

# Our Code of Ethical Business Conduct and Our Culture of Ethics and Compliance

## A Message from Tim Pehrson

INTEGRIS Health’s Mission is “Partnering with people to live healthier lives,” and our Vision is to be “The Most Trusted Partner for Health.” To be trusted requires us to continuously improve outcomes for our patients in all aspects of our Pillars of Trust—Safety, Quality, Experience, Access, Affordability and Engaged Caregivers. Living our iCare Values also builds trust and is the foundation for the way we do our work. To be trusted we must be ethical and honest in all our business dealings, and compliant with all applicable laws of the land. Collectively, these create a strong culture of trust.

We have created a Code of Ethical Business Conduct to help each of us do the right thing, in the right way, and to strengthen our culture of trust. This guide applies to all of us and is intended to outline the standards of behavior and working relationships we are expected to uphold on a daily basis. It is not a substitute for good judgment, nor does it cover every situation.

It is our commitment to our patients, communities, each other and the organization to conduct our business with integrity and excellence. Please spend time to understand our Code of Ethical Business Conduct (“Code”). Practicing its principles is the right thing to do for our patients and creates the trust we aspire to in our Mission and Vision.

Thank you for your continued dedication to our patients and for your commitment to upholding INTEGRIS Health standards in our Code.

Warmly,

Timothy Pehrson  
President and CEO

## Our Mission, Vision and Values

### MISSION

Partnering with people to live healthier lives.

### VISION

The Most Trusted Partner for Health

### VALUES

#### iCare

**Integrity.** We are honest and consistently adhere to the highest standards of ethical and professional behavior.

**Compassion.** We are kind and suspend judgment to appreciate others’ perspectives and situations.

**Accountability.** We take ownership for our actions and outcomes.

**Respect.** We embrace diversity and inclusion, and value others.

**Excellence.** We seek to continuously improve, leading to exceptional outcomes.



## Who Must Follow the Code?

All caregivers who work at INTEGRIS Health must follow our Code as well as related policies and procedures; this includes the Governing Board of INTEGRIS Health and all affiliate Boards, all caregivers, medical staff members, contractors, consultants, agents, students, volunteers and vendors.

## Our Code of Ethical Business Conduct

We are true to our mission in pursuit of our vision. We skillfully care for our patients and provide high-quality care in every interaction in accordance with our iCare values.

**We sustain a safe and inclusive working environment where everyone's contribution is valued and respected.** All our caregivers and visitors come to a healthy and safe workplace where everyone can contribute and fully utilize their talents.

**We ensure patients understand their rights.** When we listen to our patients, protect their rights and preserve their dignity, we honor the trust they have placed in us. We promote patient safety and autonomy in care decisions and treatment choices.

**We only access, use or disclose patient information for appropriate business or treatment reasons.** We ensure our patients right to access and use their health information, and we do not interfere with the appropriate use or sharing of health information with providers, family or other appropriate recipients. We access, use and/or disclose a patient's medical information only when we have a legitimate business reason for doing so, receive proper authorizations, or as required by law and we follow our record retention policies and procedures.

**We document, code and bill appropriately, and do our part to prevent and detect fraud, waste and abuse.** Our documentation of business and patient records is clear, complete and accurate. We do not falsify or alter any document, such as business, employment or medical records. We also code and submit claims information that is accurate and in compliance with applicable federal health care program and contractual requirements. We report and return any identified overpayments.

**We are fair and honest in our dealings with each other, our business partners and vendors.** In these business relationships, everyone has a right to be treated lawfully and in an ethical manner.

**We follow our policies to ensure INTEGRIS Health's assets are used for appropriate business purposes.** We protect strategic and business operations information from disclosure to others who do not need to know our confidential information, as it may cause harm to the organization.

**We are committed to the highest standards of ethics and compliance in everything we do.** We know the rules that apply to our individual jobs and comply with all regulatory standards that apply to our business. Patients place their trust in us and we honor that trust with living our iCare values.

**We identify and report conflicts of interest, avoid them when we can and manage the unavoidable ones.** We always select business partners and vendors on the basis of objective criteria and disclose any potential and actual conflict of interest in a timely manner, both on an annual basis and as they might arise. We follow our policies and principles of good business ethics pertaining to gifts, entertainment and business courtesies.

**We are honest and ethical in our interactions with physicians and other referral sources.** Physicians and other health care providers are often able to refer patients to our facilities. Federal and state laws have specific requirements that we follow to ensure referrals are proper, based on the needs of the patient and not in return for gifts or special favors. We prohibit paying for referrals or accepting anything of value in exchange for the referrals of patients.

**We are responsible for speaking up whenever we believe our values, policies or the law are being violated or have questions about doing the right thing.** If I see or suspect a situation that may be a violation of our values, this Code, our policies, or the law, I will speak up. I know that an issue cannot be addressed if it is not raised.

## Our Responsibilities

All of us have a role to play in protecting INTEGRIS Health's reputation; doing our part means that we have the following responsibilities:

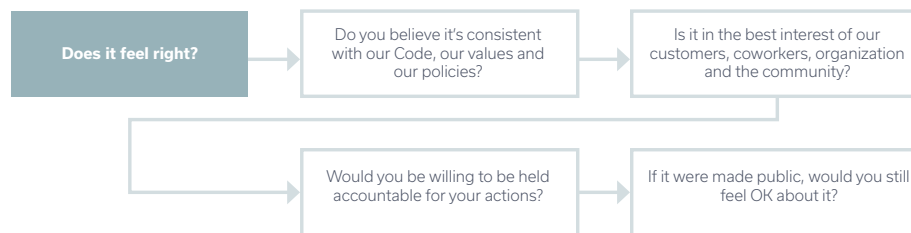
- Be familiar with and follow the information contained in this Code, as well as the INTEGRIS Health Code Guidance, policies, procedures, laws and regulations that apply to you and your job.
- Ask questions and report concerns.
- Always act in a professional, honest and ethical manner.
- Work as a team and treat others respectfully.
- Proactively seek to resolve problems.
- Cooperate and be truthful when responding to an investigation, inspection or audit.
- Certify that you have read, understood and follow this Code.

## Leaders Have Additional Responsibilities:

- Set an example for others to follow.
- Ensure caregivers understand the policies, procedures, laws and regulations that apply to their work.
- Be approachable. Maintain a setting where others feel comfortable asking questions or raising concerns.
- Be respectful and provide appropriate and timely responses to questions or concerns.
- Assess developing circumstances quickly and accurately, keeping the Compliance Department informed of potential compliance concerns.
- Be fair and consistent when enforcing our standards and when holding caregivers accountable.
- Never ask or pressure anyone to do something you would feel uncomfortable or are prohibited from doing yourself.
- If you supervise third parties, ensure they understand their obligations to this Code and our expectations.

## Making Good Decisions

Making good decisions is not always easy. At times you will feel under pressure or may be unsure of what to do. When faced with a difficult decision, ask yourself:



- Yes** If you answered "yes" to all of these questions, then the decision to move forward is probably OK.
- Not Sure** Ask your supervisor or another internal resource for guidance.
- No** If you answered "no" to any of these questions, stop and seek help. The action could have serious consequences.

## How Do I Report A Concern?

- Discuss the issue with someone in your Chain of Command.
- Talk to Human Resources, Legal Services or the Compliance Department.
- Email Compliance at [compliance@integrisok.com](mailto:compliance@integrisok.com) or report using the online form by using this QR code.
- Call the Integrity Line at 888-243-9597.



Our Integrity Line is available 24 hours a day, seven days a week. All contacts are confidential, to the limit allowed by law. If you prefer, you can make an anonymous report. It is important to provide as much information as possible (e.g., who, what, when, where,) which will help us review the report and investigate any potential Code violation or misconduct.

**We support those who raise concerns and never tolerate retaliation.** You can be comfortable sharing concerns and asking questions without worrying about retaliation. We take retaliation claims seriously; they will be investigated, and if substantiated, retaliators will be disciplined up to and including termination of employment.