

Code of Conduct





MISSION

We reveal and foster God's healing love by improving the health of the people and communities we serve, especially those who are poor and vulnerable.

VISION

Inspired by our faith, we will partner with our patients and communities to exceed their expectations for health.

VALUES

Caring Spirit — We honor the sacred dignity of each person.

Excellence — We set and surpass high standards.

Good Humor — We create joyful and welcoming environments.

Integrity — We do the right thing with openness and pride.

Safety — We deliver care that seeks to eliminate all harm for patients and associates.

Stewardship — We are accountable for the resources entrusted to us.



Dear Associates and Partners,

At SCL Health, we are dedicated to providing the highest standard of care aimed at achieving quality outcomes, a safe and supportive environment and the best possible experience for our associates and our patients. This dedication continues to shine in the work we are committed to with our Mission Forward 2025 strategic plan. How we conduct ourselves professionally is foundational to ensuring the long-term success of our ministry.

An essential part of how we continue our ongoing commitment to excellence includes establishing and holding ourselves accountable to our Code of Conduct. This Code helps introduce our associates and partners to the laws, rules and ethical standards that we all agree to as a part of the SCL Health team or network.

By abiding by these rules and regulations, we are safeguarding our own integrity as well as living out our organizational value of Integrity. Thank you for continuing to uphold the high standards that we commit ourselves to as an integral part of SCL Health.

Lydia Jumonville
President & CEO

Joanne Davidson
Chief Integrity & Compliance Officer

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What is the Code of Conduct?

The Mission, Vision and Values of SCL Health serve as our compass.

The SCL Health Code of Conduct is the road map that helps us stay on course with those values and principles.

Why Do We Have a Code and Why Must We Follow It?

We conduct our work in a highly regulated and complex environment and it is important to remember that our ministry can only exist if we uphold our legal and ethical responsibilities. This Code of Conduct introduces our associates and partners to the various areas of the laws, rules and ethical standards requiring our focus and understanding. Of course, no code of conduct can cover every possible situation. Whenever you become aware of a violation of the Code of Conduct, SCL Health policy or the law, you have a responsibility to speak up to address the problem and prevent future occurrences.

Who Must Follow the Code?

The standards in the Code of Conduct apply to all SCL Health associates. In any instance where business partners, consultants or contractors provide services, we ask that they be respectful of and comply with areas of the Code of Conduct that pertain to the services they provide to SCL Health. If you supervise our business partners, contractors or consultants, you are responsible for communicating these standards and for evaluating those aspects of the Code of Conduct that apply to the services they provide.

If you have a management role, you have additional responsibilities to serve as a positive role model and to help your associates review, understand and apply the Code of Conduct. You should model the SCL Health Leadership Behaviors and maintain an environment where no associate feels pressured to do something against the law or in conflict with our ethical standards or their own personal integrity.

Each of us is responsible for acting with integrity. This is at the center of our mission and is especially necessary when we encounter difficult situations. Meeting our ethical and legal responsibilities helps us put the needs of our ministry first.

Each of us must:

- Know and obey the law.
- Know and follow the Code of Conduct and applicable policies and procedures.
- Complete required training in a timely manner.
- Keep up-to-date on current standards and expectations.
- Promptly report concerns or possible violations.
- Fully cooperate with investigations.





Making the Right Decision

If you are faced with a difficult situation, ask yourself, *"Is my behavior...*

- 1 *Consistent with our Code of Conduct, policies and procedures?*
- 2 *The right thing to do in light of our Mission, Vision and Values?*
- 3 *Ethical and does it promote integrity in my workplace?*
- 4 *Something that I and my patients, family members and colleagues can be proud of?"*

If you answered "No" to any of these questions, it's time to ask for help.



Ethical and Religious Directives for Catholic Healthcare Services

SCL Health care sites that are sponsored by Leaven Ministries follow the Ethical and Religious Directives for Healthcare Services (ERDs) as approved by the United States Conference of Catholic Bishops, as applied by the diocesan Bishop, and as amended from time to time. The ERDs provide additional ethical standards and guidance for conduct and care delivery in Catholic-affiliated institutions.

Where Can We Go for Advice and Guidance on Our Code of Conduct?

You are not alone! We have processes, guidance and procedures in place to help you follow the Code of Conduct, SCL Health policy and the law. Take advantage of the breadth of capabilities, resources and expertise that exist within SCL Health, including:

- Managers, Directors and Senior Leadership
- Human Resources
- Legal Services
- Integrity & Compliance
- Internal Audit Services
- Quality
- Risk Management

LEARN MORE

For ERDs: Visit the Ethics section on [The Landing](#).

For specific questions: Reach out to your local mission council member or see the [Mission](#) page on [The Landing](#) for contact information.





The Integrity & Compliance Program

Our Integrity and Compliance Program provides structure, support and protection to our health system. The program ensures that we can use our assets and resources for the benefit of our patients and communities. Understanding how the elements of our Integrity and Compliance Program work gives us confidence in being open and honest when it is necessary to address an issue or concern.



Program Structure

Standards & Policies

Our Code of Conduct, policies and procedures provide specific guidance for SCL Health associates. All associates are required to read and acknowledge this Code of Conduct, access policies on [The Landing](#) and seek other resources described in this Code of Conduct.

Oversight

Our Integrity and Compliance Program is a part of each and every level of our health system. The SCL Health Board of Directors leads this program, and our executives direct its implementation. This includes our health system's President and CEO and the Chief Integrity and Compliance and Privacy Officer. In addition, there are Care Site Compliance and Privacy Officers as well as Compliance Committees for each care site. You can find more information, including how to contact the Compliance and Privacy Officers at each location, on the [Compliance](#) page on The Landing.

Education & Training

Our Integrity and Compliance Program cannot be successful without education and training. We provide new associates with one hour of compliance training upon hire and all existing associates with annual training. Additionally, certain departments, such as billing and coding, require more advanced training. SCL Health provides and tracks much of this education in our online learning management system.

Auditing & Monitoring

We regularly monitor key functions, systems and processes. We report the monitoring results to the compliance committees. If corrective changes are necessary, the Integrity and Compliance Department assesses the corrective action and tracks its completion. In addition, the Internal Audit function tests compliance with legal requirements and SCL Health policies. We report these activities through the SCL Health Board of Directors' Audit, Organizational Integrity and Compliance Committee.

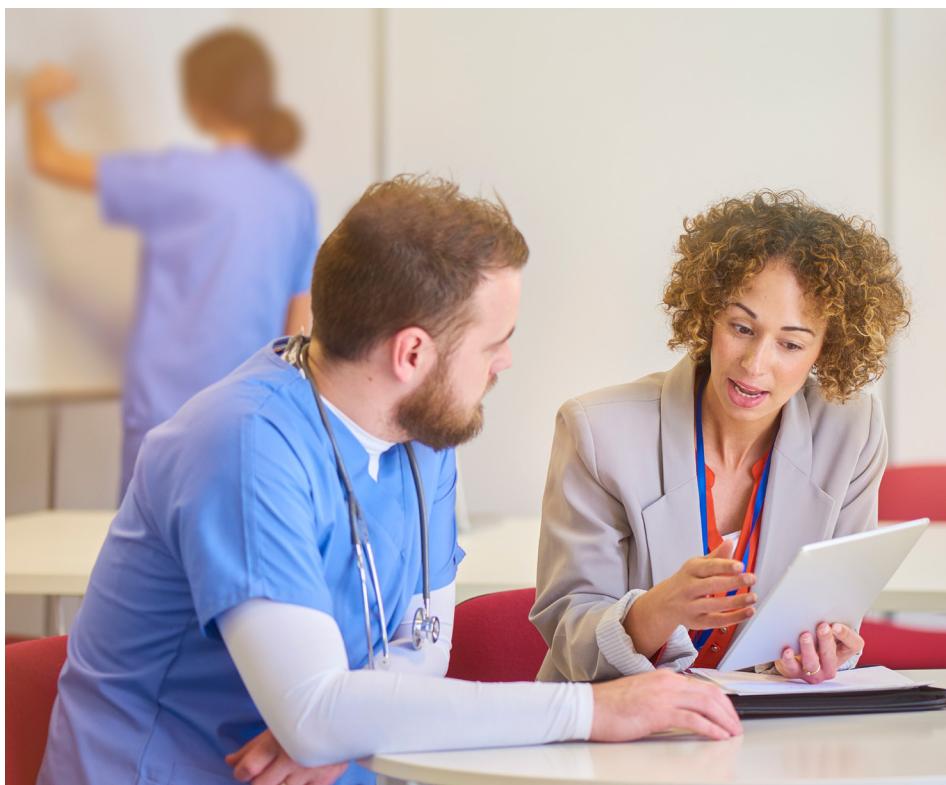
Internal Investigation of Reports

All associates must report any identified compliance issues. Reported issues are investigated, reviewed and resolved in a way that is timely and appropriate. If necessary, corrective action is

implemented to ensure that any wrongdoings are not repeated. When required, we make disclosures and give reports to government agencies. Each of us is expected to cooperate with investigation efforts.

Enforcement & Discipline

SCL Health takes violations of the law, regulations and the Code of Conduct very seriously. We investigate each reported potential violation by reviewing the facts and circumstances, and apply appropriate discipline based on the results of the review. Disciplinary actions include verbal and written corrective action up to and including involuntary separation from employment. The level of discipline depends on the nature, severity and frequency of the violation.





Reporting

It is the obligation of all associates to report fraud, misconduct and noncompliance. The Integrity and Compliance Program provides many ways for associates to report concerns without fear of retaliation.

We encourage resolution at the local level relating to human resource issues, such as concerns about payroll, personality disputes or disagreements with supervisors. It is also appropriate and encouraged that you bring safety, quality or compliance-related concerns to the attention of your supervisor or other manager at the local site first. If you are not comfortable reporting to your supervisor, or it is not appropriate to do so, you may report your concerns to a Human Resource

Please report your concerns in a timely manner so we can promptly investigate and help resolve any issues.

Manager, the Care Site Compliance and Privacy Officer or another member of local management.

You can also report concerns by calling the Compliance Hotline at **1-877-393-6752** or online at sclhealth.alertline.com. Please report your concerns in a timely manner so we can promptly investigate and help resolve any issues.

SCL Health makes every effort to keep a reporter's identity confidential when the individual wishes to remain anonymous. We do not tolerate retaliatory behavior or disciplinary action against an individual who has reported a concern or suspected violation in good faith. Certain federal and state laws, including the federal False Claims Act, protect those who speak up in good faith from retaliation. Anyone who deliberately makes a false accusation in order to harm or retaliate against a co-worker is subject to discipline.



If you work at an accredited care site, you can also report concerns about safety or quality of care without retaliation or punitive action to The Joint Commission at https://www.jointcommission.org/report_a_complaint.aspx.

Quality & Patient Care

Quality of Care and Patient Safety

At SCL Health, we understand that our patients are unique individuals. We serve with a Caring Spirit honoring the sacred dignity of each person. We work to provide person-centered care in a safe, effective and efficient manner. To encourage this effort, we build and design systems and processes that incorporate best practices in caring for our patients. Our leaders also encourage a culture of patient safety and use principles of high reliability to prevent error.

Patient Rights

While patients are in our care, we are committed to informing them of their rights. We expect our associates to uphold and respect these rights.

Patients are provided with a written statement of their rights and a notice of privacy practices. These statements include the rights of a patient to make decisions regarding their medical care, the right to refuse or accept treatment, the right to informed decision-making and a patient's rights related to their health information maintained by SCL Health.



Emergency Medical Treatment & Labor Act (EMTALA)

SCL Health complies with the Emergency Medical Treatment and Labor Act (EMTALA). We screen and provide stabilizing treatment to everyone who comes to an SCL Health hospital requesting examination or treatment for an emergency condition. We do not delay medical screening exams or stabilizing care in order to request patient financial information. We transfer emergency patients only when they request a transfer or when we lack the capability or the capacity to provide appropriate treatment, and only after administering the appropriate stabilizing care.

We do not delay medical screening exams or stabilizing care in order to request patient financial information.



NOTICE OF PRIVACY PRACTICES

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

WHO WILL FOLLOW THE PRIVACY PRACTICES IN THIS NOTICE

We provide health care to our patients and residents together with physicians and other health care providers. This Notice of Privacy Practices ("Notice") describes how we will use and disclose your medical information. The privacy practices described in this Notice will be followed by SCL Health St. Mary's and its contractors, agents, and business associates.

Patient Privacy

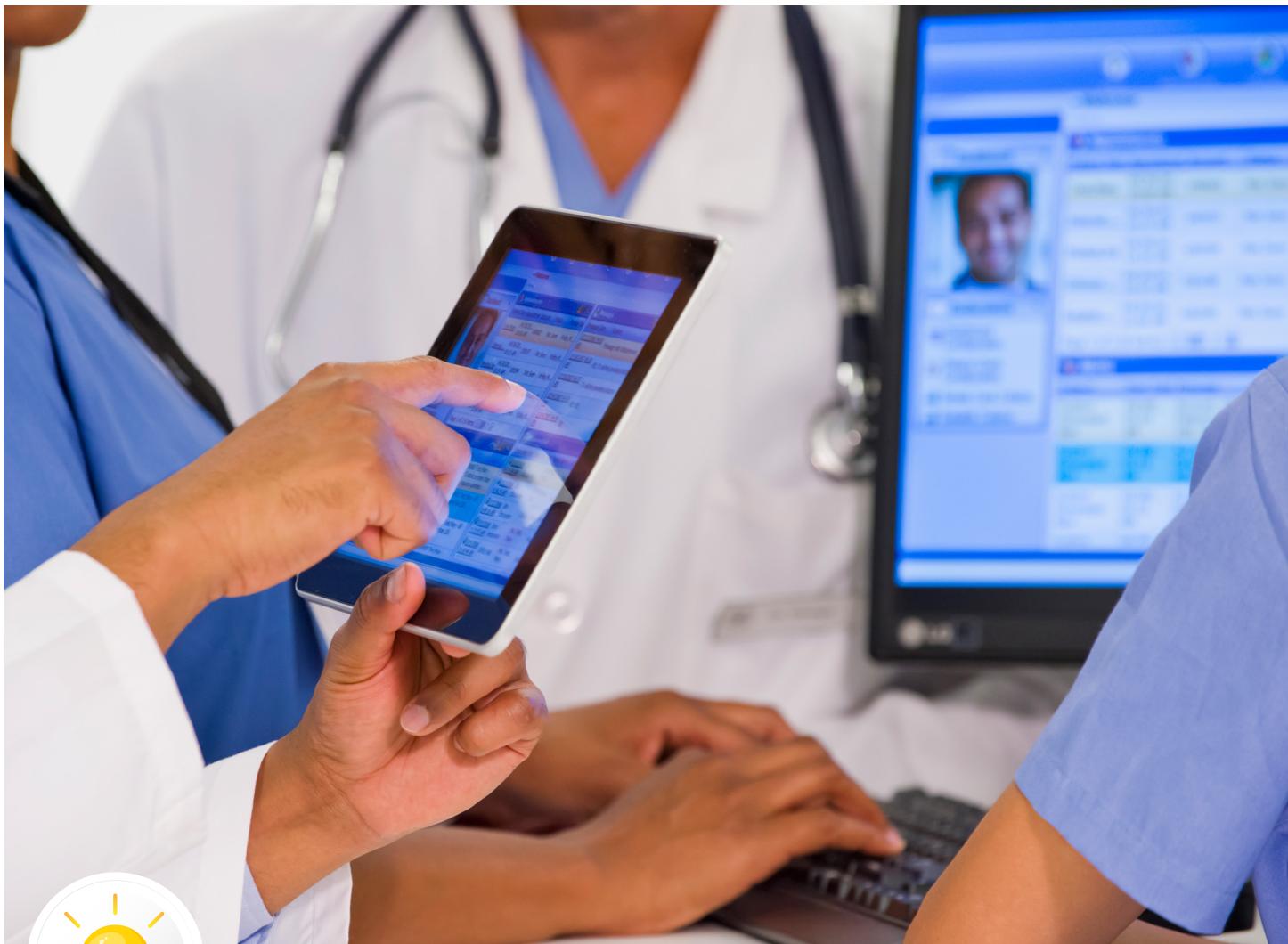
SCL Health treats the protected health information (PHI) of patients with special care. There are numerous federal and state laws that protect the privacy and security of a patient's information, including the **Health Insurance Portability and Accountability Act of 1996** (HIPAA) and the **Health Information Technology for Economic and Clinical Health** (HITECH) Act. We collect PHI to provide quality care and service and will protect access to this information whether it is kept in a computer system, medical record or other documents. Consistent with HIPAA and applicable state laws, we do not access, use, disclose or discuss patient-specific information with others unless it is necessary to serve the patient or complete our job duties, is required by law, or the patient/authorized representative has authorized the release. If you use or disclose PHI inappropriately, you will be subject to SCL Health's HIPAA Sanctions policy.

Patient information should never be posted or discussed on social media sites (except via Marketing and Communications, when written patient consent is obtained).

Consult PolicyTech from [The Landing](#) for SCL Health policies related to privacy and security of patient information. If you are unsure about accessing information, it is your responsibility to get guidance from your supervisor or the Care Site Compliance and Privacy Officer.



It is your responsibility to report suspected theft, loss or inappropriate uses or disclosures of PHI promptly to your supervisor and Care Site Compliance and Privacy Officer. Reports may also be made to the Compliance Hotline at **1-877-393-6752** or online at sclhealth.alertline.com.



BEST PRACTICES FOR PROTECTING PATIENT PRIVACY AND KEEPING PATIENT INFORMATION SAFE

- Do not leave patient information visible on computer screens. Lock your screen or log off your workstation when away.
- Do not leave charts or other confidential information open and visible on desks or counters.
- Shred printed documents containing patient data when you are done with them or place in designated locked shred bins.
- Use the minimum necessary information for payment and operations purposes.
- Avoid patient-related discussions in public areas and on social networking sites.
- Avoid informal or casual discussions of patient situations that are not directly related to care.
- Do not leave voice or phone messages containing sensitive information.
- Follow secure email and fax policies for transmitting PHI and only send to those with a need to know.
- Double check fax numbers to ensure a fax is directed to the correct recipient. If a fax is sent in error, immediately contact the recipient and request destruction or return of the fax.
- Do not take patient data off-site, except in accordance with SCL Health policies.
- Never leave patient data, whether stored on an electronic device or on paper, unattended. It must always be in the possession of an SCL Health caregiver/associate or agent, or in a secure location.



Patients who are Subjects in Clinical Research

We are committed to protecting the rights and welfare of all individuals who participate in research as human subjects.

We expect investigators conducting human-subject research to ensure an effective informed patient consent process. Obtaining patient consent involves informing the subject about his or her rights, the purpose of the study, the procedures to be undertaken, and the potential risks and benefits of participation. When we engage in clinical research, we require that all human-subject research complies with federal and state human-research protection laws and SCL Health policies.

Clinical Ethics Consultations, Advance Care Planning and Healthcare Decisions

We are committed to maintaining a comprehensive, integrated ethics program. To do so, we focus on the ethical delivery of patient care and emphasize human dignity, mutual respect and mutual trust. We work with patients and their loved ones to understand their wishes, advance directives or other advance care planning measures that guide or limit treatment decisions.

- We follow a Proactive Integrative Ethics model to ensure the ethical delivery of patient care services.
- We have ethics committees that patients, families and caregivers can access in order to work through difficult ethical concerns. More information, including how to ask for an ethics consult at each location, can be found on the Patient Services page on [The Landing](#).
- We comply with the Federal Patient Self-Determination Act and inform patients that they have the right to an advance directive.
- We ask for, accept and respect advance directives and resuscitative decisions.
- We help patients and their loved ones obtain advance care planning resources when requested.
- We honor patient wishes unless they are contrary to Catholic moral teaching, in which case we will assist in the transfer of the patient.

Workplace & Employment

Respect and Diversity

SCL Health is committed to creating a joyful and welcoming environment where associates are aligned and empowered. It is an important part of who we are. We recognize that we come from different backgrounds, cultures, ethnicities and beliefs. There is richness in diversity, and we embrace inclusiveness. When we respect each other and our patients, we live our value of Caring Spirit: honoring the sacred dignity of each person. Our shared values guide us in how we treat each other and those we serve. They inspire our daily tasks, infuse our work with greater purpose and help us accomplish our mission. We encourage spirituality in our work spaces through the use of prayer, reflection and ritual.

When we respect each other and our patients, we live our value of Caring Spirit: honoring the sacred dignity of each person.

Licensure, Certification and Excluded Individuals

In keeping with our value of Excellence, SCL Health is committed to ensuring that only individuals who are eligible to participate in federal healthcare programs and who are appropriately licensed or certified for their job role, work at our facilities. Associates are responsible for maintaining their credentials and for providing evidence of their credentials to SCL Health in a timely manner. Individuals who do not have valid, current licenses or certifications are not allowed to perform work that requires them.

Political Activities

We are committed to protecting our tax-exempt status by not allowing the use of SCL Health assets — including associate work time — for lobbying or other political activities. In certain situations, SCL Health may be involved in political activities in accordance with federal and state laws. It is important to distinguish between personal and work-related activities in order to comply with lobbying and other regulations.

- Associates should not use organizational resources, including email, to personally engage in political activity.
- Associates should not give the appearance or impression that their political activities represent SCL Health in any way.
- Associates should not contribute SCL Health financial resources to any political activity or seek reimbursement from SCL Health for any political donations.



Associate Health and Safety/Substance Abuse

We are committed to providing the resources, protocols and practices to create a safe and healthy work environment, free of alcohol, drugs

and weapons. SCL Health provides safeguards — including policies, training and equipment — to give associates the opportunity to take action and responsibility for their own health and safety.

All workplace injuries or illnesses must be reported. In addition, associates are required to report any individual who appears to be impaired in the performance of his/her job. SCL Health will take immediate action when we suspect an individual reports to work under the influence of drugs or alcohol. This may include drug and/or alcohol testing of individuals. SCL Health prohibits the use of any drug which is illegal under state or federal law. Associates should consult with their manager if they use prescribed or over-the-counter drugs which may interfere with their performance at work.



Harassment and Workplace Violence

We are committed to providing a work environment free of harassment and discrimination. We respect and protect the rights of associates to work in a safe, secure, trusting and caring environment. Harassment is not tolerated. This includes degrading or humiliating jokes, slurs or intimidation based on any characteristic protected by state or federal law.

Conduct that is abusive, demeaning, threatening, disrespectful or violent will not be tolerated.

SCL Health prohibits sexual harassment, including unwelcome sexual advances and rude or offensive comments.

Associates should promptly report any incident of discrimination, harassment, workplace violence or threatening behavior, bullying or any other abusive conduct to their supervisor. Other reporting channels include Human Resources, PEARL, Care Site Compliance and Privacy Officers, or the Compliance Hotline at **1-877-393-6752** or online at sclhealth.alertline.com.

Stewardship of SCL Health Resources

We embrace our value of Stewardship, which means we are committed to protecting the resources entrusted to us in support of patient care and other organizational goals. This means that SCL Health assets should only be used for legitimate business purposes. Technology and electronic communication systems should be used primarily for the benefit of SCL Health. Incidental and minor personal use of computers is permitted, but should not be used for personal financial benefit or gain, and may not interfere with your job or the ability of others to do their jobs. Associates should consult with their manager if there is a question about the use of SCL Health resources.

Conflicts of Interest

Upholding the value of Integrity means we do the right thing with openness and pride. We are committed to acting with integrity when potential conflicts of interest are identified, disclosed and managed or eliminated.

Conflicts of interest occur when personal interests or activities influence or appear to influence our actions and decisions. They also occur when you allow another activity or financial interest to influence your decisions made on behalf of SCL Health and its patients.

SCL Health requires certain individuals (directors, executives, board members, employed physicians and physician leaders) to complete a conflict of interest disclosure upon hire and on an annual basis; however, all associates and business partners are required to report any outside activity or private interest that may be perceived as a conflict of interest and must obtain approval according to SCL Health policy. More information can be found on PolicyTech through [The Landing](#).

Gifts and Entertainment

We are committed to avoiding even the appearance of inappropriate behavior.

We do not give or accept gifts or entertainment to or from a business partner if any purpose is to influence a business decision. Gifts and entertainment exchanged between us and our business partners may be considered a violation of federal and/or state law and therefore must comply with the limits set forth in SCL Health policies.

Gifts of cash or cash equivalents (including gift cards, lottery tickets, etc.) may never be accepted from a patient or business partner. Individual associates may not accept gifts from patients, their families or representatives unless the gift is perishable or consumable and is accepted on behalf of and shared with the department or group.

Gift limits do not apply to gifts given between associates of SCL Health; however associates should not feel compelled to give gifts or other contributions. Gifts should never be exchanged with the intent of influencing a decision.



Legal & Regulatory Compliance

Our business focus is to deliver on SCL Health's strategic priorities and key elements of transformation and growth to enable our health system to improve the health of our communities with special considerations for those who are poor and vulnerable. Our Mission, Vision and Values are at the heart of our business decisions as we adapt to the changes in healthcare and redesign our person-centered care delivery model.

We are humbled to be a trusted health partner in a complex industry and are committed to operating with integrity in a way that meets all legal and regulatory standards.

Our legal obligations include complying with federal and state laws specific to healthcare. These laws and regulations cover subjects such as false claims, illegal patient referrals, providing medically unnecessary services, violations of Medicare's Conditions of Participation and submitting inaccurate cost reports. SCL Health is committed to full compliance with these laws and regulations.

The following principles guide our compliance:

- Charges will be submitted only for services or supplies that are provided to the patient and are accurately and completely documented in the medical record.
- Charges will accurately represent the level of service provided to the patient.
- Only those services that are medically necessary and are supported by valid orders will be submitted for payment to Medicare, Medicaid and other payers.
- Under no circumstances will charges or codes be purposely selected to improperly increase the level of payment received.
- Overpayments will be reported and refunded as required by law.
- Cost reports will be accurate and filed in a timely manner.

SCL Health monitors billing, coding and cost reporting to detect errors and inaccuracies. If you have concerns about coding and billing, report your concern to your manager and your care site Compliance and Privacy Officer or to the SCL Health Compliance Hotline at **1-877-393-6752** or online at sclealth.alertline.com.



Patient Referrals

We are committed to creating arrangements with physicians and other referral sources that follow federal and state laws. It is important that associates who interact with physicians and other referral sources are aware of the related laws, regulations and policies including the Stark Law and the Anti-Kickback Statute.

Key Principles:

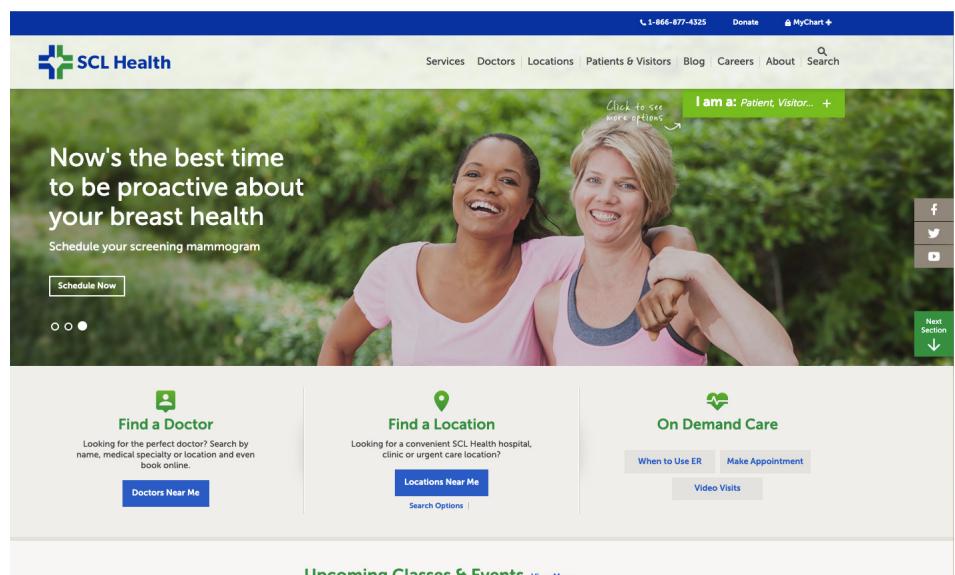
- **We do not pay for referrals.** We accept patient referrals and admissions solely on the patient's medical needs and our ability to render the needed services. We do not pay or offer to compensate, in any fashion, anyone for the referral of patients. For example, we would not offer discounted rent or free office space to a physician.
- **We do not accept payments for referrals we make.** No person acting on behalf of SCL Health may solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. When we make patient referrals to another healthcare provider, we do so based on the best interest of the patient and we do not take into account the volume or the value of referrals that the provider has made or may make to SCL Health.



Open and Fair Competition and Marketing Practices

We are committed to presenting truthful, informative and clear information in our marketing, advertising and educational materials. We require compliance with antitrust and other laws governing competitive activities.

- We do not provide free or discounted items or services to a Medicare or Medicaid beneficiary that are likely to influence their choice in seeking our services.
- We do not discuss with competitors certain sensitive business information, such as prices charged for goods and services, costs of goods and services, or managed care terms.
- We recognize the highly complex nature of the antitrust laws and consult with supervisors and legal counsel regarding competitive activities and appropriate communications.
- We present information about our services in a way that does not intentionally speak badly of other persons or businesses.
- We post our charges online in an effort to increase price transparency and empower consumers to make informed choices about their care.





Community Health Improvement and Community Benefit

We are committed to supporting our communities, especially the poor and vulnerable.

- We conduct a Community Health Needs Assessment every three years and develop an implementation plan on an annual basis to address the identified needs.
- We integrate our Community Health Improvement Plan with clinical operations, community engagement, financial services, communications, foundations and mission services to advance the success and awareness of the plan across the organization.
- We link our Community Health Improvement Plan to critical operational strategies such as population health management, evidence-based outcomes, palliative care and medical homes as well as our safety-net clinics.
- We effectively communicate financial assistance policies and community benefit performance, including posting them on our websites.
- We are committed to our mission and to serving uninsured and underinsured patients.
- We ensure our Board of Directors' involvement in meeting our charitable mission and protecting our tax-exempt status.





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