

Code of Conduct

COLQUITT REGIONAL MEDICAL CENTER

Code of Conduct

Colquitt Regional Medical Center is committed to conducting business in an ethical and honest manner and within the bounds of the law. This Code of Conduct is intended to provide Trustees, employees, physicians, volunteers, affiliates, vendors, and other agents of Colquitt Regional Medical Center with guidelines for conducting business in a manner which fulfills that commitment. This Code of Conduct supports the mission, vision, values and compliance program of Colquitt Regional Medical Center and applies to all who provide services under the auspices of the medical center or its affiliates. (See Compliance Program Policies, 400.31)

The standards contained in this Code of Conduct are important, and therefore any violation will be handled in accordance with the Progressive Disciplinary Policy, as outlined in Personnel Policies or other applicable policies and procedures of Colquitt Regional Medical Center and its Medical Staff. In addition, referral of certain matters will be made to government and regulatory agencies as appropriate and as defined in the Compliance Program Policy. The overall responsibility for operation and oversight of the Compliance Program belongs to the Colquitt County Hospital Authority Board of Trustees; however, the day-to-day operation and oversight rests with the Compliance Officer. The Compliance Officer is assisted by an internal Compliance Committee approved by the Authority and reports quarterly to the Audit Committee of the Authority Board.

Questions and How to Report Violations of the Standards

It is important to Colquitt Regional Medical Center that employees have an effective way to get an answer to any question they may have about how to conduct their job. It is also important for employees and other agents to report any instance of a known or suspected violation of this Code of Conduct.

In the event that an employee has a question or concern or believes that someone is conducting their business in an illegal, unethical, or otherwise questionable manner, or violating Colquitt Regional Medical Center's policies, it is preferred that the employee first contact his or her supervisor to discuss the matter. There are times, however, when either the response the employee receives may be inadequate or the employee may feel uncomfortable in discussing the matter with his or her supervisor. In those cases, the employee should contact the Corporate Compliance Officer, Jessica Jordan, or call the toll free telephone hotline at [866-370-5993](tel:866-370-5993). All calls to the hotline are confidential, and the caller may remain anonymous. Follow up on all calls is available by a return call to the hotline. Failure to report noncompliance may possibly result in disciplinary action and may subject the medical center or its employees to Civil or Criminal sanctions. Reporting of violations may be anonymous and without fear of retaliation.

Colquitt Regional Medical Center's Commitment to Compliance

Colquitt Regional Medical Center strives to . . .

Comply with the Law. Colquitt Regional Medical Center is subject to numerous local, state and federal laws pertaining to all aspects of its operation. All employees are required to understand and abide by those laws which are applicable to them in the performance of their jobs.

Provide Excellent Patient Care. Colquitt Regional Medical Center employees shall strive to provide quality care in a manner designed to preserve their dignity and well-being. Each patient should be respected, with their needs and desires considered as health care decisions are made. Steps shall be taken so that each patient understands his or her treatment needs and options, treatment methods utilized, and treatment outcomes. Colquitt Regional Medical Center and its Affiliates will provide services in a manner that provides care that is sensitive to cultural, racial, religious and other differences and do not discriminate on the basis of race, religion, age, ethnicity, culture, language, socio-economic status, sex, sexual orientation, gender identity or expression, national origin, physical or mental disability, or source of payment. At all times, competent and qualified individuals will provide appropriate care, while considering the safety and well being of the patients.

Protect Confidential Information. Colquitt Regional Medical Center is committed to maintaining the confidentiality of patient, personnel, and other proprietary information in accordance with applicable legal and ethical standards. Consistent with HIPAA (Health Insurance Portability and Accountability Act), we do not use, disclose, or discuss patient specific information with others unless it is necessary to serve the patient or otherwise required by law.

Adhere to Anti Referral and Health Care Fraud and Abuse Legislation. All representatives of Colquitt Regional Medical Center are required to comply with laws which prohibit health care fraud and abuse. Activities that are prohibited include, but are not limited to:

- Intentionally or knowingly making false or fraudulent claims for payment or approval
- Offering or receiving remuneration (such as a kickback, bribe, or rebate) as an inducement to make a referral for the furnishing (or arranging for the furnishing) of any item or service
- Submitting false information for the purpose of gaining or retaining the right to participate in a plan or obtain reimbursement for services
- Referrals by a physician of Medicare or Medicaid patients to any entity for "designated health services" when the physician or an immediate family member has a financial relationship with the entity (unless the arrangement complies with applicable legal

exceptions).

Not Accept Inappropriate Gifts or Gratuities. The following standards apply to the giving or receiving of gifts and gratuities.

Receiving Gifts from Patients and Vendors: Employees are prohibited from soliciting tips, personal gratuities or gifts from patients and vendors. All gifts and other incentives from vendors who are in current negotiations for contracts or services should be declined. Nominal or fully consumable gifts from current vendors may be accepted that would not improperly influence business decisions.

Giving Gifts to Patients and Vendors: Employees shall not offer or give money, services or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, vendor, patient, governmental official or any other person.

Anyone who is in doubt about whether a situation involving the giving or receiving of something of value is acceptable, should ask his or her supervisor, or the Compliance Officer.

Avoid Conflicts of Interest. Employees and other associates are prohibited from engaging in any activity, practice, or act which conflicts with, or appears to conflict with, the interests of Colquitt Regional Medical Center, its patients or its vendors. Therefore, Employees, Medical Staff members, Board members, and other individuals must disclose any potential conflict of interest they or their immediate family have in any firm which does business with Colquitt Regional Medical Center. (See Conflict of Interest Policy 400.38)

Keep Accurate and Complete Records. No employee should knowingly or with reckless disregard for the truth make any false or misleading statements at any time. All patient records must meet the documentation standards required for quality care and to meet reimbursement regulations. Any individual who contributes to the medical record must provide accurate documentation and never alter or destroy anything that is part of the official medical record. Employee travel and entertainment related expenses must be accurately documented and supported when seeking reimbursement from the hospital. Medical records and other business documents will be retained in accordance with state and Federal law.

Promote Honest and Open Business Practices. Colquitt Regional Medical Center promotes competitive procurement and does not employ or contract with individuals or entities that are excluded or ineligible to participate in federal healthcare programs, suspended or debarred from federal government contracts, or has been convicted of a criminal offense related to the provision of healthcare items or services and has not yet been reinstated in a federal healthcare program, provided we are aware of such criminal offense.

Not Tolerate Harassment or Discrimination. Colquitt Regional Medical Center and its affiliates promotes a work environment that is free from harassment, coercion of any kind, and discrimination on the basis of race, religion, age, ethnicity, culture, language, socio-economic status, sex, sexual orientation, gender identity or expression, national origin, and physical or mental disability.

Provide Compliance Education and Training. Orientation and yearly staff updates on the Colquitt Regional Medical Center's Compliance Program and this Code of Conduct are required for all employees and for others as required in the medical center's policies and procedures. The Code of Conduct, Compliance Program Policy, and the False Claims Act Policy are available on the Colquitt Regional Medical Center's website