The Corporate Responsibility Program is so important to Ensemble Health Partners. I know that you will find this guide to be a trusted resource for putting this program and the Ensemble Difference in action.

Judson Ivy

President

Ensemble Health Partners

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Corporate responsibility program



Introduction

At Ensemble Health Partners, we are a customer service company that happens to be in the revenue cycle business. When our customers partner with us, our people become their people. We put our customers first, last and always – and create real value by building relationships, reducing revenue cycle spend and delivering exceptional results. It's what we do.

We also commit to fulfill all ethical, professional and legal obligations and to foster a culture that enables others who work with us to do the same. We developed the Corporate Responsibility Program to provide guidelines, education and tools to help all of us meet these commitments. The Corporate Responsibility Program helps us better understand and obey health care laws and rules. It also enables each of us to put our Core Values — The Ensemble Difference — into action. As a partner of Mercy Health, we also abide by the Statement of Common Values.

Most of us make decisions based on “doing the right thing.” The Corporate Responsibility Program works by applying that “Golden Rule” to hard decisions. The Program stresses “doing the right thing” at every level of our organization, obeying all relevant laws and rules and dedicating ourselves to excellence and to the wise use of resources in our work. It also emphasizes that each of us has a duty to speak up to ensure that our organization remains a model of responsible and ethical practices. This

philosophy is not new to Ensemble Health Partners or to any of our organizations. We have many programs already in place to promote excellence, quality and responsible conduct. Quality initiatives and best practices are two examples. The Corporate Responsibility Program builds on these efforts. It ensures that we make the right decisions every day, at every level of the organization and that we support others' efforts to do the same.

The challenges in revenue cycle make our Corporate Responsibility Program critical for our success. We must provide quality work more efficiently. We must manage costs. We must obey growing numbers of Federal, state and local laws and rules. The stakes are high. Improper action could hurt our well-deserved reputation for integrity, quality work, clients and customers and the trust we've worked so hard to earn with those we serve.

Goals

The Ensemble Health Partners Board of Trustees set up the Corporate Responsibility Program to:

- Promote justice and ethics in our business practices.
- Foster good corporate citizenship.
- Educate every associate about our Standards and what we expect.
- Give you the tools to make responsible decisions and to report concerns promptly.
- Prevent, find and correct violations of our Standards, as well as laws and rules.

The Program also addresses how we monitor and enforce our Standards and their impact on Human Resources (HR) policies. The Program will change from time to time to keep pace with changes in health care, regulatory and legal areas.

We have staff to help you with your questions or concerns about decisions, actions or policies. A Corporate Responsibility Officer (CRO) has been designated, who serves on the senior management team and oversees daily Program activities. The CRO works closely with the parent company's Corporate Vice President and Chief Corporate Responsibility Officer, who designs, coordinates and reports on the effectiveness of the Program to the Board of Directors, Board Audit and Corporate Responsibility Committee and is responsible for the overall Program. The CRO also work closely with the General Counsel for oversight of legal issues for the organization. The CRO's name and contact information are made available with this booklet.

How to direct questions and report concerns

You may call or report online through the Ensemble Health Partners ReportLine 24 hours a day, seven days a week. An outside company with special training answers these calls. The ReportLine does not use Caller ID or trace any call. All reports are confidential. If you provide your name, we will contact you with a response. If you prefer not to give your name, you will receive a code number and a date to call or follow-up on-line via ReportLine for the answer.

The 3-Step Process

Our associates have a duty to report promptly and in good faith any potential violations of law, regulations, policies, procedures or the Ensemble Health Partners Standards of Responsible Conduct. In many cases, we have processes in place to resolve concerns or obtain answers to questions (for example, HR). The Corporate Responsibility Program builds on those processes. We encourage you to use existing processes when you can. We realize that no single resource can answer every question or issue. So, we created a three-step process to help resolve issues, answer questions or report concerns or possible violations.

1. If we have no process to address your concern or question, first talk with your supervisor or other managers in the organization. They may help you or refer you to others who can. Other resources include our Human Resources staff (for issues about work conditions, discrimination or harassment); security staff (for issues about physical security, theft or abuse of property); and Quality Assurance or Risk Management staff (for billing or regulatory concerns).
2. If the staff cannot help you, or if they are not a suitable resource for your concern, contact the Corporate Responsibility Officer (CRO). If you still cannot resolve your concern, contact the parent company's Corporate Vice President and Chief Corporate Responsibility Officer. The names and phone numbers for the CRO is made available with this booklet.
3. If the issue or question is still unresolved, or if you want to report a concern anonymously, call the 24-hour Ensemble Health Partners ReportLine at 1-844-604-9102 or log on to www.ensemblereportline.com to file a report using the Make a Report link. You may make a report without giving your name if you choose.

No retaliation for reporting concerns in good faith

Everyone working with Ensemble Health Partners has a duty to report, in good faith, concerns about potential violations of laws, regulations, standards or policies. This includes our associates, supervisors, volunteers and board members. No one who works with us should overlook violations. Our policy is that all real concerns should be reported.

We also forbid any retaliation against an individual for reporting a concern in good faith. Making a good-faith report will not put your job at risk. We protect every associate who reports a concern. Anyone who retaliates in any way is subject to immediate discipline. That may include being fired. Please report any retaliation or harassment at once to the CRO, the parent company's Corporate Vice President and Chief Corporate Responsibility Officer or the ReportLine.

An associate who breaks a law or standard is responsible, even if he or she comes forward and reports it. Each of us is responsible for our actions and their outcomes. However, we will view a prompt, truthful and sincere report of a wrong action as an effort to correct it.

Overview of code of responsibility and standards of responsible conduct

We each feel confident in our morals and values. We each uphold the professional guidelines that apply to our jobs. Sometimes, however, we might be unsure what to do. Our Code of Responsibility and the Standards of Responsible Conduct can guide us through these unclear areas. They are tools to help us make the decisions that best serve our patients and our organization. They also help us obey related laws and rules.

Six principles guide our Corporate Responsibility Program. They're based in our Core Values and reaffirm that we will meet all ethical, professional and legal duties. The Code of Responsibility outlines these six principles. Each principle leads to a series of Standards of Responsible Conduct. The Standards explain how we expect you to act to follow each principle. The Standards cover many situations. Please review them carefully. Refer to them when you have questions about proper business and professional conduct.

Duty to Comply with the Standards of Responsible Conduct. The Standards of Responsible Conduct apply to all Ensemble Health Partners associates and are mandatory. This includes the senior executives and finance officials covered by section 406 of the Sarbanes-Oxley Act of 2002. You must follow the Standards of Responsible Conduct that apply to you. It is the **“right thing to do.”** We also require it as a condition of your continued work with Ensemble Health Partners. Each of us is responsible to report to supervisors or to the CRO anything that appears to break the law or be in conflict with these Standards.

We take pride in doing what is expected, and we frequently do more than expected in our profession. But we sometimes face difficult choices. In those cases, these Standards can help us make the right decision. Whatever the motive — pressure to cut corners “just once,” or the demand to meet a budget or a tight deadline — there are no good reasons for not following the Standards of Responsible Conduct. Our managers and supervisors have two added duties within the Standards. They must ensure (by training, teaching, leading and monitoring) that the people they supervise follow the Standards of Responsible Conduct. They must resolve questions about applying the Standards before making a difficult decision.

As you read the Standards keep in mind:

- When we use “Ensemble Health Partners” or “our organization,” we mean Ensemble Health Partners and each of our facilities and/or organizations.
- When we use “associate,” we mean anyone who works with Ensemble Health Partners. This includes employees, board members, contractors doing business with Ensemble Health Partners and volunteers. “You” means all associates.
- The “Corporate Responsibility Officer” (CRO) is the Corporate Responsibility Officer or the parent company’s Vice President and Chief Corporate Responsibility Officer. When we use “Legal Counsel,” we mean the General Counsel for Ensemble Health Partners.
- Because the *Standards of Responsible Conduct* relate to the laws and rules that govern health care, they will change when the law or rules change. Ensemble Health Partners will communicate any changes as quickly as possible.
- Neither the *Code of Responsibility* nor the *Standards of Responsible Conduct* create or give any added employment rights to associates or others.

- Ensemble Health Partners client can add policies or standards above and beyond these *Standards of Responsible Conduct* as needed.
- Human Resources policies outline how employees may be disciplined for violating the *Standards of Responsible Conduct*. Contractors who violate them may have their contracts canceled.

With this booklet are the names and phone numbers for Corporate Responsibility Program contacts who can help you.







Ethical decision making

The goal of the Ensemble Health Partners Corporate Responsibility Program is to help you make ethical and professional business decisions. Use this model when you face choices or situations that make you uncomfortable. It will help you gather facts and reach a decision. Know where and when to ask for help. You can also use the 3-Step Process.

THINK about your starting point: Our mission is rooted in the commitment to empower each member of our team to realize their maximum professional potential and to create an environment conducive to our shared success, and helping our clients to achieve their revenue cycle goals. All of our associates must support our Core Values in every decision.

RECOGNIZE the issue involved in all of its aspects:

- The act itself (What is being asked or considered that troubles me?)
- The motives of all parties involved (Who will benefit?)
- The consequences (Will someone be hurt or injured? Does this violate a law, rule, policy or our *Standards of Responsible Conduct*?)
- The circumstances (Are there other important reasons or facts I need to consider to understand the dilemma and make the right decision?)

UNDERSTAND that Ensemble Health Partners wants each of us to do what is best for the largest portion of our community, all while following the ethical and legal rules that govern us. Any potential action that considers breaking a policy, rule or law — even for very good reasons — must be raised to an executive leader before any decision occurs.

SEEK help from the resources available to you:

- Your supervisor or other facility and system leaders
- Our *Standards of Responsible Conduct*
- Our Standards of Common Values
- The 3-Step Process
- Corporate Responsibility Department

These resources will offer sound advice and help you from getting trapped by personal biases or preferences and help you find the right decision.

TAKE responsibility for your actions and make the right decision with confidence. Remember, you are accountable for the outcome of your decisions. Know that we will always support an ethical decision you make following the Code of Responsibility and these *Standards*.

The image shows the front cover of a document. The background is a solid, vibrant green. A large, dark blue, almost black, geometric shape is positioned on the right side, extending from the top edge and pointing towards the left. This shape has a rounded top-left corner and a sharp right edge. The text 'Code of responsibility' is written in white, bold, sans-serif font, centered within the dark blue area. The text is arranged in two lines: 'Code of' on the top line and 'responsibility' on the bottom line. A thin white line runs diagonally from the left edge of the cover, starting at the middle height and extending towards the bottom right, ending just before the dark blue shape. This line forms a triangular shape with the green background, also featuring a rounded corner at its bottom-right end.

Code of responsibility

Ensemble Health Partners conducts its services in accordance with our core values, as well as our clients' shared statement of common values. We do so in accordance with our Statement of Common Values, Ensemble Health Partners Mission and Core Values. These values include core values of trust, integrity, loyalty and service. Our commitment to trust and integrity requires each person who works with Ensemble Health Partners to act with integrity and ethics. It also requires us to use resources with care. These form the foundation for the trust we build and maintain with those we serve. Each of us, from associates to contractors, has a duty to support ethical conduct through our Corporate Responsibility Program. Ensemble Health Partners expects all who work with us to act in keeping with these principles, based on our Core Values:

- **Act with honesty, integrity and ethics.** Demonstrate those traits at every level of leadership.
- **Use our resources to support our work, following our ethical and legal standards.**
- **Obey all laws and regulations.** These laws include antitrust, discrimination at work, environmental protection, false claims, fraud and abuse, lobbying and political activity and not-for-profit and tax exempt status.
- **Keep information about patients, associates and the organization confidential.**
- **Avoid what are, or seem to be, conflicts of interest in your actions and dealings with others.**
- Treat everyone with dignity and respect.

These principles seem like “second nature” to most of us. In some cases, you may still be unsure of what to do. The Standards of Responsible Conduct explain this Code in more detail. Use them to guide your ethical behavior.

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Standards of responsible conduct

Code of responsibility principle 1:

Our culture of honesty and integrity

Act with honesty, integrity and ethics. Demonstrate those traits at every level of leadership. Our associates represent our organization accurately and honestly. They do not act to defraud anyone of money, property or services. Our associates' conduct sets an example for co-workers. Supervisors set and enforce where needed ethical standards for everyone they supervise. The following Standards ensure that our activities reflect high levels of ethics and integrity. They show that we value ethical decision-making and that this is our normal practice. These Standards do not speak to every possible action. However, we expect your behavior will follow this principle. If you have questions about what this principle means or how to apply it, talk with your supervisor or Corporate Responsibility Officer.

Honest communications

Our associates communicate with honesty. This includes co-workers and those we serve. This also means our marketing and advertising accurately explains our services, level of licensure and accreditation.

Ethical culture

- Our associates follow all Standards of Responsible Conduct to support a corporate culture focused on ethics.
- Our associates report, in good faith, concerns about potential violations of the law or our Standards to their supervisors or CRO. Associates who raise issues and questions in good faith are valued. We will protect them from any retaliation for raising concerns in the Corporate Responsibility Program.
- Our supervisors must ensure that associates receive training and management support on all aspects of our Standards. Supervisors also monitor how their associates follow the Standards.

Cooperation with government investigations

Our associates obey all laws that apply to our operations. They cooperate with reasonable demands made in a Federal, state or local government investigation. We also protect the legal rights of Ensemble Health Partners, our organization and our

associates. Tell the Corporate Responsibility Department or the General Counsel at once if you learn Ensemble Health Partners is being investigated. Also, see your organization's policy for more details on how to deal with government investigators.

Employment of trustworthy persons

We maintain our ethical culture by hiring, promoting and contracting with people who are best qualified and who share our values. Federal law sets minimum standards for everyone we hire in positions of authority and contract with. In these cases, Ensemble Health Partners may not hire a person or entity that has been convicted of a health care-related crime [defined in 42 U.S.C.1320a-7(1)]. We also may not hire those who are debarred, excluded or are not eligible to take part in Federal or state-funded health care programs. Before offering a job, contract or privileges, check Federal, state medical databases of suspended, excluded and barred persons to confirm that a candidate meets this standard. Federal rules also require us to act if we learn that an associate, doctor or contractor has been convicted of a crime related to health care or has been debarred, excluded or judged not eligible to take part in Federal or state-funded health care programs. This may mean ending their job, privileges or contracts with any Ensemble Health Partners organization.



Code of responsibility principle 2:

Our culture of stewardship of resources

Use our resources carefully, to support our mission, following our ethical and legal standards. Our associates are entrusted with our resources to achieve our mission. Our associates have a duty to protect our resources — including our people, money, supplies, equipment and good name. They do so by making careful decisions about how our resources are used. They assure that our assets support our mission. Talk to your supervisor, CRO or use the 3-Step Process if you have questions about this principle.

Internal control

- Associates follow our standards and procedures to ensure that assets are protected and properly used. Keep accurate and reliable financial records and reports.
- Associates are responsible for acting within the authority they are given. Our supervisors give associates proper authority to carry out their duties. Supervisors also monitor their associates' use of that authority as needed.

Financial reporting

Associates ensure that our financial and cost reports, accounting records, research reports, expense accounts, time sheets and other financial documents clearly and accurately represent the facts. Improper or fraudulent accounting, documentation, or financial reporting is illegal under federal law, state law and health care programs.

Honoraria

We encourage our associates to teach and speak at educational functions related to your work. However, an outside group may not pay you for outside work you do during normal work hours. See your supervisor or Human Resources Department about how to handle such a payment if it is offered to you.

Travel and business expenses

Travel and business expenses for our associates follow our policies and reflect right use of our resources. Use good judgment and spend our organization's assets as carefully as you would spend your own. Business travel and meals should result in proper and reasonable payments. Review the Expense Reimbursement Policy for detailed guidance.

Personal use of organization assets

Our organization's assets are to be used only in our mission. You may not use them for personal business. You may not use our equipment, supplies, materials or services for any unauthorized purpose. Talk to your supervisor before using our organization's assets for any activity for which you will be paid by an outside source, or for any private, charitable project.

Record retention and destruction

- Keep records (paper or electronic) as required by law or business needs and according to internal policy. Talk to your supervisor about how long each type of record must be held. Keep accurate records for all business dealings. Make sure our records are not seen or used by people who have no right to see or use them. For records not specifically outlined in this policy, follow your supervisor's guidelines for keeping and destroying records.
- Never destroy records that you believe may be requested or that have been requested by a regulator or investigator. If anyone tells you to destroy records related to an investigation, contact the CRO or Legal Counsel before you do anything.

Code of responsibility principle 3: Our culture of legal and regulatory compliance

Obey all laws and regulations. We obey all laws and regulations that apply to our organization. This includes Federal, state and local laws and regulations, as well as our Statement of Common Values. These Standards guide our associates:

- Our associates obey all laws, regulations and guidelines that apply to their area of work. This includes laws and regulations that may not be mentioned in this booklet.
- Our supervisors and managers make sure all associates receive training in the laws and regulations that apply to their department or unit.

If you have any questions about the laws and regulations that apply, ask your supervisor, CRO, or Corporate Responsibility Department. Or call the ReportLine at 1-844-604-9102 or www.ensemblereportline.com to file a report. The 3-Step Process can help you make the right decision.

Fraud, abuse and the false claims act

Our associates work hard to ensure that we create accurate and truthful patient bills and submit accurate claims for payment from any payer, including Medicare and Medicaid, commercial insurance, or our patients. It's the right thing to do, reflects our mission and complies with federal and state laws that require accuracy in health care billing. The Federal False Claims Act (31 USC 3729-33) imposes civil penalties on any person or organization for knowingly making a false record or filing a false claim with the government for payment. "Knowing" can include deliberate or reckless ignorance of facts that make the claim false. Examples of activities that could trigger possible False Claims Act liability include:

- Billing Medicare for services that were not provided.
- Billing for services that were not ordered by a physician.
- Billing for services that were provided at sub-standard quality where the government would not pay.
- Keeping payments that are known to be overpayments or errors in payment that should be returned to the government.

A person who knows a False Claim was filed for payment can file a lawsuit in Federal Court on behalf of the government and, in some cases, get a reward for bringing

information about a violation to the government's attention. Penalties for violating the Federal False Claims Act can be up to three times the value of the False Claim, plus from \$5,500 to \$11,000 in fines per claim. Some states also have a False Claims Act that allows a similar lawsuit in state court if a False Claim is filed with the state for payment, such as under Medicaid or Workers' Compensation. The False Claims Act protects anyone who files a False Claim lawsuit from being fired, demoted, threatened or harassed by their employer for filing the suit. If a court finds that the employer retaliated, the court can order the employer to rehire the employee and pay the employee twice the amount of back pay owed plus interest and attorney's fees.

Our Corporate Responsibility Program supports compliance with the False Claims Act by:

- Monitoring and auditing to prevent errors in coding or billing.
- Educating our associates about their responsibility to report concerns about a possible False Claim at an Ensemble Health Partners facility via our 3-Step Reporting Process.
- Investigating all reported concerns and correcting any billing errors discovered.
- Protecting our associates from adverse action when they do the right thing and report any genuine concern to us via the 3-Step Reporting Process. Ensemble Health Partners will investigate any allegation of retaliation against an associate for speaking up.

Anti-Kickback law

The Federal Anti-Kickback Law says no one may offer, pay or receive payment of any kind (cash or anything of value) for referring patients for items or services paid for by Medicare and Medicaid. The law also applies to ordering items or services paid for by Medicare or Medicaid. We do not pay patients, physicians or other health care providers or professionals for referrals. Our associates may not ask for or accept payment of any kind or receive anything of value for a referral. The law is complex. It includes exceptions adopted by Congress and a number of "safe harbors" adopted by the Department of Health and Human Services. Please use the 3-Step Process for advice and assistance about the Anti-Kickback Law, exceptions or "safe harbors" before acting.

Stark self-referral statute

The Federal Stark Law prohibits a physician from referring patients to an entity with which the physician or his/her immediate family has a financial relationship for

designated health services reimbursed by Medicare or Medicaid unless all criteria of a Stark Law exception are satisfied. Designated health services cover a broad range of health care services including all of the following:

- Clinical laboratory services
- Physical therapy, occupational therapy, speech-language and pathology services
- Radiology and certain other imaging services (CT Scans, MRIs and ultrasounds)
- Radiation therapy services and supplies
- Durable medical equipment and supplies
- Nutritional supplies and equipment (feeding tube or IV products)
- Prosthetics, orthotics and prosthetic devices and supplies
- Home Health Services
- Outpatient prescription drugs and inpatient and outpatient hospital services

We recognize that our clients may have relationships with physicians that require compliance with the Stark Law. In some cases, we may be providing revenue cycle services to these clients that could possibly implicate the Stark Law. Entities that provide or perform services that are the result of a prohibited referral may not bill Medicare or Medicaid for those services. We comply with the Stark Law and require that all of our clients comply with the Stark Law as well. Please use the 3-Step Process to obtain advice and assistance about all Stark Law related issues and questions before acting.

However, this law may permit doctors to refer patients to these services, if the financial relationship meets certain standards. We obey the Stark laws and require that all physicians and other health care providers do so. Because the facts of each case will decide if referrals are allowed, report all Stark-related issues and questions using the 3-Step Process.

Billing accuracy

We send bills to patients and/or third-party payers (including Medicare, Medicaid, insurance companies, employers and others) that are accurate and that obey Federal and state laws and regulations. We are responsible for accurately coding and describing our services, treatments and charges. And true to our mission, we provide information on all bills to assist those in need to obtain financial assistance from us or others. We follow all special billing requirements for government-sponsored programs and other payers. We make accurate statements, spoken or written, to any government agency, intermediary or other payers. It is a fraud to mislead on purpose

any government agencies or other payers. Fraud may be punished with criminal or disciplinary action. If you find billing errors or actions that you believe may cause bills to be wrong or improper, report them right away, using the 3-Step Process.

Antitrust compliance

We conduct our health care business according to Federal and state antitrust laws. These complex laws are written to support competition. They help ensure that business agreements preserve reasonably free trade among organizations. Such laws generally forbid:

- Fixing prices, rigging bids or secret agreements (including price sharing) with competitors.
- Boycotts (including agreements with competitors to deal or not to deal with specific patients, providers or payers) and some exclusive dealing and price discrimination agreements.
- Unfair trade practices, including bribery, stealing trade secrets, deception, intimidation and similar unfair practices.
- Agreements with competitors on wages to be paid to their respective employees.
- Agreements with competitors to divide the market along product lines, service lines or geography.

The law also limits what kind of information we can share legally with our competitors or potential competitors. Information that may be covered by this law includes current or future fees, bids or negotiations, compensation or benefits, cost or financial projections, marketing or strategic plans, markets and market share, and plans to discontinue services or offer new services. When you face business decisions that may risk violating antitrust laws, please report your concerns using the 3-Step Process to obtain legal advice before acting.

Tax compliance

Ensemble Health Partners, though a separate and distinct company, is a member of multi-entity health care system. The parent holding company of that system is a tax-exempt, charitable organization which must follow a number of Internal Revenue Code rules to preserve that status. These include requirements concerning using resources exclusively to further the charitable purpose of providing health care services in a manner that is of public benefit to the communities served.

Ensemble Health Partners is not a tax-exempt organization but must operate by the same Internal Revenue Code rules that apply to tax-exempt members of the

system because, first and foremost, that is the just thing to do. In addition, for tax law purposes, Ensemble Health Partners's activities may be treated as those of certain tax-exempt members of the system and therefore those activities should follow the tax rules applicable to tax-exempt organizations.

The rules requiring use of assets for charitable purposes prohibit:

- Allowing any person in a position to control or influence substantially the direct or indirect operations of any tax-exempt organization from benefitting solely because of their position or influence or to share in profits of any tax-exempt activities;
- Paying to any person more than what is fair for services or goods;
- Participating in an arrangement such as a joint venture, partnership or similar dealing that provides unreasonable financial reward or other benefits to a third party at the expense of a tax-exempt organization;
- Employing or providing recruitment assistance for any employees, including physicians, with incentives or compensation plans that are excessive or do not support a charitable mission;
- Permitting any person to buy, sell, lease or use property of a tax-exempt organization at less than fair market value;
- Engaging in political campaign activity in support of or opposition to any candidate for Federal, state or local office; and
- Engaging in activities to influence the legislative process that exceed the limits on such activities imposed by the Internal Revenue Code on tax-exempt organizations.

Environmental compliance

We obey environmental laws and rules in our operations. We follow accepted procedures for handling, storing, labeling, using, transporting or disposing of solid, liquid, hazardous and infectious wastes. We do this for our safety and the safety of our clients. Our associates need to be familiar with all procedures that apply. They use resources properly and efficiently and recycle materials where possible. They report promptly to supervisors (and response teams where required) any spills or contamination that may affect the environment.

Labor and employment law compliance

We provide services to everyone without regard to race, color, religion, ethnic origin, sex, marital status, public assistance, disability, age or any other category prohibited by law. We attract and retain the most qualified associates to fulfill our mission. We

ensure a workplace that supports excellence and the health, safety, privacy and comfort of all associates. Ensemble Health Partners fully supports the laws prohibiting harassment and discrimination because of, but not limited to, race, color, ethnicity, religion, sex, national origin, sexual orientation, age, ancestry, disability, veteran era status, or any person with HIV infection, whether asymptomatic or symptomatic, or AIDS or in any manner prohibited by the laws of the state and the United States in the recruitment, selection, promotion, evaluation or retention of employees or volunteers. We obey all labor laws and rules that apply. Generally, these laws forbid:

- Employment that violates wage and hour rules or employment of non-U.S. persons who cannot document their eligibility for employment, or
- Employment of non-trustworthy persons.

Please report any discrimination or harassment at once to Human Resources Department or use the 3-Step Process. We investigate promptly and thoroughly, following Human Resources policies and procedures. We will discipline anyone who violates harassment or discrimination policies.

Sarbanes-Oxley Act compliance

Associates are responsible for the accuracy of records and reports and must honestly and accurately report all business transactions. The accuracy of the information is essential to Ensemble Health Partner's ability to meet legal and regulatory obligations. As such, all Ensemble Health Partners' books, records and accounts will be maintained in accordance with all applicable regulations and standards, and will accurately reflect the true nature of the transaction. All Ensemble Health Partners' financial statements will meet generally accepted accounting rules and our own accounting policies. Furthermore, Ensemble Health Partners prohibits the following actions:

- Establishment of an undisclosed or unrecorded account or fund;
- Entry of false or misleading information in Ensemble Health Partners' books or records; and
- Disbursement of corporate funds or other corporate property without sufficient supporting documentation.

Ensemble Health Partners will provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the Securities and Exchange Commission and in other public communications.

Code of responsibility principle 4:

Our culture of trust with sensitive information

Keep information about patients, associates and the organization confidential. Our associates see a wide range of information that is confidential, sensitive or proprietary. This includes information we create and own or that is owned by others and provided to us. The information may be in many forms, including paper or electronic records, voice mail or in a person's memory. Giving out this information could harm individuals, our business partners and our organization.

Our associates must protect this information from being revealed or used without proper approval. They are to use such information only for the benefit of the patient and our organization. If you have questions about this principle, talk with your supervisor or use the 3-Step Process. These Standards will help guide you:

Personal and patient information

Our associates keep personal and patient information confidential, obeying the Federal laws and rules that apply to privacy and security including HIPAA (Health Insurance Portability and Accountability Act) and more stringent state laws. They prevent the release of any personal or confidential information about a patient unless it is needed for lawful business or patient care. They also do not need to seek information about any patient if you do not need it to complete your duties.

Proprietary information

- Our associates must protect the information, ideas and intellectual property of Ensemble Health Partners from use or release without permission. This includes information about our competition or business strategies, contract terms or negotiations, payments and reimbursements, internal policies and procedures and information about negotiations with associates or other organizations. We protect this information and share it only with associates who need it to perform their duties.
- Our associates must use, preserve and protect intellectual property. This includes patents, trademarks or copyrights, and programs, software or information owned by other organizations, following the terms of our license or other agreement to use this property. We also must use and protect confidential information or data owned

by others that is given to us for our use, such as client lists, price lists, contracts or documents, following any terms we agreed to when we received the information.

- Our associates may not use confidential information that they obtain from competitors in violation of a non-compete agreement, prior employment agreement or other contract.

Personnel records and information

Some jobs require access to other associates' personnel files or other confidential information. This puts a special obligation on associates to make sure this information is used or released only with proper authorization. Improper access, release, or use of this information can harm our associates, our organizations and Ensemble Health Partners. However, nothing in this section is intended to prevent associates from voluntarily discussing employment matters.

Peer review information

Peer review information must be protected, according to Federal and state laws and rules and our organization's policies. These laws and rules protect this confidential information so that health providers can talk openly and honestly about professional performance. They also protect our organization and our efforts to safeguard this information. If you have questions about which peer review information may be protected, ask, using the 3-Step Process if needed, before you share the data with anyone outside of our organization.

Business communication — eavesdropping, wiretapping or interception

State and Federal laws regulate wiretapping, eavesdropping and other forms of observing people by electronic means. Our policy is to obey all such laws that apply to our business. It is against the law to use any electronic, mechanical or other device to monitor, copy or obtain the contents of any telegraph, telephone, facsimile, modem-transmitted email or other communications unless one (or sometimes all) of the parties involved agree to it. You can violate the law merely by listening in on a conversation, even if you take no notes or make recordings. Unless you receive approval ahead of time, you must do one of three things if you pick up a phone that is in use by others.

1. You may listen to the call if you received prior permission to listen from every party on the call;
2. You must identify yourself at once so that every person on the call knows that you are on the line; or
3. You must hang up at once.



Code of responsibility principle 5:

Our culture of transparency to avoid conflicts of interest

Avoid what are, or seem to be, conflicts of interest in your actions and dealings with others. Our associates work to further the Ensemble Health Partners' mission and client services. They use their positions to benefit our organization, not for personal benefit or profit. Associates must avoid any conflicts of interest or what may appear to be conflicts of interest. Associates must also report any potential conflicts of interest that would cause a reasonable person to question their motive. Associates must report any real or potential conflicts of interest before acting in a way that might seem to be a conflict of interest. If you have questions about conflicts of interest, ask your supervisor or use the 3-Step Process to obtain help. These Standards can guide you.

Outside interests and activities

- Our associates or their immediate family members should not have an interest in any outside organization from which any Ensemble Health Partners entity buys goods or services or that competes or does business with us. Ownership, financial interest or having an employment, consulting or management position may be considered an "interest." Review our Conflicts of Interest Policy, or use the 3-Step Process to clarify how this policy may affect you.
- Our associates may not compete, either directly or indirectly, with any services, products or plans that any Ensemble Health Partners organization offers. If you learn of a business opportunity that may interest Ensemble Health Partners or our parent organization, let your supervisor know. You must give us the chance to take part in the opportunity before you take part in the opportunity.
- Associates who want to do extra work with an entity that does business with us must obtain their supervisor's approval before doing so. If you obtain permission to moonlight with an outside entity, you must be sure the outside entity does not use your Ensemble Health Partners position or title to suggest a business relationship with Ensemble Health Partners or our organization.
- Our associates do not lend or borrow money or anything of value from a patient, individual or entity that does business with us, except if it is on the same terms offered to the general public.

Gifts, entertainment and discounts

We conduct our business fairly. We do not offer, ask for, accept or give gifts, services, improper discounts, kickbacks or other things of value to influence the business actions of any supplier, vendor, customer, contractor, government official or other associate. Tell your supervisor or CRO about any personal or family relationship with an entity that is a current or potential vendor or contractor. Use the 3-Step Process to report any offer or request to you for a gift, discount or kickback to influence your business decisions.

Our associates may not ask for money, rewards, gifts or any other thing of value from patients or their family members, or from contractors (except as approved for charity fund raising). Our associates may not accept money or rewards, or a gift that has more than a token value, from patients or their families. If a patient or family member wishes to give more than a token amount of money as a gift, refer them to our Foundation or other appropriate office for charitable donations.

Inside information

Our associates do not use our business information for their personal profit or advantage. They also do not give any such information to anyone for any reason that's unrelated to performing their job duties.

Participation on outside boards of directors

We encourage our associates to take part in the civic and social affairs of their communities. This may include serving on the boards of directors of various charitable, civic or fraternal organizations. When serving on such boards, remember:

- Obtain your supervisor's approval before serving on the board of directors of any organization that may have interests that conflict with ours.
- Do not discuss or vote on any matter that might affect the interests of Ensemble Health Partners or our parent organization.
- When you speak as a board member, be sure you are not identified as speaking on behalf of Ensemble Health Partners or our parent organization, unless you are given permission to do so.

- Be sure you follow your organization's policy on payment from outside groups, especially if your board duties require you to perform board work during your regular work hours.

Ensemble Health Partners or your organization can withhold or withdraw consent for you to serve on outside boards or organizations if it would conflict with Ensemble Health Partners' interests. If you think your board duties might present a conflict of interest, ask your supervisor or use the 3-Step Process to obtain an answer.



Code of responsibility principle 6:

Our culture of dignity and respect for all

Treat everyone with dignity and respect and provide quality service.

- Our associates treat every person, including the clients we serve and other associates, with dignity and respect. We recognize each person's worth, value and status.
- Our associates understand that associates and clients must be allowed to express grievances or complaints and we will endeavor to resolve any grievances or complaints in a timely manner.

Certification



I acknowledge that I have received a copy of the Ensemble Health Partners Corporate Responsibility Program Core Values in Action booklet and I agree to read it and discuss it with my supervisor, team leader or other managers.

I certify that I will comply with the Code of Responsibility and Standards of Responsible Conduct, and any other standards or policies set by my organization, throughout my association with Ensemble Health Partners.

I attest it is my responsibility to hold confidential any protected personal health information (PHI) and/or financial information of Ensemble Health Partners or its clients that would be accessible as part of my job now and in the future. I recognize it is my responsibility to report immediately any instances of lost, stolen or inappropriately accessed or disclosed PHI or financial information to the Ensemble Health Partners Corporate Responsibility Officer and/or designated Privacy Officer.

I attest it is my responsibility to identify and disclose any Conflicts of Interest (COI) that would impact my job now and in the future. I recognize it is my responsibility to report any conflicts via the organization's COI form or report the conflict to the Ensemble Health Partners Corporate Responsibility Officer.

I also certify that I am not barred from taking part in Federal or State-Funded healthcare programs; and I agree to inform the Ensemble Health Partners Corporate Responsibility Officer if this occurs while I am associated with Ensemble Health Partners.

Name: _____
[please print]

Department: _____

Organization: _____

Signature: _____

Date: _____

Please complete this certification and submit it to your Ensemble Health Partners training facilitator or the Ensemble Health Partners Corporate Responsibility Officer as documentation of your attendance at this compliance program orientation session and your receipt of the Ensemble Health Partners Corporate Responsibility Program Core Values in Action booklet. **Thank you.**

Core Values in Action



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