



Code of Conduct

A Code of Business Ethics

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Dear Colleague:


Summa Health is committed to promoting strong business ethics and accountability within our company, and we are very focused on corporate compliance. As you know, corporate compliance is being knowledgeable of, responsible for, and adhering to laws and regulations. This includes regulations governing federal and state healthcare programs, fraud and abuse matters, ethics, privacy and security requirements and corporate governance. The laws surrounding healthcare services, billing and collection are complex, and a strong compliance program helps Summa maintain its commitment to being an honest and responsible provider.

We work in a complex and ever-changing healthcare and regulatory environment, and although we each have different roles and responsibilities, we all want to do the right thing. As an employee, you are responsible for understanding healthcare compliance basics, determining what you need to do to be compliant, and understanding the consequences of violating the laws and/or compliance policies.

This Code of Conduct, or the Code of Business Ethics, clearly defines the expected standards of behavior, outlines our high standards of ethics and integrity, explains how to report possible violations of law or ethical principles and provides guidance as you perform your work every day.

We expect every employee, clinician, trustee, vendor, contractor and volunteer who is a part of our organization to understand and follow this Code of Conduct. Please read the material carefully, and ask questions about anything that is unclear to you.

On behalf of the senior leadership team, I want to thank you for doing your part to ensure our services are performed with honesty and integrity, and for your commitment to Summa Health.



Thomas Malone, M.D.
President and Chief Executive Officer
Summa Health

Code of Conduct

A Code of Business Ethics

Summa Health is pleased to provide the Code of Conduct which describes the values and standards we live by. Summa Health has a tradition of ethical standards in the provision of health care services as well as in the management of its business affairs. The Code of Conduct supplements the mission, vision and values of Summa Health , and applies to all who are employed, are contracted with us or provide services in our system.

As Summa Health employees, officers, directors, and representatives it is essential that we commit to complying not only with the letter, but also the spirit of these standards. Although the Code of Conduct covers some examples of ethical and business issues and scenarios, a single document cannot provide all the answers. Additional guidance is provided in the form of policies and procedures, business practices and processes.

Please be aware that just as industry standards and legal and regulatory requirements evolve, Summa Health standards, policies and procedures are amended from time to time. For the most current information you should visit the Summa Health internal website, Summa@Work. The information you see posted is the most up to date and is considered effective.

Do the right thing

- Read this Code of Conduct
- If an issue seems unclear, you should seek help from your supervisor. If that does not clear up the matter, you should seek further assistance until the issue is clearly resolved, including calling the compliance hotline.

Waivers of the Code

Any waiver of a provision contained in this document requires the written approval of the Compliance and/or Legal Department.

In addition any waiver requested for an executive, officer, or director requires the approval of the Summa Health Board Audit & Compliance Committee.

Act with Integrity and in Compliance with the Law

Everyone associated with Summa Health works together, according to shared values and standards to do the right thing. Our reputation as a leading healthcare depends on each of us making appropriate decisions every day.

What we expect from employees

As a Summa Health employee, you are expected to be honest, act ethically and demonstrate integrity in all situations. We trust you to do the right thing. The Code of Conduct provides general guidance but it is not all inclusive. This guidance is not a substitute for reading, understanding and following the health policies and procedures, business practices, processes and healthcare laws and regulations.

Most of the time, common sense and good judgment provide excellent guideposts. If an issue seems unclear, you should seek help from your supervisor. If that does not clear up the matter, you should seek further assistance until the issue is clearly resolved, including calling the Compliance Hotline.

Do the right thing

- Understand and comply with Summa Health commitment to integrity, expectations, standards, policies, business practices and processes, values, and any applicable laws and regulations as well as this Code of Conduct.
- You are responsible for developing skills to recognize and resolve work-related ethics and compliance concerns and demonstrating your commitment to maintaining ethics and compliance in your daily decision-making and conduct.
- Check the Summa@Work site for the most up to date policies and procedures.
- Participate in compliance, regulatory, or business ethics training opportunities
- Ask the difficult questions and challenge each other in a professional and respectful manner to address issues
- If an issue seems unclear, you should seek help from your supervisor. If that does not clear up the matter, you should seek further assistance until the issue is clearly resolved, including calling the Compliance Hotline.

What we expect from our leaders

As with all of the Summa Health employees, we expect our leaders to understand that business results, acting with integrity, and complying with healthcare regulations are all essential. To sustain a culture where trust and responsible business conduct is expected, our leaders must be a trusted resource for employees.

Leaders are expected to take ownership of compliance for the areas you are responsible for. Identify compliance risks and take prompt action to address them. Ensure your employees understand the laws and regulations with which they should be complying.

Do the right thing

- Lead by example; reinforce with employees that business results are not more important than acting with integrity.
- Make employees available for (and reinforce the importance of) attending compliance, regulatory, or business ethics training.
- Consider compliance efforts and results when evaluating and rewarding employees.
- Make sure employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation.
- Deal immediately with business conduct issues and take appropriate action. Resources to assist you include the Human Resources, Legal, and Corporate Compliance departments.

What Summa Health System expects from our business partners

We require our business partners (Board Members, Medical Staff members, Leased Practice Employees, Volunteers, Contracted Individuals and Groups, Vendors, Medical Residents and Students, etc.) interacting with any Summa Health entity to observe the same level of integrity, responsible business conduct and compliance with the law as Summa Health employees.

Employees should provide such third parties with a copy of the Summa Health Code of Conduct.

Questions and Answers

- Q:** I just read an article about some new regulations that will be effective in a few months. We will need to change some of our processes to comply with the new requirement. Our budget is already under pressure and the new requirements will add more time to our process, negatively affecting our productivity. What should I do?
- A:** Complying with our legal and ethical obligations is essential to maintaining our business. Sustainable long term performance requires that business results are achieved in a manner that complies with applicable laws, policies and procedures. Bring the matter to your supervisor's attention.
- Q:** What should I do if I think someone isn't complying with the Code of Conduct, a regulatory requirement, a law, or a policy or procedure?
- A:** Report your concern immediately. As an employee, it's your responsibility to report any potential violation. You should speak to your supervisor or another member of management. The compliance hotline is also available.



Ask Questions, Seek Guidance and Raise Concerns

When you do not know which decision is the best, or if you suspect someone else is not acting appropriately, the best thing you can do is to reach out and check with the resources available to you. It is better to ask the question than to regret the action.

Support to Help You Do the Right Thing

Help is readily available if you have questions, need information or assistance with any aspect of your role, or if you believe you should report a potential compliance issue. Summa Health has made available a variety of resources to assist you in what is expected in the workplace. This includes, but is not limited to, employee manuals, policies and procedures, and education courses.

If an issue seems unclear, your best resource to go to is your supervisor with your questions or concerns. If that does not clear up the matter, you should seek further assistance until the issue is clearly resolved, including calling the Compliance Hotline.

Do the right thing

- Don't assume the way things have always been is appropriate
- Ask questions, seek guidance, and raise concerns
- Use the resources available to you.
- If you suspect or know that someone has violated the Code of Conduct, our policies, or any applicable laws or regulations, you must act and report the violation.



Corporate Compliance Department

The Corporate Compliance Department, under the leadership of the Chief Compliance Officer, is responsible for the Code of Conduct, the Compliance Plan, the Compliance Hotlines, and partnering with business leaders to identify, assess and address compliance risks.

Phone (330) 996-0307
Email corpcomp@summahealth.org
Mail 525 E. Market St.
P.O. Box 2090
Akron, OH 44309-2090
Fax (330) 996-0303



Compliance Hotlines

- Compliance Hotlines are available 24/7
- Callers have the option to remain anonymous
- All calls are treated confidentially
- All calls are taken seriously and investigated

Compliance Hotlines

We encourage calls to report suspected violations of the Summa Health Compliance Plan, the Code of Conduct, or of federal and state laws and regulations (e.g. improper coding or billing practices, etc). The Summa Health Compliance Plan, Code of Conduct, the Summa Physicians Inc. Compliance Plan, and the NewHealth Collaborative Compliance Plan are not intended to handle human resources issues such as salaries and wages, benefits and personnel matters. For those issues, you should consult your employee handbook, the Human Resource Policies and/or your human resources representative.

The Compliance Hotline is intended to supplement, not replace, other channels for communicating questions and concerns within the system. It should be used when other avenues of communication

have been exhausted or you are uncomfortable with disclosing your identity when reporting a concern.

Compliance Hotlines:

Summa Health	1(800) 421-0925
Summa Physicians Inc.	1(866) 527-6215
NewHealth Collaborative	1(855) 280-8475

No retaliation

You can report a violation without worry. If you make a compliance report in good faith, you will not face retaliation. Our policy forbids supervisors and other employees from engaging in retaliatory acts against anyone who reports a violation or cooperates in an investigation of a potential violation or concern. If you believe you have been retaliated against for raising a concern, immediately contact your supervisor, the Compliance Officer, or the Compliance Hotline.

A word about inquiries and investigations

Summa Health handles inquiries and investigations confidentially. The substance of your inquiry and your identity (if you choose to provide your name) is disclosed on a strict need to know basis to the extent deemed necessary to conduct a proper investigation and to respond appropriately. When you ask a question, seek guidance, or raise a concern, you will receive a response if you have provided the means to do so. If a concern is substantiated, the situation will be resolved through appropriate corrective actions which may include among other things, clarification of a company policy, additional training, facility or process change and/or disciplinary action.

Do the right thing

- Cooperate during investigations and audits during your employment with Summa Health and after your employment ends
- Tell the truth
- Do not discuss an investigation or audit with other employees

Violations

Failure to adhere to Summa Health's Code of Conduct, policies and procedures, business practices, processes and applicable laws results from acting outside the scope of your employment or engagement with the health system. Employees may be subject to discipline, up to and including termination, while business partners may be subject to termination of relationships, breach of contract, or due process. Any person, group, or company may also face repayment or restitution, civil fines and criminal penalties.

Learn more by reading these policies:

- A. Reporting Actual or Potential Wrong Doing
- B. Non-Retaliation Non-Retribution

Questions and Answers

- Q:** I've been thinking about calling the Compliance Hotline, but I'm not sure if I should. My supervisor told me to do something that I feel is dangerous and may violate a safety regulation. I think I should tell someone who can look into this, but I'm afraid that my supervisor will make my job difficult for me if I do. What should I do?
- A:** Even in great health systems, people sometimes do things they shouldn't. You have identified what you believe is a potentially serious matter. If something does not seem right, you should speak up. Your supervisor is often the best place to raise concerns, but because it is your supervisor's request that concerns you, have other options including contacting the Human Resources Department, the Legal Department, the Corporate Compliance Department, or report your concern anonymously through the Compliance Hotline.

The right thing to do is to report your concern. When you do, the situation will be looked into and we will not tolerate your supervisor or anyone else retaliating against you. If you believe you have been retaliated against for raising a concern, you should immediately contact the Compliance Officer or the Compliance Hotline.

- Q:** If I call the Compliance Hotline to report a concern, will I find out the outcome of the investigation?
- A:** All calls to the Compliance Hotline are taken seriously and investigated. When you ask a question, seek guidance, or raise a concern, you will receive a response if you have provided the means to do so.

Comply with Laws and Regulations

Summa Health complies with the laws and regulations that govern our industry.

Healthcare is a highly regulated industry with numerous laws applying to the work that we do. You are responsible for knowing and complying

with laws that relate to the performance of your job, whether or not they are specifically addressed in this Code of Conduct. Following are examples of laws or regulations that impact Summa Health.

Healthcare Fraud, Waste and Abuse

Fraud includes obtaining a benefit through intentional misrepresentation or concealment of material facts. Waste includes incurring unnecessary costs as a result of deficient management, practices, or controls. Abuse includes excessively or improperly using government resources.

Summa Health complies with all federal and state regulations to properly ensure the preparation and submission of accurate and complete claims. Summa Health will not submit false, fraudulent or misleading information to the government or any third party payer to obtain payment for a service.

We prohibit any employee, representative or subcontractor from knowingly presenting or causing to be presented claims for payment that are false, fictitious or fraudulent. All subcontractors that perform billing or coding services must have the appropriate skills, training, quality assurance processes, necessary procedures, and knowledge of federal and state regulations to ensure that all billings are correct. Summa Health is committed to maintaining current and accurate billing.

Do the right thing

- All billings to government and private payers must reflect truth and accuracy.
- All medical record documentation must be complete, accurate, and support the service being billed.
- Summa Health will only bill for items or services that are actually rendered.
- Summa Health will bill only for those services that are reasonable and necessary for the diagnosis or treatment of the patient’s illness or injury. The claim must be supported by the patient’s documented medical condition.
- Summa Health will properly code its claims to actually reflect the service furnished to the patient consistent with the patient’s diagnosis.
- Summa Health will avoid duplicate billing for the same services.

False Claims Act [31 U.S.C. § § 3729-3733] [18 U.S.C. § 287]

The False Claims act has both a civil and criminal aspect and protects the Government from being overcharged or sold inferior or non-

existent goods or services. It is illegal to submit claims for payment to Medicare or Medicaid that you know or should know are false or fraudulent. The definition of ‘knowing” includes not only actual knowledge but also instances in which the person acted in a way that was in ignorance or dismissal of the truth. No specific intent to defraud is required.

Do the right thing

- Submit bills for services, procedures, tests, supplies, or medications prescribed, accurately and only for services provided.
- Do not destroy electronic or hard copy records outside of the record retention policy.
- When making revisions to electronic or hard copy medical records, do so in compliance with the policy on addendums and late entries.
- Ensure all orders, tests, procedures, documentation, charges, coding, and cost report information submitted to the government or third party payer is completely accurate and not misleading.
- If you discover an error in a claim that has already been submitted contact your supervisor, the Compliance Department or the Compliance hotline.
- Direct other employees to record and report only information that is accurate, true and complete.

Anti-Kickback Statute [42 U.S.C. § 1320a-7b(b)] (AKS)

In some industries, it is acceptable to reward those who refer business to you. However, in the Federal health care programs, paying for referrals is a crime. AKS prohibits asking for or receiving anything of value in exchange for referrals of Federal health care program business. Healthcare anti-kickback laws provide important safeguards and it’s our responsibility to understand and uphold these laws. An example of an illegal kickback is providing a direct, indirect or disguised payment in return for referring patients.

Do the right thing

- Summa Health shall not solicit, receive or offer to give anything of value to anyone in exchange for referral of patients.
- Contracts with referral sources shall conform to all applicable laws and shall be reviewed by the Legal Department prior to being entered into.
- Summa Health shall take no action which would otherwise be suspect merely because it appears to be customary in a particular location or particular area of business activity.

Physician Self-Referral Law [42 U.S.C. § 1395nn]

The Physician Self-Referral Law, commonly referred to as the Stark law, prohibits physicians from referring patients to receive “designated health services” payable by Medicare or Medicaid from entities with which the physician or an immediate family member has a financial relationship, unless an exception applies. Financial relationships include both ownership/investment interests and compensation arrangements.

“Designated health services” are:

- Clinical laboratory services;
- Physical therapy, occupational therapy, and outpatient speech-language pathology services;
 - Radiology and certain other imaging services;
 - Radiation therapy services and supplies;
 - DME and supplies;
 - Parenteral and enteral nutrients, equipment, and supplies;
 - Prosthetics, orthotics, and prosthetic devices and supplies;
 - Home health services;
 - Outpatient prescription drugs; and
 - Inpatient and outpatient hospital services.

Financial Arrangements with Physicians

All financial arrangements with physicians or other referral sources must be reviewed by the Legal Department prior to entering into such arrangements. All financial arrangements with physicians or other referral sources must be necessary for legitimate business purposes, set forth in writing at fair market value, and signed by all parties involved. Summa Health will not pay for referrals, nor will they accept payment for referrals made to other facilities. Summa Health will not consider the volume or value of referrals in establishing compensation under their agreement with a physician or other referral sources.

These arrangements may also be reviewed by other corporate officers and the Medical Executive Committee as appropriate, for compliance with applicable federal and state laws and regulations as well as Joint Commission standards.

Do the right thing

- Complete the annual Conflict of Interest questionnaire.
- Do not refer patients to a designated health service that you or an immediate family member has a financial relationship.
- If you have questions about laws related to your interactions with physicians, ask your supervisor, the Legal Department or

Corporate Compliance who can provide you with answers or additional information.

Exclusion Statute [42 U.S.C. § 1320a-7]

The government maintains a list of individuals/companies that have been determined to be excluded from the ability to participate in Federal Health Care programs. There are numerous reasons why individuals/companies are excluded; some examples are convictions of criminal offenses, patient abuse, fraud, and defaulting on school loans. No payment from any Federal health care program will be made for items or services that are provided by excluded individuals/ companies. Summa Health cannot employ, contract with, or have any services provided by an excluded individual/company.

Do the right thing

- Notify Human Resources immediately if you are currently, or to the best of your knowledge, will be in the future, listed by the Federal Department of Health and Human Services Office of Inspector General, the General Services Administration, or the State of Ohio as a person who is excluded from participation in Federal health care programs.

Medicare and Medicaid Program Requirements

Summa Health participates in the Medicare program and the Ohio Medicaid program. The rules and requirements of these programs are numerous and some aspects change frequently. You are responsible for knowing and complying with the program requirements applicable to your role.



Do the right thing

- Be engaged in your work process; keep up with the dissemination of information on regulatory changes for your area of responsibility.
- Implement any required changes to your work flow, processes, policies or procedures to comply with regulatory changes.
- If you have questions, ask your supervisor who can assist you.

Health Insurance Portability and Accountability Act (HIPAA)

HIPAA regulations, which protect the privacy and security of patient information applies to all of our interactions with patient information. Patients have the right to expect that their medical information will remain confidential. Under HIPAA regulations and health operating policies, if you have access to patient information, you need to be thoroughly familiar with HIPAA regulations and the health system policies and procedures. You must not reveal any personal or confidential patient information unless you have a legitimate business or patient care purpose.

Do the right thing

- Be knowledgeable of and comply with Summa Health HIPAA Privacy and Security policies and procedures.
- Never use or disclose confidential information in a manner that violates the privacy rights of our patients.
- Only access protected health information that is necessary to perform your job.
- Do not share or post computer passwords.
- Do not discuss protected health information in public areas such as the cafeteria, elevators, or outside of the workplace.
- Do not allow someone without a Summa badge to access protected health information.
- If you have HIPAA related questions, contact your supervisor, the HIPAA Privacy Officer or HIPAA Security Officer at your facility.

Anti-Trust

Generally speaking, antitrust and competition laws constrain or prohibit discussions or agreements among competitors that restrain trade. This can include discussion about past, present or future prices, bids, terms or conditions of sale and territorial markets.

Summa Health employees and representatives are prohibited from engaging in the following:

- Agreements with competitors to fix prices, allocate markets, rig bids or engage in collusion (including price sharing).
- Boycotts or refusals to deal with suppliers or vendors, including

- certain exclusive dealing and price-discrimination agreements.
- Unfair trade practices, including bribery, misappropriation of trade secrets, deception, intimidation and similar unfair practices.

Do the right thing

- Exercise caution when talking with a competitor; be alert to improper discussion when attending industry meetings or functions.
- Question how any information about a competitor was obtained and whether the information is confidential.
- Do not acquire competitive intelligence through improper means.
- Seek guidance from the Legal Department whenever you have any questions or are unsure about a situation involving a competitor.

State Laws and Regulations

The State of Ohio has also adopted similar laws that apply to the provision of healthcare services provided at Summa Health. It is the responsibility of all employees to comply with applicable federal and state laws, regulations, and Summa Health policies and procedures that relate to your duties as an employee. If an issue seems unclear, you should seek help from your supervisor.

Do the right thing

- Be engaged in your work process; keep up with the dissemination of information on regulatory changes for your area of responsibility.
- Implement any required changes to your work flow, processes, policies or procedures to comply with regulatory changes.
- If you have questions, ask your supervisor who can assist you.

HIPAA PRIVACY:

Summa Akron City & St. Thomas Campus:
(330) 375-7518

Summa Barberton and Summa Health Center at Wadsworth-Rittman Campus:
(330) 615-3041

Summa Physicians Inc.:
(330) 375-7515

HIPAA SECURITY:

Summa Akron City & St. Thomas Campus:
(330) 996-0322

Summa Barberton Campus:
(330) 615-3079

Summa Physicians Inc.:
(330) 996-8566

Licensure or Certifications Related to Your Job Responsibilities

All employees who have made application for employment for a position requiring licensure, registration, or certification by the State of Ohio must possess a valid, current license, registration or certification. At the time of renewal of licensure, registration or certification, employees are required to provide verification to your supervisor.

Do the right thing

- You are responsible for timely completing the requirements to maintain your licensure or certification.
- Provide verification of your license or certification renewal to your supervisor prior to license or certification expiration.
- If you or your company have had any action taken against your license, have been excluded from participation in a federal healthcare program, or have been found guilty, pled guilty, or no contest to a criminal violation you must notify your supervisor or Human Resources immediately

Compliance with Tax Exempt Requirements

Summa Health has multiple charitable, tax-exempt entities. These organizations provide community benefits that include health care services, medical training, education, research and community outreach activities. Summa Health also provides significant free and discounted care to indigent patients and participates in federal and state medical assistance programs. Summa Health has a legal and ethical obligation to act in compliance with applicable laws, to engage in activities in furtherance of its charitable purpose and to ensure that its resources are used in a manner that furthers the public good, rather than the private or person interest of any individual or entity. Summa Health and its employees will avoid compensation arrangements in excess of fair market value, will accurately report required information to appropriate taxing authorities and will file all tax and information returns in a manner consistent with applicable laws. All pension and benefit plans must conform to the Internal Revenue Code, the Employee Retirement Income Security Act (ERISA), and other applicable laws.



Political Activity

Summa Health is not permitted to engage in excessive lobbying activities at the state or federal levels, nor may its assets be used to support or oppose political candidates. Violations of this policy may jeopardize the tax-exempt status of various Summa Health entities. While employees are encouraged to participate in federal, state, and local government they must be sure that their activities are not viewed as activities taken on behalf of Summa Health. Further, employees will not be reimbursed in any manner for their involvement in political activities.

Government Officials

Summa Health is committed to complying fully with the law and cooperates with any reasonable demand made by a government representative. If any employee receives an inquiry, subpoena or other legal document regarding Summa Health business, whether at home or in the workplace, from any governmental agency, the employee must notify his or her supervisor and a member of the Legal Department immediately.

During a government investigation, inquiry or inspection, you must never conceal, destroy, or alter any documents, lie, or make

misleading statements to the government representative. You may not cause another employee to provide inaccurate information or obstruct, mislead or delay the communication of information or records relating to a possible violation of law.

Questions and Answers

- Q:** Whose responsibility is it to understand the laws and regulation in my work area?
- A:** It is the responsibility of all employees to comply with applicable laws, regulations, and Summa Health policies and procedures that relate to your duties as an employee. If an issue seems unclear, you should seek help from your supervisor.
- Q:** Where can I find Summa Health policies?
- A:** On Summa Health intranet, Summa@Work.
- Q:** What is meant by kickbacks or incentives for patient referrals?
- A:** Anything of value flowing to someone who refers or is in a position to influence referrals may constitute a kickback. Examples include excessive discounts, supplies and equipment, gifts, writing off accounts receivables, professional courtesies, leases at less than fair market value, etc. If there are any questions about this, you should speak with your supervisor, the Legal Department or the Compliance Department.
- Q:** What do I do if I'm at a meeting with competitors and an improper discussion about anti-competitive matters takes place in a group setting?
- A:** You must immediately object to the subject and end the discussion. This may require you to leave the room if the improper discussion continues after you object. Even after stating an objection, failure to withdraw from the group could be used to support an argument that an agreement existed if the improper discussion is continued. Any improper discussions should be promptly reported to the Compliance or Legal Departments regardless of the steps you took to object.
- Q:** I am active in political campaigns and have given donations in support of various candidates. Is this a conflict with my position at Summa Health?
- A:** As long as you are contributing your personal time and money to public campaigns, there is no problem with your position. The time you contribute must not be part of your normal business hours and in no way can it be inferred that Summa Health is contributing to the campaign. Any money that is contributed must be given by you personally and not reimbursed or paid directly by Summa Health funds.
- Q:** Recently, someone in my department made a mistake and sent a patient's information to the wrong person. Should I report this as a potential HIPAA violation?

- A:** Yes. Any potential HIPAA violation must be reported to protect the privacy of the patient's information. Summa Health is required to determine if any harm (financial or reputational) that may result from the mistake and protect the patient from the harm to the extent possible. Please notify the entity HIPAA Privacy and/or HIPAA Security Officer.

Avoid Conflicts of Interest

We make decisions based on sound business judgment and unclouded by any personal interest, relationship pressure or potential for personal gain.

Conflicts of Interest

A conflict of interest arises when outside personal, financial, political or social interests or activities have the potential of making it difficult to perform your work in the best interest of Summa Health. You must avoid situations that conflict, or could have the appearance of conflicting, with the best interests of Summa Health. Conflicts of interest can occur in a variety of ways; however, the following situations can often produce conflicts of interest and should be carefully analyzed:

- Doing business with family or close friends
- Hiring consultants, agents and other third parties with whom you have a personal relationship
- Accepting entertainment or gifts from people or entities with which we do business

Annually, the Code of Conduct questionnaire is presented for completion to all Board Members, Directors, Officers, Management staff, Employed Physicians, Physicians in Leadership positions, Contracted Physicians, and to members of committees with purchasing decision-making roles. The questionnaire is a required element to continue your position as a leader or contractor with Summa Health. If a situation arises throughout the year that presents an actual or potential conflict, you are obligated to report it immediately.

If you do not receive the annual questionnaire but you have an actual or potential conflict of interest, you are obligated to report it immediately to your supervisor.

Do the right thing

- The best way to avoid a potential conflict of interest is to ask questions and address any situation that has the potential to be misinterpreted by others.
- If you're unsure about what poses a conflict of interest, talk with your supervisor or the Compliance Officer.
- Make decisions in the best interest of Summa Health.
- Resolve conflicts of interest in an open, transparent manner.
- Submit the annual conflict of Interest questionnaire timely and immediately report any situation that arises and presents an actual or potential conflict of interest.

Receiving and Offering Gifts and Gratuities

The rules for gifts and gratuities put precautions in place to prevent any impropriety or damage to Summa Health's reputation, which is central to preserving our integrity. The basic rule is simple: Never accept a gift, favor, service or entertainment, if your acceptance could be viewed as influencing a business decision or action.

Use good judgment about accepting gifts. Only gifts that are ordinary, customary expressions of social or business friendship or courtesy (meals, entertainment, golf, etc.) may be accepted. Avoid accepting anything with more than a small value (\$100). If possible, share any gifts with your co-workers. The following items shall never be accepted: Money and travel that is not business related. All site visits to be paid for by vendors are to be approved by the Administrative Director of Materials Management.

In addition, employees and directors of Summa Health may not attempt to influence the decisions of others by offering them money, services or other things of value.

Do the right thing

- What if you are not sure about accepting a gift? Ask your supervisor.
- Any gift, meals or entertainment accepted above the \$100 value must be reported on your annual conflict of interest statement.

Questions and Answers

- Q:** I am a full time employee of Summa Health. I've been asked to consult with another healthcare company using the skills I use in my job with Summa Health. Is that a conflict of interest?
- A:** You can work a second job without a conflict of interest so long as the second job does not interfere with your responsibilities



at Summa Health (e.g. you are able to continue to dedicate necessary time and attention to your Summa Health job, you are not competing with Summa Health, you do not use the assets or confidential information of Summa Health etc.) Since you are a full time employee and would be using the same skills you use in your job with Summa Health, there is a potential for a conflict of interest. The best way to avoid a conflict is to talk with your supervisor before accepting any outside employment or consulting arrangement.

- Q:** As a supervisor, I have been offered a computer and software free if I sign a contract with a certain vendor. I thought it would be a way to increase efficiency and get a good deal on the items that we need. Is this a problem?
- A:** This is not allowed by Summa Health. It could be seen as an inducement or gift.

Intellectual Property and Proprietary Information

Information and ideas of Summa Health are important to our success.

Summa Health Intellectual Property and Proprietary Information

Information pertaining to our competitive position or business strategies, payment and reimbursement information, and information relating to negotiations with our workforce or third parties should be protected and shared only with those that need to know such information in order to perform their job responsibilities. This type of information may only be disclosed to other parties internally or externally without the specific authorization of Summa Health management.

Information received in confidence is not to be used for personal gain.

Copyright Laws

Summa Health employees and representatives shall not reproduce any copyrighted materials without the express permission of the copyright holder. Copying copyrighted works, even for internal distribution, can lead to substantial organizational and personal liability for copyright infringement. Copyrighted works include, but are not limited to, printed articles form publications, magazines, books, television and radio programs, videotapes,

musical performances, photographs, training materials, manuals, documentation, surveys, software programs and databases. In general, the laws that apply to printed materials are also applicable to all other media, including visual and electronic media such as diskettes, CD-ROM, DVD, and Internet pages.

Software Licensure

All software used in connection with Summa Health business must be properly licensed and used in accordance to that license.

Do the right thing

- Do not load personal computer software programs onto Summa Health owned computers.
- All software requests should go through the routine budgeting and Information Technology and processes.
- If you are unsure if material you would like to share is copyrighted, please ask your supervisor.
- Do not share Summa Health intellectual property or proprietary information without the approval of management.

Personal Use of Organizational Resources

Summa Health assets are to be maintained and used for business-related purposes. Unauthorized use, taking or borrowing of Summa Health equipment, supplies, materials or services is prohibited. Personal use of any Summa asset without prior supervisory approval is forbidden. Unauthorized removal of Summa Health property and unauthorized or inappropriate use of Summa Health supplies, equipment and/or services are offenses that may result in immediate termination. Community or charitable use of Summa Health resources (including employee time, information and telephone) must be approved in advance by a supervisor. Use of Summa Health assets for personal financial gain is not permitted.

Questions and Answers

- Q:** I am aware that some people in our department have copied software that they did not purchase onto their computer hard drives at work. Is there anything I should do if I am aware that this is happening?
- A:** Yes, you should remind the employee that copying someone else’s licensed software without written permission is not legal and may result in financial penalties, in addition to disciplinary action by Summa Health. If the employee refuses to remove the software from the hard drive, you should report the matter to your supervisor. The supervisor should be made aware so that if something happens in the future, it is known about.



Record Accuracy

We maintain a high standard of accuracy and completeness in the documentation and reporting of all our financial records. These records serve as a basis for managing our business and are important in meeting our obligations to patients, employees, suppliers and others. These records are also necessary for compliance with tax and financial reporting requirements.

Accounting and Financial Responsibility

Summa Health is committed to the highest standards of business ethics and integrity, and to maintaining the integrity and accuracy of its books, records, and accounts. This requires every employee to record and report information accurately and honestly, including accurate reporting of time worked, business expenses incurred, revenues and costs, and other business-related activities.

Summa Health’s records must accurately reflect the assets, liabilities, revenues and expenses of Summa Health. All company records are subject to audit, and financial records are to be maintained in accordance with generally accepted accounting principles, as well as with all applicable federal, state, and local laws.

As Summa Health receives reimbursement under government programs, it is required to submit reports to government agencies on the costs of our operations. Summa Health commits to complying with all Federal and State laws, regulations and policies defining allowable costs and appropriate methodologies to claim reimbursement for services provided.

Do the right thing

- Record and report all information accurately and honestly
- All employees are to accurately report their time worked
- If you have any questions regarding generally accepted accounting principles, or the federal, state, and local laws regarding your job duties, ask your supervisor.

Questions and Answers

- Q:** How often do the hospitals have to submit cost reports to the government?
- A:** It is an annual requirement to submit a Medicare cost report and separately a Medicaid cost report.
- Q:** I have heard we have external auditors on site – are they investigating us for a problem?
- A:** Summa Health has a contract with an external auditing firm to complete routine audits of multiple aspects of our business to ensure our systems and processes are functioning as we intended. They validate our financial reporting to ensure its accuracy.

Relationships with Patients

Summa Health is committed to providing the highest quality of care and delivering services in an ethical, professional manner. We shall provide high quality care to all patients without regard to race, creed, age, gender, religion, national origin, or disability.

We shall treat all patients with dignity, respect, and compassion at all times. We will honor the patient's right to give informed consent. We understand that informed consent is a continuing process and not just a form.

We shall honor the right of patients, or their legal designees, to participate in decision making regarding their care, including refusing treatment to the extent permitted by law and being informed of the consequences of such action.

To avoid compromising the quality of care, clinical decisions including tests, treatments and other interventions are based on identified patient health care needs. The plan of care is developed by a team of healthcare professionals based on the acuity of the patient's condition.

EMTALA

Any patient who comes to one of our Emergency Departments requesting examination or treatment for an emergency medical condition is entitled to, and shall be provided with, an appropriate medical screening examination. This exam will be performed by a qualified medical practitioner regardless of the patient's ability to pay for the services. If it is determined that an emergency medical condition exists, the facility shall provide treatment to stabilize the emergency medical condition (within the capabilities of the facility), or provide an appropriate transfer to another medical facility in accordance with Emergency Department policies and procedures. Emergency medical treatment should not be delayed in order to inquire about the patient's method of payment, or to seek authorization from the patient's insurance carrier for screening or stabilization services.

Learn more by reading the EMTALA policies at each Summa hospital.

Admission, Transfer, Discharge

Admissions, transfers and discharges are conducted in a medically appropriate and ethical manner, and in accordance with local, state, and federal laws and regulations. Summa Health does not base admission or transfer policies on patient or hospital economics.

Patient Freedom of Choice

Patients always have the freedom to choose their care provider. While we can and should properly promote Summa Health programs and services, we will never restrict in any way the patient's freedom

to choose a home health agency, DME supplier, long term care facility, or any other provider to meet their medical needs.

Do the right thing

- Do: Treat patients who come to the emergency department requesting an exam regardless of their ability to pay. No employee or representative of the shall turn away a patient for lack of health insurance coverage or other inappropriate criteria.
- Do: Provide high quality care to all patients regardless of age, race, gender, ability to pay, sexual orientation, religion, creed, color, or medical condition.
- Do: Follow Summa Health policies and procedures related to admissions, transfers, discharge, and patient's freedom of choice.

Questions and Answers

- Q:** My patient does not speak English. How am I supposed to communicate?
- A:** Each facility has access and a process to obtain interpreters. It is the caregiver's responsibility to ensure that every attempt is made to find a means of communication.
- Q:** Can we let patients know that Summa Health has a Home Health service?
- A:** While we can and should properly promote Summa Health programs and services, it is up to the patient to determine which service they will use. We will never restrict in any way the patient's freedom to choose a home health agency, DME supplier, long term care facility, or any other provider to meet their medical needs.

Relations with Vendors and Subcontractors

Good relations with subcontractors and vendor representatives are important for being successful in the procurement of goods and services. Contacts with salespeople and subcontractors add to the basis upon which public opinion about Summa Health is formed. For these reasons, Summa Health employees should always treat subcontractors and salespeople with fairness and integrity. Summa Health purchasing and subcontracting decisions are based on objective criteria, not on personal relationships or friendships. Objective decision-making considers factors such as quality, design, price, consistent and timely delivery, adherence to schedules, service, and maintenance of adequate sources of supply.

The following values should always be observed in evaluating and awarding bids, in administering contracts, and in conducting

subcontractor/vendor relations:

- Keep all competition open and fair.
- Be truthful in all verbal and written transactions.
- Respect the confidentiality regarding quotes and other information provided by vendors or subcontractors.

In turn, all salespeople must sign in through purchasing before meeting with hospital personnel. Subcontractors and vendors are expected to conduct themselves in accordance with the same values.

Do the right thing

- Treat Vendors and Subcontractors with fairness and integrity.
- Be truthful in all verbal and written transactions.
- Base purchasing and subcontracting decisions on objective criteria.

Questions and Answers

- Q:** A vendor keeps showing up unannounced in my department and they are not wearing the badge given to them in purchasing when they sign in properly. What can I do about it?
- Q:** Ask the vendor if they are aware of Summa Health process to register with the Purchasing Department prior to calling on departments. Send the vendor to the Purchasing Department.

Marketing Practices

Marketing practices are conducted with truth, fairness and responsibility to patients, the community and the public at large. All information issued (including information on Summa Health's website) will be accurate at the time of publication and will not be presented in an intentionally misleading manner. Summa Health will not purposely misrepresent its services, supply needs, or any other aspect of its business.

Summa Health may engage in marketing and advertising activities to educate the public by providing information to the community, increase awareness of our services and recruit employees. We will present only truthful, informative and non-deceptive information in these materials, our website and/or other electronic publications and announcements. We will comply with applicable federal and state laws and, as relevant, professional ethical guidelines related to marketing, advertising and communication activity. You may not consent to allowing a third party (i.e. vendor) to use or associate Summa Health name, symbols, logos or trademarks in an advertisement, press release, marketing material or website without the prior consent of the marketing and corporate communications department. Advertising relating to clinical trials will be conducted consistent with regulatory requirement and in compliance with Summa Health and IRB policies.

Do the right thing

- Information represented in Summa Health marketing and communications material will be truthful and informative.
- Follow Summa Health’s brand standards for creating and using materials.

Questions and Answers

Q: I would like to market an existing service. Who should I call?
A: Contact the marketing and Corporate Communications team.

Research

Summa Health is committed to responsible conduct of research and to invest in educational programs that prepare researchers, staff, and students. Research undertaken by our physicians and professional staff is conducted within legal and ethical standards. We are committed to research integrity in disseminating appropriate, valid scientific results in accordance with applicable regulations and guidelines.

All human subject research proposals must be approved by the Institution Review Board (IRB) that has oversight responsibility for the research project. Any employee or physician engaging in human subject research must do so in conjunction with IRB approval and consistent with Summa policies and procedures governing human subject research.

Research misconduct is not tolerated. Researchers who falsify or change results, copy results from other studies without performing or citing the applicable research, fail to identify and deal appropriately with conflict of interest, fail to strictly follow study protocol, fail to actively protect the rights of research subjects, or who proceed without IRB approval will be appropriately investigated and sanctioned as necessary.

Physicians participating in research activities involving human subjects are expected to fully inform patients of their rights and responsibilities related to participating in the research or clinical trial. All personnel applying for or performing research of any type are responsible for maintaining the highest ethical standards in any written or oral communications regarding their research projects as well as following appropriate research regulations and guidelines. As in all record keeping, our policy is to submit only true, accurate and complete costs related to research grants.

Students, residents, fellowships:

We will conduct our training programs, including residency and fellowship programs, in accordance with applicable requirements for supervision, billing and evaluation of trainees. The attending physician or supervisor has both an ethical and legal responsibility for the overall care of the individual patient and for the supervision of the trainees involved in patient care and clinical research activities. The supervisory staff, including attending physicians, must ensure that the level of responsibility given to a trainee is appropriate based on each trainees skills and ability, and that the documentation of such supervision is consistent with all applicable requirements.

Do the right thing

- Obtain approval from the Institutional Review Board for all human subject research projects prior to initiating them.
- Conduct all research with integrity and in accordance with federal regulations, IRB approval, and study protocols.
- If you participate in research, have knowledge of the Summa Health research policies and procedures and participate in research education.

Questions and Answers

Q: I have been asked to assist with a research study but I am not familiar with the studies protocol. Where can I find it to review and educate myself?
A: The Principal Investigator of the study has the parameters in writing. Please request a copy from the Principal Investigator or the Institutional Review Board Coordinator.

Safety and Environmental Preservation

The Environment, Medical Waste and Hazardous Materials

Summa Health is committed to protecting the environment. Although Summa Health business may affect its surroundings in many ways, Summa Health’s primary environmental impact lies in the management of medical waste and other hazardous materials and, to a lesser degree, in air emissions from pollutant sources and waste water discharges. Every Summa Health employee is responsible to safeguard patients, fellow employees, the community and the general environment from

harm. Summa Health complies with all applicable occupational health (OSHA), environmental and waste management (EPA) laws and regulations, and cooperates with local, state and federal agencies in their inspection and enforcement activities.

Safety

High-quality health care can only be provided in an environment free from identifiable hazards to Summa Health patients, staff and visitors. Each Summa Health employee is required to observe completely all relevant laws and regulations, as well as the Environment of Care standards set by The Joint Commission). Requests from regulatory agencies shall be referred to the Safety Officer.

Do the right thing

- Everyone within Summa Health has an obligation to maintain a safe working environment not only for themselves and their co-workers, but also for anyone entering Summa Health property.
- Know where personal protective equipment and other equipment is located and how to properly use it.
- Employees are expected to know and to use specific safety policies, procedures and resources related to their individual jobs.
- All Summa Health employees should immediately report to their supervisor any injury to an employee or any injury or unusual occurrence to patients or others.
- No one may use tobacco products in any Summa Health Hospitals building or outside any building entrance.

Questions and Answers

Q: I believe the supervisor could be violating environmental laws and not following our policies and procedures. How should I report my concerns if I have addressed it with my supervisor already?
A: If you believe in “good faith” your supervisor is not in compliance with environmental laws, report it up the chain of command, to the Director of Environmental Services, or by calling the Compliance Hotline.

Harassment

All Summa Health employees, patients, and representatives have the right to an environment that is free of violence and harassment. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable.

We will not tolerate a hostile work environment under any circumstances regardless of whether the behavior takes place before, during, or after normal working hours; inside or outside of the workplace.

All forms of sexual harassment or inappropriate behavior are prohibited. Sexual harassment includes but is not limited to unwelcome sexual advances, requests for sexual favors in conjunction with employment decisions, or verbal or physical conduct of a sexual nature.

An employee having knowledge of any alleged harassment is responsible for reporting it to the supervisor and/or the Human Resource Department or the Compliance Hotline immediately. Such reports will be held in confidence and the employee will be protected from harassment or retaliation for reporting this misconduct. Summa Health will investigate all claims of harassment and take immediate and appropriate remedial action.

Do the right thing

- Do not participate in degrading jokes, harassing or intimidating behaviors
- If you are the victim of harassment, report it immediately to one of the following individuals: the supervisor of the harasser, the department Director, the Vice President of Human Resources, the Director of Labor & Employee Relations, or the Compliance Hotline.

Questions and Answers

Q: What is meant by sexual harassment?
A: Sexual harassment can be described as aggressive sexual behavior that has been demonstrated to a person who has not suggested or encouraged the behavior. It can be sexual jokes, advances, demands or suggestions. If you have been the subject of this type of behavior, please notify your supervisor, Human Resources, or the Compliance Hotline. This behavior is not tolerated at Summa Health. Allegations will be investigated confidentially and offenders will be appropriately disciplined.

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