

Health Quest Systems, Inc.

Code of Conduct

Health Quest Systems, Inc. (“HQ”) and its affiliates are committed to conducting their affairs in accordance with the highest ethical and legal standards. In order to maintain these standards, all those associated with HQ will perform their duties with integrity and honesty. In carrying out our mission and working towards our vision, we are guided by the following values:

Respect- We treat everyone with dignity.

Excellence- We strive to achieve increasingly higher standards in quality, safety, service and compassion.

Accountability- We recognize that each employee plays a significant role in meeting the needs of our patients, and take ownership for our actions and our commitments.

Compassion- We believe that the nature of our roles requires us to extend empathy to our patients, their families, and each other.

Honor- We support each other and work as a team. We celebrate and acknowledge individual and collective success, and demonstrate integrity in everything we do.

Why We Have a Code of Conduct

Our Code of Conduct reflects our collective commitment and our responsibility to uphold our organization’s reputation, practice ethical business behavior, meet rigorous professional standards, and comply with the laws, regulations and policies that govern our work. It is provided, in writing, at new employee orientation, and annually certified thereafter during mandatory compliance training. It is also available electronically through *dimensions* and the Health Quest web site.

What the Health Quest Systems, Inc. Code of Conduct Provides

- An overview of the commitments that govern our work
- Tools for reporting concerns or suspected violations promptly and safely without fear of retaliation
- Guidance in making decisions that may seem questionable or confusing

Our Commitment

The HQ Code of Conduct articulates our commitment to our values and ethical business behavior while reminding us that our overriding responsibility is to use sound judgment and demonstrate personal integrity and professionalism. The Code of Conduct has been adopted by the Executive Compliance Committee and applies to all affected individuals including:

HQ employees, members of the governing board, members of the medical staff, interns, students and volunteers when they are acting on behalf of HQ. Each of us is responsible for understanding and complying with the organizational policies and procedures emanating from our Code of Conduct.

We are committed to ethically treating:

Patients & Their Families – We are committed to providing safe, high quality medical care with respect for the privacy and the dignity of the patients and in recognition of the importance of our patients’ families. We recognize the need to maintain patient confidentiality, and we will use our best efforts to assure that no information is shared in an unauthorized manner.

Community – We are responsible neighbors, collaborating with other groups to improve the health status of our communities. We protect the environment in which we are located and comply with appropriate environmental laws.

Employees – We are committed to honesty, fairness, the provision of a safe and healthy environment and respecting each person’s dignity.

Medical Staff & Other Healthcare Providers – We are committed to providing the resources required for safe, high quality care, with honesty, fairness and respect for the competence of our caregivers. We will abide by all policies, regulations, and laws, including those relating to making or accepting patient referrals.

Volunteers – We respect and appreciate their service and generosity.

Supplier & Vendors – We are committed to ethical business practice and fair competition, and expect our suppliers and vendors to have the same commitment. We choose vendors objectively to provide the products and services that best meet our organization’s need.

Donors – We respect and honor their generosity and the intent of their donations.

Payers – We seek appropriate payment for services provided in compliance with the law and with appropriate documentation. We honor all contracts.

We are committed to:

Upholding the Laws and Policies that Govern our Work

Knowing and Adhering to Our Organizational Policies and the Law – We perform our work in compliance with all applicable state/federal laws, regulations, our organization’s policies and procedures, and the standards dictated by any applicable professional organization. We are responsible for knowing and complying with the legal requirements relevant to our jobs. We appropriately report any suspected wrongdoing or non-compliance and cooperate with activities and investigations that are conducted to ensure compliance.

(Refer to the HQ Organizational Policies and Procedures on *dimensions* and MCN Ellucid)

Preventing fraud, waste and abuse – We make every effort to prevent, detect, and correct fraud, waste and abuse. All reports of potential fraud, waste or abuse will be promptly and thoroughly investigated.

(Refer to the HQ Detection and Prevention of Fraud, Waste, and Abuse Policy on *dimensions*)

Objective Decision-Making/Avoiding Conflicts of Interest and Conflicts of Commitment – HQ recognizes that individuals associated with HQ have varied professional, financial and personal interests. HQ expects that these interests and commitments will be managed in a manner that does not harm HQ operations or reputation. A conflict of interest may exist in a variety of situations, including whenever an individual has an opportunity to use his or her position at HQ for personal gain or the gain of a family member or a friend; or when a person or group not associated with HQ might influence the work decisions of an individual. A conflict of commitment exists when outside consulting or other relationships keep an individual from devoting appropriate amounts of time, energy, creativity or other personal resources to his or her HQ responsibilities.

(Refer to the HQ Conflicts of Interest Policy on *dimensions*)

Appropriately Using Organizational Assets and Influence – We recognize the community has entrusted us with the responsibility and resources to provide safe, high quality health care. We safeguard, invest and use assets to achieve the mission of our organization. We use HQ resources for the benefit of HQ only, and it is an organizational decision, supported by the leadership of the system or one of its affiliates, to sponsor or support any outside organization or activity.

Giving or Receiving Gifts – It is the policy of HQ and its affiliates to maintain the highest standards of ethical conduct in their relationships with patients, visitors, suppliers and other agencies, firms and individuals with whom HQ has dealings. Consequently, the solicitation of gifts, gratuities, favors or kickbacks is strictly prohibited. As this issue can arise in a variety of settings, HQ has developed a policy that provides guidance and should be consulted whenever gifts are involved.

(Refer to the HQ Gifts and Gratuities Policy and HQ Compliance with Anti-Kickback Statute and Stark Law on *dimensions*)

Keeping Accurate and Complete Records – We follow established procedures to ensure the accuracy and reliability of our financial reports. We report information promptly and accurately to all regulatory agencies, payers and others. All patient records shall include the documentation required for medical necessity, quality care, and to comply with all payers, state and/or federal reimbursement regulations.

Respecting Patient Confidentiality – Everyone is expected to treat confidential information obtained through their employment or service to HQ with the utmost confidentiality. Information learned about a patient's medical treatment or condition is considered confidential as a matter of law and should be treated with particular care. Various

state and federal laws and regulations further protect certain types of information about a patient, notably the Privacy and Security Rules under the Health Insurance Portability and Accountability Act (HIPAA). It is essential, therefore, that individuals adhere to all applicable laws regarding the confidential and privileged status of medical records and communications. This information should be shared within HQ only as appropriate to ensure the optimum patient care and as provided in established policies regarding matters such as medical records, quality assurance, risk management, utilization review, administration, human studies, and research.

(Refer to the HQ Privacy and Security Policies on *dimensions*)

Corporate Compliance Program

In order to assist in complying with laws and regulations, HQ and its affiliates have adopted corporate compliance policies and programs. Every affected individual is expected to cooperate fully in the implementation of such policies or programs as requested and to comply fully with them. Our Corporate Compliance Program is designed to enhance our understanding of acceptable behavior and appropriate decision-making.

Corporate Compliance policies exist, and are available on *dimensions*, that provide detail on various compliance responsibilities and activities. These policies reflect the expectations found in this Code of Conduct. Included in these policies are disciplinary policies that outline the consequences of non-compliance.

Conduct contrary to these expectations will be considered a violation of the compliance program and related policies and procedures. It is our expectation that business is conducted in a manner that supports integrity in operations.

(Refer to the HQ Compliance Misconduct and Sanctions Policies on *dimensions*)

What should you do if you suspect a violation of our policies, values and commitment?

It is everyone's duty to promptly report any activity that appears to violate the Code of Conduct or any laws, regulations or organizational policies, or any organizational or clinical ethical issues. All HQ relevant organizational policies can be found on the *dimensions* site or in hard copy by asking your Department Management.

If you wish to obtain guidance on ethics or compliance issues, or if you are unsure about reporting a suspected violation, you may take any of the following actions:

Contact your direct supervisor. Voice your concern at the next supervisory level up to and including the highest level of management. Contact the Human Resources Department if the issue involves a human resource concern such as work conditions, discrimination or harassment, theft or abuse of property, and personal security. Contact the HQ Corporate Compliance Office; Call the Compliance Hotline at 844-Yes-WeComply (1-844.937.9326) or visit the Corporate Compliance site on *dimensions*.