

PURPOSE:

To reinforce St. Joseph's Health commitment to conducting business in an ethical and honest manner and within the bounds of the law.

APPLICABILITY:

- St. Joseph's Health
- St. Joseph's University Medical Center
- St. Joseph's Children's Hospital
- St. Joseph's Healthcare and Rehab Center
- St. Joseph's Wayne Medical Center
- Mission Health Coordinated Care
- St. Joseph's Health Partners

DEFINITIONS:

- N/A

POLICY:**CODE OF CONDUCT**

St. Joseph's Health is committed to conducting business in an ethical and honest manner and within the bounds of the law. This Code of Conduct is intended to provide employees, physicians, volunteers, vendors and other agents of St. Joseph's Health with guidelines for conducting business in a manner which fulfills that commitment. The Code of Conduct is supplementary to the mission, vision and values of St. Joseph's Health and applies to all who provide services under the auspices of St. Joseph's Health or its affiliates. The Code summarizes many topics from Compliance related policies. The Compliance related policies provide more specific guidance relating to the topics in the Code. It is the obligation of SJH team members to know and adhere to the policies, as well as the Code.

The Code is based on federal, state and local regulatory compliance and therefore compliance with all policies incorporated into the Code of Conduct is mandatory. Any violation will be handled in accordance with the Disciplinary Policy, as outlined in the Human Resources policies or other applicable policies and procedures of St. Joseph's Health and its Medical Staff. In addition, referral of certain matters will be made to government and regulatory agencies as appropriate. The offender may also be responsible in a civil suit for losses or other damages caused by his or her inappropriate conduct.

The Corporate Compliance Program

The Corporate Compliance Program has been established to prevent the occurrence of illegal or unethical behavior, to stop any such behavior as soon as reasonably possible after it has been discovered, to discipline the individuals involved (including those who know of violations but fail to report them), and to recommend and implement changes in policy and procedure necessary to avoid a recurrence of any prior violation.

Questions and How to Report Violations of the Standards

SJH encourages individuals to bring forward information and/or complaints about violations of state or federal law, SJH policy, rules or regulations.

Questions or concerns about potential violations may be addressed to a supervisor or department head as well as directly to the Corporate Compliance Department at 973-754-2859.

SJH also has a dedicated Compliance Hotline for employees and other individuals to report compliance concerns. The hotline can be accessed 24 hours per day, 7 days per week via telephone at 844-300-1079 or online at stjosephshealth.ethicspoint.com.

All reports to the hotline are confidential, and the reporter may remain anonymous. To ensure confidentiality, the hotline (telephone and website) is operated by an organization not affiliated with St. Joseph's Health. Follow up on all calls is available by a return call to the hotline. Retaliation against any individual who, in good faith, reports or who participates in the investigation of alleged violations is strictly forbidden. All reports of intimidation and/or retaliation relating to good faith participation in SJH's Compliance Program will be investigated by the Chief Compliance Officer or his/her designee. The possible sanctions that may be imposed on any individual who is found to have intimidated and/or retaliated against another individual include, but are not limited to, termination of employment.

St. Joseph's Health's Commitment to Compliance **St. Joseph's Health strives to . . .**

Provide Excellent Patient Care. St. Joseph's Health employees, physicians, volunteers and affiliates shall strive to treat all patients with a spirit of kindness, patience and understanding. Each patient is an individual and should be treated as such. Employees are expected to treat all patients with respect, with all patient needs and desires considered as health care decisions are made. Steps shall be taken so that each patient understands his or her treatment needs and options, treatment methods utilized, and treatment outcomes. SJH will provide services in a manner that provides care that is sensitive to cultural, racial, religious and other differences. St. Joseph's Health does not discriminate on the basis of race, religion, age, ethnicity, culture, language, socio-economic status, sex, sexual orientation, gender identity or expression, national origin, physical or mental disability, or source of payment. At all times, competent and qualified individuals will provide appropriate care, while considering the safety and well-being of the patients.

Comply with the Law. St. Joseph's Health is subject to numerous local, state and federal laws pertaining to all aspects of its operation. All employees, physicians, volunteers, vendors, and other agents of St. Joseph's Health are required to understand and abide by those laws which are applicable to them in the performance of their role.

Adhere to Anti Referral and Health Care Fraud and Abuse Legislation. All employees, physicians, volunteers, vendors and other agents of St. Joseph's Health are required to comply with laws which prohibit health care fraud and abuse. Activities that are prohibited include, but are not limited to:

- Intentionally or knowingly making false or fraudulent claims for payment or approval
- Offering or receiving remuneration (such as a kickback, bribe, or rebate) as an inducement to make a referral for the furnishing (or arranging for the furnishing) of any item or service
- Submitting false information for the purpose of gaining or retaining the right to participate in a plan or obtain reimbursement for services
- Referrals by a physician of Medicare or Medicaid patients to any entity for "designated health services" when the physician or an immediate family member has a financial relationship with the entity (unless the arrangement complies with applicable legal exceptions).

Follow All Antitrust Regulations. A number of activities engaged in by St. Joseph's Health are subject to state and federal antitrust laws. Generally, these laws prohibit agreements or actions that may illegally restrain trade or reduce competition. Examples of activities that violate these laws include, but are not limited to, agreements among competitors to fix or stabilize prices, inappropriate exclusive dealings, and boycotts of specified

suppliers or customers. Sharing information with a competitor, such as how prices are set, labor costs, or terms of supplier contracts may also violate anti-trust laws.

Adhere to Intellectual Property Laws. St. Joseph's Health is committed to adhering to all applicable intellectual property laws. All software used in connection with St. Joseph's Health's business must be properly licensed and used in accordance with that license. Additionally, St. Joseph's Health will respect the intellectual property and copyright laws regarding books, trade journals, magazines, and other applicable resources.

Conduct Advocacy Activities According to the Law. St. Joseph's Health may participate in lobbying activities or advocating the passage or defeat of certain legislation that pertains to issues that affect the healthcare community. Lobbying activities, or advocating the passage or defeat of certain legislation, shall not constitute a substantial part of the activities of St. Joseph's Health.

St. Joseph's Health does not participate or intervene in (including the publishing or distributing of statements), any political campaign on behalf of or in opposition to any candidate for public office.

While St. Joseph's Health supports employee participation in the political process, employees are not permitted to use positions in St. Joseph's Health to try to influence the personal decisions of others to contribute or otherwise support political parties or candidates except as lawfully permitted through political action committees.

Not Accept Inappropriate Gifts or Gratuities. The following standards apply to the giving or receiving of gifts and gratuities:

Receiving Gifts from Patients and Vendors: Employees and affiliates are prohibited from soliciting and/or accepting tips, personal gratuities, money or gifts from patients and vendors. Employees and affiliates may, however, accept non-monetary gratuities or gifts of a nominal value, such as cookies, flowers or candy if the gift would not influence, or reasonably appear to others to be capable of influencing, business judgment in conducting affairs with the patient or vendor.

If the value of the gift is substantial or there is any question regarding whether the gift meets this standard of reasonableness, the employee or affiliate must seek prior approval from the Corporate Compliance Department (who will take the request to the Executive Compliance Committee for review) or refuse the gift and promptly return the gift to the vendor or patient. Substantial gifts to SJH can be made by contacting the Chief Development Officer for the SJH Foundations.

Giving Gifts to Patients and Vendors: Employees and affiliates shall not offer or give money, services or other things of value with the expectation of influencing the judgment or decision making process of any purchaser, vendor, patient, governmental official or any other person.

An employee or affiliate who is in doubt about whether a situation involving the giving or receiving of something of value is acceptable, should ask his or her supervisor, or the Corporate Compliance Officer.

Avoid Conflicts of Interest. An individual has a potential conflict of interest when that individual or member of his or her immediate family has the ability to influence directly or indirectly a decision or action of St. Joseph's Health that leads or could lead to a personal, financial or professional benefit for the individual or his or her family or when an individual's interest or actions are adverse to the interests of the Hospital or patients.

It is expected that all employees and agents of SJH will carry out their duties honestly, responsibly and in full accordance with the highest ethical and legal standards. It is recognized that potential and actual conflicts of interest may arise as individuals perform their duties and carry out related activities. As a first step in

identifying and resolving conflicts of interest, all individuals subject to this policy shall immediately disclose any perceived potential or actual conflict of interest to his or her supervisor or the Corporate Compliance Department at 973-754-2859.

To enable SJH to manage, reduce or eliminate conflicts of interest, designated employees and other individuals who are engaged in making or influencing decisions on behalf of SJH or its patients are required to disclose, at least on an annual basis, all significant financial interests and relevant personal interests related to their work responsibilities. SJH has developed an electronic Conflict of Interest Disclosure Statement which is distributed annually to designated individuals. However, the obligation to report potential or actual conflicts is ongoing and any changes must be reported immediately. This may be done by contacting the Corporate Compliance Department at 973-754-2859.

Protect Confidential Information. St. Joseph's Health is committed to maintaining the confidentiality of patient, personnel, and other proprietary information in accordance with applicable legal and ethical standards. Consistent with HIPAA (Health Insurance Portability and Accountability Act), we do not use, disclose, access or discuss patient specific information with others unless it is necessary to serve the patient or otherwise required by law.

Keep Accurate and Complete Records. It is essential that St. Joseph's Health report accurate information to governmental entities and other third parties. In order to meet this obligation, it is equally essential that every employee accurately and clearly report the relevant facts or the true nature of a transaction. No employee should knowingly or with reckless disregard for the truth make any false or misleading statement on any form or to any other officer, employee or auditor for St. Joseph's Health. All patient records must meet the documentation standards required for quality care and to meet reimbursement regulations. Any individual who contributes to the medical record must provide accurate documentation and never alter or destroy anything that is part of the official medical record. Employee travel and entertainment related expenses must be accurately documented and supported when seeking reimbursement from the Hospital. Medical records and other business documents will be retained in accordance with state and federal law.

Protect the Environment. It is the policy of St. Joseph's Health to comply with all state and federal laws protecting the environment. Employees shall dispose of all waste and other materials and store all chemicals and substances in accordance with applicable laws and regulations. It is important to file all necessary environmental reports accurately and promptly and to cooperate fully with all governmental authorities in the event of an environmental incident.

Provide a Safe Workplace. It is the policy of St. Joseph's Health to comply with all applicable state and federal laws designed to improve workplace safety. St. Joseph's Health is committed to training employees to carry out their work in a manner that is safe for them, their coworkers and the patients they serve. SJH does not employ or contract with individuals or entities that are excluded or ineligible to participate in federal healthcare programs, suspended or debarred from federal government contracts, or have been convicted of a criminal offense related to the provision of healthcare items or services and have not yet been reinstated in a federal healthcare program, provided we are aware of such criminal offense.

Not Tolerate Harassment or Discrimination. It is St. Joseph's Health's policy not to discriminate on the basis of race, religion, age, ethnicity, culture, language, socio-economic status, sex, sexual orientation, gender identity or expression, national origin, physical or cognitive disability, or source of payment in providing services to patients or the public, nor in relation to employment practices. Furthermore, St. Joseph's Health prohibits harassment or discrimination of its employees in any form by supervisors, coworkers, customers or vendors.

Appropriately Use its Assets. All employees are charged with protecting and preserving St. Joseph's Health's assets and resources by following procedures to prevent their loss, theft or unauthorized use. No part of the net earnings of St. Joseph's Health shall inure to the benefit of, or be distributed to, its trustees, Executive Staff,

employees or other private persons having directly or indirectly any personal or private interest in the activities of St. Joseph's Health, except to the extent that such payments constitute reasonable compensation for services rendered in the necessary course of St. Joseph's Health's business.

Protect Access to Information Systems. St. Joseph's Health is committed to protecting all aspects of its information systems. All employees and other associates with access to St. Joseph's Health's computerized information system shall sign and abide by St. Joseph's Health's Responsible Use Policy, including the protection of confidential passwords and other access information.

Ethically Conduct Research and Clinical Trials. St. Joseph's Health is committed to following high ethical and legal standards when conducting research and clinical trials involving human participants. SJH adheres to all local, state and federal rules and regulations pertaining to research and clinical trials involving human subjects conducted by SJH employees and members of the medical staff. Patient rights will be respected during all phases of clinical trials. Any research involving human participants must be done in accordance with the policies and procedures of the SJH Research Department, Institutional Review Board and its governing bodies.

Approved Board of Trustees 11/14/2018