



**Anderson**

**HEALTHCARE**

*Code of*  
**EXCELLENCE**  
*& Code of*  
**CONDUCT**



*Anderson Healthcare  
Code of Excellence  
And  
Code of Conduct  
Purpose*

Anderson Healthcare is committed to providing quality healthcare services in the communities we serve. In order to provide these quality healthcare services, Anderson Healthcare must have high standards of professional, ethical, legal and conscientious business practices. To promote ethical and lawful conduct throughout our organization, Anderson Healthcare implemented a system-wide Compliance Program. As the foundation of the Compliance Program, to ensure our commitment to maintaining excellence, respect and integrity in all aspects of our professional and business conduct and our operations, we have prepared this Code of Excellence and Code of Conduct.

The Code of Excellence and the Code of Conduct (referred to as Standards) apply to all employees, Medical Staff, Allied Health Staff, Board of Trustees, volunteers, students, contractors, consultants, suppliers and vendors (coworkers) of Anderson Healthcare. The Codes identify the standards that everyone within our organization must understand and follow and is intended to be a resource for resolving questions about appropriate conduct in the work place. In addition to outlining expectations for daily interactions and conduct, the Codes also assist each of us in our obligation to comply with federal and state laws, as well as Anderson policies. While these Codes are great resources, they cannot replace each person's sense of fairness, judgment, honesty and integrity. Thus, if you encounter a situation that is not addressed in the Code of Excellence or Code of Conduct, but which just does not feel right, it is important to discuss the situation with your supervisor or our Compliance Officer.

Some of the standards addressed in this Code of Excellence or the Code of Conduct may not apply to the services you perform at Anderson; however, everyone needs to be aware of all expectations contained in these Codes so that we understand the responsibilities of all who work at Anderson Healthcare. The importance of each individual's involvement and participation in the Compliance Program cannot be overemphasized. Each person within our organization is essential to the success of our Compliance Program and needs to be fully committed to compliance with these Codes.

Thank you for your contributions and commitment to our organization's compliance efforts.

A handwritten signature in black ink that reads "Mike M. Marshall". The signature is written in a cursive, flowing style.

Mike M. Marshall, CEO

### Mission

To exceed expectations by providing personal, convenient, quality healthcare.

### Vision

Our community turns to Anderson Healthcare first for all healthcare needs.

### Values: Pillars of Excellence

**Service:** Provide excellence in patient centered and compassionate services, making Anderson Healthcare the provider of choice for the community.

**People:** Attract, develop, support and retain skilled, service-oriented and culturally diverse team members committed to Anderson Healthcare's Mission.


**Quality:** Demonstrate excellence in clinical outcomes and patient safety by providing quality care through continuous improvement.

**Growth:** Expand services and develop affiliations and partnerships, as a community hospital, to meet the healthcare needs of Anderson Healthcare's service area.

**Finance:** Strengthen the financial performance of Anderson Healthcare, through exceptional stewardship to support investment in people, technology, facilities and services.

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*Code of*  
**EXCELLENCE**

## Honesty and Integrity

Honesty and Integrity are the most important qualities for our interactions and relationships with our patients and coworkers.

To demonstrate my commitment to this principle:

### I WILL...

- Be truthful in all my actions and will not knowingly mislead others or act dishonestly.
- Maintain accurate, timely and complete records of patient care and business activities.
- Make patient care decisions focusing on patients' needs and best interests of the patient.
- Commit to the highest standards of business ethics and integrity.
- Avoid any activity or scheme that would take advantage of anyone for their money, property or services.
- Not destroy or alter the organization's documents.
- Obtain the approval of my director, in advance, if I am requesting to use Anderson Healthcare equipment, supplies, materials or services for personal or non-work related purposes.
- Obtain approval from my direct supervisor in advance of any plan to use company time for an activity that brings payment to me.

## Attitude

We will never get a second chance to make a first impression. Therefore every interaction is an important one.

To demonstrate my commitment to this principle:

### I WILL...

- Demonstrate a respectful and caring attitude by treating others as I wish to be treated.
- Convey a positive attitude and refrain from rudeness and negativity by using such statements as:  
*"It's not my job" instead say: "I'll find someone who can help you"*  
*"I didn't do it" instead say: "I'll make this right"*  
*"We are short staffed" instead say: "I'll do whatever it takes"*
- Acknowledge people immediately even if I need to stop what I am doing.
- Greet people with a smile or hello, make eye contact and introduce myself.
- Use the person's name whenever possible.
- Anticipate people's needs and not wait to be asked.
- Keep my personal or professional stressors away from my patients and coworkers.
- Bring work-related concerns to my supervisor for discussion.
- Be mindful of my body language because it speaks louder than words.
- Be positive in all my discussions about Anderson Healthcare.

To demonstrate my commitment to this principle:

I WILL...

- » Fulfill the responsibilities of my job.
- » Avoid blaming and instead focus on addressing issues.
- » Be accountable for maintaining required licenses, certifications and mandatory professional education.

**Accountability** Accountability means taking pride in what I do and the responsibility for the outcomes of my efforts. I believe that my work is a reflection of myself.

To demonstrate my commitment to this principle:

I WILL...

- » Be loyal to Anderson Healthcare.
- » Support my organization and the work of fellow coworkers.
- » Commit to encouraging, valuing and supporting diversity.
- » Follow through on my commitments.
- » Be willing to accept additional responsibility.
- » Function with the understanding that cooperation is expected in the workplace.

## Commitment

Teamwork – one for all – all for one. My coworker is every fellow employee, volunteer or student, medical staff, allied health staff, vendor and contractor of Anderson Healthcare.

To demonstrate my commitment to this principle:

I WILL...

- » Follow the AIDET principles:
  - Acknowledgement*
  - Introduction*
  - Duration*
  - Explanation*
  - Thanks*
- » Encourage patients and significant others to ask questions and respond to their concerns in a timely manner.
- » Get someone who can help if a patient or coworker makes a request that I am unable to fulfill.
- » Avoid creating rumors or engaging in hostile, condemning or demeaning communications.
- » Take responsibility to obtain and read hospital communications as directed by my manager.
- » Use easy-to-understand and appropriate language when giving patient information.
- » Avoid providing false or misleading statements to any patient or any other person.
- » Remember that face to face communication can be better than email.
- » Leave the appropriate e-mail or voicemail when I plan to be away for an extended period of time (e.g. vacation).

## Communication

The goal of communication is mutual understanding.

## Service

It is important that we support Anderson Healthcare's values, mission and vision. Our primary goal is to exceed our patients' and coworkers' expectations. I recognize our patients have a choice where they receive their healthcare.

To demonstrate my commitment to this principle:  
I WILL...

- Understand that patients' family and significant others are as important as the patient.
- Keep patients, significant others and coworkers informed.
- Escort or obtain the assistance of a coworker or volunteer for visitors who need directions.

**Professionalism** A commitment to a professional and caring environment is very important.

To demonstrate my commitment to this principle:  
I WILL...

- Treat coworkers as teammates who deserve my respect.
- Be courteous in both verbal and nonverbal communications.
- Treat every coworker as a professional and recognize our different areas of expertise.
- Respect the privacy of my fellow coworkers.
- Avoid chastising or embarrassing coworkers.
- Relate to all patients and coworkers equally, regardless of age, gender, gender orientation, disability, race, ethnicity, creed, religion or national origin.
- Consider another's priority in addition to my own.
- Extend professional courtesy to everyone, set aside differences when working with others, address issues with the involved party and enlist the assistance of a supervisor if necessary.
- Welcome new coworkers and be supportive by offering help and setting an example of the level of cooperation expected in our workplace.



To demonstrate my commitment to this principle:

I WILL...

- » Utilize Personal Protective Equipment (PPE) as appropriate.
- » Be aware of Safety Data Sheets (SDS) as it relates to my department.
- » Not falsify, tamper with, render inaccurate, or fail to install, a required monitoring device.
- » Follow the basics of good body mechanics to protect myself, my coworker and my patients.
- » Use the safe patient handling equipment.
- » Return equipment and supplies to the appropriate place.
- » Utilize security services when the need arises.
- » Intervene if I recognize an unsafe situation.
- » Use equipment, supplies, material and services only as authorized.
- » Notify my supervisor of any workplace injury or any situation creating a danger of workplace injury so that immediate corrective measures can be taken.
- » Question individuals without an ID badge, as appropriate

## Safety

Safety is everyone's job. We manage and operate our business in a manner that respects our environment and conserves natural resources. We strive to use our resources appropriately and efficiently and dispose of all waste in accordance with applicable laws. It is essential to report all known or suspected safety concerns and immediately notify the supervisor of any situation involving improper disposal of hazardous waste or any other situation that may be damaging to the environment.

**I UNDERSTAND...**

- ⁿ Unless service of alcoholic beverages at official Anderson Healthcare functions is authorized, it is prohibited to use alcohol at Anderson Healthcare functions.
- ⁿ The use of controlled substances or alcoholic beverages by employees or coworkers; or employees or coworkers working under the influence of these chemicals, is inconsistent with the behavior expected of employees and coworkers.
- ⁿ This type of behavior subjects employees, coworkers and visitors to unacceptable safety risks, and undermines Anderson Healthcare's ability to operate effectively and efficiently.
- ⁿ All employees and coworkers must remain free from impairment due to the use of drugs and alcohol while on the job and from use, possession, manufacture, or sale of any drug or alcohol on Anderson Healthcare property.
- ⁿ The unauthorized use of alcoholic beverages in the workplace or the unlawful use, possession, concealment, transportation, promotion, sale or distribution of controlled substances on the job, on Anderson Healthcare Property or while engaged in Anderson Healthcare business off the property is strictly prohibited and will subject the employee to disciplinary action.

**Drug Free Workplace**

Anderson Healthcare is a drug-free workplace. Anderson Healthcare is committed to maintaining a safe, healthful and efficient environment for the organization, its employees, coworkers and visitors. Employees are to remain free of impairment related to substance abuse. The illegal possession or sale of any drug or alcohol on the organizations' property or any of its related services is prohibited. In addition, the Drug-Free Workplace Act of 1988 requires an organization's services who receive federal grants to certify it will provide a drug-free workplace.

## **Confidentiality and Privacy**

Anderson Healthcare coworkers have access to a broad variety of confidential, sensitive and proprietary information. If this information is released inappropriately, it could cause harm to patients, Anderson Healthcare's business partners and Anderson Healthcare itself and may violate federal and state law. Everyone is obligated to actively safeguard confidential, sensitive and proprietary information to prevent the unauthorized disclosure of such information.

**To demonstrate my commitment to this principle:**

**I WILL...**

- Discuss company business only in private areas.
- Maintain patients' privacy and confidentiality and will not discuss patient information in any public place such as an elevator, open hallway or cafeteria.
- Access patient information only as it pertains to my work and job duties.
- Share patient information only with those who have a need to know for patient care reasons and as otherwise permitted by the organization's HIPAA privacy policies.
- Keep unauthorized persons out of patient care areas.
- Apply all privacy and security safeguards to protected health information as required by the organization's HIPAA privacy and security compliance policies.
- Respect patients' privacy and modesty by knocking before entering a room.
- Explain to the patient closing the curtain for privacy.
- Ask visitors and family to leave the room during patient care interactions unless the patient indicates otherwise.
- Avoid using any social media in any form to discuss patients or any other confidential information.
- Understand personal and medical staff information is confidential and is not shared beyond those individuals with a need to know to fulfill their job functions and consistent with applicable law and our policies.

**If questions arise regarding an obligation to maintain the confidentiality of information, or whether releasing specific information is appropriate, Anderson Healthcare coworkers should seek guidance from their department head, manager, supervisor, administrative director or Privacy Officer.**

To demonstrate my commitment to this principle:

I WILL...

- Obtain proper authorization before using our organization's computing resources from the Information Technology department.
- Use the organization's computing resources for purposes only for which I am authorized.
- Keep my access privileges confidential (Username and passwords).
- Electronically transmit or distribute material only consistent with the organization's policies and guidelines.
- Respect the privacy of other users. More specifically, avoid reading, deleting, copying, or modifying another user's data, information, files, e-mail or programs ("electronic files") without the other user's expressed permission.
- Refrain from introducing any program or data intended to disrupt normal operations (e.g., a computer "virus" or "worm") into Anderson Healthcare's computer systems.
- Refrain from circumventing or attempting to circumvent normal log-on procedures, or security procedures.
- Refrain from using our computer resources for recreational game playing, or streaming video or audio.
- Refrain from opening e-mails from unknown/suspicious sources.
- Use email for business purposes only.

## Use of Computer and Communication Systems

Patient, personal, and financial information is housed in our electronic record applications. Accessing only what is appropriate and preventing all other access is vital to the protection of Anderson, coworkers and our patients. All communications, electronic mail, intranet, internet access, voice mail or paper records are the property of Anderson Healthcare and should be used for business purposes only.

## Telephone Etiquette

Answering telephones correctly and politely is everyone's responsibility.

To demonstrate my commitment to this principle:

**I WILL...**

- Make a good impression by answering on the first ring whenever possible and remember that the tone sets the stage.
- Avoid eating, drinking or chewing gum while speaking on the telephone.
- Answer all calls with a greeting identifying your department and yourself. For example: "Good morning, third medical, this is Susie".
- Use the speakerphone only when necessary. If a speakerphone must be used, ask for permission and inform the caller of who else is present in the listening area.
- Avoid transferring a call blindly. Notify the receiving party of the call, and provide the caller with the telephone number in case the call is lost. If the call is answered in voicemail, let the caller know and ask if they would like to leave a message or call back at a later time.
- Obtain the caller's permission before placing him/her on hold and thank the caller for holding when returning to the call.
- Leave the appropriate voice message, if planning to be away for an extended period (e.g., vacation).
- Return calls promptly.

## Elevator Etiquette

Good elevator manners contribute to customer satisfaction and smooth transportation.

To demonstrate my commitment to this principle:

**I WILL...**

- Use the elevator as an opportunity to make a favorable impression by smiling and politely speaking to fellow passengers.
- Pause briefly before attempting to board an elevator so as to not block the way for anyone wishing to exit.
- Allow enough space in the elevator for people with disabilities and other passengers.
- Give patients and visitors priority use of the elevator.
- Keep in mind that many staff, patients and visitors ride the elevator; avoid discussing any patient information or any other inappropriate topics.

**To demonstrate my commitment to this principle:**

**I WILL...**

- Answer call lights in a way that demonstrates the care, courtesy and respect our patients deserve.
- See the call light
- Take time to drop in and introduce myself (AIDET)
- Find out what the patient needs.
- Pass the need on if I can't fulfill the request.

**Call Lights**

The No Pass Zones empower any employee who sees a call light to respond, even if it is not the employee's department. The No Pass Zone ensures the patient that the entire team is working together to meet their needs.

**To demonstrate my commitment to this principle:**

**I WILL...**

- Adhere to the dress code.
- Wear my ID badge, placing it above the waist, facing out, and not attach ornamentation directly to the badge.

**Dress Code**

The professional appearance of Anderson Healthcare staff is important. Our patients', coworkers' and customers' opinion and perception of the quality of patient care is related to whether or not someone presents a professional appearance. When all employees present a consistently professional appearance, it translates directly to increased customer satisfaction.


**To demonstrate my commitment to this principle:**

**I WILL...**

- Show respect to others by either silencing electronic devices, placing them on vibrate mode, removing myself from the meeting to transact calls, or quietly identifying that I am in a meeting.
- Always make every effort to be on time and be respectful of other's time during meetings.
- Avoid sideline discussions during meetings.

**Meetings**

Meetings are needed in order to receive and provide information, share ideas and resolve issues. For meetings to be effective, it is important to give our undivided attention to all participants.



*Code of*  
**CONDUCT**

## I understand this means...

- There is no harassment or discrimination in the workplace and we expect the same from all our coworkers and patients, and any visitor to Anderson Healthcare.
- Anderson Healthcare will not tolerate any harassing, intimidating or disruptive conduct that interferes with work performance or creates an intimidating, hostile or offensive work environment.
- Any allegation of harassment or discrimination will be promptly investigated in accordance with applicable human resources policies.
- Compensation and promotion of employees are done according to our policies and procedures.
- Equitable benefits are provided to all eligible employees.
- That reasonable accommodation is made to the known physical and mental limitations of otherwise qualified individuals with disabilities.

## Employment Practices

Anderson is committed to fair and equal employment opportunities and to treating everyone with respect and courtesy. Anderson Healthcare recruits, hires, trains and promotes individuals without regard to race, color, creed, religion, age, disability, gender, national origin, citizenship, or veteran status. All personnel actions including those relating to compensation, benefits, transfers, layoffs, organization-sponsored training and tuition assistance programs are administered without regard to race, color, creed, religion, age, disability, gender, national origin, citizenship or veteran status.

## To demonstrate my commitment to this principle:

### I WILL...

- Avoid making or receiving direct, indirect or disguised payments in exchange for the referral of patients.
- Avoid submitting false, fraudulent or misleading claims to any government entity or third party payor.
- Avoid making a false description in order to gain or retain participation in a program or to obtain a payment for any service.
- Avoid falsely certifying that a service was medically necessary.
- Avoid making any false or misleading statements about the products or services of Anderson Healthcare or about Anderson Healthcare's competitors.

## Fraud and Abuse

**FRAUD** is the intentional deception or lack of truthfulness by a person with knowledge that this lack of truthfulness could result in some illegal benefit to him or herself or some other person. **ABUSE** is inconsistent or unsound business, financial or medical practices that result in unnecessary cost, being paid for services that are not medically necessary or don't meet professionally recognized standards for health care. A consistent adherence to honesty and integrity guides all that we do.



## Billing for Services

Federal law prohibits healthcare providers from knowingly submitting false or fraudulent claims for payment to Federal healthcare programs. State laws contain similar prohibitions. Examples of false claims include claims for services not rendered, claims that characterize the service differently from the service actually provided or claims that do not comply with applicable laws. Anderson Healthcare implemented policies and procedures to facilitate accurate coding and billing for services provided to our patients. All claims submitted to any payor must be accurate and cost reports must be prepared consistent with applicable laws. Coding is our method to identify and classify diseases and procedures and is based on the care provided and the documentation in the medical record. Coding and billing must be timely, accurate and complete. Knowingly presenting or causing to be presented claims to any payor which are false or fraudulent is prohibited.

### I understand that...

- We charge patients for clinical services provided consistent with applicable laws and policies.
- We assign codes that we believe in good faith accurately reflect the services provided and are supported by documentation in the medical record.
- We do not bill for any items and services not rendered or not medically necessary and do not falsify a diagnosis or a type or level of service to obtain payment.
- We do not submit a claim piecemeal or in a fragmented fashion to maximize reimbursement for tests and procedures that are required to be billed together (i.e., unbundling).
- We have controls in place to prevent unbundling, upcoding and duplicate billing for the same services.
- We respond to billing inquiries in a timely manner, and we resolve inaccuracies for claims previously submitted.
- We make every effort to work with our employees who perform our billing and coding process so that they have the appropriate skills to perform these functions accurately.
- Any subcontractors engaged to perform services for Anderson Healthcare are expected to comply with applicable laws and follow the same high standards of coding and billing.
- We do not knowingly submit claims for payment that are false or inaccurate.
- If we identify a refund due to a payor, we make refunds as required by law.

**I understand that...**

- No payments can be made to a physician/physician group without a current and signed agreement in place.
- Agreements with physicians must be put in writing and approved in advance by Administration.
- Compensation to physicians for services must be consistent with fair market value and not take into account the volume or value of referrals to Anderson Healthcare.
- There is no “private understanding” to referrals of business.

**Relationships with****Our Physicians** Relationships

Relationships with physicians are subject to the Federal Stark Law which prohibits a physician from referring a patient to an entity for designated health services, which include, among others, hospital services, payable by Medicare if the physician has a “financial relationship” with the entity. “Financial relationship” includes a compensation arrangement or an investment interest. The Stark Law disallows Medicare payments for services provided pursuant to prohibited referrals. All arrangements with physicians must be structured to assure compliance with the Stark Law and other applicable laws. Any proposed arrangement with physicians which may implicate the Stark Law shall be evaluated and approved by the Compliance Officer, in consultation with the legal counsel.

## Kickbacks

The Federal Antikickback Law applies to relationships with physicians and other referral sources and prohibits direct or indirect remuneration in exchange for the referrals of patients. Anderson Healthcare accepts patients based on their health care needs and our ability to provide the needed services. No payments or other remuneration shall be given to anyone in exchange for patient referrals.

### I understand that...

- ⁂ We accept patient referrals/admissions solely based on the patient's clinical needs and our ability to render the needed services.
- ⁂ We will not pay or offer to pay anyone - employees, physicians or other persons - for referrals of patients.
- ⁂ No employee or other person acting on behalf of Anderson Healthcare is permitted to enter into any agreements with referral sources that are linked directly, or indirectly, to the referral of patients.
- ⁂ No employee or any other person acting on behalf of Anderson Healthcare is permitted to solicit or receive anything of value, directly, or indirectly, in exchange for the referral of patients.
- ⁂ Our physicians and other health care providers make patient referrals solely based on the patient's clinical needs and the abilities of the referred provider to render such services.
- ⁂ We do not waive insurance co-payments or otherwise provide financial benefits to patients in return for admission.
- ⁂ Under certain circumstances, Anderson Healthcare may provide for appropriate financial arrangements (such as allowing monthly payments over time) to patients based purely on their financial need.
- ⁂ We inform patients of their options as to home health, hospice, durable medical equipment, home infusion, and other ancillary health care services and to allow patients to choose when selecting any services that the patient may require.

**I understand this means...**

- ⁂ It is permissible to keep individual gifts that have a value not greater than \$15 per item, as long as the total value of \$75.00 is not exceeded for gifts in any one year from any one individual or organization. I will talk to my direct supervisor if I do not know the value of a gift.
- ⁂ Seeking clarification from a supervisor is necessary if there is a question whether a gift is acceptable.
- ⁂ To the extent possible, gifts received should be shared with my coworkers.
- ⁂ Any gift of cash or cash equivalents (e.g. Visa Gift Card) is never permissible to accept from a patient, a family member, a business partner or any company with whom we do business.
- ⁂ Gifts may be accepted if they are consumable or perishable, and cannot have a value of more than \$15 per person.
- ⁂ No money, services or other things of value may be offered to influence the judgment or decision-making process of any purchaser, supplier, customer, government official or other person involved in any type of business with Anderson Healthcare.
- ⁂ My Department Director or the Compliance Officer needs to be notified if I have been offered excessive entertainment, gifts or other favors by a company doing or seeking to do business with Anderson Healthcare, or by a competitor of Anderson Healthcare.
- ⁂ Business transactions with vendors, contractors and other third parties may not involve improper incentives in exchange for influence or assistance in a transaction. (For example: offers of gifts or favors, requests for gifts or favors, bribes, tips, etc.)
- ⁂ It is not permissible to give gifts of greater than \$15 in value or to use gifts as inducements to patients.

**Gifts, Gratuities and Entertainment**

The giving of gifts can have the goal to influence, or be considered by an independent person to be seen as having the potential to influence, us in our conduct of our duties or responsibilities at Anderson Healthcare.

## **Conflict of Interest**

A conflict of interest can exist when financial or other personal considerations directly or indirectly affect or appear to affect personal judgement when carrying out duties or providing safe, quality care and treatment to our patients. Products and services must be bought and sold based solely on their value and merit.

To demonstrate my commitment to this principle:

**I WILL...**

- Identify any other jobs I have outside Anderson Healthcare to my director/administrative director, if the other position affects the performance of my duties for Anderson Healthcare.
- Inform my director/administrative director before accepting outside employment while employed by Anderson Healthcare.
- Obtain the approval of my director/administrative director before engaging in consulting or other outside activities.
- Identify financial investments that appear to impact or could impact the objective and efficient performance of my work at Anderson Healthcare to my director/administrative director.
- Identify if I or members of my family receive personal benefits as a result of my position at Anderson Healthcare to my director/administrative director.
- Disclose personal relationships and business activities with contractors (those we do business with) that might be seen as influencing the performance of my duties.
- Maintain a current Conflict of Interest document and provide any updates to the Compliance Officer.
- Not provide consulting or other similar services to any company doing or seeking to do business with Anderson Healthcare if providing this service would impair my ability to perform my duties at Anderson Healthcare.
- Not use "insider" information (a fact not known to the public) for any business activity conducted by or on behalf of Anderson Healthcare.

**To demonstrate my commitment to this principle:**

**I WILL...**

- Not obtain or share confidential business information from competitors (this includes customer lists, price lists, contracts or other information).
- Avoid communicating confidential information.
- Maintain Anderson Healthcare's intellectual property rights, including any patents, trademarks, copyrights and software; these are carefully maintained and managed to preserve and protect their value.
- Avoid acquiring confidential or privately owned information belonging to another person or business in a wrongful way.
- Avoid using any publication, document, computer program, information or product in violation of a third party's interest in that product.
- Avoid making copies of documents or computer programs in violation of applicable copyright laws or licensing agreements, either for my own use or the use of Anderson Healthcare.

## Intellectual Property

Federal and State laws protect intellectual property which includes copyrights, trademarks, patents and trade secrets. Copyright laws provide protection when an original work of authorship such as a book or an article, a computer software program or a recorded program is fixed in a tangible medium of expression. Trademark laws protect consumers from confusion about the source and quality of goods or services. Patent laws give an inventor exclusive rights to make, use and sell the patented invention. Trademarked, registered, patented or privately-owned information is exclusive to the company who owns that information.

**I understand...**

- We provide a medical screening examination and stabilizing treatment to all who come to us for emergency treatment to determine whether an emergency medical condition exists.
- We provide a medical screening examination and stabilizing treatment to all who are in labor.
- We provide this treatment regardless of the person's ability to pay or if they lack insurance.
- We transfer patients with emergency conditions to other facilities only at the patient's request or if we do not have the capacity or capability to meet their needs and the appropriate care level is available at another facility.

## Emergency Treatment

As an organization we follow the federal EMTALA regulations regarding the care and treatment of patients seen in our Emergency Room and Urgent Care centers. Transfers to other facilities are only done when in compliance with state and federal regulations.

## **Patient Care Standards**

Anderson Healthcare is committed to providing high quality, safe, compassionate and cost effective health care services. Patient care related standards may be contained in various policies of Anderson Healthcare and are dictated by numerous legal standards, such as Medicare hospital conditions of participation, hospital licensing requirements, The Joint Commission Standards and many others. Every employee and coworker shall understand and follow the laws, professional standards and Anderson policies and procedures related to patient care and shall strive to provide exceptional patient care at all times.

Employees, and at times coworkers, have the most direct link to our patients and our operations and are in the best position to identify potential problems. Therefore, Anderson Healthcare relies on its employees and coworkers to provide feedback to make improvements to patient care services. In any circumstance where an employee or coworker has a concern about patient safety or quality of patient care, the employee or coworker is obligated to promptly raise the issue with their supervisor, or Compliance Officer, so that the issue can be properly evaluated and addressed.

### **To demonstrate my commitment to this principle: I WILL...**

- Treat all patients with dignity and respect.
- Provide care that is safe and appropriate.
- Provide assurance and preserve patient dignity during procedures.
- Not engage in conduct that endangers a patient.
- Bring any patient care or safety concerns to the attention of my supervisor.
- Timely report any malfunction of medical equipment or any injury to a patient caused by any medical device.

To demonstrate my commitment to this principle:

I WILL...

- Be familiar with and understand patient rights.
- Ensure that care provided to our patients is consistent with and supports patient rights.
- Be sensitive and respectful of each patient's cultural preferences and needs.

## Patient Rights

Health care services provided by Anderson Healthcare are available to all patients and Anderson Healthcare does not discriminate, exclude or treat people differently because of age, gender, gender orientation, gender identity and/or expression, disability, race, color, creed, religion, national origin, citizenship, veteran status, military status, unfavorable discharge from military, disability, genetic information and testing or other lawfully protected status. We do not discriminate against any person or group as we care for and treat our patients. We offer free aids and services to individuals with disabilities to communicate effectively with us and provide free language services to individuals whose primary language is not English. We respect cultural heritage of every person. Each of our patients is given a statement of patient rights which explain that each patient has, among other rights, the right to make informed decisions about health care services, the right to refuse treatment and the right to confidentiality of medical information.

I understand...

- Financial assistance is provided in a manner that addresses the patient's individual situation and complies with applicable eligibility criteria as defined in our financial assistance policies.

## Charity Care and Discounts

Financial assistance is available to our patients in the form of financial needs discounts and charity care.



## Excluded and Sanctioned Individuals

We cannot accept orders from unlicensed, excluded or suspended (from taking care of Medicare or Medicaid Patient) physicians or allied health practitioner. State licensure must be checked for any physician or allied health practitioner new to Anderson Healthcare. Any new provider, employee or vendor is also verified against state and the OIG Exclusions List to assure we may work with that individual before the relationship begins.

### I will...

- Avoid completing orders from a not-on-staff practitioner until their licensure, OIG exclusions database and Medicaid participation status is verified, if this pertains to my job duties.
- Avoid employing or contracting with any individual until the OIG, Medicaid and GSA exclusion databases are checked, if this pertains to my job duties.
- Avoid contracting/working with a vendor until the Office of Inspector General LEIE, GSA SAM excluded vendor databases are checked, if this pertains to my job duties.

## Antitrust

Antitrust laws are laws that we must follow and are designed to create a level playing field in the marketplace (where Anderson Healthcare does business), promote fair competition and protect consumers from unfair trade practices.

### To demonstrate my commitment to this principle: I WILL...

- Avoid participating in any agreements to fix prices, bid rigging, collusion (including pricesharing) with competitors.
- Avoid discussing prices with competitors, including prices charged for the services offered by Anderson Healthcare and the prices paid by Anderson Healthcare for goods and services.
- Avoid participating in boycotts, certain exclusive dealing and price discrimination agreements.
- Avoid participating in bribery, theft of trade secrets, deception, intimidation and similar unfair practices.
- Not provide past, current or expected price lists, financial terms of managed care contracts or similar information to competitors or accept such information from a competitor of Anderson Healthcare.
- Not discuss with, provide to or accept from, competitor's strategic plans, budgets, wages, margins and other confidential information.
- Seek advice from Anderson Healthcare's Compliance Officer when confronted with business decisions involving a risk of violation of the antitrust laws.

## I understand...

- Payments for services must be consistent with fair market value.
- All business of the organization shall be conducted in a manner designed solely to advance the interests of Anderson Healthcare.
- Any travel and entertainment expenses must be reasonable, consistent with the organization's policies and appropriately incurred for the benefit of the organization.

## Tax

As a tax-exempt entity, Anderson Healthcare is required to act in compliance with applicable tax exempt laws, to engage in activities that support the organization's charitable purposes and to ensure that resources are used to further the interests of the organization, rather than the private or personal interests of any individual.

## I understand...

- I cannot contribute money, property, or services at Anderson Healthcare's expense to any political candidate, party, organization, committee or individual in violation of any applicable law.
- As a private citizen I may participate and be involved in the political process.
- I may be asked to make my own contact with members of the government, such as writing letters to present our position specific to certain issues.
- When making these communications on the behalf of Anderson Healthcare, approval and direction would be provided by the Chief Executive Officer after he has consulted with Administrative Council.
- We as an organization may address issues affecting Anderson Healthcare and our senior leaders would develop our position on legislative and regulatory matters.
- If I am contacted by legislators, the press, regulators or other parties as a representative of Anderson Healthcare that relate to our position on public issues, I will refer them to our Communications Director.

## Politics

The Anderson Healthcare organization is not allowed to use our funds or resources to contribute to or participate in political campaigns, or to give gifts or a payment to any political party or political organization unless consistent with state and federal law.

## Reporting Information Related to Finances

Financial reporting involves everyone in the organization and includes accurate reflection of time worked, expense reports, departmental and organization finance reports and accounting records.

To demonstrate my commitment to this principle:  
I WILL...

- Clock in and out in a way that shows my actual hours worked.
- Provide financial reports, accounting records, expense accounts, expense reports and other documents that accurately reflect facts and the true nature of the transaction.
- Understand that improper or fraudulent accounting, documentation or financial reporting is not in accordance with Anderson Healthcare policy and may be in violation of applicable laws.

### I understand this means...

This Code of Excellence and Code of Conduct provides general guidance regarding appropriate conduct, behavior and appearance. All actions taken by or on behalf of Anderson Healthcare must be consistent with the Code of Excellence and applicable laws. The legal requirements outlined are designed to provide guidance with respect to compliance with applicable laws. However, it is important to understand that these descriptions do not fully address all applicable legal requirements and that compliance with all applicable laws is expected, even if those laws are not specifically described in these Codes. Anderson Healthcare has developed a set of compliance and other policies that expand on and more fully address many principles covered in the Codes and it is important to be familiar with and follow those policies. For more specific information and guidance, please refer to the following documents:

- Employee Handbook
- Patients' Rights and Responsibilities
- Organizational and Departmental Policies and Procedures

If any questions arise with respect to compliance with the Code of Excellence, Code of Conduct or any law, such questions should be directed to the Compliance Officer. Failure to abide by the Code of Excellence and Code of Conduct may lead to a disciplinary action, ranging from verbal warning to immediate termination. The Code of Excellence and Code of Conduct do not provide any additional employment or contract rights to employees or other persons.

## Compliance with Code of Excellence and Code of Conduct

## Code of Excellence and Code of Conduct Reporting

We have the responsibility to report any activity that we believe violates the Code of Excellence or Code of Conduct. This includes activities that involve unethical behavior, or violate our policies or applicable laws. A violation of the Codes must be reported. No coworker may discourage or prohibit another coworker from reporting a violation or potential violation of these Codes or applicable laws.

There will be no retribution for asking questions or raising concerns about the Codes or for reporting possible improper conduct. Employees who report compliance concerns in good faith will not suffer adverse employment consequences or be discriminated against as a result of making a report. If you are unsure whether the Code of Excellence and Code of Conduct has not been followed, you can discuss the situation with your director and then decide if it should be reported. All reports will have a response – the response can include education, process changes or appropriate discipline. Reports and reporter's identity are kept confidential and anonymity is maintained, if possible.

### I will...

- Avoid retaliation against any person who reports unethical behavior or violation of the Code of Excellence or Code of Conduct or laws in good faith.
- Understand there are several ways to report:

Anderson Hospital:  
Confidential voice mail Hotline: Ext. 5362  
Intranet – Home page – Patient Safety and  
Compliance Hotline

Community Hospital of Staunton:  
Hotline Number: 888-644-5762  
Website: [www.MyComplianceReport.com](http://www.MyComplianceReport.com)

Discuss with my Supervisor, Manager, Director or  
Administrative Director

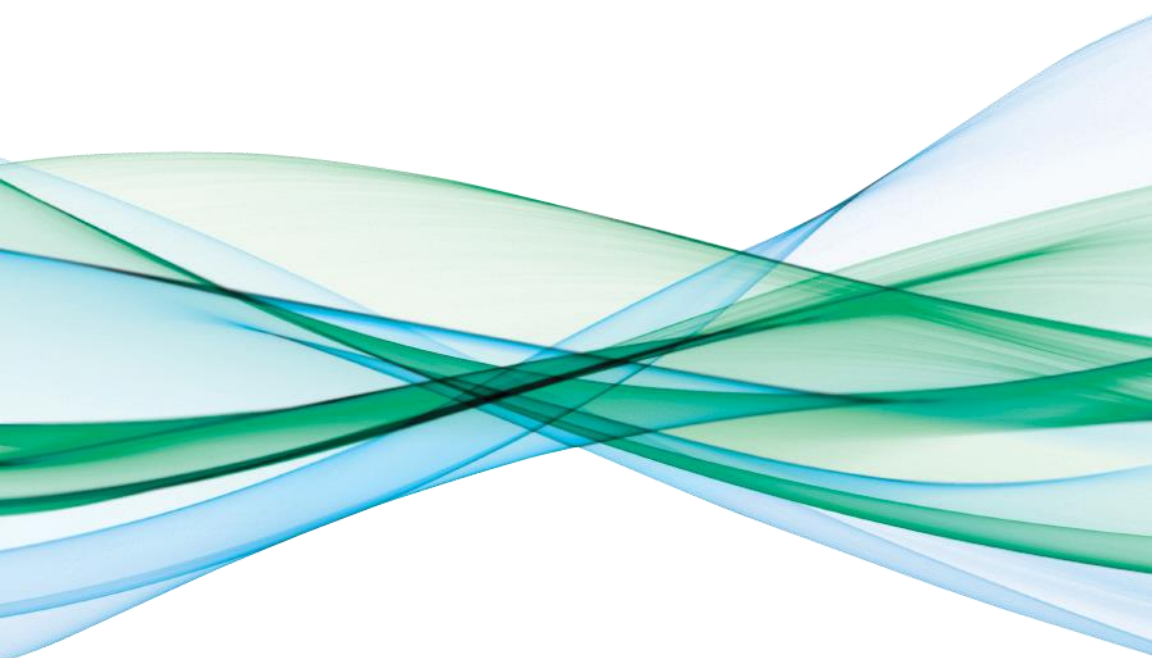
Discuss with Administrative Director of Human  
Resources or Compliance Officer by e-mail,  
voicemail or in person

**I further pledge and acknowledge the following:**

1. That it is my duty to know and understand the ethical standards, legal standards and company policies applicable to performing my daily tasks.
2. I pledge to act in compliance with the Code of Excellence and Code of Conduct and any compliance policies applicable to my responsibilities.
3. I pledge to be in full compliance with all applicable laws, federal health care program requirements and with Anderson policies and procedures.
4. I will report any conduct that I believe constitutes a violation of the Code of Excellence or Code of Conduct as outlined in the Codes.
5. I will seek advice from my Director, Manager, Supervisor, Administrative Director of Human Resources, or the Compliance Officer concerning appropriate actions that I may need to take in order to comply with the Code of Excellence or the Code of Conduct.
6. I understand that failure to comply with the Code of Excellence or Code of Conduct may subject me to disciplinary action.

## **Code of Excellence and Code of Conduct Acknowledgement Form**

This is to certify that I have received, read and understand the Code of Excellence and Code of Conduct. After reviewing the Code of Excellence and Code of Conduct, I have asked my director, manager or supervisor, Administrative Director of Human Resources or the Compliance Officer to clarify any areas in which I needed additional guidance. I acknowledge that I am fully aware that compliance with the Codes is a condition of my employment.



[www.andersonhospital.org](http://www.andersonhospital.org)  
[www.stauntonhospital.org](http://www.stauntonhospital.org)  
[www.andersonmedicalgroup.com](http://www.andersonmedicalgroup.com)  
[www.maryvilleimaging.com](http://www.maryvilleimaging.com)

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