



# Standards of Conduct

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## A Message from Our CEO

Hi Team –

Foundational to our bold vision of Getting Healthcare Right is a values-based, patient-centered, and team member-engaged system culture committed to consistently delivering better care, better health and better value to all our patients and community.

At TriHealth, we are less about what we say about ourselves and more about how we behave and the values-based decisions we make every day in every interaction with every patient, family member and team member we serve. By following our TriHealth values and complying with all applicable laws, government regulations, third party payer requirements and our own polices, we bring our mission to life. And our Corporate Compliance & Privacy Program helps ensure we advance this mission while operating in a complex and highly regulated environment.

This Standards of Conduct document is a key element of our Compliance & Privacy Program. It is a reflection of the values-driven culture of compliance and integrity as well as the professional standards demonstrated by our TriHealth team members, physicians, and contractors. The Standards of Conduct also serves as a valuable guide to help us identify and avoid behavior that can result in regulatory and disciplinary action, as well as serious damage to our reputation.



Fostering a highly compliant, values-driven organization is our shared responsibility. If you know or suspect that our Standards of Conduct, or any law, regulation or policy is not being followed, you have an obligation to report this information. To do so easily and confidentially, simply contact our Compliance & Privacy department directly. As we continue our Journey to Zero Harm and in becoming a High Reliability Organization, team members, physicians and vendors are ALWAYS encouraged to “speak up for safety” in the moment without fear of retribution or retaliation. And as always, we offer an opportunity to anonymously report concerns using our toll-free AlertLine. Every page of this document lists the various ways to report Compliance & Privacy concerns.

On behalf of the TriHealth Board of Trustees and senior leadership team, thank you for your unwavering commitment in upholding the Standards of Conduct and the Compliance & Privacy Program.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark C. Clement", is positioned above the printed name.

Mark C. Clement  
TriHealth President and CEO

## Overview & Purpose

TriHealth is committed to serving our patients, physicians, team members, and our communities in an ethical, legal, and responsible manner. Our goal is to provide all services in full compliance with applicable law and regulations, TriHealth policies, and in a manner consistent with our values. Our Standards of Conduct is intended to ensure that we fulfill this commitment.

TriHealth is a diverse enterprise providing a variety of services in addition to patient care, such as medical education, research, corporate health, and community outreach. We are all responsible for upholding TriHealth’s values and following laws, regulations, and our policies. Team members, physicians, contractors, members of the Board of Trustees and its Committees, and everyone else working or acting on behalf of TriHealth share in this important job. The Standards of Conduct will help guide us in our ethical duty to do what is right.

Report compliance or privacy matters to TriHealth **Corporate Compliance & Privacy**  
513-569-6507 or [Compliance@TriHealth.com](mailto:Compliance@TriHealth.com) or call the 24/7 anonymous **AlertLine** at 1-800-467-0989

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The Standards of Conduct applies across the entire TriHealth enterprise and compliance is mandatory. Failure to comply with the Standards of Conduct, laws, regulations, guidance, or policies can result in serious damage to our reputation and standing in the community; as well as bring criminal and regulatory action against TriHealth and its team members. Violation of the Standards of Conduct will result in corrective action, including disciplinary action up to and including discharge from employment or cessation of relationship with TriHealth.

The Standards of Conduct is the foundation of our policies and procedures which are maintained on TriHealth's intranet site ("[Bridge](#)") and are also available on the internet upon request. Questions about the Standards of Conduct, compliance and/or privacy policies or matters should be directed to the Compliance & Privacy Department (513-569-6507 or [Compliance@TriHealth.com](mailto:Compliance@TriHealth.com)).

## **Mission, Values, and Vision**

### **Our Mission**

The mission of TriHealth is to improve the health status of the people we serve. We pursue our mission by providing a full range of health-related services, including prevention, wellness, and education.

Our service identity is rooted in our Mission and Core Values, which serve as guiding principles in our healing ministry. Each team member, from our caregivers and service/support staff to our corporate and administrative staff, is committed to living these core values in every facet of his or her job.

We strive to be where people want to work, where physicians want to practice, and most importantly, where the community wants to go when they need the best quality, service, safety, and value in health care.

### **Our Values**

- **Respect for All People:** treating all people with the same degree of compassion we would want for ourselves and our families.
- **Stewardship:** choosing to serve the community rather than ourselves by making the best use of our time, treasures, and talents. Stewardship includes our environmental commitment.

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- Service Excellence for all Customers: entrusting people to anticipate customer needs, continuously improving services and consistently exceeding the customer's expectations. Quality of our services is defined by the internal and external customer.
- Response to Community Needs: making decisions to meet the diverse needs of the community while respecting various community cultures and our own values.
- Respect for our Spiritual Heritage: emphasizing the organization's spiritual roots and behaving such that our values are evident in everything we do.
- Valuing Differences: nurturing an environment that values diversity, recognizes differences, encourages personal growth, and enhances the self-worth of each individual.
- Our Values Action Word - S.E.R.V.E.
  - SERVE: Our Mission is to improve the health status of the people we Serve.
  - EXCEL: Excellence in quality, safety, and service.
  - RESPECT: Respect for all people, differences, and spiritual heritage.
  - VALUE: Value our time, treasures, and talents through stewardship.
  - ENGAGE: Engage our people & community needs to improve health.

### **Commitment to Safety, Reliability, & Quality**

TriHealth is committed to safety and reliability. We are all responsible for ensuring safe and healthy care for our patients as well as working conditions for team members and physicians.

Our policies protect team members, physicians and others from potential workplace hazards, and everyone is required to become familiar with and understand how these policies apply to their specific job responsibilities. It is important that serious workplace injury or any situation presenting a danger of injury be reported using TriHealth's incident reporting system and directly to leadership or the Safety department so timely corrective action may be taken to resolve the issue.

We provide our patients with high quality and consistent care to all patients and populations in our community while reducing unwarranted clinical variation. TriHealth providers and facilities deliver the right care at the right time that is appropriately licensed and/or certified. TriHealth does not conduct its necessary business with individuals and entities who are excluded from federal and applicable state funded health care programs.



## **Diversity, Equity, & Inclusion and a Safe and Respectful Work Environment**

TriHealth is comprised of unique individuals who are inspired to create a culture of diverse talents and perspectives that will enable each individual to contribute fully in the pursuit of TriHealth's mission and vision. We believe that by embracing diversity, we can create a more positive, professional environment, provide an enhanced and enriched work experience for our team members and physicians, and promote continuous improvement to providing excellent and compassionate care. We are committed to equal opportunity, maintaining a work environment free of harassment, unlawful discrimination, bullying, violence, and intimidation.

## **Business Integrity**

### **Delivery of Medically Necessary Care with Accurate Documentation and Billing**

TriHealth is committed to the federal health programs and abides by all federal laws and requirements that work to prevent Fraud, Waste, Abuse and False Claims. We provide medically necessary health care that is documented, coded, and billed correctly. TriHealth is committed to correcting intentional or accidental billing errors per TriHealth policy requirements aimed compliance with the False Claims Act. Any suspicion of noncompliance, accidental or otherwise, must be reported to TriHealth leadership and Corporate Compliance & Privacy.

### **Business Records**

TriHealth keeps accurate and complete business records and follows retention and destruction requirements outlined in our records retention policy. We do not destroy records relevant to any ongoing litigation, government investigation or audit until the matter is deemed closed by appropriate parties.

We cooperate with government investigations and accreditation surveys in accordance with our policy, which requires notification of appropriate department and leadership to ensure full cooperation.

We use TriHealth funds appropriately, take care of our supplies and inventories, and only access and use TriHealth supplies, technology and/or campus locations for authorized job-related reasons.



## Gifts

TriHealth earns business by providing exceptional service, quality, and outcomes. TriHealth team members, physicians, and those working on behalf does not offer, accept, or provide gifts, favors, or money that could be seen as an attempt to improperly influence someone.

A gift to a patient must not exceed a retail value of \$15 and no patient may be given more than \$75 worth of gifts a calendar year. Cash or cash equivalent may never be given to a patient. Sometimes, patients, relatives or community members wish to give gifts to TriHealth team members and/or physicians out of gratitude. Their choice and trust in TriHealth as their health care provider is gift enough. Should patients want to extend more, they may donate to TriHealth Foundations (Bethesda, Good Samaritan, and McCullough-Hyde Memorial).

Gifts to physicians must follow all policy requirements and must to be modest and may never include cash or cash equivalents. Before giving something of value to a physician, check with the Corporate Compliance & Privacy department to make sure it is allowed.

## Business Source Events and Gifts

Social or entertainment events hosted by business sources, entities who do or could do business with TriHealth or a related entity, may generally be attended or accepted when they meet all of the following criteria:

- Invitation was not solicited.
- Business source event has legitimate business or educational purpose and is not extravagant.
- Events are infrequent, no more than 3 times annually per business source.
- Gift retail value does not exceed \$100.

## Community Responsibility

TriHealth has deep spiritual roots as a not-for-profit entity that is exempt from federal taxation pursuant to Section 501(c)(3) and is also exempt from certain state and local taxes including, but not limited to, Ohio income tax, sales tax, and real estate taxes. All employees, consultants, and agents who do business with TriHealth must do so in a manner that is consistent with TriHealth's tax-exempt status. On behalf of TriHealth, we will:

- Not contribute TriHealth funds or time to a candidate, political action committee, or political party.

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- Only participate in the political process as responsible citizens in our personal capacity and not on TriHealth's time or with TriHealth resources.
- Make sure we do not imply that we represent TriHealth or its interests in the political process or make public statements on behalf of TriHealth unless authorized to do so by virtue of our position, such as a Public Affairs representative.
- Clarify when speaking on public issues that the comments or statements we make are our own, and not those of TriHealth.

### **Conflicts of Interest**

When we are acting on behalf of TriHealth, we do so in a manner consistent with its charitable purpose and do not place private or personal interests over those of TriHealth. Team Members must remain free from external influence when performing assigned duties, avoiding private gain, financial or otherwise. If you believe that yours or your family members' personal interest may affect the ability to act with good faith, loyalty and in the best interest of TriHealth, refer to the policy and report the matter to your leader, Compliance & Privacy or the Legal Department.

**Abuse**

Excessive or improper use, or to use something in a manner contrary to natural or legal rules.

**Deficit Reduction Act**

Contains provisions intended to bolster Medicaid fraud and abuse enforcement, including the requirement to notify whistleblowers of their rights.

**False Claims Act**

Prohibits submitting requests for compensation or reimbursement to the Government via Fraud, Waste, or Abuse ("False Claims") or causing others to submit False Claims. Protects those reporting potential False Claims ("whistleblowers").

**Foreign Corrupt Practices Act**

Prohibits individuals and businesses from bribing foreign government officials in order to obtain or retain business, imposes record keeping and internal control requirements, and prohibits individuals and companies from knowingly falsifying books and records.

**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.

**Physician Self-Referral Law, a.k.a. "Stark" Law**

Prohibits a physician from referring business to an entity in which the physician or their immediate family member(s) has a "financial relationship." It also prohibits the entity from billing Medicare, other payers, or the individual for "designated health services" performed based on a prohibited referral.



## **Patient Rights**

TriHealth is dedicated to protecting patient rights, including the right to emergency treatment, the right to medical privacy and access to medical records, and the right to receive healthcare free from discrimination.

### **Health Insurance Portability and Accountability Act of 1996 (HIPAA)**

TriHealth protects patient privacy in accordance with HIPAA and Ohio law.

- We access, use and/or disclose medical information, "Protected Health Information" (PHI), only as permitted by law or under valid authorization.
- We use encryption, password protection, and multifactor authentication to safeguard our data.
- We protect papers, electronic devices, and electronic communications containing confidential information, including PHI, and dispose of them in accordance with policy.
- We ensure patients' privacy rights are honored and that they have access to their records and in the desired form and format desired by the patient in accordance with policy.

### **Emergency Medical Treatment and Labor Act (EMTALA)**

TriHealth protects patients' rights to emergency treatment in accordance with EMTALA. We do not turn patients away when they are seeking emergency care. We provide everyone presenting to the emergency department a medical screening exam regardless of ability to pay and do not delay this exam to ask for payment or insurance information. We provide necessary stabilizing treatment within our capability and appropriate transfer when necessary or upon patient request.

### **Americans with Disabilities and Section 1557/Patient Protection and Affordable Care Acts**

TriHealth does not discriminate against patients based on:

- Disability
- Race, ethnicity, color, culture, national origin
- Language
- Religion
- Age
- Sex, pregnancy, sexual orientation, gender identity
- Socioeconomic status, method of payment

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TriHealth provides qualified interpreting services at no cost to patients who are deaf, hard of hearing, or have limited English proficiency to enable meaningful communication between patients, families, and providers.

## **Duty to Report & Commitment to Non-Retaliation**

We are a highly reliable organization and have many safety and reliability tools, to include a commitment to non-retaliation. As our non-retaliation policy outlines, we protect those who report concerns they believe to be true. If you think or know there is a law, policy, or Standards of Conduct violation, it is your duty to report it. Failure to do so could result in corrective action, including disciplinary action up to and including discharge from employment or cessation of relationship with TriHealth.

### **Ways to Report Concerns**

- Talk with your supervisor or any TriHealth leader or Human Resources (HR) Team Member
- Contact Compliance & Privacy Department:
  - Email: [Compliance@TriHealth.com](mailto:Compliance@TriHealth.com)
  - Phone: 513-569-6507
- Report anonymously by calling the AlertLine 24/7 at 1-800-467-0989

Human Resources-related issues (e.g., team member disagreements, working relationships, concerns about fairness and coworker respect) should be reported using Human Resources problem-solving procedures.



### **Candice Kramer, CHC, CHPC**

VP Chief Compliance, Privacy & Audit Officer

Phone: 513-569-6507

Email: [Compliance@TriHealth.com](mailto:Compliance@TriHealth.com)

Anonymous AlertLine: 800-467-0989

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