



The Jewish Hospital 



Corporate Responsibility: Core Values in Action

COMPASSION | EXCELLENCE | HUMAN DIGNITY
JUSTICE | SERVICE | SACREDNESS OF LIFE

Our mission

The Jewish Hospital is a community hospital faithful to its Jewish heritage and grounded in the Jewish and Catholic traditions of service to the community. Our purpose is to reveal God's love to all, especially the poor and vulnerable, through the delivery of compassionate healthcare services and the education of healthcare professionals.

Our values

The Jewish Hospital demonstrates behaviors reflecting our Core Values of compassion, excellence, human dignity, justice, sacredness of life and service.

Our promise

To make lives better—mind, body and spirit.
To genuinely enjoy being of service.
To make healthcare easier.

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Certification and contact information are made available with this booklet.

Letter from the president & CEO

Mercy Health is a dynamic, growing organization of dedicated people working together to achieve our mission: To extend the healing ministry of Jesus by improving the health of our communities with emphasis on people who are poor or under-served. Our Core Values of compassion, excellence, human dignity, justice, sacredness of life and service demonstrate the behaviors that bring our mission to life.

As an organization, I believe we always strive to do the right thing — to be service-oriented, good stewards of the resources given to us, respectful, trustworthy and responsive to the needs of others. In today's tumultuous environment, health care organizations are accountable to many: To our patients and communities, the government, other payers and each other. Mercy Health has developed tools to help each of us meet these 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 put our Core Values in action every day, in every job, in every facility and organization that makes up Mercy Health.

That is why we have willingly created our Corporate Responsibility Program. It is an age-old approach or philosophy for doing what's right in order to fulfill our ultimate mission. "Doing the right thing always" is not a new policy or concept at Mercy Health. It is grounded in our values — our tradition of service and ministry — those qualities that attracted us to work here. We are rededicating ourselves to living our Core Values, and better documenting how we help to maintain a culture where "doing the right thing" is what we are known for.

The effectiveness and ultimate success of the Corporate Responsibility Program will require your commitment and personal support. Corporate Responsibility has my complete support, and I know you will find it to be a trusted resource for putting our Core Values into action.

John M. Starcher, Jr.

President & Chief Executive Officer
Mercy Health

Corporate Responsibility Program





Introduction

The Jewish Hospital's mission is to be a community hospital faithful to its Jewish heritage and grounded in the Jewish and Catholic traditions of service to the community. Our purpose is to reveal God's love for all, especially the poor and vulnerable, through the delivery of compassionate healthcare services and the education of healthcare professionals. To achieve our mission, we commit to Core Values of compassion, excellence, human dignity, justice, sacredness of life and service in all 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 into action, in particular our commitments to excellence, human dignity and justice.

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 healing ministry. 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 Mercy Health 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 health care make our Corporate Responsibility Program critical for our success. We must provide quality care more efficiently. We must manage costs. We must obey growing numbers of Federal, state and local laws and rules. We also accept our duty to use taxpayers’ money wisely, and to serve effectively and efficiently so we can do more for those we serve.

The stakes are high. Improper action could hurt our well-deserved reputation for integrity, quality patient care and the trust we’ve worked so hard to earn with those we serve.

Goals

The Mercy Health 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 market senior management team and oversees daily Program activities. Each CRO works closely with the Mercy Health Vice President and Chief Corporate Responsibility Officer, who designs, coordinates and reports on the effectiveness of the Program to the Mercy Health Board, Board Audit and Corporate Responsibility Committee and is responsible for the overall Program. CROs also work closely with the market and Mercy Health General Counsel for oversight of legal issues for the organization. Your CRO's name and contact information are made available with this booklet.

About the Mercy Health ReportLine

You may call or report on-line through the Mercy Health 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.



How to direct questions and report concerns: 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 Mercy Health *Standards of Responsible Conduct*. In many cases, we have processes in place to resolve concerns or obtain answers to questions (for example, HR or Occupational Health). 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 clinical or regulatory concerns).
2. If the staff cannot help you, or if they are not a suitable resource for your concern, contact your Corporate Responsibility Officer. Each Mercy Health market has a CRO who can help you. If you still cannot resolve your concern, contact the Mercy Health Vice President and Chief Corporate Responsibility Officer. The names and phone numbers for CRO contacts are 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 Mercy Health ReportLine at 1-888-302-9224 or log on to www.mercyhealthreportline.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 Mercy Health has a duty to report, in good faith, concerns about potential violations of laws, regulations, standards or policies. This includes our associates, supervisors, physicians, 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 your CRO, the Mercy Health Vice President and 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, 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 Mercy Health 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 Mercy Health. 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 ministry. 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 “Mercy Health” or “our organization,” we mean the entire Mercy Health system and each of our markets and local health ministries, facilities and organizations.
- When we use “associate,” we mean anyone who works with Mercy Health. This includes employees, board members, contractors doing business with Mercy Health, volunteers and health care providers with privileges at any Mercy Health facility. “You” means all associates.
- The “Corporate Responsibility Officer” (CRO) is the market Corporate Responsibility Officer or the Mercy Health Vice President and Chief Corporate Responsibility Officer. When we use “Legal Counsel,” we mean the Market Legal Counsel for your organization or the Mercy Health General Counsel.
- 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. Mercy Health 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.
- Mercy Health markets 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*. Providers who violate these *Standards* may lose privileges. Contractors who violate them may have their contracts canceled.

Along 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 Mercy Health 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 to extend the healing ministry of Jesus. Our ethical vision and values are rooted in the Bible. Even though all associates may not share our faith, they 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 Mercy Health 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*.
- The *Ethical and Religious Directives for Catholic Health Care Services*.
- The 3-Step Process.

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*.

Code of responsibility

The background of the page is a solid blue color. In the lower half, there are several overlapping, wavy, horizontal bands of different shades of blue and green, creating a layered, landscape-like effect. The text 'Code of responsibility' is positioned in the upper right quadrant, rendered in a white, sans-serif font.

The Jewish Hospital serves the community by improving the health of our communities, especially people who are poor and under-served. We carry out our ministry following the Ethical and Religious Directives of the Roman Catholic Church, the Mercy Health Mission and the Mercy Health Core Values. These values include compassion, excellence, human dignity, justice, sacredness of life and service.

Our commitment to excellence and justice requires each person who works with Mercy Health and our markets 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 and medical staff to contractors, has a duty to support ethical conduct through our Corporate Responsibility Program.

Mercy Health 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 healing mission, 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 and provide quality, holistic care.**

These principles seem like “second nature” to most of us. However, 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.



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 Mercy Health, our organization and our associates. Tell your CRO, Legal Counsel, the Mercy Health Vice President and Chief Corporate Responsibility Officer or the Mercy Health General Counsel at once if you learn a Mercy Health organization is being investigated. 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, Mercy Health 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 Mercy Health organization.

Code of responsibility principle 2: our culture of stewardship of resources

Use our resources carefully, to support our healing mission, following our ethical and legal standards.

Our associates are entrusted with our resources to achieve our healing 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 healing mission. Talk to your supervisor or CRO if you have questions about this principle. Use the 3-Step Process.

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 Travel and Business Expenses policy for detailed guidance.

Personal use of organization assets

Our organization's assets are to be used only in our health care 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 your 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 the *Ethical and Religious Directives for Catholic Health Care Services*. 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 the Mercy Health Vice President and Chief Corporate Responsibility Officer. Or call the ReportLine at 1-888-302-9224 or www.mercyhealthreportline.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 faith-based 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 a Mercy Health 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. Mercy Health 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



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 physicians 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

Mercy Health is a not-for-profit, tax-exempt entity. It is organized and operated solely for our religious and charitable purposes and to serve the communities where we're located. We must ensure that our resources are used only for our charitable purposes, not for any private individual, in order to keep our tax-exempt status. Tax laws forbid conduct such as:

- Paying “excess benefits” to any person or taking part in any joint venture, partnership or similar dealing that can bring an improper private benefit to a third party working with us.
- Recruiting physicians with incentives or compensation plans that are excessive and do not support a charitable mission.
- Accepting research grants from third parties where the researcher keeps the funds for personal use, and we are not paid for the researcher's use of our time, equipment or facilities.
- Permitting any person to buy, sell, lease or use our property at less than fair market value.
- Engaging in forbidden political activity for any Federal, state or local political candidate, party organization or committee, including:
 - Donating our organization's money, property, and use of our facilities or the services of our associates.
 - Making spoken or written endorsement from our organization.
 - Fundraising by our organization.
- Engaging in substantial lobbying. This includes communicating or acting in the name of Mercy Health or our organizations, without consent, to influence the making of laws.

Environmental compliance

We obey environmental laws and rules in our health care 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 associates and our patients. 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 care for patients and residents, and serve 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 health care mission. We ensure a workplace that supports excellence and the health, safety, privacy and comfort of all associates. Mercy Health 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.



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 Mercy Health 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 Mercy Health. 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 Jewish Hospital Mission and our healing ministry. 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 Mercy Health 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 Mercy Health organization offers. If you learn of a business opportunity that may interest Mercy Health or our 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 Mercy Health position or title to suggest a business relationship with Mercy Health 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 fundraising). 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 Mercy Health or our organization.
- When you speak as a board member, be sure you are not identified as speaking on behalf of Mercy Health or our 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.

Mercy Health or your organization can withhold or withdraw consent for you to serve on outside boards or organizations if it would conflict with Mercy Health's 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, holistic care.

Our associates treat every person — including those we serve and other associates—with dignity and respect. We recognize each person's worth, value and status.

Our associates make decisions to admit, treat, transfer and discharge based on the medical findings of what is best for each patient, resident or client. Our associates do not base decisions on the financial status of the patient, resident, client or the organization.

Our associates follow the *Ethical and Religious Directives for Catholic Health Care Services* and encourage our patients, residents and clients to participate in considering ethical issues that arise in their care.

Our associates understand that patients, residents and clients must have reasonable access to care based on what is best for them. We are dedicated to quality, holistic service in our ministry that addresses health and wellness, as well as healing for the mind, body and spirit.

Our associates will help our patients, residents and clients to manage their pain through appropriate and timely assessments and pain management care.

Our associates understand that patients, residents and clients must be allowed to express grievances or complaints and we will endeavor to resolve any grievances or complaints in a timely manner.

The responsible physician or other licensed independent practitioner will clearly explain the outcome of any treatment or procedure to our patients, residents or clients, and to their families when appropriate, especially if outcome differs significantly from expected results.

Certification



I acknowledge that I have received a copy of the Mercy Health Corporate Responsibility Program 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 Mercy Health.

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 my Corporate Responsibility Officer.

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

Name: _____
[please print]

Department: _____

Organization: _____

Signature: _____

Date: _____

Please complete this certification and submit it to your training facilitator or Corporate Responsibility Officer as documentation of your attendance at this orientation session and your receipt of this booklet. **Thank you.**

A Catholic healthcare ministry serving Ohio and Kentucky

The Jewish Hospital



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