

# Code of Conduct



*Corporate Compliance:  
Putting Values into Practice!*

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# Welcome to Bristol Health



**Caring Today for Your Tomorrow!** This is the commitment that Bristol Health has pledged to our patients and to our community. We accomplish this by adhering to the highest standards of ethical business conduct and by living our core values of **Communication, Accountability, Respect and Empathy**. Every member of Bristol Health – employees, volunteers, members of the medical staff, board members, you and me – we all contribute to this promise and have a responsibility to conduct ourselves in accordance with these values every day.

This Code of Conduct is an easy-to-understand guide designed to assist each of us in carrying out our daily activities with integrity and in accordance with the highest ethical and legal standards. It is our policy to treat those with whom we interact courteously, respectfully, and with dignity. In doing so, we merit the confidence and support of the public for which we have the privilege to serve.

The Bristol Health culture is one of transparency and communication and we encourage you to submit any comments or suggestions you may have regarding our conduct. Please feel free to contact your supervisor, your human resources representative, our Corporate Compliance Officer or me directly, should you have any comments or concerns. You may also contact our anonymous and confidential Compliance Hotline via telephone at **1.844.361.0775**, or online at [bristolhealth.ethicspoint.com](http://bristolhealth.ethicspoint.com).

It takes all of us! Thank you for all your contributions in making Bristol Health the great organization that it is today and for your commitment to this Code of Conduct.

Sincerely,

**Kurt A. Barwis, FACHE**  
President & Chief Executive Officer

  
**B**

ristol Health is committed to the highest standards of ethics and full compliance with applicable laws and regulations that govern the work that we do. This Code of Conduct (this “Code”) is a guide for all of us and is designed to promote ethical, honest, lawful and compliant behaviors. This Code will not answer every question you may have relating to acceptable behavior. Instead, it is a reference tool that can help you make the right decisions. If you encounter a situation or are considering a course of action that does not feel right, please discuss the situation with your immediate supervisor or department manager, Human Resources representative, the Compliance Officer, and/or contact the Compliance Hotline.

**For purposes of this Code:**

- ▶ Bristol Health refers to the Bristol Hospital and Health Care Group, Inc. and any and all member organizations.
- ▶ The Bristol Health Community includes all Bristol Health employees, contracted individuals with the role and responsibility of an employee, medical directors, section-department-division chiefs, board members, members of board delegated committees, officers, executive leadership, volunteers, students and trainees.

Representatives of Bristol Health such as vendors, external advisors and consultants must also be directed to conduct themselves in a manner consistent with this Code when they are acting on our behalf.



*Our Mission*  
**Caring Today  
for Your  
Tomorrow**



## Our Responsibilities

The Bristol Health Community is responsible for upholding the standards of this Code in all aspects of our work and professional relationships. Those responsibilities include, but are not limited to:

- ▶ Reviewing and following this Code.
- ▶ Reporting concerns when you notice others not complying with this Code.
- ▶ Behaving ethically, honestly and truthfully in all situations.
- ▶ Using good judgment and seeking help when you are uncertain what to do.
- ▶ Fully cooperating with any investigations and/or inquiries related to this Code.

Our Code clearly requires that no employee should ever be expected, encouraged or allowed to violate any law. All employees are expected to conduct their work activities with honesty, integrity and the highest ethical values.

Please read this Code carefully. Keep in mind that this document is meant to be used as a guide when potential ethical and legal issues emerge in your day-to-day activities. Once you have read through it and are clear on its contents, please sign and return the acknowledgment form found in Section VII of this Code of Conduct to your supervisor who will forward it to the Compliance Officer.

### Leadership

Bristol Health leaders are expected to set the example by being kind, sensitive, thoughtful and respectful and to support an environment where all team members feel free to raise concerns and propose ideas.

### Board & Board Committee Members

The Bristol Health Board of Directors is responsible for governing the organization and fostering a culture of integrity and accountability. They provide oversight and challenge all of us to continually do the right thing on behalf of our patients and customers.

### Medical Staff

All members of our Medical and Adjunct Staff must comply with our Code of Conduct and exhibit behaviors including:

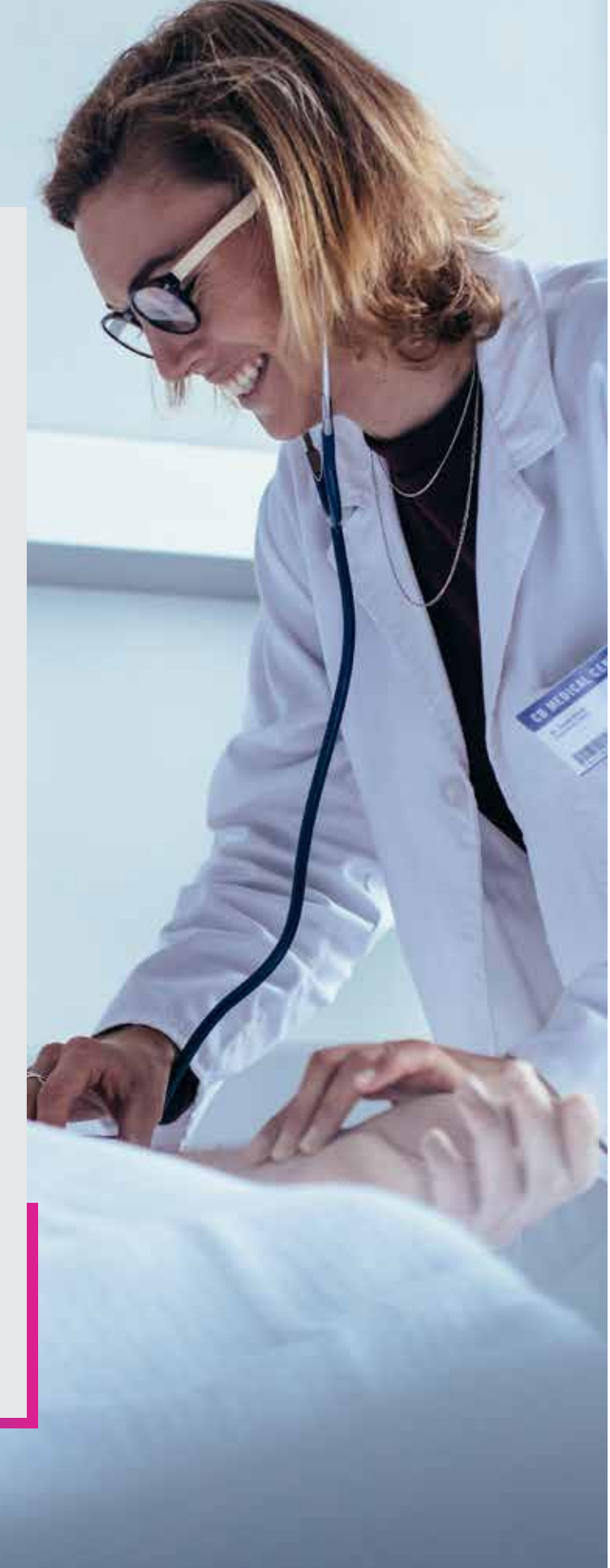
- ▶ Acting professionally at all times
- ▶ Treating others with respect and dignity at all times
- ▶ Maintaining the accuracy and integrity of the information documented in the patient's medical record
- ▶ Not participating in behavior that adversely impacts the community's confidence in Bristol Health's ability to provide quality patient care, including behavior that constitutes sexual harassment
- ▶ Abiding by the rules and policies of Bristol Health including those regarding substance abuse
- ▶ Reporting to the President of the Medical Staff any colleagues who are thought to be impaired in any way

## Code Violations:

Compliance with this Code is mandatory and the standards set forth must be followed. Listed below are some examples of Code violations that may result in disciplinary actions or sanctions:



- ▶ Retaliating against individuals who report issues and concerns in good faith;
- ▶ Theft or misappropriation of Bristol Health assets, funds, equipment, supplies or other property;
- ▶ Intentional or reckless behavior that compromises the privacy and security of personal health information and other confidential business information
- ▶ Actions that may be considered discriminatory, harassing, or bullying;
- ▶ Knowingly and willingly submitting inaccurate and/or false documents to government entities
- ▶ Providing unsafe, substandard or medically unnecessary care
- ▶ Participating in, or failing to report a violation of law, regulation, or Bristol Health policy





### **Our Values**

#### **Communication**

Effectively communicate with patients, residents, families and/or support persons, customers and fellow employees.

#### **Accountability**

Take initiative and responsibility needed to achieve results.

#### **Respect**

Demonstrate high regard for the value and dignity of every person.

#### **Empathy**

Show awareness of other's feelings, needs and concerns.



## **Patient Care**

We aim to heal, comfort and care for the people of our community by providing quality health care in a compassionate and safe manner. We treat all patients with warmth, respect, and dignity and provide care that is both necessary and appropriate.

### **Patient Rights**

It is the policy of Bristol Health to recognize and respect the dignity of all patients and to protect their rights including, but not limited to, the right to:

- ▶ Be treated with respect, compassion and courtesy in a safe environment
- ▶ Receive fair treatment and care - free from discrimination
- ▶ Refuse or accept treatment
- ▶ Informed decision-making
- ▶ Freedom of choice
- ▶ Access health information
- ▶ Effective communication
- ▶ Privacy and confidentiality
- ▶ Visitation and caregiver support
- ▶ Voice concerns and have conflicts resolved in a fair and objective manner

## **Emergency Treatment:**

When an individual presents at the hospital, we will comply with the law as outlined in the Emergency Medical Treatment and Labor Act (EMTALA) by providing an emergency medical screening, examination and necessary stabilization to all patients prior to any transfer or discharge.

Detailed guidance may be found by accessing the Bristol Health.

*Patient Transfer and EMTALA Compliance Policy*



## Business and Financial Information/Environment

### Accuracy, Retention, & Disposal of Documents & Records

Each Bristol Health employee is responsible for the integrity and accuracy of the organization's documents and records. No one may alter or falsify information on any record or document and records must never be destroyed if they may be relevant to a government investigation.

### Coding & Billing

Bristol Health will only bill patients or third party payers for medically necessary services performed, documented and coded in accordance with applicable laws and billing requirements. Service not medically

necessary will be paid prior to treatment after arrangements are made for payment with the Business office.

### Maintaining Patient & Employee Privacy

Patient health information shall be protected in accordance mandated federal and state privacy protections and according to Bristol Health policy. Employee personnel records shall remain confidential and will only be disclosed as required by law or as necessary to resolve investigations. Minimum necessary standards will be followed at all times.



*Our Vision*  
**Advancing the Health  
of Our Community  
Through Integrated,  
Innovative and  
Individualized Care**

### Protecting Confidential Business Information

Protecting confidential information is a priority. We access confidential information and share it with others only when authorized to do so and for the purpose of doing our job. We follow applicable laws and policies when releasing confidential information and report concerns to appropriate parties. We investigate and report breaches of patient information and take steps to secure our systems from unauthorized access and comply with information security policies.

### Respecting Intellectual Property

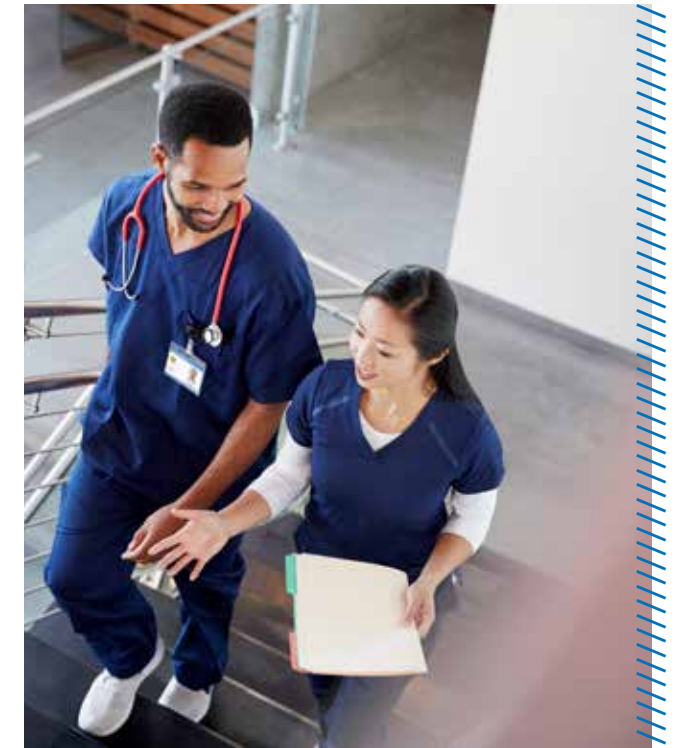
Employees are prohibited from reproducing, distributing or altering copyrighted materials without the express written consent of the owner. Bristol Health strongly respects and supports patents and other forms of intellectual property.

### Controlling Costs

Bristol Health recognizes the importance of controlling operating costs. However, we recognize the importance of achieving this goal in an ethical and legal manner and we never compromise the quality of care provided to our patients.

### No Personal Use of Bristol Health Resources

The personal use of a Bristol Health asset without prior supervisory approval is prohibited. Any community or charitable use of Bristol Health resources must be approved in advance.



### Email & Internet Use

Bristol Health treats email sent or received by employees and contractors no differently than other business records or correspondence. All business records are subject to inspection or disclosure without notice. You are prohibited from using email and the internet in any way that disrupts Bristol Health operations or violates Bristol Health policies.



orkplace conduct and employment practices are a critical component of this Code. We have policies in place related to diversity, non-discrimination, violence, substance abuse and controlled substances.



### Diversity, Equal Employment Opportunity & Non-Discrimination

Bristol Health supports a culture of diversity and inclusion. We treat everyone with respect. We do not tolerate illegal discrimination against anyone including visitors, patients and fellow employees. We do not tolerate conduct that is disrespectful, hostile, intimidating, or harassing

### Harassment & Workplace Violence

Harassment and disruptive behavior is prohibited. This prohibition includes unwelcomed sexual advances or requests for sexual favors. Workplace violence includes the use of physical force to resolve disputes, stalking, robbery, hate crimes and other forms of violence. Employees who observe or experience any form of harassment or violence should report it immediately to their supervisor.

### Substance Abuse & Mental Acuity

To protect the interests of Bristol Health employees and patients, we are committed to an alcohol and drug-free work environment. All employees must report for work free of the influence of alcohol and illegal drugs. In addition, using, possessing, purchasing or selling illegal drugs while on Bristol Health work time or property may result in immediate termination.

### Protect Controlled Substances

Bristol Health handles many prescription drugs for the benefit of our patients. No employee (including physicians, nurses and pharmacists) affiliated with Bristol Health may ever illegally distribute or divert any controlled substances, including prescriptions drugs, from Bristol Health.



## A Safe Workplace

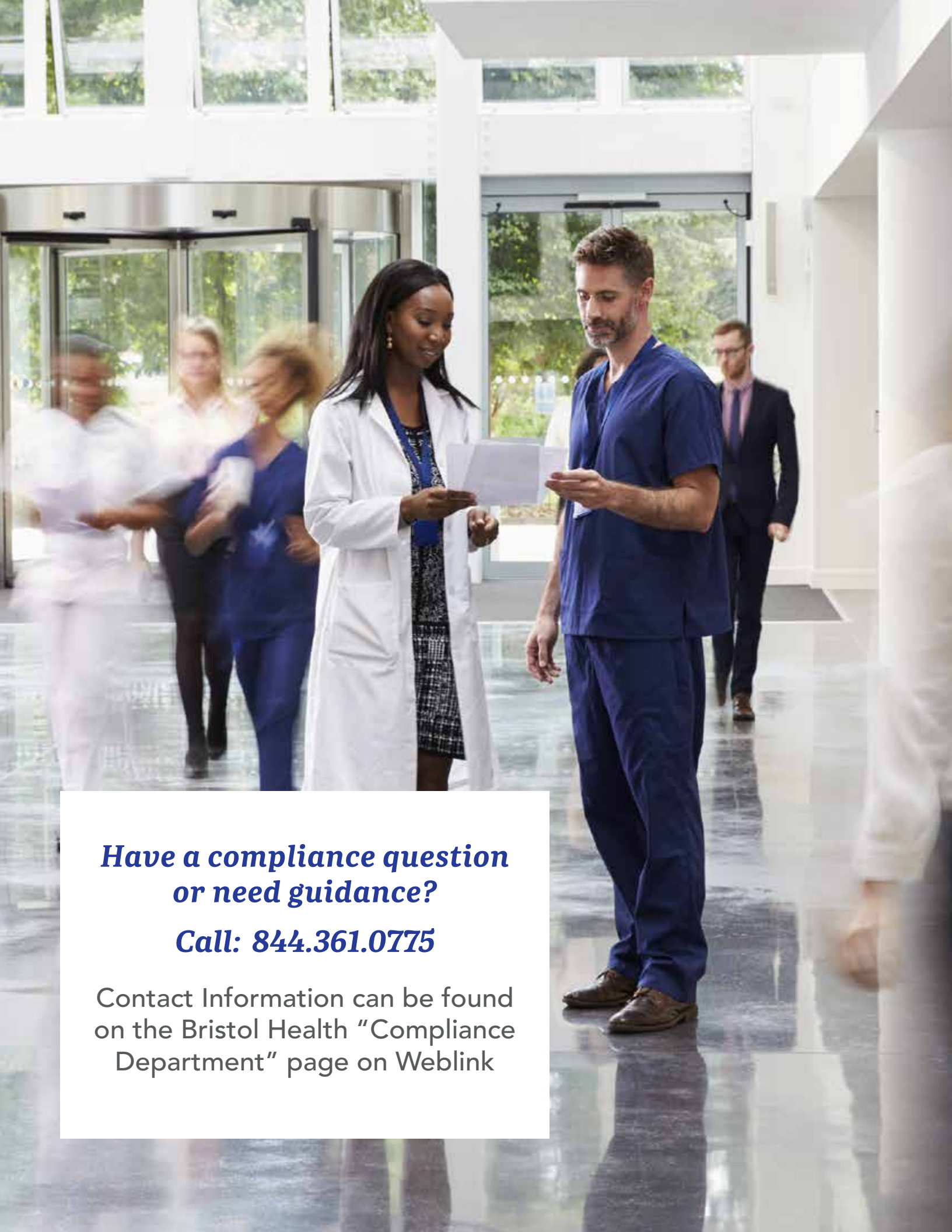
### Health & Safety

Bristol Health complies with all government regulations and rules and organizational policies and practices that promote the protection of workplace health and safety. Internal policies have been developed to assist and protect employees from potential workplace hazards. Employees must become familiar with and understand how these policies apply to their specific job responsibilities and seek advice from their supervisor whenever they have a question or concern. It is important that each employee immediately advise his or her supervisor of any workplace injury or any situation presenting a danger of injury so timely corrective action may be taken to resolve the issue.

### Environmental Compliance

It is our policy and every employee's responsibility to comply with all environmental laws and regulations as they relate to Bristol Health operations. We operate our facilities with the necessary permits, approvals, and controls in order to provide a safe environment of care and to prevent pollution.





**Have a compliance question  
or need guidance?**

**Call: 844.361.0775**

Contact Information can be found  
on the Bristol Health “Compliance  
Department” page on Weblink

## External Relationships

### Conflicts of Interest

All Bristol Health Community members are expected to act in the best interest of the organization and our patients at all times and must avoid any outside activities that distract from or negatively impact job performance. A position at Bristol Health may not be used for personal gain or to assist others unfairly at the expense of Bristol Health.

### Relationships with Subcontractors & Suppliers

Bristol Health manages consulting, subcontractors, and supplier relationships in a fair and reasonable manner, free from conflicts of interest and consistent with all applicable laws and good business practices. We promote competitive procurement to the maximum extent practicable and our purchasing decisions are made based on the supplier’s ability to meet our needs, and not on personal relationships and friendships.

### Bribes, Kickbacks and/or Illegal Payments

We do not offer or accept bribes or kickbacks. Bribes and kickbacks are money, gifts, or special treatment given to someone in exchange for a favor. The favor may be many things, from a promise to make patient referrals to a promise to use a particular vendor’s product. We also do not offer or accept “something of value” for patient referrals. “Something of value” includes money, services, gifts, entertainment, or anything else of value to the recipient. As this is a highly complex area of the law, employees must take special care and promptly refer any questions to the Compliance Office.

### Limits on Gifts, Entertainment & Gratuities

As a general rule, employees should never offer, give or accept any benefits – such as incentives, gifts, discounts or rewards – from patients, suppliers, or distributors that might influence, or be perceived to influence, the employee’s actions in their job duties. Rare instances of acceptance must be made in compliance with Bristol Health policy and disclosed in detail to the employee’s supervisor and to the Compliance Office.

### Political Relations

Local, state and federal governments have laws governing contributions from organizations for elections and political parties. Bristol Health will not make any direct or indirect contributions in connection with a federal, state or local election. No employee should ever be forced, directed or in any way urged to make a political contribution by a fellow employee.

### Marketing & Advertising Practices

To ensure an accurate depiction of the services available to current and prospective patients, we are committed to maintain truthful and unambiguous representations and descriptions of clinical services through all communications including advertising and marketing.





## Regulatory Compliance

### Ineligible Persons & Entities

Bristol Health will not contract with, employ, or bill for services rendered by an individual or entity that is: excluded or ineligible to participate in Federal healthcare programs; suspended or debarred from Federal government contracts; has been convicted of a criminal offense related to the provision of healthcare items or services contracts; or has been convicted of a criminal offense related to the provision of healthcare items or services.

### Accurate & Complete Information

Bristol Health is in a highly regulated industry and has numerous dealings with governmental agencies to which we are required, on a regular basis, to record, compile, maintain, and submit substantial information. All employees who prepare or submit information to these government agencies must do so diligently, accurately and with the highest degree of integrity.



### License & Certification Renewals

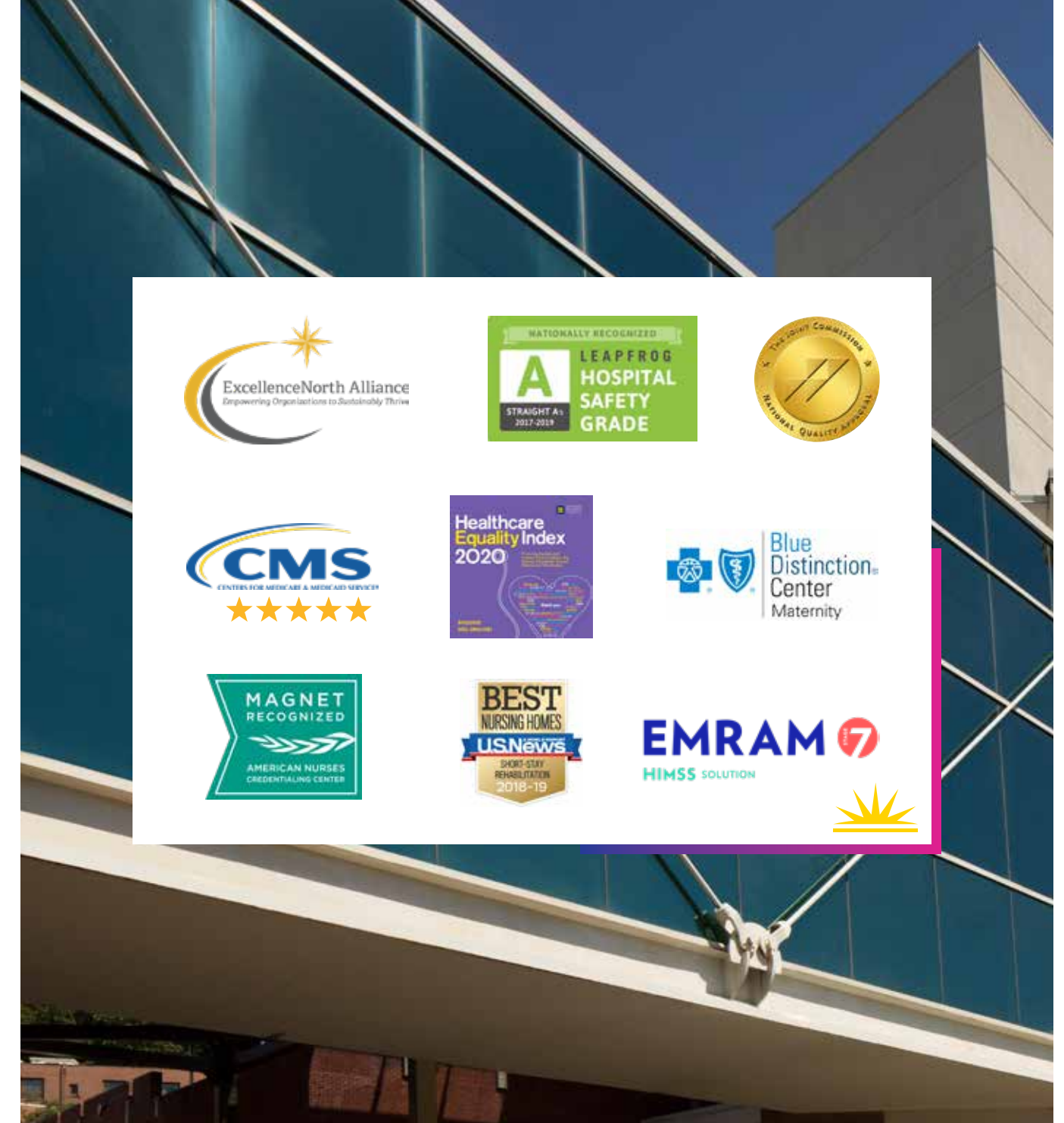
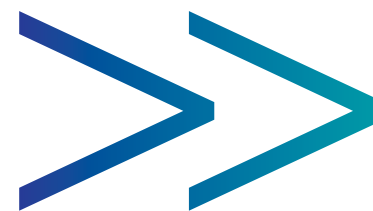
Employees, individuals retained as independent contractors, and privileged practitioners in positions which require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with Federal and state requirements applicable to their respective discipline.

### Antitrust

All employees and representatives conducting business on behalf of Bristol Health must comply with applicable Antitrust laws which are designed to create a level playing field in the marketplace and to promote fair competition. It is prohibited to discuss Bristol Health business with a competitor, such as how our prices are set, disclosing the terms of supplier relationships, allocating markets among competitors, or agreeing with a competitor to refuse to deal with a supplier.

### Interactions with Physicians

Federal and state laws and regulations govern the relationship between Bristol Health and physicians who may refer patients to our facilities. The applicable Federal laws include the Anti-Kickback and Stark Laws. Bristol Health employees who interact with physicians must be aware of and comply with the requirements of these laws, regulations and policies. Any arrangement with a physician must be structured to ensure compliance with all legal requirements, internal policies and procedures, and with any regulatory guidance that has been issued by a governmental agency.



## Addressing Violations

Violations of this Code by individuals other than Medical and Adjunct Staff will be reported to and handled by applicable Department Leadership in coordination with the Human Resources Department and in alignment with Bristol Health policy.

Violations of this policy by Medical and Adjunct Staff will be reported to and handled by the President of the Medical Staff in accordance with the Bylaws of the Medical Staff of Bristol Hospital pertaining to corrective action.

## Getting Help and Reporting Problems

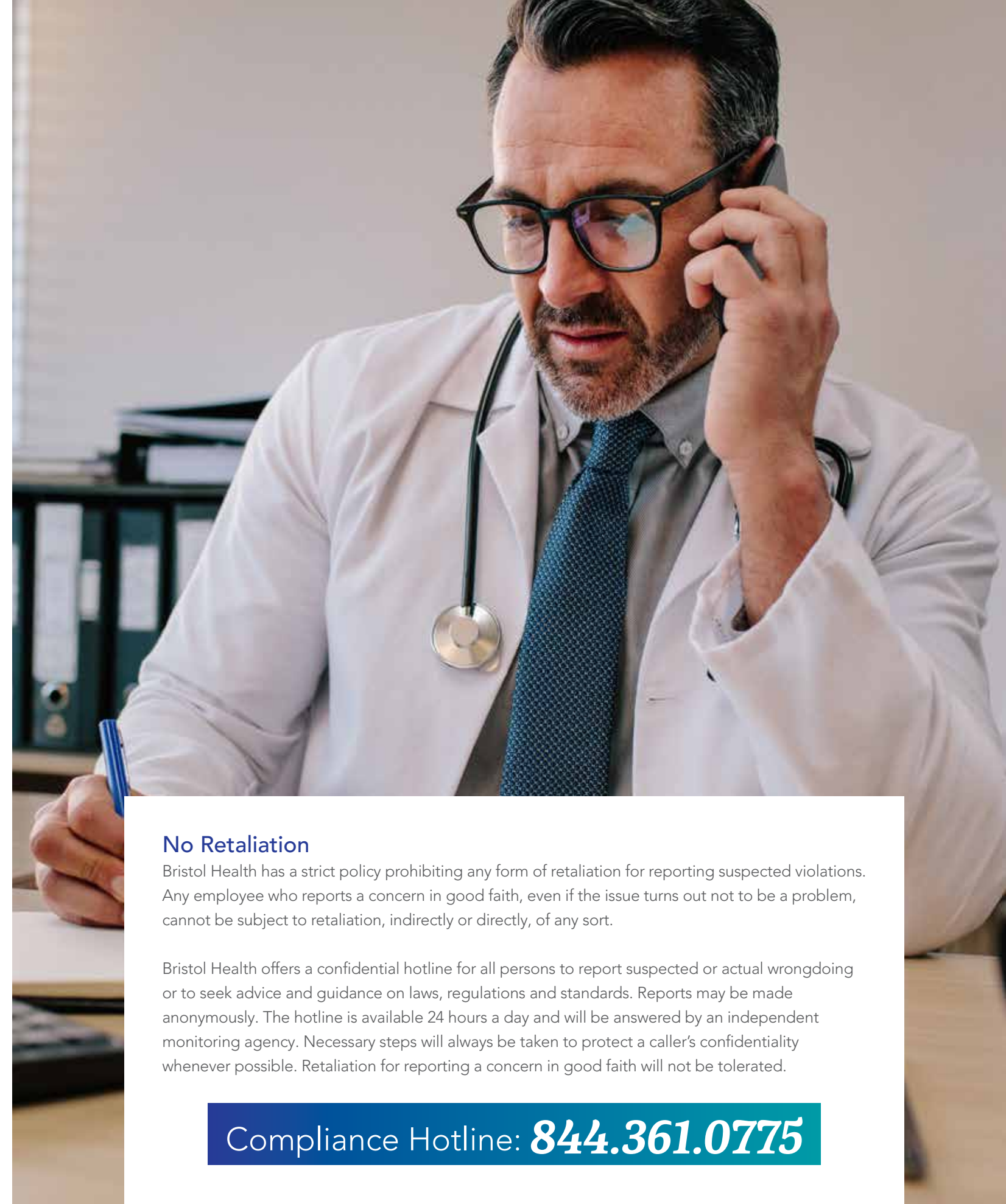
Bristol Health services are provided in compliance with the conditions of participation for Federal healthcare programs and pursuant to appropriate Federal, state, and local laws and regulations designed to mitigate fraud, waste and abuse. Violations of such may subject Bristol Health to severe civil and criminal penalties, including large fines and being barred from certain types of business.

### Duty to Report:

It is mandatory that any suspected violations of this Code of Conduct, Bristol Health policies, the law or ethical standards be promptly brought to management's attention. Any employee aware of an actual or suspected violations must report such violation immediately to any one of the following persons or resources:

- 1 Your supervisor or department manager
- 2 A Human Resources representative
- 3 The Compliance Officer
- 4 The Privacy Officer
- 5 A report may also be made by calling the Bristol Health Compliance Hotline at 844.361.0775 or on the web intake site at <https://bristolhealth.ethicspoint.com>

All reports made in Good Faith will be promptly and thoroughly investigated in accordance with Bristol Health policy. Employees must cooperate with these investigations and must not prevent, hinder, or delay discovery and full investigation of suspected violations.



### No Retaliation

Bristol Health has a strict policy prohibiting any form of retaliation for reporting suspected violations. Any employee who reports a concern in good faith, even if the issue turns out not to be a problem, cannot be subject to retaliation, indirectly or directly, of any sort.

Bristol Health offers a confidential hotline for all persons to report suspected or actual wrongdoing or to seek advice and guidance on laws, regulations and standards. Reports may be made anonymously. The hotline is available 24 hours a day and will be answered by an independent monitoring agency. Necessary steps will always be taken to protect a caller's confidentiality whenever possible. Retaliation for reporting a concern in good faith will not be tolerated.

Compliance Hotline: **844.361.0775**



*Caring today for your tomorrow*

For more information please call:

**860.585.3000**

**[bristolhealth.org](https://bristolhealth.org)**

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