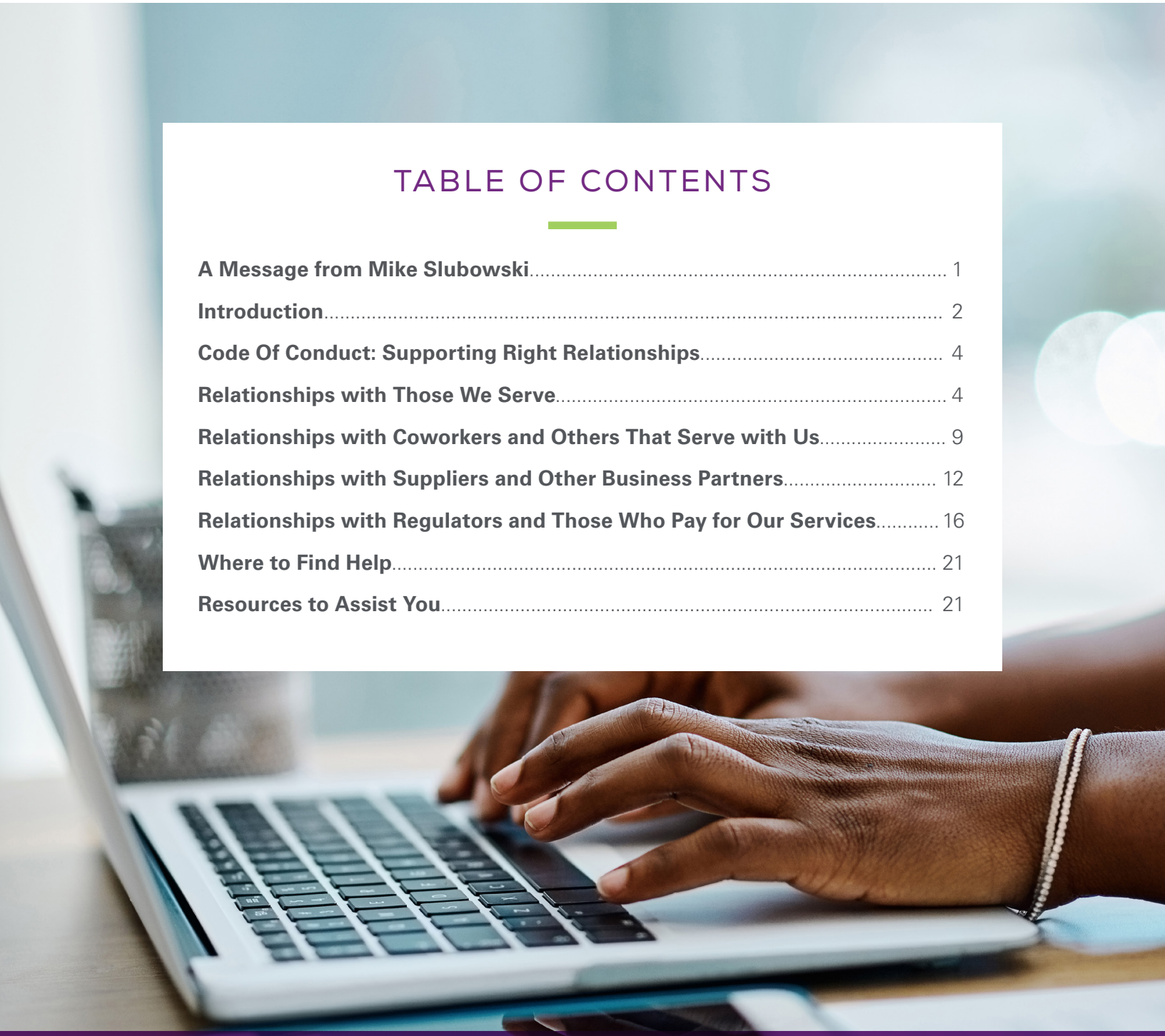
TRINITY HEALTH

Code of Conduct

Trinity Health

9/30/2025



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OUR MISSION

We, Trinity Health, serve together in the spirit of the Gospel as a compassionate and transforming healing presence within our communities.

OUR CORE VALUES

Reverence

Commitment to Those Experiencing Poverty

Safety

Justice

Stewardship

Integrity

OUR VISION

As a mission-driven innovative health organization, we will become the national leader in improving the health of our communities and each person we serve. We will be the most trusted health partner for life.

Dear Trinity Health Colleagues and Service Provider:

Our Mission calls us to serve together in the spirit of the Gospel as a compassionate and transforming healing presence in our communities. Guided by our Core Values, we create trusting relationships with colleagues, patients, physicians, service partners and our communities as we care for the whole person – body, mind, and spirit.

Our health care ministry began over 160 years ago through the dedication of our founding religious congregations. We have a long, rich history of providing excellent service and compassionate care. Those we serve place enormous trust in us. To earn and keep this trust we need to make every effort to avoid even the appearance of illegal or unethical conduct.

Trinity Health has an Integrity and Compliance Program that guides us in understanding and following laws, regulations, professional standards, and ethical commitments. This Code of Conduct is an important resource to help us meet these obligations.

The Code of Conduct describes expected behaviors and addresses more common issues and questions you may encounter in your work. It includes resource information to assist you when you have questions or need further assistance. The Code also explains your duty to speak up and report, without fear of retaliation, any matters you believe may be a violation.

Each of us is personally responsible for living our Trinity Health Core Values, which require compliance with the law as well as acting with integrity. We all have an active role in making honesty, transparency, and ethical behavior a part of our culture.

Thank you for your dedication and commitment to this very important effort.

Michael A. Slubowski

Michael A. Slubowski
President and CEO
Trinity Health

Introduction

Responsibilities of All Who Serve in Trinity Health[1]

This Code of Conduct outlines responsibilities expected at Trinity Health. It provides guidance on behavior expectations. By following the Code of Conduct, we can contribute to achieving Trinity Health's Mission.

The Code of Conduct applies to all:

- Trinity Health organizations
- Colleagues
- Volunteers
- Medical staff members
- Suppliers
- Independent contractors
- Consultants
- Other service providers

We all have an important role in supporting our Code of Conduct. We must:

- Behave in an ethical manner.
- Review and follow the Code of Conduct.
- Ask questions and seek guidance when needed. See *Resources to Assist You* on Page 21 for a listing of resources available.
- Speak up and report concerns about actions or behaviors that may conflict with the Code of Conduct. See *Resources to Assist You* on Page 21 for more information.
- Participate in periodic training programs to further your Code of Conduct understanding, and how it applies to your Trinity Health role.

Nothing in this Code of Conduct or the policies that support the Code is intended to prevent any of us from engaging in or declining to engage in lawful conduct protected by the National Labor Relations Board.

Leader Responsibilities

Trinity Health leaders must set the example and serve as a role model for our Code of Conduct. Leaders also serve an important role when receiving and responding to questions and concerns. They are expected to respond with proper urgency and transparency. Leaders should reach out for guidance and assistance when needed. See *Resources to Assist You* on Page 21 for more information.

Leaders in Trinity Health must:

- Serve as a role model supporting our Mission and Core Values.
- Conduct their work with high ethical standards.
- Promote a culture of trust, open communication, and respect.
- Lead their teams in knowing and applying the Code of Conduct.
- Encourage questions and issues and concern reporting.
- Respond timely and appropriately when matters are brought to their attention.
- Comply with Trinity Health's non-retaliation policies.

1 Throughout this document, references to Trinity Health refer to the System Office and all ministries and subsidiaries.

Code of Conduct Violations

Our Mission and Values are extremely important to Trinity Health. Following this Code of Conduct supports us in making good decisions every day.

The Code of Conduct standards are mandatory and must be followed. We are expected to use common sense and good judgment when completing Trinity Health work activities. And we are responsible for our behaviors and actions.

Non-compliance with this Code or other Trinity Health policies will be investigated. Colleagues and Service Providers who violate the Code may be subject to disciplinary measures, including warnings, suspension or possible termination of employment, hospital privileges and business relationships. The discipline action taken will depend on the violation's nature, seriousness, and frequency.

The following are examples of behaviors and conduct that can result in disciplinary actions:

- Knowingly authorizing or participating in a violation of law and regulations.
- Refusing to provide information or failing to report violations.
- Intentionally falsifying business record documentation.
- Retaliating against individuals who report issues and concerns in good faith.
- Deliberately filing false or frivolous reports of violations.
- Actions that are discriminatory or rise to the level of harassment.
- Reckless actions or behaviors that threaten the privacy and security of personal health and other confidential business information.
- Leaders who fail to appropriately understand and monitor processes in their area of responsibility to assure compliance with law, regulation, policy, or the Code of Conduct.

Code Of Conduct: Supporting Right Relationships

Maintaining relationships is essential to fulfilling Trinity Health's Mission.

Virtually everything we do in Trinity Health is dependent on a relationship with:

- Patients, residents, family members and our communities;
- Co-workers and others who serve with us;
- Suppliers and other service providers;
- Government regulators; and
- Government payers, commercial insurers and others that pay for the services we deliver.

Our Core Value of Reverence calls us to honor the sacredness and dignity of every person.

Successful, long-term relationships are built on trust. Acting with integrity, being honest, and following all laws and regulations are behaviors and actions that build and maintain trust. Our Core Value of ***Integrity- we are faithful to who we say we are*** - provides clear guidance for how we carry out Trinity Health's Mission.

Relationships with Those We Serve

Trinity Health strives to be a transforming healing presence in our communities. Our Core Value of Reverence reminds us to honor the sacredness and dignity of every person. Patients, residents, their family members and loved ones, and others who entrust their care to us are our priority. We are all expected to:

- Deliver people-centered, quality services with compassion, dignity, and respect.
- Commit to safety for every person, every time.
- Speak up when there is a quality or safety issue and participate in our TogetherSafe program.
- Support health equity and deliver services consistent with Trinity Health's Non-Discrimination Policy.
- Maintain a positive and courteous customer service orientation.
- Conduct our work with the highest levels of ethical and professional conduct.
- Do not engage in romantic or sexual interactions with patients during the patient's treatment. Such interactions detract from the goals of the clinical relationship and may exploit the vulnerability of the patient, compromise your ability to make objective judgments about the patient's health care, and ultimately be detrimental to the patient's well-being.
- Speak professionally.
- Respond to requests for information or assistance in a timely and supportive manner.
- Provide comfort for our patients and residents, including prompt response to their needs.
- Discuss available treatment options openly with patients, residents, or their families and involve them in care decisions.
- Create and maintain complete, timely and accurate medical records.Protect the privacy and confidentiality of all personal health information.
- Clearly explain the outcome of any treatment or procedure to patients, residents, or their designees, especially when outcomes differ significantly from expected results.
- Respect patient or resident advance directives.
- Address ethical conflicts that may arise in patient or resident care, including end-of-life issues.
- Provide care that is consistent with the Ethical and Religious Directives for Catholic Health Care Services.

Quality of Care and Patient Safety

Safety is an important Trinity Health value. We are committed to providing compassionate, high-quality care that is safe, effective and efficient. We do everything we can to make sure the care we provide is safe. And we design the systems we use with safety first in mind.

Trinity Health is committed to a Just Culture by creating and sustaining a culture of safety. Trinity Health supports an open, fair and just culture by:

- proactively managing risks and behavior choices.
- designing safe systems.
- responding to adverse events in a fair and consistent manner.
- through open discussion, learning about risks and safety expectations.

We are all expected to report safety issues, incidents and "near misses" so they can be addressed timely through changes to systems and processes without fear or blame. Concerns about the safety or quality of care can be reported internally or directly to The Joint Commission. See *Resources to Assist You* on Page 21. Trinity Health does not take disciplinary or punitive action against anyone making a safety or quality of care report in good faith. This includes reports made to The Joint Commission.

Medically Necessary and Appropriate Care

No matter what our role or where we work at Trinity Health, all of us serve our patients and families. It's our common purpose. We treat all patients and others in our care with respect and dignity. We provide care that is both necessary and appropriate. We assist patients and others in making informed care decisions and we respect and honor those choices.

We are committed to keeping patients and families at the center of all we do. We also support the health and wellness of our communities through education, outreach and programs.

Protecting Personal Health Information (PHI)

We collect personal health information (PHI) from patients, residents, members and others in our care. This information might include current and past medical conditions, medications, and family histories. We are strongly committed to maintaining the confidentiality of personal and protected health information. PHI is collected in many ways - paper and electronic records, films and digital images, and even in verbal discussions. All PHI should be protected and treated confidentially. This supports our Core Value of Reverence and compliance with federal and state data protection laws.

Be sure you:

- Access, review and use PHI only as necessary to perform your job.
- Safeguard PHI (electronic or paper) and do not leave it unattended or available to others.
- Be aware and do not discuss PHI in public areas e.g., cafeterias, restrooms, or elevators.
- Store PHI only on Trinity Health approved laptops or tablets.
- Only release PHI to others or remove PHI from your facility when you have authorization from your immediate leader.
- Never discuss or post PHI on any social media site such as Facebook or Twitter whether using those sites at work or at home.
- Immediately notify your leader or the Privacy Center of Expertise if you believe PHI has been lost, stolen or accessed inappropriately.

Trinity Health has implemented specific policies and procedures to protect PHI privacy and security. Consult your organization's policies and procedures for more information.

Gifts From or To Patients and Residents

We do not request personal gifts from patients, residents, or their family members. The receipt of such gifts is subject to Trinity Health policy. Occasional perishable gifts, like a fruit basket, given to a department may be accepted. Patients who want to express their appreciation with a gift of money (including but not limited to gift cards) should be referred to your organization's fundraising department. Only foundation or fundraising department colleagues can solicit gifts from patients and their families.

Trinity Health can give free or discounted items or services to patients or residents only in limited situations. Any gifts or other items of value provided to Medicare or Medicaid beneficiaries may not exceed $15 per item with $75 per year maximum. Always discuss with your leader or consult your organization's policies before giving any gifts to a Medicare or Medicaid patient or resident.

In some cases, Trinity Health may provide patients with items and services that support preventive care or advance a patient's clinical goal. For example, items that support a treatment or medication plan or for chronic disease management may be allowed. Programs to provide these types of patient items must be approved by Trinity Health senior management with compliance and legal advice from Trinity Health's Integrity and Compliance Office and Legal Counsel.

Emergency Medical Treatment and Active Labor Act (EMTALA)

Trinity Health hospitals with a dedicated emergency department follow the Emergency Medical Treatment and Active Labor Act. EMTALA requires medical screening exams and stabilization care for individuals who come to the emergency department.

This care must be provided before asking questions about the person's ability to pay for services. Trinity Health is committed to providing emergency medical care when we have the capacity and capability. We follow EMTALA. We do not delay medical screening or necessary stabilizing treatment when a patient is in an emergency or in labor. We do not admit, discharge, or transfer patients with emergency medical conditions simply based on their ability to pay or any other discriminatory factor.

Ethical and Religious Directives (ERDs) for Catholic Health Care Services

The ERDs provide official church guidance and teachings on issues central to Trinity Health as a Catholic health care ministry. Colleagues, medical staff and others working in Trinity Health are required to follow the ERDs. Consult your organization's Mission Leader if you have questions regarding how the ERDs apply to your work.

Questions & Answers

Q What should I do if I see that a patient is not being treated with proper respect and courtesy?

A All colleagues are expected to provide care to patients with compassion, dignity, and respect. First, act right away if the patient is at risk of harm. Then discuss what you saw with your direct leader. If your leader can't or doesn't help, contact a higher-level manager in your unit. You can also contact one of the resources listed on on Page 21.

Q What should I do if I know that a medical error has occurred? Should I tell the resident or the resident's family?

A First, report the medical error using your organization's safety event reporting system (see Page 21). Trinity Health supports timely and compassionate disclosure of medical errors. This discussion should include thoughtful communication and coordination with all caregivers. Follow your organization's safety event reporting processes so the resident and family communication is handled properly.

Q A patient told me he doesn't want to receive aggressive treatment. He wants to be made comfortable and be allowed to die. My patient doesn't think we are listening to him. What should I do?

A People-centered care is listening to the patient and considering their wants - even if the decision conflicts with your own values. You should advise the clinical team of the patient's wishes. The clinical team can work with the patient and their family on the best ways to honor his wishes, for example, providing palliative care services. Patients and residents should be presented with appropriate options so they can make informed decisions. Please contact your organization's Mission Leader or ethics committee with questions or concerns.

Q I work in a hospital and have access to the patient registration system. Recently my friend was seen in the emergency room and later admitted to the hospital. I'm concerned and would like to check the patient registration system to see how she's doing or at least locate which room she's in so I can visit her. Is that okay?

A Since you are not involved in your friend's care, you do not have a business reason to access her medical information or location. You may only access this type of information when you need it to do your job. Trinity Health has monitoring systems in place to review colleague system access privileges use. Improper use of access privileges is a violation and could include discipline steps up to termination. It is important to respect our patients' privacy. Our patients have the right not to share their health status with others. It is not appropriate to call or visit patients if you become aware of their admission only through your job role in your ministry.

Q My doctor uses a patient portal where I can look up information, like lab results, in my medical records. Why can't I access my own health information directly through the electronic health record where I work?

A All patients are encouraged to use the patient portal to review their medical information and partner with clinicians involved in their care. Colleagues and others given access to Trinity Health's electronic medical record systems are restricted and should only access information needed to do their job. Accessing your own medical records in Trinity Health information systems is a policy violation. The Privacy Center of Expertise monitors access and use of medical records systems. Improper use of access privileges is a violation and could include discipline steps.

Q I am a nurse and one of the patients on my floor has asked that her same-sex life partner be included in her discharge planning meeting. This meeting is typically only attended by family members. How should I respond?

A Since the patient has asked that her partner be recognized as a member of her family for discharge planning purposes, you should invite the patient's partner to attend. We support patients, residents, their family members and loved ones in receiving compassionate care that respects their dignity, diversity and specific wishes, when possible.

Relationships with Coworkers and Others That Serve with Us

The delivery of high-quality, safe and compassionate care requires effective teamwork. Studies note a positive relationship between the workplace environment and the quality and safety of care delivered. Trust and respect are important behaviors to support effective work environments. We are all expected to:

- Treat others with honesty and dignity.
- Maintain a positive and courteous customer service orientation.
- Speak professionally to colleagues and others.
- Take actions to support cooperation and trust.
- Respond to requests for information or assistance timely.
- Communicate with others clearly, openly, and honestly.
- Provide and accept appropriate feedback.
- If possible, attempt to address differences you may have with colleagues directly.
- Respect the diversity of others and follow Trinity Health's Nondiscrimination and Public Accommodation Policy.
- Respect personal boundaries, refrain from inappropriate physical contact and report any workplace harassment, intimidation, or violence of any kind.
- Promptly report any serious workplace injury or any situation that could present a potential health and safety hazard.
- Protect the confidentiality of colleague health information, social security numbers, medical information, and banking information.
- Perform your duties and responsibilities free from the influence of drugs or alcohol.
- Protect the confidentiality of all medical peer review information.

Harassment and Workplace Violence

Trinity Health does not tolerate behaviors that undermine a culture of safety. Colleagues can expect to work in an environment free of harassment and disruptive behavior. Behavior that is not tolerated, includes but is not limited to the following:

- unwelcomed comments, remarks, gestures, or physical contact.
- offensive, degrading or humiliating jokes, slurs, or comments (explicit or suggestive).
- the display or circulation (including email or the internet) of offensive, derogatory or sexually explicit pictures or other materials.
- verbal or physical abuse or threats.

Workplace violence is any act or threat of physical violence, intimidation, or other disruptive behavior that impacts work related activities. It may be intentional or unintentional. It may affect and involve colleagues, patients, residents, physicians, contractors, suppliers, and visitors. Colleagues who see or experience harassment or workplace violence should immediately report the incident. See *Resources to Assist You* on Page 21.

Workplace Safety

Trinity Health is committed to a safe work environment. Each Trinity Health organization has developed policies to protect workplace health and safety. These policies comply with applicable government regulations. You should be familiar with and understand how these policies apply to your specific job duties. Seek advice if you have a question or concern. See *Resources to Assist You* on Page 21.

Inclusion and Belonging

Rooted in our Mission and Core Values, we honor the dignity of every person and recognize the unique perspectives, experiences, and talents each colleague brings. By finding common ground and embracing our differences, we grow stronger together and deliver more compassionate, person-centered care. Trinity Health is committed to providing an inclusive work environment where everyone is treated with fairness, dignity and respect. Trinity Health is an equal opportunity employer and prohibits discrimination against any individual with regard to race, color, religion, sex (including sexual orientation and gender identity), pregnancy (including childbirth, lactation and related medical conditions), national origin, ancestry, age, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed service member status, or any other status protected by applicable local, state and federal laws and regulations.

Consistent with applicable law, Trinity Health will provide a reasonable accommodation for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an Employee, unless undue hardship or a direct threat to the health or safety of the individual or others would result. Trinity Health will also provide a reasonable accommodation to an otherwise qualified applicant or an Employee for known physical or mental limitations related to pregnancy, childbirth, lactation, or related medical conditions, unless undue hardship or a direct threat to the health or safety of the individual or others would result. Also, consistent with applicable law, Trinity Health will provide a reasonable accommodation for an individual's sincerely held religious beliefs, observances, and practices unless doing so would pose an undue hardship.

Controlled Substances

Many Trinity Health colleagues have access to prescription drugs, controlled substances and other medical supplies as part of their work duties. These substances may be governed by laws that strictly limit their use to minimize potential risks to both patients and health care workers. Unauthorized access, use, or diversion (e.g., theft) of controlled substances is prohibited. Immediately report to your leader or a higher-level manager any potential issues or concerns you have about controlled substances security or diversion.

Questions & Answers

Q I overheard a colleague making jokes about people of certain ethnic backgrounds. It made me feel uncomfortable. What should I do?

A All of us must respect others. Colleagues cannot make jokes based on ethnic or discriminatory characteristics. Even if no harm was intended this behavior can contribute to an uncomfortable environment and possibly harassment. You should discuss this matter with your leader or contact your organization's Human Resources department. You can also contact the Health Equity and Human Impact Department.

Q My leader told me I must start work an hour earlier on scheduled workdays because we need coverage in the department. Can she do that? I've worked the same schedule of hours for five years.

A Yes. Your leader can change your work schedule to meet the department's operating needs. If you are unable to comply with your new work schedule, discuss the matter with your leader or Human Resources.

Q A male colleague has been very "friendly" with several female coworkers in my department. There's a lot of hugging and touching, even when other people are in the room. I don't think this is right even if the female coworkers involved don't seem to mind. What should I do?

A You should discuss the situation with your leader. If you are comfortable, you could also discuss your feelings directly with the male colleague. He may not be aware that his behavior makes you or others feel uneasy. If you remain concerned, contact a higher-level manager or leader, Human Resources, or the Integrity and Compliance Line. This situation will be handled the same if it is a female colleague that initiates touching with male colleagues or if both parties are of the same gender.

Q One of my coworkers returned from a break and appears to be under the influence of alcohol or drugs. How should I respond?

A First, if you work in a clinical area, act immediately if patients or residents are at risk of harm. Then notify your leader, a higher-level manager or Human Resources immediately and report the situation. There may be a medical condition causing your colleague's behavior rather than alcohol or drugs, but your leader or a higher-level manager will need to evaluate the situation.

Q I saw a physician yell at a colleague in front of a patient. I was very bothered by the physician's behavior and feel terrible for the colleague. Is there anything I can do?

A Trinity Health is committed to a safe and welcoming work environment. Behavior that is rude, embarrassing, threatening, or intimidating, including the use of profane or abusive language, is not acceptable. You should discuss the matter with your leader, a higher-level manager, or medical staff office. You could also contact Human Resources or the Integrity and Compliance Line.

Q I have a problem with one of my colleagues. She and I share assignments in my department, but I feel like I carry most of the workload and she slacks off. I really don't want to work with her anymore. What should I do?

A When you have a conflict with a colleague, it is best to first discuss it privately with the person. Explain what you have observed and how it affects your work. You can also share your concerns with your leader. You should also discuss the issue with your leader if you believe the colleague's behavior may violate our Code of Conduct.

Q I work in the Human Resources department. Lately I've been finding confidential colleague information, including payroll data and other personal information, left behind in the copy room. What should I do?

A Protecting the privacy and security of colleague information is very important. Take the documents you've found to your leader or a higher-level manager in your department so they can determine the best way to follow-up.

Relationships with Suppliers and Other Business Partners

Trinity Health conducts business ethically and compliantly. All colleagues and service providers must maintain appropriate business relationships. Accepting gifts or entertainment from a business contact, such as a supplier, could cloud judgment when making business decisions. It might also give the impression that the vendor is buying favorable treatment.

Health care is a highly regulated industry. Giving and receiving gifts, meals, entertainment and travel may create a real or perceived conflict of interest. In some cases, those expenses could also be viewed as a kickback in violation of the law. You must obtain any required approval before accepting gifts, meals, entertainment or travel from a supplier, service partner, or industry stakeholder.

Our Core Value of Stewardship requires us to be faithful stewards of the human, financial, and natural resources entrusted to us. Ultimately Trinity Health bears the cost of supplier provided gifts, entertainment, and meals. The following guidelines apply to everyone (check with your leader as your department may follow more restrictive policies).

- Do not accept gifts, entertainment, meals, or other incentives that influence a purchasing or contracting decision, or could appear to improperly influence Trinity Health decisions.
- Do not accept gifts, entertainment, meals, or other incentives that encourage or reward patient referrals.
- Do not offer, accept, or solicit gifts, meals, entertainment, or other incentives that could be perceived as a bribe, payoff, deal or any other attempt to gain a competitive advantage.
- Do not accept cash or items redeemable for cash such as checks, gift cards, etc.
- Occasional non-cash items of nominal value (e.g., pens, note pads, coffee mugs) may be accepted, but are generally discouraged. Additionally, occasional consumable and perishable goods (e.g., fruit basket, flowers, cookie trays) shared with co-workers in a department or unit may be accepted but are generally discouraged.

- You should politely decline supplier and other service partner entertainment or social invitations. This includes activities like free or discounted tickets to sporting, theater or concert events, golf outings, travel, and lodging, etc. You may attend an entertainment or social event with a supplier or other service partner so long as you, not the supplier, pay your own cost to attend. Any exceptions require the advance approval of your leader and your organization's Integrity and Compliance Officer.
- Suppliers and other service providers may occasionally donate to charitable fundraising events that benefit Trinity Health and affiliated organizations. These events may include social or entertainment activities (e.g., golf or dinner) where Trinity Health colleagues are invited to participate. You can accept these invitations provided you have the advance approval of your leader. Trinity Health colleagues are encouraged (but not required) to make a personal donation to the fundraiser equal to the value of an individual attendee to the event.
- You may accept invitations to attend local or out-of-town programs, workshops, seminars, and conferences sponsored by a supplier or other business partner. These must have a legitimate educational purpose or otherwise support a Trinity Health business objective (e.g., product training). Acceptance of the invitation must also:

  (1) Be infrequent (e.g., no more than once annually);

  (2) With your leader's advance approval; and

  (3) Where Trinity Health, not the supplier, pays for any related travel expenses. Any exceptions to this policy require your leader's advance approval and review by your organization's Integrity and Compliance Officer.

Trinity Health discourages colleagues from accepting meals and refreshments paid by suppliers or other service providers. An occasional meal or refreshment may be accepted when these requirements are met:

- Such events are infrequent (generally 1-2 times per year).
- The meal is immediately before or after a legitimate business meeting.
- The setting for the meal is proper for discussing business (e.g., office or restaurant) and the host attends.
- The cost of the meal is modest (generally this means it does not exceed $50).
- Trinity Health does not incur additional travel or overnight lodging costs because of your participation in the meal.

The above requirements do not apply to meals and refreshments provided in connection with a conference or other educational program sponsored by a supplier, consultant or service partner for the benefit of all attendees.

All gifts accepted that are greater than $25 in value must be disclosed during the annual Conflicts of Interest Disclosure Survey process. Contact your Integrity and Compliance Officer for more information.

Fundraising

As a tax-exempt charitable organization, Trinity Health may solicit charitable contributions to support our health care ministry. Only colleagues who work in foundations or specific fundraising departments are permitted to solicit gifts from suppliers and other service providers. Fundraising requests to suppliers are not to be made in exchange for promises of Trinity Health business or to influence current or future business decisions.

Conflicts of Interest

Conflicts of interest may arise. We seek to ensure these conflicts do not have impacts on business decisions or operations. You are expected to avoid situations that could place you in conflict with Trinity Health interests. A conflict of interest may exist when your outside activities, personal financial interests or relationships interfere, or could appear to interfere, with your judgment or decision-making. In addition to gifts, entertainment and meals, be aware of these potential conflicts of interest:

- **Outside Employment:** You should discuss and obtain your leader's approval before accepting an offer to work for any organization that conducts business or competes with Trinity Health.
- **Endorsements and Testimonials:** Obtain your marketing department and leader's advance approval before making any endorsements or testimonials for suppliers, vendors, trade or professional organizations.
- **Financial Interests:** Generally it is a conflict of interest for Trinity Health to do business with a company in which you or a family member has a financial interest. It might also be a conflict for you to recommend a company in which you or a family member has a financial interest. Financial interests may include employment, compensation arrangements, and ownership or investment interests. Discuss with your leader any financial interests you or a family member have that might impact your Trinity Health job responsibilities.
- **Service on Outside Boards:** Trinity Health colleagues are encouraged to actively participate in charitable and civic organizations that benefit our communities. Obtain your leader's approval before accepting an invitation to join a board of any organization that may create a conflict of interest with your Trinity Health job duties.

When considering conflicts of interest, remember that appearances count! Discuss any questions you have regarding potential conflicts of interest with your leader or contact your organization's Integrity and Compliance Officer.

Questions & Answers

Q Suppliers frequently visit our office and bring in new products for us to sample. They always want to provide lunches for the office staff. Can we accept free supplier paid lunches?

A In general, Trinity Health discourages acceptance of supplier paid meals. Only accept these occasionally and when they are connected to a legitimate business purpose like a product demonstration. Take out food ("dine and dash") delivered to office staff are not allowed. Additionally, the cost of any supplier paid meals provided must be modest. Also consult your organization's local policies which may be more restrictive.

Q The firm my organization uses for marketing and advertising services offered me two suite tickets to a professional basketball game. Can I accept the tickets?

A You should politely decline the acceptance of gifts that involve social or entertainment activities such as free or discounted tickets to sporting events. You may accept the tickets only if you personally pay the supplier for the cost of the tickets.

Q A supplier recently called seeking my input on a new product under development. The supplier is holding an out-of-town meeting and asked me to attend. The supplier is willing to pay my airfare, hotel and meals for two days, as well as pay for my time to attend the meeting. Can I accept the invitation?

A Trinity Health policy prohibits acceptance of supplier-paid compensation, travel, lodging, and meal expenses. If your role includes making recommendations or decisions about the supplier's products, your acceptance of this offer could improperly influence your future decision-making. You and your leader should discuss the meeting's purpose, the supplier's expectations and the benefit to Trinity Health. Your leader and organization Integrity and Compliance Officer may approve your participation at the meeting so long as Trinity Health covers the expenses.

Q Suppliers frequently send gifts of fruit or candies to our department during the holidays. Can we accept these gifts or must they be returned?

A Although discouraged, you may accept occasional gifts (e.g., no more than 1-2 times a year) of perishable or consumable gifts that are shared with co-workers.

Q I work full-time, 12-hour shifts and would like to get some extra work hours at another health care provider in the community. Do I have to discuss with my leader before I accept another position?

A Before you consider an offer to work for a potential Trinity Health competitor, discuss the situation with your leader to make sure there are no potential issues. This issue is especially important for full-time colleagues.

Q I was asked by a professional organization to speak at an upcoming educational event. The organization has offered to pay my travel expenses and lodging for the day I am scheduled to speak. May I accept the offer?

A Yes, Trinity Health colleagues may accept travel expenses and lodging in exchange for professional speaking engagements. The expenses should be reimbursed only for the day you are asked to speak. For example, if it's a five-day educational conference and you will only be speaking on the first day, the reimbursed expenses should be for one night's lodging and related travel expenses.

Q My sister-in-law is a health care industry consultant. Is it okay if I recommend her to work on a consulting project?

A Yes, however you should fully disclose your relationship. You should not participate in the hiring decision, nor use your position to influence the hiring decision outcome. Also, you must not share any information with your sister-in-law that is confidential or that has not been provided to other prospective consultants.

Q I am the point of contact for a Trinity Health supplier. Our organization is conducting a major capital campaign and the supplier recently asked me what amount they should donate. They said they want to keep their Trinity Health contract. What should I say?

A You should refer the supplier to your organization's Foundation or fundraising department to discuss capital campaign contribution options. You should also advise the supplier that their decision to donate (and how much to donate) to the capital campaign is not a factor in current or future contracting decisions.

Relationships with Regulators and Those Who Pay for Our Services

Trinity Health receives payments for patient care and services from federal and state health care programs like Medicare and Medicaid. Trinity also has contracts with commercial insurance and other third parties for payment of services.

There are many Medicare and Medicaid laws and regulations that apply to our operations. Our contracts with insurance companies also include certain requirements we must follow. These laws and other obligations are complex and can be challenging to apply in a rapidly changing environment. Trinity Health is committed to complying with all applicable laws and regulations. We must:

- Always act with honesty and integrity.
- Follow all laws, regulations and policies that apply to our work. Ask for assistance if you have questions. See *Resources to Assist You* on Page 21.
- Follow all Medicare, Medicaid, and other federal and state health care programs requirements. Also follow all commercial insurance companies and other third-party payer requirements. This includes:
  - Delivering high-quality, medically necessary, and appropriate services.
  - Creating and maintaining complete and accurate medical records.
  - Submitting complete and accurate claims for services provided.
  - Protecting the privacy and security of health information we collect.
- Respond to accrediting (or other external agency) surveys with honesty, openness and accurate information. Do not take actions that obstruct or mislead an accrediting or external agency survey team.
- Submit accurate and complete reports to federal and state regulatory agencies. This includes cost, quality, safety, tax and other reports.
- Be mindful of antitrust requirements. Do not discuss or share pricing, market strategies, payer strategies, or wages and benefits information with competitors. Consult with Legal counsel on any matters that involve antitrust laws.

- Screen colleagues, board members, vendors, and other parties to confirm they can participate in federal health care programs. We do not do business with, employ or bill for services rendered by individuals or entities that are excluded or ineligible to participate in federal health care programs. You must notify your leader if you become excluded, debarred, or ineligible to participate in federal or state health care programs.
- Present only truthful and non-deceptive marketing and advertising information.
- Conduct all medical research activities consistent with all laws and regulations, Institutional Review Board and Trinity Health policies.
- Participate in Trinity Health training and education programs. These assist you in knowing the laws, regulations, and Trinity Health policies that apply to your work.
- Cooperate with any government investigation. Never destroy or alter documents or information. This includes electronic documents, records, or messages. Never lie or make false statements to a government investigator.
- Do not offer gifts or other items of value to a government representative.
- Do not contribute – or direct the contribution of – Trinity Health funds to any political candidate, political party, or political campaign.

Trinity Health's Commitment to Compliance with the Law

You should be aware of some key laws and regulations and how they affect Trinity. Listed below are some key regulatory areas that impact our daily job responsibilities.

Fraud and Abuse

Trinity Health is always looking for ways to improve our fraud, waste and abuse prevention and detection. Our fraud, waste, and abuse prevention program includes multiple management controls and oversight across multiple departments. Fraud and abuse laws generally prohibit:

- direct, indirect or disguised payments in exchange for patient referrals.
- submission of false, fraudulent or misleading claims or bills, including claims for services not rendered or claims which do not comply with payer requirements.
- making false representations to any person or entity to participate in a program or obtain payment for any service.

Fraud and abuse laws are designed to protect government health care programs, like Medicare and Medicaid, and other third parties that pay for the health care services we deliver. To support compliance, we must:

- submit accurate and truthful claims for services provided.
- submit claims only for services provided.
- provide only medically necessary services.
- not submit claims for services not covered by the payer.
- never make false statements or representations to get claims paid.
- make repayment to a health care program or payer when required.
- not offer or pay money, goods, or anything of value to encourage or reward patient referrals.

Relationships with Physicians and Other Referral Sources

You may work with physicians or other persons or entities that refer patients or residents to Trinity Health facilities. You must be aware of the laws and regulations that apply to these relationships. These laws include the federal Anti-Kickback Law, Stark Law, laws that apply to tax-exempt organizations, and similar state laws. The intent of these laws is to ensure medical decisions and actions are in the patient's best interest. The goals are to prevent over-utilization and protect federal health care program funds.

Trinity Health has specific policies and procedures for financial relationships with physicians and other referral sources. There are two key principles that apply to all such relationships:

1. We do not pay for referrals. Patient and resident referrals and admissions are based on an individual's medical needs and our ability to render the needed services. Trinity Health does not pay or offer payment to anyone for patient or resident referrals.
2. We do not accept payments for referrals. Trinity Health does not ask or receive anything of value, directly or indirectly, in exchange for patient or resident referrals to a Trinity Health facility. We do not take into account the value or volume of referrals made to us when making referrals to other health care providers.

Physician and other referral source financial relationship laws are complex. There can be unintended violations of the law, which could result in significant legal and financial consequences. Always contact Legal counsel or your Integrity and Compliance Officer if you have questions about these laws.

Tax-Exemption

Most Trinity Health organizations are not-for-profit, tax-exempt organizations operated exclusively for religious or charitable purposes. Activities that support our charitable purpose include care of those who are poor, benefits provided to our communities, and medical education programs. Trinity Health is required to follow a number of tax laws and regulations. These laws generally prohibit:

- Using Trinity Health assets to benefit individuals who are in a position of substantial influence.
- Paying more than "fair market value" for goods and services. Also providing goods and services to others at less than fair market value unless allowed by law.
- Campaigning (including indirect activities) for or against the election of any public office candidate. Trinity Health funds may not be donated to any political candidate, party organization, or committee.
- Engagement in substantial lobbying activities. Trinity Health may comment on legislation or regulations under consideration. We may also take public positions on issues relating to our operations and mission.

The False Claims Act

The False Claims Act protects the federal government from being overcharged or sold substandard goods or services. This federal law makes it a crime for any person or organization to knowingly make a false record or file a false claim to a federal health care program. "Knowingly" includes having actual knowledge that a claim or record is false. It also includes acting with "reckless disregard" as to whether a claim is false. Most states have adopted similar state false claims laws.

False Claims Act penalties are significant. Financial penalties can be as high as three times the claims amount plus fines of $11,000 - $22,000 per claim. Willful violations of the False Claims Act can also result in criminal penalties.

The federal False Claims Act and most similar state laws allow individuals with original information about fraudulent activities in government programs to file a lawsuit on behalf of the government. If these individuals are successful with their cases, they can receive a portion of the government recoveries.

All Trinity Health colleagues, volunteers, physicians, suppliers and service providers are protected from being fired, demoted, threatened or harassed for filing a False Claims Act lawsuit. This is called non-retaliation.

You are encouraged to contract your organization's Integrity and Compliance Officer or the Integrity and Compliance Line if you have questions or suspect fraudulent activity.

Questions & Answers

Q My colleague regularly uses the work Internet for personal activities. I am not their leader, but this seems wrong. What should I do?

A You should discuss this matter with your leader or a higher-level manager. We all must ensure that resources and assets are used each day to primarily support Trinity Health activities. These resources include supplies, materials, equipment, and colleague work time. The occasional personal use of technology resources, like the Internet, is allowed if it doesn't interfere with the colleague's work or violate any Trinity Health policies.

Q I used to work for a competitor organization. I have information from that organization that could help Trinity Health in negotiating more favorable supplier contracts. Can I share this information?

A No. Do not disclose confidential information you obtained from another job. We may not use this information in any business dealings. Further, it would be unethical for you to share any confidential information you may learn from your Trinity Health job with a future employer.

Q A colleague I work with frequently posts updates on Facebook. Sometimes he makes references to his day at work. He never mentions any patient or long-term care resident names. He does sometimes discuss unusual cases in detail. Should I be concerned?

A Yes. Just because there is no patient or long-term care resident's name does not make it "okay" to discuss on a social media site. Patients or residents can still be identified based on the uniqueness of the situation. Disclosure of confidential information via social media could put our patients and residents at risk. It might also be a violation of federal privacy laws. This can result in hefty fines and criminal penalties for both the organization and the colleague who made the posting. You should discuss this matter with your leader or contact Trinity Health's Privacy Center of Expertise for assistance.

Q I recently witnessed some unusual activity occurring at my organization's loading dock. Several shipments of expensive computer equipment were picked up by another company and taken away. I questioned my leader who gave me an explanation, but the more I think about it, the answer just doesn't seem to make sense. What should I do?

A You should discuss the issue with a higher-level manager in your department or contact your Integrity and Compliance Officer. The explanation may be correct and there may be nothing wrong occurring. However, when there is something about an answer you receive that bothers you, or just doesn't feel right, it's best to discuss the issue with another member of your organization's management or your Integrity and Compliance Officer.

Q I assist my boss in preparing her expense reimbursement reports. She often submits receipts for meals and entertainment expenses without specifying who attended and without a description of the meeting's business purpose. My boss is extremely busy, and I don't like to bother her with questions or make it seem like I don't trust her. What should I do?

A First, make sure you clearly understand your organization's specific expense reimbursement policy documentation requirements. Share these requirements with your boss. Explain you want to assist her in providing all the required expense reimbursement documentation. Ultimately, she is responsible for the expense reimbursements submitted on her behalf. If this approach does not work, you should contact a higher-level manager in your organization or your organization's Integrity and Compliance Officer for assistance.

This Code of Conduct addresses common issues and questions. Working in the health care industry can be challenging. There are complex and frequently changing rules and regulations. There may be times when the answer to a particular issue or question is not clearly addressed in the Code. You are responsible for seeking answers to your questions or concerns. There are many resources to assist you.

Where to Find Help

Direct Leader This is usually the best place to start in getting answers. Your leader knows the work you do. They may already have the information you need or can direct you to the right resource. If your issue or concern involves your direct leader, seek help from one of the other resources listed below.

A Higher-Level Manager or Leader If you are not comfortable discussing the issue with your leader or do not agree or are uncomfortable with the answer you receive, discuss the issue with a higher-level leader in your organization.

Human Resources Your organization's human resources staff can likely answer many of your questions and assist you in addressing workplace issues and concerns.

Integrity and Compliance Officer Your Integrity and Compliance Officer is responsible for the Integrity and Compliance Program operations in your organization. They are available to assist you in obtaining answers to your questions and concerns.

Resources to Assist You

Your Organization's Integrity and Compliance Officer

Dawn Geisert
Senior Vice President, Chief Compliance & Integrity Officer, Integrity and Audit Services
734-343-3010
dawn.geisert@trinity-health.org

Integrity and Compliance Line - You are encouraged to use one of the resources listed here to address your questions and concerns. You are always welcome to contact the Trinity Health Integrity and Compliance Line at 866-477-4661. You may also file a report online at www.mycompliancereport.com using THO as the access code. You may choose to remain anonymous. All reports are treated as confidential as possible. See further information on the Integrity and Compliance Line in the information box.

Legal - Contact the legal department when you need legal advice or guidance.

Mission Department and Local Ethics Committee - Guidance on matters relating to Mission and Core Values, Ethical and Religious Directives for Catholic Health Care Services, pastoral care, advance directives, end of life issues and patient rights are best addressed with your local mission department and/or local ethics committees.

Medical Staff Office - If you are a privileged practitioner, you are encouraged to contact your organization's medical staff office to discuss any issues or concerns.

Privacy and Security Officials - Contact the Privacy Center of Expertise if you have questions or concerns related to the use or protection of personal health information or confidential business information: privacyofficer@trinity-health.org or 833-718-1043.

Risk Management and Safety - If you have questions or concerns related to patient care or workplace safety or are seeking guidance regarding the disclosure of medical errors or adverse events, please contact your local risk management and/or safety departments.

Patient and Colleague Safety Event Reporting Systems - We have reporting systems designed to assist colleagues, medical staff, and others in reporting "near misses'; errors and other events involving patient care or safety. Reports can be made anonymously. You should be familiar with your organization's system to report patient safety events.

This could be the Voice Organization Incidents, Complaints and Events (VOICE) system or the MIDAS system. All colleague injuries, threats or "near misses" should be reported promptly to the colleague's leader and to the workers' compensation claims coordinator. If it is available at your organization, use the Trinity Health Employee Incident Report (THEIR) system. If the THEIR system is not available at your organization, use your organization's standard workers' compensation injury reporting process.

Trinity Health values your opinions, insight and feedback. The most efficient way to resolve concerns is through the internal resources listed on Page 21. If you feel a patient care concern has not be effectively addressed, there are also external reporting options available including The Joint Commission Office of Quality and Patient Safety: email complaint@jointcommission.org, Mail One Renaissance Boulevard, Oakbrook Terrace, Illinois 60181. Individual state survey agencies may also be contacted with concerns.

Obligation to Speak-Up

Trinity Health supports an environment that encourages all of us to seek answers to questions and to report issues and concerns. We are all expected to report any activity we believe may violate applicable laws, regulations, professional standards of practice, or this Code of Conduct. We should use one or more of the resources listed to make the report. If the matter has previously been reported and you believe it has not been given sufficient attention, you should report the matter to a higher level leader, your Integrity and Compliance Officer or the Integrity and Compliance Line.

Non-Retaliation Policy

Trinity Health has a "zero tolerance" policy for any form of retaliation against those who report issues and concerns in good faith. This includes reports about potential violations of our Code of Conduct. Retaliation includes direct as well as indirect actions, or the threat of actions, of leaders, co-workers, or others.

Integrity and Compliance Line

866-477-4661 or **www.mycompliancereport.com** Access code = THO

The Integrity and Compliance Line is staffed 24 hours a day, seven days a week by an outside organization. When you call the Integrity and Compliance Line, you will speak with an individual trained to listen to your questions and concerns. They will gather as much information from you as possible. If you prefer, you may submit your issue online at the website address listed above. When prompted for an access ID, please use THO. We do not trace or record reports, and the Integrity and Compliance Line does not use caller ID.

When submitting a report, you always have the option to remain anonymous. Trinity Health uses every effort to maintain, within the limits of the law, the confidentiality and identity of any individual who reports issues and concerns. Your report will be provided to Trinity Health for review and investigation. When using the phone system to file a report, you will be provided a report identification number for you to check back on the status and ultimate resolution of your report.

Trinity Health follows its non-retaliation policies and medical staff bylaws. Retaliation is subject to discipline, including dismissal from employment, suspension of medical staff privileges, or termination of Trinity Health business relationships. If you believe you are being retaliated against for making a report or raising a concern, contact your Integrity and Compliance Officer or the Integrity and Compliance Line.

Acknowledgment Process

All Trinity Health colleagues are required to acknowledge their receipt and review of this Code of Conduct, confirm they understand it represents the mandatory Trinity Health policies and agree to abide by it. New colleagues are required to do so as a condition of employment. All Trinity Health colleagues are required to participate in annual Code of Conduct training designed to reinforce awareness and understanding.

Adherence to and support of our Code of Conduct and participation in related training activities is considered in decisions regarding hiring, promotion and compensation for all Trinity Health colleagues.

TRINITY HEALTH

Code of Conduct

Trinity Health

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