



Code of Conduct





Dear Methodist Le Bonheur Healthcare Associate:

The Methodist Le Bonheur Healthcare Code of Conduct is provided to assist each of you in addressing legal, regulatory or ethical issues that you may encounter as an Associate. We hope you will use this Code as a guide to help you understand the legal and ethical obligations of your role. Our Code of Conduct applies to everyone working at MLH including Associates, leaders, providers, physicians, volunteers, students, vendors, business associates, contract personnel, senior executives, officers and the Board of Directors. If you have any questions concerning the content of this Code or business situations not covered in this document, please contact your supervisor or our Corporate Compliance Department.

The MLH Code of Conduct was developed to further promote and enhance the long-standing culture of compliance in our organization.

- Leaders are responsible for ensuring Associates understand and comply with our Code of Conduct and with any applicable laws, regulations and guidelines specific to their role here at MLH.
- Associates are responsible for reading and understanding the Code of Conduct and are accountable for complying with these standards. Associates are encouraged to ask questions if uncertain about ethical and legal conduct.

MLH encourages Associates to report issues that could potentially violate applicable laws, regulations and/or our Code of Conduct. If you suspect that a violation has occurred, you should immediately contact your supervisor, the Corporate Compliance Department or call the Compliance Hotline at 1-888-220-2163. You have the assurance, as communicated in our Non-Retaliation Policy, that MLH will not tolerate retaliation or retribution against any Associate who, in good faith, brings an issue forward.

As the regulatory environment continues to change, we must constantly monitor our internal operations to ensure that we are in compliance with the laws and regulations facing us today, tomorrow and in the future. By adhering to and embracing this Code, you are demonstrating your commitment to our mission of providing the highest quality healthcare to the communities we serve.

Sincerely,

Michael Ugwueke
President and Chief Executive Officer



Building a
Culture of Compliance
begins with you.

OUR MISSION

To enhance your health and well-being through high-quality, innovative and compassionate care.

OUR VISION

Methodist Le Bonheur Healthcare will be nationally recognized for excellence in clinical quality, patient safety, and compassionate care to improve every life we touch.

OUR CULTURE

Our culture is built on the foundations of service, care and compassion, and rooted in our rich history – a history that manifested from the dream of Mississippi planter, John Sherard. As demonstrated by our founder, one person can make a difference. We believe in the Power of One and our Power of One Culture lives and thrives throughout our organization. Associates are the strength of Methodist Le Bonheur Healthcare and together we achieve amazing results!

OUR VALUES & GUIDING BEHAVIORS

SERVICE – *Patients and families are at the heart of all we do.*

Our Guiding Behaviors:

- I serve with a compassionate spirit and treat others with dignity and respect.
- I accept and value differences among people.
- I listen to understand and meet the needs of patients and families.

QUALITY – *We consistently provide the highest quality of care through safe, proven practices.*

Our Guiding Behaviors:

- I maintain respectful partnerships with our patients, families and other staff to provide safe, reliable care.
- I openly share information with patients, families and my colleagues to achieve the best results.
- I seek out best practices and take ownership for applying them.

INTEGRITY – *We accept and honor the trust placed in us through our faith-based mission.*

Our Guiding Behaviors:

- I follow through on commitments.
- I hold myself and others accountable for actions and outcomes in the care of the patient, their families and each other. I do the right thing.
- I do the right thing.

TEAMWORK – *Together we are better.*

Our Guiding Behaviors:

- I take personal responsibility for working as part of a team to support patients and families.
- I am willing to provide feedback, to be coached and to coach others for high performance.
- I recognize the contributions of every individual, show appreciation and celebrate successes.

INNOVATION – *We are a learning organization and embrace new ways to get better results.*

Our Guiding Behaviors:

- I am personally willing to change.
- I am curious and openly seek new approaches, processes, technology and practices to improve outcomes.
- I collaborate with patients, families and my team to implement new ways of improving the health care experience.

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INTRODUCTION

Methodist Le Bonheur Healthcare (MLH) is committed to serving our patients, physicians, Associates and communities in an ethical, legal and responsible manner. We are committed to:

- Providing services and conducting business activities in compliance with federal, state and local laws and regulations, company policies and procedures and our Code of Conduct.
- Adhering with the requirements applicable to federal health care programs and the submission of accurate claims.

Our Code of Conduct provides guidance on various topics and daily activities to ensure appropriate ethical and legal standards and compliance goals are met.

In addition to our Code of Conduct, we must follow MLH policies and procedures that provide detailed guidance to Associates and other workforce members. Healthcare is a heavily regulated business and it is important to clearly understand and follow the MLH policies and procedures. Failure to follow or report suspected violations of our Code of Conduct, MLH policies and procedures, or federal healthcare program requirements or statutes can result in serious damage to MLH in the community, government enforcement action against the organization or individuals, and disciplinary action for individuals.

If you encounter situations not covered or have any questions about this content, please ask your supervisor or the Corporate Compliance Department.

Code of Conduct

- **Think and act ethically.**
- **Know and follow the rules.**
- **Keep it confidential.**
- **Avoid gifts.**
- **Bill accurately.**
- **Report suspicious activity.**
- **Ask questions.**

Your Responsibilities

Associate Responsibilities:

Read and Understand MLH Policies and Procedures

Familiarize yourself with MLH Compliance and HIPAA Privacy Policies and Procedures, available on the MLH Intranet website on MOLLI. If you do not understand a policy or you have a question, contact your supervisor or the Corporate Compliance Department. You are responsible for knowing and complying with MLH Policies and Procedures.

Federal, State, Local Laws and Regulations

Know and follow laws and regulations that relate to your job role. Ask your supervisor questions if you are unsure.

Compliance is the responsibility of each of us.



Leadership Responsibilities:

Culture of Compliance

MLH Leaders are expected to promote an effective culture of compliance in our organization and to set examples of MLH values, ethical behavior and business integrity in our work environment.

Open Door Policy

Leaders (supervisors, managers, directors) are responsible for creating a work environment that is free from retaliation and encourages the reporting of compliance violations, concerns or asking questions. Associates should feel comfortable reporting issues in “good faith” or asking Leaders questions without fear.

Teamwork

Leaders are expected to promote teamwork between Associates, physicians and other support staff to strive for high quality, cost-effective healthcare, regulatory compliance and ethical business management.

Education of Associates

Leaders are responsible for ensuring their team members have the necessary information to comply with laws, regulations, MLH policies and procedures, and the MLH Code of Conduct in job specific training, department staff meetings or other educational venues. Leaders are accountable for educating their staff about compliance with the MLH Corporate Compliance Program, taking steps to prevent violations, and to take prompt action for violations that occur.

Your Role

Responsibility to Report Compliance Concerns

MLH is committed to ethical and legal conduct and correcting any wrongdoing in the organization. An “Open Door” environment at all levels of management at MLH promotes communication and encourages compliance-related questions and concerns. Reporting potential compliance violations is an important part of the MLH Compliance Program.

Associates have the responsibility to immediately report compliance concerns or misconduct, including inappropriate or illegal activity, violation of laws, regulations, MLH Policies or Procedures by an Associate, physician, vendor or subcontractor. Associates are encouraged to report problems, concerns, or to ask questions or to seek clarification of a policy of procedure, law or regulation.

Raising Questions

If unsure, ask!

This Code cannot describe every situation that could arise in your daily work. If you cannot find an answer in the Code, or if you have questions on how to interpret the Code, ask for help.

Q:

How do I know if I should report a concern?

A:

Ask yourself:

- Does the conduct appear unethical or dishonest?
- Am I unsure if this activity is legal?
- Could this action harm patients or Associates?
- How would this look on the front page of a newspaper?

If something doesn't seem right, it's always best to seek guidance or make a report.



How To Report Compliance Concerns and Violations

If you have questions or concerns about an issue or activity being unethical, illegal or wrong, or suspect a compliance violation, use the following process for answers or to report concerns:

- Speak with your supervisor or manager.
- Call the **Compliance Hotline: 1-888-220-2163**
(Available 24 hours a day, 7 days a week)
You may request to remain anonymous when reporting an issue to the Compliance Hotline.
- Contact the **MLH Corporate Compliance Department**

VP/Chief Compliance & Privacy Officer

Loretta Hinton, Esq.
(901) 478-0553
Loretta.Hinton@mlh.org

Director, Corporate Compliance

Stacy Norton, CPC, CCS, CHC, MBA
(901) 478-0571
Stacy.Norton@mlh.org

Manager, Privacy

Laritha Boone, MBA-HCM, RHIA
(901) 478-0547
Laritha.Boone@mlh.org

Non-Retaliation Policy

MLH prohibits retaliation for good faith reporting of potential misconduct. Any retaliation – whether direct or indirect – against associates who raise a concern in good faith or cooperate in an investigation is grounds for discipline up to and including termination.

Policy Link: <https://methodisthealth.policystat.com/policy/10750232/latest>

Violations of Our Code of Conduct

The standards set forth in our Code of Conduct are mandatory and must be followed. All individuals who participate in the work and mission of Methodist Le Bonheur Healthcare are expected to adhere to this Code of Conduct. This includes all Associates, Medical Staff, non-employed providers with medical staff privileges, contractors, vendors and volunteers. Violations of our Code of Conduct may result in disciplinary action up to, and including, termination of employment or contract for services.

The following are some examples of conduct that may result in disciplinary actions:

- Knowingly authorizing or participating in a violation of laws or regulations.
- Deliberately falsifying documentation in medical records.
- Discriminatory behavior
- Retaliating against individuals who report concerns in good faith
- Willfully providing false information to MLH and/or a third party

Policy Link: <https://methodisthealth.policystat.com/policy/11325043/latest>



SERVICE

Patients and families are at the heart of all we do.



Protecting Patient Rights

At MLH, we strive to provide quality care to all patients regardless of race, color, age, religion, creed, sex, national origin, sexual orientation, gender identity or expression, disability, citizenship, or any other legally protected status. Patients have the right to participate in, and make decisions about, their healthcare. Patients' rights are respected, with Associates recognizing that each patient is an individual with unique health care needs.

We commit to provide considerate, respectful care, recognizing the patient rights as outlined in the MLH Patient Information Guide and in signage displayed within facilities.

Policy Link: <https://methodisthealth.policystat.com/policy/12235555/latest#autoid-m7dgx>

Handling Patient Complaints and Grievances

MLH staff utilize the "MLH CARES" model as a guide in order to resolve patient complaints and concerns as they arise. Patients can freely voice complaints without being subject to coercion, discrimination, reprisal or interruption of care. In addition, MLH has a formal process in place for addressing patient grievances.

Policy Link: <https://methodisthealth.policystat.com/policy/13468804/latest/#autoid-8j7vx>

Safeguarding Personal Health Information (PHI)

Depending on your role at MLH, you may have access to confidential and proprietary information, such as patient medical records, confidential business, research and financial information. Patient information has additional privacy protections under state and federal laws, including HIPAA, and we all have a duty to protect the confidentiality and security of that patient information.

Our Notice of Privacy Practices describes how patients' medical information may be used and shared and how patients can get access to that information. MLH has implemented specific policies and procedures to protect the privacy and security of PHI. You are responsible for following our policies on privacy, including how to appropriately use and share patient information. Accessing patient information for any non-job-related use is strictly prohibited and may result in termination.

Policy Links:

<https://methodisthealth.policystat.com/policy/11488366/latest>
<https://methodisthealth.policystat.com/policy/11488735/latest>
<https://methodisthealth.policystat.com/policy/11488909/latest>

Serving the Community

As a faith-based organization, MLH works diligently to offer many levels of support and involvement within our Mid-South communities. Our mission calls us to provide compassionate, holistic care with a spirit of healing and hope for all persons in the communities we serve. MLH offers a host of community-based services ranging from health education seminars, support groups, community health fairs, school mentor programs, and various health-screening opportunities.

Political Activity

You are encouraged to take part in community and political affairs and to vote in elections. However, in your participation in political activities, you are acting as a private citizen and not as a representative of MLH. We never conduct personal political activities during work hours or reference MLH or our position at MLH.

DO:

- Follow MLH policies for company-sponsored charitable giving
- Participate in MLH community service volunteer opportunities
- Contribute to MLH approved fundraising efforts that support healthy communities

DON'T:

- Contribute to unauthorized charities using MLH name
- Participate in community service activities that may create an actual or potential conflict of interest without following the Conflict of Interest disclosure process
- Use company time or assets to perform political activities
- Distribute political literature at work
- Use MLH email service to communicate personal opinions to other individuals, elected representatives, government agencies, newspapers, periodicals, or other external organizations.
- Enter, directly or indirectly, any political contribution on an expense account that causes MLH to reimburse for that expense. This includes the cost of fundraising tickets for political functions and fundraising dinners



QUALITY

We consistently provide the highest quality of care through safe, proven practices.

Providing Quality Patient Care

MLH is committed to providing our patients with safe, effective care of the highest quality in a supportive, respectful, and compassionate environment. Our Associates are committed to patient safety and providing exceptional patient- and family-centered care.

We promise to:

- Always keep our patients safe.
- Always treat our patients with dignity, respect and compassion.
- Always listen and respond to our patients and their families.
- Always keep our patients and families informed and involved.
- Always work together as a team to provide our patients outstanding healthcare.

Accreditation

Accreditation by the DNV and other accrediting bodies is an important symbol of MLH's commitment to the highest level of patient care. On occasion, accrediting or governmental agencies may conduct surveys in our facilities. Associates and healthcare partners should engage with representatives from accrediting agencies and external surveyors with transparency, honesty, and accurate information. No action should ever be taken to directly or indirectly mislead or obstruct accrediting or external surveyor activities.

Credentialing and Licensing

Some of us are in positions which require professional licenses, certifications, or other credentials to practice their professions. When a license/credential is required for the position, it is the responsibility of the Associate to maintain a valid license/credential at all times. You should be able to provide evidence of compliance with all federal, state, or local professional licensing requirements.

Policy Link:

<https://methodisthealth.policystat.com/policy/12900056/latest>

Keeping Accurate Records

MLH maintains complete, accurate and current business and medical records. We rely on the integrity of these records to make good decisions. Our records are prepared accurately, reliably, honestly and in accordance with established finance, accounting and medical record-keeping requirements.

All records are stored in a safe and secure location for the period of time required by law or our record retention policy, whichever is longer. Old or unneeded records, either in electronic or paper form, are properly disposed of or purged in accordance with applicable document retention schedules. Records and documents are never destroyed or altered in anticipation of, or in response to, a request for those documents by any government agency or court. Medicare cost reports will accurately reflect the operating costs associated with patient care.

Policy Link:

<https://methodisthealth.policystat.com/policy/10701151/latest>

DO:

- Comply with medical record-keeping policies and internal controls
- Ensure records accurately reflect transactions and interactions
- Follow our policies and processes for contracts, including the legal approval process
- Follow all record retention policies

DON'T:

- Create false or misleading records
- Commit to any contract, payment or other obligation unless authorized to do so per MLH policy
- Make business agreements outside of our contracting process
- Destroy records that are subject to legal hold or required to be saved under retention policy



INTEGRITY

We accept and honor the trust placed in us through our faith-based mission.

Complying with Healthcare Laws and Regulations

Complying with the many laws and regulations that govern healthcare is an integral aspect of operating our organization consistent with our core value of integrity. We are committed to following all laws and regulations and conducting our business in a legal and ethical manner.

Anti-Corruption

We do not give, promise, offer or authorize the giving of anything of value, either directly or indirectly through a third party to a foreign government official for the purpose of influencing any act or decision of such person to obtain business or an unfair advantage to otherwise obtain or retain business for MLH. Similarly, we do not solicit, accept or attempt to accept – directly or indirectly – a bribe, kickback or other improper benefit in connection with transactions contemplated.

Antitrust

We compete fairly and comply with antitrust laws. We do not engage in activities or negotiate agreements that restrain or obstruct competition or illegally share proprietary information with competitors.

We never discuss or otherwise communicate with competitors about:

- Prices, profit margins, costs
- Payer contracts or regions
- Allocation of patients
- Product or marketing plans
- Dividing up customers, territories or markets
- Salary or wage ranges, benefits, compensation policies, staffing policies, employment contracts or severance agreements
- Agreeing with competitors to boycott, refuse to deal with, or terminate any supplier, vendor, competitor, payer, physician or other provider

EMTALA

We comply with all requirements of the Emergency Medical Treatment and Labor Act (EMTALA), including providing a medical screening examination to all patients who seek emergency treatment and necessary stabilization, regardless of the ability to pay. Provided we have the capacity and capability, anyone with an emergency medical condition is treated.

- In an emergency situation or if the patient is in labor, we will not delay the medical screening and necessary stabilizing treatment in order to seek financial and demographic information.
- We do not admit, discharge or transfer patients with emergency medical conditions simply based on their ability or inability to pay or any other discriminatory factor.
- Patients with emergency medical conditions are only transferred to another facility at the patient's request or if the patient's medical needs cannot be met at the MLH facility (e.g., we do not have the capacity or capability) and appropriate care is knowingly available at another facility. Patients are only transferred in strict compliance with state and federal EMTALA regulatory and statutory requirements.
- Patients have the right to have a family member or representative of their choice and their own physician notified promptly of admission to a hospital.
- We do not advise patients to go to another hospital based on waiting times or services offered at the hospital. For example, a pregnant patient arriving at the Emergency Room will not be asked to go to another hospital with Obstetrical Services.

Guiding Principles that govern our interactions with physicians and other referral sources:

We do not pay for referrals.

- Patient referrals are based on medical need and our ability to provide the service
- Never offer to pay anyone for patient referrals

We do not make referrals based on financial relationships

- Never offer to pay or give something of value to anyone for patient referrals

We do not accept payments for referrals we make

- When making referrals, we do not take into account the volume or value of referrals the other provider makes to us
- No “quid pro quo” (this for that) arrangements

False Claims Act

The Federal False Claims Act and Deficit Reduction Act protect government programs including Medicare, Medicaid and TRICARE from fraud and abuse. These laws prohibit knowingly or recklessly submitting false claims to the Government, or causing others to submit false claims. MLH follows these laws and has policies to detect, report and prevent waste, fraud and abuse. We actively work to prevent the occurrence of any fraudulent or false claims. If you find or suspect a billing, coding or documentation error, report it immediately to your supervisor or Corporate Compliance.

Anti-Kickback Statute/Stark Law

The Anti-Kickback Statute prohibits offering or paying (or asking for or receiving) anything of value to induce the purchase, order or recommendation of products eligible for payment by a Federal healthcare program. The Stark Law prohibits a physician from referring business to an entity in which the physician or an immediate family member has a financial relationship, and prohibits the entity from billing Medicare and other payers for the designated health services performed based on a prohibited referral.

MLH does not offer, ask for, pay or accept anything of value in exchange for patient referrals, regardless of patient’s insurance coverage. This prohibition includes both referral to our care and referrals we make to other health care providers. If someone offers, asks for, pays or accepts something of value in exchange for a referral or healthcare order, it can be considered an illegal kickback.

Financial arrangements may also be considered kickbacks. Examples include an employment agreement that rewards a referring physician by paying too much salary, or a less for space or equipment that rewards a community physician for referrals by charging too little rent. MLH ensures all business arrangements with potential referral sources are in writing and comply with applicable laws and regulations, including the federal Stark Law and Anti-Kickback Statute. To avoid violations, all proposed contracts, financial arrangements, and agreements must be reviewed by legal in accordance with the MLH Contract Management Policy.

Policy Link:

<https://methodisthealth.policystat.com/policy/12557893/latest>

Health Insurance Portability and Accountability Act (HIPAA)

HIPAA is the primary law that governs protecting patient health information. We all have a duty to protect the confidentiality and security of patient information. All uses and disclosures of Protected Health Information (“PHI”) must be made with respect and sensitivity for our patients and in compliance with the law.

- We do not share confidential information with other Associates or others outside the organization unless there is a legitimate Methodist Le Bonheur Healthcare purpose.
- Patient information or PHI is intended to be used for authorized purposes such as treatment, payment, or healthcare operations by authorized individuals.
- We will only view or access the “minimum necessary” protected health information needed to achieve the intended work-related purpose or complete a job task.
- We will not reveal or discuss patient-related information with those not authorized to have access to this private and confidential information.
- We safeguard the privacy of our patients and protect the confidentiality of their health information and personal information from inappropriate use or disclosure, according to laws that govern privacy and medical records.
- We will only release records in accordance with MLH policies.

We never:

- Access a co-worker, neighbor or family member’s medical record out of curiosity or snooping.
- Sell patient information or patient lists to a vendor or attorney.
- Post patient information or photographs/videos on social media.

Complying with Billing and Coding Requirements

Claims for hospital and professional services are subject to several important laws, regulations and payer rules. MLH is committed to documenting, charging, billing and submitting claims for reimbursement accurately and in the manner required by applicable laws, rules, regulations and payer requirements. We have implemented policies, procedures and systems to ensure correct billing. We expect our physicians to provide us with complete and accurate information in a timely manner.

Anyone at MLH responsible for providing patient care services or involved in billing for those services must understand and carefully follow all applicable rules governing documentation, coding and submission of claims for reimbursement. In support of correct billing, we must accurately document in the medical record the services provided. It is important that all individuals who contribute to medical records provide factual information. Improperly billed claims and improperly retained overpayments can result in the imposition of substantial fines and penalties to MLH and in serious consequences for the individuals involved.

Methodist Le Bonheur Healthcare bills only for services that are actually provided and documented, and are medically necessary and appropriately ordered by a physician or other appropriately licensed individual. We do not knowingly cause or present claims for payments which are untrue.

Ensure Billing Integrity:

- Use accurate billing codes that describe the actual items or services provided.
- Respond to billing and coding inquiries in a timely manner and resolve inaccuracies in previously submitted claims that are discovered and confirmed.
- Promptly refund any overpayments found in regular reviews of our records for patient credit balances.
- Return any overpayments received from governmental healthcare programs (such as Medicare or Medicaid) within 60 days of identification.
- Do not routinely waive insurance co-payments or deductibles.

WE WILL:

- Read and abide by the MLH Conflict of Interest Policy
- Not offer, accept or provide gifts or favors (e.g., free meals, entertainment, travel) that might be interpreted as an inducement
- Not use MLH resources and property (including supplies, equipment, facilities, or personnel), information, or position for conducting outside business activities or for personal gain
- Not engage in solicitation of patients and visitors during their stay and visit

WE WILL AVOID:

- Financial or ownership interest in an entity that competes with MLH
- Employment with an entity that competes, contracts with or is a supplier of MLH
- Buying from or making any business decision that involves friends or family

Conflicts of Interest

In our work, we have a duty to avoid situations in which personal interests, activities or relationships create or appear to create a conflict of interest. A conflict of interest may occur whenever an individual or a related party (family member, friend, or business associate) receives a personal benefit from any decision or action taken by the individual on behalf of MLH. Questions could arise whether we are acting for MLH's benefit or for personal gain.

Policy Link:

<https://methodisthealth.policystat.com/policy/12919525/latest>

Maintaining Proper Vendor Relationships

Relationships with external parties are an important aspect of daily business operations. It is MLH policy to select suppliers based on impartial factors such as price, quality, diversity, performance, customer service, patient safety and reputation. We also follow our Conflicts of Interest policy when working with vendors.

The giving or accepting of gifts or entertainment by Vendors/Sales Representatives to Associates at MLH is strictly prohibited. We never accept personal gifts, cash, cash equivalents (gift cards), free meals, loans, services, trips, entertainment, or substantial favors of any kind from any vendor or company seeking to do business with MLH.

MLH expects vendors/sales representatives to respect and abide by the MLH Code of Conduct and applicable organizational policies and procedures.

Policy Link:

<https://methodisthealth.policystat.com/policy/9787433/latest>

Vendor Interaction Tips:

- Read and abide by the MLH Vendor Policy.
- Keep our commitments with business partners. We will adhere to the terms and conditions of contracts with vendors, suppliers, contractors, and others we conduct business with.
- Never accept personal gifts, cash, cash equivalents (gift card), free meals/food, loans, services, trips, entertainment, or substantial favors of any kind from any vendor or company seeking to do business with MLH.
- Immediately forward rebate checks (received from vendors for equipment and supplies purchased by MLH) to the Materials Management Department to be processed. An individual department should never cash or deposit the vendor rebate check.

Organizational Resources

We rely on all Associates to manage MLH resources honestly and efficiently. MLH resources are intended to be utilized for legitimate business purposes only.

Email, Internet and Information Systems

Always use MLH email, internet and information systems responsibly. Use of our systems must follow our information security policies and procedures. For example, we should never share passwords, leave laptops unattended, or download unapproved software. To the extent permitted by law, MLH reserves the right to monitor activity on our resources.

Policy Links:

<https://methodisthealth.policystat.com/policy/13019299/latest>

<https://methodisthealth.policystat.com/policy/10748877/latest>

Confidential and Proprietary Information

As part of your role at MLH, you may have occasion to create, access or maintain confidential and proprietary information. Examples of confidential information are: patient lists, personnel information, vendor pricing, vendor contract terms, research data, intellectual property, financial information and legal records. This information must be protected to prevent an unauthorized disclosure that could put our organization at risk and potentially violate certain laws. Only share confidential or sensitive information with those who have a legitimate and lawful need to know. Confidential and proprietary information belongs to MLH and must remain confidential even after your association with MLH ends.

Social Media/Photography

Social media is a powerful tool that, when used appropriately, can promote individual and public health, as well as our facilities and services. When used inappropriately, it can potentially violate patient privacy or cause harm to the organization. MLH trusts and expects associates to exercise personal responsibility when participating in online social media activity and to consider how their actions might reflect upon MLH.

MLH will obtain written authorization from patients for any photographing, recording or filming for purposes other than treatment, payment or health care operations. In the clinical setting, associates and clinical staff are prohibited from taking photographs, videotaping or recording patients for patient care purposes with a personal unsecured device.

Policy Links:

<https://methodisthealth.policystat.com/policy/11101552/latest>

<https://methodisthealth.policystat.com/policy/11746174/latest>

Examples of Resources:

Physical Property:

- Facilities
- Equipment
- Supplies
- Company Funds

Intangible Assets:

- Confidential Information
- Information Systems
- Company Time
- Intellectual Property

Social Media Guidelines

- Read and abide by the MLH Social Media Policy
- Ensure that you are maintaining the privacy of our patients and their family members
- Ensure that you protect MLH confidential and proprietary information
- Ensure that your use of social media does not conflict with or distract from the performance of your job duties
- Exercise good judgment

Government Investigations

Read and abide by the MLH Investigation Policy.

- We will cooperate with governmental agencies in the event of any governmental investigations or audits.
- Always tell the truth and never destroy, remove or hide documents or electronic data.

If a facility or MLH Associate is contacted at a MLH workplace by an official representative, investigator, or other individual acting on behalf of the government, the Associate should:

- Immediately contact the Chief Compliance Officer and the MLH Legal Department; and
- Ask to see credentials or proper identification, including a business card, before speaking further with the person.

Policy Link: <https://methodisthealth.policystat.com/policy/9639325/latest>

Excluded Persons

MLH does not employ, contract with or conduct business with individuals or entities that have been excluded, suspended, debarred, or have otherwise become ineligible to participate in federally funded health care programs. We perform routine searches of governmental exclusion lists to ensure this does not happen. Additionally, you are required to report to us if you become excluded, suspended, debarred or ineligible to participate in Federal healthcare programs, and if you are under investigation for certain criminal or civil offenses for which you may become excluded.

Policy Link: <https://methodisthealth.policystat.com/policy/9787500/latest>



TEAMWORK

Together we are better.

Treating Others with Respect

At MLH, our Associates and healthcare partners are our most important resource. MLH is committed to creating and maintaining an environment that embraces, values and respects the individual differences and unique contributions among our Associates, Physicians, patients, business partners and the communities we serve.

Consistent with our values as a diverse and inclusive organization, MLH has a comprehensive program of policies, practices and processes for developing and maintaining our faith-based organizational culture.

Anti-Discrimination

MLH is an Equal Opportunity Employer and complies with all applicable federal and state laws prohibiting discrimination in employment. MLH does not discriminate with regard to race, color, religion, sex, national origin, disability, predisposed genetic characteristic, age 40 and over, sexual orientation, gender identity and gender expression.

Anti-Harassment

MLH is committed to providing a safe and collegial work environment in which all Associates are treated with dignity and respect, free from unlawful harassment including violence, intimidation and bullying. MLH will not tolerate harassment including but not limited to sexual harassment of our Associates by anyone (including physicians, vendors and others).

Harassment can take many forms, including harassment or conduct based on race, sex, national origin, religion, physical or mental disability, predisposed genetic characteristic, pregnancy, age, sexual orientation, gender identity, gender expression, or any other legally protected characteristic.

Harassment is prohibited regardless of whether the target of the conduct is offended, or whether he or she considers the conduct unwelcome, and can include conduct that is witnessed or observed by others who are not targeted or even directly impacted by the harassing conduct. Harassment of any kind is strictly prohibited and can even occur outside the workplace and at times not within the Associate's working environment.

Workplace Violence

MLH is committed to providing a safe environment for all patients, visitors, Associates and physicians. MLH will not accept or tolerate any behavior by anyone that could be interpreted as threatening or as an act of violence (including domestic violence) or harm to a fellow Associate, patient, physician or any other individual on MLH premises.

Firearms, illegal weapons, tasers, pepper spray or paraphernalia that have the appearance of weapons (i.e., toy guns, knives, etc.) are prohibited on any property that is owned, leased or under the control of MLH or its subsidiaries.

Policy Link: <https://methodisthealth.policystat.com/policy/12031494/latest>

Drug and Alcohol Use

For the safety of our patients, visitors, Associates and physicians, we are committed to a workplace free of alcohol and unauthorized drugs. Associates, physicians, volunteers and outside contractors are prohibited from reporting to work or being on MLH property with an identifiable level of illegal or unauthorized substances, alcohol or other intoxicants in his/her system.

Associates may use prescription drugs during work time (as prescribed) provided they are 1) prescribed for the Associate in the possession of them and 2) the medication is not one that alters the Associate's ability to reason or function in an acceptable manner.

Any prescription drugs intended for the use or treatment of our patients may be handled or administered only in the authorized course of the Associate's work duties and in accordance with established protocols and procedures.

Violations of this policy will result in corrective action, up to and including discharge.

Policy Link: <https://methodisthealth.policystat.com/policy/10369009/latest>



INNOVATION

We are a learning organization
and embrace new ways to get
better results.

Research and Scientific Integrity

Clinical research is an important part of advancing healthcare for all patients and communities. As a leading institution for patient care and research, Methodist Le Bonheur Healthcare takes our responsibility seriously to conduct clinical research activities that adhere to legal and ethical standards and in accordance with appropriate regulatory bodies. The rights, safety and well-being of subjects who participate in research within Methodist Le Bonheur Healthcare shall be protected. MLH individuals engaged in clinical research activities are responsible for the conducting of research with scientific and ethical integrity and adherence to all applicable state and federal regulations.

Policy Link: <https://methodisthealth.policystat.com/policy/10763346/latest>

Corporate Compliance Department

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