



Doing the Right Thing... Always

Dear Team Member:

At Regional One Health, our mission and shared values enable us to deliver quality health care services to our patients, to provide a caring environment at our facilities, and to maintain a positive and professional culture for our staff and colleagues. We are committed to delivering our services and ensuring our work is done in an ethical and legal manner.

This Code applies to all of us and we are each responsible for ensuring that our services and conduct comply with applicable federal and state laws, rules and regulations and the standards set forth in this document. Your commitment to this Code is the foundation for our mission and shared values.

If you have any questions regarding the Code or you encounter a situation that you believe violates its provisions, you should immediately consult your supervisor, another member of management, Human Resources, or our Corporate Compliance Officer at (901) 545-6554. You may also call the Compliance Hotline at (844) 860-0009.

We make every effort to maintain the confidentiality of your identity if you raise a question or concern, or report a possible violation of this Code. There is no retribution or consequence if you are reporting violations to this Code in good faith.

You are a valued member of Regional One Health and we ask you to support and adhere to the principles and shared values that enable us to carry out our mission of providing compassionate care and exceptional services.

Reginald W. Coopwood, MD
President
Chief Executive Officer

Code of Conduct

Introduction to the Code of Conduct

Regional One Health is committed to delivering high quality health care services to its patients and maintaining a positive and professional culture for its staff (which includes employees, staff physicians, residents/interns and contractors) and colleagues, while conducting business in a fair and principled manner. The standards of conduct outlined below will help ensure a positive environment and a culture that optimizes patient care and safety for staff, patients, and visitors.

A Commitment to Do the Right Thing

We will comply with this Code of Conduct (Code) and with all laws and regulations that apply. Any time we do not understand something, or have a concern, staff have the responsibility to obtain guidance. The first place to turn is a manager or director, a Vice President, the Corporate Compliance Officer, Human Resources or the Compliance Hot Line. When reported, violations of this Code will be addressed through appropriate administrative departmental and Human Resource policies related to the inappropriate behavior and conduct.

Non-Retaliation

When a person raises a good faith concern, calls the Compliance Hot Line, or cooperates with an investigation of possible ethics or compliance violations, retaliation **against that person is prohibited**. Regional One Health takes reports of retaliation very seriously. If retaliation occurs, it will result in discipline, up to and including termination of employment.

A Commitment to Our Patients

Care and Compassion

We treat all patients equally and with compassion, understanding and respect, regardless of race, ethnicity, religion, gender, sexual orientation, national origin, age, or disability. Regional One Health involves patients in decisions affecting their care and obtains their consent for treatment or participation in research.

Confidentiality

Patients and residents are respected by maintaining their confidentiality.

Patient Records

We will make every effort to ensure that entries made in patient records are clear, complete and reflect exactly the item or service that was provided.

Admission and Transfer

Regional One Health will not deny care to any patient based upon their inability to pay and will admit, transfer, and discharge based upon established criteria.

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A Commitment to Our Business Associates

Competition

Regional One Health competes fairly. Agreements will not be made with competitors that create monopolies or stifle competition.

A Commitment to Comply with Laws, Rules, and Regulations

We are committed to providing an environment in which compliance with rules, regulations (including federal healthcare program requirements), ethical business practices, and our Code of Conduct is woven into the corporate culture. We accept the responsibility to diligently self-governing and monitoring adherence to the requirements of the applicable laws and to our Code of Conduct.

Gifts and Entertainment

All gifts and entertainment, whether offered, provided or received, must be reasonable, occasional, and small enough so as not to appear improper. We do not offer, accept, or give bribes or kickbacks. Additional guidance may be found in the *Gift and Gratuities Policy*, located on the Intranet.

Compliance Hot Line

You are encouraged to call the Compliance Hotline (1-844-860-0009) with concerns related to ethics or compliance issues. Calls received through the Compliance Hotline are handled by the Corporate Compliance Department.

Requests for Information

Responding to Governmental Inquiries

All governmental agency requests, either written or verbal, must be reported to the Legal Department immediately. Regional One Health's legal team will advise you as to any further action.

Other Requests for Information

Requests from our fiscal intermediary, quality improvement organization, and/or other Centers for Medicare and Medicaid Services (CMS) contractors should be reviewed with the Legal Department prior to a response.

Financial Matters

Financial Records and Reports

Regional One Health takes great care to assure that all billings to the government, third-party payors, and patients are accurate and conform to all applicable federal and state laws and regulations. We prohibit staff or agent of the health system from knowingly presenting, or causing to be presented, claims for payment or approval that are false, fictitious, or fraudulent.

Potential improprieties regarding accounting, internal controls or auditing processes must be reported. If we have any questions, we should contact our supervisor, the Corporate Compliance Officer, the Legal Department, or the Compliance Hotline immediately.

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Proprietary Information

Staff will access and use proprietary information only in the performance of their duties. Some examples of proprietary information are strategic plans, trade secrets, information about potential acquisitions, divestitures and investments, and detailed earnings and financial results

Reporting of Violations

Regional One Health staff are required to report any suspected violations of federal and state laws, rules and regulations, health system policies or the Code of Conduct. Reports may be made to their supervisor, the Compliance Officer, or anonymously to the Compliance Hotline (1-844-860-0009), all without fear of retribution.

Resources to Support You in Doing the Right Thing

The Corporate Compliance Department

- Led by the Corporate Compliance Officer and supported by the Board of Directors and Senior Management.
- Administers Regional One Health's Compliance Program, which includes:
 - Developing Compliance policies, procedures and training;
 - Managing the Compliance Hot Line;
 - Reporting, auditing and monitoring compliance issues;
 - Verifying corrective action plans for areas of non-compliance.

Other Resources that provide guidance :

- Finance and Accounting: (901) 545-7676
- Internal Audit: (901) 545-8317
- HIPAA and Patient Confidentiality: (901) 545-6554
- Human Resources: (901) 545-7969
- Legal Department: (901) 545-6177
- Risk Management: (901) 545-6106
- Quality Department: (901) 545-7554
- Marketing and Communications: (901) 545-7117