



OUR
CODE OF CONDUCT

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INTRODUCTION

This **Code of Conduct** has been adopted by Great River Health Board of Directors to provide guidance in carrying out daily activities, promoting organization-wide integrity, and supporting our commitment to upholding the Great River Health mission, vision and values.

Board members, employees, medical staff members, students, volunteers, contractors and others who conduct business for or on behalf of Great River Health have a responsibility to act in a manner that is consistent with this Code of Conduct and its supporting policies.

You are not expected to have expert knowledge of all legal and regulatory requirements that may apply to your role with Great River Health. However, you are expected to:

- Be familiar with this Code of Conduct,
- Be sensitive to legal and ethical issues,
- Ask questions if you are uncertain about any situation, and
- Report your concerns.

If you have questions regarding Great River Health Corporate Compliance, Code of Conduct or associated policies, or you encounter a situation you believe violates provisions of these guidelines, you should immediately contact your supervisor, the Chief Compliance Officer, Human Resources and/or the Compliance Hotline.

When someone's actions violate our Code of Conduct, policies and procedures, or applicable laws and regulations, it can harm the health system and our patients. Misconduct hinders our ability to achieve our mission, vision and values.

We take potential violations seriously. When we learn about possible misconduct, we review it carefully and take appropriate steps to investigate and, if necessary, make corrections. If a law is violated, the result could be civil or criminal action against Great River Health and the person responsible.



A MESSAGE FROM THE PRESIDENT & CEO

Dear Team Member,

At Great River Health, we are proud to provide quality healthcare to the people in southeast Iowa. We play an important role in keeping our community healthy. Our team is skilled, experienced, and resourceful, and we always aim to be fair and honest in our work. We follow all the rules, laws, and regulations, as well as our own organizational policies and procedures.

Our Code of Conduct helps us make good choices every day and promotes honesty and integrity throughout our organization. It guides us in doing the right thing. While the Code may not cover every situation, it is a helpful reference and reminds us to follow our values. If you come across a situation that doesn't seem right or makes you uncomfortable, please talk to your supervisor, the Chief Compliance Officer, or another executive team member.

You are an important part of our healthcare team, and supporting our Code of Conduct is crucial for achieving our mission. I encourage you to read the Code carefully, ask questions if you're unsure about something, and take responsibility for your actions and decisions. Every day, we strive to provide the best healthcare by living our values.

If you see any unsafe practices, unethical behavior, or violations of the Code, our policies, or any laws or regulations, it is your responsibility to speak up and share your concerns.

Thank you for your commitment to Great River Health and for doing what's right every day. Your actions make a difference.

Thank you for being part of our team,



Dr. Michael McCoy
President & CEO



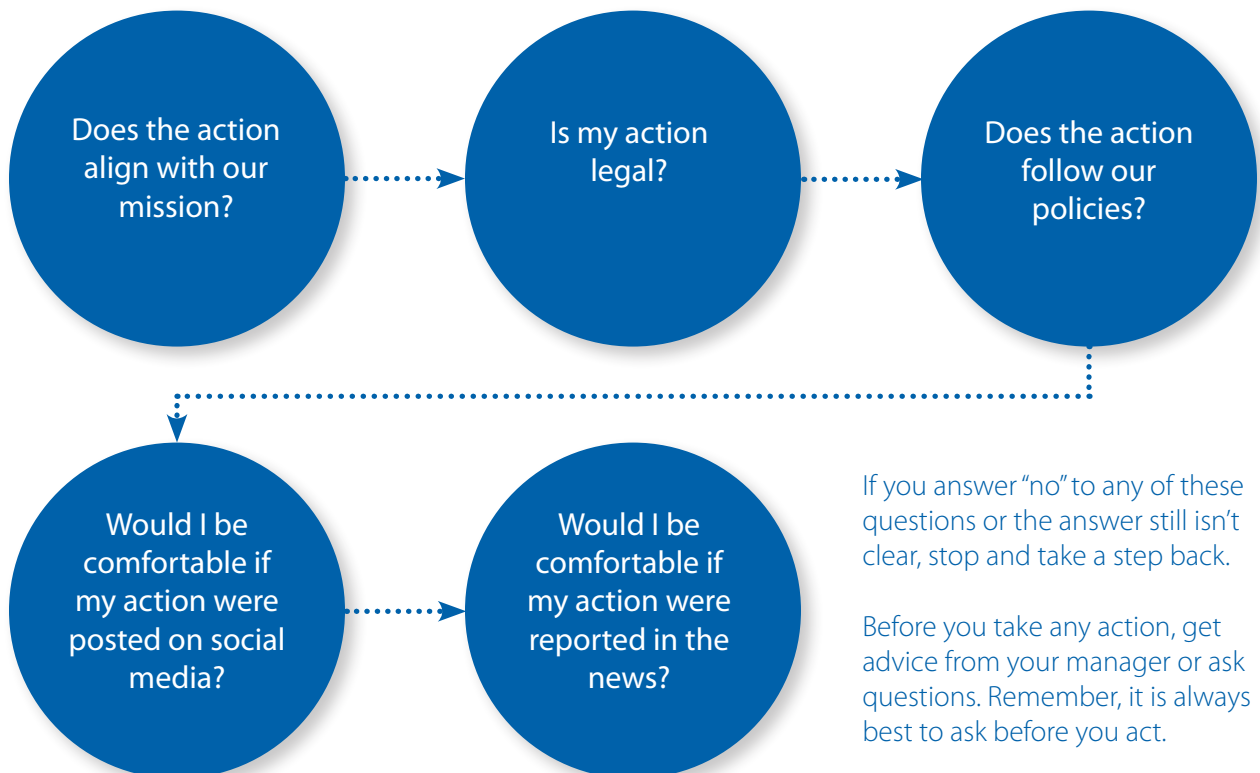
ETHICAL DECISION MAKING

Everyone is responsible for performing duties in a manner consistent with the requirements in our Code of Conduct. Know the Code. Read it and follow it.

Ask yourself:

- Are my decisions and actions based on the mission, vision and values of Great River Health?
- Do I make good decisions?
- Do I act responsibly, professionally and ethically?
- Do I communicate respectfully and honestly?
- Do I consistently follow Great River Health policies and procedures?
- Do I demonstrate compliance with applicable laws and regulations?

You make many choices while serving patients, the community and each other. But there may be times when the right choice isn't clear. If that happens, ask yourself:



If you answer “no” to any of these questions or the answer still isn't clear, stop and take a step back.

Before you take any action, get advice from your manager or ask questions. Remember, it is always best to ask before you act.

CONFIDENTIAL REPORTING

Our Commitment

Great River Health is committed to taking your concerns seriously. You have the responsibility to promptly report potential violations of applicable law, regulation, policy or procedure. You are protected from retaliation if you make a report in good faith.

Speak up

Speak up when something isn't right. It's always the right thing to do – even if you're unsure that misconduct has occurred.

How do I speak up?

Involve your supervisor, manager or another appropriate leader who can address and resolve the issue. If you need additional help, move up the chain of command.

Contact Human Resources.

If your concern is a workplace-related issue that can't be resolved in your chain of command and/or you are not comfortable reporting through chain of command, call Human Resources.

Contact Compliance.

If your concern is a compliance or business ethics issue, call Corporate Compliance, even if you feel the concern has been resolved.

Contact the Compliance Hotline.

You also can report a concern anonymously by telephone or by submitting an electronic event report. We don't attempt to identify anonymous reporters. These options are available 24 hours a day, 7 days a week:

- 800-565-0675 – Corporate Compliance hotline

Examples of issues and concerns that must be reported follows. These lists are not all-inclusive. Any concern regarding illegal or unethical behavior should be reported immediately.

Workplace concerns

- Difficulties between you and a coworker
- Failure to follow departmental policies and procedures
- Scheduling or wage and hour-related disagreements
- Unresolved performance issues
- Acts of discrimination based on race, color, national origin, sex, sexual orientation, gender, gender identity, religion, age (over 40), disability, military or veteran status
- Harassment
- Denial of request for reasonable accommodation related to medical condition, disability or religion
- Suspicion someone is working under the influence of controlled substances, including alcohol

Compliance and Business Ethics Concerns

- A workplace concern that has previously been reported to another member of management, leadership or Human Resources, but is unresolved
- You or another Great River Health employee or contractor has:
 - Been the subject of retaliation for reporting a concern in good faith
 - Inappropriately received something of value, such as supplies, equipment, gifts or gratuities from a service provider or supplier
 - Accepted travel accommodations (airfare, lodging, etc.) from an entity that conducts business with Great River Health
 - Improperly billed or coded patient accounts
 - Submitted false, inaccurate or questionable claims to Medicare, Medicaid or another payer
 - Falsified, inappropriately altered or destroyed official Great River Health documents (paper or electronic)
 - Improperly disclosed protected patient information
 - Been excluded by a sanctioning authority from performing services that are reimbursed by government providers such as Medicare and Medicaid



NON-RETALIATION

Our Commitment

Great River Health doesn't tolerate retaliation of any kind against anyone who shares a concern sincerely and in good faith.

What Should I Know?

We don't allow retaliation against anyone for making a good faith report of inappropriate conduct, even if it turns out the report was wrong. Not reporting is a violation of this Code, and it can result in disciplinary action up to and including termination of your employment or relationship with Great River Health. You are expected to help as appropriate with any investigation and resolution of a compliance issue.

The False Claims Act also provides protection against retaliation for whistle-blowers who have been discharged, demoted, suspended, threatened, harassed or otherwise discriminated against in the terms and conditions of employment by their employer in retaliation for filing a False Claims Act action.

What Should I Do?

If you feel that you have experienced retaliation for reporting inappropriate conduct, please contact Corporate Compliance or the Compliance hotline.

**Corporate Compliance Department:
319-768-3249**

**Compliance Hotline:
800-565-0675**

KNOW OUR CREDO

I show respect.

- Treat everyone with courtesy and kindness.
- Value and appreciate diversity in people and ideas.
- Recognize jobs well done and celebrate others' accomplishments.
- Instill enjoyment, positivity, and belonging.
- Adjust to change and be flexible.

I am committed to those we serve.

- Keep patients and their families at the center of our decision-making.
- Treat patients, their families and colleagues with courtesy and empathy.
- Identify and anticipate others' expectations and strive to exceed those expectations.
- Serve with passion and enthusiasm.
- Protect private and confidential patient and business information.

I am responsible for safety and high performance.

- Speak up with concerns and commit to a safe environment.
- Take initiative to solve problems and look for ways to do things better.
- Apologize for mistakes and commit to improving personal performance.
- Strive to exceed standards and expectations.
- Follow best practices and policies, or be a part of creating new ones.
- Behave with integrity and follow our Code of Conduct.

I listen and communicate effectively.

- Always communicate in a respectful way.
- Listen to and consider others' points of view.
- Recognize others' verbal and nonverbal behaviors.
- Deliver, seek, and accept constructive feedback in a respectful way.
- Share information appropriately.

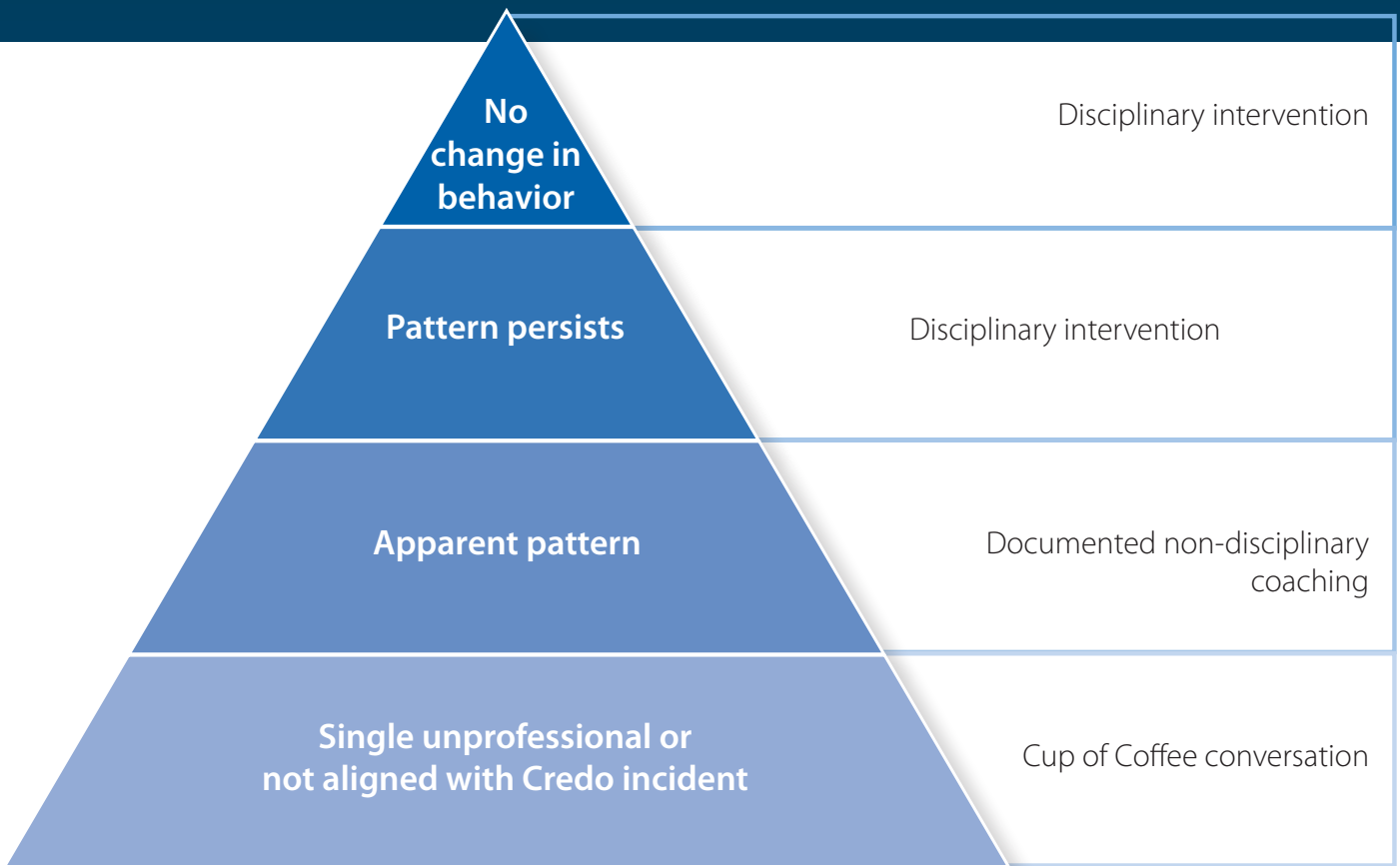
I have a sense of ownership.

- Treat our resources as if they were your own.
- Be accountable to this Credo.
- Accept responsibility for your decisions and actions.
- Use your and others' time effectively.
- Commit to continuous learning and improvement.
- Take pride in your work and being part of Great River Health.
- Represent Great River Health positively at work, in the community and online.

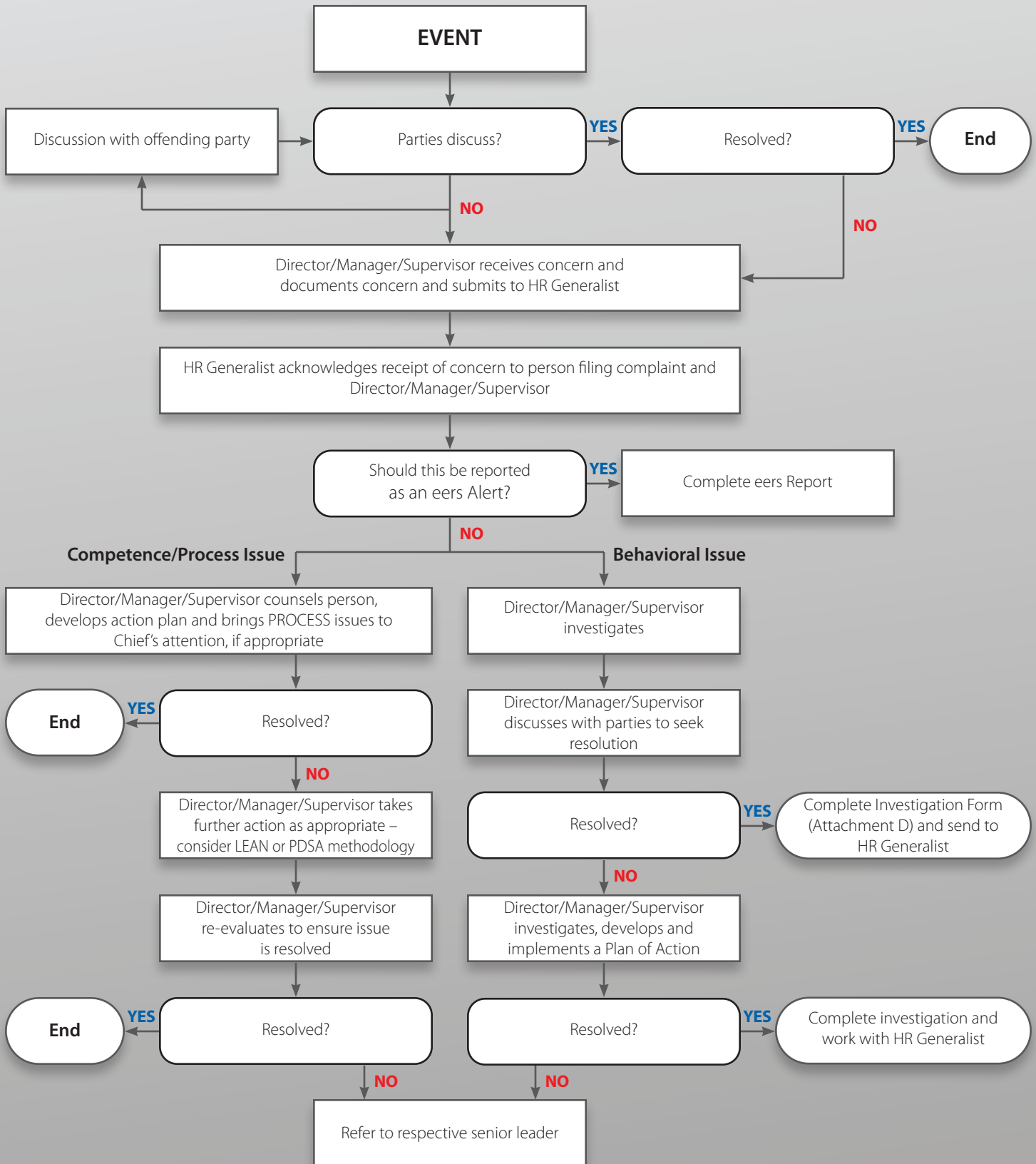
Our Mission

Great River Health empowers our people to provide compassionate, high-quality care while being good stewards of our resources.

PYRAMID OF PROFESSIONALISM



MUTUAL RESPECT AND TRUST RESOLUTION FLOW CHART





COMPLYING WITH LAWS

Great River Health is committed to compliance with all applicable laws, rules, and regulations.

A variety of laws and regulations apply to our industry, including those that cover:

- The integrity of claims
- Patient referrals
- Competition and marketing practices
- Emergency medical services
- Patient privacy and security of patient information

Violating laws and regulations that apply to health care could expose the health system and our employees to legal liability, fines and other penalties. You should know health system policies pertaining to the Federal False Claims Act, civil or

criminal penalties for false claims and statements, and whistle-blower protections under such laws.

Speak up about possible violations of laws or policies and cooperate in internal investigations, audits or reviews.



PATIENT INFORMATION

Great River Health is committed to appropriate protection of confidential information regarding our patients, employees and operations. We honor patient rights to access their own records and to have them disclosed by patient request.

Federal and state laws, and health system policies prohibit the unauthorized access, use or disclosure of confidential information contained in patient, employee or other organizational records. You are required to know and comply with laws and policies related to information privacy and security.

All patient Protected Health Information (PHI) – which includes patient medical and financial information, employee records, financial and operating data of the organization, and any other information of a private or sensitive nature – is considered confidential. Confidential information

should not be read or discussed by any employee unless pertaining to his or her specific job requirements.

User IDs, passwords and other authentication devices must be safeguarded and never shared or disclosed.

The HIPAA Privacy and Information Security policies provide additional information.

DISCRIMINATION

Great River Health is committed to fair and equitable treatment of employees, patients, and others, and will not discriminate.

We don't discriminate based on qualities like race, color, national origin, religion, sex (including pregnancy and childbirth), sexual orientation, gender (including gender identity and gender expression), age (40 or over), disability, genetic information, marital status or political belief.

HARASSMENT

Great River Health is committed to following our credo and keeping unacceptable or disruptive behavior out of the workplace.

The health system strictly prohibits harassment or contribution to harassment. This includes, but is not limited to, sexual harassment or misconduct, treating colleagues in a disrespectful manner, retaliation and bullying.

CONFLICTS OF INTEREST

Our service to Great River Health must be free of undue outside influence, loyalty or desire for personal gain.

A conflict of interest occurs when outside responsibilities or loyalties affect – or appear to affect – one's ability to carry out health system responsibilities independently and objectively. To identify and review potential conflicts of interest, health system, board members, employees and medical staff are expected to disclose all outside activities and financial interests that might be or have the appearance of being conflicts of interest.

The Conflict of Interest policy provides additional information.





VENDOR RELATIONSHIPS

Great River Health doesn't accept or provide personal gifts or favors, such as tips, meals, transportation, entertainment or anything of value for special consideration with regard to the health system's obligations and responsibilities. Gift of value have the potential to tarnish decision-making abilities. Corporate Compliance reviews the acceptance of all potential gifts.

You should minimize the acceptance of vendor gifts because they could appear to affect your business judgment. Follow health system policies to know when a vendor gift might be acceptable.

The Gifts and Business Courtesies policy provides additional details.

PATIENT REFERRALS

Great River Health maintains relationships with physicians and other referral sources based only on the needs of our community and in keeping with the health system's mission.

In accordance with federal and state laws, the health system prohibits paying for referrals or accepting payment for the referrals we make. Any engagement with a referral source must be in writing, and reviewed and approved under applicable laws and regulations, and health system policies and procedures.

CLAIMS AND BILLING

Great River Health is committed to timely and accurate documentation, coding and billing that reflects the services ordered and performed in the manner required by applicable laws, rules and regulations.

We rely on medical records to provide care, treatment and services to patients, and to submit claims for reimbursement. The False Claims Act prohibits us from knowingly making false claims for payment to the government and from keeping over-payments we receive from the government. We follow applicable rules for submitting bills and claims for reimbursement.





RESPONSE TO INVESTIGATION

Great River Health understands the unique laws and requirements that apply to our organization and is committed to upholding them.

Government representatives may make announced and unannounced visits to any health system location. Always treat visiting government representatives with courtesy and respect.

Government audits and investigations related to health system matters help us demonstrate that we follow policies and regulations.

In the event of an audit or investigation:

- Immediately notify your manager and Corporate Compliance.
- Never mislead a government official, auditor or investigator.
- Cooperate fully. Never prevent the collection of information.

OUR COMMITMENT

Thank you

For reading
Great River Health's **Code of Conduct**.

Apply it to your work, refer to it often and let it guide your decisions. Remember, you represent Great River Health to our patients and community.

If you have questions or feedback about anything in the Code or our policies, talk to your supervisor, manager or another appropriate leader.

If you believe there are exceptional circumstances requiring an exemption or waiver of anything in the Code of Conduct, contact Corporate Compliance.

