

NuHealth System

SECTION: LEADERSHIP POLICY/PROCEDURE

TITLE: CODE OF ETHICS
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Cross References: Policies on: Compliance Plan; Bioethics Committee; Conflict of Interest; Outside Employment; HIPAA; Escalation through Chain of Command; Conflict Resolution; Procurement Guidelines; Employee Handbook

1.0 POLICY STATEMENT

At the NuHealth System (“NuHealth”), we have different roles and responsibilities- from caring for patients to medical education to administering corporate business operations. But one thing that holds true, regardless of the job description, is our commitment to honesty and integrity in all we do.

Ethical behavior is key to providing extraordinary care. We want to go above and beyond mere compliance with the law and consider how our behaviors and actions affect others- from patients, co-workers, business partners, vendors and on a larger scale, the communities whom we serve. As members of NuHealth, we commit to following core principles and specific guidelines that day-to-day govern our work and responsibilities.

2.0 CORE RESPONSIBILITES

- 2.1 We perform our jobs and assignments with honesty and integrity;
- 2.2 We are committed to a healing experience;
- 2.3 We know and abide by all laws, and we know and understand the details of the policies and procedures that apply to our jobs and assignments and to us as individuals;
- 2.4 We speak up with concerns about compliance and ethical issues. Specifically, we report observed and suspected violations of law or policies, and we agree to report any requests to do things we believe may be violations. Furthermore, we cooperate with any investigations of potential violations;
- 2.5 We recognize that our daily work gives us each the opportunity to see problems in our local areas before they become apparent to others or to management. Our leaders empower us and recognize when we raise questions about potentially noncompliant or unethical practices, we are fulfilling our responsibility;
- 2.6 We participate in yearly compliance training so that we know what situations to watch for and where to report our concerns;
- 2.7 If we have questions about a situation, we ask for help. We may talk to our supervisor or department head, the Chief Compliance Officer, Legal Counsel or call the 24-hour Compliance Hotline at (516) 572-5800.

3.0 SPECIFIC RESPONSIBILITIES

3.1 Responsibilities to Our Patients and Their Families

3.1.1 Protecting Privacy and Confidentiality

While working for NuHealth and even after we are no longer employed or associated with NuHealth, we are committed to maintaining the privacy of patients and nonpublic information maintained by NuHealth.

3.1.2 Protecting Patient Information

NuHealth routinely collects personal information about our patients in order to provide care. We understand how sensitive this information is and maintain its confidentiality accordingly. Consistent with the HIPAA Privacy Rule, we only disclose patient-specific information to serve the patient, obtain reimbursement, or as otherwise allowed by law. In certain situations, NuHealth may use health information for other limited purposes, such as for education, research, fundraising or analysis. When this is the case, we will only do so as the law or patient permits.

3.1.3 Providing a Respectful, Caring and Healing Environment for Patients and Families

This means: (i) we help patients understand and exercise their choices: we keep patients, and when authorized, their families and others informed of options in directing their own care, treatment, and services; (ii) we listen with sensitivity and consider the informed preferences of patients, including informed decisions to discontinue care, treatment and services; (iii) if a conflict arises during a patient's treatment, we offer clinical and ethical (Bioethics Committee) consultation to patients and families; (iv) we protect our patients' dignity, respect their cultural, psychological and spiritual values, and safeguard their personal information.

We welcome comments from patients and their families regarding our services. Comments- both negative and positive- are used as opportunities to enhance our services. Patient/family complaints (grievances) are promptly resolved. Lodging a complaint or grievance will not compromise a patient's access to care.

3.1.4 Using Care with Proprietary and Confidential Information

We will protect proprietary and confidential information by (i) following NuHealth's policies related to protecting nonpublic information; (ii) properly disposing of nonpublic information when it is no longer necessary to maintain it; (iii) taking appropriate safeguards when transmitting nonpublic information; and (iv) complying with agreements signed to protect the confidentiality of information. We are responsible for knowing what these agreements require and abiding by them.

3.1.5 Respecting the Proprietary Information of Others

Just as we protect our own confidential information, we respect the proprietary and confidential information of others. This includes written materials, software, music

and other intellectual property. We only use licensed and approved software and use it as outlined in the software owner's license agreements.

3.1.6 Ensuring Accuracy of Records and Reporting

NuHealth's credibility is judged in many ways- including the integrity of our records, recordings of financial transactions, and accounting practices. Records include business records such as quality, safety or personnel related records, as well as financial and medical records. We depend on accurate and reliable information to make responsible business decisions.

We create, approve, and archive records to maintain their integrity and truthfulness. The accuracy of records involves both factual documentation and ethical evaluation/appraisal. In addition, we retain records according to legal requirements and NuHealth's record retention schedules.

We comply with local and national laws relating to the accuracy and completeness of all records. We are honest, objective and accurate in our recordkeeping. If we make mistakes, we follow standard protocol to correct them and will not hide them.

3.1.7 Maintaining Computer and Network Security

NuHealth's computer systems are critical to helping to provide care to patients. To protect these systems, we comply with NuHealth's policies related to computer and network security.

3.1.8 Safeguarding and Protecting Confidentiality of NuHealth's Computer and Network Systems

This means we do things like appropriately using passwords, access codes, and screensavers. We log-off or lock computer screens when we are finished or will be away from the computer. We only use and access NuHealth's systems as necessary to perform our assigned functions.

3.2 Responsibility to Colleagues and our Workplace

3.2.1 Committed to Fair Practices

We understand that the depth of talent of NuHealth personnel comes from our diversity. By continuing to recruit the most qualified employees from a diverse pool of applicants, NuHealth is committed to equal opportunity employment. Talent and performance serve as the basis for advancement within NuHealth.

3.2.2 Never Discriminate

We make all business and employment decisions without considering a persons race, color, gender, religion, national origin, age, disability, military or veteran status. We treat all patients and personnel without regard to these individual differences. We recognize that individual caregivers' personal cultural values, ethics and religious beliefs may, on occasion, be in conflict with the care or treatment to be provided to individual patients. To recognize these conflicts, NuHealth provides a process whereby individual employees may remove themselves from the specific care

required, provided that alternative arrangements can be made and that negative outcomes for the care and treatment of the patient will not be incurred. In all instances, we will treat our patients, members, and each other with respect and support individuality.

3.2.3 Maintaining A Drug-Free Workplace

To protect the safety and well-being of our patients and colleagues, we commit ourselves to an alcohol- and drug-free work environment. When we report to work we do so free from the influence of alcohol and illegal drugs.

3.2.4 Keeping Our Workplace Safe

Each of us makes sure NuHealth is a safe place for both patients and personnel. We complete required safety training. We also comply with all laws, regulations, and standards, including those requiring NuHealth to maintain records about injuries, inspections, illness, and motor vehicle accidents. We follow NuHealth's policies regarding workplace safety.

3.2.5 Avoiding Conflicts Of Interest

We avoid situations where our personal interests may conflict with those of NuHealth. A conflict of interest arises if we have a personal, financial or other relationship or interest that could interfere or compete with the interests of NuHealth, or if we are in a situation to use our position within NuHealth for personal gain. We inform our supervisors when confronted with any situation that could be perceived as a conflict of interest, even if we do not think the situation would violate our guidelines. Examples of potential conflicts of interest include (i) outside employment; and (ii) personal use of NuHealth's resources.

3.2.6 Protecting Our Benefits

We responsibly use NuHealth benefits plans for ourselves and other covered individuals, and provide accurate information when doing so. We ensure that ineligible individuals are not covered under our plans.

3.2.7 Responsibility For Company Time

We use our time at NuHealth to further NuHealth's mission and strategic goals. We accurately report and record our time.

3.2.8 Appropriately Use Communication Channels

We work with our Public Relations department to ensure accuracy as we prepare public presentations or media interviews, and we forward all media requests to NuHealth's Director of Public Relations.

3.3 Responsibility to Our Business Partners and Vendors

3.3.1 Treating Others Fairly

We deal fairly with each other, our patients and members, business partners, vendors and competitors. Pursuant to our Procurement Guidelines, we select supplies, vendors, contractors and consultants based upon fair, competitive practices and objective factors including quality, price, service and delivery.

3.3.2 Interacting With Vendors Honestly

We value our vendors as they play a role in the success of NuHealth. Vendors include suppliers, external consultants, on-site consultants, and other representatives who are hired to perform services for NuHealth. Our selection of vendors will be made on their ability to meet our needs rather than on personal relationships and friendships or on any inducements or personal offers. We interact with them with honesty and integrity, which includes never taking kickbacks or bribes from them. When working with vendors, we do so free from conflicts of interest and are compliant with applicable laws and fair business practices.

3.4 Responsibility to Our Community

3.4.1 Acting As A Responsible Public Benefit Corporation

As a public benefit corporation, we engage in activities to further our mission, values and services as provided by our enabling legislation, including responsible financial activities. This means: (i) avoiding compensation arrangements in excess of fair market value; (ii) never taking action that inappropriately creates revenues for NuHealth such as inaccurate coding or billing of medical services, inappropriate submissions of claims for reimbursement or reports concerning the costs of the hospital; (iii) acting consistent with the Public Authorities Accountability Act and other regulations affecting similarly situated public authorities.

3.4.2 Following All Laws And Regulations, Especially Those Related To Healthcare

We know, understand, and abide by all laws that apply to our jobs or assignments. We honestly report observed and suspected violations of laws or policies to the appropriate authorities.

3.4.3 Following Environmental Regulations

We abide by all laws, regulations, and NuHealth policies relating to the protection of the environment.

3.4.4 Cooperating With Government Inquiries And Investigations

NuHealth is regulated by local, state and federal agencies. From time to time, we may encounter government officials responsible for regulating various aspects of healthcare or other business practices.

If we receive a request for information from a government investigative agency, we take the following steps: (i) check with management and/legal counsel in order to make sure we take all appropriate steps to protect NuHealth's legitimate legal interests; (ii) contact our senior administrators and the Compliance Office, or Office of Legal Affairs, as indicated, if a governmental investigation or inquiry is under

way; and (iii) protect the integrity of NuHealth documents related to a known or possible government investigation.

3.4.5 Report Suspicious Activity

Each of us is responsible to report concerns and suspected misconduct that could violate NuHealth's Code of Ethics, state or federal laws, or NuHealth policy. You can report or raise these concerns by doing any of the following: (i) report any suspected violations to your supervisor, department head, Human Resources representatives or Office of Legal Affairs; (ii) contact the Compliance Office; (iii) call the Compliance Hotline at (516) 572-5800.

Remember, the key is to speak up and bring concerns out in the open so that they can be resolved quickly before serious harm occurs. There will not be retaliation against anyone who reports legitimate concerns. Please also pay attention to any suspicious activity occurring in your work area that may be a risk to patients, employees, volunteers, other personnel, or data. Examples of activity to watch for include (i) individuals in work areas without identification badges; (ii) individuals requesting patient information without proper authorization; (iii) unattended boxes or packages. Report these and other suspicious activities to NuHealth's Security Department.