

# LIFEBRIDGE HEALTH

## CODE OF CONDUCT

### MESSAGE FROM OUR CHIEF EXECUTIVE OFFICER:

No matter what your role is at LifeBridge Health, you should take great pride in the uncompromising commitment we have to provide the highest quality health care experience for people in all stages of life. Your work truly exemplifies our CARE BRAVELY values.

Conducting yourself with integrity at LifeBridge Health means:

- upholding the highest standard of ethics and honesty and
- building trust by taking our COMMITMENTS seriously and following through to meet them

This involves a personal commitment to do the right thing at all times and in all situations, regardless of whether someone is watching.

This Code of Conduct has been designed to serve as a guide to ethical conduct and integrity for all representatives of the LifeBridge Health family--members of the boards of directors and board committees, members of the medical staffs, employees, and volunteers. The Code of Conduct provides you with general guidelines for ethical behavior. While it addresses many ethical issues you may encounter and helps you to understand your obligations, it does not describe every situation that you might face; therefore, ways to get assistance are also outlined in the Code for your reference.

Health care is a very complex and highly regulated industry. As such, opportunities for fraud, waste and abuse are abundant. The U.S. Government invests millions of dollars each year in programs designed to combat healthcare fraud and protect the future of important healthcare programs such as Medicare. Prosecutions of individuals for healthcare fraud have also increased dramatically. Although we have always conducted our business with the highest level of integrity, it is important that we remain vigilant.

It is the responsibility of everyone employed with LifeBridge Health and its subsidiaries to conduct all activities in a manner that is consistent with this Code of Conduct and LifeBridge Health's mission as a charitable organization. I ask that you read the Code of Conduct very carefully, thoroughly understand its contents, and refer back to it frequently. I expect all of you to demonstrate the highest standards of integrity and to report concerns if they do arise.

## OUR **COMMITMENT** TO OUR PATIENTS:

### Quality/Patient Safety:

At LifeBridge Health we build trust with our patients by delivering quality care in a safe, effective, and cost-efficient manner. In order to do so we will:

- Employ licensed and properly credentialed providers to care for our patients and ensure that any third party vendors providing such services also maintain the appropriate credentials.
- Perform assigned duties in an ethical, competent, and efficient manner.
- Utilize evidence-based best practices in medicine.
- Strive to ensure that all services provided are appropriate and medically necessary.
- Ensure that documentation in patient records is clear and complete and accurately reflects the item or service provided.
- Identify inaccuracies, inefficiencies, errors, hazards, etc. and report them promptly so that timely and appropriate action can be initiated.
- Protect our patients from negligence or abuse while they are under our care.
- Ensure that patients have access to resources to maintain their health upon discharge.

### Patient Rights:

We have a commitment to treat all LifeBridge Health patients with compassion, dignity, and respect. We will strive to respect the human dignity of each patient by listening carefully and responding to patients' questions, concerns, and needs in a timely and sensitive manner. We will not discriminate among patients based on race, color, ethnicity, sex, gender identity or expression, sexual orientation, national origin, age, mental or physical disability, pregnancy status, marital status, medical condition, veteran status, or any other characteristic protected by law. We will respect each patient's background, culture, religion, and heritage. We will promptly and courteously address any inquiries or requests and respond to patient complaints and grievances in a timely manner.

### Patient Choice:

We recognize that patients have a choice and should be actively involved in decisions regarding their health care. We will involve patients and their families, significant others, or designated representatives in decisions regarding the care delivered to the extent that such is appropriate and possible. We will inform patients about therapeutic alternatives, as well as the risks associated with the care they are offered, ensuring that appropriate consent is obtained prior to procedures or treatments.

### Healthcare Equity:

At LifeBridge Health we value all people equally. We support numerous community benefit programs to remove obstacles to health associated with social or demographic factors so that all individuals have an equal opportunity to attain the highest level of health possible.

Financial assistance is available to patients in the form of charity or discounted care, in accordance with LifeBridge Health's financial assistance policies.

Language assistance services are available for patients who do not speak or have difficulty with English.

EMTALA:

We comply with the Emergency Medical Treatment and Active Labor Act by ensuring that all appropriate patients are provided an appropriate medical screening examination to determine whether an emergency medical condition exists and receive any necessary stabilizing treatment or appropriate transfer regardless of the patient's ability to pay.

Research:

LifeBridge Health is committed to ensuring that all scientific research is conducted in a manner which adheres to high ethical standards and complies with the law. Research protocols must be reviewed and approved in advance. LifeBridge Health's Institutional Review Board (IRB) ensures that the rights and welfare of human subjects participating in research are adequately protected, the risks to subjects are outweighed by the potential benefits of the research, the selection of subjects is not coercive or biased, informed consent is obtained and documented where appropriate, and there is scientific merit to the proposal.

## OUR **COMMITMENT** TO OUR EMPLOYEES:

### Employee Rights:

At LifeBridge Health we recognize that employees are one of our most valuable assets and, as such, we have a commitment to treat all employees with respect and dignity. To fulfill this commitment, LifeBridge Health and/or its employees will:

- Ensure that all employment decisions are made on a non-discriminatory basis and without regard to an employee's or applicant's race, color, ethnicity, religion, sex, gender identity or expression, sexual orientation, national origin, age, mental or physical disability, pregnancy status, marital status, medical condition, veteran status, or any other characteristic protected by law. LifeBridge Health will not, however, hire any individual who is not legally eligible to work.
- Make reasonable accommodations for the known physical and mental limitations of qualified individuals with disabilities who request such an accommodation.
- Treat everyone with dignity and respect.
- Review all employees' performance in a fair and consistent manner.
- Base promotion decisions only on an employee's qualifications, performance, and potential within the organization.
- Commit to fostering an inclusive environment which discourages all forms of discrimination.
- Make every effort to provide an environment free from harassment and intimidation.
- Make every effort to resolve conflict in a reasonable and rational manner.
- Provide reasonable training opportunities to support the continued professional growth and development of employees.
- Promote a "Just Culture" and a culture of continuous process improvement.

### Employee Safety:

LifeBridge Health has a commitment to create and maintain a work environment that is safe for patients, employees, and visitors. To achieve this goal, LifeBridge Health has instituted policies and procedures to protect employees from workplace violence, accidental injuries, and exposures to hazardous substances. LifeBridge Health and/or its employees will:

- Create and maintain a work environment free of unreasonable hazards and in compliance with workplace health and safety laws, regulations, and standards, including infection control measures.
- Contribute to creating a safe work environment by providing the proper safety equipment.
- Strive to provide an environment free from violence.
- Utilize appropriate de-escalation techniques as they have been taught.
- Support legal action against an offender if violent actions continue and pose a threat or cause harm to an employee.
- Provide a drug-free workplace.

- Adhere to the controlled substance policy, ensuring that no illegal distribution or diversion of medication occurs.

Employees are expected to be familiar with potential hazards in their workplace and to comply with governmental regulations and LifeBridge Health policies related to workplace safety.

Disruptive Behavior:

Employees are expected to comply with all written and verbal instructions from supervisors and adhere to all applicable policies and procedures.

Effective communication among employees, physicians, patients, vendors, and/or visitors is a critical element in creating an environment of collegiality and teamwork, which are essential to providing high-quality and efficient patient care. All persons have a right to be treated with dignity, respect, and courtesy. To further this objective, public displays of inappropriate behavior will not be tolerated. Such types of inappropriate behavior include, but are not limited to:

- Shouting or disrespectful behavior
- Using abusive or offensive language or gestures
- Throwing objects
- Destruction of LifeBridge Health property
- Pushing, shoving, or engaging in acts of overt intimidation; and
- Unwelcome sexual advances, requests for sexual favors, and other verbal, written, or physical conduct (e.g., touching) with sexual intent or overtones.

Employees who fail to adhere to these guidelines are subject to the disciplinary process outlined in LifeBridge Health's Human Resources policies and may be terminated. Medical staff members who fail to adhere to these guidelines will face corrective action in accordance with the Medical Staff Bylaws. Any violations of these guidelines should be reported to the Chief Medical Officer or Human Resources.

Fair Labor Standards Act:

LifeBridge Health is committed to complying with the Fair Labor Standards Act. Overtime at a rate of one and one-half times an employee's normal pay rate will be paid to nonexempt employees for hours worked in excess of 40 hours in any one pay period. Non-exempt employees are not entitled to receive compensatory time off. All questions regarding overtime payments should be directed to the appropriate Human Resources representative.

## OUR **COMMITMENT** TO THE COMMUNITIES WE SERVE:

### Obligations of Tax-Exempt Organizations:

As tax-exempt organizations, LifeBridge Health and its tax-exempt subsidiaries must ensure that their resources are used in a manner consistent with their charitable purpose and in a manner that furthers the public good rather than the private or personal interests of any individual. LifeBridge Health and its tax-exempt subsidiaries will avoid any transaction that results in the misuse of charitable assets, accurately report payments to appropriate taxing authorities, and file all tax and information returns in a manner consistent with applicable laws.

### Political Contributions and Endorsements:

No funds of any tax-exempt entity within LifeBridge Health may be contributed to any political campaign or used to reimburse any individual for political contributions. Although LifeBridge Health may take positions on issues of concern, LifeBridge Health will not endorse any candidate for public office.

### Advertising and Marketing:

All LifeBridge Health advertising and other marketing activities will reflect only services available within the appropriate company's level of licensure and accreditation. Descriptions of LifeBridge Health services will be truthful and accurate. LifeBridge Health representatives will not make false or misleading statements about its capabilities.

### Environmental:

It is the policy of LifeBridge Health to manage and operate its businesses in a manner that conserves natural resources and protects the environment. All LifeBridge Health representatives are responsible for performing their responsibilities in an environmentally responsible manner, to recycle where practical, and to dispose of all waste in accordance with applicable laws and regulations.

## OUR **COMMITMENT** TO SAFEGUARD INFORMATION:

### Privacy of Patient Information:

LifeBridge Health patients trust us with the most intimate details of their personal lives. Maintaining the confidentiality of this information is a serious responsibility. All releases of patient information are to be in compliance with applicable federal and state laws and regulations, as well as any applicable institutional medical records policies. In addition, representatives of LifeBridge Health must:

- Limit access to protected health information to the **minimum necessary** to accomplish the assigned task.
- Not access personal health records except as necessary for their job responsibilities. (this includes records of family members, friends, colleagues, neighbors).
- Report any unauthorized disclosures to the Privacy Officer immediately.
- Ensure that posts to social media (e.g., Facebook, Twitter) do not make any reference to a patient or circumstances that could be traced back to a particular patient.
- Password-protect devices that contain protected health information.

### Privacy of Employee Information:

Employee data, including personal information, performance appraisals, and salary data, are confidential. Information on employees will only be released as provided for in the policies of the applicable LifeBridge Health entity.

### Proprietary Information:

The information, ideas, and intellectual property of LifeBridge Health are important to our success. Information pertaining to LifeBridge Health's competitive position or business strategies, as well as information concerning medical staff, personnel, finances, and contractual relationships, must be handled in a manner that protects against improper access or use by unauthorized individuals. All LifeBridge Health representatives must exercise care to prevent disclosure of such information.

### Intellectual Property:

LifeBridge Health representatives must ensure that copyrighted materials are not reproduced or distributed without the express written consent of the owner, except as permitted by law. In addition, LifeBridge Health must not violate the rights afforded by patents or other forms of intellectual property such as software licensing agreements and expects its representatives to do the same. Except as otherwise specifically agreed, intellectual property created by employees during the course of performing duties for LifeBridge Health is the property of LifeBridge Health. LifeBridge Health representatives are prohibited from obtaining any copyright or patent on material developed utilizing intellectual property or business equipment obtained at work without express permission from an authorized LifeBridge Health executive.

## OUR **COMMITMENT** TO FAIR AND ACCURATE BILLING:

### Documentation, Coding, and Billing for Patient Care Services:

At LifeBridge Health we have a commitment to prepare and submit accurate claims for payment from patients and third-party payers in accordance with all federal and state laws, including the Federal False Claims Act. To fulfill this commitment, we will:

- Maintain a vigorous compliance program to actively audit and monitor for fraud, waste and abuse.
- Ensure our employees are educated on fraud, waste and abuse.
- Present claims for payments that are accurate and for services that are appropriate and medically necessary.
- Assign diagnostic, procedure, and billing codes that accurately reflect the services that were provided.
- Ensure that LifeBridge Health representatives remain knowledgeable of and follow federal and state laws, regulations, and policies regarding the preparation and submission of claims.
- Respond to questions and complaints related to a patient's bill in a direct and honest manner.

### Federal and Maryland False Claims Acts:

The Federal False Claims Act makes it a crime for any person or organization to knowingly make a false record or file a false claim with the government for payment. "Knowing" can include deliberate or reckless ignorance of facts that make the claim false.

Examples of possible false claims include knowingly billing Medicare or other federal payors for services that were not provided, services that were not ordered by a physician or other authorized provider, services not documented, services not medically necessary, or services that were provided with such sub-standard quality that the government would consider the services worthless.

Violations of the federal False Claims Act may result in substantial penalties for each false claim, plus three times the amount of damages that the federal government sustains because of the claim.

A person who knows a false claim was filed for payment can file a lawsuit in federal court on behalf of the government and, in some cases, receive a reward for bringing original information about a violation to the government's attention. The False Claims Act protects persons who file a false claim lawsuit from being fired, demoted, threatened, or harassed by their employer for filing the suit. If a court finds that the employer retaliated, the court can order the employer to re-hire the employee, and to pay the employee twice the amount of back pay that is owed, plus interest and attorney's fees.

Maryland has enacted a law similar to the Federal False Claims Act that provides for criminal and civil penalties for the submission of false and fraudulent claims to the Maryland Medicaid program.

All persons associated with LifeBridge Health are required to comply with these laws.

LifeBridge Health does not tolerate retaliation or retribution against anyone who in good faith reports a legal or ethical concern. Anyone who attempts to retaliate against an employee for

good faith reporting of an issue will be subject to disciplinary action, including possible termination of employment.

## **PERSONAL ACCOUNTABILITY AND USE OF CORPORATE ASSETS:**

Employees build trust by conducting themselves in the workplace with a high degree of personal accountability.

### LifeBridge Health Property:

All persons affiliated with LifeBridge Health have a responsibility to preserve and protect the assets of the system. LifeBridge Health has established procedures to ensure that its assets are properly protected and that financial records and reports are accurate and reliable. Everyone affiliated with LifeBridge Health is expected to comply with internal control policies and procedures. Any misuse or suspected or actual theft of LifeBridge Health property must be reported to a supervisor and/or to Security.

Surplus or obsolete property and equipment must be disposed of according to LifeBridge Health's policies and procedures and government regulations.

### LifeBridge Health Funds:

LifeBridge Health representatives must properly use and protect system funds. When approving or certifying any invoice, employees are expected to have reasonable knowledge that the expense and amounts involved are correct. Travel and entertainment expenses must be consistent with LifeBridge Health policy.

### Personal Use of Corporate Assets and Property:

LifeBridge Health assets, including computer and telephone networks, exist to support the businesses of LifeBridge Health. All property of LifeBridge Health is to be used in a manner designed to further the interests of the system rather than those of any individual employee. Employees must obtain written approval from their divisional executive before engaging in any activity that involves the personal use of LifeBridge Health equipment, supplies, materials, or services.

LifeBridge property may not be taken for personal use. This includes paper, gloves, masks, scrubs, and other clinical and office supplies.

### Technology Use and Security:

Employees must use those technologies supplied by LifeBridge Health for the system's activities only and not for personal use or gain or for malicious or unlawful activities. These technologies include computers, computer media (CDs, USB drives, flash drives, etc.), printers, scanners, hand-held devices, copiers, fax machines, phones, voicemail, pagers, software, electronic files, email accounts, internet access, system accounts, identification badges, etc. Pornographic or other inappropriate material should not be downloaded to or stored on LifeBridge Health technologies.

While LifeBridge Health does not routinely monitor either electronic or voice mail communications, LifeBridge Health employees and others with LifeBridge Health accounts should not expect that these communications will be private. Electronic and voice mail communications may be accessed at any time for any purpose by authorized LifeBridge Health representatives without prior notification to the involved individuals.

Employees and others who are granted access to LifeBridge systems must never share system passwords with anyone. Users will be held accountable for all activities performed using their login IDs and passwords. Administrative passwords should never be shared with workforce members.



## **BUILDING TRUST BY PREVENTING CONFLICTS OF INTEREST:**

LifeBridge Health strives to do business with suppliers in a fair and honest manner by building relations on the basis of sound business and professional factors such as safety, competitive price, quality, delivery, service, and reputation. We will also consider the ethical and environmental standards of potential and existing suppliers in making purchasing decisions.

Representatives of LifeBridge Health may not solicit personal gifts, meals, entertainment, or services from any patient, visitor, vendor, or contractor.

### Gifts:

Gifts to individuals of cash or cash equivalents (e.g., gift cards, gift certificates, stocks) are strictly prohibited.

It is acceptable for a department, clinical unit, or clinical practice to accept a modest perishable gift (such as a floral arrangement, box of cookies, candy, or similar food items) to be shared by staff members on special occasions, such as holidays. Small promotional items and similar token gifts may also be accepted.

Individual employees may keep other unsolicited gifts (including items such as tickets to sporting events) only with the approval of the employee's supervisor. Employees who are directly involved in purchasing decisions or contract negotiations may not accept such gifts from an affected vendor while vendor selection or contract negotiation is underway.

Patients wishing to make a gift to employees should be advised that LifeBridge Health policy does not allow staff to accept personal gifts from patients or family members. Patients may be directed to the Development Department/Foundation for acceptance on behalf of the organization.

The Marketing Department may develop and distribute educational items that promote awareness of LifeBridge Health and its services consistent with LifeBridge Health's mission to provide community outreach and population health.

### Meals:

It is permissible to accept an invitation for a business meal or gathering during which the host is present and business is conducted.

### Entertainment/Travel/Social Events:

Coverage of travel expenses by a vendor or business associate is acceptable only when the subsidized individual is presenting at an educational or business-related conference, or when the travel is for the purpose of evaluating the vendor's products or services.

Coverage of travel expenses by outside organizations is prohibited when it is extended to an individual's spouse or family member, or the primary purpose is social (e.g., golf, sporting event, or other recreational activity).

Solicitation of industry support for LifeBridge Health fundraising events such as galas, golf outings, etc. are acceptable. However, vendor participation must be voluntary, with no commitment of future business as a result of any support offered.

LifeBridge Health employees are permitted to attend a LifeBridge Health fundraising event as the guest of a current or prospective vendor.

Employees may also attend other nonprofit organization events in the region as the guest of a vendor, provided the event is reasonable and directly supports the nonprofit organization.

#### Honoraria and Other Compensation:

Except as otherwise specifically agreed to, all compensation (including honoraria for speeches or similar activities) for work that is performed during time for which an employee or individual is being compensated by LifeBridge Health, or that is performed using LifeBridge Health resources, belongs to LifeBridge Health.

#### Referral Sources:

Financial relationships with referral sources are heavily regulated by federal and state law. In general, it is illegal to offer, pay, accept, or receive compensation of any kind in exchange for, or to induce, referrals of patients. All LifeBridge Health representatives are expected to comply with these rules in all respects in their dealing with individuals and entities to which any LifeBridge Health entity or representative makes, or from which any LifeBridge Health entity or representative receives, referrals. The rules in this area can be very complex, and individuals with questions concerning the legality of a particular arrangement should contact the Office of the General Counsel.

#### Biomedical, Pharmaceutical, and Medical Device Companies:

The acceptance of gifts, meals, or other compensation from biomedical, pharmaceutical, or medical device companies ("Industry Vendors") has the potential to influence the prescribing behavior and clinical decisions of physicians, in addition to potentially being considered the receipt of illegal kickbacks. All compensation received from Industry Vendors must be for legitimate services and must be consistent with the fair market value of those services.

Meals provided by vendors in a physician's office or in another on-campus setting may be accepted only in the context of a legitimate educational meeting or program and only with the approval of the applicable clinical chief or LifeBridge Health executive.

Small promotional items and educational items, such as textbooks, posters, and anatomic models may be accepted.

Donations from vendors for educational purposes may be accepted. The Development Department/Foundation should be informed of all such donations. . Donors may not condition their contributions on future purchases or other business relationships.

#### Anti-Competitive Practices:

LifeBridge Health representatives will comply with all antitrust laws and other laws governing business practices. In general, these laws forbid the following types of conduct:

(1) agreements, whether written or verbal, between competitors to fix fees or prices; (2) other types of collusion (including price sharing) with competitors; (3) group boycotts; and (4) unfair trade practices, such as bribery, misappropriation of trade secrets, deception, and similar practices.

LifeBridge Health representatives are expected to seek advice from the Office of the General Counsel when confronted with situations that may involve a risk of violating the antitrust laws.

#### Research:

All investigators involved in the conduct of clinical research must report any significant financial interest associated with a research study in their initial and continuing Institutional Review Board (IRB) applications.

Solicitation:

Solicitation on LifeBridge Health owned or leased property is not allowed without prior approval of LifeBridge Health Administration. Where approval is granted, LifeBridge Health will control the locations and times of solicitation, distribution, or selling.

Other Conflicts of Interest:

All directors, officers, employees, medical staff members, and volunteers are expected to recognize and disclose at the earliest possible time all actual and potential conflicts of interest. An individual is considered to have a conflict of interest with regard to a matter or transaction if the individual or a family member of the individual has a personal or financial interest that has the potential to influence the action taken by the individual on behalf of LifeBridge Health. Additional information regarding what constitutes a conflict of interest and how to disclose a conflict is contained in the LifeBridge Health Conflict of Interest policy.

Unless prohibited by an employee's contract, an employee may work for other organizations as long as doing so does not interfere with his/her job responsibilities at LifeBridge Health. If the second job is with an organization that is a competitor, customer, or provider of goods or services, the employee is obligated to comply with the confidentiality and other policies described in this Code, and LifeBridge Health reserves the right to require the written approval of the employee's supervisor and the Compliance Officer.

Employees of LifeBridge Health should not have a substantial investment in LifeBridge Health's competitors, customers, or suppliers. A substantial interest in a competitor, customer or supplier is generally one in which the employee owns more than five percent of the company's value. Employees who have a substantial interest in such a supplier, customer, or competitor are obligated to report this information to the Compliance Officer. In addition, any employee involved in a business transaction with a company on behalf of LifeBridge Health and who has a direct or indirect personal interest in that company should inform his/her supervisor and the Compliance Officer of this relationship.

An individual is not eligible to be hired or transferred into a position in which he/she will be supervised by a family member, or by someone with whom the individual has an intimate relationship. For further guidance, refer to the Nepotism policy.

The actions of family members outside of LifeBridge Health workplace can also constitute a conflict of interest for employees. Examples include: gifts or benefits offered to family members by LifeBridge Health suppliers; significant investments in LifeBridge Health customers, competitors, or suppliers by family members; and influential positions in competing companies held by family members. These types of situations have the potential to influence an employee's objectivity in making decisions on behalf of LifeBridge Health, and should be disclosed to the Human Resources or Compliance Department. Close family members include a spouse, parent, stepparent, child, stepchild, sibling, stepsibling, nephew, niece, aunt, uncle, grandparent, grandchild, in-laws, and adoptive relationships of the above relationships, as well as persons sharing the same household.

## **DOING THE RIGHT THING – HOW TO PROTECT OUR INTEGRITY:**

The business and affairs of LifeBridge Health are, at all times, to be conducted in a manner consistent with this Code of Conduct. Failure to abide by the Code of Conduct may constitute grounds for disciplinary action, including possible termination of employment or medical staff membership.

### **Reporting a Concern:**

Supervisors and managers have a special responsibility to create and uphold the reputation of LifeBridge Health for integrity and trust and to foster an environment that encourages ethical behavior. To accomplish this, supervisors and managers are accountable for making sure that employees in their area understand and comply with the Code of Conduct and other LifeBridge Health policies. All supervisors and managers are expected to be alert for areas of noncompliance, and to promptly take action concerning matters that come to their attention. Failure to do so may subject the supervisor or manager to disciplinary action.

All LifeBridge Health representatives have an obligation to report violations of this Code of Conduct, LifeBridge Health policies, or any suspected illegal or unethical activity. No reprisals or disciplinary action will be taken or permitted for good faith reporting of, or cooperating in the investigation of, illegal acts or violations of this Code.

We suggest that all employees first go to their supervisor when they have a concern about ethical conduct or have a question about proper conduct. However, there may be times when turning to your supervisor is uncomfortable or inappropriate. If this is the case we suggest you contact **The Compliance Hotline: 844-732-6233 or contact Laura Callahan, the Chief Compliance Officer at 410-601-4832.**

All concerns received by the Compliance Department, either directly or through the hotline will be opened as a formal investigation within 48 hours of receipt.<sup>1</sup> The outcome of the investigation will be provided to the complainant recognizing not all outcomes or actions taken are able to be disclosed. All compliance concerns received shall be resolved within 45 days unless there are extenuating circumstances in which case they will be documented.

### **Cooperation with Investigations:**

It is LifeBridge Health's policy to promptly and thoroughly investigate reports of illegal activity, failure to follow policies, or violations of this Code. Employees must cooperate with these investigations. You must not take any actions to prevent, hinder or delay discovery and full investigation of illegal acts or violations of this Code.

LifeBridge Health and its representatives shall cooperate fully and promptly with appropriate government investigations into possible civil and criminal violations of the law. It is important, however, that in this process LifeBridge Health is able to protect the legal rights of the company and its representatives. To accomplish these objectives, any governmental inquiries or requests for information, documents or interviews should be promptly referred to the Office of the General Counsel (410-601-5129).

Representatives have a right to speak with a government investigator and LifeBridge Health will not infringe on that right. You should also be aware that you have a right to consult with an attorney before answering any questions and to have an attorney present during questioning.

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<sup>1</sup> Any hotline call prioritized as a "Severity Level 1" by the Compliance Line will be opened immediately.

Representatives who participate in government interviews will give answers that are truthful, complete and unambiguous. Representatives also must never conceal, destroy or alter any documents.

*The Code of Conduct is not to be interpreted as creating a contract between any individual and LifeBridge Health or any LifeBridge Health affiliate. Rather, it is designed to help representatives of the LifeBridge Health family conduct LifeBridge Health activities in accordance with all applicable legal and ethical standards.*

## Resources for Raising and Reporting Concerns:

For assistance with specific issues:

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If the Issue Concerns:	Contact this Resource:
<ul style="list-style-type: none"><li>• Human Resources issues:<ul style="list-style-type: none"><li>○ Employment practices</li><li>○ Discrimination/harassment</li><li>○ Respect in the workplace</li><li>○ HR Policies</li><li>○ Workplace Violence</li></ul></li></ul>	<p>Your HR Business Partner or Employee Relations</p> <p>Security, Human Resources, LBH Quality</p>
<ul style="list-style-type: none"><li>• Fraud</li><li>• Misuse of company resources</li></ul>	<p>Compliance</p> <p>Compliance or General Counsel</p>
<ul style="list-style-type: none"><li>• Confidential information:<ul style="list-style-type: none"><li>○ Privacy</li><li>○ Information security</li></ul></li></ul>	<p>Privacy Officer</p> <p>Chief Information Security Officer</p>
<ul style="list-style-type: none"><li>• Conflicts of interest</li></ul>	<p>Compliance or General Counsel</p>
<ul style="list-style-type: none"><li>• Laws</li></ul>	<p>General Counsel</p>
<ul style="list-style-type: none"><li>• Other legal questions</li></ul>	<p>General Counsel</p>
<ul style="list-style-type: none"><li>• Political activities</li></ul>	<p>Government Affairs</p>
<ul style="list-style-type: none"><li>• Environmental issues</li></ul>	<p>Facility Safety officer</p>
<ul style="list-style-type: none"><li>• Contacts to/from Media</li></ul>	<p>Corporate Communications</p>
<ul style="list-style-type: none"><li>• Donations from vendors/patients</li></ul>	<p>LBH Development Department/Carroll Hospital Foundation</p>

(Consult your applicable phone directory for telephone numbers of the above resources)

CODE OF CONDUCT ACKNOWLEDGEMENT

I acknowledge that I have reviewed the Code of Conduct. I have had the opportunity to ask questions about the Code and my obligation to comply with its requirements. If I have more questions I will ask my supervisor or manager, or call the Compliance Office or hotline.

I understand how the Code of Conduct relates to my position within LifeBridge Health and I agree to comply with the Code and all related policies and procedures. I acknowledge that the Code provides guidelines for ethical business conduct and does not constitute an employment or other contract.

I agree to report any violation of the Code of Conduct of which I become aware. I understand that my duty to make such prompt disclosures is an important part of my responsibilities and any violation of the Code may be grounds for disciplinary action, up to and including termination.

**Except as stated below, as of this date, I have no knowledge of any transactions or events that appear to violate the Code of Conduct.**

I am aware of the following situations which may be violations of the Code of Conduct:

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Date:

Name:

\*\* Note that the Code will be distributed via Healthstream, so this acknowledgement will be electronic.