

Standards of Conduct

Dignity Health's Guide to
Compliance and Ethics

Dignity
Collaboration
Justice
Stewardship
Excellence



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DIGNITY HEALTH'S MISSION

Dignity Health and our Sponsoring congregations are committed to furthering the healing ministry of Jesus.

We dedicate our resources to:

- Delivering compassionate, high-quality, affordable health services;
- Serving and advocating for our sisters and brothers who are poor and disenfranchised; and
- Partnering with others in the community to improve the quality of life.

Our Values

Dignity Health is committed to providing high-quality, affordable health care to the communities we serve.

Above all else we value:

- **Dignity** - Respecting the inherent value and worth of each person.
- **Collaboration** - Working together with people who support common values and vision to achieve shared goals.
- **Justice** - Advocating for social change and acting in ways that promote respect for all persons and demonstrate compassion for our sisters and brothers who are powerless.
- **Stewardship** - Cultivating the resources entrusted to us to promote healing and wholeness.
- **Excellence** - Exceeding expectations through teamwork and innovation.

A MESSAGE



From Lloyd H. Dean, Dignity Health President /CEO

Dear Dignity Health Colleague:

Dignity Health has a long and proud history of living our values. Maintaining a vibrant and ethical culture is an obligation that each one of us shares. This booklet, your personal copy of *The Standards of Conduct - Dignity Health's Guide to Compliance and Ethics*, is one important tool for helping each of us fulfill this obligation.

It is imperative that we always hold ourselves accountable for the integrity of the decisions we make and the actions we take. While our conscience can often be our guide, the laws and rules that apply to the delivery of healthcare are often complex and confusing. For that reason, this booklet was designed to serve as a guide as you seek to address the frequently difficult ethical, professional and legal challenges which are part of your position.

You are the individual responsible to ensure we fulfill our commitments. Whether you prepare rooms between patients, perform their diagnostic tests, offer suggestions for the reduction of costs, or render direct patient care, your actions and decisions bring our integrity program to life.

Please join me in support of the values and principles that are critical to achieving our mission. If you are aware of or believe violations of the Standards are occurring, I urge you to discuss the matter with your immediate supervisor. Alternatively, you may contact your Human Resources Department if it is a human resource issue or the Facility Compliance Liaison for other issues. If you are not comfortable discussing the matter in your facility or business unit, you may call a System Compliance Director, the Dignity Health Compliance Officer, the Dignity Health Hotline at 1-800-938-0031 or via the web at <https://dignityhealth.alertline.com>. I assure you all calls and e-mails are handled with discretion and you can remain anonymous.

I sincerely appreciate your commitment to Dignity Health and ask that you carefully review this booklet and seek assistance if you have questions.

Sincerely,

A handwritten signature in black ink that reads "Lloyd H. Dean". The signature is written in a cursive, flowing style.

Lloyd H. Dean
President /CEO
Dignity Health

DEFINITIONS

The following definitions are used in this booklet:

“Dignity Health” includes each of its subsidiaries, operating or business units, facilities and affiliated medical staffs and medical group practices.

“Standards” means the Dignity Health Standards of Conduct.

“Dignity Health Compliance Officer” is the Dignity Health employee who oversees the Dignity Health Compliance function and Dignity Health Integrity Program.

“Dignity Health Integrity Program”, “Integrity Program”, “Program” refer to Dignity Health activities designed to promote ethical conduct and adherence to the laws, including:

- The Standards of Conduct
- A variety of Dignity Health compliance policies and procedures
- Employee education
- Auditing and monitoring programs and activities
- Communications mechanism including (the “Hotline”)
- Investigation
- Follow-up
- Corrective and/or disciplinary action, if necessary.

“Employee(s)” means all individuals employed, or otherwise retained by Dignity Health either full-time or part-time, including per diem, temporary, casual, contract labor and volunteers.

“Facility Compliance Liaison (FCL)” is a Dignity Health employee whose job assignment includes the responsibility and accountability for communicating, monitoring and evaluating implementation of the Dignity Health Integrity Program in the local business unit or facility.

“System Compliance Director” is a Dignity Health employee who reports directly to the Dignity Health Corporate Compliance Officer. They assist in communicating the Dignity Health Integrity Program and monitor compliance along with other corporate compliance staff throughout Dignity Health.

Background

Over the past few years, there has been growing concern over whether the Medicare system would have sufficient funds for future beneficiaries. Additionally, because of the tremendous amount of money Medicare was paying health care providers across the nation, the government was compelled to more closely scrutinize whether all these payments were proper. This included efforts to identify health care providers engaged in fraudulent and abusive practices against the Medicare system.

Unfortunately, the government's initial investigations revealed that some health care providers were engaging in unethical and illegal activity. In addition, the government found many instances where, because of ignorance, neglect or other priorities, providers were not always following Medicare rules. As a result, providers have been subjected to a variety of sanctions, including fines, penalties, and exclusion from participating in the Medicare program.

Compliance with the complicated laws that apply to government funded health care programs has been the primary focus of our efforts. However, Dignity Health is committed to compliance with all applicable laws and the Standards of Conduct are intended to provide employees with meaningful guidance regarding their legal and ethical responsibilities in many business contexts.

While Dignity Health believes that a program focused on compliance with all applicable laws will help detect and/or decrease any potential fraud and abuse, we also believe it is insufficient to cover the equally important concept of how we conduct our business. Therefore, Dignity Health has voluntarily developed and implemented the Dignity Health Integrity Program, which not only addresses legal compliance, but ethical conduct as well.



Benefits of the Dignity Health Integrity Program

- Helps Dignity Health fulfill its fundamental care-giving mission to patients and the community.
- Assists Dignity Health in identifying weaknesses in our systems, processes and management.
- Demonstrates to employees and the community Dignity Health's commitment to honest and ethical conduct in the workplace.
- Provides a more accurate assessment of any potential fraud and abuse issues.
- Identifies ethical conduct, and may prevent criminal conduct.
- Helps improve quality of patient care.
- Provides a system that encourages employees to report potential problems.
- Provides a mechanism to thoroughly investigate reported concerns/violations.
- Creates a centralized source for distributing information concerning health care law, regulations, and other related topics.
- Helps employees understand their roles and responsibilities, and provides guidance for employees who may have questions.

Elements of Dignity Health Integrity Program

- Written standards (including Standards of Conduct) and policies and procedures that promote Dignity Health commitment to integrity and that address specific areas of legal vulnerability for Dignity Health, such as, Fraud and Abuse Enforcement and Prevention Policy, Medicare/Medicaid Compliance Policy, Response Procedure Dignity Health Hotline Call Policy and Intranet/ Internet Security Usage Policy.
- A Corporate Compliance Officer and Facility Compliance Liaisons who have direct reporting relationships to Service Area Leaders and the governing body.
- Compliance initiatives and procedures designed to enhance employee education and promote compliance in those areas that pose the greatest risks to Dignity Health.

- Reporting systems that allow employees to raise questions, through usual chain-of-command, Dignity Health Compliance Officer, System Compliance Directors, Facility Compliance Liaison and/or the Dignity Health Hotline, where employees can report known or suspected violations of the Standards, Dignity Health policy or applicable laws or regulations without fear of retaliation.
- A system to monitor our compliance with the laws and Dignity Health policy and to assist in the reduction of identified problem areas.
- Prompt correction of compliance problems within Dignity Health.
- The Dignity Health Integrity Program does not replace other policies, such as those governing employee grievance procedures, employee benefits, accounting, auditing, etc. Rather, the policies of the Dignity Health Integrity Program should be used along with these other policies.

Furthermore, the Dignity Health Integrity Program does not affect the “employment at will” status of those employees who are subject to such a policy, nor does it supersede the provisions of any collective bargaining agreement or create any contractual obligation between Dignity Health and any employee.

Employee Responsibilities

Fulfillment of Dignity Health’s commitment to the Standards is dependent upon the commitment of each Dignity Health employee. Dignity Health does not exist separately from its employees and can only function through its employees. Each member of the Dignity Health Board of Directors and each community board is committed to the Dignity Health Standards of Conduct and the Integrity Program. It is expected that every Dignity Health employee will adhere to the Standards of Conduct and the Integrity Program as well as:

- Take responsibility for his/her own actions;
- Know and comply with applicable laws and rules, including applicable Federal health care program requirements, the Dignity Health Standards of Conduct and Dignity Health policies and procedures as they apply to his/her particular job responsibilities;
- Seek guidance as provided in the Dignity Health Standards of Conduct and/or policies when in doubt about his/her responsibilities;
- Refrain from involvement in illegal, unethical or other improper acts;

- Promptly report any potential or suspected violation of the Dignity Health Standards of Conduct, Dignity Health policy or applicable laws or regulations; and,
- When requested, assist Dignity Health personnel and authorized outside personnel in investigating all allegations of violations.

Dignity Health provides employees with policies, training and other aids to help fulfill their responsibilities under the Standards. Supplemental materials and training are provided throughout Dignity Health where appropriate.

Additional Management Responsibilities

Management at every level has the added responsibility to ensure that our compliance efforts are properly and effectively implemented. Compliance is not the responsibility of the compliance officer, the Compliance function or the Facility Compliance Liaison – it is the responsibility of every one of us, particularly management. While the Facility Compliance Liaison, Compliance Director or Compliance Officer are valued resources, it is ultimately the role of each of us to ensure we fulfill our obligations as managers and ensure compliance with laws, rules and policies. In carrying out these responsibilities, managers will:

- Use care in screening potential employees and act professionally and lawfully in supervising existing employees;
- Take reasonable steps to ensure that employees are familiar with the Dignity Health Integrity Program;
- Adequately train employees to comply with the requirements contained in the Standards of Conduct and comply with applicable laws and regulations, policies and/or compliance directives;
- Maintain a work environment in which employees feel free to ask questions and/or report concerns about potential or suspected issues without fear of retaliation;
- Conduct periodic reviews to provide reasonable assurances of adherence to the Dignity Health Integrity Program;
- Promptly report any potential or suspected violation of the Standards of Conduct, Dignity Health policy or applicable laws and regulations; and,
- Set a proper example for employees to follow.

“Example is not the main thing in influencing others. It is the only thing.”
Albert Schweitzer

Dignity Health Compliance Officer/System Compliance Directors/ Facility Compliance Liaisons

To assist management, Dignity Health has a Compliance Officer, as well as System Compliance Directors and Facility Compliance Liaisons. They will assist in communicating and implementing the Dignity Health Integrity Program and will help monitor compliance throughout Dignity Health.

The Dignity Health Compliance Officer is a Dignity Health employee who reports directly to the Dignity Health Board of Directors Audit and Compliance Committee. System Compliance Directors are Dignity Health employees who report to the Dignity Health Compliance Officer. Facility Compliance Liaisons are Dignity Health employees who report to the Dignity Health Compliance Officer, the System Compliance Director, and the local business unit executive.

Your Facility Compliance Liaison is available to answer questions about the Standards or the Dignity Health Integrity Program, and also receive and investigate reports of potential or suspected violations.

Reporting Potential/Suspected Violations

It is the responsibility of every employee to report suspected violations of these Standards, applicable laws and regulations, and Dignity Health policy. Reporting these concerns helps Dignity Health promptly determine whether conduct is proper and correct problems quickly. If you have questions or want to report a potential or suspected violation, you are encouraged to first speak with your immediate supervisor.

If you do not feel you can candidly discuss the issue or matter with your supervisor, you may call your Human Resources representative for matters relating to your employment or employee benefits or the Facility Compliance Liaison for other concerns. If you are not comfortable speaking to your HR representative or Facility Compliance Liaison, you may call or contact the System Compliance Director, the Dignity Health Compliance Officer, or the Dignity Health Hotline at 1-800-938-0031. Calls to the Hotline are not traced and anonymous unless you choose to identify yourself.

Employees who violate the Standards are subject to discipline, up to and including dismissal.

Retaliation against any employee, who, in good faith, reports potential or suspected violations, is unlawful and will not be tolerated.

The False Claims Act - Federal and State Laws Protecting Whistleblowers

The law. The federal False Claims Act (31 USC 3729-33) 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” means that the person or organization:

- knows the record or claims is false, or
- seeks payment while ignoring whether or not the record or claim is false, or
- seeks payment recklessly without caring whether or not the record or claim is false.

Under certain circumstances, an inaccurate Medicare, MediCal, Medicaid, VA, Federal Employee Health Plan or Workers’ Compensation claim could become a false claim. Examples of possible false claims include someone knowingly billing Medicare for services that were not provided, or for services that were not ordered by a physician, or for services that were provided at sub-standard quality.

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. There are also state laws that allow a similar lawsuit in state court if a false claim is filed with the state for payment, such as under Medicaid or workers’ compensation. Penalties are severe for violating the federal False Claims Act. The penalty can be up to three times the value of the false claim, plus fines from \$5,500 - \$11,000 per claim.

DIGNITY HEALTH INTEGRITY PROGRAM: AN OVERVIEW

Whistleblower Protections. The federal False Claims Act protects anyone who files a false claim lawsuit from being fired, demoted, threatened or harassed by their employer for filing the suit. An employee who was harmed by their employer for filing a false claims lawsuit may file a lawsuit against their employer in Federal Court. If 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.

Dignity Health Policy. Dignity Health is committed to honest and ethical conduct. Dignity Health's Corporate Integrity Program includes policies and procedures for detecting and preventing fraud, waste, and abuse - including false claims. Additionally, the Program includes a corporate compliance officer and facility compliance liaisons; employee education; reporting systems; monitoring and auditing systems; and prompt correction of identified problems. Key among the Dignity Health Integrity Program policies are the following:

- Dignity Health Standards of Conduct - The Standards set forth Dignity Health's expectation about proper job-related conduct. These expectations include respecting and promoting patient's rights; representing Dignity Health honestly and accurately; maintaining and communicating honest and accurate records or information; complying with all laws and regulations; and promptly reporting suspected violations. Retaliation against any employee, who in good faith, reports potential or suspected violations will not be tolerated.
- 70.1.005 Fraud and Abuse Enforcement and Prevention - This policy sets forth the procedures that are used by Dignity Health to respond to



reports by employees or others that a Dignity Health entity or employee may be engaging in activity which may be contrary to applicable laws or regulations. This policy requires timely investigation, corrective action where necessary, repayment to the government of any payment received to which Dignity Health was not entitled, and employee discipline where necessary.

- 70.1.006 Response Procedures - Dignity Health Hotline Calls - This policy requires Dignity Health to promptly respond to calls placed to the Dignity Health hotline. The policy sets forth the procedures for following-up on these calls.
- 70.2.002 Medical Necessity - It is the policy of Dignity Health to bill the Medicare program only for services that are reasonable and necessary for the diagnosis or treatment of illness or injury.
- 70.2.004 Medicare/Medicaid Compliance - It is the policy of Dignity Health to consistently and fully comply with all laws and regulations pertaining to the delivery of and billing for services which apply to Dignity Health on account of its participation in Medicare, Medicaid and other government programs.
- Other Compliance Policies - Additionally, Dignity Health maintains policies related to specific high risk areas, such as coding and documentation, clinics and physician practices, physician transactions, HIPAA, etc.

These policies exist to detect and prevent fraud, waste, and abuse. All compliance policies may be located in the Dignity Health Administrative Policy Manual available through the Dignity Health On-Line Document Imaging (CODI) system.



DIGNITY HEALTH STANDARDS OF CONDUCT

Dignity Health recognizes that integrity is integral to all facets of its business dealings, and that certain business standards can be universally applied. While ethical business behavior is second nature to most people, situations sometimes arise in which the proper course of conduct may not be clear.

The following Standards have been developed to demonstrate Dignity Health's commitment to honest and ethical conduct, and to provide guidance to employees facing uncertain situations. The Standards address five categories of issues that are critical to the success of Dignity Health: **Patient Rights, Ethical Conduct, Fiscal Responsibility**, adherence to applicable **Laws and Regulations** and **Social and Environmental Responsibility**. The standards are not intended to be an exhaustive list of issues facing Dignity Health, but instead, are those that are frequently encountered.

“Integrity is doing the right thing, even if nobody is watching.”

Jim Stovall



I. PATIENT RIGHTS

Dignity Health is firmly committed to fostering the innate dignity of the human person, and to the belief that such dignity deserves respect and protection regardless of the nature of the person's health condition or social status. In fostering individual dignity, Dignity Health acknowledges and promotes the patient's right to make free and informed decisions regarding medical treatment and procedures, and no person should be obliged to submit to a procedure that the person has judged not to provide a reasonable hope of benefit without imposing excessive risks and burdens on the patient or excessive expense to patient and family. Listed below are standards to guide all who minister to patients in Dignity Health facilities.

Appropriate Care and Treatment

- Patients are treated at all times with care, concern and respect. Patients are entitled to prompt and courteous responses to their requests and to their needs for treatment or service.
- Medically necessary care is provided with the patient's informed consent. Care is provided in an efficient manner, consistent with our obligation to maintain quality. Patients are entitled to disclosure of charges.
- Patients are informed of their right to self-determination. This right respects the competent adult patient's right to participate in and make his/her own health care decisions after receiving his/her physician's complete disclosure of the nature and consequences of proposed health care, including significant benefits, risks and alternatives. A patient has the right to accept medical care or to refuse treatment, and to be informed of the medical consequences of such refusal.



DIGNITY HEALTH STANDARDS OF CONDUCT

- Medicare beneficiaries are given a variety of written notices upon admission or at discharge, including notices that care is subject to a Quality Improvement Organization (QIO) and Utilization Committee review. Also, additional patient rights apply for Medicare patients in long-term care facilities and home health agencies, including a requirement that patients be informed of their rights in a language they understand.
- If a patient has been declared incompetent by a court, or is assessed by his/her primary care physician to lack the ability to understand the nature and consequences of proposed health care, including significant benefits, risks and alternatives, the patient's agent holding power of attorney for healthcare, surrogate decision maker, conservator/guardian, next of kin or other legally authorized responsible person has an obligation to act in the best interests of the patient to the extent permitted by law.
- At discharge, Dignity Health hospitals provide patients with information regarding the availability of any post-hospital services they may require, consistent with applicable laws, assuring patient choice is appropriately maintained at all times.
- A patient's special needs are considered in planning for optimal care by providing special programs in response to such needs. For example, a pain management policy may serve as a guide for optimizing pain control of each patient served.

Patient privacy and confidentiality of care is respected at all times in accordance with Dignity Health policy and the Health Insurance Portability and Accountability Act (HIPAA) requirements.



Emergency Services

Consistent with our commitment, to the poor and underserved, any person regardless of his/her ability to pay, is provided an appropriate medical screening examination within the capability of each Dignity Health hospital to determine whether an emergency medical condition exists or, for pregnant women, active labor exists and, if so, provide appropriate stabilizing treatment and/or appropriate transfer.

- Dignity Health hospitals provide an appropriate medical screening examination and any stabilizing treatment required by persons with emergency medical conditions, including psychiatric medical conditions, prior to transferring them to other medical centers for treatment. Practices that fail to conform to this policy, commonly referred to as “dumping,” are prohibited under both federal and state laws, and carry severe penalties for Dignity Health, its employees and medical staff.
- Employees must comply with Dignity Health policies on screening, stabilization and transfer of patients. These policies are available in the emergency and labor and delivery departments, as well as other departments
- At a minimum, a person presenting to a Dignity Health hospital is entitled to a medical screening examination in accordance with medical staff policies to determine whether he or she has an emergency medical condition or, in the case of a pregnant woman, is in active labor, irrespective of ability to pay. If it is determined that a patient has an emergency medical condition, the patient must receive a further medical evaluation and such treatment as may be required to stabilize the medical condition, within the capabilities of the staff and facilities available, or the patient must be transferred in a medically appropriate



II. ETHICAL CONDUCT

Dignity Health is committed to the **highest standards of business ethics and integrity**. Employees must represent Dignity Health accurately and honestly, deal fairly with its competitors, customers and vendors, and refrain from any activity intended to defraud anyone of money, property or services. Dignity Health also expects employees, supervisors, vendors, volunteers and medical staff members will treat one another with dignity, respect and courtesy.

Honest Communication

Employees are expected to communicate with candor and honesty in performing their job responsibilities and in dealing with Dignity Health's attorneys and auditors. Employees are not to make false or misleading statements to any patient, person or entity doing business with Dignity Health.

Misappropriation of Proprietary Information

Employees must not steal or misappropriate confidential or proprietary information belonging to another person or entity. They also must not use any customer list, price list, contract, publication, document, computer program, information or product in violation of a third party's interest in such product. Employees must not copy documents or computer programs in violation of applicable copyright laws or licensing agreements. Employees must not use confidential business information improperly obtained from competitors or which is otherwise in violation of a covenant not to compete, prior employment agreement, or other contracts.

Confidential Information

Employees must not disclose confidential patient or business related information to unauthorized persons.

Employees must protect a patient's personal privacy and preserve the confidentiality of a patient's medical treatment program, including the patient's medical records, in accordance with all applicable laws and Dignity Health policies.

DIGNITY HEALTH STANDARDS OF CONDUCT

Employees possess and have access to a broad variety of confidential, sensitive and proprietary information. Much of the information regarding Dignity Health, its hospitals, patients, and employees is private and must be kept confidential. If you have any questions whether information falls within these categories, seek guidance from your manager, Facility Privacy Official, human resources representative, Facility Compliance Liaison, System Compliance Directors or call the Dignity Health Hotline at 1-800-938-0031.

The privacy principles of Dignity Health require that all Protected Health Information (PHI), as defined in the rules and regulations of the Administrative Simplification Section of the Health Insurance Portability and Accountability Act of 1996 (HIPAA), be maintained and secured in a manner required by the HIPAA and other applicable federal and state laws and Dignity Health policies. These principles shall also extend to the protection of business information proprietary to Dignity Health. Dignity Health has developed and implemented specific broad policies and procedures to uniformly support these privacy principles.

- **Right to Privacy:** Dignity Health Patients have certain rights regarding privacy and the confidentiality of their PHI. The Dignity Health Facilities will limit the use and access to PHI as required by law and Dignity Health policy. Employees and other persons subject to Dignity Health and facility policies may only access PHI as necessary to perform their job function, consistent with applicable laws and Dignity Health policy.
- **Patient Rights:** Dignity Health Patients have certain rights related to their PHI, and all facilities and employees shall comply with Dignity Health policies and procedures.
- **Provision of Notice:** As required by law, notice of how Dignity Health uses and discloses PHI shall be available to Dignity Health patients.
- **Privacy Officer:** The Dignity Health Board of Directors has appointed a privacy official known as Chief Privacy and Data Security Administrator. This Dignity Health employee is required to identify necessary personnel to carry out this function and approve Dignity Health system-wide policies and procedures to implement these privacy principles.

DIGNITY HEALTH STANDARDS OF CONDUCT

- **Education:** Dignity Health entities are committed to providing education to their workforce on these privacy principles.

Employees will also acquire knowledge and information relating to trade secrets, commercially sensitive information and financial information about Dignity Health. In addition, during work, employees may create or develop systems, procedures, software, processes, etc. These are all confidential, the property of Dignity Health and may not be used, except Dignity Health's business, or disclosed to any outside party, including contractors, suppliers, competitors or the media, without prior written authorization from senior management, after consultation with the Dignity Health Compliance Department. Examples of confidential business information include:

- Business programs or projections
- Customer lists
- A merger or acquisition proposal agreement
- Litigation materials or information prepared in anticipation of litigation
- Physician, hospital and patient contracts or agreements
- Unusual or sensitive management developments.

Confidential information should only be accessed by or given to other employees who have a legitimate need to know the information within the scope of their duties.

Employees must not disclose to Dignity Health confidential information of another company learned under circumstances where the other company has a reasonable expectation that the information would be kept confidential.



Conflicts of Interest

Dignity Health is committed to exercising responsible stewardship of natural, human and financial resources, and avoiding conflicts of interest and/or the appearance of conflicts. Employees may not use their positions for personal gain or advantage, or to assist others, including family members, in profiting in any way at the expense of Dignity Health. Employees may not serve as an expert witness in any case without the written permission of Dignity Health's General Counsel.

The Dignity Health Conflict of Interest Policies and Procedures provide **additional** guidance in this area and apply to directors, officers, senior managers and other key employees. To ensure compliance with this policy, these individuals are required to submit a Conflict of Interest Disclosure Statement annually. All other employees are required to disclose to their immediate supervisors, or to the Dignity Health Compliance Officer, any real or potential conflicts of interest prior to making any decision or taking any action that is or may be affected by the conflict. Supervisors may consult with the Dignity Health Compliance Officer for assistance in resolving such conflicts.

Gifts, Gratuities, Entertainment and Honoraria

No gift of money should ever be accepted by an employee from any company or firm that transacts business with Dignity Health. Similarly, Dignity Health prohibits its employees from offering or giving money, services or other things of value with the expectation of influencing the judgment or decision-making process of any referral source, referral recipient, supplier, contractor, bank, physician, third party payor or government official.

An employee must not accept or give gifts or entertainment that have the appearance of being given to obtain business from referral sources, referral recipients, suppliers of goods or services, contractors, banks, physicians, third party payors or government agencies. Exceptions are items of minimal value (generally, less than \$300 on an annual aggregate basis), ordinary business meals and modest business entertainment so long as such activities are not excessive and do not create an appearance of undue influence.

However, gifts and/or entertainment should NOT be provided to, or accepted from, a government official, agent or subcontractor, including a Medicare fiscal intermediary, without prior written approval of the Dignity Health Compliance Officer.

DIGNITY HEALTH STANDARDS OF CONDUCT

An employee may accept payments or honoraria for speaking engagements or other activity requiring substantial time and effort provided that such honoraria is disclosed to the employee's supervisor or manager. Speaker's fees or honoraria that exceed \$1,000 in annual aggregate must be paid to Dignity Health directly or forwarded to Dignity Health unless the employee is entitled under the terms of a written employment contract to retain honoraria in excess of \$1,000.

Outside Business Activities

Holding, directly or indirectly, a material ownership or financial interest, or employment or management position in any outside business entity from which Dignity Health makes or receives patient referrals or purchases goods or services is considered a conflict of interest. This includes any material financial interest held by a family member such as a parent, spouse, child, sibling or an in-law of the employee or a person with whom the employee has a significant personal relationship. A "significant personal relationship" means a relationship the existence of which has the potential to influence, or would appear to influence, and employee's decision-making or performance of his or her duties for Dignity Health. A material ownership interest does not include ownership of publicly traded securities that are acquired on the same basis as made available to the general public and that amount to less than a 1% ownership interest.

Without prior written approval of a manager or supervisor, employees must not engage in outside business activities during working hours. Employees must not use Dignity Health equipment, supplies or information in connection with their outside business activities.



Loans

Dignity Health shall not make any loan of money or property to any employee, or guarantee the obligations of any employee, except as specifically permitted by the Conflicts of Interest Policy and Procedure. Employees may borrow from banks, insurance companies or other recognized institutions that transact business with Dignity Health only if on the same terms and conditions as similar loans offered to the general public.

Contracting and Referrals

Business relations with contractors or vendors and referral relationships with other health care providers must not be influenced by individual financial or personal relationships and must comply with Dignity Health policies and procedures. Employees must disclose personal relationships and business activities with contractors, vendors or persons employed by such entities as well as referral sources or referral recipients that may be construed by an impartial observer as influencing the employee's performance of duties.

Services for Competitors/Suppliers

Employees must not perform work or render services for any vendor or supplier outside of the normal course of their employment with Dignity Health without prior notice to their manager or supervisor. Service on vendor sponsored advisory councils or similar groups is permitted only with the approval of the employee's supervisor and the SAL or an EMT member as applicable. In addition, all travel and lodging costs must be paid by the facility, not the vendor, and all Dignity Health policies, including policies related to gifts and honoraria, must be followed.

Workshops, Seminars and Training Sessions

Dignity Health recognizes the value of supplier sponsored education programs principally to provide employees with important, job-related information. Employees may attend such local, supplier-sponsored workshops, seminars and training sessions. Supplier-funded out-of-town seminars, workshops and training sessions are permitted only with prior approval of an employee's manager or supervisor.

DIGNITY HEALTH STANDARDS OF CONDUCT

Gifts from Patients

Employees are prohibited from soliciting money, personal gratuities or gifts and from accepting money, personal gratuities and gifts of more than a nominal value from patients or their families, unless such activity is conducted through and part of Dignity Health or facility fund development activities. Gifts of perishable items, such as flowers or cookies, given as tokens of appreciation by patients and their families may be accepted and should be shared in the work unit. No patient or family should be expected or encouraged to provide gifts or gratuities in exchange for care.

Business Inducements

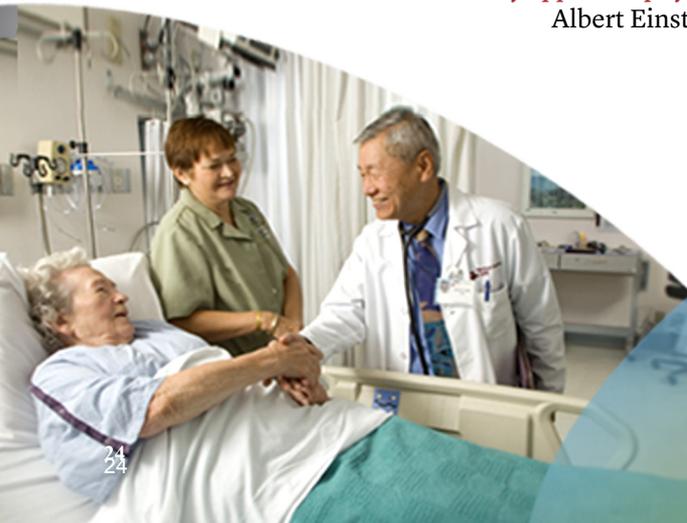
Commissions, rebates, discounts and allowances are customary and acceptable business practices, if they are approved by Dignity Health's management and do not constitute illegal or unethical payments. Such payments must be reasonable in value, competitively justified, properly documented and made to the Dignity Health entity to whom the original agreement or invoice was made or issued. These payments should not be made to individual employees or agents of Dignity Health entities. Any rebate, discount, allowance or similar benefit must be properly recognized and reported under applicable cost reporting laws and rules.

Respect and Integrity

Employees, medical staff members and contractors are expected to conduct themselves in a manner that reflects integrity, shows respect and concern for others, protects Dignity Health's interests and meets Dignity Health's obligations to its patients, customers, clients, employees and others with whom it interacts.

“Relativity applies to physics, not ethics.”

Albert Einstein



III. FISCAL RESPONSIBILITY

Dignity Health at all times maintains financial statements that properly represent its financial position, results of operations and cash flow in conformity with applicable law and Generally Accepted Accounting Principles (GAAP), consistently and fairly applied.

Financial Accounting and Business Records

Dignity Health maintains honest and accurate financial records.

Dignity Health's books and records must not contain any false, misleading or deceptive information or entries.

Financial reports must fairly and consistently reflect Dignity Health's performance and accurately disclose the results of operations. As appropriate, they must also comply with GAAP and other applicable rules and guidelines and provide a sufficient platform on which to complete cost reports and requests for payment for services provided to beneficiaries of federal and state health care programs such as Medicare, Medicaid/Medical and Tricare/CHAMPUS. Each employee has a personal responsibility to ensure that every document and entry is complete and accurate, and that requests for reimbursement or payments are supported by receipts, purchase orders or other documentation as required by Dignity Health financial policies.

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Internal Controls

An internal control is any process or procedure designed to ensure that an activity is performed safely, accurately, and consistent with applicable laws. These processes are designed and intended to protect Dignity Health and its employees. These controls exist in virtually every aspect of our work and all Dignity Health employees share responsibility for maintaining and complying with required internal controls. In carrying out their documentation, evaluation, financial reporting and record keeping responsibilities, employees must provide complete and accurate documentation consistent with Dignity Health standards and requirements. Moreover, in fulfilling their financial reporting obligations, employees must

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disclose all material facts related to a matter being reported, including any material fact that is necessary to ensure the report is not false or misleading. Employees must cooperate in all audits, and may not try to influence, coerce, manipulate, or mislead any person or entity engaged to perform the audit with the intent of affecting the outcome of the audit.

Financial Reporting

All financial reports, accounting records, research reports, expense accounts, time sheets and other documents must accurately and clearly represent the relevant facts or true nature of a transaction.

Personal Use of Corporate Assets

Dignity Health's assets shall not be used for personal purposes unless approved in advance by the employee's manager, or unless the use is considered minimal. Employees are prohibited from unauthorized use or taking of Dignity Health's equipment, supplies, materials or services. Employees are required to obtain approval of their manager before engaging in any activity on company time that will result in payment to the employee by a person or entity other than Dignity Health or to use Dignity Health's equipment, supplies, materials or services for personal or other purposes unrelated to their Dignity Health work.

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IV. LAWS AND REGULATIONS

Dignity Health complies with all laws and regulations affecting its business.

Taxes

As a nonprofit entity, Dignity Health has a legal and ethical obligation to comply with applicable laws, to engage in activities to further its charitable purpose, and to ensure that its resources are used to further the public good rather than the private or personal interests of any individual.

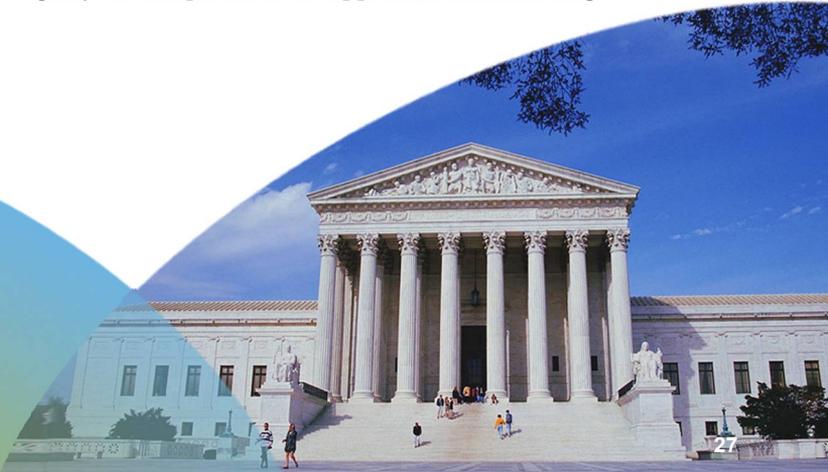
Consequently, Dignity Health and its employees must avoid compensation arrangements in excess of fair market value, utilize Dignity Health's facilities and assets for exempt purposes, accurately report payments to appropriate taxing authorities, and file all tax and information returns according to applicable laws.

Legal Compliance

Dignity Health conducts its business in accordance with the spirit and letter of all applicable laws and regulations.

- Employees are expected to have a practical, working knowledge of the laws and regulations affecting their job responsibilities.
- If employees have questions about the application of the law to their work activities, they may contact the Dignity Health Legal Department or the Dignity Health Compliance Department.
- Dignity Health provides training and supplemental materials to help employees know and comply with the laws and the policies and procedures relating to their jobs.

Employees are required to bring to management's attention suspected violations of Dignity Health policies and applicable laws and regulations.



Private Benefits

As a tax-exempt entity, Dignity Health avoids payments in excess of fair market value. Employees and physicians must comply with the various Internal Revenue Service rules and regulations that apply to transactions between tax-exempt entities and other private parties. These rules deal with issues commonly referred to as “inurement” and “private benefit.” Violation of these rules could result in the loss of tax-exempt status for Dignity Health or the imposition of sanctions against Dignity Health, Dignity Health management and the physician(s), including those penalties imposed under the Federal Intermediate Sanctions Law. Because these transactions involve complicated tax issues, they should be reviewed and approved in writing in advance by the Dignity Health Legal Department.

Fraud and Abuse & Self-Referral Statutes

Dignity Health and its facilities will maintain honest and accurate records concerning the provision of health care services, submit accurate claims, and never offer, pay, solicit, or receive any money, gifts or services in return for the referral of patients or to induce the purchase of items or services.

Violation of federal and state laws concerning fraud and abuse, false claims and self-referral can result in significant criminal and civil penalties for Dignity Health and its employees, including imprisonment, fines, penalties and damages. Employees must be vigilant in avoiding any conduct that could violate or even appear to violate these laws.

Prohibited activities include, but are not limited to, the following:

- Billing for supplies or services not delivered;
- Misrepresenting services actually provided. Such misrepresentation includes, but is not limited, to assigning a code for a more complicated procedure than actually performed (upcoding), or by dividing a procedure or service typically billed as one procedure into multiple parts in order to increase reimbursement (unbundling);
- Duplicate billing for services rendered;
- Falsely certifying that services were medically necessary;
- Falsely certifying that an individual meets the Medicare requirements for home health (or any other) services;

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- Seeking to collect amounts exceeding the co-payment and deductible from a Medicare or Medicaid beneficiary who has assigned his or her rights to benefits;
- Permitting an employee, provider or supplier who has been excluded from Federal health care programs to prescribe, provide or oversee the delivery of goods or services to the beneficiaries of such programs;
- Offering or transferring money, gifts, or other items of value to a patient or prospective patient to influence him or her to order or receive services or items from Dignity Health.

The fraud and abuse laws prohibit knowingly and willfully offering, paying, soliciting or receiving any money gifts, kickbacks, bribes, rebates or any other type of value, remuneration or services in return for the referral of patients or to induce the purchase, lease, or ordering of any item, good or service for which payment may be made by the federal or state government. Examples of violations include:

- Payment by Dignity Health of an incentive each time a patient is referred to Dignity Health;
- Provision or receipt by Dignity Health of free or significantly discounted billing, nursing care, rent or other staff services;
- Provision or receipt by Dignity Health of free training in management techniques, coding and laboratory techniques;
- Payment by Dignity Health for services in excess of their fair market value;
- Forgiveness of indebtedness to Dignity Health absent a charitable or risk management purpose; and,
- Preferential treatment of or by Dignity Health in any form to obtain business.

Dignity Health's Legal and Compliance Departments have developed a comprehensive program to ensure compliance with the federal and state anti-kickback and anti-referral laws pertaining to physician arrangements. Consistent with Dignity Health's strategic direction, the intent of the program is to provide standardization of physician contracting and consistency of legal interpretation, with the ultimate goal of providing an efficient framework to contract with physicians in compliance with the laws.

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The Dignity Health Policies and Procedures governing physician contracts and other payments to physicians are found in the Physician Financial Arrangements Policy 70.5.001. These policies govern, among others, the following arrangements: medical directorships and other administrative services, professional services, emergency call coverage, managed care payments, facility and equipment leases, loans and lines of credit, physician recruitment, and other miscellaneous transactions.

Lobbying and Political Contributions

Dignity Health does not use corporate resources for political purposes promoting or benefiting any candidate for office or to reward government officials, nor shall Dignity Health employees engage in activities that jeopardize our tax-exempt status.

- Federal law prohibits a corporation from making contributions or expenditures in connection with a federal election, including in-kind contributions, such as the use of corporate facilities or any other donation of goods or services. As a tax-exempt organization, Dignity Health is also prohibited from engaging in any activity that is intended to support or oppose any candidate for public office.
- Dignity Health employment or compensation decisions may not be conditioned on a requirement that an employee make a political contribution

All Dignity Health contacts and transactions with governmental representatives must be conducted honestly and ethically. Any attempt to influence the decision-making process of a government representative by an improper offer of any benefit is absolutely prohibited. Any request or demand by any government representative for any improper benefit should be immediately reported to the Dignity Health Compliance Department.

Employees may personally participate in and contribute to political organizations or campaigns as long as it is on the employee's own time, financed exclusively with the employee's own funds and resources, and done outside of any Dignity Health facility.

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Where its experience may be helpful, Dignity Health may publicly offer recommendations concerning legislation or regulations being considered. In addition, it may analyze and take public positions on issues that have a relationship to the operations of Dignity Health when Dignity Health's experience contributes to the understanding of such issues or otherwise further Dignity Health's charitable mission.

Antitrust and Trade Regulations

Dignity Health avoids activities that illegally reduce or eliminate competition, control prices, allocate markets or exclude competitors.

- The purpose of the antitrust and trade regulation laws is to protect the public, Dignity Health and other companies from unfair trade practices. These laws promote competition and preserve the free enterprise system. Employees are expected to strictly comply with all applicable federal and state antitrust laws and regulations.
- Because antitrust matters can only be analyzed on a very fact-specific basis, the Dignity Health Legal Department must be consulted in advance on each occasion where collective activity or decision making will occur that may involve antitrust issues.

Antitrust Rules to Live By

- Do not engage in price fixing, bid rigging or allocation of customers or markets.
- Price fixing is an agreement between organizations about the prices one or both will charge others for goods or services.
- Bid rigging is an agreement between organizations about who will bid, or both.
- Customer allocation is an agreement between organizations or individuals to divide customers, patients, or other business among themselves.
- Do not discuss with any competitor: prices, terms or conditions of sale; where Dignity Health intends to sell or bid; to whom Dignity Health intends to sell or bid; or whether, or at what price, Dignity Health intends to sell or bid.
- If any representative of a competitor attempts to discuss any or these subjects with you, terminate the conversation immediately and report it to your manager.

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- Do not engage in activities such as bribery, stealing, improperly using competitor trade secrets, deceptive or similar unfair practices, or intimidating or threatening customers or suppliers.

Employment Standards

- Dignity Health is an equal opportunity employer. Dignity Health is dedicated to ensuring that all decisions regarding terms and conditions of employment, including recruitment, hiring, training, promotions, transfers, discipline, layoff, recall and termination are in accordance with Dignity Health's principles of non-discrimination.
- Dignity Health complies with all federal, state and local laws prohibiting discrimination.
- Dignity Health prohibits harassment, including sexual harassment. Sexual harassment includes sexual advances, requests for sexual favors or any sexually offensive verbal, visual or physical conduct, when such conduct creates an intimidating, hostile or offensive work environment. Sexual harassment will not be tolerated. Any alleged incident will be promptly investigated in accordance with each facility's Human Resources policies.
- Dignity Health encourages a diverse and inclusive work environment respect and value each employee's unique contributions to our organization, and seek to ensure that any real or artificial barriers in any aspect of employment are identified and corrected.



Physician Relations

Dignity Health maintains proper and legal working relationships with physicians. To that end, Dignity Health has developed a Physician Financial Arrangements Policy (Policy 70.5.001) which provides an efficient framework to transact business with physicians in compliance with the laws.

- Dignity Health and its facilities are committed to maintaining positive working relationships with affiliated physicians.
- Dignity Health and its facilities are committed to provide a medical staff privileging process using uniformly applied professional criteria in a fair, prompt and reasonable manner, without discrimination on the basis of race, color, national origin, ancestry, sex, pregnancy, childbirth or related medical condition, marital status, religion, creed, physical/mental disability, medical condition, age, gender identity, sexual orientation or any other protected category as defined by law.
- All agreements involving payments or other compensation between Dignity Health or Dignity Health facilities and physicians are to be in writing and approved in advance by the Dignity Health Legal Department. In accordance with the Dignity Health Physician Financial Arrangement Policy, 70.5.001, the following requirements must be met:
 - The written agreement is prepared by the Dignity Health Legal Department and signed by both the hospital and physician before the arrangement commences.
 - The agreement identifies the correct legal name and tax payer I.D. number of the physician or medical group and payments may only be made to the specified party to the agreement.
 - Payment is fixed for at least one year.
 - Services to be provided and paid for and/or the leased premises or equipment, are clearly described in the agreement.
 - The agreement demonstrates that payment is not in any way based on the value or volume of referrals.
 - The agreement is prospective only.

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- Payment for physician services must have adequate supporting documentation to demonstrate that the services were performed.
- Any renewal of an agreement that changes the compensation must be prospective.

The above list is a summary reference source only. Dignity Health's Physician Financial Arrangements Policy (70.5.001) will be used in evaluating the adequacy of individual physician arrangements. Additional guidance is incorporated in the Physician Financial Arrangements Policy related to managed care arrangements, physician recruitment, and other matters.

Health and Safety

Dignity Health facilities maintain a safe and healthy working environment.

- Employees shall conduct themselves in a manner that minimizes potential health and safety hazards and notify their supervisors promptly of any actual or potential unsafe working conditions or practices.
- Employees properly generate, store and dispose of medical, chemical and other waste in accordance with applicable laws and Dignity Health's environmental policies designed to protect human health, the environment and surrounding community.
- Employees who are authorized to operate incinerators, sterilizers and underground storage tanks (containing fuels for emergency generators) are adequately trained to operate such devices pursuant to all permits, regulations and applicable procedures.



V. Social and Environmental Responsibility

Dignity Health seeks to act as a responsible corporate citizen in each community where it operates and in the global community.

Social Responsibility

- Dignity Health supports and respects the protection of internationally proclaimed human rights, upholds employees' freedom of association, recognizes the right to collective bargaining, promotes the elimination of forced or compulsory labor and child labor and seeks to do business with companies that do the same.
- Dignity Health uses its resources and influences to promote the common good.

Environmental Responsibility

- Dignity Health operates in a manner that maximizes patient and employee health and safety and minimizes environmental impacts.
- Dignity Health takes a precautionary approach to environmental challenges (seeking alternatives when reasonable scientific studies indicate an ingredient or product could pose significant human health or environmental risks).
- Dignity Health undertakes initiatives to promote greater environmental responsibility.
- Dignity Health encourages the development and diffusion of environmentally friendly technologies.

INQUIRIES, REPORTING VIOLATIONS, INVESTIGATIONS

Dignity Health has established a Hotline at **1-800-938-0031** for use by employees to ask questions or report potential or suspected violations of the Standards, Dignity Health policy, or applicable laws and regulations when employees are not comfortable communicating these matters within their usual organizational structures. The Hotline is accessible 24 hours per day, seven days a week. All reports will be taken seriously, reviewed and investigated promptly, result in appropriate corrective action and, to the extent possible, be treated in a confidential manner. An employee has the option to make a Hotline report anonymously. In that event, employees should understand that in a follow-up review or investigation, the reporter's identity may be learned as a natural consequence of the review or investigation. Retaliation against any employee who, in good faith, reports potential or suspected violations is unlawful and will not be tolerated.

DIGNITY HEALTH STANDARDS OF CONDUCT

Reviews and investigations of potential or suspected violations of the Standards, Dignity Health policy or applicable laws and regulations will be conducted under the direction of the Dignity Health Compliance function and/or Facility Compliance Liaison, Human Resources or Dignity Health Legal Counsel.

It is Dignity Health's policy to cooperate in all governmental audits and investigations and for employees to do so as well, subject to guidelines set forth in the Standards of Conduct and Dignity Health policies.

CONCLUSION

The Standards set forth Dignity Health's expectations about proper job-related conduct. However, the Standards do not address every difficult situation that an employee may encounter in the workplace. While Dignity Health policies are intended to help employees recognize, understand and fulfill their responsibilities, employees are expected to take the initiative and ask questions if they are unsure how the laws or Dignity Health policies apply to a situation.

DIGNITY HEALTH HOTLINE

If you prefer to contact a neutral third party or to remain anonymous, the Hotline and web alert line are accessible 24 hours a day, every day of the week. All calls are treated in a confidential manner.

Dignity Health Hotline **1-800-938-0031**

Or via the web alert line at : <https://dignityhealth.alertline.com>



Acknowledgement

I acknowledge that I have received the Dignity Health Standards of conduct and understand that it represents mandatory policies of the organization.

Signature

Position

Printed Name

Date

Facility





Employee Hotline
1-800-938-0031